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July 15, 2025

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Alexandria Board of Architectural Review  
Alexandria City Hall  
301 King Street  
Alexandria, Virginia 22314

**By e-mail**

**Re: BAR#2025-00139 - OHAD, Request for alterations and new construction at  
802 & 808 North Washington Street-Supplement for June 16, 2025 Meeting**

Dear Chairman Scott and BAR members:

We write to supplement our prior letters dated May 15, 2025 and June 3, 2025 opposing approval of the proposed addition to be located at 802-808 North Washington Street. We wish to ensure that you have both of those letters before you when considering this project. Unfortunately, they do not appear to be referenced or substantively addressed in the applicant's submission, nor do they appear to be attached to, referenced or substantively addressed in the Staff Report, or included (as of the morning of July 15, 2025) as additional materials for your consideration and as part of the record for your June 16<sup>th</sup> meeting. We therefore attach those letters here.

Because the substance of our objections to the project and its failure to comply with the mandatory requirements of the Washington Street Standards have never been addressed by the applicant or the Staff Report, they remain dispositive. The proposed plans simply ignore the requirements of the Washington Street Standards, and the formal written guidance that accompanies that ordinance.

HISTORIC ALEXANDRIA FOUNDATION

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The Application continues to document inappropriate reliance on non-historic examples of buildings outside the historic district (A4, depicting Gables Old Town and Hyatt Centric King Street), and non-historic buildings constructed before the codification of the Washington Street Standards (A4-312 S. Washington Street). The continued and overt reliance on these obviously inappropriate examples provide conclusive proof that the proposed design fails the mandatory requirements of Alex. Zon. Ord. 105(A)(3).

In addition to our own prior objections, HAF fully supports the thoughtful written statements and testimony provided by the Vice President of NOTICe (North Old Town Independent Citizens association), who, in addition to her leadership role of the relevant civic association, has extensive experience as an architect working in historic districts.

While HAF acknowledges and appreciates the Applicant's addition of its commitment to the restoration of the Historic Second Empire style brick McCauley Family Townhouse (a topic that would be worthy of a BAR public hearing in and of itself), as well as the modifications of proposed brick color, and other attempts to address the concerns expressed by the Board, we respectfully continue our objections to this project because it fails to observe the legal requirements of the Washington Street Standards, and will significantly harm the memorial character of the Parkway, and adversely affect the value and historic character of the neighboring properties.

Thank you for your consideration of our statement.

Respectfully submitted,

Historic Alexandria Foundation  
By:

/s/ Gail C. Rothrock

Chair, HAF Advocacy Committee

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May 15, 2025

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**By e-mail**

**Re: BAR#2025-00139 - OHAD, Request for alterations and new construction at  
802 & 808 North Washington Street**

Dear Chairman Scott and BAR members:

We are writing to object in the strongest possible terms to the application for alterations and new construction for the property at 802 & 808 North Washington Street that is pending on your agenda for May 21, 2025. The proposed design for this massive new structure on the George Washington Memorial Parkway makes no pretense of complying with the enhanced Washington Street Standards applicable to this property. The "alterations" in the plans completely abandon the elements of the previously approved design formulated after extensive consultation with and multiple hearings by the Board of Architectural Review, all to ensure that this entry point to Old Town along the Memorial Parkway did not present precisely the façade requested in this new application. In our view, the proposed change of use does not warrant or justify the abandonment of the many compromises and adjustments so painstakingly worked out in the prior approval to arrive at a new construction plan that would not do irreparable harm the Old and Historic District and the George Washington Memorial Parkway.

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As you know, Historic Alexandria Foundation (“HAF”) was formed in 1954 “to preserve, protect and restore structures and sites of historic or architectural interest in and associated with the City of Alexandria, Virginia, to preserve antiquities, and generally to foster and promote interest in Alexandria’s historic heritage.” In furtherance of this mission, we are vitally concerned with the proper administration of the Zoning Ordinance in the two Historic Districts, the proper functioning and observance of the process and jurisdiction of the Board of Architectural Review (“BAR”), and the preservation of the historic fabric of our City.

Moreover, since HAF is an owner of real estate on Washington Street (410 South Washington Street), we are directly impacted and concerned with the proper application of the Washington Street Standards that are mandated by the City Ordinance and the City’s 1929 agreement with the Federal Government.

Prior review of construction proposals for this property have been extensive and detailed. The BAR reviewed the proposed new construction at three separate concept reviews (BAR Case #2015-0154) on June 17, September 2 and November 4, 2015. Even after three rounds of concept review, numerous meetings were required between the property owner and BAR staff to further refine plans for this property to satisfy the Washington Street Standards. See, e.g., *BAR Staff Report*, Bar Case #2017-00099, Docket #8, BAR Meeting April 19, 2017 at 4. Even that level of consultation and revision still required further refinement and provision of detail before the plans could be approved. See *BAR Staff Report*, Bar Case #2017-00099, Docket #3, BAR Meeting June 21, 2017 at 5 (“Since the April 19, 2017 BAR hearing, the applicant has made a number of refinements based on the BAR’s comments.”).

The new plan proposed for this property has abandoned all of the design elements that were intended to break up the façade of the massive new structure and minimize the adverse effect on the George Washington Memorial Parkway. Indeed, the new plan appears designed to mimic the new structures on the old Potomac Yards property, being indistinguishable from developments along any urban or suburban thoroughfare constructed in the 21<sup>st</sup> century without regard to historic uses or setting.



### EAST (N. WASHINGTON STREET) ELEVATION

Application, Building Elevation 1 (page 8 of pdf).

We do not believe that the application before you satisfies any of the Washington Street Standards required by Alex. Zon. Ord. § 105(A)(3). Specifically:

- 105(A)(3)(a)(1) which requires that “Construction shall be compatible with **and similar to the traditional building character**, particularly including mass, scale, design and style, found on Washington Street on commercial or residential buildings of historic architectural merit.” (emphasis added);
- 105(A)(3)(a)(1)(i)(“Elements of design consistent with historic buildings which are found on the street shall be emphasized.”);
- 105(A)(3)(a)(1)(ii)(“New buildings and additions to existing buildings shall not, by their style, size, location or other characteristics, detract from, overwhelm, or otherwise intrude upon historic buildings which are found on the street.”);
- 105(A)(3)(a)(1)(iii)(“The design of new buildings and additions to existing buildings shall be complementary to historic buildings which are found on the street.”);
- 105(A)(3)(a)(1)(iv)(“The massing of new buildings or additions to existing buildings adjacent to historic buildings which are found on the street shall closely reflect and be proportional to the massing of the adjacent historic buildings.”);

