

Board of Zoning Adjustment Staff Report

September 21, 2015



Case No:	15Variance1052
Project Name:	New Elevated Deck and Elevator
Location:	2138 Baringer Avenue
Owner(s):	David Roth
Applicant:	Owner
Representative:	Ted Blessoud, Blessoud Architecture
Project Area/Size:	0.275 acres
Jurisdiction:	Louisville Metro
Council District:	8 – Tom Owen
Case Manager:	Sherie' Long, Landscape Architect

REQUEST

Variance from the Land Development Code Chapter 5, Section 5.4.1D.2, to allow a reduction in the 30% required private yard.

Location	Requirement	Request	Variance
Private Yard	3,600sf (30%)	2,872sf (24%)	728sf (6%)

CASE SUMMARY/BACKGROUND/SITE CONTEXT

The applicant is proposing to construct a new elevated deck and a three story elevator tower at the rear of the existing condominium structure. This property located on the south side of Baringer Avenue is in the Cherokee Triangle Historic Preservation District. The applicant has received approval to construct the new elevated deck and elevator tower from Landmarks Preservation Staff. Due to the location of the new deck and elevator a variance is needed for a reduction of the required private yard.

LAND USE/ZONING DISTRICT/FORM DISTRICT TABLE

The site is zoned R-5B within the Tradition Neighborhood Form District (TN). It is surrounded by single family residential, and multi-family residential property zoned R-5B in the Traditional Neighborhood Form District (TN).

	Land Use	Zoning	Form District
Subject Property			
Existing	Multi-family Residential	R-5B	TN
Proposed	NA		
Surrounding Properties			
North	Single-family and Multi-family Residential	R-5B	TN
South	Single-family and Multi-family Residential	R-5B	TN
East	Single-family and Multi-family Residential	R-5B	TN
West	Single-family and Multi-family Residential	R-5B	TN

PREVIOUS CASES ON SITE

- 15COA1144 Certificate of Appropriateness from the Historic Landmarks and Preservation Districts Commission to construct a new elevated deck and a three story elevator tower at the rear of the existing condominium structure approved with conditions on July 30, 2015. (This approval amended case 15COA1037)
- 15COA1037 Certificate of Appropriateness from the Historic Landmarks and Preservation Districts Commission to construct a three story elevator tower at the rear of the existing condominium structure approved with conditions on March 19, 2015.
- 9846 Certificate of Appropriateness from the Historic Landmarks and Preservation District Commission for an after-the-fact glass block window installation denied November 10, 2007

INTERESTED PARTY COMMENT

No inquiries have been received.

APPLICABLE PLANS AND POLICIES

Land Development Code

STANDARD OF REVIEW AND STAFF ANALYSIS FOR VARIANCE

Variance from the Land Development Code Chapter 5, Section 5.4.1D.2, to allow a reduction in the 30% required private yard.

- (a) The requested variance will not adversely affect the public health, safety or welfare.

STAFF: The variance will not adversely affect the public health, safety or welfare because the existing private yard area reduction is minimum. Plus an additional 1,276sf of yard area is available for use by the owners east of the elevated deck and elevator tower.

- (b) The requested variance will not alter the essential character of the general vicinity.

STAFF: The requested variance will not alter the general character. The existing private yard and the additional east rear yard area will be maintained. Both sides of the rear yard (east and west) can be accessed from under the elevated deck.

- (c) The requested variance will not cause a hazard or nuisance to the public.

STAFF: The requested variance will not cause a hazard or nuisance to the public because the existing private yard, west of the improvements, and additional rear yard area, east of the improvements, will be maintained. Plus the yard area is enclosed by a fence.

- (d) The requested variance will not allow an unreasonable circumvention of the zoning regulations.

STAFF: The requested variance will not allow an unreasonable circumvention of the zoning regulations since a variance is required. Plus the existing private yard area will be maintained and there is access under the elevated deck to other rear yard area on the east side of the property.

ADDITIONAL CONSIDERATIONS:

1. The requested variance arises from special circumstances which do not generally apply to land in the general vicinity or the same zone.

STAFF: The requested variance does arise from special circumstances. The existing private yard area is greater than 30% of the site, however when the elevator tower and elevated deck are constructed the yard area is divided into two smaller sections. These smaller sections do not meet the requirements to be compliant with the regulations; being a contiguous open space; at least 20 feet wide; and an area containing a minimum of 30% of the site. The two smaller yard areas however, do contain open space area which is greater than 30% of the site.

2. The strict application of the provisions of the regulation would deprive the applicant of the reasonable use of the land or create an unnecessary hardship on the applicant.

STAFF: The strict application of the provisions of the regulation would create an unnecessary hardship on the applicant because the proposed elevated deck and elevator tower could not be built. The addition of the elevator tower is to allow access to all the floors for any owners or guest who may have mobility difficulties.

3. The circumstances are the result of actions of the applicant taken subsequent to the adoption of the zoning regulation from which relief is sought.

STAFF: The circumstances are not the result of actions of the applicant taken subsequent to the adoption of the zoning regulation from which relief is sought since the applicant is requesting a variance prior to construction.

TECHNICAL REVIEW

There are no technical review issues.

STAFF CONCLUSIONS

Based upon the information in the staff report, the analysis of the standards of review support the request to grant the variance, therefore, the Board of Zoning Adjustment must determine if the proposal meets the standard for a variance established in the Development Code based on the testimony and evidence provided at the public hearing.

