

Ms. Leia LaPlace
Territorial Planner
leia.laplace@dprn.vi.gov
tel. 340-774-3320 ext. 2215

USVI Department of Planning and Natural Resources
Division of Comprehensive and Coastal Zone Planning
#45 Mars Hill
Frederiksted, VI 00840-4474

18 December 2025

RE: CCZP0085-25 (15 Susannaberg Rezoning Request)

Dear Ms. LaPlace:

Thank you for this opportunity to provide public comment on the above rezoning application requested by Mr. Ronnie Jones/ Susannaberg LLC. On 3 December, I was informed the public comment period was extended through 21 December 2025.

I understand Mr. Jones wishes to amend the zoning map to change his 2.967-acre parcel adjacent to my property (19 Susannaberg) from R-4 to R-3 to develop a 48-key hotel/guesthouse. **I support the approval of the zoning change, with and only with the inclusion of the three conditions below.** If these proposed conditions are not acceptable to the applicant, I'd like to understand why.

1. **15' setback**, as presented by the architect in the 25 November 2025 public hearing and illustrated in the conceptual site plan submitted as part of the application.
2. **Height limitation of 3-floors**, as granted as-of-right in the current R-3 designation, and as presented in the development plans presented by the architect in the same public hearing.

Requirement to contain and manage stormwater and waste at the property line **through the installation of a fence (at the applicant's cost) during construction and regular operations, and a surface water berm** to retain stormwater on the property.

Justification for the requested conditions is provided below. The December 2024 Comprehensive Land Use & Water Use Plan (CLWUP) advocates against spot zoning, and there are no R-3 or R-4 parcels adjacent to 15 Susannaberg. Commercial, business or

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medium-density residential approved zoning map changes are concentrated adjacent to or very near Centerline Road (Route 10).

1. Zoning District and Parcel buffer/ separation- require 15' setback.

- a. The 1972 official zoning map shows 15 Susannaberg and adjacent parcels, including the neighboring Adrian Estate) in an R-1 (low density) zoning district. R-1 parcels must include a 15' setback on all sides and require a minimum lot area of one-half acre. As minimum lot size decreases to 10,000 square feet (R-2), 6,000 square feet (R-3) and 3,000 square feet (R-4), the setback requirements are reduced and eventually eliminated for the medium-density designations, built on an understanding that in more dense and urban neighborhoods, **lot-line and a continuous street wall construction** is desirable from a placemaking and walkability perspective. The submitted site plan does not propose this urban approach; it includes standalone buildings. **Thus, there is no justification not to provide 15' setbacks**, especially adjacent to sensitive National Park lands and neighboring R-1 zoned parcels. The site plans presented in this public hearing recognize the importance of this buffer, and the 15' setback should be formalized with conditional approval of the rezoning request.
- b. In 2013, when I purchased the property, the initial survey identified an unpermitted structure straddling the property line. Prior to closing, a portion of the structure was removed, as documented in the **attached title survey** by BGM Engineers & Surveyors. This structure was not represented in the 2022 as-built survey of existing conditions presented in the November 2025 public hearing. The topographic lines, vegetation and other information in the narrow portion of the 15 Susannaberg parcel, adjacent to Parcel No. 19, are not visible. This is an **inequitable boundary condition** that would not be permissible if there was a required setback. This should be addressed with **mirrored requirements at the boundary between Zoning Districts**, in this instance R-1 and R-3 (low and medium density).
- c. The MapGeo aerial provided with the zoning application shows land was cleared beyond the extents of the property line from parcels 15 and 18. These areas are currently occupied by tenants managed by Mr. Jones, including **structures** (an occupied wood house and a shipping container) and **vehicle parking, boat storage and an auto-wrecking facility**, where service, storage and dismantling of used motor vehicles is currently in operation. The latter is

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not permitted in a Residential Zoning District. This **encroachment** is concerning and would also be somewhat addressed with a setback.

Beginning in 2022, I have repeatedly asked Mr. Jones to remind his tenants to respect the property line. On multiple occasions, he volunteered to visually identify the property line, but as you can see from the **attached photos** encroachment onto my property has been a repeated concern. A standard 15' setback would address this concern.

2. Medium density zoning criteria- limit height to three-stories. The applicant has requested the zoning district change for the purpose of a boutique hotel. Although a use-variance (Section 238a. Variances by the Legislature) within the current zoning district appears to be a more appropriate request, that is not what was filed. As a result of the zoning map amendment, any permissible use or Development Provisions in the R-3 zone will be allowable, as-of-right.

