

From: [Sarah Driggs](#)
To: [Darby, Anne W. - PDR](#)
Subject: Monroe Ward
Date: Sunday, November 18, 2018 11:30:07 PM

Dear Ms. Darby,

I'm an architectural historian who has lived and worked in Richmond for forty years. I've been chair of the UDC and am currently serving on the Public Art Commission. I'm writing to ask you to listen carefully please to the historic preservation community's thoughts on the proposal to change the zoning of Monroe Ward to B-4. You have the honor of working in PDR at a time when the city could experience unprecedented growth, and with that comes great responsibility. You can drive the city to polish our current reputation of an up-and-coming place to live, work and visit, with walkable streets and neighborhoods with a variety of businesses and uses. We live at a time when smart cities are appreciated and urbanism understands and celebrates human scale development, and you can help Richmond reflect that.

One of the main messages you've gotten from public meetings is that people come to Richmond because of the historic neighborhoods. They respect and want to protect our streetscape. That is in fact one of the guiding principles of the Pulse Corridor Plan, and yet this specific proposal works at cross purposes to those desires. This case very clearly would threaten the very historic structures that the Plan is supposed to enhance.

Downtown business districts are so much more attractive when they are flanked by mixed historic neighborhoods than by a ring of modern commercial structures. How many businesses move downtown because of the availability of an office in a twenty or thirty year old building? But affordable space in a Greek Revival building? That is a draw. Consider Broad Street Village. They built a fake city of 3-5 stories because it's more charming and attractive to people who want to live, work and walk around in the same neighborhood—even if they're in the distant suburbs. Monroe Ward, on the other hand, could be the historic area that provides a foil to a more modern area of taller buildings along the expressway and Belvidere. When the next master plan is written, the buildings that would have been built due to these changes might already be outdated.

The elimination of the inclined plane requirements would also encourage jarring juxtapositions. The Stewart-Lee House looks so awkward and uncomfortable because of its odd placement between a 15-story building and a parking lot. Another large building replacing the parking lot would not make it look any more at ease.

Please reconsider the zoning designation and choose B-5 and retaining the inclined plane requirements. Historic Richmond Foundation's recommendations would be far

preferable to those being considered. These decisions would encourage and allow development at a scale that would improve and complement the current fabric of the neighborhood. Please don't allow buildings that have contributed to the beauty of our city for well over one hundred years to be threatened by development when healthy and sympathetic development could just as easily be encouraged.

You understand how cities work, and you can apply that to Monroe Ward and see that there are better solutions. Thank you for working to improve the city. I know it's not always easy. But this decision should be. Please look at HRF's proposal.

Thanks,

Sarah Driggs
804-350-0891



GARDEN CLUB
OF VIRGINIA

December 5, 2018

Members of City of Richmond City Planning Commission and Department of Planning & Development
Review

Mark Olinger, Director; Anne Darby, Planner
City of Richmond
900 E Broad Street, Suite 511
Richmond, VA 23219

Re: Rezoning Monroe Ward - Pulse Corridor Plan

Ladies and Gentlemen:

The Garden Club of Virginia has been a quiet presence on Franklin Street since the early 1970's when we purchased the Kent-Valentine House on the corner of Franklin and First Street for our state headquarters. During a time when Franklin Street and Monroe Ward structures were being lost to demolition, the KVH was being preserved. It had been placed on the Virginia Landmarks Registry, the National Registry of Historic Places and was already under the terms of an historic easement, one of the first in the city.

Mr. Granville Gray Valentine, Jr. was quoted in the Richmond News Leader upon news of the sale: "It represents the combined efforts of the buyer, seller, and the intermediary, the Virginia Landmark Commission, exerted over a period of several years to achieve a goal - the preservation of an architecturally significant and pleasant house situated in an area of the city where land values would dictate the demolition of the house and construction of a high-rise structure in its place".

As an active participant in the revitalization of Monroe Ward in the 70's, Garden Club of Virginia remains in support of new revitalization of Monroe Ward through a combination of infill on vacant lots as well as the preservation, restoration, and adaptive reuse of existing historic buildings.

