



4 East Main Street, Suite 1C
Richmond, Virginia 23219

Tel: 804.643.7407
Fax: 804.788.4244

www.HistoricRichmond.com

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August 16, 2021

Kim Chen
Senior Manager
Office of the DCAO
Economic Development and Planning
900 E. Broad Street, Room 1603
Richmond, Virginia 23219

Maritza Pechin
Manager, Office of Equitable Development
Deputy Director, Dept. of Planning and Development Review
900 E. Broad Street, Rm 511
Richmond Virginia 23219

Re: Draft Shockoe Small Area Plan, dated July 19, 2021

Dear Ms. Chen and Ms. Pechin:

Thank you for the effort you have devoted to producing the July 19, 2021 draft Shockoe Small Area Plan. We truly appreciate the thoughtful approach to developing a positive vision for this important historic district and for including an extensive and comprehensive discussion of the history of Shockoe, its development, and its architecture. You also have included wonderful photos, maps and other visuals. This should be required reading for any who seek to understand the history of our city.

Shockoe is one of Richmond's oldest neighborhoods and has been the focus of many of Historic Richmond's preservation efforts. In 1935, our founders purchased the Adam Craig House to save it from destruction. Over the past decades, several buildings in Shockoe were saved through our Revolving Fund. We also advocated for listings as a National Register District and City Old and Historic District. More recent efforts include: providing technical and financial support for restoration work on Masons' Hall; coordinating stabilization efforts for the Winfree Cottage; advocating for a form-based code and the construction of a heritage site commemorating the history of the slave trade and the lives, contributions and sacrifices of enslaved persons. We have participated in the work of the Shockoe Alliance to develop this draft Plan by providing comments and by participating in numerous public and small group meetings to discuss the draft Plan.

Vision

We support the Plan's vision for Shockoe to be a *"welcoming, inclusive, diverse, innovative, equitable, and thriving community; honoring and commemorating its past and ensuring a high quality of life for all."*

Heritage Campus

We support the "Big Move" to develop a Heritage Campus. We are at an exciting time in our City. This shared vision for Shockoe - with the Heritage Campus as the central feature of a diverse and dynamic district - can produce great things for Richmond. Not only can it link to the other key sites within Shockoe, but it can also connect to the broader narrative of Richmond, the Commonwealth of Virginia and the nation. Moreover, development of the Heritage Campus can be catalyst for economic development for the neighborhood and the City. The Heritage Campus plan must include the development of a Memorial Park with a publicly-driven vision and design centered on the Lumpkin's Jail/Devil's Half Acre and the African Burial Ground sites. Another primary element must be the Museum of the American Slave Trade. In this regard, we are grateful to the advocacy and efforts of the descendant community, the Sacred Ground Historical Reclamation Project, and the Slave Trail Commission, among many others. We also recognize that the development of a Heritage Campus is a significant undertaking that will require a significant amount of planning, as well as public funding. We support prioritizing planning efforts for a Heritage Campus. These planning efforts must be informed and accompanied by robust community engagement with the descendant community.

History, Historic Buildings and Culture

We support Goal 1 of this Plan to "support growth that preserves the historic urban fabric and enhances an understanding of Richmond's multi-faceted past." This goal was drawn from the Richmond 300.

Growth at the expense of an understanding of Richmond's multi-faceted past is counter to this goal. For that reason, this Plan must include goals, objectives, implementing mechanisms and policies for the protection, preservation, restoration and commemoration of buildings and sites that contribute to Shockoe's unique and important role in the history and culture of Richmond, Virginia and the United States.

Shockoe's story is complex, with many layers. Shockoe is the valley where Richmond began. It served as the commercial and industrial heart of the City for hundreds of years and many of the oldest surviving residential, commercial, industrial and civic structures in the City are concentrated within the study area. These surviving structures tell us much about the people who lived, worked, and congregated here. The entire history of Shockoe must be told, including the story of Virginia's indigenous peoples, enslavement, and the major contribution of Richmond's Jewish citizens and other immigrant populations. Much of this history has been lost, buried or forgotten.

We support the creation of an archaeological ordinance through a community process.

