The Color Lines of Racially Restrictive Covenants

Segregation Walls on Record

By Janine DeWitt and Kristin Neun

"Their houses were on the hill and all around them were whites. We were always surrounded by whites all around. They weren't that close to us because there was a lot of fields and George Mason Drive back there was a just a path through the woods years ago."[1]

–Mignon Johnson, Halls Hill/Highview Park Community Member

In 1901 W.E.B. Du Bois declared, "The problem of the twentieth century is the problem of the color line."[2] Observing patterns of segregation, Du Bois noted that racial boundaries shaped everyday life: "It is usually possible to draw […] a physical color line on the map, on the one side of which whites dwell and on the other Negroes. The winding and intricacy of the geographical color-line varies, of course, in different communities."[3] These "color lines" increasingly circumscribed African American communities, limiting where members of those communities could live, rent, or own property in Arlington.

Racially restrictive covenants contributed to the segregation of Arlington neighborhoods. This article outlines the history of those racially restrictive covenants as part of the ongoing research project Documenting Exclusion and Resilience. The project was created by an interdisciplinary team from Marymount University and the University of Mary Washington to document the use of racially restrictive (racial) covenants across Northern Virginia (NoVA) as well as the resilience and agency of those excluded by such covenants.[4] An interactive, regularly updated online map displays the location of racial covenants and

the changing "choices" available to those who wanted to live in Arlington during the study period of 1900–1968.

Within each NoVA jurisdiction, racial covenants were used by real estate developers as they constructed segregated subdivisions. While these racial restrictions placed significant limitations on the development of residential housing and the "choices" available for non-white Arlingtonians, covenants are only one component of Arlington's segregation story. In this article we describe the use of racial covenants in Arlington County in terms of the language used in covenants, the types of land records that contained racial covenants, the period that these covenants appeared in the Arlington County Land Records, and the geography of covenants.

What are Racially Restrictive Covenants?

A restrictive covenant is a standard clause inserted in property documents and recorded in a local government's public land records that limits the way a property can be used.[5] A racially restrictive covenant was a legal clause that used race, religious affiliation, or national origins to exclude or limit who could own or use a piece of land. There were additional kinds of restrictions placed in land records, some of the most common being homeowner association, income, and commercial use restrictions.

Beginning in the early 1900s, racial covenants were increasingly incorporated in land records to create boundaries of exclusion and segregated communities. The Federal Housing Administration (FHA)

Fig. 1: Rationale for restrictive covenants on the Ashton C. Jones property. Deed 474-113 (1939). Land Deeds Office, Arlington County Courthouse.

WITNESSETH that WHEREAS for the purposes of: (FIRST) protecting purchasers of lots in said subdivision from depreciation of the value thereof and to assure them of uniformity in the development of the surrounding property and (SECOND) facilitating the sale by the said Corporation, or its successors and assigns, of the land in said subdivision by reason of its ability to so assure such purchasers of such uniformity and protection against such depreciation and (THIRD) to make certain that said restrictions shall apply uniformly to all the lost in said tract to the mutual advantage of said corporation and all those who may in the future claim title through the said corporation; and

advocated homogeneous or racially segregated neighborhoods to safeguard property values, although this idea was not supported by research at the time, or subsequently.[6] The passage in Fig. 1 describes one Arlington real estate developer's rationale for including racial covenants; he focused on protecting purchasers from depreciation and ensuring the uniformity of neighboring properties.

In 1948 (*Shelley v. Kraemer*), the Supreme Court ruled that racial covenants were discriminatory and could not be enforced by the courts. This ruling did not extend to the actions of private individuals. After 1948, real estate developers and other private property owners continued inserting racially restrictive covenants into property deeds. It was not until 1968 with the Fair Housing Act that the US Congress made racially restrictive covenants illegal.[7]

Northern Virginia circa 1900

"I […] recently learned that Glebewood shares with certain other Arlington developments the unfortunate legacy of legally enforced racial segregation. […] During a recent walk through my one-time stomping grounds, I chatted with several neighbors. None were aware of the old covenants, Glebewood, and once-segregated Halls Hill."[8]

–Charlie Clark, Arlington Community Historian

Current-day observers are often unaware of the dramatic changes that shaped Arlington's housing landscape beginning in the early 1900s. At that time, NoVA's proximity to the nation's capital created a unique social-historical context for those who moved to NoVA's suburban communities.[9] In the first half of the twentieth century, a growing number of racially restrictive covenants were inserted in land records by developers, realtors, and homeowners in the region, reflecting both national housing trends for this period as well as the state and local politics that justified racial discrimination and residential segregation.

Arlington was transformed from a rural landscape to a community that was more modern and residential. The population grew as civic leaders and land speculators sparked growth by reducing crime, building roads, and planning for modern amenities such as water and sewer.[10] This focus on growth coincided with federal policies

and the newly formed real estate industry's standards. Arlington real estate "operators"[11] and builders promoted the idea of homeownership, marketing Arlington's homes as an investment for all.

