



DEPARTMENT OF THE ARMY
ARMY NATIONAL MILITARY CEMETERIES
ARLINGTON NATIONAL CEMETERY
ARLINGTON, VIRGINIA 22211-5003

April 2, 2024

SUBJECT: National Historic Preservation Act Section 106 for the Operation and Construction of the Pentagon Memorial Fund Visitor Education Center on the grounds of Arlington National Cemetery, Arlington, Virginia (DHR Project No. 2023-4078)

Ms. Jennifer Bellville-Marion
Project Review Archaeologist
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Bellville-Marion:

Army National Military Cemeteries (ANMC) together with the Pentagon Memorial Fund (PMF) are continuing the Section 106 compliance process for the proposed construction and operation of a Visitor's Education Center (VEC) to support the existing 9/11 Pentagon Memorial (DHR File No. 2023-4078). With this letter, ANMC notifies Virginia Department of Historic Resources (DHR) that, in accordance with Section 106 of the National Historic Preservation Act (NHPA), the agency has applied the criteria of adverse effects (36 CFR § 800.5[a][1]) to the undertaking and finds that the proposed project would have **no adverse effects** to historic properties in the Area of Potential Effects (APE).

In previous correspondence ANMC introduced the undertaking for the construction of the proposed VEC. The goal of the building would be to 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 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. The building is expected to be constructed at the northeastern end of the site with a building footprint ranging from 25,000 and 30,000 square feet. Up to 100 parking spaces are expected 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. This conceptual design has received approval from both the National Capital Planning Commission (NCPC) and the U.S. Commission of Fine Arts (CFA). The design package included proposed façade renderings, site plans, material selections, and renderings providing visualization of the

proposed building from different viewpoints of the surrounding area. The design submissions and approval letters can be viewed on the ANC and PMF websites: <https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices> and <https://www.pentagonmemorial.org/public-notice/>.

Per 36 CFR § 800.3(c), ANMC included the public in the Section 106 consultation process. All relevant project materials were made available online in two locations, the ANC and PMF websites listed above. The online information included a list of consulting parties, products related to the public scoping meeting and the consulting party meeting, Section 106 documentation, a Visual Impact Assessment (VIA), design approval letters from both the CFA and the NCPC, and the approved conceptual design drawings. All parties were invited to participate in two comment periods and a public meeting with a public forum to comment on the undertaking, identification of the project APE and historic properties, and the VIA. Overall, ANMC received 45 comments during these periods, and has responded accordingly. Please refer to Attachment C for a compilation of all comments received as a part of the Section 106 consultations phase.

After consideration of all comments received from VDHR, consulting parties and the public, ANMC has assessed potential effects of the project on each of the three above-ground historic properties in the APE. While there are no eligible archaeological resources within the project APE, ANMC has also assessed potential effects of the VEC project to unknown archaeological resources. ANMC finds that there are **no adverse effects** to the characteristics that qualify the three historic properties in the undertaking's APE for inclusion in or eligibility for the National Register of Historic Places (NRHP):

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

Construction and operation of the proposed VEC will be outside the boundaries of the three historic properties in the undertaking's APE. 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 but not including repair garages, storage or repair yards or warehouses."

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 Attachment D: Section 106 Process Submission: Assessment of Effects, for supporting documentation. 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.

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).

As explained in Attachment D and the VIA, the potential visibility of the proposed VEC from the Arlington National Cemetery Historic District will be negligible. 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 construction of the VEC will not result in changes to the historic integrity of design, setting, workmanship, materials, location, association, and feeling of the district.

The Pentagon Office Building Complex, in addition to being listed on the NRHP, 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.

The Air Force Memorial is eligible for listing on the 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. Views of the VEC to and from the Air Force Memorial can be found in Attachment D and the VIA. 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.

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.

The PMF and ANMC together have worked to ensure that potential effects to the surrounding historic properties have been taken into account throughout the design of the undertaking. Based on the findings of the VIA and the comments received from the VDHR and consulting parties, the PMF has committed 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.

As such, in accordance with Section 106 of the National Historic Preservation Act of 1966 (as amended), ANMC finds that the proposed construction of the Pentagon Memorial VEC will have **no adverse effect** on the historic properties within the APE.

ANMC would like to take this opportunity to submit documentation in support of the agency's Assessment of Effect (AOE) findings for the undertaking.