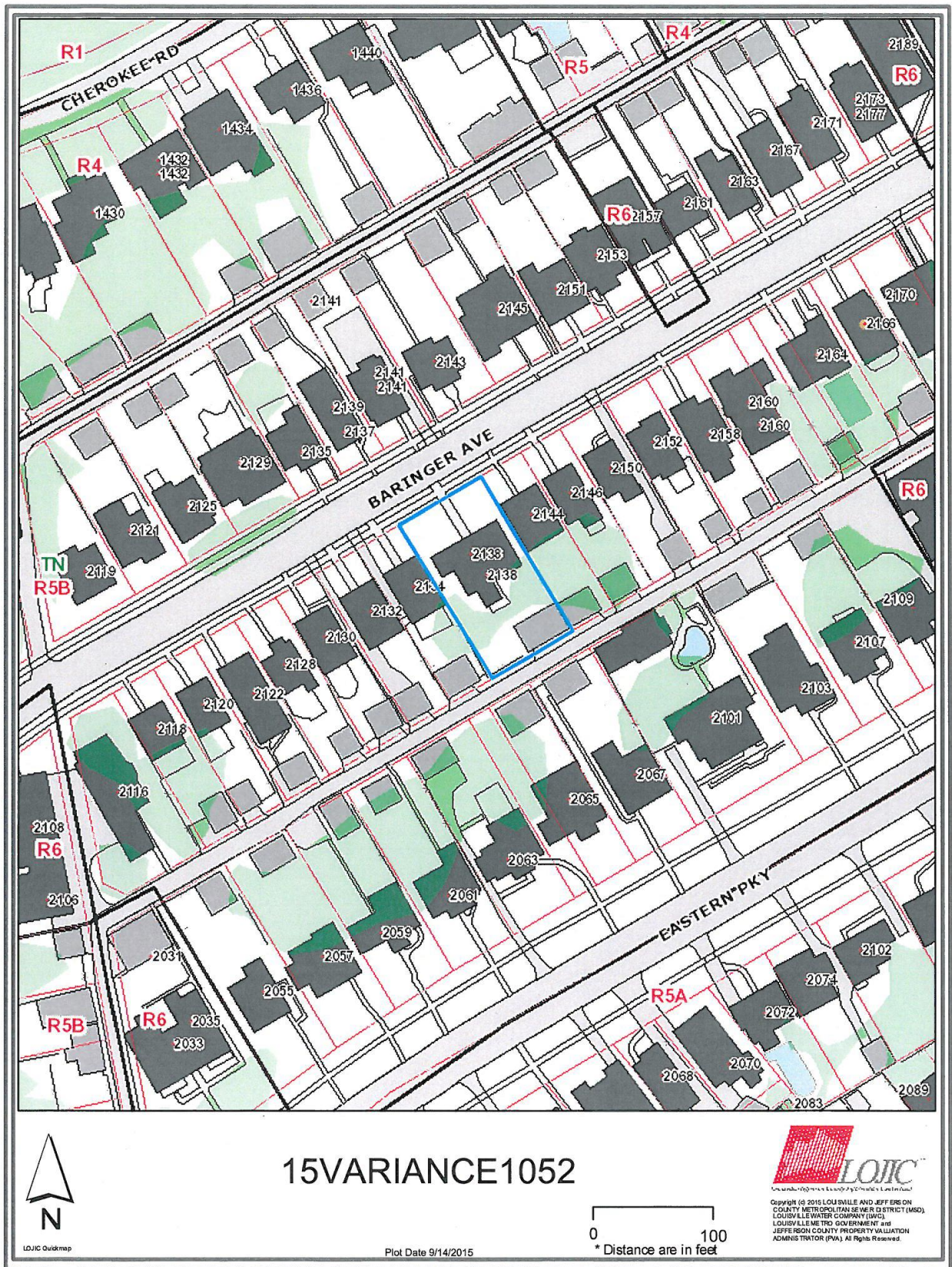
NOTIFICATION

Date	Purpose of Notice	Recipients
09/01/2015	BOZA Hearing	Neighborhood notification recipients
09/03/2015	BOZA Hearing	1 st tier adjoining property owners
09/01/2015	Sign Posting	Subject property