Under the guise of protecting property values,[12] the FHA, and Veterans Administration (VA) promoted using racial covenants and other exclusionary policies within building codes and zoning restrictions at the local level. Their goal was to create "homogenous" communities in which residents could live among others like themselves. In this way, federal policies stimulated both the supply of and the demand for local housing, placing a "home," within reach for many white families of modest means.

The NoVA region continuously faced housing shortages. The New Deal increased federal government expansion, and in the 1940s, war-related jobs brought additional federal workers to the region.[13] The local demand for housing generated by this expansion and the associated residential development often led to the demolition of African American communities in both Arlington and Alexandria (i.e. the construction of the Pentagon and associated highways).

Between 1870–1900, white and African American Arlingtonians lived and worked in proximity to one another. After 1900, new, increasingly segregated patterns emerged.[14] National policies and real estate practices increasingly promoted the development of segregated communities, limiting the residential options for those who came to the region, including African American families or others who were not "Caucasian." Within these changing racial boundaries, African American Arlingtonians cultivated strong community bonds and leveraged limited resources within their neighborhoods to create a buffer from racial discrimination and shelter when confronted with the prospect of involuntary relocation.[15]

In sum, racial covenants were used by realtors, builders, and homeowners as they constructed color-lines to segregate Arlington. The covenants reinforced racial boundaries that shaped not only residents' day-to-day experiences but also the identity of those living in Northern Virginia. The place called "home" was one of expanding opportunities, or it was a place of increasing restrictions and exclusion, depending on who you were.

The Language of Exclusion: "Caucasian Only"

"My parents […] had just come back from a tour of duty in Italy with the Foreign Service. This was in 1960. They found a house in Arlington they liked. […] However, the covenant stated no Jews. In order for them to buy the house, they needed a petition or letter, signed by the neighbors, saying they had no objections. John Glenn, who lived […] down from us, was the first to sign."[16]

–Personal Anecdote from Arlington Resident

The language of exclusion that was used in Arlington's racially restrictive covenants changed over time, coinciding with changes in the Commonwealth of Virginia laws that were designed to maximize the exclusion of African Americans and others. The earliest deeds in Arlington often excluded "Negroes" or those of "African descent" or "colored persons." By the 1940s, most of the racial covenants in deeds used the broader phrase "Caucasian-only" or "non-Caucasian" to establish a white/non-white divide.

The "Caucasian" label was popularized by eugenicists such as Virginia's first registrar of the new Bureau of Vital Statistics, Walter Ashby Plecker[17] and others, who falsely asserted the biological superiority of the white race. Reflecting a series of racial integrity laws, this group defined racial differences using the percentage of blood a person was thought to have inherited from their ancestors.[18] As social constructions, these racial categories were not supported by scientific evidence and were completely unmeasurable.[19]

In the land records, the terms of exclusion were based on a person's heritage or "blood." For example, reference is made to "negro blood" in this 1911 deed for Rosslyn Farm (Fig. 2).

Some racial covenants such as those found in Bellevue Forest, Country Club Hills, Crystal Springs Knolls, Shirley Woods, and

Fig. 2: Racially restrictive covenant from Rosslyn Farm. Deed 130-139 (1911), Land Deeds Office, Arlington County Courthouse.

The said George G. Bostwick shall have the right to sell or assign his interest in any payments made on account of this agreement, to any white person who may be competent to hold real estate, but it is mutally agreed that under no circumstances shall the land be owned or occupied by a person of negro blood.

That the grantee is not a negro or syrian or a person of negro or syrian blood, and that said lots shall not be owned, used or occupied by a negro or syrian or any person with negro or syrian blood:

Fig. 3: Racially restrictive covenant from Waverly Hills. Deed 327-565 (1931), Land Deeds Office, Arlington County Courthouse.

Waverly Hills used exclusions that today we might consider a reference to ethnicity, religious affiliation, or national origin (Fig. 3).

Over time references to groups identified for exclusion were narrowed, arguably creating a broader definition of "white." For example, starting in 1950 Bellevue Forest removed references to "Gentiles, […] Syrians, Armenians, Jews, Hebrews, Persians, and Assyrians" from racial covenants, while "negroes, […] any person or persons of negro blood or extraction," and "any person or persons not of the Caucasian race," remained the only groups excluded in Bellevue Forest.[20]

Most of Arlington's restrictive covenants mirrored standardized formats circulated in FHA directives[21] and real estate industry publications. In this 1942 correspondence with the developer of the Flower Gardens subdivision, the Davis Ruffner Title Company recommends that Carlos Flower coordinate restriction language with FHA policy (Fig. 4).

