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To: Virgin Islands Department of Planning and Natural Resources (DPNR)
Division of Coastal Zone Management St. Thomas, U.S. Virgin Islands via email

Subject: Public Comment Opposing Proposed Multi-Unit Rental Development Application No. CCZP0024-25: The Benoit Group/Virgin Islands Port Authority requesting a rezoning from P (Public) to R-3 (Residential-Medium Density) for Parcel No. 68A Estate Lindbergh Bay, No. 4A Southside Quarter, St. Thomas.

Dear DPNR Officials,

I am submitting this public comment as a concerned Virgin Islander with deep ties to this community. My family's property lies immediately adjacent to the proposed site for development, and we view ourselves as stewards of the land and the neighborhood.

I respectfully submit this public comment in strong opposition to the project. As discussed during the May 20, 2025 public hearing and based on publicly available information, I have serious concerns related to flood risk, planning process irregularities, public safety, lack of due diligence, and government resource allocation.

1. Flood Risk, Unsuitability for Development, and Threat to Human Life

The proposed site lies within FEMA-designated Flood Zones A and AO, as shown in the flood hazard map submitted by the developer. These are both classified as Special Flood Hazard Areas (SFHAs) which are the highest-risk zones subject to mandatory flood insurance and strict floodplain management regulations.

Zone A indicates areas with a 1% annual chance of flooding (also known as the 100-year flood zone), but where detailed base flood elevation data is not

provided. Zone AO is used for areas with sheet flow flooding shallow water across flat terrain with average flood depths of 1 to 3 feet.

According to FEMA, structures in Zones A and AO face the highest potential for both property loss and life-threatening flood conditions. These zones require specific engineering controls, including elevated construction, limited site coverage, and clearly defined evacuation pathways. None of these standards were detailed or addressed in the developer's application or conceptual plan.

Importantly, this specific area in Estate Lindberg Bay has a documented history of repeated flooding, including during non-hurricane rain events. In such topographies, floodwaters in Zone AO can sweep horizontally and trap residents, especially those without access to rapid transportation. This presents a grave danger to the future tenants, particularly low-income individuals and families who may lack the resources to evacuate swiftly during emergencies.

Placing new residential buildings in this area, especially affordable housing, creates an elevated and unacceptable risk of loss of life, not just property damage. FEMA emphasizes that SFHAs are meant to be heavily restricted development zones to mitigate exactly these types of risks.

Finally, under the Virgin Islands Coastal Zone Management Act (12 V.I.C. § 903), developments must be "suitable for the site" and must avoid causing "public health problems." This project plainly fails both tests, especially given the developer's admitted lack of awareness of the flood zone designation during the May 20, 2025 hearing.

2. Transparency, Procedural Irregularities and Lack of Due Diligence

At the May 20, 2025 public hearing, the developer admitted to being unaware that the site lies within a designated flood zone, a fundamental oversight. Even more concerning, they revealed that the site plan submitted with the developer's application (and presented during the hearing) was merely one of several internal concepts. There is a clear inconsistency between the development plans discussed during the hearing and the conceptual site plan submitted to DPNR. The conceptual drawing on record, and displayed during the hearing, depicts roughly 40 small residential structures, while Mr. Priestly, the chief development officer for the developer, stated during the hearing that the actual plan was to construct one or two multi-story buildings to accommodate approximately 126 affordable housing units.

He further explained that the firm had developed several internal concepts. This admission suggests that there is no finalized or coherent plan (an alarming sign for a project seeking approval and public funding). A project seeking public funding should be held to the highest standard of disclosure and diligence, yet this developer has demonstrated the opposite.

Additionally, the applicant acknowledged that they had not yet conducted a comprehensive environmental or archaeological study of the site. Given the island's rich cultural history and the project's potential ecological impact, (especially on a site in a flood hazard zone) this omission is unacceptable. Proceeding without such studies risks violating preservation laws and ignoring environmental consequences that must be evaluated before any permits are granted.

3. Public Safety and Neighborhood Impact

In addition to environmental risks, this proposal raises serious public safety concerns due to its proximity to the long-established Kirwan Terrace public housing community. Kirwan Terrace has long struggled with crime and violence. Placing a new affordable housing complex adjacent to it (especially without a robust, transparent community safety plan) risks exacerbating inter-community tensions and increasing local crime, placing both new and existing residents at greater risk.

Urban planning best practices caution against the overconcentration of subsidized housing in a single area, as it can lead to compounding social strain and reduced quality of life for all involved.

4. Misguided Use of Public Funds

The developer indicated during the hearing that they are seeking public funding to support this project. I strongly believe that any government resources would be far better spent addressing one of our island's most urgent housing challenges: the many hurricane-damaged homes that remain vacant because long-time residents lack the funds to complete essential repairs.

Rather than investing in new construction in high-risk zones, public funding

should support low-interest loan programs or grants to help existing homeowners rehabilitate their properties and return to safe, stable housing. This would increase housing stock without putting more families in vulnerable locations or straining local infrastructure.

5. Inadequate Infrastructure and Road Access

The only current access to Parcel No. 68A is a single-lane road that is not adequate to support the traffic volume associated with more than 100 new residential units. Additionally, the secondary access road proposed by the developer does not exist in any functional form. It is merely a right-of-way over undeveloped land. The road leading to this right-of-way is also a one-lane route that cannot be widened due to physical constraints. This infrastructure cannot safely accommodate the traffic, service vehicles, and emergency response needs of such a large-scale residential development.

6. Conclusion and Request for Denial

This proposal raises too many red flags, from the unsuitability of the flood-prone location, to the lack of transparency and due diligence, to the troubling safety and community implications. It does not align with the goals of the U.S. Virgin Islands Hazard Mitigation Plan (2023), nor with the community's long-term interests.

I respectfully urge the Department of Planning and Natural Resources and the Coastal Zone Management Committee to deny this proposal, and to instead support more strategic, equitable, and sustainable approaches to meeting the housing needs on St Thomas.

Respectfully submitted,



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