

PARTNERSHIP *for* SMARTER GROWTH

Dear Mayor Stoney, the Richmond City Council, and Richmond Planning Commission:

The proposed Richmond 300 final plan is now before the Planning Commission for a hearing on Monday, October 5th, and will soon be before the City Council for review. This plan, once adopted, will set the course for our city for years to come. While the Partnership for Smarter Growth (PSG) commends the Planning Department and advisory commission for the development of a high quality plan, with excellent analysis, detailed recommendations, and a strong vision for urbanism, sustainability, and equity, and we broadly support the plan, we have some important remaining concerns and requests.

Amendment to support inclusionary development:

The plan describes the city staff initiating broad area rezonings to the densities and heights outlined in the plan for each place type. We have repeatedly shared our concern that this approach gives up the opportunity for the city to create incentives for developers to provide community benefits, particularly affordable housing. Upzoning land through city-initiated rezoning creates a windfall in value for the private sector landowners, many of whom have held onto vacant or underutilized land for years, at a very low basis.

With the Mayor, Council and candidates focused on affordable housing, the city will need to use every tool for affordable housing:

- **The plan (and subsequent rezoning) should specifically call for reserving some height and density in the new zoning categories so that the city can use density bonuses to incentivize inclusion of affordable units, and provide for other community benefits including public plazas and park spaces as part of development projects.**
- **The city should seek General Assembly clarification of the city's authority to use inclusionary zoning as a top priority in its legislative agenda, but in the meantime must incorporate our recommended amendment in the Richmond300 plan, because now is the time to signal to the the private sector that the city will be fully incorporating inclusionary zoning.**

Amid the spotlight on the inequities in our city, placing affordable housing in the forefront of the plan, and ensuring new development is inclusive, must be a priority.

Amendment to remove proposed downriver bridge:

We expect that few people, including the residents of eastern Henrico County, realize that included in the proposed transportation plan is a new bridge between I-95 and Route 5, slicing through Tree Hill Farm. Based upon our research and inquiries to the planning staff, it appears that the above referenced bridge and associated I-95 interchange were mentioned only in the form of an icon on the “Future Connections” map.

We noticed the arrow icon during our review of the draft plan and checked with the staff at the Department of Planning and Development Review. Staff stated that both the new interchange and the new river crossing were vetted by the community, and that they had been included on the “Future Connections” maps dating back to Community Consultation #2, and that the need for such a project was established through internal study and deliberation. Subsequently, the staff added a small paragraph to the pre-final plan on the planned infrastructure, with little to no explanation of how or why this was selected for inclusion in the master plan.

However, from our review and the input of Trip Pollard who served on the Richmond300 Transportation Workgroup, we cannot verify that a project of this significance was called out in any public meeting. We alerted our partners in the Route 5 Corridor Coalition based in Henrico County and they were not aware of the proposal and indicated that this bridge is not in Henrico County’s comprehensive plan.

Such a large investment with long-term implications for the future of our region’s transportation network calls for a more deliberative public engagement process, and a more robust justification. The construction of a new interchange along I-95, and a new river crossing adjacent to it, would have severe implications for both Richmond’s South Side, where we would expect to see industrial truck traffic increase, and for Eastern Henrico, where development pressure would be expected to increase. The residents of Eastern Henrico, particularly along the historic Route 5 Corridor, have made it clear that they seek to limit the variety of sprawling, auto-centric development that characterizes the western portion of the county, and [Henrico’s comprehensive plan](#) makes no reference to any of the supporting infrastructure that would be needed to accommodate this new interchange and river crossing.

For those who say that this is just a “concept,” experience shows that when a controversial transportation segment is drawn on a map, it is rarely if ever removed, and becomes the focus of those seeking to open up new areas for development.

- **We strongly urge you to remove the proposed bridge from the plan.**

Amendment to strengthen our vision for transit:

The transit recommendations should be strengthened and made more specific.

- Instead of referring just to “enhanced transit,” the plan should specifically call for an expanded network of dedicated lane bus rapid transit along higher density corridors and

between growth nodes, and propose future higher capacity transit when the city's growth, population and density warrant, which could include streetcar and/or light rail.