- a. The applicant has not requested, nor proposed to develop more than three-stories, and the allowable six-stories in R-3 would be **out of character** for this low-density, predominantly R-1 portion of St. John.
- b. During the public hearing, the applicant's architect, Mr. Kurt Marsh described the design as, "a low-profile structure, three levels at max, and they will terrace the hillside... with a minimalist impact on the view shed."
- c. A six-story tower on the ridge, at the edge of the park would be significantly visible from the North Shore. **Even the largest St. John hotels** (Westin and Caneel) nestle their buildings into the landscape and did not develop to this maximum allowable height.

3. Protection of natural resources and water quality- require a fence and surface water berm along the zoning boundary between R-1 zoned properties to contain contaminated surface runoff, trash and automotive contaminants from the adjacent gut, during construction and normal operations. The fence should be provided by the applicant and grading must contain stormwater within the property boundary.

- a. The natural topography of the land slopes from the planned parking area to the rear of parcel 19. That area includes a **gut, a sensitive natural asset** connected to the St. John watershed and hydrology cycle. It is important to keep these naturally wet areas pollution-free to maintain health of the soil and water quality for public health concerns, environmental concerns, as well as for the benefit of native plants and animals that inhabit this area. A landscaped area and physical screen is required for operational parking lots, but I'm also concerned about erosion and sedimentation **during**

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construction, especially with the previous land clearing on my side of the property line without my permission.

- b. **Trash** from the above-mentioned auto-wrecking facility has already crossed the property line and **contaminated the gut**. As shown in the **attached photos**, I've seen food wrappers, oil containers, aerosol spray cans and automotive lubricant containers in the gut. A fence and berm will prevent the wind and water from carrying trash and pollution from adjacent properties onto my land.
- c. **Section 230. Off-Street Parking and Loading Regulations** "... off-street parking and loading facilities be developed in a manner compatible with the **adjacent** uses of land as well as the use of land it serves in accordance with the environment intended for the district in which such a facility is located." (VI Code/ Title 29/ Chapter 3/ Subchapter I/ Section 230/ paragraph (a)- Intent of Regulations). This is an **especially sensitive issue, given the zoning boundary** between medium and low-density residential and the intent to run a **commercial hotel/ guesthouse immediately adjacent to parcels zoned for single family homes**. With 48 guest rooms, a minimum area of **14,400 square feet of surface parking should be provided**. **Additional parking will be required for every 1 in 5 employees**. The planned parking area must be "paved or otherwise surfaced so as to dispose of surface water... No surface water from any parking area shall be permitted to drain onto adjoining property." (Section 230, paragraph (b)). By right, the applicant could plan more than 48 keys, which would result in an even bigger parking area. Without an expensive drainage system, this would be difficult to achieve without a setback and bermed area to contain the runoff and polluted surface water. This is especially concerning to me, as the development has **planned parking for the entire area adjacent to my property**.

Despite the concerns and grievances noted above, I support **conditional approval** of the requested zoning change of 15 Susannaberg from R-4 to R-3. I respectfully request the approval of this zoning map amendment include **the above three conditions**. Based on experiences since the purchase of this property in 2013, these additional conditions are required to "[promote] the health, safety, morals and general welfare of the community" (Title 29/ Chapter 3/ Subchapter I/ Section 222. Purpose and scope).

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Furthermore, Section 238 (Amendments), states, “after receiving a necessary zoning change from the Legislature, the owner of the property that plans a development on such property as the reason for such zoning change **shall begin construction within thirty-six (36) months** after receiving all the necessary permits pursuant to the Virgin Islands Code; **if construction has not commenced within the aforesaid time period, the owner will again have to obtain the approval of the Legislature** as provided under this section.” Since the land is currently undeveloped, with a small campground and washroom facilities (permitted uses in R-1 and R-2 but not in R-4), **the parcel should revert from the R-4 designation to R-1 as shown in the 1972 official zoning map**. During the 25 November public hearing, the applicant stated the R-4 zoning map amendment was approved in 2006 for the purposes of a six-unit dwelling. This has not been realized, and we are well beyond the three-year construction start requirement.

Thank you again for the opportunity to provide feedback and comment. I look forward to hearing the applicant’s response, and the recommendation of DPNR.

