

## PENTAGON MEMORIAL FUND VISITOR EDUCATION CENTER

Army National Military Cemeteries Arlington National Cemetery Arlington, Virginia

SECTION 106 PROCESS SUBMISSION: ASSESSMENT OF EFFECTS

DHR Project No. 2023-4078

1<sup>st</sup> Submission: May 25, 2023 2<sup>nd</sup> Submission: April 2, 2024

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## ARLINGTON

#### NATIONAL CEMETERY

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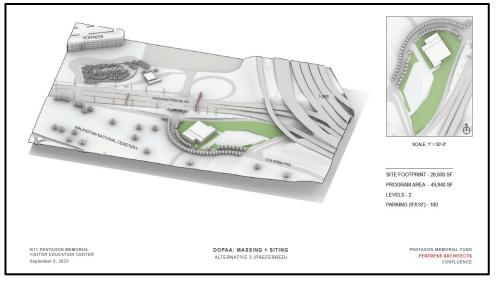
### LOCATION MAP & PROJECT DESCRIPTION

Key to Symbols Drinking Fountain Tram Stop Point of Interest Pentagon 244 **Project Location Arlington National Cemetery** 

The Pentagon Memorial Fund (PMF) proposes to construct and operate a Visitor Education Center (VEC) that will support visitors to the 9/11 Pentagon Memorial. Army National Military Cemeteries (ANMC) will provide a license to the PMF to permit use of the land owned by ANMC.

The proposed building will be sited on approximately 3.71 acres within the ANC Southern Expansion site. After the Federal Highway Administration's Defense Access Roadway project, the VEC would be bounded by Columbia Pike, East Joyce Street, and Washington Boulevard.

The building is anticipated to be constructed at the northeastern end of the site with a building footprint ranging from 25,000 to 30,000 square feet. Up to 100 parking spaces are anticipated and would be located to the southwest of the building. This conceptual design received approval from the National Capital Planning Commission (NCPC) and the U.S. Commission of Fine Arts (CFA).



Plan View of the Visitor Education Center Concept Design

#### PROJECT NARRATIVE & SITE PLAN



**Site Plan for the Visitor Education Center Concept Design** 

The proposed site for the VEC is currently undeveloped land situated amidst the interchange of local road and highways. The site plan on this page references elevation renderings (1 and 2), which are on the following pages.

ANC will provide a license to the PMF to permit use of the land owned by ANC.

The proposed VEC would include exhibits and programs to engage visitors and educate them as to the effects and broad impact of the tragedy of 9/11 at the Pentagon from a variety of perspectives. The proposed VEC would provide details of the 184 individuals who lost their lives on 9/11, interpretive displays discussing the symbolism of the memorial design, permanent restrooms, shelter for visitors, a café, store, and conference space.

The proposed building will be sited on approximately 3.71 acres within the ANC Southern Expansion site. After completion of the Federal Highway Administration's Defense Access Roadway project, the VEC would be bounded by Columbia Pike, East Joyce Street, and Washington Boulevard.

The proposed undertaking would include the construction of a new building with an approximate absolute elevation of 91-feet at the highest point at the SE corner of the building, which includes the rooftop mechanical enclosure. The absolute elevation of the remaining building will be 75-feet to the top of the parapet. At this time, the exact siting of the facility on the parcel has yet to be finalized, however, the building is anticipated to be constructed at the northern end of the site with a building footprint ranging from 25,000 to 30,000 square feet. Up to 100 parking spaces are anticipated and would be located to the south of the building. An entrance on South Joyce Street will serve as the access point for cars, buses, and service vehicles.

In response to DHR's comments, ANMC and the PMF provide the following documentation on the proposed building's height / massing and geographic location.





9/11 PENTAGON MEMORIAL VISITOR EDUCATION CENTER September 6, 2023 FRONT / REAR FACADES
ALTERNATIVE 3D (PREFERRED)

PENTAGON MEMORIAL FUND
FENTRESS ARCHITECTS
CONFLUENCE

Visitor Education Center Concept Design Approved by the CFA and NCPC: Illustration shows the two primary facades where the entrances would be located. The height and the mass of the building are scaled down from earlier iterations. In this design, the first-floor building height is approximately 36'-0" and the maximum elevation of the building is 91'-0".



Visitor Education Center Concept Design Approved by the CFA and NCPC: Illustration shows the lower entry, which would face the Pentagon. This illustration shows how the building would be integrated into the hillside.

