

# Memorandum



To: Richmond City Council  
From: Maritza Mercado Pechin, AICP, Deputy Director, Office of Equitable Development, Department of Planning and Development Review  
Date: July 6, 2021  
Re: Responses to Richmond City Council Requested Amendments to the Richmond 300 Master Plan

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Staff reviewed the requested amendments to the Master Plan and categorized them into 4 categories:

- Already in the plan: Amendments which are already part of the Richmond 300 master plan.
- Clarifying: Amendments that are mainly clarifying or explanatory.
- Out of Scope: Amendments which are either too specific or not relevant to a land use planning document
- Fundamental change: Amendments addressing elements of the plan which were vetted through extensive community input and would require significant public engagement at both the community and citywide scale

## **Chapter 1: Vision and Core Concepts**

- 1.a Council Requested Amendment: Page 12: The Master Plan offers three possible population growths; moderate, strong, and aggressive. Amend the Plan to select growth at the aggressive. Option as a priority goal. Richmond cannot afford to consider moderate growth nor strong. Response: **Out of scope**. The growth scenarios presented in the introduction to the plan are projections based on recent trends. The plan does not promote one growth scenario above any other, and cannot directly control the amount of growth that occurs over the next 20 years. Rather, the plan seeks to accommodate future growth, though some strategies in the plan may positively affect the amount of growth.

Though no one truly knows how much the City of Richmond will grow over the next 20 years, Richmond 300 plans to accommodate and encourage the plan's Aggressive Growth Projections. The Vision for the High Quality Places chapter of the plan assumes there will be Aggressive Growth in the city as it states that "Richmond leads the region in high-quality business and residential growth." The Aggressive Growth Projection assumes strong growth of families with children, young and old adults, and dynamic job growth within the city. The Priority Goal of the plan is to have a city that will encourage this type of growth in an equitable and sustainable manner. By working to achieve the city-wide and 5 topic visions of the plan, this type of growth will occur because Richmond will be a well-designed city of communities where people will want to raise families, return to as a young adult or retiree, be able to age in place, and find a high quality job.

The potential land demand to meet the needs of the Aggressive Growth Projection is 3,500 acres for housing, commercial, and mixed-use development. There is currently 3, 595 acres of vacant land and 6,153 acres of under-developed land in the city. The future land use map designates these areas a variety of categories to allow for the mix of uses needed to meet this type of growth.

The Implementation Chapter of the Plan states that the desired trend for "Total population" is "increase." (p.181).

- 1.b Council Requested Amendment: Page 14, Figure 6: The Oak Grove-Bellemeade communities are just beginning to face realtors' speculative sales and increases in property values - although vacancy, code violations, and abandonment is shown in the Figure#6 map on pg. 14. Buffered by Route 1 and Commerce Rd., this is an ideal first-time homeowners' neighborhood where many long term seniors still live on fixed incomes. A special node for retainage of single family home owners is needed with a protected buffer of neighborhood mix-use on the Southside of Commerce Rd. and industrial and institutional on the Northside of Commerce Rd.  
**Response: Already in the plan.** See Objectives 14.8 and 14.9 on page 155, as well as the Route 1/ Bellemeade Priority Growth Node Description on page 44. A number of strategies to prevent involuntary displacement exist in the plan under Objective 14.8 on page 155 ("Develop inclusionary and equitable housing options for our gentrifying neighborhoods to prevent involuntary displacement") and Objective 14.9 ("Assist households that desire to age in place in their neighborhoods"). The Route 1/ Bellemeade Priority Growth Node Description on page 44 includes the following as a primary next step related to the surrounding single-family neighborhoods of Oak Grove and Bellemeade: "Develop programs that permit homeowners to remain in their homes, in high-quality structures to limit the involuntary displacement of residents in the surrounding single-family neighborhoods."
- 1.c Council Requested Amendment: Page 30: That Primary Next Steps on page 30 of the Richmond 300 (and throughout the plan as appropriate) be amended to add: Jackson Ward Community Plan & Overlay District: Develop a small area plan and design overlay district with the entire Jackson Ward community and related stakeholders to reconnect this historically Black neighborhood, preserve its historic and architectural integrity and manage potential involuntary displacement and inclusive housing.  
**Response: Clarifying.** Much of the Jackson Ward neighborhood is within a City Old & Historic District. The community plan for Gilpin/Jackson Ward, which is just in early pre-planning stages, may eventually include recommendations related to historic preservation, involuntary displacement, and inclusive housing. A Primary Next Step on page 30 includes developing a plan for the Gilpin Court Transformation to include Gilpin Court and vacant land in North Jackson Ward. The scope of this plan has been modified to include all of Jackson Ward, from Broad Street to the railroad tracks and Belvidere Street to 3<sup>rd</sup> Street. While the language of this next step can be modified to reflect this change, it would be an inconsequential change given that the Gilpin/Jackson Ward Community Plan process is underway and the study area already reflects this requested change.
- 1.d Council Requested Amendment: Small Area Plan: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300 (Goal 1). (Add:) The Shockoe Small Area Plan will serve as the City's chief reference for developing rules to govern building height, land use intensity, density, and design in Shockoe Bottom. Amend the Future Land Use map in accordance with the Shockoe Small Area Plan.  
**Response: Already in the plan.** The "Primary Next Steps" for the Downtown-Shockoe Node already states, "Implement the recommendations in the Shockoe Small Area Plan, some of which include: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300" (p. 32).
- 1.e Council Requested Amendment: Rezoning: Rezone the Shockoe area in alignment with the (Add:) Shockoe Small Area Plan to allow appropriate growth while also protecting and enhancing significant historic sites (Goal 1).  
**Response: Already in the plan.** This is already implied in the plan as the Shockoe Small Area Plan will be adopted as part of Richmond 300 (p. 32).
- 1.f Council Requested Amendment: Page 51, Figure 8: To increase businesses and job growth, destination mixed-use is requested on all of Route 1 and Chamberlayne, Midlothian and Hull now recommended for corridor mixed use.