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- 105(A)(3)(a)(1)(v) (“New buildings and additions to existing buildings which are larger than historic buildings which are found on the street shall be designed to look separate and shall not give the impression of collectively being more massive than such historic buildings. This design shall be accomplished through differing historic architectural designs, facades, setbacks, roof lines and styles. Buildings should appear from the public right-of-way to have a footprint no larger than 100 feet by 80 feet. For larger projects, it is desirable that the historic pattern of mid-block alleys be preserved or replicated.”);
- 105(A)(3)(a)(1)(vi) (“Applications for projects over 3,000 square feet, or for projects located within 66 feet of land used or zoned for residential uses, shall include a building massing study. Such study shall include all existing and proposed buildings and building additions in the six block area as follows: the block face containing the project, the block face opposite, the two adjacent block faces to the north and the two adjacent block faces to the south.”);
- 105(A)(3)(a)(1)(vi) (“The massing and proportions of new buildings or additions to existing buildings designed in an historic style found elsewhere in along Washington Street shall be consistent with the massing and proportions of that style.”);
- 105(A)(3)(a)(1)(vii) (“***New or untried approaches to design which result in new buildings or additions to existing buildings that have no historical basis in Alexandria or that are not consistent with an historic style in scale, massing and detailing, are not appropriate.***”)(emphasis added);
- 105(A)(3)(a)(2) (“Facades of a building generally shall express the 20- to 40-foot bay width typically found on early 19th century commercial buildings characteristic of the Old and Historic Alexandria District, or the 15- to 20-foot bay width typically found on townhouses characteristic of the Old and Historic Alexandria District. Techniques to express such typical bay width shall include changes in material, articulation of the wall surfaces, changes in fenestration patterns, varying roof heights, and physical breaks, vertical as well as horizontal, within the massing.”);
- 105(A)(3)(a)(3) (“Building materials characteristic of buildings having historic architectural merit within the district shall be utilized. The texture,

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tone and color of such materials shall display a level of variety, quality and richness at least equal to that found abundantly in the historic setting.”);

- 105(A)(3)(a)(4)(“Construction shall reflect the traditional fenestration patterns found within the Old and Historic Alexandria District. Traditional solid-void relationships exhibited within the district's streetscapes (i.e., ratio of window and door openings to solid wall) shall be used in building facades, including first floor facades.”); and
- 105(A)(3)(a)(5)(“Construction shall display a level of ornamentation, detail and use of quality materials consistent with buildings having historic architectural merit found within the district.”).

We repeat all of these conditions without additional commentary because we believe it is obvious from a review of the 33 page application package that no effort has been made to comply with any of these requirements — and it calls for no further commentary or amplification to make that point than to quote the language of the Washington Street Standards themselves.

Because the proposal has abandoned all of the guidance provided by the BAR through multiple reviews in the past, provides no reason or justification the exterior changes or rejection of prior guidance, and fails to meet any of the Washington Street Standards (or many of the general standards for the Old and Historic District), we urge you to reject this application.

Thank you for your consideration of our statement.

Respectfully submitted,

Historic Alexandria Foundation  
By:

/s/ Gail Rothrock

Chair, HAF Advocacy Committee

cc.

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June 3, 2025

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**By e-mail**

**Re: BAR#2025-00139 - OHAD, Request for alterations and new construction at  
802 & 808 North Washington Street-Supplement**

Dear Chairman Scott and BAR members:

We write to supplement our prior letter dated May 15, 2025 opposing approval of the proposed addition to be located at 802-808 North Washington Street. As you know, your *Design Guidelines* state that "Today, Washington Street is one of the principal defining elements of the Old and Historic Alexandria District as well as a central commercial and retail artery for the City,". Therefore, we believe that it is important that the Washington Street Standards be upheld in the review of this application.

First, we wish to supplement the record before you with the attached copy of the explanatory article by Peter H. Smith, The George Washington Memorial Parkway—A statement of Policy on Memorial Character by the Old and Historic District Board of Architectural Review, Historic Alexandria Quarterly at 7 (Sum. 1999)(copy attached), which we believe adds background and clarity to our belief that, contrary to the Staff report, no reasoned argument can be made that the Application satisfies any of the Washington Street Standards quoted in our prior letter.



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Second, we believe it is important for you to recognize that the applicant has put forth in its application design precedents for buildings that are not located in the Historic District, much less within the stricter standards for Washington Street. See Staff Report at 37 (depicting “Gables Old Town”, located at 500 Block of Montgomery Street outside the Historic District); and (“Hyatt Centric King Street”, located at 1600 Block of King Street outside the Historic District).

As the Design Guidelines for Washington Street expressly state, these examples are not appropriate: “New buildings in the historic district should not create an appearance that have no historical basis in Alexandria,” [Washington Street Guidelines – page 6, Style].

Moreover, regarding Style, the Washington Street standards emphasize that “the styles of new buildings must be compatible with existing historic buildings on Washington Street itself. Examples of architecturally and historically important buildings on Washington Street include the Cotton Factory in the 500 block of North Washington Street, the George Mason Hotel in the 100 block of South Washington Street and the Federal Courthouse in the 200 block of South Washington Street.”<sup>1</sup>

The current proposal can be usefully compared with the plans the BAR ultimately approved for this property in 2017. At that time, the approved elevation from Washington Street appeared as follows:



Certificate of Appropriateness, April 19, 2017, BAR Case #2017-00099 at Sheet A.2.

<sup>1</sup> Washington Street Guidelines – page 5; see also See Smith, *supra* at 3 (citing Christ Church, the Dulaney House and the Carlyle House, as well as the Alexandria Academy owned by HAF, as appropriate examples).

The new plan violates every principle of the Washington Street Standards: it makes copious use of features prohibited by the Design Guidelines: e.g.:

- “Design elements (e.g., windows, doors, materials,) **must be** consistent with **historically significant buildings on Washington Street.**” Guidelines, Ch. 7, at 6 (emphasis added) — totally inappropriate modern windows.
- “Traditional fenestration patterns and solid/void relationships **must be used** on all facades viable from any public right-of-way, including the first floor.” *id.* (emphasis added) — inappropriate fenestration patterns
- “The color proposed for new buildings or addition should be compatible **with those used on historic buildings in the historic district.**” *Id.* at 7 (emphasis added). In this regard the use of grey brick proposed is without precedent among the “historically significant buildings on Washington Street, or the historic buildings in district at large.”
- “The massing of buildings **must** closely reflect and be proportional **to adjacent historic buildings.**” This massive block shows no proportional relationship to the adjacent historic townhouse.
- “If new construction includes large buildings, **they must be designed to look smaller.**” Guidelines, Ch. 7, at 6 (emphasis added). This massive monolithic façade looks like it was designed for north Route One



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Finally, we urge you to look to your overall mandate pursuant to the City Charter, which is “to promote the general welfare through the preservation and protection of historic places and any other buildings or structures within the city having an important historic, architectural or cultural interest and other areas of historic interest in the city and through the preservation of the memorial character of the George Washington Memorial Highway.” Alex. City Charter § 9.09(i); see *also* Washington Street Guidelines at 6 (“It is the intention of the new language of the standards for Washington Street to promote neo-traditional architectural style for additions and new buildings.”).