ANMC transmits the following files in support of the AOE findings:

1. Attachment A: Map of Area of Potential Effects
2. Attachment B: Consulting Party List
3. Attachment C: Comments from Consulting Parties
4. Attachment D: Section 106 Process Submission: Assessment of Effects

By way of this submission, ANMC requests DHR's response to ANMC's findings of:

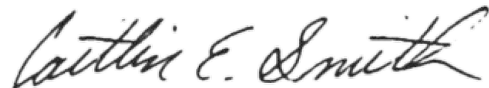
1. No adverse effects to the Arlington National Cemetery Historic District (000-0042)
2. No adverse effects to the Pentagon Office Building Complex (000-0072)
3. No adverse effects to the Air Force Memorial (000-9821)

Please provide DHR's comments on the AOE findings within thirty (30) days of receipt of this letter. All comments on the enclosed documents should be sent to the ANMC Cultural Resources Manager at usarmy.pentagon.hqda-anc-osa.mbx.cultural-resources@army.mil and Sara McLaughlin of JMT at smclaughlin@jmt.com.

Concurrent with this submission, ANMC notified consulting parties and the public of the agency's AOE findings, and of the initiation of a 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> and <https://www.pentagonmemorial.org/public-notices/>.

Army National Military Cemeteries looks forward to continuing the Section 106 consultation process with our agency partners, consulting parties, and the public. Thank you for your support.

Sincerely,



Caitlin E. Smith
Cultural Resources Program Manager
Engineering, Planning & Resources
Army National Military Cemeteries

Attachments:

- A Map of Area of Potential Effects
- B Consulting Party List
- C Comments from Consulting Parties
- D Section 106 Process Submission: Assessment of Effects

Selected project background information:

- [PMF VEC: Section 106 Initiation Letter](#)
- [PMF VEC: Section 106 Initiation Package](#)
- [Project Overview and Scoping Boards](#)
- [Public Notice: Public/Agency Scoping Meeting, December 12, 2022](#)
- [Commission of Fine Arts Letter Approving the PM VEC Concept Design \(Sept. 27, 2023\)](#)
- [Commission of Fine Arts PM VEC Concept Design Presentation \(Sept. 21, 2023\)](#)
- [National Capital Planning Commission Letter Approving Comments on the PM VEC Concept Design \(July 6, 2023\)](#)
- [Visual Impact Assessment: Pentagon Memorial Visitor Education Center \(Updated October 2023\)](#)
- [PM VEC Consulting Party Meeting Minutes \(Sept. 6, 2023\)](#)
- [PM VEC Consulting Parties Meeting Video Recording \(Sept. 6, 2023\)](#)
- [Consulting Party Letter: Attachment B- List of Consulting Parties \(Nov. 2023\)](#)

Arlington National Military Cemetery Historic District National Register Nomination:

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

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>

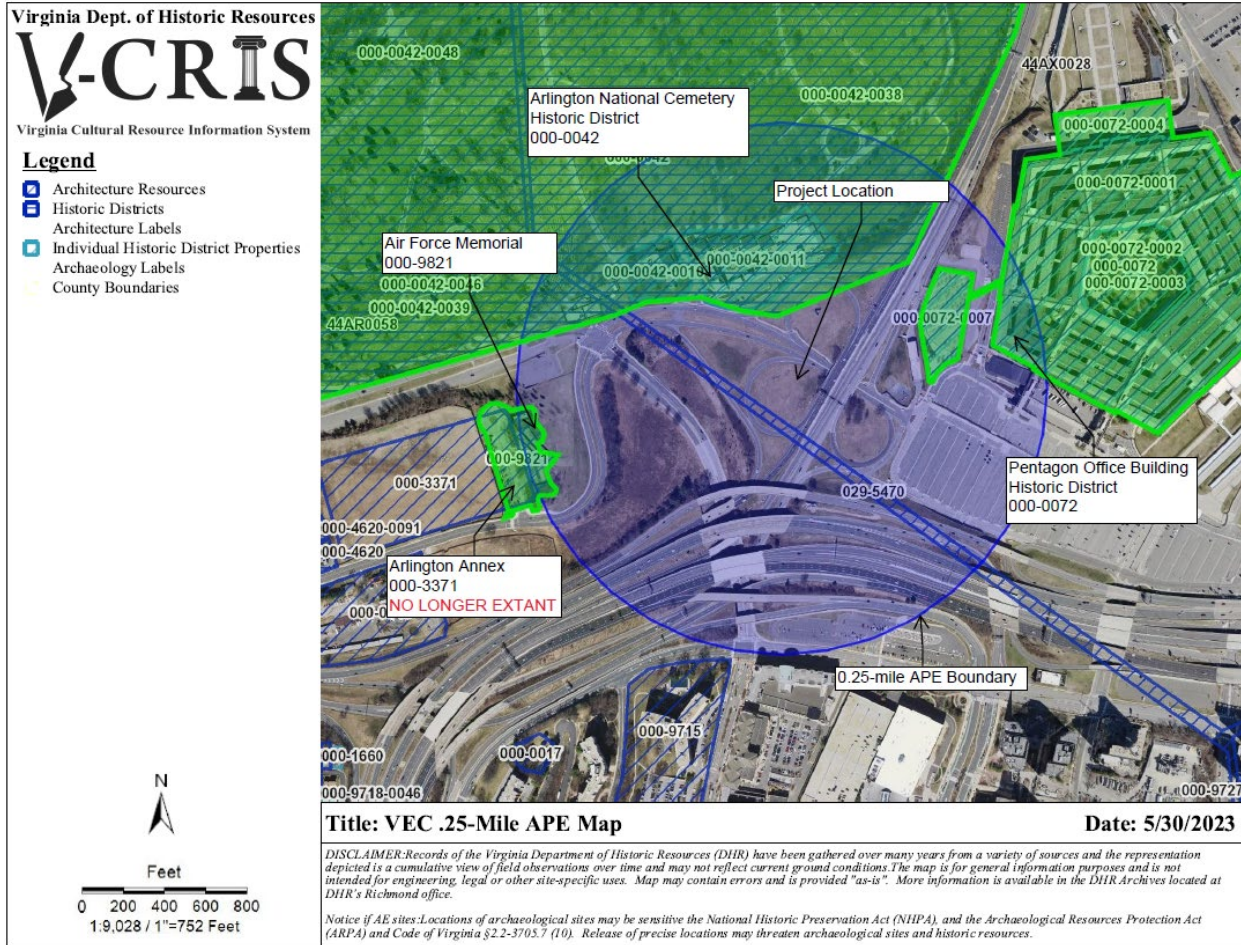
Pentagon Office Building Complex National Register Nomination:

