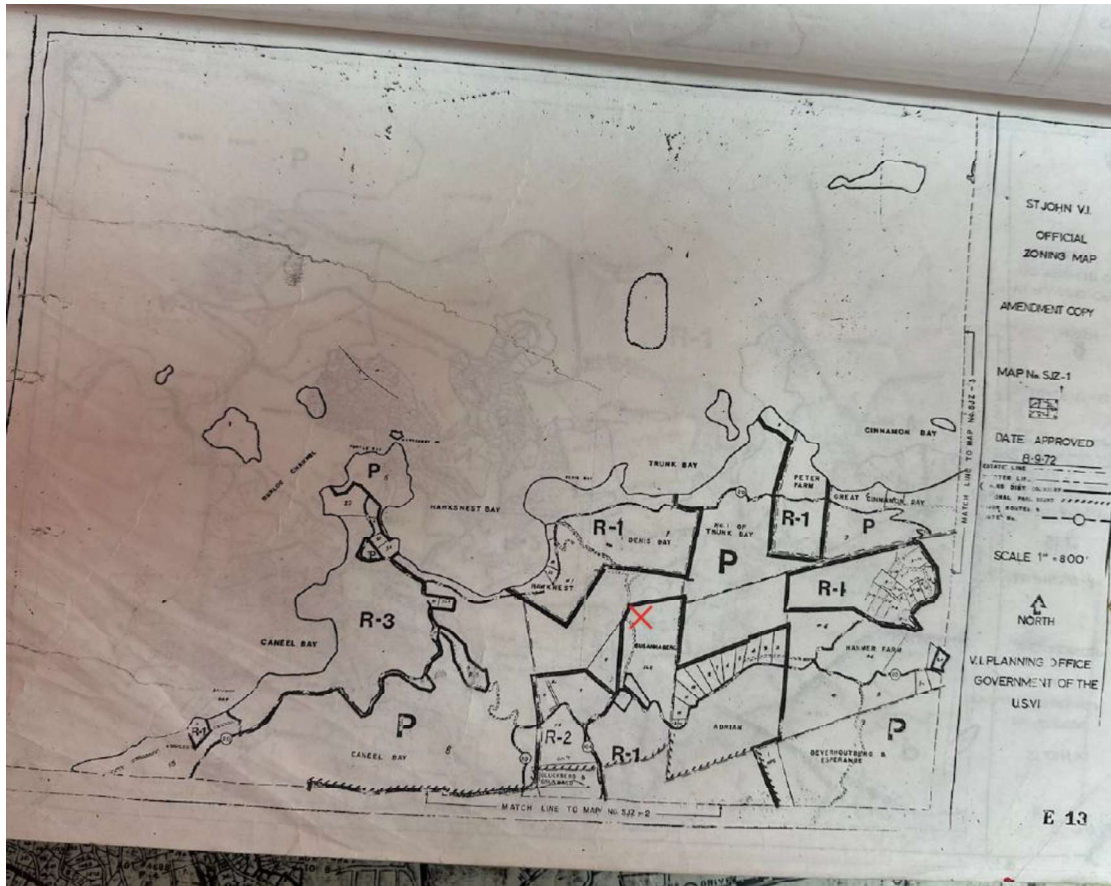


MapGeo aerial view of property (marked in red)

There have been nine rezonings in Estate Susannaberg (table with details below). Original zonings are R-1 (Residential-Low Density), R-2 (Residential-Low Density-One and Two Family) and P-Public.

Parcel No.	Year rezoned	Original Zone	Rezoned to	Act No.
3C	1997	R-2	C	6145
6 REM	2022	R-2	P	8608
6A	2024	R-2	P	8849
9	1976	R-1	B-4	3811
12	2022	P	R-3	8574
15	2009	R-1	R-4	7082
25 REM & 25B	2024	R-1	R-3	8882
28	2013	R-1	B-4 W/ USE VARIANCE	7577
29	2016	R-1	B-2	7974





