

April 9, 2021

Danielle Antonacci 508 Arnold Avenue Richmond, VA 23222

Baker Development Resources 1519 Summit Avenue, Suite 102 Richmond, VA 23230 Attn: Mark Baker

To Whom It May Concern:

RE: **BZA 30-2021**

You are hereby notified that the Board of Zoning Appeals will hold an electronic public hearing on Wednesday, May 5, 2021 due to the disaster represented by the spread of COVID-19 pursuant to and in compliance with Ordinance 2020-232 to consider an application for a lot split and building permit to construct a new single-family detached dwelling at 508 ARNOLD AVENUE (Tax Parcel Number N000-1147/020), located in an R-5 (Single-Family Residential) District.

Please be advised that the applicant or applicant's representative is required to participate in the electronic public hearing by calling 804-316-9457 and entering code 741 815 968# beginning at 1:00 p.m. For video access by computer, smart phone or tablet visit https://richmondva.legistar.com/Calendar.aspx.
Select the Board of Zoning Appeals drop-down and 2021 drop-down, click meeting details for May 5, 2021 meeting and then click video access. In the event you have difficulty accessing a public hearing you may contact Mr. William Davidson at 804-396-5350 or by email at William.Davidson@richmondgov.com for assistance. In accordance with Ordinance No. 2020-232, please be advised that an inability to access one of the enumerated public hearing through video means shall not be considered a prerequisite for participating in the subject public hearing. It will be necessary for you to stay on the line until such time as your case is called. The Board of Zoning Appeals Rules of Procedure provides that in the case of an application for a variance or a special exception, the applicant, proponents or persons aggrieved under \\$15.2-2314 of the Code of Virginia, shall be permitted a total of six (6) minutes each to present their case. The Board of Zoning Appeals will withhold questions until the conclusion of the respective presentations. For the purposes of the record it also requested that before addressing the Board you identify yourself and spell your name.

Finally, when you submitted your application to the zoning office you were given an handout entitled, Suggestions for Presenting Your Case to the Board, which indicated that you should discuss your request with your neighbor(s) and neighborhood

BZA 30-2021 Page 2 April 9, 2021

association(s) prior to appearing before the Board of Zoning Appeals. Contact information for civic group(s) can be found by navigating to the Civic Group webpage of the City's website at http://www.richmondgov.com/PlanningAndDevelopmentReview/civicassociationgroupinformation.aspx. Once there, you can search for your property using the interactive map. A dialogue box will provide you with the names of all civic groups within which your property may lie. Once you have those group names, simply scroll down the page to the appropriate group(s) to find the contact information for each. The Board understands that given the current situation it is not practical to conduct face-to-face discussions with either your neighbors or neighborhood association(s) but the Board requests that you make a good faith effort to provide them with relevant information regarding your case.

If you have any questions regarding the Board's procedures or any issue involving presentation of your case, please feel free to contact me.

Very truly yours,

Roy W. Benbow, Secretary Phone: (804) 240-2124 Fax: (804) 646-5789

E-mail: Roy.Benbow@richmondgov.com

Lay w. Lanteer

cc: Zoning Administrator

Notice of this meeting is being sent to the persons whom the Board of Zoning Appeals believes to be property owners in the immediate vicinity of the property concerned in this application. This notice is for their information only, and there is no need for them to appear unless they so desire. The Board will, however, welcome such views as any persons care to express during the hearing on this application.

Abney Nikka L 3112 Richmond Henrico Tpk Richmond, VA 23222 Belle Properties LLC Po Box 4579 Richmond, VA 23220 Costa Christian A And Heyd Rachel 503 Arnold Ave Richmond, VA 23222

Davis Mary M 512 Arnold Ave Richmond, VA 23222 Dobbins Frances C 519 Northside Ave Richmond, VA 23222 Fresh Start Holdings LLC 15430 Pouncey Tract Rd Rockville, VA 23146

Hb 4 Llc 2155 Lanier Lane Space P Rockville, VA 23146 James Nay Llc 710 Nailor Way Midlothian, VA 23114

Johnson Alice S 505 Arnold Ave Richmond, VA 23222

Johnson Kelsey Ann 517 Northside Ave Richmond, VA 23222 Katz Alexander James And Crossley Emily Taylor 504 Arnold Ave Richmond, VA 23222 King Barbara A & Baker Evelyn & Duff Gloria Y 507 Arnold Ave Richmond, VA 23222

