



PREPARED FOR THE URBAN DESIGN COMMISSION

Project Address: 33 W Johnson Street
Application Type: Planned Development for a New Mixed-Use Development
UDC is an Advisory Body
Legistar File ID #: [80306](#)
Prepared By: Jessica Vaughn, AICP, UDC Secretary

Background Information

Applicant | Contact: Andy Inman, NCG Hospitality | MC Investors I, LLC

Project Description: The applicant is proposing the redevelopment of the former Madison College site with a mixed-use development featuring a hotel, residential and commercial spaces. The development proposal includes repurposing the existing historic building into a six-story mixed-use residential building with 10,000 square feet of commercial space and the construction of an 11-story dual branded hotel tower with amenity spaces (approx. 17,000 square feet), including restaurants, rooftop lounge, underground parking, meeting/event space, and winter garden.

Project Schedule:

- UDC received an Informational Presentation on October 18, 2023 (Legistar File ID [80306](#)), which reflected development in a proposed Planned Development (PD) zoning district.
- UDC received an Informational Presentation on July 12, 2023 (Legistar File ID [78639](#)), which reflected development within the existing, conventional zoning district.

Approval Standards: While the subject site is currently zoned UMX (Urban Mixed Use District), the applicant is proposing to rezone the project site to Planned Development. The UDC is an **advisory body** on the Planned Development request. For Planned Developments the UDC is required to provide a recommendation to the Plan Commission with specific findings on the design objectives listed in Zoning Code sections 28.098(1), Statement of Purpose, and (2), Standards for Approval (PD Standards Attached), including, more specifically:

PD Standard (e), which generally speaks to coordinating “...*architectural styles and building forms to achieve greater compatibility with surrounding land uses and create an environment of sustained aesthetic desirability compatible with the existing or intended character of the area and the statement of purpose of the PD District.*”

PD Standard (h), which speaks to height in excess of that allows in the Downtown Height Map noting that “...*no application for excess height shall be granted by the Plan Commission unless it finds that all of the following conditions are present:*”

1. *The excess height is compatible with the existing or planned (if the recommendations in the Downtown Plan call for changes) character of the surrounding area, including but not limited to the scale, mass, rhythm, and setbacks of buildings and relationships to street frontages and public spaces.*
2. *The excess height allows for a demonstrated higher quality building than could be achieved without the additional stories.*
3. *The scale, massing and design of new buildings complement and positively contribute to the setting of any landmark buildings within or adjacent to the project and create a pleasing visual relationship with them.*

4. *For projects proposed in priority viewsheds and other views and vistas identified on the Views and Vistas Map in the City of Madison Downtown Plan, there are no negative impacts on the viewshed as demonstrated by viewshed studies prepared by the applicant.*

Adopted Plans: The project site is located within the [Downtown Plan](#) planning area, within the Downtown Core neighborhood. As such, development on the project site is subject to the [Downtown Urban Design Guidelines](#). The Downtown Plan (the Plan) recommendations for development in this neighborhood generally speak to encouraging the highest intensity of development in this subarea and encouraging a mix of uses that will help to retain the area's vibrancy. In addition, the Plan also includes specific recommendations related to building height and the overall design/treatment of Wisconsin Avenue as a premier street.

With regard to building height, the Plan notes key objectives in the evaluation of requests for additional stories, which include but are not limited to compatibility of scale, preservation of key view corridors, and respect for the unique individual Downtown neighborhoods and districts. The Plan states, *"...additional stories are to be used as a tool to encourage and reward buildings of truly exceptional design that respond to specific context of their location and accomplish specific objectives defined for the area."*

In addition, as noted on the Downtown Plan Height Map, the project site is located within Additional Height Area G, which is noted as *"...a transition area between the Downtown Core, with the tallest allowed buildings in the planning area, and the Mansion Hill Historic Districts, with a five-story height limit."* The Plan recognizes that taller buildings than what are present now would be appropriate.

At eleven stories/132 feet, the hotel tower is not consistent with the maximum height limitations as enumerated in the Zoning Code and Downtown Plan. Current standards include a base height of eight stories/116 feet, with up to two possible bonus stories available for a maximum height of up to 10 stories/144 feet. Planned Development Zoning is the allowable process to request height beyond that in the Zoning Code.

