

\*noted attachments will be added after approval of the draft by the ARB



**Minutes**  
**Architectural Review Board**  
March 13, 2023  
Council Chambers

You may view and listen to the Architectural Review Board meeting in its entirety [here](#). The time of each presentation is in brackets below [00:00:00].

**Members Present**

Karen Irvin (Chair)  
Adriana Moss (Vice Chair)  
Helen P. Ross  
James Jarrell IV (arrived 7:25 p.m.)  
D.D. Lecky  
Kelly Penick

**Members Absent**

Laura Galke

**Staff**

Kate Schwartz  
Caroline Hieber

---

Chair Irvin called the Architectural Review Board meeting to order at 7:00 p.m.

**OPENING REMARKS**

Chair Irvin determined that a quorum of 5 members was present, and asked if public notice requirements had been met. Ms. Schwartz confirmed that they had.

**APPROVAL OF AGENDA [00:02:24]**

Ms. Penick requested to remove COA FY23-0041 at 422 William Street from the Consent Agenda and add it as item A on the regular agenda. Ms. Moss made a motion to approve the agenda as amended. Ms. Ross seconded and the motion carried 5-0.

**ANNOUNCEMENTS & REPORTS [00:04:30]**

Ms. Schwartz reminded the Board that someone may schedule a time to provide an educational presentation for the April Meeting.

**APPROVAL OF MINUTES [00:04:49]**

Ms. Moss requested confirmation that written public comments would be attached to the minutes once approved and uploaded to the website. Ms. Schwartz confirmed that they would be.

Ms. Lecky motioned to approve the December 12, 2022 minutes as written and Ms. Ross seconded. The motion carried 5-0.

**DISCLOSURE OF EX PARTE COMMUNICATIONS**

None.

**DISCLOSURE OF CONFLICTS OF INTEREST**

None.

**CONSENT AGENDA [00:07:15]**

- ~~A. COA FY23-0041 – 422 William Street – Minor Alteration~~
- B. COA FY23-0042 – 1201 Caroline Street – Minor Alteration
- C. COA FY23-0046 – 415 William Street – Sign Installation
- D. COA FY23-0048 – 1000 Charles Street – Sign Installation

Ms. Lecky motioned to approve the consent agenda as amended. Ms. Moss seconded. The motion carried 5-0.

**PUBLIC HEARING [00:19:32]**

- A. COA FY23-0041 – 422 William Street – Minor Alteration

Ms. Schwartz provided an overview of the application. Tom Rosner was present to represent the applicant. Ms. Penick asked if the lights would be colored as they appear in the renderings. Mr. Rosner clarified that the lights would not be colored, but a warm white light. Ms. Penick stated that the Board should include that in the motion.

Chair Irvin inquired about the materials of the frames and sashes and said she was concerned about a reaction between the materials. Mr. Rosner said that the steel structure and aluminum frames would both be powder-coated and used as designed by the manufacturer.

Ms. Penick motioned to approve the application with the following conditions:

1. The new lights will be a warm white in color.
2. The different metals will be separated in some manner to prevent corrosion.
3. The masonry knee walls and columns will be the same height.

Ms. Lecky seconded. There was additional discussion on the motion in regard to the present site conditions and the already constructed wall. There was additional discussion on the City Code lighting requirements.

Ms. Penick motioned to approve the application with the following conditions:

1. All lighting will have a warm white color temperature and will comply with all City requirements.
2. The aluminum and steel components of the windows and patio structure will be separated and/or coated appropriately to avoid corrosion.

Ms. Lecky seconded and the motion carried 6-0.

**Continued Applications**

- B. COA FY23-0030 – 400 Princess Anne Street – James Whitman requests approval of the site planning, scale, and massing of five new three-story townhomes to be constructed on the property behind the existing commercial building.

The representative Michael Adams, 309 George Street, was virtually present to answer questions.

Hamilton Palmer, 401 Charles Street, spoke in opposition to the application [see public comment attached].

Danae Peckler, from the Historic Fredericksburg Foundation Inc. (HFFI), spoke in opposition to the application [see public comment attached].

Mo Deadman, 214 Princess Anne Street, spoke in opposition to the application stating concerns regarding the lack of parking in the area.

Ms. Ross stated that the revisions to the application are appreciated. The townhouses have a residential scale that works well and the separation of the infill unit onto Princess Anne Street is appropriate. Ms. Ross supported the staff recommendation on site planning, scale, and massing as well as the recommendations on modifications to the details.