*Official Zoning Map No. SJZ-1 (property's location indicated by red X)*

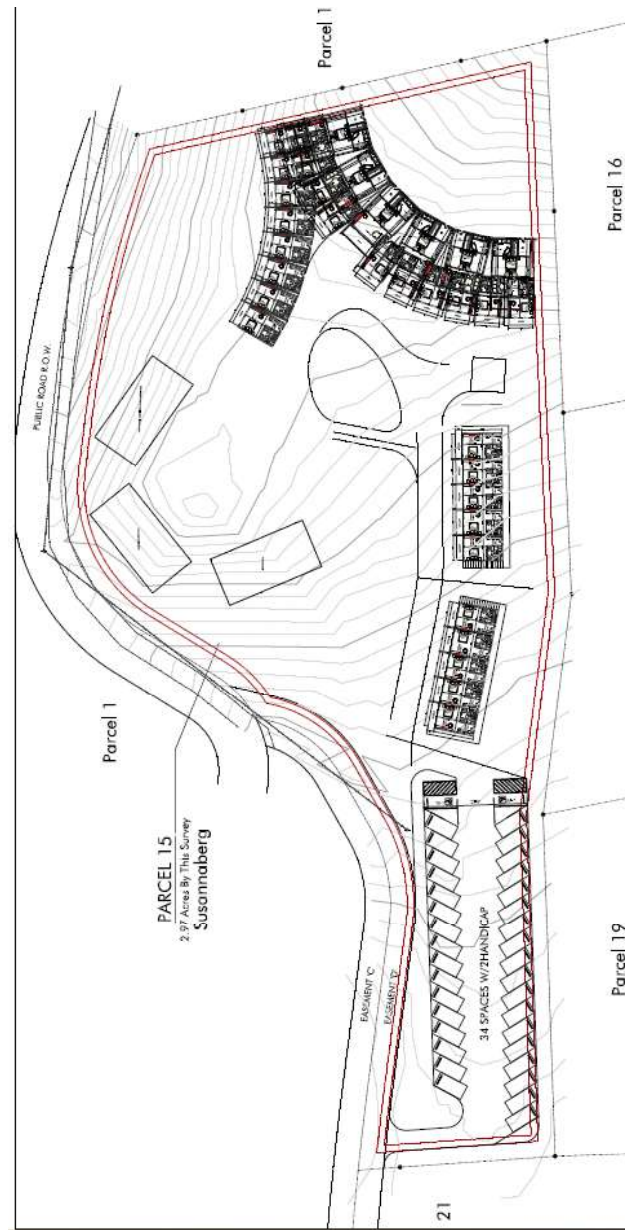
**Infrastructure:** Water needs will be provided by cisterns. Sewage will be handled by a wastewater treatment plant.

**Other needed DPNR Division reviews:** None.

**Project Summary:** At DPNR-CCZP's public hearing, Mr. Ronnie Jones testified a 2008 attempt was made to rezone the property to construct six dwelling units. The rezoning was granted for R-4 zoning by Act No. 7082. The project did not come to fruition due to the death of his business partner. The site has been used as a campground.

The current proposal is for the phased construction of a 48-room hotel/guesthouse that would be phased. The first phase would be development of the public spaces; restaurant, event space, spa, gym, pool, and 42 parking spaces. The second phase would be the first set of guest rooms. The third phase would be the final set of guest rooms and landscaping. A total of six buildings are proposed with a maximum height of three stories.

The proposal includes 12 ADA accessible guest rooms, two ADA accessible parking spaces, and possibly green roofs. Timeline for completion is to be determined.



*Conceptual site plan layout*

**Public Response at DPNR-CCZP Public Hearing held November 25, 2025:**

There were two commenters and three post-hearing emails/letters submitted for the file. Questions, comments, concerns, and opposition posed by attendees were summarized and the applicant's responses are attached as an appendix to this

report (File item 19. Applicant Response to Public Comments). They were generally of the nature of:

1. Public hearings' comments focused on clarifications of the proposal's development details and the difference between the requested R-3 zone versus the current R-4 zone.
2. Objection in part because of unauthorized widening of access road to Parcel 15, encroaching on adjacent property owners' parcels.
3. Objection: systemic issues and negative impacts on island and St. John moratorium needed on all rezonings and variances.
  - a. Broken Promises and Exploitation
    - i. Rezoning requests often promise community benefits but results in:
      1. Parcels sold to developers for profit.
      2. Unchecked development that disrupts residential areas.
    - ii. Original zoning maps were designed to prevent spot rezonings and maintain continuity, but this framework is being eroded.
  - b. Examples of Negative Outcomes
    - i. Adrian (Parcel 5C): Rezoning led to Midway Grocery evolving into a gas station, food truck, outdoor bar, restaurant, and nightclub. Resulted in noise pollution, light pollution, and traffic hazards.
    - ii. Other areas:
      1. Susannaberg: Promised organic farms but turned into bars and concert venues.
      2. Contant: Rezoned for middle-income condos but sold to luxury timeshare developers.
      3. Gifft Hill: Variance for worker housing resulted in unsafe stacked shipping container housing.
      4. Wharfside Village & Dolphin Market: Hotels built without ADA compliance, fire safety, or proper permits.
  - c. Nonconforming Uses and Lack of Enforcement
    - i. Widespread illegal or unpermitted uses on R-1 and R-2 parcels:
      1. Restaurants, bars, car repair shops, boat storage, laundromats, heavy equipment yards.
      2. Multi-apartment buildings without permits.
      3. Residences operating as hotels.