With regard to Wisconsin Avenue, the Plan identifies it as a Premier Street, which are intended to be designed with the highest level of design and amenity, including many characteristics of "complete streets" which are designed to host all users, including bicycles, pedestrians, and vehicles. Currently, Wisconsin Avenue includes metered on-street parking, tapered medians, sidewalks and very wide, embellished terraces with mature trees. In addition, the Downtown Urban Design Guidelines specifically speak to site access and circulation, noting that one of the primary goals is to maximize uninterrupted pedestrian access within a given block and more specifically, the guidelines state: *"Porte-cochere type entries, drop-offs or circular drives should not be parallel to the street or within the right-of-way, nor should they be oriented to require more than one curb cut."*

Summary of Design Considerations

Staff recommends that the UDC provides feedback, make findings and a recommendation to the Plan Commission on the development proposal. As part of the UDC's review, consideration should be given to the aforementioned standards, including but not limited to those PD standards related to excess height, the adopted plan recommendations, and Downtown Urban Design Guidelines, etc. as it pertains to the design-related considerations noted below. Staff requests the Commission address the following items in their recommendation to the Plan Commission.

- **Overall Building Height.** As noted above, the proposed PD includes a height exception request to exceed the maximum permitted height under the existing UMX zoning (10 stories/144 feet) at 11 stories/132 feet. Staff requests the UDC provide feedback, make findings and a recommendation related to the proposed building height as it relates to the objectives noted above in the Downtown Plan and PD Standard (h) related to achieving additional height, including those that speak to sensitivity to context, exhibiting a truly exceptional design, and creating appropriate transitions.

As noted by the Commission in their Informational Presentation comments, generally the height seemed appropriate as an 11-story building within the permitted height of a ten story building.

- **Site Access and Circulation.** First, staff notes that significant changes have been made to move vehicular access improvements out of the public right-of-way onto the site, resulting in what staff believes is an improved design. With that, two curbcuts remain providing vehicular access to the hotel entrance on Wisconsin Avenue. Staff notes that the Downtown Urban Design Guidelines regarding site access and circulation one of the primary goals is to maximize uninterrupted pedestrian access within a given block. More specifically, *“Porte-cochere type entries, drop-offs or circular drives should not be parallel to the street or within the right-of-way, nor should they be oriented to require more than one curb cut.”*

Staff requests the Commission provides feedback, findings and a recommendation on the revised entry sequence and design elements along Wisconsin Avenue related to the noted applicable guidelines. Consideration should be given to the entry orientation and the mass/scale of architectural design elements, creating an enhanced design aesthetic at the pedestrian level, minimizing the proposed vehicular amenities and driveways to be the minimum necessary to provide vehicular access, creating a free and clear pedestrian zone, treatment of public spaces, landscape treatment, screening and buffer, maintaining mature landscaping, etc. While the UDC does not approve modifications or improvements in the right-of-way, the Design Guidelines specifically address this subject and such modifications to the entry sequence will impact the on-site design.

In addition, consideration should be given to the Commission’s Informational Presentation comments, which generally expressed concern regarding the impacts to the iconic view along Wisconsin Avenue.

- **Building Design and Composition.** Staff requests the Commission provides feedback, and make findings and a recommendation on the overall building design and composition, including as it relates to the adopted design guidelines and those that generally speak to creating a cohesive architectural expression. Consideration should be given to the overall building proportions and articulation, mass/scale of building components, size and rhythm of windows and detailing, especially those on the upper floors of the hotel building on the Carroll Street elevation, building and entry orientation, ground level activation on all street frontages, including the integration of the proposed roll-up doors on W Johnson and Dayton Streets, minimizing blank walls (including those shown on the northwest perspective visible from W Johnson Street), creating positive termination at the top of the building, and creating a successful transition between the hotel and residential buildings, etc.

In addition, consideration should be given to the Commission’s Informational Presentation comments:

- Utilize the same window patterns, treatments and detailing, especially at the corner of Dayton and Wisconsin,
 - Utilizing pops of color to celebrate the curves,
 - Incorporating and/or lightening the material palette to provide more within the palette,
 - Creating two buildings that look like different hotels, including extending the unique identity of the Autograph hotel along Dayton so that it does not look like the Residence, and
 - The Commission requested that the site context be included in the renderings.
- **Building Materials.** As noted in the application materials, the preliminary material palette is comprised of masonry, glass, and metal panel materials. As noted in the Downtown Urban Design Guidelines, *“An integrated palette of high quality, durable building materials can enrich the pedestrian environment through the use of scale, color, texture, and architectural details.”* Staff requests that the Commission provide feedback, findings and a recommendation on the proposed material palette and composition, especially as it relates to creating an enhanced design at the pedestrian level, including those guidelines

that generally speak to creating visual interest, exhibiting a richer of architectural detailing, as well as color, texture and maintaining transparency.

