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November 5, 2025

VIA EMAIL

The Town of St. James  
c/o Jeff Repp, Town Manager  
4140-A Southport-Supply Road  
St. James, NC 28461  
jrepp@stjames.town

RE: Follow-Up Items from the November 3, 2025,  
Planning Commission Meeting  
Our File 211659-00002

Dear Jeff:

Following the Planning Commission meeting held on November 3, 2025, we write to provide additional comments and clarifications on the points discussed during the meeting on the Initial Conditional Zoning Application ("Initial Zoning Application") and the Conditional Rezoning Application ("Rezoning Application") (collectively the "Applications") submitted by Ward and Smith, P.A. ("Applicant") on behalf of the Town of St. James, Harbor Development Corp., Canal Associates, LLC, and D. R. Development Corporation (collectively, "Owner") on October 20, 2025, as supplemented on October 20, 2025, and November 3, 2025.

First, in response to the Commission's questions regarding proposed Condition Number 22 on Exhibit D – Conditions to Conditional Zoning of the Property (the "Conditions") concerning the proposed Connectivity Ratio, we wish to provide further explanation for the proposed ratio of 0.60 for the Project.

A Connectivity Ratio measures how well a street network is connected by comparing the number of links (street segments) to the number of nodes (intersections and cul-de-sac termini). The requested ratio of 0.60 promotes efficient circulation and enhances community connectivity by encouraging a street design that offers multiple route options for both vehicles and pedestrians. The proposed network disperses traffic and strengthens connections between the residential and commercial areas. In locations constrained by natural features such as wetlands, this ratio supports an intentional and environmentally sensitive layout that allows streets to navigate through these areas responsibly, avoiding unnecessary dead ends or large block patterns.

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Second, the applicant is amenable to revising the following conditions as follows:

- Condition 2: Addition of an additional sentence: Further provided that the CN5 area may be relocated only within the other CN areas or the other MF areas.
- Condition 8: Addition of the following: The side setbacks and minimum building separation described herein shall be measured on an absolute basis to all above ground aspects of the respective structures.
- Condition 12: Strike the clause: "maintain adequate building envelopes and".
- Condition 14: Addition of the following: Notwithstanding the foregoing, the areas of delineated wetlands on the property, expressly excepting any areas subject to approved impacts thereof, shall be left in a materially natural condition, and commercial reasonable effort shall be made to preserve the existing trees in those areas. Furthermore, prior to tree clearing activities on the site, the land owner shall provide notice to the Town Administrator.
- Condition 20.A.: Replace with the following: All shopping center lighting shall initially be LED.
- Condition 20.F.: Addition of the following: All parking lighting within the commercial areas shall use reasonably appropriate shielding to reduce the impact of light on any adjacent residential properties.
- Condition 20: Remove subsections I., J., K., L., M., N., O., P.
- Condition 23: Addition of the following after the last word "maximum": "up to seventy five (75) feet."
- Condition 29: Addition of the following: For avoidance of doubt, this condition provides for allowance of townhome structures including up to seven (7) units in the "R" designated areas.
- Condition 30: Addition of the following: A multi-use path shall be installed and maintained on one side of each of the roads labelled A, B, C, D, and E on the Concept Plan.

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Finally, with respect to the addition of Condition Number 31 addressing underground fuel tanks, we propose the following language for inclusion in the final Conditions:

Condition 31 – Underground Fuel Tanks. Within the CN1, CN2, CN3, CN4, and CN5 areas shown on the Concept Plan, no underground fuel storage tanks of the type used in connection with the sale of fuel shall be permitted. Any fuel storage associated with permitted uses in those areas shall be located above ground. This limitation shall not apply to utilities fuel storage for use on the subject site similar to propane used for heat, cooking, or other direct to the property uses, provided such installations comply with all applicable building, fire, and environmental codes.

Please do not hesitate to reach out with any questions.

Yours truly,



Samuel B. Franck