



AURORA HIGHLANDS CIVIC ASSOCIATION

May 29, 2026

Subject: Nelly Custis School Local Historic District (LHD)

Dear Chair Bagley and Members of the Planning Commission,

The Aurora Highlands Civic Association (AHCA) voted nearly unanimously in June 2024 to support designation of the Nelly Custis School Local Historic District and continues to support the designation following the Historical Affairs and Landmark Review Board (HALRB) at its March 2026 meeting. The HALRB recommendation — preservation and restoration of the original school building and its 1932 additions — is consistent with the development envelope AHCA approved for the site in May 2024. See Appendix A. AHCA supports designation because:

- The property satisfies multiple criteria under ACZO Section 11.3;
- HALRB voted 7–4 to recommend designation after extensive review;
- The building remains a contributing resource within the Aurora Highlands Historic District;
- Preservation and adaptive reuse remain feasible;
- The current Board Report omits key facts and applies review criteria inconsistent with the ordinance.

Board Report Review

1. The Board Report Contains Omissions And Applies an Analytic Framework That Does Not Correspond to the Criteria Set forth in the Arlington County Zoning Ordinance

Like the February 27, 2026 Draft Study on which it relies, the Board Report omits important facts and applies an analytical framework inconsistent with the criteria set forth in the Arlington County Zoning Ordinance (ACZO). As written, the Report's conclusion that the building lacks sufficient historic architectural integrity to warrant a LHD designation is unsupported by the analysis provided and does not adequately address the applicable designation criteria.

Because of the procedural issues, omissions and analytical deficiencies identified in this letter and appendices, the Board Report, in its current form, should not be relied upon as the basis for the Planning Commission's decision. A revised Board Report addressing these issues is necessary to enable for the Planning Commission to make a fully informed determination regarding designation.

2. March 18, 2026 HALRB Meeting Minutes Not Posted

As of 7:00 a.m. on May 29, 2026, the meeting minutes for the March 18, 2026 HALRB meeting—during which the LHD was discussed—had not been posted. This denies the public an adequate opportunity for meaningful public review and participation. Notably, minutes from the April HALRB meetings were posted, making the absence of the March 18 minutes particularly concerning given the importance of timely public access to deliberative records during an active review process, and in an age where there are multiple tools available to help transcribe and summarize.

3. Late Posting of Agenda and Board Report

The Agenda and Board Report for the June 1, 2026 Planning Commission meeting were not posted until approximately 3 PM on May 28, 2026, nearly a full day less than the three business days before the meeting as required under Virginia open meeting requirements. This is particularly concerning given that the metadata for the Board Report indicates it was last modified at 3:32 PM on May 27, 2026, indicating it could have been posted in time to comply with posting requirements.

Because the relevant materials were posted less than 72 hours before the meeting, members of the public were denied a meaningful opportunity to review and respond to the proposal prior to Board action. Proceeding under these circumstances raises concerns regarding whether the public was afforded adequate time for meaningful review consistent with the spirit of Virginia FOIA and the Commonwealth's open government requirements.

In addition, notices at the site also appear to have been posted late. Neighbors report that the notices were not installed until late morning on May 28, 2026. Staff did not provide evidence that these were posted timely.

4. Use of Irrelevant Review Criteria

The Board Report improperly focuses on subjective arguments regarding “historic integrity” that are outside the scope of the LHD review criteria established in ACZO Section 11.3.

These same arguments were previously presented in the Draft Historic Designation Form and were already considered by the HALRB. At the March 18 HALRB meeting, Chair Kaydee Myers specifically clarified that broader debates over historic integrity were separate from the zoning review required under the ordinance. The current Board Report disregards that clarification and introduces arguments that are not relevant to the required LHD determination.

5. Historic Integrity

Despite staff assertions to the contrary, the Nelly Custis School clearly retains historic integrity. The original form and massing of the building remain intact. Later additions were attached in a manner that makes them readily distinguishable and removable. Replacement windows and doors were installed within the original masonry openings, which are common and accepted alterations in historic preservation practice.

The building remains structurally sound and in good condition, with the original brick detailing exceptionally well preserved. Importantly, County staff did not perform a detailed façade survey of the building, whereas AHCA did conduct such a survey. That survey demonstrates that the building is highly suitable for restoration and adaptive reuse.

See Appendix B:

- Attachment C – Façade Survey
- Attachment E – Case Studies and Examples of Adaptive Reuse

6. Definition of a Contributing Building in the Board Report

Each building within the Aurora Highlands Historic District was individually evaluated at the time of the Aurora Highlands Historic District National Register nomination in 2008. Buildings that retained sufficient historic integrity were classified as “contributing,” while those that did not were classified as “non-contributing.”

The National Register nomination form explicitly states:

“Additions and alterations, like the use of replacement materials, are common throughout Aurora Highlands. In general, these changes do not diminish the overall integrity of the historic district or the *integrity of most of the individual buildings*. When the additions substantially altered the original form, scale, and fenestration of the building, it is noted as non-contributing.”

Nelly Custis School was specifically identified as a contributing resource because it was determined to retain sufficient historic integrity to convey its significance. Staff discussion in the Board Report that it might not be contributing conflicts with the formal assessment contained in the National Register, which was also endorsed by the Virginia Department of Historic Resources and the Arlington County Manager (in the final section of National Register Form). The National Register Form can be found here:

<https://aurorahighlands.org/wp-content/uploads/08001018-1-2.pdf>

7. Property Owner Consent

The Zoning Ordinance does not require property owner support, or consent, as a criterion for LHD designation. This is intentional and reflects the longstanding principle that historic preservation decisions are made independently, in the public interest, even where private development interests may conflict with preservation goals.

There are numerous examples of LHDs in Arlington where some property owners opposed designation at the time, including the high-profile Maywood Historic District.

Further, Melwood is not a typical private property owner situation. When Melwood acquired the property, the site retained public institutional land use and there was no redevelopment potential requiring demolition of the historic structure. It was only after Arlington County approved or

signaled support for land use and zoning changes requested by Melwood that demolition became financially advantageous and preservation concerns became urgent prompting the LHD nomination.

8. 2025 Zoning Approval as an Obstacle to LHD Designation

The Board Report omits the February 3, 2025 letter from HALRB to the County Board addressing the conflict created by the County when advancing the GLUP and zoning amendments while the LHD review process was still ongoing. HALRB expressed concerns regarding the County's decision to proceed with upzoning before completion of the historic review process. See Appendix C.

The Board Report's assertion that designation "would undermine the extensive community engagement process undertaken by the GLUP study" is misleading given that most of the members of the surrounding community opposed the GLUP upzoning proposal for many reasons, including the demolition of Nelly Custis School. This was evidenced in the surveys conducted, the votes taken by AHCA, and letters submitted by the community at the time.

The Board Report's reliance on the prior zoning approval as justification for denying historic protections is inconsistent with the ongoing historic review process which has been asserted by County Board members as a separate, and should therefore be given no weight.

9. Staff Unilaterally Expanded the Scope of the LHD Beyond the Historic Resource

County staff unilaterally framed the proposal as requiring designation of the entire site, rather than focusing on the contributing portions of the school, as neither the applicant nor the local community requested that the entire property be designated as historic. The applicant's letter to HALRB on June 17, 2024 included a drawing focusing on preservation of only of the 1932 building which reflects the National Register nomination's standard of considering only buildings constructed prior to 1957 as contributing resources.