Fig. 4: Charles A. Davis to Carlos M. Flower correspondence regarding FHA guidelines in Flower Gardens. 1942. Records of the Offices of Davis and Ruffner. Courtesy Charlie Clark Center for Local History, Arlington Public Library, VA.

February 2, 1942

Mr. Carlos M. Flower
1900 - F Street, N. W.
Washington, D. C.

Dear Sir:

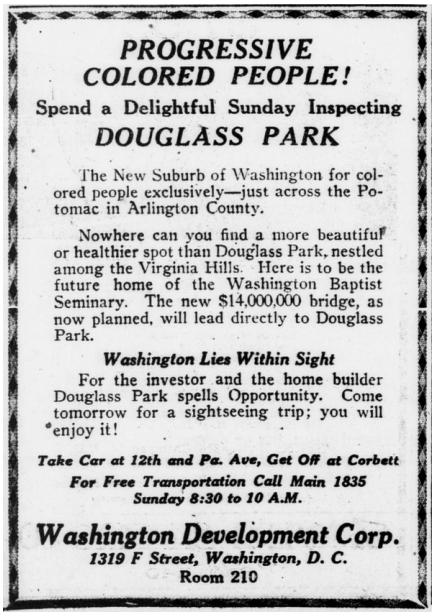
Enclosed find two copies of restrictions to be placed on the new subdivision. I would suggest that you take them by FHA and file with them and obtain their approval so that this will not delay you at some future date when you will want to close a loan with them on the property.

Yours truly,

Charles A. Davis

D/r

In the 1940s some lots in the Douglass Park subdivision were sold with the "Caucasians only" restriction while others contained racial covenants limiting occupancy to "members of the Colored Race" for reasons not completely understood. Interestingly, when Douglass Park was launched in the 1920s, racial covenants were not included in the deeds, although the subdivision was advertised a "colored-only" subdivision for families (Fig.5).



PROGRESSIVE COLORED PEOPLE!

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Nowhere can you find a more beautiful or healthier spot than Douglass Park, nestled among the Virginia Hills. Here is to be the future home of the Washington Baptist Seminary. The new $14,000,000 bridge, as now planned, will lead directly to Douglass Park.

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For Free Transportation Call Main 1835

Sunday 8:30 to 10 A.M.

Washington Development Corp.

1319 F Street, Washington, D. C.

Room 210

Courtesy Library of Congress.

Fig. 5: Advertisement "Progressive Colored People Douglass Park" Evening Star *(Washington, D.C.), May 3, 1924.* Chronicling America: Historic American Newspapers.

The most unusual restriction language was found in Maywood, where prospective owners were limited to either Caucasians or those of "Nordic descent." In some cases, racial covenants excluded African Americans, except for domestic servants.

Types of Racial Covenants Used in Arlington

"There was increasing development in the 1930s in two areas adjacent to Halls Hill on the east and south sides of the neighborhood. As developers planned for the sale of these homes as white-only neighborhoods, the government approved their requests to build fences and walls to restrict Halls Hill residents from accessing the neighborhoods."[22]

–Wilma Jones, Halls Hill/Highview Park Community Historian

The use of racially restrictive covenants primarily occurred in two types of Arlington land transactions: the sale of parcels between individuals and the development of subdivisions.

Restricted Parcel by Parcel—Bargain and Sale Covenants

In early subdivisions, some real estate brokers and homeowners incorporated racial covenants in the bargain and sale deeds used to sell individual lots. One of Arlington's earliest subdivisions to use individual racial covenants on lots was the Clarendon subdivision. Advertisements published at the time promoted Clarendon as a community with "good white neighbors" and an "aggressive up-to-the-Minute Citizens' Association."[23]