Ms. Lecky shared her concerns regarding the height of the structure and the mechanical penthouse. There was a discussion on the parapet height. Ms. Lecky requested exact measurements of the building, the parapet, and the mechanical access structure. Mr. Adams responded and said the flat roof provided the only outdoor space for these units and that the access was for personal use and mechanical access. He said the structure for the stair would rise four feet above the parapet. The height of the roof deck is 34 feet. Ms. Lecky also suggested that the Board should revisit the consideration of the mansard roof in later meetings. She also stated that the mixed siding and brick aligns with a suburban residential style and recommended the applicant consider alternative designs.

Ms. Penick agreed with Ms. Lecky's comments. Ms. Penick stated that detailed elevations would make it easier to fully comprehend the mass and scale of the proposed units. Ms. Penick requested additional detailed elevations showing the rooftop mechanical structures accurately. She would like to be able to see these elevations clearly in the context of neighboring structures. She asked about the possibility of adding balconies instead of roof decks. Discussion followed on the dimensions and needs for the mechanical equipment and fire access. Ms. Penick asked Ms. Schwartz if the roof details are considered a part of a scale and massing decision. Ms. Schwartz stated that the applicant was currently asking for approval of a three-story building with a flat roof. The roof details and projections would still be considered a part of the discussion of architectural details. The staff recommendation stated that the overall conceptual design is compatible with the guidelines but further consideration is needed for the details.

Mr. Adams stated that they did not design a true mansard roof. The design depicts the appearance of a mansard roof by lowering the cornice height with the intention to minimize the scale and to provide some additional ornamentation. Mr. Adams said that they need a flat roof in order to provide some outdoor space. If the Board prefers an alternative to the mansard roof, they are happy to provide that. Ms. Penick said that the HVAC structure makes the total height of the building larger than what is appropriate and was not comfortable approving the mass and scaling at this time.

Mr. Jarrell agreed with Ms. Lecky and Ms. Penick. Mr. Jarrell requested elevations of the adjacent buildings to compare to the townhome elevations and provide a reference.

Ms. Moss said she didn't understand the large stairwell enclosures. She stated that it would be more appropriate if the mechanical units were screened. The documents presented to the Board depicts a unit that appears to be four stories not three. She agreed with the alternative options presented by HFFI in its letter. There was a discussion on alternative locations for mechanical equipment and what the screening and fire safety requirements would be. Ms. Moss supported the request for additional

elevations of both the proposed townhomes and the adjacent buildings. The previous submittal included street view photos from google and those would be helpful in the future.

Chair Irvin asked if the rooftop appendages are considered under the scale and massing recommendation or if they are architectural details. Ms. Schwartz said they are considered architectural details and are characteristics open to refinement and revision during a continuing public hearing process. Mr. Adams explained that there may have been a miscommunication regarding the indoor and outdoor HVAC systems and clarified that they will both be on the roof.

The Board concluded that they were not comfortable approving the scale and massing of the application at this time as additional information and detailed drawings were needed. The Board would like to schedule another work session with the applicant.

Ms. Lecky motioned to continue the application to the next regular meeting on April 10, 2023 and to schedule a work session with the applicant. Ms. Moss seconded and the motion carried 6-0.

- C. COA FY23-0032 – 905 Princess Anne Street – Laurel Loch on behalf of St. George’s Episcopal Church requests approval of exterior alterations and additions including the construction of an accessible entry ramp and alteration to the narthex, alteration of an entrance to McGuire Hall to accommodate a new interior elevator, and an addition to McGuire Hall within the cemetery courtyard.

Rector Joe Hensley was present to answer questions in place of the architect. He stated he was hopeful that the Board will approve the application. Disturbance of the site will be performed when necessary with reverence and care to the deceased. Any discoveries will receive immediate and thorough investigation.

Casey Hu, 606 Pitt Street, spoke in support of the application stating that this has been an iconic site of Fredericksburg and in order to continue being an icon it must be accessible.

Danae Peckler, on behalf of HFFI, spoke in opposition to the application [see public comment attached].

Ms. Ross thanked the applicant for the changes to the application to reduce the disturbance and impact to gravesites and to minimize the construction footprint. She was in support of the staff recommendation.

Ms. Lecky agreed that the changes to the ramp design and scaling down of the addition have reduced the impacts. They have clearly considered alternatives and made a reasonable effort to protect and preserve the site while also achieving their goals. Ms. Lecky was prepared to approve the application.

