City of Alexandria, Virginia

MEMORANDUM

DATE: SEPTEMBER 3, 2025

TO: CHAIR AND MEMBERS OF THE

BOARD OF ARCHITECTURAL REVIEW

FROM: HISTORIC PRESERVATION STAFF

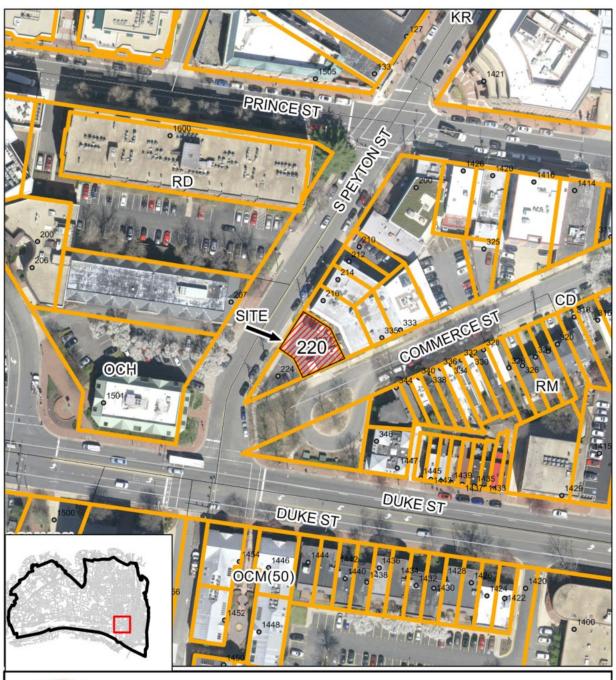
SUBJECT: CONCEPT REVIEW OF 220 SOUTH PEYTON STREET

BAR CASE # 2025-00307

I. SUMMARY

The applicant is requesting BAR Concept Review for the development of the property at 220 South Peyton Street into a multi-unit residential building.

The Concept Review Policy was adopted in May 2001 and amended and restated in 2016 (attached). Concept Review is an optional, informal process at the beginning of a Development Special Use Permit (DSUP) application whereby the BAR provides the applicant, staff, Planning Commission, and City Council with comments relating to the overall appropriateness of a project's height, scale, mass, and general architectural character. These comments are not binding on the BAR or the applicant. The Board takes no formal action at the Concept Review stage but will provide comments and may endorse the direction of a project's design by a straw vote. If the Board believes that a building height or mass, or area proposed for construction is not appropriate and would not be supported in the future, the applicant and staff should be advised as soon as possible. This early step in the development review process is intended to minimize future architectural design conflicts between what is shown to the community and City Council during the DSUP approval and what the Board later finds architecturally appropriate under the criteria in Chapter 10 of the Zoning Ordinance and the BAR's adopted *Design Guidelines*.





160 Feet

II. SITE CONTEXT AND HISTORY

Site Context

The project site is located at the intersection of South Peyton Street and Duke Street on a triangular shaped site created by the converging South Peyton Street and Commerce Street. The south and west elevations will be visible from South Peyton Street as it curves towards Duke Street. The east elevation will be visible from the adjacent Commerce Street. All sides of the building except the attached north side will be visible from a public right of way.

History

The project site was originally occupied during the 1850s. In the early 1920s, a variety of small structures existed on the site including residential and commercial uses. The site is currently occupied by a surface parking lot.

The properties on the south side of Peyton Street are currently occupied by a variety of office buildings that were constructed in the **1980s**. According to the Sanborn Fire Insurance Maps these blocks were dominated by single unit residential buildings from the earliest maps until the construction of the office buildings currently in place.

III. PROPOSED DEVELOPMENT

The applicant is requesting a Concept Review for a proposal to develop the site into a mixed-use building with ground floor commercial space and two floors of residential units above. The proposed building will be a wedge shape following the site configuration with a height that matches the adjacent building to the north and stepped back terraces at the south.

IV. <u>STAFF ANALYSIS</u>

As a reminder, the BAR's purview in this concept review work session is limited to endorsing the project and providing feedback on its height, scale, mass, and general architectural character. The applicant will ultimately return to the Board for approval of a Certificate of Appropriateness for architectural details, finishes, and colors after City Council approval of the DSUP.

The proposed three-story building will have commercial space on the ground floor with two levels of residential units above (Figure 1&2). The height of the building will match the existing building to the north of the project site and step down at the second and third floors towards the south. Each of these steps will create rooftop terraces for two of the residential units. These terraces will be approximately 12'-0" deep and will be enclosed with a metal cable railing. A stepped wood terrace divider centered on the building will provide privacy for the two units on each floor. At the west elevation a projecting bay clad in dark panels is engaged with the adjacent recessed balcony. This feature is centered above the entrance to the ground floor commercial space. On the ground floor of the east side of the building, a two-bay wide recessed area houses the entrance to the residential floors and another entrance to the commercial space. The ground floor exterior wall will consist of storefront separated by grey brick piers and the upper levels will be clad in tan brick with punched windows.



Figure 1: View from South Peyton Street



Figure 2: View from Commerce Street



Figure 3: Building section showing setbacks

V. <u>STAFF RECOMMENDATION</u>

Staff finds that the proposed design is compatible with the standards set forth in the Zoning Ordinance for the historic district. The project site is located at the edge of the historic district and the majority of the surrounding buildings are commercial buildings dating from the 1980s. The proposed height of the building matches the existing adjacent commercial building to the north and the massing steps down towards Duke Street to the south. The overall proportion of the building is horizontal, helping to further diminish the overall impact of the building on nearby structures. Regarding the general architectural character, staff finds the simple combination of materials to be appropriate for this site. Along with the open patio, the ground floor storefront glazing and brick piers help to create a welcoming streetscape and the simple punched windows at the second and third floors denote this as a residential structure similar to others in the historic district. The projecting bay on the west elevation helps to break up the massing and recalls similar details on historic structures.

As the design progresses, the applicant should continue to develop the design with some of the following factors:

- The renderings are unclear regarding a shade structure at the patio on the south end of the site. The applicant should continue to develop details for this structure and include additional information at the Certificate of Appropriateness.
- The projecting bay on the west side of the building effectively breaks up the building massing, the applicant should continue to develop the details of the cladding and how it relates to the nearby balcony.
- The change in brick color at the ground floor helps to give the building a horizontal proportion. The applicant should explore ways to add a third dimension to the brick band in this area, further enlivening the pedestrian experience.
- The detailing and material of the cornice are unclear, the applicant should explore ways in which this can be integrated into the overall design of the building.