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

Information about Section 106 of the National Historic Preservation Act can be found here: <https://www.achp.gov/protecting-historic-properties>

Information about the ongoing compliance process can be found on the ANC Public Notices page of the ANC website at: <https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices>

Attachment A: Map of Area of Potential Effects



Attachment B: Consulting Party List

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 Historic Preservation Program

Arlington County Historical Affairs and Landmark Review Board

Arlington Historical Society

Arlington House Family Circle

Arlington Ridge Civic Association

Aurora Highlands Civic Association

Catawba Indian Nation (aka Catawba Indian Tribe of South Carolina)

Chickahominy Indian Tribe - Eastern Division

Delaware Nation, Oklahoma

Environmental Protection Agency, Region 3

Foxcroft Heights Neighborhood Association

Metropolitan Washington Council of Governments

Monacan Indian Nation

Nansemond Indian Nation

National Association of American Veterans, Inc.

National Capital Planning Commission

National Park Service

National Park Service, George Washington Memorial Parkway

National Register & National Historic Landmarks Program, National Park Service

Pamunkey Indian Tribe

Preservation Virginia

Rappahannock Tribe, Inc.

September 11th Families Association

September 11th Families for Peaceful Tomorrows

The Black Heritage Museum of Arlington

The Guild of Professional Tour Guides of Washington, DC

United States Commission of Fine Arts

Upper Mattaponi Tribe

Washington Headquarters Services

Veterans of Foreign Wars

Attachment C: Comments from Consulting Parties

First Comment Period and Public Meeting

COMMENT	RESPONSE
<p>Thanks for hosting the Section 106 meeting today, it was a very informative session. I would ask that our civic association be added to the list of invited consulting parties. You can add the email for the President of the Aurora Highlands Civic Association, president@aurorahighlands.org.</p> <p>As Pam Van Hine and I both mentioned, our neighborhood is particularly interested in the impact of vehicular traffic on our neighborhood, as well as ensuring that there are safe routes for pedestrians and cyclists. We look forward to looking at those plans as they are further refined and also participating in Arlington County's review process.</p>	<p>JMT will add the Aurora Highlands to the consulting party list and ensure the organization is involved in the Section 106 process.</p>
<p>Good morning Sara,</p> <p>Thank you so much for last night's consulting parties meeting. As I mentioned, here's more about the Black families and communities who lived on/next to the site from 1825~1944. If you need to branch into research or sources beyond these webpages, please don't hesitate to reach out. Where sources are within the NPS' scope, we'd be happy to help.</p> <ul style="list-style-type: none"> • The Syphax Family (Mt Vernon) • The Syphax Family (NPS) • Freedman's Village (ANC) • Freedman's Village (NPS) • Remembering Arlington's Freedman's Village • From Freedman's Village to Queen City • Arlington History: Queen City <p>As this project proceeds, I advocate that the stories above be included in interior and exterior interpretation. This is a phenomenal opportunity to incorporate educational or memorializing content into the landscape architecture as well as on panels inside the VEC. I encourage you to confront the enslavement, displacement, and eminent domain chapters of this history. Those are the chapters many people need to hear the most and the ones that directly segue into ANC, JBMHH, and Pentagon construction.</p>	<p>PMF is committed to working with experts in the history of the Black families and communities who lived on/next to the site to incorporate interpretation of their stories into the VEC project. At this point in time, PMF is developing plans for potential types of interpretation, which could include: a plaque to commemorate the communities (location not yet determined), a panel to be included within the VEC illustrating the important histories, and/or a statue outside the VEC with a marker for explanation.</p>