## CONCEPT DESIGN: HEIGHT / MASSING



Visitor Education Center Concept Design Approved by the CFA and NCPC: In this illustration, the yellow arrow indicates the location of the VEC. The proposed building is partially obscured by vegetation and the sloping landscape. Views from the Air Force Memorial to the Pentagon remain unobstructed.

## CONCEPT DESIGN: HEIGHT / MASSING



Visitor Education Center Concept Design Approved by the CFA and NCPC: In this illustration, the yellow arrow indicates the location of the VEC. The proposed building is partially obscured by the by vegetation and the sloping landscape. Views from within ANC to the Air Force Memorial remain unobstructed.

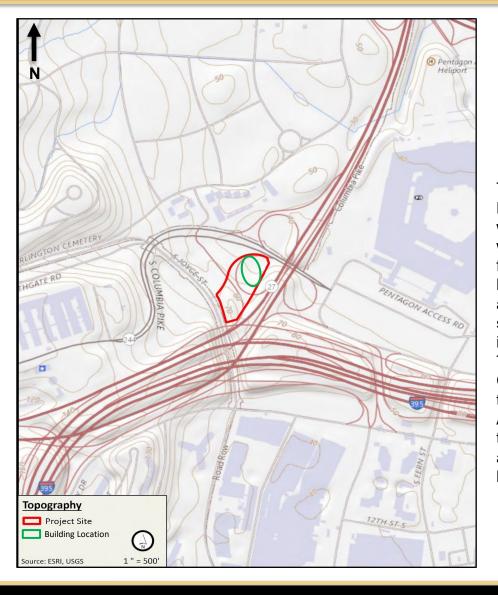


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## CONCEPT DESIGN: TOPOGRAPHY



Topographic Site Plan for the Visitor Education Center Concept Design Approved by the CFA and NCPC

topography surrounding the Project Area slopes generally from west to east, with the topography within the Project Area sloping slightly from southwest to northeast. The highest point of the Project Area is approximately 50-75 feet above mean sea level (AMSL), and the lowest point is approximately 25-50 feet AMSL. The concept design approved by the CFA and NCPC sites the building in the lowest area, around 25-50 feet AMSL. The height of the building at the first floor is approximately 36'-0" and the maximum elevation of the building is 91'-0".



## COMPLIANCE PROCESS TIMELINE



The 9/11 Pentagon Memorial

Dec. 12, 2022:	ANMC initiated the NEPA/NHPA compliance process by hosting a Scoping Meeting at ANC
March 25, 2023:	ANMC initiated NHPA Section 106 consultation with the Virginia Department of Historic Resources (DHR)
June 27, 2023:	DHR letter concurred with the APE, the identification of historic properties, and the potential consulting parties, and provided comments on the proposed undertaking
July 6, 2023:	National Capital Planning Commission (NCPC) approves the PMF VEC concept design
Aug. 4, 2023:	Consulting party invitations sent
Sept. 6, 2023:	Consulting parties meeting (open to the public) and first public comment period
Sept. 27, 2023:	U.S. Commission of Fine Arts (CFA) approves the PMF VEC concept design
Nov. 29, 2023:	ANMC response to DHR comments, additional consulting party invitations sent, and initiation of second comment period for consulting parties and the public
April 2, 2024:	ANMC submits assessment of effects (AOE) to DHR, public, & consulting parties for 30-day comment period
Nov. 2023 - Present:	ANMC and PMF preparing Environmental Assessment (EA)

### **CONSULTING PARTIES**

In accordance with 36 CFR § 800.3(f) and § 800.2(c), ANMC developed an initial list of other parties entitled to be consulting parties.

Based on input from the DHR and consulting parties, this list has been expanded since the initial submission to DHR in March 2023.

