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September 15, 2025

To:
Department of Planning and Natural Resources
Division of Comprehensive and Coastal Zone Planning
St. Croix, U.S. Virgin Islands

Re: Follow-Up to Hearing on Rezoning Request for Beeston Hill Plot 6A

Dear Members of the Department,

I am writing to follow up on the September 15, 2025 hearing regarding the proposed rezoning of Plot 6A in Beeston Hill.

The applicant and his representative, former Senator Alicia Barnes, stated that the original plan for a commercial strip mall has been abandoned and that the new proposal is a 24-unit housing development to address the island's housing shortage. While the need for housing on St. Croix is real, the requested B-2 zoning designation is inconsistent with the stated goal of residential development. R-2, R-3, or R-4 designations already exist and would allow such housing without opening the property to commercial use.

Rezoning to B-2 is not simply about one project. Once granted, the designation permanently allows over 190 different business uses. That means if the property is ever sold in the future, the next owner would have a blank check to develop commercial enterprises of their choosing—without the need for further community input. This presents both a financial windfall to the current applicant and a long-term risk of commercial encroachment into residential neighborhoods.

Equally concerning is the applicant's history. This is not the first attempt to rezone the property. After the last effort failed, there was ample time—one to two years—to conduct traffic, stormwater, environmental, and infrastructure studies to show how such a project could be responsibly integrated into the community. That work has not been done. Instead, the proposal has been repackaged without addressing the fundamental issues raised previously. Deferring these concerns to a later stage of permitting is inadequate and does not demonstrate responsible planning.

Former Senator Barnes suggested at the hearing that residents of Beeston Hill are motivated by entitlement or wealth. That characterization is inaccurate and unfair. I am a native Crucian, born and raised here to hardworking parents who sacrificed greatly so I could obtain an education and return to invest in this community. My neighbors, many of whom share similar stories, take pride in contributing to St. Croix. Our opposition is not about resisting progress or denying opportunity; it is about ensuring that development happens responsibly, in line with established zoning and planning principles.

At the hearing, only one individual spoke in favor of rezoning. Every other voice—from Beeston Hill and surrounding neighborhoods—opposed it. The overwhelming consensus of the community reflects not selfishness, but a desire for development that respects the integrity of residential areas and the Comprehensive Land and Water Use Plan.

We welcome housing that is thoughtfully designed, consistent with existing residential zoning, and responsibly planned. What we cannot support is spot zoning that creates permanent commercial entitlements under the guise of housing, ignores due diligence, and sets a precedent that could

reshape St. Croix in ways that undermine its long-term livability.

For these reasons, I respectfully urge the Department to deny the request to rezone Plot 6A.

Respectfully submitted,

David A. Doward

The image shows a handwritten signature in black ink. It consists of two parts: on the left, a stylized 'D' followed by a vertical line and a horizontal line, and on the right, a horizontal line with a vertical line intersecting it, resembling a cross or a plus sign.