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November 16, 2018

Via Electronic Mail: mark.olinger@richmondgov.com:

Members of City of Richmond Planning Commission
c/o Mark A. Olinger, Director
Dept. of Planning & Development Review
City of Richmond
900 E. Broad Street, Room 511
Richmond, VA 23219

**Re: Rezoning of Monroe Ward – Historic Richmond Comments to
October 2018 Re-proposal**

Ladies and Gentlemen:

Historic Richmond is following up on our August 22, 2017 comment letter to provide additional comments relating to the rezoning of Monroe Ward, as re-proposed in October 2018.

As we noted in our August 2017 letter, we are pleased to see the City of Richmond engage in master planning and rezoning for Monroe Ward to facilitate revitalization. We are pleased to see that the City has given additional thought to Monroe Ward and has introduced several new papers (Resolution Numbers 2018-084, 2018-085, 2018-086, 2018-087) relating to the rezoning since receiving comments in 2017.

Historic Richmond supports the revitalization of Monroe Ward through a combination of infill on vacant lots and the preservation, restoration and adaptive reuse of Monroe Ward's significant existing historic structures. Additionally, Historic Richmond has for decades encouraged and advocated for mixed use development in the neighborhood. However, we believe that the revised proposals do not address the concerns we raised in our August 2017 letter. Accordingly, in order to ensure adequate protections for the existing historic architectural fabric in Monroe Ward, and to encourage appropriate new development, we are providing the following additional comments. We may provide further comments as more information becomes available to us.

In general, we support eliminating the zoning parking requirements for most commercial uses and smaller scale projects, including the Pulse Corridor Plan's Corridor Wide Goals of encouraging underground and wrapped parking decks and encouraging contextual small-scale infill development (though we note that current market forces still demand parking). We look forward to seeing the draft language to incorporate these goals in the zoning ordinance.

For your convenience, we have organized our comments according to the proposed amendments introduced in October 2018:

1. **The City's Proposed Amendment of Official Zoning Map for Rezoning of Certain Properties:** Historic Richmond believes that the important remaining historic resources in Monroe Ward will be placed at significant risk under the B-4 zoning category. Accordingly, we strongly urge that the rezoning be revised as shown on the map attached to this letter as **Exhibit A**, which reflects:

- All parcels currently zoned RO-3 should be rezoned to B-5 (rather than B-4).
- Certain parcels zoned B-3 should be rezoned to B-5 (rather than B-4 or TOD-1).

Historic Richmond supports rezoning this area as B-5 for many reasons, including:

- a. **Historic Preservation is identified in the Pulse Corridor Plan as one of six guiding principles of Transit Oriented Development.** The Pulse Corridor Plan states:

Retaining existing historic buildings is a priority. Smaller historic buildings add to the diversity of style and use along the Corridor.

We as a community should not enact changes to zoning that directly imperil the remaining historic fabric along the Corridor and violate one of the Plan's guiding principles.

- b. **B-5 zoning would better protect Monroe Ward's historic fabric.** All of the parcels identified on the attached map are located within districts listed on the National Register of Historic Places and/or City of Richmond Old & Historic Districts.
 - i. **B-5 height limits are more compatible with Monroe Ward's historic architectural fabric.**
 1. In areas such as those we have noted on the attached **Exhibit A**, where three stories is the average height of the historic fabric, B-5 - with its maximum five story and minimum two-story height restrictions - would be a more appropriate zoning category;
 2. B-4 - with no maximum height limit (today) other than 1:4 vertical plane limit - is not appropriate for these portions of Monroe Ward; and
 3. While B-4 does not currently contain minimum height restrictions, the Pulse Corridor Plan contemplates (despite Historic Richmond's

strong objections) a minimum five story height requirement for this area. As a result, we are assuming that B-4 will require new development to exceed the average height of the historic fabric. (This is crazy!)

ii. **B-5's zoning requirements are more suitable for the look and feel of Monroe Ward's significant historic fabric.**

1. The Pulse Corridor Plan includes a Corridor Wide Goal (CW.5) to encourage contextual small scale infill development. B-5 includes a range of mixed-use permitted principal and accessory uses.
2. In fact, B-5's permitted uses are largely similar to B-4's uses (including nearly identical parking requirements).
3. However, Yard requirements for B-4 are intended for large-scale development, and permit vehicular drop-off or pick-up areas, which is not only inconsistent with the historic fabric but also inconsistent with the Plan of Development overlay goals discussed below.

iii. **Variation in heights can be accommodated with B-5 zoning and case-by-case special use permits.** Construction technology generally dictates that different methods be used for buildings higher than five stories. Those developments that are sophisticated enough to contemplate the expense and design challenges of buildings higher than five stories merit the case-by-case analysis of an SUP in the limited area we have identified.