Staff recommends that the BAR endorse the proposed design for height, mass, scale, and general architectural character and ask the applicant to continue to develop the details for the design in anticipation of the return to the BAR for a Certificate of Appropriateness.

STAFF

William Conkey, AIA, Historic Preservation Architect Tony LaColla, AICP, Land Use Services Division Chief, Planning & Zoning

VI. CITY DEPARTMENT COMMENTS

Legend: C- code requirement R- recommendation S- suggestion F- finding

Zoning

- C-1 Proposed concept review for new mixed use building will comply with zoning.
- C-2 Plans and design to follow what was approved under CDS2025-00007.

Code Administration

Building permit is required

Transportation and Environmental Services

- F-1 Comply with all requirements of CDSP2025-00007. (T&ES)
- F-2 The Final Site Plan must be approved and released and a copy of that plan must be attached to the demolition permit application. No demolition permit will be issued in advance of the building permit unless the Final Site Plan includes a demolition plan which clearly represents the demolished condition. (T&ES)

Archaeology

- F-1 This property was actively occupied by the mid-twentieth century. Townsend Baggett, a local butcher, and later his heirs, owned the property until the early 20th century. By the 1920s several buildings were standing on the property, a mixture of dwellings and small businesses.
- R-1 Incorporate and interpret elements of the site history and archaeological findings into the design of the public realm with a professional archaeological consultant or qualified historian, in consultation with Staff. The site plan shall indicate themes and locations of interpretive elements such as interpretive signs, markers, specialty paving, historic features, and the like.
 - a. Interpretive Signage

A professional archaeological consultant or qualified historian, in consultation with Staff, shall write text and graphically design interpretive signage using a template provided by the Office of Historic Alexandria. Once approved by the Office of Historic Alexandria/Alexandria Archaeology, install the interpretative signage prior to issuance of the Certificate of Occupancy. Alternatively, the applicant may opt to have Alexandria Archaeology write, design, fabricate, and install the interpretive signage for a one-time fee.

b. Interpretive Elements

A professional landscape architect or designer, in consultation with Staff, shall provide graphics, and descriptions for interpretive elements such as markers, plaques, monuments, inscriptions, specialty paving, specialty railings, historic features, and the like, prior to Final Site Plan release subject to approval by the Office of Historic Alexandria/Alexandria Archaeology and the Director of P&Z. Install the interpretative elements prior to issuance of the Certificate of Occupancy. (P&Z) (Arch)

R-2 Hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. If the study identifies potentially significant resources associated with the property, the consultant shall complete a Resource Management Plan, as outlined in the City of Alexandria Archaeological Standards. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented. The Archaeological Evaluation and implementation of the Resource Management Plan shall be completed prior to submission of the Final Site Plan unless

archaeological work is required in concert with demolition and construction activities, which must be demonstrated to the satisfaction of the City Archaeologist. (Archaeology)

- R-3 The Final Site Plan, Grading Plan, or any other permits involving ground disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) shall not be released until the City archaeologist confirms that all archaeological field work has been completed or that an approved Archaeological Evaluation plan and any required Resource Management Plans will be implemented to recover significant resources before or in concert with construction activities. * (Archaeology)
- R-4 Call Alexandria Archaeology (703/746-4399) two (2) weeks before the starting date of any ground disturbance so that an inspection or monitoring schedule for City archaeologists can be arranged. The language noted above shall be included on all Final Site Plan sheets involving any ground disturbing activities. (Archaeology)
- R-5 Call Alexandria Archaeology immediately (703-746-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts are discovered during development. Work must cease in the area of the discovery until a City archaeologist comes to the site and records the finds. The language noted above shall be included on all Final Site Plan sheets involving any ground disturbing activities. (Archaeology)
- R-6 The applicant/developer shall not allow any metal detection to be conducted on the property, or allow independent parties to collect or excavate artifacts, unless authorized by Alexandria Archaeology. Failure to comply shall result in project delays. The language noted above shall be included on all Final Site Plan sheets involving any ground disturbing activities. (Archaeology)
- R-7 The final Certificate of Occupancy shall not be issued for this property until the final archaeological report has been received and approved by the City Archaeologist.***
 (Archaeology)
- C 1 All required archaeological preservation measures shall be completed in compliance with Section 11-411 of the Zoning Ordinance.

VII. <u>ATTACHMENTS</u>

Application Materials

BAR2025-00307

		BAR C	
ADDRESS OF PROJECT: 220 and	224 S. Peyton	Street	(OFFICE USE ONLY)
DISTRICT: Old & Historic Alexa			100 Year Old Building
TAX MAP AND PARCEL: 073.02 -	·05-12 and	073.02-05-1	3 _{ZONING:} CD
APPLICATION FOR: (Please check all t	that apply)		
■ CERTIFICATE OF APPROPRIATION	TENESS Cond	cept I Review	
PERMIT TO MOVE, REMOVE, E (Required if more than 25 square feet of			
WAIVER OF VISION CLEARANC CLEARANCE AREA (Section 7-80			RD REQUIREMENTS IN A VISION
WAIVER OF ROOFTOP HVAC S (Section 6-403(B)(3), Alexandria 1992 Zo		EQUIREMENT	
Applicant: Property Owner [Name: Windmill Hill LLC	Business (F	Please provide busin	ess name & contact person)
Address:			
City:	State:	Zip:	
Phone:	E-mail :		
Authorized Agent (if applicable):	Attorney	Architect	
Name: Lauren G. Riley			Phone:
E-mail:	-		
Legal Property Owner:			
Name: Windmill Hill LLC			
Address:			
City:	State:	Zip:	
Phone:	E-mail:		

BAR CASE#	BAR2025-00307
•	(OFFICE USE ONLY)