<p>Hi, Sara. Doing a story on the visitor center. I know there was a meeting on Sept. 6. Are there any future public meetings, votes, dates that you can share so I can provide some specificity on next steps? Thanks.</p>	<p>A recording of the consulting party meeting will be made available online, in addition to the supporting documents detailing the project. A secondary two-week comment period will be opened in order to provide the new consulting parties an opportunity to comment, as well as for all parties to see updated documentation that was completed to respond to comments.</p>
<p>Comment regarding visual corridors: It appears there is not a cone in the map [referencing viewshed/vista map from ANC ICRMP]. Was the view looking from the Arlington House to the Mall documented in the visual impact assessment?</p>	<p>Yes, the view looking from the Arlington House to the Mall has been documented. JMT completed additional documentation in response to this comment, and the Visual Impact Assessment is being updated. Fieldwork confirmed there will be no visual impact on the character-defining viewshed from the Arlington House towards Washington, DC from the construction of the VEC. Additionally, the Arlington House will have little to no visibility of the proposed VEC as a result of the mature vegetation that characterizes the cemetery. The updated VIA will be made available as one of the supporting public documents for the second comment period.</p>
<p>Comment regarding land usage: Is this project going to consume any burial space?</p>	<p>This question was addressed during the meeting by Agnes Sullivan of ANC. ANC determined, over ten years ago, that the property was not suitable for burials by ANC. Mike McCarthy of PMF followed up to explain that planning for the VEC on this site was not initiated until ANC's determination.</p>

<p>Follow up question to previous comment: Why is the land not suitable for burials?</p>	<p>This question was addressed during the meeting by Agnes Sullivan of ANC. Agnes explained that the land is not contiguous with the cemetery, as it is located on the southside of Colonial Pike.</p>
<p>Jeff asked for more elaboration about architectural compatibility of the proposed design, especially in terms of materiality.</p>	<p>This comment was addressed by Steve White during the public meeting. Steve explained the selected precast concrete was chosen to match existing materials within the cemetery, as was the VA mist, flamed granite. The glazing of the building will make the building read more opaque, like other buildings within the cemetery- many of which are not occupied. Steve also pointed out the CFA and NCPC have been involved in the design processes. The CFA approved the material palette at the hearing held on September 21, 2023.</p>
<p>Second question: How is parking to be handled? At the time of the Air Force Memorial, Arlington County was contentious in terms of bus parking and denied Air Force plans.</p>	<p>This comment was addressed by Steve White during the public meeting. Steve explained that as the layout is shown, the buses will approach the VEC from the Pentagon side on Joyce Street, turn right into the parking lot, and proceed to the loop with a visitor drop off. The drop off runs the length of the building, which allows the buses to queue. All buses would be right turn in and right turn out of the VEC parking lot.</p>
<p>Interested to know if there are any Veterans Associations of the consulting party list</p>	<p>JMT will add Veterans' associations to the consulting party list in collaboration with ANC.</p>

