December 29, 2021

Chris Goglia, President

St. Armands Residents Association

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RE: The BID's proposed St. Armands Commercial Height Increase

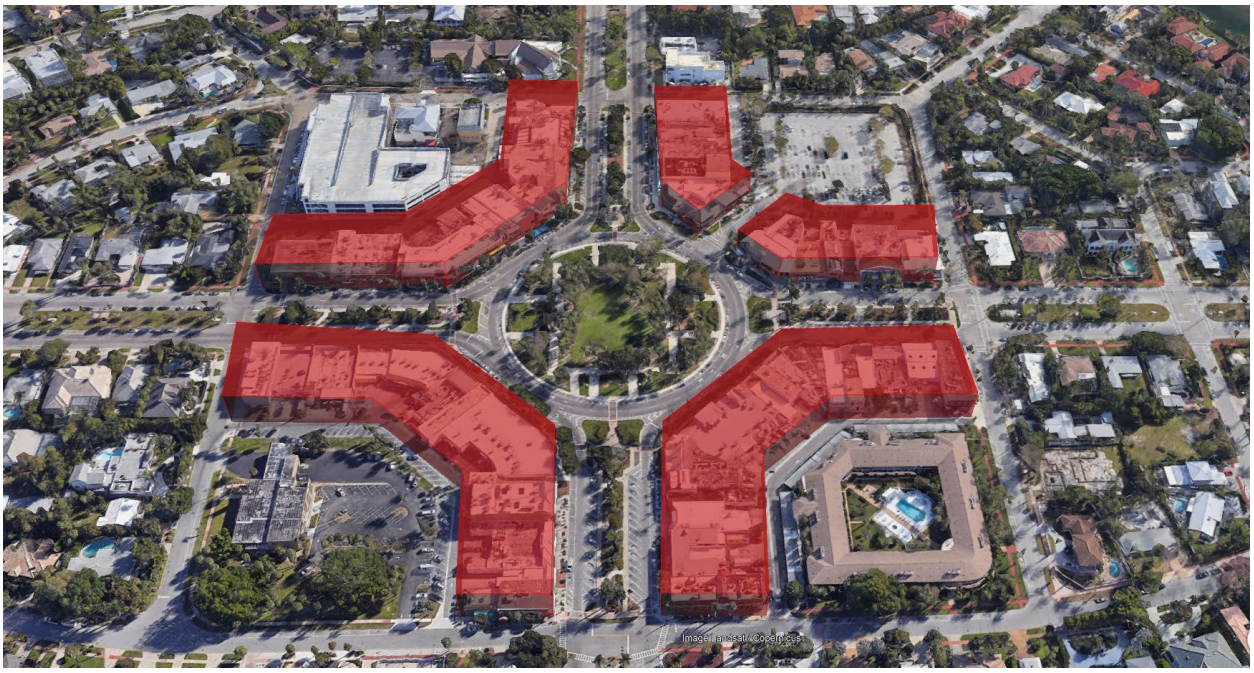
Dear Mr. Goglia,

First, I would like to inform you that there will be a second virtual community workshop that will discuss the height change and the CT zoning text amendments that are being proposed on January 11th, 2022. This will be open for the public to participate and provide feedback. We will be focusing on clarifying the questions you have proposed as well as others that were provided during the previous community workshop.

Here are my answers to the four questions you have:

1. The height of buildings in the city is measured from grade EXCEPT when the parcel is located in a flood zone. Then it is measured from the FEMA base flood elevation. The CT district is located in a flood zone and technically new structures need to be built above the base flood elevation; however FEMA has an exception allowing non-residential space that is dry floodproofed to be located below the base flood elevation. This was confirmed by the current director of Development Services. In addition, city staff is proposing a change to the Code that will clarify this and require buildings that are dry floodproofed and built at existing grade to have their building heights measured from grade and buildings that are not dry floodproofed and located above the FEMA base flood elevation would have their heights measured from the base flood elevation. Given this clarification, we will be modifying the text of our proposal to provide a maximum height of 45' measured from finished grade if the developer builds the structure at grade and dry floodproofs. If the developer locates the structure above the base flood elevation, then the maximum height will remain at 35' measured from the FEMA base flood elevation.

2. I do not have accurate measurements of current buildings on the Circle, however I have provided a number of 3D graphics showing the Google Earth building data with the proposed development height overlayed. We will also be providing additional graphics and information during our upcoming public workshop on January 11th. It is also worth noting there are a number of residential structures surrounding St. Armands Circle which are taller than the commercial buildings because they are located in a higher base flood elevation, are not allowed to dry floodproof the ground floor, and have been built to the maximum height. See below:



Red indicates the extent of the CT zoning district that will be subject to the change. Very few commercial spaces are actually adjacent to residential structures.

View from beach. Red indicates maximum height of new structures.

South Blvd. of the Presidents. Red indicates maximum height of new structures.

3. It would not be possible to build a four-story building at grade with the current height restriction. The City is clarifying in the Code that dry floodproofed structures located at grade will have their maximum heights measured from finished grade. This means that a current building has 35’ of height to build their development. Given standard construction methods for commercial spaces, a four-story building would have 12’ of commercial space on the first level and a minimum of 8’ of ceiling height on the next three levels. This adds up to 36’ of height without factoring in the thickness of slabs, and ceiling space for mechanical, electrical, and plumbing. It is also worth noting that the new development standards proposed in the CT zoning text amendment will be requiring a minimum of 12’ ceiling height on the first floor for commercial spaces.

4. It would not be possible to design a five-story building that would work within the new height limit given standard construction practices that provide space for mechanical, electrical, and plumbing between the ceiling and underside of the concrete floor slab. With a 12’ first floor ceiling and 8’ ceilings on the next 4 floors, a five-story building would require 44’ of height just for clear ceiling height. Then you would need four 8” concrete floor slabs, and a roof slab of more than 8” once you slope it for drainage. This would be over 47’ of total height without providing any ceiling space for mechanical, electrical, and plumbing.

I hope that this helps to provide answers to your questions. Please also remember to join us for the community workshop that will be held on January 11th where we will be providing additional information and diagrams as well as receiving feedback from the public.

Sincerely,

Daniel Lear | Principal

Lear Studio Architects