VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF FREDERICKSBURG

E.D. COLE BUILDING, L.L.C.	)	
and	)	
LOCAL HOLDINGS, L.L.C.,	)	
Petitioners,	)	
v.	)	Case No.: CL19-951
	)	
COUNCIL OF THE CITY	)	
OF FREDERICKSBURG,	)	
And	)	
CITY OF FREDERICKSBURG	)	
Defendants.	)	

FILED

DEC 27 2019

FREDERICKSBURG
CIRCUIT COURT

BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

The City Council of the City of Fredericksburg (the "Council"), and the City of Fredericksburg (the "City"),[1] Defendants, by counsel, respectfully submit the following in support of their Motion for Summary Judgment:

STATEMENT OF THE CASE

Petitioners challenge as *ultra vires* the Council's Resolution 19-100, enacted November 12, 2019, "Granting a Certificate of Appropriateness for the Relocation of the Slave Auction Block to the Fredericksburg Area Museum." The Petition was timely filed on December 10, 2019, within the 30 days allowed by § 15.2-2306(A)(3) of the Code of Virginia and § 72-23.1(F)(2) of the Fredericksburg City Code.

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[1] The parties have tendered to the Court an agreed Order adding the City of Fredericksburg as a defendant in this action.

FACTS

The so-called "Slave Auction Block" is currently located at the corner of William Street and Charles Street in the City of Fredericksburg and has been at that location since approximately 1846. It is listed in the National Register of Historic Places as part of the Fredericksburg Historic District ("FHD"). It "was likely created as a carriage step but became known as an auction block.[2] On this corner, auctioneers sold all types of goods, including enslaved African Americans. At least five slave sales here in the 1850s and early 1860s are documented, and many more likely took place." Petition at Law for Declaratory Judgment ("Petition"), ¶ 14 (quoting *Fredericksburg The Official Guide* (Historic Fredericksburg Foundation, Inc., 2014)). It is located in a public right of way and is thus the property of the City.

In light of its history, the slave auction block is understandably a controversial artifact. Many members of the community regard it with horror and disgust and want to see it removed. Others see it as a reminder of a less than honorable aspect of our history that nevertheless should not be forgotten, perhaps taking into account George Santayana's declaration that those who cannot remember the past are condemned to repeat it. (It also is possible that some people want the block to remain in its current location for less altruistic reasons.)

In August 2017, Councilmember Charlie L. Frye, Jr., the only African American member of the Council, asked the Council to consider the removal of the slave auction block from its current location at the corner of Charles and William Streets. The Council responded by

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[2] The City's archaeology study from January 2019 concludes, however, that evidence suggests that the block was not used as a carriage step, that the "size of carriage 'upping stones,' as they have also been called, also tend to be as wide as the tread of a typical staircase or larger to facilitate use .... The shape, size, and placement of the block at the corner of William and Charles Streets does not lend to its use as a carriage step." "Archaeological Testing of the George Street Tunnel and Intersection of William and Charles Street, City of Fredericksburg," by D. Brad Hatch, Kerri S. Barile, Danae Peckler, and Kerry S. Gonzalez, page 66. **Exhibit 12**, attached. Resolution of the original or historical use of the stone block is not possible, however, and is not required for the Court's decision.

creating a public input process that included an online survey and a special session of the Council to hear public comments. That session was held on September 23, 2017. On September 26, 2017, the Council voted to leave the slave auction block in place. *See* Petition, Exhibit H.

The Council chose, however, not to drop the matter at that point:

> In January 2018, City Council hired the International Coalition of Sites of Conscience (ICSC) to conduct a year-long community collaboration process, facilitating community conversations in small group settings, in which hundreds of people participated. The ICSC submitted three written reports to City Council, one at the conclusion of each phase of its work. The reports summarized the views of the community expressed through the community collaboration process. The Phase 3 Final Report was released on March 13, 2019 at a special meeting of the City Council, and contained the ICSC's recommendations for immediate, short term, and long-term actions, including with respect to the future treatment of the slave auction block.

Id.

