



**MEMORANDUM DATE:** September 8, 2021

**AGENDA DATE:** September 15, 2021

**TO:** Chair and Members of the Historic Resources Preservation Board

**RE:** **226 South L Street**

**FROM:** Jordan Hodges, Senior Preservation Coordinator  
Abraham Fogel, Preservation Planner  
Department for Community Sustainability

**TITLE: HRPB Project Number(s) 21-00100213 and 21-01600001:** A Certificate of Appropriateness (COA) for the construction of a new ± 840 square foot accessory structure and a historic waiver to exceed the accessory structure limitation for the property located at 226 South L Street; PCN #38-43-44-21-15-091-0040. The subject property is located within the Low-Density Multi-Family Residential (MF-20) zoning district and is a contributing resource to the Southeast Lucerne Local Historic District.

**OWNER:** Anne Fairfax Ellett  
Fairfax, Sammons & Partners, LLC  
214 Brazilian Ave  
Palm Beach, FL 33480

**PROPERTY DEVELOPMENT HISTORY:**

The single-family structure at 226 South L Street was constructed c.1925 in a Frame Vernacular style. The subject property is a simple expression of the style with few decorative architectural elements. Original features that define the style of the building include the rectangular floor plan, gable roof, overhanging eaves with exposed rafter tails, and shiplap siding. Features that have been altered overtime include the window types, sizes, and locations, and the roofing materials. The property file documentation is included as **Attachment A**.

The building sat largely vacant for many years, with rehabilitation proposals reviewed by the HRPB in 2006 and 2013. The majority of planned improvements did not materialize, aside from the partial demolition of a rear addition. In May 2016, the current property owner received approval for a new two-story +/- 1,238 square foot addition, a new one-story +/- 252 square foot detached single car garage, exterior alterations, a historic waiver to allow the front stoop to encroach into the front setback, and a pre-construction approval for a historic preservation ad valorem tax exemption. Additionally, the application included a request for a variance from the building lot coverage requirements, which was not approved.

In January of 2017, a revision to the scope of work was approved for the tax exemption application that greatly reduced the size of the addition and eliminated the construction of the garage. The revised

application proposed replacing the structure’s windows, doors, roof, and siding and included the construction of a +/- 205 square foot laundry, storage, and pergola addition on an elevated rear deck. The property also received a full interior renovation, including upgrades to all mechanical and plumbing systems. The revision application was approved, and the historic preservation tax exemption was revised to reflect the new scope of work.

At the July 14, 2021 HRPB meeting, the Board reviewed conceptual plans for a detached two-story accessory structure. The accessory structure, as proposed, will require a historic waiver to exceed the accessory structure square footage limitation provided in the zoning code. The Board recommended that the project return as a formal item and indicated the historic waiver could be useful in discouraging two-story additions to small historic structures by allowing larger accessory structures. The property owner’s Justification Statement provided during the conceptual review is provided as **Attachment B**. Current photos of the property are included as **Attachment C**.

### **PROJECT DESCRIPTION**

The property owner, Anne Fairfax Ellett, is requesting approval for the construction of a new ± 840 square foot accessory structure and a historic waiver to exceed the accessory structure limitation. The subject property is a 25’x135’ (3,375 square foot) platted lot of record located on the east side of South L Street between 2<sup>nd</sup> Avenue South and 3<sup>rd</sup> Avenue South, in Lake Worth Beach. The subject property is located within the Low-Density Multi-Family Residential (MF-20) zoning district and retains a Future Land Use (FLU) designation of Medium Density Residential (MDR).

The application will require the following approvals:

1. **Certificate of Appropriateness (COA)** for the construction of a new accessory structure
2. **Historic Waiver (HW)** to exceed the accessory structure limitation provision

### **STAFF RECOMMENDATION**

Staff recommends approval with conditions for a COA to construct the new accessory structure as the proposed building is sited in an appropriate location and designed in a historically compatible manner that utilizes appropriate materials that are in compliance with the City’s Historic Preservation Design Guidelines. Staff recommends that the HRPB review the Historic Waiver criteria to determine if the accessory structure area limitation provision may be waived.

