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Cyane B. Crump

July 13, 2020

**Via Electronic Mail: richmond300@richmondgov.com,
mark.olinger@richmondgov.com, and
Maritza.pechin@richmondgov.com:**

Richmond 300 Project Team
Dept. of Planning & Development Review
City of Richmond
900 E. Broad Street, Room 511
Richmond, VA 23219

Re: Draft Richmond300 Master Plan

Ladies and Gentlemen:

Thank you for the effort you have devoted to producing the June 2020 draft Richmond 300 Master Plan. We are grateful for the time, energy and thought that you, the Advisory Council and many members of the community have devoted to producing this draft of the city-wide master plan for the City of Richmond.

We have participated in the Richmond 300 process by attending countless community meetings and workshops, submitting detailed comments to the July 25, 2019 draft of the master plan vision, goals and objectives, and through the service of one of our staff members, Cyane Crump, on the Richmond 300 Advisory Council.

We support the City-Wide Vision

We support the overarching City-Wide Vision for a "welcoming, inclusive, diverse, innovative, and equitable city of thriving neighborhoods; ensuring a high quality of life for all."

We note that this vision is not articulated until page 19 of the draft plan and recommend that an introductory statement be included at the very beginning of the plan that makes more explicit how this plan is intended to fulfill this vision and address historic issues of equity and inclusion in our city.

In this regard, we also note that in focusing on growth for the City and efforts to attract a newer or different demographic, the plan must not forsake improving the quality of life for those who already are members of our community.

We support the “Big Moves”

We support the “Big Moves” identified in the draft plan, including: (1) re-writing the zoning ordinance; (2) re-imagining certain priority growth nodes; (3) expanding housing opportunities; (4) providing greenways & parks for all; (5) reconnecting the city; and (6) realigning city facilities.

We note that, while we generally support the Big Move to re-write the zoning ordinance to a form-based code and to improve health, resiliency and access, we believe that **any zoning changes or revisions must include greater transparency and opportunities for public participation**. Neighborhood associations, impacted residents and other stakeholders should have direct opportunities to be involved in the planning process and any changes to zoning impacting their neighborhoods or properties. It is imperative that each and every member of our community have an opportunity for their voice to be heard when their neighborhood’s built environment is impacted. We also believe that this Big Move should be revised to note a focus on maintaining existing neighborhoods as well as creating new neighborhoods.

We also appreciate the Big Move to re-imagine certain priority growth notes and the focus on urban historic districts such as Monroe Ward, Jackson Ward, Shockoe and Manchester in the Downtown Node as priority growth nodes. As these historic districts are prioritized, we note that urban design is critically important to enhance the quality of life in these neighborhoods. For these neighborhoods to thrive, they must be high-quality, distinctive and well-designed. Each of these areas has significant historic resources and high quality and distinctive historic architecture that should be preserved. As these areas develop through new construction (we love the idea to cap I-95/I-64 to reconnect Jackson Ward and North Jackson Ward!), **we urge the planning department to consider form based zoning and zoning districts and/or design overlays that will encourage a diversity of new architecture that responds to and complements Richmond’s existing and historic built environment in such a way that these neighborhoods can continue to be unique, beautiful and authentic**.

We also appreciate the Big Move to have 100% of Richmonders within a 10-minute walk of a park. This Big Move must not be overshadowed as denser development is encouraged and vacant parcels are developed as other Big Moves are pursued.

We support key Goals, Objectives and Strategies

We support a number of key Goals, Objectives and Strategies included in the draft plan. We believe that Goal 3 **to support growth that preserves the historic urban fabric and enhances understanding of Richmond’s multi-faceted past** and Goal 4 **to establish a distinctive city comprising architecturally significant buildings connected by a network of walkable urban streets and open spaces to support an engaging built environment** and their related Objectives 3.1, 3.2, 3.3, 4.1, 4.2 and 4.3 are critically important. In addition, we are pleased to see the following items incorporated in the draft plan:

- We support **developing a city-wide preservation plan** (Objective 3.1.a) to establish near and long-term preservation priorities and to identify proactive and innovative strategies to protect the character, quality, and history of the city and its neighborhoods.
 - As the plan seeks to increase the number of residents and jobs at Nodes and along enhanced transit corridors (Objective 6.1), an objective we support, we expect there will be pressure to demolish historic structures. Development of a preservation plan will establish community preservation priorities to help guide this growth and preserve the architectural character of our neighborhoods.
 - We also note that the draft plan is written at a high level and does not reference specific properties or types of historic resources such as, for example, city-owned facilities such as the Blues Armory, Pump House and historic school properties, or African American cemeteries. We believe that such a preservation plan should be prioritized and that its development can help address the very important objective to **broaden the constituency for historic preservation by more equally representing, preserving and sharing the sites related to traditionally underrepresented groups** (Objective 3.3).
- We support **revising the Commission of Architectural Review's Guidelines** (Objective 3.1.d) to improve the clarity and usability and to respond to new technologies and market demand.
- We support **developing zoning districts that support, protect and enhance neighborhood character** for those neighborhoods not protected by City Old & Historic Districts (Objective 4.1a).
- We support the City's **spot blight property acquisition process**, and prioritizing disposition to non-profit housing developers and/or the Land Bank (Objective 3.2.c).
- We support **developing a city-wide demolition review policy** (Objective 3.2.f) to ensure historic resources are considered before any demolition can proceed.
- We support reviewing and **revising the City's tax abatement program to incentivize preservation best practices, energy efficiency and projects providing affordable housing** (Objective 3.1i). We also support the similar but more specific objective of amending the rehabilitation tax abatement program to provide incentives for for-profit developers to create mixed-income residential housing where at least 20% of the units are affordable to households earning less than 50% of the AMI (Objective 14.1.b).
- We support the Goal 14 to **preserve, expand, and create mixed income communities, by preserving existing housing units and developing new ones - both rental and owner occupied – throughout the city.**

- We note that the position of City Preservation Planner has been vacant for some time and ask that this vacancy be filled as soon as possible to support these goals and objectives.

We recommend revision for greater transparency and public participation in the planning process

We recommend that Goal 5 be revised to provide for **greater transparency and opportunities for public participation and community engagement in city planning processes** and with respect to projects that impact the City and its neighborhoods. In particular, we would like to see the rezonings to implement the Future Land Use Plan and revisions to the zoning ordinance include certain revisions to the planning decision-making process, such as public notice of planning decisions, an opportunity for public review of planning decisions and zoning determinations, and a requirement that developers meet with the community to discuss proposed developments in connection with plan of development review.

We note that the final stages of this draft plan have occurred during the COVID-19 pandemic and a time of significant social unrest when the community is both distracted by pressing personal, economic and social issues and unable to provide in person feedback as they would be able to do in normal circumstances. We are concerned that adopting a master plan that does not contemplate robust public participation in future planning processes at a time when public participation is limited will erode public confidence in the master plan and the planning process in general. Accordingly, we recommend providing additional opportunities for meaningful community engagement and feedback beyond the July 13 deadline.

Thank you!

We are grateful to the staff of the City Planning Department and Richmond 300 team for their efforts to produce this draft plan – an effort first launched in 2017. We know this has taken a great deal of time, energy and thought. Historic Richmond thanks you for the care and attention you devote to matters impacting Richmond and we appreciate your efforts to make Richmond a better place – a high quality place for all.

Please do not hesitate to contact me at ccrump@historichrichmond.com with any questions regarding this letter.

Sincerely,



Cyane B. Crump
Executive Director

cc: Harold Williams, President Historic Richmond Board of Trustees