

**From:** [Carl Larsson](#)  
**To:** [Keith R. Thomas](#)  
**Subject:** EPSAC Public Comment on Private Development Environmental Standards  
**Date:** Monday, November 3, 2025 4:41:54 PM

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Dear Keith,

Thank you for the opportunity to speak during the public comment period at the EPSAC meeting last Wednesday. I'm grateful for the opportunity to speak, as well as for the helpful discussion by members of the committee.

As requested by the committee, I finally had an opportunity to type up a summary of my comments and concerns (below). When you have an opportunity, could you please forward this email to the rest of the committee?

I'd also be happy to connect with anyone who's interested in discussing this topic further, and can be reached by email at [ProfCarlLarsson@gmail.com](mailto:ProfCarlLarsson@gmail.com).

Thank you again for everything, and hope you have a great evening!

Best,

Carl Larsson  
487 S Mason St

### **Encouraging Private Sector Environmental Performance Standards - The "Link" Apartments**

This public comment concerns the negative environmental impacts of the proposal to build [the "Link" apartments at 473 S Main St](#) (site of the current Lindsey Funeral Home property, immediately adjacent to City Hall, Build Our Park, and the Farmer's Market). The goal of raising these concerns is to seek ways for our city to work constructively towards ensuring that the developer is committed to meeting or exceeding the environmental standards that we require for our own public buildings in the City of Harrisonburg.

The development proposal would bring needed housing to downtown, and its high density in a walkable, downtown area offers environmental and economic benefits. Density alone, however, isn't enough. A large, 265 unit development (with proffers that would allow for up to ~760 bedrooms) must also be designed with many other important considerations in mind (e.g., size and massing relative to its surroundings, impact on the Downtown Historic District, design, affordability, traffic, and downtown parking spillovers, among other issues). Another significant concern is the environmental impact of the proposed development. Some obvious, negative environmental impacts of the proposal include the following:

- **Loss of mature tree canopy**—as noted in the EPSAC July '25 minutes, our citywide canopy already fell 5.5% from 2014–2024 and remains well below the 40% target. The property currently has a number of mature trees, which all appear to be slated for removal under the developer's July rezoning application. Newly planted replacement trees would take decades to mature, and in the meantime the city will lose the public benefits of the mature trees (e.g., carbon sequestration, shade/cooling, mitigation of stormwater runoff). Could the developer preserve and build around some of the mature trees, especially with regard to the largest tree at the southwest corner of the property? This would be in the spirit of the Bryant Heights development that is profiled by Biophilic Cities: <https://www.biophiliccities.org/bcfilms>
- **Exacerbated urban heat island effect** - For example, the 5-6 story parking deck is slated to be built immediately adjacent to the planned Build Our Park space. How will this impact the temperatures and overall experience of visitors to the park, especially during hotter summer months when our city hosts summer concerts? How can the developer mitigate these impacts either by preserving existing, mature trees, or allowing additional set-backs from the property line to plant larger species of trees?
- **Increase in impervious surfaces and stormwater run-off.** Current plans show a drastic increase in impervious surfaces spanning the 2.7 acre property. How will this impact stormwater run-off in the area? How will its very close proximity to Black's Run, almost immediately across the street, impact flooding risk for land and neighborhoods further downstream?
- **Minimal commitment to sustainability features:** For example, the developer in its July Planning Commission application only committed to rough-in for solar (but not to install any panels), only 10 EV chargers in a large, 400+ space garage, and interior bike parking far below the potential cap of ~760 bedrooms (90 interior bike parking spots, and only 8 exterior spots).

To proceed, the developer is requesting a rezoning of the property from R-3 to B-1C. It's my understanding that they are currently gathering further input on the project, and it's my hope that they can strengthen the proposal to better serve the common good of our city. **Rezoning is a discretionary privilege that City Council can vote to approve or deny. It is therefore my hope that City Council will only grant rezoning if the project meets the highest standards for commercial real estate development, including in its environmental performance.** For example, could the developer be asked to commit to LEED certification (or equivalent) as part of any rezoning approval?

I understand EPSAC's stated purpose includes encouraging private projects to follow our city's environmental standards, and I wanted to learn more about how that might work in the case of the Link. Would EPSAC perhaps consider drafting a recommendation to Planning Commission and City Council that any rezoning, if approved, be conditioned on legally binding proffers that meet or exceed our municipal environmental standards, and/or that the developer commit to a recognized building standard such as LEED (or equivalent)? While Planning Commission has expertise in land use and zoning, EPSAC's input on environmental impact could be very helpful to them as they consider whether to recommend approval of the rezoning (I also understand from speaking with a former member of Planning Commission that there's a precedent for members of Planning Commission to consult with other city committees on the various impacts of proposed developments). Or are there other avenues that members of EPSAC could follow to pursue the committee's goal of encouraging private

projects to follow our city's environmental performance standards?

The Link is a high-profile project, with the developer claiming that it's the largest investment in the history of Downtown Harrisonburg. The standards our city holds the developer to on this project could end up setting a precedent for other future development in the city. For that reason, I'd be extremely grateful for any input that the committee may have on recommending high standards for both this project, as well as others that may follow in the future.