### **PROPERTY DESCRIPTION**

Owner	Anne Fairfax Ellett
General Location	East side of South L Street between 2 <sup>nd</sup> Avenue South and 3 <sup>rd</sup> Avenue South
PCN	38-43-44-21-15-091-0040
Zoning	Low-Density Multi-Family Residential (MF-20)
Existing Land Use	Single Family Residence
Future Land Use Designation	Medium Density Residential (MDR)



### **SITE ANALYSIS:**

#### **Surrounding Properties**

The site is surrounded by similar residential structures with similar Zoning and FLU designations, and thus, are found to be compatible with the existing and proposed residential use on the subject site. The following summarizes the nature of the surrounding properties adjacent to the subject site:

**NORTH:** Immediately north of the subject site is a single-family structure. This parcel contains a FLU designation of MDR and a zoning designation of MF-20.

**SOUTH:** Immediately south of the subject site is a surface parking lot. This parcel contains a FLU designation of MDR and a zoning designation of MF-20.

**EAST:** East of the subject site across the rear alley is a single-family structure. This parcel contains a FLU designation of MDR and a zoning designation of MF-20.

**WEST:** West of the subject site across South L Street is a single-family structure and a detached accessory dwelling unit. This parcel contains a FLU designation of MDR and a zoning designation of MF-20.



**LAND DEVELOPMENT CODE REQUIREMENTS:**

Land Development Code Requirements		
Code References	23.3-10 (MF-20); 23.4-10 (Off-street parking)	
	Required	Existing/Proposed
Lot Area	5,000 sf.	<b>3,375 sf. (Platted Lot of Record)</b>
Lot Width	50'-0"	<b>25'-0" (Platted Lot of Record)</b>
Building Height	24'-0" (2 stories – accessory structure)	23'-0" (2 stories)
Setback - Side	North: 5'-0" (Min. 5' for 2-story buildings) South: 5'-0" (Min. 5' for 2-story buildings)	North: 5'-0" South: 5'-0"
Setback - Rear	5'-0" (5' for accessory structures)	10'-0"
Impermeable Surface Total <sup>(1)</sup>	65.0% total (2,183.75 sf.)	41.98% (1,417 sf.)
Front Yard Impermeable Surface Total	900 sf. or 75% pervious and landscaped	87%.00 (261 sf.)
Maximum Building Coverage <sup>(1)</sup>	45.0% maximum (1,518.75 sf.)	30.74% (1,037.5 sq. ft.)
Floor Area Ratio <sup>(1)</sup>	0.60 maximum (2,025 sf.)	0.30 (1,037.5 sq. ft.)



Accessory Structure Limitation	247 sf. (40% of the principal structure area or 1,000 sf., whichever is less)	<b>840 sf. (136.03% of the principal structure)</b>
Parking	Single-family detached on lot less than 50 ft. wide: 1 space per unit	1 space
Parking Dimensions	9'x28' perpendicular or angled off alley	9'x28' perpendicular off alley

(1)- Small lot (lots up to 4,999 square feet)

The proposed architectural plans are provided as **Attachment D**. The application, as proposed, meets the minimum off-street parking requirements and complies with all impermeable surface requirements, building coverage allotments, and required building setbacks with the exception of the accessory structure limitation provision. As outlined in the site data table, the proposed accessory structure is 136% of the principal structure area which is in conflict with LDR Section 23.3-10. The applicant has requested relief from this code limitation with the use of a historic waiver. The historic waiver request is evaluated in the Historic Waiver Analysis on pages 11-12.

The applicant's calculations do not distinguish between the buildings (principal and accessory) and structures (rear raised deck). Staff has included a condition of approval that the site data calculations be revised for permitting to ensure compliance with the development standards. Any proposed site improvements such as pavers and gravel shall be included in these coverage calculations.

**Existing Non-Conformities**

The existing property is a nonconforming lot of record that does not comply with the minimum lot area and lot width provided within Section 23.3-10 of the Lake Worth Beach Land Development Regulations. Pursuant to LDR Section 23.5-3(c), Nonconforming lots of record:

*A nonconforming lot of record is a platted lot which by width, depth, area, dimension or location does not meet current standards set forth in these LDRs. In any zoning district in which single-family dwelling units are permitted, notwithstanding limitations imposed by other provisions of these LDRs, a single-family dwelling unit and customary accessory buildings may be erected on any single nonconforming lot of record so platted on or before January 5, 1976.*

The subject property was platted prior to January 5, 1976. Therefore, single-family development and customary accessory buildings may be erected.