c. **Richmond cannot afford to lose Monroe Ward's remaining historic fabric, which is some of Richmond's best.** The area designated on Exhibit A to be rezoned as B-5 contains intact historic resources of significant value. Moreover, the streetscape of Franklin Street is largely intact for the entire corridor, meaning any new development along this corridor merits scrutiny for compatibility with this valuable historic fabric. Not only are the historic resources in the limited area we identified listed on the National Register of Historic Places, they were some of the earliest districts listed, further underscoring their importance. For more information on some of the many important historic resources in this area, please see Exhibit B attached to this letter.

d. **Despite possessing some of Richmond's best historic architectural fabric, only a portion of Monroe Ward has any historic protections.**

- i. City Old & Historic Districts are Richmond's designated overlay zoning districts created by City Council to recognize and protect Richmond's historic, architectural, cultural and artistic heritage.
- ii. An owner of a property in a City Old & Historic District may not make exterior changes visible from a public right-of-way without first obtaining

a Certificate of Appropriateness from Richmond's Commission of Architectural Review (CAR).

- iii. Owners of properties in City Old & Historic Districts invested in their properties with the expectation that CAR would ensure the architectural integrity of, and compatible development in, their district.
- iv. Significant demolitions have recently occurred in nearby areas without City Old & Historic District protections. These demolitions of rare and valuable historic fabric were encouraged by existing zoning and unfettered by any historic protections. For example, almost an entire block of early, mid- and late 19th century National Register listed buildings was demolished on Cary Street, despite the pleadings of the City Planning Department and a large groundswell of community concern. This will happen to the historic fabric in Monroe Ward too if the City's proposed zoning is enacted.
- e. **City Old & Historic District protections are of limited value when coupled with adverse zoning.** Historic Richmond regularly sees tension between City Old & Historic District regulations and zoning regulations. This proposal would establish a zoning category so dramatically in conflict with City Old & Historic District regulations that – even in City Old & Historic Districts where CAR has oversight authority - it is easy to foresee CAR's decisions regularly overturned in favor of the maximum development allowed by zoning.¹
- f. **Richmond's historic fabric is critical for a thriving city.** Monroe Ward's historic fabric is walkable, bike-friendly, transit accessible and provides fertile ground for the smaller entrepreneurial businesses our City needs to grow and thrive. Walkability raises home and commercial property values and walkable urban places perform better economically.² According to Walk Score®, Monroe Ward is the second most walkable neighborhood in Richmond, with a walkability score of 94. These are the very characteristics that we, as a community, intend to encourage and preserve through the Pulse Corridor Plan. We should be encouraging investment in Richmond's historic resources, rather than encouraging their destruction.
 - i. Historic buildings now provide a home for one of the City's most vibrant restaurant, residential and commercial corridors nearby on Grace Street. The walkable, unique, authentic and largely intact streetscape, as well as the availability of tax incentives, have been drivers for this revitalization.
 - ii. Older and smaller is better. As Jane Jacobs asserts in her influential 1961 book *The Death and Life of Great American Cities*, "Cities need old

¹ Just this summer the Planning Commission and City Council reduced the boundaries of a City Old & Historic District over the opposition of both the City Planning Department and the CAR.

² See <https://www.walkscore.com/professional/research.php>. According to measures created by Walk Score® index, high Character Score areas are more walkable, bike friendly, and transit accessible.

buildings so badly it is probably impossible for vigorous streets and districts to grow without them". She argues for a mix of old and new buildings, as small businesses like neighborhood bars, book and antique stores, and start-ups can flourish in older buildings that offer less expensive spaces. Essentially, Jacobs saw how much value older, smaller buildings can contribute to economic vitality and diversity in neighborhoods. Recent studies have shown the following:

1. Areas with older, smaller, mixed-vintage buildings have had significantly greater increases in property values over the past 12 years, compared to areas with newer, larger buildings.³
2. There are more jobs per commercial square foot in areas composed of older smaller, more age-diverse buildings than in areas with mostly newer, larger buildings.
3. Areas with older, smaller, more age-diverse buildings have more than twice the rate of businesses with women or minority ownership, more jobs and more non-chain establishments than areas with mostly newer, larger buildings.⁴
4. Overall, when planning for successful communities, "A focus on density alone, as recently promulgated by some economists and urban development advocates, obscures the unique and important role that older, smaller buildings play in supporting small businesses and functional, diverse neighborhoods."⁵

2. **The City's Proposed Amendment of Official Zoning Map to add Priority and Street-Oriented Commercial Street Designations:**

Historic Richmond generally agrees that there are a number of streets whose streetscape and pedestrian experience are crucial for the neighborhood. Accordingly, Historic Richmond supports the concept of "Priority Streets" and "Street-Oriented Commercial" Designations.

