

December 10, 2025

Town of Bluffton Dept of Growth Management  
20 Bridge Street  
Bluffton, SC 29910

Cover letter addressing plan review comments for COFA-09-25-019928  
Lot 50, 6 Blue Crab Road – Tabby Roads

We are writing on behalf of Patrick Mason agent of Blue Crab Bluffton LLC to address HPRC staff comments received on 10.03.2025 and HARB comments dated 12.09.2025. Please comments listed below with our responses in bold.

Growth Management Dept Review

1. Ownership/Applicant Authorization: The owner is shown as Pat Mason on the application, but Beaufort County records show Blue Crab Bluffton LLC. Update the application to show the correct property owner and provide written and signed authorization that William Court is serving as the agent/applicant.

- **The application has been updated to reflect the correct owner and Patrick Mason as the owner agent. Please see the accompanying letter authorizing William Court as the applicant**

2. Setbacks: Show the front and rear yard setback on the Composite Site Plan and the individual Site Plan.

- **All setbacks are now shown on the site plan and composite site plans**

3. Building Type: “Single Family Residential” is shown as the proposed building type, which is not a building type per the Unified Development Ordinance. Identify the building type, which must be one that is permitted in the NG-HD District (UDO Sec.5.15.5.C.). The specific building types established by district for the Old Town Bluffton are intended to “perpetuate the character that makes Bluffton distinctive” (UDO Sec. 5.15.1.C.). If an Additional Building Type is selected, identify why.

- **We have updated the application to suggest the Center Hall House building type with accompanying narrative identifying why we reference this building type**

4. Carriage House / Square Footage: As Old Town Bluffton is regulated by a form-based development code, the garage/bonus room is a carriage house and must comply with the carriage house building-type requirements of UDO Sec. 5.15.8.F. An attached carriage house “must be clearly incidental to...and distinguished from the principal building form.” Provide the individual square footage (footprint and total) for both the main structure and the carriage house. The carriage house is an ancillary structure, and it should be better differentiated from the main structure (on the eastern elevation, the wall is recessed only one foot from the main structure wall). Related to square footage, explain why the “storage room” on the second floor of the main structure is unconditioned.

- We have provided a narrative to note how the carriage house design complies with the UDO sec 5.15.8.F. We have adjusted architectural detailing and material to help distinguish the carriage house from the main house. Desired program and site limitations prevent additional distance between the house and garage. The second floor storage space is now absorbed in the conditioned space

5. Materials/Dimensions/Operations: In Section 5 of the application (Materials), for each element, provide the required materials, dimensions and operations. This information must also be shown on the architectural plans and be consistent. Some materials are not permitted per the UDO, including boral, powder-coated aluminum and composite. Your narrative, which is required with the Final Plan submission, must provide reasoning why these alternative materials are proposed and how they are the same or better in appearance and performance as permitted materials.

- Please refer to the accompanying project narratives and product cutsheets

6. Photos: Photos were not provided as required for a Concept Plan Review (COFA Application).

- Please see the accompanying site photos and surrounding context

7. On-street Parking: At the pre-application meeting, we discussed removal of the proposed on-street parking spaces. Was the plan not updated, or is it the intent to provide them? The Site Plan (P.02) and Sheet A2.1 do not match.

- We have omitted the on-street parking from the site plans as discussed

8. Screening Wall: A brick wall is shown on the east side of the house, but details are not provided. If the wall extends across property lines, an easement may be necessary that also identifies the party/parties responsible for maintenance. It appears that the wall exceeds the permitted height in the front yard; per UDO Sec. 5.15.6.K., wall height cannot exceed 42 inches and posts can be taller. Is the wall intended to serve as screen for the service yard? Consider moving the service yard farther into the property or in the rear.

- Yes, the brick wall adjacent the service yard is meant to screen the services. We have provided details in relation to the brick wall style and heights. The brick wall locations have been clarified on the site plan to show clearly where the wall and columns lie in relation to the property lines. Please see sheet A3.2 diagraming the brick wall heights and design

9. Foundation Height: The main structure foundation is 2'-0". UDO Sec. 5.15.5.F.1.c. requires residential structure to have a "first finished floor height raised a minimum of three (3) feet above average adjacent sidewalk grade."

- The foundation height has been adjusted accordingly to raise the finish floor 3ft above the average sidewalk grade

10. Roofline: The left elevation shows a variety of rooflines that appears inconsistent with UDO Sec. 5.15.5.F., which states that "[r]ooflines shall be simple [and] correspond to the major massing of the building; [and]...complicated rooflines are to be avoided.

- We have straightened the main house roof ridge in effort to "clean up" the roof line. However, we are consistently suggesting gable roof on primary massing and shed roof on dormers and porches.

