



**Comments on Proposed Rulemaking
Submitted by Historic Mount Pleasant, Inc.
Zoning Commission Case No. 08-06A
Zoning Regulations Rewrite
September 24, 2015**

The major revision to the District's Zoning Regulations now proposed as a result of the years-long Zoning Regulations Rewrite (ZRR) do not incorporate amendments for R-4 zones approved by the Zoning Commission in June 2015. This is a serious omission which must be corrected before the ZRR takes effect.

On November 7, 2013, Historic Mount Pleasant appealed to the Zoning Commission to eliminate the matter-of-right conversion authority affecting R-4 zones that was proposed to be continued under the ZRR for Residential Flat zones. Notwithstanding the interest initially shown by the Commission in providing such relief for the Mount Pleasant Historic District, the Commission ultimately voted to maintain the conversion authority unchanged in the ZRR.

In the meantime, in a separate case (ZC No. 14-11), the Office of Planning proposed changes to both the height limitations and conversion authority for R-4 zones generally, and – after several hearings and reformulations of the proposed amendments – the Zoning Commission approved amendments to the longstanding R-4 authorities on June 8, 2015. However, none of these amendments, which took effect June 26, 2015, are reflected in the ZRR now before you.

While Historic Mount Pleasant does not consider the recent amendments sufficient to address the serious problems with conversions that are continuing in our historic district, we certainly expect them to be incorporated into the ZRR before it enters into force. Indeed, we are surprised that the Zoning Commission has not stated its intention publicly to proceed in this fashion. The two cases have been on parallel tracks, but the two texts should now be merged. The amendments approved in Case No. 14-11 must become part of the ZRR before it takes effect.

We will be watching implementation of the recent R-4 text amendments and will bring any problems to the attention of the Office of Planning and the Zoning Commission as they occur.

Respectfully submitted,

Fay Armstrong
President