As of April 2, 2024, ANMC and PMF have invited the following parties to participate in consultation:

- 9/11 Families United
- Advisory Committee on Arlington National Cemetery
- Advisory Council on Historic Preservation
- Air Force Sergeants Association: Division 2
- Air Force Washington District (AFDW/CC)
- American Legion: General Billy Mitchell VA Post 85
- American Legion: Dorie Miller VA Post 194
- American Legion: VA Post 139
- American Legion: VA Post 46
- Arlington County Department of Environmental Services
- Arlington County government, including the Historic Preservation Program & the Historical Affairs and Landmark Review Board (HALRB)
- Arlington Historical Society
- Arlington House Family Circle

- Arlington Ridge Civic Association
- Aurora Highlands Civic Association
- The Black Heritage Museum of Arlington
- Catawba Indian Nation
- Chickahominy Indian Tribe-Eastern Division
- · Delaware Nation, Oklahoma
- Department of Defense (DoD)
- Environmental Protection Agency, Region 3
- Foxcroft Heights Neighborhood Association
- George Washington Memorial Parkway (GWMP)
- The Guild of Professional Tour Guides of Washington, DC
- Metropolitan Washington Council of Governments
- Monacan Indian Nation
- Nansemond Indian Nation
- · National Association of American Veterans, Inc.

- National Capital Planning Commission
- National Park Service (NPS)
- National Park Service, George Washington Memorial Parkway
- National Register & National Historic Landmarks Program, NPS
- Pamunkey Indian Tribe
- Preservation Virginia
- Rappahannock Tribe, Inc.
- September 11<sup>th</sup> Families Association
- September 11<sup>th</sup> Families for Peaceful Tomorrows
- The United States Commission of Fine Arts
- Upper Mattaponi Tribe
- Washington Headquarters Services (WHS)
- Veterans of Foreign Wars

### ASSESSMENT OF ADVERSE EFFECTS

#### **Summary: Assessment of Adverse Effects**

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the undertaking—the construction and operation of a Visitor Education Center (VEC) that will support visitors of the 9/11 Pentagon Memorial on ANC land licensed to the PMF—will result in **no adverse effects** to the historic properties within the undertaking's APE:

- Arlington National Cemetery Historic District (000-0042)
- Pentagon Office Building Complex (000-0072)
- Air Force Memorial (000-9821)

The VEC design avoids and/or minimizes the direct, indirect, and cumulative effects to above- and below- ground historic properties and contributing elements in the undertaking's APE. There will be no adverse effects to the integrity of the historic properties that would diminish their historical and architectural significance. There are no adverse impacts to the characteristics that qualify the historic properties for inclusion in or eligibility for the National Register of Historic Places (NRHP).

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The following assessment evaluates the potential effects to the three historic properties located in the undertaking's APE.

Construction and operation of the proposed VEC will be outside the boundaries of the three historic properties. Nonetheless, the construction and operation of the VEC will have direct impacts on all three. The roadways immediately surrounding the site will be temporarily impacted by construction, and in the long-term increased traffic is anticipated due to the addition of a public building / community facility. There are no long-term impacts to land use or public access, as the project area for the proposed undertaking is within the grounds of a government facility.

Arlington County categorizes the land use for the project area as government / community facility. The surrounding area is categorized as government / community facility and residential. The site of the proposed VEC is zoned S-3A, Special Districts by Arlington County. The proposed VEC would be considered a permitted use under Section 3.A.3 of the County's Zoning ordinance as "Public buildings and properties of a cultural, recreational administrative or service type, including libraries, fire stations, museums and art galleries..."

There will be viewshed changes for the three historic properties in the undertaking's APE. The VEC will be visible from portions of each site, however, the impacts are minimized by siting the VEC at the lowest elevation within the licensed parcel, by integrating the building into the surrounding hillside, and limiting the first-floor building height to approximately 36'-0" and the maximum elevation of the building to 91'-0". As such, the VEC will not completely block or obstruct views to or from the three historic properties. Washington, DC is still prominently visible from within each site. The VEC's elevation is below that of the surrounding highways, which obscure views of the building from the south and east. See concept designs and topography on pages 6 – 8, and photos on pages 21 – 26, which include views looking to and from the proposed VEC. In addition, landscaping plans for both the Southern Expansion and VEC projects include maintaining existing vegetation and planting additional trees along their boundaries, adjacent to the roadways. This provides additional visual screening between the VEC and the surrounding historic properties.

The NRHP nominations for all three historic properties state their significant representation of themes related to military commemoration, architecture, landscape architecture, politics and government. They are also representative of the design and development of the monumental core that connects Arlington, VA, and Washington, DC. The interconnected viewsheds are an important part of the location, design, setting, feeling, and association of these three sites. The VEC design takes this into consideration and mitigates the impacts to these historic properties. Furthermore, the NRHP nominations for all three sites categorize them as commemorative properties. The proposed VEC, with its connection to the National 9/11 Pentagon Memorial, the commemorative nature of its landscape and structure, is compatible with the location, design, setting, materials, feeling, and association of the historic properties.