NATURE OF PROPOSED WORK: Please check all that apply

			-1-1-3	
	EW CONSTRUCTION CONTROL CONTRO	ΠΟΝ: <i>Please check all that ap</i> ☐ fence, gate or garden wall ☐ windows	I ☐ HVAC equipment ☐ siding	shutters shed
] lighting] other	pergola/trellis	painting unpainted masonr	У
	DITION			
_	MOLITION/ENCAPSUL GNAGE	LATION		
DESCF be attache		POSED WORK: Please de	escribe the proposed work in det	ail (Additional pages may
The Applicar	nt seeks to construct a new three-s	tory building on a currently vacant triangular sha	aped lot. The building is located at the southwester	n edge of the Old and Historic District.
It is surroun	nded by more contemporary buildi	ngs, the majority of which were constructed in	the 1980s. Most of the nearby buildings are instit	utional in use (schools and religious).
There are r	residential uses along the easte	ern side of Commerce Street, the closest 8	properties constructed in 1949, the following	7 properties constructed in 1978.
The new build	ding will consist of eight rental apartm	nents on the top two floors above a commercial offic	e use on the ground floor. The entry to the apartment u	unit lobby will be along Commerce Street.
The entry to the	he office will be Along South Peyton S	treet. The building will be similar in height to its adjac	cent northern neighbor. The massing will then step down	to the south as it approaches the corner.
There will be	balconies and bays to break up the	overall massing. The building will define the edge	of the urban space and that of the City owned proper	rty at the terminus of Commerce Street.
		k exterior with metal accents (bays		
The win	dows will be storefront a	luminum frames and aluminum fra	med fixed and awning windows on th	ne upper floors.
	ITTAL REQUIREM			
	ck this box if there is the letter approving		on for this property. If so, you	u must attach a
request	additional informati		g materials for BAR applicat w. Please refer to the relevan te treatments.	
materia docketir	I that are necessary ng of the application	to thoroughly describe the for review. Pre-application	application is complete. Inclu project. Incomplete application meetings are required for all o submission of a completed	ons will delay the proposed additions.
			g 25 square feet or more of demo on does not apply to your projec	
	Existing elevation of Clear and labeled pto be demolished. Description of the reference in	photographs of all elevation eason for demolition/encap	elements proposed for demose of the building if the entire sulation.	structure is proposed
	considered feasible		capsulation and why such all	lematives are not

(OFFICE USE ONLY)

Additions & New Construction: Drawings must be to scale and should not exceed 11" x 17" unless approved by staff. Check N/A if an item in this section does not apply to your project.

х	N/A	Scaled survey plat showing dimensions of lot and location of existing building and other structures on the lot, location of proposed structure or addition, dimensions of existing
		structure(s), proposed addition or new construction, and all exterior, ground and roof mounted equipment.
X		FAR & Open Space calculation form. Clear and labeled photographs of the site, surrounding properties and existing structures, if applicable.
X		Existing elevations must be scaled and include dimensions. Proposed elevations must be scaled and include dimensions. Include the relationship to
Х		adjacent structures in plan and elevations. Materials and colors to be used must be specified and delineated on the drawings. Actual samples may be provided or required.
Х		Manufacturer's specifications for materials to include, but not limited to: roofing, siding, windows, doors, lighting, fencing, HVAC equipment and walls.
Х		For development site plan projects, a model showing mass relationships to adjacent properties and structures.
illun	ninate	& Awnings: One sign per building under one square foot does not require BAR approval unless ed. All other signs including window signs require BAR approval. Check N/A if an item in this section does y to your project.
		Linear feet of building: Front:Secondary front (if corner lot): Square feet of existing signs to remain: Photograph of building showing existing conditions. Dimensioned drawings of proposed sign identifying materials, color, lettering style and text. Location of sign (show exact location on building including the height above sidewalk). Means of attachment (drawing or manufacturer's cut sheet of bracket if applicable). Description of lighting (if applicable). Include manufacturer's cut sheet for any new lighting fixtures and information detailing how it will be attached to the building's facade.
Alt	erat	tions: Check N/A if an item in this section does not apply to your project.
	N/A	Clear and labeled photographs of the site, especially the area being impacted by the alterations, all sides of the building and any pertinent details.
		Manufacturer's specifications for materials to include, but not limited to: roofing, siding, windows, doors, lighting, fencing, HVAC equipment and walls.
	_	Drawings accurately representing the changes to the proposed structure, including materials and overall dimensions. Drawings must be to scale.
		An official survey plat showing the proposed locations of HVAC units, fences, and sheds. Historic elevations or photographs should accompany any request to return a structure to an earlier appearance.

BAR CASE#

(OFFICE USE ONLY)

ALL APPLICATIONS: Please read and check the	at you have read and understand the following items:
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х	I understand that after reviewing the proposed alterations, BAR staff will invoice the appropriate filing fee in APEX. The application will not be processed until the fee is paid online.
X	I understand the notice requirements and will return a copy of the three respective notice forms to BAR staff at least five days prior to the hearing. If I am unsure to whom I should send notice I will contact Planning and Zoning staff for assistance in identifying adjacent parcels.
х	I, the applicant, or an authorized representative will be present at the public hearing.
х	I understand that any revisions to this initial application submission (including applications deferred for restudy) must be accompanied by the BAR Supplemental form and revised materials.

The undersigned hereby attests that all of the information herein provided including the site plan, building elevations, prospective drawings of the project, and written descriptive information are true, correct and accurate. The undersigned further understands that, should such information be found incorrect, any action taken by the Board based on such information may be invalidated. The undersigned also hereby grants the City of Alexandria permission to post placard notice as required by Article XI, Division A, Section 11-301(B) of the 1992 Alexandria City Zoning Ordinance, on the property which is the subject of this application. The undersigned also hereby authorizes the City staff and members of the BAR to inspect this site as necessary in the course of research and evaluating the application. The applicant, if other than the property owner, also attests that he/she has obtained permission from the property owner to make this application.

APPLICANT OR AUTHORIZED AGENT

Signature:

