



GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS

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DEPARTMENT OF PLANNING AND NATURAL RESOURCES

4611 Tutu Park Mall
Suite 300, 2nd Floor
St. Thomas, VI 00802
(340) 774-3320

45 Mars Hill, Frederiksted
St. Croix, VI 00840
(340) 773-1082
dpr.vi.gov



Office of the Commissioner

**Report by the Division of Comprehensive and Coastal Zone Planning on
the Petition to Amend Official Zoning Map No. STZ-7, Application No.
CCZP0043-26**

Petition of applicant, St. Thomas Hospitality, LLC, to amend Parcel Nos. 2N-1 and 2N-2 Estate Bakkerø, No. 5 Frenchman's Bay Quarter, St. Thomas from R-1 (Residential-Low Density) to R-3 (Residential-Medium Density). The purpose of the request is to allow the two lots to be in conformity with other owned lots to develop a hotel complex.



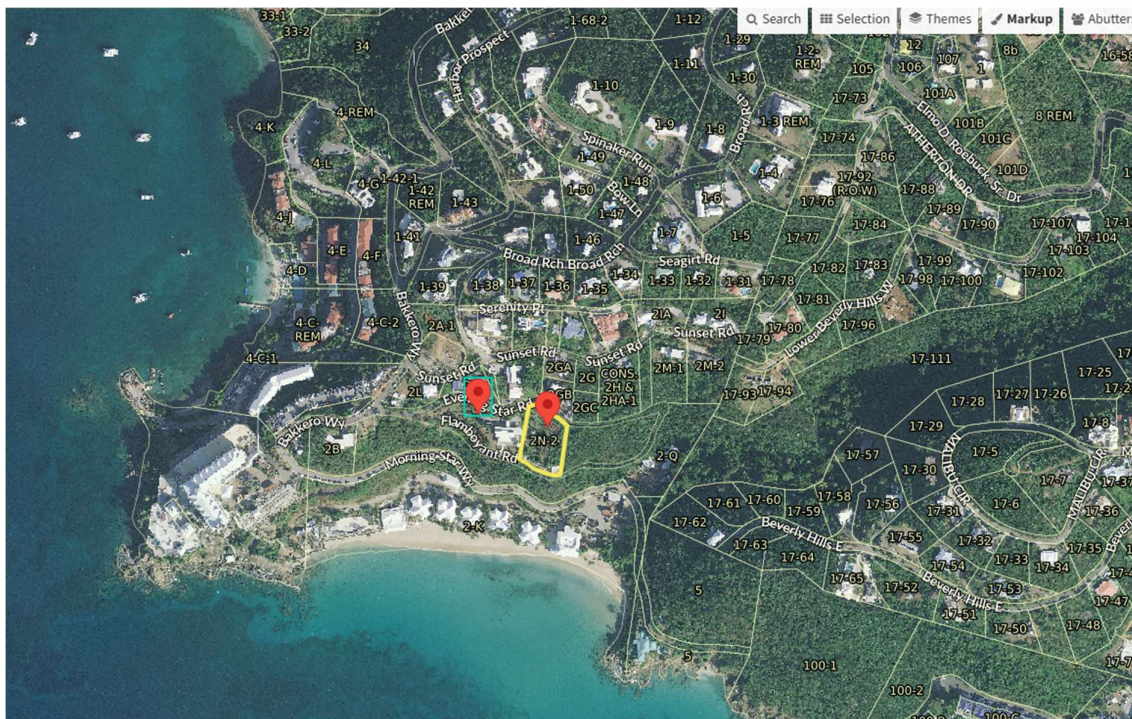
Site photo- subject properties outlined in red. Adjacent owned properties outlined in yellow

Property Owner(s): St. Thomas Hospitality, LLC as per Warranty Deed dated October 16, 2024, Document No. 2025001133.

Applicant Representative(s): George Dudley, partner in the Law Firm of Dudley Newman and Feuerzeig; and Kurt Blorstad and Chris Desai, members of the St. Thomas Hospitality Group.

Acreage: 2N-1 contains 0.79 acres and 2N-2 contains 0.58 acres, for a total of 1.37 acres, as described on survey drawing No. G9-3048-T80.