The Garden Club of Virginia supports B-5 zoning for building. The Garden Club of Virginia also supports keeping the B-4 inclined plane limitations on building height. We do not support B-4 or TOD-1 as proposed. We ask the City Planners to provide details and an explanation of The Plan of Development Overlay District.

The Garden Club of Virginia joins Historic Richmond Foundation in support of maintaining and protecting the historic environment of Monroe Ward. Progress should not be confused with changing the character and fabric of a section of the city.

Sincerely,

Jean E.R. Gilpin, President

Janet D. Branch, Chairman, Kent-Valentine House



**HISTORIC
RICHMOND**

4 East Main Street, Suite 1C
Richmond, Virginia 23219

Tel: 804.643.7407
Fax: 804.788.4244

www.HistoricRichmond.com

August 22, 2017

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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: Proposed Rezoning of Monroe Ward

Ladies and Gentlemen:

Historic Richmond for decades 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.

Accordingly, we are pleased to see the City of Richmond engage in master planning and rezoning for Monroe Ward to facilitate that revitalization. However, in order to ensure (1) adequate protections for the existing historic architectural fabric, and (2) appropriate new infill development on vacant lots, we are providing the following preliminary comments. We may provide additional comments as more information becomes available to us.

1. **In order to protect existing architectural, cultural and historic fabric, extend the existing City Old & Historic Districts as shown on the attached map to include:**
 - A. 400 Block of West Franklin Street plus part of the south side of the 300 block
 - B. The parking lot at Foushee and Franklin Street
 - C. Three blocks of Main Street from Adams to 2nd Street
 - D. Three and half blocks of Cary Street from Adams to 2nd Street plus the north side of the street to 3rd Street
 - E. Six blocks of Grace Street from 1st Street to 7th Street

We note that each of these blocks contains intact historic fabric and is proximately located near or contiguous to the previously designated 200 Block of West Franklin Street, 00 Blocks of East and West Franklin Street and several other single-property City of Richmond Old & Historic Districts. These blocks are already designated as National Register Historic Districts and represent the limited remaining historic fabric of the neighborhood.

In addition, the revitalization of many of these blocks has been closely connected to the value and significance of the remaining historic structures. For example, in the six blocks of Grace Street identified above, 36 buildings have been subject to historic rehabilitation tax credit projects.¹ Those buildings now provide a home for one of the City's most vibrant restaurant, residential and commercial corridors.

Studies have shown that 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.² Studies also have shown that 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. And 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.³

According to measures created by Walk Score® index, high Character Score areas are more walkable, bike friendly, and transit accessible. Walkability raises home and commercial property values and walkable urban places perform better economically.⁴ According to Walk Score®, Monroe Ward is the second most walkable neighborhood in Richmond, with a walkability score of 94.

¹ Information derived from the Virginia Department of Historic Resources' Virginia Cultural Resource Information System.

² 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>.

³ Ibid.

⁴ See <https://www.walkscore.com/profiessional/research.php>.

These are the very characteristics that we as a community intend to encourage and preserve through the Pulse Corridor Plan. Now is the time to protect the valuable historic fabric that has so clearly contributed to the walkability, bike friendliness and transit accessibility of Monroe Ward.

2. **Instead of the proposed B-4 zoning, the following blocks should be rezoned B-5:**
 - A. 400 Block of West Franklin Street plus part of the south side of the 300 block
 - B. The parking lot at Foushee and Franklin Street
 - C. Three blocks of Main Street from Adams to 2nd Street
 - D. Three and half blocks of Cary Street from Adams to 2nd Street plus the north side of the street to 3rd Street
 - E. Six blocks of Grace Street from 1st Street to 7th Street
 - F. Four blocks of Franklin Street from Madison to 1st Street (including the 200 Block of West Franklin Street, 00 Blocks of East and West Franklin Street and several other single-property City of Richmond Old & Historic Districts)

In connection with our comments to the Pulse Corridor Master Plan, we noted that the height limits associated with B-4 (with no maximum height limit other than 1:4 vertical plane limit) were not appropriate for portions of Monroe Ward. For this reason, B-5 (with a maximum five (5) story height limit) would be a more appropriate zoning category. In addition, B-5 does not allow some of the inappropriate uses authorized under B-4 (such as adult entertainment establishments). We believe that these height limits and zoning requirements are more suitable for achieving the Pulse Corridor Plan's Corridor Wide Goal (CW.5) to encourage contextual small scale infill development.