Printed Name: Lauren G. Riley

Date: 07/28/2025

Department of Planning and Zoning Floor Area Ratio and Open Space Calculations

A . A1.	Property Info						CD	
	Street Address						Zon	е
A2.	4,381.50 Total Lot Area		X	2.50 Floor Area Ratio A	llowed by Zone	=	10,95 Max	53.75 imum Allowable Floor Area
B.	Existing Gross Existing Gross Basement First Floor Second Floor Third Floor Attic Porches			Allowable Exclusion Basement** Stairways** Mechanical** Attic less than 7'** Porches** Balcony/Deck**	sions**		B1. B2. B3.	0.00 Sq. Ft. Existing Gross Floor Area* 0.00 Sq. Ft. Allowable Floor Exclusions** 0.00 Sq. Ft. Existing Floor Area Minus Exclusions (subtract B2 from B1)
	Balcony/Deck Lavatory***			Lavatory*** Other**			Con	nments for Existing Gross Floor Area
	Other**	0.00		Other**	0.00			
В1.	Total Gross	0.00	B2.	Total Exclusions	0.00			
C.	Proposed Gross Proposed Gross Basement First Floor Second Floor Third Floor Attic Porches	3,476.00 3,225.00 2,620.00		Allowable Exclusion Basement** Stairways** Mechanical** Attic less than 7'** Porches** Balcony/Deck**	543.00		C1. C2.	Proposed Gross Floor Area* 1,043.00 Allowable Floor Exclusions** 8 278.00
	Balcony/Deck			Lavatory***	500.00			
	Lavatory*** Other			Other**				Notes
C1.	Total Gross	9,321.00	C2	. <u>Total Exclusions</u>	1,043.00			*Gross floor area is the sum of <u>all areas</u> <u>under roof of a lot,</u> measured from the face of exterior walls, including basements,
D.	Total Floor A	rea		E. Open Spa	ce			garages, sheds, gazebos, guest buildings and other accessory buildings.
D1.	8,278.00 Total Floor Area	Sq. Ft.		E1. 4,381.50 Existing Ope	Sq. n Space	Ft.		** Refer to the Zoning Ordinance (Section 2-145(B)) and consult with Zoning Staff for information regarding allowable exclusions. Sections may also be required for some
D2.	Total Floor Area by Zone (A2)	Sq. Ft.		Required Operation Required Operation Proposed Operation	Sq.			exclusions. ***Lavatories may be excluded up to a maximum of 50 square feet, per lavatory. The maximum total of excludable area for lavatories shall be no greater than 10% of gross floor area.

The undersigned hereby certifies and attests that, to the best of his/her knowledge, the above computations are true and correct.

OWNERSHIP AND DISCLOSURE STATEMENT

Use additional sheets if necessary

1. Applicant.	State the name,	address and	percent of o	wnership of an	y person or entit	y owning an
interest in the	applicant, unless	the entity is a	a corporation	or partnership	, in which case	identify each
owner of more	than three percent	t. The term ow	nership intere	est shall include	any legal or equi	table interest
held at the time	of the application in	the real proper	rty which is th	ne subject of the	application.	

Address	Percent of Ownership
	see attached
	Address

2. Property. State the name, address and percent	of ownership of any person or ent	ity owning an
interest in the property located at	220 and 224 S. Peyton Street	(address),
unless the entity is a corporation or partnership, in wh	hich case identify each owner of mo	ore than three
percent. The term ownership interest shall include ar	ny legal or equitable interest held at	t the time of the
application in the real property which is the subject of	f the application.	

Name	Address	Percent of Ownership
1. Windmill Hill LLC		see attached
2.		
3.		

3. Business or Financial Relationships. Each person or entity indicated above in sections 1 and 2, with an ownership interest in the applicant or in the subject property are require to disclose **any** business or financial relationship, as defined by Section 11-350 of the Zoning Ordinance, existing at the time of this application, or within the12-month period prior to the submission of this application with any member of the Alexandria City Council, Planning Commission, Board of Zoning Appeals or either Boards of Architectural Review. All fields must be filled out completely. Do not leave blank. (If there are no relationships please indicated each person or entity and "None" in the corresponding fields).

For a list of current council, commission and board members, as well as the definition of business and financial relationship, click here.

Name of person or entity	Relationship as defined by Section 11-350 of the Zoning Ordinance	Member of the Approving Body (i.e. City Council, Planning Commission, etc.)
1. Windmill Hill LLC	see attached	see attached
2.		
3.		

NOTE: Business or financial relationships of the type described in Sec. 11-350 that arise after the filing of this application and before each public hearing must be disclosed prior to the public hearings.

As the applicant or the applicant's authorized agent, I hereby attest to the best of my ability that the information provided above is true and correct.

7/28/2025	James Michael Dameron	
Date	Printed Name	Signature

Windmill Hill LLC 2401 Mt. Vernon Avenue, Unit B Alexandria, Virginia, 22301

Paul Stoddard 301 King Street City Hall, Room 2100 Alexandria, Virginia 22314

Re: Authorization to File Application for a Development Special Use Permit, Certificate of Appropriateness, and Related Requests 220 and 224 S. Peyton Street, Tax Map ID 073.02-05-12 and 073.02-05-13 (the "Property")

Dear Mr. Stoddard:

Windmill Hill LLC, as the owner of the above-referenced Property, hereby authorizes Walsh, Colucci, Lubeley & Walsh, P.C. to act as agent on its behalf for the filing and representation of a Development Special Use Permit, Certificate of Appropriateness, and any related applications or requests for the Property.

