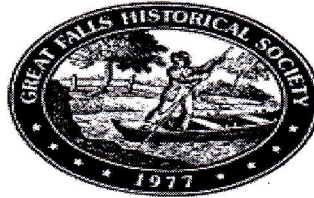


GREAT FALLS
CITIZENS ASSOCIATION



August 6, 2014

Ms. Cindy Walsh
Director, Resource Management Division
Fairfax County Park Authority, Suite 927
12055 Government Center Pkwy.
Fairfax, Virginia 22035-1118

Dear Ms. Walsh:

We are pleased to submit comments to the Fairfax County Park Authority on the *Resident Curator Program Study* draft report by John Milner Associates (June 2014). We established a working group of residents from the Great Falls Citizens Association and the Great Falls Historical Society to develop comments on the study; those detailed comments are in the attached memorandum.

We would like to highlight our strong support for a Fairfax County resident curatorship program that will have as its highest priority the historic preservation and adaptive reuse of local historic buildings now owned by the county. We believe identifying potential curators for high-visibility County properties should be a high priority for the Board of Supervisors and FCPA.

We believe the program outlined in the draft report can be improved significantly, however, as discussed in our attached, detailed memo. Most importantly, we believe the criteria for property selection should be re-evaluated. We suggest the addition of two other ranking criteria for candidate properties: assessments of the consequences of delay in rehabilitation and of the prominence of a structure in the county. Inclusion of these elements in the candidate assessments will ensure that the curatorship program has sustained support in communities throughout the county.

As you know, Great Falls residents strongly support the refurbishment of the historic Turner Farmhouse through this program. Using the criteria already established, the Turner Farmhouse should be acknowledged for its design and for the materials that will be preserved by a resident curatorship. Action to restore this local historical property cannot come soon enough. To that end, we suggest the county initiate a pilot project for the new curator regulations and recommend the Turner Farmhouse be first considered. This would not only lead to a restored historic property, but it would also serve as a test case to demonstrate how the county might most effectively implement its curatorship program.

We would be happy to discuss our attached recommendations in more detail and encourage FCPA to hold a public comment session in September before finalizing this very important new program.

Sincerely,

Eric Knudsen
President
Great Falls Citizens Association

Kathleen Murphy
President
Great Falls Historical Society

M E M O R A N D U M

TO: Cindy Walsh, Fairfax County Park Authority

FROM: Great Falls Citizens Association and Great Falls Historical Society

RE: Comments on Resident Curator Program Study

DATE: August 6, 2014

CC: Supervisor John Foust

A working group of Great Falls residents representing the Great Falls Citizens Association (GFCA) and the Great Falls Historical Society (GFHS) reviewed and discussed Fairfax County's proposed Resident Curator Program Study (RCPS). This memo summarizes our comments on the proposed program as presented in draft form by John Milner Associates, dated June 2014.

We commend Fairfax County for initiating this effort, made possible by enabling legislation enacted by a Commonwealth of Virginia statute in 2011. Great Falls residents are very interested in seeing a Resident Curatorship Program established that will effectively lead to the refurbishment of several County properties in our area which are badly deteriorating and need immediate attention. It is our hope the Fairfax County Resident Curatorship Program will reverse the decline of these properties -- especially the historic Turner Farmhouse, which sits on busy Georgetown Pike.

In the spirit of transparency called for in the RCPS and in the interest of gaining further public support, we encourage the County to hold a public hearing on this program proposal and not leave it just to summertime comments to get it right. FCPA held two very informative sessions a year ago, attended by many people from Great Falls, when the consultants were just getting started. Now that they will report a final plan, a similar public meeting in the fall is in order. Others in communities across the County may have good comments that will strengthen the program, but in most cases, there will be no chance for such beneficial public input with the current timetable. Public support and input is vital to launching and sustaining the program.

At the outset, it is clear a successful program needs to have a flexible framework within which the administrators and program managers are to operate. Selection of the proper curator is a key essential element. The curatorship program, intended to preserve properties of historical significance, should give priority to those whose condition need immediate assistance. Support, interest and involvement of the local community should also be a paramount factor in selecting the initial properties.

Our comments are organized to follow the RCPS structure and suggestions are cross-referenced to the draft report. However, due to the very short time to review the draft report, the comments are not comprehensive on all issues in the draft.

CANDIDATE PROPERTIES (p.65)

We support the threshold of a minimum investment of \$150,000 for properties, but believe in this high-cost, urban area, the costs for rehabilitation may be much higher.

