

Stacy Meyer  
Stacy.meyer@ymail.com  
Via email

June 17, 2024

Mr. Omari A. Davis, Chair  
Historic Affairs and Landmark Review Board  
Arlington County  
2100 Clarendon Boulevard  
Arlington, VA 22201

Re: Nellie Custis School Local Historic District Application

Dear Chair Davis,

Attached please find additional notes in support of the Local Historic District Application for Nellie Custis School and a summary below.

Nellie Custis School is a notable central element anchoring the historic Aurora Highlands neighborhood. It is likely built from bricks made locally right on the shore of the Potomac River. It has served generations for a century, first as an early model of a modern “multi classroom” building (as opposed to the one room schools of prior times). Later, it played a role in the desegregation in Arlington County, making Arlington County the first county in Virginia to fully desegregate. In its most recent iteration, it served as a training facility for people with disabilities. Yet, there is still much to learn about this building its history and role in the development of Arlington County which is why the study for the Local Historic District is so important.

Unfortunately, this graceful building is in trouble. With the acceptance by the County Board of the Melwood Special GLUP Study last month, the Nellie Custis School is at serious risk of being demolished. But the local community does not agree with that approach. The residents of Aurora Highlands voted nearly unanimously on June 12, 2024, in support of the Local Historic District designation, in addition to previous nearly unanimous votes to oppose to the GLUP Study which proposed demolition of the school. And, there are individuals in the Office of Historic Preservation, on the Planning Commission and County Board members who also want to see Nellie Custis School preserved.

During my career as an architect, I worked on many historic preservation projects in the places around Arlington (but not in Arlington) because these other places actually care about history: the adaptive reuse of tobacco warehouses in Shockoe Bottom in Richmond, the old Garfinkle’s and Hecht’s department stores sites in Washington, DC, and most recently on the adaptive reuse of the Langston-Slater School in Washington, DC. I know from experience it is not possible to

calculate on a spreadsheet the intrinsic value of preserving a building, which is why these buildings need protection and tax credits / air rights exchanges to help in their preservation. **It is not easy, but it is worth it.**

Especially in these times of high land values and drive for density, financially driven landowners (that includes governments and non-profits) do not want to preserve these “inconvenient” historic buildings and would rather tear them down. We know these financially driven landowners do not want these preservation requirements, but that is the exact reason a Local Historic District designation is so vitally important. Especially in this case, it was known when Melwood *acquired the public Nellie Custis School in 2018 that there were severe limitations on use and a historic designation, but Melwood is now trying to change that despite community opposition, and in the process demolish this historic school, which has been an anchor of the community for a century.*

People who care about historic preservation were horrified by the recent demolition of the Wilson School and the Rouse Estate, and want to know make sure that doesn't happen again. But, Melwood desperately wants those tragedies to serve as a precedent and asks the county to now cheer on the demolition of Nellie Custis School as well – and if that happens, there will be no stopping demolition of the next building and the one after that.

There are ways to sensitively develop this site without demolition of the Nellie Custis School and without planting a gargantuan building in the middle of a historic single-family neighborhood. It is just that Melwood does not care about doing that, and the county to date has not required it. The county also talks a lot of combatting climate change and sustainability, yet ignores the fact that the greenest building is the one that is already built.

The community is grateful for the Local Historic District designation program and request that HALRB move the process of creating a Local Historic District, should it agree, as we expect it will, with this assessment. Thank you,

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Stacy Meyer', with a long horizontal flourish extending to the right.

Stacy Meyer, RA, LEED AP

CC: Mical Tawney, HALRB Staff (mtawney@arlingtonva.us)  
HALRB Members  
Mark Schwartz, County Manager  
Arlington County Board

**Nellie Custis School Local Historic District**  
**Application Notes**

June 16, 2024



Nellie Custis School, 1932  
750 S. 23<sup>rd</sup> Street  
A Contributing Building to the Aurora Highlands Historic District

<https://libraryarchives.arlingtonva.us/Detail/objects/5842>

*The past is not the property of historians; it is a public possession. It belongs to anyone who is aware of it, and it grows by being shared. It sustains the whole society, which always needs the identity that only the past can give. In the Grapes of Wrath John Steinbeck pictures a group of Oklahoma farm wives loading their goods into an old truck for the long trip to California. They did not have many possessions, but there was not room for what they had.*

