

Arlington National Cemetery Millennium Project Final Environmental Assessment



Lead Agency:
Arlington National Cemetery
Cooperating Agency:
U.S. National Park Service

June 2013



US Army Corps
of Engineers®
Norfolk District

APPENDIX J:
Comments on Revised Millennium EA
Public Comment Period
12 March 2013 to 12 April 2013

Commenter	Response #
Sierra Club	4, 11, 13, 17, 24, 25, 85, 64, 10, 13, 16, 21, 8, 29, 22, 27, 42, 43, 66, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84
Potomac Conservancy	64, 1, 61, 86, 4, 11, 13, 17, 24, 25, 85, 52, 54, 59, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 58, 63, 90, 47, 62
Virginia Native Plant Society	9, 30, 11, 12, 10, 87, 10, 13, 14, 16, 21, 58, 8, 52
Virginia Native Plant Society - Potowmack Chapter	87, 80, 81, 82
Friends of Arlington Parks	1, 61, 86, 11, 13, 9, 12, 24, 49, 79, 84
Virginia Forest Watch	73, 74, 75, 97, 34, 35, 14, 15, 22, 27, 42, 43, 66, 7, 88, 91, 92
Urban Forestry Commission of Arlington County	4, 11, 13, 17, 24, 25, 85, 10, 13, 16, 21, 14, 1, 8, 28, 89, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 31, 60, 77, 78, 8, 29
Arlington County Parks & Recreation Commission	11, 10, 13, 24, 9, 12, 49, 62, 79,
Old Growth Forest Network	15, 10, 13, 16
Arlington Historical Society	9, 22, 23
Friends of Stadium Woods	1, 61, 86, 73, 74, 75, 97, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 4, 11, 13, 17, 24, 25, 85
U.S. Environmental Protection Agency	Noted
Virginia DHR	2, 4, 23, 44, 52, 54, 3, 58, 90, 5, 6
National Trust for Historic Preservation	42, 43, 44, 45, 46, 10, 11, 23, 26, 4, 11, 12, 13, 46, 56,
Arlington County	52, 54, 55, 56, 57, 58, 59, 60, 23, 8, 32,
Arlington Heritage Alliance	22, 27, 42, 43, 66, 23, 26, 73, 74, 75, 97, 4, 11, 13, 17, 24, 25, 85, 9
Arlington Historical Affairs and Landmark Review Board	48, 47, 62, 52, 54, 59, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 50, 23, 26, 52, 54, 59, 13,
Arlington County Environment & Energy Conservation Commission	52, 54, 59, 10, 13, 16, 9, 12, 51, 11, 24, 32, 39, 28, 89, 11, 13, 90,
Preservation Virginia	11, 13, 4, 11, 13, 17, 24, 25, 85, 52, 54, 59, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 52
National Parks Conservation Association	14, 15, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 4, 11, 13, 17, 24, 25, 85, 58, 63, 90, 50, 10, 13, 16, 21, 22, 27, 42, 43, 66, 23, 26
Private Citizens:	
Michael Nardolilli	11, 8, 24, 34, 35, 92, 19, 20, 10, 13, 16, 21, 83, 18
Mary Campbell	1, 73
Scott Sklar	16, 98
Michael Polovina	1, 73, 34, 99, 53
Jo Dickison	1, 34, 35,
Steve Campbell	9, 12, 24, 83, 13, 10

Nancy Dowling	1, 39, 41,
Pascus Family	1
Jeff Sturman	1, 34, 35, 26
Eleanor F. Quigley	1, 7, 8,
Mitch Opalski	1, 73, 98, 16
Christine M. Freidel	9, 12, 24, 10, 13, 14
Mr. and Mrs. John Franke	1, 7, 11
Claire O'Dea	30, 11, 12, 24, 13
Lori Bowes	1, 13, 14,
Margaret Chatham	1, 73,
Leigh Pickering	9, 30, 11, 12, 10, 87, 10, 13, 14, 16, 21, 58, 8, 52, 85
Heather Selig	97, 73, 67, 68, 7, 88
Virginia McNair	11, 24, 8
David Nichols	11, 24, 8
Nancy Hadley	9, 30, 11, 12, 10, 87, 10, 13, 14, 16, 21, 24, 58, 8, 52, 85
Dionne Fennell	10, 13, 16, 21, 76
Terri Armao	9, 12, 25, 8, 34, 35, 1, 67, 81, 95, 96, 10, 13, 16, 21, 36, 37, 1
Paul Kovenock	95, 8, 34
Jan Kennemer	1, 73
Betsy Washington	11, 13, 24, 7, 39, 66, 12
Carrie Johnson	52, 54, 59, 11, 61
Sherman Bamford	36, 37, 8, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 29
Bernard H. Berne	9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 33, 34, 35, 36, 37, 38
Sally Greenhouse	1, 10, 13, 16, 21
Farrah Dang	11, 10, 8, 53,
Thelma Vickroy	1
Jessica Strother	1, 10,
Elizabeth Gearin	10, 11, 12, 13, 7, 88, 91, 92, 8, 29
Anne Webb	10, 11, 12, 13, 1, 73, 74, 75, 97
Adrienne Bacchus	1, 7, 88, 91, 92, 80, 39
Brent Spence	1, 34, 35, 36
Sue Dingwell	64, 10, 11, 12, 13
Donna Murphy	1, 61, 86, 73, 74, 75, 97, 11, 13, 64
Lucy Spencer	100, 8, 29, 34, 35, 36, 88, 92
Beverly Fleming	34, 35
Susan Dubose	1, 61, 86, 73, 74, 75, 97, 7, 88, 91, 92, 39
James Richardson	1, 61, 86, 73, 74, 75, 97, 7, 88, 91, 92
Maria Durgan	1, 73, 74, 75, 97, 10, 13, 16, 21
Mary Nell Bryant	11, 10, 13, 24, 8, 29
Rachel Johnson	1, 61, 86, 73, 74, 75
Jennifer Frum	1, 73, 74, 34, 35

Kasha Helget	11,10, 13, 14, 8, 29
Lindsay Collins	1, 61, 86
Alexander Ivanchishin	100, 1, 39, 73, 74, 75, 97, 8, 29, 7, 88, 91, 92
Leslie Hagan	39, 7
Mary Free	39, 1, 61, 86, 73, 74, 75, 97, 8, 29
Ron Wise	39, 1, 61, 86, 73, 74, 75, 97, 8, 29
Pete Durgan	39, 100
Carolyn Lloyd	39, 47, 62, 14, 15, 18, 22, 27, 42, 43, 66
	1, 9, 84, 11, 30, 4, 13, 17, 24, 25, 85, 9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 10, 13, 16, 21, 87, 52, 54, 59, 8, 29
Caroline Haynes	
Carole Robinson	1, 73, 74, 75, 97, 14, 15
	7, 88, 64, 1, 61, 86, 73, 74, 75, 97, 8, 29, 22, 27, 42,
Sierra Club Form Letter - ~98 submitted during comment period	43, 66, 69, 70, 81, 95, 4, 11, 13, 17, 24, 25, 85, 34, 35
Carol Shuh	9, 12, 25, 27, 30, 33, 49, 62, 79, 84, 1, 7, 88, 91, 92
	1, 14, 15, 8, 29, 4, 11, 13, 17, 24, 25, 85, 7, 88, 91, 92
Kathy Kelly and James Wright	
Susan Titus	1, 61, 86, 7, 88, 91, 92, 73, 74, 75, 97

**Comments and Responses:
Arlington National Cemetery (ANC) Millennium Project
Revised Environmental Assessment**

Many of the comments received with respect to the March 2013 Environmental Assessment for the ANC Millennium Project were focused on a limited number of issues. Specifically, tree removal, topography, NEPA Process, and historic resources. The comments received are summarized below with responses provided beneath each comment. Responses that resulted in an update to the EA are noted with purple text.

COMMENT 1: Please do not remove the trees.

RESPONSE 1: Removal of trees, especially in the area that includes trees approximately 145 years old, has been avoided and minimized to the maximum extent practicable while still meeting the mission of extending the longevity of the Cemetery and the operational parameters of the Cemetery. Earlier alternatives eliminated large swathes of the ~145 year old forested area, while the preferred alternative E removes approximately 2.63 acres of forest in this area. This land was transferred to ANC for the specific purpose of expansion of the cemetery. The project is being designed to meet the expansion goal while respecting the historic, cultural and environmental resources on-site. The project team feels strongly that the design being developed respects the importance of the existing resources.

COMMENT 2: DHR – It appears that the sketch for Alternative E illustrated in the EA is different than the current version shared with consulting parties....this redesign resulted in the retention of additional large trees....

RESPONSE 2: Concur. The design has continued to evolve, largely due to the NEPA process as well as ongoing consultation with the CFA, NCPC, and consulting parties under Section 106. Because the design will continue to evolve, it is not practical to continue to update the graphics with each design refinement. The graphics and text describe the project design in a reasonable manner to relay both the potential impacts and project benefits. Updates to the design have been noted in the text where applicable.

COMMENT 3: Please confirm the number of trees removed in Alternative F.

RESPONSE 3: Approximately 987 trees were estimated to be removed under Alternative F. This comment does lead to a clarification that Alternative E has evolved in both the number of burial spaces (which has been reduced due to design refinements and in response to comments received) and the number of trees anticipated to be removed (which has gone through a similar process). It is important to note, however, that neither trees nor burial spaces were the primary criteria considered for alternative elimination. If the other Alternatives had gone through additional design development, it is

likely that all alternatives would have less burial spaces and fewer trees removed than originally estimated.

COMMENT 4 (DHR): The EA document should also evaluate the removal of these topographical features when discussing effects to the historic landscape.

RESPONSE 4: Text was added to Section 5.8.4.1 to clarify the changes to the historic landscape based on topographical features changes.

COMMENT 5 (DHR): The DHR believes that any major inadequacies due to parking and traffic flow can be addressed through design revisions to include possible relocation of the committal service shelter to a more centralized spot.

RESPONSE 5: Do not concur. The preferred alternative was chosen as it best meets the operational needs of the Cemetery, while balancing the protection of historic, cultural, and environmental resources.

COMMENT 6: The DHR would expect that ANC and the Corps would address the issues and questions raised above in a subsequent draft of the EA, however, considering the aggressive project timeline we understand if this is not to be the case. IF ANC and the Corps do not plan on further revisions to the EA please respond to our above comments during the ongoing Section 106 process.

RESPONSE 6: Several of the DHR comments were discussed at a Section 106 meeting on Wednesday, April 17, 2013. All comments have been addressed in this response document and within the Final EA as appropriate. The EA was released in December of 2012 for an initial 45 day public review period followed by an additional 30 day public review period from 12 March 2013 to 12 April 2013 for the revised EA. This public comment period allowed was well above normal EA review periods and allowed the interested public ample time to both review and provide comments.

COMMENT 7: The trees are critical to creating the peace and serenity earned by the military men and women who lie beneath them. Trees contribute to the health of our air and water. They mitigate noise of traffic and airplanes.

RESPONSE 7: Concur. Extreme care during the project planning and design process was used to first avoid and then minimize impacts to the forested areas. However, the existing condition of the project site includes many trees, of varying type, age, and condition, so it was inevitable that some trees would be lost to develop this area for expansion of the Cemetery. However, the number of trees being replanted has continued to increase as the design has progressed. The number of trees being replanted has increased to nearly 800 trees (1 1/2" to 5" caliper), plus more than 1600 tree seedlings, and 14000 shrubs. This does meet the request of some comments for "no net loss" of trees.

COMMENT 8: I understand that the planned expansion at Arlington would allow for burials for seven to 12 years. Surely this relatively short period of time does not warrant the destruction of the last remaining old growth forest in the National Capital region. NOTE: Some comments quoted that the expansion would only extend the cemetery by 4-6 years.

RESPONSE 8: It is difficult to provide a final exact determination of the additional years of internments that would be provided by the Millennium project considering the many variables involved with burials at the Cemetery. However, seven to twelve years appears to be a conservative estimate for first internments based on current trends and information available. Considering that the site will still be used for second and/or third internments it is likely that the Millennium site will remain an active area of the Cemetery for several decades.

COMMENT 9: The revised plan is unnecessarily destructive to historic and natural resources and the revised EA does not substantively address major concerns that have been raised about this project.

RESPONSE 9: Do not concur. Preservation of the existing historic and cultural resources has been and remains a top priority of the Cemetery leadership and the project team. The impacts to these resources have been noted and analyzed, per the NEPA process, and many design refinements have been made to minimize and mitigate these impacts. The revised EA does address the concerns previously raised on the project. The Final EA will include the most recent concerns which are being discussed within this Appendix.

COMMENT 10: Specifically, the construction of the loop road into the steep ravine and across a streambed will require a high degree of land disturbance and infilling, which will significantly change the existing topography.

RESPONSE 10: The vast majority of the land disturbance and grading changes are in the former Ft. Myer picnic area. Please see the cross-section added in Section 5.2 which illustrates the largest areas of cut and fill. The existing topography in the steep ravine and across the streambed will not be greatly altered in most areas. Only those areas directly impacted by the roadway and the new columbarium structure will be altered.

COMMENT 11: Of primary concern is the extensive revision of the current topography. The Public Law that transferred Section 29 to the Department of Defense (107-107, Section 2863 (h) (2)), states: "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." The planned route of the "loop road" will require a major degree of contour revision, i.e. significant changes to the landscape.

RESPONSE 11: Per response #10 above, the area within Section 29 is designed to meet the existing contours to the greatest extent practical. The areas with more significant grading requirements are located on the former Ft. Myer property. The area within Section 29, which was transferred under Public Law 107-107, includes the minimal earthwork required to allow for construction of the loop road

and columbarium. The Millennium Project was specifically planned to integrate into the existing topography. The cremated remains and interment spaces were planned for the more consistent gently sloping terrain and the columbaria complexes were planned for the steeper areas. In this manner, the topography of Section 29 is preserved, with only limited cuts required to facilitate the road and columbaria. In fact, the current design includes setting these features into the ground so that the topography on both the edges of slope is not impacted.

COMMENT 12: Given this land disturbance, a full Environmental Impact Statement needs to be conducted.

RESPONSE 12: See response #11 above. The majority of significant land disturbance is not within Section 29, and does not represent a significant impact to the environment. The contours of the proposed Millennium project, though in some cases different than existing conditions, do blend with the current topography of much of ANC as well as the region. The topographic changes will impact the historic landscape but these impacts are not considered significant. A threshold of significance was defined for each resource area and can be found in Section 5.0.

COMMENT 13: Furthermore, the Corps did not adequately consider other alternatives that would be less damaging to the topography and existing old-age trees. For example, why isn't the proposed road designed so that it doesn't cross the stream but instead loops around through the section closest to Ft. Meyer and parallel to McNair Road.

RESPONSE 13: The Millennium Project has been in the planning stages for over ten years. Many alternatives and concepts were considered during this time. However, the final array of alternatives only considers those alternatives that were feasible from an engineering perspective while meeting the project goals. Having the loop road turn toward Ft. Myer would have greatly limited the total number of available spaces. Not only would the in-ground burial spaces in those areas be lost, but the columbarium proposed near the loop road would either be lost or stand in place of the in-ground burials. The Millennium Project was specifically planned to make the best use of existing topography. Cremated remains and interment spaces were planned for the more consistent gentle slope while the columbaria were planned for steeper terrain. Adjusting the alignment of the loop road to the West, looping closer to McNair Road would necessarily include the relocation of the columbaria. Columbarium courts must be located near an access road and committal shelter for appropriate ceremonial access. The movement of these features would reduce the terrain suitable for cremated remains and internment space, reducing the number of burial spaces considerably.

COMMENT 14: The project can and should be redesigned to minimize the destruction of Arlington House Woods. Doing so would provide a buffer to the adjacent old-growth forest and an aesthetic backdrop to the expansion project.

RESPONSE 14: The buffer to the old-growth forest on NPS lands is actually increased in the preferred alternative. Portions of the current ANC maintenance yard would be re-forested, serving to improve

both the aesthetic and environmental aspects of the buffer area. The project is being designed to minimize impacts to the Arlington House woods, and the impacts to the historic resources have been coordinated and resolved through the Section 106 consultation process, with appropriate mitigations.

COMMENT 15: Although the forest that will be cut into for the expansion is not true primary old-growth it does create an important buffer for one of the last remaining old-growth forests in Northern Virginia – probably THE last remaining publically accessible old-growth forest in the region: Arlington Woods. The forest in the planned construction area is important as more than just a buffer, however, since it is recovering and in just a generation or two it will be considered old-growth also. This is significant because we keep losing these old forests, but rarely are we allowing them to recover.

RESPONSE 15: USACE and ANC recognize the historic, cultural and environmental significance of the entire wooded area, which is why the impacts to this area were avoided and then minimized. The majority of trees being removed are in the previously disturbed, non-contiguous area on the northern portion of the site. In addition, many new trees will be planted. Although these trees do not immediately, or in the near future, replace the value of trees lost, in the course of time these trees will develop into environmental, cultural and historic resources in their own right.

COMMENT 16: The "new" redesigned loop road could connect Humphreys Rd (skirting around the edge of the woodlands and behind the Old Post Chapel) to the planned Millennium Rd which (in the design) already connects to Ord and Weitzel. One Columbaria would be eliminated but the other three could be made larger to make up for the lost capacity in the forest.

RESPONSE 16: Due to its higher elevation, a connection to Humphreys Rd would be excessively steep, impacting the ability of the ceremonial caisson to safely use the road. In addition, the re-alignment of such a road would eliminate convenient access to any columbaria placed on the east side of the stream. Lastly, this type of road construction would require much more significant amounts of cut and fill with the associated environmental impacts and tree loss.

COMMENT 17: There are alternatives that would be less damaging to the topography, and therefore in compliance with the Public Law, and to existing old-age trees that would otherwise be removed. These need to receive consideration. For example, during the Millennium Project site visit on March 16, 2013, a question was posed as to why the proposed loop road that curves across the stream and into the steepest and most heavily wooded section could not curve in the opposite direction toward McNair Road.

RESPONSE 17: See response #13 above.

COMMENT 18: Accordingly, the Millennium Project is a very expensive, temporary (and not immediate) fix to the long-term problem of ANC capacity that will have serious environmental and historical consequences. These funds would be better used to fund the acquisition of flat, vacant land (such as a

large farm) for the creation of an “Arlington West Cemetery” or some other permanent, less costly solution.

RESPONSE 18: ANC is currently updating its Master Plan through a separate and distinct process. The land on which the project will be constructed was transferred by Congress to ANC for the express purpose of expanding the cemetery.

COMMENT 19: Control Phosphorous & Nitrogen. While Alternative E is predicted to reduce total suspended solids substantially, the stream restoration will have only minor impacts on reducing nutrients (nitrogen and phosphorus) [EA at 103]. The Cemetery needs to make a significant reduction in the total amounts of nutrients carried off of all ANC grounds by stormwater. Accordingly, Alternative E should include a requirement for turf management plans for 75% of the entire Cemetery with a goal of reducing the Total Maximum Daily Loads of nitrogen and phosphorous by 5% during the next five years. This would match Arlington County’s obligations under VDPES Permit No. VA 0088579 (draft) as required by the Commonwealth’s federally-approved Watershed Implementation Plan.

RESPONSE 19: Both the stream restoration and the modified regenerative stormwater conveyance will likely have positive nutrient reduction benefits. Additionally the expansion of ANC will have no net increase in nutrient pollutant loadings due to its SWM/BMP attributes. While the implementation of turf management plans on ANC is outside the scope of this EA – it is important to note that HB1831/SB1055, Fertilizer, Regulation of Application and Labeling were passed by the General Assembly of Virginia in 2011. This legislation forbids lawn maintenance fertilizer containing phosphorus from being sold in Virginia beginning December 31, 2013.

COMMENT 20: Place the Restored Stream Valley Under Permanent Conservation Easement. An “indefinite” benefit is no benefit. Alternative E “provides the local area with a large green space to remain indefinitely amidst a very urbanized area” [EA at 140] [emphasis added]. As the primary environmental benefit of the project, this green space should be permanently, not indefinitely, preserved. Accordingly, the area of the restored stream valley should be placed under permanent conservation easement with the Virginia Outdoors Foundation or some other land trust in order to guarantee third-party oversight.

RESPONSE 20: Army policy does not allow the placement of third party restrictions on their lands. Because the purpose of the land is a cemetery, it is reasonable to conclude that the development will be protected permanently as a green space.

COMMENT 21: Instead of turning northwest to connect the Loop, however, the Loop Road should be re-routed to turn southeast and connect to the existing road network near the Superintendent's Lodge, thus avoiding the need for this bridge altogether. This approach saves trees, improves the vista and “respects the existing stream” [EA at 37]. Unlike the other Alternatives examined in the EA, this change would neither require the processions to “come through the back door” (through Fort Myer) nor double back on themselves. To make the change in grade a more gradual slope, the proposed Columbarium

and Committal Service Shelter at the southern end of the site could be built at a higher elevation. Significantly, this alternative route for the Loop Road was never analyzed in the EA. At the very least, this proposal should be seriously considered by calculating the amount of tree loss, stream impact and cost factors for this option as compared with Alternative E. Accordingly, either the Loop Road should be re-routed to avoid the stream crossing and connect with the existing road network near the Superintendent's Lodge or the EA should provide a detailed explanation as to why it is not feasible to do so.

RESPONSE 21: See response #16.

COMMENT 22: Direct Destruction of Arlington House Woods. The Environmental Assessment is inaccurate and fails to recognize that almost half of the Millennium Project site area (12 of the 27 acres) is listed on the National Register of Historic Places. It has been on the National Register since 1966.

RESPONSE 22: Arlington House woods are not being destroyed. However, the listing on the NRHP will be clarified in Section 4.8. The historical records are not consistent (as summarized below). This issue was discussed and resolved among the Section 106 consulting parties.