Sincerely,

Julie 
Hiromoto 

Digitally signed by
Julie Hiromoto
Date: 2025.12.18
22:15:14 -06'00'

Cc: [Keshoi Samuel](#) and [Gail Pagan](#) (DPNR)
[Mr. Ronnie Jones](#) (Susannaberg LLC)
[Ms. Shikima Jones-Sprauve](#) (St. John Administrator, USVI Governor’s Office)

Attachments:

- Exhibit A- unpermitted structure not included in presented as-built conditions (title survey, MapGeo aerial, photographs)
- Exhibit B- Encroachment documented in photographs from 2013, August 2022, March 2023, March 2025
- Exhibit C- Automotive and other trash in the gut at the rear of my property (19 Susannaberg) documented in photographs from 2023 and 2025.

Exhibit A- Unpermitted structure not included in presented as-built conditions

15 Susannaberg As-Built

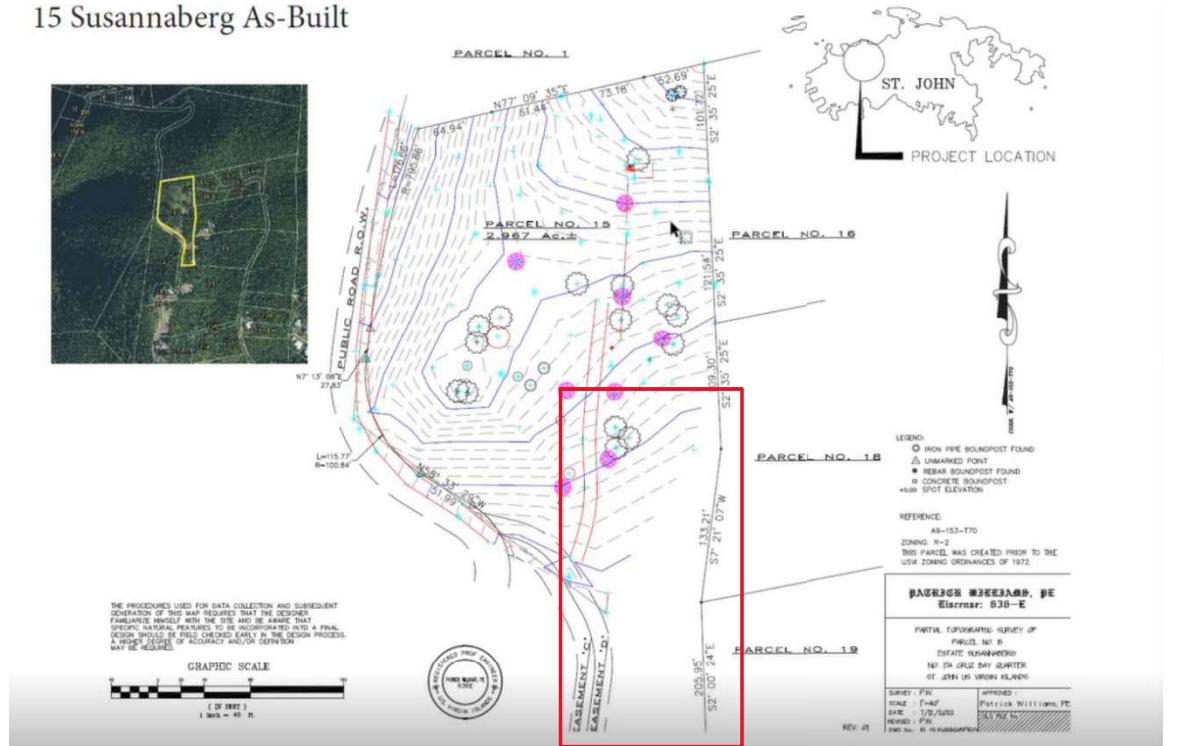


Figure 1A: 25 November 2025 Public Hearing presentation included an incomplete survey which did not show the unpermitted structure on the property line bordering 19 Susannaberg.