In summary, we urge you to reject this proposal that so clearly skirts the most basic purposes of the City Charter, the Historic Preservation Ordinance, and your Design Guidelines.

Thank you for your consideration of our statement.

Respectfully submitted,

Historic Alexandria Foundation  
By:

/s/ Gail C. Rothrock

Chair, HAF Advocacy Committee

**Attachment:**

The George Washington Memorial Parkway—A statement of Policy on Memorial Character by the Old and Historic District Board of Architectural Review, Historic Alexandria Quarterly at 7 (Sum. 1999)

cc.

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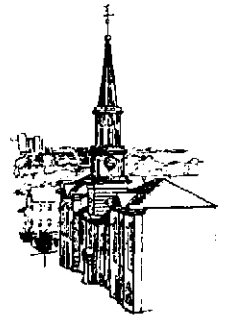
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# Historic Alexandria Quarterly

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Summer 1999



Gunston Hall Apartments, 900 block of S. Washington Street.

## **The George Washington Memorial Parkway-- A Statement of Policy on Memorial Character by the Old and Historic Alexandria District Board of Architectural Review**

by  
Peter H. Smith

*The George Washington Memorial Parkway is treasured by those who use it, as it has been called one of the nation's most beautiful roadways. This road is not without controversy, however, as buildings along the Parkway, specifically in Alexandria, at times have threatened its memorial character.*

*The most recent controversy involves a proposed office building in the north end of Old Town that has been designed for construction in place of the current Old Colony Inn. The original design elicited negative reaction from local citizenry and the Old and Historic Alexandria District of Board of Architectural Review (BAR). On recommendation from the BAR, the design was scaled back and has received conceptual approval by the BAR. Currently, the*

*application for the Development Special Use Permit, which is required for the large-scale building, has been recommended for denial by the Planning Commission. City Council makes the final decision regarding the permit application, which is scheduled to be heard by Council on September 18, 1999.*

In 1928 the U.S. Congress authorized the creation of a "suitable memorial highway" leading from Memorial Bridge to George Washington's Mount Vernon.<sup>1</sup> The George Washington Memorial Parkway was constructed by the federal government as a memorial to Washington on the bicentennial of his birth in 1932. The authorizing legislation did not set any parameters to the memorial highway other than defining its purpose as a memorial road for visitors to

Mount Vernon. As a result, the practical definition of the roadway was left largely in the hands of the original highway's engineers and landscape architects.

As the road and its attendant supporting facilities were designed, the architects and engineers envisioned a roadway that would provide a pastoral, inspirational, and patriotic automobile route from the nation's capital to Mount Vernon. The goal was to create a scene that would arouse a contemplative mood to encourage reflection on George Washington and his importance and significance to our nation.

The George Washington Memorial Parkway was designed to go along Washington Street, the main street of Alexandria. In order to blend the Washington Street section of the Parkway with the desired character of the entire Parkway project, the federal government, acting through the Bureau of Public Roads, entered into a Memorandum of Agreement with the City of Alexandria in 1929.<sup>2</sup> The agreement provided that the city would undertake certain zoning measures to ensure that building activity along the Parkway would be "of such character and of such types of building as will be in keeping with the dignity, purpose and memorial character of said highway." While this noble goal was agreed to by both the federal government and the City of Alexandria, there has never been a written operating definition of conditions that would apply to a building that protects the memorial character of the Parkway.

This lack of a clear policy has created controversy throughout the years. In an attempt to abate the controversy and decrease the confusion, a firm set of parameters and guidelines have been established by the Old and Historic Alexandria District Board of

Architectural Review. The BAR is the local city body which reviews and approves designs for buildings along Washington Street. This article is based on this organization's Statement of Policy on the definition of keeping with the Parkway's memorial character. This statement is meant to supplement the BAR's adopted *Design Guidelines*<sup>3</sup> for Washington Street. The policy statement provides background information for buildings that have been erected on the Parkway since 1932 and derives design principles for proposed new buildings that could be erected on Washington Street in the future.

In the original developmental plans for the Parkway it appears the designers divided the roadway from Memorial Bridge to the entrance of Mount Vernon into three sections: from the bridge to the memorial circle in Alexandria, paved with asphalt; the section that traverses Alexandria as Washington Street, paved with brick; and the southern boundary of Alexandria to Mount Vernon, which was paved in concrete. This construct allowed the designers to respond to the different site and environmental conditions found in each of the three areas.<sup>4</sup>

The Bureau of Public Roads in the Department of Agriculture was responsible for the development of the Parkway, but there was one segment of the sectioned roadway where the agency's engineers and landscape architects were not autonomous, and that was within the boundaries of the constructed City of Alexandria. The alignment of the route passed directly through the City of Alexandria along Washington Street as it does today. The geography posed somewhat of a challenge because Alexandria was primarily an industrial city in the 1930s, and the passage of the Parkway through the urban areas of the city did not befit the goal of a quiet and

reflective parkway. The urban nature of the city was fundamentally at odds with the pastoral setting of the Parkway, and the designers had little influence over the landscape within the Alexandria street grid. The project designers were placated, however, by a few conditions and qualifications that existed.

First, because there were extant buildings in Alexandria that were associated with the life of George Washington, the new Parkway was automatically given an historically accurate character. For example, Christ Church, the Alexandria Academy, the Dulaney House, and the Carlyle House were buildings which Washington knew and/or visited during his lifetime, and which were on or near the proposed parkway. Thus, the physical preservation of structures associated with Washington was of paramount importance to routing the Parkway through the urban fabric of Alexandria, and the designers recognized that.

Second, the designers knew the memorial character of the Parkway in the city would be maintained because future buildings constructed along Washington Street would have an architectural quality that would contribute to the memorial character. The document which proposed this concept was the 1929 Memorandum of Agreement. This agreement gave the federal government a perpetual easement, or control of property, over Washington Street, and was viewed as the chief instrument to guaranteeing that only the construction of "residential or business development of such character and of such types of building as will be in keeping with the dignity, purpose and memorial character" of the Parkway would be permitted.