On June 11, 2019, the Council approved a motion to remove the block and requested the City Manager to bring a plan to Council no later than July 9, 2019, to execute the removal by the end of the calendar year. *See* **Exhibit 1** (excerpt from official meeting minutes).

On July 9, 2019, the City Manager returned to Council as requested, with a relocation plan which included an application to the Architectural Review Board (the "ARB") for a certificate of appropriateness. **Exhibit 2**. The Council voted to approve the relocation plan. **Exhibit 3**. The City filed an application to the ARB for a certificate of appropriateness on July 31, 2019. (The City Manager signed and submitted the application, as the City's agent.) A copy of that application is Exhibit F to the Petition.

The ARB held four meetings on the City Manager's application, on August 12, September 9, September 23, and October 14, 2019, and received public comments at each of those meetings. *See* **Exhibit 4** (official minutes of the ARB). On October 14, 2019, a motion to

deny the certificate of appropriateness failed by a vote of two in favor, one opposed, three abstaining, and one member disqualified under the Conflict of Interests Act. **Exhibit 4.**

Section 72-23.1(C)(5) of the Fredericksburg City Code provides that the ARB "shall act to approve, approve with modification, or deny a request or application within 90 days of the official submission of the application." The 90 days allowed by that provision expired on or about October 20, 2019. The effect of the ARB's failure to act was the denial of the City's application for a certificate of appropriateness.

Section 72-23.1(F)(1) of the Fredericksburg City Code provides that any person aggrieved by a decision of the ARB "may appeal such decision to the City Council, provided that such appeal is filed in writing within 30 days from the date of the ARB's decision."[3] On November 7, 2019, within the 30 days allowed by § 72-23.1(F)(1), the City appealed the ARB's failure to make a decision to the Council,. **Exhibit 5.** On November 12, 2019, after consulting with the ARB (*see* **Exhibit 6**, page 20352), the Council enacted Resolution 19-100, sustaining the City's appeal and Granting a Certificate of Appropriateness for the Relocation of the Slave Auction Block to the Fredericksburg Area Museum. **Exhibit 7.**[4] That is the Resolution that Petitioners attack as *ultra vires* in this action.

After approving the Certificate of Appropriateness, City Council adopted Resolution 19-101, approving the Relocation Plan (**Exhibit 8**) and Resolution 19-102, approving a loan agreement with the Fredericksburg Area Museum for the auction block (**Exhibit 9**).

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[3] A provision of that nature is authorized by Va. Code § 15.2-2306(A)(2), which provides in part that a governing body may provide in an historical preservation ordinance (such as § 72-23.1 of the City Code) "that no historic landmark, building or structure within any district shall be razed, demolished or moved until the razing, demolition or moving thereof is approved by the review board, or, on appeal, by the governing body after consultation with the review board."

[4] A proposed Resolution, which became Resolution 19-100, is Exhibit H to the Petition.

THE STANDARD AND SCOPE OF REVIEW

The Petition presents a pure question of law – whether the Council's enactment of Resolution 19-100 was *ultra vires* – which is suitable for resolution on a motion for summary judgment. No material facts are in dispute. The exhibits submitted with this Brief are properly before the Court for consideration pursuant to Va. Code § 8.01-390(A) and Rule of Evidence 2:902(1) and, together with Exhibits F, G and H to the Petition, comprise the legislative record in this case.[5]

The Court's review of questions of law is, of course, de novo. That is true even though the action at issue – enactment of Resolution 19-100 – was a legislative action which otherwise would be subject to review under the "fairly debatable" standard. *See Norton v. City of Danville*, 268 Va. 402, 408-09 (2004). (The applicant-appellant in *Norton* challenged the Danville City Council's denial of his certificate of appropriateness appeal as arbitrary. That appeal was subject to fairly debatable review. These Petitioners have not asserted a similar challenge.) Virginia Code § 15.2-2306(3) grants the trial court authority to review the governing body's grant or denial of a certificate of appropriateness under the local historic preservation ordinance, not the validity of the ordinance itself. *Norton*, 268 Va. at 408. The Petition does not challenge the validity of City Code § 72-23.1, in any event.

