

City of Alexandria, Virginia

MEMORANDUM

DATE: NOVEMBER 2, 2007

TO: THE HONORABLE MAYOR AND MEMBERS OF CITY COUNCIL,

THROUGH: JAMES HARTMANN, CITY MANAGER

FROM: FAROLL HAMER, DIRECTOR, PLANNING AND ZONING

SUBJECT: PARKER- GRAY NATIONAL REGISTER DISTRICT NOMINATION

ISSUE: Status of process to obtain a National Register of Historic Places listing for the Parker-Gray Historic District.

RECOMMENDATION: That City Council receive this report.

BACKGROUND:

At Council's direction, and consistent with the community's interest, the Department of Planning and Zoning (P&Z) began the complex task of nominating the Parker-Gray neighborhood to the National Register of Historic Places approximately one year ago. The National Register is the United States' official list of historic buildings, structures, sites, objects and districts worthy of preservation. The National Register is maintained nationally by the U.S. Department of Interior, and within it, the National Park Service. In Virginia, the Virginia Department of Historic Resources nominates eligible properties in the state to the National Register.

Planning staff has been working with John Milner & Associates, a firm with experience in cultural resources and in the nomination process. Planning Staff and its consultants have been meeting and conferring with VDHR representatives since December 2006, and will continue to do so regarding documentation and research, boundary questions, and any other issues that arise in the nomination process, so as to avoid any surprises. This memorandum describes the current status of that process, and identifies issues that have arisen during the progress of the work.

Significance of Listing an area on the National Register

A National Register listing for the Parker-Gray area will confer national recognition for the historic resources found within the district. National Register recognition does not protect an historic building from private actions to alter or demolish it. Only local laws, such as the City currently includes in the zoning ordinance for the locally designated Parker-Gray Historic District, can protect an historic resource.

National Register listing status also provides the potential for federal and/or state tax credits for improvement to private property in the district.

- *Federal tax program.* The federal tax credit program is only applicable to income producing properties (commercial or residential rentals). To be eligible for the tax credit of 20% of eligible costs, the project must be a “substantial rehabilitation,” which means that the improvement or rehabilitation work is so great that it exceeds the owner’s adjusted base value on the building. (Adjusted basis is the value of the property (land and buildings) minus the value of the land, minus any depreciation already claimed). Any costs related to an addition or enlargement of the historic building are not eligible. For example, if a home for rent on North Alfred Street is appraised at \$500,000, with the building valued at \$250,000 and the land at \$250,000, then, assuming that no depreciation has been taken, the cost of the improvement/rehab work must exceed \$250,000 for the work to be eligible for tax credits.
- *State tax program.* In the Virginia tax credit program, which provides a credit of 25% of eligible costs for owner-occupied residential, as well as income-producing properties, the threshold for the state tax credit program is lower than the federal program. For Virginia tax credits, rehabilitation costs for owner-occupied structures must amount to at least 25% of the assessed value of the building. For income producing properties, rehabilitation costs must be at least 50% of the assessed value of the building. As with the federal program, additions and enlargements are not eligible. In the North Alfred Street example above, to be eligible for tax credits, the improvement work would have to exceed \$75,000 for an owner occupied residence and would have to exceed \$150,000 for an income producing property.

Overall Timing of Nomination Process

Although the National Register nomination process is taking longer than originally anticipated, it is progressing – especially given the issues with documentation, boundary issues, and state and federal processing requirements discussed below – in an orderly and professional manner. Based on information from the City’s consultants and VDHR, it is typical for the process to take between 18 and 24 months. If the final nomination is awarded in the summer or fall of 2008, as anticipated, the Alexandria experience will be consistent with the typical case.

Schedule for the Nomination Process

- **Research and Documentation.** This portion of the process was begun in October 2006 and consists of two parts. The first phase requires documenting the physical development of the neighborhood and its social history. Initial research efforts were more difficult than anticipated because there is so little published written material documenting the developmental history of the neighborhood. Original research, including from primary sources, such as newspapers, city directories and written narratives from the Black History Museum, has had to be conducted. This phase of research is complete.

In addition, the nomination application requires that each of the 1600 buildings and structures in the neighborhood be surveyed and photographed and that the information be recorded on a 5-10 page form for each and every building; the data must then be entered into a specific computer database. Attached is the survey information for 410 North Alfred Street as an example. This phase of extensive and painstaking documentation work is 90% complete.

- **Compliance with National Park Service Criteria.** Prior to being submitted by VDHR to NPS, the nomination application must be approved by the Virginia National Register Review Board (VNRR) as meeting established criteria for listing on the National Register of Historic Places. The work to compile the narrative content of the application is being done now and, as confirmed preliminarily by VDHR staff and based on the documentation and research already compiled, Parker-Gray appears to successfully meet NPS criteria based chiefly on its association with African-American history in Alexandria and its intact, historic buildings representing architecture from the late 19th-century through the 1950s. Staff anticipates submitting the Parker-Gray National Register nomination to VDHR by February 2008.
- **Public Meetings.** Staff intends to hold a public community meeting in January 2008, prior to its submission of the formal nomination to the Virginia National Register Review Board, to discuss the content and boundaries of the nomination application. That Board will follow its own process which includes a community meeting here in Alexandria, likely in May 2008. Assuming this schedule can be met, then the Parker-Gray nomination could be heard by the state board at its June 2008 meeting in Richmond.
- **Formal Nomination Review.** After approval by the VNRR Board, VHDR will file the nomination with the National Park Service, which typically evaluates the proposal and responds with comments within 30 days. The hope is that the City will have an affirmative answer regarding the new National Register listing by the summer or fall 2008.
- **Outreach and Coordination with other Plans** The City met with the Inner City, Upper King Street and Old Town Civic Associations last winter, and has prepared and distributed handout information regarding the National Register of Historic

Places, the difference between a locally designated historic district and a National Register Historic District, the process for achieving a listing on the National Register, and the rules for tax credit eligibility. See attached handout material.

Planning staff has been coordinating its efforts with regard to the National Register nomination with other planning efforts related to the Parker-Gray area, including the Braddock Road Plan and Braddock East. The interrelation of the various planning efforts and their boundaries, as shown on the attached maps, were discussed at the Braddock Metro Neighborhood Plan meeting on October 16, 2007.

Although the Parker-Gray Board of Architectural Review does not have an official role in the National Register process, City staff will bring the Parker-Gray National Register of Historic Places nomination to it and to City Council for support as an action item. The City is serving as the applicant for the nomination.

CONCLUSION

The Department of Planning and Zoning is working diligently to nominate the Parker-Gray historic area to the National Register of Historic Places. While the state and federal process for the National Register is time consuming, staff anticipates a favorable decision on the nomination, resulting in the listing of the Parker-Gray neighborhood on the National Register of Historic Places.

STAFF: Faroll Hamer, Director, Planning and Zoning
Stephen Milone, Chief, Land Use Services
Lee Webb, Supervisory Urban Planner
Beth Hannold, Urban Planner III

cc: Chairman and Members of the Planning Commission
Chairman and Members of the Parker-Gray Architectural Review Board

ATTACHMENTS: 1. Sample Department of Historic Reconnaissance Level Survey
2. Informational handout material
3. Map showing boundaries of local historic districts and Braddock Neighborhood Metro planning areas