Third, the distinction between the pastoral and romantic Parkway and the rigid grid of the

Alexandria street system was reconciled by the design of memorial circles at the north and south ends of the Alexandria grid. These circles served as a physical transition to and from the undeveloped pastoral areas of the Parkway to the highly constructed city. In the end, however, only the memorial circle at the north end of the city grid was actually constructed. It is not known why the memorial circle on the south end was not constructed. It is possible that a roundabout at the south end of the city at Hunting Creek may not have been deemed necessary for two reasons: in this area in the 1930s there was more of a gradual and natural transition from the deliberate urban grid to the curvaceous and quiet Parkway because at the time there was no development south of Green Street. Another possibility is the thought that visitors heading northbound, and consequently away from Mt. Vernon, did not have as much of a need to maintain a sense of contemplative reverence since they would be going away from, and not toward, the object of veneration.

Evidence suggests that the City of Alexandria was cooperative with the design and goal of the Parkway, as even before the completion of the Parkway in 1932 city officials had begun routinely referring for comment to the federal government city building permits involving projects which fronted on Washington Street. Initially such permits were referred to the Department of Agriculture. Gradually, the National Capital Parks and Planning Commission (NCPPC) received the permits, and finally the National Park Service was the agency responsible for commenting on the building permits. This confusing process involved these different government organizations as a result of the federal government reorganizing its planning and preservation functions.

After construction of the Parkway was

completed, during the mid to late-30s and into the early 1940s there was a strong burst of residential construction activity in Alexandria and the surrounding metropolitan area, as the federal government launched massive programs to first combat the Great Depression, and later to increase military power with the imminent threat of World War II. Virtually without exception, the participating federal agencies applauded the construction of residential apartment complexes adjacent to the Parkway in Alexandria.

Some of these complexes consisted of extremely large buildings, such as the Mason Hall Apartments on West Abingdon Drive and Hunting Terrace at Washington and South Columbus Streets. Others were smaller and reflected the garden apartment movement, like the Williamsburg Apartments at Washington and Green Streets.



Gunston Hall Apartments, 900 block of S. Washington Street

Despite the variance in size and slight differences in architectural style, all of these complexes shared a common construction vocabulary of a red brick finish with punched window openings. The red brick finish is an important design concept because this style became the ideal architectural characteristic of Washington Street buildings.

While it gave enthusiastic support to the

architectural style of much of the residential construction along Washington Street, the federal government was considerably less sanguine regarding commercial buildings and the advertising signs which had begun to crop up along Washington Street. The National Park Service was so concerned with the commercial character of Washington Street that following World War II officials proposed the construction of an elevated freeway along the waterfront of Alexandria in order to divert Mount Vernon-bound traffic away from Washington Street, which was considered to have lost its semblance of memorial character.



603 S. Washington Street.

Furthermore, the National Park Service considered condemning property along Washington Street that did not meet the desired memorial nature of the Parkway. Either one of these proposals would have been disruptive to the city and would have seriously affected the economic base of Alexandria. In response to these proposals, Alexandria's City Council enacted the third local historic district ordinance in the nation in 1946.<sup>5</sup> One of its chief purposes was "the preservation of the memorial character of the George Washington Memorial Highway" as a means of protecting the city's tax base and also to placate the federal government. While construction proposals along Washington Street still continued to be referred to the National Park Service for comment, it was now the city's Board of Architectural Review that assumed the major burden of protecting the memorial



character of the Parkway after 1946.

At the same time that the Park Service became concerned about the lack of memorial character on Washington Street, the pastoral setting of the Parkway north of Four Mile Run, too, had been inalterably transformed by the federal government with the expansion of what would become National Airport. The airport was constructed immediately adjacent to the ruins of Abingdon, the estate where Eleanor "Nellie" Custis, the adopted daughter of George Washington, was born and which burned to the ground in 1930. The original designers of the Parkway considered Abingdon to be an important component to the sense of reverence along the road to Mount Vernon. During Parkway construction, a scenic overlook was created at the site of the Abingdon ruins that allowed "pilgrims," as Mount Vernon-bound travelers were called, on their way to the "shrine" to view a physical site that pertained to Washington's life. The scenic overlook also provided a sweeping panoramic vista of the broad expanse of the Potomac River to the southeast, which served to remind the viewer of the importance of this waterway to the 18<sup>th</sup> century world of Washington.

During the 1939 construction of National Airport, however, the Parkway was re-routed slightly to the west, and portions of the original Parkway became a roadway internal to the airport itself. As a result, the important symbolic overlook of Abingdon was abandoned. Today, the foundation has been stabilized and remains in the Ronald Reagan National Airport complex between two new parking garages. The site is accessible to visitors and features interpretive signage, but its significance to the Parkway has been overlooked by airport developers.

Directly to the south of the Abingdon ruins,

the Bureau of Public Roads, the very agency responsible for the design and construction of the Parkway, constructed an office and road testing facility on a 54 acre site in 1936. This facility consisted of a U-shaped collection of Georgian Revival style brick buildings that strongly resembled a college campus. At that time, the Parkway passed immediately to the east of the facility on the side closest to the Potomac River. A glimpse of the facility drew comparisons to the reconstructed Governor's Palace at Colonial Williamsburg or the Wren Building at the College of William and Mary. By designing this facility, the Bureau of Public Roads clearly established the preferred theme for the architectural treatment of new construction along the Parkway--buildings of the aesthetically pleasing Georgian Revival style. Indeed, the design of the complex was approved by the Commission of Fine Arts, which praised its architectural treatment.

When the airport was constructed a few years later and the Parkway relocated westward, the orientation of the complex lost its significance because a motorist's view was now of the backs of the buildings, and the colonial flavor of the facility could not be viewed and appreciated. The complex is still extant today, and it serves as a maintenance support facility for Ronald Reagan National Airport. Its original context has been lost completely, and the facility is located amidst the airport surface parking lots and garages.

Moving the Parkway westward during airport construction counteracted an important design element of the original Parkway. One of the principal reasons of keeping the original Parkway alignment eastward and nearer the River from a design standpoint was to avoid the visual intrusion of the Potomac Yard, a railroad classification facility constructed in 1906 which stretched from the area of the



Fourteenth Street Bridge (or Long Bridge) well into the City of Alexandria. By the time the Parkway's construction was proposed, Potomac Yard was reportedly the largest railroad classification facility in the country.<sup>6</sup> The rail yard created not only a visual blight but also an audible intrusion for travelers in their pre-air conditioning automobiles, and the original designers proposed a thick growth of trees on the west side of the Parkway in an attempt to mitigate these negative effects. Thus, the construction of the airport disrupted much of the original design intention of the Parkway when the roadway had to be relocated westward of its original alignment and immediately adjacent to Potomac Yard.

