



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

July 8, 2020

Mr. Joe Damico, Director
Dept. of General Services (DGS)
1100 Bank Street, 10th Floor
Richmond, VA 23219

Re: Robert E. Lee Monument Removal and Storage
City of Richmond, VA
DHR File No. 2020-3995

Dear Mr. Damico:

The Department of Historic Resources (DHR) is writing in response to the Department of General Service's (DGS) request for review of the above-referenced project. The initial submission was received on July 6, 2020 and a subsequent submission, containing supplemental information, was received today. DGS's request for review was submitted in accordance with the Appropriations Act (Budget Bill Section § 4-4.01(q), 2020 Virginia Acts of Assembly, Chapter 1289).

The work of French academic sculptor Marius-Jean-Antonin Mercié, the Robert E. Lee Monument (Monument; DHR ID #127-0181) was individually listed in the Virginia Landmarks Register (VLR) in 2006 and the National Register of Historic Places (NRHP) in 2007. The Monument is also a contributing resource to the VLR/NRHP-listed Monument Avenue Historic District (DHR ID #127-0174). In addition, this district has been designated a National Historic Landmark, to which the Lee Monument is a contributing resource.

On June 4, 2020, Governor Northam announced plans to remove the Monument. As noted in the press release, Governor Northam is acting under his executive authority and Section § 2.2-2402 of the *Code of Virginia*, which provides the Governor the sole authority to approve the removal of a work of art owned by the Commonwealth upon submission of a plan to do so. The Monument was erected for

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

Eastern Region Office
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and is owned by the Commonwealth of Virginia and is considered a work of art pursuant to Section § 2.2-2401 of the *Code of Virginia*.

DGS's project scope of work, dated July 8, 2020, includes a methodology for removal of the Monument prepared by B.R. Howard Conservation, a qualified conservation consultant. DHR concurs with the recommended two-part approach to ensure the safe and respectful removal of both the bronze equestrian sculpture and pedestal. Informed by a recent on-site inspection of the sculpture and granite base by the conservator, the proposed scope of work is consistent with [DHR Guidance Regarding Confederate Monuments](#) (June 2020) developed to support appropriate removal of monuments in a manner consistent with best preservation and conservation practices.

Due to the technically complex and important nature of this project, DHR recommends that our State Archaeological Conservator, Katherine Ridgway (katherine.ridgway@dhr.virginia.gov), be on-site when the Monument is removed. The pedestal may contain a time capsule and other purposefully-placed materials from the time of the installation; these should be anticipated and carefully sought and their condition evaluated during removal. Response to any unanticipated discoveries should be immediately coordinated with DHR; such consultation could be greatly facilitated by having our conservator on site. If objects are recovered during the removal process, we recommend they be stored in the state repository for archaeological collections at DHR or at the Library of Virginia.

Because the Monument is individually listed in the NRHP and is a contributing resource to the NRHP-listed Monument Avenue Historic District, consultation with the NRHP program at the National Park Service (NPS) is encouraged prior to removal. If the Monument is moved without prior consultation with the NRHP program at the NPS, it will be immediately delisted by the Keeper of the NRHP (Keeper). In order for the Monument to retain continuous individual listing, it should not be relocated until the Keeper has cleared the proposed move (see [36CFR60.14\(b\)](#)). If the Monument is moved from the historic district, it can no longer remain a contributing resource to the VLR/NRHP historic district listing. As the VLR mirrors the NRHP, the Monument would, subsequently, be delisted from the VLR as an individual resource and as a contributing resource to the Monument Avenue Historic District.

Removal of the Monument from its historic location constitutes, by definition, an adverse impact to historic resources. DHR requests digital and printed copies of any photo documentation of the existing conditions and any photos taken during removal, packing, and transport of the Monument. If any components of the Monument have been damaged or are damaged during the removal and transport process, this should also be documented and the information shared with DHR.

As you are aware, DHR recently partnered with Longwood University to laser scan the entire monument using a Leica laser scanner. That data will be used to create a 3D photogrammetric model using Agisoft software. Those files can be made available to DGS or your consultant as needed. 3D photogrammetry has also been conducted of the monument, with and without graffiti, at a lower resolution by the Fairfield Foundation. Those files are available at <https://sketchfab.com/fairfieldfoundation>.

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Any future storage, repurposing, deaccessioning, or acquisition of the Monument by another entity or institution should be coordinated with DHR and be informed by a public process. If the Monument is reinstalled in a new location, VLR/NRHP eligibility could be re-evaluated, at which time the original nomination could serve as the basis for an updated nomination.

Thank you for consulting with DHR as part of your planning for this momentous project. We stand ready to be of assistance and encourage you to contact us regarding any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Julie V. Langan". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Julie V. Langan
Director

Cc: Calder Loth

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