

Oregon Hill Home Improvement Council

619 West Cary Street, Richmond VA 23220

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TO: Richmond City Council, Richmond Planning Department and Zoning Advisory Council
FROM: Oregon Hill Home Improvement Council, 619 West Cary Street, Richmond 23220
RE: Proposed rezoning for the Oregon Hill Historic District
DATE: September 25, 2025

On behalf of the Oregon Hill Home Improvement Council, Inc. (OHHIC), we are writing in strong opposition to the shockingly inappropriate new zoning that is proposed for the Oregon Hill Historic District.

OHHIC’s very successful 30+ year affordable housing program has combined the twin goals of **providing affordable work-force housing while preserving the historic homes of Oregon Hill.** We have successfully renovated dozens of historic homes and built compatible infill homes in Oregon Hill while selling them to first-time home-buyers. Some of these first-time home-buyers have remained in their homes for 30 years with payments as low as \$300/month.

However, the draconian new zoning proposed for the Oregon Hill Historic District threatens to undo all of the progress that we have made in affordable housing and historic preservation. Since there are very few vacant lots in Oregon Hill, the new zoning would incentivize the demolition of the historic and affordable family homes in our close-knit neighborhood in order to build huge dorm-like structures for students at the adjacent Virginia Commonwealth University. The proposed zoning exhibits little awareness or respect for the boundaries of the Oregon Hill Historic District, which was listed on the National Register of Historic Places and Virginia Landmarks Register in 1991.

The rezoning recommendations of the Zoning Advisory Council are both inequitable and unreasonable. The Zoning Advisory Council was not appointed by our elected representatives. We note that OHHIC Board members, who have a great deal of actual experience with affordable housing, volunteered to serve on the Zoning Advisory Council, but we were not allowed to serve on this group. There is little representation from the preservation community, environmental advocates or neighborhood leadership on the Zoning Advisory Council. We urge our elected City Council members to name a new Zoning Advisory Council or Board to advise City Council on rezoning our city.

We are alarmed that proposed new zoning for Oregon Hill is based upon a “Pattern Book” prepared by the city’s zoning consultant that was fraught with errors. Oregon Hill is an intact 19th century neighborhood primarily of attached homes. However, in the city’s “Pattern Book” the neighborhood was inaccurately described as a 20th century neighborhood with all detached buildings. The Planning Department refused to correct the misinformation even after we provided the correct data. The consultant used this grossly inaccurate data to suggest that the buildings of Oregon Hill are nonconforming with rules of our existing R-7 zoning, which we fought hard to obtain in the year 2002.

Oregon Hill is already one of the most densely built neighborhoods in the city, and for over a century-and-a-half we been a resource for affordable housing for working families. We have consistently been promised that the 35 foot maximum height limit and 55% maximum lot coverage will be maintained for all of the properties within our existing R-7 zoning. However, we see that some properties currently zoned R-7 within the Oregon Hill Historic District are now proposed to allow buildings with a 55 foot and even 75 foot maximum height limit “by right”. Furthermore, six-story buildings with a maximum height limit of 90 feet on West Cary Street are proposed “by right” for the properties currently with a 35 foot maximum height limit under B-3 zoning. Such drastic changes in the current zoning would be devastating and incentivize the destruction of our historic district and cohesive neighborhood. It appears that Artificial Intelligence (AI) must have been used to generate the proposed zoning that is so obviously incompatible with the historic district.

This inappropriate proposed zoning violates the Richmond 300 Master Plan: Shocking in its insensitivity, areas of MX-6, RX-6 and RX-4 zoning are proposed within the Oregon Hill Historic District that would allow 90’, 75’ and 55’ maximum height limits. **Such proposed zoning violates Richmond 300 Master Plan Goal 3** to “Support growth that preserves the historical urban fabric...”; **and violates Richmond 300 Master Plan Objective 3.1:** “Preserve culturally, historically, and architecturally significant buildings, sites, structures, neighborhoods, cemeteries, and landscapes that contribute to Richmond’s authenticity”; **and violates Richmond 300 Master Plan Objective 3.2:** “Reduce the demolition of historic buildings (a.) Create flexibility in the Zoning Ordinance to encourage the adaptive reuse of historical buildings and deter demolition, such as allowing for compatible densities and uses in historical areas...”