Kreyling Anna C/o Peter A Kreyling Po Box 131 Washington, DC 22747 Marcus Joshua Michael And Thoms Paul Richard Christopher 521 Northside Ave Richmond, VA 23222

Nelson Alfred 515 Arnold Ave Richmond, VA 23222

Peyton Vanessa H 3110 Richmond Henrico Tnpk Richmond, VA 23222 Pond Joseph M 507 Northside Ave Richmond, VA 23222 Porr Matthew W 3102 Richmond Henrico Tpke Richmond, VA 23222

Salyards Lindsay A 520 Arnold Ave Richmond, VA 23222 Shiloh Enterprise Properties LLC 3333 W Marshall St Richmond, VA 23230 St John Thomas 511 Arnold Ave Richmond, VA 23222

Thomas Cauble B 510 Arnold Ave Richmond, VA 23222 Thompson Kim 1704 Almond Creek Place Richmond, VA 23231 Walker Oather J Jr 513 Arnold Ave Richmond, VA 23222

White Kayla 516 Arnold Ave Richmond, VA 23222 Wilson Charles And Vansteenburgh Jennifer 513 Northside Ave Richmond, VA 23222

Property: 508 Arnold Ave Parcel ID: N0001147020

Parcel

Street Address: 508 Arnold Ave Richmond, VA 23222-

Owner: ANTONACCI DANIELLE

Mailing Address: 508 ARNOLD AVE, RICHMOND, VA 23222

Subdivision Name: NORTHSIDE PLACE

Parent Parcel ID:

Assessment Area: 314 - Barton Heights Property Class: 120 - R Two Story

Zoning District: R-5 - Residential (Single Family)

Exemption Code: -

-Current Assessment

Effective Date: 01/01/2021 Land Value: \$34,000 Improvement Value: \$184,000

Total Value: \$218,000 Area Tax: \$0

Special Assessment District: None

Land Description

Parcel Square Feet: 7949.55

Acreage: 0.182

Property Description 1: NORTHSIDE PLACE L29-31PT28 B7

Property Description 2: 0075.71X0105.00 0000.000

State Plane Coords(?): X= 11794204.499993 Y= 3734244.274252 Latitude: 37.57369110 , Longitude: -77.42583387

Description

Land Type: Residential Lot A

Topology: Level Front Size: 75 Rear Size: 105

Parcel Square Feet: 7949.55

Acreage: 0.182

Property Description 1: NORTHSIDE PLACE L29-31PT28 B7

Property Description 2: 0075.71X0105.00 0000.000 Subdivision Name: NORTHSIDE PLACE

State Plane Coords(?): X= 11794204.499993 Y= 3734244.274252

Latitude: 37.57369110 , Longitude: -77.42583387

Other

Street improvement: Paved

Sidewalk: Yes

-- Assessments-

Assessment Year	Land Value	Improvement Value	Total Value	Reason
2021	\$34,000	\$184,000	\$218,000	Reassessment
2020	\$34,000	\$162,000	\$196,000	Reassessment
2019	\$25,000	\$214,000	\$239,000	Reassessment
2018	\$25,000	\$71,000	\$96,000	Reassessment
2017	\$25,000	\$71,000	\$96,000	Reassessment
2016	\$25,000	\$69,000	\$94,000	Reassessment
2015	\$25,000	\$68,000	\$93,000	Reassessment
2014	\$25,000	\$68,000	\$93,000	Reassessment
2013	\$25,000	\$68,000	\$93,000	Reassessment
2012	\$25,000	\$68,000	\$93,000	Reassessment
2011	\$25,000	\$75,000	\$100,000	CarryOver
2010	\$25,000	\$75,000	\$100,000	Reassessment
2009	\$25,000	\$93,800	\$118,800	Reassessment
2008	\$25,000	\$85,800	\$110,800	Reassessmen
2007	\$23,000	\$79,400	\$102,400	Reassessment
2006	\$12,500	\$79,400	\$91,900	Reassessmen
2005	\$7,300	\$53,300	\$60,600	Reassessmen
2004	\$6,800	\$49,800	\$56,600	Reassessmen
2003	\$6,700	\$48,800	\$55,500	Reassessmen
2002	\$6,500	\$47,400	\$53,900	Reassessmen
2000	\$6,500	\$47,400	\$53,900	Reassessmen
1998	\$6,500	\$39,500	\$46,000	Not Available