3. **Modify the proposed B-4 and/or B-5 zoning to ensure that the Plan of Development overlay included in the Corridor Wide Recommendations (CW.1) is reflected in the zoning ordinance.** For example, while B-4 and B-5 include some form elements, they do not clearly articulate those identified in the Pulse Corridor Plan:

- A. **Hold the Corner** - The B-4 and B-5 requirements do not address the principle that buildings and spaces at intersections should have active ground floors that wrap around the corner and should be modified to require this.
- B. **Entrances face the street** – The B-4 and B-5 requirements do not address the principle that main entrances should face the street and should be modified to require this.
- C. **Appropriate setbacks/stepbacks** – The B-4 and B-5 requirements relating to yards permit limited setbacks of no more than 10 feet. There are no provisions relating to stepbacks other than the height restrictions in B-4 relating to the inclined plan. The zoning requirements of B-4 and B-5 should be modified to provide: (1) that commercial uses are closer to the street while residential uses are setback to foster privacy and to create a semi-public space; and (2) for stepbacks of the upper stories.

- D. **Transparency** – Both B-4 and B-5 require certain building façade fenestration along the “principal street frontage” but B-4 includes too many exceptions to these fenestration requirements. We note that many of these exceptions are perhaps not appropriate for the Monroe Ward neighborhood. This is one of the reasons for recommending B-5 zoning.
 - E. **Façade articulation** – This form element should be incorporated in B-4 and B-5.
 - F. **Screened parking/services** – Both B-4 and B-5 provide for screening of parking and refuse areas, but cross reference 30-660 and 30-712.12. However, 30-712.12 does not require attractive landscaping pushed to the sidewalk and should be modified to require this.
4. **Modify the proposed B-4 zoning and/or B-5 zoning to reduce the Plan of Development requirement to include construction of any new building of greater than 25,000 square feet** (rather than 50,000 square feet) to better ensure that new development adheres to these principles. We note that this is one of the concepts to be included in the rezoning for the Scott’s Addition neighborhood.
5. We generally agree that there are a number of streets whose streetscape and pedestrian experience are crucial for the neighborhood.
- A. Accordingly, in addition to the proposed “Priority Streets,” please include as a “Priority Street” First Street between Cary Street and Grace Street, with the exception of permitting the continued use of existing parking and alley entrances.
 - B. On Cary Street, between Foushee and 1st Streets, one or two entrances should be permitted to the North side of the street at existing curb cuts.

We assume that the references to “principal street” will be revised to instead refer to “Priority Street.” Please also revise the zoning ordinance to require along Priority Streets: (1) fenestration requirement of windows; (2) requirements for parking behind the building; and (3) limiting driveways, loading docks and other services on these street frontages.

6. **Address the Corridor Wide Goal of Thriving and Equitable Development.** We note that the Pulse Corridor Plan’s Corridor Wide Goal (CW.27) contemplates allowing additional height if a certain percentage of the units are affordable. Affordable housing is a critical need throughout the city and the zoning requirements relating to the Affordable Housing Bonus should be reviewed and updated as soon as possible.
7. **Parking:**
- A. We support the Corridor Wide Goal of encouraging underground and wrapped parking decks and support a proposed change to eliminate the parking requirements for commercial uses other than hotels. We look forward to seeing the draft language to incorporate this goal in the zoning ordinance.

- B. We support the Corridor Wide Goal of encouraging contextual small-scale infill development. In this regard, we also support removal of the parking requirement for smaller scale projects and to provide for a diversity of housing choices.