OHHIC strongly objects to the radical change proposed in the zoning for our OHHIC-owned historic Jacob House property at 619 West Cary Street from the current B-3 zoning with a 35’ height limit to MX-6 zoning with a 90’ height limit. The two-story Jacob House is one of the most historically significant buildings of Richmond with a highway marker approved by the Va. Department of Historic Resources. The Jacob House, owned by OHHIC, was constructed in 1817 by the free-black apprentices of Quaker George Winston. It was the first house constructed in the Town of Syndey, which later became the Fan and Oregon Hill. It is extremely disrespectful to propose new zoning that would allow “by right” construction that would dwarf the historic site with 90’ buildings.

We call on the Richmond City Council to protect the affordable housing and authentic, historic streetscapes of the Oregon Hill Historic District with the following specific changes to the proposed zoning:

- **All properties within the Oregon Hill Historic District currently zoned B-3 on the 600, 700 and 800 blocks of West Cary Street must be designated with the MX-3 zoning (not MX-6 zoning). Furthermore, the maximum height limit for the proposed MX-3 zoning designation must be reduced from 45 feet to 35 feet.**

On the 600, 700 and 800 blocks of West Cary Street we find some of the most historical buildings in Richmond. We take particular pride in the OHHIC-owned property, the historic Jacob House at 619 W. Cary Street that was built in 1817. The Greek Revival William Smith House at 611 W. Cary was built in 1842. The Second Empire Siewer’s House at 609 W. Cary was built in the 1890s. These landmarks along with important business properties in the Oregon Hill Historic District, like the Bakery Cafe at 825 W. Cary and the old Mojo’s restaurant at 733 W. Cary, built in the 1890s, need to be protected from inappropriate proposed six-story MX-6 zoning that would allow “by right” the construction of buildings 90’ in height. Such outrageous and insensitive zoning proposals are incompatible with the existing scale and character of the Oregon Hill Historic District.

- **All properties now zoned R-7 with a current 35' height limit on the 100 block of South Pine Street, 100 block of South Laurel Street and 100 block of South Cherry Street must be designated with the RA-A zoning (not RX-4 zoning).**

The historic two-story homes, north of Green Alley, form a unified historic streetscape with the other two-story homes on the 100 blocks of South Pine, Laurel and Cherry Streets. These two-story homes, including 104, 106 and 106-1/2 S. Pine Street; 103 and 109 S. Laurel Street; and 117, 119, 121 and 123 S. Cherry Street must be rezoned with the RA-A zoning, as has been proposed for the other properties on the 100 blocks of South Pine, Laurel and Cherry Streets. The inappropriately proposed RX-4 zoning with a height limit of 55' would incentivize the demolition of this vital historic streetscape.

- **Six-story zoning with a 90' height limit on the historic 600, 700 and 800 blocks of West Cary and four-story zoning with a 55' height limit on the 100 blocks of South Pine, Laurel and Cherry Streets is NOT supported by the Richmond 300 master plan, which calls for building heights in Community Mixed-Use districts to be based on the "historic context" of the blocks.**

According to the Richmond 300 Master Plan, "The building size, density and zoning districts for these [Community Mixed-Use] areas may vary significantly depending on the historic densities and neighborhood characteristics. Future development should generally complement existing context".

- **The two-story, individually-owned Parsons Row condominiums at 605 Spring Street currently zoned R-7 must be designated with the RA-A zoning (not RX-4).**

The Parsons Row condominiums were the result of careful Special Use Permit negotiations that allowed interior construction on the block in exchange for adhering to the 35 foot maximum height limit of the current R-7 zoning. The two-story condominiums were designed to be compatible with the adjacent two-story homes on the 500 block of South Pine Street and the 600 block of China Street. The 1819 Samuel P. Parsons House is an extremely important historical resource with a highway marker approved by the Va. Department of Historic Resources. The house was built in 1819 by a Quaker engineer who also served as an early Superintendent of the nearby Penitentiary. The Parsons Row condominiums were built on the same parcel as the Samuel P. Parsons House on property formerly owned by the Commonwealth of Virginia. Targeting the two-story condominiums with inappropriate RX-4 zoning with a 55' height limit is disrespectful of the historic property. Zoning must complement the existing historical context according to the Richmond 300 Master Plan.