<https://aurorahighlands.org/wp-content/uploads/Nellie-Custis-LHD-Letter-to-HALRB-3.pdf>

While AHCA desires to retain the building as a school because the site was donated and deeded to the County "for school purposes only" and because there is severe overcrowding at Oakridge Elementary (children in trailers for a decade and thousands of housing units on the way, with the only option to bus across 395), it voted to approve a development envelope separate from the use of the site that retains the historic building and mature landscaping (Appendix A) and allows development of approximately 80,000 SF.

During the hearing, several HALRB members expressed interest in supporting designation of the historic portions of the school while allowing redevelopment on other portions of the site. However, staff presented the decision as effectively "all-or-nothing", which had the effect of discouraging consideration of a more balanced preservation approach and limiting discussion of partial designation alternatives. HALRB ultimately took two votes, the first rejecting the staff's

expansion of the LHD Scope, and a second approving nomination for the historic portion of the site.

HALRB Hearing Summary – March 18, 2026

At the opening of the March 18, 2026 HALRB hearing, Chair Kaydee Myers emphasized that the board’s responsibility was to evaluate the property against the eleven criteria listed in Section 11.3 of the Arlington County Zoning Ordinance. She clarified that the ordinance does not call for an assessment of historic integrity, but instead mandates evaluation of each property according to the specific criteria. See also Appendix B – Attachment D (AHCA evaluation of the 11 criteria).

The HALRB recommended approval of the LHD by a 7–4 vote, a majority that included support from all four former HALRB chairs now serving on the board, reflecting decades of institutional leadership and experience with Arlington’s preservation ordinance.

During deliberations, 10 of the 12 HALRB members agreed that the property clearly met at least two criteria under Section 11.3:

- **(a)** The property is listed on the National Register of Historic Places; and
- **(k)** The property is suitable for preservation or restoration.

While there was no formal tally for each criterion, most of the members supporting designation stated in the discussion and in straw polls they agreed that:

- **(b)** As a school, the property holds value in the context of Arlington County’s educational and community development history.
- **(f)** The building is an early work of notable architects Upman and Adams; and
- **(h)** The building serves as an established and familiar visual feature along 23rd Street South and remains prominent within the neighborhood.

Historic schools of this era — particularly those associated with the development of the jurisdiction itself — are often considered strong candidates for preservation because of their civic and community significance.

Nelly Custis School is not a grand estate; it is a civic building reflecting the lived history of Arlington residents. Generations of children attended school here, and it remains the only surviving civic resource in Aurora Highlands. Comparable neighborhood landmarks—including the original firehouse, library, trolley infrastructure, brick warehouses, Luna Park, and nearby Queen City—have been lost.

Preservation of Nelly Custis School is crucial both to maintain community identity and to prevent setting a precedent for demolition of other historic schools, not the least of which is the Langston Arts Center in North Arlington.

Melwood Development Context and Feasibility of Preservation

Historic preservation decisions are frequently made under development pressure with claims that demolition is unavoidable. However, the record demonstrates that preservation and adaptive reuse were actively considered by Melwood / its development partner Wesley Housing, and remain feasible.

Documents obtained through a FOIA request include a January 8, 2024 email from Wesley Housing to Virginia Housing (the administrator of affordable housing funding), stating:

“The outcome of the GLUP study described above will inform whether the building is renovated/expanded or torn down for new construction. *As such, I’ve included building massing for both scenarios under ‘site plans’ attachments.*”

See Appendix B – Attachment G for an image of the email.

This correspondence confirms there were two scenarios, including a preservation scenario that was actively contemplated and studied, demonstrating the feasibility of adaptive reuse.

Moreover, the project has evolved into a more conventional affordable housing proposal than initially presented. While the initial proposal emphasized that Melwood is providing unique disability-focused housing as justification for demolition, the approved site plan required only limited amount of 60-day marketing for four units to disabled residents, with no special programming requirements either in the site plan or in its application to Virginia Housing.

Site plan conditions are available here:

<https://www.arlingtonva.us/Government/Projects/Project-Types/Site-Plan/Melwood>

Virginia Housing 2025 9% Application obtained via FOIA is available here (note: the application is bifurcated for financing reasons. This application is one of two mirror applications):

https://aurorahighlands.org/wp-content/uploads/Copy-of-Wesley-Melwood-9-%E2%80%93-Reservation-App_DRAFT_3.12.25-3.xlsx

Community and Organizational Support

HALRB’s recommendation aligns with longstanding preservation expertise and community input. Over 56 letters have been submitted to HALRB and the County Board supporting designation, representing:

- Longtime and newer residents of Aurora Highlands
- Civic Associations: Lyon Park, Lyon Village, Shirlington, Glen Carlyn, Leeway Overlee, Aurora Highlands
- Arlington Civic Federation, Arlington Tree Connection, Save Historic Arlington
- Louis Pappas Trust (owners of numerous historic properties along 23rd Street)
- Mr. Ted Saks, prior Planning Commission Chair

Additionally, over 270 signatures were collected on a public petition at Change.org advocating to “Save Nelly Custis School from Demolition.”

These supporters represent a broad coalition of Arlington residents and organizations. Because establishment and community familiarity of the building are factors to be considered under the zoning ordinance, while property owner support is not, the input of the local community should be given significant weight in the LHD review, as HALRB did.

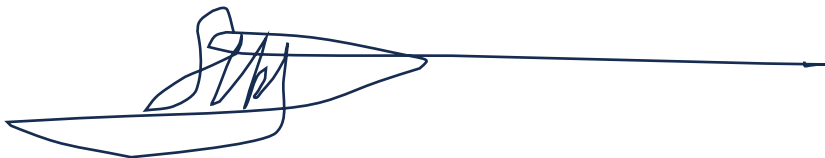
Summary

Nelly Custis School is historic, notable, and restorable. In neighboring communities, this property would be considered a textbook opportunity for adaptive reuse: preserving a historic civic structure while allowing compatible new development that respects the surrounding neighborhood and adjacent parkland.

The AHCA and HALRB recommendations from 2024 continue to provide a clear pathway for achieving both preservation and development objectives. HALRB has a long history of rigorously and judiciously protecting Arlington’s historic resources, and its members voted in favor of the Local Historic District after thorough review. Overriding the judgment of this expert body—particularly when it includes four former HALRB chairs—would be rare, if not unprecedented, and a minimum highly unusual given HALRB’s role and expertise in preservation matters.

AHCA respectfully urges the Planning Commission to recommend approval of the Nelly Custis School Local Historic District, ensuring both preservation of Arlington’s heritage and continued community benefit for current and future residents.

Regards,

A handwritten signature in blue ink, appearing to read "Stacy Meyer", is written over a horizontal line that extends to the right. The signature is stylized and somewhat abstract.

