



July 9, 2026

Kelly Pennick, Chair, and members of the Architectural Review Board
Kate Schwartz, Planning & Historic Resources Division Manager

RE: Architectural Documentation Prior to Demolition of Historic Buildings

Dear leaders of Fredericksburg's Historic Preservation program:

Historic Fredericksburg Foundation, Inc. (HFFI), submits this proposal for your consideration regarding the creation of a standard policy for the documentation of historic resources under threat of demolition or substantial alterations in the City. This work is in keeping with the powers and duties assigned to the Architectural Review Board (ARB) by Section 10-52 of the City Code.

The goal is to establish a standard process, expectations, and responsibilities for the consistent recordation of threatened historic assets. This documentation should include historic buildings, sites, and landscapes that are eligible for or listed on national, state, or local historic resource inventory.

HFFI researched other localities' historic commissions' responses and produced a spreadsheet with information gleaned from 40 Virginia cities and counties. While specific requirements vary, comparable localities such as Alexandria, Charlottesville, Warrenton, Leesburg, and Virginia Beach prescribe Historic American Building Survey (HABS)-level documentation with measured drawings for threatened resources—sometimes as a prerequisite for consideration of a Certificate of Appropriateness (COA).

ARB members may recall that the COA approved on June 13, 2022, for the demolition of the contributing historic resource at 204 Lewis Street was conditioned on the submission of a HABS Level-III documentation report. In March 2026, HFFI requested a copy of any such documentation. To our knowledge the required HABS-III report has not been submitted in the 4 years since this COA was approved.

Making a record of “as-is” or “as-built” conditions provides more accurate information to ARB members and enlightens the owner about the property's structural and architectural integrity. Such documentation could encourage preservation and reuse because the repair of an existing building is typically less expensive than its demolition plus the cost of new construction.

As the leaders of City's Historic Preservation program, the ARB is ultimately responsible for making the demolition of historic assets a last resort. Establishing a clear pre-demolition documentation policy will ensure a more complete record of our historic landscape.

Thank you for considering this proposal and reviewing the attached research materials compiled by HFFI's Preservationist, Danae Peckler.

Table 1: Recent City Documents Supporting Recordation and Demolition Prevention.

Fredericksburg Historic District Design Guidelines (adopted by City Council June 2021)	p. 122, 3rd paragraph: “Thorough documentation will be required of any building to be demolished; long term neglect is not considered an adequate reason to demolish an existing building.”	p. 125, Unsafe Structures, seventh bullet: “Thorough documentation of a structure, meeting standards set by the ARB, shall be allowed prior to any demolition.”
City Code Chapter 72-23.1: Historic District-certificates of appropriateness [Amended 5-23-2017 by Ord. 17-13; 6-11-2019 by Ord. 19-241]	B. Process: review by the ARB. (2) An applicant for a COA shall submit to the ARB materials sufficient for it to render a decision on the criteria herein set forth. The ARB staff is authorized to reject any application that does not include information, at a minimum, to permit the ARB to evaluate the application with respect to the foregoing factors. The ARB may require additional submissions from the applicant if necessary.... (4) Submittal requirements are contained in the UDO Procedural Manual.	
City of Fredericksburg: Unified Development Ordinance Procedures Manual (updated and adopted December 2025)	p. 34: “There are specific criteria in Sec. 72-23.1 for applications that deal with alteration of existing structures, construction of new structures, demolition or relocation of structures, and signs. Additional guidelines are provided in the Historic District Design Guidelines.”	p. 35: Submittal Requirements separate what is expected for “New construction, addition, exterior alterations, and accessory structures” from “Demolition,” under E. 1. Documentation of structural condition; 2. Documentation of inordinate hardship (if applicable); 3. Plans for property once demolition is accomplished.
[No longer applicable] Ordinance 06-32 – Amending certain provisions of City Code Chapter 78 (adopted by City Council December 12, 2006)	Amended as follows: 78-756: Application for certificate of appropriateness, (b) The ARB per the community development coordinator may request any or all of the following information in order for the application to be deemed complete: (3) Photographs, maps, and drawings related to the proposed use to surrounding properties; axonometric or perspective drawings, and/or model illustrating in three dimensions the proposed project in context with surrounding buildings.	
Historic Preservation Working Group (20+ local preservation stakeholder representatives) to inform Historic District Handbook revision (April–Sept meeting minutes, 2018)	pp. 4–5: “Preventing demolition by neglect and documenting resources that will be lost to demolition” identified as an important issue.	p. 5: Potential changes: “Establish requirement that full documentation (HABS-level) of the building be completed before removal takes place.”
City of Fredericksburg, Historic Preservation Recommendations: Economic Incentives and Spot Blight/ Demolition by Neglect (Heritage Arts, 2023)	p. 5: “There is a great deal of community concern regarding numerous historic properties showing signs of deterioration from a lack of maintenance. During the past 15–20 years, several significant historic structures have been lost to demolition for a variety of reasons.”	p. 16: “If a property is deteriorated or at risk, the goal of an effective preservation program is to keep the building standing until personal circumstance, economic conditions, and/or suitable uses present themselves for the building to earn its own way.”