The level of growth envisioned for the city and along key corridors is significant, and will need to be supported by frequent, high-capacity transit in addition to the bicycle, pedestrian, and demand management measures proposed in the plan.

Amendment to more fully incorporate Shockoe Bottom small area plan:

Late amendments to the plan by the staff added a new Destination Mixed-Use planning category for Shockoe Bottom with 5 story minimum height and no maximum, in part due to requests by landowners. However the development of a small area plan is still in progress and should be the governing plan for Shockoe Bottom.

The Richmond 300 plan states that the city will "rezone in alignment with the Future Land Use Map...". While it also states that the city will "Complete and adopt the Shockoe Small Area Plan," it does not specify that the Shockoe Area Plan will be adopted as an amendment to the Richmond 300 plan and is intended to govern the future of Shockoe Bottom. It does not state that the Future Land Use Map will be amended based on the Shockoe Area Plan. Furthermore, if the city will "rezone in alignment with the Future Land Use Map," as shown in the current Pre-Final Plan, then this could preempt the Shockoe Area Plan and include the possibility of unlimited height and do so without the tools needed to achieve community benefits, such as the setting aside of public commemorative spaces on sites of former slave jails. Destination mixed-use with unlimited height may not be the best tool when the community is trying to negotiate the right balance between commemorating the tragic history of Shockoe Bottom and new development.

In an adjacent caption, the Richmond 300 plan states that "The City is developing a Small Area Plan for Shockoe under the guidance of the Shockoe Alliance. The Shockoe Alliance's mission is to guide design and implementation of concepts and recommendations for the future of Shockoe as a holistic area rooted in history and informed by those with shared interests to advance these efforts in support of the mission."

- **This language is inadequate and should be amended to say "The City is developing a Small Area Plan for Shockoe. This small area plan will govern the future of Shockoe. It will be adopted as an amendment to the Richmond 300 Plan and Future Land Use Map, refine the heights permitted in Shockoe, and guide the follow-on rezoning."**

Historic Libby Hill Viewshed:

Scenic Virginia, the Church Hill Association and other organizations have fought to protect the viewshed from Libby Hill Park for at least two decades, including during the development of 2008-2009 Downtown Master Plan and the follow-on Riverfront Plan. The planning staff has been working with the community on a proposed viewshed overlay, an excellent 3-D computer visualization, and to define building heights. While the viewshed overlay is proposed for a sector

looking directly out from Libby Terrace and downriver, we have also learned recently that to the west the Virginia Department of Historic Resources holds an historic easement to protect the St John's Church Old and Historic District and the Tobacco Row historic district -- guiding appropriate heights along Main Street and in the front of Tobacco Row. The plan sets much of the area as Corridor Mixed use at 2 to 10 stories but it does not provide specific reference to the viewshed overlay or the easement.

- **We urge an amendment to incorporate both the viewshed overlay and the easement as determining the appropriate heights and locations for development.**

Even before the pandemic, Libby Hill Park was becoming one of the most popular places for city residents, county residents, and tourists, with people representing all walks of life, and enjoying the views both downriver and of our city upriver. Viewers of evening sunsets to the west during the summer have often matched the daily numbers looking downriver. Since the pandemic this park and its views have become even more important to people seeking beautiful and healthy outdoor spaces.

Conclusion:

We have a wonderful city, and the Richmond 300 plan will on the whole set us on a course to make continued economic, social and environmental progress. However, to achieve our equity goals particularly with regard to affordable housing and addressing the terrible stain of slavery in our city, we strongly urge that the plan adopt the approach to rezoning and to the Shockoe Valley small area plan that we have outlined. In addition, the city should not endorse a downriver bridge that could siphon economic investment, harm the tourism value of our historic and scenic eastern gateway, and add truck traffic to Southside. The city must also commit to a strong and specific plan for frequent, high-capacity transit. Finally, the city should capitalize on another of its great community and tourism assets by incorporating the viewshed overlay and historic easement as guidance for development and heights in the viewshed of Libby Hill.

We urge the adoption of the five amendments, which are in keeping with the stated goals of the plan related to equity, affordable housing, sustainability, historic preservation and commemoration.

Thank you for your consideration of these important issues, and for your service to our community.

Sincerely,
The Partnership for Smarter Growth

