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RESPONSES TO DPNR CONCERNS REGARDING PROPOSED REZONING

Adrian's Geste—Estate Adrian, St. John, U.S. Virgin Islands

CCZP0048-26

Adrian Emprise, LLC respectfully submits the following responses to the questions identified by the Department of Planning and Natural Resources (DPNR) regarding the proposed rezoning and development of the Adrian's Geste acreage in Estate Adrian. The proposed rezoning is intended to establish a framework for a carefully planned, neighborhood-scale, mixed-use community incorporating attainable housing, local-serving commercial uses, permanent green space, and coordinated access and circulation.

1. **Land Use Compatibility:** *how the proposed rezoning and development are compatible with the surrounding residential neighborhood and consistent with the character of Estate Adrian.*

The overarching vision for Adrian's Geste is to create a place that serves the people who live on St. John year-round and that fits appropriately into the existing fabric of Estate Adrian. The location and surrounding development pattern are therefore important to understanding the proposal's compatibility with Estate Adrian. To the north are the hills of Catherineberg and, including private residences served by local access roads connecting to Centerline Road. To the south are additional lands within Estate Adrian owned by members of the Sprauve family and others. To the east are residential housing, the school site, and wooded lands, and farther toward Cruz Bay are additional residential settlements and commercial establishments. Adrian's Geste is intended to respond to this surrounding context, to complement, rather than to displace, the surrounding residential community. The proposed rezoning is thus not intended to create a resort, large commercial strip, destination-oriented development, or second Cruz Bay. Rather, Adrian's Geste is envisioned as a neighborhood-scale, mixed-use community within an area where residential life, transportation, history, community uses, natural lands, and limited commercial activity already intersect.

Residential Character

Housing is a core foundation of Adrian's Geste and is intended to reinforce the existing residential character of Estate Adrian. To achieve this, the proposal contemplates a range of housing opportunities, including studio and one- to three-bedroom apartments, condominiums, and single-family homes, with opportunities for long-term rental and homeownership. This variety is intended to accommodate the diverse needs of different households and stages of life, such as young adults, working families, seniors, teachers, healthcare workers, local business owners, service employees, and other year-round residents. By creating more opportunities for attainable housing, long-term rentals, and homeownership, the proposal seeks to strengthen the residential function of the area and support St. Johnians as they remain rooted on the island and build long-term community ties. The proposed rezoning therefore does not aim to replace the residential identity of Estate Adrian with a predominantly commercial or visitor-oriented one. Rather, housing remains a central organizing element of the overall community.

Neighborhood-Serving Commercial Component

The commercial component is intended to support the residential community rather than function as an independent tourist destination or large-format retail center. The potential neighborhood-serving uses include groceries, pharmacy and health-related services, banking, professional offices, childcare services, small restaurants, personal services, locally operated shops, and other everyday goods and services needed by current and future residents. Locating these services near housing and the established transportation routes can help create a more complete and functional community while potentially reducing the need for some residents to travel to Cruz Bay or to St. Thomas for basic necessities. Importantly, as discussed during the public hearing, the earlier conceptual depiction of buildings reaching six stories is not being pursued as the current commercial development concept. The present vision is for a compact, two-level commercial component, allowing the property to accommodate the aforementioned neighborhood-serving uses efficiently. This reduced-scale approach is an important component of the applicants' response to potential compatibility concerns. It reinforces the intention that the commercial component remain subordinate to the overall neighborhood and community character of Adrian's Geste.

Architecture, Landscape, and Community Space

Estate Adrian is strongly defined by its natural landscape, and the project is intended to blend with that setting rather than visually separate itself from it. In that spirit, the architectural concept incorporates natural and island-appropriate materials and finishes, including wood, stone, painted stucco, and earth tones. These materials—together with the use of appropriate building forms, landscaping, and scale—are intended to create a strong visual relationship with St. John's established residential and environmental character. Furthermore, the project also incorporates shared green space with native shade trees, seating, and gathering areas intended for everyday use by residents and the members of the St. John community. These spaces are intended to support informal gathering, conversation, recreation, shade, and other forms of community interaction that are part of everyday island life. The inclusion of permanent green space also helps maintain an appropriate balance between developed and landscaped areas and provides opportunities for buffering and transition between the different uses within and around the project.