Very truly yours,

Windmill Hill LLC

By: James Michael Dameron

Its: Managing Member

Data

BOARD OF ARCHITECTURE REVIEW OHAD- CONCEPT SUBMISSION



VIEW LOOKING NORTHEAST - FROM S PEYTON STREET

NOT TO SCALE



VIEW LOOKING SOUTHWEST - FROM COMMERCE STREET

NOT TO SCALE



VIEW FROM ABOVE - FROM THE CORNER OF S PEYTON STREET AND COMMERCE STREET

NOT TO SCALE



WINDMILL HILL - 220 S PEYTON STREI

STEPHEN WILLIAM KULINSKI
Lic. No. 11046
7 | 28 | 25

PROJECT NUMBER

2520

DATE

07/28/2025

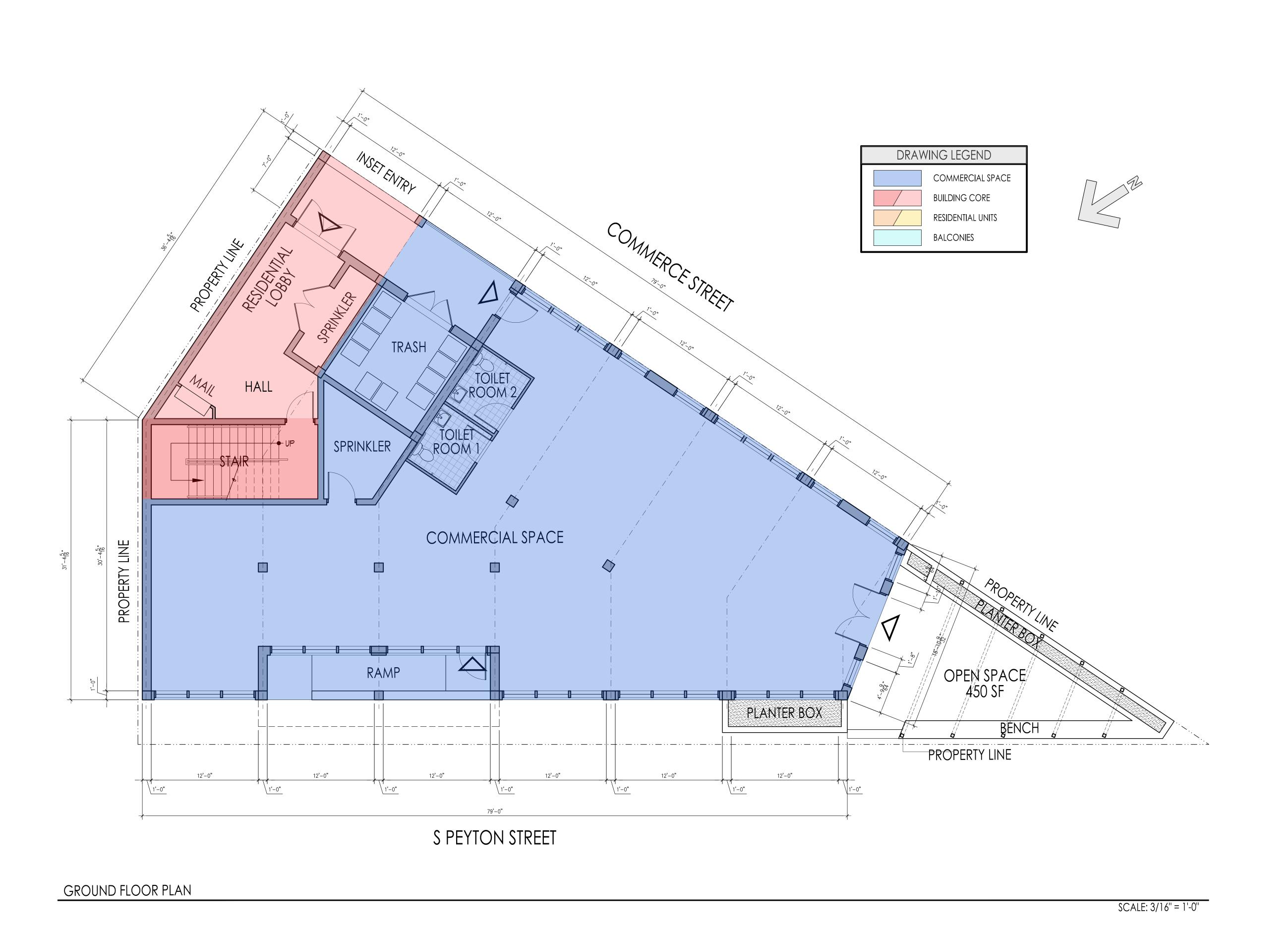
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PROJECT NUMBER

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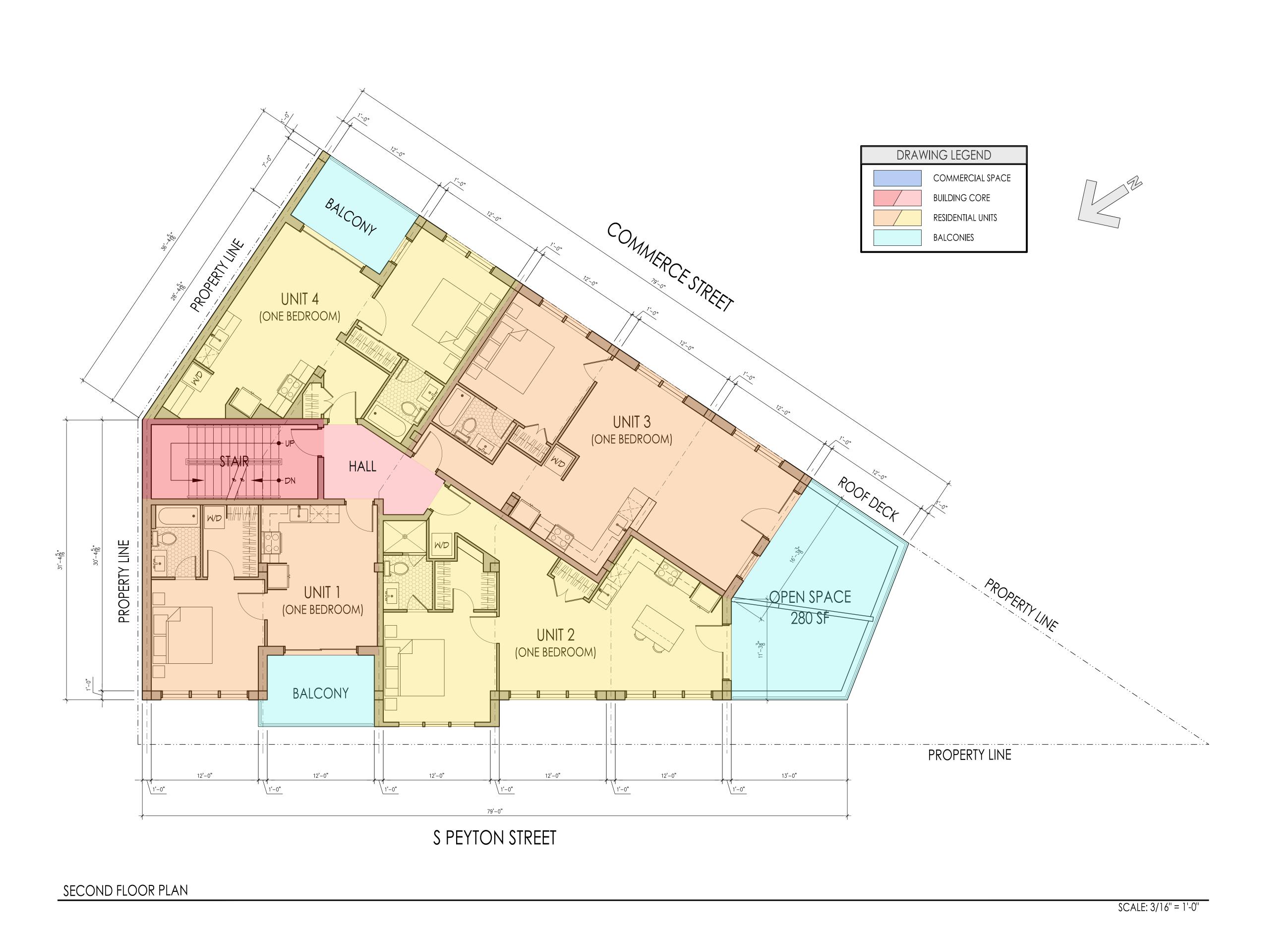
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FLOOR PLAN - RESIDENTIAL / APARTME