**Accessory Structure**

Although the property is zoned multi-family, the parcel does not meet the minimum lot width or area provisions required to accommodate more than a single-family structure and an accessory structure. Accessory structures are customarily incidental and subordinate to the principal building or use. Examples of accessory structures include but are not limited to detached garages, tool sheds, pool cabanas, and

guesthouses. The proposed accessory structure features a garage on the ground floor and habitable living space on the second floor, consisting of a bedroom, dressing room, bathroom, and wet bar. As the parcel does not meet the minimum lot provisions necessary to accommodate a multifamily use, the living space will not be permitted to function independently from the existing single-family residence. The accessory structure will not be eligible for a Lake Worth Beach rental license and will not be permitted to have separate utility connections. Staff has included conditions of approval regarding the use restrictions for the proposed accessory structure.

## **HISTORIC PRESERVATION ANALYSIS**

### **Certificate of Appropriateness**

All new construction within a designated historic district shall be visually compatible. New buildings should take their design cues from the surrounding existing structures, using traditional or contemporary design standards and elements that relate to existing structures that surround them and within the historic district as a whole. Building design styles, whether contemporary or traditional, should be visually compatible with the existing structures in the district.

The massing and placement of the accessory structure is similar to many surviving examples of rear two-story garage-apartments from the City's early development history found throughout the historic districts. The building is designed with a flared Dutch gable roof, a projecting second story balcony, an exterior staircase, decorative divided light windows, and a combination of stucco and wood lap siding. The Land Development Regulations (LDRs) provide general guidelines for granting COAs and specific visual compatibility guidelines for new construction within historic districts. The guidelines and staff's analysis to the criteria are provided below. The property owner has submitted responses to the guidelines, included in this report as **Attachment E**.

#### Section 23.5-4(K)(1) *General guidelines for granting certificates of appropriateness;*

1. *In general.* In approving or denying applications for certificates of appropriateness, the city shall, at a minimum, consider the following general guidelines:

- A. What is the effect of the proposed work on the landmark or the property upon which such work is to be done?

**Staff Analysis:** The proposed accessory structure will have no direct impact on the existing contributing resource, but will have an indirect visual effect. The application proposed to construct a new two-story accessory building with garage space on the ground floor and habitable living space on the second floor.

- B. What is the relationship between such work and other structures on the landmark site or other property in the historic district?

**Staff Analysis:** The proposed work will have a minor visual effect on the surrounding district. It is staff's analysis that the proposal will not adversely impact neighboring structures within the district as the structure's architectural style, massing, and placement are largely compatible and unobtrusive.

- C. To what extent will the historic, architectural, or archaeological significance, architectural style, design, arrangement, texture, materials and color of the landmark or the property be affected?

**Staff Analysis:** The physical arrangement of the parcel will be altered with the construction of a new accessory building, but the contributing resource at the front of the lot will not be altered.

- D. Would denial of a certificate of appropriateness deprive the property owner of reasonable beneficial use of his property?

**Staff Analysis:** The applicants contend that the additional space the accessory structure will provide is necessary for reasonable use of the property as the existing historic resource is very small and inadequate for today's living expectations.

- E. Are the applicant's plans technically feasible and capable of being carried out within a reasonable time?

**Staff Analysis:** The plans are feasible and could be carried out in a reasonable timeframe.

- F. Are the plans (i) consistent with the city's design guidelines, once adopted, or (ii) in the event the design guidelines are not adopted or do not address the relevant issue, consistent as reasonably possible with the applicable portions of the United States Secretary of the Interior's Standards for Rehabilitation then in effect?

**Staff Analysis:** The proposal is largely compatible with the Lake Worth Beach Historic Preservation Design Guidelines section on Frame Vernacular architecture and the considerations provided for new construction.

- G. What are the effects of the requested change on those elements or features of the structure which served as the basis for its designation and will the requested changes cause the least possible adverse effect on those elements or features?

**Staff Analysis:** The existing historic resource on the property will not be directly affected by the construction of the proposed accessory structure.

*Section 23.5-4(K)(3) Additional guidelines for new construction and for additions (as applicable); visual compatibility.*

- A. In approving or denying applications for certificates of appropriateness for new construction, the City shall also, at a minimum, consider the following additional guidelines which help to define visual compatibility in the applicable property's historic district:

- (1) The height of proposed buildings shall be visually compatible and in harmony with the height of existing buildings located within the historic district.