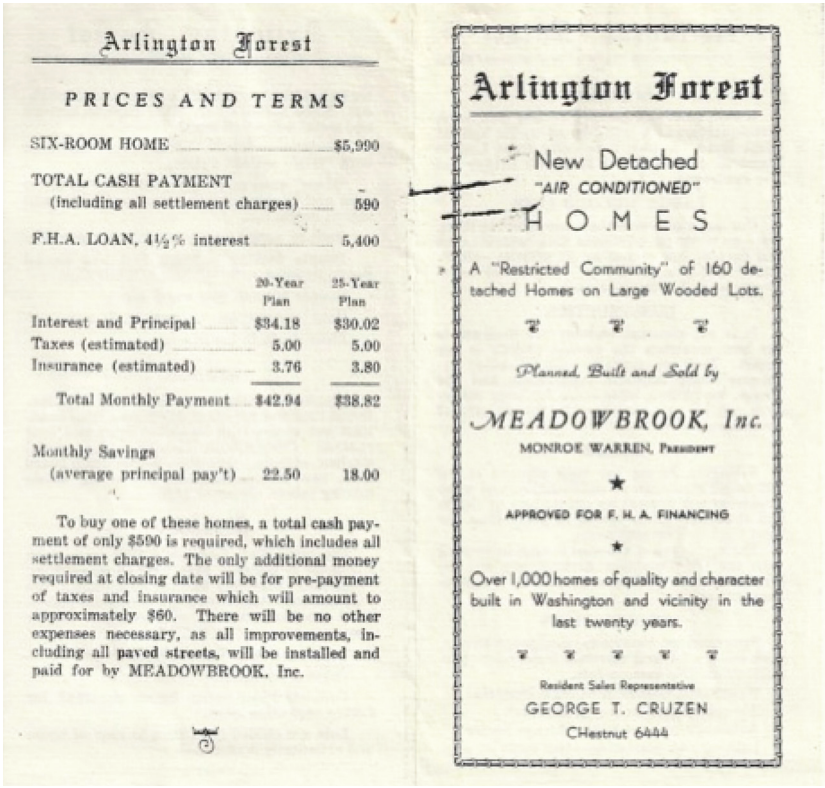
The practice of using covenants in bargain and sale deeds is found throughout Arlington. For example, construction of Woodlawn Village in 1936, which borders the African American neighborhood of Halls Hill/Highview Park, placed racial covenants on individual lots at the time of sale, restricting future sales, leasing, or conveyance.[24] In advertisements, Woodlawn Village was described as a "model" community that was "located on a hill with a view, in a really planned and restricted community."[25]

Restricted by Subdivision—Deed of Dedication Covenants

Although racial covenants continued to be inserted parcel by parcel in other subdivisions,[26] an increasing number of covenants appeared in Arlington's deeds of dedication filed between 1935 and 1958. A deed of dedication is a deed recorded to create all or part of a subdivision. This trend coincided with the federal guidelines that required development-wide restrictions.[27]

Two of the largest subdivisions with dedicated racial covenants were Arlington Forest and Bellevue Forest. Bellevue Forest was advertised as a "delightful and highly restricted proven community." The deeds of dedication for all but one section of Bellevue Forest's eighteen sections included a racial covenant.[28] In Arlington Forest, ten of the eleven sections restricted the use or occupancy of the properties to only persons of the "Caucasian Race" starting in 1939.[29] Advertisements often described Arlington Forest as a "popular priced […] restricted community" for which FHA-insured financing was available (Fig. 6).[30]

Country Club View was developed in the late 1940s and marketed in 1950 as "a livable, lovable, practical homestead" where homeowners would be "surrounded by people of your own stamp!"[31] The original subdivision deeds of dedication restricted ownership and land use



Arlington Forest

PRICES AND TERMS

SIX-ROOM HOME	$5,990
TOTAL CASH PAYMENT (including all settlement charges)	590
F.H.A. LOAN, 4½% interest	5,400

	20-Year Plan	25-Year Plan
Interest and Principal	$34.18	$30.02
Taxes (estimated)	5.00	5.00
Insurance (estimated)	3.76	3.80
Total Monthly Payment	$42.94	$38.82
Monthly Savings (average principal pay't)	22.50	18.00

To buy one of these homes, a total cash payment of only $590 is required, which includes all settlement charges. The only additional money required at closing date will be for pre-payment of taxes and insurance which will amount to approximately $60. There will be no other expenses necessary, as all improvements, including all paved streets, will be installed and paid for by MEADOWBROOK, Inc.

Arlington Forest

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"AIR CONDITIONED"
HOMES

A "Restricted Community" of 160 detached Homes on Large Wooded Lots.

Planned, Built and Sold by

MEADOWBROOK, Inc.
MONROE WARREN, President

APPROVED FOR F. H. A. FINANCING

Over 1,000 homes of quality and character built in Washington and vicinity in the last twenty years.

Resident Sales Representative
GEORGE T. CRUZEN
CHestnut 6444

Fig. 6: Original Sales Brochure for Arlington Forest. Circa 1940s. Arlington Forest Citizen's Association website, http://www.arlingtonforestva.org/AFCA_History_-_Sales_Brochure_1.jpg.

solely to "Caucasians"[32] and was revised for a later section to cover the "Gentile Caucasian Race."[33]

Smaller subdivisions throughout Arlington included racial covenants on the deeds of dedication as well.[34] For example, Flower Gardens, near the Pentagon, was dedicated in 1942 shortly after the US entered World War II. This twenty-six-parcel subdivision was marketed to returning veterans using benefits from the G.I. Bill and for Defense Department workers[35] and used covenants in the deed of dedication to restrict occupancy of lots to persons of the "Caucasian Race."