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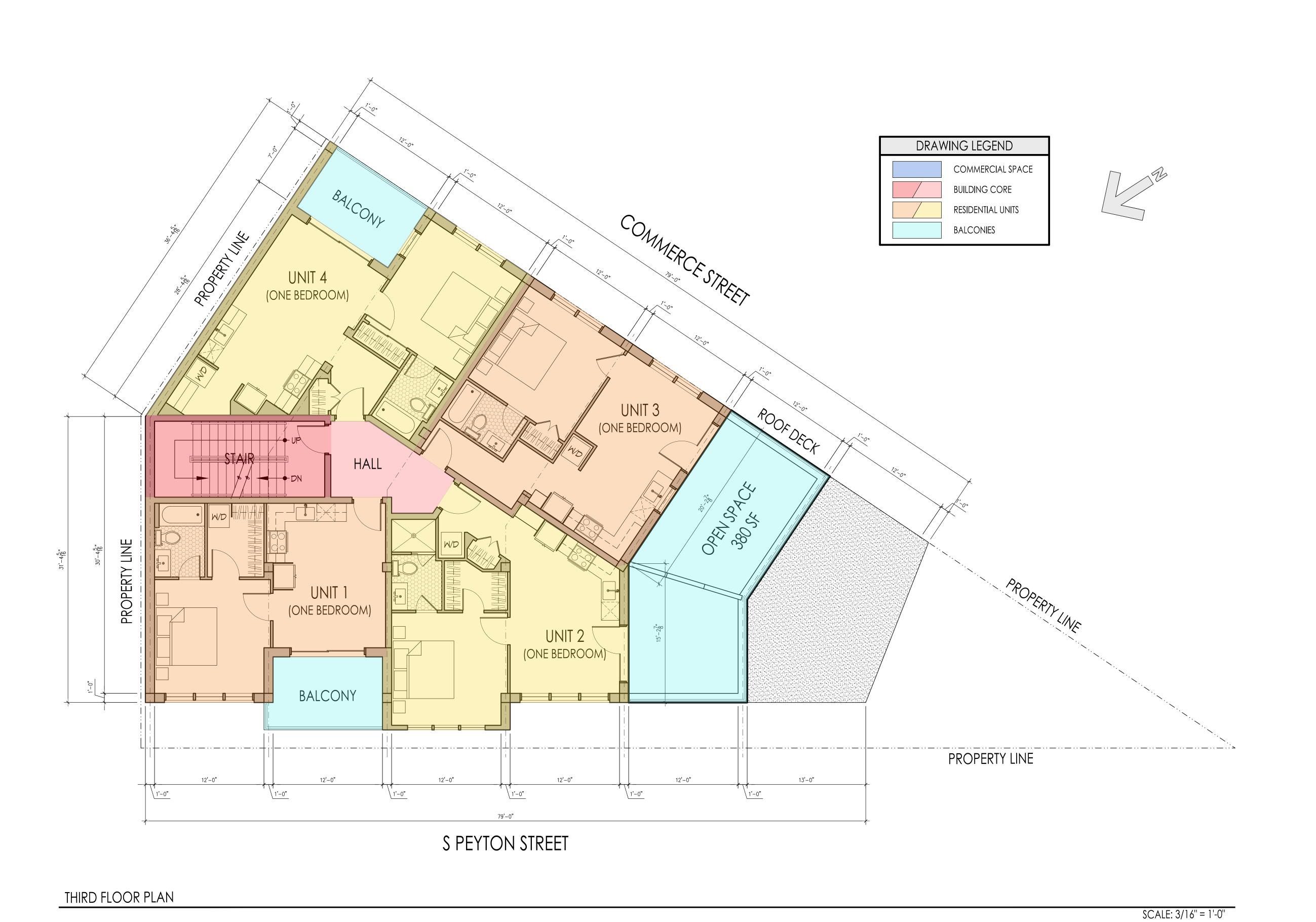
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KGA KGA

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KULINSKIGROUP.COM | 703.836.7243

OR PLAN - RESIDENTIAL / APARTME

STREET

ON STEPHEN WILLIAM KULINSKI Lic. No. 11046
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REVISIONS

PROJECT NUMBER

2520

DATE

07/28/2025

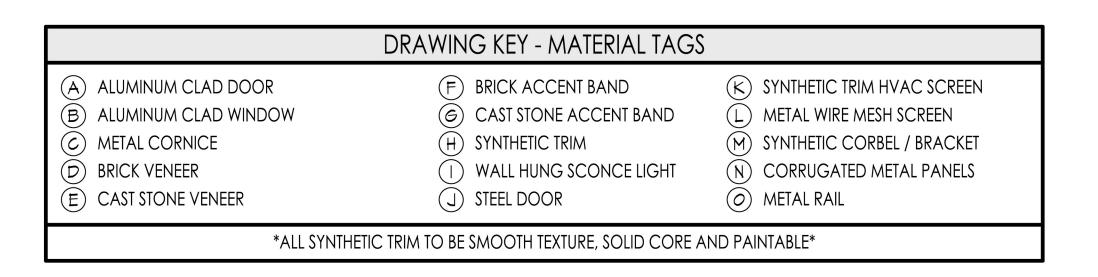
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SHEET NUMBER





FRONT / S PEYTON STREET ELEVATION

SCALE: 3/16" = 1'-0"

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STREET

ELEVATION

STREET

THESE PLANS ARE NOT TO BE RESERVED FOR THE PLANS ARE NOT TO BE RESERV

PROJECT NUMBER

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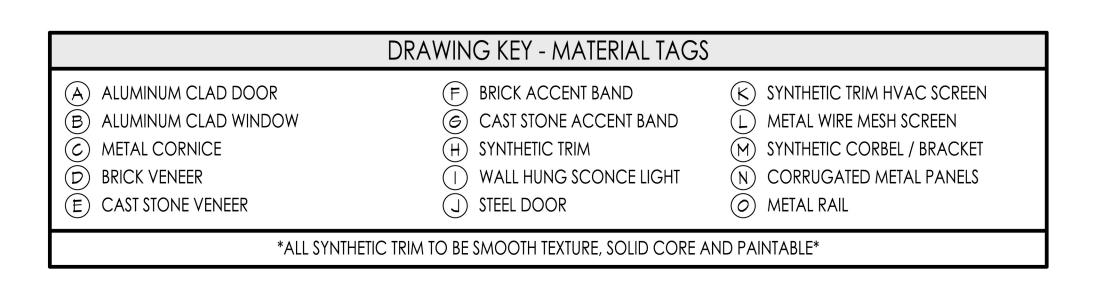
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REAR / COMMERCE STREET ELEVATION