Transfers

Transfer Date	Consideration Amount	Grantor Name	Deed Reference	Verified Market Sale Description
04/29/2019	\$214,000	AVENS OTIS A	ID2019-7915	1 - VALID SALE-Valid, Use in Ratio Analysis
10/31/1995	\$44,000	Not Available	09502-00929	7
08/13/1984	\$0	Not Available	000014-00962	
06/11/1984	\$42,000	Not Available	000007-01765	

-Planning

Master Plan Future Land Use: R

Zoning District: R-5 - Residential (Single Family)

Planning District: North
Traffic Zone: 1019
City Neighborhood Code: HGTR

City Neighborhood Name: Highland Terrace

Civic Code:

Civic Association Name:

Subdivision Name: NORTHSIDE PLACE

City Old and Historic District: National historic District: Neighborhoods in Bloom:

Redevelopment Conservation Area: Northside Area 10

Economic Development

Care Area: Enterprise Zone:

Environment

100 YEAR Flood Plain Flag: Contact the Water Resources Division at 646-7586.

500 YEAR Flood Plain Flag: N

Resource Protection Flag: Contact the Water Resources Division at 646-7586.

Wetland Flag: N

Census

Census Year	Block	Block Group	Tract
2000	3019	0108003	010800
1990	303	0108003	010800

Schools

Elementary School: Stuart

Middle School: Henderson

High School: Marshall

Public Safety

Police Precinct: 4
Police Sector: 411
Fire District: 15
Dispatch Zone: 092A

Public Works Schedules

Street Sweep: TBD
Leaf Collection: TBD
Refuse Collection: Wednesday
Bulk Collection: TBD

Government Districts

Council District: 6
Voter Precinct: 606
State House District: 71
State Senate District: 9
Congressional District: 4

Extension 1 Details

Extension Name: R01 - Residential record #01

Year Built: 1924

Stories: 2 Units: 0

Number Of Rooms: 9

Number Of Bed Rooms: 4

Number Of Full Baths: 1

Number Of Half Baths: 1

Condition: very good for

age

Foundation Type: 1/2 Bsmt, 1/2 Crawl

1st Predominant Exterior: Stucco 2nd Predominant Exterior: N/A

Roof Style: Hip

Roof Material: Metal Interior Wall: Drywall

Floor Finish: Hardwood-std oak

Heating Type: Heat pump

Central Air: Y

Basement Garage Car #: 0

Fireplace: Y

Building Description (Out Building and

Yard Items):

Extension 1 Dimensions

Finished Living Area: 1440 Sqft

Attic: 0 Sqft

Finished Attic: 0 Sqft

Basement: 360 Sqft

Finished Basement: 0 Sqft

Attached Garage: 0 Sqft

Detached Garage: 0 Sqft

Attached Carport: 0 Sqft

Enclosed Porch: 0 Sqft

Open Porch: 176 Sqft

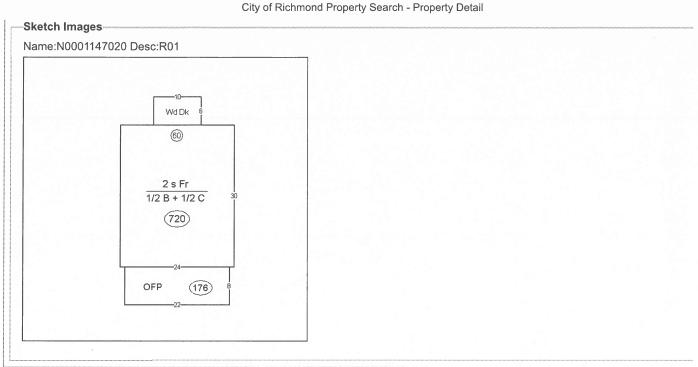
Deck: 60 Sqft

-Property Images

Name:N0001147020 Desc:R01



Click here for Larger Image



RICHMOND BOARD OF ZONING APPEALS APPLICATION FORM



THE RICHMOND ZONING ADMINISTRATION OFFICE ROOM 110, CITY HALL, 900 EAST BROAD STREET RICHMOND, VIRGINIA 23219 (804) 646-6340

