

January 7, 2026

HONORABLE MILTON E. POTTER
Senate President/Chairman, Committee of the Whole
36th Legislature of the United States Virgin Islands
Capitol Building, Charlotte Amalie
St. Thomas, U.S. Virgin Islands 00802

Via Email: mpotter@legvi.org

RE: COMMENTS ON THE ZONING APPLICATION NO. CCZP0091-25, ESTATE BAKKEROE, ST. THOMAS

Dear Senate President Potter,

I am writing to you with regards to the subject application for a Zoning Amendment of various lots in Estate Bakkeroe, St. Thomas, Virgin Islands. I am writing as a local resident living adjacent to this site as well as on the behalf of Juliette Kean, Catherine Kean, and Michael Kean, who own six parcels of land and where they have resided for over 40 years.

The Department of Planning and Natural Resources (DPNR) has assigned the rezoning application with the number CCZP0091-25. The applicant's name is listed as Sweet Grass Valley Properties, LLC, with an address on St. Croix, Virgin Islands. The total area being considered for rezoning is approximately fourteen (14) acres.

I listened to the recording of the virtual hearing held by DPNR and I am appalled that this abomination has made it thus far to be considered for rezoning. These parcels for many years have been under discussion by previous owners for rezoning for what amounts to be commercial uses. These initiatives have always been defeated through the efforts of residents in the neighborhood that have pointed out the incompatibility of proposed uses with the significant single family RESIDENTIAL neighborhood surrounding these parcels of land. This particular request to change the current zoning from R-1/Low-Residential Density to R-3/Medium-Residential Density is also incompatible with the surrounding neighborhood. The applicant has stated in its application that the use of the property will be for workforce housing. This is just another label for what it will be, a trailer park.

This application lacks sufficient details to evaluate the impact it will have on the surrounding neighborhood and ecosystem. The applicant shows only a Conceptual Site Plan that indicates 15 buildings that will house 30 individuals in each building for a total of 450 people. There are also plans for several Common Use Buildings that include a dining hall and laundry facilities. The site plan also shows a total of 225 parking spaces. Grossly apparent is the statutory parking requirement is not being met. It is half of what is required for 450 people. The better question is: Where will the rest of the individuals park? On the neighborhood roads...? Even if the owner suggests there won't be a need for additional parking because of the use of alternative means of transportation, there will be a significant increase in congestion and noise.

The overall presentation lacks information regarding the impact upon the site. The property-owners' representative purposely left out a significant amount of information presented at the Public Hearing. It was as if they were hiding how terrible this development will be. They stated the development will only be where the existing temporary staging area is located. The existing staging area is at best only 6% of the total area being proposed to be developed. However, the actual developed area is 94% greater than this existing area. This obviously is a much larger development of the property for commercial purposes than was presented at the virtual hearing.

There exists a delicate ecosystem of old-grown native trees, watershed, and possibly indigenous endangered species that must be studied, assessed and determine if this site plan is appropriate for this project. There is no grading shown on the site plan, so it is impossible to determine the impact of cutting and filling on the hillside. What is also lacking is a Cultural Resources Survey. This is done to determine if there are any historical or pre-historical features that must be identified and preserved. This is an item that has been a cornerstone of zoning amendments ever since the debacle of the Tutu Park Mall when it was rezoned in the 1980s. It was discovered during construction that it was being built over an indigenous village of 1000 years old. This treasure of our history and culture is currently buried under a parking lot. We don't want to have a repeat of historical artifacts being sacrificed in the name of progress.

The R-1 residential district allows for two-residential units per half acre if a group dwelling is done. The density proposed here is more than two and a half times the allowance in this district. While the requirements for submitting these drawings for a zoning amendment are conceptual, the complete application shows they have already designed and bid out the development. It is as if this approval is just a formality. Even so, as stated earlier, the information on the Civil Design and the site facilities are lacking to understand the full impact. The applicant in their conceptual Drawings and application state they will be discharging their wastewater sewage into a municipal system. There is no such system in this area. This means the applicant will need to construct a wastewater-treatment plant to handle the sewage disposal. A review of the proposed site plan shows there is not enough opened area left for the discharge of effluent.

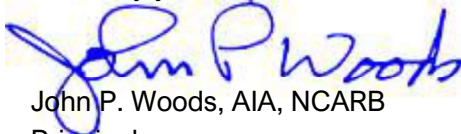
The applicant has stated that workforce housing is needed for the multi-national contractors that will be coming into the Territory to work on the significant FEMA projects that include new schools, hospitals, other government buildings, and horizontal infrastructure. They claim the federal funding could be in jeopardy if this application is not approved. This is a scare tactic. The federal funding is not contingent upon this application being approved. There are more suitable areas around the island where work force housing can be developed. In the meantime, if allowed, this will destroy an established neighborhood that is over fifty years old. I make an assumption of the other types of issues this development will bring regarding noise, pollution, congestion, and an increase of criminal activity.

The Disaster Recovery program is likely to continue for another six to ten years. The property values surrounding this site will plummet severely if this development is approved. Additionally, it is the property owners' intention to remove these buildings after Disaster Recovery program is finished and construct a development within the R-3 zoning district. The R-3 zoning is one of the most flexible in the Territory that allows for a huge multitude of usage. It is the zoning district where apartment buildings, hotels, and other

dense residential structures are built. More importantly, the R-3 zoning district allows for up to six-story buildings. This means that the surrounding residents of this proposed blight will have their views blocked by future developments in the not-so-distant future.

In conclusion, this plan is merely a speculation on the part of an interloper; someone who has no connection to St. Thomas and its residential neighborhoods. We live here. We must be heard. It must be denied.

Sincerely yours,



John P. Woods, AIA, NCARB
Principal

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