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 me at 804-643-7407 or ccrump@historicrichmond.com with any questions regarding this letter.

Sincerely,



Cyane B. Crump
Executive Director

cc: David I. Meyers, President Historic Richmond Board of Trustees

PEARSALL & PEARSALL

ATTORNEYS AT LAW

THE ELLEN GLASGOW HOUSE
FAX 804/644-4216

P. O. Box 558
RICHMOND, VIRGINIA 23218-0558
pearsallaw@comcast.net

ONE WEST MAIN STREET
804/644-5491

November 9, 2017

Mr. Mark Olinger
Director of Planning and Development Review
City Hall
900 East Broad Street
Richmond, VA 23219

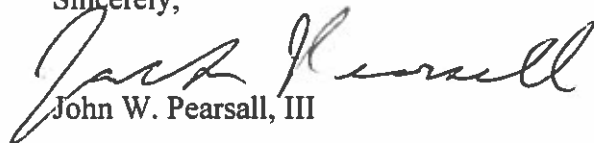
Dear Mark:

After our conversation, it occurs to me that my desire to have vehicular access to Cary Street might be met without thwarting your intention to require buildings along the street. I am proposing residential buildings along Cary between Foushee Street and the Senior Connections building, but expect to need a driveway to get into the center of my half block. Why would it not be possible to require buildings except to allow one driveway per half block?

As I said before, to repopulate Cary Street to its appearance decades ago is quixotic. To try to design areas by fiat instead of form based zoning is unlikely to change economics. Once you have prevented parking lots by B-4 zoning, demand will bring structures, unless they cannot be designed with access.

Please let me know if this might be an approach to the rezoning.

Sincerely,


John W. Pearsall, III

From: [Calder Loth](#)
To: [Olinger, Mark A. - PDR](#); [Darby, Anne W. - PDR](#)
Cc: ccrump@historichrichmond.com
Subject: Monroe Ward Rezoning
Date: Saturday, November 17, 2018 3:25:07 PM

Dear Mr. Olinger and Ms Darby:

The city's pending plan for the revitalization of Monroe Ward is a needed and welcome action for this critical downtown area. Monroe Ward was once a thriving mixed-use neighborhood replete with blocks historic structures. However, over the past sixty years, it has suffered greatly from the lack of oversight and vision either from the city or its property owners. As a result, large portions of Monroe Ward are now scarred. Any urban neighborhood suffers dysfunction with the loss of its critical mass. Monroe Ward's various building clusters, many containing highly significant historic landmarks, are framed by dead-zone surface parking lots. Indeed, guests of a nationally famous hotel step out of its Main Street entrance to be greeted with nowhere.

We are now at a crossroads with establishing incentives for facilitating new infill development. Such new development must be architecturally *compatible* with Monroe Ward's historic resources both in character and function. I am a member of the Historic Richmond Foundation's Advisory Committee and agree with the Foundation's concern for having Monroe Ward's proposed rezoning take into account the following:

1. Monroe Ward's historic fabric must be protected.
2. B-5 (not B-4 or TOD-1) better protects Monroe Ward's historic fabric.
3. Although the Plan of Development Overlay District is a positive inclusion, the details for its requirements and enforcement must be addressed.
4. The B-4 inclined plane limitation on building height should be retained.

Regrettably, many of the new infill buildings in other historic quarters of the city are architecturally vapid. They lack any sense of place and are often out of scale with their neighbors. We must not let this happen in Monroe Ward. Fine-tuning the zoning ordinance can go a long way to avoiding it.

VCU is setting a good example for stressing compatibility rather than blatant contrast with many of its newest buildings, especially its complex east of Belvidere. VCU's projects go through a series of reviews for design quality and compatibility. I represent the Virginia Department of Historic Resources on the Virginia Art and Architectural Review Board. The Board, along with an internal VCU committee reviews all such projects to ensure design quality and compatibility with the neighborhood. This is especially important for a tight urban environment such as Monroe Ward. I firmly believe such oversight and respect for historic fabric can make the regeneration of Monroe Ward a place we can enjoy and be proud of well into the future. A healthy and beautiful (and traditional) mixed-use downtown neighborhood makes a healthy and beautiful city.