- **The R-7 zoned St. Andrews property at 316 Linden Street must be rezoned RA-A (not RX6).**

This property at 316 Linden Street provides an important gateway entrance to the Oregon Hill Historic District and currently is used as the recreational playground for St. Andrews School. It would be entirely inappropriate to rezone this property RX-6 with a "by right" 75' maximum height limit. The RA-A district with a 35 foot height limit for two-story homes consistent with Oregon Hill's historic fabric is appropriate for this important gateway property.

- **RA-A zoning must maintain the 35 foot height limit, maximum 55% lot coverage and rear yard setback requirement now found in Oregon Hill's R-7 zoning.**

Over 90% of Oregon Hill's buildings in the current R-7 zoning comply with the 35 foot height limit, 55% maximum lot coverage and rear set back rules of our R-7 zoning. Changing these zoning rules to allow an excessive increase in density in our already very dense neighborhood would incentivize the destruction of our relatively modest, affordable Oregon Hill homes. Any increase in allowed maximum lot coverage in Oregon Hill would have very detrimental environmental consequences since most back yards in the neighborhood provide vital shade and gardens. Very little thought has been given to the negative impacts on quality of life that the proposed 80% maximum lot coverage and the elimination of any requirement for rear yards would have on our very densely built neighborhood.

- **RA-A zoning must NOT allow “By Right” business use, including retail business, and dining use, and alcohol sales.**

A fundamental purpose of zoning is to not allow inappropriate uses adjacent to residences. Oregon Hill has been a residential neighborhood for over a century-and-a-half. The proposed zoning rules that would allow retail business, dining establishments and alcohol sales “by right” in any house in Oregon Hill is not acceptable. Most buildings in Oregon Hill are attached frame homes and such business uses in the attached dwellings would result in intolerable noise, crowding and disturbance of the peace. Affordable housing would be eliminated if dwelling units are allowed to be converted to business function “by right.” Oregon Hill has successfully supported business use on a case by case basis where the concerns of the neighborhood are accommodated through the Special Use Permit process.

- **The MX-3 zoning proposed for Oregon Hill properties currently zoned B-1 must limit maximum building height to 35 feet.**

The proposed 45 foot height limit for MX-3 zoning would almost double the allowed 25 foot height limit in the currently zoned B-1 properties. A 35 foot maximum building height limit for MX-3 zoning would be consistent with the adjacent RA-A zoned properties and the unified two-story streetscape of the Oregon Hill Historic District. A 35 foot maximum building for the three-story MX-3 zoning would be consistent with the maximum building height limit for other proposed three-story zoning, such as the RD-A district with a three-story and 35 foot maximum height limit.

- **Oregon Hill Historic District must be removed from the circled “VCU Node” zone.**

The “VCU Node” circle must not encroach into the Oregon Hill Historic District south of West Cary Street. The “VCU Node” circle was eliminated south of West Cary Street in the Richmond 300 Master Plan, and it is extremely concerning that the “VCU Node” circle extends south of West Cary Street in the proposed rezoning. In 1990, VCU was forced to withdraw its proposed Master Plan that extended VCU’s campus south of Cary Street. The VCU Master Plan encroachment into Oregon Hill south of West Cary Street was not supported by the Virginia Art and Architectural Review Board, the Virginia Department of Historic Resources, the Virginia Department of Environmental Quality, the faculty of the VCU Urban Studies Department, and over a dozen of preservation organizations, including the Association for the Preservation of Virginia Antiquities, Preservation Virginia, and the Victorian Society.