<p>The redesign of the building to a lower profile and alternate siting to the NE corner—lower in elevation—is appreciated. This significantly reduces the viewshed concerns the Air Force submitted from the December 2022 workshop. However, the placement of any structure in this location will likely block the view of the middle and lower portion of the Pentagon.</p>	<p>The Visual Impact Assessment as well as architectural renderings prepared by Fentress Architects indicate the potential viewshed impacts to the Air Force Memorial will be negligible. Additionally, the conceptual project design has been reviewed and approved by both the US Commission of Fine Arts and the National Capitol Planning Commission.</p>
<p>Regarding the viewshed from the 9/11 Memorial NE corner toward the AF Memorial. Construction of the VEC at that site may also interrupt the 9/11 Memorial visitors' view of the AF Memorial in its entirety. Consider the building materials on the eastern side of the VEC with the landscape and tree canopy behind it as well as the stainless-steel spires soaring above it.</p>	<p>Selections for the materiality of the proposed VEC take into account the surrounding area and are chosen based on the compatibility with existing buildings and structures. The VIA and architectural renderings show that viewshed impacts from the 9/11 Memorial will be negligible. All selections are going through the appropriate reviews, and the design (height, mass, footprint, and materials) was approved by the US CFA at a conceptual level in their monthly meeting held on September 21, 2023.</p>
<p>In a like manner, consider the view from the AFM for the building materials on the western side of the building. You may wish to have complementary materials as they will be superimposed on the façade of the Pentagon as seen from the AFM.</p>	<p>Selections for the materiality of the proposed VEC take into account the surrounding area and are chosen based on the compatibility with existing buildings and structures. The VIA and architectural renderings show that viewshed impacts from the 9/11 Memorial will be negligible. All selections are going through the appropriate reviews, and the design (height, mass, footprint, and materials) was approved by the US CFA at a conceptual level in their monthly meeting held on September 21, 2023.</p>

<p>Please consider the reflective nature of construction materials. Any reflection from the materials used on the 9/11 VEC could be blinding to visitors at the AF Memorial looking toward the Pentagon or the DC skyline.</p>	<p>Selections for the materiality of the proposed VEC take into account the surrounding area and are chosen based on the compatibility with existing buildings and structures. The VIA and architectural renderings show that viewshed impacts from the 9/11 Memorial will be negligible. All selections are going through the appropriate reviews, and the design (height, mass, footprint, and materials) was approved by the US CFA at a conceptual level in their monthly meeting held on September 21, 2023.</p>
<p>Consider a traffic study to evaluate traffic flow on Columbia Pike and Joyce Street to determine how the addition of the new facility might impact area traffic. Bus drop off for 3 buses does not seem adequate for Honor Flight, Tour Guild or school field trip bus counts. The cumulative effect of excessive bus and private car traffic may impede traffic on Columbia Pike and the Joyce Street entrance to the ANC Operational Center. It is our experience that Honor Flights can have up to 6 buses at one time. Our main concern is the risk of impeded access due to congestion on or around the ANC Operational Center entrance, the only access point and parking garage for the AFM. Please verify the traffic flow and management of bus traffic and help ensure access to the AF Memorial parking via the Joyce Street entrance to the ANC Operations Center.</p>	<p>Comment noted. A multimodal transportation assessment (MMTA) has been prepared, which includes bus, bicycle, and pedestrian routes, travel sheds, and multimodal trip generation, to inform the transportation section of the EA. The findings of the assessment will also inform the project design. The MMTA includes multimodal trip generation estimates for the number of vehicular, bus, bicycle, pedestrian, and transit trips generated by the VEC.</p>
<p>Regarding commercial bus traffic, AFDW appreciates your consideration of COAs that provide a reasonable way of handling bus traffic on site. We highly recommend you include this capability because Air Force efforts to include a "bus lane" along Columbia Pike at the AF Memorial were not supported by Arlington County in their review of the Defense Access Road project. Additionally, given access concerns from the local "Tour Bus Guild," we recommend you reach out to that organization proactively to solicit their feedback on a bus-related solution that would enable bus traffic to visit the VEC.</p>	<p>Comment noted. JMT will reach out to the party and invite the Tour Bus Guild to participate in the Section 106 consultation.</p>

<p>Regarding your VEC dedicated parking area, we appreciate your plan to provide up to 136 parking spaces for visitors to the VEC. However, we want to emphasize that neither ANC nor the Air Force included any parking requirement for the VEC in the development of Visitor Parking adjacent to the new Pedestrian Access Point to ANC near the AF Memorial. That parking structure is not expected to have any capacity to support the VEC.</p>	<p>Comment noted. The completed MMTA included the assumption that the parking structure used by Arlington National Cemetery would not have the capacity to support the VEC. No further action required at this time.</p>
<p>Please consider food preparation aroma control. It may detract from the visitor experience at the AF Memorial, ANC burials, and visitors on foot between the 9/11 VEC and the 9/11 Memorial. Sight, sound, and smell can be impacted at the AF Memorial given the right wind/atmospheric conditions. Please consider the control of aroma as well as viewshed concerns</p>	<p>Impacts to visitors to the AF Memorial will be addressed in the EA's discussion of affected environments and potential impacts of the proposed action and alternatives considered. Because food service is proposed to be provided using pre-prepared catering and warming areas and not a full-service kitchen, the project will not have the same potential impacts as a full-service kitchen.</p>
<p>While the concept designs do not provide specific details, please consider sound attenuation impacting the surrounding environment. These would include sounds from commercial vehicles backing up on your site. Note: The design of the AF Memorial was oriented on the DC skyline and is a key contemplation feature of the Memorial. If commercial or transportation sounds are heard on a routine basis, it would interfere with the contemplative atmosphere of the AF Memorial.</p>	<p>Design team consultants to follow all applicable codes and ordinances for noise levels, mitigation, pollution, etc. Such codes and ordinances will be assessed in the EA. The loading dock is at the far end of the project site to avoid adverse effects created by sound. Activities that may generate noise over baseline levels (such as trucks with backup signals and landscaping equipment) will be scheduled to occur during hours that the Air Force Memorial and Southern Expansion Area are projected to be less active.</p>