Sincerely,

Calder Loth
Richmond



4 East Main Street, Suite 1C
Richmond, Virginia 23219

Tel: 804.643.7407
Fax: 804.788.4244

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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 Mahmoudi (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.

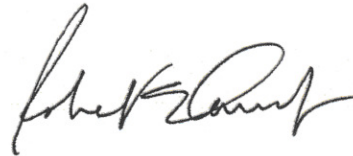
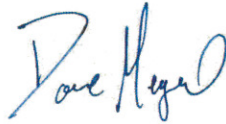
Please do not hesitate to contact us at 804-643-7407 or ccrump@historicrichmond.com with any questions regarding this letter.

Sincerely,

Cyane B. Crump

David I. Meyers

Robert Comet



Executive Director
Historic Richmond

President
Board of Trustees

Member
Monroe Ward Committee

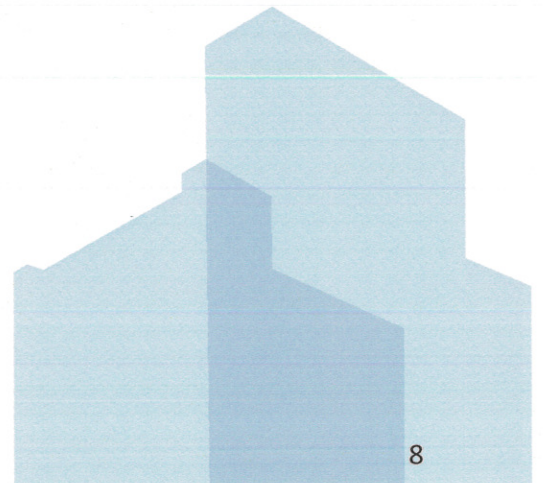


EXHIBIT A

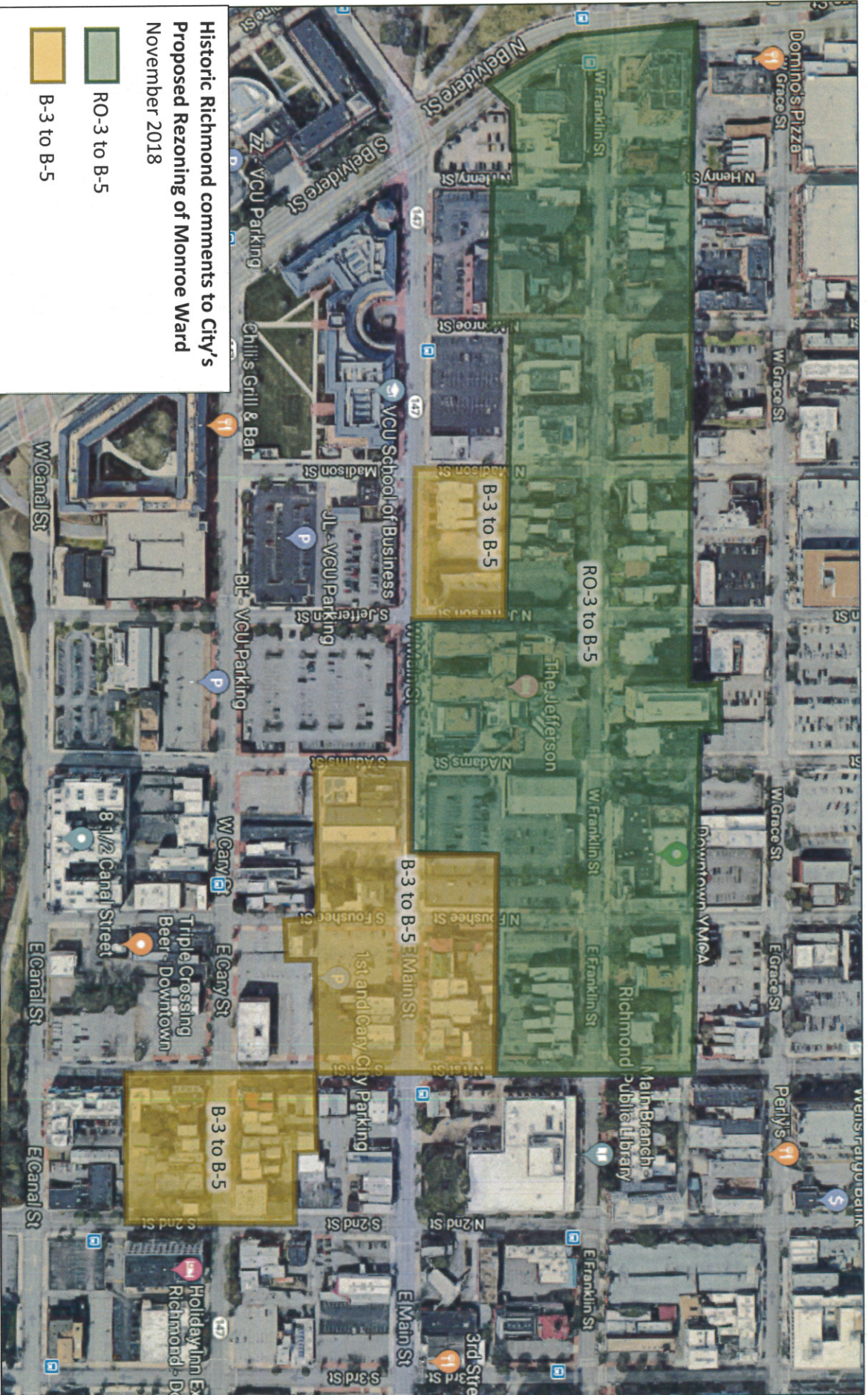


EXHIBIT B

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)



PRESERVATION VIRGINIA

November 28, 2018

Mr. Mark A. Olinger
Director of Planning and Development Review
900 E. Broad Street, Rm 511
Richmond, VA 23219
By Email Mark.Olinger@RichmondGov.com

Re: Rezoning Monroe Ward

Dear Mr. Olinger:

Thank you for holding the City Open House meetings to gather input on rezoning Monroe Ward.

Preservation Virginia strongly supports the revitalization of Monroe Ward to provide mixed-use development through a variety of opportunities to rehabilitate existing structures and in-fill construction on vacant lots. Because of our interest, Preservation Virginia staff attended both the Saturday and Monday sessions.