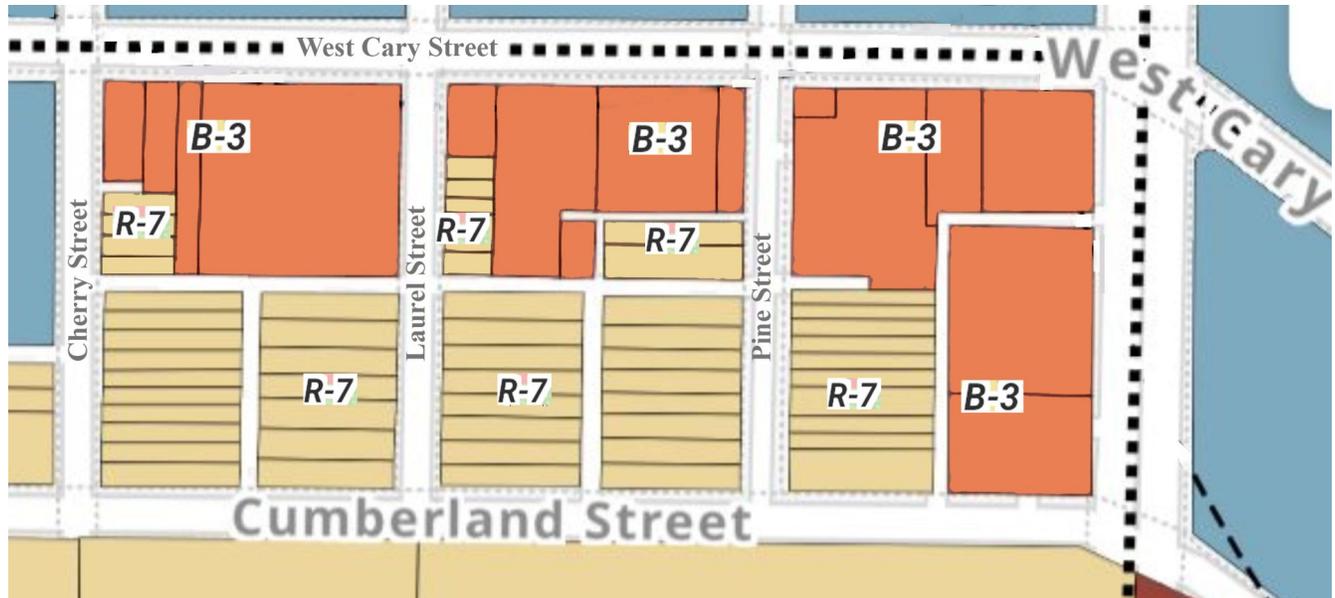
- **Special Use Permits should be encouraged.**

In every case, the Special Use Permit process has resulted in better outcomes for the Oregon Hill community and the developer. It allows the neighborhood to negotiate with developers to accomplish their goals in a manner that is compatible with the historic district. It is distressing to read that one of the goals of the city-wide rezoning is to eliminate the need for Special Use Permits. Examples of where the Special Use Permit process successfully resulted in favorable outcomes in the Oregon Hill Historic District include the Overlook Condominiums, the Parsons House Condominiums, and business uses in the neighborhood.

- **Affordable Oregon Hill homes must be protected from upzoning.**

A fundamental flaw with the proposed rezoning is the assumption that greater density and upzoning will result in more affordable housing. The relatively modest Oregon Hill homes have been a resource for affordable housing for working families for over 150 years. Since obtaining the appropriate R-7 zoning in 2002, land speculation greatly decreased and many families with young children looking for starter homes returned to the neighborhood. We must not allow Oregon Hill’s affordable housing to be jeopardized by upzoning. Any bigger, taller buildings allowed by upzoning adjacent to VCU would result in the displacement of working families for student dormitory-like buildings.

This map (below) shows the current appropriate zoning of the northern portion of the Oregon Hill Historic District between Cary, Cumberland, Belvidere and Cherry Streets. The current R-7 and B-3 zones on these blocks have the appropriate 35 foot maximum building height limit that we must maintain to complement the existing historical context:



While we would prefer that the existing zoning be maintained, this map (below) shows new zoning recommended by the Oregon Hill Home Improvement Council for the northern portion of the Oregon Hill Historic District between Cary, Cumberland, Belvidere and Cherry Streets -- MX-3 zoning with a three-story 35 foot height limit on West Cary Street and with RA-A zoning with a 35 foot height limit on the 100 blocks of South Pine, Laurel and Cherry Streets:



The following photographs show the buildings contributing to the Oregon Hill Historic District on the 600, 700 and 800 blocks of West Cary Street that would be jeopardized by the inappropriate, proposed MX-6 Mixed-use 6-story zoning that “by right” would allow buildings with a huge height of 90’ (MX-3 with a 35’ height limit would be appropriate for these blocks):



600 Block of West Cary: from left, Siewers House (built 1890s), William Smith House (built 1842), Jacob House (built 1817)



