

Mary Vargo
16803 Freeman's Ground
St. John, VI 00830

August 2, 2026

Leia LaPlace, Director
Division of Comprehensive & Coastal Zone Planning
VI Department of Planning and Natural Resources
4611 Tutu Park Mall
Suite 300, 2nd Floor
St. Thomas, VI 00802

Re: Public comment for CCZP0025-26

Dear Director LaPlace,

I am writing to provide comments regarding Application CCZP0025-26, which seeks to rezone Parcel 10 Estate Fortsberg to B-2 Business.

I am submitting these comments as a member of the Coral Bay community and as a homeowner whose family property in Estate Eden overlooks this area. Although I am not writing in my official capacity as an employee of DPNR-CZM, my professional experience in watershed management informs my perspective on the environmental and land-use issues associated with this application.

I respectfully request that CCZP deny, or at minimum defer, the proposed rezoning.

First, there appears to be a discrepancy regarding the property's current zoning designation. The rezoning application identifies the parcel as R-2, while the official zoning map appears to designate it as R-1. Before considering the merits of the application, it would be helpful to clarify the property's existing zoning and ensure that the application and public review process are based on accurate information.

The application states that the purpose of the rezoning is to "bring the property into zoning conformity with its past retail and commercial usage." However, past commercial use alone is not a sufficient basis for rezoning. If commercial activities occurred on property zoned for residential use, that history should not itself justify a zoning change to commercial use.

The property has reportedly been used for commercial purposes in the past, including operation as a nightclub decades ago, and more recently, as a hardware or marine supply business. To the extent these activities occurred while the property was zoned residential, they represent evidence of nonconforming or potentially unauthorized use rather than evidence that commercial zoning is appropriate. Granting a zoning change on that basis could create the appearance of rewarding past noncompliance and establish an undesirable precedent.

In addition, a portion of Parcel 10 Estate Fortsberg lies within FEMA Flood Zone AE and is adjacent to, and drains into, a salt pond wetland. Parcel 10 is considered environmentally sensitive and susceptible to flooding concerns. The existing residential zoning serves as an important buffer between more intensive development and the wetland system.

The applicant has not proposed a specific future use that would allow for a fully informed evaluation of the request. A rezoning to B-2 would permanently authorize a broad range of commercial activities, including restaurants, bars, gas stations, automobile-related businesses, and other uses that may increase impervious surface coverage, stormwater runoff, and other environmental impacts.

Even if the current owners envision only a modest commercial use, zoning runs with the land. Approval of B-2 zoning would authorize a wide array of commercial uses for future owners as well. In my view, CCZP should require a more detailed description of the intended use and consider whether a less intensive zoning classification, conditional approval process, or other land-use mechanism may be more appropriate. Such approaches would allow CCZP to evaluate specific impacts rather than grant the full range of development rights associated with B-2 zoning.

For these reasons, I respectfully request that the rezoning application be denied and that the property retain its current residential zoning designation and important environmental buffer function. At a minimum, the application should be deferred until the applicant provides sufficient information regarding the intended future use of the property, at which time a full informed assessment with additional opportunity for public comment can occur.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary Vargo', with a stylized, cursive script.

Mary Vargo