From:	Cyane Crump
To:	Ebinger, Matthew J PDR; Jones, Carey L PDR; Jennifer Mullen; Copple, Brian - DPW
Subject:	RE: ORD 2020-100 - Questions about potential impacts on historic granite retaining wall
Date:	Friday, May 1, 2020 5:36:31 PM
Attachments:	image001.png

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Matthew -

Thank you for arranging several calls yesterday in an attempt to answer my questions. As we discussed, I am following up with additional comments for the Planning Commission meeting on Monday.

As I understand it from our conversations, primarily based on information Jennifer and Bryan shared on the call:

- 1. The impact of this ordinance is the demolition of the historic granite retaining wall on the western side of the alley in the City's right of way. Through this ordinance, the developer will be paying for the demolition as part of the alley improvements.
- 2. The City believes demolition is necessary because the Fire Department wanted alley improvements in the Plan of Development for the project.
- 3. Preservation planning staff does not appear to have been involved in the planning process for the historic wall until my questions were raised.
- 4. No alternatives to demolition of this historic resource were considered by the City or the developer.
- 5. Neither the City nor the developer are interested in considering potential ways to mitigate the adverse impact on this historic resource, particularly since the Plan of Development has been completed.

We are particularly concerned about how the City manages its historic resources through the City Planning process. This historic granite retaining wall was specifically included in the National Register District because it was considered a historic resource in the Monroe Ward National Register District, a district in which many historic resources have been demolished. When the City decided that this historic resource was to be demolished, the Plan of Development and Planning process for related ordinances should have included the preservation planners in the process to ensure valuable historic resources are given due consideration and are not irretrievably lost without adequate consideration. The City has several talented preservation planners who can assist with determining whether/how a historic resource will be adversely impacted and how that adverse impact might be mitigated. Their involvement is important no matter the type of historic resources in the infrastructure category – from bridges such as Mayo Bridge, to the canals with their historic locks, sluice gates and stone walls of hewn stone.

I also note that the involvement of City preservation planners is all the more important because, in situations such as this, there is no public notice of the demolition of a historic resource (the papers

here do not even make clear that is what is happening) and therefore no opportunity for the public to weigh in on the significance of a public historic resource.

Thank you for providing my comments for the Planning Commission. Thank you to you and the City staff and the members of the City Planning Commission for your consideration of my comments and for your service to the City. Please let me know if you have any questions.

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@historicrichmond.com HistoricRichmond.com

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From: Cyane Crump
Sent: Tuesday, April 28, 2020 3:40 PM
To: Ebinger, Matthew J. - PDR
Cc: Jennifer Mullen
Subject: ORD 2020-100 - Questions about potential impacts on historic granite retaining wall

Matthew -

I am writing in connection with ORD 2020-100 to close a portion of an alley in the block bounded by East Canal, South Foushee, East Cary and South First Streets in Monroe Ward.

My understanding from a nearby property owner who contacted us is that this alley closure also will involve the demolition of a historic granite retaining wall on the western side of the alley, on the portion of the alley to be retained by the City. We note that this historic granite retaining wall is included within the boundaries of the Monroe Ward National Register Historic District. Indeed the district's boundaries were specifically drawn to include the historic granite retaining wall. While we are working remotely during the Governor's stay at home orders and many historic archives are closed, we have not had the opportunity to thoroughly research this wall's origins, but it appears to date at least to the public works projects of City Engineer Wilfred Emory Cutshaw, who is credited with bringing the "City Beautiful" movement to Richmond with his urban infrastructure and parks projects.

The papers available on the Legistar site for this ordinance do not reference the historic granite retaining wall, so it is unclear to us what the City is planning to do with the wall, whether the wall is expected to be demolished, and whether the City will be demolishing the historic wall or whether the project developer will be demolishing the wall on the City's behalf. We note that the ordinance includes a vague reference to "applicant bears all costs associated with the closing, including, but not limited to, realignment, relocation or removal of utilities or infrastructure, installation of new utilities or infrastructure," which might indicate that the City expects the developer to demolish the wall (infrastructure?) on the City's behalf.

We understand that this paper is scheduled to be on the Planning Commission's Monday May 4 agenda, which will be a virtual meeting. Because the opportunity for public participation in virtual meetings is limited during the pandemic and stay at home orders, and comment must be provided in advance, we wanted to ask a few questions of both the developer and the City:

- 1. What is the impact of the alley closure and this ordinance on the historic granite retaining wall on the western side of the alley?
- 2. If the wall is expected to be demolished, why is demolition necessary?
- 3. Has the City involved the preservation planning staff in its internal review of the project?
- 4. Have alternatives to demolition been investigated and considered?
- 5. If there are no alternatives to demolition of the historic granite retaining wall, can the stones be reused in the new retaining wall? What other alternatives might be available to mitigate such an adverse impact on a historic resource?

Please note that we are generally supportive of the development of the vacant lots on First Street and that this inquiry relates only to the historic granite retaining wall on City property. I left voicemail messages for both you and Jennifer Mullen, who is copied here, earlier today but am following up with this email to make sure I am raising my questions with both of you as soon as possible given everyone's remote work situations.

Thank you in advance for helping to answer our questions. We know that the entire City staff is working very hard in service to our community in these trying times and very much appreciate your hard work.

Stay safe and healthy!

Cyane



Cyane Crump Executive Director

Historic Richmond

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