



TOWN COUNCIL STAFF REPORT
PUBLIC HEARING

SUBJECT: HPOZ - Zoning Ordinance Amendment 2021-05

DATE OF MEETING: February 22, 2022

STAFF CONTACTS: Don Dooley, Director of Planning and Economic Development
Sally Hankins, Town Attorney

SUMMARY and RECOMMENDATIONS:

A. The Proposed Historic Preservation Overlay Zone

The Planning Commission recommends that the Town create a new zoning overlay district, to be called the *Historic Preservation Overlay Zone* ("HPOZ"). The stated purpose of the HPOZ is to *retain and conserve significant architectural and cultural heritage sites*. The proposed ordinance would accomplish this purpose by requiring that anyone seeking to demolish a principal structure within the HPOZ first either: (a) obtain prior approval from the Board of Architectural Review, or (b) if denied approval by the BAR, market the structure for sale for a period of six months.

B. Organization of the proposed zoning ordinance amendments

In order that the proposed HPOZ coordinates with the Town's existing Historic Corridor Overlay District ("HCOD"), which also regulates the demolition of historic resources, the Planning Commission proposes that the regulations be contained in three Articles of the Zoning Ordinance (Articles 14 A, B, and C). In addition, the proposed regulations would necessitate an amendment to the Town's official Zoning Map, to show the boundaries of the new HPOZ zone. These proposed actions are summarized as follows:

- 1) Adopt a new Zoning Ordinance Article 14B ("HPOZ"), to establish the new HPOZ regulations; and
- 2) Adopt a new Zoning Ordinance Article 14C ("Demolition"), which will regulate the demolition of historic resources, whether those resources are located in the HPOZ or the existing HCOD; and
- 3) Modify the existing HCOD regulations located at Article 14A of the Zoning Ordinance, by removing from Article 14A the "definitions" and the prescribed process for

demolishing a historic resource, and relocating the substance of those provisions to the newly proposed Articles 14B and 14C; and

- 4) Amend the official Purcellville Zoning Map, to show the boundaries of the new HPOZ, which shall encompass all properties that (a) are not located in the HCOD, and (b) have a historic resource located thereon.

C. Primer on the “Overlay Zoning” Tool

Overlay zoning is a regulatory tool that creates a special zoning district, which is placed over one or more base zoning districts, in a layered fashion. It is thus a zone that “lays on top of” (or, “overlays”), one or more base zoning districts. The overlay zone can share common boundaries with the base zone, or can cut across base zone boundaries.

Properties located in an “overlay zone” must comply with both sets of regulations: the regulations of the underlying base zoning district, and the regulations of the overlay zoning district. It is possible for a single property to be located in more than one overlay zone.

An overlay zoning district should have a clearly defined purpose, and should apply to all of the properties that, if regulated by the overlay, would serve that defined purpose. In the case of the HPOZ, the defined purpose is to prevent the demolition of historically contributing resources.

D. How properties were chosen for inclusion in the HPOZ

Each property proposed for inclusion in the HPOZ comes from the list of contributing resources to the *Purcellville Historic District* (“District”). The District was created based on a historic resource survey performed on behalf of the Town by *History Matters* in 2006, which identified the contributing resources within the District. The District was subsequently listed on the *Virginia Landmarks Register* in 2006, and on the *National Register of Historic Places* in 2007.

A “contributing resource” in the Purcellville Historic District represents a building or structure that helps convey the historical significance of the District. Without the contributing resource, the significance and integrity of the historic district would be diminished. Therefore, a contributing resource is considered a historic resource for its direct association with the historic district. It does not have to be individually significant on its own merits, but must retain sufficient integrity to contribute to the understanding of the historic districts’ significance.

It should be noted that the listing of the District on the state and federal registries did not create any legal obligation on the part of the property owners with contributing resources in the District, or for the Town. The Town of Purcellville never proposed to adopt the District as a local historic district, or as part of its local regulations. So, the District has remained an honorary designation.

E. Planning Commission Recommendation

After conducting two public hearings on the new HPOZ, the Planning Commission voted to recommend that Town Council approve these proposed amendments, collectively identified as “Zoning Ordinance Amendment 2021-05.”