Response: Fundamental change. The Future Land Use Map in the plan was developed with extensive community and citywide input. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan. The Corridor Mixed-Use depicted for these areas will allow for a substantial job and population growth. (p. 60). The Plan notes Corridor Mixed-Use is “found along major commercial corridors and envisioned to provide for medium- to medium-high-density pedestrian- and transit-oriented development.” In addition to the character of and vision for the corridors, parcel depth and size was reviewed by staff and the Land Use Working Group when examining the appropriate designation for these corridors.

- 1.g Council Requested Amendment: Page 51, Figure 8: Broad Street West, from Downtown to the Henrico county line, should be amended to be corridor mixed- use, not destination mixed–use. Add Mechanicsville and Forest Hill to corridor mixed-use).

Response: Fundamental change. The Future Land Use map currently designates Broad Street as “Corridor Mixed-Use”. The portions of West Broad Street designated Destination Mixed-Use were designated Nodal Mixed-Use as part of the Pulse Corridor Plan which was created with extensive community engagement and received Council approval. The Nodal Mixed-Use category was renamed Destination Mixed-Use in *Richmond 300*. Portions of Mechanicsville and Forest Hill have Community Mixed-Use, Corridor Mixed-Use, Neighborhood Mixed-Use and Destination Mixed-Use to encourage growth at appropriate scales. Activity is concentrated at nodes and certain segments of these corridors. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.

- 1.h Council Requested Amendment: Pages 51 & 76: Land use must be more equitable for multi-family and single family housing, yielding an average of twenty percent (20%) for both housing options.

Response: Out of scope. More clarification and guidance is needed to fully evaluate this amendment as the purpose is unclear. For reference, in 2015, 56% of all housing units were single-family and 38% were multi-family.

The Future Land Use map shows 45% of the City as “Residential” and 32% of the City designated land use categories that include some type of multi-family as a primary use. The “Residential” category states that duplexes and small multi-family buildings (typically 3-10 units) as a secondary use which may be found along major streets. The “Neighborhood Mixed-Use” category includes single-family residential as a primary use.

Richmond 300 identifies steps to encourage more diverse housing options throughout the city (see response to Comment #1). In creating the Richmond 300 Future Land Use Map, the Land Use Working Group intentionally eliminated the Single-Family Residential Land Use Category. Many neighborhoods which were designated Single-Family Residential are now designated Neighborhood Mixed-Use, a category that notes small multi-family buildings as a primary use and large multi-family buildings as a secondary use.

While engaging with residents throughout the city from the Oak Grove to Westhampton, PDR heard the desire to preserve the character of their residential neighborhoods. The Residential Land Use Category acknowledges this desire while still encouraging growth by noting accessory dwelling units as a primary use and duplexes and small multi-family buildings (typically 3-10 units) as a secondary use which may be found along major streets (see Street Typology Map). Additionally, Strategy 14.5.e allows for the development of middle housing (2- to 4-unit buildings) by-right within a half mile of high-frequency transit stops (p. 152). By allowing multi-family on major streets and within a half mile of high-frequency transit stops, there is opportunity for multi-family development within the residential land use category. The streets shown in yellow on Figure 12 on page 73 are major streets that run through areas that are designated as the “Residential” category. The Enhanced Transit Routes are shown in Figure 14 on page 77.

- 1.i Council Requested Amendment: Page 51, Figure 8 & Page 77, Figure 14: Increase density by greater future land use from residential to neighborhood mixed use in neighborhood shown in Figure 14 on page 77, where excessive blight, abandoned, vacant buildings, lands and under-developed land exists - which is currently experiencing high land values speculation, spikes in values, gentrification and dislocation of lower income seniors and rental housing. Special nodes are needed in these areas to retain owner occupancy, increase decent, and lower scale multifamily housing to cause inclusion, not displacement, and affordable diversity instead of only large lot single family housing racing to reach values of \$550,000. The Master Plan calls for aggressive code enforcement without incentives to retain existing owners. The neighborhood areas to be changed from residential to neighborhood mixed-use are Broad Rock, Jahnke Road, Cary (Far West), Broad Street (Far West), Brookland Park and Highland Park.

Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan. A number of strategies to prevent involuntary displacement exist in the plan under Objective 14.8 on page 155 (“Develop inclusionary and equitable housing options for our gentrifying neighborhoods to prevent involuntary displacement”) and Objective 14.9 (“Assist households that desire to age in place in their neighborhoods”).

The Final Plan reflects amendments to the Draft Plan to change the land use designations in some of the areas noted. Neighborhood Mixed-Use areas are those with smaller parcels (1,500 to 5,000 sf) in size. Residential areas are those with larger parcel size (5,000sf to 20,000 sf+). Most the neighborhoods mentioned are very established neighborhoods with homes on large parcel sizes, therefore the Residential category is most appropriate. Note that the “Residential” category states that duplexes and small multi-family buildings (typically 3-10 units) as a secondary use which may be found along major streets.

Broad Rock: The Future Land Use designation along much of Broad Rock has been changed to Neighborhood or Community Mixed-Use since the Draft version of the plan.

Jahnke Road: Portions of Jahnke are designated Neighborhood or Community Mixed-Use. The adjacent residential neighborhoods provide smaller scale single family housing stock that adds to the diversity of housing options available in the city.

Cary (Far West): This is an established residential corridor with limited opportunities for redevelopment. We have heard extensively from this community about the desire to maintain the Residential future land use category.