Whether parcel by parcel or by placing racial covenants in the deeds of dedication, many subdivisions in Arlington excluded groups

EIGHTH: No lot or plot nor any part thereof, nor any interest therein, shall be given, rented, leased, sold, demised, transferred, conveyed, or otherwise disposed of to, or for, or in trust for, the use of any person or persons of any race other than those for which the subdivision was originally intended, and Parmelee, Incorporated, owners and developers of said subdivision, do hereby state, declare and place on public record, that the subdivision as originally intended was and is for the sole use of the white or Caucasian race only, and that the use, or ownership of any part of said subdivision by any negro, or colored person, or any person or persons of negro blood, extraction, or origin, is not a part of its intention, and the use or ownership of any part or parcel of land in said subdivision by any person or persons of such race or origin, shall be strictly prohibited, except that this covenant shall not prevent the partial occupancy by such race as bona-fide domestic servant or servants of an owner or tenant.

Fig. 7: Racially restrictive covenant from Parmelee. Deed 398-203 (1937), Land Deeds Office, Arlington County Courthouse.

of people who were not considered "white" at the time, limiting their opportunities for homeownership.

More Variations

Color line restrictions were also placed in other land records including amendments of dedication, covenant or restriction deeds, deeds of vacation and rededication, re-subdivision deeds, corrective deeds, deeds of trust, partition deeds, charters, agreements, recorded court orders, quit claim deeds, and deeds of release.

While some racial covenants are brief descriptions, others contain detailed language. In the following deed of dedication for the Parmelee subdivision, there were twelve detailed restrictions (Fig. 7).

When part of a larger set of restrictions, some of the common covenants included restrictions on livestock and farm structures, types of fencing, housing setbacks, and mandated single- or two-family use and minimum housing prices. The cumulative impact of all these restrictions contributed to the color-lines of residential segregation during the period of Arlington's soaring growth.

The Period During Which Restrictions Were Used

"*I can remember when my parents bought a house in Bellevue Forest in 1965. The restrictive covenant for negroes was still included in the settlement papers they had to sign. My Dad, a lawyer who read*

things carefully and had seen his Japanese classmates slowly disappear from his high school in Palo Alto, California, in early 1942, made a point of striking the exclusionary language and pointing this out at settlement.[36]

–Personal Anecdote from Arlington Resident

The legality of racial restrictive covenants changed substantially over our study period from 1900 to 1968. The earliest covenants in NoVA, dated 1900, were found in Clarendon in bargain and sale deeds. In 1926, *Corrigan v. Buckley* (1926), the US Supreme Court upheld the use of racially restrictive covenants in private party agreements, allowing their use as new subdivisions were being constructed in Arlington. By WWII, many of these subdivisions included racial covenants in their deeds of dedication. The 1948 Supreme Court case *Shelley v. Kraemer* barred courts from enforcing such covenants but did not bar private parties from using the covenants. The practice of using new racial covenants versus cross-references to prior covenants continued after 1948, but with less frequency.

Some of the last covenants found in Arlington land records were in bargain and sale deeds for individual lots in Claremont (1970) and Overlee Knolls (1971),[37] which appeared after the 1968 Congressional legislation that declared racial restrictive covenants illegal and unconstitutional.[38] While this legislation ended the legal use of racial covenants, zoning regulations and building codes continued to be popular tools to reinforce the color-lines of segregation that would limit the housing choices available to African American Arlingtonians.

The Length of Restriction

Restrictive racial covenants were designed to *run with the land*, meaning the restrictions remained with the property and were binding for future owners. In some cases, large parcels of farmland that were purchased for development became subject to racially restrictive covenants in later residential subdivisions. A restriction ended if required by law or court decision, by a recorded agreement of specified parties, or by expiration of the covenant's term. In some cases, a defined period was placed on the property, ranging from a few years

to ninety-nine years.[39] Those racial covenants were incorporated in three primary ways:

1. Explicit exclusionary language in a deed or other property record that was referenced earlier (most common).
2. A cross-reference to the deed book and page number of a prior land record containing a racially restrictive covenant.[40]
3. A general statement asserting that the property was "subject to the restrictions of record" or the restrictions that have appeared in the chain of title. In some cases, earlier restrictions had been placed on a property but were not repeated each time that property sold. In these cases, a title search is necessary to determine any restrictions previously recorded.

Sometimes the terms for modification of the covenant were specified in the deed. For example, in Arlington Forest the covenant renewed in decade intervals unless changed by the residents.[41] In other situations, prospective buyers found the exclusionary language offensive and refused to sign documents including racial restrictions.[42]

The Geography of Exclusion

The project's online map reveals that from 1900 to 1968 racial covenants existed throughout Arlington County, north, central, and south.[43] They appeared on land records for all types of housing and neighborhoods: single-family communities, apartment complexes, row houses, and duplexes (Fig. 8).