TO	BE COMPLETED	BY THE APPLICAN	T
PROPERTY Danielle Antonaci	e PH	ONE: (Home)	(Mabile) ()
OWNER: 508 Arnold Avenu	e FA	X: (Home) ()	(Mobile) ()
(Name/Address) Richmond VA 2	3222	E-mail Address:	
OWNER'S Mark Baker	PI	ONE: (Home) (894) 874	-6275 (Mobile) (804) 822-5428
REPRESENTATIVE Baker Developmen			
(Name/Address) 1519 Summit Ave		The state of the s	
Richmond, VA 23			
TO BE COMP PROPERTY ADDRESS (ES): 508 A		ONING ADMINSTRATIO	
TYPE OF APPLICATION: U	RIANCE [X]	SPECIAL EXCEPTION	OTHER
ZONING ORDINANCE SECTION NUM	BERS(S): <u>Sec 30-300</u>	Sec 30-410.4	
APPLICATION REQUIRED FOR:	hullding permit to s	pilt an existing lot and co	nstruct a single-family detached
dwelling.			
TAX PARCEL NUMBER(S): N000-1147	<u>020</u> ZO	NING DISTRICT:R-	5 (Single-Family Residential)
REQUEST DISAPPROVED FOR THE P six thousand square feet (6,000 SF) and a partion of lot 28) having an area of seven seventy five, noint 71 feet (75,71") wide cu wide is being proposed.	width of fifty feet (50 thousand nine hund)	') are required. One lot, (red forty-nine, zero point	consisting of lots 29, 30, 31 and a 55 square feet (7,949.55 SF) and
DATE REQUEST DISAPPROVED:	/19/2021	FEE WAIV	ER: ☐ YES ⊠ NO
DATE FILED: 1/19/2021 TATTE FILED:	11:10 p.m. PREPAR	ED BY: Andrea Cuffee	RECEIPT NO. BZAR-088772-2021
AS CERTIFIED BY:	M		(ZONING ADMINSTRATOR)
I BASE MY APPLICATION ON:			
SECTION 17.20 PARAGRAPH(S)	OF	THE CHARTER OF TH	E CITY OF RICHMOND
SECTION 15.2 -2309.2 OF THI	CODE OF VIRGIN	LA [OR]	
SECTION 1040.3 PARAGRAPH(S)	OF THE	ZONING ORDINANCE	OF THE CITY OF RICHMOND
	TO BE COMPLETE	D BY APPLICANT	
I have received the handouts, Suggestions	for Presenting Your (ase to the Board & Excer	pts from the City Charter X
I have been notified that I, or my represes	tative, must be prese	at at the hearing at which	my request will be considered.
SIGNATURE OF OWNER OR AUTHOR	IZED AGENT	ul Da	DATE: 4/7/2021
••• TO BE COMPLETED I	Y THE SECRETAR	Y TO THE BOARD OF	ZONING APPEALS ***

_____ AT __1:00

P.M.