The 1980 NRHP nomination states a number of 27.91 acres, however the maps attached show an area of 24.82 acres, which include the area around Arlington House and Section 29 south and east of the Maintenance Yard and 'stump dump.' The written statement of the NRHP boundary is "all of the land adjacent to Arlington House under National Park Service Jurisdiction." At the time that would have been 29.23 acres. The 1998 survey and 1999 DHR review supports the mapped version of the 1980 boundary. Findings of the 1998 survey were that the areas north of the Maintenance Yard, while part of the NPS property, were disassociated with Arlington House by development, and disturbed or relatively recent growth. This assessment included an area of .89 acres which were not NPS property however, for a total of 25.71 acres. The boundary suggested by the 1998 survey of forested landscape contributing to Arlington House, ANC (within the Millennium project area) has 8.6 acres, NPS has 11.62 acres (there is an additional 1.17 acres not forested which contributes). NPS property around Arlington House adds 4.19 acres for a total of 25.71. The discrepancy of mapping, verbal description, and the acreage on the 1980 nomination is probably due to a lack of accurate land survey data at the time. It is debatable whether the authors of the nomination intended the boundary to be the area mapped as the limits of NPS property and did not know that the 4.41 acres of Section 29 north of the Maintenance Yard were owned by NPS. Whether within the NRHP boundary of Arlington House or not, this area has been determined to not contribute to Arlington House – not all areas within NRHP property boundaries contribute to the property, and this was explicitly determined for the northern 4.41 acres of Section 29 in the 1999 review.

COMMENT 23: Viewshed Destruction. For those parts of Arlington House Woods not slated for destruction, there will be irreparable damage to the viewshed and subsequently the understanding of Arlington House and its setting. It is almost impossible to understand how the Environmental

Assessments asserts that there will be no visual impact on the viewsheds of Arlington House Woods and Arlington House, TWO National Register for Historic Places properties.

RESPONSE 23: Arlington House Woods is not a separate NRHP listing; it is a contributing landscape to Arlington House. There will be no visual effects to the primary defining feature of Arlington House – the house itself -from which the Millennium Project would not be visible. While it would be visible from Arlington Woods, the vista of the new cemetery area would replace the Maintenance Yard, a land fill (referred to as the ‘stump dump’), and a large soil dump (on the Ft. Myer side of the wall). Given this context, the Millennium Project would not have an adverse visual effect on the forest contributing to Arlington House (or Arlington Woods, however defined). A viewshed analysis was completed and is the basis for this determination. This viewshed analysis has been considered within the Section 106 consultation and is included in Appendix B of the Final EA.

COMMENT 24: The proposed Millennium project has not and cannot "meet the contours" of this historic site, as is required by Act of Congress. To be implemented the Millennium project will need to regrade substantial portions of the site, with over 100,000 cubic yards of soil being moved to accommodate efficient burial areas, and this will completely alter the topography of this natural site. In one place the proposed project calls for a 20 foot high retaining wall.

RESPONSE 24: See response #11 above. The significant amount of earthwork is required in response to the required removal of unsuitable soil (clay), replacement with proper foundation and topsoil material, and the use of the pre-placed crypt system. Retaining walls are used to provide the required ADA slopes and a 5% slope for safe operations in the new internment areas. The only retaining walls that exceed 13-feet in height support the areas near the bottomless arch bridge across the perennial stream.

COMMENT 25: Given that the “Millennium project will require significant earthwork”, require the displacement of an estimated 100,000 cubic yards of cut and fill soil and require construction of over two-thirds of a mile of retaining walls up to three-stories tall (EA, p. 95), we believe that the current finding of “no significant impact” is inappropriate and continue to urge that a full Environmental Impact Statement be conducted.

RESPONSE 25: See responses #11, #12 and #24 above.

COMMENT 26: When the various lands were transferred at Arlington House it was with the understanding that any development of the land would be keeping within the character of the property and in such also its designation as a National Register property.

RESPONSE 26: Its designation as a National Register property has been noted. The project team feels that the development of the land is absolutely in keeping with the character of the property and does in fact improve the viewscape in several areas. Also see responses to #22 and #23 above.

COMMENT 27: We respectfully request that the EA be corrected to properly state the issues with the National Register for Historic Places and that the design undergo a substantial review to determine how it could better meet the site constraints of this site that is important to the history of Arlington County, the Commonwealth of Virginia and the United States. It is an important place that deserves extra thorough and accurate review.

RESPONSE 27: The EA has been revised to better describe the National Register for Historic Places information. The proposed project has been planned and is being designed to meet the site constraints to the greatest extent practicable. In addition, as stated in Response # 6 above, a thorough and accurate review has been accomplished.

COMMENTS 28: (sierra) The geological study included in the revised EA identifies a seep in the project area. Impacting this seep could also be avoided by a redesign of that meets the requirements of the law to design within the contours of the land.

RESPONSE 28: There is a spring, but not a seep, in the project area. There are several seeps in the adjacent NPS-administered property. The impacts to the spring were minimized through a re-design of the road to include a bottomless arch culvert. This feature will also allow wildlife passage between two forested areas.

COMMENTS 29: Varying estimates have been provided as to the annual average number of burials at Arlington National Cemetery, ranging between 5,000 and 7,000. Based on these estimates for Alternative E an additional 30,000 burial sites would be created, extending the operation of the cemetery only between 4.2 and 6 years.

RESPONSE 29: See response #8 above.

COMMENT 30: In addition, recent briefings (such as at the National Capital Planning Commission meeting on April 4, 2013) have revealed that the design process for Alternative E is near 100% completion. Under NEPA, public comment must be taken into consideration prior to final design. How is it possible that the planning work was being completed even as comments were still in preparation? The work by the Army Corps would appear to violate the sense of the law, if not the law itself.

RESPONSE 30: The design has continued to evolve significantly, largely based on comments, throughout the NEPA process. NEPA does not dictate the timing of the review process in relation to the design process. In fact, the design has continued to evolve as a RESULT of the NEPA process. Not only has the design been refined, the impact analysis is complete and comprehensive because the agency is fully aware and informed of the potential impacts and can therefore make an informed decision. The NEPA process, including coordination with external agencies, has been ongoing for nearly ten years. Extensive coordination with external agencies has been ongoing for almost a year. Public comments on the draft EA led the agency to determine that further analysis and consideration was warranted. Therefore, a revision of the EA and an additional public review was executed. At the direction of ANC leadership, the

USACE has completed a thorough, deliberate, and publicly-informed NEPA analysis which has resulted in a truly informed NEPA analysis and decision.

COMMENT 31: We also recommend that additional mitigation of any expansion project include funding to treat the invasive species infestation in the remaining National Park Service portion of Arlington House Woods. Any disturbance in this area is going to further stress the remaining section of woods and additional mitigation efforts are needed to protect what little remains.

RESPONSE 31: This is beyond the scope of the authorized project. As the proposed work is not required for the completion of the Millennium Project, expenditure of funds to improve adjacent Department of Interior property would result in a fiscal law violation. In addition, NPS has concerns with invasive species management activities which might include ground disturbing activities that could impact site 44AR0032.

COMMENT 32: Likewise, the proposal to replant 600 small trees will replenish only a small fraction of the eco-system services lost from removing over 800 mature trees. Additional tree planting is also recommended.

RESPONSE 32: Concur. The number of trees being replanted has increased to nearly 800 trees (1 1/2" to 5" caliper), plus more than 1600 tree seedlings, and 14000 shrubs.

COMMENT 33: The EA does not describe the legal basis for the transfer of the interment zone in Section 29 of Arlington National Cemetery from the Secretary of the Interior to the Secretary of the Army, as specified in the National Defense Authorization Act for Fiscal Year 2002 (Public Law 107-107). Further, the EA does not describe the provisions in the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6), approved by the President on March 6, 2013, that appropriated funds for the Millennium Project. It is not possible for anyone to provide an informed response to the EA without this information.

RESPONSE 33: The EA cites the Public Law which transferred the land to ANC. This is sufficient background information for an informed analysis. The 2013 appropriation for the project is not relevant to the NEPA decision –making process.

COMMENT 34: Public Law 107-107, Section 2863 (h)(1) required the Secretary of the Interior to transfer jurisdiction over the interment zone to the Secretary of the Army within 30 days of the law's enactment. Public Law 107-107, Section 2863 (h)(2) requires the Secretary of the Army to use the interment zone for belowground burials and columbarium. However, Public Law 107-107 does not provide the date by which the Secretary shall begin to use the interment zone for burials and columbaria. Although not anticipated when Congress enacted Public Law 107-197, the Navy Annex is now available for such uses.

RESPONSE 34: The appropriate use of the former Navy Annex property will be considered within the ANC Master Plan. Burial space at ANC is limited, and it is the direction and intention of ANC to move

forward on expansion in the near future, in order to ensure future space is available for our fallen Veterans and their loved ones.

COMMENT 35: Arlington National Cemetery needs to fully utilize the Navy Annex for burials and columbaria before considering the use of any part of Section 29 and the former Fort Myer picnic grounds for burials and columbaria.

RESPONSE 35: The most appropriate use of the former Navy Annex site will be considered in the ANC Master Plan.

COMMENT 36: At this time, the "No Action" alternative is therefore the only acceptable Preferred Alternative. As I stated in my response to the December 2012 EA, adequate space is available within the Pentagon's parking lots to accommodate an expansion of Arlington National Cemetery that will satisfy the Cemetery's needs for many years. If necessary to adequately defend the Nation, the Secretary of Defense can construct multilevel parking structures to replace any needed surface parking spaces that are allocated to the Cemetery's expansion. The March 2012 EA responded to my comment by stating that the Army is studying new areas for cemetery expansion. The response did not specifically discuss the Pentagon's parking lots as possible locations for this expansion. The response was therefore incomplete and inadequate. The EA therefore needs to fully address this issue before the Army Corps of Engineers proceeds any further with its plans or issues a FONSI.

RESPONSE 36: The Pentagon parking lots are not situated for cemetery expansion considerations. These areas are located on the opposite side of a major highway from the cemetery and their use would not be in keeping with the sacred, honored, and historic context of the remainder of the Cemetery. Such a conversion would also likely be considered an adverse effect to the Pentagon under Section 106. Conversion of existing parking areas to Cemetery usage would require that additional parking spaces for the Pentagon be constructed which would adversely impact the Pentagon, the George Washington Memorial Parkway, and heavily traveled transportation routes.

COMMENT 37: In addition, the EA needs to fully discuss the "No Action" alternative. The discussion should recommend that the Secretary of the Army should ask Congress to repeal the provisions in Public Law 107-107, Section 2863 (h)(1) and (h)(2), thus transferring jurisdiction over the interment zone back to the Secretary of the Interior and removing the requirement that the interment zone be used for belowground burials and columbarium. The discussion should also recommend that the Secretary of the Army ask Congress to require the Secretary of Defense to identify other areas (including the Pentagon's parking lots) that would be suitable for the Cemetery's expansion. Additionally, the discussion should recommend that the Secretary of the Army ask Congress to authorize the Secretary of Defense to transfer jurisdiction of all such suitable properties to the Secretary of the Army, to be used for the future expansion of Arlington National Cemetery. The National Defense Authorization Act for Fiscal Year 2014 or for a future Fiscal Year can contain provisions that will implement the above recommendations.

RESPONSE 37: Do not concur. The EA does discuss the “No Action” Alternative. Public Law 107-107 directed ANC to use the site for expansion and this NEPA analysis has concluded that a suitable alternative has been developed that would not result in significant environmental impact.

COMMENT 38: If the Corps of Engineers does issue a FONSI, the Corps should assure that two large black cherry (*Prunus serotina*) trees (Tag Nos. 1025 and 1026) in Fort Myer are preserved and protected if they are healthy. The Tree Analysis and Inventory in Appendix I of the EA states that these living trees will be removed, that 1025 has a 33 inch diameter and that 1026 has a 41 inch diameter. I have examined these trees, which are near each other and are not far from the Fort Myer wedding chapel. No. 1026 has a diameter that, while not a record, is unusually large for this species in Northern Virginia. An oak has intruded itself into the base of 1026. Although the main trunk of the oak has been cut, the oak is still alive and sending up shoots. The oak needs to be killed to help preserve 1026. Further, both trees are near the site of the former Arlington station of the Fort Myer branch of the Washington, Arlington and Falls Church Railway, which was an electric trolley line that served both Fort Myer and the Cemetery. As there are no large black cherry trees nearby, they may have been planted by the railroad company, which started operations in the 1890's and closed during the Great Depression in the 1930's. Thus, the trees may be historically significant as a remnant of the trolley line.

RESPONSE 38: These two trees are currently slated for removal. Trees are living objects, and as such, are not individually eligible as contributing properties. Expending significant amounts of funding to design around and/or protect individual trees is inefficient in consideration of the natural life expectancy of the trees. The project has been designed to avoid and minimize impacts to large stands of trees, but protection of individual trees is not prudent.

COMMENT 39: A one year old tree does not equate to a 100 year old tree. Killing a 100 year old tree and planting a 1 year old tree = a net loss of 99 years. Taking the average age of the trees slated for removal (killing) x number of trees - average age of replacement trees = the true net loss. I urge the Government to figure out a way to leave at least 30% of the trees slated for removal. New/young trees take years of growth to create the benefits of the canopy the living trees afford to humans and animals.

RESPONSE 39: Concur that a one year old tree does not equate to a 100 year old tree. The number of trees being replanted has increased to nearly 800 trees (1 1/2" to 5" caliper), plus more than 1600 tree seedlings, and 14000 shrubs. Although this may not provide an immediate full mitigation, the landscape ultimately will have a far greater number of native trees, reduction of invasive species, a new and enhanced buffer to the NPS property, and the permanent preservation of green space. The project is being designed and adjusted to avoid and minimize removal of trees to the maximum extent practicable.

COMMENT 40: And where you must remove a tree, you need to establish parameters that replace trees on the basis of the biomass you are removing. By that I mean that you must replace one aged tree with an equivalent amount of trees for that one tree, not just one for one, because it will take decades, perhaps hundreds of years to get to where we are today in terms of the ability to replace the

carbon intake of that old tree by a new one.

RESPONSE 40: See Response #39.

COMMENT 41: I ask that you take a look at the current urban heat island effect in our region, where on any given summer night, the temperature in Arlington exceeds the temperature in the surrounding suburbs by between 12 and 20 degrees Fahrenheit. Removing these old trees will increase that temperature, causing us to increase our electricity usage for cooling our homes even more than already exists, and creating stronger storm events in the future as a result.

RESPONSE 41: The removal of trees as proposed in this project is not of a sufficient quantity to influence climate or local temperatures. The current landscape plan includes planting more than one tree for each removed, thus no net loss. The cumulative impact of many regional development projects (discussed in cumulative effects analysis) has contributed to these issues. Arlington National Cemetery plants 200+ trees every year (totally apart from the Millennium Project) and will replant nearly 800 trees (one gallon sized) and over 1600 tree seedlings as a result of this project, so is therefore providing a benefit to the community in this regard.

COMMENT 42: NTHP - It is apparent to the National Trust and other consulting parties that the proposed Millennium Project would be constructed within a rare surviving section of Arlington House Woods, a historic property which merits careful preservation. However, the interested public may be confused on this critical point because the revised draft EA minimizes the historical significance of the Millennium Project site.

RESPONSE 42: The EA does not minimize the historical significance of the Millennium Project Site – it in fact describes the historic significance in great detail. The areas of the woods listed in the National Register have been clarified in the EA. Thank you for the comment.

COMMENT 43: The proposed Millennium project would be constructed within historic Arlington House Woods, a publicly owned historic property which is listed on the National Register of Historic Places.

RESPONSE 43: The areas of the woods listed in the National Register have been clarified in the EA.

COMMENT 44: After careful review of the revised draft EA, the NTHP recommends that:

- A. The draft Environmental Assessment should be revised to clearly acknowledge that the proposed Millennium Project would be constructed within, and would directly impact, Arlington Woods, the historic setting of Arlington House.
- B. The draft Environmental Assessment should be corrected to expressly state that a 12-acre portion of the 27-acre Millennium Project site is officially listed, and is not merely eligible for listing, on the National Register of Historic Places.

- C. The draft Environmental Assessment should be revised to delete the unsubstantiated finding that the proposed Millennium Project would have no visual effects on the historic setting of National Register-listed Arlington House.
- D. The draft Environmental Assessment should be revised, in the interest of transparency, to inform the public that the Millennium Project would be plainly visible from Arlington House Woods, the historic setting of Arlington House.

RESPONSE 44:

- A. The EA has been revised (Section 5.8.5) to clearly show the areas of the forest contributing to the Arlington House National Register of Historic Places listing. This consists of 20.35 acres, 11.62 under NPS and 8.73 under ANC. The current preferred Millennium design would cut down 2.63 acres of the NRHP contributing forest on ANC land. This is an area of the NRHP contributing forest furthest from Arlington House. The EA cites the Virginia Native Plant Society registry which defines Arlington House Woods as the 12 acres of property administered by the National Park Service. As such, "Arlington Woods" is defined, at least for the purposes of the EA and for clarity, as only the NPS property. However, that does not minimize the historic significance of the project property. This historic significance, and any impacts to this significance, have been identified and resolved through the Section 106 process.
- B. The EA has been revised accordingly.
- C. This has been identified and resolved through the Section 106 process. A viewshed analysis was completed and USACE as well as ANC concurred that no adverse impacts were identified.
- D. The EA has been revised accordingly.

COMMENT 45: Therefore, the National Trust respectfully recommends that:

- A. The design for the proposed Millennium Project should be substantially modified to meet the contours of Section 29, and to eliminate the need for significant earthwork and large cut and fill
- B. The draft Environmental Assessment should be revised to inform the public that Public Law 107-107 mandates that the Millennium Project must be "designed to meet the contours of Section 29."
- C. The draft Environmental Assessment should be expanded to consider and address the impacts to the topography caused by the Millennium Project plan, as designed, including the removal of the historic site's gullies, ravines, and ridges.

RESPONSE 45:

- A. See responses #11, #12, and #24 above. No further design revisions are planned, as the design does meet the contours of Section 29.
- B. The full law citation has been added to the EA.
- C. See Response #4 which states: Text was added to Section 5.8.4.1 to clarify the changes to the historic landscape based on topographical features changes.

COMMENT 46: NTHP: A MOA has been proposed by the Army Corps. The revised EA, however, implies

that the NPS supports the limited mitigation measures and has had a role in proposing an MOA (The National Trust has not proposed an MOA). The NPS is the longtime steward of Arlington House and is a "Cooperating Agency" for the Millennium Project. The National Trust respectfully requests additional clarifying information to understand the National Park Service's involvement, if any, in developing project mitigation measures and in proposing the MOA referenced in the revised draft EA.

RESPONSE 46: The MOA and proposed mitigations were discussed at several Section 106 consulting parties meetings. It was discussed again on Wednesday 17 April 2013 at a consulting parties meeting. The historic resource impacts and mitigations were documented through an MOA between Virginia DHR and ANC.

COMMENT 47: Please schedule more opportunities to talk with neighbors and other interested parties.

RESPONSE 47: Please see Response #6 on the numerous opportunities for public comment. In addition, a public meeting and site visit was held on 16 March 2013 to discuss the project.

COMMENT 48: A primary concern arose during the Site Visit, when only the preferred Millennium Project design was presented and open to discussion. The Revised EA, moreover, essentially summarily dismisses alternative designs that are not only more historically and environmentally sensitive than the preferred design, but are likely to provide more burial sites.

RESPONSE 48: All issues were open to discussion at the site meeting. ANC and USACE staff was available and provided thorough responses to any and all inquiries. A very complete description is provided for the elimination of each of the alternatives in Section 3.9. Criteria for elimination included ability to meet the operational intent of the Cemetery as well as ability to meet the appropriate regulatory requirements.

COMMENT 49: Throughout the Revised EA, references are made to adverse impacts and long term impacts of the Millennium Project preferred design. It is concluded, on the basis of what appears to be little, or, at best, only superficial review, that these impacts are not significant. The acknowledged number and scope of these adverse and long term impacts alone, even without a review of their specific nature, clearly support the need for the additional investigation, review, and analysis that would be provided by conducting, as required by the National Environmental Policy Act and other federal statutes, a more extensive analysis and full Environmental Impact Statement for this project.

RESPONSE 49: Do not concur. The analysis is complete and thorough. Impacts are quantified, and thresholds of significance are defined. Resources are analyzed in relation to those thresholds.

COMMENT 50: Of additional and particular concern to the HALRB are the Seneca Sandstone Boundary Wall and the Arlington House Section 29 forest, both of which are identified in the Revised EA as subject to adverse effects as a result of the Millennium Project. The Seneca Sandstone Boundary Wall, identified as a contributing structure in the National Register of Historic Places nomination, is part of the original

landscape design for the cemetery and was constructed in the 1870s, which is acknowledged on pages 80-81 of the Revised EA. Yet the Millennium Project dismisses the historic significance of the Seneca Sandstone Wall and includes a new boundary wall. The proposed reuse of materials from the demolished historic wall, asserted to mitigate and resolve this “adverse effect to the ANC historic district landscape” 51is, contrary to the proposed Finding of No Significant Impact (FONSI), a very significant impact and requires, at a minimum, the more extensive review provided by an Environmental Impact Statement. The loss of the historic context provided by the Seneca Sandstone Boundary Wall cannot be replaced by simply incorporating salvaged materials into a new relocated wall.

RESPONSE 50: The historic significance of the boundary wall is not dismissed. Its removal in part of the project area is identified as an adverse impact of the project. Documentation is a standard mitigation measure for NRHP properties proposed for demolition or modification. Additionally, proposed mitigation for this impact includes both documentation and the re-use as appropriate. These mitigations were determined through the Section 106 process, which is the appropriate forum for this coordination.

COMMENT 51: In addition to potential adverse effects on the historic resources represented by Arlington House and Arlington Woods, the environmental impact of replacing 732 mature trees with 132 fewer young trees and shrubs requires the analysis afforded by an Environmental Impact Statement.

RESPONSE 51: The number of trees being replanted has increased to nearly 800 trees (1 1/2” to 5” caliper), plus more than 1600 tree seedlings, and 14000 shrubs. The project is being designed and adjusted to avoid and minimize removal of trees to the maximum extent practicable.

COMMENT 52: Alternative F would also provide about 2400 more burial sites than the preferred design. That this alternative would require funeral attendees to walk about 200 to 300 feet to the columbaria does not warrant the apparent failure to consider seriously this more historically and environmentally sensitive approach.