Stacy Meyer, RA, LEED AP
President, Aurora Highlands Civic Association

Appendix A: AHCA Site Plan “Alternative Envelope”

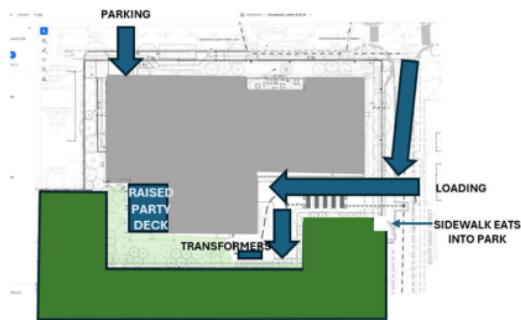
Appendix B: AHCA Letter to HALRB March 17, 2026

Appendix C: Letter from HALRB to the County Board February 3, 2025

CC: Arlington County Board
HALRB
Arlington Civic Federation
Aurora Highlands Civic Association Board

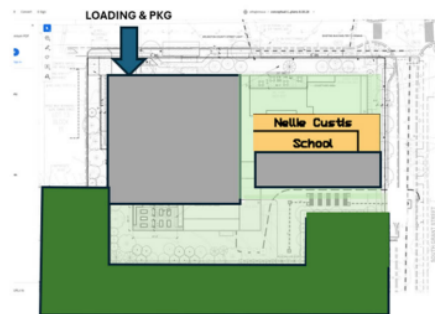
Appendix A: AHCA Site Plan “Alternative Envelope” May, 2024

As Proposed by Melwood 154K SF



- Demo historic school
- Remove 10+ mature trees
- Loading dock by park, consume Grant St. parking
- Min. separation from park, not enough room for tree canopy with loading + transformer field
- 60 -70' + penthouse High-Med density
- 17% tree canopy excluding park
- Inadequate parking - overflow
- Unscreened raised party deck facing residential neighborhood & park
- Expands sidewalk into park in NE corner

AHCA Alternative Envelope – half the size, ~80K SF max



- Adaptive reuse of the Nellie Custis School
- Retain mature trees per GLUP Study
- Parking entry and loading off of 23rd Street
- Heavy separation from park – allows for tree canopy
- 35' tall – actually Low- Med density
- 25%+ tree canopy excluding park – allows for open space, native / pollinator plantings
- Adequate parking on-site / below
- Solar roof potential

Note: subsequent changes from this 2024 Melwood design include:

- 1) Per the County Requirement Melwood did not expand the sidewalk in to Nelly Custis Park.
- 2) Melwood increased the width of Grant Street for truck turning

Appendix B : AHCA March 17, 2026 Letter to HALRB



AURORA HIGHLANDS CIVIC ASSOCIATION

March 17, 2026

Re: Nellie Custis School Historic District Designation Form Report

Dear Members of the Historic and Landmark Review Board,

I write regarding the Nellie Custis School Historic District Designation Form (the Report). While the Report contains useful historical information, it omits several important facts and applies an analytical framework that does not correspond to the criteria set forth in the Arlington County Zoning Ordinance (ACZO). As written, the Report's conclusion that the building lacks sufficient historic architectural integrity to warrant a historic district designation is unsupported by the analysis provided and does not adequately address the applicable designation criteria.

The issues described below should be addressed before the Report is relied upon by the Board in considering whether the property merits designation.

Failure to Apply the Zoning Ordinance Criteria

The ACZO establishes specific criteria for designation of a Local Historic District. These criteria provide the framework within which the Board is required to evaluate properties proposed for designation. The Report does not clearly evaluate the Nellie Custis Elementary School building against those criteria.

Instead, the Report relies heavily on a generalized assertion that the building's historic architectural integrity is "compromised." While integrity is an important concept within preservation practice, the ordinance requires the Board to determine whether a property satisfies the specific designation criteria established by the County. A conclusion based primarily on an undefined threshold of "compromised integrity," without a structured evaluation of the applicable criteria, substitutes a subjective assessment for the standards set forth in the ordinance.

The Report does not meaningfully analyze the criteria identified in ACZO §11.3.4.A.6. These provisions address properties that embody distinctive architectural characteristics or that possess significance in the historical development of the community. The Report acknowledges that the building has historical significance, yet it does not clearly analyze how the building's existing architectural features and historic associations relate to the criteria established in the ordinance.

A designation report intended to guide the Board's decision should present a clear and systematic evaluation of the property under the applicable criteria. The Report does not provide that analysis.

Omission of Relevant Historical and Community Context

The Report also omits several facts that are relevant to the Board's consideration of the nomination.

First, the Report does not acknowledge the vote of the Aurora Highlands Civic Association supporting designation of the building in 2024 and opposition to the Melwood proposal to demolish the building in 2022. Those votes reflect a substantial level of community recognition of the Aurora Highlands Historic District and the building's historical importance and demonstrates that preservation of the structure is a matter of significant concern within the neighborhood.

Second, the Report does not address the Comprehensive Plan, or the Aurora Highlands Neighborhood Conservation Plan, both of which emphasize the importance of preserving historic resources within the community. These adopted planning documents provide important context for evaluating whether protection of historically significant structures is consistent with broader planning objectives for the neighborhood.

Third, the Report does not adequately acknowledge that the building is already recognized as a contributing structure within the Aurora Highlands National Register Historic District See (Attachment A) or the impact to the Historic District that failure to approve the Local Historic District will have (See Attachment B.) The National Register designation reflects a prior determination that the building contributes to the historical significance and character of the district, and that contribution means it has sufficient architectural historic integrity. Having sufficient architectural historic integrity is the very definition of a contributing building.

Fourth, the Report does not adequately acknowledge this building is the last remaining public building in Aurora Highlands, and it does not acknowledge how many historic buildings have been demolished in an area that was rich not just with American history, but rich with the experience of the working-class people – the Alexandria Canal, Queen City, the Luna Park, Jackson City, the brick warehouses, etc. It does not acknowledge this building was deeded to the county by Mr. Morris, for school purposes only, as part of the Aurora Hill's subdivision as a community benefit.

The Report even goes so far to state there are “better examples” of Percy Adams work in other locations in North Arlington. But how is it equitable that historic assets in North Arlington can be considered worth preserving, but assets in this portion of South Arlington are worthless?

By omitting these points, the Report fails to present a complete picture of the historical, planning, and community context within which the Board's decision must be made.

Mischaracterization of the Building's Historic Integrity

The Report's conclusion that the building's integrity is “compromised” is not supported by the analysis presented. Historic school buildings commonly evolved over time through additions reflecting changing educational needs and expanding student populations. Within preservation practice, such additions are typically understood as part of a building's historic evolution rather than as evidence that the building has lost its integrity. Where the original building massing, architectural features, and historic setting remain clearly identifiable—as they do here—later expansions do not negate the ability of the building to convey its historical and architectural significance.

The Nellie Custis Elementary School building continues to retain substantial authentic historic fabric. Key architectural elements remain visible, and the building continues to occupy its historic location within the neighborhood it was originally constructed to serve. The relationship between the building, its site, and the surrounding community remains intact.

The Report states that the building retains integrity of “location, setting, and feeling,” yet it nonetheless concludes that the building’s integrity is “compromised.” The report does not explain why the architectural features that remain—including the building’s massing, form, and recognizable historic components—are insufficient to convey the building’s historical significance. Nor does the Report clearly identify which alterations are so substantial as to negate that significance.

Without such analysis, the conclusion that the building lacks sufficient integrity is unsupported by the discussion presented in the Report.

Incorrect Information in the Draft Report

The Report makes statements that the windows have been relocated. The new windows on the primary facades are replaced within the existing masonry sides and sill. Only one new window was added on the secondary Grant Street facade. Fixture (window, door, canopy etc.) replacement is considered a minor change that can be easily restored. Even a ChatGPT analysis of the building condition against the Arlington County guidance for Local Historic Districts and past practice reveals that based on the condition of the building, it has enough integrity to be a Local Historic District, See Attachment C.

The Report also states that the building has not been used consistently as a public-school, but fails to acknowledge it has been required to be use consistently as a school. Because of the restriction in the original deed, “for school purposes only”, the building has been used as a school until today, and so has had a continuity of school use. The current use, the Melwood Horticultural Training Center, is a school / educational use, just not a public-school use, as that school was closed by the County. So, the statement it has not been consistently used as a public school, when it was used as a school, is misleading. There has been a continuity of use.

Internal Inconsistency in the Draft Report

The Report also contains an internal inconsistency that should be addressed.