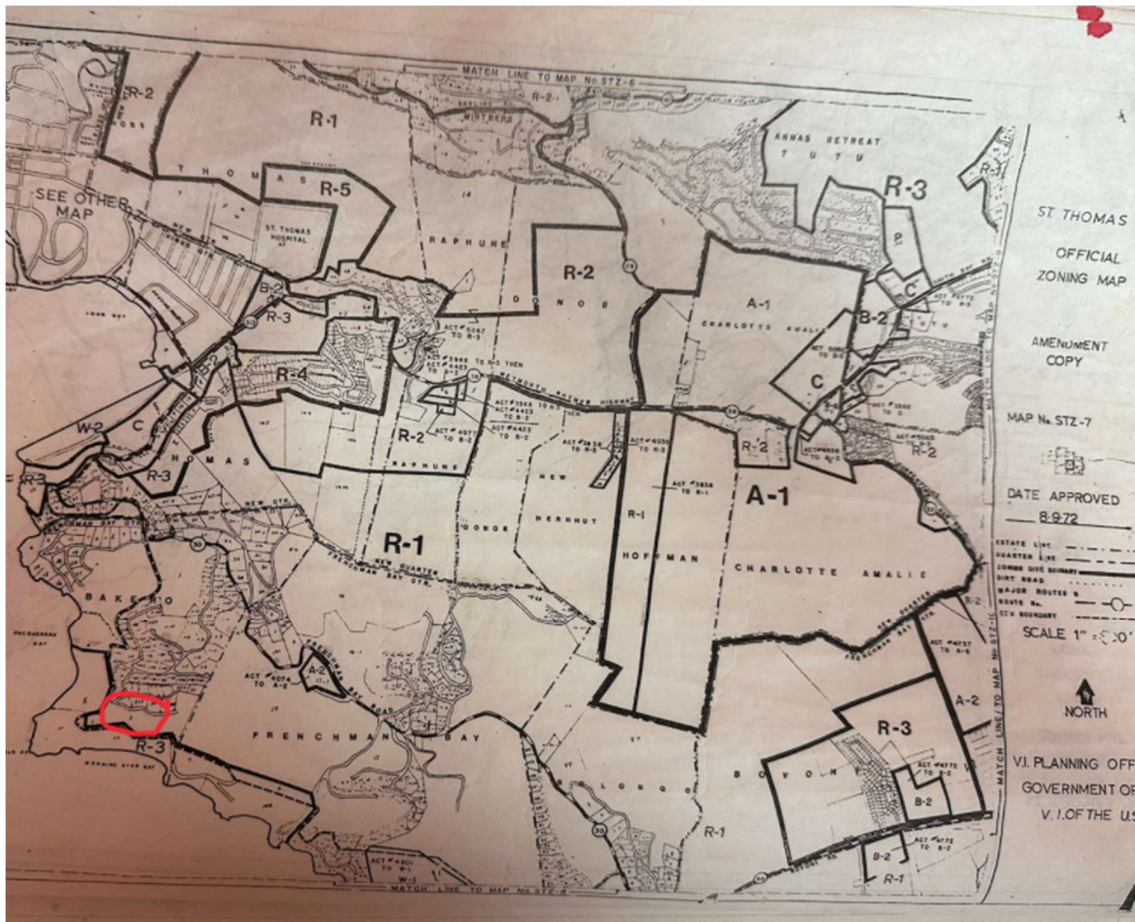
Surrounding Uses and Zones: To the north is a road and residences. To the east is undeveloped land. To the south is undeveloped land, a road, and then a hotel. To the west is a road and another hotel.



MapGeo aerial view of properties (marked with red)

The surrounding area is zoned R-1 and R-3 and has four zoning map amendments:

Parcel/Plot No.	Year Rezoned	Original Zone	Rezoned To	Act No.
2A-1 & 2A Remainder	2020	R-1	Use Variance for hotel, restaurant, & pool bar	8285
2B, P, Q, R, & S	1994 & 2001	R-1	R-3	5987 & 6427
2L	2025	R-1	R-3	8993



Official Zoning Map No. STZ-7 (properties' location indicated by red circle)

Infrastructure: Public lines will handle water needs and sewer service will be provided through on-site sewage treatment.