W. Broad Street (Far West): Broad Street is designated Corridor Mixed-Use and Destination Mixed- Use. There are several major streets that cross the neighborhoods to the south of W, Broad Street which could accommodate additional multi-family development.

Brookland Park and Highland Park: The corridors of the Brookland Park and Six Point nodes are designated Community Mixed-Use Nodes. The surrounding neighborhoods are primarily single-family neighborhoods with homes on large lots.

- 1.j Council Requested Amendment: Page 53: The areas shown on the land use map on page 53 of the Land Use Plan on the north side of Broad Street between Third Street and Arthur Ashe Boulevard, and including the several blocks north of Broad Street as designated in the Land Use map, should be changed from the designation of Mixed Use to Corridor Mixed Use.

Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. The portions of West Broad Street designated Destination Mixed-Use were designated Nodal Mixed-Use as part of the Pulse Corridor Plan which was created with extensive community engagement and received Council approval. The Nodal Mixed-Use category was renamed Destination Mixed-Use in Richmond 300. Amending

the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.

- 1.k Council Requested Amendment: Page 53: The areas shown on the land use map on page 53 of the Land Use Plan on the south side of Broad Street between Ryland and Arthur Ashe Boulevard should abide by the Land Use terms as specified in the Pulse Corridor Plan. Response: **Already in the plan.** The Future Land Use Map did not significantly change regarding the south side of W. Broad Street from the Pulse Plan to Richmond 300. In both plans the areas are shown as Corridor Mixed Use and the definition for Corridor Mixed-Use is substantively the same in both plans. The adopting ordinance for Richmond 300 explicitly states that the Pulse Corridor Plan is to be retained as an element of the City's Master Plan, so its guidance and recommendations (aside from the Future Land Use Map) are still relevant. That said, future land use designations are guidance for elected officials to follow in making land use decisions. Ultimately, the zoning district for each parcel of land will determine what is allowed to be built on that property. For instance, these text sections are still relevant:

The Corridor Mixed-Use area on the south side of W. Broad Street envisions more limited redevelopment at a smaller scale and height. New infill development should be limited in scope, prioritizing the preservation of significant historic buildings that embody the form and function of Corridor Mixed-Use. New development on the south side of W. Broad Street should be limited to four stories in height between Ryland and Strawberry Streets, and five stories in height between Strawberry Street and Boulevard, with the exception of key intersections, such as at W. Broad and Robinson Streets and W. Broad Street and N. Boulevard, which should be developed at a higher scale befitting their role as standout corners, with extensive discussion with the surrounding community. In order to reduce its effect on lower-scale residential uses to the south, any new development here should employ at 20' rear yard setback from alleys, as well as massing strategies, such as a two-story stepback from the rear, that push the massing toward W. Broad Street. (Pulse Corridor Plan, p. 63)

Recommendation SA.21 Rezone the areas around the Science Museum of Virginia and Allison Street stations to districts that align with the Future Land Use Map, working closely with neighborhood groups to ensure that future zoning districts are sensitive to the context of the neighborhood. Neighboring civic associations express a strong preference that new development along the south side of W. Broad Street be limited in height, promotes the preservation of historic building stock, and provides adequate buffers to the residential neighborhoods to the south. (Pulse Corridor Plan, p. 64)

- 1.l Council Requested Amendment: Page 53: The areas shown on the land use map on page 53 of the Land Use Plan that include Jackson Ward are hereby changed from Destination Mixed Use to Community Mixed Use. Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. Jackson Ward is not shown as "Destination Mixed-Use" but rather, "Neighborhood Mixed-Use." Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.
- 1.m Council Requested Amendment: Page 53, Figure 11, and Page 85, Figure 18: Future Land Use Map: Insert footnote for Shockoe Bottom: The Future Land Use Map will be amended to reflect neighborhood designations approved in the pending Shockoe Small Area Plan. Response: **Already in the plan.** The "Primary Next Steps" for the Downtown-Shockoe Node already states, "Implement the recommendations in the Shockoe Small Area Plan, some of which include: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300" (p. 32).
- 1.n Council Requested Amendment: Page 53, Figure 11, and Page 85, Figure 18: Future Land Use Map: Change the designation east of 21<sup>st</sup> Street to Gillies Creek (at Main Street) to Neighborhood Mixed-Use

Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.