Ms. Penick asked if a soil test had been done and noted that sandy soils in Fredericksburg can require additional structural support. Ms. Penick still has concerns with the details of the project and is not prepared to support approval at this time. She noted the significance of the site and that the alterations would impair its central form and integrity.

Mr. Jarrell agreed with Ms. Penick’s feedback and said he was concerned about the construction footprint and how they plan to bring in the materials and machinery onto the site. Mr. Jarrell requested that the applicant submit a property survey for the Board’s consideration.

Ms. Moss said she thinks the application does not fully comply with the guidelines at this time. Ms. Moss stated that they have not submitted alternative accessibility options for the board to evaluate, such as the installation of a mechanical lift. Ms. Moss said that this application does not meet the ramp accessibility guidelines in section 10 and section 11 on page 82 of the guidelines. She agreed with the HFFI comments and said that they need to minimize impact to the graveyard.

The applicant stated that the mechanical lift option was not a feasible long-term solution. The lift would make it so that they could not maintain the architectural integrity of the façade of the building.

Chair Irvin stated that the current application is compatible with the guidelines and referred to section seven of the accessibility guidelines. Chair Irvin said that it is more acceptable to modify a side entrance rather than a front entrance. Chair Irvin asked the applicant if they would like to proceed with a vote tonight or consult with the design team. They requested a continuation to address the Board's concerns.

Ms. Lecky made a motion to continue the application to the April 10, 2023 meeting. Ms. Moss seconded and the motion carried 6-0.

#### New Applications

- D. COA FY23-0043 – 1023 Caroline Street – Kevin Jones and Michael Manning request to replace the paneled wood garage door at the rear of this commercial property with a new metal garage door.

The applicants were present and said they were fine with the staff recommendation on the door style.

Ms. Ross expressed support and stated she believed the second option shown in the packet was more appropriate. Ms. Lecky agreed. Ms. Penick asked if the garage door would be prefinished or painted. Mr. Manning said that it would be prefinished standard white. Mr. Jarrell, Ms. Moss, and Chair Irvin did not have any comments and supported the staff recommendation.

Ms. Moss motioned to approve the application on the condition that the replacement door option two is used. Ms. Lecky seconded and the motion carried 6-0.

- E. COA FY23-0044 – 701 Sophia Street – Mike Ward, City of Fredericksburg Parks, Recreation, and Events, requests to install a prefabricated concrete restroom building at Riverfront Park.

Mike Ward, Assistant Director of Parks, Recreation, and Events, was present to answer questions. He said the project had received one bid. Mr. Ward said that the chase access door will need to be moved from the back of the structure to the front alongside the two restroom doors. There were no public comments.

Ms. Ross agree with staff recommendations and asked staff a clarifying question regarding the brick veneer. Ms. Schwartz said that up to two and a half feet in height, a brick veneer will be added after the fact. It will have the broom textured concrete as it is prefabricated. Mr. Ward stated that the brick veneer will be similar to the Sophia Street Parking deck.

Ms. Lecky asked Mr. Ward to elaborate on the access door relocation and the building layout. She said she would like to see exactly how the additional overhang of the roof would look. She agreed with the staff recommendation that a metal roof would be much more appropriate. Mr. Ward stated that the roof would still be concrete and the metal would be added after the fact. The City would need to hire an outside contractor to complete that standing seam metal roof. Mr. Ward said they have the option called a rib metal imprint on the prefabricated concrete roof itself. There was a discussion regarding the roof material options.

Ms. Penick asked for clarification on installing the brick veneer. There was a discussion on the brick veneer, the concrete, and the split face texture. Ms. Penick said that the combination of the concrete and brick may not be appropriate and stated that they should consider alternative material type such as stone. Mr. Ward said that they will need to install this onto a concrete pad already there. They will have to saw cut this pad during installation to allow for ADA access. The brick Veneer would help to cover the seam in the concrete. Ms. Penick stated that she was comfortable with the overall structure.

Mr. Jarrell asked a few clarifying questions regarding the access door, the electrical meter on the outside, the side frosted glass windows, and the thin veneer brick.

Ms. Moss stated that the faux metal roof is very convincing and could be appropriate. She was comfortable with the two-foot brick veneer, but stated that the top shouldn't be faux masonry. She would not support the faux pressed brick. Chair Irvin confirmed that the split face would be pressed into concrete. There was a discussion on the concrete and the finishing materials. The Board suggested that they should ensure truth in the material and not have the concrete imitate a different material.

