



**The Chesapeake Bay Foundation Has Submitted Comments Opposing Rezoning of Fones Cliffs and Lukes Island to Allow for a Hotel and Conference Center, Golf Course, and over 700 new Homes and Businesses**

CBF has worked to protect and restore the Chesapeake Bay and the Rappahannock River for almost 50 years. We



do not oppose development, but we believe development should occur on a scale, in a manner, and in a location that protects our shared natural resources and human health.

**Richmond County’s Comprehensive Plan** states that its purpose is to protect the rural, agrarian way of life and to promote new development in areas that are either located near needed infrastructure or already developed. The proposed project is far from existing development or infrastructure and thus, violates the County’s Comprehensive Plan. It will create the impetus for more, sprawling development across farms

and forestland and along riverfront areas. If rezoned, the land could be sold to another developer who could propose even more intense development.

**The Chesapeake Bay Preservation Act** was passed to protect Virginia’s waters from pollution that runs off the land due to development. To improve water quality and still allow “reasonable development to continue,” the County may require a water quality impact assessment (WQIA) for projects that affect unique and sensitive sites. The County has not required a **WQIA** for this development. Given the scope of the project and the lack of information provided by the developer, we have asked that such an assessment be undertaken before any rezoning decision is made.

Fones Cliffs is one of a kind with the largest concentration of **bald eagles** in the Mid-Atlantic Region. **Captain John Smith** was attacked by Native Americans shooting arrows from the cliffs. Cutting down trees, grading over 100 acres of land, and building hundreds of new homes will destroy eagle habitat and the cultural heritage associated with Captain John Smith’s historic voyage.

The proposed development will be located on the top of sensitive cliffs, some close to 100 feet high, along the River’s edge. Deep ravines run throughout the property which lead to extensive and valuable ecological resources—streams and wetlands. The development will—no matter how well the **runoff** is managed during and after construction—dump new loads of **sediment and pollutants** into these areas and the river.

**Sewage** generated by the new residents, horses, golfers, and others must be treated on-site. There is no existing wastewater treatment system. The developer has said it will develop an on-site treatment system, but has not

disclosed where it will put such a system, or how it will be operated, maintained, or paid for, let alone how it will be allowed to discharge more pollutants into the Rappahannock River.

The project **will not generate the revenue to the county** as suggested by the developer. We hired two outstanding consultants, Chmura Economics and Analytics and Neal Barber of Community Futures, to study the potential financial impacts on the county. Both concluded that the project would present substantial costs to the county and that the county would lose school funds. The project would not increase tax revenues anywhere near the levels suggested by the developer. In fact, many of the developer's statements concerning financial growth contradict themselves. For example, the developer says that all the new homes will be second homes, but then counts all of the expected new cars as revenue for the county due to a tax that is only assessed to the principal residence. The developer also suggests that no new students will come

to the county with the development. We all know there is no way to predict what kind of families will come to the county, but it is highly likely new students will come to the county with the development.

In short, the Fones Cliffs development project is the wrong size and location for the property and will not bring the economic return to the county as the developer states. There are better uses for the property that could provide jobs and revenue, but do not carry the risks to the environment or the fiscal health of the county. Thus, the current zoning designation should remain.



**CHESAPEAKE BAY FOUNDATION**  
*Saving a National Treasure*