Coordinated Neighborhood-Scale Development

The overall concept of Adrian's Geste is one of integrated neighborhoods rather than a collection of separate residential and commercial projects. This concept is consistent with the broader planning principle of a mixed-use mid-island center that is outlined within the 2024 Comprehensive Land & Water Use Plan (USVI Comp Plan). The detailed relationship between Adrian's Geste and the USVI Comp Plan is addressed more fully in response to question five; however, the key point related to land use compatibility is that the project is intended to integrate housing and everyday services within a coordinated, appropriately scaled community setting—within the existing fabric of Estate Adrian—rather than create another concentrated destination center. This coordinated approach provides greater opportunity to manage building placement, scale, access, parking, landscaping, buffering, and the relationship between new

development and existing residences through subsequent site planning and permitting while maintaining an appropriate relationship to surrounding residences, the natural landscape, and the broader community character of Estate Adrian.

2. *Traffic and Operational Impacts:* *potential impacts related to traffic, noise, vehicle operations, emissions, and other activities associated with the proposed use, including any proposed mitigation measures.*

The applicants recognize that any development involving residential and commercial uses must be evaluated for its potential traffic, noise, vehicle operations, emissions, and other operational impacts. Because the purpose of this project is to meet the daily needs of nearby and surrounding residents rather than attract substantial visitor-oriented traffic, the commercial component is intended to be neighborhood-serving, including small-scale local businesses and services. This approach may also reduce existing travel demand to Cruz Bay or off-island for basic goods and services by locating groceries, pharmacy and health-related services, and other everyday needs closer to residents. Furthermore, the project's walkable, mixed-used design is intended to allow residents to address multiple daily needs within a single trip, allowing some trips to be shortened, consolidated, or avoided altogether. In other words, as it relates to traffic, Adrian's Geste has been specifically conceived at a scale and with a mix of uses that avoids the impacts typically associated with large-scale destination or resort development.

With respect to noise concerns and vehicle operations, future development is intended to be managed through appropriate site planning, the development of operating requirements, parking and circulation design, and applicable permitting requirements. Commercial uses will be subject to the requirements pertinent to their specific use and location. Potential impacts associated with vehicle emissions, noise, deliveries, loading, lighting, waste collection, and other operational activities will also be considered as individual uses and the site plan are developed. Where appropriate, mitigation may include coordinated delivery and service areas, internal traffic circulation to minimize unnecessary idling and vehicle conflicts, landscaping and buffering, appropriate parking and loading areas, lighting controls, and reasonable operational requirements for commercial uses. Specific mitigation measures will be refined based upon the uses ultimately proposed and the requirements of the applicable governmental review process.

Access and circulation will also be evaluated as part of the overall traffic-management strategy of the project. The current concept includes providing access through Eunice Sprauve Way while also considering additional ingress and egress connections from Centerline Road where technically and operationally appropriate. The consideration of additional access points is intended to reduce reliance upon Eunice Sprauve Way as the sole means of access and may provide an opportunity to distribute vehicle movements more effectively. That established, the applicants recognize that detailed traffic, drainage, environmental, and site-development review will be necessary as the project advances. Accordingly, the final development will be designed and modified, as necessary, to comply with the DPNR requirements and other governmental conditions addressing traffic, noise, emissions, drainage, environmental protection, access, and site operations.

The objective is not to suggest that impacts will be absent but rather to ensure that foreseeable impacts are identified, evaluated, and addressed through thoughtful site design,

access and circulation planning, operational measures, mitigation, and subsequent regulatory review and permitting processes.

3. ***Access and Infrastructure:*** *the adequacy of existing access roads to accommodate the proposed use and any planned improvements, maintenance provisions, or traffic management measures.*

Access is a central consideration in the proposed development concept. Adrian's Geste is located along Centerline Road, with the current concept providing primary access through Eunice Sprauve Way. Recognizing the importance of safe and efficient access to the proposed development, the applicants are also evaluating additional ingress and egress connections directly from Centerline Road where technically and operationally appropriate. The purpose of considering additional Centerline Road connections is to reduce reliance upon Eunice Sprauve Way as the sole means of access and to provide greater flexibility in distributing vehicle movements associated with the development. A properly designed multi-access system could also provide alternative access to different portions of the development and enhance overall circulation and emergency-access flexibility. Any additional connection to Centerline Road would be subject to appropriate engineering review, applicable access standards, sight-distance and safety considerations, traffic analysis, and approval by relevant governmental authorities. The applicants do not presume such connections will be approved; rather, they are proposing that the feasibility and potential benefits be evaluated as part of the site-development and permitting process.