- 1.o Council Requested Amendment: Page 53: Oregon Hill should be removed from the Neighborhood Mixed Use land use designation and instead be designated Residential  
Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. The definition of Neighborhood Mixed-Use was revised during the Richmond 300 plan development process to decrease intensity in response to community concerns. PDR staff and the Richmond 300 Advisory Council had multiple discussions specifically regarding the future land use designation of Oregon Hill at Advisory Council meetings and with the Oregon Hill community. Changes were made to the Neighborhood Mixed-Use Category to reflect concerns regarding scale while still allowing the district to be applicable citywide. Multiple zoning categories are appropriate in the Neighborhood Mixed-Use area including the R-7 district. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.
- 1.p Council Requested Amendment: If the relief requested in above is not granted, we request use of below: If Oregon Hill is not designated Residential, the height limit in Neighborhood Mixed Use should be changed from “four” to “three” stories to reflect actual conditions in the neighborhood. A residential story is generally accepted to be 10’ 8” in height; three stories at this dimension results in a maximum height of 32 feet. To avoid a height limit less than the existing limit in R-7, we request the adoption of the existing R-7 height limit of 35 feet.  
Response: **Out of scope.** This level of specificity is not appropriate for the scale of Richmond 300 nor Future Land Use designations, and is more at the level prescribed by the Zoning Ordinance and its districts, which have not been changed with the adoption of Richmond 300.
- 1.q Council Requested Amendment: Page 56: The second sentence of the paragraph titled “Intensity” on page 56 of the Master Plan should be amended to add: Jackson Ward Community Plan & Overlay District: Develop a small area plan and design overlay district with the entire Jackson Ward community and related stakeholders to reconnect this historically Black neighborhood, preserve its historic and architectural integrity and manage potential involuntary displacement and inclusive housing.  
Response: **Clarifying.** Much of the Jackson Ward neighborhood is within a City Old & Historic District. The community plan for Gilpin/Jackson Ward, which is just in early pre-planning stages, may eventually include recommendations related to historic preservation, involuntary displacement, and inclusive housing. A Primary Next Step on page 30 includes developing a plan for the Gilpin Court Transformation to include Gilpin Court and vacant land in North Jackson Ward. The scope of this plan has been modified to include all of Jackson Ward, from Broad Street to the railroad tracks and Belvidere Street to 3<sup>rd</sup> Street. While the language of this next step can be modified to reflect this change, it would be an inconsequential change given that the Gilpin/Jackson Ward Community Plan process is underway and the study area already reflects this requested change.
- 1.r Council Requested Amendment: If this cannot be done, then we request the following: Remove South Laurel Street (south of Cary Street) and Idlewood Street from the street Typologies map on p. 73 from the “Major Street” designation that would allow the construction of buildings by right that are taller than the existing zoning allows.  
Response: **Fundamental change.** The Street Typologies Map was developed based on VDOT’s Road Classification and the proposed Future Land Use. The designation of Idlewood Avenue as a “Major Mixed-Use Street” does not change what can be constructed “by-right” which is based on what the Zoning Ordinance prescribes, not what Richmond 300 recommends. The Future Land Use description for “Neighborhood Mixed Use” only states that,

“Buildings taller than four stories may be found along major streets (see Street Typologies Map),” a guiding principles that would be applied in cases needing Council approval such as a rezoning or Special Use Permit.

- 1.s Council Requested Amendment: The second sentence of the paragraph titled “Intensity” on p.56 of the Master Plan should be deleted.  
Response: **Fundamental change.** This would affect potential intensity across many neighborhoods and is a key strategy for adding some more appropriate density along major streets. This does not change the zoning or what is allowed “by-right”, and any future development relying on this recommendation would still need special approval by Council if it is not allowed by the zoning district in which the property is located.
- 1.t Council Requested Amendment: The area of West Grace Street between Lombardy and Arthur Ashe Boulevard should be removed from the Great Streets designations (in any of its iterations, including Major Mixed Use Street) and map entirely.  
Response: **Fundamental change.** W. Grace Street is not designated as a Great Street, only a Major Mixed Use Street. The Street Typologies Map was developed based on VDOT’s Road Classification and the proposed Future Land Use. W. Grace Street is a “Major Collector” and is located in a “Neighborhood Mixed Use” Future Land Use category, which is why it is designated as a “Major Mixed Use Street.” All Major Collectors throughout the City have a “street typology” designation based on the Future Land Use Category the street runs through.
- 1.u Council Requested Amendment: Page 58: Paragraph entitled “Intensity” on page 58 of the Master Plan, as such paragraph applies to the areas on the north side of Main Street from Shields to Boulevard, should be amended to allow buildings generally ranging from two to four stories, except where existing zoning prior to the adoption of the master plan allows for greater height or intensity.  
Response: **Fundamental change.** Revisions to the Future Land Use category of “Community Mixed-Use” would apply citywide to all similarly-designated corridors, and would need to be undertaken as part of a concerted re-examination of the entire Future Land Use Map. The Future Land Use does not change the zoning or what is allowed “by-right”, and any future development relying on this recommendation would still need special approval by Council if it is not allowed by the zoning district in which the property is located. Additionally, the Intensity Section on page 58 notes that appropriate building height within the range is “based on street widths and depending on the historic context.”
- 1.v Council Requested Amendment: Page 79, Figure 15: Revise and replace the “Future Connections Map” to remove the proposed downriver bridge and Interstate highway interchange.  
Response: **Fundamental change.** Both of these proposed transportation projects are preliminary concepts that require future study and engagement. While the Future Connections Map promotes a variety of multi-modal transportation improvements, continued investment and improvement of the city’s and the region’s highways and roads cannot be discounted. The proposed interchange of I-95 at Bellemeade Rd has been an idea since at least the last full master plan adoption in 2001, and may be a worthwhile project that would provide alternate access to and from I-95, while decreasing the amount of truck traffic through residential neighborhoods. The conceptual bridge across the James River could provide commuters (whether by car, bus, bike, etc.) living in eastern Henrico with easy access to I-95 and into the city, as opposed to further exacerbating the congestion along Route 5 and E. Main Street.
- 1.w Council Requested Amendment: Page 80: Delete #17 and #18, removing reference to the proposed downriver bridge and Interstate highway interchange.  
Response: **Fundamental change.** Please see above comments in response to Amendment “1V”.