*“The women sat among the doomed things, turning them over and looking past them and back. This book. My father had it. He liked a book. Pilgrim’s Progress. Used to read it. Got his name in it. And his pipe—still smells rank. And this picture—an angel. I looked at that before the fust three come—didn’t seem to do much good. Think we could get this china dog in? Aunt Sadie brought it from the St. Louis fair. See? Wrote right on it. No, I guess not. Here’s a letter my brother wrote the day before he died. Here’s an old-time hat. These feathers—never got to use them. No, there isn’t room .... How can we live without our lives? How will we know it’s us without our past?” (Steinbeck).*

*These are not members of a historical society. They had never seen a museum or a memorial. They were just people, asking a poignant and universal question: “How will we know it’s us without our past?” We do not choose between the past and the future; they are inseparable parts of the same river.*

*Dr. Walter Havighurst, Quoted by Carl Feiss in U.S. Conference of Mayors, With Heritage So Rich (New York: Random House, 1966), p. 1-2.*

## Contents

- Local Historic District History
- Nellie Custis School Local Historic District Application
- Aurora Highlands Historic District
- History of Nellie Custis School – 750 S. 23<sup>rd</sup> Street
- Local Historic District Requirements per ACZO 11.3.4.A.4
- Final Thoughts

## Local Historic District History

Arlington County's Comprehensive Plan has 12 tenets to guide the county, one of which is the Historic and Cultural Resources plan. **That plan includes historic preservation as its primary goal.** From the Arlington County website on Historic Preservation:

*Historic buildings and sites serve as important visual and tangible links to our heritage. Designation helps us protect and share our history and instill a sense of pride within our community.*

However, in reality, no non-residential buildings (including commercial buildings, community buildings, Forts, apartment complexes, institutional building, places of worship and schools) have been preserved in a Local Historic District since the Stratford School was made a Local Historic District in 2016.

Unfortunately, recent applications have been unsuccessful. The HALRB recommended a study at the Rouse Estate in 2020, yet, it was torn down a few months later to make way for a Toll Brothers residential development.



Demolition of the Febrey-Lothrop Estate / Rouse Estate

[https://www.insidenova.com/news/real\\_estate/historic-affairs-body-asks-study-to-determine-provenance-of-rouse-estate/article\\_0268bc7c-3562-11eb-a935-a73d5025d2f4.html](https://www.insidenova.com/news/real_estate/historic-affairs-body-asks-study-to-determine-provenance-of-rouse-estate/article_0268bc7c-3562-11eb-a935-a73d5025d2f4.html)

Even the Arlington School Board, with backing of the County Board demolished the 105-year-old Wilson School in Rosslyn in 2017, in favor of what the county attempts to label historic preservation but is not in any way historic preservation. It is demolition and “incorporating bits and pieces of the old building into the new school.” The County Board’s past complete disregard for historic preservation would not be acceptable elsewhere in the region, the state or the country because everywhere else, there is a sincere appreciation for the authenticity of historic buildings that cannot be replaced once they are gone, which has been severely lacking by the leadership of Arlington County.

[https://www.washingtonpost.com/local/virginia-politics/arlington-wont-call-105-year-old-wilson-school-historic/2015/04/18/58192ca2-e5ee-11e4-81ea-0649268f729e\\_story.html](https://www.washingtonpost.com/local/virginia-politics/arlington-wont-call-105-year-old-wilson-school-historic/2015/04/18/58192ca2-e5ee-11e4-81ea-0649268f729e_story.html)



Not Historic Preservation of the Wilson School, 2017

<https://www.arlnow.com/2017/07/07/demolition-underway-at-wilson-school-site-in-rosslyn/>

Despite the recent unfortunate demolition of these two notable Arlington landmarks, which should still be standing today, this application for the preservation of Nellie Custis School was submitted under the premise **that attitudes can and do change and we can do better**. For example, just a couple of months ago legislation was passed at the state level to provide additional protections for historic preservation in response to the Febrey-Lothrop Estate tragedy.

