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May 26, 2023

Dept. of Planning and Development Review
City of Richmond
900 E. Broad Street, Rm 511
Richmond Virginia 23219
Attn: Kevin J. Vonck, Ph.D., Director
Kimberly M. Chen, Senior Manager

Re: Draft Shockoe Small Area Plan, dated March 2023

Dear Ms. Chen and Dr. Vonck:

Thank you for the effort you have devoted to producing the March 2023 draft Shockoe Small Area Plan. We truly appreciate your thoughtful approach over many years 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.

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, and advocating for a form-based code and the construction of a heritage site commemorating the history of the domestic 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 over several years.

We understand that this plan is being created in tandem with other aspects of the Richmond 300 Plan, including the Cultural Resource Management Plan currently under development. We appreciate the efforts to streamline the Shockoe Small Area Plan by focusing on Shockoe neighborhood-specific concerns and solutions, rather than restating city-wide issues and policy recommendations addressed in the Richmond 300 and other documents. Certain of these city-wide policy recommendations are particularly important for Shockoe. **We urge you to implement those policy recommendations (such as those relating to archaeology and reducing the number of demolitions) concurrently with the Plan’s more specific recommendations for Shockoe, so that valuable historic resources in Shockoe are not left vulnerable.**

Vision

We support the Plan’s vision for Shockoe to be a “*vibrant, mixed-use, urban community*,” anchored by a thorough understanding of every layer of its multi-faceted past.

Heritage Campus

We support the “Big Move” to develop a Heritage Campus. As stated in our previous letter, dated August 16, 2021, positioning the Heritage Campus as the central feature of a diverse and dynamic district offers a unique and exciting opportunity, not just for Shockoe but for the City of 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. We recognize that the development of a Heritage Campus is a significant undertaking that will require thoughtful planning, as well as public funding. These planning efforts must be informed and accompanied by robust community engagement with the descendant community.

Promote Heritage, Culture, and Historic Preservation

We support Goal 1 of this Plan to “memorialize and commemorate the heritage and culture of Shockoe and promote the preservation of historic assets.” 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. While the Heritage Campus is the heart of this endeavor, the historical fabric of the surrounding area is crucial to contextualizing that history and also needs to be protected. Like the history it interprets, the Heritage Campus should be an integral, connected part of the city around it, rather than an isolated, self-contained destination.

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 City’s oldest surviving residential, commercial, industrial, and civic structures 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 a small expansion of the Shockoe Valley City Old and Historic District (OHD) to protect Shockoe’s surviving historic fabric and as a means of implementing Goal 1. As things currently stand, OHDs are the only mechanism to protect against demolition in the City of Richmond. Shockoe’s 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 and authentic 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.

Demolitions of historic structures in Shockoe have occurred on a regular basis in recent decades. Since the Shockoe Valley and Tobacco Row National Register Historic District was listed in 1983, over 80 “contributing resources” (historic structures) in Shockoe have been demolished. A small expansion of the Shockoe Valley City OHD as reflected in Figure 15 on page 55 will help to protect several additional blocks of 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 City OHD currently includes only a minority of Shockoe’s historic buildings. This proposed expansion is drawn narrowly to protect a small number of the oldest buildings and to provide a protective buffer around them. **While Historic Richmond is in favor of this expansion, it is important to note that expanding OHDs cannot be done unilaterally by the city, and that expansion involves a lengthy process with extensive community engagement.**

Shockoe includes many more historic structures that are not protected by the Shockoe Valley City OHD or proposed to be included in its expansion by the Plan. **The City should also adopt a demolition review ordinance delineating a process for owners of historic structures to explore alternatives to demolition, as articulated in the previous draft of the Plan.** Importantly, the Richmond 300 also includes as an objective such a demolition review ordinance. **These items should be implemented simultaneously with any larger rezoning of Shockoe.**

We support the review and protection of archaeological resources throughout the city. 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 the expansion of the Commission of Architectural Review guidelines as a means of addressing the potential effects on archaeological resources. However, we are concerned that this approach may be less effective than the Archaeological Ordinance described in the previous draft of this plan. CAR’s authority is limited to OHDs, meaning that a large number of known archaeological sites of interest in Shockoe would remain outside of its purview and protections. **In addition, archaeology review shouldn’t be limited to city owned land, but also should be incorporated into projects subsidized by the city.**

Grow a Diverse, Equitable, and Inclusive 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, such as 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. We support the revision of the City's tax abatement program to incentivize the preservation and rehabilitation of historic buildings for these purposes. We also support the amendment of the Zoning Ordinance to allow for the transfer of development rights to capture the zoning value of historic structures and protect them from demolition.

People working in Shockoe should be able to afford to live in Shockoe. Shockoe should be a community where all people can access quality housing choices. **We support Objective 2.3 to incentivize the development of mixed-use, mixed-income residential growth to encourage private sector investment in vacant lots, surface parking lots, and vacant buildings, and partner with the private sector and non-profits toward improving affordable housing options and inventory, targeting 60% and below the Area Median Income (AMI).** We are concerned by the low number of affordable units in the district and the fact that there are almost no owner-occupied residences. We recommend prioritizing some of the policies articulated in Objective 2.3 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 and implementing meaningful financial incentives to help cover the costs of creating and maintaining that housing and to incentivize the development of mixed income projects and a diversity of housing choices.

While the items listed within this objective focus on future development, it is worth noting that smaller scale historic buildings also provide 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. **Some mechanism for the protection of these structures should be put in place before the majority of Shockoe is rezoned.**

Create High-Quality Places

We support the Big Move/Priority Project to re-zone Shockoe, but it must be implemented in a manner that "directs growth to appropriate areas while supporting the historical 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. Per the Future Land Use map, the majority of Shockoe will be Destination Mixed Use, with a minimum building height of five stories. In light of the new hydrology report, buildings of even five stories may be inadvisable in certain areas, and buildings much taller than five or six stories would be inappropriate in the historic district. **Rezoning should occur simultaneously with the creation of protections**

for historic resources, including the expansion of the Shockoe Valley City OHD, a demolition review ordinance, and an archaeological review process.

We support rezoning to incorporate the Six Form Elements as illustrated in Figure 16 on p. 61 (note typo with page reference), encourage excellence in design with high-quality materials and well-executed architectural details, include a mix of compatible uses by right, add Street-Oriented Commercial and Priority Streets to support walkability and mixed uses, and allow increased heights where appropriate, with step backs and set backs to ease the transition between lower historical buildings. 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.

Equitable Transportation

We support expansion of equitable transportation, the non-car network and other multi-modal transportation options. We support the preservation of the area’s historic gridded street and alley network. 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 most recently 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. **We hope that the Shockoe Valley Streets Project has been abandoned, or if not, that it will be redesigned so as to reflect our comments if it moves forward.**

Since the process for developing the plan began, the City has announced plans for Mayo Bridge and Mayo Island. **Objective 4.5 should be augmented to focus on connectivity and pedestrian, bike, and transit connections on and across Mayo Bridge and Mayo Island.**

Sustain a 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. Historic building patterns are more environmentally friendly, featuring more pervious surfaces and creating less runoff. **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.**

We are grateful to the City staff and the members of the Shockoe Alliance for their efforts to produce this draft plan and develop a consensus around a shared vision for Shockoe. We know this has taken a great deal of time, energy and thought over many years.

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@historicrichmond.com with any questions regarding this letter.

Sincerely,



Cyane B. Crump
Executive Director

cc: Martha Warthen, President Historic Richmond Board of Trustees