We recommend the addition of two other ranking criteria: (1) consequences of delay and (2) prominence of structures. The current recommended ranking gives a higher priority to properties in average and fair condition. As an example, a stone structure in poor shape may be more durable and stable than a similar wooden-frame structure. The County should consider that failure to find an investor for the frame structure may lead to its demise. There should be more urgency in the program to rescue properties in danger of collapse or further deterioration, such as structures with exposed wood. Similarly, we all stand to benefit from rehabilitation of properties on major roadways, contrasted with those that may be on little-traveled roads. When a property on a major roadway deteriorates, the image of a community as a good place to live and work is undermined. We recommend that these new considerations be included with the other factors.

The assignment of a value of 14 to the Turner Farmhouse raised questions with our working group. The categories of "Design" and "Materials" were not credited for the Turner Farmhouse in the table on page 74. Our working group has reviewed the *Turner Farmhouse Preliminary Historic Structure Report* prepared in 2011 by Shaffer, Wilson, Sarver & Gray PC. The very first sentence in the Executive

Summary of that document states that the “Turner Farmhouse is significant due to its Queen Anne style architecture...” In Deborah Cannan’s *Land Above the Falls*, she describes the exterior of the house: “the large house has a complex, irregular roof form, decorative wooden spindlework and half-timbering, and a unique round spindle opening on the projecting second floor. ...The wooden trim was ordered either from a local mill, or, more likely, from a commercial mill specializing in architectural details.” In addition, the materials still in the house are described in the Shaffer, Wilson report including descriptions of newel posts which are typical for late Victorian houses, interior spindlework that mimics the porch frieze, an original bathtub and mirrored medicine cabinet as well as original clay doorknobs, and doors that “have delicate incised decorative detailing with a single large pane of glass in the upper section of the door.”

We are also familiar with some of the investments the Turner family put into the house in the past decade, including authentic southern cypress siding on the exterior, a new basement, heating system, insulation and roof.

We recommend placing an “x” under both “Design” and “Materials,” thus assigning a value of 16 to the Turner Farmhouse.

Adding our two additional criteria, there is a strong basis for selecting the Turner Farmhouse as the Resident Curatorship Program’s initial test case.

PROCEDURAL MANUAL (p.75)

We concur that Fairfax County should provide dedicated funding for this program, with the major goal of historic preservation of County-owned assets. The RCPS references anticipated “financial benefits associated with the development of a RC program,” but we do not believe that should be a major reason to initiate this program. Rather, the Board of Supervisors (BOS) should commit to a well-constructed historic preservation program as the highest priority for RCPS, not revenue generation or County spending decreases. From our perspective, all other factors besides the competent and enduring preservation of historic assets should be secondary.

Program Administration. (p. 78) We understand the rationale for recommending that the Fairfax County Park Authority (FCPA) be tasked with program administration, since it the owner of most of the buildings that are possible

candidates for curatorships. However we have some reservations about this selection. FCPA is primarily focused on managing outdoor recreational facilities around the county, but has an inconsistent record when it comes to managing historic buildings. On one hand, the local Colvin Run Mill has been restored and is widely respected for the preservation of the mill's operations, but on the other hand, the Great Falls Grange has received little FCPA attention and investment (until this year's ADA-related investments, which cannot be used for other overdue improvements and maintenance to that 1929 structure). If the FCPA is to be chosen as Curatorship Program Administrator, we ask that the BOS ensure the mission of that organization includes a strong historic preservation mandate beyond what it is today.

Given how the County budget works and revenue is generated, it is important that safeguards be put in place to protect funds allocated to the Resident Curatorship Program - a program that depends on the sustained and continuing commitment of the Board of Supervisors to succeed.

The RCPS calls for administration by a program manager, supplemented by a program team. We recommend the management of the curatorship program be kept lean and focused. To that end, many in the working group believe the County should not hire more than a single individual to staff the curatorship program. We believe one essential skill needed for the program manager should be a track record of good communications -- combined with strong analytical skills including knowledge of history, finance, project coordination and historical restoration as so many different groups, both inside and outside of County government will be essential to the success of this program. (p.80) In this regard, we recommend the County review the experience of other states with an eye to picking the type of manager who has shown in those locations how to administer an outreach curator program.