It is possible to broaden our contemporary understanding of the "choices" groups of Arlingtonians made regarding where to live by documenting the extent of exclusion via online maps. In the process, we confront a common contemporary assumption: segregated neighborhoods resulted primarily from the homebuyers' preferences for homogenous neighborhoods. The choices available to African American Arlingtonians and others rested in part on the color of their skin. Mapping racial covenants renders visible the winding intricacy of the color-lines that effectively circumscribed African American community development and limited the housing options for members of those communities.[44]

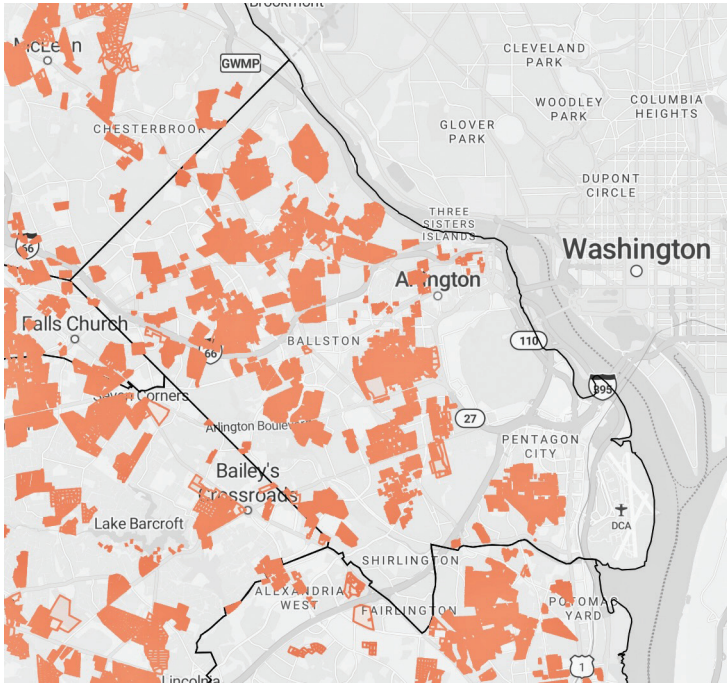
Why Bother Documenting?

"It is our hope that this document will become a living document that is continuously added to as future generations of 'Nauckians' make their contributions to society. This goal is perhaps best expressed by the Akan symbol of the 'Sankofa,' a mythical bird that flies forward with its head turned backwards. The Akan word 'Sankofa' informs us that we must go back and reclaim our past so we can understand why and how we came to be who we are today."[45]

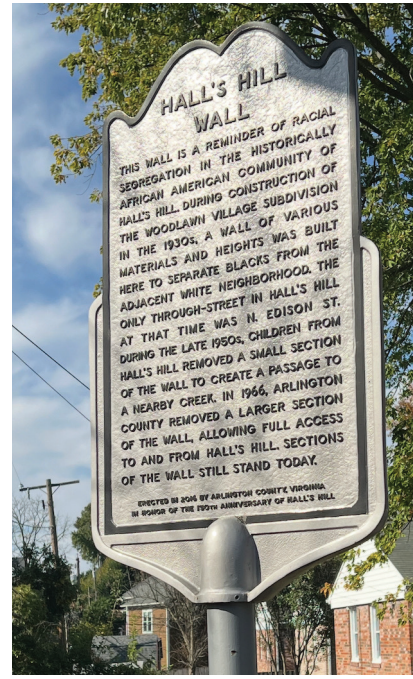
–Dr. Alfred O. Taylor Jr., Green Valley/Nauck Community Historian

Why document the changing color-lines that were created by racially restrictive covenants in Arlington County? While some Arlingtonians assume racial covenants were placed on all residential developments, most are unaware of the contours of residential segregation that

Fig. 8: Map in progress showing distribution of racial covenants found in Arlington, 1900–1968, Documenting Exclusion & Resilience website, https://documentingexclusion.org.



marked the county's historical landscape. Others, including some members of the African American community, who, having lived through this period of the county's history, are all too familiar with the impact of racial restrictions (Fig. 9).



Courtesy of Janine DeWitt.

Fig. 9: Photo of Halls Hill Segregation Wall marker.

In his last editorial for *The Crisis Magazine* (1934),[46] while noting potential benefits of racial segregation by choice, W.E.B. Du Bois also noted that most of the racial segregation found in the United States resulted from racial discrimination. Documenting the tools of racial discrimination used to limit housing opportunities, such as racial covenants, makes it possible to visualize the extent of "choice" that was available to Arlington's residents.

Our understanding of the past needs to be informed by the stories and experiences of ALL Arlingtonians, including the constraints that limited the housing choices and opportunities available to members of Arlington's African American communities. Our research on racial covenants reconstructs one aspect of the challenges faced by these communities, albeit a small piece of Arlington's housing history. As with many other communities, in Arlington's housing landscape there is a gap between the known that is mappable and the unknown that is yet to be discovered.