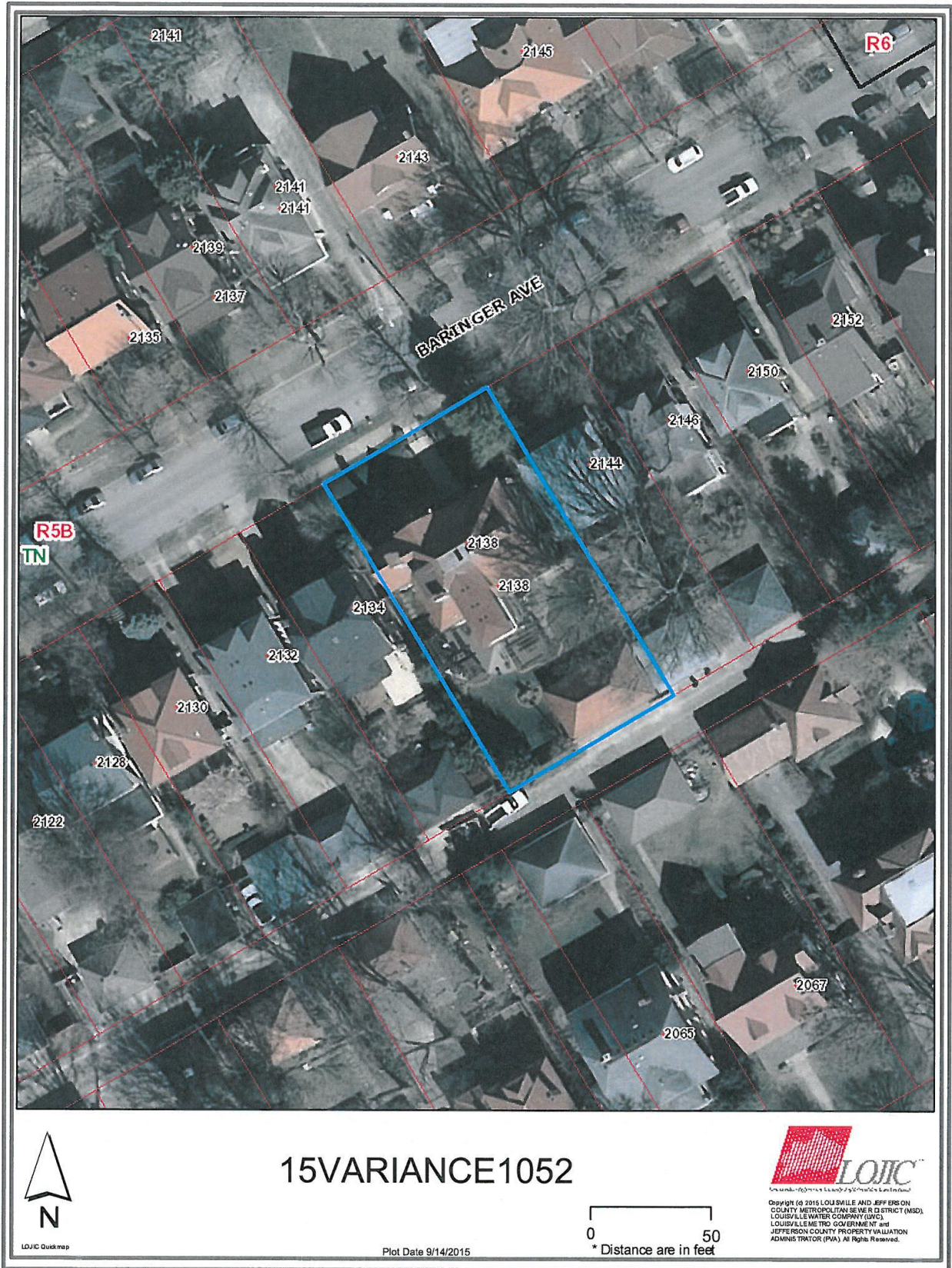
ATTACHMENTS

1. Zoning Map
2. Aerial Photograph
3. Site Plan
4. Elevations
5. Applicant's Justification Statement
6. Site Photographs
7. Certificate of Appropriateness

Attachment 1: Zoning Map:



Attachment 2: Aerial Photo:



Attachment 3: Site Plan:

- NOTES:
1. Site is subject to all right-of-ways, easements and restrictions of record or implied.
 2. The surveyor did not make a search for easements, encumbrances, restrictions, ownership title evidence or other records that a complete and accurate title search may disclose.
 3. The certification of this survey is made of this date and is subject to any future facts that more accurately describe or establish the boundary shown herein.
 4. Surrounding owner information is shown per PVA records.
 5. The basis of bearing was taken from the record condo plat.
 6. This site is located in Zone X per Firm Map 211100048 E dated December 5, 2008 and is not located within a 100 year flood plain (0.1% chance). Flood Plain Certification is restricted to a review of the firm and shall not be construed as a confirmation or denial of flooding potential.

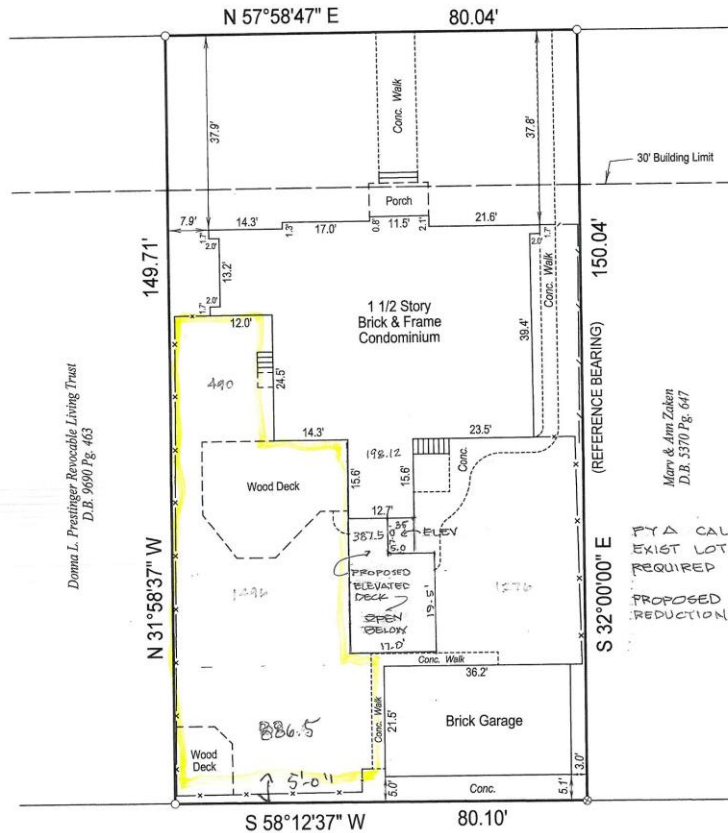
Being Lots 27 & 28, Block 2 recorded in Baringer Land Co. Subdivision Plat Book 2, Page 272, also being Baringer Place Condominiums, recorded in Apartment Ownership Book 76 Pages 35 & 36, and corrected in Apartment Ownership Book 130 Page 81



LOCATION MAP
No Scale



BARINGER AVENUE 60' R/W
(D.B. 894 Pg. 87)



Donna L. Prestinger Revocable Living Trust
D.B. 9690 Pg. 403

Mary & Ann Zaiken
D.B. 5370 Pg. 647

PVA CALCULATIONS
EXIST LOT SIZE 12,000 SF
REQUIRED PVA .30
PROPOSED PVA 3,600 SF
REDUCTION 2812
728

S 58°12'37" W 80.10'

20' ALLEY
(D.B. 894 Pg. 87)



LEGEND
⊕ = Existing cross cut
○ = Existing 3/4" Pipe



LAND SURVEYORS CERTIFICATE

I hereby certify that the survey depicted by this plat was done by me or by persons under my direct supervision on February 5, 2015 by the method of random traverse. The unadjusted precision ratio of the survey is 1:11,486 and was not adjusted. The survey as shown hereon is an "Urban" Survey and the accuracy and precision of said survey meets all the specifications of this class.