If it is the will of Arlington County to no longer preserve historic buildings, the County should say so in its Comprehensive Plan and eliminate the Local Historic District application. However, this is not what the County wants to do, and it has not done so to date. Therefore, the expectation is for HALRB to review this application and not consider these past failures as precedent, and review with the full expectation that the future County Board decisions will respect Arlington’s history and expand the telling of its story.

## Nellie Custis School Local Historic District Application

On April 13, 2024 Arlington County published the Melwood Special Land Use Study (the “Study”). The Study was requested by the Melwood Horticulture Training Center, represented by Walsh Colucci, the same firm that represented the developers who demolished the Febrey-Lothrop Estate building.

The Study recommends two scenarios for redeveloping the site of the Nellie Custis School – neither of which includes preservation of the historic Nellie Custis School building. The Study recommends new buildings up to 60’ in height that threaten the scale of the historic Aurora Highlands single-family neighborhood, and the Study specifically recommends demolition of Nellie Custis School. The choice provided is to put a 60’ building in a historic single-family neighborhood adjacent to houses that are 25’ tall but keep the façade of the Nellie Custis School building, or put a 45’ tall building in and demolish the façade (but, possibly relocate pieces of the façade or individual bricks for “interpretation”). The Aurora Highlands Civic Association (AHCA), the civic association that represents the community in which the site resides recommended rejection of the Study in its comments that can be found here:

<https://aurorahighlands.org/wp-content/uploads/Melwood-Special-Land-Use-Study-AHCA-Zoning-Committee-Review-240503-final.pdf>

The Study options for development of the Melwood site both subsume Nellie Custis School:

Figure 8. Scenario 2: 45' Building Height



Figure 9. Scenario 3: 60' Building Height



The level of density proposed is equivalent to High Density Mixed Use, which is unprecedented in the middle of a historic single-family neighborhood in Arlington. Melwood, through Walsh Colucci, claims they cannot build a project smaller than 104 apartment units + 20K SF for their training program, yet the majority of the projects by their development partner, Wesley Housing, are a much more appropriate size, in the 30 – 80-unit range, as is also encouraged by Virginia LIHTC rules for approving housing projects. An appropriately sized building would easily allow preservation of the Nellie Custis School but any smaller project was rejected by Melwood.

On April 14, 2024 due to the new threat of demolition, the application to create a Local Historic District at Nellie Custis School was submitted to Arlington County. The application can be found here:

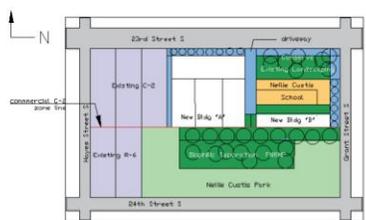
[https://www.arlingtonva.us/files/sharedassets/public/v/1/commissions/documents/drc-halrb/june-2024/nelly-custis-school\\_lhd-nomination-application-form-and-photos\\_redacted.pdf](https://www.arlingtonva.us/files/sharedassets/public/v/1/commissions/documents/drc-halrb/june-2024/nelly-custis-school_lhd-nomination-application-form-and-photos_redacted.pdf)

On April 24, 2024, AHCA approved, nearly unanimously, an “Alternate Envelope” that will allow the site to be redeveloped at an appropriate scale while preserving / adaptively reusing Nellie Custis School. This Alternative Envelope as well as an analysis of the Study was presented to each of the members of the Planning Commission and County Board in May of 2024.

<https://aurorahighlands.org/wp-content/uploads/Melwood-Special-Land-Use-Study-AHCA-Zoning-Committee-Review-240503-final.pdf>

<https://aurorahighlands.org/wp-content/uploads/Melwood-GLUP-Study-AHCA-Comments-240430.pdf>

### The Appropriate Size Envelope Is About Half the Size of the Proposal



**CALCULATIONS**

**NELLIE CUSTIS SCHOOL**  
 Nellie Custis School @ 7100 SF x 2 stories = 14,200 SF,  
 Add 1 Mary penthouse 2.1 setback 3000 SF = 17,200 SF.

**NEW BUILDING A**  
 Use ground floor for retail program, 21,500 SF  
 Upper 10 floor offices 15,000 SF x 2 = 30,000 SF (Letter "O" shops) – step down as required to meet 35' H. limit.

