

FAN DISTRICT ASSOCIATION POSITION - ZONING CODE REFRESH

The Fan District Association (FDA) is closely tracking the City of Richmond's Zoning Code Refresh (Code Refresh) initiative. We have done so since inception and understand it is an evolving process. We recognize the importance of zoning code reform and support the general goals of Code Refresh.

Richmond is a diverse mid-sized city. Our historic architecture and mature neighborhoods are some of our most critical and priceless resources. We **must not** adopt a zoning ordinance that squanders those resources, whether intentionally or not. We can expand housing opportunities in the City while still ensuring our current neighbors and our existing neighborhoods are protected and celebrated. Once you cut down a 100 year old tree, or destroy a 100 year old home, it can never be recovered. We cannot afford to get this wrong.

We have spent significant time reviewing Code Refresh content, clarifying impact, raising resident awareness, collaborating with fellow neighborhood associations, and speaking with City leaders.

We conclude the following:

1. First and foremost, neighborhoods are the life blood of the City - central to economic vitality, citizen well-being, and quality of life. Neighborhoods will be dramatically changed by Code Refresh and bear the brunt of many current proposals. Neighborhood impact merits more thoughtful, measured consideration and **must** be central to the final Code Refresh ordinance.

2. Code Refresh **must** be consistent with Richmond 300, the City of Richmond's Master Plan. It is currently unclear how the two align and balance quality places, equitable transportation, a thriving environment, diverse economy and inclusive housing.

3. To build transparency and trust around the Code Refresh project, the City needs to reach out to individual neighborhoods with substantive, easily understood, neighborhood-level information. Developing neighborhood-level population and housing projections that result from both map and regulatory changes would build trust and allow neighborhoods to develop their opinions based on facts, instead of rumors or abstract city-wide statistics or trends. Communities want certainty and transparency.

4. An incremental approach to any zoning change is necessary. This allows adjustments that achieve Richmond 300 goals without harm to existing communities and the City as a whole. This is not about unending delay. This is a recognition that we must live with the results of Code Refresh **for decades, if not longer.** When dealing with the built environment, we **must** get it right.

5. We support thoughtful density that provides additional housing opportunities and respects the unique characteristics of each City neighborhood. This includes support for contextually appropriate infill development, and both single and multifamily zoning.

6. Code Refresh should be more focused on transit services and Priority Growth Nodes to align with the explicit goals of Richmond 300. Initial zoning changes **must** be more incremental and surgical.

7. We do not support one-size-fits-all solutions. We do not support the elimination of single family zoning and “duplex plus accessory dwelling unit (ADU)” base zoning in all residential zoning districts at this time. We believe there is inadequate evidence of the efficacy of this approach, and significant evidence of potential irrevocable harm from unintended consequences.

8. Code Refresh **must** protect against displacement and demolition. We do not support zoning that incentivizes and promotes the tear down of existing habitable structures in residential and mixed use neighborhoods. Encouraging tear downs is inconsistent with the Richmond 300 goals of High Quality Places, particularly the sections on Historic Preservation (p. 117-121) and Thriving Environment (p. 183-204).

9. A preservation bonus **may** strike an appropriate balance between more residential density and less tear down and demolition. However, no evidence of the economic impact of Code Refresh has been presented with respect to the rezoning of Residential Attached (RA) to Residential Multifamily (RM), Residential Mixed Use (RX), and Mixed Use (MX). A full and independent economic analysis of the impacts of RA and related upzonings **must** be provided to the community and thoroughly reviewed before Code Refresh is adopted.

10. There **must** be contextually appropriate step backs and set backs, consistent with the street’s characteristics, where proposed new density abuts existing residential and mixed use communities. This is especially true for buildings taller than three (3) stories that impact the character and form of established neighborhoods.

11. Sublots are an interesting concept for increasing entry-level homeownership. We are supportive of strategies that increase the opportunity for more people to buy a first home. However, it appears there are very few places where sublots have been adopted, outside of Oregon. Before the subplot concept is adopted City-wide, we want additional, detailed evidence of the real-world impacts. This is reasonable and prudent.

12. To encourage the development of entry-level starter homes, we support a more liberal use of RC zoning in areas that are proximate to transit.

13. We do not support the blanket rezoning of churches to MX-3, especially in communities like the Fan District, where many, if not most, church parcels are small and abut dense residential areas. Allowing MX-3 of right will lead to harmful unintended consequences.

14. We are concerned about “of right” mid-block commercial uses in primarily residential or lower density mixed use areas. We believe commercial and retail uses on corner parcels, including those that abut alleys, may be appropriate. However, the type of “of right” uses permitted is critical and must be carefully considered.

15. Quality of life is key to successful communities and is non-negotiable. Provisions that ensure tree canopy, parks, green space, and access to sunlight must be embedded in Code Refresh in order to comply with the Richmond 300 sustainability goals outlined in the Thriving Environment section, particularly Goal 17: Resilient and Healthy Communities (p. 192-204). The current approach needs additional thinking

16. The ability of the City to affordably provide the necessary infrastructure - including high quality schools, stormwater management, water supply, and street and transit services - must be addressed in an open and analytical manner before the adoption of the Zoning Code Refresh ordinance.

We look forward to the opportunity to work with the City's elected leaders to ensure that the goals of Code Refresh are achieved, without inadvertent harm to communities throughout the City. We look forward to additional dialogue and thoughtful discussion.