The proposed access system provides an opportunity to coordinate vehicle movement through planned entrances, internal circulation, parking, and separation of residential and commercial activity. This is preferable to allowing individual users to establish disconnected or uncoordinated access arrangements. The applicants recognize final determinations concerning roadway adequacy, access design, sight distances, traffic operations, intersection safety, and any required roadway improvements will also be appropriately addressed through engineering and governmental review. The project's traffic characteristics should therefore be evaluated based upon actual uses, anticipated traffic volumes, access configuration, and final site plan. The final configuration will also be evaluated in conjunction with roadway conditions, intersection safety, pedestrian movement, emergency access, drainage requirements, and the relationship to surrounding properties.

Ultimately, the location and internal organization of the proposed development are intended to provide an orderly system for ingress, egress, internal circulation, and parking while minimizing unnecessary vehicle movements and conflicts with surrounding residential streets. The applicants believe that a properly designed access system utilizing more than one point of ingress and egress, where technically and operationally appropriate, could improve the traffic distribution and reduce the concentration of vehicle activity on Eunice Sprauve Way. As detailed site planning proceeds, the applicants will work with appropriate agencies to identify necessary access and drainage improvements, roadway requirements, signage, circulation measures, emergency-access provisions, and maintenance responsibilities that are associated with the development. Responsibility for maintenance of internal project roads and circulation areas, as well as any improvements required in connection with project access, will be identified through

final site planning, permitting, and any applicable governmental approval conditions. This will allow maintenance responsibilities to be clearly established in conjunction with final ownership, access, roadway, and infrastructure arrangements.

4. *Impacts on Adjacent Residents and Community Facilities:* *measures proposed to minimize adverse effects on nearby residences and community-serving facilities, including senior housing or care facilities.*

The applicants recognize the importance of protecting the nearby residences as well as the local community-serving facilities from unreasonable adverse impacts with the proposed development. The proposal responds to this concern through its neighborhood-scale approach and the integrated planning of residential uses, commercial activity, parking, circulation, and open space—all aimed at creating meaningful benefits for the people and institutions located in and around Estate Adrian. The development’s residential orientation, coupled with a modest neighborhood-serving commercial component as part of the larger planned community, is an important compatibility consideration. The intended users are primarily year-round residents, and the commercial component is intended to serve those residents rather than operate as a visitor-oriented destination.

Future site planning will provide appropriate consideration for the relationship between new buildings and existing residences, including building placement, scale, landscaping, buffering, parking, lighting, circulation, and the location as well as operation of commercial uses. Measures necessary to minimize noise, visual impacts, privacy concerns, and unnecessary vehicle activity at the interface with neighboring properties will also be evaluated, as explored in more depth in response to question three. The public green-space component also provides an additional opportunity to create separation, landscaping, shade, and community space within the development. The proposed park is intended to be a permanent, publicly accessible feature rather than an incidental one.

With respect to nearby senior housing or care facilities and other community-serving facilities, the applicants recognize the importance of maintaining a compatible relationship with such uses. Detailed site planning and operational measures will therefore be developed with particular attention to traffic, noise, lighting, privacy, pedestrian movement, etc. that could affect neighbors and sensitive institutions such as care facilities. The applicants are committed to addressing these critical relationships as ongoing part of the subsequent site-development and permitting process.

