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January 4, 2022

Mr. James Spencer and Members
Alexandria Board of Architectural Review
Alexandria City Hall
301 King Street
Alexandria, Virginia 22314

By email

Re: Docket #5 & 6, BAR #2021-00654 & 2021-00655, Old and Historic Alexandria District, January 5, 2022

Dear Chairman Spencer and BAR members:

We are writing to you to request a deferral and restudy of the request for demolition and a certificate of appropriateness for the proposed project at 322 S. Lee Street. As set forth in detail below, we do not believe that the public has been provided with sufficient information to evaluate and comment on the proposed project and are concerned that the current COVID emergency has and continues to hamper the normal processes of review of the construction approval applications before the Board.

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 Old and Historic District, 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.

HAF is both an owner of real estate in the Old and Historic District of Alexandria (410 South Washington Street), and the holder of preservation easements on numerous properties in close proximity to the property under review. These include 210 Duke Street (Craik House), 418 S. Lee Street (Roberdeau House), and 207 Prince Street among others. We provide tens of thousands of dollars each year to support worthy and important restoration work on historic properties in the Old and Historic District and elsewhere in

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the City. Moreover, our membership includes property owners throughout the City of Alexandria including those in close proximity to the proposed project.

The project under review is located in the heart of Old and Historic District. The Old and Historic District, the third oldest historic district in the United States, is a Landmark of statewide and national importance that is listed on both the Virginia Landmarks Register and the National Register of Historic Places. It is therefore important that you give due consideration to the Landmark status of the District and the effect this project will have upon the District when evaluating the proposal. Va. Code § 10.1-2204(B); Alex. Zon. Ord. § 10-101(A).

We note that the house located at 322 S. Lee Street is a prominent feature of the 300 Block of South Lee Street and an important contributing resource to the Landmark Historic District. Its main block has intact and outstanding Italianate features which should have been described in the Staff Report to provide the BAR and the public an adequate appreciation of its importance. The side gardens and picket fence on the property are a character-defining feature of the east side of the 300 block. The House received a Historic Alexandria Foundation Plaque 14-W-322 in 1973.

I. Incorrect Summary of Applicable Standards of Review

In light of the obvious historical significance of the structures at 322 S. Lee Street, we believe that the staff report has incorrectly analyzed the criteria in Alex. Zon. Ord. § 10-105(B). Specifically, on page 3 of its analysis, the Staff Report answers “No” to all three of the following questions posed by the Ordinance.

(1) Is the building or structure of such architectural or historical interest that its moving, removing, capsulating or razing would be to the detriment of the public interest?

(3) Is the building or structure of such old and unusual or uncommon design, texture and material that it could not be reproduced or be reproduced only with great difficulty?

(5) Would retention of the building or structure help preserve and protect an historic place or area of historic interest in the city?

Alex. Zon. Ord § 10-105(B)(1), (3), (5). Given the established history of the building recited above, we believe that the correct answer to these questions can only be “Yes.” Indeed, the correct answer is not even fairly debatable. One can only add, in connection with Section 10-105(B)(3) that antique construction and materials are by definition irreplaceable, and no amount of replication can adequately replace genuine historic fabric. Once demolished the actual historical object is lost forever. By suggesting to the BAR that none of these considerations in the Ordinance apply, the BAR is being asked to apply an incorrect standard in reviewing the proposed demolition application.

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The Staff Report in this case is in marked contrast with the very thoughtful manner in which the standards were significantly analyzed and addressed in the recent BAR case on the December 15, 2021 docket: BAR 2021-00614 and 00615 concerning 111 S. Alfred Street. We believe that the same rigorous findings concerning the removing of the siding at a much more modest house (though also of historical importance) should be applied here.

The matter should therefore be deferred so that a correct analysis properly applying the criteria of Section 10-105(B) can be prepared.

II. Unanswered Questions.

Unfortunately, both the Application and the Staff report leave many basic questions about the proposed project unanswered:

1) There is no indication or discussion of exactly what is being demolished. The Staff Report states: "The applicant proposes limited amount of demolition/capsulation to the wall surface on later portions of the building." However, there is no discussion of what this "limited amount" or what the "later portion of the building" is, since the staff hasn't indicated when the later portion was built.

2) The Staff Report states: "The materials to be demolished are not of unusual or uncommon design and could be reproduced easily." But there is nothing in the report to show where these materials are.

3) Although apparently a small portion of the current siding and underlying Bricktex siding has been removed to show what appears to be German lap siding on the side of the house, there is nothing more in the Staff Report to indicate the overall condition of that siding elsewhere on the main section of the house or the ell.

4) The Staff Report has failed to indicate what, if anything, will be done to restore the original 19th century siding.

5) The Staff Report does not identify the condition and date of the materials to be demolished. While the staff report cites Ethelyn Cox's *Historic Alexandria Street by Street* in the report, stating the house was built by 1853, the Sanborn maps do not show a house there until the 1890's. This should be clarified, as to this unexplained difference in the age of the house is significant.

III. Additional Concerns

1) On page 6 the Staff Report states: "The expanded porch which is located on a later ell is appropriate to the historical style of the structure and does not hide, obscure, or cause the removal of important historic architectural details." Assuming this

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statement covers the ell which is a component of the historic house, this cannot in fact be true. The proposed porch, which is much larger in size, clearly covers more of the historic structure of the ell.

2) There is nothing in the report which analyzes which windows in ell are original to the house or were added later.

3) There is nothing in the report which answers the question as to why the windows need to be replaced or reconfigured. The application suggests in several instances that such changes are necessary in order to reconfigure the interior. However, that is not a suitable reason to destroy the protected historic exterior fabric of this house.

4) If the purpose of the reconfiguration of the windows are to align it with the porch, the question previously raised here applies—why does the historic fabric of the house have to be demolished to accomplish that goal, and how much will be destroyed?

5) The drawing on #27 shows the following:

- Removal of 2nd floor windows, trim, shutters and portions of a wall along the middle south elevation.
- Removal of 1st floor windows, doors, trim, paneling and portions of wall along middle south elevation

Again, the Staff Report has not addressed whether there is historic fabric here and whether it can be repaired. There is no analysis at all as to the age of each of the windows. The 1960 Russell Jones photograph in the Cox collection at the Alexandria Public Library (Attached) shows that 6/6 windows are on the 2nd floor of the ell. Therefore, there is a strong likelihood that some of the windows and certainly their placement is historic.

6) A patch of siding has been removed on the south side of the ell showing the bricktex siding that was on the house in the Russell Jones photo, and (viewing from the street) it appears that original siding is under the Bricktex. We believe that it is imperative that more attention be given to this detail. Staff should be in a position to work on the restoration of the original siding if at all possible. Unfortunately, the Staff Report does not discuss this siding issue.

7) The applicant states that new lanterns are proposed for the south wall at the open porch. There is nothing in the staff report commenting on whether the proposed lanterns are appropriate or not. That in turn may not be answerable until the exact age of the house is determined.

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8) The application refers to a new brick chimney. However, there is nothing in the staff report commenting on the appropriateness of the dimensions or height of the chimney, or the color of the brick, or even the necessity of this action.

For all of these reasons, we respectfully we submit that there are so many unanswered questions that this case needs to be deferred.

Thank you for your consideration of our statement.

Respectfully submitted,

Historic Alexandria Foundation
By:

/s/ Gail Rothrock
/s/ John Thorpe Richards, Jr.

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COX COLLECTION

Area Survey
320, 322 S. Lee Street
Alexandria, Virginia



Russell Jones, Photographer

April 1960

West (Street) Elevation, 320 L