The program team will play a key role in the development of the curatorship program (p. 79). We applaud the recommendation it be composed of more than County employees. In particular, we call for the inclusion of citizens who can apply their local knowledge and historic preservation competence. While the structures now may be owned by the County, the buildings were at one time privately-owned structures with deep roots and connections with residents of their respective local communities. Local engagement of citizens in communities

where properties are located should be a required part of the project team. While citizens are mentioned on page 79, little more is said about citizens on the program team. We suggest the County give thought to how this might be accomplished beyond the limited scope given it by the consultants.

It should be noted that there are many local historical societies throughout the County composed of people knowledgeable about local history, dedicated to preserving local culture, and steeped in historic preservation experiences. These are assets available to the County as a partner in exploring candidate properties, evaluating alternative curatorship concepts, and selecting the optimum resident curator. Drawing from this expertise would be an asset to the project team.

RCPS suggests the County “may decide to complete upgrades that would otherwise cause the property to be prohibitive, such as hazardous material abatement...” (p. 83). Other jurisdictions have decided such things as HAZMAT evaluation and removal by the governing authority might make the property more attractive to possible curator candidates. If the governing authority resolved or at least analyzed the utilities that would serve the property in question, then the property might be more attractive to potential curators who have not undertaken similar restorations.

We agree that more County involvement and responsibility in presenting a baseline property to the public for bid would be important. We see that the County offer to provide essential infrastructural upgrades would be a significant incentive to encourage offers by potential curators. Other curatorships around the country include a commitment to such upgrades. Incentivizing a large pool of potential curators will benefit the County, potentially resulting in higher quality curators being attracted with better project economics.

SELECTION OF CURATORS (p. 94)

We agree that finding the right curators will determine the success of the program. Defining the nature of the “sweat equity” the investor will put into the program will be important and it will be different for different applicants. We believe candidates should not be encouraged or allowed to try to take on tasks under “sweat equity” that are above their skill level or may significantly delay the renovation or diminish the historical integrity of the building.

We recommend the County issue program guidelines that acknowledge that curators may differ, depending on residential, commercial and/or nonprofit use. Fairfax is a rapidly urbanizing County. Many of the curatorships in other states are in rural areas or state parks, far from population centers. The Fairfax County Resident Curatorship may face different challenges as properties may have a broader set of adaptive reuse possibilities in a more urban setting than being simply a residence. We hope that the diversity of projects and curators will come to be a hallmark of the Fairfax County program.

We discussed the characteristics of good curator and found the list on page 94 to be thorough. However, we believe a curator who will hire someone else to handle some of the project requirements is acceptable – and even to be encouraged. An investor who understands federal, state and local historic preservation standards may be a good choice, but the County should not allow a slow restoration because the curator is not a good plumber or electrician or has no renovation experience. It is certainly acceptable for the curator to have a managing contractor to coordinate the restoration. Similarly, financial management is a key trait. Solid financial planning, business acumen, sufficient financial resources and financial controls are crucial. The last thing the County or the community wants is to select a curator who can't meet and manage the financial demands of a property restoration, resulting in an eviction and the start of a whole new curator selection process, and possible damage to the historical integrity of the property.

In reviewing curator candidates (p.95), the program team needs to drill down on these traits, asking for specific examples of how the candidate has managed historic preservation through his/her own skills or how they have managed and financed outside contractors.

If a nonprofit organization is a candidate for curator, the County should consider an alternative set of metrics for determining the financial acceptability, laid out on page 95. A nonprofit organization may have a limited source of annual income, but might be in a position to raise substantial financial resources in a community for a once-in-a-lifetime restoration. The consultants' report does not reflect this option and we urge the County to include guidelines and standards to encourage participation by nonprofits.

WORK PLAN (p. 97)

We encourage a work plan that establishes standards that will result in true historic preservation within the context of flexible, adaptive reuse. The goal of the enabling legislation was preservation and reuse by private entities so as to reduce the cost to the taxpayer. If the Secretary of the Interior requirements imposed are too stringent and costly, a resident curator will not be found; if they are too loosely applied, adequate preservation will not occur.

A major goal should be to refurbish a building with minimal alteration of its unique interior features that show how people lived and worked at the time the building was erected. This can probably only be done on a case-by-case basis, as each work plan is reviewed and approved. For example, a period claw foot bathtub will better represent a house built in the 1920s than a Jacuzzi. Curators may want to add the Jacuzzi, but the administrator should weigh how that will diminish the overall value of the restoration. Yet the door should be open to innovative uses in line with the building's original use. For example, when Dranesville Tavern was restored nearly 40 years ago, there was much talk by local officials and historians that it would become once again a working tavern. This promising development did not materialize, however, because the County staff would not allow a potential tenant to construct a kitchen on the facility, clearly essential for a modern tavern.