**NEW BUILDING B**  
 10 building 30' x 3 stories = 3000 SF = 11,700 SF

Total = 80K SF

Given that neither alternative in the Study provided an appropriate development envelope, we worked backwards – we asked, given the site constraints of the park separation, height limitation, tree canopy requirements, etc., what would the appropriate size of a development on this site look like? Assumptions below:

- require a 35' height limit,
- preserve the historic Nellie Custis School building and mature landscaping,
- manage all parking on site, and loading off 23<sup>rd</sup> Street
- Include driveways for fire access, loading and trash
- require heavy evergreen continuous biophilic separation between the proposed building and Nelly Custis Park in line with the existing R-6/C-2 demarcation line,
- require measurable and maximum light and noise pollution reduction measures,
- require adequate open space to support well being of residents and,
- provide a 10' setback at the west side.

The plan diagram view to the left is an **example** of a layout that includes all of the required assumptions for the site. The appropriate maximum sized development for this site is approximately 80K SF, just over half of the 145K SF proposed.

On May 18, 2024, the County Board accepted the Melwood Special Land Use Study putting the wheels in motion for a series of approvals that could result in the demolition of the historic school as recommended by the Melwood Special Land Use Study. However, despite the acceptance of the Study, some planning commissioners and County Board members have expressed great interest in preservation of the Nellie Custis School building.

There are only two schools that are older than Nellie Custis in Arlington: Hume, 1891 and Maury 1910. These are already Local Historic Districts. Additionally, Swanson built in 1939 and Stratford built in 1950 are also Local Historic Districts. It is surprising that Nellie Custis School is not already a Local Historic District.

<https://www.arlingtonva.us/Government/Projects/Plans-Studies/Historic-Preservation/Local-Historic-Districts>

Nellie Custis School is older than every one of the 21 buildings on the Essential list in the County’s Historic Resources Inventory and older than every building on the entire list except for three. It is also far more significant (known to the community, unique in its architecture) than the buildings on the list. It is surprising that Nellie Custis School is not already on this list as well.

<https://www.arlingtonva.us/Government/Projects/Plans-Studies/Historic-Preservation/Resources-Inventory>

## Aurora Highlands Historic District

The Aurora Highlands Historic District was listed on the National Register of Historic Places, VDHR 000-9706 in 2008. Aurora Highlands was listed because “it is associated with events that have made a significant contribution to the broad patterns of history and it embodies distinctive characteristics of the time.”

The application and detailed description of the neighborhood can be found here:

[https://web.archive.org/web/20130813145324/http://www.dhr.virginia.gov/register/Counties/Arlington/000-9706\\_Aurora\\_Highlands\\_HD\\_2008\\_NRfinal.pdf](https://web.archive.org/web/20130813145324/http://www.dhr.virginia.gov/register/Counties/Arlington/000-9706_Aurora_Highlands_HD_2008_NRfinal.pdf)

Not included in the National Register description, prior to being known as National Landing and before that Crystal City, the Aurora Highlands Neighborhood was known for decades as “Brick Haven” an industrial zone home to many local brick companies – Virginia Brick Company, J Appleman Brick Yard, W. Walker Brick Works, Ford Brick Company, WH West Brick Works, New National Brick Company and WC Morrison Brick Works. These were the brickmakers that made the bricks for the streets and buildings of expanding Washington DC and Alexandria. From an article in the “Clay Making” journal of 1903 p 645: “it is said that the output in 1903 was in the range of 100,000,000 brick.” Yet, there is little surviving history available about “Brick Haven” – those buildings were torn down to make way for Crystal City.