- **HVAC Louvers.** While not shown on the elevations, consideration should be given to potential HVAC/VTAC louvers, which are commonly associated with lodging uses. It has been the current practice to not locate such units on street facing facades, though they have been approved in some situations when found to be well integrated into the façade's design. Given the prominence of the location and proposed height of the building, consideration should be given to the location and visibility of such elements. Staff requests the Commission's feedback, findings and recommendation on the potential HVAC/VTAC louvers/wall pack units.
- **Long Views.** Due to the prominence of this site along the outside loop of the Capital Square spanning several heavily trafficked thoroughfares in the Downtown Core, including Wisconsin Avenue, W Johnson Street and Dayton Street, consideration should be given to the overall composition of the building as part of the overall cityscape and how it will read from a distance. While some longer views were provided in the application materials, a complete composition of the proposed building and existing building from the distance was not provided.

As noted in the Downtown Urban Design Guidelines, a similar design composition and quality of materials should be used on all sides of the building. Staff requests the Commission's feedback, findings and recommendation on the proposed treatment of the less articulated walls, especially those along Dayton and W Johnson Streets, and the exposed upper floors of the proposed hotel building, in particular the northwest elevation, especially as it is seen from a distance.

- **Landscape.** As noted in the Downtown Design Guidelines, landscape designs should be focused on creating an "urban" landscape that not only is context sensitive but that also that softens hard edges. As such, consideration should be given to incorporating site amenities (i.e. planting beds, seat walls, street furniture, public art, lighting, and landscape materials, etc.) in combination with plant species that are compatible with an urban environment and that provide year-round texture and color. Staff requests the Commission provide feedback and a recommendation on the proposed landscape plan.
- **Lighting.** While a full photometric plan was not included in the submittal materials, fixture cutsheets and a night rendering were submitted. In reviewing the lighting information, staff has concerns regarding some of the proposed fixtures, including those fixtures that are denoted as uplights and light strips both in terms of meeting cutoff requirements and mounting techniques that ensure the proposed fixtures are integrated into the architecture. While on balance, staff is confident that the proposed lighting can meet code requirements, staff notes, and the applicant is advised, that additional information is required in order for a complete review to be completed, including a photometric plan and mounting details. As such, staff recommends the Commission address lighting as part of their formal action, giving consideration to whether the review of additional lighting information could be completed administratively by staff or if additional review by the UDC is required.
- **Projections into Capital View Height Limit.** In addition, with regard to building height, as noted in the application materials, the proposed mechanical screening stair and elevator overrun will project into the Capital View Height Limit. Pursuant to [MGO 28.134\(3\)](#), limited projections, including elevator overruns may be permitted encroachments when approved as Conditional Uses. Please note, such projections can only be approved by the Plan Commission, though the UDC can provide advisory comments as it relates to the overall building design. As such, staff requests the Commission's feedback, findings and recommendation on the proposed projections into the Capital View Preservation Limit. Consideration should be given to the Downtown Urban Design Guidelines, especially those that speak to minimizing the

encroachment, utilizing appropriately-scaled elements, including screening materials, integration into the overall architectural composition, and providing appropriate screening to conceal the elements.

Staff notes that limited information was presented in the submittal materials related to the height of the rooftop mechanical equipment, elevator and stair tower overruns, screening materials, and extent of the encroachment.

Summary of UDC Informational Presentation Comments

As a reference, the Commission's comments from the October 18, 2023, Informational Presentation are provided below.