The memorial character of the Parkway has been substantially eroded in other sections as well, specifically to the north of Alexandria, with the construction of highway bridges, office buildings, and parking garages, many of which were built by and for federal government agencies in the last 20 years. For example, the highway bridges that carry the Fourteenth Street Bridge and I-395 over the Parkway do not in any way resonate with the memorial character of the roadway; the structures of METRO immediately adjacent to the Parkway likewise make no concession to the memorial landscape of the Parkway nor to the natural palette of materials used for structures along the Parkway; similarly, Crystal City, the massive office and residential complex adjacent to the Parkway and directly west of the airport, thwarts any contemplative nature. In addition, the prefabricated metal industrial buildings at the maintenance facility constructed by the National Park Service, which is adjacent to the Parkway and directly west of the airport, can hardly be deemed compatible with the memorial character of the Parkway.

As evidenced by the aforementioned

government sponsored projects, the interest of the federal government in protecting the Parkway has waxed and waned since the 1929 agreement with Alexandria. Its interest has often been tied to the personal predilections of the various administrators of the government agencies charged with enforcing the agreement. By contrast, the City of Alexandria has generally proved consistent in its attempts to maintain the vision of a designated memorial Parkway along one of its principal commercial arteries. Through both governmental action and the intense scrutiny of citizen activists, there has been a strong preference for buildings designed in a Colonial Revival style. While this style has been interpreted loosely at times, it normally consists of constructed red brick buildings with doorways framed by pediment surrounds,



First Union at 330 N. Washington Street.

multi-light punched wood windows, and often wood rooftop cupolas.

There have been, however, some noticeable lapses in the city's original embrace of the 1929 agreement, most of which are readily visible at the south end of the Parkway in Alexandria. Gerrymandering of the boundaries of the historic district in 1970

permitted the construction of the Humro office buildings in the 1100 block of South Washington Street (built in 1983), as well as the Porto Vecchio complex (1979). Because both projects were constructed outside the historic district, the Board of Architectural Review did not have jurisdiction to review the designs. Following the construction of these buildings, the boundaries of the historic district were returned to their former points in 1984 and now once more encompass the land where these structures exist. Both the current Zoning Ordinance and the *Design Guidelines* of the Board of Architectural Review would preclude their approval if these designs were proposed today.

There are a number of other buildings on Washington Street which were approved in the past by the Board of Architectural Review that today are considered to detract from the memorial character of the Parkway. These buildings include: the Harris Building at 1201 East Abingdon Drive, which has ribbon windows, an overly large mansard penthouse, and surface parking exiting directly onto the Parkway; the Jefferson Building at 901 North Washington Street, the only overtly modernistic building fronting on Washington Street;



Jefferson Building at 901 N. Washington Street.

and the United Fruit and Vegetable Growers building at 727 North Washington Street with

its ground floor interior parking exiting directly onto Washington Street. These buildings were approved because the BAR was not using the protective guidelines that are used today.

In the attempt to ensure that the memorial character of the Parkway is perpetuated, the City of Alexandria's Zoning Ordinance has mandated design standards for the construction of new buildings on Washington Street since 1990. These standards are even stricter than those applied elsewhere in the historic district. In the last several years there have been a number of new buildings constructed on Washington Street, and all have met the high design standards required by the Zoning Ordinance and the *Design Guidelines*.

Some building designs that have not been approved by the Board of Architectural Review because its members did not think they contributed to the memorial character of the Parkway have been built anyway due to approval by City Council on appeal of the Board decision. This was the case with the Atrium Building at 215 South Washington Street, which uses Colonial Revival detailing on a gargantuan scale coupled with a two story mansard roof. Another example is the building at 300 North Washington Street, which consists of seven stories in height and visually overwhelms its section of the street. Its approval was the result of ineffective height restrictions in the Zoning Ordinance. Since its approval and construction, the height limit along all of Washington Street has been considerably reduced to a maximum height of 50 feet, or approximately four stories.

This review of the history of the George Washington Memorial Parkway on Washington Street shows there is no single standard of what constitutes the Parkway's

memorial character. However, several principles can be derived from original goals and the styles and guidelines that have worked in the past, which should be used as aids and examples for defining memorial character of the Parkway as it passes along Washington Street:

### 1. Preservation of Historic Properties

Of utmost importance is the physical preservation of all properties actually associated with the life of George Washington or his family. This principal is in concert with the City of Alexandria's goal to preserve historic and architecturally important buildings along Washington Street. Consequently, the preservation and interpretation of these buildings binds together the purpose of the Parkway with Washington Street.

### 2. The Memory Test

The principal overriding design objective for new construction on Washington Street is to create buildings which are not overt visual intrusions on the established cityscape. Such buildings must be predominately background buildings that do not seek to make a strong impact on the Washington Street vista. This includes ensuring that these buildings are not visually jarring in scale, mass, materials, or color. The intention of the memory test lies in the concept that by the time one traverses the Parkway and enters Mount Vernon, the principal memory of buildings in Alexandria will be of the surviving historic buildings associated with Washington and not of modern constructs.

### 3. Red Brick with Punched Windows

As demonstrated by this article, due to the lack of a clear policy in the past there is no single architectural building style that is mandated for Washington Street in order to maintain the memorial character of the

Parkway. There are highly regarded examples of historic architectural merit that range from late 18th-century wood frame Federal style townhouses to high style center hall Georgian buildings to a limestone Art Deco style office building constructed in 1930. The designs of these buildings vary, and as a result it should be noted that mere replication of Federal or Georgian style buildings on an exaggerated scale for late 20th-century use is not normally considered to contribute to the architectural patrimony of Washington Street. There should be serious design consideration for Washington Street buildings so that all proposed buildings are not automatically Federal style replicas.

The most common building type on Washington Street, and therefore the one most likely to meet the memory test described in the second principal, is a building which visually expresses the historic red brick in a traditional load bearing manner. In other words, the red brick must be of structural masonry construction that appears to actually bear the load or weight of the building. On Washington Street windows for this building type grew from small Georgian style multi-pane sashes to proportionally larger openings.



700 S. Washington Street.

This trend evolved as improvements were made in glazing technology, and it is reflected in window openings found in buildings of the

Chicago School or Beaux Arts style. In each instance the windows are surrounded by masonry and appear to be "punched" through a solid load bearing masonry wall. By contrast, ribbon windows (a continuous horizontal band of windows) and glass curtain walls that are found on modern office buildings are not appropriate treatments along Washington Street.

The historical treatment of building facades along Washington Street has established a materials palette largely consisting of red brick with surface modulation that includes vertically punched windows which are proportionally appropriate. These traditional building treatments, in addition to a quietude of facade treatment rather than an exuberance of surface ornamentation, give a sense of timeless solidity to construction along the Parkway and a sense of connection to the building materials of Washington's lifetime. In this way, the memorial character of the Parkway can best be maintained, which, as most will agree, is a unique and important historical gift from Alexandria to its residents and visitors.