William D. Schroll III Date 2-11-15
Professional Land Surveyor, Kentucky Registration No. 3570

RECEIVED
JUL 31 2015
DESIGN SERVICES

BOUNDARY SURVEY
This Survey complies with KAR 18:150

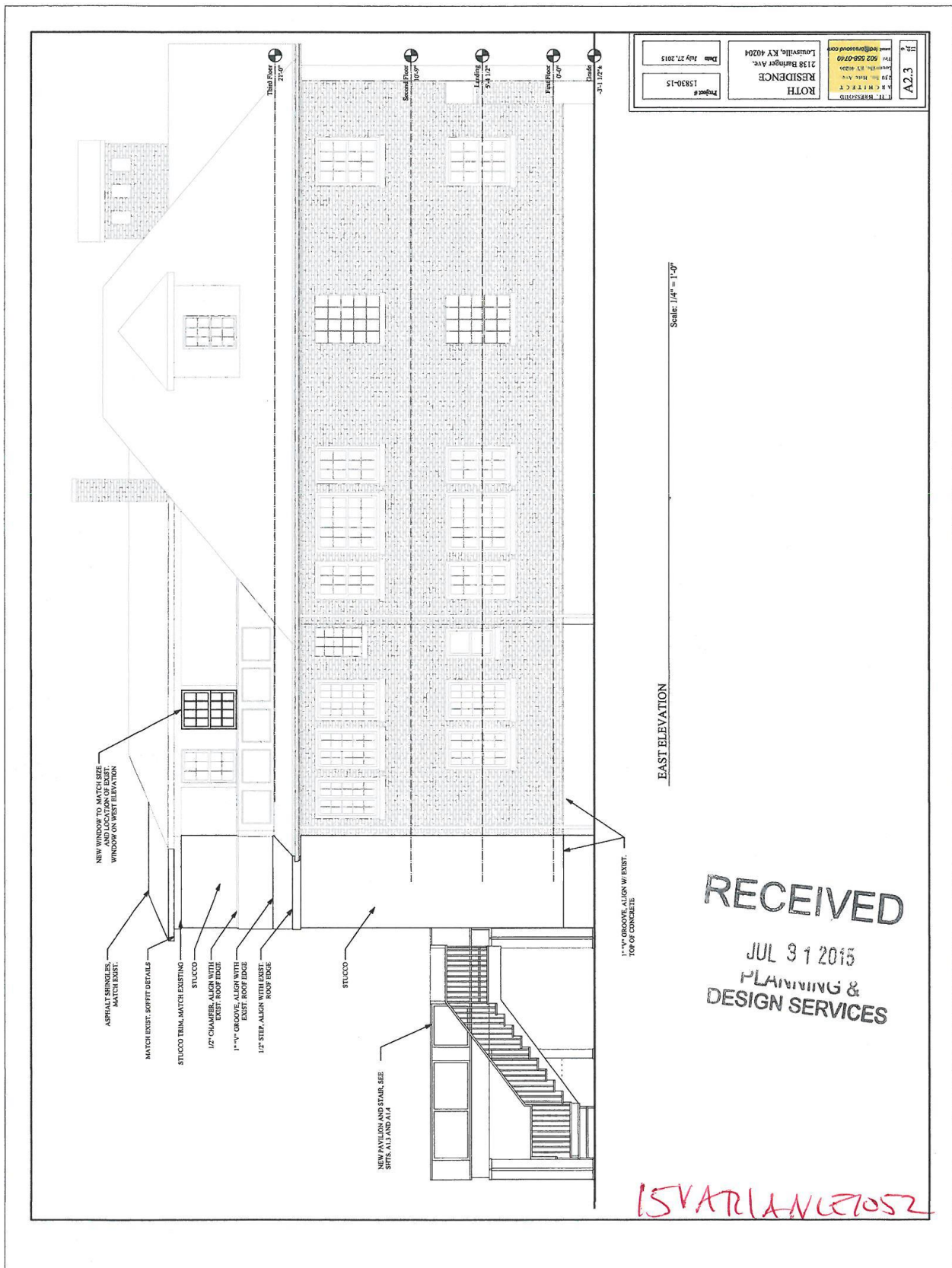
Survey of: 2138 Baringer Avenue
Louisville, Ky. 40204
Owner: Leslie Huber
3592 Quarry Rd, New Albany, In. 47150
Source of Title: D.B. 7631 Pg. 929
For:

Ordered By: Ted Bressoud
Scale: 1" = 20'
Drawn Date: 2/10/15
Job No: 1481/15
Drawn By: Bill Schroll

SCHROLL LAND SURVEYING LLC.
5450 Southview Dr., LOUISVILLE, KY. 40214
Phone: 502-367-7660
Mobile: 502-594-6773

15VARIANCE1052

Attachment 4: Elevations



Project # 15830-15	Date July 27, 2015	ROTH RESIDENCE 2138 Balmora Ave. Louisville, KY 40204	H. HARRINGTON ARCHITECT 1000 W. MARKET ST. LOUISVILLE, KY 40203 TEL: 502-586-0760 FAX: 502-586-0760 h.harrington@harrington.com	A2.3 1/8"
-----------------------	-----------------------	--	---	--------------