The Report acknowledges that the building retains historical significance and continues to contribute to the Aurora Highlands National Register Historic District. At the same time, however, the Report concludes that the building lacks sufficient integrity to warrant local historic designation.

These two conclusions are difficult to reconcile. A building that retains the historical significance necessary to contribute to a National Register district necessarily retains the ability to convey that significance. A determination that such a building nonetheless lacks sufficient integrity for local protection requires careful and clearly supported analysis. The Report does not provide that analysis.

Need for a Complete and Careful Evaluation

The Board’s decision regarding designation carries significant consequences for the long-term preservation of this historic structure.

Once a historically significant public building is demolished, the opportunity for preservation is permanently lost. For this reason, it is essential that the evaluation of the property’s eligibility for designation be thorough, accurate, and clearly grounded in the criteria established by the ordinance.

Where a building demonstrably possesses historical significance and retains the ability to convey that significance—as this building does—the prudent course is to ensure that the evaluation of its eligibility for designation is complete and supported by a transparent application of the governing standards, and to rely on the side of caution, and preserve it. A recommendation based on this incomplete and unsupported analysis risks foreclosing that opportunity prematurely. See Attachment D and Attachment E.

Alternate Options for Development

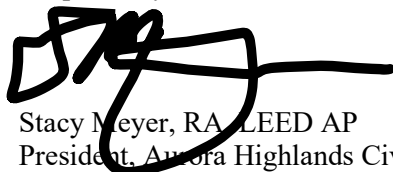
The Report does not include alternate options for development. There are much better options for development of the site than the Density Only approach taken by Melwood, and that do not require the demolition of Nellie Custis School. The Aurora Highlands Civic Association approved an “Alternative Envelope” (See Attachment F) that allows for around 60-80K square feet, while retaining the historic building, and respecting the height / scale of the historic district as indicated in our letter to HALRB June 17, 2024. Per a FOIA request to Virginia Housing, an email was obtained that shows even the developer submitted a plan to Virginia Housing to develop the site with the building in place, so clearly it is feasible to do so (See Attachment G).

Conclusion

For the reasons described above, the Report should be revised to address the applicable zoning ordinance criteria, incorporate the relevant historical and community context, and provide a more complete and clearly supported evaluation of the building’s integrity and significance and confirm that demolition is not the only option or the preferred option for development.

Because of the omissions and analytical deficiencies identified in this letter, the Report, in its current form, should not be relied upon as the basis for the Board’s decision. A revised Report addressing these issues is necessary in order for the Board to make a fully informed determination regarding designation.

Respectfully,



Stacy Meyer, RA, LEED AP
President, Aurora Highlands Civic Association

CC: Arlington County Board
Aurora Highlands Civic Association Board

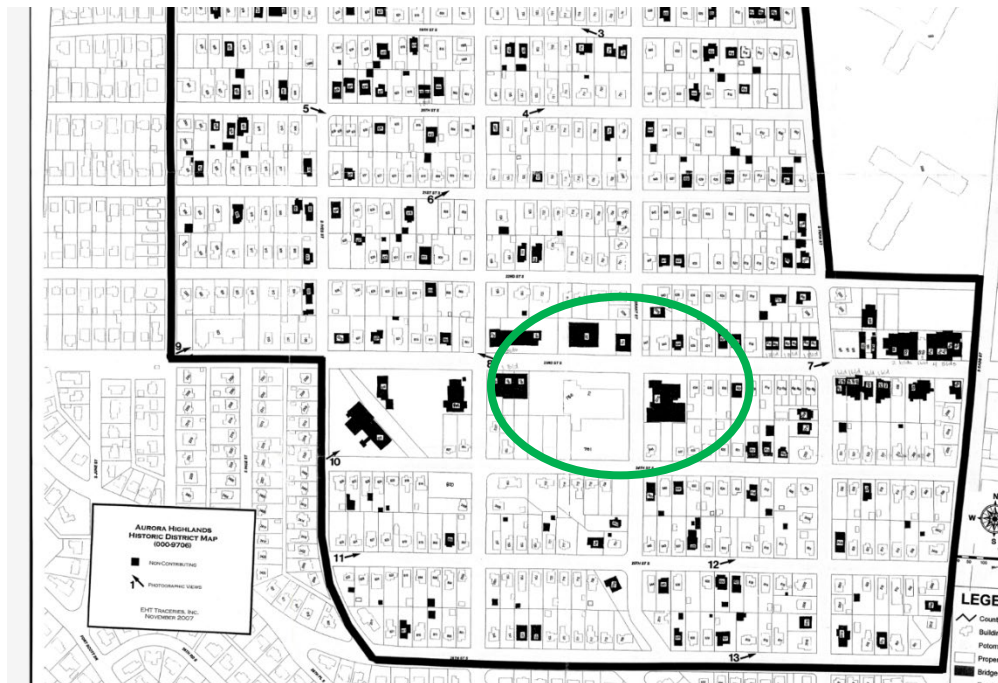
Attachments:

- Attachment A: Excerpts from the National Register of Historic Places
- Attachment B: Impact of Faith In Housing Legislation to Aurora Highlands Historic District
- Attachment C: Nellie Custis School Façade Survey
- Attachment D: Local Historic District Scorecard per ACZO 11.3.4.A.6
- Attachment E: Selected Case Studies Adaptive Reuse and Restoration
- Attachment F: Aurora Highlands Civic Association Proposed Envelope
- Attachment G: Developer Email Indicating Feasibility of Retaining Nellie Custis School

Attachment A: Excerpts from the National Register of Historic Places

Map of Contributing and Non-Contributing Buildings to the Aurora Highlands Historic District. Nelly Custis School is a contributing building, while the adjacent Calvary Church is not a contributing building due to its lack of historic integrity. Definition of Contributing Building from the Virginia DHR website. “sufficiently well preserved to convey historical significance”

Section 7 Page 55



Individual Resource Status: Commercial Building

Non-Contributing

Total: 1

712-750 23rd Street South 000-1133

Other DHR Id #: 000-9706-0424

Primary Resource Information: School, Stories 2.00, Style: Classical Revival, ca 1923

Individual Resource Status: School

Contributing

Total: 1

Contributing vs Non-contributing Definitions

- *Contributing* buildings, structures and sites existed during the district’s historic period and are sufficiently well preserved to convey historic significance.
- *Non-contributing* buildings and structures typically were constructed after the district’s historic period, or have been modified too much to convey historic significance. Resources that are less than 50 years old are typically considered non-contributing. In some cases, non-contributing resources can later be made contributing through restoration, or removal of modern substitute materials that obscure historic-character-defining materials or features.

Attachment B – Impact of Faith In Housing Legislation to Aurora Highlands Historic District

The purpose of the Historic District overlay in the zoning code per 11.3.1:

- A. Promote local historic preservation efforts through the identification and protection of historic resources throughout the county, and through the designation of local historic districts;*
- B. Assure that, within Arlington County's historic districts, new structures, buildings, additions, landscaping and related elements will be in harmony with their setting and environs;*
- C. Promote an enhanced quality of life within the county.*
- D. Maintain and improve property values by providing incentives for the upkeep, rehabilitation and restoration of older structures and buildings in a safe and healthful manner, and by encouraging desirable uses and forms of development that will lead to the continuance, conservation and improvement of the county's historic, cultural and architectural resources and institutions within their setting.*

The Historic District overlay at Nellie Custis School will not only provide protection of the Nellie Custis School building, but will also protect the integrity of the Aurora Highlands Historic District (#08001018) as per 11.3.1.A – D noted above. Demolition of the building will allow an inappropriately sized 60 ft tall building to be built on 23rd Street, which will in turn, given the recent “Faith in Housing” legislation, allow every church on 23rd Street to do the same creating a canyon of 5-over-1 stick built apartments totally changing the historic character, not to mention the other impacts of inappropriate density. This issue is omitted in the Study.