BACKGROUND & DISCUSSION

A. Town’s Legal Authority to adopt Historic Districts

The Town’s authority to adopt the proposed HPOZ, as well as the existing HCOD, is found at Va. Code 15.2-2306.¹ The statute allows the Town to:

¹ Portions of Va. Code 15.2-2306 (Note, selected terms that are repeated in this statute have been highlighted so that the meaning of the repeated references can be more easily tracked and understood.)

A.1. Any locality may adopt an ordinance setting forth: (a) the historic landmarks within the locality as established by the Virginia Board of Historic Resources, and (b) any other buildings or structures within the locality having an important historic, architectural, archaeological or cultural interest, (c) any historic areas within the locality as defined by § 15.2-2201, and (d) areas of unique architectural value located within designated conservation, rehabilitation or redevelopment districts (Emph. added), [by] amending the existing zoning ordinance and delineating one or more historic districts, adjacent to such landmarks, buildings and structures, or encompassing such areas, or encompassing parcels of land contiguous to arterial streets or highways (as designated pursuant to Title 33.2, including § 33.2-319 of that title) found by the governing body to be significant routes of tourist access to the locality or to designated historic landmarks, buildings, structures or districts therein or in a contiguous locality. A governing body may provide in the ordinance (Emph. added) that the applicant must submit documentation that any development in an area of the locality of known historical or archaeological significance will preserve or accommodate the historical or archaeological resources. An amendment of the zoning ordinance and the establishment of a district or districts shall be in accordance with the provisions of Article 7 (§ 15.2-2280 et seq.) of this chapter. The governing body may provide for a review board to administer the ordinance and may provide compensation to the board. The ordinance may include a provision that no building or structure, including signs, shall be erected, reconstructed, altered or restored within any such district unless approved by the review board or, on appeal, by the governing body of the locality as being architecturally compatible with the historic landmarks, buildings or structures therein.

A.2. Subject to the provisions of subdivision 3 of this subsection the governing body may provide in the ordinance that no historic landmark, building or structure within any district shall be razed, demolished or moved until the razing, demolition or moving thereof is approved by the review board, or, on appeal, by the governing body after consultation with the review board.

[Note 1: Virginia Code does not define “Historic Building or Structure,” but does define “Historic Area” as follows: “Historic area” means an area containing one or more buildings or places in which historic events occurred or having special public value because of notable architectural, archaeological or other features relating to the cultural or artistic heritage of the community, of such significance as to warrant conservation and preservation.

Note 2: The “any district” text highlighted in green formerly read, “any such historic district.” Although the language has been amended, the AG and Fourth Circuit have nonetheless interpreted the phrase “any district” to mean any of the historic districts authorized by 15.2-2306(A)(1).]

- 1) identify buildings or structures with an “important historic, architectural, archaeological or cultural interest,” and
- 2) delineate one or more historic districts that encompass such buildings or structures; and
- 3) require that no such building or structure be razed, demolished, or moved until the razing, demolition or moving thereof is approved by the BAR, or, on appeal, by the Town Council after consultation with the BAR.

Before the Town may adopt a new historic district it must:

- 1) identify and inventory all buildings or structures in the areas being considered for inclusion within the proposed district
- 2) provide for public input from the community and affected property owners in accordance with Va. Code § 15.2-2204;
- 3) establish written criteria to be used to determine which properties should be included within a local historic district; and
- 4) review the inventory and the criteria to determine which properties in the areas being considered for inclusion within the proposed district meet the criteria to be included in a local historic district.

B. Purcellville Comprehensive Plan

On June 30, 2020, the town of Purcellville adopted its 2030 Comprehensive Plan in compliance with the requirements of the Code of Virginia. This broad-based public policy document expresses the community’s values and the Town’s vision of itself over the next ten years to help guide its physical development and evolution in a clear and consistent manner. It was developed through recommendations based on community engagement activities and public hearing comments that reflected citizen input. Although the Comprehensive Plan is not a regulatory document, it is the foundation on which all Town policies and regulations are based on to help implement the vision of the Comprehensive Plan. Hence, all existing and proposed regulations for the Purcellville Zoning Code should reflect the broad recommendations identified in the Town’s Comprehensive Plan.

Within the Purcellville Comprehensive Plan, there are several topical plans that provide guidance on various community assets in Town. They “... *provide recommendations for programs and practices ...[which] may occur through the Town’s development regulations or additional strategic or operational policies and plans.*” By doing so, it helps recognize, conserve, and incorporate these assets into town planning efforts. One of the identified topical plans concern historical resources in Purcellville.