SCALE: 3/16" = 1'-0"

KULINSKIGROUP.COM | 703.836.724

STREET

ELEV,

STREET

WINDMILL HILL 220 S PEYTON STREET ALEXANDRIA, I
REAR / COMMER

20

PROJECT NUMBER

2520

DATE

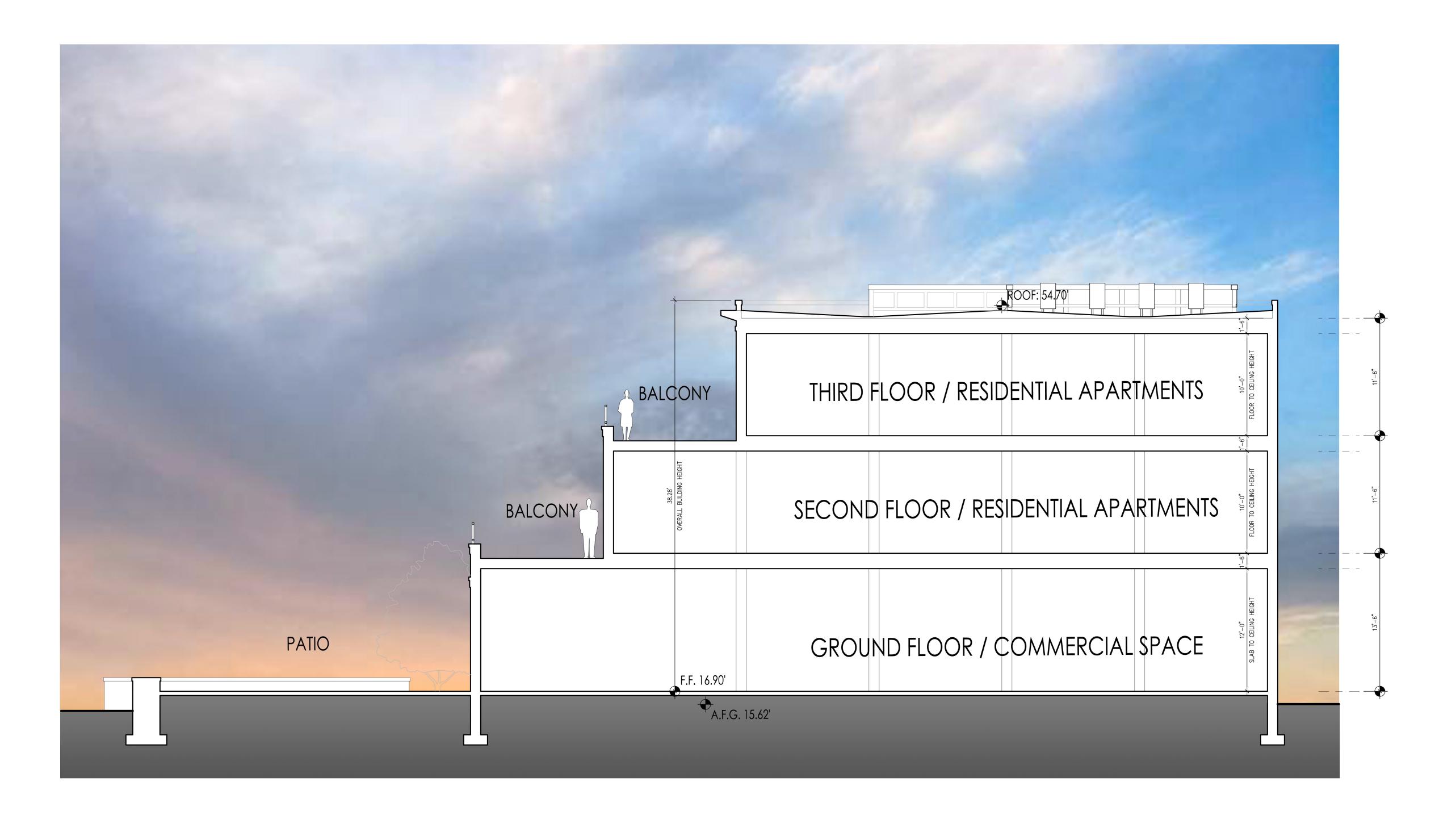
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BUILDING SECTION / BUILDING HEIGHT DIAGRAM

SCALE: 3/16" = 1'-0"

KULINSKIGROUP.COM | 703.836.724

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WINDMILL HIL 220 S PEYTON STREET ALEXA