About the Authors

Janine DeWitt has called Arlington home since 1984. As a Professor Emerita from Marymount University, she enjoys digging through area archives to learn more about Arlington's past.

Kristin Neun worked for almost thirty years on legal and public policy issues involving affordable housing and community development. A member of the Maryland and District of Columbia bars, Kristin received her JD from The American University and an EdM from Marymount University. Kristin is a forty-year resident of Arlington County, seventeen of which have been in historical Glencarlyn.

Endnotes

1. Thomas D. Carroll, *Up on the Hill: An Oral History of the Halls Hill Neighborhood in Arlington County, Virginia*, 2002, 17.
2. W.E.B. Du Bois, "Freedman's Bureau," *The Atlantic*, March 1901: 354–365.
3. W.E B. Du Bois, "IX Of the Sons of Master and Man" in *The Souls of Black Folk*, Scotts Valley, CA: CreateSpace Independent Publishing, 2018, 67.
4. Documenting Exclusion & Resilience is a collaborative team effort with Drs. Krystyn Moon and Matt Bakker. In addition, this research benefited from the expertise of Dr. Delario Lindsey at Marymount University; Heather Crocetto, Judy Knudsen, and John Stanton at the Arlington County Public Library; Nancy Van Doren at Arlington County Land Records; and other Arlington County staff.
5. Legal Information Institute, "Restrictive Covenant," Cornell Law School, https://www.law.cornell.edu/wex/restrictive covenant.
6. Federal Housing Administration, *Underwriting Manual: Underwriting & Valuation Procedure Under Title II of the National Housing Act Section 9 Rating of Location*, 1938, 95; "909. Analysis of Neighborhoods. Certain generally accepted principles should control judgment when analyses of neighborhoods or locations are made. Among the principles are the following: a. Homogeneous development of properties in a neighborhood tends to reduce mortgage risk…"
7. "Racially Restrictive Covenants," Documenting Exclusion & Resilience website, https://documentingexclusion.org/.
8. Charlie Clark, "Our Man in Arlington," *Falls Church News Press*, March 10, 2023, https://www.fcnp.com/2023/03/10/our-man-in-arlington-518/.
9. NoVA communities included the cities of Alexandria and Falls Church and the counties of Arlington and Fairfax.
10. C. B. Rose Jr., *Arlington County Virginia: A History*, Arlington, Virginia: Arlington Historical Society, 1976, 175–203.
11. Kenneth T. Jackson, *Crabgrass Frontier,* New York: Oxford University Press, 1985, 135; "Operator is Pioneer," *Evening Star*, Washington, DC, August 13, 1927.

12. US Commission on Civil Rights, *Understanding Fair Housing*, Clearinghouse Publication 42, February 1973. This early guidance appeared in FHA's 1938 *Underwriting Manual: Underwriting & Valuation Procedure Under Title II of the National Housing Act*: "980 (3). Recorded restrictive covenants should strengthen and supplement zoning ordinances and to be really effective should include the provisions listed below. The restrictions should be recorded with the plat or imposed as a blanket encumbrance against all lots in the subdivision and should run for a period of at least twenty-five to thirty years. Recommended restrictions should include provision for the following: […] g. Prohibition of the occupancy of properties except by the race for which they are intended."
13. Eric C. Yellin, *Racism in the Nation's Service: Government Workers and the Color Line in Woodrow Wilson's America*, Chapel Hill: University Of North Carolina Press, 2013.
14. For more on history of Arlington's African American communities see: Jessica Kaplan, "The Bottom: An African American Enclave Rediscovered," *Arlington Historical Magazine* 16, no. 2 (2018): 7–32; Nancy Perry, Spencer Crew, and Nigel M. Waters, "'We didn't have any other place to live': Residential Patterns in Segregated Arlington County, Virginia," *Southeastern Geographer* 53.4 (2013): 403–427; Lindsey Bestebreurtje, *Built By the People Themselves: African American Community Development in Arlington, Virginia, From the Civil War through Civil Rights*, Columbia, SC: University of South Carolina Press, 2024.
15. Routinely navigating segregated neighborhoods generated what W.E.B. Du Bois called "double consciousness or twoness," yielding a different sense of place for African American and white residents who lived in the same communities. This "twoness" is often expressed in oral histories, when African American Arlingtonians describe the self-contained nature of their neighborhoods. Restricted by discrimination outside of segregated neighborhoods, these communities often provided security and support for African Americans within these limitations, continuously demonstrating both agency and resilience. W.E.B. Du Bois, "The Strivings of the Negro People," *The Atlantic*, 1897: 194.
16. Email correspondence with the authors, March 17, 2022.
17. See Chapter 2 in Laura J. Feller, *Being Indigenous in Jim Crow Virginia: Powhatan People and the Color Line*, University of Oklahoma Press, 2022.
18. Virginia's three racial integrity laws were passed in 1924, 1926, and 1930. Virginia Encyclopedia website, https://encyclopediavirginia.org/entries/racial-integrity-laws-1924-1930.