The Commission had the following questions for staff and the development team:

- This is all over the place, but when you start to look at it, it has this abstract artistic, Frank Gehry thing to it, the architecture, I like that. I like that it's at the corner. Like the previous project, there are some things that don't play well together. If you are going to look at, there is a chaotic corner, Wisconsin and Dayton, which is not bad, but both sides should counter each other, complement each other, have the same window treatments, same glazing patterns, canopies, etc. Don't have three different things, have two and let your corner do all the work for you. You have this metallic beige extended mullion, and it stops, but the plane...keep the same treatment. Have that recessed piece be the same language, which is breaking up that corner from your punched opening side. It will start to bring attention to the corner piece, which is what you want people to focus on. There's still some greenspace there, within the property lines. I'm okay with it, it's different but I think it's time for some different stuff happening, everything is starting to look the same.
- I have to say I really like the changes you made. The merging of the two separate hotels works so much better. I thought that was a handsome building, but it looked like a completely different building and now they are working together a lot better. From a ground level this will be so much more pedestrian friendly. The changes you made with the traffic patterns are an improvement too. Addressing some of the comments from the neighborhood, how many units are in the combined hotels and how many parking spaces do you have on site?
 - Very close to 330 on both hotels, combined. Parking is about 140 on-site parking stalls.
- I am gathering the complaint is that you're looking at using the neighboring public ramp?
 - We're working with the Parking Utility, they monitor the occupancy of all the structures. Revenues are very much down. We've got good history now with the AC Hotel. Even when we're fully occupied we have numbers of how many guests are driving, and that number in general is declining. More people are getting to hotels via rideshare or other means. We share the concern of making sure there is ample parking.
- It is a concern, as somebody who has been a victim to sold-out nights and Orpheum and Overture, and there is no hotel there now, I can appreciate what it will be like when there is a hotel there.
- I too have concerns about the front of the building and that iconic view of Wisconsin Avenue. I don't know where the City's at as far as trying to protect those Ash trees, everybody wants to write them all off but in reality you can protect and treat them. I can appreciate that two of those may have to go; whatever lengths you can go to so Wisconsin Avenue is a tree lined alley. That might involve getting trees bigger than 2.5 caliper.
- It looks like the design has improved. Using the City right-of-way is a no-go. You can't solve your drop off on City property, I personally won't support it even if you make other design improvements. It's a premier street which should not be used for the purpose you have here. There are some other things in the staff report I'm seeing but I don't have comments on them.
- That is going to be the big challenge for this Commission, to make a finding that this project is in conformity with the Downtown Design Guidelines that talk about this being a premier street, tree canopies, one curb cut, no drop-offs. Making an advisory recommendation to the Plan Commission talks about compatibility with existing or planned character of the street, and the height as well. We mentioned that being a huge concern the last time you were here. It's not a whim of this Commission, it's a written plan that we have to make a finding of being in compliance with. Stretching things 180 degrees is really tough. I'm concerned about the Commission being able to make a finding that this is in conformity with those plans.

- Based on what you read, the language of the Wisconsin Avenue, it's not. And those are up there. I don't think that says no to the project, it tells the architect what you have to do before you come back. Bring your site into compliance so your project can be approved. The architecture can't solve all the site issues.
- It's a very difficult problem, we've seen two other projects here. We're also going to be asked to approve bonus stories, which says "this project is great," and what do we get? A project that ignores a stated plan on a premier street.
- I agree about the Wisconsin Avenue concerns. The building reads very dark in your renderings, what are those materials?
 - The palette is masonry, we're responding to the Madison College buildings, we want something that is rich so we have a dark base. We're still fine tuning the brick color. Masonry metal panel, a lot of glass, a darker metal mullion. We're still planning the final palette and would love to hear thoughts on that.
- (Referring to Slide 32) As we're seeing more buildings get taller downtown, color is becoming more important, and the issue of just dark versus light is becoming more important. I hope you might look at this tower, there are so many exciting things happening in there, curves, horizontal lines as opposed to the verticality we see downtown. As you move forward on that element maybe it deserves color to celebrate those curves. The way those horizontals are celebrated are unique and different, but you're going against it with so many vertical fins. Color is subjective but I would make an argument that dark colors downtown are hard, I hope you might revisit that and also celebrate your curves more.
- I would like to expound on what Jessica said there. This is generally Residence Inn, this is Autograph, then I come around and it almost looks like more of a Residence Inn. If Autograph is the trendy expression, why don't you continue this type of expression all the way around to and down Dayton and have two hotels that really are distinct from each other, and two buildings that look like two different hotels.
 - We wanted the palette throughout the building to stitch together but show uniqueness. We wanted to make sure we celebrated the corner, but soften the design as you move towards the historic building.
- Why not extend the corner a little further and have a more slender "quiet" zone? You could bring out that corner and make a statement that this is a different hotel than anything else we have in town.
 - There's a lot going on here, the historic, but bird glass is the other one. If we were to stretch more glazing we start to push up against the bird glass percentages.
- You've made improvements, the Johnson corner is much better. I like the comments about introducing color to this pretty dark palette. My first reaction was this is really heavy, really dark. There is still a synergy lacking between the different pieces, there's still some competition happening, I don't know if it's the cap, my eye wants to go up to those caps but it's also competing with the architectural focal point at the corner, which I think is awesome. It's hard to pinpoint, but to me it's still lacking some kind of cohesive synergy between those two sides.
- I will echo what Alder Rummel said that Wisconsin Avenue is a non-starter, to ignore or try to justify the departure from the Downtown Design Guidelines. I'm not so sure if it's the setback issue, I know it's very important as you look at the progression of setbacks all the way up Wisconsin Avenue, but the line in the sand is the right-of-way and the new driveways being introduced, unfortunately it's a non-starter. As far as the trees on Wisconsin Avenue, I know they are treating some of those Ash trees, but some more stately trees in the long run would be better so the loss of two isn't the worst thing in the world. I appreciate this is the second Informational Presentation, I know it's a challenging site.
- I also wanted to show appreciation for the silva cells and some more stately street trees, which will be necessary.
- The height is another issue. Personally I think there could be a path to allowing an 11th floor, being within the height of a permitted 10-story building, and I prefer it because lower floor to floor means less