Preservation Virginia, the nation's oldest statewide non-profit, purchased 204 West Franklin Street as our statewide headquarters in 1995. We have witnessed the resurgence of activity brought about by the rehabilitation and adaptive reuse of buildings on Franklin, Grace and Broad Streets. Investors, residents and business owners recognize the opportunities of retaining the historic character of these streets. Zoning is a powerful tool to encourage compatible future development and sustain the economic viability.

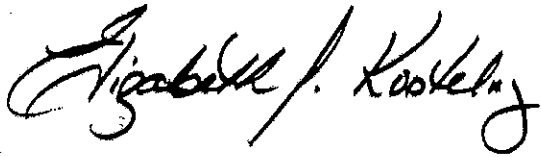
We are encouraged by your statement in Monday's meeting that you would reconsider the Franklin Street corridor. Further, we are pleased by your commitment to develop the guidelines for the Plan of Development Overlay District (POD) before submission of the rezoning plan. Providing details of the POD would go a long way to resolving many of the questions voiced in the meeting. The POD can set expectations for what will be developed in this area in a way that is sensitive to the existing historic fabric while ensuring the vitality of Monroe Ward.

We concur with the comments and suggestions submitted by Historic Richmond on 16 November 2018 made a number of comments. We ask that that you give these comments serious consideration.

PRESERVATION VIRGINIA

Thank you for your leadership in this master planning effort to ensure the future vitality of the City of Richmond.