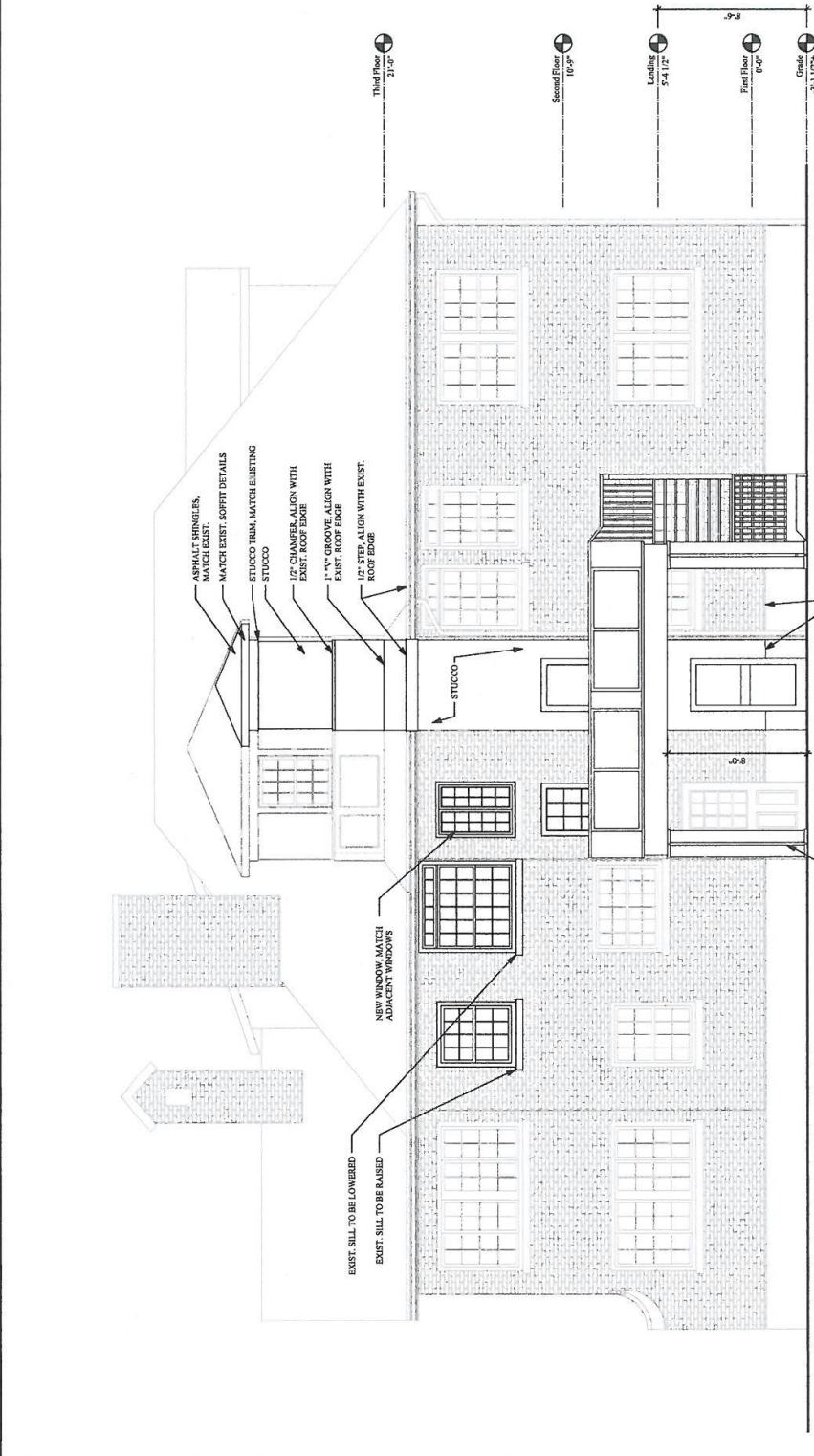
Scale: 1/4" = 1'-0"

EAST ELEVATION

RECEIVED
 JUL 31 2015
 PLANNING &
 DESIGN SERVICES

15VARIANCE1052

Project #	15830-15
Date	July 27, 2015
Client	ROTH RESIDENCE 2138 BATHURST AVE. LOUISVILLE, KY 40204
Architect	PLANNING & DESIGN SERVICES 1000 W. MARKET ST. SUITE 200 LOUISVILLE, KY 40202 TEL: 502.558.0700 WWW.PDSDESIGN.COM
Sheet	A2.2



Grade -3'-1 1/2"
First Floor 0'-0"
Landing 3'-4 1/2"
Second Floor 10'-0"
Third Floor 21'-0"