**Staff Analysis:** The proposed building is consistent with the height of other two-story buildings in the neighborhood and is in harmony and visually compatible with other historic properties in the district.

- (2) The relationship of the width of the building to the height of the front elevation shall be visually compatible and in harmony with the width and height of the front elevation of existing buildings located within the district.

**Staff Analysis:** Although the building is set to the rear of the parcel behind the existing cottage, the width and height of the front elevation, as visible from South L Street, is in scale with surrounding properties.

- (3) For landmarks and contributing buildings and structures, the openings of any building within a historic district should be visually compatible and in harmony with the openings in buildings of a similar architectural style located within the historic district. The relationship of the width of the windows and doors to the height of the windows and doors in a building shall be visually compatible with buildings within the district.

**Staff Analysis:** The proposed fenestration is in harmony with visually related buildings of similar architectural styles. The proportion and placement of the windows and doors is visually compatible with the proposed architectural style of the building and with the existing historic resource on the parcel.

- (4) The relationship of solids to voids in the front facade of a building or structure shall be visually compatible and in harmony with the front facades of historic buildings or structures located within the historic district. A long, unbroken facade in a setting of existing narrow structures can be divided into smaller bays which will complement the visual setting and the streetscape.

**Staff Analysis:** Each façade features a rhythm of solids to voids with window and door openings that avoid long, unbroken walls. The design utilizes an overhead garage door on the east façade and outswing carriage doors on the west façade to further enhance its use and overall design.

- (5) The relationship of a building to open space between it and adjoining buildings shall be visually compatible and in harmony with the relationship between buildings elsewhere within the district.



**Staff Analysis:** The proposed building complies with all setback requirements within the zoning code and is spaced appropriately with surrounding properties.

- (6) The relationship of entrance and porch projections to sidewalks of a building shall be visually compatible and in harmony with the prevalent architectural styles of entrances and porch projections on buildings and structures within the district.

**Staff Analysis:** The accessory structure is proposed to the rear of the property and does not directly address South L Street. However, the rear façade adequately addresses the alley with a garage bay, a masonry site wall and a pedestrian gate, which is appropriate for rear facades.

- (7) The relationship of the materials, texture and color of the façade of a building shall be visually compatible and in harmony with the predominant materials used in the buildings and structures of a similar style located within the Southeast Lucerne Local Historic District.

**Staff Analysis:** The building is proposed to utilize stucco siding on the ground floor and wood lap siding on the second floor. Dimensional asphalt shingle is proposed for the roofing material. Overall, the materials are in harmony with the predominate materials used on the existing residence and with visually related structures within the Southeast Lucerne Local Historic District.

- (8) The roof shape of a building or structure shall be visually compatible and in harmony with the roof shape of buildings or structures of a similar architectural style located within the Southeast Lucerne Local Historic District.

**Staff Analysis:** The building is designed with a flared Dutch gable roof, which is a more elaborate roof system than typically seen on secondary accessory structures. Although the design is somewhat atypical, the roof system is compatible and complimentary with the overall design of the building.

- (9) Appurtenances of a building, such as walls, wrought iron, fences, evergreen, landscape masses and building facades, shall, if necessary, form cohesive walls of enclosures along a street to insure visual compatibility of the building to the buildings and places to which it is visually related.

**Staff Analysis:** The design utilizes a masonry site wall and gates to form a compatible and cohesive enclosure along the alley.

- (10) The size and mass of a building in relation to open spaces, the windows, door openings, porches and balconies shall be visually compatible and in harmony with the buildings and places to which it is visually related.

**Staff Analysis:** The size, massing, and other visual qualities of the proposed accessory structure are compatible and in harmony with visually related properties.

- (11) A building shall be visually compatible and in harmony with the buildings and places to which it is visually related in its directional character: vertical, horizontal or non-directional.

**Staff Analysis:** The applicant has provided renderings showing the building in relation to the existing residence, and a streetscape elevation depicting the building's visible portions as viewed from South L Street. The building's height and massing are compatible with the existing residence and other residential structures on the block.

- (12) In considering applications for certificates of appropriateness to install mechanical systems which affect the exterior of a building or structure visible from a public right-of-way, the following criteria shall be considered:

- (a) Retain and repair, where possible, historic mechanical systems in their original location, where possible.