space between the sill and head of the window for a much lighter appearing building. Are there any adjacent landmarks?

- (Secretary) Bethel Lutheran Church, the Masonic Temple. Within the same block but not directly adjacent to the project site.
- The Johnson Street side of the building is vastly improved.
- I think the height is appropriate. Architecture is not supposed to be, this is a downtown area, it's asking for dynamic design. It has to conform with some of the ordinances, but I think there are fixes for the site without changing the building design. I think the building design works if the site issues are fixed. I don't mind the black architecture, and I don't mind pops of color in there, but it could be more dynamic with colors, some color in there to accent the curves.
- In a city of brown and beige you definitely stand out – to the bird glass point...
 - We are complying with that, yes.
- In thinking about dark colors versus light – the heat impact is something to think about. The roof is something to think about...white roofs?
 - We have the roof plan in the packet, much of it is occupied with terraces and outdoor spaces for the Residence Inn and rooftop restaurant. Plantings, pavement, furniture and mechanicals.
- Aren't there things like white roofs? Maybe that's a way to address heat index concerns.
 - We've done both in previous projects.
- I frequently concur that the dark masonry downtown is overwhelming. It doesn't matter what time of day or season, when you go around the corner at the James it feels like a canyon. I don't get that effect from this one, it will play a whole lot differently on this block. Masonry has to be some color, it would look cornier to tie it into the old MATC building, when you had a lighter tan color it looked like a different building. In this case I think it's an attractive use of it, there's a lot of other very light colored buildings around, there is something to be said for the dynamic black and white thing going on. Having said that I definitely agree that the darkness of not just the masonry but other materials are hiding the dynamism of those curves. Whatever you can do help those stand out, it's the architectural feature of certainly that corner and in large part this project, to have them disappear into darkness is a big mistake.
- When you were here before you shared context photos, the actual photos of realized projects brought a depth and shine to these materials, they weren't actually that dark in reality. If you could show us the reality of it, it would help us get past some of these less-finer renderings.
- Put the actual context in the renderings instead of the white boxes.

ATTACHMENT
PD Zoning Statement of Purpose and Standards

28.098 (1) Statement of Purpose.

The Planned Development (PD) District is established to provide a voluntary regulatory framework as a means to facilitate the unique development of land in an integrated and innovative fashion, to allow for flexibility in site design, and to encourage development that is sensitive to environmental, cultural, and economic considerations, and that features high-quality architecture and building materials. In addition, the Planned Development District is intended to achieve one or more of the following objectives:

- (a) Promotion of green building technologies, low-impact development techniques for stormwater management, and other innovative measures that encourage sustainable development.
- (b) Promotion of integrated land uses allowing for a mixture of residential, commercial, and public facilities along corridors and in transitional areas, with enhanced pedestrian, bicycle and transit connections and amenities.
- (c) Preservation and enhancement of important environmental features through careful and sensitive placement of buildings and facilities.
- (d) Preservation of historic buildings, structures, or landscape features through adaptive reuse of public or private preservation of land.
- (e) Provision of more adequate, usable, and suitably located open space, recreational amenities, and other public facilities than would otherwise be provided under conventional land development techniques.
- (f) Facilitation of high-quality development that is consistent with the goals, objectives, policies, and recommendations of the Comprehensive Plan and adopted neighborhood, corridor or special area plans.