- ii. DPNR lacks control and oversight, allowing unsafe and environmentally damaging practices.
  - d. Call for Action.
    - i. Before approving any new rezonings, DPNR should:
      - 1. Address decades of uncontrolled and illegal development.
      - 2. Enforce existing codes and correct violations.
    - ii. Continuing to approve rezonings perpetuates harm to the island's resources and quality of life.
    - iii. recommend against rezoning Parcel 15 for any use beyond what is currently allowed.
- 4. Supports rezoning conditionally, requesting three key requirements:
  - a. 15-foot setback
    - i. The site plan presented on November 25, 2025, public hearing included a 15' setback, which should be formalized as a condition.
    - ii. Current zoning rules reduce setbacks for higher-density zones but given proximity to National Park lands and R-1 parcels, setbacks are critical.
    - iii. An unpermitted structure previously straddled the property line and there are ongoing encroachment issues (land clearing, tenant activities like auto-wrecking and storage beyond property boundaries).
  - b. Height limitation
    - i. Requests a maximum three-story condition, consistent with the applicant's stated design and R-3 allowances.
    - ii. The six-story maximum permitted under R-3 would be out of character for the area and negatively impact viewsheds.
    - iii. Architect made statement about terraced, low-impact design.
  - c. Stormwater and waste management
    - i. Require condition for installation of a fence and surface water berm along the zoning boundary to prevent contamination of a sensitive gut (natural drainage area) on adjacent property.
    - ii. Concerned about erosion, sedimentation, and trash from adjacent auto wrecking operations.
    - iii. Cited Virgin Islands Code (Title 29, Section 230) requiring parking areas to prevent drainage onto adjoining properties.
  - d. Additional Points

- i. Supports rezoning only if the three conditions are imposed to protect health, safety, and welfare.
- ii. Notes that the parcel should revert to R-1 if construction does not begin within 36 months after permits, per Section 238 (c) of the Zoning Code.
- iii. Mentions historical context: R-4 designation was approved in 2006 for a six-unit dwelling but was never built.

**Analysis of Request/Reason for Recommendation:** The request is for a switch between the two residential medium density zonings, due to the differences in the Table of Permitted Uses and Development Provisions of the R-3 and R-4 zones. The R-3 zone has a more permissive Table of Permitted Uses but more restrictive development provisions when compared to the R-4 zone.

Comparison of the R-3 and R-4 zones (Uses and Development Provisions)

	R-3	R-4
Table of Permitted Uses	38 Uses permitted as a matter of right. 15 Uses permitted subject to conditions. 31 Accessory uses permitted subject to conditions. Wireless Facilities subject to Rules and Regulations	23 Uses permitted as a matter of right. 12 Uses permitted subject to conditions. Wireless Facilities subject to Rules and Regulations
Residential Density (persons per acre)	80	120
Max. Lot Occupancy/Coverage	30% for all principal residential structures	50% for all principal structures
Min. Lot Width	No Requirement	40 feet
Max. Height in stories	6	3
Usable open space	35%	No requirement
Min. Lot Area	6,000 sq ft	3,000 sq ft

Neither zone has setback requirements.

The R-3 would create less environmental and site impact due to the more restrictive development provisions. The R-4 zone is most often found in the town areas where there is little green space on small lots and greater density.

The table below compares the development's potential under the R-3 and R-4 zones:

	R-3	R-4
Proposed Uses of Hotel/guesthouse, restaurant, event space, spa, gym, & pool	Permitted hotel, event space, & pool with the other uses as accessory subject to conditions	Pools permitted as a matter of right. Gym and event space permitted subject to conditions. All other uses would not be permitted.
Residential Density (48 room hotel/guest house= 72 persons per acre)	2.967 ac. X 80= 238 persons	2.967 ac. X 120= 357 persons
Max. Lot Occupancy/Coverage	30% for all principal residential structures or 38,772.756 sq ft.	50% for all principal structures or 64,621.26 sq ft.
Max. Height in stories	6 permitted but 3 proposed	3
Usable open space	35% or 45,234.882 sq ft. green space	No requirement for green space

Property satisfies the Minimum lot width and Minimum lot area requirements.

In analyzing the applicant's request, the department considered the R-3 zone would be more restrictive in all categories except for the maximum height limitation.

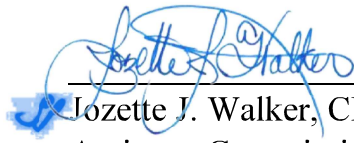
In the 2024 Comprehensive Land and Water Use Plan, A Plan for St. John section notes that some community members expressed interest in seeing the Susannaberg/Centerline Road area continue to evolve into a new mid-island mixed-use center. In Actions for St. John, it was noted for Centerline that options be explored for zoning reform that will help make it easier to provide needed services and housing in a "mixed-use, mid-island center" with improved pedestrian access. One strategy could be to tailor the zones to each island rather than a blanket Table of Permitted Uses and Development Provisions.



### **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. SJZ-1 for the island of St. John be amended by changing the zoning designation of Parcel No. 15 Estate Susannaberg, No. 17A Cruz Bay Quarter, St. John consisting of 2.967 acres as described on survey Drawing No. A9-591-T002, from R-4 (Residential-Medium Density) to R-3 (Residential-Medium Density).



Jozette J. Walker, CPM  
Assistant Commissioner

1.16.2026

Date

Cc: Jean-Pierre L. Oriol, Commissioner