- 1.x Council Requested Amendment: The Carver Community would like to request that land use designation of Destination Mixed-Use and Corridor Mixed-Use be changed to Community Mixed-Use.  
Response: **Fundamental change.** Destination Mixed-Use is the appropriate category for the parts of Carver along Broad street because those parcels are zoned B-4 today. The interior of the Carver community is shown as Neighborhood Mixed-Use on the Future Land Use Map. Because the Future Land Use Map in the plan was developed with extensive community and citywide input, amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.
- 1.y Council Requested Amendment: The 6-Public housing communities should be included in the future land use. All surplus city land assigned to the Land Bank should be reserved for housing at thirty percent (30%) of the area median income. Existing RRHA managed- HUD owned land that is deeded to the City for redevelopment should increase inclusive, low-income housing throughout each priority growth node.  
Response: **Already in the plan.** The 6 public housing courts are included in the Future Land Use Map and shown as “Neighborhood Mixed-Use.” Objective 14.6 on page 154 is to transform Richmond Redevelopment and Housing Authority (RRHA) public housing properties into well-designed, walkable, mixed-use, mixed-income, transit-adjacent communities. Additional considerations for the land bank and RRHA managed-HUD owned land that is deeded to the City is beyond the scope of the master plan is more appropriate for a Housing Plan.
- 1.z Council Requested Amendment: That the Historic and Cultural Attractions Primary Next Step on page 30 of the Richmond 300 (and throughout plan as appropriate) be amended to include the Historic Jackson Ward Neighborhood and 2nd Street (between Broad and Duval.) Revise as follows: Historic and Cultural attractions: Maintain, grow and market the historic Jackson Ward neighborhood highlighting its unique history and architecture and historic attractions such as the Black History Museum, Maggie L. Walker’s home and the 2nd Street Corridor.  
Response: **Clarifying.** Richmond 300 lists a couple examples of Jackson Ward’s architecture and historic attractions as examples of such. If an attraction or historic site is not listed in the plan that does not mean it is not relevant. There are several recommendations in Goal 3: Historic Preservation and Goal 12: Tourism that relate to the topic of preserving and maintaining Richmond’s historical assets and authenticity.

## **Chapter 2: High-Quality Places**

- 2.a Council Requested Amendment: Page 84: Add “Seek authority from the Virginia General Assembly to enact an Inclusionary Zoning ordinance to strengthen the City’s ability to mandate the provision of affordable housing.” as Objective 1.1(g).  
Response: **Already in the plan.** This is already in the “Inclusive Housing” section, under Objective 14.3, Strategy c: “Lobby the General Assembly to give Richmond powers under 15.2-2304, which allows localities to adopt mandatory inclusionary zoning programs” (p. 152).
- 2.b Council Requested Amendment: Page 85, Figure 18: Recommend a targeted amendment to the Future Land Use Map to make it clear that the Future Land Use map will be amended in accordance with the Shockoe Small Area Plan.  
Response: **Already in the plan.** The “Primary Next Steps” for the Downtown-Shockoe Node already states, “Implement the recommendations in the Shockoe Small Area Plan, some of which include: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300” (p. 32).
- 2.c Council Requested Amendment: Page 92, Goal 3, Historic Preservation, Existing Context, National Historic District: Add: Where the Virginia Department of Historic Resources (DHR) holds easements written to preserve the character of a National Register Historic District land use rules applicable to land within those easements should reinforce those easements’ intent.



The easement in Shockoe Bottom that protects historic views between Tobacco Row, the St John's Church Old and Historic District, and the James River is a primary example of such easements.

**Response: Out of scope.** After consultation with the City Attorney, PDR decided not to highlight existing easements or other legal contracts which are not affected by Richmond 300 or otherwise have any relation to the Master Plan.

- 2.d **Council Requested Amendment:** The viewshed provisions should be strengthened by stating explicitly: "Establish a means to protect and enhance views of critical natural features, particularly the downriver view from Libby Hill Park. Development on City-owned parcels within any defined and protected viewshed should not block such viewshed." Edit the following sections accordingly:
- ADD: Establish viewshed protections to protect and enhance views of critical natural features, such as the downriver view from Libby Hill. Development on city-owned parcels within the defined Libby Hill viewshed should not block views of the river from Libby Hill.
- Response: Out of scope.** This is too specific and will be determined by zoning and the aforementioned viewshed overlay district.
- 2.e **Council Requested Amendment:** Page C-28, Priority Growth Nodes: Rocketts Landing, Primary Next Steps Add: Protect and enhance views of critical natural features, particularly the downriver view from Libby Hill Park. Development on City-owned parcels within the defined viewshed should not block the views of the river.
- Response: Out of scope.** This is too specific and will be determined by zoning and the aforementioned viewshed overlay district.

### Chapter 3: Equitable Transportation

- 3.a **Council Requested Amendment:** Page 124: State explicitly that the intensity standard for the "major street" designation does not recommend raising building heights above that permitted by existing zoning in those areas. [This is intended to address the designation of Idlewood and South Laurel between Cary and Idlewood as "major streets" (p. 124) that "Buildings taller than four stories may be found on major streets" (p. 56)]
- Response: Out of scope.** The Future Land Use introduction on p. 52 of the plan already explains that Future Land Use is visionary and does "not specify what an owner can or cannot legally do with their property."
- 3.b **Council Requested Amendment:** Page 127, Figure 30: Revise and replace the "Connections, Interchanges, and Bridges Map" to remove the proposed downriver bridge and Interstate highway interchange.
- Response: Fundamental change.** Both of these proposed transportation projects are preliminary concepts that require future study and engagement. While the Future Connections Map promotes a variety of multi-modal transportation improvements, continued investment and improvement of the city's and the region's highways and roads cannot be discounted. The proposed interchange of I-95 at Bellemeade Rd has been an idea since at least the last full master plan adoption in 2001, and may be a worthwhile project that would provide alternate access to and from I-95, while decreasing the amount of truck traffic through residential neighborhoods.

The conceptual bridge across the James River could provide commuters (whether by car, bus, bike, etc.) living in eastern Henrico with easy access to I-95 and into the city, as opposed to further exacerbating the congestion along Route 5 and E. Main Street.

- 3.c **Council Requested Amendment:** Page 138: Add "including increased business contracting opportunities for Section 3 resident owned businesses." to the end of Objective 11.2(a).

