



Kellerhals Ferguson Kroblin PLLC

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January 18, 2019

Via Hand & Electronic Delivery: [REDACTED]

Mr. Jean-Pierre Oriol
Commissioner
Department of Planning and Natural Resources
Division of Coastal Zone Management
Cyril E. King Airport
Terminal Building 2nd Floor
St. Thomas, VI 00802

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DPNR
VICZM PROGRAM

Re: Cease and Desist Notice dated January 14, 2019
Great St. Jim, LLC

Dear Commissioner Oriol:

We represent Great St. Jim, LLC and we are in receipt of the Cease and Desist Notice dated January 14, 2019 and have communicated with our client regarding the same.

Please be advised that Great St. Jim is currently undertaking emergency repairs to its septic system which we believe does not require a permit due to exigent circumstances. Great St. Jim is also doing some interior work including kitchen repairs, wireless internet work, electric wire repair, and repairs to water heaters and purifiers, for which no permit is required pursuant to the definition of "development" set forth in 12 V.I.C. § 902(l). Likewise, Great St. Jim's repair of boats, solar equipment, generators, and other equipment and other activities including water delivery, garbage collection, roof repairs, and painting structures on the property which we believe do not require a permit.

Accordingly, the work being done on Great St. James Island should not be construed as a violation of the Cease and Desist Notice. The activities on the island are exempt from permitting, either because of exigent circumstances or because no permit is required.

Additionally, Great St. Jim would be happy to remove the broken boat debris off of Christmas Cove although it has not done so yet. See attached photographs.

Very truly yours,

Christopher Allen Kroblin











