



April 19, 2021

Dear Members of the Planning Commission:

The Church Hill Association has recently learned of the proposal to construct a 12-story building at 1801 E. Main Street. We ask that you not approve the zoning change requested at this time.

Over the past several years, our members have been actively involved in all of the various planning processes that affect the future of our east end neighborhood, including Shockoe Bottom, our immediate adjacent neighbor to our south and west. From the beginning of the Pulse Corridor Plan and all through the passage of the Richmond300 Master Plan, and now the in-progress Shockoe Small Area Plan, we have offered comments, articulated suggestions and solutions to some of the more detailed issues of all these plans, with a particular focus on recommended neighborhood character areas, building heights and zoning - all which have to be implemented properly in order to preserve the historic character of both Church Hill and Shockoe Bottom while allowing for future development that is congruent with these historic neighborhoods.

This project before you today is not in line with the draft Shockoe Small Area Plan (Plan) that we and so many others have been a part of, and seems clearly out of step with the historic Shockoe Bottom neighborhood.

Our primary concern is that the proposed building height of 12 stories is out-of-line with the draft Shockoe Small Area Plan, and approving this project now, before the Plan has time to be fully adopted, gets ahead of the process, and would set a precedent for other parcels. This would be out of sync with the intent of the Plan and the long-time efforts of those involved in preservation of this area of the City.

Historic East Main Street is characterized by two and three story buildings along most blocks, with some newer buildings approved at four and five stories. The applicants for 18th and Main are proposing TOD-1 zoning which would permit a 12-story building. While they have proffered 11 stories, that is still beyond the limits set in the draft Shockoe Small Area Plan.

This zoning is inappropriate according to the drafts we've seen for the Shockoe Small Area Plan which is recommending B-5 (5 story maximum) for the historic core areas, including along East Main Street. It is also inappropriate for the following additional reasons:

- 1) The Pulse Corridor Plan did not identify parcels along East Main west of I-95 for TOD-1 zoning. It identified parcels to the west of I-95. Therefore, this parcel is not eligible for TOD-1 under the Pulse Corridor plan. It did designate this stretch of East Main Street as Corridor Mixed Use, with a maximum of 10 stories.
- 2) Surrounding parcels are B-5 and another recent application at 22nd and East Main Street took account of this and has applied for a five story building under B-5.

3) The Richmond300 Plan designated Shockoe Bottom “Destination Mixed-Use” as a result of a late staff change to the plan made at the request of business groups, which we opposed. Even so, while Destination Mixed-Use sets a minimum height of five stories it does not specify a maximum and the Richmond300 Plan stresses repeatedly that heights and zoning should take account of historic areas and their context. Therefore, under Richmond300, the City has significant discretion to limit heights within historic Shockoe Bottom.

4) Approving TOD-1 would create a precedent for other parcels along East Main and in the historic core of Shockoe Bottom. In the absence of a City Old and Historic District, or another type of Design Overlay District, it could result in the assemblage of smaller parcels to create much larger and taller buildings including via the purchase and tear-down of two and three story historic buildings.

The constant shifting of planning designations for Shockoe Bottom between the Pulse Corridor and Richmond300 plans results in significant confusion as to which plan is guiding development in Shockoe Bottom. The Shockoe Small Area Plan should be the guiding document for future development and should be used to inform and guide development initiatives presented in the interim until it is passed.

For these reasons, the application for TOD-1 for the proposed development at 1801 E Main Street should be denied by the Planning Commission in view of on-going discussion of the Shockoe Small Area Plan.

Sincerely,



Alli Alligood
President