C. Purcellville's Historic Resources and the Purcellville Historic District

As discussed in the Comprehensive Plan, Purcellville contains several individual properties that are recognized for their individual historical significance on both the National Register of Historic Places and the Virginia Landmarks Register. However, it is the Purcellville Historic District that is the largest historic resource in Town, as it contains 498 residential and non-residential buildings and structures deemed to contribute to the historic significance of the District. National Register Bulletin 15 defines a historic district as a place possessing “... *a significant concentration, linkage or continuity of sites, buildings, structures or objects united historically or aesthetically by plan or physical development.*”

The historic significance of the District was developed through a historic resource survey that was completed in 2006 by the firm *History Matters* on behalf of the Town, as discussed above. The historic significance of the 293-acre Purcellville Historic District is based on its architectural importance as a “...*collection of historic buildings and structures that illustrate [the] architectural and historical trends from circa 1830 to 1957 in Loudoun County, Virginia.*” The District is also significant for its association with broad patterns of history which, in this case, is related to Purcellville’s role as the commercial center of western Loudoun County in the 20th century. “*Purcellville’s history reflects local and regional trends during its period of significance; its growth was intimately linked to transportation developments in the 19th and 20th centuries and to municipal improvements in the early 20th century*” according to the National Register nomination prepared by *History Matters*.

The listing of the Purcellville Historic District on the state and federal landmark registries does not create any legal obligation on the part of the Town, or on the part of the owners of the contributing historic properties within the District. Creation of the Purcellville Historic District was not a legislative act by the Town Council, and did not create local law. The listing on these state and federal registries does not provide state or federal protection to the District, or to the contributing properties comprising the District. The Town’s zoning authority relative to the properties that comprise the District continues to come only from Va. Code 15.2-2306.

Purcellville’s 2030 Comprehensive Plan Recommendations for Historic Resources

As stated in the 2030 Purcellville Comprehensive Plan concerning historic resources, it is recommended [that the Town] “... *consider in all land use and development decisions to continue practicing and incorporating historical resources into the fabric and character of Purcellville*” in addition to 12 specific recommendations that include having the Town, “*Consider amending the Town’s historic zoning overlay district to be more inclusive of all*

historically contributing structures even in non-contiguous areas and entertain recommendations from relevant entities to expand recognition of historic assets within Town.”

D. The HCOD

Currently, the only Town ordinance that establishes a historical district is the Historic Corridor Overlay District (“HCOD”), located at Zoning Ordinance Article 14A, which was adopted under the authority of Va. Code 15.2-2306. The HCOD, among other things, regulates the demolition of historical resources. By its terms, the Town’s HCOD is located on the following streets, as well as all parcels of property adjacent to such streets:

- 1) Main Street (Route 7 Business)
- 2) Route 287
- 3) Route 690 North (23rd and 21st Street)
- 4) Route 690 South (32nd Street).
- 5) Route 1604 (21st Street between Main and 23rd Streets)

The stated purposes of the HCOD, as listed under “Intent,” are to:

- 1) Protect the town's unique historical and architectural character,
- 2) Ensure that new development is in keeping with the small-town character of Purcellville,
- 3) Encourage aesthetic treatment along the entrances to town to provide an attractive entry into the historic town core, and
- 4) Promote tourism and visitor opportunities through historic preservation and Main Street revitalization

The HCOD also states under “Applicability” that the ordinance is created to conserve certain elements of the Town's historic character – those elements that are located along identified street corridors – and to protect those corridors.

E. Planning Commission Public Hearing of July 15, 2021

At the Planning Commission public hearing on July 15, 2021, the Commission received comments on its proposal to (i) expand the existing HCOD boundaries to incorporate all historic resources located outside of the HCOD, and (ii) amend the text of the HCOD regulations in the manner detailed in the Planning Commission Staff Report dated July 15, 2021 (see Attachment No. 7). However, the Commission received numerous public comments in opposition to the proposed changes, as documented in the Planning Commission Staff Report for the November 18, 2021, meeting (Attachment No. 8), and, in response, amended its proposal.