5. *Planning and Zoning Consistency:* *The basis for the rezoning request, including how it advances a public purpose, is consistent with sound planning principles (2024 Comprehensive and Water Use Plan), and does not constitute spot zoning.*

The foundation for the rezoning request is the need to establish an appropriate land-use framework for housing, neighborhood-serving services, open space, community uses, and economic opportunity for St. John’s year-round population. The proposed rezoning is intended to allow these elements to be planned together as part of a coordinated mixed-use community rather than developed independently or through a piecemeal pattern of growth. The applicants’

position is that the existing residential zoning does not provide sufficient flexibility to achieve this integrated community concept encouraged in the 2024 Comprehensive Land & Water Use Plan (USVI Comp Plan). The requested zoning framework would thus allow for a mixed-use community inclusive of housing, neighborhood-serving commerce, community uses, green space, transportation, parking, circulation, and infrastructure.

Public Purpose and Community Need

The public purpose underlying the proposal for rezoning and development is reflected in several interconnected community benefits. First, St. John faces significant housing challenges affecting its year-round population. The USVI Comp Plan identifies both housing availability and affordability as important planning concerns and recognizes the need for land-use strategies capable of supporting a broader range of housing opportunities. Adrian's Geste proposes a range of housing types intended to directly respond to those needs, including apartments, condominiums, and single-family housing, with opportunities for ownership and long-term rental. A diversity of housing types also responds to what the USVI Comp Plan identifies as the cultural preference of many Virgin Islanders who may choose single-family homes and smaller housing types.

Second, the proposal would provide neighborhood-serving commercial and community uses intended to meet daily needs closer to where residents live. Potential uses include grocery and convenience services, pharmacy and health-related services, professional offices, banking, small retail, personal services, food establishments, and other practical community needs. The goal is to also reduce the need for residents to travel to Cruz Bay or St. Thomas for certain basic goods and services while supporting a more geographically balanced pattern of community activity on St. John. The proposal also incorporates permanent green space as an integral part of the community rather than treating open space as an incidental remainder of development. The proposed green-space system includes native landscaping, shade trees, seating and gathering areas, permeable landscaping, and areas intended for everyday use by children, families, elders, and other members of the community. Finally, the proposal creates opportunities for local economic participation through avenues such as construction, local business activity, resident housing ownership, employment, and the circulation of more consumer spending within St. John.

Consistency with The Comprehensive Land & Water Use Plan (USVI Comp Plan)

In addition to serving a public purpose and addressing communities needs, the proposed project directly responds to planning concepts identified in the USVI Comp Plan. The Plan calls for the Territory to explore options for zoning reform that can facilitate needed services and housing within mixed-use island centers, with improved pedestrian access and reduced reliance upon existing concentrated centers such as Cruz Bay. The Plan describes mixed-use centers as creating a confluence of benefits through their design, mix of uses, and resulting community activity. Among the benefits identified are improved mobility and accessibility for people living within or near such centers, opportunities to reduce household transportation costs, support for more affordable housing, greater resilience in responding to climate-related challenges, and increased economic resilience. Adrian's Geste is intended to advance these planning objectives in a coordinated manner within a single planning framework.

The proposal also responds to the concept of a mid-island center along Centerline Road, providing an opportunity to locate housing, services, and other community functions outside the more concentrated Cruz Bay area. The intent is not to create a second downtown or a destination commercial center but rather a neighborhood-scale mixed-use center serving the everyday needs of residents in Estate Adrian and the surrounding areas. The proposal may also provide opportunities for additional governmental and community-serving functions near the Sprauve School new location, thereby supporting a more convenient concentration of services and reducing the need for some residents to travel greater distances, including to St. Thomas, for basic needs. In this respect, the rezoning is intended not simply to permit additional development but to establish a much-needed land-use framework, as the USVI Comp Plan encourages, through which the different dimensions of the proposed project can be planned and evaluated together.

Sound Planning and Coordinated Growth

Adrian's Geste is therefore intended to be thoughtful and comprehensive in its approach to growth. Housing, commerce, green space, transportation, infrastructure, and community uses are being considered in relation to one another rather than as isolated development decisions. This integrated approach provides greater opportunities to control how growth occurs, to address potential impacts before individual uses are established, and to establish appropriate relationships among development, surrounding residences, roads, infrastructure, and open space. Recognizing this, the proposal does not ask the community to accept growth without direction. It seeks a zoning framework that allows growth to be planned, reviewed, conditioned, and shaped around local needs.