Sincerely,

A handwritten signature in black ink, reading "Elizabeth S. Kostelny". The signature is fluid and cursive, with the first name "Elizabeth" and last name "Kostelny" clearly legible.

Elizabeth S. Kostelny
Chief Executive Officer

Cc: Anne W. Darby / Anne.Darby@RichmondGov.com

PEARSALL & PEARSALL

ATTORNEYS AT LAW

THE ELLEN GLASGOW HOUSE

FAX 804/644-4216

P. O. Box 558

RICHMOND, VIRGINIA 23218-0558

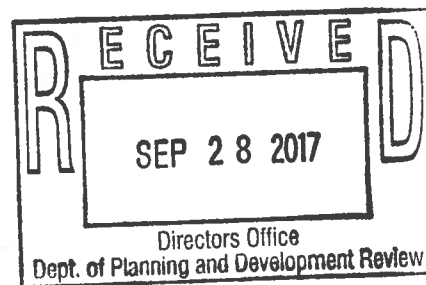
pearsallaw@comcast.net

ONE WEST MAIN STREET

804/644-5491

September 26, 2017

Mr. Mark Olinger
Director of Planning and Development Review
City Hall
900 East Broad Street
Richmond, VA 23219



Dear Mark:

I applaud your rezoning plans for Monroe Ward. I have some objections, however.

I object to designating Cary Street as a "priority street", because that prohibits vehicular access to Cary Street. You are decades late in trying to have only buildings fronting this street. Only two blocks from Belvidere Street to Seventh Street, the 100 block west (Jefferson parking lot) and 100 block east (good historic houses, as you would desire), have no penetrations onto Cary Street. When Cary was written off, as a thoroughfare and service district years ago, the character disappeared.

I own the half block parking lot between Main Street and Cary Street on Foushee Street. I am actively seeking a developer of residential for sale housing. I now have two curb cuts on Cary Street and two on Foushee Street. To design sufficient density of townhouses or condos without access to Cary Street is challenging, if not impossible. Any design would have buildings on Cary Street, but with driveways. I do not object to Main Street being a "priority street" since it is mostly all buildings and achieves the look you appear to want and which I would maintain. But I am seeking to provide the downtown housing that the City wants and would be thwarted by the designation of Cary Street as a "priority street".

The same applies to other parcels owned by clients of mine. The northeast corner of Cary and 6th Streets is an old parking deck. If it were replaced with a new parking deck, there could be no access onto Cary Street, the current and logical entrance.

The southwest corner of Cary and 6th Streets is currently being used by the contractor of the new Dominion building. It is clearly the site for a highrise and has no connection to Monroe Ward. The land sinks steeply to the south along 6th Street and access on Cary Street would be the logical design.

The northwest corner of Cary and 3rd Streets is a parking lot. To be developed into anything without access onto Cary Street would be difficult. Anyway, from that point down to 7th Street, the street dips down and already has none of the character of Monroe Ward. It is part of the highrise, utilitarian downtown district. Why mandating building facades only would alter its character is not apparent.

I am in agreement with some of the suggestions of Historic Richmond Foundation. The southeast corner of Franklin and Foushee Streets should certainly be returned to the historic district from which it was carved. Over strong objections from the CAR and others, the then City Council made a political decision to remove it from a significant Old and Historic District and create donut zoning for an owner, who then never exercised his opportunity to build. There is no good reason to keep this anomaly on a lot that is too small for any but construction compatible with the neighborhood.

The 100 block of East Cary Street is the only intact block of historic buildings on Cary Street.

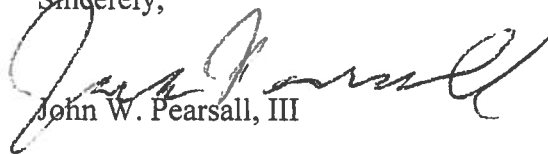
The 400 block of West Franklin Street is all buildings consistent with the historic districts and carrying the historic ambience of Franklin Street on to the west.

The charming eclectic shops on Grace Street from 1st to 7th Streets are architectural textbooks and show the unique remains of Richmond's downtown glory days.

