

The St. Thomas Reformed Church

St. Thomas, U.S. Virgin Islands

October 1, 2026

Leia LaPlace
Territorial Planner
Division of Comprehensive and Coastal Zone Planning
Dept of Planning & Natural Resources
St Thomas, Virgin Islands

Dear Ms. Laplace,

I am writing on behalf of the St Thomas Reformed Church, located on the corner of Nye and Crystal Gade in downtown St. Thomas, to formally express our objection to the proposed rezoning request for **Commandant Gade #3 and Crystal Gade #1**.

St. Thomas Reformed Church owns property in the immediate neighborhood, and would be directly affected by the proposed development, its construction activities, and its eventual operation.

Our concerns are based not simply on the proposed use itself, but on the apparent inconsistencies surrounding the project, the lack of a clear and adequate parking solution, the anticipated increase in traffic and transient activity, construction impacts, and the potential effect on public safety, sanitation, and the quality of life of the surrounding residential community.

1. Proposed Use and Operational Model
The rezoning application is presented as a guest house/hotel development. However, representations made during the neighborhood meeting indicated that the facility is intended to operate more like an unstaffed, Airbnb-style short-term rental property. We believe this distinction is important.

A traditionally operated hotel and an unstaffed short-term rental facility can have substantially different operational characteristics, management, security, parking, trash collection, maintenance, and emergency response.
If the actual intended operation is an unstaffed short-term rental facility, that operational model should be clearly identified in the application and evaluated accordingly. The community should not be asked to evaluate a hotel proposal while the intended operation is represented separately as an Airbnb-style facility.
We respectfully request that DPNR require the applicant to clearly reconcile the written application with the operational model represented to the neighborhood before considering approval of the rezoning.

2. Lack of a Clear, Dedicated Parking Plan
Parking is one of the area's most significant concerns. During the neighborhood meeting, the applicant indicated that the proposed development would not have dedicated on-site parking. This appears to conflict with representations in the written proposal indicating that parking would be provided. This discrepancy needs to be resolved before the rezoning request is considered further. The surrounding neighborhood already has limited parking capacity. A short-term rental operation could generate frequent vehicle arrivals and departures, particularly

during guest check-in and check-out periods, as well as additional vehicle activity from cleaning, maintenance, delivery, and other service providers.

The suggestion that guests could utilize Crystal Gade #3, a government-owned property whose ownership is also being contested by the Church, does not provide an appropriate or reliable parking solution.
Furthermore, access to that parking area is currently restricted, with the gate closed during weekdays. It therefore cannot reasonably be treated as guaranteed parking for a commercial lodging operation without a formal, legally enforceable arrangement establishing the property's availability, access, and continued use.

The applicant should be required to demonstrate that the proposed development can provide adequate parking without relying upon surrounding public property or placing additional parking pressure on residential streets.

3. Traffic and Neighborhood Safety
The proposed development would introduce a transient lodging use into an established residential area.
Unlike a conventional residence, a short-term rental can involve a continuous turnover of occupants who are unfamiliar with the neighborhood, its roads, parking limitations, and surrounding properties. This can result in repeated vehicle arrivals, departures, passenger drop-offs, deliveries, and service-provider traffic.
The addition of this activity should be evaluated in the context of the existing capacity of the neighborhood's streets and parking areas. We are particularly concerned that the absence of dedicated parking could result in guests parking on surrounding streets or in areas not intended for guest parking, potentially obstructing access for residents and emergency vehicles.

Before approving a zoning change that would permit this use, we respectfully request that DPNR require adequate consideration of traffic circulation, emergency access, parking capacity, and pedestrian safety.