The project is also intended to function as a year-round community rather than one dependent upon the strongest periods of the tourist season. Its focus is on the people who live and work on St. John, raise families, attend school, care for elders, operate businesses, and participate in the island's civic and community life. At the same time, by providing more opportunities to obtain goods and services locally, Adrian's Geste may help reduce economic leakage from St. John. When residents must leave the island to purchase basic goods or obtain services, some portion of that spending leaves the local economy. Increasing opportunities for locally based businesses and services can help retain more economic activity on St. John and support the USVI Comp Plan objective of creating economic opportunities that can empower residents and improve quality of life. The commercial and community components of Adrian's Geste are also intended to reflect the Plan's concept of the "economics of place" by connecting economic activity with the history, culture, physical setting, and community character of St. John.

The Proposal Should Not Be Viewed as Spot Zoning

Because of the emphasis on serving a public purpose and addressing known community needs, the applicants respectfully submit that the proposed rezoning should not be viewed as spot zoning. Spot zoning is generally associated with selecting out a particular property for zoning treatment materially different from the surrounding area primarily for the benefit of a particular owner or private interest. A frequently cited zoning-law formulation describes spot zoning as seeking a classification "totally different from that of the surrounding area for the benefit of the owner of such properties and to the detriment of others" (Anderson, *American Law of Zoning*). The circumstances presented by Adrian's Geste are materially different. The requested rezoning

is intended to establish a coordinated land-use framework for multiple contiguous parcels and complementary housing, neighborhood-serving commerce, community uses, green space, transportation, access, and infrastructure components—community as well as land-use planning considerations extending beyond the private interests of the property owner. For these reasons, the applicants believe the proposed rezoning advances sound planning principles, responds directly to objectives identified in the USVI Comp Plan, and should not be characterized as spot zoning.

6. *Community Character and Cultural Resources: How will the proposal preserve and respect the historical, cultural, and community character of the Estate Adrian area?*

The applicants recognize that the value of Estate Adrian is not defined solely by what can be built there. It is also reflected in the rich history of the land, the natural landscape that surrounds it, and the generations of St. Johnians who have lived, worked, gathered, and built community in and around Estate Adrian. For that reason, preservation, stewardship, and respect for both the historical and cultural context of the area are important components of the Adrian's Geste planning concept. This commitment is reflected in the treatment of archaeological and historic resources, the preservation and enhancement of green space, the proposed architectural and landscape character of the development, and the broader dedication to maintaining Estate Adrian as a place that continues to serve the St. John community.

Archaeological and Historic Resources

As noted during the public hearing, an archaeological study was previously conducted in connection with the subdivision of the larger Estate Adrian property. The known historic ruins were intentionally isolated within Parcel 17B rather than incorporated into the parcels proposed for more intensive residential and commercial development. The applicants will provide the available archaeological study to DPNR's appropriate historic-preservation staff for review so the prior findings can be considered and any additional archaeological or historic-preservation concerns can be identified and appropriately addressed. That established, prior archaeological work is not viewed as the end of the preservation process. Rather, it provides an important foundation for determining whether additional archaeological investigation, documentation, consultation, avoidance measures, or other protective measures may be appropriate as detailed planning and development proceed. The intent of Adrian's Geste is to allow the history of the land to help inform how future development occurs. Accordingly, the applicants remain committed to additional archaeological investigation, documentation, and protective measures where warranted by the findings of the existing study, subsequent review, site conditions, or applicable governmental requirements.

Parcel 17B, Historic Ruins, and Preservation of the Landscape

The broader Adrian's Geste concept includes and is adjacent to green space containing the historic Estate Adrian ruins. These historic resources should not be regarded merely as obstacles to development but as part of the historical landscape and character of Estate Adrian. The preservation of the known historic ruins within Parcel 17B provides an opportunity to maintain a physical and visual relationship between these historic resources and the broader

Estate Adrian landscape while protecting them from the more intensive residential as well as commercial components contemplated elsewhere within the project. This approach reflects an important principle of the overall development concept: growth does not require the removal or disregard of the features that give Estate Adrian its unique identity. Instead, historic resources, landscape, open space, and new development can be considered together as part of a truly coordinated planning framework.