### ASSESSMENT OF ADVERSE EFFECTS

#### **Arlington National Cemetery Historic District: Assessment of Adverse Effects**

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the undertaking—the construction and operation of a Visitor Education Center (VEC) that will support visitors of the 9/11 Pentagon Memorial on ANC land licensed to the PMF—will result in **no adverse effects** on the characteristics that qualify the Arlington National Cemetery Historic District for inclusion in the National Register of Historic Places (NRHP).

The Arlington National Cemetery Historic District will retain its historic views and vistas within the cemetery after construction of the VEC. The building will not be visible from most parts of the cemetery, due to its height and setting at the lowest elevation within the licensed parcel. It may impact the contributing viewsheds and vistas from within the ANC historic district's southern end, around sections 8, 66, and 67, looking towards the Air Force Memorial. These impacts, however, are mitigated by siting the building at the lowest available elevation, by integrating the building into the surrounding hillside. limiting the height of the building, and by maintaining the use of vegetation as a visual barrier. Otherwise, the cemetery maintains its historic location and character-defining elements. There will be no irreversible changes to the historic property. The construction of the VEC will not result in changes to the integrity of design, setting, workmanship, materials, location, association, and feeling of the overall ANC Historic District in a way that would change ANC's status on the NRHP. No direct physical changes will be made to areas inside the cemetery's boundary, marked by the new boundary wall constructed as part of the Southern Expansion project. Headstones and circulation patterns in the cemetery remain unchanged. The cemetery continues to convey its historic significance as a military cemetery, for its landscape architecture and architecture.

The NRHP nomination for ANC states it significantly represents themes related to military commemoration, landscape architecture, politics and government, and the design and development of the monumental core that connects Arlington, VA, and Washington, DC. The construction of the VEC is consistent with these themes and does not diminish the ability of the ANC historic district to convey these themes.

The PMF project is designed to avoid and minimize the effects of the project on surrounding resources. The PMF organization has made commitments to include interpretation that represents the history of Queen City and other historic communities connected to the project area. Also, the proposed location and siting of the VEC has been codified through the approval of the conceptual design by the CFA and NCPC. These commitments will be codified in the license and Memorandum of Agreement (MOA) between ANMC and the PMF for construction and operation of the VEC.

The proposed undertaking would have no adverse effect to archaeological resources. All construction will be confined to the land within the APE, which has been disturbed through prior development and construction of surrounding infrastructure. It is not expected that undiscovered cultural resources would be found during construction. However, in the event of an unanticipated discovery during ground disturbing activities, all work would cease, and the ANC Cultural Resource Manager (CRM) would be contacted. The CRM would immediately notify the Virginia Department of Historic Resources and other appropriate agencies, and standard procedures would be followed to protect the artifacts and determine their significance. The license and Memorandum of Agreement (MOA) between ANMC and the PMF for construction and operation of the VEC will include the requirement for the PMF to incorporate the requirements of Stipulations V-IX from the "Memorandum of Agreement among Arlington National Cemetery, the Virginia State Historic Preservation Officer, and the Air Force District of Washington regarding the Southern Expansion Project, Arlington National Cemetery, Arlington County, Virginia," executed December 2, 2019. These stipulations focus on the unanticipated discovery and subsequent protection of historic properties found during ground disturbing operations.

#### Link to Arlington National Cemetery records:

Arlington National Cemetery National Register Historic District documents:

https://www.dhr.virginia.gov/historic-registers/000-0042/

#### ASSESSMENT OF ADVERSE EFFECTS

#### Pentagon Office Building Complex: Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the undertaking—the construction and operation of a Visitor Education Center (VEC) that will support visitors of the 9/11 Pentagon Memorial on ANC land licensed to the PMF—will result in **no adverse effects** on the characteristics that qualify the Pentagon Office Building Complex for inclusion in the National Register of Historic Places (NRHP).

In addition to the NRHP, the Pentagon Office Building Complex is listed on the Virginia Landmarks Register (VLR) and is listed as a National Historic Landmark (NHL).