Ms. Moss motioned to approve the application with the following conditions:

1. The brick veneer will be similar in style to the brick used for the City parking deck on Sophia Street.
2. The roof will be clad in standing seam metal. If possible, the eave overhang and/or roof pitch should be increased.
3. The wall surface above the brick will be finished with a broom texture in a color consistent with salvaged sandstone used in the park.
4. Alternate lighting fixtures that are fully shielded, downward facing, and consistent with the design details of the park will be used.

Ms. Penick seconded and the motion carried 6-0.

- F. COA FY23-0045 – 104 Wolfe Street – Huda Maltbie requests approval for alterations to convert this residence to commercial use, including the installation of mechanical equipment, signs, fencing, and a gazebo accessory structure in the rear yard.

Richard Maltbie was present to answer questions. There were no public comments.

Ms. Ross stated that the application was well documented. She had no further comments and supported the staff recommendation. Ms. Lecky thanked them for removing the unpermitted shed and said she was in support of the application. Ms. Penick asked clarifying questions with regard to the hood drawing. Mr. Jarrell, Ms. Moss, and Chair Irvin were in support of the application.

Ms. Lecky motioned to approve the application with the following conditions:

1. The fence panels used as mechanical screening must be trimmed at the bottom to accommodate the roof slope and the top of the enclosure must be level.
2. The existing plastic shed must be removed from the site.
3. The sign and bracket cannot project more than 42 inches from the building.

Ms. Moss seconded and the motion carried 6-0.

- G. COA FY23-0047 – 106 George Street – Spaces Design Studio requests to install one new fixed window on the George Street elevation at this commercial property.

Miller Blackburn was present to answer questions. There were no public comments.

Ms. Ross, Ms. Lecky, and Ms. Penick were in support of the application and the staff recommendation. Ms. Penick confirmed that the new trim would be painted wood.

Mr. Jarrell asked if the windows were from 1958. Ms. Schwartz confirmed that the window system and trim appear to be from that date. Mr. Jarrell asked if the Board would be open to allowing the new window opening to be trim-less instead of mimicking the existing window. Ms. Ross stated that she would accept that knowing that it is a secondary elevation. According to her research, the building and windows were likely designed to fit into an antiquated idea of what the historic district was at the time. Mr. Blackburn did not object to this alteration.

Ms. Moss agreed with Mr. Jarrell. She did not feel the need to require replicated trim on the new window and preferred to retain the trim on the existing window. Ms. Moss asked how they plan to remove the mural. Mr. Blackburn said they plan to paint over it.

Chair Irvin asked if there was a Historic District in 1958. Ms. Schwartz said that there was not, it was established in the late 1960's. Ms. Schwartz said that when the mural was approved in 2016, the artist came in and washed a brick off to show the Architectural Review Board that it could be removed. The application was approved with the intention that the mural would eventually be cleaned off and the brick would be restored.

Ms. Ross and Ms. Lecky requested that they gently remove the mural instead of painting over it. Chair Irvin was in support of the application. There was a clarifying discussion on the trim condition. Chair Irvin was ready to approve the application and said a window with no trim might look inconsistent.

The Board discussed alternative trim design options. Ms. Moss and Ms. Lecky suggesting a simplified trim profile of the same dimensions as the historic.

Mr. Jarrell motioned to approve the application with the following conditions:

1. The trim on the existing window will be retained.
2. The new window will include trim that is similar in dimension to the existing windows, but with a simplified profile.
3. The mural will be removed rather than painted over, using gentle cleaners or chemical removers rather than abrasive cleaners.

Ms. Moss seconded and the motion carried 6-0.

**GENERAL PUBLIC COMMENT**

None.

**OTHER BUSINESS [02:23:06]**

A. Pre-Application Discussion: Detailed Design for COA FY22-0029 – 450 Lafayette Boulevard

Paul Janney provided an overview of the elevations and details for this new residential building. Ms. Schwartz noted that the wall fixtures shown do not fit City Code will need to be fully shielded and downward facing.

Ms. Ross was pleased with this application. There is a pleasing rhythm to the façade with just the right amount of detailing. The design is handsome and will fit in well. Ms. Lecky asked for exact material details. They plan to use aluminum clad wood Andersen series. The brick will be a dark red similar to the Vakos hotel. It will be consistent across with light mortar and white trim.

Ms. Penick stated that the design is really nice and asked if the renderings were updated. He said he thought some of the architectural elements may have changed slightly and the building is slightly smaller compared to the original design. The archways are pre-cast stone. Ms. Moss appreciated the updated designs and the brickwork in the cornice of the roof.