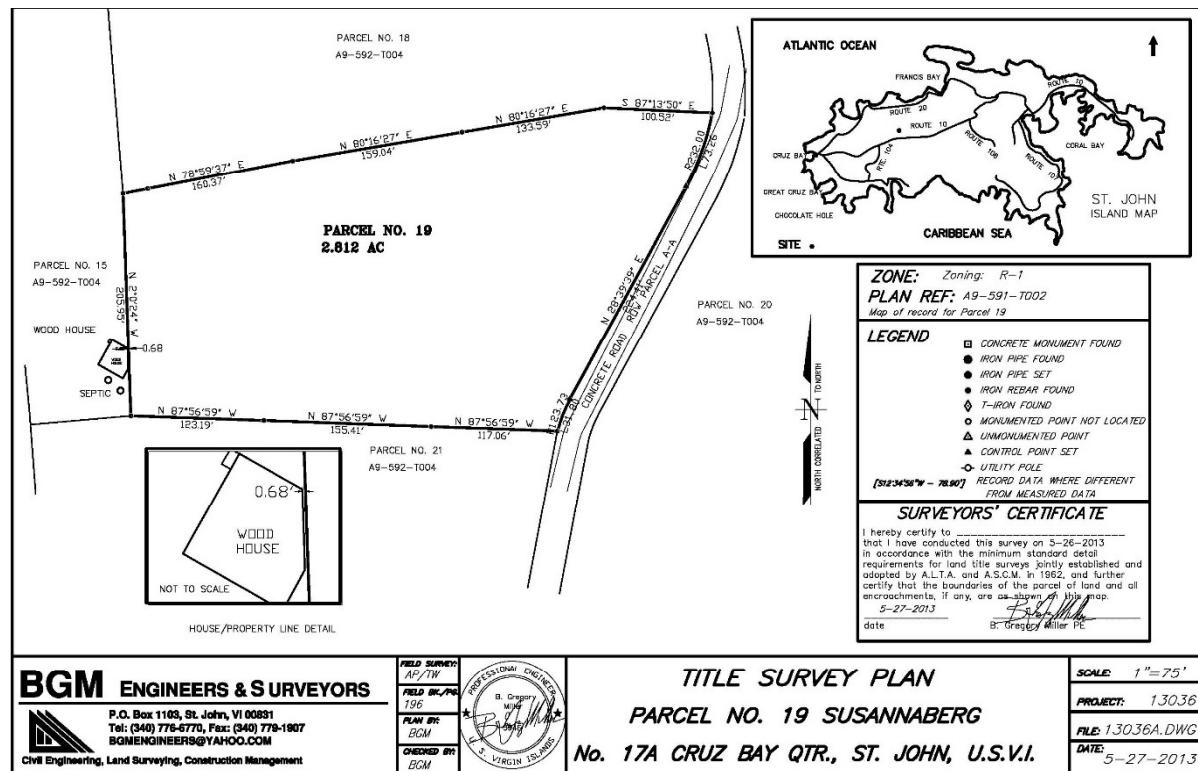


Figure 2A: 2013 title survey provided by BGM Engineers & Surveyors at purchase of 19 Susannaberg.

Exhibit A- Unpermitted structure not included in presented as-built conditions

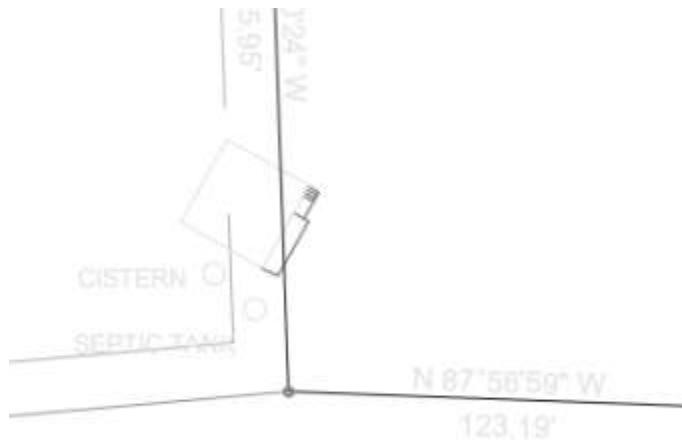


Figure 3A: Existing condition, as reported in 2013 draft survey.