The proposed undertaking will be visible from the Pentagon Office Building Complex Historic District. However, the historic district will also retain its historic views to Washington, DC, the Potomac River, ANC, the Air Force Memorial, and the National 9/11 Pentagon Memorial. The construction and operation of the VEC will not result in irreversible changes to the location and integrity of the historic property. The resource will continue to convey its significance of architecture, planning, and association to war time. There will be no changes to the district's integrity of location, workmanship, feeling, association, design, and materials. The setting of the resource will be slightly altered with the construction of the VEC, but the surrounding area is categorized as government / community facility or residential, so the construction will not dramatically alter the setting. The 2023 updated National Register nomination for the Pentagon included an increase to the district's boundary. The updated boundary incorporates the National 9/11 Pentagon Memorial into the historic district. The construction of the VEC on property adjacent to the memorial is a compatible use of the ANC licensed land. These lands were transferred to ANC from by Washington Headquarters Service, which maintains the Pentagon facilities.

#### Link to Pentagon records:

Pentagon Office Building Complex National Register Nomination:

https://www.dhr.virginia.gov/historic-registers/000-0072/

#### **Air Force Memorial: Assessment of Adverse Effects**

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the undertaking—the construction and operation of a Visitor Education Center (VEC) that will support visitors of the 9/11 Pentagon Memorial on ANC land licensed to the PMF—will result in **no adverse effects** on the characteristics that qualify the Air Force Memorial for individual listing in the National Register of Historic Places (NRHP). The proposed construction of the VEC does not diminish the memorial's ability to convey its significance or its historic integrity.

The undertaking does place a new structure within the memorial's viewshed. See concept designs and topography on pages 6 – 8, and photos on pages 21 – 26, which include views of the VEC looking toward and from the Air Force Memorial. The renderings show that the proposed building will be partially visible from the memorial as it looks towards the Pentagon Office Building Complex Historic District. Viewshed impacts are minimized by siting the VEC at the lowest elevation within the licensed parcel. Therefore, the Air Force Memorial will retain its significant view of the capital city, the Pentagon, and ANC. Additionally, the location and significant architectural design of the resource will be maintained. The proposed construction of the VEC will not result in irreversible changes to the Air Force Memorial and the resource will continue to convey its significance for its architecture. Therefore, will be no changes to the integrity of the identified resource's location, workmanship, feeling, associations, design, materials. While the construction of the VEC will be a new addition to the setting of the Air Force Memorial, the area surrounding the resource is already characterized with modern buildings and infrastructure. Therefore, the proposed project will not greatly impact the integrity of the Air Force Memorial's setting.

#### Link to Air Force Memorial records:

Air Force Memorial Evaluation of Eligibility for the National Register of Historic Places:

https://www.arlingtoncemetery.mil/Portals/0/Docs/Public-Notices/20190212-AFM-Draft-Determination-of-Eligibility-for-National-Register.pdf



# PREVIOUSLY SUBMITTED DOCUMENTATION



### INITIATION OF THE SECTION 106 PROCESS



9/11 PENTAGON MEMORIAL VISITOR EDUCATION CENTER September 6, 2023 LOWER ENTRY
ALTERNATIVE 3D (PREFERRED)

PENTAGON MEMORIAL FUND
FENTRESS ARCHITECTS

Per 36 CFR § 800.3, on March 25, 2023, Army National Military Cemeteries (ANMC) initiated the section 106 process for the proposed undertaking: construction and operation of a Visitor Education Center (VEC) supporting visitors to the 9/11 Pentagon Memorial. The proposed project is considered a Federal undertaking, as defined in 36 CFR § 800.16(y), and is the type of activity that has the potential to cause effects on historic properties pursuant to 36 CFR § 800.3(a).

Per 36 CFR § 800.3(c), ANMC identified the Virginia Department of Historic Resources (DHR) as the appropriate State Historic Preservation Office (SHPO) to be involved in the section 106 process.

Per 36 CFR § 800.3(c), ANMC planned to involve consulting parties and the public in the section 106 process. After initiating consultation with the DHR, ANMC and the PMF issued invitations to consulting parties and the public via social media, the Arlington National Cemetery (ANC) website, and local news outlets.



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### AREA OF POTENTIAL EFFECT

**Arlington National Cemetery Historic District Boundary** ANC Historic District Boundary ANC property contributing to Arlington House ANC property not contributing NPS properties contributing

Per 36 CFR § 800.4 & § 800.16, ANMC identified the Area of Potential Effects (APE) in consultation with the DHR. The DHR concurred with the APE and identification of historic properties in a letter dated June 27, 2023.

The APE is the geographic area(s) within which an undertaking may directly or indirectly cause changes in the character or use of historic properties. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking.