RESPONSE 52: Alternative E has evolved in both the number of burial spaces (which has been reduced due to design refinements and comments received) and the number of trees removed (which has gone through a similar process). If the other Alternatives had gone through this further design development, it is likely that all alternatives would have less burial spaces and a different number of trees removed. It is important to note, however, that neither trees nor burial spaces were the primary criteria considered for alternative elimination. The preferred alternative was chosen as it could best meet the operational intent of the Cemetery, while balancing the protection of historic, cultural, and environmental resources.

COMMENT 53: Then there is the lack of formalized input at the ground level. There are a couple of things absent from the EA report: The exact inventory and cost of replacement trees and shrubs, their long-term maintenance plans, soil impaction, long-term cost comparison between high-impact and low-impact plans, and a survey of veterans’ unique preferences and ideas. Through online comments,

articles, and verbal anecdotes, veterans and area residents have presented alternative ideas like tree dedications, communal burials, and wooded park space for families.

RESPONSE 53: These inputs are well beyond the scope of an Environmental Assessment, and would not generally even be found in an Environmental Impact Statement. The alternative ideas posed above were considered during design charrettes, but the overwhelming direction from stakeholders was to maintain the dignity, honor and respect that is expected from a traditional burial at ANC.

COMMENT 54: Alternative F has 2500 more burial spaces than Alternative E and is the more environmental and cultural resource friendly option. The primary reason given for excluding Alternative F seems to be on the basis of parking and transportation management concerns. While these are, of course, viable and real issues given the primary mission of the cemetery, they are also temporary problems. Today's funeral processions will eventually give way in a short span of years to a more passive use by family members and visitors who come individually to see loved ones long since buried.....Planning for the maximum parking and transportation demands than an area may have at its peak usage does not do as great a service to the needs of the site in the future, nor does it fully take into account the reality that this temporary, through important use, would have immediate, detrimental, and permanent adverse impacts to the recognized historical and cultural landscape.

RESPONSE 54: See response #52 above. The funeral processions of those to be buried at the Millennium site are of the utmost importance and priority. The parking and transportation during active burial years will continue to guide the planning parameters of this project.

COMMENT 55: Section 106 process is ongoing....it seems premature to conclude the EA process at this point without further work among the Section 106 Consulting parties.

RESPONSE 55: The FONSI will not be signed until the MOA is complete.

COMMENT 56: Arlington County... Coordination with ANC Master Plan & Design Guidelines...We appreciate the feedback from the first Draft EA on our comments related to the compatibility between the design of the Millennium Project and the ANC's Draft Cemetery Design Guide. However, we are reiterating the same comments below in order to generate a specific response about how each of the design issues can, or cannot, be addressed per the recommendations of the Design Guide:

1. Existing trees and vegetation should be preserved and nurtured in order to maintain the mature, protected feel of this part of the cemetery.
2. Site Planning Standards: 1. Preserve natural site features such as topography, hydrology, vegetation, and tree cover. 3. Preserve the natural site by molding development to fill around existing land forms and features. This development approach minimizes extensive earthwork, preserves existing drainage patterns and preserves existing vegetation. 4. Plan for facilities to be clustered to preserve land, reduce construction and maintain as much permeable surface area as possible.

3. Natural Site Conditions, Topography. 1. Maintain natural ground slopes and elevations. 5. Avoid development on steep slopes. 6. Avoid development in natural drainage ways and flood plains. Hydrology - Limit development in floodplains to open spaces and ceremonial uses. Vegetation – The cemetery will be designed to protect and preserve existing native vegetation.
4. The long perimeter columbarium wall is more suited to the formal theme discussed in the Design Guidelines. The Design Guidelines also note the liabilities of this design, stating that the “columbarium area can feel forbidding to some” and that the “niche walls lack architectural articulation” (p 43). The Design Guidelines go further and state that “if new niche walls are built, they should be offset (or court-like) to create a more human scale. One long straight wall is not recommended.

RESPONSE 56: As stated in our response to the draft EA comment, several comments were discussed at a meeting between Arlington County, Millennium Project Team Members from Norfolk USACE and ANC, and other Section 106 consulting parties regarding the desire for greater coordination between the draft Master Plan Cemetery Design Guide (CDG) and the Millennium Project, which is preceding the final master plan and its guidelines. The group was informed that the CDG was not yet begun when the concept designs of the Millennium Project were developed. Since that point each is informing the other as they are being developed or further developed concurrently. Although there are some discrepancies, there are also many consistencies. In response to the specific points above, the site conditions were the controlling factors in the project planning. The site has many trees and steep topography. The design team did endeavor to work within these parameters to the maximum extent practicable. The Cemetery Design Guide is an internal planning document. It is not a law or regulation, nor should it be implied that it is a binding agreement. The Millennium Project did follow the guidelines above where possible, and these guidelines did serve to inform the final design.

COMMENT 57: We suggest consideration of a Transportation Demand Management (TDM) plan to minimize the number of private vehicles that drive to the project area. One option could be a shuttle service to transport funeral participants to and from the ceremony site. An effective TDM strategy could substantially reduce the need to accommodate large numbers of private vehicles with the project design, reducing the amount of pavement created and the overall disturbance in the stream valley.

RESPONSE 57: Do not concur. The suggested traffic demand plan is not feasible as it would not afford families the privacy, serenity, comfort and convenience that would be reasonably expected during a funeral service or a visit to lost loved ones.

COMMENT 58: We understand that the design team is aware of the erroneous references in Table 1 on page 47-48 to all of the other alternatives not meeting the Chesapeake Bay Preservation Act standards. Clearly, this is not the case for the alternatives with less impact to the stream valley, and this information should be corrected and clarified to the public as soon as possible.

RESPONSE 58: This information in Section 3.9 has been updated and clarified. Thank you for the comment. Alternative F and Alternative C no longer list Chesapeake Bay Preservation Acts as criteria for

elimination. Alternative D would likely have significant concerns under the Act, given its greater encroachment into the RPA as well as its greater direct impacts to linear feet of perennial stream. The discussion of these factors has been improved.

COMMENT 59: The other environmental benefits associated with the Preferred Alternative are not unique to that design but instead could be incorporated with the alternatives that have fewer stream valley impacts – and with potentially greater benefit because more stream valley is preserved with these alternatives.

RESPONSE 59: Only Alternative E can meet all of the operational demands of cemetery.

COMMENT 60: Invasive plant control efforts should be expanded as a mitigation effort for the project.

RESPONSE 60: The project already includes an extensive invasive control plan, which has been expanded throughout the NEPA process as a result of comments. See the response to comment #31.

COMMENT 61: The draft EA makes much of the fact that so many of the trees targeted for removal are slightly less than 150 years old. This should be strong reason to preserve them, not to belittle them and cut them down.

RESPONSE 61: The trees are not belittled. Impacts to the forested area have been avoided, minimized and mitigated to the maximum extent practicable.

COMMENT 62: The current Proposed Alternative would remove 1,000 trees and dramatically alter the topography of a 27 acre stream valley. Given the magnitude of this proposed project, we do not believe the current Environmental Assessment for the Millennium Project sufficiently considers all the environmental impacts of this project. We therefore request that the Corps complete a full Environmental Impact Statement to ensure the full suite of ecological issues is appropriately addressed.

RESPONSE 62: Please see response #12 above. Do not concur. The analysis is complete and thorough. Impacts are quantified, and thresholds of significance are defined. Resources are analyzed in relation to those thresholds.

COMMENT 63: For example, as a part of the EA, the document had to consider compliance with the Chesapeake Bay Preservation Act, which is intended to address the impact land use has on waters that feed into the Chesapeake Bay. Under the current EA, Alternative F does not appear to cross the stream bed or encroach on it. Alternative E clearly would by building a road on top of a previously untouched section of the stream bed. The Preferred Alternative creates more impervious surface than Alternative F. This will result in great amounts of polluted run-off during rains storms. Based on these facts, we are unclear how Alternative F does not meet the standards established by the Chesapeake Bay Preservation Act but the Preferred Alternative does. We would like the Corps to provide additional analysis and justification to provide a clear rationale for these conclusions.

RESPONSE 63: The EA has been clarified to remove Chesapeake Bay Preservation Act as Criteria for removal for Alternative F and C. See response #58 above. The proposed Alternative provides SWM/BMPs, including stream restoration, that achieve the no net increase of pollutant loadings from this project.

COMMENT 64: I object to Alternative E of the planned expansion known as the Millennium Project and ask you to consider additional alternatives. Alternative E would impact 31% of the area under study containing trees 145 to 165 years old. This is a tremendous loss of older forest in order to extend the viability of the cemetery for only 4-6 years. In addition this area is a critical buffer zone for an even older forested area. Its elimination will endanger that forest, the last old growth forest in Northern Virginia that is over two centuries old.

RESPONSE 64: See responses #1 and #8 above.

COMMENT 65: The impact of the projects on African-American cultural resources (including those of the Civil War period, and pre- and post-Civil War periods) should have been fully analyzed. These resources should be protected for posterity. The agency should protect the qualities that led to the listing in the NRHP (see also above). The agency should disclose whether any of its activities could cause all or part of the site to lose its NRHP status.

RESPONSE 65: The entire Millennium Site will become part of the ANC historic district (currently undergoing the nomination process for the NRHP) once burials begin. So the site will not lose its status, but its identity would change from contributing to Arlington House to contributing to ANC. None of the proposed designs for Millennium, including those with greater adverse effects to the forest contributing to Arlington House, would have possibly threatened the NRHP listing of Arlington House, ANC, for the Fort Myer historic district. All cultural and historic resources were identified and analyzed as part of the Section 106 process.

COMMENT 66: The agency should have disclosed whether effects of the proposed activities on the NRHP would be permanent or long-term in nature and warrant an Environmental Impact Statement due to their controversial nature or significant impacts to the human environment.

RESPONSE 66: See response #66 above. As all adverse impacts to cultural and historic resources have been resolved through the Section 106 process, an EIS (as discussed above) is not warranted.

COMMENT 67: The agency's brief dismissal of the issue of fragmentation is wholly inadequate (i.e., "the project site is an urban, partially forested site located away from the main body of the existing urban forest so forest fragmentation is minimized. The eastern half of the site on ANC property is heavily forested with dense mature tree growth and this would be retained." EA 114). The degree to which the forested areas would be fragmented, the extent of edge effects, and the impacts on species that depend

on forest interior habitat and mature forest interior habitat is not explored. Moreover, cumulative effects and the role of the Arlington Woods and surrounding Section 29 mature/old growth forests are not analyzed. The full, multidisciplinary analysis required by NEPA has not been performed.

RESPONSE 67: Do not concur. Fragmentation is discussed and identified. The level of analysis is appropriate for an EA and appropriate for this project.

COMMENT 68: The use of the most up-to-date information available needs to be the base for all management decisions — landscape ecology and conservation biology need to be considered. The agency needs to explore the role of the forested areas of Section 29 as a unique island of habitat in the midst of the heavily fragmented Northern Virginia and National Capital Region.

RESPONSE 68: Thank you for your comment. The analysis provided is thorough and complete, and appropriate for this project. Fragmentation of forest areas as well as the urbanization of the region have been discussed in the EA.

COMMENT 69: Alternative E would eliminate important wooded habitat for neo-tropical migratory birds in Northern Virginia and the National Capital Region, an area that is otherwise highly developed and urbanized. The EA does not analyze the degree of precariousness of bird populations in the forested areas of Section 29, does not incorporate adequate monitoring of existing bird species in the area, and does not fully analyze the impact of the project on bird species or bird habitat for area-sensitive birds.

RESPONSE 69: Thank you for your comment. The analysis provided is thorough and complete, and appropriate for this project. The remaining forested area will provide appropriate habitat for displaced birds.

COMMENT 70: The cerulean warbler, is an area-sensitive bird (Southern Appalachian Assessment, Terrestrial Report); the cerulean warbler is experiencing the greatest annual decline of any of the warbler species and this significant decline is continuing. Studies have found cerulean warblers chiefly in “large tracts of mature, semi-open deciduous forest.” Robbins, Fitzpatrick and Hamel, 1992. The authors of one study, affirm that there is a “need to protect extensive tracts of mature deciduous forest,” especially on publicly owned land. This project has the potential to alter or degrade these habitat characteristics in the project area removal of large, old trees that are potential cerulean warbler nest trees in the course of thinning operations, and through other actions.

RESPONSE 70: Thank you for your comment. The analysis provided is thorough and complete, and appropriate for this project. The remaining forested area will provide appropriate habitat for displaced birds.

COMMENT 71: Negative impacts from deer - What effect this project will have on the existing deer herd is an issue here.

RESPONSE 71: Deer are not a uniquely protected species. They are in fact known to thrive in edge environments. Potential impacts to the deer are noted, but not considered significant.

COMMENT 72: Impacts to Salamanders - Impacts to site-sensitive creatures such as salamanders are not being properly monitored and assessed. These creatures are vitally significant components of forest ecosystems.

RESPONSE 72: Salamanders are not a uniquely protected species. Potential impacts to the salamanders are noted, but not considered significant.

COMMENT 73: Old Growth - The agency should protect all existing old growth forest and adjacent mature forest tracts.

RESPONSE 73: No true old-growth will be removed. The adjacent mature forest tracts have been protected to the maximum extent practicable.

COMMENT 74: The EA's concept of old growth is deficient in at least three different ways.

- (1) It conflates primary forests (forests that "have never been logged") with old growth.
- (2) It would eliminate otherwise qualifying stands of older forest because of "invasive species invasion."
- (3) It doesn't accept the concept that some forest tracts may be in the process of developing old growth characteristics (or soon could be) over time. With old growth forests and forest interior habitat in such short supply in Northern Virginia and the National Capital Region, the agency should prioritize the protection of all late successional forest tracts adjacent (or near) old growth tracts.

RESPONSE 74: The definition is based on current literature and research on the topic. Concur that no one parameter should define a stand, but the list of characteristics should be considered.

COMMENT 75: The agency has not surveyed existing old growth habitat and late successional habitat in the area. The agency has not even provided full acreage figures for old growth, late successional, early successional, and areas with/without edge effect for the area. Proper NEPA analysis has not been conducted. After all, this is an area with a highly significant historical old growth forest tract.

RESPONSE 75: Thorough investigations were completed of the project site, to include a complete and comprehensive tree survey, a full vegetation survey, and site visits to determine ages of representative trees. This is above and beyond the necessary surveys for NEPA analysis.

COMMENT 76: Lack of Adequate Surveys for Biological Resources - Adequate surveys for wildlife, plants, and aquatic species have not been conducted. However, Wildlife Habitat Surveys (and Water Habitat Surveys) for the project either took place many years ago or took place over a few days in

February – in the dead of winter. (EA Appendices). Biological surveys should be conducted when species can be detected.

RESPONSE 76: The surveys from prior years were requested for inclusion by many commenting agencies on the December 2012 draft EA. The new surveys were requested by commenters and completed, and do provide sufficient information for decision making purposes. The combination of this information provides a complete picture of the existing conditions.

COMMENT 77: The EA states that invasive species are already a problem in the area. The analysis does not consider the degree to which this project could worsen the problem in Section 29 and surrounding areas.

RESPONSE 77: ANC has an invasive species management program which would endeavor to minimize invasive species infestation. In addition, the construction project will include a multiple year invasive species control plan.

COMMENT 78: The agency should address the potential spread of invasives from the activities contemplated in the EA. I feel that the introduction and spread of invasives are some of the greatest threats to our public lands, especially in an urban area such as this. In addition to addressing current weed infestations foreseeable, the agency should be focused on stemming the increasing infestation and spread of noxious weeds in the project area. The agency should include measures to limit future ground disturbing and weed spreading activities. The NEPA document should examine and address the most prevalent ways that soil disturbances are created which lead to weed invasions. This should be recognized in terms of costs to the taxpayer, impacts on biodiversity, and the likely need for doing even more invasives control in the future. It makes absolutely no sense to analyze controlling weed invasions that exist now without taking a full and honest look at how to prevent new sites from being invaded. While limiting future land disturbance should be the foremost priority, prevention measures associated with land disturbing activities that do occur should also be outlined in the NEPA document. The past effectiveness of the proposed prevention activities should be discussed.

RESPONSE 78: A discussion on the spread of invasives was added to Section 5.6.5.

COMMENT 79: The NEPA document must meet NEPA's requirements that a reasonable range of alternatives be fully analyzed.

RESPONSE 79: The NEPA document does discuss a reasonable range of alternatives, to include both early concepts eliminated from further evaluation as well as the "final array of alternatives". The reasoning for not including additional alternatives that were mentioned in comments has been discussed in this comment/response document and a discussion added to the Final EA.

COMMENT 80: Only 738 acres, 4.7% of Arlington's total land area, could be considered to fall under the "natural area" category. In 2010 Arlington committed in its Natural Resources Management Plan to a

“no net loss” policy for its remaining natural areas. While Arlington County does not administer Federal lands such as ANC, we believe that respect should be given to the no-net-loss policy and recognition afforded that the Millennium Project as currently designed would destroy a significant part of Arlington’s very limited remaining natural area.

RESPONSE 80: Actually, the project will largely be green space for perpetuity, contributing many of the same environmental benefits as a natural area. There will be large areas of grass, many trees, as well as a restored stream. This is not the destruction of a natural area.

COMMENT 81: I would also note that, at the March 16 Open House that ANC conducted, colleagues and I were struck by the large number of native birds we observed in the project area. Clearly, the woods that would be destroyed are important bird habitat, and removing the large number of trees would have negative impacts that could violate the Migratory Bird Treaty Act.

RESPONSE 81: The vast majority of forested area on and adjacent to the site will remain undisturbed, with sufficient available trees for habitat. The project is in compliance with the MBTA.

COMMENT 82: My review of publicly available aerial imagery indicates that the adjacent Fort Myer property appears to have substantial areas that are topographically well-suited for gravesites, already disturbed (low remaining natural resource value), and potentially amenable to being made available for burials. ANC should explore creative options to re-purpose some of these Fort Myer areas, just as the former Naval Annex is being converted.

RESPONSE 82: Ft. Myer is currently not available for burials. It is an active military installation.

COMMENT 83: Moving the loop road to the west will help resolve both of these issues. I would suggest eliminating the Columbarium on the return portion of the Loop Road so that the return loop could be situated in the space where that Columbarium was to be placed. This would place the return portion of the Loop Road lower on the slope and would allow for a more appropriate backdrop of trees. This change would also eliminate the need for as high a retaining wall for the return road. Doing this would result in a considerable reduction in cost and as importantly in the amount of built infrastructure. The other Columbaria planned for the site could be enlarged to compensate for lost inurnment space.

RESPONSE 83: The size and design of all Columbarium have been developed in accordance with guidance from the CFA and current cemetery practices. In addition, bringing the road closer to the stream would have ramifications to the RPA.

COMMENT 84: Both the process and the product for this proposal are seriously flawed. As currently designed, the project unnecessarily puts into conflict the shared and deeply held values of properly recognizing our veterans; protecting unique historical and ecological resources, and; abiding by the law. Because the process was rushed and did not adequately consider alternate views, the resulting product violates the public trust and threatens irreplaceable resources.

RESPONSE 84: Do not concur. The project team, in fact, has diligently balanced these often-competing goals and resources. As cited above, the NEPA analysis has been shared with the public twice and has undergone many revisions and adjustments as a result of this process.

COMMENT 85: Consider walking along a three story retaining wall for most of a mile; would the land seem minimally disturbed or would it feel like a bridge abutment, a highway overpass.

RESPONSE 85: See response to comments #24, 10, and 11 on the size and location of retaining walls.

COMMENT 86: Why destroy the land, ancient trees and a Virginia Native Plant Registry site when that can be avoided?

RESPONSE 86: The Virginia Native Plant Registry site will incur no direct significant adverse impacts. The VNPR site is entirely on NPS-administered property which is adjacent to the primary project footprint.

COMMENT 87: Likewise, the EA notes that “NEPA requires consideration of both context and intensity.” Significance of impacts is determined by examining both the context and intensity of the proposed action. Historically, the 12 acres transferred to DOD is considered to be a part of Arlington House Woods and is listed on the National Register of Historic Places and the remaining section is listed as a Virginia Native Plant Society Registry Site. In this project, both context and intensity are significant, and yet the EA fails to follow the NEPA regulations and purports to make a “finding of no significant impact” (FONSI).

RESPONSE 87: The NRHP listing has been addressed and resolved through the Section 106 process and see response #22 for correct acreage of NRHP contributing forest. The listing on the Virginia native Plant Society Registry does not create significance, and in addition, that site will only incur minimal and indirect impacts as it is adjacent to the main project site.

COMMENT 88: Environmental assessments have yet to put a value on the spiritual loss that would occur as a result of this proposal.

RESPONSE 88: On the contrary, it is the deeply held belief of the project team that this project will lead to a very spiritual area, worthy of inclusion at Arlington National Cemetery.

COMMENT 89: The geological study included in the revised EA identifies a seep in the project area (EA p. 64). Seeps around the county support unique assemblages of plant and animal species. A redesign of the loop road could avoid construction in the vicinity of the seep.

RESPONSE 89: There is not a seep in the project area (and page 64 does not describe a seep). There is one spring for which the design has been adjusted to minimize impacts to the spring.

COMMENT 90: The Corps EA commits to construct stormwater management measures to compensate for increases in the quantity and degraded water quality of run off; such mitigation is fundamental to mitigate significant impacts to local and Chesapeake Bay water quality. Arlington County has been making significant investments in ensuring careful site designs, enhancing storm water management, and advancing wastewater treatment to improve local and Chesapeake Bay water quality. Therefore, we note with considerable concern, that the EA concluded that none of the project alternatives fully met Chesapeake Bay Preservation criteria.

RESPONSE 90: The EA did NOT conclude that none of the project alternatives fully met Chesapeake Bay Preservation requirements. The EA noted that Alternative E would meet the Chesapeake Bay Preservation Act's requirements, and has been updated to state that C and F would likely meet the Act also. Alternative E will continue to be coordinated with the appropriate agencies in order to ensure compliance.

COMMENT 91: In any urban environment, the opportunity for residents and visitors to experience true old growth forestland is a rare and rewarding opportunity. For many of the 4.5 million annual visitors to Arlington National Cemetery, this is a once in a lifetime opportunity to see a magnificent forest that is very much like the one that George Washington Parke Custis and Robert E. Lee gazed upon as they held this sacred land.