We would appreciate your providing the draft revisions to the zoning ordinance to reflect that the references to "principal street" will be revised to instead refer to "Priority Street." We would also like to understand how the Plan of Development principles (discussed in #3 below) will impact, or be impacted by, changes to the zoning ordinance to implement the Priority Streets and Street-Oriented Commercial Designations.

³ For example, a recent study from Raleigh shows that between 2000 and 2008, single-family residential properties in three local historic districts increased in value between 84% and 111%, while in the rest of the city their value only increased 49%. Preservation Green Lab, *Older, Smaller, Better. Measuring How the Character of Buildings and Blocks Influences Urban Vitality*, May 2014, <http://forum.savingplaces.org/act/pgl/older-smaller-better>.

⁴ Ibid.

⁵ Michael Powe, Johnathan Mabry, Emily Talen & Dillon Mahmoudhi (2016): Jane Jacobs and the Value of Older, Smaller Buildings, *Journal of the American Planning Association*.

3. **The City's Proposed Amendment of Official Zoning Map to Create a Plan of Development Overlay District:**

Historic Richmond is pleased to see that in response to our August 2017 letter you are proposing a Plan of Development Overlay District as contemplated in the Pulse Corridor Plan. Our understanding was that such an overlay was to apply to the entire Pulse Corridor and do not understand why it was not introduced in connection with the Scott's Addition rezoning.

We would appreciate your providing the draft revisions to the zoning ordinance to incorporate this overlay district so that we may better understand the details and how they will impact proposed development in Monroe Ward - and the rest of the Pulse Corridor.

4. **The City's Proposed Amendment of Official Zoning Ordinance to Remove the Inclined Plane Height Limitation:**

Historic Richmond strongly opposes the removal of the B-4 inclined plane height restriction for the following reasons:

- a. **The inclined plane rule is consistent with the historic development patterns for Monroe Ward.** The City's summary notes that *"Originally intended to ensure that building height has a proportional relation to the street, the inclined plane has the unintended consequence of forcing tall buildings back on the parcel, creating underutilized plazas that detract from the human scale of the sidewalk environment. In Monroe Ward, the inclined plane would lead to designs that would additionally detract from the historic pattern of the neighborhood."* This statement is an assumption without any basis in fact. The historic pattern of the neighborhood was residential, with setbacks from the street. The taller buildings were relatively recent additions and are not in any way consistent with the historic patterns.
- b. **The inclined plane rule provides valuable public benefits.** Building setbacks and step backs encouraged by the inclined plane rule provide fresh air and daylight at street level, skyline views and view corridors from both street level and buildings, and recreational uses such as gardening and outdoor dining at street level and terraces at upper levels. Building setbacks and step backs promote fire safety by spacing buildings and their protruding parts away from each other.
- c. **The removal of the B-4 inclined plane rule will have far-reaching impacts beyond Monroe Ward on every district with B-4 zoning.** This change will directly impact the Fan, where West Grace Street and Broad Street to the West of Belvidere are zoned B-4. This change will impact Jackson Ward, where portions of the neighborhood North of Broad and Marshall Street are zoned B-4. Manchester now has B-4 zoning of historic fabric. In Downtown, the revitalization of the Arts District is directly related to the Broad Street Old & Historic District and the Grace Street National Register District, which feature

one of the finest assemblages of turn of the century commercial buildings in the commonwealth. The removal of the B-4 inclined plane rule may impact many other neighborhoods and districts as the City pursues rezoning of additional Pulse Corridor station areas and City-wide master planning.

- d. **Through this change, unfettered development and the destruction of irreplaceable historic resources is encouraged.** In not so distant decades, the demolition of the historic fabric in the 300 and 100 blocks of West Franklin Street and the construction of three tall buildings prompted community outrage, the listing of the remaining Franklin Street historic resources on the National Register, the creation of City Old & Historic Districts on Franklin Street, and Historic Richmond's investments to save Monroe Ward. We are particularly troubled by the references in the City's Monroe Ward Rezoning Summary (presented to the Planning Commission in October 2018) to building heights along Franklin Street. When these references are coupled with the proposal to rezone Franklin Street to B-4 and remove the B-4 inclined plane height restrictions, we are led to the inevitable conclusion that if this change is implemented it will result in development unfettered by the CAR and City Old & Historic District regulations, demolition of the historic fabric along Franklin Street, and construction of unsympathetic high rise construction next to, across from, and behind any historic fabric that manages to survive despite of the zoning.

Conclusion.

