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Via email: jloichinger@achp.gov

June 2, 2017

Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

RE: Proposed Redevelopment of the Ramsey Homes City of Alexandria, Virginia

Dear Ms. Vaughn,

In response to your March 29, 2017 letter regarding the redevelopment of Ramsey Homes (the "Project"), please find our responses below to the questions that have been raised and our efforts to remain compliant with 36 CFR Section 800.11(e).

Are there meeting minutes from the consulting parties meeting held on February 15, 2017, that can be shared with the consulting parties? Are there any other consulting parties that should be identified and invited to participate in the resolution of adverse effects?

The meeting minutes from the February 15, 2017, Section 106 meeting have been prepared and posted to the City web site. We have made an exhaustive effort to reach out to and engage potential consulting parties. Currently, we have broad representation among neighbors, residents, civic groups, historic preservation organizations, and See **Attachment 1** for a list of parties (a) invited to participate as a consulting party, along with the invitation, and (b) the resulting List of Consulting Parties which represents those parties who responded that they were interested in participating.

What mitigation measures have been suggested by consulting parties, to date? Has the City considered the viability of these measures, and shared its thoughts with the consulting parties? Do the mitigation measures consider the undertaking's indirect effects?

At a meeting held November 29, 2016, the consulting parties were asked to provide, in writing, a list of any mitigation ideas they would like to see implemented at the site. In follow-up, a letter

was sent to all consulting parties on December 6, 2016 formalizing this request and setting forth a deadline of January 6, 2017 for responses. On January 23, 2017, Wetlands issued a letter inviting the consulting parties to a meeting on February 15, 2017. The mitigation ideas received in response to the December 6, 2016 request for mitigation ideas were included in this February 15, 2017 meeting invitation along with the formal DHR comments on the Project and adverse effects on archeological and architectural resources. The letter encouraged that attendees to come prepared to discuss mitigation strategies.

Additionally, from the responses received, City staff compiled a list of the mitigation ideas including an estimate of the cost of each idea and whether it occurs pre- or post-demolition activities. This information was shared with the consulting parties at the February 15, 2017 meeting and posted to the City website and the attendees were permitted to vote for the purposes of ranking the ideas. Beyond that meeting, the city staff conducted an online survey to allow voting by the consulting parties and the community at-large. The mitigation ideas were again discussed with the consulting parties in a recent meeting on April 26, 2017, along with another recapping of the process for draft and execution of a Memorandum of Agreement (MOA). In fact, the main purpose of the April 26th meeting was to bring closure to the mitigation ideas so that the MOA can be drafted/finalized.

What is the timeline for completing Section 106? Have the milestones been discussed with the consulting parties to ensure that they can participate meaningfully?

The earlier schedule for draft and execution of the MOA in May has been extended; it is currently anticipated that the MOA will be executed in June after action is taken by the City Council at a regularly scheduled legislative meeting. The milestones have been discussed in multiple meetings as the process has progressed and the consulting parties have had significant involvement in the decisions regarding mitigation.

Have any comments been provided by local preservationists expressing concerns about the long-term effects of the City's proposed activities in this part of the community?

In addition to the letters provided at posted to the website, there were various communications relaying concerns which were addressed as part of the City process. For concerns expressed orally, we would encourage you to visit the City website for a video of the City Council and Planning Commission public hearings and meetings some of which include the testimony of the preservationists and all letters submitted to City regarding these public meetings are provide as part of the docket materials for BAR, Planning Commission and City Council.

Below is a summary of the actions taken to address the concerns over the course of the projects development.

The Ramsey Homes redevelopment project has had a long history, including a one year extension that is a direct result of the concern over the historical nature of the Project. ARHA submitted an initial concept plan in the fall of 2014 to redevelop the property with two four-story multi-family buildings with 64 housing units and a height noted as less than 50 feet.

This concept plan was revised in early spring of 2015 for two multi-family buildings that were four stories with an approximate height of 44 feet. In these initial concepts, the buildings were shifted to the western side of the site to allow for surface parking on the east side alley. Through conversations with City staff and in response to comments from the Parker-Gray Board of Architectural Review (BAR), the applicant revised the concept to two three-story multi-family buildings, 53 housing units, and a height of approximately 39 feet.