RESPONSE 91: Good comment. The majority of that forest will remain for visitors to visit and appreciate.

COMMENT 92: Finally, the environmental assessment fails to include an evaluation of the contribution of the forestlands to feelings of solace and peace-of-mind that are known to aid spiritual health and well-being to any cemetery visitor. I heard there is an idea to build another Arlington-like cemetery or an annex...that may or may not be viable, don't know. You ought to study that.

RESPONSE 92: The ANC Master Plan will consider long-term options for expansion. Section 5.16 does review "visitor use and experience." A statement was added to reflect this comment.

COMMENT 93: New tree plantings will never replace the intact forest ecosystem that currently exists--this fact is undeniable.

RESPONSE 93: See response #39.

COMMENT 95: Furthermore the trees are currently being used by a pair of nesting hawks which we clearly saw at the open house Saturday, March 16th. The hawks and many species of birds within the proposed Millennium site have protection by law under the Migratory Bird Act. The EA claims that no eagles nest within the woods however a mated pair was seen flying directly overhead on several

occasions. Owls very clearly were heard in the woods on another occasion and conveniently there is no mention of owls in the EA.

RESPONSE 95: The vast majority of forested area on and adjacent to the site will remain undisturbed, with sufficient available trees for habitat. The project is in compliance with the MBTA. Only birds recorded during wildlife surveys were included in the EA.

COMMENT 96: Construction will either kill or drive the wildlife out of the forest. The constant firing of weapons, vehicle traffic and human presence will prevent the wildlife from returning to claim their ancient homes.

RESPONSE 96: The noises mentioned above are common at ANC and the wildlife currently exists with that adjacent disturbance. There is no reason to think this would be any different after the construction of the project.

COMMENT 97: The Millennium Project would kick start the systematic destruction of the last old growth forest in Northern Virginia.

RESPONSE 97: There are no plans to convert any of the remaining forested areas into burial space.

COMMENT 98: If the loop road was re-designed, the retention wall and one columbaria were removed from the steep ravine above the stream, the 165 year forest could be saved.

RESPONSE 98: No trees from the 165 year old forest are currently slated for removal. See response 16 above for loop road re-design response.

COMMENT 99: I suggest the ANC begin accepting only cremations and making use the space available. How about adding masoleums? As unsavory as this may seem, has anyone ever considered how much embalming fluids are and will leach into the Chesapeake water system from the ANC? It time to plan for the future and stop putting more into the ground.

RESPONSE 99: The ANC Master Plan, currently under development, is considering alternative burial methods. However, there is still great demand and request for both traditional casket burials and in-ground cremains burials. The concern regarding the embalming fluid has been noted, but at this time the laws of Virginia mandate certain procedures for embalming for which all cemeteries must comply.

COMMENT 100: If 23 more trees are to be cut, where is that?

RESPONSE 100: The identification of 23 additional trees to be cut was a result of refinements to the tree survey and are located throughout the site, in areas previously identified to be impacted.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

APR 11 2013

Mrs. Susan Conner
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Re: Environmental Assessment for the Arlington National Cemetery Millennium Project, March 2013

Dear Mrs. Conner:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Environmental Assessment (EA) for the Arlington National Cemetery (ANC) Millennium Project.

EPA greatly appreciates efforts made by the U. S. Army Corps of Engineers to coordinate and address agency comments. EPA recognizes that many changes and additional information and analysis have been added to address concerns expressed in our January 22, 2013 letter. These efforts and additions have improved the EA for this project and greatly added to the clarity and breadth of the document.

Thank you for providing EPA with the opportunity to review this project. We encourage the project team to continue to avoid and minimize impacts as the project continues through the process. The staff contact for this project is Ms. Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Rudnick", is written above the typed name.

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs



COMMONWEALTH of VIRGINIA

Douglas W. Domenech
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

1 April 2013

Ms Susan L. Conner
Department of the Army
Norfolk District Corps of Engineers
Fort Norfolk 803 Front Street
Norfolk, Virginia 23510-1096

RE: Environmental Assessment for the Arlington National Cemetery Millennium Project
Arlington County, Virginia
DHR File No. 2008-1022

Dear Conner:

The Department of Historic Resources (DHR) has received for review the Environmental Assessment (EA) prepared by the U.S. Army Corps of Engineers-Norfolk District (Corps) for the above referenced project. The EA includes a No-Action Alternative and six Action Alternatives, one of which, Alternative E, is identified as the Proposed Alternative and was studied further in the document.

As you are aware, Arlington National Cemetery (ANC) and the Corps have been in consultation with DHR and other consulting parties concerning this undertaking pursuant to Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800. This consultation has included a series of consulting parties meetings that we believe have been beneficial from the standpoint of understanding the project scope, as well as working through a variety of issues pertaining to historic properties and the potential for the Millennium Project to impact them. The DHR wants to commend ANC and the Corps for their willingness to work with us and the other consulting parties in order to minimize, to the extent possible, adverse effects to the identified resources within the project Area of Potential Effects (APE). We also want to acknowledge the need for ANC to expand the existing burial space at the cemetery to provide dignified final resting places for the nation's military veterans. It is DHR's goal to help

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Ave.
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Tel: (804) 367-2323
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Tidewater Region Office
14415 Old Courthouse Way
2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
P.O. Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

ANC during the Section 106/National Environmental Policy Act (NEPA) review processes so it may continue its solemn mission of honoring our fallen heroes far into the future. Please accept our following comments on the EA in the spirit of cooperation and assistance in which they are intended.

It appears that the site plan sketch design for the Proposed Alternative (Alternative E) illustrated in Figure 2, page 25, Figure 3, page 26, and elsewhere in the EA does not reflect the most updated version of the design that was shown to the consulting parties at our 11 March 2013 meeting. At that meeting we were shown a revised design that moved some of the columbaria along the southern part of the Loop Road to the northern section, which allowed for the Loop Road to be made smaller. This redesign resulted in the retention of additional large trees. The new plan met with universal approval from the consulting parties and it is unclear why it is not reflected in the current document.

When assessing effects of the Millennium Project construction on the cultural landscape (Section 4.8.3) the EA tends to focus on the number of older growth trees that the undertaking will remove. Although this is a legitimate concern due to the acknowledged National Register of Historic Places eligibility of the forested area, the trees are only one aspect of the landscape that must be considered and addressed. The natural landscape that will be impacted also consists of other features such as gullies, ravines, ridges, etc. The EA document should also evaluate the removal of these topographical features when discussing effects to the historic landscape.

It is our understanding from discussions held during the 11 March consulting parties meeting that there will be an update to the viewshed study. It was decided that the revised viewshed study will analyze two additional views; one from Fort Myer along Marshall Drive and one from further inside the woods which will remain on National Park Service property. To our knowledge the revised viewshed study has not been completed, nor do the results appear to be reflected in the EA.

With respect to the Action Alternatives studied in the EA, the individual cases for excluding Alternatives A through D seem well reasoned. The document explains, to varying degrees and detail, why these alternatives were eliminated from further study due to either their unacceptable impacts to the environment and/or because they did not meet the functional requirements expected from ANC. However, DHR believes the rationale for why Alternative F was not brought forward for additional consideration is less well articulated. Compared with the Proposed Alternative (Alternative E), Alternative F provides more burial spaces (32,350 versus 29,922) and appears, from looking at the footprints of the two designs; to have less of a direct impact on the historic landscape than does the Proposed Alternative. This latter point, however, is partially contradicted by the numbers given in the EA for tree removals; 882 for the Proposed Alternative and "approximately 987" for Alternative F. To us this seems counter intuitive considering the greater

Page 3
1 April 2013
Ms Susan L. Conner

amount of roadway included in the Proposed Alternative. The DHR requests that the Corps please confirm the numbers of tree removals for the Proposed Alternative and Alternative F.

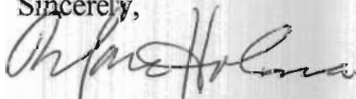
The DHR would also like clarification on how Alternative F does not meet the standards established by the Chesapeake Bay Preservation Act. If we understand the plan correctly, Alternative F does not cross the streambed or encroach upon it, as does the Proposed Alternative. The Proposed Alternative also appears to create more impermeable surfaces than does Alternative F, yet the EA notes no conflict with the Chesapeake Bay Preservation Act resulting from the preferred Alternative E. The discussion found on page 54 addressing why Alternative F was ruled out for further study due to impacts to the environment (Criteria 2) does not, in DHR's opinion, adequately explain this position. We request that ANC and the Corps provide more detail to bolster the argument and explain why Alternative F does not meet the standards of the Chesapeake Bay Preservation Act and the Proposed Alternative does.

Along with the above questions lingering regarding elimination of Alternative F due to environmental impact considerations, we understand that this alternative was also discounted because it will not meet the "minimum operational intent for vehicular traffic flow, ceremonial procession requirements, and parking along the road" (Table 1, page 48). This is elaborated upon on pages 53 and 54, which summarizes the situation as a potential lack of parking space for funeral attendees at the committal service shelter. Although this may be a legitimate issue, this situation exists elsewhere at the cemetery and internment ceremonies are largely not affected. The DHR believes that any major inadequacies due to parking and traffic flow can be addressed through design revisions to include possible relocation of the committal service shelter to a more centralized spot.

The DHR would expect that ANC and the Corps would address the issues and questions raised above in a subsequent draft of the EA, however, considering the aggressive project timeline we understand if this is not be the case. If ANC and the Corps do not plan on further revisions to the EA please respond to our above comments during the ongoing Section 106 process.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,



Marc Holma, Architectural Historian
Office of Review and Compliance

C: Mr. Daniel Delahaye, Arlington National Cemetery
Ms Rebecca Ballo, County of Arlington
Ms Kristie Lalire, Fort Myer
Mr. Robert Nieweg, National Trust for Historic Preservation
Mr. Matthew Virta, National Park Service

From: mcampbell1419@comcast.net
To: [Conner, Susan L. NAO](#)
Subject: A Request
Date: Friday, March 15, 2013 10:22:10 PM

Dear Mrs. Conner,

Please so not expand Arlington Cemetery into Arlington Woodlands, an old-growth forest. There is nothing on earth better then old growth forests to produce oxygen, clean water, sequester Co2, prevent erosion and influence climate. Intact old growth forest in the eastern Untied States is currently at only .06 percent.

Please preserve this wonderful woodland area in Arlington.

Thank you.

Mary Campbell

Arlington, VA 22201

From: [Scott Sklar](#)
To: [Conner, Susan L. NAO](#)
Subject: Additional comment - Middle Ground Proposal - Scott Sklar, AHCA
Date: Monday, March 25, 2013 10:33:11 AM

I am writing again on behalf of the Ashton Heights Civic Association, and we have five other Arlington civic associations signed-on to our position. We propose trying to strike the middle ground. Our proposal is below. - Scott Sklar, President, AHCA Home: 703-522-3049 solarsklar@aol.com

Home address: 706 North Ivy Street, Arlington, VA 22201

It is still possible to get design changes made to the Arlington National Cemetery Millennium project, which allow both cemetery expansion and saving the old forest.

If the loop road was re-designed, the retention wall and one columbaria were removed from the steep ravine above the stream, the 165 year forest could be saved.

The "new" redesigned loop road could connect Humphreys Rd (skirting around the edge of the woodlands and behind the Old Post Chapel) to the planned Millennium Rd which (in the design) already connects to Ord and Weitzel. One Columbaria would be eliminated but the other three could be made larger to make up for the lost capacity in the forest.

This is a viable alternative. The Army Corps of Engineers can and should change the design which is at 65% right now. This change respects America's sons and daughters who have sacrificed and served their country and the living forest and the nearby neighborhoods who have already lost nearly 1000 trees from development and VDOT construction.

From: [Michael Polovina](#)
To: [Conner, Susan L. NAO](#)
Subject: ANC expansion
Date: Friday, March 15, 2013 7:54:51 PM

Dear Mrs. Conner,

Please ask the ANC to reconsider killing off the old growth trees in the cemetery. Once this is done, it is done forever. I suggest the ANC begin accepting only cremations and making use of the space available. How about adding mausoleums?

As unsavory as this may seem, has anyone ever considered how much embalming fluids are and will leach into the Chesapeake water system from the ANC? It's time to plan for the future and stop putting more into the ground.

Certainly our honored dead deserve to be treated with respect. So does our honored living with historical green coverage.

Thank you,
Michael Polovina
Arlington, Va.

From: [Jo Dickison](#)
To: [Conner, Susan L. NAO](#)
Cc: [Jo Dickison](#)
Subject: ANC Millenium project
Date: Wednesday, March 27, 2013 8:32:48 AM

Susan L Conner

USACE, Norfolk District

Re: ANC Millennium Project Environmental Assessment

Dear Ms. Conner,

As an Arlington county resident I am writing to express concern with the ANC Millennium Project plan as described in the revised Environmental Assessment document on the ANC website. While there is clearly a need for the cemetery to expand and also for stream restoration, erosion control and invasive species control, I am concerned that the plan involves removing over 750 healthy native trees, many of which are over one hundred years old. I hope the plan can be amended to incorporate more of the existing trees so they will not be lost. I am also concerned that the construction and heavy equipment quite close to Arlington Woods could damage the older, precious trees there. As the Navy Annex land swap will probably be finalized in the next few years, is it possible to use that land for the cemetery expansion later and proceed with the stream restoration, invasive species removal and dead tree removal in the Millenium area without removing hundreds of healthy old trees?

Sincerely,

Jo Dickison

Pershing Drive

Arlington, VA

From: stevecampbell@verizon.net
To: [Conner, Susan L. NAO](#)
Cc: Manica_Noziglia@warner.senate.gov; Amanda_Chuzi@kaine.senate.gov; Tim.Aiken@mail.house.gov
Subject: ANC Millenium Project
Date: Thursday, April 11, 2013 6:21:41 PM

Ms. Susan L. Conner
U.S. Army Corps of Engineers- Norfolk District
Norfolk, VA

Re: Arlington National Cemetery Millenium Project

Ms. Conner,

I am writing with serious concerns about aspects of the Millenium Project plan. Although in some form this project will be built to honor our veterans, I and others suggest certain changes should be made so the final outcome is the best it can possibly be. While the Department of the Army, the Corps of Engineers, and Arlington National Cemetery are pressing to finalize this process, there is clearly enough time to weigh all good options.

Because of the many valid questions about the value of the natural resources at risk are being raised, the Environmental Assessment should be reviewed to verify whether an Environmental Impact Study should still be undertaken. I only mention this and the NEPA issue since others with more knowledge than me have already raised them.

Three points I would like to emphasize:

-The current plan has too much planned infrastructure, and as a result is not at all in keeping with the character of the historical areas of the Cemetery.

This is a serious flaw in the design concept.

-As now planned, the return portion of the loop road cuts deeply into the slope, requiring the construction of a very tall retaining wall, leaving little room above that for any trees to serve as an adequate backdrop to the overall setting. A thin strip of trees, perhaps only 30 feet wide, is now planned and is insufficient.

-Moving the loop road to the west will help resolve both of these issues. I would suggest eliminating the Columbarium on the return portion of the Loop Road so that the return loop could be situated in the space where that Columbarium was to be placed. This would place the return portion of the Loop Road lower on the slope and would allow for a more appropriate backdrop of trees. This change would also eliminate the need for as high a retaining wall for the return road. Doing this would result in a considerable reduction in cost and as importantly in the amount of built infrastructure. The other Columbaria planned for the site could be enlarged to compensate for lost inurnment space.

Environmentally the best solution would be to entirely move the Loop Road to the west side of the stream. If space restrictions and topography make this an unacceptable option I believe the option I suggest above is worth considering.

Finally, in the handout given us attendees at your March 16th open house (Project Benefits page), the sketch of the two inward-facing Columbaria along the stream appears very misleading to me, as one tall retaining wall which is shown in the cross-section (on the same page) is not shown in the sketch itself.

I live less than 300 yards from Arlington National Cemetery, and have volunteered hundreds of hours at Fort Myer the last few years. I respect and appreciate your and Colonel Bruzese's professionalism and thank you both for the opportunity for the concerned public to comment on this process. Please give serious consideration to suggestions offered in good faith.

Sincerely,
Steve Campbell

1410-B N. 12th St
Arlington, VA 22209
April 10, 2013

cc: Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran

From: [Dowling Nancy](#)
To: [Conner, Susan L. NAO](#); [Amanda Chuzi@kaine.senate.gov](#); [Manica Noziglia@warner.senate.gov](#); [Tim.Aiken@mail.house.gov](#)
Subject: ANC Tree Removal
Date: Sunday, April 14, 2013 9:17:37 AM

Senator Warner, Congressman Moran, and Ms. Conner,

I am concerned that the revised ANC expansion plan now includes removal of more trees, rather than less. I understand that your new plan also includes the planting of new trees, but surely you are aware that planting a new, younger tree is not equal to the environmental value of old, noble trees of many decades. Here in Arlington, Virginia, we have slowly become an urban environment, suffering from various conditions that exist in all US urban cities: pollution, crime, traffic congestion and its related smog, etc. We have more orange days now than we have ever experienced before, and this has caused a spike in respiratory illnesses and lung cancers in our area.

I can sympathize and agree that the ANC needs to expand to make room for more graves for our fallen heroes. I am a retiree who worked for the Navy and Defense Departments for over 30 years. I wholeheartedly agree that these men and women deserve that respect and honor, but at the same time, you must find a way to accomplish this task without taking out the aged trees to the greatest extent possible. And where you must remove a tree, you need to establish parameters that replace trees on the basis of the biomass you are removing. By that I mean that you must replace one aged tree with an equivalent amount of trees for that one tree, not just one for one, because it will take decades, perhaps hundreds of years to get to where we are today in terms of the ability to replace the carbon intake of that old tree by a new one. Right now, we are in a very dangerous situation in Arlington: we have lost a great percentage of our tree canopy on which we relied for carbon (smog and other pollutants) removal and storage. You can only degrade this air quality situation further if you remove these old trees or rely on a one to one replacement of them.

Keep in mind that in Arlington County, as with many attractive urban centers, we have seen an increase of new housing and building which have increased the density and population in old neighborhoods by allowing splitting of housing lots to make way for new homes, as well as an increase in density of commercial areas around our metro stops. That comes with the territory of growth, and I'm sure we need that for our tax base and to provide education and other services for the community. But with that growth comes more stress on the environment, all of which have resulted in the removal of trees from existing home lots and commercial areas to accommodate this new construction. If this continues, and the ANC plan as it exists continues forward, we are adding more stress to the ecosystem here in Arlington that will deprive us, and our children and grandchildren, the ability to have the quality of life, degrading as it is, that we have been enjoying until now.

I ask that you take a look at the current urban heat island effect in our region, where on any given summer night, the temperature in Arlington exceeds the temperature in the surrounding suburbs by between 12 and 20 degrees Fahrenheit. Removing these old trees will increase that temperature, causing us to increase our electricity usage for cooling our homes even more than already exists, and creating stronger storm events in the future as a result.

I realize you have pressures and stresses on all sides of this project, but please consider that we all have to live here years after you have removed these trees. All of us would like these years to be healthy ones.

Thank you for your consideration to keep our old trees,

Nancy Dowling
3634 37th Street North
Arlington, VA 22207

From: [Dpascus](#)
To: [Conner, Susan L. NAO](#)
Subject: ANC
Date: Thursday, April 04, 2013 7:55:51 PM

Dear Mrs Conner,

We were just recently informed that it is possible that approximately 900 trees are at stake in Arlington National Cemetery for an expansion plan. As a family with two members laid to rest in ANC, we firmly disagree with this possibility.

Please see to it that the ecosystem and trees are not harmed on any way.

Thank you!

The Pascus family

King George, VA

Sent from my iPhone

From: jasturman@yahoo.com
To: [Conner, Susan L. NAO](#)
Subject: Arl National Cemetery comments
Date: Thursday, April 04, 2013 7:39:11 PM

To whom it may concern:

I am against Arlington National Cemetery's proposal to cut old growth and mature trees from the scenic cemetery to accommodate additional plots. I am in favor of opening a new cemetery elsewhere that would allow internments for the long-term.

One of the best things about ANC are its large trees and the forested viewshed it affords to the region. Cutting trees would certainly impact the cemetery and make it seem more urban and less enjoyable to visit and walk through. The cemetery should be filled to capacity as planned and further burials should be moved elsewhere.

Thank you,
Jeff Sturman
2907B S Woodstock St
Arlington VA 22206

7600 Admiral Drive
Alexandria, VA 22308
April 10, 2013

Mrs. Susan Conner
Chief, Environmental Analysis Section
US Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Mrs. Conner,

I am writing about Arlington Cemetery. My father served as a fighter pilot in World War II, was a prisoner of war in Germany for 15 months, and also flew reconnaissance flights over Korea. He was a career US Air Force officer and is buried in our national cemetery on Long Island. With him are my mother who served with the rank of captain as a social worker at the 232nd General Hospital in France and Belgium during World War II and my infant brother, Francis. I have enormous respect and high regard for our military. I applaud and appreciate our country's commitment to bury our veterans with respect and honor.

Plans to remove all or portions of the old growth forest at Arlington Cemetery alarm me. I am confident that my parents would also be concerned. Cemeteries are places where large trees frequently are found. The trees are critical to creating the peace and serenity earned by the military men and women who lie beneath them. Trees contribute to the health of our air and water. They mitigate noise of traffic and airplanes. In the specific case of Arlington, they help clean the polluted air that makes the Washington DC area an unsafe place to breathe during hot summers.

I understand that the planned expansion at Arlington would allow for burials for seven to 12 years. Surely this relatively short period of time does not warrant the destruction of the last remaining old growth forest in the National Capital region. A stream that runs through the area will be put at risk and water quality will be jeopardized. Instead of destroying these trees, I would hope that the Corps would work with Congressman Jim Cooper of Tennessee who has proposed opening a new cemetery of equal quality and beauty to Arlington.

I look forward to learning more about your thinking on this important matter.

Thank you.

Sincerely,

Eleanor F. Quigley

From: mopalski@aol.com
To: [Conner, Susan L. NAO](#)
Subject: Arlington Cemetery
Date: Tuesday, April 09, 2013 8:22:39 PM

Dear Ms. Conner,

I am writing to support the saving of the old forest at Arlington National Cemetery, as part of the Millennium project. Please consider changing the design to accommodate both the cemetery expansion and saving the old forest.