Petitioners' claim that City Council's adoption of Resolution 19-100 was *ultra vires* is thus before the Court under the "contrary to law" standard of review set forth in Virginia Code § 15.2-2306(3) and City Code § 72-23.1(F)(2). This claim requires an application of the Dillon Rule, which will be discussed in more detail in the "Argument" section of this brief.

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[5] **Exhibits 10-12** technically are not part of the legislative record. **Exhibits 10-11** are subject to judicial notice as provisions of law, under Rule of Evidence 2:202. **Exhibit 12** is provided only for background information.

With respect to the scope of remedies that are available, Section 72-23.1(F)(2) of the Fredericksburg City Code provides in pertinent part that this Court "may reverse or modify the decision of the City Council, in whole or in part, if it finds upon review that the decision of the City Council is contrary to law," as Petitioners argue. Virginia Code § 15.2-2306(3) is identical, except that it refers generically to the "governing body" instead of the City Council. Neither Title 15.2 nor the City Code grants the Court the authority to "vacate and void" the Council's decision, however, as Petitioners request in their prayer for relief.

ARGUMENT

Introduction:

The Council's decision on June 11, 2019, to remove the slave auction block from its current location to the Fredericksburg Area Museum was an exercise of the Council's authority to manage, control, and dispose of the real and personal property of the City of Fredericksburg. It was made only after due and careful deliberation and extensive consultation with the community. It does not present a judicial question for this Court.[6]

The City Council's authority to manage and regulate the management, control, and disposition of real and personal property held by the City originates in City Charter § 1, which provides in relevant part as follows:

> The inhabitants of the City of Fredericksburg, Virginia, within the boundaries as now established or hereafter established in the manner provided by law, shall continue to be a body corporate and politic by name, the City of Fredericksburg, and under that name ... may acquire from any source real and personal property within or without its boundaries for any municipal purpose set forth in this charter ... and may sell, lease, mortgage, pledge, hold, manage, regulate the use

[6] The Petition states at ¶ 25 that the Council "**purported** to vote 6 to 1, on 11 June 2019, to excise the Slave Auction Block from its location at the northwest comer of William and Charles Streets, and to place it in the Fredericksburg Area Museum." (Emphasis added.) That action was within the Council's legislative authority; and aside from the Petition's use of the pejorative verb "purported," it is not challenged in this action.

> and management of, control, and dispose of such property as its interests may require ....

City Charter § 1, **Exhibit 10**, attached.

Thus, the June 11, 2019, City Council decision was an exercise of authority expressly granted in the City Charter to manage, control, and dispose of the City's property as its interests may require. It was not an exercise of the City's zoning authority under Virginia Code § 15.2-2306 or City Code § 72-23.1.

The Council's subsequent enactment of Resolution 19-100, on the other hand, was a valid exercise of the zoning authority granted to the governing body by Virginia Code § 15.2-2306, and it represented a final decision on appeal in accordance with the process set forth in Fredericksburg City Code § 72-23.1.

Petitioners' claim:

Petitioners assert that City Council's adoption of Resolution 19-100 "is utterly bereft of any statutory or ordinance authority, and is susceptible of being nullified by this Honorable Court." Petition, ¶ 8. Their position is articulated as follows, in ¶¶ 24-25 of the Petition:

> 24. That, in pertinent part, the above-referenced § 72-23.1 of the City Code confers the sole prerogative of ordering the moving of an "historic landmark, building or structure within the HFD", as plainly stated at the following excerpted provision of § 72-23.l(D) (3) (a):
>
> ***"No historic landmark, building or structure within the HFD shall be razed, demolished or moved until the razing, demolition or moving thereof is approved by the ARB."***
>
> (emphasis added) - full stop
>
> 25. That, in spite of the pellucidly clear language conferring upon the ARB the sole prerogative of ordering the moving an "historic landmark, building or structure within the HFD", the City Council ... purported to vote 6 to 1, on 11 June 2019, to excise the Slave Auction Block from its location at the northwest comer of William and Charles Streets, and to place it in the Fredericksburg Area Museum.

See also id., ¶ 32: "the 12 November 2019 Order of the City Council is irrefragably improper, *void ab initio,* and contrary to the Dillon Rule." Petitioners pray that "the subject 12 November 2019 action of the City Council be vacated and voided."