19. Franz Boas, a leading anthropologist, challenged claims of those who advocated a biological basis for racial superiority.
20. Bellevue Forest racial covenant amendment, Deed 1021-401 (1950). Arlington County Land Records, Arlington Circuit Court.
21. Federal Housing Administration, *Underwriting Manual: Underwriting & Valuation Procedure Under Title II of the National Housing Act, FHA Form No. 2049, Revised Feb. 1938*, Washington: US Government Printing Office, 1938, 531, https://www.huduser.gov/portal/sites/default/files/pdf/Federal-Housing-Administration-Underwriting-Manual.pdf.
22. Wilma Jones, *My Halls Hill Family: More than a Neighborhood*, 2018, 28.
23. See discussion of the racial tensions in Clarendon during the early 1920s describing how Clarendon's Citizen Association constitution limited membership to "Any white person, 18 years of age or over" prompting a countywide discussion. Sean Denniston, "*Bennett v. Garrett*, 1922: When Arlington Became Arlington," *Arlington Historical Magazine* 17, no. 2 (2022): 10.
24. Woodlawn Village. Arlington County Land Records, Arlington County Circuit Court.
25. Advertisement for "Woodlawn Village." Chronicling America: Historic American Newspapers. Lib. of Congress. *The Evening Star*, April 25, 1942.
26. Additional subdivisions with racial covenants in bargain and sale deeds include but are not limited to: Abingdon; Addison Heights; Aurora Heights; Ballston; Courtlands; Country Club Hills; Country Club Grove; Glebe Manor; Glebe Wood Village; Livingstone Heights; Lyon Village; Lyon Park; and Willette Heights.
27. Federal Housing Administration, *Underwriting Manual: Underwriting & Valuation Procedure Under Title II of the National Housing Act, FHA Form No. 2049, Revised Feb. 1938*, Washington: US Government Printing Office, 1938, 934, https://www.huduser.gov/portal/sites/default/files/pdf/Federal-Housing-Administration-Underwriting-Manual.pdf.
28. Section #6 of Bellevue Forest, Deed 1151-458 (1954), is the only dedication that did not contain a racial covenant although the land was previously covenanted.
29. Arlington Forest, Deed 479-153 (1939), Arlington County Land Records, Arlington Circuit Court. The Arlington Forest - McMullen Section, Deed 1544-126 (1964) did not contain a racial covenant in the deed of dedication.
30. Advertisement for Arlington Forest, *The Evening Star*, October 25, 1941.
31. Advertisement for Country Club View, *The Evening Star*, April 15, 1950.

32. Country Club View, Deed 763-47 (1947), Arlington County Land Records, Arlington Circuit Court.
33. Country Club View, Deed 800-252 (1947), Arlington County Land Records, Arlington Circuit Court.
34. Additional subdivisions with covenants on deeds of dedication include: Aurora Hills; Beverly Hills; College Heights; North Barcroft; Lacey Forest; Milburn Terrace; Parkhurst; Tuckahoe Village; and Waycroft.
35. Flower Gardens, Deed 569-520 (1942), Arlington County Land Records, Arlington Circuit Court.
36. Email correspondence with authors.
37. Claremont, Deed 1731-109 (1970) and Overlee Knolls, Deed 1744-147 (1971), Arlington County Land Records, Arlington Circuit Court.
38. Understanding Fair Housing US Commission on Civil Rights, Clearinghouse Publication 42, February 1973, citing the Fair Housing Act (1968) and *Jones v. Mayer* (1968).
39. There is variation in lengths specified from successive periods of ten years (Addison Heights, Deed 579-215 [1942]) to a period of 99 years (Clarendon, Deed 205-107 [1924]); or to a perpetual covenant (Club Manor Estates, Deed 346-459 [1933]), Arlington County Land Records, Arlington Circuit Court.
40. For example, the deed of dedication for Country Club Manors, Deed 569-395 (1942) references a covenant that appeared in the prior deed of the Ella Truett's Estate, Deed 548-437 (1941), Arlington County Land Records, Arlington Circuit Court.
41. Arlington Forest, Deed 574-423 (1942), Arlington County Land Records, Arlington Circuit Court.
42. We learned of these informal modifications through personal anecdotal evidence provided by family members of those who lived in Arlington.
43. See *Documenting Exclusion and Resilience* website, https://documentingexclusion.org/.
44. Ibid.
45. Dr. Alfred O. Taylor Jr., *Bridge Builders of Nauck/Green Valley Past and Present*, 2015, xiii.
46. W.E.B. Du Bois. "PostScript - Segregation," *The Crisis*, 41, no. 1 (January 1934): 20.