CASE NUMBER: BZA 30-2021 HEARING DATE: May 5, 2021

BOARD OF ZONING APPEALS CASE BZA 30-2021 150' Buffer

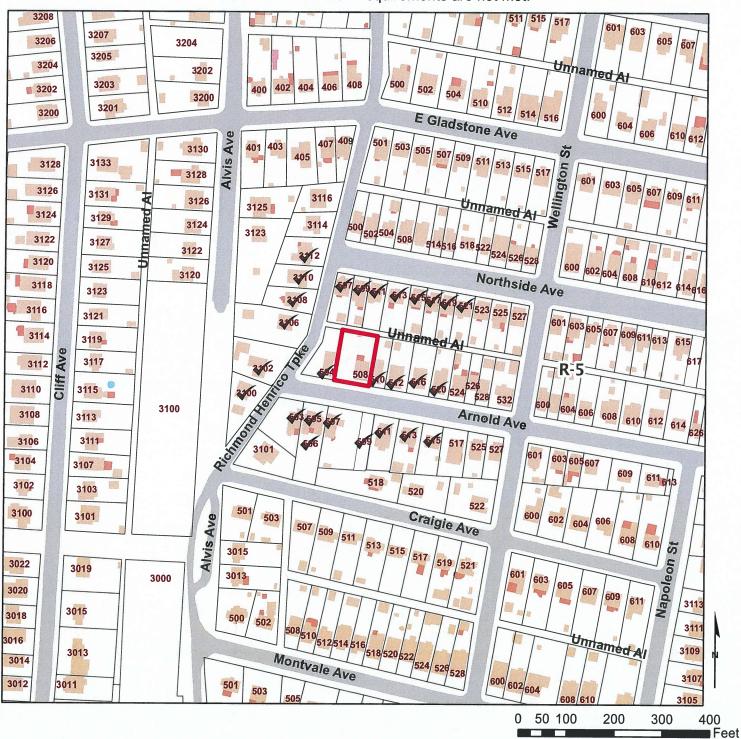
APPLICANT(S): Danielle Antonacci

PREMISES: 508 Arnold Avenue (Tax Parcel Number N000-1147/020)

SUBJECT: A lot split and building permit to construct a new single-family detached dwelling.

REASON FOR THE REQUEST: Based on Sections 30-300 & 30-410.4 of the Zoning Ordinance for the reason that:

The lot area and lot width requirements are not met.





BOARD OF ZONING APPEALS PRESENTATION SUGGESTIONS

CITY OF RICHMOND, VIRGINIA

When presenting your request for a variance or exception to the Board of Zoning Appeals, it is important that you consider the points outlined below. The City Charter requires that every decision of the Board must be based upon a finding of fact that the Board must determine from sworn testimony, together with pertinent evidence, presented at its public hearing. It is essential that the Board receive thorough and complete information in order for it to adequately consider your case and make an informed decision.

- 1. The powers and duties of the Board of Zoning Appeals are specified in Section 17.20 of the City Charter and Article X, Division 5, of the Zoning Ordinance. The Zoning Office will assist you in identifying how your case should be filed. If you have questions regarding your case filing, please contact the Zoning Administration Office (646-6340/6701). Please review the applicable provisions of the City Charter or the Zoning Ordinance thoroughly and address them when presenting your case to the Board to show that the applicable requirements have been satisfied.
- 2. The Board of Zoning Appeals is a quasi-judicial board whose decisions are controlled by statutory law and also take into consideration applicable case law that has been handed down by the Richmond Circuit Court and the Virginia Supreme Court. The Board suggests that if you have any legal questions regarding statutory or case law as it may apply to your application, that those legal issues should be discussed with an attorney before you make your final decision to submit an application to the Board.
- 3. The Board considers it absolutely essential that you discuss your case with your neighbors (notification letters are sent to property owners within a 150-foot radius of your property) as well as your neighborhood association(s). Information regarding your neighborhood association(s) and/or contact person(s) may be obtained from the City's website at http://www.richmondgov.com/PlanningAndDevelopmentReview/civicassociationgroupinformation.aspx Once on the page, you can search for your property using the interactive map. A dialogue box will provide you with the names of all civic groups within which your property may lie. Once you have those group names, scroll down the page to the appropriate group(s) to find the contact information for each.
- 4. Please be advised that if you fail to discuss your request with your neighbors and neighborhood association(s), you should anticipate that your case will be continued until the Board's next regularly scheduled meeting. It is highly recommended that you contact your neighborhood association as soon as possible to determine their meeting schedule in order to be sure you allow yourself enough time to talk to all concerned parties prior to the hearing before the Board. The Board's Rules of Procedure require payment of a \$150.00 continuance fee if the applicant must request a continuance for the reason that the applicant failed to discuss their case with their neighbor(s) or neighborhood association(s).
- 4. You are also strongly encouraged to discuss your pending case with the Secretary of the Board, Roy Benbow (804-240-2124) well before the hearing. The Secretary can be helpful by explaining the BZA public hearing process.
- 5. Utilizing photographs, plans, maps, diagrams and such other written or graphic evidence as needed to fully explain your request can be a great help to the Board in understanding your request and thereby improve your chances for success. Remember a picture is worth a thousand words.
- 6. Note that, although the Board is not authorized to grant a waiver from the zoning regulations based on financial circumstances alone, it may be a factor to be taken into consideration along with other facts in a case. If your case involves such a factor, please provide the Board with complete and relevant financial information for its review.
- 7. The Board's hearings are informal, although all testimony is taken under oath. You are not required to be represented by an attorney in presenting your case. However, if you choose, you may have legal representation and/or may utilize such technical experts or other persons to testify on your behalf as you feel are needed to adequately explain your request to the Board.

