



PRESERVATION VIRGINIA

February 5, 2019

Board of Architectural Review, Old and Historic District
City of Alexandria
City Hall, 301 King Street
Alexandria, Virginia 22314

RE: BAR jurisdiction and 619 S. Lee Street (Hugo Black House)

Dear Chair Kelley and Members of the Board:

Thank you for the civic role you play in assisting the City of Alexandria in the preservation of its authentic historic resources. The function of the Board of Architectural Review, to sensitively and thoughtfully guide changes in its self-identified places of significance, is often not an easy task; decisions that rely on zoning ordinances, legal protections like easements, and location-specific guidelines must be well-informed and defensible. As a senior member of Virginia's statewide historic preservation organization and an experienced architectural review board member myself, I am writing today as a colleague and peer, in response to multiple inquiries our Public Policy Committee has received regarding the Hugo Black House.

Preservation Virginia is very concerned about the extent of alteration being considered for the Hugo Black property. We believe that the proposed alterations represent irrevocable changes to significant architectural and landscape features and characteristics and are likely to result in an adverse effect on the integrity of the property and the district in which it is located.

Without addressing specific design issues or details with the submission material intended to be reviewed by the board on February 6, I would like to speak to the role of the BAR as it relates to input or preliminary recommendations provided by the Virginia Department of Historic Resources (DHR). As Director of Preservation Initiatives and Engagement, I partner with DHR's staff and leadership on nearly a daily basis. For the past several years, we have worked jointly to provide review board and Certified Local Government (CLG) training for localities across the Commonwealth. Such workshops often address the authority of the locality to create, review, and enforce its own preservation guidelines within a larger statewide and national context consistent with the Commonwealth's enabling legislation. As a review and compliance state agency that relies solely on the reading of information it receives from applicants, DHR's recommendations should be weighed carefully at the city or county level based on the nature and completeness of the information supplied. DHR's position does not automatically supersede local decision-making processes; in fact, DHR has no jurisdictional authority over local decision-making. In some instances, DHR and a locality may possess different information and materials and be at different stages in their reviews and decision-making.



PRESERVATION VIRGINIA

In the case of the Hugo Black House, it appears that **new information** has come to light since DHR's original, preliminary review of plans to perform selective demolition and addition of new structures on the site. Information about the originality of the "curve" where the ell joins the main block of the house, as well as additional research on the easements protecting the property and its landmark status, warrant (re)consideration at DHR's level and, most importantly, at the local level in the light of Alexandria's existing zoning ordinances and Old and Historic District guidelines. The level of review afforded the BAR by these ordinances and guidelines is more powerful and legally defensible than a preliminary "approval" from DHR. In other words, it is the BAR's responsibility to consider existing easements and its own guidelines in full in order to responsibly and reasonably mediate changes proposed to be made to this significant property.

Sincerely,

Justin A. Sarafin