Response: **Out of scope.** This seems overly specific given the scope of the master plan though this is something to explore for inclusion in the City's proposed Community Benefits Agreements which are currently being drafted.

- 3.d Council Requested Amendment: Amend the plan to add priority nodes as follows: Establish a "Smart Growth Priority Growth Node" for neighborhoods of the Big Six Public Housing neighborhoods of high density public housing to include amenities to achieve the qualities of life principles of the master plan, the grow of businesses and jobs within the node's areas, address food deserts, and provide blended economic scale of housing;  
Response: **Already in the plan.** Objective 14.6, along with numerous strategies, already states: "Transform Richmond Redevelopment and Housing Authority (RRHA) public housing properties into well-designed, walkable, mixed use, mixed-income, transit-adjacent communities" (p. 154). This includes a strategy (14.6.b) to develop small area plans with inclusive community input (including existing RRHA residents) to plan for the redevelopment of mixed-income neighborhoods on public housing sites for 1) Gilpin Court, 2) Mosby South, 3) Creighton Court, 4) Mosby North, 5) Fairfield Court, 6) Whitcomb Court, and 7) Hillside Court. (p. 154).
- 3.e Council Requested Amendment: Amend the plan to add priority nodes as follows: Create an overlay "Smart Growth Priority Node" in neighborhoods where gentrification is increasing sales and rents values greater than the average economy growth and growth in real estate assessment values by more than the average growth rate to include land use with promotes increased multi-family housing development and smaller lots size to promote increased density.  
Response: **Already in the plan.** A number of strategies to prevent involuntary displacement exist in the plan under Objective 14.8 on page 155 ("Develop inclusionary and equitable housing options for our gentrifying neighborhoods to prevent involuntary displacement") and Objective 14.9 ("Assist households that desire to age in place in their neighborhoods").

#### **Chapter 4: Diverse Economy**

#### **Chapter 5: Inclusive Housing**

- 5.a Council Requested Amendment: Page 151: Add "and commit to the establishment of a permanent inclement weather shelter for houseless people in the city of Richmond." to the end of Objective 14.2(i).  
Response: **Out of scope.** The City's Strategic Plan to End Homelessness calls for eliminating the need for a City-sponsored permanent inclement weather shelter by partnering with nonprofit and faith-based organizations to create more emergency shelter beds and creating more permanent supportive housing (Strategy #2 on page 27).
- 5.b Council Requested Amendment: Page 152: Add "Recommend AHTF funds be used for the creation of units as opposed to programming." to the end of Objective 14.3(a).  
Response: **Out of scope.** This would need to be vetted with HCD and other stakeholders and is more appropriate for a Housing Plan.
- 5.c Council Requested Amendment: Page 152: Add "Commit to requiring developers who purchase public land to provide affordable units for families and individuals making less than 30% AMI." as 14.3(e).  
Response: **Out of scope.** This may not be feasible and should be addressed during the sale of City-owned real estate, such as through an issuance of an RFP. This idea is something to explore for inclusion in the City's proposed Community Benefits Agreements which are currently being drafted.
- 5.d Council Requested Amendment: Page 152: Change "...20% or more of units at 50% AMI." to "...20% or more of the units at or below 50% AMI." within Objective 14.4(a)  
Response: **Clarifying.**

- 5.e Council Requested Amendment: Page 152: Delete Objective 14.4(d), “Create affordable housing tax-increment finance (TIF) zones for land within a half mile of Pulse stations and direct the future incremental tax revenues funds from the TIF to the Affordable Housing Trust Fund for funding mixed-income projects within the Pulse TIF zone; establish similar TIF zones along future enhanced transit corridors.”  
Response: **Fundamental change.** This strategy was promoted as a way of providing affordable housing near areas that are well served by transit.
- 5.f Council Requested Amendment: Page 152: Add “, reserving some density for the purpose of negotiating for affordable housing units from private developers, to the extent that the General Assembly authorizes the City to lawfully engage in such an inclusionary zoning practice.” to the end of the first sentence in Objective 14.5(a), after “(see Goal 1).”  
Response: **Out of scope.** The City administration is currently rewriting the Affordable Density Bonus Program in order to make it more effective at providing affordable housing units.
- 5.g Council Requested Amendment: Page 152: Add “Use the density bonus process more consistently in higher-density areas of the city to secure greater contributions of affordable housing units.” to the end of Objective 14.5(b).  
Response: **Out of scope.** The City administration is currently rewriting the Affordable Density Bonus Program in order to make it more effective at providing affordable housing units.
- 5.h Council Requested Amendment: Page 152, Objective 14.5(c) (pg. 152): Update Zoning Ordinance to allow for accessory dwelling units, (add “such as granny flat or alley flat”), with form based requirements (add “and regulations”).  
Response: **Clarifying.** While this change provides an additional level of clarification on the definition of an accessory dwelling unit, the edit does not change the intention of the objective and therefore is unnecessary. Similarly, the Zoning Ordinance is a regulation, therefore the change from “requirements” to “regulations” does not change the intention of the objective.
- 5.i Council Requested Amendment: Page 154: Add “while guaranteeing one-for-one, physical unit replacement of like-kind for any public housing that is lost in the process of redevelopment.” to the end of Objective 14.6(a).  
Response: **Out of scope.** This seems overly prescriptive as Richmond 300 does not focus specifically on the redevelopment of public housing courts. Plans for those initiatives would provide a better opportunity for promoting this.
- 5.j Council Requested Amendment: Page 155: Within the bulleted list included in Objective 14.8(f), change the first bullet to “Increase access to accessible housing through implementation of an affordable housing ordinance.”, and change the fourth bullet to “Expand fair housing capacity by increasing number of affordable housing units through available legal means.”  
Response: **Fundamental change.** This goal is cited directly from the “Analysis of Impediments to Fair Housing Choice.”