**Staff Analysis:** Not applicable, the application proposes new construction.

- (b) New mechanical systems shall be placed on secondary facades only and shall not be placed on, nor be visible from, primary facades.

**Staff Analysis:** The mechanical system placement will be reviewed at permitting to ensure this requirement is satisfied.

- (c) New mechanical systems shall not damage, destroy or compromise the physical integrity of the structure and shall be installed so as to cause the least damage, invasion or visual obstruction to the structure's building materials, or to its significant historic, cultural or architectural features.

**Staff Analysis:** The mechanical system placement will be reviewed at permitting to ensure this requirement is satisfied.

- (13) The site should take into account the compatibility of landscaping, parking facilities, utility and service areas, walkways and appurtenances. These should be designated with the overall environment in mind and should be in keeping visually with related buildings and structures.

**Staff Analysis:** The proposal successfully incorporates sheltered parking, adequate vehicle backout, walkways, and site walls to create a visually compatible environment.

B. In considering certificates of appropriateness for new buildings or structures, which will have more than one primary facade, such as those on corner lots facing more than one street, the HRPB shall apply the visual compatibility standards to each primary facade.

**Staff Analysis:** The structure is sited on the rear of the parcel, but portions will remain visible from South L Street which have been reviewed for compliance with the visual compatibility standards.

### **Historic Preservation Design Guidelines Analysis**

The Lake Worth Beach Historic Preservation Design Guidelines identify 10 primary historic architectural styles that make up the majority of the City's historic resources. Chapter 5; Architectural Styles, illustrates and describes the elements that define each style. In addition to defining the physical characteristics of each primary style, a narrative is provided that chronicles the history and context of each style. The Frame Vernacular architectural style section is included as **Attachment F**.

**Staff Analysis:** The proposed accessory structure is largely compatible with the elements of Frame Vernacular architecture as outlined in the Design Guidelines. The design utilizes a two-story regular box form topped with a flared Dutch gable roof with broad overhanging eaves. The base of the building is clad in stucco and the second floor, which hosts the living quarters, is clad in a wood lap siding. The building features regularized and balanced fenestration, utilizing divided light hung windows and French doors. The rear of the building, fronting the alley, incorporates six-foot-high site walls to form a cohesive enclosure.

### **Historic Waiver Analysis**

Pursuant to LDR Section 23.3-10(c)(8) *Accessory Structures*:

*"All accessory structures shall not exceed 40% of the gross floor area of the principal structure or one thousand (1,000) square feet whichever is less, excluding approved prefabricated metal storage buildings totaling no more than one hundred forty-four (144) square feet."*

The existing single-family structure's gross area is 617.5 square feet, therefore the maximum allowed square footage of an accessory structure at the property is 247 square feet. The current request is for an accessory structure totaling 840 square feet, which is 136% of the gross area of the existing single-family structure.

Pursuant to LDR Sec. 23.5-4(r)(2) *Incentives for improvements to designated landmark and contributing properties*:

*"Waiver or modification of certain land development regulations. In addition, the HRPB may waive or modify certain land development regulation requirements. Waiver or modification may occur concurrently with issuance of a certificate of appropriateness or upon initial designation of a landmark or of a historic*

*district. Waivers may include setbacks, lot width, area requirements, height limitations, open space requirements, vehicular parking and circulation requirements, design compatibility requirements and similar development regulations. No waiver shall be permitted for permitted land uses, density or environmental and health standards.”*

Pursuant to City of Lake Worth Beach LDR Sec. 23.5-4(r)(2), the HRPB may grant historic waivers if the request meets the criterion listed in the section below. Due to the building’s contributing designation within the Southeast Lucerne Local Historic District, the application is eligible for relief from certain land development requirements provided in Sec. 23.3-10, should the Board determine that the criterion is sufficiently met. The applicant has provided a Justification Statement for the request, included in this report as **Attachment G**.

In accordance with City of Lake Worth Beach LDR Sec. 23.5-4(r)(2), before granting a waiver or modification, the HRPB must find that:

- (A) The waiver or modification is in harmony with the general appearance and character of the neighborhood or district.

**Staff Analysis:** The proposed accessory structure’s placement, scale, and overall architectural design is intended to replicate the design and function of many two-story rear garage apartments established during the City’s early development in the 1920’s. The building’s design is in harmony with the general appearance and character of the district.

- (B) The project is designed and arranged in a manner that minimizes aural and visual impact on adjacent properties while affording the owner reasonable use of the land.

