

May 3, 2021

**Testimony to City of Richmond Planning Commission regarding Ord 2021-102 proposed rezoning of properties in the northwest quadrant of Oliver Hill Way (17<sup>th</sup> Street) and East Broad Street**

My name is Stewart Schwartz, and I am the President of the Partnership for Smarter Growth. While we support in principle the application for rezoning to TOD-1, we also urge deferral until passage of the Shockoe Small Area Plan. In lieu of deferral, we request that public review and comment opportunity be provided for the subsequent submission of a site plan and design.

We have been involved with planning issues in Shockoe Bottom since 2014, calling then for a small area plan with extensive public engagement. The ULI Rose Center's expert team also recommended extensive community participation in the planning of the future of Shockoe Bottom. Now finally, seven years later, a small area plan is nearing completion. We have been monitoring the meetings of the Shockoe Alliance and their draft plan including the staff proposal for zoning and heights in various parts of Shockoe Bottom. The staff proposal would allow for TOD-1 north of Broad, which we support in this part of Shockoe Bottom.

A separate TOD-1 proposal is before you for 18<sup>th</sup> and East Main Street in the historic core of Shockoe Bottom, a project which you have temporarily deferred. This project is much more problematical. The staff proposal is for B-5, 5 stories in the historic core of Shockoe Bottom, and this project should definitely wait until completion of the plan and resolution of outstanding issues.

To be consistent we urge that all rezonings be deferred until adoption of the small area plan.

Our other concerns at this time include:

- 1) This application and other rezoning applications do not require the submission of site plans that provide at least conceptual detail on what the applicant is proposing to build. The Plan of Development requirement comes too late in the process and lacks any public input whatsoever.
- 2) In addition, as we have repeatedly called for, city plans and rezonings should include room for density bonuses for affordable housing. Once again, we have before you major rezoning before you with no affordability built in.
- 3) Along with other advocates we have repeatedly requested that development in Shockoe Bottom be accompanied by archaeological investigation and other measures to document and commemorate historic resources found on site or known to have taken place on site – acknowledged through plaques with photographs, etc.

At the same time, we are in support the developer's intention to build as close to the existing sidewalk build line as possible, and disagree with DPW's proposed design for Shockoe Streets, particularly the configuration for 18<sup>th</sup> Street, an issue we have repeatedly raised with DPW. DPW's design is simply too

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wide and undermines the historic street fabric. Their design is focused on moving more cars into the city at a time when we should be rewarding development in the city and those who will live here. The Shockoe Streets plan also got out ahead of the Shockoe Small Area plan and both historic preservationists and the development community have raised concerns about it. The Shockoe Alliance has written to DPW with their concerns and we urge the Planning Commission to oppose the Shockoe Streets proposal and to seek redesign of that in keeping with the goals of the Shockoe Small Area Plan. It may be that there will still be some additional right-of-way needed but certainly not to the extent currently claimed.

Deferral of the rezoning would allow time not only for completion of the small area plan but to also work out the issues we have flagged.

## **Conclusion:**

As I mentioned at the outset, for the reasons above, while we support TOD-1 in this location, we urge deferral of this rezoning until the adoption of the Shockoe Small Area Plan. Should you decide to go forward we urge you to include two findings:

- 1) To distinguish this proposal from the one at 18<sup>th</sup> and East Main. Unlike this proposal which conforms to the staff's draft proposal for zoning and heights, that project does not. That project lies in the historic core where the staff has proposed B-5, 5 stories, as more appropriate.
- 2) To require submission of a site plan with conceptual designs for public review and comment.

Thank you,

Stewart Schwartz  
President