City Council is expressly authorized to grant a certificate of appropriateness on appeal from the ARB, by Virginia Code § 15.2-2306 and City Code § 72-23.1(F)(1):

Petitioners are mistaken. First, the plain language of City Code § 72-23.1(D)(3) confers no authority upon the ARB to "order" any action. The ARB's only authority is to review applications for regulated activities in the HFD, and to approve, approve with modification, or deny requests or applications, within 90 days. Likewise, the Council does not "order" an action when it decides an appeal from the ARB, and it did not order removal of the block when it granted a certificate of appropriateness.

Second, the Petitioners' truncated reading of the ordinance ignores subsection (F)(1), which authorizes the City Council to hear and decide appeals by any person aggrieved by a decision of the ARB. Subsection (D)(1) states that no principal building shall be erected within the HFD "unless approved by the ARB," and subsection (D)(2) states that no existing principal or accessory building or structure within the HFD shall be altered "unless approved by the ARB." Subsection (D)(3), quoted in the Petition, states that no historic landmark shall be moved "until . . . approved by the ARB." But the ARB is not the final authority for any of these applications. In all cases, a decision of the ARB may be appealed to City Council, and then to Circuit Court, under subsection (F), discussed in more detail below.

"Whether a municipality has the power to act is a question of law ...." *Bragg Hill Corp. v. City of Fredericksburg*, Record No. 180647, ___ Va. ___, 831 S.E.2d 483, 489 (2019). The *Bragg Hill* decision describes and explains the Dillon Rule, as follows:

> The Dillon Rule of strict construction controls our determination of the powers of local governing bodies.... Municipalities have only those powers that are (1) expressly granted by the General Assembly, (2) necessarily or fairly implied from those express powers, and (3) essential to the declared objects and purposes of the municipality.... Any act of a municipality that is beyond such powers is invalid....
>
> In applying the Dillon Rule, we first examine the plain terms of the legislative enactment to determine whether the General Assembly expressly granted a particular power to the municipal corporation.... [W]hen an enabling statute is clear and unambiguous, its intent is determined from the plain meaning of the words used, and, in that event, neither rules of construction nor extrinsic evidence may be employed....
>
> A municipal ordinance is invalid under Dillon's Rule if it exceeds the scope of authority granted by statute, or is inconsistent with a statute such that the ordinance and statute cannot coexist. . . . If an enabling statute and an ordinance can both be given effect, we 'harmonize them and apply them together.'

Id. at 489-90 (citations and quotation marks omitted).

Va. Code § 15.2-2306 ("Preservation of historical sites and architectural areas") relates to a local government's police power – its regulatory or zoning authority. It explicitly authorizes "[a]ny locality" to adopt an ordinance setting forth, *inter alia*, "buildings or structures within the locality having an important historic, architectural, archaeological or cultural interest, [and] any historic areas within the locality." *Id.*, subsection (A)(1). It states that a governing body "may provide for a review board to administer the ordinance." *Id.*

As Petitioners acknowledge (*see* Petition, ¶ 20), the Fredericksburg City Council has enacted such an ordinance. Specifically, Fredericksburg City Code § 72-34.1 **(Exhibit 11)** establishes the "Old and Historic Fredericksburg District," and Fredericksburg City Code § 72-23.1 "provide[s] for a review board" (the ARB) "to administer the ordinance through consideration of applications for certificates of appropriateness."

Section 15.2-2306(A)(1) goes on to provide that a local ordinance "may include a provision that no building or structure, including signs, shall be erected, reconstructed, altered or restored within any such district unless approved by the review board **or, on appeal, by the governing body of the locality** as being architecturally compatible with the historic landmarks, buildings or structures therein." (Emphasis added.) Subsection (A)(2) contains a similar provision, with respect to removal of historic landmarks: the ordinance may provide "that no historic landmark, building or structure within any district shall be razed, demolished or moved until the razing, demolition or moving thereof is approved by the review board, **or, on appeal, by the governing body after consultation with the review board.**" (Emphasis added.) Subsections D(1), D(2)(a), and D(3)(a) of City Code § 72-23.1 incorporate the same distinction.

