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Leia LaPlace-Matthew, Director
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Department of Planning and Natural Resources
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**RE: Application for a Zoning Map Amendment on Behalf of
 St. Thomas Hospitality, LLC
 Application No. CCZP0043-26
 DNF File No. 7947-10001**

Dear Director LaPlace- Matthew:

As you know, this Firm represents St. Thomas Hospitality, LLC, a U.S. Virgin Islands limited liability company (the "Applicant"), generally and in connection with the above-referenced Application for a Zoning Map Amendment, which was filed with the Department of Planning and Natural Resources ("DPNR"), Division of Comprehensive & Coastal Zone Planning ("CCZP" or the "Division") on May 14, 2026 (the "Application"). In the Application, the Applicant requests that Parcel Nos. 2N-1 and 2N-2, Estate Bakkerø, No. 5 Frenchman's Bay Quarter, St. Thomas, U.S. Virgin Islands be re-zoned from R-1 (Residential-Low Density) to R-3 (Residential-Medium Density) so that these two parcels will be in conformity with the adjoining parcels that are also owned by the Applicant, upon which the Applicant seeks to develop a hotel complex.

First and foremost, we are pleased to note that on August 6, 2026 Assistant Commissioner Walker issued a Recommendation Report on behalf of CCZP (the "Report"), recommending that the Application for a Zoning Map Amendment be approved and that the above-referenced parcels be rezoned from R-1 to R-3. In her report, Assistant Commissioner Walker noted that the Application is consistent with the overarching policy goals of the Division, including the 2024 Comprehensive Land and Water Use Plan. As the Report also notes, the proposed hotel development will "expand visitor accommodations, create employment opportunities, and contribute to the Territory's tourism infrastructure in an area already characterized by resort and hospitality uses." (Report, p. 6) We duly appreciate your Division's careful consideration of the matter.

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Next, I write to respond to the concerns and comments raised during the Virtual Public Hearing on July 20, 2026 and in the written public comment received from Mr. Josep Arellano and Ms. Vipawan Boontaweessuk on August 3, 2026 (the "Public Comment Letter").

1) Solar Panels: In the Public Comment Letter, Mr. Arellano states that the Applicant informed the Division that no solar panels would be installed on the hotel development property and asks that the Division restrict the Applicant from installing solar panels. This is an inaccurate representation of the Applicant's statements. In response to Director Amanda Jackson-Acosta's inquiry regarding the Applicant's plans for energy, the Applicant responded that "we are going to work in some solar where we can" (see pg. 17, line 15 of the Hearing Transcript). The Applicant endeavors to be a good neighbor and will work to minimize impositions to private residences in the area, such as any reflective glare from solar panels, however, solar panels may be needed as a supplemental source of power. Environmental sustainability requires that renewable and accessible energy sources, such as solar power, be integrated into the development project. The way solar panels function, there is glare in any one direction for only one hour a day. It is almost certain that small panels will need to be used throughout the property for such purposes as water heaters, outdoor lighting, and automatic gates. If the Applicant determines that solar panels will be needed, the Applicant will do a study of the reflectivity to identify positioning that has the most limited impact on its neighbors. If solar panels are used, the Applicant will, in good faith, avoid creating excessive glare for the neighbors.

2) New Access Road: In the Public Comment Letter, Mr. Arellano stated that the Applicant informed the Division that the Applicant would not be using Evening Star Road and asks that the Division restrict the Applicant from using Evening Star Road. Again, this is an inaccurate representation of the Applicant's statements. The Applicant informed Mr. Arellano and the Division that it will construct a new road at the south border of the property, but the Applicant did not represent that it would never drive on Evening Star Road. Instead, the Applicant stated that Evening Star Road would not be used as the entrance of the hotel property, indicating that the hotel would not use the road as one of its main thoroughfares. In fact, the Applicant shared plans to resurface, improve, and maintain the existing roadways bordering the property, to make the roads safer for everyone's use (see pg. 16, line 9, and pg. 33, line 10 of the Transcript). Currently, the Applicant does not yet have any input from the fire marshal and is awaiting the fire marshal's assessment of what improvements may be necessary to provide better access to the property for emergency equipment.

3) Parking: In the Public Comment Letter, Mr. Arellano stated that he believes that fifty (50) parking spaces reserved solely for guests will not provide adequate parking. To the contrary, numerous observations indicate that tourists and visitors often rely on alternative transportation, such as taxis and private shuttles. The Applicant is in communications with various hotel brands and ultimately the brand used with the hotel development will determine the optimal requirements for available parking for guests and employees. Moreover, the use of valet parking as a guest amenity will allow the developer to maximize the use of available spaces. In sum, the

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Applicant will ensure that an adequate number of parking spaces for guests and employees will be provided as a part of the hotel development.

4) Height and Density: In the final part of his Public Comment Letter, Mr. Arellano posits that the proposed development will be extremely dense, that the buildings will be very tall, in sharp and jarring contrast to the surrounding hillside, and as a result he opposes the overall development. The Applicant recognizes that the development will introduce new structures to Estate Bakkerø. However, 80% of the hotel development project will be situated on properties that have been zoned R-3 for longer than Mr. Arellano has owned his property. Mr. Arellano cannot claim to be surprised by a development on property consistent with its zoning, which has existed for the entire time that Mr. Arellano has owned his property. Additionally, as the Assistant Commissioner noted in her Report, tourism is a "primary component of the Virgin Islands economy" and the proposed development is a concerted effort to advance this crucial economic engine in a manner that respects all local laws and rules.

The Applicant and I wish to express our deep appreciation for the Division's time and attention to this matter. We look forward to continuing to comply with all applicable environmental and permitting requirements as we work to erect the Territory's newest hotel property.

Should you have any questions regarding this matter, you may reach me at the number above.

Sincerely,



George H.T. Dudley

cc: The Honorable Milton E. Potter, President, 36th Legislature of the US Virgin Islands