F. Revisions to the Planning Commission's Preservation Project Initiative

Subsequent to the July 15, 2021, Planning Commission meeting, the Commission held several public meetings to determine how to best address citizen comments and concerns while balancing the goal of trying to preserve the character defining features of the Town's historic resources. The Commission also desired to enhance the Town's review process for proposed demolition requests to historic resources by only applying the lightest touch possible when considering changes to the HCOD regulations in Article 14A.

In reframing the Commission's preservation and demolition initiatives, based on the Town's 2030 Comprehensive Plan recommendations and prior public input, the Commission proposed to:

- 1) No longer expand the HCOD. Instead, the Commission believed it was best to create a new zone: a historic preservation overlay zone that would include all of the Town's individually designated historic properties as well as contributing historic resources to the *Purcellville Historic District* that lay outside of the current HCOD. The new historic overlay is proposed to be named the "*Historic Preservation Overlay Zone*";
- 2) Incorporate the proposed HPOZ into the official Purcellville Zoning Map, to include all historic properties located outside of the existing HCOD;
- 3) Create regulations that would govern properties located in the HPOZ. The ordinance would also include new and updated word definitions for historic resource management/administration;
- 4) Establish proposed Article 14C within the Purcellville Zoning Ordinance that would regulate the demolition of all historic resources within the HCOD (under Article 14A) and in the proposed HPOZ (under Article 14B). In the HPOZ, demolition approval for a historic building by the Board of Architectural Review (BAR) would only be required when it is a historic resource and used as the principal building to serve the property; and,
- 5) Modify Article 14A by removing sections of the Article, as they pertain to demolition regulations and word definitions, and recodify the provisions (with some modifications) within Articles 14B and 14C, as applicable.

G. Planning Commission Meeting of November 18, 2021

On November 18, 2021, the Commission held a second public hearing to take public comments and obtain feedback on the initiated changes proposed by the Commission to Articles 14A, 14B, and 14C. This was based on the public hearing comments received by the

Commission on July 15, 2021, as well as from the public meetings held on July 28, 2021, and September 9, 2021. To understand the principal changes made by the Planning Commission, staff has provided an expanded summary of the specific text and changes to each article below.

Article 14A (see Attachment 3): Article 14(A) was modified to delete and move the word definitions contained within Section 2.4 (Definitions) and place them in Section 3 of proposed Article 14B. The purpose for doing so was to provide a more sensible location in the zoning ordinance for definitions that pertain strictly to historic resource matters. Similarly, the provisions concerning demolition requests for historic resources within Section 2.7 (Demolition permit and approval) of Article 14A was moved into Article 14C, as demolition requests within the existing HCOD and the proposed HPOZ will be centralized into a single zoning article (Article 14C) to apply to both overlay zones. Finally, Section 8.3 (Demolition criteria) of Article 14A was deleted and relocated into Article 14C to apply to both the HCOD and HPOZ. For ease of use, a reference to the sections of Article 14A that have been moved into either Article 14B or Article 14C have been identified in Article 14A.

Article 14B (see Attachment 4):

Properties to be Included: Proposed Article 14B has been crafted to establish the HPOZ. The HPOZ proposes to include 283 properties – all of which (i) are located outside the existing HCOD, and (ii) have a principal building that is either *individually* designated as a historic resource, or is identified as a *contributor* to the Purcellville Historic District. The HPOZ, as proposed, does not change the historical status of the properties to be included. Instead, the HPOZ *reflects* the status already assigned to those properties.

Removal from the District: Several property owners have asked whether the Town can remove their property from the existing Purcellville Historic District, and the answer is, no. The Town does not have the authority to remove any existing historic resource designation (even contributing resources to a historic district) given to a property by the Virginia Department of Historic Resources or by the National Parks Service. Those are separate and distinct historic resource programs established and operated under state and federal authority. As discussed above, however, landmark designation status is honorary and does not carry any additional state or federal regulations, including tax burdens.

Defined Terms. In order to coordinate and consolidate the historical resource terminology utilized in both the HPOZ and the HCOD, the definitions are being removed from Article 14A and consolidated into Article 14B. In addition, these definitions are being refined for administrative clarity and to provide greater understanding of their meaning and

application. Two new definitions have been added to include, “Principal Building,” and “Demolition.” As proposed, the definition of “Demolition” is to mean the following:

The destruction, in whole or in part, of a resource. Demolition of a building, structure or object shall mean the destruction of greater than twenty-five percent (25%) of all exterior wall surfaces to a building, structure or object regardless of its visibility from the public right-of-way. Demolition of a building, structure or object shall not include the demolition of a single exterior wall to build an addition, even if such wall exceeds twenty five percent (25%) of the aggregate exterior wall surface area. The mere replacement of any material fabric on a building, structure or object shall not constitute demolition of an exterior wall. Moving a building, structure, or object off of its current foundation(s) to relocate elsewhere shall not constitute demolition.