We support the "Priority Project" to hire a Cultural Resource Management Firm to prepare an archaeology context and sensitivity maps for Shockoe and to perform additional research and analysis at the burial ground. We have learned a great deal through recent archaeology in Shockoe, but we also risk losing the opportunity for learning more as development pressure

from public and private projects may create disturbances before sites are able to be evaluated. For that reason, we support not only making this a “Priority Project” but also the engagement of a Cultural Resource Management Firm in Fiscal Year 2022, as set forth on page 203 of the draft Plan.

We support a small expansion of the Shockoe Valley Old and Historic District (OHD) and a Demolition Review Ordinance to protect Shockoe’s surviving historic fabric and as a means of implementing Goal 1. These buildings have survived the vagaries of time, fire and flood, disinvestment and neglect. They were built and used by countless people over the centuries who adapted them for new uses as times changed. Despite all the threats they have faced over the centuries, they have survived and now provide a unique, authentic and beautiful sense of place that can complement both the Heritage Campus and new development on vacant parking lots. To truly understand Richmond’s multi-faceted past, we must protect the surviving historic fabric from demolition.

Smaller scale historic buildings also are providing homes and offices for small and entrepreneurial businesses. The National Trust for Historic Preservation’s recently completed study, *Preserving African American Places*, states that “*older buildings provide residents with more affordable commercial space and housing options – key assets for African Americans and communities of color. ... To keep our cities equitable, accessible and prosperous, with opportunities for all, we must work to reuse older buildings to create more jobs and walkable neighborhoods, supporting more minority- and women-owned businesses and addressing urban issues of affordability and displacement – issues that disproportionately impact African Americans. In short, cities need old building and new solutions for revitalization.*” These smaller scale buildings are thus important for the equitable development of Shockoe. The City’s B-5 zoning district, already used throughout Shockoe, will allow new development and density that is architecturally complementary to, and protective of, the surviving small scale historic fabric.

Demolitions of historic structures in Shockoe have occurred on a regular basis in recent decades. Since the Shockoe Valley and Tobacco Row Historic District was included on the National Register of Historic Places in 1983, approximately 70 “contributing resources” (historic structures) in Shockoe have been demolished. A small expansion of the Shockoe Valley OHD as reflected in Figure 26 on page 113 will help to protect several additional blocks of very old and rare surviving historic fabric from the very real prospect of demolitions. The City OHD guidelines include a form of demolition review, but the Shockoe Valley OHD does not include many of Shockoe’s historic buildings within its boundaries. This proposed small expansion is drawn narrowly to include a small number of the oldest buildings and to provide a protective buffer around them. In addition, the City should adopt a demolition review ordinance delineating a process for owners of historic structures to explore alternatives to demolition. Importantly, the Richmond 300 also includes as an objective such a demolition review ordinance. **The Plan should be revised to initiate the recommended expansion of the Shockoe Valley OHD and the adoption of a demolition review ordinance in Fiscal Year 2022 (rather than FY2024 as set forth on page 203 of the draft Plan). These items should be implemented simultaneously with any larger rezoning of Shockoe.**

We support the Big Move/Priority Project to re-zone Shockoe, but it must be implemented in a manner “to direct growth to appropriate areas while maintaining the existing scale and architectural character of Shockoe” and must not be done at the expense of Shockoe’s irreplaceable historic resources. Getting the zoning right for Shockoe is critical to the success of

the shared vision for Shockoe. We support additional development – equitable development - in Shockoe and believe that the legacy M-1 Industrial zoning is unfriendly for a walkable people centric urban environment and needs to be changed. **We support the map on page 126 (Figure 31) reflecting recommended heights for new buildings and believe that it should be used as a basis for any rezoning of the legacy M-1 Industrial zoning in Shockoe. These heights will allow development of maximum density on many of the district's vacant parking lots while protecting the core historic area with many of the City's oldest historic buildings and the City OHD zoning overlay. Rezoning should occur simultaneously with the archaeological ordinance, the expansion of the Shockoe Valley OHD and the adoption of the demolition review ordinance discussed above.**

- Heights of 2 to 5 stories are shown on Figure 31 in areas with high concentrations of surviving historic structures/resources. This is consistent with the current predominant B-5 zoning district used in these areas and the City OHD zoning overlay for parts of this area.
- Heights of 2 to 8 stories are shown on Figure 31 in the area to become the Heritage Campus. This is generally consistent with the vision for the Heritage Campus. We recommend that any zoning district used for this area should not require any minimum heights for the Burial Ground site.
- Heights of 2 to 12 stories are shown on Figure 31 in areas with large surface parking lots. This would be generally consistent with assigning to these areas the TOD-1 zoning district.