I am told that if the loop road were re-designed, and the retention wall and one columbaria were removed from the steep ravine above the stream, the 165 year forest could be saved.

The "new" redesigned loop road could connect Humphreys Rd (skirting around the edge of the woodlands and behind the Old Post Chapel) to the planned Millennium Rd which (in the design) already connects to Ord and Weitzel. One Columbaria would be eliminated but the other three could be made larger to make up for the lost capacity in the forest.

This seems like a viable alternative, please tell me if I am missing the mark here. The Army Corps of Engineers can and should change the design.

Trees, especially ones this old, are a community treasure and serve an important place in our local ecosystem. Please help us to preserve them. I live just one mile from the site, off Columbia Pike.

Many thanks,
Mitch Opalski
Douglas Park

7600 Admiral Drive
Alexandria, VA 22308
April 10, 2013

Mrs. Susan Conner
Chief, Environmental Analysis Section
US Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Mrs. Conner,

I am writing about Arlington Cemetery. My father served as a fighter pilot in World War II, was a prisoner of war in Germany for 15 months, and also flew reconnaissance flights over Korea. He was a career US Air Force officer and is buried in our national cemetery on Long Island. With him are my mother who served with the rank of captain as a social worker at the 232nd General Hospital in France and Belgium during World War II and my infant brother, Francis. I have enormous respect and high regard for our military. I applaud and appreciate our country's commitment to bury our veterans with respect and honor.

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I look forward to learning more about your thinking on this important matter.

Thank you.

Sincerely,

Eleanor F. Quigley



OFFICE OF THE COUNTY MANAGER

2100 Clarendon Boulevard, Suite 302, Arlington, VA 22201
TEL 703-228-3120 FAX 703-228-3218 TTY 703-228-4611 www.arlingtonva.us

April 12, 2013

Ms. Susan L. Conner
Acting Chief, Planning and Policy Branch
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Ms. Conner:

Thank you for the opportunity to provide comments to the March 2013 revised draft Environmental Assessment (EA) for the Millennium Project at Arlington National Cemetery. We appreciate the additional information provided in this revised draft and we look forward to continuing to work with you.

The enclosures outline, from the County's perspective, the potential impacts of the proposed project on environmental, historical and cultural resources. We continue to have concerns regarding these impacts and were hopeful that the revised draft EA would more completely address them. There appear to be a number of practical and relatively efficient ways to minimize impacts through further design work, and the County would encourage those efforts to continue.

Given the benefits of Alternative F over the Preferred Alternative, including providing approximately 2,500 additional burial spaces while also being more sensitive to the impacts to the nationally significant environmental and cultural resources of the site; we were hopeful that further refinement of this alternative would have been completed prior to its elimination. We believe that the transportation concerns cited as the reason for eliminating Alternative F are not insurmountable, and that this alternative could produce a project that would meet Congressional direction, the goals for Arlington National Cemetery expansion, and our collective responsibility as stewards of this nationally treasured site.

Thank you again for the opportunity to comment and we look forward to continuing to work with you to achieve the best outcome possible.

Sincerely,

A handwritten signature in blue ink, reading "Barbara M. Donnellan".

Barbara M. Donnellan
County Manager

Enclosure



HISTORIC PRESERVATION SECTION
DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
ARLINGTON COUNTY, VIRGINIA

TO: Susan L. Conner, Acting Chief, Planning and Policy Branch U.S. Army Corps of Engineers, Norfolk District

FROM: Rebecca Ballo, Arlington County CPHD, Historic Preservation

DATE: April 3, 2013

SUBJECT: 2nd Draft Environmental Assessment: Arlington National Cemetery Millennium Project

The Arlington County Historic Preservation Program has received for our review and comment a copy of the 2nd Draft EA for the Millennium Project, dated March 2013. We are appreciative of the opportunity to review this document and provide comments.

Alternatives to the Proposed Action

The range of alternatives considered as part of the undertaking is commendable, as we commented for the first draft. The inclusion of more detailed information on the burial numbers for Alternative F are very helpful in terms of better evaluating the range of alternatives. The additional information on further criteria for screening the alternatives (page 47) adds another dimension for consideration. While the report notes, again, that Alternative F, the more environmentally and cultural resource friendly option, was considered, it still does not meet the project goals. However, the EA does not seem to make a strong case for that supposition given that Alternative F now allows for approximately 2500 more burials than the Preferred Alternative E. The primary reason given for excluding Alternative F seems to be on the basis of parking and transportation management concerns. While these are, of course, viable and real issues given the primary mission of the cemetery, they are also temporary problems. Today's funeral processions will eventually give way in a short span of years to a more passive use by family members and visitors who come individually to see loved ones long since buried, as many family members and tourists do in the rest of the cemetery today. Planning for the maximum parking and transportation demands that an area may have at its peak usage does not do as great a service to the needs of the site in the future, nor does it fully take into account the reality that this temporary, though important use, would have immediate, detrimental, and permanent adverse impacts to the recognized historical and cultural landscape. With some more refined design work, it seems quite possible that Alternative F can be made to meet operational requirements for the cemetery's immediate and future needs.

In summary, given that Alternative F limits most of the development to the west side of the stream, allows for more burials and a longer lifespan for the project, and seems to avoid much of the land and forest disturbance inherent in Alternative E, we would again ask that Alternative F be further considered.

If Alternative F is not considered further, then it would seem that more design work could be done on the Preferred Alternative (see design comments below) in order to further minimize impacts. There have been a number of sensible and simple design solutions presented at Consulting Parties meetings, some of

which have been incorporated in the Preferred Alternative. We would ask that more work be considered to further improve the project and minimize impacts prior to the execution of the FNSI and MOU.

Cultural Resources

The current EA Draft was completed prior to the ongoing 106 consultation work reaching a conclusion on the type and degree of adverse impacts to the National Register listed and National Register eligible sites in the project area. The viewshed studies are ongoing and will require further review. And the information about the portion of Section 29 that is currently listed on the National Register as contributing to Arlington House, but that was transferred to ANC, needs to be clarified, and included in the final EA. As the adverse impacts are still currently unknown, it seems premature to conclude the EA process at this point without further work among the Section 106 Consulting Parties.

Coordination with ANC Master Plan & Design Guidelines

We appreciate the feedback from the first Draft EA on our comments related to compatibility between the design of the Millennium Project and the ANC's *Draft Cemetery Design Guide*. However, we are reiterating the same comments below in order to generate a specific response about how each of the design issues can, or cannot be addressed, per the recommendations of the *Design Guide*.

Arlington County recently had the opportunity to provide comments on the ANC's *Draft Cemetery Design Guide*. A number of stipulations in that Guide would seem to apply to the Millennium Project, and could provide further grounds for work on a redesign of the current proposed Alternative. For example, the *Design Guide* notes that the Millennium Project will be developed under the "Informal Theme". Areas where this thematic approach could be improved as part of a new Alternative Design, or a further refinement of Alternative F, or even as the basis for further design work on Preferred Alternative E, are as follows:

- (p. 41) *Existing trees and vegetation should be preserved and nurtured in order to maintain the mature, protected feel of this part of the cemetery.*
- *Site Planning Standards (p.50) 1. Preserve natural site features such as topography, hydrology, vegetation and tree cover. 3. Preserve the natural site by molding development to fill around existing land forms and features. This development approach minimizes extensive earthwork, preserves existing drainage patterns and preserves existing vegetation. 4. Plan for facilities to be clustered to preserve land, reduce construction cost and maintain as much permeable surface area as possible.*
- *Natural Site Conditions, Topography (p.51) 1. Maintain natural ground slopes and elevations. 5. Avoid development on steep slopes. 6. Avoid development in natural drainage ways and flood plains. Hydrology. B. Limit development in floodplains to open spaces and ceremonial uses. Vegetation (p. 52) The cemetery will be designed to protect and preserve existing native vegetation.*
- *The long perimeter columbarium wall is more suited to the formal theme discussed in the Design Guidelines. The Design Guidelines also note the liabilities of this design, stating that the "columbarium area can feel forbidding to some" and that the "niche walls lack architectural articulation." (pg. 43). The Design Guidelines go further and state that "if new niche walls are built, they should be offset (or court-like) to create a more human scale. One long straight wall is not recommended" (pg. 44).*



HISTORIC PRESERVATION SECTION
DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
ARLINGTON COUNTY, VIRGINIA

In conclusion, we thank you for the opportunity to review the EA and provide comments. We will be available to discuss or provide further clarifications on any of our comments. Please feel free to contact historic preservation staff directly at 703-228-3812.



OFFICE OF SUSTAINABILITY AND ENVIRONMENTAL MANAGEMENT
DEPARTMENT OF ENVIRONMENTAL SERVICES
ARLINGTON COUNTY, VIRGINIA

Comments on March 2013 Environmental Assessment Arlington National Cemetery Millennium Project

April 9, 2013

Thank you for the opportunity to review the final Environmental Assessment for the Arlington National Cemetery Millennium Project. As with our comments on the draft EA, the following comments are made with an understanding of the national importance of Arlington Cemetery and the need to provide burial space to honor America's veterans. At the same time, the comments are made in the context of how proposed impacts to stream valleys from any development activity are evaluated by Arlington County in today's regulatory climate, which includes Virginia's Chesapeake Bay Preservation Act and Regulations and Arlington's local Chesapeake Bay Preservation Ordinance.

While we appreciate the design adjustments made to reduce some of the environmental impacts from the Preferred Alternative, we remain concerned about the significant overall impacts to the wooded stream valley that will still occur.

The following are several key points that we hope can result in a further re-examination of the Preferred Alternative relative to other alternatives with fewer environmental impacts:

- A main justification for the Preferred Alternative and in particular the high-impact loop road appears to be to accommodate vehicular traffic associated with larger ceremonial burials. If the Millennium Project had a much longer lifespan than the 7-12 years projected in the EA, this concern might provide better justification for the stream valley impacts it creates. But, the relatively short timeframe associated with the 'benefits' of the loop road does not appear to justify the environmental and economic costs of the Preferred Alternative.

We suggest consideration of a Transportation Demand Management (TDM) plan to minimize the number of private vehicles that drive to the project area. One option could be a shuttle service to transport funeral participants to and from the ceremony site. An effective TDM strategy could substantially reduce the need to accommodate large numbers of private vehicles with the project design, reducing the amount of pavement created and the overall disturbance in the stream valley.

- We understand that the design team is aware of the erroneous references in Table 1 on pp. 47-48 to all of the other alternatives not meeting Chesapeake Bay Preservation Act standards. Clearly, this is not the case for the alternatives with less impact to the stream valley, and this information should be corrected and clarified to the public as soon as possible.

Finally, we would like to point out that the other environmental benefits associated with the Preferred Alternative are not unique to that design but instead could be incorporated with the

alternatives that have fewer stream valley impacts – and with potentially greater benefit because more stream valley is preserved with these alternatives. These other environmental benefits include the proposed stream restoration, the upland stormwater management efforts, and the invasive plant management program.

We encourage the Cemetery to take a step back before proceeding with the Preferred Alternative, including a longer view of the project costs and benefits, in order to pursue a project re-design that achieves a better balance among burial capacity, stream valley protection, and stream restoration.

Thank you for the opportunity to comment.



DEPARTMENT OF PARKS AND RECREATION

Parks and Natural Resources Division, Caroline Temmermand - Chief

2700 S. Taylor St., Arlington, VA 22206

TEL 703-228-6525 FAX 703-228-6507 www.arlingtonva.us

Comments on March 2013 Environmental Assessment Arlington National Cemetery Millennium Project

April 12, 2013

Thank you for offering an opportunity for Arlington County's Department of Parks and Recreation/ Parks and Natural Resources Division to review and comment on the second Environmental Assessment (EA) for the Arlington National Cemetery Millennium Project, and for considering the comments we provided on the original EA for this project. We understand the importance of honoring our nation's veterans and appreciate your efforts to balance the need for increased burial capacity with environmental concerns. Although some changes and mitigation efforts reflecting our previous comments have been incorporated into the revised EA, we offer the following comments to further reduce impacts to trees and other natural resources:

- We urge you to consider Alternative F as an option to further increase burial space while reducing the environmental impacts of the project. In addition to being less damaging to the environment, it also provides 2,578 more burial spaces than the Preferred Alternative E listed in the revised EA.
- Given the extreme contours of the site, environmental impacts associated with the loop road in Alternative E remains our biggest concern. Although some efforts have been made to mitigate environmental impacts associated with Alternative E, installation of the loop road will still cause substantial damage and not provide for as many burial sites as the design depicted in Alternative F. Alternative E seems to be more focused on short-term transportation issues rather than long-term impacts to our environment and our forest. Alternative plans for parking and transportation for areas served by the loop road should be considered so that inclusion of the road as depicted in Alternative E is not necessary.
- Invasive plant control efforts should be expanded as a mitigation effort for the project. As pointed out in the WSSI report, past disturbance resulted in exotic invasive plants stressing the remaining forest. Disturbance associated with the proposed construction is likely to result in even greater stresses caused by the proliferation of invasive plant species. That will not only allow invasive species to establish new footholds, but may also result in further damage by *Hypoxylon* (now called *Biscogniauxia*) canker as was mentioned in the WSSI report.
- Replacement of 732 native, mature and medium-age trees with less than 400 native trees (and about 200 non-native trees) remains highly insufficient. Consider mitigating the leftover trees at least at a 1-to-1 replacement value, either on site or off-site, or through mitigation in another form.

VLR-7/6/71

NRHP-10/15/66

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM
FOR FEDERAL PROPERTIES

FOR NPS USE ONLY

RECEIVED

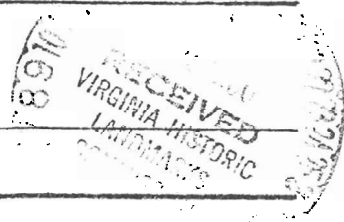
DATE ENTERED

SEE INSTRUCTIONS IN HOW TO COMPLETE NATIONAL REGISTER FORMS
TYPE ALL ENTRIES -- COMPLETE APPLICABLE SECTIONS

1 NAME

HISTORIC
Arlington House

AND/OR COMMON
The Robert E. Lee Memorial



2 LOCATION

STREET & NUMBER
Arlington National Cemetery

CITY, TOWN
Arlington

STATE
Virginia

VICINITY OF
51

CONGRESSIONAL DISTRICT
10th

COUNTY
Arlington

CODE
013

3 CLASSIFICATION

CATEGORY	OWNERSHIP	STATUS	PRESENT USE
<input type="checkbox"/> DISTRICT	<input checked="" type="checkbox"/> PUBLIC	<input type="checkbox"/> OCCUPIED	<input type="checkbox"/> AGRICULTURE <input checked="" type="checkbox"/> MUSEUM
<input checked="" type="checkbox"/> BUILDING(S)	<input type="checkbox"/> PRIVATE	<input checked="" type="checkbox"/> UNOCCUPIED	<input type="checkbox"/> COMMERCIAL <input checked="" type="checkbox"/> PARK
<input type="checkbox"/> STRUCTURE	<input type="checkbox"/> BOTH	<input checked="" type="checkbox"/> WORK IN PROGRESS	<input type="checkbox"/> EDUCATIONAL <input type="checkbox"/> PRIVATE RESIDENCE
<input type="checkbox"/> SITE	<input type="checkbox"/> PUBLIC ACQUISITION	<input type="checkbox"/> ACCESSIBLE	<input type="checkbox"/> ENTERTAINMENT <input type="checkbox"/> RELIGIOUS
<input type="checkbox"/> OBJECT	<input type="checkbox"/> IN PROCESS	<input checked="" type="checkbox"/> YES: RESTRICTED	<input type="checkbox"/> GOVERNMENT <input type="checkbox"/> SCIENTIFIC
	<input type="checkbox"/> BEING CONSIDERED	<input type="checkbox"/> YES: UNRESTRICTED	<input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> TRANSPORTATION
		<input type="checkbox"/> NO	<input type="checkbox"/> MILITARY <input type="checkbox"/> OTHER

4 AGENCY

REGIONAL HEADQUARTERS: (If applicable)
National Capital Region, National Park Service

STREET & NUMBER
1100 Ohio Drive, S.W.

CITY, TOWN
Washington

STATE
D.C.

VICINITY OF
20242

5 LOCATION OF LEGAL DESCRIPTION

COURTHOUSE
REGISTRY OF DEEDS, ETC.
Arlington County Courthouse

STREET & NUMBER

CITY, TOWN
Arlington

STATE
Virginia

6 REPRESENTATION IN EXISTING SURVEYS

TITLE
Historic American Buildings Survey

DATE
1940

☒ FEDERAL ☐ STATE ☐ COUNTY ☐ LOCAL

DEPOSITORY FOR
SURVEY RECORDS
Library of Congress

CITY, TOWN
Washington

STATE
D.C.

DESCRIPTION

CONDITION

☐ EXCELLENT
☒ GOOD
☐ FAIR

☐ DETERIORATED
☐ RUINS
☐ UNEXPOSED

CHECK ONE

☐ UNALTERED
☒ ALTERED

CHECK ONE

☒ ORIGINAL SITE
☐ MOVED DATE _____

DESCRIBE THE PRESENT AND ORIGINAL (IF KNOWN) PHYSICAL APPEARANCE

Arlington House is a Greek revival structure composed of a large two-story central section flanked by two one-story wings. The long axis of the house runs north-south; the front facade faces Washington, D.C., to the east across the Potomac River. The house was built by George Washington Parke Custis, foster son of George Washington, on an 1100-acre tract inherited from his father, John Parke Custis.

Construction began in 1803 on the one-story north wing which, with a matching south wing constructed in 1804, would frame the two-story central section completed about 1817-18. It is believed that George Hadfield, second architect of the Capitol and designer of the Washington City Hall, was architect of Arlington House.

The house is constructed of locally made brick with the exterior stuccoed and scribed to simulate ashlar stonework. Originally the rear (west) facade of the central section was not stuccoed; it was so treated by the Army in the late 19th century. Sometime before the 1860s the stucco was marbelized, as shown in 1864 Civil War photographs. It was again marbelized during the 1967 and 1974 repainting of the house.

The most prominent feature of the house is the large (16' by 52') portico across the central section, formed by eight large stuccoed and marbelized brick Doric columns supporting a massive pediment. Adding to the impression of grandeur are the recessed arched windows on the front and sides of the flanking wings.

Centered under the portico is a large double door opening on a central hall which bisects the house and is terminated at the rear with another pair of large double doors. The central hall is flanked by two large rooms. That on the north is divided by three open arches separating the family parlor in the front from the dining room at the rear. The room on the south, the "White Parlor," was not completed until 1855 under the direction of the Lees. Among its outstanding features are two matching mantelpieces carved with an oak leaf design and purchased for the room by Lee.

The room adjacent to the White Parlor in the south wing was used as a formal dining room and later as a painting studio for George Washington Parke Custis. Following his death it was used as a workroom and painting studio by Mrs. Lee, who called it her morning room. Immediately south of this room at the end of the wing is a smaller room used as an office by G.W.P. Custis and R.E. Lee. The large double connecting doors are surmounted by a fanlight. A door on its west wall gives access to the west-facing conservatory and through it to the grounds. Lacking a fireplace, the office was heated by a stove. The conservatory, located along the west elevation of the south wing at ground level, is about four feet

(continued)

8 SIGNIFICANCE

PERIOD	AREAS OF SIGNIFICANCE -- CHECK AND JUSTIFY BELOW			
<input type="checkbox"/> PREHISTORIC	<input type="checkbox"/> ARCHEOLOGY-PREHISTORIC	<input type="checkbox"/> COMMUNITY PLANNING	<input type="checkbox"/> LANDSCAPE ARCHITECTURE	<input type="checkbox"/> RELIGION
<input type="checkbox"/> 1400-1499	<input type="checkbox"/> ARCHEOLOGY-HISTORIC	<input type="checkbox"/> CONSERVATION	<input type="checkbox"/> LAW	<input type="checkbox"/> SCIENCE
<input type="checkbox"/> 1500-1599	<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> ECONOMICS	<input type="checkbox"/> LITERATURE	<input type="checkbox"/> SCULPTURE
<input type="checkbox"/> 1600-1699	<input checked="" type="checkbox"/> ARCHITECTURE	<input type="checkbox"/> EDUCATION	<input checked="" type="checkbox"/> MILITARY	<input type="checkbox"/> SOCIAL/HUMANITARIAN
<input type="checkbox"/> 1700-1799	<input type="checkbox"/> ART	<input type="checkbox"/> ENGINEERING	<input type="checkbox"/> MUSIC	<input type="checkbox"/> THEATER
<input checked="" type="checkbox"/> 1800-1899	<input type="checkbox"/> COMMERCE	<input type="checkbox"/> EXPLORATION/SETTLEMENT	<input type="checkbox"/> PHILOSOPHY	<input type="checkbox"/> TRANSPORTATION
<input type="checkbox"/> 1900-	<input type="checkbox"/> COMMUNICATIONS	<input type="checkbox"/> INDUSTRY	<input type="checkbox"/> POLITICS/GOVERNMENT	<input type="checkbox"/> OTHER (SPECIFY)
		<input type="checkbox"/> INVENTION		

SPECIFIC DATES 1803-61

BUILDER/ARCHITECT George Hadfield

STATEMENT OF SIGNIFICANCE

The principal significance of Arlington House, as defined by congressional legislation, lies in its association with Robert E. Lee--hence its legislated designation "Arlington House, The Robert E. Lee Memorial." It is also significant for its prior association with George Washington Parke Custis, step-grandson and adopted son of George Washington, and as an outstanding example of early Greek revival architecture.

G.W.P. Custis inherited the 1100-acre estate from his father, the only surviving son of Martha Washington. Like John Parke Custis, G.W.P. Custis was raised at Mount Vernon, and he dedicated much of his life to perpetuating the memory of George Washington. From circumstantial evidence, it appears that he commissioned George Hadfield, second architect of the U.S. Capitol, to design Arlington House. According to architectural historian Ralph Hammett, this was only the third representation of the Greek revival style in the United States.