4. Construction Impacts and Staging
We are also concerned about the proposed construction period. We understand that construction could begin approximately six to nine months following approval and that construction staging is anticipated to occur on the property identified by P&P as Commandant Gade #2AB, which is identified on mapping records as Crystal Gade #2AB and is located directly behind the Church. **This raises significant questions regarding construction access, equipment staging, deliveries, material storage, worker parking, noise, dust, debris, and the effect of construction vehicles on the surrounding neighborhood.**

Before approval, the applicant should be required to provide a clear construction logistics and staging plan identifying:

- The precise parcel to be used for staging;
- How construction vehicles will enter and exit the site;
- Where construction workers will park;
- Where construction materials and equipment will be stored;
- How pedestrian and vehicle access will be maintained;
- Measures to control noise, dust, debris, and construction runoff; and
- How the Church's property and the surrounding residential properties will be protected during construction.

The apparent discrepancy between the parcel designation stated by the applicant and the designation reflected in mapping records should also be resolved before any approval is granted.

5. Public Safety and On-Site Management
The proposed unstaffed operating model raises additional concerns. If there will be no permanent on-site management, there should be a clearly identified local person or company responsible for responding promptly to guest issues, emergencies, noise complaints, security concerns, property damage, and other problems. The neighborhood also has existing concerns regarding lighting and police coverage. The applicant should therefore be required to provide an appropriate lighting and security plan that protects both guests and surrounding residents without creating excessive lighting impacts on neighboring residential properties.

6. Trash and Sanitation
Short-term lodging also creates ongoing waste-management considerations. Guest turnover can produce significantly more frequent trash generation than a single residential household. In the absence of on-site management, there is an additional concern regarding who will be responsible for ensuring that trash is properly contained, placed for collection at appropriate times, and removed promptly. We ask that a specific waste-management plan be required before approval, including provisions for adequate containers, collection frequency, and responsibility for maintaining the property and surrounding area free of accumulated waste.

7. Long-Term Implications of the Rezoning
Finally, we believe DPNR should consider the long-term implications of changing the zoning designation of these parcels. The issue before DPNR is not simply whether the current applicant's proposed project can be constructed. A zoning change establishes what types of uses may be permitted on the property in the future. For that reason, the community's concerns should be evaluated in terms of the broader implications of introducing a lodging/commercial use into this area, including the resulting traffic, parking, transient occupancy, infrastructure demands, and effects on neighboring properties.

Request for DPNR Review
For the reasons outlined above, St. Thomas Reformed Church respectfully requests that DPNR not approve the proposed rezoning without first requiring the applicant to provide clear and satisfactory documentation addressing the outstanding concerns.

At a minimum, we respectfully request that the following matters be resolved before any favorable consideration of the rezoning:

1. **Clarification of the actual proposed use and operating model**, including whether the property will function as a staffed hotel, guest house, or unstaffed short-term rental facility;
2. **Resolution of the discrepancy regarding parking** between the written proposal and statements made during the neighborhood meeting;
3. **A binding, dedicated parking plan** that does not depend upon Crystal Gade #3 or other government-owned property whose availability and access are not guaranteed;
4. **A traffic and access assessment** addressing guest traffic, service vehicles, emergency access, and the capacity of surrounding roads;
5. **A detailed construction staging and logistics plan**, including clarification of the precise parcel proposed for staging;
6. **A clear local management and emergency-contact plan** for the operation of an unstaffed facility;
7. **A lighting and security plan** addressing both guest safety and impacts on neighboring residences; and
8. **A comprehensive waste-management plan** addressing guest-generated waste and ongoing property maintenance.

The St Thomas Reformed Church supports responsible development and recognizes the importance of allowing property owners to make appropriate use of their property. However, development should also be compatible with the existing neighborhood and should not shift the burden of inadequate parking, traffic management, security, sanitation, or infrastructure onto surrounding residents and property owners.

As the owner of property in the immediate area, St. Thomas Reformed Church has a direct interest in ensuring that any zoning change is carefully evaluated for its impact on the safety, accessibility, and quality of life of the surrounding community.

We respectfully request that this letter be entered into the public record for the Commandant Gade #3 & Crystal Gade #1 rezoning application and that the concerns outlined above be fully considered before DPNR makes its recommendation.

Thank you for your consideration.

Sincerely,

Chantal Richards Figueroa
Vice President,
St Thomas Reformed Church Consistory