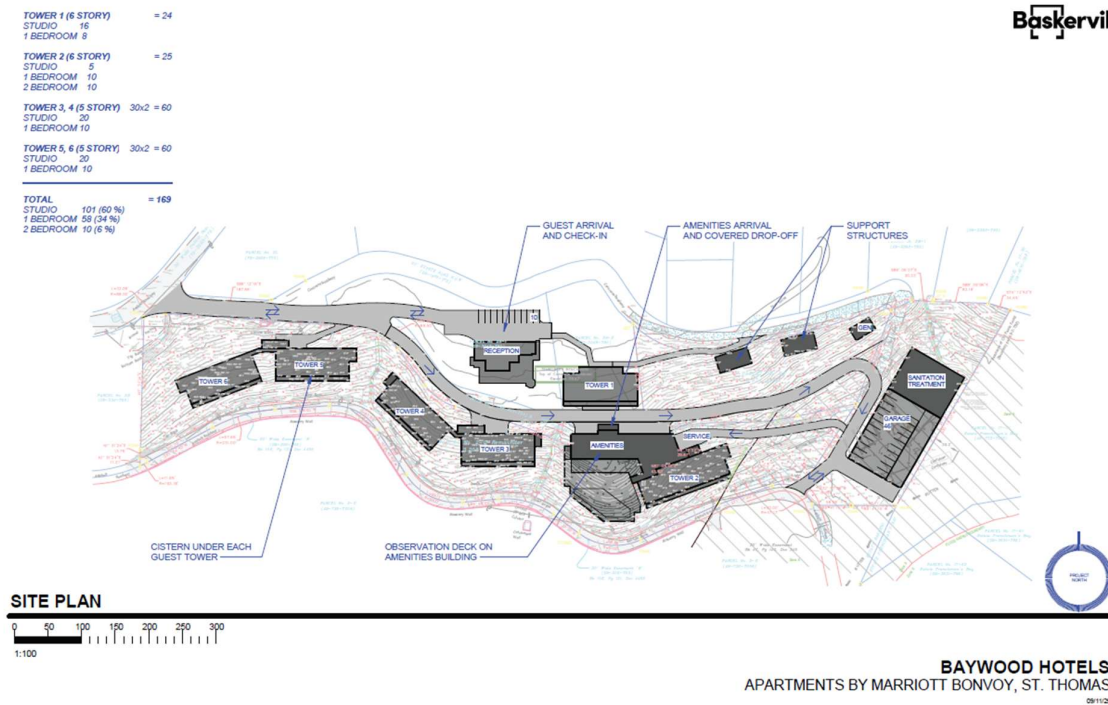
Other DPNR Division reviews needed: Permits for new construction. Division of Fish and Wildlife (DFW) noted the Information for Planning and Consultation (IPAC) system acknowledged there may be VI Tree Boas and *Myrcia (Calypttranthes) thomasiana* on site. Based on the scope provided, DFW determines that this project should not impact wetlands. Given the presence of VI Tree Boas, all DFW VI Tree Protocols are required to be followed and that DFW should be contacted if a VI Tree Boa or *Myrcia (Calypttranthes) thomasiana* is found on site.

Project Summary: The applicant's proposal seeks to facilitate incorporation of the subject properties into a proposed hospitality development adjoining other R-3 properties owned by the same applicant. The parcels are intended to support the development of a resort-style hotel complex consisting of approximately 169

guest rooms distributed among multiple buildings, with amenities including a pool, restaurant, spa, parking facilities, and hotel support services. The applicant indicated that one existing residential structure would be retained and repurposed as a hotel-related facility, such as a check-in area, restaurant, or guest amenity space, while the second parcel may house additional guest rooms and employee parking.

EXHIBIT 10

Baskervill



Conceptual Site Plan Layout

Public Response at DPNR-CCZP Public Hearing held July 20, 2026: During the public hearing, concerns were raised regarding parking adequacy, traffic circulation, road improvements, stormwater management, wastewater treatment, potential impacts to nearby residential properties, and the project's proximity to sensitive coastal resources and Morningstar Beach. The applicant acknowledged these concerns and stated that the development remains in the preliminary design stage, with ongoing environmental, engineering, and feasibility analyses being conducted to address infrastructure, drainage, and coastal resource considerations.

Following the public hearing, adjacent property owners submitted comments opposing the rezoning, citing concerns that the proposed 169-room hotel would be incompatible with the residential character of Estate Bakkerø due to its size,

height, density, traffic generation, parking demand, noise, visual impacts, and potential strain on local infrastructure.