###

### About the Author

Peter H. Smith is the Principal Staff for the Boards of Architectural Review in the Department of Planning and Zoning. He has a Ph.D. in American Studies from George Washington University. Mr. Smith has written previously for the *Historic Alexandria Quarterly*.

**This issue of the Historic Alexandria is sponsored Mr. and Mrs. Oscar P. Ryder**

### End Notes

All photographs are courtesy of the Department of Planning and Zoning.

1. United States Congress, May 23, 1928, "An Act to authorize and direct the survey, construction and maintenance of a memorial highway to connect Mount Vernon, in the State of Virginia, with the Arlington Memorial Bridge across the Potomac River at Washington."
2. Memorandum of Agreement between City Council of the City of Alexandria and the United States of America, represented by the Secretary of Agriculture, June 20, 1929, Council Chamber, City Hall.
3. City of Alexandria Design Guidelines, Chapter 7 "Washington Street Guidelines," pp 1-10. Adopted by the Boards of Architectural Review, May 25, 1993.
4. EDAW, Inc. for the National Park Service, Cultural Landscape Report, Mount Vernon Memorial Highway, 8 vols., ca. 1985.
5. Ordinance No. 470 to amend Chapter 28, of The Code of the City of Alexandria, Virginia. Sec. 33 "Certificate of appropriateness; its purpose," August 13, 1946.
6. Cox, Al, Historic Structure Report, An Analysis of the Alexandria Union Station, City of Alexandria, Department of Transportation and Environmental Services, 1995, p. 25.



Previous Issues of the  
Historic Alexandria Quarterly:

*Remembering Alexandria's Bicentennial--Philately*  
By Timothy J. Dennee

*The Alexandria Union Station*  
By Al Cox

*Equally Their Due: Female Education in Antebellum Alexandria*  
By Gloria Seaman Allen

*A Study in Decentralized Living: Parkfairfax, Alexandria, Virginia*  
By Laura L. Bobeczko

*The Educational Use of the Property at 218 North Columbus Street*  
By Roland M. Frye, Jr.

*John La Mountain and the Alexandria Balloon Ascensions*  
By Timothy J. Dennee

*Flying the Capital Way*  
By Kristin B. Lloyd

*Recollections of a Board of Architectural Review Member:  
Thomas Hulfish III Reflects*  
By Timothy J. Dennee and Peter Smith

*Volunteers for Freedom: Black Civil War Soldiers in  
Alexandria National Cemetery*  
By Edward A. Miller, Jr.

# Alexandria's 250<sup>th</sup> Anniversary Calendar of Events

## August, 1999

### *August 1, 8, 15, 22 and 29*

Mount Vernon Chamber Series. Free. The Lyceum. 3:00 pm.  
703/838-4994, 703/799-8229.

### *August 2 and 9*

Waterfront Park Concerts. Free. Waterfront Park. 7:00 pm.  
703/883-4686.

### *August 4, 11 and 18*

Lunch Bunch Concerts. Free. Market Square. 12:15 pm.  
703/883-4686.

### *August 4*

#### *through September 6*

The Art League's "The American Landscape Show." Opening reception on August 8. The Art League Gallery, Torpedo Factory Art Center. 703/683-1780.

### *August 5, 12 and 19*

Music at Twilight Concerts. Free. Fort Ward Park. 7:00 pm.  
703/883-4686.

### *August 6*

#### *through September 28*

"George Washington: Profile of a Patriot." New exhibit featuring 19<sup>th</sup>-century prints of Washington, including *Washington Crossing the Delaware* by Emanuel Leutze and other famous, stirring images of the nation's first President. Traveling exhibit from the Mount Vernon Ladies Association. The Lyceum. 703/799-8229.

### *August 6 and 20*

Colonial Games. Children are invited to learn how to play 18<sup>th</sup> century games. Suggested donation of \$1 per child. Carlyle House. 10:00 am-Noon. 703/549-2997.

### *August 6 and 20*

Alexandria Citizens Band Concert. Free. Market Square. 7:30 pm. 703/838-4844, 703/883-4686.

### *August 7*

The Friendship Firehouse Festival. Displays and demonstrations on fire safety and rescue operations. Children will receive balloons, fire hats and birthday cake. Free. The Friendship Firehouse. 10:00 am-3:00 pm. 703/838-3814, 703/883-4686.

### *August 7*

Alexandria Archaeology "Dig Days." Help archaeologists excavate a site. \$5 per person. Reservations required. 10:00 am and 1:30 pm. 703/838-4399.

### *August 8*

Production of "1776," benefit event for the Alexandria 250<sup>th</sup> Anniversary Celebration. \$20 per person. Little Theatre of Alexandria, 600 Wolfe Street. 8:00 pm. 703/838-4554.

### *August 11*

Alexandria 250<sup>th</sup> Anniversary Music Series. Come dance the Lindy! Second Story, Worldbeat, blues and swing music. Free. Landmark Mall Food Court. 6:00 pm-9:00 pm. 703/941-2582.

### *August 13*

Alexandria Harmonizers Concert. Free. Market Square. 7:30 pm. 703/838-4844, 703/883-4686.

### *August 14*

Irish Festival. Music, dancing, vendors and food. Free. Waterfront Park. Noon-6:00 pm. 703/838-4844.

### *August 21*

Victorian Tea. 19<sup>th</sup>-century parlor games and tea for young ladies and their dolls. \$20. The Lyceum. 2:00 pm. 703/838-4994.

### *August 21*

American Indian Festival. Music, dancing, vendors and food. Free admission. Market Square. Noon-6:00 pm. 703/838-4844, 703/883-4686.

### *August 21*

Library Card Protest Commemorative. On August 21, 1939, five young African-American men from Alexandria staged a peaceful protest for library cards in the city's Queen Street (Barrett) Library. Honor the courage of these young men on the 60<sup>th</sup> anniversary of this protest which led the City to build the Robert Robinson Library for African-American citizens in 1940. Alexandria Black History Resource Center. 2:00 pm. 703/838-4356.

### *August 24*

#### *through September 19*

"WIRED" exhibit. Potomac Craftsmen Gallery, Torpedo Factory Art Center. 703/548-0935.

### *August 29*

#### *through September 25*

"250 Years of Alexandria Faces: Historic and Contemporary Portraits." Free. The Athenaeum, 201 Prince Street. Wed-Fri, 11:00 am-3:00 pm; Sat, 1:00 pm-3:00 pm; Sun, 1:00 pm-4:00 pm. 703/548-0035.

