



NRCA, P.O. Box 3242, Alexandria, VA 22302

February 24, 2021

Karl Moritz, Director
Office of Planning and Zoning
City of Alexandria, Virginia

Subject: Proposed Subdivision #2020-00009 at 506 North Overlook Drive

Dear Mr. Moritz:

The North Ridge Citizens' Association (NRCA) has been looking into the history of the property at 506 North Overlook Drive and the proposal to resubdivide the lots. For the reasons provided below, we believe Planning and Zoning should reconsider its conclusion that historical oversight is not needed and its recommendation that the Planning Commission approve the subdivision.

The property at 506 North Overlook Drive has historical significance

The historical record of 506 North Overlook should be fully investigated before the property is disturbed. The existing house, known in the North Ridge community as “The Civil War House,” has long been celebrated as a unique and important symbol of the neighborhood’s history. It has been featured as a historic property on the NRCA website for many years. It is also featured in both the 1981 and 2000 editions of “North Ridge Lore,” a publication documenting the history and the best-known narratives about our neighborhood.

Your report states that, “No archaeological oversight will be necessary for this subdivision.” We challenge that interpretation. While there are conflicting records as to the precise date this house was built—property records say 1850, others say 1840, 1878 and 1894—the owner and his family are listed in our neighborhood in the U.S. Census of 1870 and 1880. Thus, the house appears to be well over 100 years old. Moreover, the property is listed in the 1992 Small Area Plan for Historic Preservation in North Ridge as the first of 37 properties designated as being a “Documented Historic Site.” This designation alone should trigger further investigation into the history of the house.

The 1992 document shows 506 N. Overlook Drive (1878) under the name of H. Fractious estate (1894). That refers to Hampshire Fractious, a free African-American man who owned this and other properties in Alexandria shortly after the Civil War and who appears to have been one the highest African-American taxpayers in the City. In an appendix to this letter, we offer a host of supporting documentation that should invoke further research and evaluation by the City’s historic preservation experts.

As the 1992 Small Area Plan for Historic Preservation states, *“The unique identity of any locality derives from its geographical setting, its early development pattern, its familiar architecture and settings and its people, all*

of which combine to provide a city with its special sense of place. The preservation and conservation of early buildings, streetscapes, vistas, landscapes and neighborhoods serves to maintain and enhance the unique character of a city....” We fear that, project by project, the unique character of Alexandria is being lost.

This is not just a subdivision request.

The applicant asserts that this request is solely to re-subdivide two existing lots into two lots of more equal size, proposed as Lots 500 and 501. According to the application, “The demolition of the existing dwelling is not the subject of this subdivision request.” Yet, at the same time, the applicant acknowledges his intent “to demolish the existing dwelling and construct a single-family dwelling on each new lot.”

The proposed subdivision is inconsistent with the requirements of Section 11-411 of the zoning code pertaining to Historic and Archaeological Preservation which provides that “A preliminary site plan which includes land designated as a potential resource area on the City of Alexandria Archaeological Resource Map must require, as part of preliminary site plan, reasonable archaeological evaluation reports and resource management plans.” This section applies to all applications for preliminary or combined site plan or other development approval (emphasis added) subject to 11-411.

If the City allows the subdivision and demolition, any required evaluation reports and resource management plans that are part of a site plan will be too late to save this historic structure. At a minimum, the proposed demolition is a “ground-disturbing activity” that qualifies for an archaeological evaluation report prior to any action by the owner/applicant.

In addition, we respectfully disagree with conclusions in the Lot Analysis (Staff Report pp. 9-10). First, the Lot Analysis incorrectly states the requirements of Section 11-1710(B). While the Analysis states that that Section requires that subdivided lots “shall be of substantially the same character as to suitability for residential use and structures, lot areas, orientation, street frontage, alignment to streets and restrictions as other land in the subdivision, particularly with respect to similarly situated lots within the adjoining portions of the original subdivision,” that is only part of the relevant test. The critical omitted language requires more—it requires that “No lot shall be resubdivided in such a manner as to detract from the value of adjacent property.” The Lot Analysis fails to address this requirement; as a result, the Staff Report and recommendations therein are fatally flawed.

The Lot Analysis ignores the fact the subject property and the existing historical structure thereon are a significant part of the existing character of neighboring properties. The planned subdivision and demolition would change the character of the neighborhood permanently. Section 11-1710 (C) requires that “The plat shall conform as near as possible to the master plan and its amendments, a copy of which is on file in the office of the director.” We refer you again to the 1992 Master Plan for Historic Preservation which lists this property as a Documented Historic Site.

Finally, we note that the topography, including the step gradient downhill towards the adjoining preschool property, are not addressed in the Staff Report. These and other safety concerns need to be evaluated under Section 11-1710(B) as part of the “suitability for residential use,” and under Section 11-1708(A)(2), which requires that “The subdivision will not adversely affect the public health, safety and welfare.”

The tree canopy is also significant

In addition to the historic significance of the property to North Ridge, we would reinforce the points in your report about the importance of these lots to the tree canopy of North Ridge. The loss of mature trees on this

property due to demolition and construction would be measurable. Just as approval of the subdivision would be a death knell for the historic house, it also would largely destroy the trees since two houses would be constructed on the property leaving little likelihood of saving them. This request should be reviewed by the City Arborist.

Petition from the adjacent neighbors

One hundred and four (104) neighbors on the streets surrounding 506 N. Overlook Drive have signed a petition to the Planning Commission requesting deferral of the subdivision request and asking for further research and evaluation on the history of this property and its significance to Alexandria's heritage before the house or property is disturbed. That petition is submitted as an attachment to this letter.

Requested actions

For the reasons cited above, which are supported by the factual evidence presented in the appendix to this letter, we request the following actions:

- The Office of Planning and Zoning should modify the staff report to recognize the unique historical attributes of this house and recommend a full historical and archeological assessment of the property, as well as a review by the City Arborist;
- The applicant should be required to enter into discussions with the Office of Historic Alexandria to arrange for the appropriate evaluation reports and resource management plans;
- The Planning Commission should defer any action on the applicant's request, including subdivision, until the historical significance of this property has been properly assessed and the community is afforded an opportunity to explore more appropriate uses for this important part of Alexandria's heritage.

Sincerely,



Chuck Kent
President, NRCA

Cc: Alexandria Planning Commission
Mayor Justin Wilson
Vice Mayor Elizabeth Bennett-Parker
Councilman John Chapman
Garrett Fesler, City Archeologist
Gretchen Bulova, Office of Historic Alexandria
Ann Horowitz, Office of Planning and Zoning
Sam Shelby, Office of Planning and Zoning
Zachary Williams, Attorney

Appendix