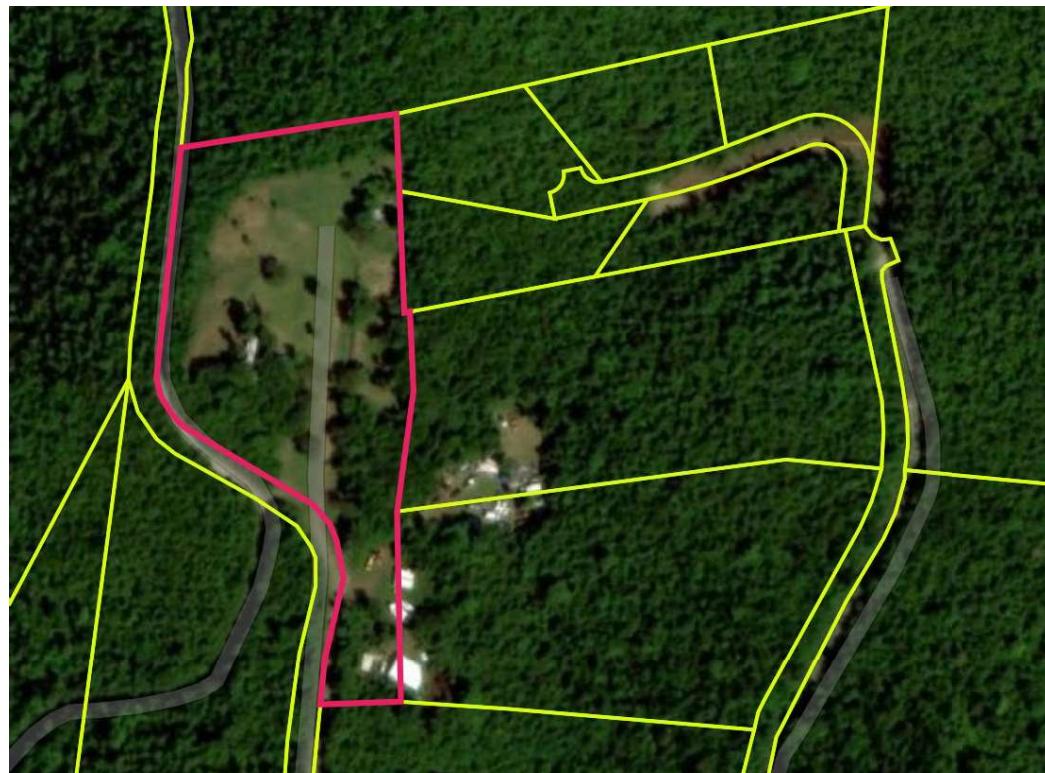


Figure 4A: Satellite photo superimposed with property lines via [REGRID](#) show structures and vehicles in cleared areas that extend onto 19 Susannaberg.

Exhibit A- Unpermitted structure not included in presented as-built conditions



Figure 5A: Occupied unpermitted wood structure at shared boundary of 19 Susannaberg (photo taken 9 December 2025).



Figures 6A: Existing wood building straddling the property line at 15 and 19 Susannaberg (March 2013)

Exhibit B- Encroachment (2013, August 2022, March 2023, June 2025)



Figures 7B: Existing water tank and septic removed. The corner of the existing building was cut off at the property, prior to my acquisition of 19 Susannaberg (photos taken April 2013).

