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Comparison Between Nellie Custis School & Wilson School LHD Nomination Forms

1 message

President, Aurora Highlands Civic Association <president@aurorahighlands.org>Fri, Jun 12, 2026 at 9:59
PM

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Dear Arlington County Board,

In our conversations over the last few weeks, you have expressed concern over the historical analysis of Nellie Custis School based on the Nomination Form study and have asked some very pointed questions. In response, I am forwarding the following comparison of the Wilson School and Nellie Custis School Local Historic District Nomination Forms received from anonymous Aurora Highlands residents. (Many residents in Aurora Highlands work in sensitive government positions that do not allow direct advocacy.) I urge you to read the material which concludes the Nellie Custis School Historic District Designation Form cannot be relied on because it applies an inconsistent standard to the zoning code when compared to the previous Wilson School report.

The original documents are attached to this email for your convenience if you want to review the source material directly. Thank you.

Regards,

Stacy Meyer
President

COMPARING AND CONTRASTING NELLIE CUSTIS SCHOOL (NCS) HISTORIC DISTRICT DESIGNATION FORM REPORT AND WILSON SCHOOL (WS) HISTORIC DISTRICT DESIGNATION FORM REPORT

EXECUTIVE SUMMARY

The Wilson School was nominated for a Local Historic District in 2009, and the Historic Preservation Staff supported the nomination under four criteria: ACZO 11.A.4(a), (b), (f), and (k).

The Nellie Custis School was nominated for a Local Historic District in 2026, and the Historic Preservation Staff did not support the nomination, only finding that the school met criterion ACZO 11.A.4(a). These

schools are very similar, raising questions about why one received staff support while the other did not when similar criteria were considered.

We found that the interpretation of comparable facts changed significantly between the two reports. If Nellie Custis School had been reviewed through the same lens as Wilson School, staff would have clearly supported the nomination as they did for Wilson School. This raises significant concerns about the consistency of interpretation of the facts and a lack of objectivity in the Nellie Custis School report, especially considering the County has already approved demolition of the building in the Special GLUP Study (February 2025), and it appears to now seek justification for its previous decision, which was made in advance of the LHD study and over the objections of HARLB.

1. OVERALL TONE

The overall tone of the narrative sections of the reports is markedly different. In the WS report, the language is descriptive and gives the reader a sense of place and atmosphere. The language in the NCS report is more clinical, lacking descriptive language and distinctly different in tone.

The immediate focus of the NCS report is on alterations that have “affected the building’s sense of design, materials, and workmanship” (see p. 2 of the NCS report), rather than a discussion of the elements of the historic core that remain—an immediate departure from the approach taken on page 2 of the WS report.

2. DESIGNATION CRITERIA REVIEW

The WS report concluded that four Local Historic District designation criteria apply to WS. Arguably, these same criteria can also apply to NCS, yet the NCS report does not sufficiently explain why three of the four are not applicable. (See PDF p. 25 of the WS report for a discussion of eligible criteria.)

Criterion (ACZO 11.A.4(b))

The building conveys character, interest, or value as part of the development, heritage, or cultural characteristics of the county, state, or nation.

WS report reasoning: WS has a historical association with the development of public education in Alexandria County in the early twentieth century and the growth of the Fort Myer Heights/Rosslyn area during the same period. It was recognized as the second-oldest extant school building in Arlington and was used continuously as an elementary school for 58 years and for assorted community functions for 98 years.

Why NCS should also qualify: NCS has a similar historical association, and this association is not disputed in the NCS report. However, the HPP did not conclude that this criterion applies to NCS and does not sufficiently explain why NCS is not historically significant because of its association with the development of public education in Arlington County during the early twentieth century.

NCS is the fourth-oldest school building in Arlington County and the first to be built after Alexandria County became Arlington County. It has the same association with the development of public education, and the NCS report does not explain why NCS is not historically significant for this reason. NCS continuously operated as a public school from 1924–1978. Since 1979, it has served as an educational and occupational training center for people with disabilities, thereby continuing to fulfill an educational function similar to WS.

Notably, the majority of members who voted in favor of the Local Historic District designation at the March 17, 2026 HALRB meeting stated that NCS, as a historic school, met Criterion 11.A.4(b).

Criterion (ACZO 11.A.4(f))

Work of a notable architect.

WS report reasoning: WS was the first Alexandria County commission of architect Charles Morrison Robinson, who designed several hundred public schools throughout Virginia and some of the Commonwealth’s most prestigious college campus buildings.

Why NCS should also qualify: NCS was an early or first commission by the notable architectural firm Upman & Adams who designed many buildings in the area, this is based on documentary evidence included in the

NCS report showing an advertisement that bids were being taken on construction based on plans by Upman and Adams.

WS report conclusion: The WS report concludes that it is historically significant that Robinson designed many schools in Arlington County. There is no discussion of how WS compares to other Robinson-designed schools in terms of historic integrity.

NCS report conclusion: In contrast, the NCS report concludes that although NCS was designed by Upman & Adams, there are other examples of Upman's work that retain greater architectural integrity and, therefore, NCS is not eligible under Criterion F as described in §11.3.4.A of the ACZO as a work of a master architect or master builder.

The NCS report states:

"Although the building was likely designed by the architectural firm Upman & Adams, a notable architectural firm, there are other surviving examples of their work within the County's public-school system—such as Barcroft Elementary School, the Lee Arts Community Center, and possibly the Hoffman Boston Elementary School—that retain a higher degree of architectural integrity." (NCS report, p. 24) This appears to be a subjective conclusion. The report does not clearly explain what distinguishes NCS from other Upman & Adams buildings or why those buildings continue to convey their historic and architectural significance while NCS cannot.