28.098(2) Approval Standards for Project

The standards for approval of a zoning map amendment to the PD District, or any major alteration to an approved General Development Plan, are as follows:

- (a) The applicant shall demonstrate that no other base zoning district can be used to achieve a substantially similar pattern of development. Planned developments shall not be allowed simply for the purpose of increasing overall density or allowing development that otherwise could not be approved unless the development also meets one or more of the objectives of (1) above. Conditions under which planned development may be appropriate include:
 - 1. Site conditions such as steep topography or other unusual physical features; or
 - 2. Redevelopment of an existing area or use of an infill site that could not be reasonably developed under base zoning district requirements.
- (b) The PD District plan shall facilitate the development or redevelopment goals of the Comprehensive Plan and of adopted neighborhood, corridor or special area plans.
- (c) The PD District plan shall not adversely affect the economic health of the City or the area of the City where the development is proposed. The City shall be able to provide municipal services to the property where the planned

development is proposed without a significant increase of the cost of providing those services or economic impact on municipal utilities serving that area.

- (d) The PD District plan shall not create traffic or parking demands disproportionate to the facilities and improvements designed to meet those demands. A traffic demand management plan may be required as a way to resolve traffic and parking concerns. The Plan shall include measurable goals, strategies, and actions to encourage travelers to use alternatives to driving alone, especially at congested times of day. Strategies and actions may include, but are not limited to, carpools and vanpools; public and private transit; promotion of bicycling, walking and other non-motorized travel; flexible work schedules and parking management programs to substantially reduce automobile trips.
- (e) The PD District plan shall coordinate architectural styles and building forms to achieve greater compatibility with surrounding land uses and create an environment of sustained aesthetic desirability compatible with the existing or intended character of the area and the statement of purpose of the PD District.
- (f) The PD District plan shall include open space suitable to the type and character of development proposed, including for projects with residential components, a mix of structured and natural spaces for use by residents and visitors. Areas for stormwater management, parking, or in the public right of way shall not be used to satisfy this requirement.
- (g) The PD district shall include suitable assurances that each phase could be completed in a manner that would not result in an adverse effect upon the community as a result of termination at that point.
- (h) When applying the above standards to an application for height in excess of that allowed in Section 28.071(2)(a) Downtown Height Map, except as provided for in Section 28.071(2)(a)1. and Section 28.071(2)(b), the Plan Commission shall consider the recommendations in adopted plans and no application for excess height shall be granted by the Plan Commission unless it finds that all of the following conditions are present:
 - 1. The excess height is compatible with the existing or planned (if the recommendations in the Downtown Plan call for changes) character of the surrounding area, including but not limited to the scale, mass, rhythm, and setbacks of buildings and relationships to street frontages and public spaces.
 - 2. The excess height allows for a demonstrated higher quality building than could be achieved without the additional stories.
 - 3. The scale, massing and design of new buildings complement and positively contribute to the setting of any landmark buildings within or adjacent to the project and create a pleasing visual relationship with them.
 - 4. For projects proposed in priority viewsheds and other views and vistas identified on the Views and Vistas Map in the City of Madison Downtown Plan, there are no negative impacts on the viewshed as demonstrated by viewshed studies prepared by the applicant.
- (i) When applying the above standards to an application to reduce or eliminate setbacks required by Section 28.071(2)(c) Downtown Setback Map, the Plan Commission shall consider the recommendations in adopted plans, including the downtown plan. No application to reduce or eliminate setbacks may be granted unless it finds that all of the following conditions are present:
 - 1. The lot is a corner parcel.
 - 2. The lot is not part of a larger assemblage of properties.
 - 3. The entire lot is vacant or improved with only a surface parking lot.
 - 4. No principal buildings on the lot have been demolished or removed since the effective date of this ordinance