VDHR guidelines recommend that the APE includes:

- all locations where the project will cause ground disturbance:
- all locations from which the project may be visible or audible; and
- all locations where the project may result in changes to land use, public access, traffic patterns, viewsheds, etc.

Satellite View of Project Area.

Proposed project location in RED.

National Register Historic Districts From ANC's National Register Nomination Form (2014)



#### **IDENTIFICATION OF HISTORIC PROPERTIES**

#### Virginia Dept. of Historic Resources 000:0042:0048 00-0042-0038 Arlington National Cemeter Historic District Virginia Cultural Resource Information System 000-0042 Architecture Resources Project Location Historic Districts Architecture Labels Air Force Memorial Individual Historic District Properties 000-9821 Archaeology Labels 000-0042-0046 County Boundaries APE outlined in BLUE. Historic properties outlined in GREEN. Historic District Proposed project location in RED Title: VEC .25-Mile APE Map DISCLAIMER:Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions. The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain rerors and is provided "as-is". More information is available in the DHR Archives located at 200 400 600 800 Notice if AE sites:Locations of archaeological sites may be sensitive the National Historic Preservation Act (NHPA), and the Archaeological Resources Protection Act (ARPA) and Code of Virginia §2.2-3705.7 (10). Release of precise locations may threaten archaeological sites and historic resources. 1:9,028 / 1"=752 Feet

#### **AREA OF POTENTIAL EFFECTS (APE)**

The Area of Potential Effects (APE) for the proposed project is shown on the map to the left as a blue shaded circle. The APE includes locations where the project may be visible. The project involves ground disturbing activities in previously disturbed areas.

For this project, a visual APE of 0.25-mile is sufficient to capture the potential visual effects of the proposed undertaking. This APE includes all areas in which the proposed VEC may introduce visual elements that diminish or alter the setting, including the landscape, of extant historic resources.

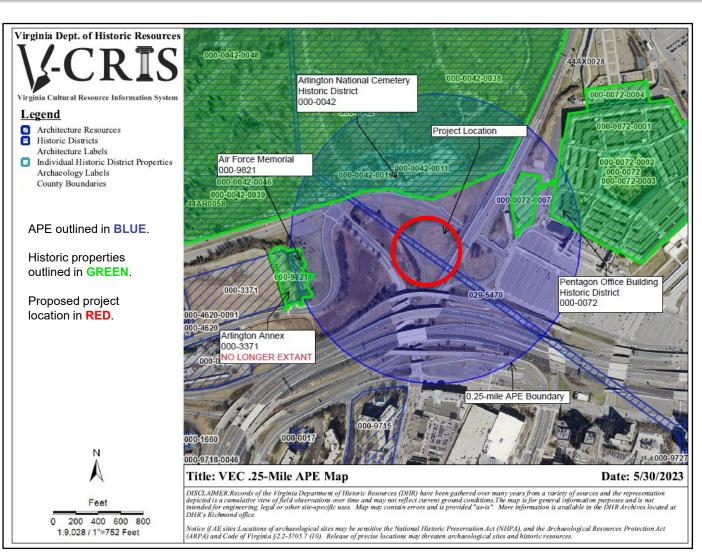
#### HISTORIC PROPERTIES LOCATED WITHIN THE APE

List of historic resources located within the APE:

- Arlington National Cemetery Historic District (000-0042)
- Pentagon Office Building Complex (000-0072)
- Air Force Memorial (000-9821)



#### IDENTIFICATION OF HISTORIC PROPERTIES



## Results of Identification & Evaluation: Historic Properties Affected

Per 36 CFR § 800.4(d)(2), ANMC found that there are historic properties which may be affected by the undertaking. As a result, ANMC notified all consulting parties, including Indian tribes or organizations, inviting their views on the effects and assess adverse effects, if any, in accordance with § 800.5.

