

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 are following up on our July 13, 2020 letter (attached hereto) with certain additional comments.

As we noted in our July 13 comments, we believe that Goal 5 should be revised.

Goal 5, as drafted, seeks to “Increase public knowledge of planning processes.”

However, increasing public knowledge of planning processes is not the same as fostering greater transparency and public participation in the planning process.

Increasing public knowledge of the planning process is important, but public confidence in that planning process will be eroded once the public appreciates that they will not be able to participate in planning decisions impacting where they work, live and play after this plan is implemented.

We recommend that **Goal 5 should 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.

In addition to our significant concerns over the weakening of the community voice in planning processes, we note that dramatic changes have been made since the June 2020 draft plan to the Future Land Use Map for Shockoe Bottom and Riverfront. These last minute changes proposed as a *fait accompli* are alarming to us. Our comments follow:

- In Shockoe, much of the land has been converted from “Neighborhood Mixed Use” to “Destination Mixed Use” and “Corridor Mixed Use” since the June 2020 draft plan. This is a significant change, one which will adversely impact the rare surviving historic fabric of the neighborhood. In this regard, we note that there is a core area of Shockoe Bottom with significant intact historic fabric, such as Masons’ Hall (1785-87), the Adam Craig House (1784-87), the Pace King House (1860) and the Belle Bossieux Building (1878), with a number of other buildings dating to the first half of the 19th century. **We recommend that this core area (generally between 17th and 21st and Main and Broad Streets) be converted back to Neighborhood Mixed Use or to “Community Mixed Use” to better protect the historic fabric and character of this neighborhood.** (We will defer to the Shockoe Alliance and its constituents such as the Sacred Ground Project as to whether Destination Mixed Use is the appropriate category for the

parts of Shockoe centered around Lumpkin's Jail/Devil's Half-Acre and the Shockoe Burial Ground.)

- In addition, we note that Destination Mixed Use is intended to have buildings with a minimum height of five stories. This will dwarf the surviving historic fabric of Shockoe. **In order to more appropriately respect the smaller scale of surviving historic fabric, we recommend that additional language be added on page 64 of the plan to the "Intensity" section of Destination Mixed Use** (similar to the Intensity descriptions for other Land Use Categories) as follows: *"New buildings that are taller than historical buildings should step back from the build-to line after matching the height of the predominant cornice line of the block."*
- For the Riverfront/Rockett's Landing, the area has been converted in the latest Future Land Use Map from a combination of Neighborhood Mixed Use and Public Open Space to Corridor Mixed Use. This is a dramatic departure from the Riverfront Plan, the Pulse Corridor Plan, and the earlier Future Land Use maps vetted during the Richmond 300 process. **These changes to the Riverfront/Rockett's Landing Future Land Use need to be reversed or deferred.**
 - In particular, the Pulse Corridor Plan acknowledges the importance of the "view that named Richmond." The Pulse Corridor Plan requires "respecting the viewshed of the "view that named Richmond" from Libby Hill Park to the James River." A process for protecting the View through a Plan of Development Overlay was initiated in January 2020 but has not yet been completed. **These changes to the Future Land Use Map would eviscerate all efforts to protect the View and contradict multiple prior planning efforts to preserve a unique, beautiful and authentic element of Richmond's historic environment.**
 - Fulton Gas Works also is a particularly important site with a rare and important gasometer dating to the 1880s. We note that the Pulse Corridor Plan called for preservation of the historic gasometer and the Fulton Gas Works building as well as Section 106 review for historic resources. The Future Land Use map in the June 2020 draft Richmond 300 plan showed this site as Public Open Space. We now understand that no Section 106 review is intended for this important riverfront site. We have lobbied for at least a public meeting to discuss this site. We understand that public meeting will be held as part of a Council Member's District Meeting on October 14. This site is so important – and the changes reflected in the Future Land Use Map for the Riverfront are so dramatic – that these changes should be vetted through a Richmond 300 process community

engagement effort. **Any change from the Public Open Space category for Fulton Gas Works should happen only after a significant public engagement process.**

- We recommend reversing the changes made in the most recent version of the Future Land Use Map for Shockoe and the Riverfront/Rockett's Landing. To push through changes of this magnitude without community engagement at this time is inappropriate.

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.

We are grateful to the staff of the City Planning Department and Richmond 300 team for their efforts to produce this plan. 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 or Elisabeth Price at eprice@historichrichmond.com with any questions regarding this letter.

Sincerely,
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