Robert E. Lee, who was related to Custis's wife, was a frequent visitor to Arlington from childhood until his marriage to Custis's only daughter, Mary, when he was 25 years old. For the next 30 years the Lees considered Arlington their home. His U.S. Army career would take him and his family to all parts of the country, but they returned to Arlington whenever his Corps of Engineers duties permitted. Lee was usually able to spend at least some of the winter months at Arlington and passed 25 Christmas holidays there. Mary Lee frequently remained home with her parents in his absences, and six of the seven Lee children were born at Arlington.

In the Lee bedroom on April 19, 1861, Lee made his fateful decision to resign his U.S. Army commission rather than take up arms against his native state following Virginia's secession from the Union. On April 22 he left Arlington forever. His wife and children also departed in early May upon learning that Federal troops were about to occupy the area.

During the war years many of the family possessions left behind were lost or stolen while the military occupation of Arlington resulted in considerable damage to its woodland, described by a prewar English visitor as "some of the finest woods I have yet seen in America." Roads were cut to accommodate the flow of supplies and soldiers and several military works were constructed on the estate to help protect Arlington Heights.

(continued)

9 MAJOR BIBLIOGRAPHICAL REFERENCES

Ralph Hammett. Architecture in the United States: A Survey of American Styles Since 1776. New York: Wiley, 1976.

Murray H. Nelligan. Custis-Lee Mansion, The Robert E. Lee Memorial. National Park Service Historical Handbook No. 6. Washington: National Park Service, 1962.

10 GEOGRAPHICAL DATA

ACREAGE OF NOMINATED PROPERTY 27.91

UTM REFERENCES

A 1,8 3,2,0,3,0,0 4,3,0,5,7,1,0
ZONE EASTING NORTHING
C 1,8 3,1,9,7,0,0 4,3,0,5,4,7,0

B 1,8 3,2,0,1,9,0 4,3,0,5,1,9,0
ZONE EASTING NORTHING
D 1,8 3,1,9,8,4,0 4,3,0,5,6,7,0

VERBAL BOUNDARY DESCRIPTION

The National Register boundary encompasses all land adjacent to Arlington House under National Park Service jurisdiction. This land borders the Fort Myer Military Reservation on the west and is elsewhere surrounded by Arlington National Cemetery. See accompanying maps.

LIST ALL STATES AND COUNTIES FOR PROPERTIES OVERLAPPING STATE OR COUNTY BOUNDARIES

STATE	CODE	COUNTY	CODE
STATE	CODE	COUNTY	CODE

11 FORM PREPARED BY

NAME / TITLE

Anna Seagraves, Ann Fuqua, Nicholas Veloz

ORGANIZATION George Washington Memorial Parkway

DATE

National Capital Region, National Park Service

1/15/80

STREET & NUMBER

TELEPHONE

Turkey Run Park

(703)557-3635

CITY OR TOWN

STATE

McLean,

Virginia 22101

12 CERTIFICATION OF NOMINATION

Not Applicable--Documentation of existing
STATE HISTORIC PRESERVATION OFFICER RECOMMENDATION National Register
property.
YES _____ NO _____ NONE _____

STATE HISTORIC PRESERVATION OFFICER SIGNATURE

In compliance with Executive Order 11593, I hereby nominate this property to the National Register, certifying that the State Historic Preservation Officer has been allowed 90 days in which to present the nomination to the State Review Board and to evaluate its significance. The evaluated level of significance is _____ National _____ State _____ Local.

FEDERAL REPRESENTATIVE SIGNATURE

TITLE

DATE

FOR NPS USE ONLY

I HEREBY CERTIFY THAT THIS PROPERTY IS INCLUDED IN THE NATIONAL REGISTER

DATE

DIRECTOR, OFFICE OF ARCHEOLOGY AND HISTORIC PRESERVATION

ATTEST:

DATE

KEEPER OF THE NATIONAL REGISTER

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

FOR NPS USE ONLY

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DATE ENTERED

CONTINUATION SHEET 1

ITEM NUMBER 7

PAGE 2

lower than the level of the adjacent rooms. It has "glazed walls" consisting of four large arched windows on the west facade and windows and a glazed door on the south.

Along the west side of the central portion and the north wing is a series of halls, service areas, and a pantry. From this area the main stairs and a rear stair ascend to the second floor. At the juncture of these halls and the main central hall, adjacent to the foot of the main stairs, are three frescoes in the area above the arches around the intersecting walls. These hunting and other animal scenes are attributed to G.W.P. Custis.

In the north wing along the west side is the pantry and a stairway to the basement. In the northeast corner of the wing is a schoolroom, which may have been Mrs. Lee's room as a child. Next to it on the east facade is the bedroom of her parents. Between this bedroom and the family parlor is a guest room. The Custis bedroom and the guest room are accessible by an inner hall running from the schoolroom to the family parlor.

Directly below the Custis bedroom and accessible by the pantry stairs is a large winter kitchen with a large central fireplace. The fireplace divides the kitchen into two areas, with the rear portion being used as a laundry. Adjacent to the kitchen and directly under the pantry is a large open corridor providing access to the outside through two doors and to a wine cellar adjacent to the kitchen.

The main staircase is typical of those of classic revival houses in that its location was de-emphasized by placing it slightly off the central hall. The second floor to which it ascends also has a central hall opening to rooms on either side. The Lee bedroom is immediately adjacent to the stairs on the south side; a small dressing room adjoins it over the stairs in the southwest corner. The southeastern room on the floor is a bedroom used by the Lee boys. The Lee daughters occupied the two bedrooms on the north side of the hall, containing marble mantelpieces of a plain design. The younger girls used a small connecting room at the rear for dressing and play.

Many of the present Arlington House furnishings are original to or historically associated with the property during its occupancy by the Custis and Lee families. Significant items include furniture, paintings, ceramics, glassware, silver, books, and textiles in use in the house prior to 1861. Such objects, individually identified in the Arlington House museum catalog, are considered integral to the property for purposes of the National Register. The acquisition of original furnishings is an ongoing project and will continue as pieces become available.

(continued)

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

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DATE ENTERED

CONTINUATION SHEET 2

ITEM NUMBER 7

PAGE 3

Two outbuildings contemporary with the construction of the main house lie perpendicular to the long axis of the house on the west near the ends of the wings. The north building housed the summer kitchen and contained slave quarters; it is now adapted as a sales facility. The south building, a storeroom, smoke room, and slave quarters, has been historically refurnished. Both buildings are brick on 40' by 20' stone foundations and are stuccoed in rough texture. The nonconnecting rooms in each structure are reached by three evenly spaced doors facing a central court or drive. Windows at the rear of each room except the smoke room provide natural light. Pilasters and arches decorate the gable ends of the two buildings.

Two other structures on the property postdate 1861 and thus do not contribute to its legislatively defined significance as a memorial to Robert E. Lee. Some 200 feet from the north end of the mansion is a two-story brick building built by the Army in the 1880s as a potting house for Arlington National Cemetery. It measures 22' by 32' and is topped by a hipped roof with ornamented ridge line and small gabled vents on each side. Brick pilasters are at the corners and divide the two bays on the short sides and the three bays on the long sides; they support a brick modillion cornice. Segmental arches cap the windows and doors. The building currently serves as a small park museum. Just north of the north outbuilding described above is a 19' by 21' rest room building constructed by the Army in 1925. Its stuccoed brick exterior and gabled roof with white trim articulating the pediment mimic the historic outbuildings.

During the lifetime of G.W.P. Custis, a large portion of Arlington was maintained as a gentleman's country estate. Most of its acreage comprised "The Park," a virgin woodland of ancient oaks and groves of walnut, chestnut, and elm trees extending from the Georgetown and Alexandria Road along the river to the western edge of the estate. Most of this land is now within Arlington National Cemetery and the George Washington Memorial Parkway. During the Lees' residency, the carriage drive to the mansion came up along the south and eastern edge of the flower garden south of the house and across the front of the house. This approach from behind and beside the garden is now maintained by Arlington National Cemetery and used as a footpath.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

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**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET 3

ITEM NUMBER 8

PAGE 2

In 1863 Congress levied a tax on all confiscated properties, including Arlington, requiring that owners personally appear to make payment. A relative attempted to pay the Arlington taxes for Mrs. Lee, who was ill and behind Confederate lines, but payment was rejected. Arlington was put up for sale for non-payment of taxes in January 1864 and was purchased by the U.S. Government. In May 1864 Secretary of War Edwin Stanton ordered that a national cemetery be established at Arlington, and the first burials took place that month. The house became headquarters for Arlington National Cemetery, continuing in that use until the late 1920s.

Until 1924 no official action had been taken to restore the house as a memorial to Robert E. Lee. Steps had been taken previously, however, to protect the integrity of the grounds immediately surrounding the house. The burial of distinguished generals on the front lawn had been halted and burials around Mrs. Lee's flower garden had long since ceased. In 1928, following its authorization by Congress as a memorial to Lee, the house began to be restored by the War Department. In 1933 the house and immediate grounds were transferred to the National Park Service. By that time some structural changes made since 1861 had been reversed and many rooms had been partially furnished. Since then, further structural changes based on historical research have been made, and many of the original furnishings have been identified and acquired.



Georgetown

THEODORE Roosevelt Memorial
Little Roosevelt Island

Channel

WEST

POTOMAC

RIVER

ROSSLYN

FORT MYER

North Post

ARLINGTON NATIONAL

Boundary of Register property

CEMETERY

JOHNSON PARK

Lagoon

South

NAVY

THE MONTAGU

DANVILLE ST

WASHINGTON ST

PILLMORE ST

IRVING

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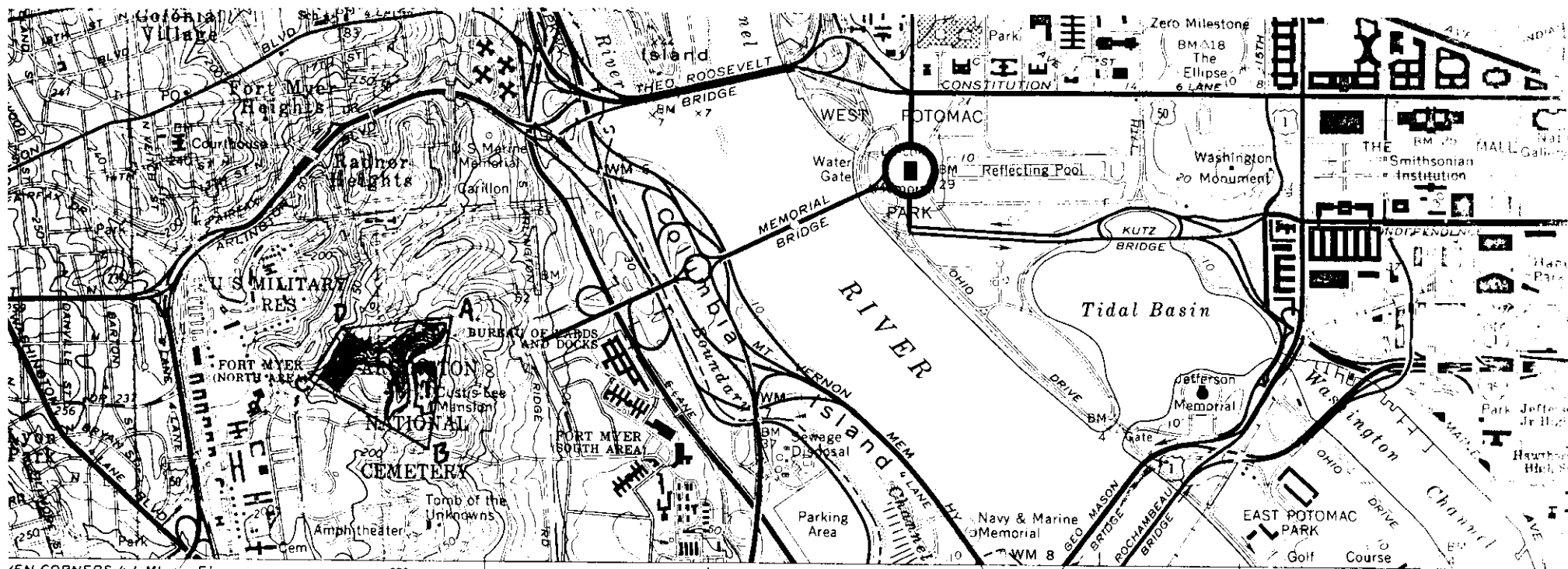
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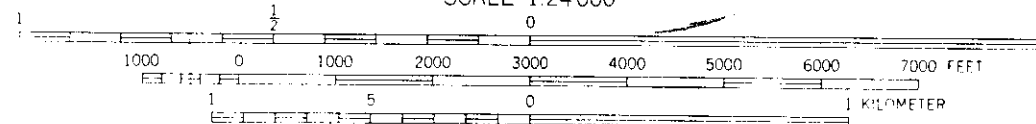
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(ALEXANDRIA)
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MOUNT VERNON 14 MI.

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ALEXANDRIA, VA. 5 MI.
FREDERICKSBURG, VA. 53 MI.

SCALE 1:24 000



CONTOUR INTERVAL 10 FEET

DATUM IS MEAN SEA LEVEL

DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS MEAN LOW WATER

SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER

THE MEAN RANGE OF TIDE IS APPROXIMATELY 2.8 FEET

UTM REFERENCES:

- A: 18/320300/4305710
- B: 18/320190/4305190
- C: 18/319700/4305470
- D: 18/319840/4305670

MARYLAND

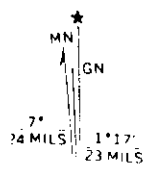
QUADRANGLE LOCATION

WAS

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
AND VIRGINIA DIVISION OF MINERAL RESOURCES, CHARLOTTESVILLE, VIRGINIA 22903
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

ARLINGTON HOUSE, THE ROBERT E. LEE
MEMORIAL

0-01



AND 1971 MAGNETIC NORTH
ON AT CENTER OF SHEET

April 12, 2013

Ms. Susan L. Connor
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers
803 Front St.
Norfolk, VA 23510

Dear Ms. Connor,

Thank you for providing the opportunity to comment on the revised Environmental Assessment for the proposed Millennium expansion project at Arlington National Cemetery. The revised plan is unnecessarily destructive to historic and natural resources and the revised EA does not substantively address major concerns that have been raised about this project.

Specifically, the construction of the loop road into the steep ravine and across a streambed will require a high degree of land disturbance and infilling, which will significantly change the existing topography. Given this land disturbance, a full Environmental Impact Statement needs to be conducted.

Furthermore, the Corps did not adequately consider other alternatives that would be less damaging to the topography and existing old-age trees. For example, why isn't the proposed road designed so that it doesn't cross the stream but instead loops around through the section closest to Ft. Meyer and parallel to McNair Road. My understanding is that this design option was not even considered.

The project can and should be redesigned to minimize the destruction of Arlington House Woods. Doing so would provide a buffer to the adjacent old-growth forest and an aesthetic backdrop to the expansion project.

Thank you for considering this letter.

Sincerely,

Christine M. Freidel
3710 N. 30th St.
Arlington, VA 22207

Cc: Arlington County Board
Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran

From: [Mom Franke](#)
To: [Conner, Susan L. NAO](#)
Subject: Arlington National Cememtery
Date: Thursday, April 11, 2013 9:51:56 PM

We visited the Cemetery today. We were told that 28 people are buried there 6 days a week. We can understand that the cemetery will run out of space. Rather than cut the old trees for space, there is a better solution. Trees add beauty to the area and life to the air and water and ecosystem of the area. Work associated with cutting down the trees would reshape the erodible topography around a narrow stream that runs through the woods, putting the area at risk for water pollution. a better solution would be to leave the trees standing and find new land space for a cemetery.
Mr. Mrs. John Franke

From: [Nancy Vehrs](#)
To: [Conner, Susan L. NAO](#)
Cc: countyboard@arlingtonva.us
Subject: Arlington National Cemetery Millennium Project Environmental Assessment
Date: Wednesday, April 10, 2013 10:33:12 PM

April 11, 2013

Ms. Susan L. Connor

Chief, Environmental Analysis Section

U.S. Army Corps of Engineers, Norfolk District

803 Front ST

Norfolk, VA 23510

Re: Arlington National Cemetery Millennium Project, draft revised Environmental Assessment

Dear Ms. Connor:

The Virginia Native Plant Society appreciates this opportunity to comment on the revised Environmental Assessment (EA) on the proposed Millennium expansion project at Arlington National Cemetery (ANC). We are very disappointed that the design of the current project and the revised EA do little more than compile studies that were missing from the original EA without addressing substantive comments raised about the project.

We believe that both the process and the product for this proposal are seriously flawed. As currently designed, the project unnecessarily puts into conflict the shared and deeply held values of properly recognizing our veterans; protecting unique historical and ecological resources, and; abiding by the law. Because the process was rushed and did not adequately consider alternate views, the resulting product violates the public trust and threatens irreplaceable resources. The Millennium expansion project does not need to be either an expansion of the Cemetery or preservation of old age forest with high historical and ecological value – with a better design and a better process it can be both.

Public Law 107-107, Section 2863 (h) (2), which transferred 12 acres of Section 29, from the Department of Interior to the Department of Defense for purposes of expanding the operations of the Cemetery specifically states: “The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29” (*italics added*).

In adopting the legislation for the transfer of the section of Arlington House Woods from the National Park Service to the Department of Defense, Congress recognized the importance of designing a project that preserves the contours of this natural woodland as a backdrop both to the Arlington House – Lee Mansion and to Arlington National Cemetery. The Millennium project as it is currently proposed does not meet this requirement.

Specifically, the construction of the loop road into the steep ravine and across a streambed will require a high degree of land disturbance and infilling which will significantly change the existing topography. According to the EA, “(t)he Millennium project will require significant earthwork” (p. 95). As currently designed, the project will require over two-thirds of a mile of retaining walls of up to three-stories high and cutting and filling over 100,000 cubic yards of soil (EA p. 95). Given this “high degree of land disturbance”, a full Environmental Impact Statement needs to be conducted.

Likewise, the EA notes that “NEPA requires considerations of both context and intensity.” “Significance of impacts is determined by examining both the context and intensity of the proposed action (40 CFR 1508.27).” (EA. P. 94) Historically, the 12 acres transferred to DOD was considered to be a part of Arlington House Woods and is listed on the National Register for Historic Places and the remaining section is listed as a Virginia Native Plant Society Registry Site. In this project, both context and intensity are significant, and yet the EA fails to follow the NEPA regulations and purports to make a “finding of no significant impact” (FONSI).

We believe that other alternatives that would be less damaging to the topography and existing old-age trees were not adequately considered. Specifically, the analysis of alternative “F” in the EA is misleading and inaccurate, both in the projected loss of trees and in the analysis of the impact on the Chesapeake Bay Protection Act. The repeated question (both at the ANC site visit on March 16, 2013 and at the National Capital Planning Commission on April 4, 2013) of why the road isn’t redesigned so that it does not cross the stream but instead loops around through the section closest to Ft. Myer and parallel to McNair Road was not even considered and no explanation has been given for why that design option was not considered. The project should be redesigned to minimize the destruction of Arlington House

Woods, both to provide a buffer to the adjacent old-growth forest and to provide an aesthetic backdrop to the expansion project.

Varying estimates have been provided as to the annual average number of burials at Arlington National Cemetery of between 5,000 (statement by Colonel Bruzese on March 16 site visit) to 7,000 (EA, p. 18). Based on these estimates and given that the current design would create an additional 30,000 initial burial sites, as proposed, this project would extend the operations of the cemetery of between 4.2 and 6 years. Redesigning the project to meet the requirements of the law would have a relatively small impact on the longevity of the operations of the cemetery but would have a tremendous impact on saving irreplaceable historical, ecological, and cultural resources

Rushing this project through has also resulted in a failed NEPA process. The consulting agencies were told that the project will be at the 95% design stage within days of the April 12, 2013, deadline for public comments on the revised Environmental Assessment and ANC representatives at the National Capital Planning Commission on April 4, 2013 publicly stated that the design was "essentially 100% complete". This reveals a blatant disregard for the NEPA process in soliciting and responding to issues raised by the public.

For all of the above-mentioned reasons, we ask that the project be redesigned and that the process follow the law.

Sincerely,

//ss//

Nancy Vehrs, President

Virginia Native Plant Society

cc: Arlington County Board
Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran

From: [Claire O'Dea](#)
To: [Conner, Susan L. NAO](#)
Subject: Arlington National Cemetery Millennium Project
Date: Thursday, April 11, 2013 4:10:40 PM

Dear Ms. Conner,

I am writing to register my comments on the revised EA for the Arlington National Cemetery Millennium Project. I believe that the revised EA fails to address substantive comments raised about the project during the previous EA review. I am especially disappointed that a full EIS was not completed. The construction of the loop road requires "significant earthwork" and a "high degree of land disturbance." A full EIS should be conducted for a project of this size and with this amount of destruction. Consideration should be given to redesigning the loop road to not cross the stream but instead loop around through the section closest to Ft. Myer and parallel to McNair Road should be considered; this redesign would minimize the amount of destruction caused by this project.

This project should be redesigned, and the law should be followed during this redesign.

Sincerely,
Claire O'Dea

From: [Lori Bowes](#)
To: [Conner, Susan L. NAO](#)
Subject: Arlington National Cemetery Millennium Project
Date: Friday, April 12, 2013 9:42:26 PM

Ms. Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front ST
Norfolk, VA 23510

Re: Arlington National Cemetery Millennium Project, draft revised Environmental Assessment

Dear Ms. Conner:

I appreciate having this opportunity to comment on the revised Environmental Assessment (EA) on the proposed Millennium expansion project at Arlington National Cemetery (ANC).

As currently designed, the project unnecessarily puts into conflict the shared and deeply held values of properly recognizing our veterans; protecting unique historical and ecological resources; and abiding by the law. The Millennium expansion project does not need to be either an expansion of the Cemetery or preservation of old age forest with high historical and ecological value – with a better design and a better process it can be both.

I live near Arlington Cemetery and ride my bicycle beside the crumbling Navy Annex daily. I also spend a great deal of my life caring for someone with injuries he sustained in the Army, so I am not unconcerned about respecting Veterans, but I can't believe that jeopardizing an old growth forest in the sacred ground of ANC is the best way to honor our Veterans' sacrifice.