The commenters requested that several commitments made by the applicant be preserved and enforced, including:

- No installation of rooftop solar panels due to potential glare impacts on uphill residences.
- Construction of a new access road rather than use of Evening Star Road, which they consider unsuitable for hotel traffic.
- Adherence to represented parking plans, while noting concerns that the proposed parking supply may be inadequate and could lead to future expansion, congestion, and overflow parking.

The commenters also expressed concern that the development's multiple mid-rise buildings, support facilities, parking garage, and internal road network would be significantly larger and denser than surrounding one- and two-story residential homes, altering the character of the neighborhood and hillside views.

Additional concerns included increased traffic congestion, parking shortages, noise, safety issues, and cumulative impacts when considered alongside existing parking and traffic challenges associated with nearby hotel properties, including Frenchman's Reef and Morningstar/Blue House.

The commenters requested denial of the rezoning application or, alternatively, that the applicant's commitments regarding solar panels, road access, and parking be formally documented and enforceable, and that substantial weight be given to concerns regarding density, height, traffic, noise, and neighborhood compatibility.

Analysis of Request/Reason for Recommendation: The proposed rezoning is consistent with the goals, policies, and strategies of the 2024 Comprehensive Land and Water Use Plan (Comp Plan). The Comp Plan promotes land use decisions based on sound planning principles, coordinated development patterns, economic sustainability, environmental stewardship, and the efficient use of limited developable land. It further calls for zoning decisions to be evaluated in the context of broader land use patterns and long-term community objectives rather than through isolated or piecemeal actions.

The subject properties are located adjacent to lands currently owned by the applicant that are zoned R-3 and planned for integrated hospitality development. Rezoning the subject parcels would create a more cohesive and unified zoning

pattern within the development area and would facilitate coordinated site planning rather than the continuation of split zoning within a single ownership and development parcel. As such, the request is generally consistent with the Comp Plan objective of reducing reliance on spot zoning and promoting predictable, coordinated land use decisions.

The proposal also advances the Comp Plan's economic development objectives, which recognizing tourism as a primary component of the Virgin Islands economy while encouraging development that supports long-term economic opportunity and investment. The proposed hotel development would expand visitor accommodations, create employment opportunities, and contribute to the Territory's tourism infrastructure in an area already characterized by resort and hospitality uses.

The Comp Plan identifies St. Thomas as experiencing significant development pressure due to constrained land availability, steep topography, and concentrated economic activity. The Comp Plan encourages the efficient use of lands adjacent to existing development and infrastructure rather than the expansion of development into isolated or environmentally sensitive areas. The subject parcels are located within an area already influenced by hospitality and residential development and therefore represent an infill expansion of an existing development pattern rather than the extension of urban development into a previously undeveloped district.

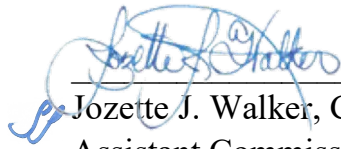
The proposal is further consistent with Comp Plan policies supporting mixed and flexible land use arrangements, redevelopment of strategically located properties, and the strengthening of tourism-related economic activity, provided that applicable environmental, infrastructure, and permitting requirements are satisfied during subsequent review and permitting processes. The Comp Plan specifically contemplates that development proposals should be evaluated through performance standards addressing stormwater management, wastewater treatment, natural resource protection, and hazard resilience, all of which can be addressed during future permit review for site development and construction.

Based on the former, it is found that the requested amendment is consistent with the Comp Plan's goals for coordinated land use planning, economic development, efficient use of land resources, and tourism development, subject to compliance with all applicable environmental, infrastructure, and permitting requirements during subsequent development review.

Recommendation

The Department of Planning and Natural Resources recommends the following:

Pursuant to Title 29 Virgin Islands Code, Chapter 3, Section 238, Official Zoning Map No. STZ-7 for the island of St. Thomas be amended by changing the zoning designation of Parcel Nos. 2N-1 and 2N-2 Estate Bakkerø, No. 5 Frenchman's Bay Quarter, St. Thomas consisting of 1.37 acres, as described on survey drawing No. G9-3048-T80 from R-1 (Residential-Low Density) to R-3 (Residential-Medium Density).



Jozette J. Walker, CPM
Assistant Commissioner

8.6.2026

Date

Cc: Jean-Pierre L. Oriol, Commissioner