AURORA HIGHLANDS CIVIC ASSOCIATION

POTENTIAL DEVELOPMENT RESULTING FROM FAITH IN HOUSING ON 23rd STREET S



Melwood is approved for ~60 units / acre, 105 units

IN 500 ft COPYCAT RADIUS OF MELWOOD:

Calvary owns several properties totaling ~ 67K SF, 1.6 acres > copycat potential 92 units
Latter Day Saints buildings total ~48K SF, 1.1 acres > 66 units
Our Lady of Lourdes (including the Arlington underground stream) totals ~140K SF, 3.2 acres > 193 units

Mt. Vernon is in the 500 ft copycat radius of Our Lady of Lourdes. Once OLOL is built out Mt. Vernon can copycat its ~27K SF, .6 acres > 38 units

Potential exceeds 500 units!!!*

*figures from Arlington County land records - potential based on legislation.

Attachment C: Nellie Custis School Façade Survey

The Report omits a survey of the existing building material. The existing historic building is in excellent shape, suitable for restoration, which is a complete, 180-degree departure from the description contained in the Report. The Report includes few photographs of the original building material.

- a. 23rd Street Main Façade: the exterior walls, masonry and trim are preserved completely / nearly completely on the front. Only windows, doors and the front canopy have been replaced – but importantly *these were replaced within the existing original masonry openings*.
- b. Grant Street Main Façade: the second primary façade is in the same condition as the 23rd Street Main Facade, with one new window cut in.
- c. West Non-Street Facing Façade: The 2nd Floor of the West Façade is in the same condition as the 23rd Street Façade. The 1st Floor wall remains behind a one-story addition. The original masonry wall appears to have been parged or drywalled over inside the addition, either of which could be easily removed. The addition generally is “tacked onto” the original building, allowing easy removal and reversion to the original form.
- d. South Non-Street Facing Façade: this is the back of the building. The original roof line and trim and masonry wall is preserved at the 2nd Floor except it appears windows have been bricked in, though the original sill remains. There is a first-floor addition similar to the West Façade. The original masonry wall appears to have been parged or drywalled over inside the addition, either which could be easily removed. The addition is generally “tacked onto” the original building, allowing easy removal and reversion to the original form.

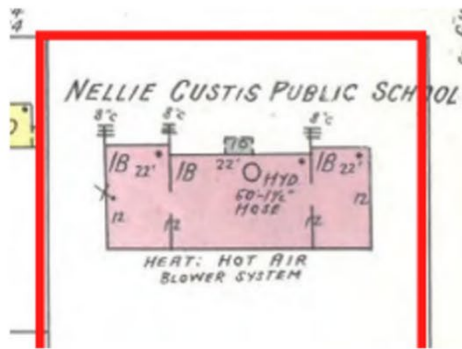
“Compromised integrity” is not even a standard for the Local Historic District. The standard for building condition is clear in 11.3.4.A6(k) “The property is suitable for preservation or restoration”. Preservation and Restoration are technical terms defined in the Secretary of Interior Guidelines and Nellie Custis School is a textbook example of a building that is suitable for “restoration” treatment.

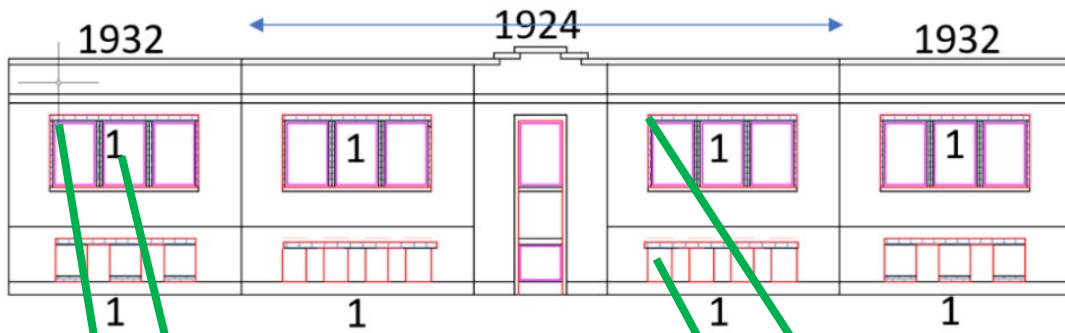
<https://www.nps.gov/articles/000/treatment-standards-restoration.htm#:~:text=Restoration%20is%20the%20treatment%20that,most%20significant%E2%80%944time%20in%20its%20history.>

Nellie Custis School Exterior Façade Survey

750 S. 23rd Street S., Arlington, Virginia

Stacy Meyer, RA, LEED AP
3/3/2026





Sketch of Existing 23rd Street Façade, 3/3/2026

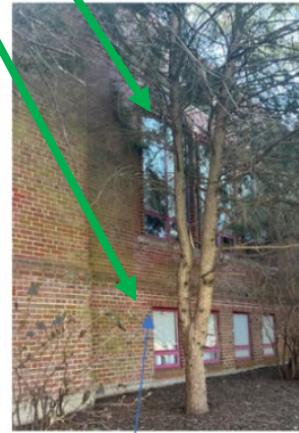
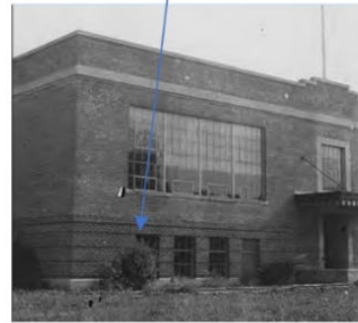


Figure 30: Nelly Custis Elementary School in 1932 after the 1931 expansion. Source: Fire Insurance Survey, 1932, RG 32-7-8-1, Central Library of Arlington County.

1932



1924

NORTH ELEVATION – 23rd STREET

MASONRY & WINDOWS

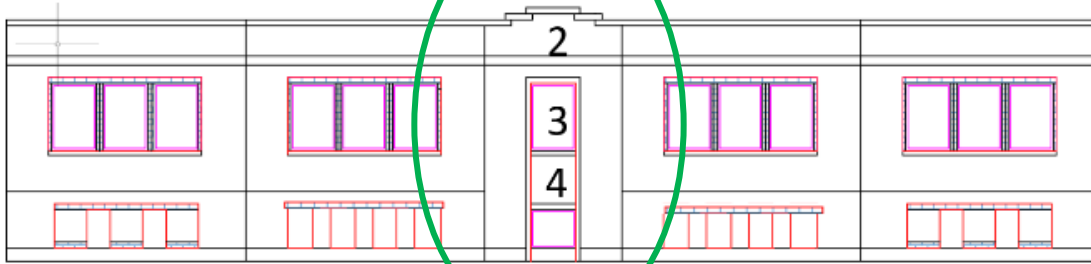
General: original masonry and limestone trim completely in tact and in excellent condition

NOTES

1) Windows all infilled within original masonry openings except header. Original side brickwork and sills in tact.