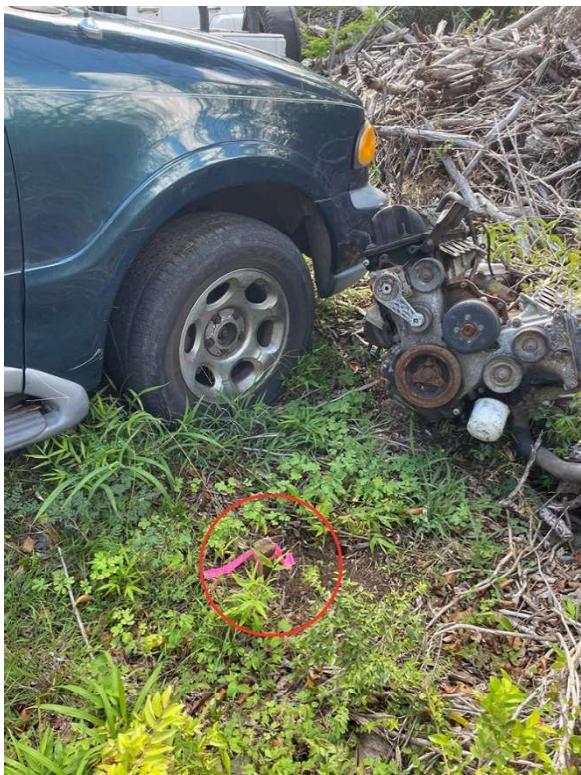
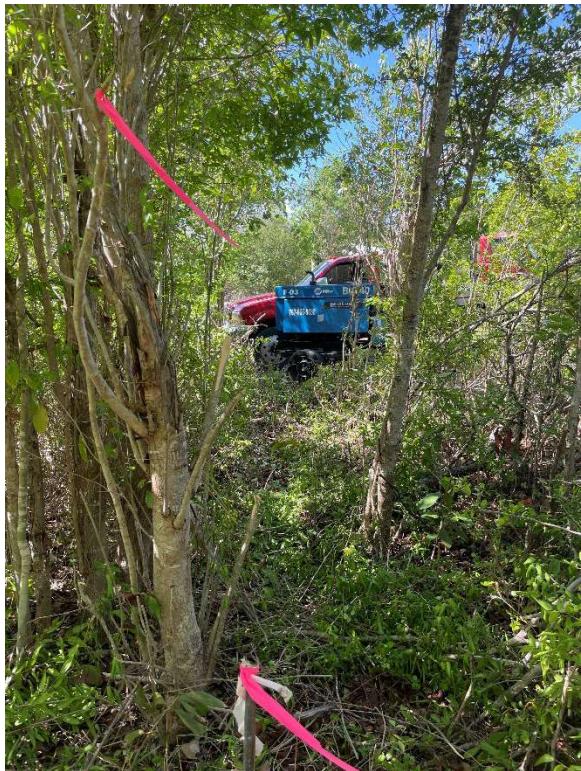
In January of 2021, I discovered additional land was cleared from 15 and 18 Susannaberg, including across the property line in a portion of the rear and side yards of 19 Susannaberg without my permission nor notification. Because this land was cleared by Mr. Jones, it appears “available,” and it has been very difficult to maintain the boundary. The purpose was to make way for an **auto-wrecking** operation, which appeared in my backyard. This industrial tenant, managed by Mr. Jones, and the occupant of the home pictured above repeatedly encroach upon 19 Susannaberg with water tanks, equipment, vehicular and boat parking and industrial storage. I have asked Mr. Jones repeatedly to request his tenant respect the property line and manage the litter and hazardous waste.

In August 2022, I paid a surveyor to re-stake the property line to clearly delineate areas of encroachment, so as to eliminate any confusion.

By March 2023, the markers were gone and the wrecks and discarded car parts multiplied. Trash and encroachment across the property line got worse, despite Mr. Jones’ efforts to mark the boundary with a string line.

In March 2025, I again had to ask Mr. Jones to require his tenant to respect the property line and remove the water tanks on my property. He also asked his tenant to relocate the wrecks from 18 Susannaberg. The amount of trash in the yard is concerning, especially because it washes into the gut at a lower elevation on my property.

Exhibit B- Encroachment (2013, August 2022, March 2023, June 2025)



Figures 8B: Auto-wrecking operation (not permitted in any residential zoning districts) at 18 Susannaberg and encroaching on 19 Susannaberg, with trash, auto-parts, and industrial equipment. Photos shared with Mr. Jones via SMS (photos taken in August 2022). Cars and automotive parts were relocated to 18 Susannaberg within a week.

Exhibit B- Encroachment (2013, August 2022, March 2023, June 2025)



Figures 9B: Encroachment from 15 Susannaberg. There should be no confusion about where the property line is located, since a portion of this structure was removed because it crossed over onto the adjacent property. Photos shared with Mr. Jones via SMS (photos taken in August 2022). Water tanks, parking and equipment were relocated to 15 Susannaberg.

Exhibit B- Encroachment (2013, August 2022, March 2023, June 2025)



Figures 10B: Encroachment from 18 Susannaberg and more industrial waste and trash. Photos shared with Mr. Jones via SMS (photos taken in March 2023). Vehicles and equipment were relocated to 18 Susannaberg.

