

Anne –

Thank you for providing additional information on the inclined plane and TOD 1/B-5 analysis. We appreciate the thought that has gone into the proposed rezoning of Broad Street between Arthur Ashe Boulevard and Belvidere Streets. We have reviewed the November 26, 2019 Museum/Allison/VCU&VUU Station Area Rezoning Summary and attended one of the public comment meetings to learn more. We have the following preliminary thoughts and comments. We may have additional thoughts and comments once we have seen the proposed draft ordinances relating to this rezoning.

- We note that the area covered by the rezoning includes a number of properties and districts listed on the National Register of Historic Places, meaning these buildings, sites and districts are significant on a national level, such as:
 - Broad Street Station (the Science Museum);
 - The William Byrd Hotel;
 - The West Broad Street Industrial and Commercial District;
 - The E.M. Todd Company;
 - Southern Stove Works;
 - The West Broad Street Commercial District;
 - The Maggie L Walker Governors School;
 - The Carver Industrial District;
 - The Carver Residential District;
 - The West Franklin Street District; and
 - The Broad Street Commercial District.

The rezoning area also abuts (across an alley) the Fan District, another National Register listed district, which is also a City of Richmond Old & Historic District.

Historic Preservation is one of the six guiding principles of the Pulse Corridor Plan and retaining existing historic buildings is identified as a priority. The Pulse Corridor Plan further states that “smaller historic buildings add to the diversity of style and use along the Corridor and provide opportunities for business creation. They also provide a strong link to Richmond’s history.” This statement is supported by national studies such as those we cited in our Monroe Ward rezoning comment letters.

The historic districts in this area include distinctive historic character and important historic resources that should be protected and promoted as focal points and anchors for future development. Many of these structures, in a variety of architectural styles and generally ranging from one to three stories in height, were associated with Richmond’s commercial and industrial development in the early decades of the 20th century, residential development in the mid- to late- 19th century, and African American community and civic institutions. Architectural styles range from the grandly scaled, serene classicism of Broad Street Station, to traditional forms and restrained ornamentation of working class Carver row houses to the Art Deco styling of the New Deal era Maggie L Walker Governor’s School, to Broad Street’s largely intact commercial streetscapes, to Gothic Revival, Second Empire, Queen Anne, Romanesque, Colonial Revival, Italian Renaissance, and modernist buildings

- While we are generally supportive of the rezoning approach reflected in these proposals, we would like to see additional protections for Richmond’s historic fabric. In this regard, we note that the National Register districts provide tax incentives for redevelopment of this historic

fabric (and note that many property owners are employing these incentives), but that incentives are not available for all of the important historic fabric. More importantly, there are no demolition protections for any of this historic fabric. We would like to see the Planning Department take steps to implement the stated Pulse Corridor Plan guiding principle of historic preservation (and Recommendation CW.28 to preserve historic structures) and enact meaningful protections against demolition of Richmond's valuable historic fabric.

- The Pulse Corridor Plan specifically prioritized preservation of historic building stock and adequate buffers for residential neighborhoods. In addition, the Pulse Corridor Plan incorporated specific language relating to building heights, 20' rear yard set backs, and massing strategies such as stepping back upper stories along the South side of Broad Street. When the ordinances for this rezoning are prepared, we would like to see that these provisions are specifically and explicitly included. Further, we believe it important that these provisions remain in any future rezoning or rewriting of the zoning ordinance in connection with or following the Richmond 300 Master Planning process.
- Community engagement and consistency between the various planning processes is extremely important. In that regard, we note that the future land use for the Redskins Training Facility/Science Museum/DMV Complex is shown as public "Open Space" and "Institutional" use in the Pulse Corridor's Future Land Use Map as well as in the draft Richmond 300 future land use maps, while this proposal shows this land remaining as a B-4 zoning district. We are concerned that this proposed zoning does not reflect future land use as expressed in multiple planning processes and may result in development that reduces the already limited public open space available in the city.

Please let me know if you have any questions about these comments on the proposed rezoning. Thank you for your consideration.

Cyane



Cyane Crump
Executive Director

Historic Richmond

Building on history

4 East Main St., Suite 1C

Richmond, Virginia 23219

tel: 804.643.7407

fax: 804.788.4244

ccrump@historichrichmond.com

HistoricRichmond.com