Finally, Virginia Code § 15.2-2306(3) states that "[t]he governing body **shall** provide by ordinance for appeals to the circuit court for the locality **from any final decision of the governing body pursuant to subdivisions 1 and 2 of this subsection** and shall specify therein the parties entitled to appeal the decisions ...." (Emphasis added.) The governing body "may" provide for a review board to administer the ordinance, but it "shall" provide for appeals to the circuit court from any "final decision of the governing body." Thus, the statute requires that the governing body, not the architectural review board, is the final decision maker for certificates of appropriateness. Appeals from the "final decision" of the governing body are made to circuit court.

Fredericksburg City Code § 72-23.1 is consistent with the express grant of authority in Virginia Code § 15.2-2306. Under § 72-23.1(D)(1), no new construction within the HFD may take place until approved by the ARB. Under § 72-23.1(D)(2), no existing structure within the HFD may be altered unless approved by the ARB; and under § 72-23.1(D)(3), no historic

landmark within the HFD may be moved until approved by the ARB. None of these subsections sets forth the right of appeal to City Council. Instead, under City Code § 72-23.1(F)(1), any person aggrieved by a decision of the ARB may appeal to City Council; and any person aggrieved by a decision of the City Council may appeal to Circuit Court under § 72-23.1(F)(2). The appeals provisions for the HFD are organized in subsection (F) of §72-23.1. The enabling statute and the ordinance can both be given effect, and shall be harmonized and construed together.

City Code § 72-23.1 must be read as a whole. *E.g.*, *Frace v. Johnson*, 289 Va. 198, 201 (2015). But Petitioners' argument that City Council acted without legal authority in adopting Resolution 19-100 cites the language of subsection (D)(3) while ignoring the language of subsection (F)(1) of the same Ordinance.

As far as can be determined from their Petition, Petitioners appear to have overlooked § 72-23.1(F)(1) – even though they rely on the adjacent subsection, (F)(2), as authority for their appeal to this Court.[7] *See* Petition, ¶¶ 2, 20. But City Code § 72-23.1(F)(1) is the express grant of authority for the City Council to hear and decide appeals from decisions of the ARB under its authority in subsections (D)(1), (D)(2), or (D)(3). If Petitioners' reasoning were accepted, then no decisions of the ARB could be appealed to City Council. It would always act in an *ultra vires* capacity when hearing appeals. Subsection (F)(1) would be meaningless. And the appeal process in subsection (F)(2) would likewise be meaningless – the ARB would be the final decision maker on all applications, and no person could be aggrieved by a decision of the City Council with a right of appeal to this Court. *But cf. Norton v. City of Danville*, *supra*, 268 Va. 402

[7] In fairness, it must be noted that ¶ 19 of the Petition quotes Va. Code § 15.2-2306(A)(2), which authorizes inclusion of a procedure for appeals to the governing body in a local ordinance such as § 72-23.1 of the City Code. But it does not refer to City Code § 72-23.1(F)(1), which implements that authorization.

(appeal to Circuit Court from Danville City Council's denial of a certificate of appropriateness, on appeal of a Danville Commission of Architectural Review).

The written statement of the ARB Chair does not support Petitioners' position:

Finally, ¶¶ 29-30 of the Petition cite and incorporate a written statement which the Chair of the ARB entered into its record at its hearing on the City's application on August 12, 2019 (Exhibit G to the Petition). The Chair's position, however, was that the ARB had "no role … in the decision about whether or not to move the artifact AFTER City Council has already decided that it WILL be moved." The Chair's conclusion that only City Council could act, and that the ARB had **no** role to play, is directly opposed to Petitioners' argument that the City Code confers **sole** authority to order the relocation of the auction block on the ARB.