# Office of Historic Alexandria

P.O. Box 178, City Hall  
Alexandria, Virginia 22313

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800 – 808 North Washington Street  
BAR #2025-00139-OHAD

Melissa B Kuennen, Vice President  
NOTICe (North Old Town Independent Citizens association)

## Responsibility of the Board of Architectural Review:

A project located on Washington Street is subject to a **higher level of scrutiny and design** to ensure that the **memorial character** of the George Washington Memorial Parkway is protected and maintained **as required in the City's 1929 agreement with the federal government**.

The city's **Old and Historic Alexandria District Zoning Ordinance** is a **legal document** and uses the word **SHALL in every instance** where new construction, even when not adjacent to old or historic structures, must meet very strict design requirements.

The **Staff Report** consistently states that the OHAD **zoning ordinance** and the **Washington Street Standards supersede the OHAD Design Guidelines** since the building is located on Washington Street.

Regardless of approval for the Certificate of Appropriateness in the Staff Report, **it is wholly the responsibility of this Board** to ensure the **OHAD zoning ordinance** and the **Washington Street Standards** are met.

## Conformance to Washington Street Standards:

The **Staff Report** for 16 July 2025 consistently states the **Washington Street Standards** to be met, but then **confusingly** excuses the applicant's nonconformance in their review of each item. For example:

1. (Pg 6) **Staff:** "It should be noted that the proposed multi-family building for this site is being proposed in the context of the **previously approved** and currently under construction multi-unit development immediately to the west of the project site at **805 North Columbus Street**."
  - The previously approved building on N Columbus **DOES meet the OHAD zoning ordinance in terms of massing and scale** because it **steps back at the 3<sup>rd</sup> story**, and the 4<sup>th</sup> and 5<sup>th</sup> stories are significantly set back to honor the character and massing of the houses across the street (**see pg 37 of application**)
    - **Why does Staff or the Board not require this setback on Washington Street?**
2. (Pg 12) **Standard:** Construction **shall be compatible with and similar to** the traditional building character, particularly including mass, scale, design and style, **found on Washington Street** on commercial or residential **buildings of historic architectural merit**.

**Staff:** "The proposed massing does not overwhelm the existing historic townhouse and the proposed massing for the new construction portion of the building is **consistent with the nearby historic fabric**. The Board should note that **this area of North Washington Street has little remaining historic fabric in place beyond the townhouse and the Little Tavern building to the north of the project site**."

  - The staff interpretation of the Washington Street standards wrongly **forgives** this project from having to meet the standards requiring design similar to buildings with **historic architectural merit**:
    - At no time should the zoning ordinance be ignored because the area **"has little remaining historic fabric in place."**

**Staff:** "The breakdown of the massing into components that do not imitate **historic** buildings but reduces the overall impression of the size of the building is **consistent with other large scale buildings** along Washington Street."



- **The staff interpretation of massing requirements wrongly allows the project to be consistent with ANY large building on N Washington St.**
- 3. **Standard:** Building materials characteristic of buildings having **historic** architectural merit within the district **shall be** utilized.  
  
**Staff:** *While the use of metal panels is not typically found in the historic district, their use in this application will help to separate the two more traditional masses in a way which is **not unusual**.*
  - **The use of metal panels as construction material, except for copper bays and roofs, are not found in historic buildings in the OHAD. Staff fails to cite why this material use is not unusual.**
- 4. **Standard:** New or untried approaches to design which result in new buildings or additions to existing buildings that have no historical basis in Alexandria or that are not consistent with an historic style in scale, massing and detailing, **are not appropriate**.
  - **The design uses elements that are not appropriately historic in character – such as creating vertical piers that do not indicate floor levels but instead band multiple floors together to accentuate the additional height.**
  - Since the **additional height granted by the DSUP** is wholly **uncharacteristic** of Washington St. shouldn't it be **downplayed** in the design?

## Summary

A far more creative solution could **very easily** have been provided for this 5 story building that meets the zoning ordinance requirements.

1. The historic house is given a **lower status** by being **overwhelmed** by the scale of the addition.
2. Instead, the new building could have **deferred to the historic building** in many ways:
  - ✓ **Stepping the building back from the front elevation of the historic house** to indicate more separateness
  - ✓ **Stepping back the floors above the cornice of the house**, even slightly, to acknowledge the difference in height
  - ✓ **Changing material color** above the cornice of the house.
  - ✓ **Utilizing natural materials such as stone or another color brick** in lieu of the uncharacteristic metal panel façade.

**Regardless** of how much time and effort the applicant has spent on this project, as indicated their architect **could very easily have designed the building to legally comply** with each ordinance item it **violates** and **should be required to do so**.



---

**FW: [EXTERNAL]Meeting Minutes of June 18th regarding 802-808 N Washington**

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**From** William Conkey <william.conkey@alexandriava.gov>

**Date** Mon 7/14/2025 3:28 PM

**To** Kendra Jacobs <Kendra.Jacobs@alexandriava.gov>; Luke Cowan <luke.cowan@alexandriava.gov>; Ted Alberon <ted.alberon@alexandriava.gov>

 1 attachment (368 KB)

18 Jun BAR - Item 2025-00139-OHAD Comments from NOTICe.pdf;

Please forward the attached email to the Board and attach it to the docket for Wednesday.

Bill Conkey, AIA  
Historic Preservation Architect  
City of Alexandria, Virginia  
Dept of Planning & Zoning  
703.746.3854  
alexandriava.gov



*The City of Alexandria's 275<sup>th</sup> Anniversary*

---

**From:** Melissa B Kuennen <melissa.b.kuennen@gmail.com>

**Sent:** Monday, July 14, 2025 3:11 PM

**To:** William Conkey <william.conkey@alexandriava.gov>

**Cc:** gail rothrock <grothrock@gmail.com>; Dino Drudi <dino.drudi@gmail.com>; Mary C. Harris <mary.celeste.harris@gmail.com>; Marsha Thaler Smith <marshathalersmith@yahoo.com>

**Subject:** [EXTERNAL]Meeting Minutes of June 18th regarding 802-808 N Washington

Bill,

As you know, in lieu of speaking for 5 minutes at the June 18 BAR meeting I was granted the opportunity by the Chair to include a written statement into the meeting minutes. I sent you those comments on June 19th (and are attached to this email).

Unfortunately I see no attachments to the draft minutes accessible online, nor are any other statements by citizens attached. Instead those comments are relegated to short paragraphs describing only one or two issues of concern when our letters and statements covered several areas and in more detail.

In particular, the NOTICe statement included the fact that in the OHAD Zoning Ordinance where the word SHALL is used then that regulation is REQUIRED to be followed.