NEW PAVILION AND STAIRS SEE SHEETS A1.3 AND A1.4

1" x 4" GROOVE, ALIGN W/ EXIST. TOP OF CONCRETE

STUCCO

1/2" CHAMFER, ALIGN WITH EXIST. ROOF EDGE

1" x 4" GROOVE, ALIGN WITH EXIST. ROOF EDGE

1/2" STAIR ALIGN WITH EXIST. ROOF EDGE

STUCCO TRIM, MATCH EXISTING STUCCO

MATCH EXIST. SOFFIT DETAILS

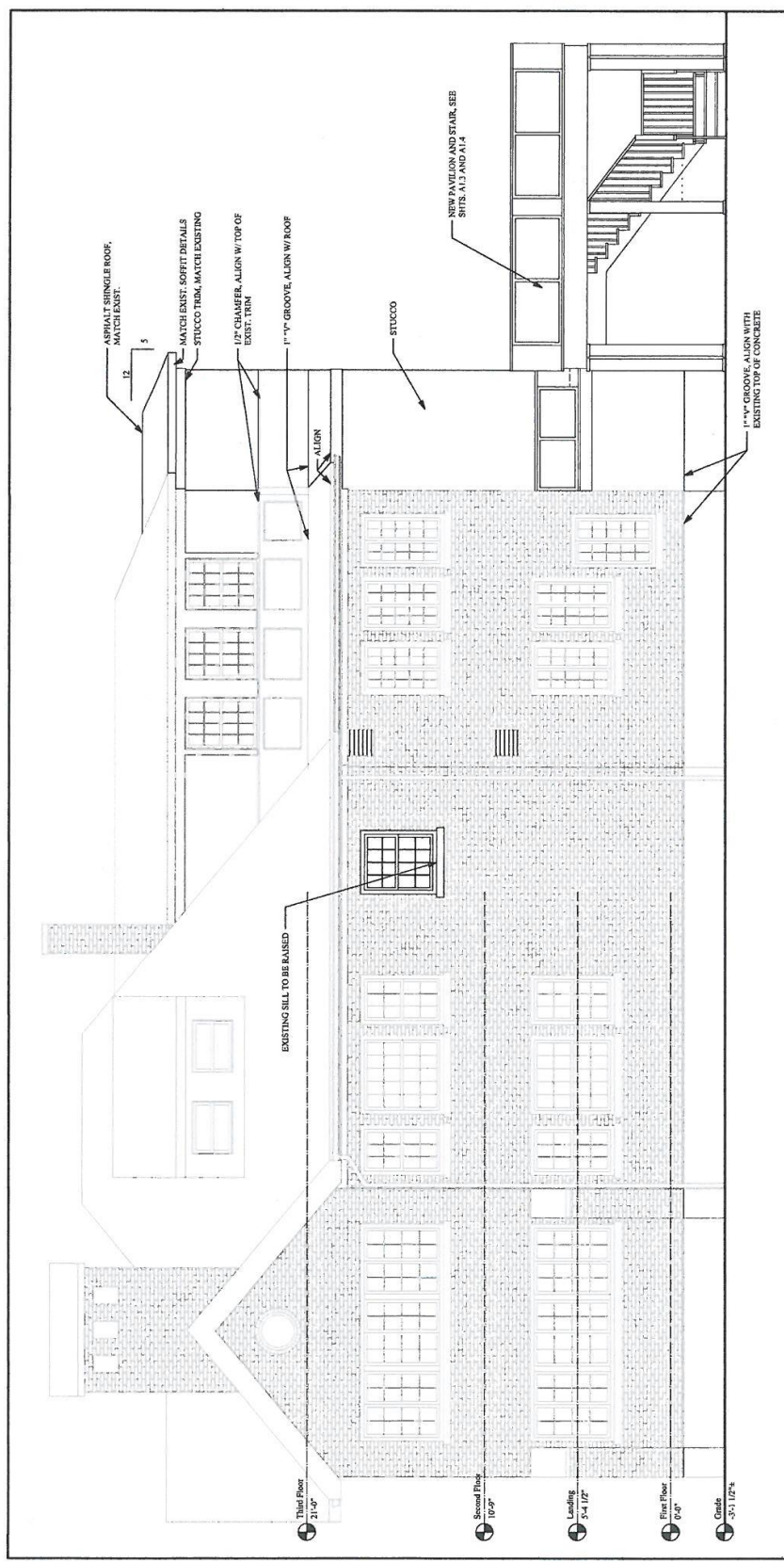
ASPHALT SHINGLES, MATCH EXIST.

Scale: 1/4" = 1'-0"

RECEIVED
JUL 31 2015
PLANNING &
DESIGN SERVICES

15VARIANCE1052

Project #	15830-15
Date	July 27, 2015
Client	ROTH RESIDENCE
Address	2138 Baringer Ave. Louisville, KY 40204
Architect	J.P. BOZA ARCHITECTS 1000 N. 2ND ST. SUITE 200 LOUISVILLE, KY 40202 Tel: 502.556.0700 Fax: 502.556.0700 jboza@jbozarch.com
Sheet	A2.1



Scale: 1/4" = 1'-0"

WEST ELEVATION

RECEIVED
 JUL 31 2015
 PLANNING &
 DESIGN SERVICES

15VARIANCE1052

Attachment 5: Applicant's Justification Statement

Variance Justification:

In order to justify approval of any variance, the Board of Zoning Adjustment considers the following criteria. Please answer all of the following items. Use additional sheets if needed. A response of yes, no, or N/A is not acceptable.

1. Explain how the variance will not adversely affect the public health, safety or welfare.

It is in a private fenced area.

2. Explain how the variance will not alter the essential character of the general vicinity.

It is architecturally in keeping and generally hidden from public view.

3. Explain how the variance will not cause a hazard or a nuisance to the public.

There are no hazards or nuisances outside of normal construction.

4. Explain how the variance will not allow an unreasonable circumvention of the requirements of the zoning regulations.

It is a minor reduction.

RECEIVED
JUL 31 2015
PLANNING &
DESIGN SERVICES

Additional consideration:

1. Explain how the variance arises from special circumstances, which do not generally apply to land in the general vicinity (please specify/identify).

The second floor condo does not have access to direct outdoor space.

2. Explain how the strict application of the provisions of the regulation would deprive the applicant of the reasonable use of the land or would create unnecessary hardship.

No direct or dedicated outdoor space for 2nd floor unit.

3. Are the circumstances the result of actions of the applicant taken subsequent to the adoption of the regulation from which relief is sought?

No.

15VARIANCE1052

Attachment 6: Site Photographs



Looking toward rear of the Condominiums from the rear property line



Looking at private yard area from rear property line



Looking at the private yard area from the east rear yard area



Looking from the east rear yard toward the location of the proposed improvements.



Existing east rear yard



Existing east rear yard



**Historic Landmarks and Preservation
Districts Commission**

Certificate of Appropriateness

To: Ted Bressoud
Thru: Bob Keesaer, AIA, NCARB- Urban Design Administrator
From: Andrea Lauago, Associate Planner
Date: July 30, 2015

Case No: 15COA1144-CT
Classification: Staff Review

GENERAL INFORMATION

Property Address: 2138 Baringer Avenue

Applicant: Ted Bressoud
Bressoud Architecture
230 S. Hite Avenue
Louisville, Kentucky 40206
Ph. 502-558-0740
ted@bressoud.com

Owner: David Roth
2138 Baringer Avenue
Louisville, KY 40204
Ph. 502-548-1990

Estimated Project Cost: \$ 180,000.00

Description of proposed exterior alteration:

This application is an amendment to previously approved case 15COA1037. The applicant requests approval to construct a three-story elevator tower at the rear of the building. The exterior of the tower will be stucco and roofing material to match the adjacent 3rd floor addition (red fiberglass shingle). To accommodate the new tower, windows on the rear of the home will be reconfigured and door added. The amendment to the previously approved proposal includes the addition of a 2nd-story deck at the rear of the home and elevator tower. The railing around the deck will be stucco panels designed to match the panels on the third floor addition. Additionally, another door will be added to the elevator tower at the 2nd-story facing the rear.