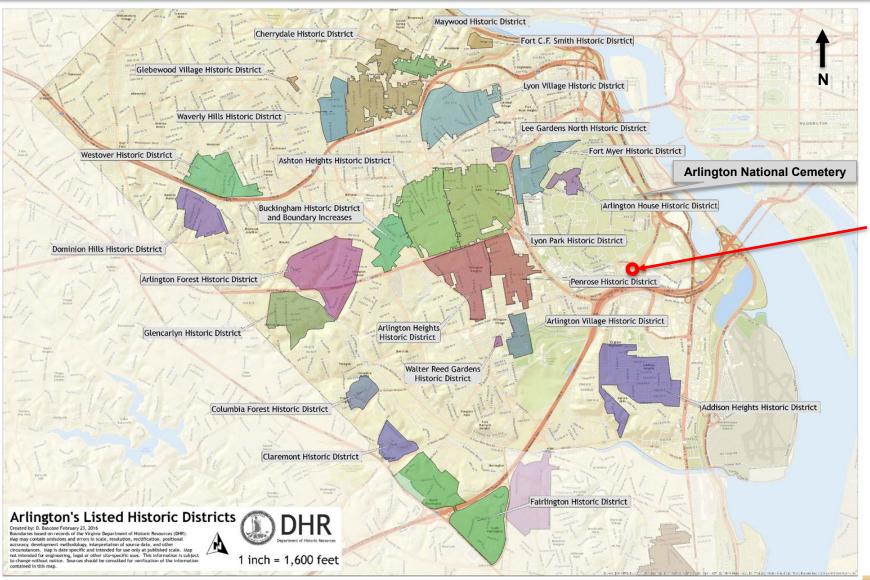


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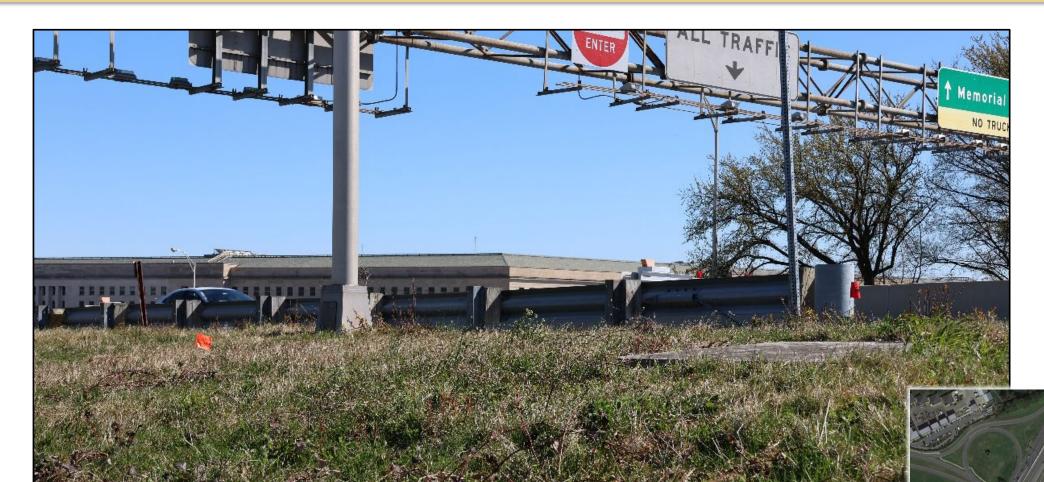
### ARLINGTON'S LISTED HISTORIC DISTRICTS



Proposed project location in **RED**.







View from proposed VEC site towards Pentagon Office Building Complex; looking east.

(Photo by Russ Ruffing / JMT)









**View from proposed VEC site towards Arlington National Cemetery; looking northwest.** 

(Photo by Russ Ruffing / JMT)



#### PREVIOUS ARCHAEOLOGY FINDINGS



The proposed site for the VEC was included in the study area for the Southern Expansion and Associated Roadway Realignment (DHR #2014-1094). According to the Environmental Assessment for that project no archaeological resources recorded in the APE for direct physical disturbances.

"The areas south of the boundary wall have had repeated disturbances from cycles of construction and demolition, and as a result have a very low potential for intact archaeological sites. The history of the site, past land uses, and data from test borings, remote sensing, and excavation done for site evaluation were examined in an archaeological evaluation of the project area. The Virginia Department of Historic Resources has concurred with the findings of that evaluation that intact archaeological deposits are unlikely within the APE, and no further survey is warranted... If unanticipated cultural artifacts would be identified during construction activities, then the appropriate agencies, e.g., Virginia Department of Historic Resources (VDHR) would be notified, and standard procedures would be followed to protect the artifacts and determine their significance."