STEPHEN WILLIAM
KULINSKI
Lic. No. 11046
7 | 28 | 25

PROJECT NUMBER

2520

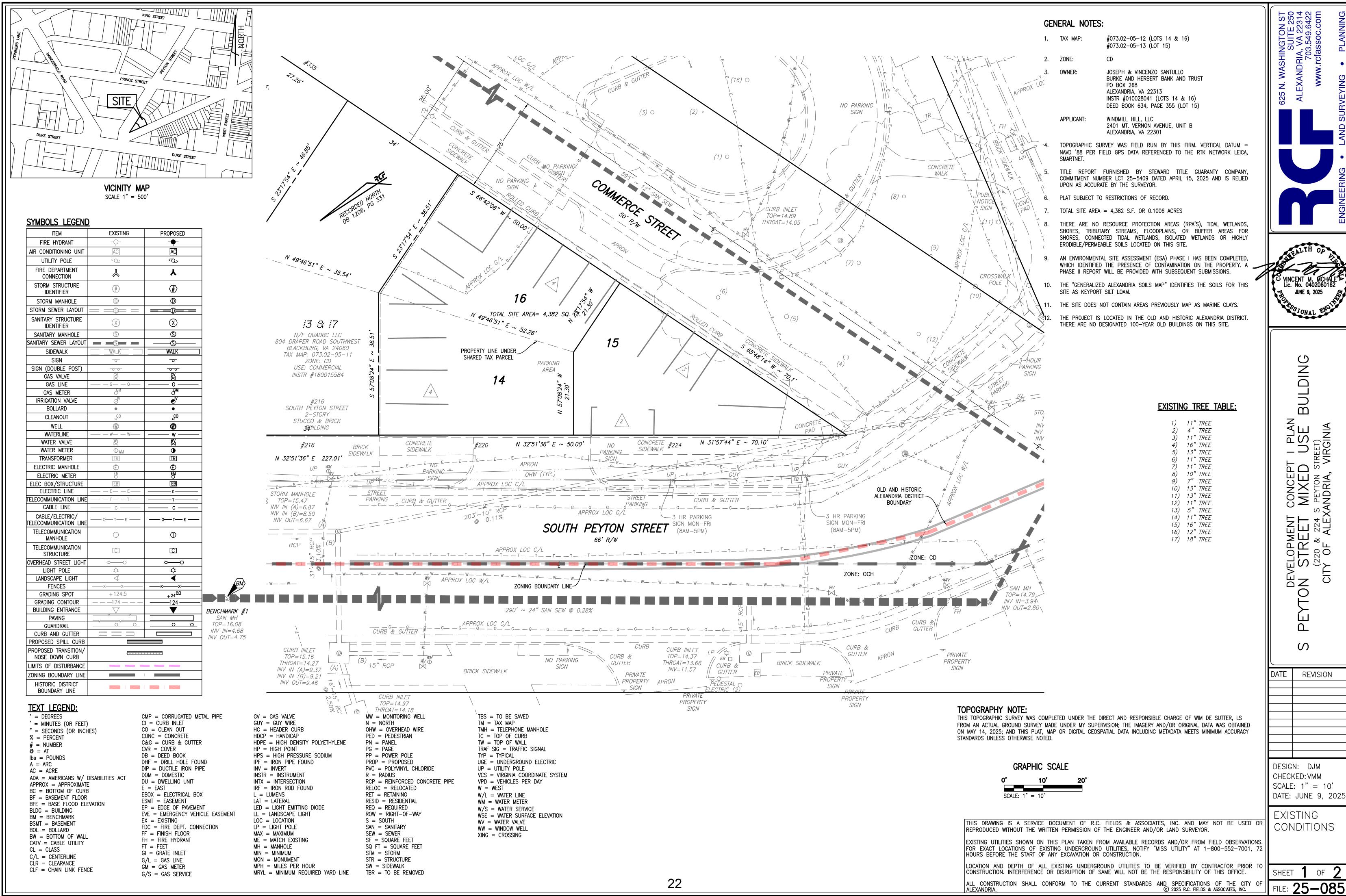
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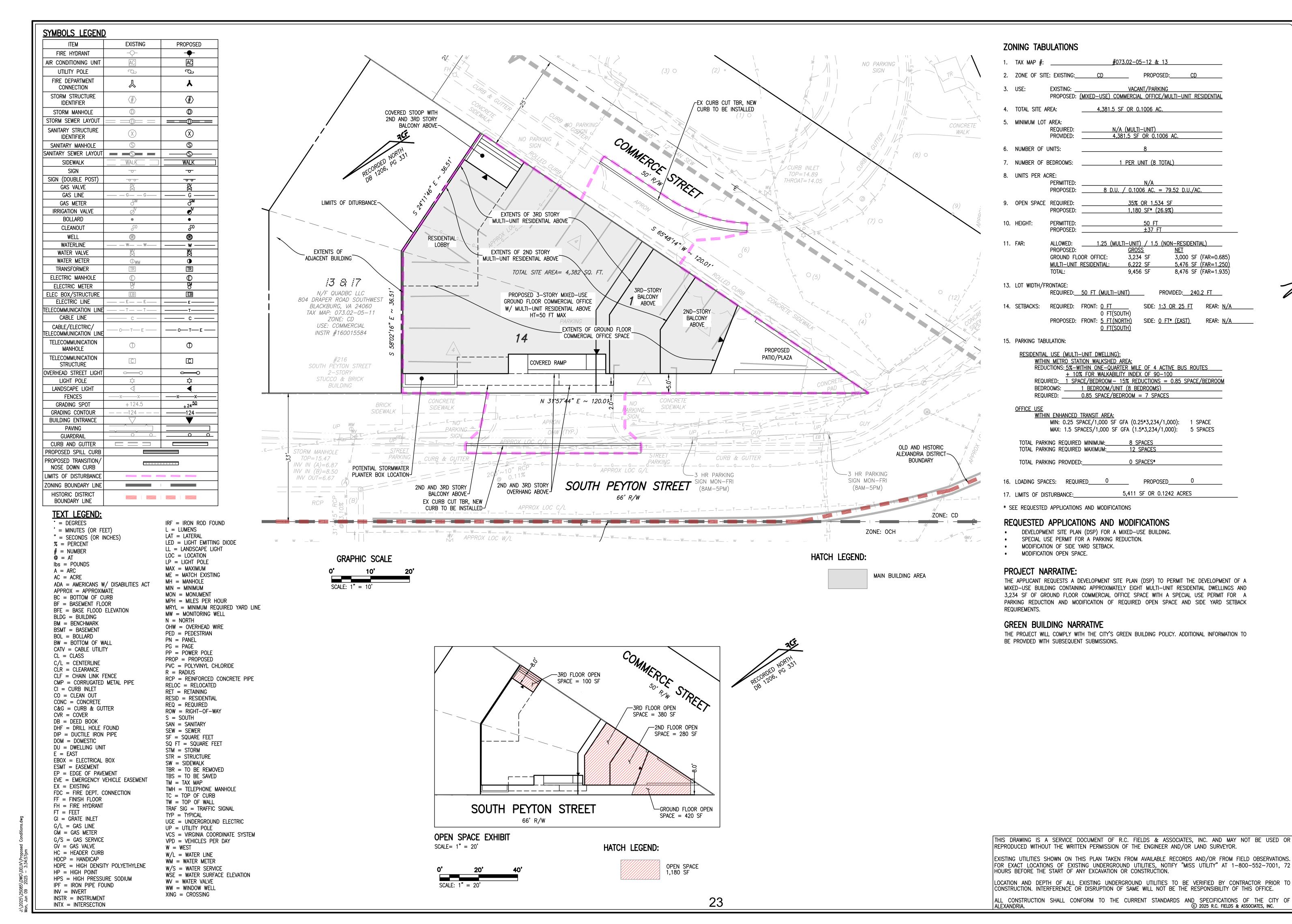
1/8" = 1'-0"

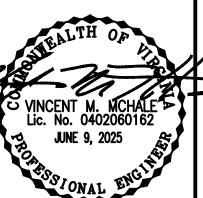
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VINCENT M. MCHALE Lic. No. 0402060162

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DATE | REVISION

DESIGN: DJM

CHECKED: VMM SCALE: AS NOTED DATE: JUNE 9, 2025

CONCEPT

OF