1894 Map of the Aurora Highlands Vicinity

<https://www.loc.gov/resource/g3850.ct003624/?r=0.357,0.619,0.097,0.081,0>

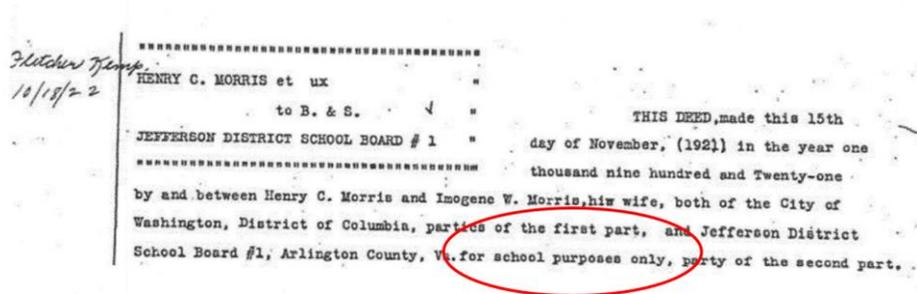


Olvert and Rogers, West Brothers Brick kilns (Crystal City). Photo from Center for Local History, Arlington Public Library. *Arlington, Va., 1920 Storymap.*

While hundreds of millions of bricks were made in what is now Aurora Highlands, there are few examples of public brickwork in Aurora Highlands like there are in Washington or Alexandria. The Nellie Custis School building, originally built 1923, is one of the oldest surviving and in tact examples of brick public buildings still in existence in Arlington County, and it is likely that the Nellie Custis School was built from local Brick Haven bricks. This is just one of the many stories about the everyday lives of people in the place now known as Aurora Highlands that shaped the area at the turn of the 20<sup>th</sup> Century that should be told via the preservation of the Nellie Custis School building, and it is strong evidence that more study is required about this structure before any decisions are made about demolition. What other history will a robust study reveal about this location and this school?

## History of Nellie Custis School – 750 S. 23<sup>rd</sup> Street

Henry C. Morris developed most of the Aurora Highlands area in the 1920's as a residential subdivision following the growth of Washington after World War I. The land for the Nellie Custis School was deeded to Arlington County at the time and the deed is stipulated for "School Purposes Only", and it has been used as a school or training facility since that time. **It is unclear if the site can even be used for any other purpose.** A letter was sent to Arlington County March 6, 2024 asking for the County's legal interpretation of the deed, but to date there has been no response.



Snip from 1921 Deed for Land at Nellie Custis School

Nellie Custis School is a contributing building to the Aurora Highlands Historic **District and the last**

**remaining historic building on the block.** The building is cited as architecturally distinctive and named as the only public example, and one of only three examples in total, of the Classical Revival Style on the 1996 Virginia Department of Historic Resources and Arlington County CPHD "First Phase of an Architectural Survey in Arlington County, Virginia" by Traceries, a Washington D. C. based historic preservation consultant.

[https://www.dhr.virginia.gov/pdf\\_files/SpecialCollections/AR-027\\_First\\_Phase\\_AH\\_Survey\\_Arlington\\_1996\\_Traceries\\_report.pdf](https://www.dhr.virginia.gov/pdf_files/SpecialCollections/AR-027_First_Phase_AH_Survey_Arlington_1996_Traceries_report.pdf)

From page 188,

The Classical Revival was based on the Neoclassical architecture of 18th century- France and England, Popular in America between the 1890s and 1950s, the fashion favored the French Neoclassical which provided a striking alternative to the ostentatious sculptural ornament associated with the Beaux Arts style. By contrast, the style was subdued and dignified, although, equally monumental in scale. Facades were markedly symmetrical and punctuated by rhythmic rows of columns, windows and entry doors.

From the National Register application regarding Educational Buildings in Aurora Highlands which was also compiled by Traceries:

*"Three public schools were originally constructed in Arlington County in the late nineteenth century to serve the Jefferson District, which included Aurora Highlands. The only extant public school by the 1920s was the Nelly Custis School at 750 23rd Street South. The building has ceased to function as a school and was rehabilitated to serve as a commercial building [for training purposes]. The school was named after Eleanor Parke "Nelly" Custis, the grandchild of Martha Custis Washington. Constructed in 1923, the two-story brick school building originally had a rectangular plan [enlarged at each end in 1931] that was further accentuated by a T-shaped addition.*

*Constructed of brick laid in five-course American-bond, the main block of this two-story building, although simplified, is classically inspired. A tripartite scheme is introduced through the use of brick, limestone, and fenestration. The brick bond at the base gives the impression of the rusticated raised basement commonly associated with Italian Renaissance palazzos. [The building also features wood molded bricks with a vertex texture at the base courses.]*