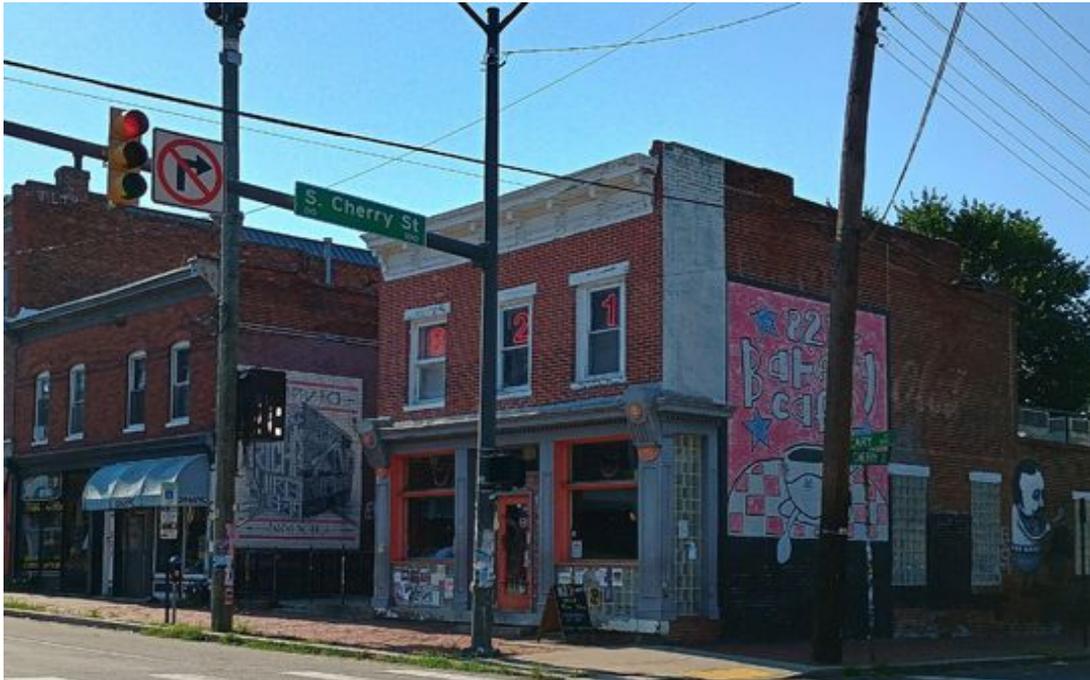
619 W. Cary Street, Jacob House (built in 1817), owned by OHHIC

(Continued)

The following photographs show the buildings contributing to the Oregon Hill Historic District on the 600, 700 and 800 blocks of West Cary Street that would be jeopardized by the inappropriate, proposed MX-6 Mixed-use 6-story zoning that “by right” would allow buildings with a height of 90’ (MX-3 zoning with a 35’ height limit would be appropriate for these blocks):



700 block of West Cary



800 Block of West Cary Street

The following photographs show the two-story buildings contributing to the Oregon Hill Historic District on the 100 blocks of S. Pine, S. Laurel and S. Cherry Streets that are threatened with the inappropriate RX-4 (Residential 4-story zoning) that would allow “by right” buildings 55’ in height. (The 100 blocks of S. Pine, S. Laurel and S. Cherry Streets must be zoned RA-A.):



100 block of South Pine Street, 104, 106 and 106-1/2 S. Pine Street



100 block of South Cherry Street, 117, 119, 121 and 123 S. Cherry Street

(Continued)

The following photographs show the two-story buildings contributing to the Oregon Hill Historic District on the 100 blocks of S. Pine, S. Laurel and S. Cherry Streets that are threatened with the inappropriate RX-4 (Residential 4-story zoning) that would allow “by right” buildings 55’ in height. (The 100 blocks of S. Pine, S. Laurel and S. Cherry Streets must be zoned RA-A.):