New sill was built within the original opening & new window installed within the original opening (typical)



1924

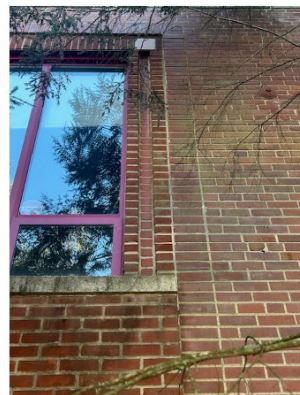


4) Entry canopy missing, limestone trim missing at center portico, and front steps / doors replaced – **new work is inset within the original masonry opening**

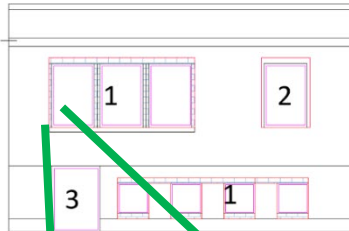


CENTER ENTRY DETAILS

2) Decorative stone top course appears in tact and protected by coping



3) Original brick header & sides surrounds the infill brick header in the center entry opening. Replacement of the window, trim and canopy is standard



Sketch of Existing Grant Street Façade, 3/3/2026



Figure 30: Nelly Custis Elementary School Insurance Survey, 1932, RG 32-7-8-1, Ce

1932

EAST ELEVATION – GRANT STREET

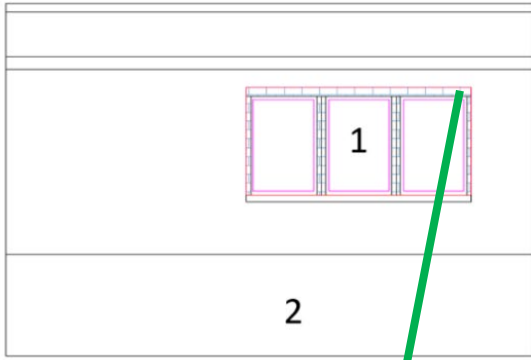
MASONRY & WINDOWS

General: original masonry and limestone trim completely in tact and in excellent condition

NOTES

- 1) Windows all infilled within original masonry openings except header. Original side brickwork and sills in tact.
- 2) New window cut in
- 3) New door in original door location. Original canopy missing





Sketch of Existing West Façade, 3/3/2026



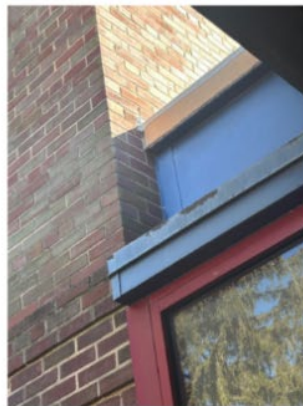
WEST ELEVATION

MASONRY & WINDOWS

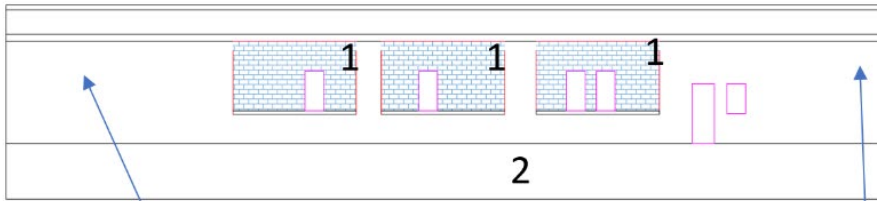
General: original masonry and limestone trim completely in tact and in excellent condition

NOTES

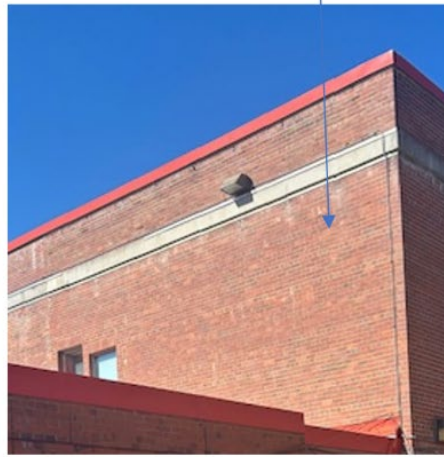
- 1) Windows all infilled within original masonry openings except header. Original side brickwork and sills in tact.
- 2) Later addition butted to to the existing wall – and appears to not be cut in allowing it to be detached without damage.
- 3) Historic brick wall at addition interior appears to be in tact and parged / drywall furring. Either should be able to be easily removed for restoration / preservation.



2) Detail of addition meeting 1932 exterior wall. New materials butt into the wall with a caulk joint, allowing easy removal and preservation / restoration of the original wall.



Sketch of Existing South Façade, 3/3/2026



SOUTH / REAR ELEVATION

MASONRY & WINDOWS

General: original masonry and limestone trim completely in tact and in excellent condition

- 1) It appears 2 - 3 windows were infilled with brick. The original sills remain.
- 2) Later addition attached to the existing wall – and appears to butt to the existing wall allowing it to be detached without damage.
- 3) Historic brick wall at addition interior appears to be in tact and parged / drywall furring. Either should be able to be easily removed for restoration / preservation



2) The brick in the addition is for the most part cut around / butted to the original brick and limestone trim, making the addition removable for restoration / preservation.

Chat GPT assessment of “integrity” based on Arlington County staff manual criteria:

Aspect	Assessment	Notes
Location	✔ High	Building is in its original location; no relocation.
Design	⚠ Moderate	Large additions affect rooflines and massing, but only on non-primary facades. Original 1923 and 1934 proportions largely intact, especially on primary/public facades.
Materials	⚠ Moderate	Original brick largely intact; many windows and doors replaced; some trim replaced.
Workmanship	⚠ Moderate	Decorative features and construction details remain visible, except at doors and windows which were replaced.
Feeling	⚠ Moderate	Still clearly recognizable as an early 20th-century school; alterations reduce aesthetic but are removable.
Association	⚠ Moderate	Original educational function is clear.
Setting	✔ High-Moderate	Neighborhood context largely intact; streetscape contributes positively; minor modern intrusions exist.

How It Compares

Rating	Meaning
✔ High	Integrity is largely intact; few or no changes; building clearly conveys historic character.
⚠ Moderate	Some alterations exist; original features partly compromised; historic character still readable, especially from primary views.
⚠ Moderate-Low	Alterations significantly affect design, materials, or workmanship; some features may be obscured; integrity weakened.
✘ Low	Original features mostly lost; historic character not easily discernible; building may not meet LHD requirements.

Meaning of “Moderate”

- The building **retains most of its historic character**, but there are **noticeable alterations, replacements, or additions**.
- Some original features are **partially obscured, altered, or replaced**, but the property **still conveys its historic character**, especially in public-facing areas.
- Often indicates that **issues are reversible**, so preservation or LHD designation is feasible with minimal intervention.

Attachment D - Local Historic District Scorecard per ACZO 11.3.4.A.6

The HALRB is charged with determining if Nellie Custis School 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 with no doubt six of the eleven criteria, and possibly more than that and is a textbook example of a property that needs protection in the form of the local historic district.

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 100%: 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 100%: This is a public school that educated thousands of Arlingtonians for five decades. It represents a turning point in school design from the prior one-classroom buildings to multi-classroom to accommodate the increasing need for public education. It was integral to the development of the Aurora Highlands neighborhood and played an important role in the integration of the Arlington County Schools, Per the deed it has been required to be a school use and has served continuously as a school use since 1923.

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

POSSIBLY: 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 contribute to the development of the county, state, or nation;

POSSIBLY: unknown.

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

YES 100%: 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 20th Century per the National Register of Historic Buildings. It is the last remaining public building of the era in Aurora Highlands.

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

YES 100%: The architect is Percy Adams a notable architect who designed the earliest modern schools and went on to design the Longworth House Office Building and the Rixey Mansion.