Acknowledgement of Receipt by Applicant or Authorized Agent:

(Revised: 4/28/16)

Address: #508 Arnold Avenue Current Owner: Danielle Antonacci

Parcel ID: N0001147020 I.D. 2019 7915 Note: Bearings protracted from City Baseline sheet 41 SW.

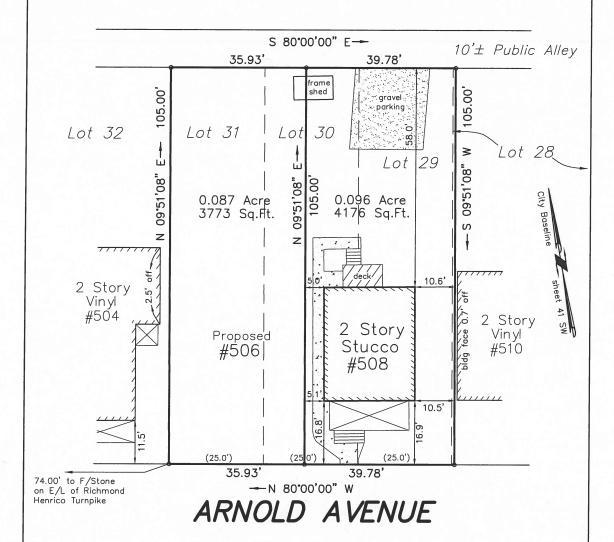


Exhibit Plat of Division for

Part of Lot 28 and Lots 29, 30, & 31, Block 7, Northside Place in the City of Richmond, VA

This is to certify that on 02/15/21 I made an accurate field survey of the premises shown hereon that all improvements and easements known or visible are shown hereon, that there are no encroachments by improvements either from adjoining premises or from subject premises upon adjoining premises other than shown hereon. THIS PLAT WAS MADE WITHOUT THE BENEFIT OF A TITLE SURVEY OR REPORT.

FLOOD INSURANCE NOTE: By graphics plotting only, this property is in ZONE X of the Flood Insurance Rate Map, Community Panel No. 510129 0033D effective date of 04/02/09 Exact designations can only be determined by an Elevation Certificate. Based on the above information, this property IS NOT in a Special Flood Hazard Area.





DAVISON LAND SURVEYING AND MAPPING

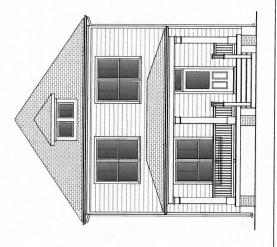
8306 Longlands Pl. Chesterfield, Virginia 23832

(804)314-7441 davisonlandsurveying@gmail.com

DATE: 02/23/21

SCALE: 1"=20'

JN: 21-035



NEW 2-STORY SINGLE-FAMILY DETACHED HOUSE IN RICHMOND'S HIGHLAND TERRACE NEIGHBORHOOD

HOUSE 508 ARNOLD AVE

508 ARNOLD AVENUE RICHMOND, VIRGINIA 23222

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\ \				LAN	R PLANS	ATION & EXTER ELEVATIONS									
DRAWING INDEX		SHEET TITLE	SHEET	ARCHITECTURAL SITE PLAN	FIRST & SECOND FLOOR PLANS	FRONT EXTERIOR ELEVATION & EXTERIOR FINISH SCHEDULE. REAR & SIDE EXTERIOR ELEVATIONS									
RAWIN	DRAWINGS	П	COVER SHEET	ARCHIT	FIRST 6		\parallel								
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PROJECT CONTACTS:
DEVELOPER.
CASEY WHITE
804-869-8600
CONTRACTOR:
RIW DEVELOPMENT
804-869-8600
ARCHITECT
CHRISTOPHER WOLF
HARIS WOLF SACHHECTING
804-814-76414E.