Sincerely,

Lori Bowes
Arlington, VA

From: [Margaret Chatham](#)
To: [Conner, Susan L. NAO](#)
Subject: Arlington National Cemetery Millennium Project
Date: Thursday, April 11, 2013 1:04:13 PM

Dear Ms. Conner,

I am writing to support anything that can be done to reduce the extent of destruction to the old growth forest at Arlington Woods. Old Growth is not just trees, but all the other organisms around, on & under them that make up an ecosystem. We have too little of it left in the east to squander any at all. Replacing the trees cut, even with the same species, means starting over, looking at hundreds of years' wait (another millennium?) for something approximating the current ecosystem to redevelop.

Sincerely,

Margaret Chatham
2631 Kirklyn St
Falls Church, VA 22043

From: [Quigley](#)
To: [Conner, Susan L. NAO](#)
Subject: Arlington National Cemetery
Date: Wednesday, April 10, 2013 1:14:06 PM
Attachments: [Arlington Cemetery.conner.apr2013..docx](#)

7600 Admiral Drive
Alexandria, VA 22308

Mrs. Susan Conner
Chief, Environmental Analysis Section
US Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Mrs. Conner,

I am writing about Arlington Cemetery. My father served as a fighter pilot in World War II, was a prisoner of war in Germany for 15 months, and also flew reconnaissance flights over Korea. He was a career US Air Force officer and is buried in our national cemetery on Long Island. With him are my mother who served with the rank of captain as a social worker at the 232nd General Hospital in France and Belgium during World War II and my infant brother, Francis. I have enormous respect and high regard for our military. I applaud and appreciate our country's commitment to bury our veterans with respect and honor.

Plans to remove all or portions of the old growth forest at Arlington Cemetery alarm me. I am confident that my parents would also be concerned. Cemeteries are places where large trees frequently are found. The trees are critical to creating the peace and serenity earned by the military men and women who lie beneath them. Trees contribute to the health of our air and water. They mitigate noise of traffic and airplanes. In the specific case of Arlington, they help clean the polluted air that makes the Washington DC area an unsafe place to breathe during hot summers.

I understand that the planned expansion at Arlington would allow for burials for seven to 12 years. Surely this relatively short period of time does not warrant the destruction of the last remaining old growth forest in the National Capital region. A stream that runs through the area will be put at risk and water quality will be jeopardized. Instead of destroying these trees, I would hope that the Corps would work with Congressman Jim Cooper of Tennessee who has proposed opening a new cemetery of equal quality and beauty to Arlington.

I look forward to learning more about your thinking on this important matter.

Thank you.

Sincerely,
Eleanor F. Quigley

From: [Leigh Pickering](#)
To: [Conner, Susan L. NAO](#)
Cc: Manica_Noziglia@warner.senate.gov; Amanda_Chuzi@kaine.senate.gov; [Tim Aiken](#)
Subject: Arlington National Cemetery's Millennium Project
Date: Thursday, April 11, 2013 2:48:49 PM

April 11, 2013

Ms. Susan L. Connor

Chief, Environmental Analysis Section

U.S. Army Corps of Engineers, Norfolk District

803 Front Street

Norfolk, VA 23510

By e-mail: <Susan.L.Conner@usace.army.mil>

Re: Arlington National Cemetery Millennium Project, draft revised Environmental Assessment

Dear Ms. Connor:

I appreciate having this opportunity to comment on the revised Environmental Assessment (EA) on the proposed Millennium expansion project at Arlington National Cemetery (ANC). It is distressing that the design of the current project and the revised EA do little more than compile studies that were missing from the original EA without addressing substantive comments raised about the project.

Both the process and the product for this proposal are seriously flawed. As currently designed, the project unnecessarily puts into conflict the shared and deeply held values of properly recognizing our veterans; protecting unique historical and ecological resources, and; abiding by the law. Because the process was rushed and did not adequately consider alternate views, the resulting product violates the public trust and threatens irreplaceable resources.

Our veterans fought and died for the right to due process of law that our Constitution guarantees its citizens. Does it seem somehow ironic that an entity that purports to represent those veterans would completely bypass that due process to achieve its own poorly conceived ends? The property build-out that is being discussed is not an either/or proposition. Why the designers choose to draw such a line in the sand demonstrates a lack of planning, architectural skill and an intense disrespect towards both due process and the remains of our imperiled American landscape, at a National Historic Site no less.

Consider walking along a three story retaining wall for most of a mile; would the land seem minimally disturbed or would it feel like a bridge abutment, a highway overpass. Why destroy the land, ancient trees and a Virginia Native Plant Registry site when that can be avoided? Why can't or won't the designers comply with the historic, environmental and landscape intent that Congress specified in the land transfer? There are many competent and skilled sustainable landscape designers seeking employment with this type of project and challenge. Sustainable designers would have no problem with a re-design of the facility to satisfy virtually all parties. Perhaps the existing designers are due for a skills update. Whatever the cause, there is no reason for non-compliance in this issue; the law and process is clear and we have the technology. Please don't settle for less than the best when it comes to our nation's historic and environmental legacy. Both are valuable; but one will be gone without people of vision and common sense to preserve it.

For all of the above-mentioned reasons, the project needs to be redesigned and the process needs to follow the law.

Sincerely:

Leigh M. Pickering

cc

Senator Mark Warner

Manica_Noziglia@warner.senate.gov <mailto:Manica_Noziglia@warner.senate.gov>

Seantor Tim Kaine

Amanda_Chuzi@kaine.senate.gov

Congressman Jim Moran

Tim.Aiken@mail.house.gov> <<mailto:Tim.Aiken@mail.house.gov%3e>>

From: [Heather Selig](#)
To: [Conner, Susan L. NAO](#)
Cc: taarmao@aol.com
Subject: Arlington Woodlands at Arlington National Cemetery.
Date: Friday, March 15, 2013 2:35:02 PM

Ms. Conner,

I live in the Penrose neighborhood, adjacent to the Navy Annex and the Arlington Woodlands. Arlington Woodlands (28 acres) is the only remaining remnant of a 600 acre old-growth forest on the original 1,100 acre plantation established in 1800 by George Washington Custis. ANC is proposing cemetery expansion into the woodlands despite the fact that they have acquired 37 acres from the Navy Annex Site adjacent to the cemetery. Arlington National Cemetery (ANC) is a national treasure and shrine. Arlington National Cemetery's Vision statement reads "America's premier military cemetery - A national shrine - A living history of freedom - Where dignity and honor rest in solemn repose." The current cemetery expansion proposal -- The Millennium Project-- seems to be a blueprint of contradiction to their stated vision. The revised EA for The Millennium Project states "that the project will remove from a woodland 732 healthy native trees with a maximum age of 145 years. The majority of the trees are less than 105 years. However, some trees may actually be much older, as they have regrown from the stumps of older trees."

While most of the land within the boundaries of ANC embraces our war heroes, a small fraction of that land supports an incredible variety of living giants and they in turn support many animals. Migrating and resident birds find refuge, food and water here. Eagles soar overhead, owls, hawks, woodpeckers, foxes, and countless other species raise their young here. The Millennium Project would kick start the systematic destruction of the last old growth forest in Northern Virginia. These trees are the remains of an old-growth forest ecosystem which provide significant environmental benefits to the surrounding communities and the cemetery itself. There is nothing on earth better than old growth forests to produce oxygen, clean water, sequester CO2, prevent erosion and influence climate. Intact old growth forest in the eastern United States is currently at .06 percent.

If this project goes forward the entire forest is at risk and becomes vulnerable to storm damage and pollution and further incursion for more and more burial plots. Removing the forest piece by piece will destroy the habitat essential to life and will forever destroy the living history of Arlington Cemetery. Congressman Jim Cooper, in a commentary to the Washington Post dated Aug 13, 2011, stated the "Millennium Project, (is) a pompous name for a small sloping field and large wooded ravine at the western edge of the cemetery.... Another concern is the old-growth forest in the steep ravine that borders the cemetery. The Millennium ravine was deemed unfit for burials for 150 years; no amount of engineering will change that." Congressman Cooper continues "Arlington Cemetery cannot keep growing forever." He correctly advises that the solution instead is to build a new national cemetery. So the question is, does it close before you destroy this ecological treasure in Arlington, VA or after?

While ANC feels the pressure to expand into the forest, there is a limitation on expansion despite the never ending need for burial and columbarium space. The cemetery is graced with beauty and peacefulness that is enhanced by the majestic old trees and will be diminished without them. Removing the forest to expand Arlington National Cemetery is an unacceptable solution to a solvable problem. The ANC administration, the U.S. Army and the U.S. Army Corp of Engineers must cancel their plan to remove any of these trees and instead take immediate steps to permanently protect the old-growth forest from any and all threats natural and man-made. The federal government and the military need to find an appropriate place to build a new cemetery for our current, and future, heroes and dignitaries. There are countless other admirable ways to honor departed souls. It is unconscionable to kill the living ancients to create space to bury the dead when another national cemetery can, and should be, created elsewhere. I am a Naval Officer, graduated from the US Naval Academy and I don't care if there is room for me to be buried in ANC. None of my relatives who served in WWII or Korea or Vietnam are buried there. I have a few classmates that are buried there but it is not something any of us ever aspired to. There are plenty of other national, regional and local cemeteries in the United States. For instance, my grandfather is buried at MCB Quantico. He is a Purple Heart Awardee. I think that the US Army can come up with a better idea than to cut down old growth forests. I'm sorry if the Corps of Engineers believes this to be the cheapest and easiest solution. But it is not the best solution.

R/

Heather Selig,
LT, USNR

EIT, M.S.



OLD-GROWTH FOREST NETWORK

"Connecting people with nature by creating a national network of protected, mature, native forests"

March 28, 2013

Dear Ms. Connor,

I am writing to comment on the expansion of the Arlington National Cemetery. I have a Ph.D. in Ecology and I have written two books on the subject of eastern U.S. Forests. In addition I was on the official tour of the project area. Although the forest that will be cut into for the expansion is not true primary old-growth it does create an important buffer for one of the last remaining old-growth forests in Northern Virginia – probably THE last remaining publically accessible old-growth forest in the region: Arlington Woods. The forest in the planned construction area is important as more than just a buffer, however, since it is recovering and in just a generation or two it will be considered old-growth also. This is significant because we keep losing these old forests, but rarely are we allowing them to recover.

The ecological benefits of old-growth forests include purifying the water, and the air; and providing habitat for other plants and animals. But the human benefits of forests are just as important. This particular forest creates a quiet and serene atmosphere in a sacred space. The last thing needed here is more paving – which is what the proposed project will create.

The expansion should be planned for elsewhere, or if the loop road was re-designed, and the retention wall and one columbaria were removed from the steep ravine above the stream, the 145 year forest could be saved.

The "new" redesigned loop road could connect Humphreys Rd (skirting around the edge of the woodlands and behind the Old Post Chapel) to the planned Millennium Rd which (in the design) already connects to Ord and Weitzel. One Columbaria would be eliminated but the other three could be made larger to make up for the lost capacity in the forest.

My husband was a Vietnam Veteran who died of (suspected) Agent Orange related exposure. He was retired Army Special Forces. His ashes were buried among tree roots because he loved them so and wanted his remains to become part of the living world. He would never have wanted his death to cause the destruction of a forest. I suspect there are many others who feel the same.

Sincerely,

Joan Maloof, Ph.D.

Founder and Executive Director of the Old-Growth Forest Network

Mr. Patrick K. Hallinan
Superintendent, Arlington National Cemetery
Arlington, VA 22211-5003

March 8, 2013

Dear Mr. Hallinan:

I am writing on behalf of the Arlington Historical Society (AHS) to say that the Army Corps of Engineers' December 2012 proposal to destroy much of Arlington House Woods and permanently alter the adjacent streambed would do a great disservice to a national cultural heritage. Arlington House Woods comprises one of the few remaining old-growth forests in the national capital area, whose presence was considered integral to the original concept for Arlington House.

The Society appreciates the need for Arlington National Cemetery (ANC) to increase its ability to provide burials for our nation's heroes, but destruction of Arlington House Woods would exact too high a price for the benefit of the extra space. We would be happy to participate in discussions exploring alternative ways to meet ANC's needs in a manner that preserves Arlington's, and the nation's, cultural heritage.

Thank you for considering the views of the Arlington Historical Society.

cc: U.S. Senator Mark Warner
U.S Senator Timothy Kaine
Rep. James Moran
Kathryn A. Condon, Arlington National Cemetery
Susan A. Conner, U.S. Army Corps of Engineers
Barbara Donnellan, Arlington County Manager

Sincerely Yours,

Ali Ganjian,
President

From: [nickgin](#)
To: [Conner, Susan L. NAO](#); Manica_Noziglia@warner.senate.gov; Amanda_Chuzi@kaine.senate.gov; Tim.Aiken@mail.house.gov
Subject: Comment letter of the revised EA for Arlington National Cemetery Millennium Project
Date: Friday, April 12, 2013 4:24:21 PM

Hello,

My name is Virginia McNair and I am writing regarding the proposed Millennium expansion of Arlington National Cemetery. I am a registered voter in Virginia and my husband is retired US Army.

As currently proposed, the project does not meet the guidelines established by Public Law 107-107, that the cemetery expansion be designed within the contours of the land. The current proposal calls for over two-thirds of a mile of retaining walls up to three-stories high.

I am strongly opposed to the project as currently proposed. The project needs to be and can be redesigned. The extremely high environmental, historical and economic cost of destroying irreplaceable resources for a mere 4-6 years of additional operations is not justified and a long term solution must be found.

Thank you for your work, and I hope you will consider my position.

Virginia McNair

From: [dnick](#)
To: [Conner, Susan L. NAO](#); Manica_Noziglia@warner.senate.gov; Amanda_Chuzi@kaine.senate.gov; Tim.Aiken@mail.house.gov
Subject: Comment letter of the revised EA for Arlington National Cemetery Millennium Project
Date: Friday, April 12, 2013 4:27:37 PM

Hello,

My name is David Nichols and I am writing regarding the proposed Millennium expansion of Arlington National Cemetery. I am a registered voter in Virginia and I am a US Army First Sergeant (Retired).

As currently proposed, the project does not meet the guidelines established by Public Law 107-107, that the cemetery expansion be designed within the contours of the land. The current proposal calls for over two-thirds of a mile of retaining walls up to three-stories high.

I am strongly opposed to the project as currently proposed. The project needs to be and can be redesigned. The extremely high environmental, historical and economic cost of destroying irreplaceable resources for a mere 4-6 years of additional operations is not justified and a long term solution must be found.

Thank you for your work, and I hope you will consider my position.

David Nichols

From: [Hadley, Nancy](#)
To: [Conner, Susan L. NAO](#)
Cc: [Manica, Noziglia@warner.senate.gov](#); [Amanda, Chuzy@kaine.senate.gov](#); [Tim.Aiken@mail.house.gov](#)
Subject: Comment letter on revised EA for Arlington National Cemetery Millennium Project
Date: Friday, April 12, 2013 8:33:18 AM

Nancy Hadley

5300 Columbia Pike #110

Arlington, VA 2204

April 12, 2013

Ms. Susan L. Conner

Chief, Environmental Analysis Section

U.S. Army Corps of Engineers, Norfolk District

803 Front St.

Norfolk, VA 23510

Dear Ms. Conner,

I am writing to express my concern over the environmental impact of the proposed Millennium expansion project for Arlington National Cemetery. In particular, the massive amount of earthmoving required to position the road in a loop across the stream and steepest section of the site would be seriously damaging to the Arlington House Woods and adjacent wooded area. The woods are a beautiful, dignified, and fitting surrounding for our national cemetery. Arlington House Woods is listed on the National Register. An additional portion of the wooded area involved in the project is a site on the Virginia Native Plant Registry. The transfer by Congress of acreage from the Interior Department to the DOD specified that the contours of the site would be preserved. That isn't happening in the proposed plan.

Why have alternative routes for the road not been explored? Why has a full Environmental Impact Statement not been done? Why the rush to push through this costly and ill-thought design instead of preparing a plan that is appropriate to the topology of the area? The requirements of the NEPA have not been met.

Filling in portions of the streambed, displacing 100,000 cubic yards of soil, and building over 2/3 of a mile of retaining walls that go up to 3 stories in height is a costly project as well as an environmentally damaging one. Better choices—less damaging and less wasteful—have been proposed during the comment period. The alternatives should be properly explored, and the impact of any proposal properly studied.

A number of experts have raised these issues during the EA comment period, but their pertinent and knowledgeable questions and suggestions have been ignored to date.

I urge you to please reassess the environmental impact and proposed alternatives to the Millennium expansion plan, so that the expansion of Arlington cemetery can be done in a beautiful, respectful, and dignified manner that befits both our valiant soldiers and the land where they will lie.

Sincerely,

Nancy Hadley, Arlington resident

Cc: Senator Mark Warner
 Senator Tim Kaine
 Congressman Jim Moran

From: [Dionne Fennell](#)
To: [Conner, Susan L. NAO](#)
Subject: Comment on Revised EA-Mellenium Plan
Date: Monday, March 25, 2013 10:27:20 AM

You can expand the burial capacity and save the woods by redesigning the loop road, and removing the retention wall and columbaria from the old forest. Make the other three columbaria larger, and connect Humphrys road to the "new road" and to Ord and Weitzel road. The revised EA lacks vital information about wildlife the stream aquatic animals and the long lasting environmental impact. We can honor our service member and protect the forest at the same time.

Sincerely,

Dionne Fennell
Washington, DC

From: taarmao@aol.com
To: [Conner, Susan L. NAO](#)
Subject: Comment on the Revised EA for The Millennium Project
Date: Sunday, March 24, 2013 6:55:55 PM

Saturday, March 16 nearly 100 people showed up at Arlington National Cemetery (ANC) for the formal presentation of the Millennium Project (MP.) This project, located on a 27 acre site, was revised from eliminating 890 trees to cutting down 882 trees, a mere difference of 8 trees. U.S. Representative, Jim Moran (VA) asked for a complete, full EIS and I too believe this is necessary. The revised EA states that the "Millennium Project would extend capacity for first-time interments by approximately seven to twelve years." Seven to twelve years is a very short timeframe and unworthy of the destruction of a mature urban hardwood forest, a rare treasure in Northern Virginia and the DC metro area.

The mission of ANC states "On behalf of the American people, lay to rest those who have served our nation with dignity and honor, treating their families with respect and compassion, and connecting guests to the rich tapestry of the cemetery's living history, while maintaining these hallowed grounds befitting the sacrifice of all those who rest here in quiet repose." These sentiments are likewise shared by those who oppose many of the current design elements of this expansion project. Not one person or agency who objects to the design of the project does not also understand, value and respect the service and sacrifice of our veterans and service members.

The design is controversial specifically because the added burial capacity is not properly compared with the loss of a forest ecosystem nor is the recently added 37 acre Navy Annex acquisition considered as an alternative expansion plan to the Millennium Project. The most glaring problem of the current project design is the loop road, retention wall and columbaria that cross over the stream and steep ravine into the old forest consisting of trees with ages ranging from 90-165 years. Some of these living giants are growing from root systems predating European settlement. New tree plantings will never replace the intact forest ecosystem that currently exists--this fact is undeniable. The destruction of the old forest stand that currently acts as a delicate buffer zone places the adjacent old-growth forest directly in the pathway of damage from pollution, storms and wind that will hasten its demise.

Losing nearly 1000 old trees causes forest fragmentation isolating the wildlife and disrupting the nesting patterns of the yet uncounted migratory bird species as they seek to return to the exact same nesting sites year after year. The intact forest is essential for wildlife as it provides food, water, nesting sites and shelter for animals and birds to raise their young. Furthermore the trees are currently being used by a pair of nesting hawks which we clearly saw at the open house Saturday, March 16th. The hawks and many species of birds within the proposed Millennium site have protection by law under the Migratory Bird Act. The EA claims that no eagles nest within the woods however a mated pair was seen flying directly overhead on several occasions. Owls very clearly were heard in the woods on another occasion and conveniently there is no mention of owls in the EA. The EA also noted that the stream was checked for aquatic animals and eggs in February when the research to evaluate the stream for aquatic life should be conducted in spring and summer.

Construction will either kill or drive the wildlife out of the forest. The constant firing of weapons, vehicle traffic and human presence will prevent the wildlife from returning to claim their ancient homes. The EA states the wildlife will return upon the project completion. Losing 880 living and dead tree snags from the Millennium Project makes it likely that the ecosystem and habitat will never recover. In reality some of the wildlife will die while survivors will not be able to return as their habitat will be eliminated.

If the project must be implemented a better plan continues the Humphreys loop road in the south and west corner of the loop. This road skirts right along the tree line, rounding off behind the Old Post Chapel and straight through the historic boundary wall. It joins the main road in the project site right in the area where the design shows the Committal Service Shelter. This revision removes the loop, retention wall and columbaria from the woods above the stream. Additionally if the two remaining columbaria are enlarged and redesigned there is not a loss of capacity for cremated remains in the MP site. The Committal Service Shelter can be relocated to the area where the small fork in the loop road is shown in the current design and this would place the shelter in between the two columbaria's and more

centrally located within the project design. A loop road is maintained in this configuration; it is just a longer loop.

Although stated numerous times at the presentation "that the land was transferred to ANC for the purpose of new burial sites" in fact, nothing is mandated with the land transfer from the National Park Service to ANC. A "No Action Alternative" is indeed one of the options that can and should be chosen. The positive and welcomed changes on the revised EA are the restoration of the stream and the plans to remove invasive plants.

Neighborhoods near the cemetery have seen unprecedented tree loss in the last decade. In 2012 an Arlington County neighborhood lost nearly 1000 trees from VDOT, commercial and county construction projects. Losing another 700-900 trees from The Millennium Project is unacceptable. These ancient trees create oxygen, sequester CO2 and clean our drinking water. We humans as well as the wildlife will suffer from the loss of these trees.

We must not sacrifice a living treasure, this vital centuries old forest ecosystem for a mere few years of extended ANC burial capacity. The land already exists for appropriate cemetery expansion in the Navy Annex site which will create and surpass the new capacity for burials that is currently being sought through the Millennium Project. Please focus cemetery expansion and development to these recently acquired 37 acres and redesign current expansion plans to preserve the remaining trees and forest habitat in Arlington National Cemetery.