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

POSSIBLY: 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 100%: The building is located on 23rd 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 23rd 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;

POSSIBLY: 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. See next page.

YES 100%

SUMMARY

YES - 100% - NO DOUBT: 6 CRITERIA

POSSIBLY: 5 CRITERIA

The building is suitable for restoration per the Secretary of Interior standards for Restoration

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period....The Restoration Standards allow for the depiction of a building at a particular time in its history by preserving materials, features, finishes, and spaces from its period of significance and removing those from other periods.

<https://www.nps.gov/articles/000/treatment-standards-restoration.htm>

Restoration is the treatment that should be followed when the expressed goal of the project is to make the building appear as it did at a particular—and at its most significant—time in its history. The guidance provided by the [Standards for Restoration and Guidelines for Restoring Historic Buildings](#) is to first identify the materials and features from the restoration period. After these materials and features have been identified, they should be maintained, protected, repaired, and replaced, when necessary. Unlike the other treatments in which most, if not all, of the historic elements are retained, restoration will likely include the removal of features from other periods. Missing features from the restoration period should be replaced, based on physical or historic documentation, with either the same or compatible substitute materials. Only those designs that can be documented as having been built should be recreated in a restoration project.

The property has been in continuous use and is in excellent condition and is suitable for restoration. Most importantly: **the building has not been changed since the listing as a contributing building to the Aurora Highlands National Register of Historic Places in 2008 – if it were not suitable for restoration it would not have been included as a contributing building at that time.** The walls are in excellent condition, with only the fixtures needing replacement on the primary north and east facades, and the second story of the west façade.

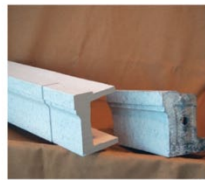
Attachment E - Selected Case Studies Adaptive Reuse & Restoration

1. Selected examples of Restoration from the NPS.
2. The Langston Slater Schools in DC. The condition of these schools is significantly worse than Nellie Custis as they have some structural damage in addition to fixture replacement. The schools are being planned to be **restored, adaptively reused as affordable housing. This is a model project as to what the county should require at Nellie Custis School.**
3. The Condominiums at Terrell Place. The condition of these **buildings was in markedly worse shape than Nellie Custis School – the entire copper first floor storefront required replacement,** a non-historic building removed, windows, parging, brickwork, roof, etc. were replaced including structural elements. These buildings had significantly less historic material, and were less well known than Nellie Custis. And yet, the project won an award for used of historic resources from the AIA when **restored.**
4. The adaptive reuse of Garfinkel's department store – the building was in good shape, **but windows, doors, entry and notable a canopy were replaced, similar to Nellie Custis.**

Notably, none of these examples are in Arlington, which chooses to demolish historic buildings despite being in the bullseye of all of America's history, here in Aurora Highlands. Items 2 -4 were projects I managed, if there are additional questions.

National Park Service Examples of Restoration Treatment

[4] (a) Over the years terra-cotta cladding had been replaced on the lower floors of this early 20th century bank building with a storefront and incompatible windows. (b) A 1936 photograph of the building provided the documentation to restore its historic appearance. (c) Glass fiber reinforced plastic (GFRP) was chosen as a substitute material, and samples were made in a variety of colors and textures to obtain the best match for the missing and damaged terra cotta. (d) This photo taken after restoration shows that the GFRP replacements successfully blend in with the original terra cotta. Photo (d): Blamonet at English Wikipedia.



The first floor of this building needed significant restoration – the original arched masonry openings were rebuilt.



[1] (a) When it was acquired by the National Trust for Historic Preservation in the 1980s, Montpelier in Montpelier Station, VA, the home of James and Dolley Madison, had been much altered and enlarged since it was first constructed. Based on historical documentation and research, Montpelier was accurately restored to its 1820s appearance when the president and his wife lived there (b). Photos: Courtesy of The Montpelier Foundation.



The wings of Montpelier were reduced from two stories to one story in this large restoration.

The Langston Slater School
33 – 45 P Street, NW Washington DC
Deputy Mayor Planning & Economic Development, Washington DC
Adaptive Reuse / Affordable Housing 2020 - ongoing

ADAPTIVE REUSE & RESTORATION

Disposition of **the Langston Slater Schools for adaptive reuse for affordable housing**. The buildings need a significant amount of work which will be funded by Historic Preservation Tax Credits. The plan is to do adaptive reuse of the school buildings for affordable apartments and infill between them with a new small building (same height) for affordable condominiums.

The windows, roof, canopies and entry bases will require replacement, and the façade, repair. Listed on the National Register of Historic Places, 2013.



**The Condominiums at Terrell Place, 675 E Street, NW, Washington, DC
CarrAmerica Development, Inc.**

Adaptive Reuse / Condominium, 60K Square Feet, 2001 – 2004

“2004 Excellence in Construction Award” from the Metro Washington and Virginia Chapters of Associated Builders and Contractors.

“2004 Award of Merit for Historic Resources” from the Washington, DC, AIA

ADAPTIVE REUSE & RESTORATION

Adaptive reuse of bank / retail buildings for a condominium in downtown Washington, DC. The existing site contained three structures whose historic fabric had to be maintained intact. A fourth building, a connecting building, which was not historic was demolished. Two of the historic structures were typical brownstone / brick row houses dating from the late 19th Century. The third structure was an historic bank building, dating from the mid-19th Century and had a cast iron and stucco façade. The bank building was attached to the row houses via a new connecting lobby finished in maple and travertine, with a custom curtain wall elevator tower. In the Downtown Historic District.

Architect: Smith Group with Historic Preservation Mary Oehrlein

All windows were replaced; the first-floor copper canopy was rebuilt. The façades all required major repair and parging.



**Hamilton Square,
600 14th Street, NW, Washington DC
CarrAmerica Development, Inc.**

Adaptive Reuse / Office, 250K Square Feet, 1998 – 2000

“Renovation of the Year, 1999” Greater Washington Association of Realtors

“Renovation of the Year, 1998” Washington Business Journal

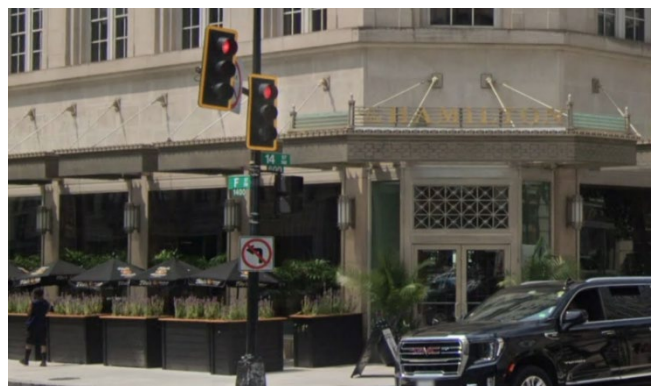
ADAPTIVE REUSE & RESTORATION

Adaptive reuse of retail and reuse as a trophy office building in downtown, Washington, DC, one block from the White House.

The existing building previously housed Garfinkle’s department store. The masonry façade and first bay of structure were kept in-tact, but the core of the building was rebuilt. In the Financial Historic District.

Architect: SOM

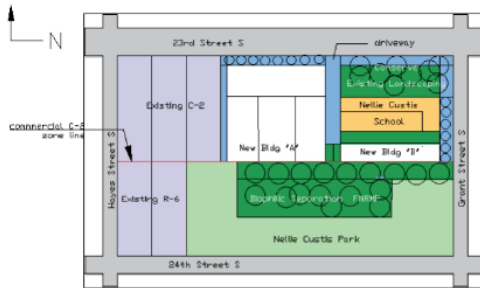
The canopy, windows and doors were replaced.