100 Block of South Laurel Street, 103 S. Laurel Street

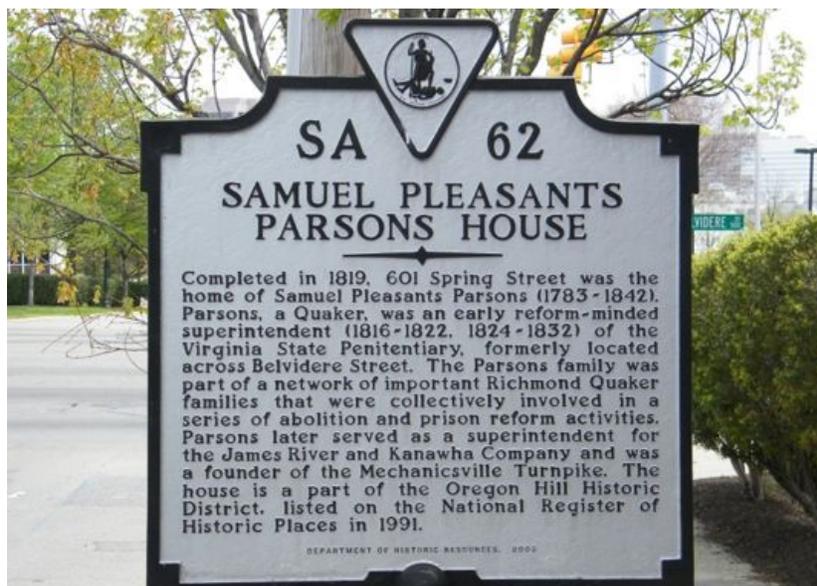


100 Block of South Laurel Street, 109 S. Laurel Street

The following photograph shows the two-story, privately-owned Parsons Row condominiums at 605 Spring Street that are threatened with the inappropriate RX-4, Residential 4-story zoning, that would allow “by right” buildings 55’ in height and group homes such as college fraternity houses. (605 Spring Street Parsons Row condominiums must be zoned RA-A.)



605 Spring Street two-story privately-owned Parsons Row condominiums



The 1819 Samuel Parsons House at 601 Spring is honored with a VDHR highway marker.

The Oregon Hill Historic District comprises a unified, dense, streetscape of relatively affordable two-story homes that are mostly attached. (RX-4, RX-6, and MX-6 zoning districts are NOT appropriate within the Oregon Hill Historic District.) “By right” business use in the RA-A district is NOT appropriate and would reduce the affordable housing stock, displace families and disturb the peace of the neighborhood. Building height should be limited to 35’ with 55% maximum lot coverage, compatible with the historic fabric and existing zoning of Oregon Hill.

