

Kyle Fleming

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Leia LaPlace-Matthew
Territorial Planner
Department of Planning and Natural Resources
Division of Comprehensive and Coastal Zone Planning
45 Mars Hill, Frederiksted, VI 00840-4474

Via email: leia.laplace@dpr.vi.gov

Re: Objection to Rezoning Application CCZP0069-25 (Parcel 6a Beeston Hill)

Dear Ms. LaPlace-Matthew,

As a resident of the Beeston Hill neighborhood, I am writing in strong opposition to the application to rezone Parcel 6a Beeston Hill from **R-1 (Residential – Low Density)** to **B-2 (Business – Secondary/Neighborhood)**.

While I fully recognize the need for expanded housing opportunities in St. Croix, the request to rezone this 15.94-acre parcel to B-2 represents a **significant and inappropriate deviation from its residential intent**. The applicant has stated that their purpose is limited to constructing townhouses. However, B-2 is a commercial designation that would allow for a much broader range of non-residential uses, such as retail, offices, and other businesses, that are wholly inconsistent with the character of Beeston Hill. Once such a rezoning is granted, future owners would have the unchecked right to pursue these uses, irreversibly altering our neighborhood.

The Virgin Islands already has clear mechanisms to authorize townhouse and apartment development without resorting to commercial rezoning:

- **Residential zoning categories R-3 and R-4** are designed specifically for multi-family and higher-density housing.
- **Planned Area Development (PAD)** approvals under **29 V.I.C. § 232** allow the Legislature to authorize attached and group dwellings through a master plan process, while maintaining residential land use protections.

This approach has been used successfully and transparently. In **Bill No. 36-0095 (The Residences at 340 North)**, the Legislature approved a **PAD overlay on R-2 land** in Estate St. Joseph and Rosendahl to authorize 80 townhouse and single-family homes. This precedent demonstrates that where additional density is justified, a PAD is the **appropriate tool**, not a blanket commercial rezoning.

Further, the **2024 Comprehensive Land and Water Use Plan** explicitly calls for reforms to minimize ad hoc rezonings and protect residential character by reducing reliance on variances and spot-zoning.

Approving a B-2 designation here would undermine that policy guidance and create a dangerous precedent.

For these reasons, I respectfully urge DPNR to recommend **denial** of Application CCZP0069-25. If the applicant's genuine intent is to construct townhouses, they should pursue either a PAD overlay or rezoning to an appropriate **residential district (R-3 or R-4)**. Rezoning to B-2 is unnecessary, inconsistent with the stated project goals, and threatens the long-term integrity of our residential neighborhoods.

Thank you for your consideration of this objection and for your continued efforts to protect the land use integrity of the Virgin Islands.

Respectfully,

A handwritten signature in black ink that reads "Kyle Fleming". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Kyle Fleming
Beeston Hill Resident