This is a keystone definition as it specifies what type of activities trigger the demolition requirements contained in Article 14C that necessitate the approval of a certificate of design approval by the Board of Architectural Review (BAR). The intent of the definition is to provide flexibility to enable certain additions or modifications to historic resources to occur without requiring a certificate of design approval by the BAR.

Article 14C (see Attachment 5): Proposed Article 14C addresses demolition standards, protocols, and review criteria that will apply to demolition requests of historic resources.

One of the key components of Article 14C is the demolition criteria under Section 3 (Demolition Criteria), which sets forth standards to guide the BAR in evaluating the impact of a proposed demolition or relocation of a historic resource. The BAR’s evaluation of the historic integrity of the building will help determine not only the resource’s historic value, but also the impacts of its removal upon the integrity of other historic resources around it.

Another key provision within proposed Article 14C is the right to demolish a historic resource, after an application for demolition has been denied by the Board of Architectural Review. Under the Code of Virginia, a property owner has the right to demolish any historic resource they own, even if the demolition is denied, subject to certain procedural requirements. While state code provides that a property may be demolished after 12 months on the market, the proposed ordinance reduces that time to 6 months. The Planning Commission believed this was a more equitable balance between trying to encourage the preservation of a historic resource with the rights of a property owner to demolish improvements on their property. In drafting this provision, the Planning Commission

deleted Section 2.7 (Demolition permit review and approval) of Article 14A and replaced it with Section 6 (Right to Demolish After Denial of Application) of Article 14C.

During the Planning Commission meeting of November 18, 2021, there were still several residents that did not endorse the Commission's subsequent, revised, changes to Articles 14A, 14B and 14C since the July 15, 2021, public hearing. Likewise, many residents did not support the creation of the proposed HPOZ and the enabling Articles for a variety of reasons (i.e., an overreach of private property rights, the proposed HPOZ is not voluntary to join, and the perceived ability for the Articles to meet legal muster). After significant discussion, it was the consensus of the Planning Commission that the previously-described modifications to Articles 14A, 14B and 14C were sufficient to balance the residents' concerns with the public interest in protecting the Town's historic resources that lay outside the existing Historic Corridor Overlay Zone.

H. Planning Commission Meeting of December 2, 2022

At the Planning Commission meeting of December 2, 2022, the Commission made one adjustment to Article 14C:

The prior version of Article 14C allowed a person who was denied permission to demolish a structure the option to market for sale only the historic *structure*, and not the *land* underneath the structure. This provision was intended to address the problem that arose when an ancillary structure was denied demolition, requiring the property owner to sell the entire property since it is not possible to sell only the land underneath an ancillary structure. Because the ancillary structures had since been exempted from the demolition regulations altogether, this provision was no longer needed. Therefore, the Planning Commission amended the text to require that anyone denied permission to demolish a principal structure must market for sale both the structure and the land to which the structure is attached.

With that modification, the Commission voted unanimously (6-0-0) to recommend to the Town Council approval of the HPOZ for inclusion onto the official Purcellville Zoning Map. The Commission's recommendation also includes that the Council adopt the proposed amendments to Article 14A and the adoption of draft Articles 14B and 14C.

I. The Issue of Historic Resource Integrity

From a preservation planning standpoint, one of the key elements when developing an effective and meaningful historic preservation ordinance is to have codified language that is grounded in the concept of "historic integrity." Historic integrity is the unimpaired ability of a building, structure, object or site to convey its historic significance based on the observer's understanding of the resource's remaining physical features and how they contribute to the

resource being able to visually convey its historic significance. Location, materials, design, workmanship, setting, association and feeling are the seven aspects or qualities that a resource must generally retain, in various combinations, when considering the level of integrity, a resource embodies. Understanding which aspects of integrity are the most important to a resource depends on knowing why the resource is significant. For example, the three most important aspects of integrity for an architecturally significant building is the retention of its original design, materials and workmanship. In short, if a resource does not retain sufficient integrity to convey its historic significance for a particular landmark designation criterion, it cannot be considered a historic resource in mainstream historic preservation practice. It is also important to realize that the physical condition of a resource is not the same as integrity. A dilapidated building can still retain a high degree of historic integrity (even if it is not structurally sound) so long as it retains the aspects of integrity it needs to be able to convey its historic significance to an observer.