**Staff Analysis:** The design and arrangement of the building does not have a substantial aural or visual impact on adjacent properties and affords the property owner reasonable use of the land.

- (C) The waiver or modification will not injure the area or otherwise be detrimental to the public health, safety or welfare.

**Staff Analysis:** Utilizing a historic waiver to permit a two-story accessory structure will not be more detrimental to the surrounding area than developing a two-story addition that is in full compliance with the LDRs. Staff does not find that the waiver to allow the would be detrimental to public health, safety, or welfare.

- (D) The waiver or modification is the minimum necessary to allow reasonable use of the property while preserving its historical attributes.

**Staff Analysis:** The applicant contends in their Justification Statement that the historic waiver is the minimum necessary to allow reasonable use of the property while also preserving the character of the existing historic cottage.

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**PUBLIC COMMENT**

At the time of publication of the agenda, staff has received no public comment.

**CONCLUSION**

The proposed accessory structure is sited in an appropriate location and designed in a historically compatible manner utilizing appropriate materials that are in compliance with the City’s Historic Preservation Design Guidelines. Therefore, Staff recommends approval for the Certificate of Appropriateness for new construction. Staff recommends that the HRPB review the Historic Waiver criteria to determine if the accessory structure area limitation provision may be waived. Should the Board approve both requests, staff recommends the following conditions.

**Conditions of Approval:**

**Certificate of Appropriateness**

COA#21-00100213

1. The windows shall be recessed in the walls and shall utilize a historically compatible trim and sill detail.
2. All divided light patterns shall be created utilizing exterior raised applied muntins. External flat muntins or “grills between the glass” shall not be permitted.
3. All glazing shall be clear, non-reflective, and without tint. Low-E (low emissivity) is allowed but the glass shall have a minimum 60% visible light transmittance (VLT) measured from the center of glazing. Glass tints or any other glass treatments shall not be combined with the Low-E coating to further diminish the VLT of the glass.
4. The asphalt shingles shall be dimensional or architectural shingles. Three-tab shingles shall not be permitted.
5. The overhead garage door shall utilize a vertical plank, recessed panel, or flush panel design. Raised panel doors shall not be permitted.
6. All new improved surfaces shall be set back a minimum of 1'-0" from side property lines, subject to staff review at permitting.
7. The accessory structure shall not be utilized as an accessory dwelling unit (ADU).
8. The accessory structure shall not have kitchen facilities as defined in the City's Land Development Regulations. Future alterations that would lead to the conversion of the structure to an accessory dwelling unit (ADU) shall be prohibited. The accessory structure shall function as an extension of and subordinate to the single-family use.
9. The accessory structure shall not be granted an additional utility meter from the Public Utilities Department and shall not be issued a rental license from the Lake Worth Beach Business License Division.

**Historic Waiver (Accessory Structure Square Footage Limitation)**

HRPB#21-01600001

1. The historic waiver to allow an accessory structure at 136% of the square footage area of the principal structure shall be project specific, and shall only apply to the scope of work approved



under this application. Should any structures on the parcel be destroyed, relocated, or demolished, any future development for the parcel shall adhere to the current City of Lake Worth Beach Land Development Regulations.

**POTENTIAL MOTION**

I MOVE TO **APPROVE** HRPB Project Number(s) 21-00100213 and 21-01600001, with staff recommended conditions, for a Certificate of Appropriateness for the construction of a new 840 sq. ft. accessory structure and a historic waiver from the accessory structure area limitation provision for the property located at 226 South L Street, based upon the competent substantial evidence in the staff report and pursuant to the City of Lake Worth Beach Land Development Regulations and Historic Preservation requirements.

I MOVE TO **DENY** HRPB Project Number(s) 21-00100213 and 21-01600001 for a Certificate of Appropriateness for the construction of a new 840 sq. ft. accessory structure and a historic waiver from the accessory structure area limitation provision for the property located at 226 South L Street, based upon the competent substantial evidence in the staff report and pursuant to the City of Lake Worth Beach Land Development Regulations and Historic Preservation requirements.

**ATTACHMENTS**

- A. Property File Documentation
- B. Conceptual Review Justification Statement
- C. Current Photos
- D. Architectural Plan Set
- E. Applicant Justification – COA
- F. LWBHPDG Frame Vernacular
- G. Applicant Justification – Historic Waiver