We support the Plan of Development (POD) Design Guidelines initially articulated in the Pulse Corridor Plan and the Six POD Form Elements Adapted for Shockoe. As was recommended by the Pulse Corridor Plan and as was done with the Monroe Ward rezoning, a POD Overlay District should be created for Shockoe with the rezoning. These design elements provide the flexibility to create new buildings that are innovative, varied and contemporary while at the same time maintaining the unique and distinctive architectural character of Shockoe. **This item should be implemented simultaneously with any larger rezoning of Shockoe.**

Housing

Shockoe should be a community where all people can access quality housing choices. **We support Goal 6 to preserve, expand and create mixed-income communities, and foster the inclusion of increased affordable housing and preserving existing housing units and developing new ones – both rental and owner occupied – throughout the city.** We are concerned by the low number of affordable units in the district and that there are almost no owner-occupied residences. We recommend prioritizing some of the policies articulated in Goal 6 to increase the number of affordable residential units, the number of family-oriented units, and the homeownership opportunities. We also caution against a rush to rezone for density without a thoughtful approach to ensuring affordability.

Diverse Economy

We want to see Shockoe become home to a variety of businesses and industries that offer opportunities for quality employment and capital investment. We are pleased to see the Plan include (and support the inclusion of) a range of new and/or expanded incentives in the Plan, including an expansion of the façade improvement program, a special tax district, a

reduction in the Business, Professional and Occupational License fees, and the expansion of the partial tax exemption to rehabilitate smaller commercial storefront buildings in Shockoe, among others.

Thriving Environment

We want to see Shockoe become a sustainable and resilient community with healthy air, clean water, and a flourishing ecosystem. We recognize that flooding and stormwater management are a major issue for Shockoe. **As development and density increase in the area, it must be accompanied by a prioritized focus on increasing the amount of green space and the tree canopy, reduction of impervious surfaces, and flood mitigation efforts.**

Equitable Transportation

We support expansion of equitable transportation, the non-car network and other multi-modal transportation options. We recommend redesigning the Shockoe Valley Streets Project to remain within the existing right of way, particularly on 17th Street and Oliver Hill Way. Historic Richmond, as a consulting party in the Shockoe Valley Streets Project, recommended that the project be redesigned in order to avoid identified historic archaeological resources and to remain within the existing right of way, particularly on 17th Street and Oliver Hill Way. As proposed, the project with its multiple roundabouts and significant widening of 17th Street/Oliver Hill Way adversely affects Richmond's historic street grid by creating a suburban sinuous style in place of the historic rectilinear street grid, giving large amounts of land to the car and ignoring the historic urban setting. The project design, as proposed, not only adversely affects the historic street grid (including the historic "valley roads" of Venable and Mosby Streets) and a number of intact archaeological resources, but also contradicts the health and safety values that we should be striving for in our historic urban core by prioritizing the needs of automobiles and auto traffic flow over pedestrian and bike safety. The proposed project design will unnecessarily expand the interstate highway onto our city streets, complicate the revitalization of the historic Shockoe Valley, further separate our neighborhoods, and reduce walkability and the pedestrian experience. We do not support embedding its current proposed design in the maps throughout this plan.

We are grateful to the City staff and the members of the Shockoe Alliance for their efforts to produce this draft plan. We know this has taken a great deal of time, energy and thought. 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 with any questions regarding this letter.

Sincerely,



Cyane B. Crump

Executive Director

cc: Gregory H. Ray, President Historic Richmond Board of Trustees