Attachment F - Aurora Highland Civic Association Proposed Envelope

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

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:



CALCULATIONS

NELLIE CUSTIS SCHOOL

Nellie Custis School approx: 7100 SF x 2 stories = 14,200 SF.
Add 1 story penthouse 2:1 setback 3000 SF = 17,700 SF.

NEW BUILDING A

Use ground floor for Melwood program, 21,500 SF
Upper (2) floors approx 15,000 SF x 2 = 30,000 SF (Letter "U" shape) – step down as required to meet 35' ht. limit.

NEW BUILDING B

SE building 30' = 3 stories x 3900 SF = 11,700 SF

Total ~80K SF

- require a 35' height limit,
- preserve the historic Nellie Custis School building and mature landscaping,
- manage all parking on site, and loading off 23rd 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.

Attachment G - Developer Email Indicating Feasibility of Retaining Nellie Custis School

Below is an email obtained from Virginia Housing via a public FOIA request. In this email Mr. Johnson from the developer, Wesley Housing, indicated to Luke Tate at Virginia Housing there are two site plans depending on “whether the building is renovated / expanded”, “or torn down for new construction”. Mr. Johnson writes he included in his transmission to Virginia Housing building massing for both scenarios under “site plans” attachments.

The attachments were not included, however, in the FOIA response.

From: David Johnson
Sent: Monday, January 8, 2024 5:17 PM
To: Tate, Luke <Luke.Tate@virginiahousing.com>
Cc: Judith Cabelli <JCabelli@whdc.org>
Subject: RE: Questions about VH predevelopment loan criteria

Great news, thanks Luke.

I've also completed the 2nd predevelopment application for our Melwood project in Arlington, which is earlier in the development process than FCC. Here are some notes about that project/application:

- The old public school building (the development site) is now owned by a private owner (Melwood) and the zoning designation of the property is inconsistent with the surrounding zoning, so Wesley and Melwood are pursuing an amendment to Arlington's General Land Use Plan (GLUP), so we can apply for a 4.1 site plan under low to medium residential zoning. Since the project is going through a special GLUP study period, I put Arlington staff's latest study document from November 2023 for the "Evidence of development approvals" attachment. Arlington is generally supportive of the project, however we have to go through the GLUP process to engage with neighbors about building height/massing, so there is no formal development approval yet.
- The outcome of the GLUP study described above will inform whether the building is renovated/expanded, or torn down for new construction. As such, I've included building massing for both scenarios under "site plans" attachments.

Please let me know if I can clarify any more details about Melwood (or FCC). And I'm available for a call anytime this week if helpful.

Thanks,
Dave

From: Tate, Luke <Luke.Tate@virginiahousing.com>

Ref file#: 0a69f3b0-47bb-1e79-01df-bc8af3a0742e
Melwood Wesley/messages
FOIA Request Response from Virginia Housing 7/31/2025

Appendix C: Letter from HALRB to County Board



HISTORICAL AFFAIRS AND LANDMARK REVIEW BOARD

Courthouse Plaza One 2100 Clarendon Boulevard, Suite 700 Arlington, VA 22201
TEL 703.228.3830 FAX 703.228.3834 www.arlingtonva.us

February 3, 2025

Chairman Takis P. Karantonis
Members of the Arlington County Board
2100 Clarendon Blvd.
Arlington, VA 22201

Sent via email

Dear Mr. Chairman and Members of the County Board:

I am writing regarding the concerns of the Arlington County Historical Affairs and Landmark Review Board ("HALRB") about the Melwood Site Plan proposal (the "Melwood Proposal") to redevelop the property now occupied by the 102-year-old Nelly Custis School located at 750 23rd Street South in Arlington.

On June 20, 2024, the HALRB considered a local historic district designation request from an Arlington County resident received pursuant to Section 11.3.4.A of the Arlington County Zoning Ordinance ("ACZO") urging historic preservation of the Nelly Custis School. The HALRB found that the school building met at least two of the eleven criteria warranting possible historic designation, as set forth in the ACZO. That action initiated a legal review process that starts with County preparation of a review study to ascertain the actual historic significance of the school building with a recommendation as to whether creation of a local historic district is warranted. Regrettably, that review study has not yet moved forward, and we have been informed that, with current historic preservation staffing levels and two other local historic district nominations "in line" before it, it will not begin before late 2025.

In the meantime, the County has proceeded full speed ahead on a separate track with a site plan review, under Administrative Regulations Section 4.1 ("Section 4.1"), of the Melwood Proposal, soon to be before the County Board, to demolish the Nelly Custis School and redevelop the property. We do not believe continuing this site plan review process is consistent with the historic preservation review process. The notion that the two processes move forward on separate tracks sets the two processes - and two very different visions for the property - on a collision course, where one, if approved, provides a site plan that calls for demolition of the building, while the other, if approved, calls for a local historic district that prohibits such demolition.

This is not how the Section 4.1 site plan process is supposed to work. Section 4.1 is supposed to ensure proper analysis, including consideration of historicity. Section 4.1, Attachment O, states in part, "Historic properties include buildings and sites classified with the following categories," and goes on to include "those identified for preservation (e.g. full, frontage, façade) in County-adopted plans and policies...." This property is currently pending review for preservation. The HALRB's June 20, 2024, action on the petition urging preservation of the Nelly Custis School set in motion a "County-adopted plan and policy," specifically adopted in ACZO to determine whether the Nelly Custis School is historically significant.



HISTORICAL AFFAIRS AND LANDMARK REVIEW BOARD

Courthouse Plaza One 2100 Clarendon Boulevard, Suite 700 Arlington, VA 22201
TEL 703.228.3830 FAX 703.228.3834 www.arlingtonva.us

The process requires a study by the County, which is to be followed by a vote of the HALRB to either recommend or not recommend preservation as a local historic district. If the vote is to recommend a local historic district, that decision is forwarded to the County Board for a final decision. Now that the historic preservation process has started, Virginia law, specifically Va. Code Ann. § 15.2-2306 (2024), prohibits the County from issuing any permit to raze or demolish the Nelly Custis School until 30 days after the final decision of the County Board on the local historic district. Accordingly, any plan to demolish the school cannot move forward until the historic review process is complete.

At the HALRB's January 15, 2025 meeting, the Melwood Proposal representatives voluntarily presented their site plan to the HALRB for input. The Arlington County resident who submitted the local historic district designation application was also present. The HALRB's consideration of the site plan and provision of relevant feedback was difficult, if not impossible, when the proposal calls for demolishing a building that is simultaneously under consideration for preservation. All parties present at the meeting agreed that the two separate processes were creating confusion for the involved stakeholders of the Melwood Proposal and the Nelly Custis School.

As the primary governing body, the County Board is now required by law to complete the historic review. To proceed with approval of the Melwood Proposal without producing a timely historic review study that has been called for by the HALRB based on ACZO regulations, would be a circumvention of County regulations and contrary to state law. The prudent move would be to prioritize this study and to put a hold on the site plan process until the final decision on the historic review process.

We urge your prompt attention to this matter and look forward to receiving a study so that we can continue our historic preservation review process on the Nelly Custis School property.

Best,

A handwritten signature in black ink, appearing to read "KSM".

Kaydee Myers,
Chair,
Historical Affairs and Landmark
Review Board

cc: Planning Commission
Kevin Lam (Planning Staff, CPHD)