<p>The stated purpose of the VEC is to "...support visitors of the Pentagon Memorial." You may wish to consider the opportunity to connect to visitors of the Arlington National Cemetery (ANC) Southern Expansion and the AF Memorial by adding appropriate design of crosswalks to the north side of Columbia Pike. Plans to enhance the pedestrian pathway along the realigned Columbia Pike offer you the opportunity to connect to pedestrian traffic to/from the new Pedestrian Access Point to ANC at the AF Memorial... in addition to the connection to the Pentagon.</p>	<p>Connecting visitors of the ANC Southern Expansion and AF Memorial is not a component of the Purpose and Need for the VEC as the primary purpose and need is to support visitors to the Pentagon 9/11 Memorial. Connecting visitors of the ANC Southern Expansion and AF Memorial could be considered through further consultation with ANC as an ancillary goal or mitigation measure (if applicable) for the VEC. Furthermore, crosswalks have been predetermined by the DAR project, and will connect the VEC site with the surrounding memorials. The exact locations of these connections are beyond the purview of the VEC project.</p>
<p>Consider a project to place a remembrance of the AA 77 flight path along the sidewalk along Columbia Pike where the aircraft flew over. This may be a way to connect the Pentagon, Pentagon Memorial, VEC, and the AF Memorial. Coordination with Arlington County and ANC construction may be required. This could be a community participation (in design and materials) for how to mark this on the sidewalk.</p>	<p>The PMF will explore this recommendation further as the project design progresses.</p>
<p>GWMP observed that views from Arlington House were not included in this [VIA] assessment and recommends evaluating how views from the property, particularly the east façade, will be impacted by the construction of the VEC. As the 2013 Arlington House Historic District Nomination Update notes, "The dramatic power of Arlington House derives largely from its impressive position and the views and vistas provided by its location. A primary view established during [George Washington Parke Custis] era was from the front of the house looking east towards the expanse of Washington, D.C." Given that this particular view is a key component of the historic landscape, it is important to understand what, if any, visual impacts will be introduced by new construction.</p>	<p>Yes, the view looking from the Arlington House to the Mall has been documented. JMT completed additional documentation in response to this comment, and the Visual Impact Assessment is being updated. Fieldwork confirmed there will be no visual impact on the character-defining viewshed from the Arlington House towards Washington, DC from the construction of the VEC. Additionally, the Arlington House will have little to no visibility of the proposed VEC as a result of the mature vegetation that characterizes the cemetery. The</p>

	<p>updated VIA will be made available as one of the supporting public documents for the second comment period.</p>
<p>As ANMC and PMF develop the interpretive material for the proposed Visitor Education Center, GWMP advocates for the inclusion of information about the Black families and communities who lived on or near the proposed site from 1925 until ca. 1944. This is a phenomenal opportunity to incorporate education or memorializing content into the exterior and interior of the VEC, content that confronts the enslavement, displacement and eminent domain chapters of this area's history. We have identified some relevant materials that may be of assistance while thinking through the interpretive elements of the VEC. Where areas are within our scope, GWMP would be happy to assist in providing research and other materials. SEE ATTACHMENTS.</p>	<p>PMF is committed to working with experts in the history of the Black families and communities who lived on/next to the site to incorporate interpretation of their stories into the VEC project. At this point in time, PMF is developing plans for potential types of interpretation, which could include: a plaque to commemorate the communities (location not yet determined), a panel to be included within the VEC illustrating the important histories, and/or a statue outside the VEC with a marker for explanation.</p>