*Limited in ornamentation, the building has a central entry flanked by triple windows. The entry bay is identified by the stepped parapet that rises above the flat roof line. The large, evenly spaced windows at the second story create the effect of a piano nobile. A limestone belt course near the cornice introduces a third tier, what would commonly be associated with the capital of a classical building. The horizontal nature of the building is reinforced with the striations of the rustication, the two limestone belt courses, the rhythmic fenestration, and the line of the flat roof, with metal coping. The symmetry of this building is reinforced by a pavilion at either end of the composition, the symmetrical fenestration, and the slightly stepped parapet over the central bay."*

There is no other information in the application on the interior of the building. More research needs to be done to understand the interior construction materials and if it contains for example, old growth heartwood or other similar irreplaceable materials.

From the Stratford School Local Historic District webpage:

*The Stratford Junior High School reflects the advancement of the Civil Rights Movement in Arlington County, Virginia, in the Southern states, and in the nation at large. Following the landmark United States Supreme Court Case Brown v. Board of Education of Topeka (1954), government officials, citizen organizations, and other councils throughout the South vehemently opposed the desegregation of the public school system. Senator Harry F. Byrd of Virginia campaigned for “massive resistance” that urged a no compromise line against integration. Three African-American students attempted to integrate Stratford Junior High School in 1957, but all were refused admittance and sent to Hoffman-Boston. By means of continued litigation by the NAACP, on February 2, 1959, Stratford School was the first public school in the Commonwealth of Virginia to be desegregated. The successful integration represented the end of the Commonwealth’s policy of “massive resistance” and dealt a fatal blow to foes of school integration across the South.*

Despite the monumental achievement of the Stratford School desegregation, segregation continued in Virginia. The hardest fought and last battle of desegregation was in the integration of the elementary schools. History was made in Arlington, and Nellie Custis School played a vital role as it was one of several elementary schools that took black students from Drew Elementary completing integration. On August 10, 1971, only upon integration of the Arlington elementary schools, Arlington made history by becoming the first county in Virginia to comply with the Brown vs the Board of Education ruling. Full integration in Arlington was monumental as Virginia continued to lead the effort to resist integration. The first school to be integrated is hugely important of course, but desegregation was not achieved until each and every one of the county schools were integrated. Needless to say, integration of the Arlington County Schools not only shaped the lives of those involved, it re-directed the course of the country. This story is another one that needs more study and research and can be told through the preservation of Nellie Custis School.

A link to this research follows:

<https://library.arlingtonva.us/2018/01/11/the-desegregation-of-arlington-public-schools/#:~:text=Each%20January%2C%20the%20world%20remembers,Martin%20Luther%20King%2C%20Jr.&text=One%20of%20those%20places%20was,culminated%20on%20February%202%2C%201959>

What will more study about the role Nellie Custis School played in desegregation reveal?

With a change in demographics the school population declined in the 1970’s, and Nellie Custis School was closed. The County was interested in adaptively reusing the site as a library at that time, but ultimately traded the site at 750 23<sup>rd</sup> Street for other property owned by the Sheltered Occupational Center (SOC) in 1981. The SOC used the Nellie Custis School as a training facility. The SOC held a tree lighting ceremony on the giant evergreen tree in front of the property called “Miracle on 23<sup>rd</sup> Street” which has been central and popular annual event sponsored in part by the neighborhood for 50 years (according to Melwood’s website it has been 50 years). But the Study even proposes removing this giant evergreen tree.

The SOC merged with Linden Resources and eventually the property went to the Melwood Horticultural Training Center in 2018. At the time Melwood acquired the property it was known to be limited to Public Use, deeded “for school use only”, and Melwood only occupied under a Special Exception granted by the County Board. It was also known that the Aurora Highlands neighborhood was on the National Register of Historic Places, and the desire of the neighborhood was to preserve the Nellie Custis school building (documented in the Aurora Highlands 2008 Neighborhood Conservation Plan.)

Despite these known limitations on use when it acquired the property, Melwood now wants to change the land use designation to redevelop the site and demolish the existing building based on a recent, 2019, special exception policy that grants the County Board wide latitude in approving redevelopment 60' tall or more.