In order to facilitate redevelopment of this property, ARHA applied for a Permit to Demolish the existing buildings from the Parker Gray BAR. The BAR denied the request on April 22, 2015 by a vote of 5-0.

ARHA’s history consultant spent the time between the BAR vote and the September 12, 2015 appeal, compiling a new history report for the Project. The completed report was provided to city staff in August. On September 12, 2015, the City Council voted to reverse the decision of the BAR, and conditioned the demolition of the structures on approval of the land use modifications that would result from the development review process.

During the hearing on the Permit to Demolish, the City Council requested that ARHA investigate additional alternative approaches to redeveloping the Ramsey property to address a number of concerns raised by Council and the community prior to bringing forward a request for a Development Special Use Permit. Among these issues, were concerns about the appropriateness of the proposed mass and scale, the overall percentage of open space proposed, and the potential preservation of one or two existing buildings.

In October 2015, the development team participated in a charrette with the City staff to begin to consider the possibility of full or partial rehabilitation of the existing buildings. Primary to this study was the HUD criteria that ARHA not spend more to rehabilitate an existing building than it would cost to tear it down and build new.

Options Studied

	ARHA Concept	Rehab /Infill	Rehab /Infill	Rehab /Infill
Demolish: No. of Buildings	4	2	3	3
Rehabilitation: Buildings	0	2	1	1
Rehabilitation: Units	0	8	4	4
New Construction:	53	22	39	46
Total Units	53	30	43	50

At the February 4, 2016 meeting of the Planning Commission, the application by ARHA for the demolition of all four existing buildings and the construction of two multi-family buildings for a total of 53 housing units was considered. The Planning Commission recommended the approval of the Master Plan Amendment and the Rezoning request, but recommended denial of the Development Special Use Permit.

On February 20, 2016, City Council considered the above- stated application by ARHA. During this session, City Council approved the Master Plan Amendment, however the Rezoning was denied due to a lack of a supermajority. The Applicant had requested a deferral of consideration of the Development Special Use Permit.

On February 23, 2016 the Master Plan Amendment and Rezoning actions were rescinded by City Council. At a re-hearing of the case on March 12, 2016, City Council approved the Master Plan Amendment and Rezoning, and deferred the Development Special Use Permit as requested by the Applicant. City Council additionally passed a resolution for a joint City-ARHA work plan additional consideration and development of alternative plans for Ramsey Homes with the goal of preserving one existing building. This study was in addition to the study conducted in October of 2015.

On June 28, 2016, ARHA and City Staff presented two alternative plans developed by the joint City-ARHA work group to the City Council in order to obtain feedback from the City Council on how to move forward. One alternative (“Proposed Concept”) consisted of the two-building plan previously submitted by ARHA with building improvements. The second alternative (“Alternate Concept”) preserved and renovated one of the existing buildings for two multi-family units on the northern end of the site, while creating a four-story multi-family building with 52 dwellings on the southern side of the site. The Alternate Concept was recommended by City Staff.

Ultimately, when presented with the Proposed and Alternate Concepts, the City Council recommended a Concept that was a permutation of the Alternate. What the Council determined was the demolition of all improvements, the construction of one 52-unit multi-family building with the building shifted to the north of the site, creating an open space at the corner of North Patrick and Pendleton Streets.

The City appreciates the Advisory Council’s involvement in this process and looks forward to continued collaboration on the Memorandum of Agreement for the Ramsey Homes Project.

Sincerely,



Eric Keeler

Attachment: List of Parties Invited to Participate in the Section 106 Process with Sample Invitation and, Ramsey Homes Final Consulting Parties List

Website with more information:

<https://www.alexandriava.gov/housing/info/default.aspx?id=90874#RamseyHomesSection106ConsultingPartiesMeetingsandInformation>

City of Alexandria Docket Website:

<https://www.alexandriava.gov/hub.aspx?id=90631>