Second Comment Period

COMMENT	RESPONSE
<p>The redesign of the building to a lower profile and alternate siting to the NE corner—lower in elevation—is appreciated. This significantly reduces the viewshed concerns the Air Force submitted from the December 2022 workshop. However, the placement of any structure in this location will likely block the view of the middle and lower portion of the Pentagon. At the present, there is an inhibited view of the Pentagon. We would appreciate continuing to preserve the view of the annual 9/11 Remembrance, specifically, the U.S flag on the side of the Pentagon Building extending to the middle of the building.</p>	<p>Please refer to Slide 49 (Perspective from Air Force Memorial) Conceptual Design presentation given to the Commission of Fine Arts on September 21st, 2023. This perspective illustrates the visibility of the proposed VEC from the Air Force Memorial. As shown, the design will have little to no effect on the Air Force Memorial's view towards the Pentagon. The conceptual project design has been reviewed and approved by both the US Commission of Fine Arts and the National Capitol Planning Commission.</p>
<p>Regarding the viewshed from the 9/11 Memorial NE corner toward the AF Memorial; construction of the VEC at that site may also interrupt the 9/11 Memorial visitors view of the AF Memorial in its entirety.</p>	<p>The view from the NE corner of the 9/11 Memorial looking towards the Air Force Memorial is characterized by dense vegetation which partially obscures the visibility of the Air Force Memorial. The construction will not impact the 9/11 Memorial's visibility towards the Air Force Memorial. The topography of the areas in question will also ensure the Air Force Memorial's continued visibility of the 9/11 Memorial. Additionally, the conceptual project design has been reviewed and approved by both the US Commission of Fine Arts and the National Capitol Planning Commission.</p>
<p>Regarding the viewshed from the 9/11 Memorial to the AF Memorial, consider the building materials on the eastern side of the VEC with the landscape and tree canopy behind it as well as the AFM stainless-steel spires soaring above it in the distance. In a like manner, consider the view from the AFM for the building materials on the western side of the building. You may wish to have complementary materials as</p>	<p>Selections for the materiality of the proposed VEC take into account the surrounding area and are chosen based on the compatibility with existing buildings and structures. The VIA and architectural renderings show that viewshed impacts from the 9/11</p>

<p>they will be superimposed on the facade of the Pentagon as seen from the AFM.</p>	<p>Memorial will be negligible. All selections are going through the appropriate reviews, and the design (height, mass, footprint, and materials) was approved by the US CFA at a conceptual level in their monthly meeting held on September 21, 2023.</p>
<p>Please consider the reflective nature of construction materials. Any reflection from the materials used on the 9/11 VEC could be blinding to visitors at the AF Memorial looking toward the Pentagon or the DC skyline.</p>	<p>Selections for the materiality of the proposed VEC take into account the surrounding area and are chosen based on the compatibility with existing buildings and structures. The VIA and architectural renderings show that viewshed impacts from the 9/11 Memorial will be negligible. All selections are going through the appropriate reviews, and the design (height, mass, footprint, and materials) was approved by the US CFA at a conceptual level in their monthly meeting held on September 21, 2023.</p>
<p>Consider a traffic study to evaluate traffic flow on Columbia Pike and Joyce Street to determine how the addition of the new facility might impact area traffic. Bus drop off for 3 buses does not seem adequate for Honor Flight, Tour Guild or school field trip bus counts. The cumulative effect of excessive bus and private car traffic may impede traffic on Columbia Pike and the Joyce Street entrance to the ANC Operational Center. It is our experience that Honor Flights can have up to 6 buses at one time. Our main concern is the risk of impeded access due to congestion on or around the ANC Operational Center entrance, the only access point and parking garage for the AFM. Please verify the traffic flow and management of bus traffic and help ensure access to the AF Memorial parking via the Joyce Street entrance to the ANC Operations Center.</p>	<p>Comment noted. A multimodal transportation assessment (MMTA) has been prepared, which includes bus, bicycle, and pedestrian routes, travel sheds, and multimodal trip generation, to inform the transportation section of the EA. The findings of the assessment will also inform the project design. The MMTA includes multimodal trip generation estimates for the number of vehicular, bus, bicycle, pedestrian, and transit trips generated by the VEC.</p>
<p>Regarding commercial bus traffic, AFDW appreciates your consideration of COAs that provide a reasonable way of handling bus traffic on site. We highly recommend you include this capability because Air</p>	<p>Comment noted.</p>