These comments come from an organization with a long history of significant investment in Monroe Ward. For decades, Historic Richmond has encouraged the revitalization of Monroe Ward in hopes of seeing it return to the vibrant residential and commercial neighborhood it was before the introduction of the automobile led to so many demolitions for surface parking lots. Historic Richmond revitalized the 200 block of West Franklin Street in the late 1970s, saving a block and a half of historic buildings from demolition. In the 1980s, we rehabilitated Linden Row. In the 1990s, Historic Richmond invited the Prince of Wales Trust to generate a master plan for the regeneration of the neighborhood. Several years later, we initiated a "Monroe Ward Planning Initiative" to increase the number of residents in the community, promote mixed use commercial and retail support, build on existing architecturally significant structures, complement and enrich the settings of some of the City's great landmarks, and support the construction of complementary infill development. In the 2000s, in partnership with a private developer, we restored the most architecturally significant structure (the c. 1836 Allen Double House) on the 00 block of East Main Street as a multi-use commercial residential structure, relocating our headquarters to the building and the neighborhood.

Historic Richmond thanks you for the care and attention you devote to matters impacting Richmond and we appreciate your efforts to make Richmond a better place.

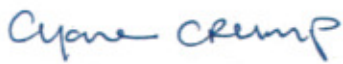
Please do not hesitate to contact us at 804-643-7407 or ccrump@historicrichmond.com with any questions regarding this letter.

Sincerely,

Cyane B. Crump

David I. Meyers

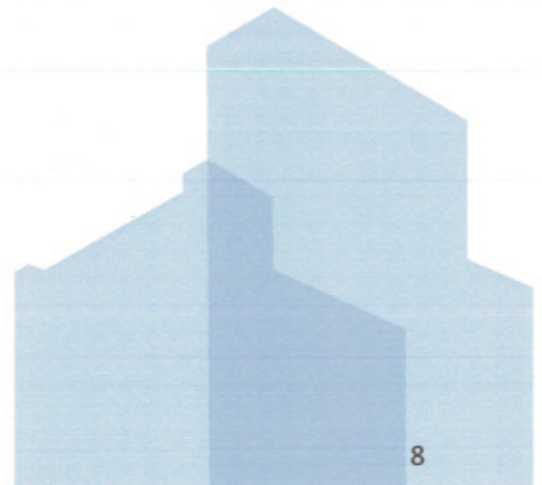
Robert Comet



Executive Director
Historic Richmond

President
Board of Trustees

Member
Monroe Ward Committee



Historic Richmond comments to City's
Proposed Rezoning of Monroe Ward
November 2018

Legend:

- RO-3 to B-5
- B-3 to B-5

EXHIBIT B

1. **Franklin Street** includes an unusually diverse collection of 19th century architecture, including some of the most impressive Romanesque and Neoclassical structures in the City. Here are just a few of the important structures:

- a. 100-114 E. Franklin Street / Linden Row (1847 and 1853) (immediately adjacent to rezoning area)
- b. 12 E. Franklin Street / Kent-Valentine House (1845)
- c. 9 W. Franklin Street / Second Baptist Church (1904)
- d. 101 W. Franklin Street / The Jefferson Hotel (1895)
- e. 204 W. Franklin Street / Cole Digges House (c. 1805)
- f. 205 W. Franklin Street / Mayo-Carter House (1895)
- g. 207 W. Franklin Street / T. Seddon Bruce House (1885)
- h. 212 W. Franklin Street / The Price House (c. 1805)
- i. 319-321 W. Franklin Street (1885)
- j. 401 W. Franklin Street / The Commonwealth Club (1891)
- k. 415 W. Franklin Street / Christian House (1886)
- l. 500 W. Franklin Street / Logan House/ Adolph Ostorloh House (1882)

2. Along with Franklin Street, **Main Street** once contained some of the finest residential structures, including:

- a. 100 E. Main Street / Crozet House (1814) (immediately adjacent to rezoning area)
- b. 4-6 E. Main Street / Allen Double House (1836)
- c. 1 W. Main Street / Ellen Glasgow House (1841)
- d. 212-220 W. Main Street / Queen Anne Row (1891)

3. Several blocks of **Cary Street** are largely intact, provide excellent examples of the historic scale and setbacks of the neighborhood and retain much of their significant 19th century historic structures.

- a. 105 E. Cary Street / McConnell-Gillette House (c. 1854)
- b. 107 E. Cary Street / Charles Howell House (c. 1853)
- c. 109 E. Cary Street / Dietz Printing Company (c. 1923)
- d. 110 E. Cary Street / David H. Berry House (c. 1859)
- e. 117 E. Cary Street / Felix Ferguson House (c. 1842)