

**16 July 2025**

**Subject: Comments on Draft Design Guidelines (Docket item #17)**

Dear Chairman Scott and Members of the Board,

I appreciate the opportunity to comment on the draft Design Guidelines chapters for the Old and Historic Alexandria District (OHAD). These updated drafts represent the most significant opportunity in decades to improve and modernize a document that directly affects thousands of residents and businesses.

While the new drafts include valuable updates, issues with clarity and consistency undermine their utility and effectiveness. As an OHAD homeowner who has personally experienced the consequences of ambiguous guidelines, I urge the Board to pause adoption and instead open a period for public review and targeted stakeholder input.

These guidelines are a substantial rewrite that will shape important decisions—by homeowners, businesses, contractors, and the Board—for years to come. They need to be easily understandable to non-experts and structured to promote consistent, objective decisions. Public input at this stage is critical to ensuring they meet that goal.

My concerns are not with the substance of specific rules, but with how clearly and effectively the guidelines communicate their intent. Many of the issues I found reading through the new chapters—such as inconsistent language, unexplained terminology, and vague standards—have been carried over from the original Design Guidelines and current Administrative Approval Policies. This revision represents a rare opportunity to improve clarity and alignment across all BAR documents in a way that would benefit everyone involved—applicants, Staff, and the Board alike.

**A. Inconsistent Language for Standards**

A core function of the Design Guidelines is to establish consistent standards for when features or materials should be repaired versus replaced. Consistent standards start with consistent language. However, between the new chapters, the original Design Guidelines, and the existing Administrative Approval Policies there are more than a dozen different phrases used to describe this threshold, including: “beyond reasonable repair,” “repair is not feasible,” “too deteriorated to repair,” and “repaired when possible.” (See attached list.)

These inconsistencies appear:

- Between documents (e.g., policies versus new guidelines discussing the same material)

- Within documents (about different materials or features)
- Even within individual chapters (about the same type of feature)

Such variation creates uncertainty, leaving the reader wondering if these phrases reflect distinct differences in standards or simply inconsistent editing. A single, standardized phrase (or set of phrases), used throughout all BAR policy and guideline documents, would improve clarity, cohesion, and integrity.

## **B. Confusing Wording and Presentation**

The guidelines are intended for use by the general public, not just preservation professionals. While the drafts include useful background and a glossary, it still contains unexplained terms, shifting definitions, and convoluted phrasing that can easily confuse readers.

Consider these four excerpts from the *Windows and Shutters* chapter describing BAR policy:

- **Page 6:** “The Board encourages the retention and repair of historic windows whenever possible.”
- **Page 6 (Under "All Buildings"):** “Window frames, sashes, and glass should be repaired rather than replaced when possible.”
- **Page 7:** “Historic windows on Early buildings should be repaired rather than replaced (Type 1, 2, and 3). Replication in-kind (Type 4) is encouraged where the windows are historically or architecturally significant.”
- **Page 7:** “Windows on Later buildings can generally be replaced, but windows that are historically or architecturally significant should be repaired or replicated in-kind.”

While each statement on its own may make sense, the cumulative effect is confusing, somewhat contradictory, and hard to follow. The first sentence suggests there is a singular policy to preserve all historic windows, whereas the second suggests only certain parts of windows—of any age on all buildings—are important to preserve, while the last two indicate the policy really only applies to certain subsets. The latter two sentences are also convoluted and include important terminology (“historically or architecturally significant”) that is not explained anywhere. Subtle differences—such as “encouraged” versus “should”—could easily trip up readers.

A visual matrix or flowchart could present these rules more clearly. Expanding the glossary, careful editing for word choice, and consistent use of terms like “original,” “historic,” and “original historic” would improve clarity and readability.

## **C. Vague and Subjective Criteria for Repair Types**

I appreciate the BAR’s effort to create a more systematic approach to assessing window damage in response to our case last year. The new repair typology is a step in the right direction but falls

short of its original goal. The current criteria and descriptions lack the specificity necessary to make consistent, objective, transparent decisions about which windows can be repaired and which cannot.