Green Space, Landscape, and Continuing Community Life

The proposed green-space system further reflects the applicants' overall commitment to preserving and respecting the character of Estate Adrian. The concept includes native shade trees, seating, and gathering areas throughout the development that are intended for everyday use by children, families, elders, and other members of the community. These areas are intended to be functional community spaces rather than merely decorative landscaping or residual areas left after development. In this sense, preserving community character is not limited to protecting historic structures and archaeological resources. It also involves creating and maintaining places where community life can continue to occur. The proposed green and gathering spaces are therefore intended to provide opportunities for neighbors and residents to meet, rest, gather, and maintain the types of social connections that contribute to a living community. The use of native vegetation and permeable landscaping is also intended to maintain a strong relationship between the developed areas and the natural environment. Permeable landscaping can support groundwater recharge, reduce the extent of impervious surfaces, and complement the project's broader approach to stormwater management and environmental stewardship. Together, the historic-resource areas, permanent green space, native landscaping, shade trees, gathering areas, and environmentally responsive site-design measures are intended to help Adrian's Geste remain physically and culturally connected to the landscape and people of Estate Adrian.

Architectural and Cultural Sensitivity

The proposed design approach is likewise intended to respect St. John's established architectural and environmental identity. The concept contemplates natural materials, including wood, stone, and painted stucco in appropriate earth tones, together with building forms, landscaping, and scale intended to relate appropriately to the surrounding community. The objective is not to replicate historic architecture or create an artificial representation of the past but to develop an architectural vision that is responsive to St. John's climate, landscape, materials, scale, and community character. All of this is connected to the goal of Adrian's Geste functioning as a year-round community serving people who live and work on St. John rather than as a resort or destination-oriented development. This community orientation is itself important to preserving the character of Estate Adrian by providing housing, neighborhood-serving uses, green space, and gathering areas intended principally for the people who call St. John home.

A Continuing Tradition of Stewardship and Community Benefit

The applicants also view Adrian's Geste within the rich history of stewardship associated with the Sprauve family's relationship to Estate Adrian. That history dates to 1944, when Dr. Gehardt Sprauve acquired the Estate. Over the subsequent years, portions of the family's landholdings were used in ways that served broader community purposes. This included the

provision or donation of lands associated with what became part of the Virgin Islands National Park, George Simmonds Terrace, and the Baptist Boys Home at Estate Adrian. The significance of this history to the present application is not that prior family ownership, standing alone, establishes a basis for rezoning. Rather, it provides important context for the stewardship philosophy underlying Adrian's Geste: that land can be managed not only as a private asset but also as a resource capable of providing lasting community benefit. Adrian's Geste is intended to continue that tradition in a contemporary form by using the property to help address housing needs, provide neighborhood-serving goods and services, create permanent green and gathering spaces, support local economic opportunity, and preserve an appropriate relationship with Estate Adrian's historical and natural landscape.

The applicants respectfully submit that, for Estate Adrian, preservation and development need not be competing objectives. The concept behind Adrian's Geste provides an opportunity to accommodate needed housing and community-serving uses while protecting known historic resources, considering additional archaeological requirements, maintaining permanent green space, incorporating native and permeable landscaping, creating places for everyday community life, and designing new development in a manner responsive to St. John's established character. The preservation of known historic ruins within Parcel 17B, review of the existing archaeological study, commitment to additional investigation or protective measures where warranted, and integration of historic and natural resources into the broader planning concept also demonstrate that preservation is intended to be an active component of the proposed project rather than an afterthought.

Through these measures, Adrian's Geste is intended to respect the historical, cultural, environmental, and community character of Estate Adrian while serving the needs of present and future generations of St. Johnians. Adrian Emprise, LLC remains committed to working with DPNR and the other appropriate agencies through subsequent planning, engineering, environmental, permitting, and site-development review to ensure that the final project incorporates all required measures necessary to address traffic, noise, emissions, drainage, environmental protection, neighborhood compatibility, access, roadway and circulation maintenance, archaeological and cultural resources, and other applicable concerns. The requested rezoning should therefore be considered as a land-use framework for a carefully planned community, not as approval of unrestricted development, and the applicants respectfully request DPNR's consideration of the application on that basis.