From staff's perspective, one of the significant challenges the Commission faced in developing the HPOZ, was trying to promote historic preservation while minimizing the regulatory requirements on property owners whose historic buildings and structures would be located in the proposed HPOZ. Especially as numerous residents expressed concern to the Commission about their property rights and being overregulated. The Planning Commission tried to balance these interests by lessening the burden on property owners, by: (i) defining "demolition" to allow some level of demolition-by-right (up to 25% of the structure), (ii) allowing the full demolition of accessory structures as a matter of right, and (iii) allowing the wholesale replacement of materials on a building or structure, without review by the BAR.

As there are no codified provisions within Articles 14B, 14C or within the Purcellville Zoning Ordinance requiring the *preservation* of any historic resource's integrity, insensitive changes made to historic buildings and structures in the proposed HPOZ will invariably occur over time that diminish or destroy an individual resource's ability to convey its historic significance. Consequently, it will also erode the overall historic integrity of the Purcellville Historic District. Therefore, is quite possible that the demolition provisions proposed by the HPOZ could result in trying to preserve a building or structure that is no longer worth saving, if its historic integrity has been previously compromised by inappropriate or insensitive changes. This is an important consideration when trying to balance historic preservation goals with citizen concerns.

J. The Issue of Meaningful Preservation

In 2005, the Town adopted the *Historic Corridor Overlay District* (HCOD), located at Article 14A of the Zoning Ordinance. Although sympathetic to historic resources, the intent of the HCOD is primarily to promote the Town's existing community character and aesthetics, through attractive entry corridors into the Town's "historic core" for the purpose of encouraging tourism and visitors. As discussed above, proposed Article 14B (creating the Historic Preservation Overlay Zone), is focused on retaining historic resources by deterring their active demolition. However, neither the HCOD nor the proposed HPOZ provides meaningful protection to historic resources in a manner consistent with mainstream or best historic preservation practices used and promoted by the National Park Service and the Virginia Department of Historic Resources. As proposed, the HPOZ requires BAR approval only when the demolition is proposed to more than 25-percent of a historic principle building. And, no BAR approval is required to demolish a historic accessory structure, or to remodel a historic exterior façade. Best practices are, in part, grounded in the concept of historic integrity, as discussed throughout this report, and understanding the significance of the historic resource in question as well as its character defining features. Should the Council wish to strengthen the Purcellville Historic District's long-term integrity in a way that will also promote a sense of place, heritage tourism, and other opportunities for the Town, then the Council could consider directing the development of a historic resource ordinance dedicated solely to the Purcellville Historic District. Doing so would be consistent with the Town's *2030 Comprehensive Plan*.

BUDGET IMPACT:

The Engineering, Planning and Development Department contracted with CHA Consulting, Inc. for \$2,900, to amend the Purcellville Zoning Map to show the proposed boundaries of the HPOZ.

The required newspaper advertisements for the 3 public hearings to-date has cost approximately \$12,000.

If the proposed ordinances are adopted, there may be additional resulting applications to the BAR, but there should be no additional out-of-pocket costs from the Town's general fund.

MOTIONS:

No motions are recommended for the night of the public hearing.

ATTACHMENTS:

- 1) Town of Purcellville Town Council Public Hearing Notice for February 22, 2022
- 2) Adopted Planning Commission Initiating Resolution No. 21-01-03
- 3) Proposed Amendments to Article 14A (Historic Corridor Overlay District – HC)
- 4) Proposed Article 14B (Historic Preservation Overlay Zone)
- 5) Proposed Article 14C (Demolition)
- 6) Proposed HPOZ Map
- 7) Planning Commission Staff Report for July 15, 2021
- 8) Planning Commission Staff Report for November 18, 2021
- 9) Planning Commission Letter to the Town Council dated December 2, 2021/Town Council Staff Report Dated December 14, 2021
- 10) Public Comments Received by the Town Concerning Zoning Ordinance Amendment 2021-05 from June 30, 2021 through February 18, 2022

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