Effective criteria for this purpose would be:

- **Definitive** – clearly places conditions into specific categories
  - Terms like “may require” are unhelpful because they introduce uncertainty rather than certainty. If a condition might or might not apply, it provides no firm basis for categorization.
- **Observable** – based on visible or tangible markers
  - Statements like “may require removal of the sashes” are also problematic because they represent a conclusion without identifying the conditions that justify it. (How would one know the sash needs to be removed?)
- **Objective** -- uses measurable, quantifiable, or binary indicators
  - When discussing “sections” to be repaired, it would help to specify dimensions (in inches or percentages of total area) that determine when repair or replacement is appropriate.
- **Repeatable** -- different evaluators should reach consistent conclusions
  - The threshold between Type 3 and Type 4 is completely undefined, leaving it subjective. There are no descriptors listed for Type 4 that address how much of what kind of damage requires replication or replacement.
  - The span of conditions that could fall into Type 3 is open to wide interpretation. It could range from a window with 51% of panes broken and no other damage, to a window that requires rebuilding the entire opening, frame, sill, and sashes, plus replacing 100% of panes.
  - The draft does not specify qualifications required for Staff who evaluate windows or any path for outside expertise. Without clear standards for evaluators or any means to validate findings, the process is vulnerable to subjective and questionable outcomes. Defining consistent qualification requirements for evaluators—both internal and external—and allowing outside evaluations based on BAR standards would help strengthen transparency and credibility.

Without effective criteria, clear thresholds, and a transparent process, the evaluation of damaged windows remains primarily subjective. Other historic districts have addressed this challenge with a variety of checklists and decision matrices—tools that guide applicants and reviewers through a thorough, well-defined, evaluation framework. Exploring existing models and best practices could greatly assist in developing a more robust and rigorous version of the repair typology. Photos, as originally planned for this section, would also help.

## **D. Benefits of Public Input**

The lack of meaningful public engagement in this process so far represents a missed opportunity. Throughout the last few years of work, the meetings of the Design Guidelines Committee have been advertised only to a limited audience and have not allowed public participation or comment. It is genuinely surprising that the committee did not seek input from stakeholders from the outset. Gathering feedback from the very people these guidelines are meant to serve could have identified clarity and usability issues early in the process.

Stakeholder outreach or requests for feedback would likely have identified many of the issues outlined here, and perhaps many new or better ideas. Public engagement in this context could also serve as a catalyst for building public understanding of historic preservation practices and broadening support for preservation goals. In addition, the committee could have enlisted support proofreading the chapters; there are 20+ grammar, punctuation, and spelling errors in the *Windows and Shutters* chapter alone.

I urge the Board to pause adoption of the draft guidelines and open a public comment period, with targeted outreach to homeowners focused on clarity, consistency, and readability. A similar review, with a more substantive focus, by local businesses and tradespeople involved in hands-on repair and restoration could help to bolster, clarify, and vet proposed standards in their areas of expertise. A thorough editing would increase the professionalism of the new guidelines as well.

These guidelines have been a major, years-long undertaking. They will shape decisions that have long-term impacts on the historic fabric of the district and the experience of those who live and work here. As such, they deserve the time it takes to ensure they are as clearly written, soundly structured, and usable as possible.

**Thank you for your time and consideration,**

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## A Dozen Different Phrases = A Dozen Different Standards?

All of the following are found in the Administrative Approval Policy, current Design Guidelines, or new draft Design Guidelines chapters to describe the standard used to decide when materials or features can be replaced. The last two appear only in the new chapters; they do not match the language for the same materials used in the Administrative Approval Policy.

- “can be reasonably repaired”
- “repair is not feasible”
- “beyond repair”
- “cannot be repaired”
- “beyond reasonable repair”
- “cannot be reasonably repaired”
- “too deteriorated to repair”
- “intact and restorable”
- “deteriorated beyond repair”
- “severely deteriorated”
- “repaired when possible”
- “repaired whenever possible”