A completely different standard was used for NCS than WS in rejecting NCS.

Nevertheless, most of the HALRB members that voted for the LHD cited this criterion as applicable at the March 17, 2026 meeting because it was clearly shown via the newspaper clipping Figure 20 in the report that NCS was designed by notable architects Upman and Adams, which is all there is to it.

Criterion (ACZO 11.A.4(k))

Suitability for preservation or restoration.

WS report reasoning: The original 1910 main block remains, and much of the original form, massing, and materials are still evident. Sufficient historic documentation exists that could aid in an accurate restoration of the building.

Why NCS should also qualify: The NCS report does not discuss whether sufficient historic documentation exists that could aid in an accurate restoration of the building, although there are, at a minimum, photographs of the original building and the 1932 addition. Photographic evidence is considered sufficient documentation for restoration purposes.

The NCS report does not explain why the original form of the 1924 and 1931 portions of the building is no longer evident, nor does it discuss whether one can still understand the layout of the original section of the building. It also does not provide a survey to illustrate its findings.

The NCS report notes that "the rectangular-plan building is situated in the eastern portion of the parcel and has an east-west orientation. The building includes a two-story 1924 section, two-story wings constructed in 1931 that flank the 1924 section, a one-story T-shaped 1962 addition on the west and south elevations, and a 1995 entrance addition constructed between the east elevation of the 1962 addition and the west elevation of the 1931 wing," but does not explain how the original form is no longer evident—especially when the original form is clearly identifiable as the two-story portion of the building versus the one-story later additions.

The NCS report also notes that "most of the interior integrity of the 1924/1931 portions of the original building is expressed through the corridor volume and overall composition and layout. Otherwise, interior physical integrity is limited."

This is similar to the status of the interior of the Wilson School at the time of the WS report. The WS report stated:

"Site visits conducted by the Historic Preservation Program staff in March 2007 and August 2008 revealed that little original interior fabric remains. However, despite the loss of the original central entrance and interior stair hall during the 1957 remodeling, one can still understand the layout of the original section of the building—two large classrooms on each end of the two main levels."

Both buildings' form, massing, and materials were in place, despite reversible alterations. The only difference is that NCS is held to a stricter and inconsistent standard.

After a discussion about suitability for restoration, 10 of 12 HALRB members stated at the March 17, 2026 meeting that NCS is suitable for restoration.

3. DISCUSSION OF HISTORIC INTEGRITY

The NCS report concludes that NCS does not retain sufficient architectural integrity from its period of significance (1924–1978) to convey its historic significance, based on the seven aspects of historic integrity defined by the National Park Service. By contrast, the WS report does not even discuss the seven aspects of historic integrity defined by the National Park Service, nor does it evaluate how those aspects apply to WS during its period of significance (1910–1968). The discussion of historic integrity is not material to the ACZO discussion because a building that is contributing to a National Register is, by definition, deemed to have historic integrity. That fact is excluded from the NCS report.

The NCS report states that NCS is indisputably a contributing resource within the Aurora Highlands NRHP Historic District and therefore qualifies under Criterion A of Sec. 11.3.4.A of the ACZO. However, the report further states that if NCS were evaluated as a standalone property, its alterations would likely render it ineligible for individual listing in the NRHP.

However, commentary regarding whether NCS would qualify as an individually listed property is of limited relevance to the question before the County. The undisputed fact remains that NCS is a contributing resource within the Aurora Highlands NRHP Historic District.

The NCS report goes on to conclude that the following aspects do not apply to NCS:

Association: The report states that NCS no longer conveys its historic association because it no longer functions as a public school and now serves a nonprofit mission.

This conclusion is debatable because the building continues to serve an educational function as required due to the deed restriction “for school purposes only.”

Design, Materials, and Workmanship: The report states that extensive alterations—including the 1962 addition, removal of the main entrance, modification of window openings, replacement of windows and doors, and interior alterations—have significantly diminished the building's integrity of design, materials, and workmanship.

Similar alterations are described in the WS report:

- The Wilson School's main entrance was removed in 1957.
- Original windows were replaced in the basement, first story, and second story.

The WS report concluded:

“While it is not as sympathetic to the original building as the 1925 addition, the 1957 addition [to the Wilson School] and remodeling now technically can be considered historic (as defined by the minimum 50-year age requirement used by the National Park Service).”

The same reasoning could reasonably apply to the 1962 addition to NCS, but was not.

The idea that cumulative alterations necessarily diminish architectural integrity appears inconsistent with the WS report as well, which states on page 26:

“What is most compelling about the Wilson School—when compared to other historic schools in the County, as well as to the most recent local designation of the historic Swanson Middle School in Westover—is the overall significance of the building's contextual history rather than its current tangible physical appearance. The Wilson School is a testament to how community and educational facilities can be altered and modified over time as needs and priorities change—and still remain viable resources.”

But when it comes to NCS, those same alterations are used as reasons to state the building does not retain historic integrity, which is inconsistent with the WS report.

4. SUMMARY

There is a lack of consistency between these two reports reviewing the same criteria for very similar schools. The interpretation of comparable facts changed significantly between the two reports. If Nellie

Custis School had been reviewed through the same lens as Wilson School, staff would have supported the nomination as they did for Wilson School. This raises significant concerns about the interpretation of the facts and a lack of objectivity in the Nellie Custis School report, especially considering the County has already approved demolition of the building in the Special GLUP Study (February 2025), and it appears to now seek justification for its previous decision, which was made in advance of the LHD study and over the objections of HARLB.

As a result, the NCS report cannot be relied upon as an objective analysis of the ACZO LHD criteria or the historic integrity of the school.

2 attachments



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