Communications with Applicant, Completion of Application

The application was received on July 24, 2015. The application was determined to be complete and classified as requiring Staff Review on July 27, 2015. Staff

Case #: 15COA1144
Page 1 of 7

contacted the applicant to clarify the amendments to the previous application and discuss the need for a variance for Private Yard encroachment.

FINDINGS

Guidelines

The following design review guidelines, approved for the Cherokee Triangle Preservation District, are applicable to the proposed exterior alteration: **Addition and Window**. The report of the Commission Staff's findings of fact and conclusions with respect to these guidelines is attached to this report.

The following additional findings are incorporated in this report:

Site Context/ Background

The R5B zoned property is located on the south side of Baringer Avenue 10 lots east of Willow Avenue. The housing stock along Baringer Avenue is comprised primarily of early twentieth century buildings in Craftsman and Revival architectural styles. This building is divided into two condominium units.

Constructed circa 1940, this is a Mediterranean Revival building type with irregular massing. The two-story frame structure rests on a concrete foundation and is clad with blond brick veneer. A red tile roof with decorative ridge caps sheaths the hipped-on-gable roof. A cross-gable projection breaks the façade to the west of the entrance. The main entrance is surmounted by a tiled pent roof. Architectural ornamentation includes bas relief panels, brackets, scrolls and a balconette window.

The majority of the windows are double-hung sash wood windows with many grouped together in pairs or a sequence of three openings. Most of these windows have either arched or rectilinear openings. All intact original windows on the east elevation are double-hung sash wood units with either 10-over-10 or 8-over-8 muntin patterns.

Past cases include: 3rd floor addition (Case #8817), window replacement (Case #9846) and elevator tower addition and window changes (Case #15COA1037).

Conclusions

This project generally meets the design guidelines for Addition and Window. While the new windows and doors will not exactly replicate the windows lost to the construction of the elevator tower, the muntin configuration is similar and compatible with the overall design of the building. The elevator tower addition will not be visible from the street. The new deck will related to the design of the third floor addition and is appropriately scaled to the size of the building. The previous approval included a wood stair and landing for the new tower, but the inclusion of a full 2nd-story deck is an encroachment into the required Private Yard Area. The applicant will need to request a variance from the Board of Zoning Adjustment.

DECISION

On the basis of the information furnished by the applicant, the application for a Certificate of Appropriateness is **approved with conditions**:

Case #: 15COA1144
Page 2 of 7

1. That any exposed wood is painted or finished with an opaque stain.
2. That the new doors for the elevator tower are similar in style, design and function as the existing exterior doors.
3. That the applicant applies for a variance from the Board of Zoning Adjustment for Private Yard encroachment.
4. That the plans are implemented as submitted on July 24, 2015 under Case 15COA1144.

The foregoing information is hereby incorporated in the Certificate of Appropriateness as approved and is binding upon the applicant, his successors, heirs or assigns. This Certificate does not relieve the applicant of responsibility for obtaining the necessary permits and approvals required by other governing agencies or authorities.



Andrea Lauago, Associate Planner

7/30/15

Date

Attached Documents / Information

1. Staff Guideline Checklist

Case #: 15COA1144
Page 3 of 7

ADDITION

Design Guideline Checklist

- + Meets Guidelines
- Does Not Meet Guidelines
- +/- Meets Guidelines with Conditions as Noted
- NA Not Applicable
- NSI Not Sufficient Information

	Guideline	Finding	Comment
A1	Ensure that the design of any new addition is in proportion with the size and scale of the historic building and district.	+	The elevator tower is small in scale relative to the building.
A2	Design any addition so that it is subordinate to the original building. Generally, additions should not exceed half of the original building's total floor area or building footprint.	+	
A3	Generally, additions should be attached to secondary elevations and should be set back from the front façade, so as not to damage or obscure character-defining features.	+	
A4	Use materials that are the same as or subordinate to the primary material of the original building. Wood is subordinate to brick, and brick and stucco are subordinate to stone.	+	The elevator tower will be clad in stucco which is the same material used for a previous addition.
A5	Respect original roof forms when designing an addition. Additions should complement existing forms, not overwhelm them.	+	
A6	Do not undertake any full-floor additions in residential preservation districts (adding an additional full floor on top of a building).	NA	
A7	Generally, the original orientation of a building should not be altered when constructing a new addition. An addition should not turn a secondary façade into primary façade.	NA	
A8	Design any new addition so that the first-floor height is equal to or slightly lower than the original building. The floor-to-floor heights should be equal to or up to 10 percent less than the original building. In no case should the floor heights exceed those of the original building.	NA	
A9	Design additions to have the same relationship of solids (wall surfaces) to voids (window and door openings) as the historic portion.	+	
A10	Design additions so that there are subtle distinguishing characteristics between the historic portion and the new alteration. This may include simplifying details, changing materials, or slightly altering proportion.	+	
A11	Set back additional stories from the historic wall plane of commercial or institutional structures when such an approach is required for a new use. The construction of additional stories should be as inconspicuous as possible and not damage or destroy character-defining features.	+	
A12	Do not design additions to appear older than the original building.	+	

