

Markham, Lory P. - PDR

From: Ebinger, Matthew J. - PDR
Sent: Friday, January 16, 2015 10:45 AM
To: Mitchell, Gary D. - DPU
Cc: Markham, Lory P. - PDR
Subject: RE: Adams Park - Sec 3 & 4

Thank you, Gary, for getting back to me so quickly.

Matthew J. Ebinger, AICP

Senior Planner - Land Use Administration | Secretary to the Public Art Commission | Department of Planning & Development Review | City of Richmond | 804-646-6308

From: Mitchell, Gary D. - DPU
Sent: Friday, January 16, 2015 10:37 AM
To: Ebinger, Matthew J. - PDR
Subject: RE: Adams Park - Sec 3 & 4
Importance: High

Matthew,

Generally, since this is a subdivision requirement it should not be an issue. However my opinion is that since this development is in an MS4 area and the developer meets all MS-19 standards **there should be no additional impact.**

Gary

From: Ebinger, Matthew J. - PDR
Sent: Friday, January 16, 2015 10:20 AM
To: Mitchell, Gary D. - DPU
Subject: Adams Park - Sec 3 & 4

Good Morning Gary:

We spoke about this project about a week or so ago, specifically about the applicant's desire to have sidewalk on only one side of the subdivision's streets. It is staff's position that sidewalk should be placed on both sides of the street, as required by the Subdivision Ordinance.

Can you confirm that the amount/impact of runoff generated by impervious surface from sidewalks on both sides of the street would not be significantly more than the amount/impact of runoff generated by impervious surface from sidewalks on one side of the street.

Thank You,

Matthew J. Ebinger, AICP

Senior Planner | Land Use Administration
Secretary to the Public Art Commission
Department of Planning and Development Review
City of Richmond | 900 E Broad Street, Room 511
Richmond, VA 23219 | 804-646-6308



Green Infrastructure Center

Ms. Lory Markham
Secretary to the Planning Commission
Department of Community Development
900 East Broad Street, Room 511
Richmond, Virginia 23219

Dear Members of the Richmond City Planning Commission,

As someone who has been a planning commissioner for a city and a county, I appreciate the difficult challenges you face in making tough choices about whether or when grant an exception. However, the case for a sidewalk waiver, road widths etc. requested for Subd. No. 2015-01: Preliminary approval of the Adams Park Subdivision, Sections 3 & 4, at 5107 Kenmare Loop for 81 lots, represents an exceptional circumstance for which waivers should be granted. We have identified this site as a significant habitat area using the Virginia Natural Landscape Assessment tool created by the Virginia Division of Natural Heritage. We also authored a report for strategies to re-green the city and we worked with the Richmond Department of Public Utilities to create demonstration sites for stormwater pollution reduction. You can download our reports and read about our work at <http://www.gicinc.org/Richmond.html>

As you are aware, you have already allowed the developer to change his original proposal by allowing smaller lots in order to protect a significant portion of mature hardwood forest along the currently impaired Falling Creek Reservoir. This is in keeping with the city's master plan for the area which calls for "The Housing Opportunity Area located west of Ironbridge Road and south of the Brookbury subdivision near the Chesterfield County line (also located partially located in a Chesapeake Bay Preservation Area) contains one of the few natural areas remaining within the City limits. In order to provide incentives to protect a significant portion of the site and allow it to remain in a natural setting, a higher residential density should be allowed."

While you have already allowed smaller lots on this site to protect the woodland habitat and the water, more can be done to decrease impacts from impervious surfaces on this site. This is not only important for this site but also for the City. Richmond is under a consent decree with the EPA to reduce storm sewer overflows and you are also working to meet TMDL goals for both locally impaired streams (e.g. the impaired Falling Creek Reservoir which borders this site) as well as city wide requirement to meet the Chesapeake Bay Watershed Improvement Plan Goals for reducing nitrogen, phosphorus and sediment.

A key tool in reducing pollution of our surface waters is in reducing stormwater runoff. While it is true that the developer will apply stormwater management technologies to capture runoff, **the single most effective tool to prevent impacts from urban runoff is to reduce the source of the runoff.** While we can seek to replicate the pre-development hydrologic regimes, we cannot in fact do this. While we can capture and slow runoff to reduce peak flows and we can use various low impact development strategies to filter pollutants, we do not have the ability to prevent all harm. **Remember that low impact development is NOT no impact development.**

Regarding public safety, recall that none of the streets in this development are through streets and most end in a cul-de-sac. Traffic volumes are low and having a sidewalk along at least one side allows all residents to safely traverse the neighborhood. Lastly, section 2 and the previously approved 3 and 4 had sidewalks on only one side. Only section 1 had them on both sides. Adding this standard to the last section of development strikes us as arbitrary and capricious. While this developer is asking you for an exception, the reason he is asking for it is compelling. While staff may feel that one extra sidewalk or paved area here and there do not amount to much, ask yourselves why the James River and the Chesapeake Bay are impaired and under federal clean up orders -- it is death by a thousand paper cuts. Let us take one unnecessary paved area out of the equation. The neighborhood will remain walkable and attractive and less runoff will occur. **Reduce** is the first principle of harm avoidance. Let us take this small but simple step. Thanks for your consideration.

Sincerely,

Karen Firehock, Executive Director