The Staff Reports always include the statement that since this site is on Washington Street then the Zoning Ordinance and the Washington Street Standards supersede any suggestions made in the Design Guidelines. Yet the Staff comments consistently FORGIVE the applicant for not following these more stringent requirements.

The Washington Street Standards state very clearly:

*Construction shall be compatible with and similar to the traditional building character, particularly including mass, scale, design and style, found on Washington Street on commercial or residential **buildings of historic architectural merit.***

Staff states that this area of Washington Street "has little remaining historic fabric in place" - but that is no reason to ignore the requirements. In fact, that is the whole point of the Washington Street Standards.

In addition, the staff report interpretation of massing requirements wrongly allows the project to be consistent with ANY large building on N Washington St. as stated"

*The breakdown of the massing into components that **do not imitate historic buildings** but reduces the overall impression of the size of the building is **consistent with other large scale buildings** along Washington Street.*

NOTICE wants our concerns stated for the record that we do not approve the BAR give this project a Certificate of Appropriateness due to the applicant's failure to follow the Washington Street Standards, particularly for design that does not meet similar historic building massing, set backs, deferral to the historic house, and use of non-historic materials.

Please forward this email to all members of the Board of Architectural Review.

Thank you,

Melissa  
VP, NOTICE

--

Melissa B Kuennen  
525 Montgomery Street #404  
Alexandria VA 22314  
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571.458.6588

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Board of Architectural Review

18 Jun 2025

800 – 808 North Washington Street

BAR #2025-00139-OHAD

Melissa B Kuennen, NOTICe Vice President

The members of the **Board of Architectural Review** are the **gatekeepers** for the appropriateness of design of buildings that are proposed in the **Old and Historic Alexandria District**.

**As stated by staff:** *A project located on Washington Street is subject to a **higher level of scrutiny and design** to ensure that the **memorial character** of the George Washington Memorial Parkway is protected and maintained **as required** in the City's 1929 agreement with the federal government.*

**It could not be more clear.**

As an architect I have read enough contracts to know that if the word **SHALL** is used then whatever it is referring to is **REQUIRED**.

The **City of Alexandria Zoning Ordinance for the Old and Historic District** is a **legal document** and uses the word **SHALL** in every instance where new construction, even when not adjacent to old or historic structures, must meet very strict design requirements.

The **OHAD Guidelines** make suggestions and further define **information** within the zoning ordinance. This project is located in the area of **Pendleton Street to Bashford Lane** and has additional guidelines to follow for pedestrian scale. **But these guidelines do not supersede zoning language.**

**The massing, scale and design used on his project is not appropriate for the Old and Historic Alexandria District.**

I will not reiterate word for word the **zoning ordinance requirements** that are being **violated** because they were written so clearly in the letters from the **Historic Alexandria Foundation**, dated **May 15** and **June 3**, which give you the **exact zoning language** this project is **required** to follow.

**For Example:**

- New buildings and additions to existing buildings **SHALL NOT**, by their **style, size**, location or other characteristics, **deduct from, overwhelm**, or otherwise intrude upon **historic buildings** which are found on the street.
- **New buildings and additions to existing buildings which are larger than historic buildings** which are found on the street **SHALL NOT** give the impression of collectively being **more massive** than such historic buildings.



EAST (N. WASHINGTON STREET) ELEVATION

- The building **overwhelms** the existing historic residence in scale, height and level of detail.
- **Why save the house** if you aren't going to recognize and **honor** its scale and level of detail?

- This design **SHALL BE** accomplished through **differing historic architectural designs, facades, setbacks, roof lines and styles**.

- The contemporary design of the five-story building **does not utilize** any **historic elements** of ornamentation or detail, nor does it **reflect** **historic building proportions** that are shown in the **Precedents** used by the applicant.

- **Building materials** characteristic of buildings having historic architectural merit within the district **SHALL BE** utilized.



- The use of **grey brick** is not historic nor is it found within the district
- Even if the grey brick is replaced with **red brick**, the use of **metal panels**, except for copper bays and roofs, are not found in historic buildings in the OHAD.

- Construction **SHALL** display a **level of ornamentation, detail and use of quality materials** consistent with buildings having **historic architectural merit** found within the district.

➤ Where is any of the ornamentation found in the historic buildings used as **Precedents**?

- **New or untried approaches to design** which result in new buildings or additions to existing buildings that have **no historical basis** in Alexandria or that **are not consistent with an historic style** in scale, massing and detailing, **are not appropriate**.

- The design uses elements that are **not appropriately historic in character** – such as creating **vertical piers** that do not indicate floor levels but instead **band multiple floors together to accentuate the additional height**. *Since this additional height granted by the DSUP is wholly uncharacteristic of Washington St. shouldn't it be downplayed?*
- The windows are **larger than historic windows sizes**, and **all the same size**, from street to roof, which contradicts **historic precedent**.
- The **link between the historic residence and the new building** is still very **awkward** and highlights the **misalignment of floor levels**, it should be more neutral in scale. The balconies just emphasize this issue.

This is not an addition nor a replacement for the Town Motel, **this is a new building and is to incorporate the historic scale, detail and proportions of the historic house the applicant has chosen to save and attach**.



Your **Precedents** of historic buildings on **Washington Street** could have been better **emulated**. It is not clear that any of these features were used, save the addition of thin bands applied to the façade. All of these historic design elements could have been used successfully.

- The **Cotton Factory** has very obviously **colonial-scale windows** with a **monolithic brick façade** with **sloping roof and dormers**
- The **Federal Courthouse** and the **George Mason Hotel** are clearly **classical revival** in style and reflect a **very strong base / middle / capital articulation, with very clear indication of floor levels**. Windows are uniform in size and given greater articulation based on where they are located.

**A far more creative solution could very easily have been provided** for this 5 story building that **meets the zoning ordinance requirements** and reflects more closely the previous BAR approval in 2017.

The historic house is given a **lower status** by being **overwhelmed** by the scale of the addition.

Instead, the new building **could have deferred to the historic building** in many ways:

- ✓ **Stepping the building back from the front elevation of the historic house** to indicate more separateness
- ✓ **Stepping the floors above the height of the house back**, even slightly, to acknowledge the difference in height
- ✓ **Emulating the window sizes** with head and sill detail
- ✓ **Changing material color** above the height of the house.

Although city staff have approved this submission, they do not have the **ultimate responsibility** this Board has to **ensure the legal zoning ordinance requirements** are followed that **protect** historic Washington Street.

Regardless of how much time and effort the applicant has spent on this project, as indicated their architect **could very easily have designed the building to legally comply** with each ordinance item it **violates** and **should be given the chance to do so**.

We ask you **to reject** this submission for Certificate of Appropriateness for 800-808 North Washington St.