Critical factors for documenting historic properties prior to demolition:

- 1) Cultural historic value of the resource, extent and timing of its documentation;
- 2) Quality of documentation and accuracy of information therein;
- 3) Responsible parties for preparing, reviewing, and disseminating final materials;
- 4) Applicability, usability, and access to such documentation.

Frequently Asked Questions:

Why document historic resources threatened by demolition or significant alteration?

The goal of any documentation of our built environment is to create a record that provides architects, engineers, scholars, preservationists, and interested members of the public with accurate and wide-ranging information on the historical, architectural, technological, and/or cultural significance of a historic building, site, structure, or landscape.

Taking a snapshot in time of a given historic property by thoroughly documenting its physical fabric helps prevent its permanent loss from our community's collective memory. Storing this information in publicly accessible repositories preserves the record of a property's existence and the many stories it has to tell.

What information is important to record about historic resources?

The data captured for historic buildings, sites, structures, and objects can be physically documented through photographs, drawings, and written descriptions. The extent to which these tools and methods of data collection are employed has a tremendous impact on a resource's ability to convey the historical, architectural, technological, and/or cultural significance it embodies.

Although a property's ownership, occupation, and use can be thoroughly researched after it is demolished, its built history cannot. The architectural details of a building and landscape embody and reflect conscious and unconscious decisions pertaining to its design, evolution, materials, and the workmanship of those individuals who shaped it over time.

We need only to think about some of the places that have disappeared from Fredericksburg's cityscape (e.g., the Opera House, French Memorial Chapel, Potter's Field cemetery) to be reminded that regret goes one way.

What standards are set for documenting historic resources in the field of Historic Preservation?

Although anyone can take photographs and make a sketch of a place, uniform national standards for the documentation of historic properties are defined by the Secretary of the Interior's (SOI) *Standards and Guidelines for Architectural and Engineering Documentatio*, and provide the foundation for the technical requirements outlined in the Historic American Buildings Survey

(HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) documentation-level guidelines.

Historic commissions, state historic preservation offices, and preservation organizations commonly use HABS standards to generate a consistent level of quality. Professionals capable of recording historic structures consistent with HABS include SOI-qualified architectural historians, archaeologists, architects, engineers, and other design professionals.

Who is responsible for preparing this documentation?

The property owner seeking to remove the historic resource should assume the cost of pre-demolition documentation, rather than the city's taxpayers.

Where should this documentation be stored?

At least one physical and digital copy of the historic resources' documentation should be filed with the locality's Planning Department, historic preservation organizations or institutions, local history center(s), and the state historic preservation office. If prepared properly to meet HABS standards, a copy might be submitted to the Library of Congress to be preserved in perpetuity and made accessible to the widest public audience.