EICHMOND, VIRGINIA 23222

NEW 2-STORY SINGLE-FAMILY DETACHED HOUSE IN RICHMOND'S HIGHLAND TERRACE NEIGHBORHOOD

HORSE

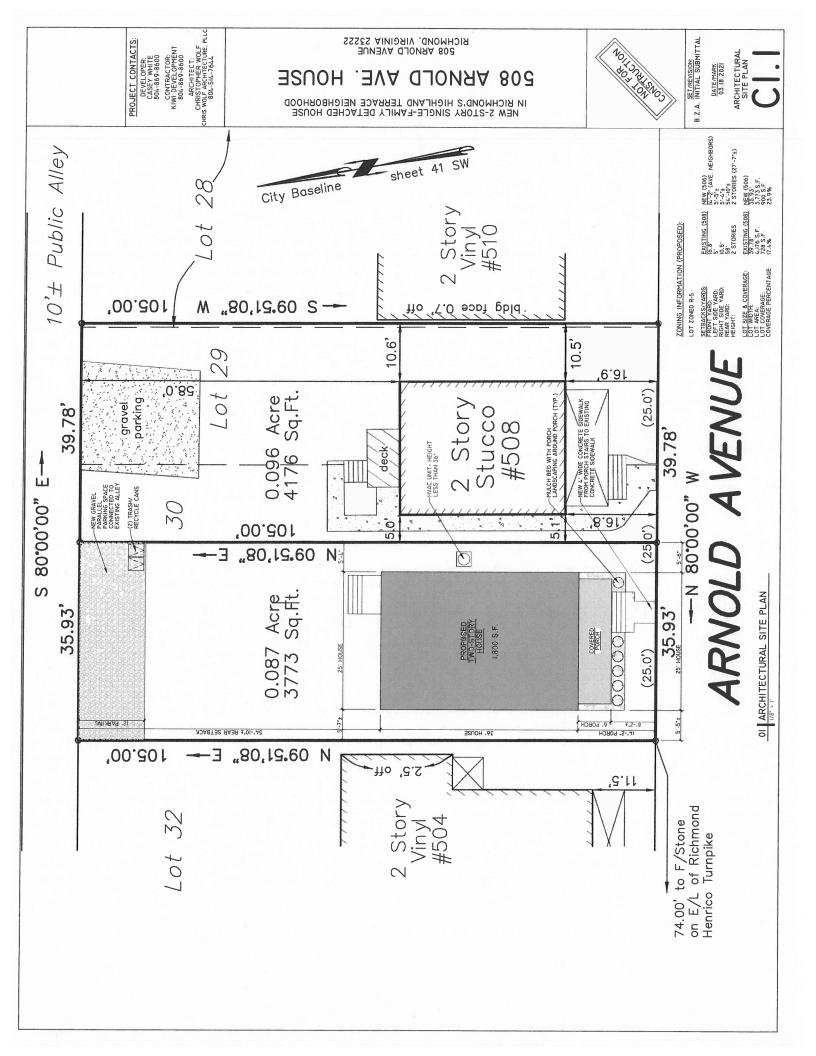
508 ARNOLD AVE.

B.Z.A. INITIAL SUBMITTAL

DATE/MARK

05.18.2021

COVER SHEET



е. ьоксн BULT-INS A.H.U. COATS REAR DECK 7'x3'6-FRONT PORCH 20'4"x6' GREAT ROOM 20'8'x23'9' KITCHEN 18'3'xII' 8'x3' DW YATNA9

01 FIRST FLOOR PLAN



B.Z.A. INITIAL SUBMITTAL

03.18.2021

TOP OF SUBFLOOR

-77-,1

6،-اآ،

FLOOR BEARING

WINDOW HEAD HT.