## Chapter 6: Thriving Environment

## Chapter 7: Implementation

- 7.a Council Requested Amendment: Page 189, Big Moves: Change the Gilpin Court Transformational Study implementation due date from FY 22-23 to FY 20-21  
Response: **Out of scope.** This does not seem feasible given the current timeframe for this plan.
- 7.b Council Requested Amendment: Page 198, Big Moves: Provide Greenways and Parks for All, Action Step: Add: Establish view shed protections to protect and enhance views of critical natural features, such as the downriver view from Libby Hill Park. Development on City-owned

parcels within the defined Libby Hill viewshed shall not block the views of the river from Libby Hill.

Response: **Out of scope.** This is too specific by focusing explicitly on City-owned land.

- 7.c Council Requested Amendment: Big Move: Re-writing the Zoning Ordinance: Rezoning: Rezone the Shockoe area in alignment with the (ADD:) Shockoe Small Area Plan ~~Future Land Use Map~~ to allow appropriate growth while also protecting and enhancing significant historic sites.

Response: **Already in the Plan.** An action step outlined in the Rezoning Big Move calls for rewriting the zoning ordinance with community input to achieve the goals outlined in Richmond 300. When the Shockoe Small Area Plan is adopted, it will amend the Master Plan and therefore guide the rezoning effort.

- 7.d Council Requested Amendment: Big Move: Re-writing the Zoning Ordinance: Small Area Plan: Complete and adopt the Shockoe Small Area Plan (which is under development) as an element of Richmond 300. (ADD:) The Shockoe Small Area Plan will address heights, density, and design in Shockoe Bottom. Amend the Future Land Use map in accordance with the Shockoe Small Area Plan.

Response: **Already in the plan.** The “Primary Next Steps” for the Downtown-Shockoe Node already states, “Implement the recommendations in the Shockoe Small Area Plan, some of which include: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300” (p. 32).

## Other & Comments

- 8.a Council Requested Amendment: Small area plan for rezoning the North Jackson Ward vacant land for high quality, mixed use development

Response: **Already in the plan.** This already found in the Primary Next Steps for the Downtown – Jackson Ward Node: “Gilpin Court Transformation: Develop a plan with existing community input to include Gilpin Court and vacant land in North Jackson Ward to transform the neighborhood into a mixed-use, mixed-income, walkable, and transit-adjacent community that provides both housing and jobs for residents (Goal 1, Goal 14)” (p.30 ).

- 8.b Council Requested Amendment: New bridge over 2nd Street

Response: **Out of scope.** The exact location of bridges to reconnect Jackson Ward will be determined during the Feasibility Study.

- 8.c Council Requested Amendment: Future land use to include designation and conservation of burial grounds.

Response: **Out of scope.** This is not a Future Land Use element. Additionally, Strategy 3.1.b. on page 94 states: Identify partnerships and funding sources for the identification, protection, preservation, and if needed acquisition of abandoned and neglected cemeteries, especially Black cemeteries.

- 8.d Council Requested Amendment: Increase land use on Richmond Route 1

Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.

- 8.e Council Requested Amendment: Increase land use density in commercial corridors

Response: **Fundamental change.** The Future Land Use Map in the plan was developed with extensive community and citywide input. Amending the adopted Future Land Use map would require new community engagement and/or the creation of a small area plan.

- 8.f Council Requested Amendment: Add Jefferson Davis into this plan

Response: **Already in the plan.** Route 1 is addressed in the plan, specifically at two Priority Growth Nodes, Route 1 / Bellemeade Road and Route 1 / Bells Road.

- 8.g Council Requested Amendment: Schools need to be added to the plan  
Response: **Already in the plan.** Schools are considered and addressed as much as is appropriate for this type of plan and as much as RPS was able to engage with developing such strategies. Strategy 2.1.c. on page 90 addresses schools: Develop a schools facility master plan based within the context of the Future Land Use Plan to determine whether there are needs for creating, relocating, and/or closing schools to align with population projections.
- 8.h Council Requested Amendment: Amend the Plan to include the Economic Development Plan  
Response: **Out of scope.** The Economic Development Plan does not exist yet. It can be adopted as part of the master plan if City Council and the City administration choose to do so.
- 8.i Council Requested Amendment: The property near Seibert's Towing needs to remain commercial.  
Response: **Already in the plan.** The Future Land Use map designated this area "Neighborhood Mixed-Use" which would allow for a mix of uses, including commercial.
- 8.j Council Requested Amendment: Tobacco Row: The 1989 easement between Tobacco Row and the Virginia Department of Historic Resources should be explicitly cited in the plan as contributing guidance for the heights, location, and design of development between 21st Street and Rocketts Landing. The easement committed to protect the context and views to/from Tobacco Row and the St John's Church Old and Historic District as well as protect the views to/from Tobacco Row and the James River. Changing the designation for areas along east of 21st Street to Gillies Creek (at Main Street) to Neighborhood Mixed-Use with a maximum height of 4 stories would be appropriate.  
Response: **Out of scope.** After consultation with the City Attorney, PDR decided not to highlight existing easements or other legal contracts which are not affected by Richmond 300 or otherwise have any relation to the Master Plan.
- 8.k Council Requested Amendment: Shockoe Bottom: The pending Shockoe Bottom plan should be explicitly cited in Richmond300 as "the plan to serve as the City's chief reference for developing rules to govern building height, land use intensity, density, and design in Shockoe Bottom."  
Response: **Already in the plan.** The "Primary Next Steps" for the Downtown-Shockoe Node already states, "Implement the recommendations in the Shockoe Small Area Plan, some of which include: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300" (p. 32).
- 8.l Council Requested Amendment: Add narrative for the National Slavery Museum: Richmond intends to build a National Slavery Museum -- the Museum of the American Slave Trade, in Shockoe Valley, on the site of the largest slave market on the East Coast of America. The National Slavery Museum will include the excavation of Lumpkin's Slave Jail, known as the Devil's Half Acre. It will tell the truth about our history to Americans and to the world. We intend to overcome our history of racism and race-based slavery. Monument Avenue is gone. This Museum, on the major north-south highway of America's East Coast, will proclaim that Richmond is no longer the Capital of the Confederacy, but a Capital of Truth and Reconciliation.  
The National Slavery Museum will be adjacent to the Main Street Station, located in a campus dedicated to Enslaved African Americans, including a Memorial Park and the African Burial Grounds. The city has already received plans and drawings for the National Slavery Museum, and a full preliminary study, including an award-winning design, prepared by the Smith Group, designers of the Museum of African American History on the Mall in Washington. The Smith Group is currently working out the relationship of the Museum to the flood plain of Shockoe Valley. When that is complete, the consultants will work with the City's new National Slavery Museum Foundation to complete the Museum plan, including full financial feasibility/economic impact, operations planning, and fund-raising.