What consideration will be given to hiring local contractors? While keeping on budget is an important factor for a curator, this is not a private property, but a community asset. All things being equal, we think curators should be asked to entertain bids from local architects and contractors. If a local firm can do the job for the right price, Fairfax County will benefit if they are selected over out-of-state companies. In cases where the restoration challenges require, the Virginia Department of Historic Resources has a referral list of contractors trained in specific restoration techniques.

LEASING AGREEMENT (p. 99)

We discussed a number of leasing issues that could be important to the outcome of the curatorships. We strongly agree a buyout clause is necessary in case a curator does not perform up to the agreements. We believe that subletting would not advance the purposes of the program or ensure proper safeguards.

The length of the lease for a property should be made on a case-by-case basis and used as another incentive to attract qualified curators. For example, an investor willing to invest a million dollars in a property and is otherwise qualified, may be given a longer lease than someone investing the minimum. Such flexibility may result in the attraction of greater financial resources. The RCPS discussion of the Massachusetts program shows the value of this approach. It seems intuitively obvious that someone should not be given a lifetime lease if they only invest \$150,000 in a property that could lease for \$5,000 in the market, i.e. its fair market value (FMV).

Perhaps the RCPS could adopt a rough formula so money invested would relate to the length of lease offered as offset by the FMV of the possible lease on a structure. As an example, if someone invested \$1,000,000 into a property where the FMV of the lease is \$5,000/mo. then the direct payback is about 17 years. [$\$1\text{m}/\$5,000=200\text{ mo.}/12\text{ mo./yr.}=16.7\text{ yrs.}$]. A 17 year lease is not much of an incentive for a curator because there is time invested and the “cost of money” so perhaps there should be a multiplying factor. In this case, if the multiplier was 1.5 then an initial lease of 25 years [$16.67 \times 1.5 = 24.9\text{ yrs.}$] would be offered. This is “getting down in the weeds” but we believe the FCPA and the curator need to have a deal that is fair for all parties and there should be some logical basis that governs all lease negotiations.

Bonding should be considered, as discussed on p. 59. It shows commitment to the project by a contractor. Fairfax County requires bonds be posted for almost all work done for it or on public property so we think bonding a job to insure completion should at least be considered. We feel a potential curator that can offer a completion bond should be looked on more favorably than one that cannot provide a bond.

The County can also about learn about leasing incentives from North Carolina, where the state has recognized federal tax incentives kick in if a property is leased for 27.5 years. Judicious leveraging of such a leasing incentive could benefit the Fairfax curatorship in some instances.

If there is a shorter lease and it is subject to renewal, we believe a good curator should be given right of first refusal rather than opening another RFP. This is an additional incentive for a curator to meet the ongoing requirements in the lease.

ISSUES TO BE RESOLVED (p. 103)

- Taxes. An incentive for participation in this program will be the absence of property tax payments. We agree with the RCPS that inclusion of such taxes in the curator program would be a deterrent.
- Occupancy permit. As recommended, there should be a requirement that the structure be habitable when it is offered. We understand the County has criteria in place for minimum living or working conditions before anyone is allowed to occupy a structure and we feel these should not be waived in this instance. This way the curator will be encouraged to get the work done in a timely fashion so they can actually move in or utilize the structure in the way they intend in the work plan.
- Lease length. Our recommendations are discussed earlier in this memo.
- Commercial function. We agree with the recommendation and realize that in a few instances, there may need to be a zoning change to allow a commercial function, such as a bed & breakfast establishment. Timely cooperation and treatment by the County will be important.
- Accessible upgrades. Historic property standards should apply so that the property is not compromised. We believe that to restore some structures [like the Turner Farmhouse] and make them ADA compliant so the public can visit two times a year may not be practical. We don't see how one could get wheelchair accessibility to the second floor or basement of these historic buildings without extraordinary cost and destruction of structural aesthetics. ADA-compliance standards for public access a several times a year are cost that could be borne by the County, as one of the incentives mentioned earlier to draw a wider net of curator candidates.
- Marketing. Our working group believes local properties should be marketed by the County in conjunction with local community organizations. Where there is a strong community involvement in the project, there may be a stronger response and a wider pool of curator candidates. The County should not view this as something it is doing for the community; but something it is doing with the community.