

Steven A. Smith
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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 Officials,

As someone who grew up in, went to school in and that maintains strong property ties to the area, and who represents the interests of those whose property would be affected by the proposed change in zoning, I respectfully submit the following comments in connection with the application.

- The proposal to rezone the property from P (Public) to R-3 (Residential-Medium Density) should be denied on many grounds.
- The property is where a natural gut descends and from where water causes flooding at the former Michael J. Kirwan School and at the Kirwan Terrace housing units.
- The proposed development is too large for the area.
- Proposals for the development include concepts for building many units on what is very steep land, something clearly not contemplated by the conceptual concepts submitted with the application.
- It is clear from the proposals that the developers did not study the area in any depth, nor do they have any knowledge of what building on steep land would entail. As a result, they have submitted plans incompatible with the surroundings and ones that would accelerate flooding in the area.
- The proposed number of parking spaces is more than at the nearby former school and the number of units shown in their renderings is beyond impractical and would approximate building a community four times as dense in a flood zone.
- Rather than create more environmental destruction by rezoning this area, areas such as Bourne Field should be redeveloped.
- It was clear from the hearing that the developers spent little effort in understanding the area and the community. They did not know basic information, such as the area being

situated in a flood zone (they answered that it was not), the former use of the buildings, nor did they demonstrate any knowledge building on land of that topography.

- Since the plans appear to be preliminary and poorly formed, the rezoning may be speculative in nature, essentially a no cost option for the developers to make additional money at no material cost to them.
- The potential additional access roads would severely impact the surrounding communities creating huge increases in traffic to homeowners.

Regards,

A handwritten signature in blue ink, appearing to read "Steven Smith". The signature is fluid and cursive, with the first name "Steven" and last name "Smith" clearly distinguishable.

Steven Smith

Through: leia.laplace@dpnr.vi.gov