Case #: 15COA1144
Page 4 of 7

A13	Comply with the Kentucky building code in such a way that a historic building's character-defining features are preserved.	+	
A14	Do not radically change or damage a building's character-defining features when adding a new code-required stairway or elevator. Any such addition should be compatible with the materials and scale of the historic structure.	NA	
A15	Install fire escapes only on secondary elevations. Respect the locations of original doors and windows and do not cause undue damage to historic materials. They should preferably be painted to match the color of the wall.	NA	
A16	Do not construct a deck on a front or side façade. Decks should be of wood construction and be either painted or finished with an opaque stain. Use the railing detail developed by the Landmarks Commission or other approved detail.	+/-	See conditions. Wood decks must be painted or finished with an opaque stain.
A17	Design rear decks so that they do not extend beyond the side walls of the house and are not visible from the street.	+	
A18	Wood fire stairs should be painted or stained and should be kept to a minimum functional size.	NA	

WINDOW

Design Guideline Checklist

- + Meets Guidelines
- Does Not Meet Guidelines
- +/- Meets Guidelines with Conditions as Noted
- NA Not Applicable
- NSI Not Sufficient Information

	Guideline	Finding	Comment
W1	Replace severely deteriorated historic windows with new windows that convey the same visual appearance. Replacement windows may either be accurate reproductions using historical, pictorial, and physical documentation or be a new design that is compatible with the historic character of the building and the district. Use of vinyl- and aluminum-clad wood window systems on primary elevations may be permissible if the proportion and detail closely match the original.	NA	
W2	Select windows that match the historic sash dimension, muntin configuration, reveal depths, glass-to-frame ratios, glazing patterns, frame dimensions, trim profiles, and decorative features when repair of original windows is impossible.	+/-	The project calls for a new window, not replacement. The new window will be similar to the existing.
W3	Evaluate the option of using appropriate salvage materials when replacing windows that are deteriorated beyond repair.	NA	
W4	Do not use replacement sash that does not fit historic window openings. Original openings should never be blocked-in to accommodate stock windows	NA	
W5	Do not install contemporary picture, glass block, or jalousie windows in exterior window openings.	+	
W6	Do not install synthetic replacement windows (vinyl, etc.) on primary facades.	+	

Case #: 15COA1144
Page 5 of 7

W7	Install replacement windows that operate in the same way as the original windows - double-hung windows are replaced with double-hung, and casement windows are replaced with casements.	+	
W8	Do not replace multi-pane windows that have true divided lights with thermal glazing windows that have false "snap-in" or applied muntins on primary façade elevations.	NA	
W9	Do not apply reflective or insulating film to window glass.	NA	
W10	Do not use smoked, tinted, low-E, or reflective glass on building facades that can be seen from a public way.	NA	
W11	Use large sheets of clear glass when replacement of storefront display windows is required.	NA	
W12	Do not block-in or back-paint transoms or sidelights.	NA	
W13	Use surviving prototypes to reconstruct missing window elements, such as architraves, hoodmolds, sash, sills, and interior or exterior shutters and blinds. The reconstructed element should be constructed of materials for which there is a historic precedent or a compatible substitute material if that is not possible.	+	Brick will be salvaged during the project to be used around the new windows.
W14	Do not alter the number, size, location, or shape of original windows seen from a public way by making new window openings or permanently blocking existing openings. If windows are no longer needed, they should be shuttered if original shutters exist. If shutters do not exist, a temporary closure should be prepared, leaving the window frame intact.	+	
W15	Locate any new windows openings that may be required for a new use on a façade that cannot be seen from a public way. Newly-installed windows should be compatible with the overall design of the building.	+	
W16	Do not obscure historic window trim with metal or siding material.	NA	
W17	Do not install new floors or dropped ceilings that block the glazed area of historic windows. If such an approach is required, the design should incorporate setbacks that allow the full height of the window to be seen unobstructed.	NA	
W18	Install exterior storm windows that duplicate the shape of the original window. Storm windows should be painted to match the color of the window frame.	NA	
W19	Do not install exterior storm windows or screens that damage or obscure historic windows or frames. Mount storm windows on the blind stop within the window frame. Storm window or screen rails should always match the rails of the windows behind. They should have either wood or narrow, metal frames that are painted to match the color of the building trim.	NA	
W20	Do not install window air conditioning units on a primary façade if installation on a secondary façade can address the same need. If this is not an option, do not alter the window sash to accommodate the air-conditioning unit.	NA	
W21	Install any security bars in such a way that they do not obscure the architectural character of original windows or damage historic fabric. Commercial security grills should retract out of sight during business hours.	NA	
W22	Design awnings to complement existing architectural features. They should not overwhelm the façade.	NA	
W23	Install awnings made of weather-proofed canvas of a traditional form. Fiberglass, metal, plastic, and back-lit awnings that have contemporary shapes are inappropriate and visually intrusive.	NA	
W24	Select an awning color that complements the building, with solid colors and narrow or wide stripes running perpendicular to the building being the preferred patterns.	NA	
W25	Install awnings in a way that does not harm the building. Hardware installation should be limited to that which is required for structural stability and should be driven into mortar joints rather than into masonry.	NA	

Case #: 15COA1144
Page 6 of 7

W26	Attach awnings between the window display area and the signboard or second-floor window sills. Awnings should be attached below the transom line where historic prism glass is present and building scale allows.	NA	
W27	Install awnings so that the valance is no lower than 7' above the sidewalk.	NA	
W28	Repair shutters with in-kind materials. If damage is so extensive that they cannot be repaired, replacement shutters should match the visual appearance of the originals.	NA	
W29	Install shutters only where there is historic evidence for them. Replacement shutters should be or appear to be operable, measure the full height and width of the windows, and be constructed of a historically-appropriate material. Solid shutters are appropriate for the ground floor, and solid or louvered shutters are appropriate for upper floors.	NA	
W30	Mount replacement shutters so that they partially cover the vertical trim of the window frame. This gives shutters the appearance that they are indeed operable, even if in truth they are not. Shutters should not be applied to the masonry or cladding on either side of the window.	NA	
W31	Do not install aluminum or vinyl shutters.	NA	
W32	Photographically document architectural features that are slated for reconstruction prior to the removal of any historic fabric.	NA	

Case #: 15COA1144
Page 7 of 7