## Local Historic District Requirements per ACZO 11.3.4.A.4

The HALRB is charged with determining if Nellie Custis School **potentially** meets two of the eleven designation criteria in §11.3.4.A.6 of the Arlington County Zoning Ordinance (ACZO). However, Nellie Custis School meets at least eight of the eleven criteria, and pending more research, more than that. It is similar to, yet older than, Swanson Middle School which was designated as a Local Historic District in 2008 for historical significance, suitability for preservation or restoration, and educational value.

Nellie Custis School meets the following criteria from the Zoning Ordinance:

(a) The property is listed or is eligible for inclusion in the National Register of Historic Places;

YES: The school is a contributing building to the historic designation of the Aurora Highlands Neighborhood which is on the National Register of Historic Places.

(b) The property has character, interest, or value as part of the development, heritage, or cultural characteristics of the county, state, or nation;

YES: This is a public school that educated thousands of Arlingtonians for five decades. It was integral to the development of the Aurora Highlands neighborhood and played an important role in the integration of the Arlington County Schools.

(c) The property was the site of a significant local, state, or national event;

YES: Nellie Custis School was associated with the historic desegregation of the Virginia schools completing desegregation and making Arlington the first county in Virginia to comply with Brown vs the Board of Education.

(d) The property is associated with a person or persons who significantly contributed to the development of the county, state, or nation;

POSSIBLY: More research is required

(e) The property embodies distinguishing characteristics of an architectural style valuable for the study of a period, type, or method of construction;

YES: The scale of the building and the solid brick walls with detailed articulation around the openings are an excellent representation of the Classical Style public architecture of the early part of the 20<sup>th</sup> Century per the National Register of Historic Buildings.

(f) The property is identified as the work of a master builder, architect, or landscape architect;

POSSIBLY: More research is required.

(g) The property embodies elements of design, detailing, materials, or craftsmanship that render it structurally or architecturally significant;

YES: the building is classically inspired with clean ornamentation in its likely locally made brickwork.

(h) The property has a distinctive location, or singular physical characteristics that make it an established or familiar visual feature;

YES: The building is located on 23<sup>rd</sup> Street in a prominent location and it is well known as an established, historic part of the community as a school. It is also known as a polling place and the location of the annual tree lighting "Miracle on 23<sup>rd</sup> Street".

(i) The property is a particularly fine or unique example of a utilitarian structure representing a period or style in the commercial, industrial, or agricultural development of the county, with a high level of historic integrity or architectural significance;

YES: Nellie Custis School is an excellent example of the Classical Style. Further the structure and the brickwork of the original building is intact.

(j) The property has the potential to yield information important to the prehistory or history of the county, state, or nation; or

POSSIBLY: Nellie Custis School is built adjacent to an underground creek where there is the possibility of discovering pre-history. More study is needed to understand the history of the construction.

(k) The property is suitable for preservation or restoration.

YES: the property has been in continuous use and is in excellent condition and is suitable for preservation or restoration.

Since the property more than "potentially" meets more than two of the eleven requirements, there can be no conclusion other than to continue the Local Historic District request forward for study.

## Final Thoughts

Prior to the Melwood Special GLUP Study, there was no expectation that this school could have been conceived of as being demolished as the Land Use has remained “Public” until this time, there is a deed for “school use only” and it is a contributing building in the Aurora Highlands Historic District. However, Melwood is now seeking to undue the designated Public land use, which is of great concern to AHCA whose recommendation is first and foremost for the county to keep the Public land use and adaptively reuse the building as a library, as there are plans to replace the existing Aurora Hills Library and adjacent park with a much-needed elementary school. AHCA reiterated its desire to preserve the building in another vote on June 12, 2024 with nearly unanimous approval of the Local Historic District designation application.

The Nellie Custis School is a historic resource that cannot be replaced once it is gone, and so should be preserved. The Nellie Custis School must be preserved in situ and not as an interpretive brick or façade as was suggested in the study, because that is not preservation, that is demolition. Simply calling demolition “preservation” does not make it so.

The Local Historic District is intended to protect local historic buildings because they are irreplaceable and capture distinct authentic aspects of our history and architectural heritage. Nellie Custis School is a textbook example of an authentic community resource and historic building that is in need of protection and should therefore be designated as a Local Historic District.