



Kellerhals Ferguson Kroblin PLLC

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December 4, 2017

Via Hand Delivery & Electronic Mail

Mr. Jean-Pierre L. Oriol
Director
DPNR-Division of Coastal Zone Management
8100 Lindberg Bay, Suite 61
CEK Airport, Terminal Bldg. Second Floor
St. Thomas, VI 00802
JP.Oriol@dpnr.vi.gov

**Re: Great St. Jim, LLC
Debris Removal**

Dear Mr. Oriol:

During the course of and as a result of Hurricanes Irma and Maria, a substantial amount of debris, both organic and non-organic, debris has accumulated on the island of Great St. James. The debris includes glass, galvanized metal, boats, decaying vegetation, and other debris associated with the hurricanes (the "Debris"). The removal of the Debris and the repair and maintenance of the property was and remains critical to restoring the property to a safe and habitable condition and to protect the persons remaining in residence on the island. To the best of my knowledge, there was no enlargement or expansion of any of the areas that have been tasked for debris removal, no concrete was poured and no structures of buildings constructed. As provided for in Title 12, section 910(b), Virgin Islands Code ("VIC"), no coastal zone permit shall be required for activities related to the repair or maintenance of an object or facility located in the coastal zone, where such activities shall not result in an addition to, or enlargement or expansion of, such object or facility. ■

In addition, I have confirmed with my client that to the extent backhoes, or tracked equipment larger than a bobcat ~~is~~ are required to remove debris, we will provide your agency with photographic evidence of the debris piles and request approval to remove.

Initial debris removal did include clearance of the roads in order to enable post-hurricane supplies to be delivered to the island, including water trucks. Many of the island's employees took shelter on the island during the hurricane and were forced to remain there following the hurricanes due to the destruction of their individual homes. As a result of the unexpected and increased occupancy on the island, large amounts of supplies had to be barged in order to accommodate the immediate needs of these individuals.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

Erika Kellerhals