Response: **Out of scope.** This narrative would be better included as part of the Shockoe Small Area Plan.

- 8.m Council Requested Amendment: Very surprised to see a new I-95 interchange with Bellemeade Road and bridge across the James River to Henrico County in the area of Tree Hill Farm proposed on the map in the Draft Plan, with no text on it at all. This significant potential project received little to no attention in presentations. A bit of text was added to the Final Plan but this significant concept was not adequately vetted. The interchange may be OK, but the proposed new bridge in particular is problematic – they raise multiple community, land use, and environmental issues (such as the impact on truck traffic on South Side and adverse impacts on the historic Route 5 corridor). Suggest that references to the new interchange be deleted (Delete Item 18 from Figure 15, p. 79, the text on Item 18 on page 80, and the New Bridge in Figure 30, p 127).

Response: **Fundamental change.** While the Future Connections Map promotes a variety of multi-modal transportation improvements, continued investment and improvement of the city's and the region's highways and roads cannot be discounted. The conceptual bridge across the James River could provide commuters (whether by car, bus, bike, etc.) living in eastern Henrico with easy access to I-95 and into the city, as opposed to further exacerbating the congestion along Route 5 and E. Main Street.

- 8.n Council Requested Amendment: Significant changes were made between the draft and final plan to the Future Land Use Map for Shockoe Bottom and Riverfront, impacting things like maximum height limits. And it is not clear how the Master Plan fits with the Shockoe Small Area Plan that is under development and the proposed Shockoe Bottom Memorial Park. Very concerned developers may seek rezoning and proceed under Richmond300 (which lacks maximum height limits and detailed commitments to the memorial park) before the Small Area Plan can be adopted. At the very least, would recommend a targeted amendment to the Future Land Use Map (Figure 11, p. 53, and Figure 18, p. 85) to make it clear that the Future Land Use map will be amended in accordance with the Shockoe Small Area Plan and amend bullets on pages 32 and 189 to make it clear that rezoning in the Shockoe area will be in alignment with the Shockoe Small Area Plan.

Response: **Already in the plan.** The “Primary Next Steps” for the Downtown-Shockoe Node already states, “Implement the recommendations in the Shockoe Small Area Plan, some of which include: Complete and adopt the Shockoe Small Area Plan (which is under development), as an element of Richmond 300” (p. 32).

- 8.o Council Requested Amendment: Inclusionary zoning: The City should encourage use of its density bonus program in neighborhoods to increase the supply of affordable housing in new market rate multifamily developments. Additionally, we need to protect the public housing that exists and not continue mass evictions, given the unstable nature of our world in the global pandemic, in order to create enough vacancy to demolish the projects for private sector mixed income units that have significantly less oversight.

Response: **Out of scope.** The City administration is currently rewriting the Affordable Density Bonus Program in order to make it more effective at providing affordable housing units. There are many such strategies in the Inclusive Housing section of the plan.

- 8.p Council Requested Amendment: Strengthening mass transit: As the transportation sector accounts for almost half of our carbon emissions in the Commonwealth, it is important that Richmond lead the way on a robust mass transit system in order to reduce the dependency on single occupancy vehicles, thereby mitigating climate change.

Response: **Already in the plan.** There are many such strategies in the Equitable Transportation section of the plan.

- 8.q Council Requested Amendment: State explicitly that Oregon Hill should retain its current R-7 residential zoning. This is intended to convey Oregon Hill's desire to retain its R-7 zoning because Neighborhood Mixed Use does not reflect the actual conditions found in Oregon Hill.

Response: **Out of scope**. The plan does not make zoning recommendations, either explicitly or in the Future Land Use map.

- 8.r Council Requested Amendment: Future Land Use- the proposed future land use continue the 30%-40% historic land use patterns for single family homes on large lots. For the City to grow, increased land mix-use provides the best option of high quality community places, increased population growth with a mix of housing choices, with less car dependency, increased businesses and job growth and enhance the per capita to attract quality neighborhood with food and finance anchors. The following amendments increase neighborhood mix-use, destination mix-use, adds institutional in the industrial future land use, and enhances corridor mixed-use.
- Response: **Out of scope**. The Future Land Use map is reflective of existing conditions, and most single-family neighborhoods do not want multi-family developments, though there are ways of adding housing units to these neighborhoods. The "Residential" Future Land Use categories lists "Single-family houses" and "Accessory Dwelling Units" as Primary Uses, and "Duplexes and small multi-family buildings (typically 3-10 units)" as Secondary Uses.