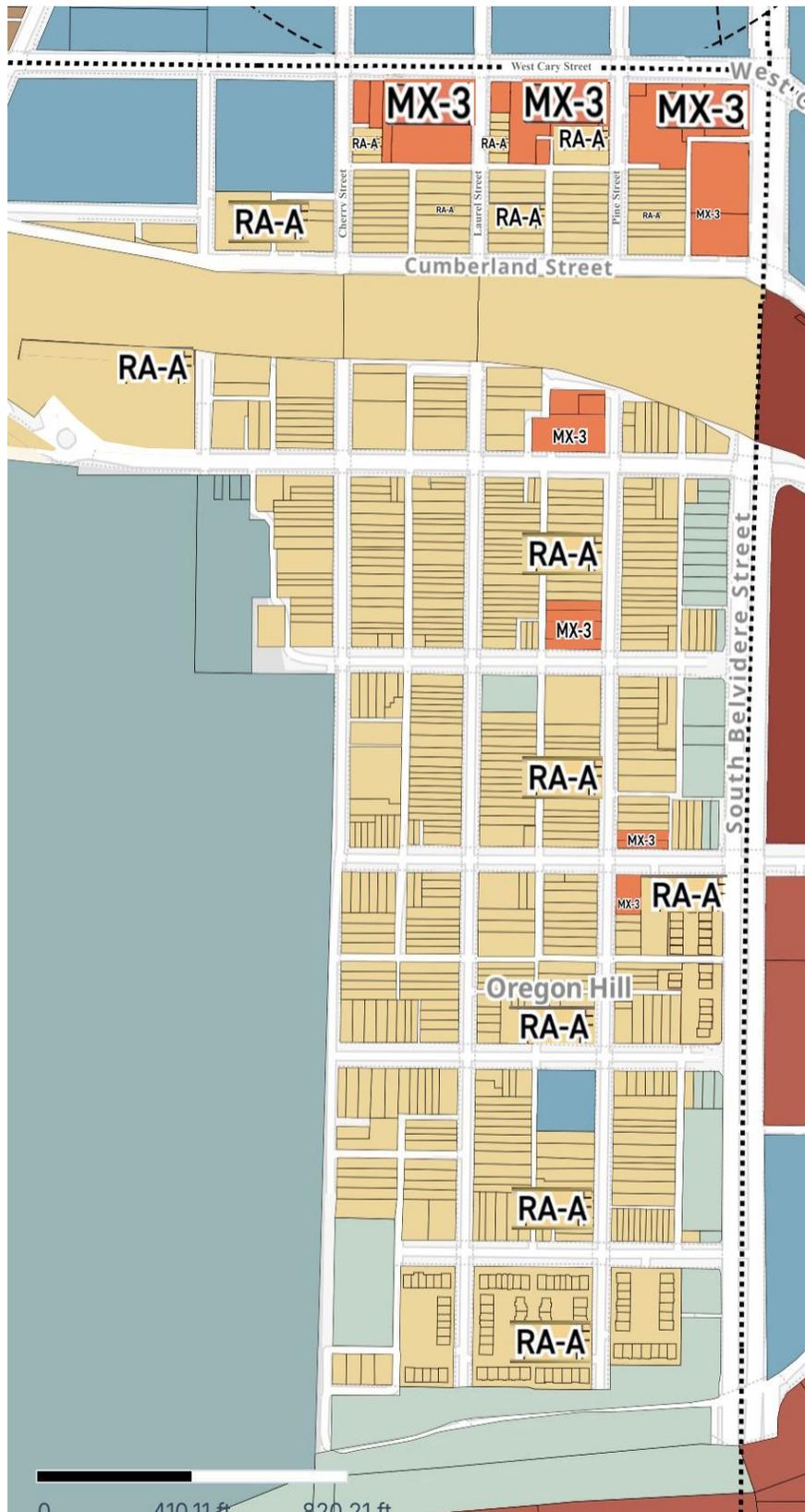


300 block of South Laurel Street



300 block of South Pine Street

The map (below) shows the zoning proposed by the Oregon Hill Home Improvement Council for the entire Oregon Hill Historic District between West Cary Street to the north, the James River and Kanawha Canal to the south, Belvidere Street to the east and Linden Street to the west. The 100 blocks of Pine Laurel and Cherry, the Parsons Row Condominiums at 605 Spring Street, and the St Andrews recreation field at 316 Linden Street must be designated with the RA-A zoning. The 600, 700 and 800 blocks of West Cary and must be designated with the MX-3 zoning:



In summary, OHHIC strongly objects to the rezoning proposed for the Oregon Hill Historic District which would greatly damage the affordable housing and historic fabric of the neighborhood.

The following changes must be made to the proposed rezoning:

- All properties within the Oregon Hill Historic District that are currently zoned R-7 must be zoned RA-A.
- All of the properties on the 100 block of South Pine, 100 block of South Laurel and 100 block of South Cherry Street, including 104, 106 and 106-1/2 S. Pine Street; 103, 105 and 109 S. Laurel Street; and 117, 119, 121 and 123 S. Cherry Street must be zoned RA-A.
- All properties that are currently zoned B-3 within the Oregon Hill Historic District must be zoned MX-3, and MX-3 must be revised to have a 35 foot maximum height limit. These properties include all of the 600, 700 and 800 blocks of West Cary Street which must be zoned MX-3.
- The Oregon Hill Historic District south of West Cary Street must be removed from the “VCU Node” circle, consistent with the Richmond 300 Master Plan.
- The RA-A zoning proposed for much of the Oregon Hill Historic District must not allow business use “by right”. Retail, dining uses and alcohol sales must NOT be allowed “by right” in RA-A zoning.
- The the maximum lot coverage must be no greater than 55% in the RA-A zoning, and the maximum height limit must be 35 feet.
- The two-story Parsons Row condominiums at 605 Spring Street must be zoned RA-A.
- The St. Andrews athletic field at 316 Linden Street must be zoned RA-A.
- MX-3 must be revised to have a 35 foot maximum height limit. All properties that are currently zoned B-1 within the Oregon Hill Historic District must be zoned with MX-3 with a maximum height limit no greater than 35 feet, consistent with the adjacent RA-A properties.
- Any rezoning must recognize the importance of, and encourage the use of, the Special Use Permit process which has served the neighborhood well.
- The affordable workforce housing in Oregon Hill must not be displaced by zoning that allows greater density.

Thank you for your attention to the request of the Oregon Hill Home Improvement Council for appropriate zoning for the Oregon Hill Historic District. We are concerned that despite having taken part in Richmond 300 and Code Refresh meetings, the concerns of Oregon Hill residents have been largely ignored. Please respect the input from this neighborhood organization that has successfully worked for over 30 years to improve the affordable housing and historic resources of the Oregon Hill Historic District. We are undergoing a renaissance with young families with children moving to the neighborhood. Please do not undermine our successful efforts with ill-advised, inappropriate zoning.