Chair Irvin agreed with the Board. The brick surround at the windows and the doors to the balconies clashes with the simplified classical detailing of the arches and keystones. Chair Irvin suggested a course at the top of the window with a regular sill rather than picture framing around the windows. She recommended they consider alternative options such as a brick lintel or jack arch.

Ms. Moss asked if the balcony columns were round or square. The applicant confirmed they are square shaped. The design was reduced three feet in overall height because they took a foot off each floor. Ms. Schwartz asked what material will be used for the middle of the arch. Paul Janney said that could be brick or cast stone and he will have architect specify. Ms. Lecky said that it would be helpful to have drawings of both brick and cast stone to compare.

B. Amended Bylaws

Ms. Schwartz stated that the Board may now vote to adopt the updated Bylaws as they were presented at the last meeting and no one suggested any revisions. Ms. Moss motioned to adopt the amended Bylaws dated February 13, 2023. Ms. Lecky seconded and the motion carried 6-0.

**STAFF UPDATE**

Payment should be delivered to the Board soon via Direct Deposit.

**ADJOURNMENT**

Chair Irvin adjourned the meeting at 9:36 p.m.



---

Karen Irvin, Chair





13 March 2023

To: Kate S. Schwartz

[ksschwartz@fredericksburgva.gov](mailto:ksschwartz@fredericksburgva.gov)

cc: [Planning@fredericksburgva.gov](mailto:Planning@fredericksburgva.gov)

The Historic Fredericksburg Foundation has reviewed the upcoming agenda and related COA documents for the March 13, 2023 meeting of the Architectural Review Board and submits the following comments on select projects.

### **Public Hearing:**

#### **COA FY23-0030 – 400 Princess Anne Street**

This application has changed substantially since it was introduced in December and HFFI appreciates alterations that enhance the residential character of this new design, including 2/2 windows and the addition of small entry porches for each unit. The mansard roofline has been used since the 1970s to mitigate greater heights in historic areas; however, as currently proposed, the rooflines of both new buildings contrast sharply with surrounding resources. HFFI thinks staff's suggestions to further soften the roofline would help the larger unit, but finds no precedence for a stepped "double-mansard" in the district.

HFFI is disappointed to see this application—like the previous version—remains devoid of numbers to describe the vertical elements of its design. As noted in HFFI's December comments, without 2-D elevation drawings and building sections, the ARB and members of the public are left to guess about how this construction will measure up to neighboring historic resources and cannot provide constructive feedback to the applicant. Submission of "elevations" is a listed requirement for new construction COA applications along with "designs;" thus, HFFI reiterates our previous comments and big question: How can the overall size, height, and proportions of a proposed design be adequately assessed in the absence of vertical measurements?

Current renderings illustrate this conundrum with marked disparities between the floor, cornice, and eave heights of the new units and their immediate neighbors. Furthermore, without 2-D elevations or sections, the 4<sup>th</sup> floor of this building might go unnoticed, yet it exists. The awkwardly shaped vertical massings comprising the 4<sup>th</sup> stories are not in keeping with design guidelines, which require additional stories to be "**stepped back so it is not visible from adjacent streets**" (9.C.2.).

The design's 4<sup>th</sup> story goes beyond mechanical infrastructure to provide an additional outdoor room for each unit—again, a feature without precedent in the surrounding area. Such space increases the price of these units, but on a highly visible corner property, it diminishes the historic character of surrounding 19<sup>th</sup> and 20<sup>th</sup> century architectural resources. On the unit facing Princess Anne, rooftop mechanical elements could be better concealed above the southern bay or hyphen. At the larger building, floor and ceiling heights can be decreased to bring regulating lines in better keeping with those of adjacent resources, and stairs to the 4<sup>th</sup> floor could be compressed within the design to a half-story height, as seen in several late-19<sup>th</sup> and early-20<sup>th</sup> century industrial buildings in town.

## COA FY23-0032 – 905 Princess Anne Street

This application has also changed since being introduced to the ARB and HFFI greatly appreciates the applicant's efforts to further reduce the adverse impacts of the proposed design, particularly the use of a pier-type foundation to reduce the adverse impacts of the proposed ramp to the historic cemetery.

As noted in previous discussions of this application, St. George's is individually listed in the National Register of Historic Places in addition to being a contributing resource in the district. Its 36-page nomination details its historical significance, stretching from 1721 to 1959, under Criteria A for its association with important events in local social history and education; Criteria C for its unique architecture; and additional criteria considerations as a religious property and for its 18<sup>th</sup>-century cemetery—the oldest in our community. Much of this resource faces Princess Anne Street, including the L-shaped addition known as McGuire Hall erected in 1958 that contributes to the church's significance in local education along with the circa-1823 Faulkner Hall.