The Chair's statement articulates the author's opinion as follows:

> There were two ways the ARB could have ruled on moving this artifact: (1) the City could have gone through the application process with the ARB before the City Council vote; or (2) City Council could have voted to move the artifact contingent on ARB's approval. In either case: ***seeking ARB approval first.***
>
> But that's not what happened. The decision to move the artifact has already been made, and it was made by a higher authority than the ARB. *The issue is moot now.*

Petition, Exhibit G (emphases in original). The statement continues by expressing the opinion "that once City Council has made a final decision, it is beyond our reach. We can't affirm, reverse, or modify their decision to move the artifact." *Id.* (quoting in a footnote Va. Code § 15.2-2306(A)(3), which requires a local ordinance to provide for appeals to a Circuit Court of final decisions of governing bodies, on appeal from decisions of a review board, granting or denying certificates of appropriateness). "The ARB has no expressed or implied powers to reconsider City Council's final decision." *Id.*

The Chair and Petitioners – to the extent that they intend to incorporate the Chair's statement as an additional or alternative argument, despite its inconsistency with their position that the ARB has exclusive authority in this matter – are mistaken as a matter of law. The Council's action on June 11, 2019, did not grant a certificate of appropriateness and was not a "final decision" within the meaning of Va. Code § 15.2-2306(A)(3). That section – which is quoted accurately in the Chair's footnote, in pertinent part – provides:

> The governing body shall provide by ordinance for appeals to the circuit court for such locality from <u>any final decision of the governing body</u> <u>*pursuant to subdivisions 1 and 2 of this subsection*</u> and shall specify therein the parties entitled to appeal the decisions, which parties shall have the right to appeal to the circuit court for review by filing a petition at law, setting forth the alleged illegality of the action of the governing body, provided the petition is filed within thirty days after the final decision is rendered by the governing body.

Emphases added. The only "final decision[s]" of governing bodies "pursuant to subdivisions 1 and 2 of [that] subsection" are final decisions either granting or denying certificates of appropriateness, "**on appeal**, by the governing body of the locality" (subdivision 1) and "**on appeal**, by the governing body after consultation with the review board" (subdivision 2) – in both instances, on appeal to a governing body from decisions of an ARB.

The Council did not grant a certificate of appropriateness on June 11, 2019, and as a matter of law it had no power to do so at that time. Its action on that date was taken in its legislative and proprietary capacity, as the City's legislative body and as owner of the auction block. The City Manager in turn submitted an application to the ARB for a certificate of appropriateness, on behalf of the City, as directed by City Council on July 9, 2019; and he appealed the ARB's failure to act on that application, again on behalf of the City. When it decided that appeal, the Council acted under its zoning authority, authorized by Virginia Code § 15.2-2306 and conferred by City Code § 72-23.1, and granted the requested certificate.

The Council's action on June 11, 2019, approving a motion to remove the slave auction block and requesting the City Manager to bring a plan to Council to execute the removal by the end of the calendar year, thus was not a "final decision" within the meaning of Va. Code § 15.2-2306(A)(3) – or, for that matter, in any other respect. It was not a decision under Va. Code § 15.2-2306 **at all**. It was not a decision on appeal from the ARB, and it did not grant a certificate of appropriateness. It was a decision to remove the slave auction block, pursuant to the City's Charter authority with respect to the control of its own real property. That said, however, as a matter of law the Council could not carry out that decision without going through the regulatory review procedure specified by § 72-23.1 of the City Code.

Finally, the ARB's failure to take action on the City's application does not does not disable the Council from proceeding on the appeal, as provided by § 72-23.1(F)(1). That too would be an absurdity. An owner undeniably could appeal to the Council from a decision by the ARB to refuse a certificate of appropriateness, and an opponent with sufficient standing could appeal a decision to grant such a certificate. The ARB's failure to make a decision does not lead to a different result; the effect was to deny the required zoning approval. The ARB does not have a pocket veto power.

CONCLUSION

The Fredericksburg City Council's enactment of Resolution 19-100, "Granting a Certificate of Appropriateness for the Relocation of the Slave Auction Block to the Fredericksburg Area Museum," was regular in all respects and fully in compliance with the Dillon Rule. Petitioners' arguments are legally erroneous. The Council submits that it is entitled to judgment, as a matter of law, and respectfully asks the Court to enter a final judgment in its favor dismissing the Petition.

Respectfully submitted,

By: _____
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Brief in Support of Motion for Summary Judgment was hand delivered to counsel for Plaintiffs, named below, on this 27 day of December, 2019.

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