

**CHAPEL HILL HISTORIC DISTRICT COMMISSION RECOMMENDATION
TO THE CHAPEL HILL TOWN COUNCIL
May 24, 2023**

HOUSING CHOICES FOR A COMPLETE COMMUNITY: LUMO TEXT AMENDMENTS

At its May 9, 2023 meeting, the Chapel Hill Historic District Commission (HDC) voted unanimously to recommend that the proposed "Housing Choices for a Complete Community" text amendments in their current form not be applied to the Town's three local historic districts and that these three districts instead retain the existing densities and definitions of their residential zones.

The HDC arrived at this decision after hearing a staff presentation and public comment concerning the proposed text amendments and considering the likely impacts of the proposed changes on the historic districts. In the HDC's view, the proposed text amendments are inconsistent with the Town's commitment to protect and preserve Chapel Hill's historic neighborhoods and lack the safeguards that Town staff state are necessary to guarantee the continued preservation of local and National Register-designated historic districts.

Specifically, Chapel Hill's Land Use Management Ordinance (LUMO) (section 3.6.2) states that the Town's local historic districts have been established "to protect and conserve the heritage and character of the Chapel Hill community by providing for the preservation of designated areas within the planning jurisdiction, including individual properties therein that embody important elements of social, economic, political, or architectural history."

Furthermore, the Future Land Use Map adopted in 2020 (page 12 goal 4) states that "The Town should preserve and enhance established neighborhoods by directing dense growth to multimodal and key transportation corridors [in order] to protect and preserve the Town's historic neighborhoods as well as its Neighborhood Conservation Districts."

Speaking of which, the Town defines Neighborhood Conservation Districts as "areas that contribute significantly to the overall character and identity of the Town, but may lack sufficient historical, architectural or cultural significance at the present time to be designated as a Historic District." Thus, NCDs are areas that merit *less* protection than official historic districts. Stated differently, historic districts are areas that merit *greater* protection than NCDs, because the former possess greater historical, architectural or cultural significance. It therefore defies both logic and common sense to exempt Neighborhood Conservation Districts, but not Historic Districts, from the proposed text amendments.

Finally, The Town staff memo to the Town Council dated April 10, 2023 concerning the Housing Choices for a Complete Community text amendments states, "Special consideration is needed to guarantee the continued preservation of local and National Register-designated historic districts." The proposed text amendments presented to the HDC at its May 9 meeting contain no such special consideration for the historic districts. The HDC's chief concern regarding the application of the proposed text amendments to the historic districts is that permitting the construction of multiplex housing on existing single-family lots close to campus will incentivize the demolition of historic homes, an outcome clearly at odds with the Town's historic preservation goals.

The recent experience of neighboring municipalities suggests the HDC's concern is well-founded. For example, in July 2021, Raleigh implemented text amendment changes similar to those being considered by Chapel Hill. Since this change, Raleigh's Historic Development Commission has received 6 requests for demolition of primary historic structures – approximately 3 per year. By contrast, in the 5 years prior to this change, Raleigh's HDC received only 7 requests for demolition – approximately 1 per year. This represents a 300% increase in the number of proposed demolitions. We are concerned a similar pattern will repeat itself in Chapel Hill, causing irreparable harm to the Town's cultural and architectural legacy, including not only to the physical structures but to the heritage represented by both former residents as well as crafts people who built these buildings.

In closing, we note that the Town Council recently recognized May 2023 as Historic Preservation Month in Chapel Hill. We urge you to carefully consider the long-term impact of this proposal and explore ways to better balance the community's housing needs with the preservation of our historic districts.