11. Double Porch Detail: Show the interior elevations of the porch that are not visible.
  - Please see accompanying building sections on sheet A4.0 and A4.1 showing interior areas of the porches
12. Windows: Fixed windows are not permitted as shown on the left ground floor elevation. Per UDO Sec. 5.15.5.l.3.b. Consider changing this window to match the adjacent kitchen windows.
  - We have changed the referenced windows to casements
13. Gutters: Gutters are indicated on the application but not shown.
  - We have included a half-round gutter detail and suggested locations on the roof plan
14. Second Concept Plan Review: Given the number of comments, a second Concept Plan review will be required.
  - We were able to address many of these design comments and submit back to the HPRC staff for cursory review. We were approved to move forward with final HPC submittal. Please refer to response email dated 10.23.2025
15. Final Submission: At the time of Final Plan submission, provide a landscape plan showing foundation plantings and 75% tree canopy coverage at maturity (UDO Sec. 5.3.) and architectural details of the railings and balusters, door and window schedules, corner board/pilaster trim detail and sections through the eave and wall depicting the material and dimensions (Applications Manual). A response to all Concept Plan comments must be provided.
  - We are providing landscape plans and tree canopy coverage for this lot and adjacent related lots. Please refer to our A5 sheets for architectural details

#### HPRC Review

1. This is the same model home four times in a row with very slight roof form differences and a nominal difference in siding application. The chimney is in two different locations, but it is prominently in the same location twice. All have the exact same porch including the front door – window – bedroom door arrangement. Each home should take on a more unique character to provide variety on the streetscape. Use the porch detailing to further separate these homes. Vary column spacing, column design, handrails, door design, fenestration, etc. to create variety along the streetscape. Per UDO Sec. 5.15.5.3.a.: “Buildings shall incorporate interruptions and variety into the wall plane to create interest and variety in the streetscape while still maintaining a consistent architectural style and connection to its surroundings. Examples include but are not limited to offsets, recessed entrances, arcades, awnings and canopies, bay windows, roof overhangs, expression lines, shadow lines, porches and balconies.”

- We have taken these comments into consideration with current drawings reflecting more variation in design related to porch column layout while following UDO sec 5.15.3.a proportions. We have varied, shutter placements,

bracket details, railing details, chimney caps, and trim conditions. Please refer to the cover letter dated 12/05 for how we addressed HARB comments related to design

2. Modify the front porch column spacing to comply with UDO 5.15.6.H.1.a: "Columns and porch posts shall be spaced no farther apart than they are tall as measured from the centerlines of the columns ("o.c")."

- **Columns have been modified to ensure that they are no farther apart than they are tall**

3. The dormers on the front elevation lack sufficient scale. They are too widespread, which creates an uncomfortable, unfinished appearance. Restudy the spacing of these dormers in conjunction with the columns. Consider three dormers with a tighter relationship or a single larger dormer. Vary the design from 2 Blue Crab.

- **We have re-studied these dormers to be three dormer and varied from the 2 Blue Crab home**

4. The window in the dormer on the left carriage house elevation appears to go into the roof.

- **This error has been clarified and corrected please see sheet A3.1**

3. Review the window muntin designs for consistency. There is a mix of 4-lite and 6-lite windows that do not relate well to each other.

- **We are maintaining a consistent window and door lite pattern on this home**

4. Change the lower roof of the garage to a shed roof to match the roof over the main door.

- **This roof has been changed to match**

5. Per UDO 5.15.8.F.: "An attached [carriage house] structure must be clearly incidental to, smaller than, and distinguished from the principal building form." The garage element is not distinguished from the principal building form. Redesign the carriage house to provide definition between these two forms that is more than just "glueing" the garage onto the rear of the house. The relationship between the carriage house and porch appears haphazard and more consideration is necessary regarding how these two forms interact.

- **Due to site limitations and program requirements, we are utilizing varied architectural elements and materiality to better distinguish the carriage house from the main house. Also since adjusting the main house FFE to be 3ft above grade, the carriage house is overall 1ft lower than the main house**

#### HARB final comments

• Per UDO, Shutters must be made from "sturdy wood". Composite shutters are not permitted. Until an alternative shutter design is submitted and approved this condition shall remain in place.

**We are requesting approval from the HPC for composite shutters from the Atlantic shutter company. Should This request be denied, a sturdy wood shutter will be specified.**

• If gutters are installed, downspouts should terminate at French drains.

**Please see Landscape sheet L3 indicating locations where downspouts terminate into French drains**

- On the base of the garage, water table trim matching the main house is required.  
**We have updated the garage water table detail to suggest a 5/4x6 versus 5/4x4 trim band to match the main house. See sheet A5.1**

Sincerely,



William Court  
Founding Principal  
Court Atkins Group, Inc.