These districts merit historic zoning.

I cannot agree with the HRF suggestion to go from B-3 to B-5 zoning. Excessive height can be regulated by the historic zoning. Nor do I agree that height is necessarily inconsistent with the neighborhood.

Sincerely,



John W. Pearsall, III

Cc: Historic Richmond Foundation

From: [Scott Ukrop](#)
To: [Olinger, Mark A. - PDR](#)
Cc: [Darby, Anne W. - PDR](#)
Subject: Proposed rezoning in Monroe Ward
Date: Friday, November 16, 2018 5:14:25 PM

Mark--

As a member of Historic Richmond's board, please include my name among others with concerns about the proposed rezoning of Monroe Ward. The historic fabric of Monroe Ward contributes to Richmond's unique and distinctive feel, and the historic structures and streetscapes would be at risk with the proposed zoning.

With that in mind, I hope you will consider B-5 (not B-4 or TOD-1) as it better protects Monroe Ward's historic fabric. Also, although I like the idea of a Plan of Development Overlay District, but I am concerned about the lack of details that could allow for misinterpretation by future planning commissions. Finally, I'd like to see the B-4 inclined plane limitation on building height remain in place.

I appreciate all you do on behalf of the City, and I thank you in advance for your consideration.

Scott

Scott Ukrop
Director
[NRV](#) | [@nrvc](#)
rsu@nrvc
804.874.3941

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From: [Jim Ukrop](#)
To: [Darby, Anne W. - PDR](#)
Cc: [Scott Ukrop](#); [Ted Ukrop](#)
Subject: Monroe Ward
Date: Tuesday, November 20, 2018 1:07:52 PM

Anne,

I write in support of Historic Richmond's opposition to the City's proposed changes in zoning in Monroe Ward.

Thanks,
Jim

Jim Ukrop
Co-Founder, Managing Director, [NRV](#)
1801 E. Cary Street, Suite 100
Richmond, VA 23223
Jim@nrv.vc
(804) 327-7520

Asst. Ellen Fleming
(804) 327-7521
Ellen@nrv.vc

Our democracy is in danger. For a quick laugh and a serious message, take a look at this short video and contact your state legislator:

["Meet Jerry Mandering"](#)

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From: [Warthen, Martha](#)
To: [Olinger, Mark A. - PDR](#); [Darby, Anne W. - PDR](#)
Subject: Monroe Ward Rezoning
Date: Tuesday, November 20, 2018 12:27:47 PM

Dear Mr. Olinger & Ms. Darby –

I write to comment on the proposed change in zoning for Monroe Ward to TOD-1 and B-4. Monroe Ward has some of Richmond's best historic fabric, which should be protected and respected, not endangered by zoning classifications that may encourage their destruction. While many of the buildings in Monroe Ward are on the National Register, only a fraction are protected from demolition by an Old and Historic District, and those that are will be at risk from developers who are willing to appeal a CAR decision to City Council. While I agree that zoning changes are in order for the area and I would like to see development on Monroe Ward's many vacant parking lots, I don't think the proposed changes will achieve the Pulse Plan's goal of retaining existing historic structures.

In lieu of TOD-1 and B-4, please consider B-5 zoning for limited areas where there is existing historic fabric (such as Franklin Street and several blocks of Main Street and Cary Street), and where B-4 is utilized, please keep the B-4 inclined plane limitation on building height. B-5 and B-4 with the inclined plane rule will ensure that future structures are built at heights that don't overwhelm the historic fabric or encourage its demolition. In addition, while the idea of a Plan of Development Overlay District has its appeal, I'm concerned with the lack of detail set out in the materials I have seen. My understanding is that the POD Overlay District is meant to give the Planning Department more authority to require changes in proposed plans; however, lack of legal requirements will only give developers greater ability and incentive to appeal any decision.

Please don't let what happened to the 800 block of Cary Street happen to Monroe Ward!

Thank you for your service to the City and for your consideration.

Martha Warthen

Martha A. Warthen
Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
(804) 788-8257
(804) 343-4798 - Fax