Environmental Assessment for the Southern Expansion and Associated
Roadway Realignment
August 2019

https://usace.contentdm.oclc.org/utils/getfile/collection/p16021coll7/id/12975



# AGENCY REQUEST FOR RESPONSE TO FINDINGS

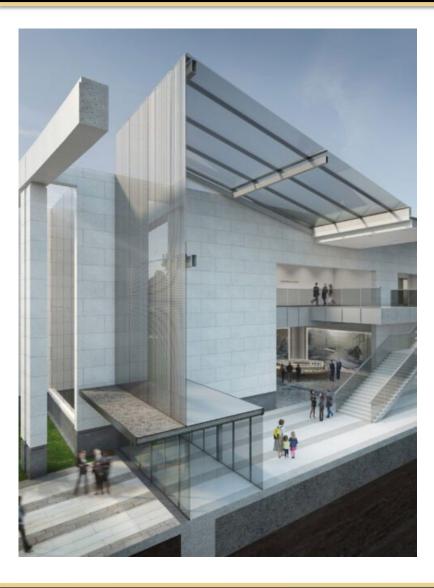


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### ANMC INITIAL REQUEST TO DHR



In the initial submission on 25 May 2023, ANMC requested that the DHR:

- 1. Respond to ANMC's request for review of finding of effect on historic properties.
- Provide concurrence or comments on the determined APE.
- 3. Provide concurrence or comments on the identified potential consulting parties.

#### This submission to the DHR included:

- Electronic Project Information Exchange (ePIX) system submission
- Section 106 Initiation Letter
- Section 106 Initiation Document: Project Description, Identification of Consulting Parties, Identification of Historic Properties, & Area of Potential Effects
- Draft Visual Impact Assessment (VIA)
- Southern Expansion Reference Document: Memorandum of Agreement for the Southern Expansion Project, 2019
- Southern Expansion Reference Documents:
  - Environmental Assessment for the Southern Expansion and Associated Roadway Realignment, 2019
  - Environmental Assessment for the Southern Expansion and Associated Roadway Realignment, Appendices, 2019
  - Archaeological and Historical Evaluations for the Arlington National Cemetery Southern Expansion Project, 2016



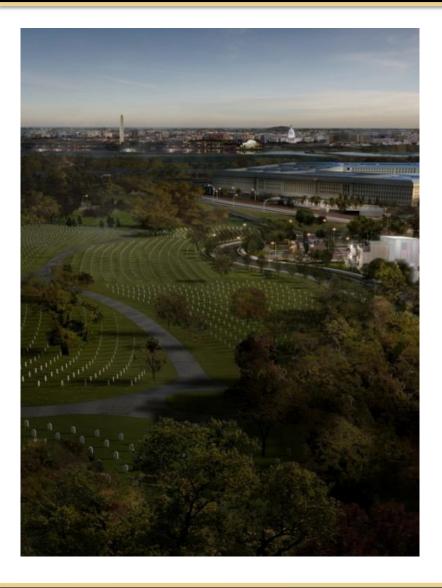
DHR's letter, dated 27 June 2023, concurred with the APE, the identification of historic properties, and the list of potential consulting parties. It also included comments on the proposed undertaking and requests for additional information on the height/massing of the proposed VEC, the location of the building, and an update on consultations with the public and consulting parties.

In response, ANMC notified DHR of a public and consulting parties meeting on 6 September 2023. This meeting coincided with the first of two 30-day public comment periods.

On 29 November 2023, ANMC notified the DHR of a second public comment period. This notification included new documentation related to the proposed undertaking:

- Updated list of consulting parties
- Consulting party meeting minutes
- Consulting party meeting recording
- Updated Visual Impact Assessment (VIA)
- Updated conceptual design drawings
- Conceptual design approval letters from the U.S. Commission of Fine Arts (CFA) and the National Capital Planning Commission (NCPC)

### ANMC CURRENT REQUEST TO DHR



In this third submission, ANMC provides:

- An assessment of adverse effects
- 2. Supporting documentation and summary of previous findings

#### ANMC requests that the DHR:

- 1. Respond to ANMC's finding of:
  - a) No adverse effects to the Arlington National Cemetery Historic District (000-0042)
  - b) No adverse effects to the Pentagon Office Building Complex (000-0072)
  - c) No adverse effects to the Air Force Memorial (000-9821)

Concurrent with this submission, ANMC sends notifications to consulting parties and the public of the initiation of the third 30-day comment period. The notices and Section 106 documentation are posted on both the ANC and PMF websites:

https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices (ANC)
https://www.pentagonmemorial.org/public-notices (PMF)