The NRHP nomination also states "Recent archeological investigations have determined that there are interments under Faulkner and McGuire Halls, as the cemetery is older than all of the currently extant buildings." Local historians also reference articles that note burials under the sidewalks and neighboring streets as well as internments uncovered by archaeological investigations at Market Square. We know that the estimated # of graves to be disturbed by this work is higher than anyone would like.

HFFI truly appreciates the awareness, sensitivity, and great lengths that St. George's representatives and leaders have gone to avoid negatively impacting their historic cemetery. Many are aware of the time and consideration that the church has given to purchasing neighboring buildings and rehabilitating them to meet the needs of the congregation. Undoubtedly, members of the ARB have been equally impressed by these efforts and, clearly, there is little left to be done in avoiding the negative impacts this proposal will have on the historic significance of this incredible and monumental historic asset to our community.

Yet our shared sympathy for the Church and its congregational needs does not change the fact that this project will have a lasting and irreparable harm to the City's third oldest built resource. That this work will diminish the historical integrity of this individually listed resource. It will unearth gravesites of Colonial and Revolutionary-era residents, like Col. John Dandridge and John Paul Jones' brother. It goes against a multitude of ARB guidelines.

Yet could it be avoided? HFFI believes so – if City Council and local leaders would reconsider their positions and consider selling the Wallace Library to St. George's, we might conceivably save TWO quintessential historic FXBG assets at the same time. St. George's has been an incredible steward to their church complex and cemetery, and is a partner in so many ways to our community—much like the Washington Heritage Museums. The success of the City's effort to preserve the Mary Washington Monument provides a timely precedent for open-minded solutions to our growing community—it is the kind of cooperative effort that simultaneously embrace our past and future.

**HGP, Inc.**  
**401 Charles Street**  
**Fredericksburg, VA 22401**  
**540-371-5171      373-4150 (fax)**  
**email: hpalmer@hgp.biz**

March 14, 2023

Re: 400 Princess Anne-public hearing

Chair and members of the ARB,

I am Hamilton Palmer and adjacent landowner on Frederick Street.

I want to thank Mike Adams for the great job he did on the Lofts of Fredericksburg as he set the standard for development in this area. I think he can do better with this project.

I have comments to include the following.

**Parking** - (5. Site Elements F.) *“the location of parking is considered a component of overall site planning”*. This plan shows there will be a net loss of 15 parking spaces and no parking for the apartments and coffee shop. Where is everyone going to park?

**Safety** - cars exiting the site will block the sidewalk for sight distance on Frederick Street. The building should be setback for the safety of pedestrians who use that sidewalk. There are two visually impaired persons who use that sidewalk and blocking has been a problem. You should not sacrifice safety. There is the potential the ARB approval of site planning being used as approval of site plan for a special use permits, exceptions, and variances. Site planning should be done concurrently with these other approvals.

**4th Floor** – *“new buildings should be no greater than one story taller than neighboring historic buildings”* HVAC equipment would be less obtrusive without the 'Mechanical Access floor. Sheet A109 drawing in your packet does not depict the two-story coffee shop, the 2-story brick building at 404 Princess Anne, the one-story Purina warehouse, or the one-story brick Railroad Depot building. The building height is measured in part by the number of story's and 4 story is 1 story too many.

**Townhomes** - look at the townhomes on the 300 block of Lafayette Boulevard. I think the developer can do better with something like he did at the Lofts and come up with 4 attached units that are compatible and more closely relate to the industrial character of the neighborhood (the Lofts have that industrial character look).

**Orientation** – 3 of the 4 units are facing my parking lot. By-right uses include restaurants w/indoor/outdoor seating and fast-foot, grocery, retail, repair service. Is the orientation compatible with these by-right uses

**Trees** - I am concerned about the trees I planted 23 years ago on our boundary line - see the photograph on page 9 of your packet. These trees are absent from the plans I have seen. Digging within the dripline of the tree will likely impact the trees, digging a foundation 5 feet from the trees will likely kill them. Yes, the tree roots are growing under the existing asphalt, but they are healthy and doing just fine. According to the design review for a COA, the ARB 72-23.1, *shall consider the existence of trees and other landscaping, and the extent of paving*. What is the plan for the trees?

Thank you for your consideration,  
Hamilton Palmer