<p>Force efforts to include a “bus lane” along Columbia Pike at the AF Memorial were not supported by Arlington County in their review of the Defense Access Road project.</p>	
<p>Regarding your VEC dedicated parking area, we appreciate your plan to provide up to 136 parking spaces for visitors to the VEC. However, we want to emphasize that neither ANC nor the Air Force included any parking requirement for the VEC in the development of Visitor Parking adjacent to the new Pedestrian Access Point to ANC near the AF Memorial. That parking structure is not expected to have any capacity to support the VEC.</p>	<p>Comment noted. The completed MMTA included the assumption that the parking structure used by Arlington National Cemetery would not have the capacity to support the VEC. No further action required at this time.</p>
<p>Please consider food preparation aroma control. It may detract from the visitor experience at the AF Memorial, ANC burials, and visitors on foot between the 9/11 VEC and the 9/11 Memorial. Sight, sound, and smell can be impacted at the AF Memorial given the right wind/atmospheric conditions. Please consider the control of aroma as well as viewshed concerns</p>	<p>Impacts to visitors to the AF Memorial will be addressed in the EA's discussion of affected environments and potential impacts of the proposed action and alternatives considered. Because food service is proposed to be provided using pre-prepared catering and warming areas and not a full-service kitchen, the project will not have the same potential impacts as a full-service kitchen.</p>
<p>While the concept designs do not provide specific details, please consider sound attenuation impacting the surrounding environment. These would include sounds from commercial vehicles backing up on your site. Note: The design of the AF Memorial was oriented on the DC skyline and is a key contemplation feature of the Memorial. If commercial or transportation sounds are heard on a routine basis, it would interfere with the contemplative atmosphere of the AF Memorial.</p>	<p>Design team consultants to follow all applicable codes and ordinances for noise levels, mitigation, pollution, etc. Such codes and ordinances will be assessed in the EA. The loading dock is at the far end of the project site to avoid adverse effects created by sound. Activities that may generate noise over baseline levels (such as trucks with backup signals and landscaping equipment) will be scheduled to occur during hours that the Air Force Memorial and Southern Expansion Area are projected to be less active.</p>

<p>The stated purpose of the VEC is to "...support visitors of the Pentagon Memorial." You may wish to consider the opportunity to connect to visitors of the Arlington National Cemetery (ANC) Southern Expansion and the AF Memorial by adding appropriate design of crosswalks to the north side of Columbia Pike. Plans to enhance the pedestrian pathway along the realigned Columbia Pike offer you the opportunity to connect to pedestrian traffic to/from the new Pedestrian Access Point to ANC at the AF Memorial... in addition to the connection to the Pentagon.</p>	<p>Connecting visitors of the ANC Southern Expansion and AF Memorial is not a component of the Purpose and Need for the VEC as the primary purpose and need is to support visitors to the Pentagon 9/11 Memorial. Connecting visitors of the ANC Southern Expansion and AF Memorial could be considered through further consultation with ANC as an ancillary goal or mitigation measure (if applicable) for the VEC. Furthermore, crosswalks have been predetermined by the DAR project, and will connect the VEC site with the surrounding memorials. The exact locations of these connections are beyond the purview of the VEC project.</p>
<p>Consider a project to place a remembrance of the AA 77 flight path along the sidewalk along Columbia Pike where the aircraft flew over. This may be a way to connect the Pentagon, Pentagon Memorial, VEC, and the AF Memorial. Coordination with Arlington County and ANC construction may be required. This could be a community participation (in design and materials) for how to mark this on the sidewalk.</p>	<p>The PMF will explore this recommendation further as the project design progresses.</p>
<p>Thank you for the opportunity to comment again on the project. DEQ does not wish to be a consulting party for the Section 106 consultation. Please refer to our previous correspondence attached regarding the coordination of the NEPA and federal consistency documents.</p>	<p>JMT will remove Virginia DEQ from the Section 106 consulting party list.</p>
<p>"Thank you for requesting comments from the Department of Historic Resources (DHR) on the referenced project, Pentagon Memorial Fund Visitor Education Center (DHR File No. 2023-4078). We understand that Army National Military Cemeteries (ANMC) feels that the appropriate way to proceed with the Section 106 consultation is to reopen the comment period for additional consulting parties and to provide all parties with the opportunity to review new information in response to comments received. The comments, received in response to the Section 106</p>	<p>No further comments, concurrence noted.</p>

<p>Initiation letter dated June 27, 2023, requested additional information on the massing and height of the proposed building, along with its location on the site. Since these comments were received, the proposed conceptual design and site plan for the Visitor Education Center has been reviewed and approved by the Commission of Fine Arts and National Capital Planning Commission. DHR has reviewed the area of potential effects and identification of historic properties and concur with ANMC's determinations on both."</p>	
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