-11-.6

OI FRONT ELEVATION

APPROXIMATE GRADE TOP OF SUBFLOOR
TOP OF FOUNDATION

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اء	EVIENIOR LINION SCHEDULE		
	NO. COMPONENT/MATERIAL	COLOR/FINISH	REMARKS
П	BRICK PIERS	RICHMOND RED	
П	PARGED FOUNDATION	THRU-COLOR TAN/GRAY	
	FIBER-CEMENT LAP SIDING (HARDIE OR EQUAL)	COLOR TBD	
П	COMPOSITE TRIM- SEE WALL SECTION	PAINTED WHITE	
	FIBER-CEMENT SOFFIT	FACTORY WHITE	
Г	VINYL BEADBOARD PORCH CEILING	NON-VENTED FACTORY WHITE	
П	ENTRY DOOR	PAINTED, COLOR DBD	
П	5/4x4 COMPOSITE DOOR/WINDOW TRIM	PAINTED WHITE	
	VINYL WINDOWS - SEE FLOOR PLANS FOR SIZES	PREFINISHED WHITE	
	10" SQUARE DECORATIVE PORCH COLUMN	PAINTED WHITE	
	COMPOSITE STAIRS/TRIM WITH P.T. WOOD DECKING	PAINTED WHITE FRAME NATURAL WOOD DECKING	
	METAL AND/OR WOOD FRONT PORCH RAILING/ HANDRAIL	WHITE OR BLACK	
	TREATED WOOD REAR DECK/STAIRS/RAILING	NATURAL TREATED WOOD	
	ALUMINUM GUTTER & DOWNSPOUTS	PREFINISHED WHITE	
	ASPHALT SHINGLE ROOF	TBD	
П	FRIEZE CROWN MOULDING- SEE WALL SECTION	PROFILE TBD, PAINTED WHITE	
Г			

TEXTREME FINSH WORD.

I. EXTERIOR THISH WORD.

S. EADLESS SHOWN APPERPROMATIE: A CROSS ALL EXTERIOR ELEVATIONS U.N.O.

S. SEE ADDITIONAL SPECIFICATIONS BY DEVELOPER

G. C. VERIFY ALL MATERIAL & COLOR SELECTIONS WITH DEVELOPER PRIOR TO CONSTRUCTION

PLLC PROJECT CONTACTS: DEVELOPER: CASEY WHITE 804-8690 CONTRACTOR: KIWI DEVELOPMENT 804-869-8600 ARCHITECT: CHRISTOPHER WOLF HRIS WOLF ARCHITECTURE, P 804-514-7644

MIDSPAN OF ROOF (HOUSE HEIGHT)

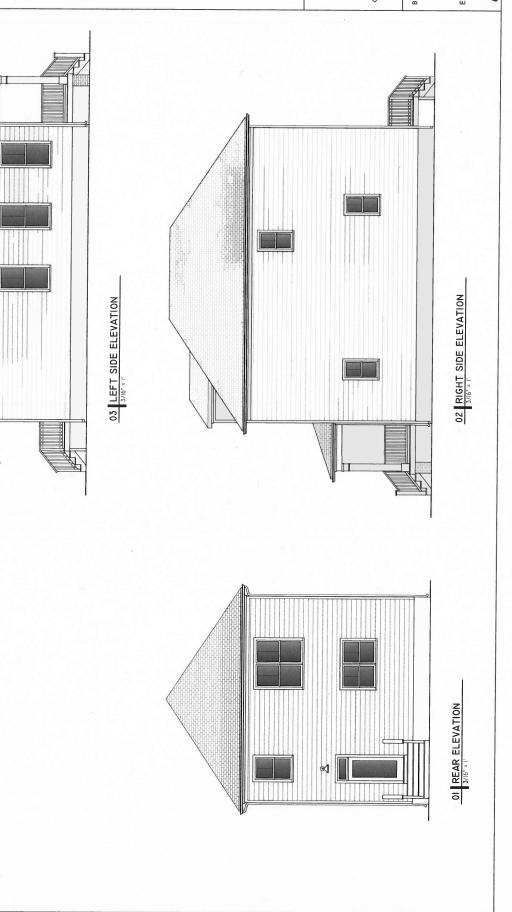
ROOF PEAK

WINDOW HEAD HT.

TRUSS BEARING

508 ARNOLD AVENUE RICHMOND, VIRGINIA 23222

HONZE



PROJECT CONTACTS:

CASEY WHITE

804-869-8600

CONTRACTOR:

RWIN DEVELOPMENT

804-869-8600

CHRISTOPHENT

CHRISTOPHEN WOLF

CHRISTOPHEN WOL

208 VENOLD AVE. HOUSE IN RICHMOND'S HIGHLAND TERRACE NEIGHBORHOOD NEW 2-STORY SINGLE-FAMILY DETACHED HOUSE

208 ARNOLD AVENUE

B.Z.A. INITIAL SUBMITTAL

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O.S. INITIAL SUBMITTAL

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