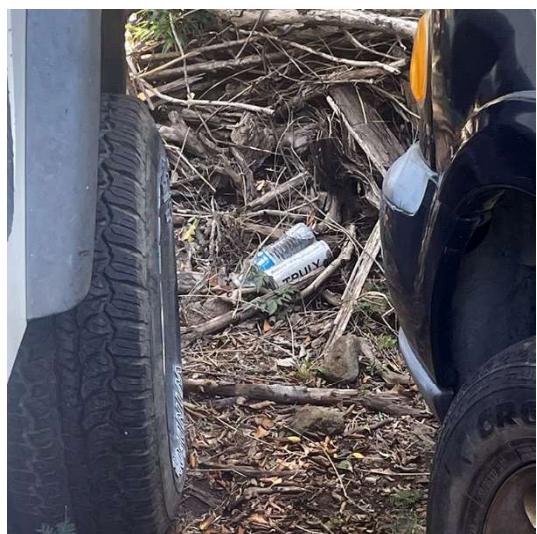


Exhibit B- Encroachment (2013, August 2022, March 2023, June 2025)



Figures 11B: Encroachment was again discussed with Mr. Jones in March 2025 and remediated in a timely manner (photos taken in March 2025).

Exhibit C- Automotive (hazardous) waste and other trash in the 19 Susannaberg gut



Figure 12C: Trash in the yard (photos taken in March 2025). Automotive and household waste were seen in the 19 Susannaberg gut.

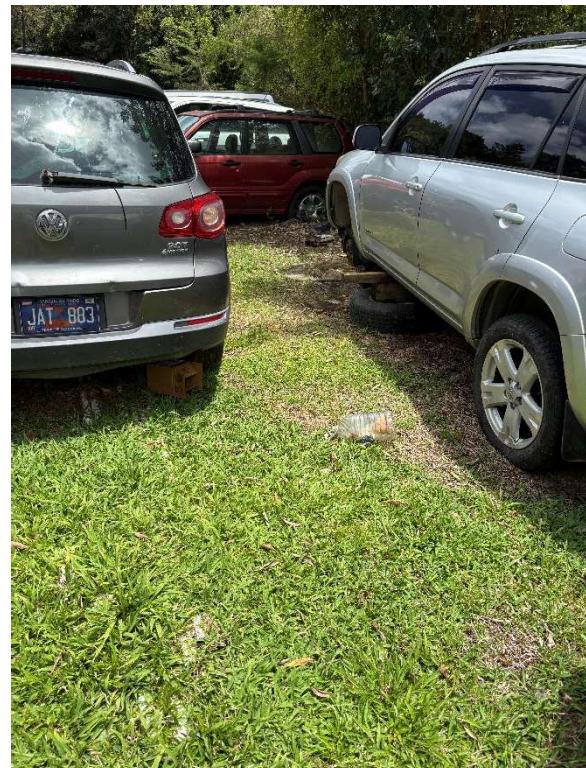
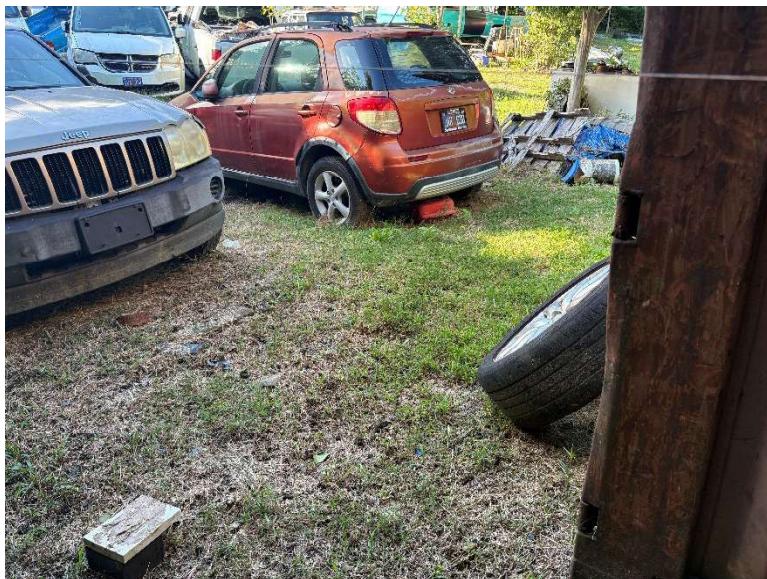


Exhibit C- Automotive (hazardous) waste and other trash in the 19 Susannaberg gut



Figures 13C: Industrial and automotive waste (lead acid batteries, automotive fluids, tires) as well as trash in the auto-wrecking yard (photos taken in December 2025).



Exhibit C- Automotive (hazardous) waste and other trash in the 19 Susannaberg gut



Figure 14B: Automotive waste (motor oil and lubricant containers, brake cleaner, seat cushion foam) and litter in the 19 Susannaberg gut (photos taken in December 2025).