Finally we must all acknowledge and accept the fact that Arlington National Cemetery is nearing the point of closure for any new burials. And therefore as U.S. Representative Jim Cooper (TN) and others have proposed, seek a brand-new national cemetery location as a place of honor and beauty for our military heroes.

Terri Armao
Arlington, VA

From: [paul kovenock](#)
To: [Conner, Susan L. NAO](#)
Subject: Comment: opposition to revised EA of design of ANC Millenium Project
Date: Thursday, April 11, 2013 6:18:10 PM

Dear Ms. Conner:

When on March 16 the ANC hosted citizens for a visit to the site of the proposed Millenium Project, I was delighted to observe close-up two Red-Tailed Hawks in the underbrush. But tragically the very habitat the wildlife were exploring would disappear if the recently revised Environmental Assessment is approved.

For those men and women of the armed services who have made so many sacrifices on our behalf, the proposed destruction of historically, environmentally , and aesthetically valuable trees and woodland must be highly distasteful. I understand this destructive Project will only create spaces to accommodate burial for only a handful of years. This short term solution would hardly compensate for the destruction of valuable natural resources. Alternative sites , such as the Navy Annex, the Pentagon Parking lot, and Quantico would meet burial needs without your proposed destruction of old age forest and high degree of ground disturbance.

I oppose the current design of the Millenium Project.

Sincerely,

Paul Kovenock
210 N. Evergreen St.
Arlington VA 22203
(703) 525-5221

From: JKennemer@aol.com
To: [Conner, Susan L. NAO](#)
Subject: Comments on Arlington National Cemetary Expansion
Date: Friday, March 15, 2013 4:26:37 PM

Susan,

I would like to express my opposition to the Millennium Project or the expansion of Arlington National Cemetery as it relates to the destruction of many mature trees over 100 years old and portions of an old-growth forest on the Custis-Lee Mansion property, now known as Arlington House. While I understand the need for additional cemetery plots, the current planned expansion doesn't solve the problem for long and destroys an irreplaceable resource. Additionally, the plans to change the stream in the area impacts the whole ecology of the property. Once an old-growth forest is cut, it can never be regained. Even encroachment up to it, is a bad idea. I am strongly opposed to this plan and hope that a more ecologically friendly solution can be found.

Jan Kennemer
3601 S 6th St, Arl, VA 22204

703-920-2047 voice
703-795-1972 cell

From: [Betsy Washington](#)
To: [Conner, Susan L. NAO](#)
Cc: warner_info@warner.senate.gov
Subject: Comments on Arlington National Cemetery (ANC) Millennium Project
Date: Wednesday, April 10, 2013 10:37:46 PM

Ms. Susan L. Conner

U.S. Army Corps of Engineers - Norfolk District

803 Front Street

Norfolk, VA 23510

Re: Comments on Arlington National Cemetery (ANC) Millennium Project

Dear Ms. Conner:

I have serious concerns about the revised Environmental Assessment (EA) on the proposed Millennium expansion project at Arlington National Cemetery (ANC). It does not take into account alternatives that would be less damaging to the topography and existing old age trees. In particular, Public Law 107-107, Section 2863 (h) (2), which transferred the portions of Section 29 from the Department of Interior to the Department of Defense for purposes of expanding the operations of the cemetery specifically states: "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." Especially troubling is the proposed construction of the loop road that will require a high degree of land disturbance and in-filling which will significantly change the existing topography and eliminate a heavily forested area. The proposed loop road curves across the stream and into the steepest and most heavily wooded section, that is most vulnerable to disturbance, and with the greatest possibility of environmental degradation. Instead if the loop road curved in the opposite direction toward McNair Road, it would result in significantly less land disturbance. The existing wooded section impacted by this plan, should be maintained to provide a critical buffer to the adjacent old growth forest and to provide an aesthetic and appropriate backdrop to the expansion project and cemetery.

Given that the "Millennium project will require significant earthwork", require the displacement of an estimated 100,000 cubic yards of cut and fill soil and require construction of over two-thirds of a mile of

retaining walls up to three-stories tall as stated in the EA, the finding of "no significant impact" is inappropriate. Likewise, the proposal to replant over 800 mature trees lost to construction in this plan, with 600 small trees, will replenish only a small fraction of the eco-system services lost from removing of these old age forest trees. Implying that old age forest trees can be replaced by young saplings is nearly meaningless in an ecological and economic sense.

Alternatives that would be less damaging to the topography and existing old age trees need to be seriously considered. A thorough Environmental Impact Statement needs to be conducted. Redesigning the project to meet the requirements of the law would have a relatively small impact on the longevity of the operations of the cemetery but would have a tremendous impact on saving irreplaceable historical,

ecological and cultural resources. If the columbaria planned for the area to the west of the proposed new access road were expanded in size, the decrease in burial sites could be reduced or eliminated. Alternatives need to be proposed that both extend the operations of the cemetery and yet preserve the contours of Section 29, as required by law. The current proposal does not meet these objectives and produces a very poor outcome. I strongly encourage you to perform a full environmental impact assessment of this short sighted plan, and to push for a solution that both protects the longevity of the cemetery and preserves the surrounding ecological, historical and cultural resources.

Respectfully,

Betsy B. Washington

cc. Senator Mark Warner

From: Carrie3219@aol.com
To: [Conner, Susan L. NAO](#)
Subject: Comments on Arlington National Cemetery Millenium Project EA
Date: Friday, April 12, 2013 12:05:37 PM

To whom it may concern:

Arlington National Cemetery, our nation's premier military cemetery, has a stately location and dignified design that honor those buried there and provide solace and support for their families and other visitors. The cemetery's natural setting and surviving trees contribute greatly to the dignity and stability of this scene. Out of respect for this important landscape, please reconsider Alternative E of the proposed Millenium Project and develop another option that preserves more mature trees and natural contours in section 29.

Specifically, damage to the area's existing natural resources could be reduced by reconfiguring the loop road, refining the site design, and locating more of the proposed support facilities such as restrooms in areas already cleared.

The draft EA makes much of the fact that so many of the trees targeted for removal are slightly less than 150 years old. This should be strong reason to preserve them, not to belittle them and cut them down. In the Washington area, any stand of trees that has survived more than a century is a rarity to be celebrated. These trees in particular, having started life just after the Civil War on slopes with such historic resonance, should be recognized as natural veterans of the nation's recuperation from a devastating conflict, and as living symbols of national unity and durability since 1865. A more sensitive design should be able to preserve more of these trees to shelter and shade additional graves and columbariums, with the more disruptive elements of the expansion relocated or minimized.

There is still time to revise the Millenium Project (and perhaps give it a more modest and suitable name). A modified design can preserve more of the historic character and ecological values of the affected area, honor the intent of the law transferring the property from the National Park Service, and still provide additional resting places for American veterans and their families.

Thank you for considering these comments.

Sincerely,

Carrie Johnson
3219 1st St N
Arlington VA 22201

From: [Sherman Bamford](#)
To: [Conner, Susan L. NAO](#)
Cc: [Sherman Bamford](#)
Subject: Comments on Arlington National Cemetery Millennium Project
Date: Thursday, April 11, 2013 11:39:49 PM

Sherman Bamford

PO Box 3102

Roanoke, Va. 24015-1102

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April 11, '13

Comments on Arlington National Cemetery Millennium Project

Susan L. Conner

Chief, Environmental Analysis Section, U.S. Army Corps of Engineers, Norfolk District,

803 Front Street,

Norfolk, VA 23510

Dear Ms. Conner and Decision-makers:

Arlington National Cemetery is our nation's premier military cemetery. I sincerely believe that by preserving its surroundings, we also protect the dignity of the national cemetery, preserving the natural beauty of Arlington National Cemetery out of respect for those buried there and their families who visit.

I object to Alternative E of the planned expansion known as the Millennium Project and ask you to consider additional alternatives. Alternative E would impact 31% of the area under study containing trees 145 to 165 years old. This is a tremendous loss of older forest in order to extend the viability of the cemetery for only 4-6 years. In addition this area is a critical buffer zone for an even older forested area. Its elimination will endanger that forest, the last old growth forest in Northern Virginia that is over two centuries old.

Historical Impacts

Arlington National Cemetery is one of our nation's most important historical sites, with historical ties that predate the establishment of the cemetery. The site is associated with George Washington's family-members, generals, presidents, and freed former slaves.

Revolutionary war general Lafayette told Mary Custis, the owner: "Cherish these forest trees around your mansion. Recollect, my dear, how much easier it is to cut a tree down than to make one grow." Some four decades later, the occupying Union army hung placards around the largest trees instructing soldiers not to cut them down. (Arlington House Cultural Landscape Report). "In May 1964, the Secretary of Defense ordered that the hardwood forest west of Arlington House, containing 24,436 acres, be preserved in perpetuity, the land maintained in a park-like manner to provide the appropriate setting for the mansion." (Cultural Landscape Rpt., 2001, p. 163). See "Land Record No. 470. May 19, 1964. National Capital Region Reservation File." (Cult. Landscape Rpt. p. 206).

According to Millis et al, 1998, "the stands in the southern portion of the Interment Zone and at the boundary between the Interment and the Preservation Zones are in an area shown as clear-cut on Civil War-era maps... these stands represent mature regenerated forests of the type that likely existed prior to the Civil War. ... Although much of the original forest no longer exists, having been lost to development of ANC and Fort Myer, the mature forest within the Preservation Zone represents the remaining portion of the forest in place during the Custis-Lee period, and the forest within the southern portion of the Interment Zone is representative of a mature forest of that time period. Based on the above, it appears the mature forest stands in the Preservation Zone and in the southern portion of the Interment Zone have retained their integrity and are significantly associated with the Custis-Lee period." (Millis et al. 1998, p. 111). The area referred to as the southern portion of the Interment Zone in Millis et al, 1998, is clearly the same area as that proposed for the loop road, logging/clearing, and other activities in Alternative E. See maps on Millis et al. 1998, p. 98 and Millennium EA, pp. 4 and 39.

The woods (including the 145 year old tract proposed for cutting) are therefore an important part of the historical landscape of the site, a part of the landscape that those of past generations deliberately chose to protect. We would not be paying proper respect to those of past generations if we do not take all appropriate steps to preserve the landscape here.

African-American heritage sites

The woods were a place of refuge for fleeing slaves in the midst of the Civil War. A "Freedman's Village" was constructed some distance away on the estate and was visited by Sojourner Truth for a year. (Arlington House Cultural Landscape Report)

In 2001, Congressman Bobby Scott and Congresswoman Eddie Bernice Johnson objected to an earlier proposal to re-develop Arlington House Woods, which they believed should be preserved "as an historic backdrop to Arlington House." With regard to the historic significance of Arlington House Woods, Congressman Scott and Congresswoman Johnson wrote:

"At risk are more than a dozen 150 year old and 200 year old trees that bore witness to slaves who sought refuge and privacy from their masters and archeological sites that attest to the day to day operation of a plantation supported by slave labor. The loss of these trees and the historic sites would significantly hamper the ability of the National Park Service to help the public understand the Arlington House site and the role it played in slavery and the Civil War. It would also be viewed as a desecration to many within the black community. ... Preserving Section 29 ... would preserve the last living link, close to the nation's Capital, between the Anti-Bellum south and today's African American Community. [Congressional Black Caucus to Rep. Bob Stump, House Committee on Armed Services, Oct. 4, 2001 (emphasis added).]"

The impact of the projects on African-American cultural resources (including those of the Civil War period, and pre- and post-Civil War periods) should have been fully analyzed. These resources should be protected for posterity.

Impacts to Qualities that led to National Register of Historic Places status

The wooded area proposed for cutting is listed by the federal government in the National Register of Historic Places (Arlington House NRHP). See Millis et al. 1998, <http://www.arlingtonva.us/departments/CPHD/ons/hp/CPHDOnsHpHpNrsites.aspx> <<http://www.arlingtonva.us/departments/CPHD/ons/hp/CPHDOnsHpHpNrsites.aspx>> (accessed Apr 11, '13), and <http://www.arlingtonva.us/departments/CPHD/ons/hp/file64807.pdf> (accessed Apr 11, '13)). The NRHP site clearly includes virtually all of the same area as that proposed for the loop road, logging/clearing, and other activities in Alternative E. See maps on Millis et al. 1998, p. 99, <http://www.arlingtonva.us/departments/CPHD/ons/hp/CPHDOnsHpHpNrsites.aspx> <<http://www.arlingtonva.us/departments/CPHD/ons/hp/CPHDOnsHpHpNrsites.aspx>> and Millennium EA, pp. 4 and 39. According to the latter document, a large part of Arlington was maintained as a country estate with an extensive woodland. The agency should protect the qualities that led to the listing in the NRHP (see also above). The agency should disclose whether any of its activities could cause all or part of the site to lose its NRHP status. The agency should have disclosed whether any of its activities would impact those who come to visit the site (Arlington House NRHP) for its historic/NRHP qualities. Locations for these kinds of experiences are diminished in the Northern Virginia area (and are conversely in higher demand because of their scarcity) every time a new development occurs. This is especially the case for irreplaceable resources such as the woods associated with Arlington. The agency should have disclosed whether effects of the proposed activities on the NRHP would be permanent or long-term in nature and warrant an Environmental Impact Statement due to their controversial nature or significant impacts to the human environment.

Impacts to the landscape characteristics of the area

The mature forests proposed for cutting are the most important landscape characteristic within the project area (Millis et al. 1998, p. 111). Throughout Millis et al. 1998, the forests in the Preservation Zone and the forests in the "southern portion of the Internment Zone" are often mentioned together, and are clearly contiguous with one another in the maps in that report. For example, according to the Millis et al. 1998 report, the "vegetation in the project area is noted chiefly by the mature forest stands in the Preservation Zone and the southern portion of the Internment Zone. This vegetation is the most important landscape characteristic within the project area." (Millis et al. 1998, p. 111). Maps of the two Zones (Millis et al. 1998, Appx 3, p. 32) show that the southern portion of the Internment Zone in the study, is virtually the same as the 145 year old northern red oak/chestnut oak forests proposed for cutting/loop road in Alt. E. The 145 year old northern red oak/chestnut oak forest that is proposed for logging/loop road has a "high" level of cultural landscape integrity, the same "high" level as the 200 + year old forest that is contiguous to it (p. 127).

Impacts to watersheds

Only a few miles from the Potomac, the project would also involve extensive ground disturbance in a watershed that is already impacted by run-off from other adjacent federal government properties.

Forest Fragmentation

The agency's brief dismissal of the issue of fragmentation is wholly inadequate (i.e., "the project site is an urban, partially forested site located away from the main body of the existing urban forest so forest fragmentation is minimized. The eastern half of the site on ANC property is heavily forested with dense mature tree growth and this would be retained." EA 114). The degree to which the forested areas would be fragmented, the extent of edge effects, and the impacts on species that depend on forest interior habitat and mature forest interior habitat is not explored. Moreover, cumulative effects and the role of the Arlington Woods and surrounding Section 29 mature/old growth forests are not analyzed. The full, multidisciplinary analysis required by NEPA has not been performed.

Fragmentation is the disruption of habitat continuity and integrity that results from human disturbance, along with the subsequent loss of viable habitat. In tandem with overt habitat destruction, alteration, and conversion, fragmentation is considered the principle threat to biodiversity in our region.[1] Area-sensitive species that have large home ranges or must move between different habitats are especially harmed by fragmentation.

Edge effects occur when distinct habitat boundaries are created by logging, roads, and forest clearing, often resulting in changes of species composition and community structure.[2] Harmful edge effects include an increase in invasive species, drying of the forest floor, facilitation of edge-associated predators such as raccoons and skunks, and an increase in nest predators such as cowbirds. Current scientific knowledge recognizes a potential 600-meter edge effect for predator impacts to bird populations.[3]

One of the most harmful impacts of increased fragmentation is degradation of mature forest interiors and loss of suitable habitat for area-sensitive species, key habitat elements which have a strong influence on species viability.

A full and fair site-specific analysis of the issue of fragmentation at this project area is necessary. Widely-shared and relevant scientific information that shows that logging, road building, and clearing may indeed significantly fragment the forest here, so the issue is not moot (see Noss and Cooperrider, *Saving Nature's Legacy*, 1994; a standard reference on protecting and restoring natural diversity; and Harris, Larry D., and Gilberto Silva-Lopez, 1992, "Forest Fragmentation and the Conservation of Biological Diversity" pp. 197-237 in P. Fiedler and S. Jain, editors, *Conservation Biology: The Theory and Practice of Nature Conservation, Preservation and Management*. New York: Chapman & Hall; both incorporated by reference). See, e.g., Wilcove, D.S., C.H. McLellan, and A.P. Dobson, 1985. Habitat Fragmentation in the Temperate Zone. In: M.E. Soule, ed. *Conservation Biology: The Science of Scarcity and Diversity*. Sinauer Associates, Sunderland, Mass.; Noss, R.F. 1987. Protecting Natural Areas in Fragmented Landscapes. *Natural Areas Journal* 7(1): 2-13; Saunders, D.A., R.J. Hobbs and C.R. Margules. 1991. Biological Consequences of Ecosystem Fragmentation: A Review. *Conservation Biology* 5(1): 18-32; Harris, L.D. and G. Silva-Lopez. 1992. *Forest Fragmentation and the Conservation of Biological Diversity*. In: P.L. Fiedler and S.K. Jain, eds. *Conservation Biology: The Theory and Practice of Nature Conservation, Preservation, and Management*. Chapman and Hall Publishers, New York, NY. pp. 197-238.

Interior forest amounts are unknown and effects to it are glossed-over and not measured. This is a significant issue.

Habitat diversity, dispersion, and fragmentation are issues that are significant for such an area and level of proposed (and past) forest clearing.

The use of the most up-to-date information available needs to be the base for all management decisions — landscape ecology and conservation biology need to be considered. The agency needs to explore the role of the forested areas of Section 29 as a unique island of habitat in the midst of the heavily fragmented Northern Virginia and National Capital Region.

Impacts to Bird Species and Bird Habitat

According to surveys cited in the Environmental Assessment, over 62 bird species, including 18 neo-tropical migratory birds, have been observed in the project area (Appendix D "Forestry Study from Draft Report – Cultural Investigations by Garrow and Assoc). These species include bay-breasted warbler, black-throated blue warbler, black throated green warbler, black and white warbler, blackpoll warbler, hermit thrush, hooded warbler, magnolia warbler, northern parula, ovenbird, Swainsons thrush, and veery.

In addition, the Virginia Fish and Wildlife Information System (VaFWS) says that several tier I or tier II bird species are known or likely within 3 miles of the project area. These include winter wren, Swainsons warbler, cerulean warbler, northern saw-whet owl, black throated green warbler, yellow-bellied sapsucker.

Note: Tier I - Critical Conservation Need; II=VA Wildlife Action Plan - Tier II - Very High Conservation Need

<http://vafwis.org/fwis/?Title=VaFWS+GeographicSelect+Options&poi=38.52.45.4%20-77.04.24.9&dist=4828.032&report=V&placeName=Arlington%20National%20Cemetery%20%28Cemetery%29%3B%20Arlington&lastMenu=Home...By+Place+Name&dt=April+11,+2013+9:52:42PM>
<<http://vafwis.org/fwis/?Title=VaFWS+GeographicSelect+Options&poi=38.52.45.4%20-77.04.24.9&dist=4828.032&report=V&placeName=Arlington%20National%20Cemetery%20%28Cemetery%29%3B%20Arlington&lastMenu=Home...By+Place+Name&dt=April+11,+2013+9:52:42PM>> (accessed Apr 11, '13)

According to the Southern Forest Resource Assessment USDA Forest Research Station, 2002), the following southeastern bird species (mature forest assemblage) are intolerant to urban and suburban development (not a full list): red-eyed vireo, wood thrush, ovenbird, hooded warbler, Acadian flycatcher, scarlet tanager, northern parula, black and white warbler, pileated woodpecker (p. 70). "Forest size and level of fragmentation and the effects on breeding birds – increasing urbanization fragments habitat into smaller and more isolated tracts. Research on breeding forest birds has shown that some species has minimum area requirements. Many studies documented declines in the number of forest breeding migratory birds in small isolated forest patches (Danielson and others 1997)" *ibid*, p. 71).

The discussion section of Appendix D "Forestry Study from Draft Report – Cultural Investigations by Garrow and Assoc [for this project area] states: "According to data presented by Robbins (1989), the probability of detecting forest interior neotropical migrants like red-eyed vireo, wood thrush, scarlet tanager, and ovenbird increases as the area of forest increases. Conversely, a reduction in the size of the wooded ravine wood decrease the probability of occurrence for these area-sensitive species." A study using GIS data sets has shown that "forest interior species and specialists are selecting landscapes with no edges or low-contrast edges, lower number of patch types per unit area, and a greater number of core areas." Villard, M. and B. Maurer, 1996, "Geostatistics As A Tool For Examining Hypothesized Declines In Migratory Songbirds", *Ecology* 77(1) at 63.

Alternative E would eliminate important wooded habitat for neo-tropical migratory birds in Northern Virginia and the National Capital Region, an area that is otherwise highly developed and urbanized. The EA does not analyze the degree of precariousness of bird populations in the forested areas of Section 29, does not incorporate adequate monitoring of existing bird species in the area, and does not fully analyze the impact of the project on bird species or bird habitat for area-sensitive birds.

The cerulean warbler, is an area-sensitive bird (Southern Appalachian Assessment, Terrestrial Report); the cerulean warbler is experiencing the greatest annual decline of any of the warbler species and this significant decline is continuing. Studies have found cerulean warblers chiefly in "large tracts of mature, semi-open deciduous forest." Robbins, Fitzpatrick and Hamel, 1992. The authors of one study, affirm that there is a "need to protect extensive tracts of mature deciduous forest," especially on publicly owned land.

Studies have found cerulean warblers in "large tracts, tall trees, and mature forest." (Cerulean Warbler Status Assessment April 2000). This habitat and adjacent tracts of mature forest may

provide habitat for the cerulean warbler.

The Southern Appalachian Assessment Terrestrial Report lists the cerulean warbler among "area sensitive, mid- to late-successional deciduous forest species" (SAA/TR-70, in the agency's possession, incorporated by reference). It predicts that "based on past trends in land use, it is expected that, over the next 15 years, suitable acreage [for these area sensitive species] and associated forest interior habitats will continue to decrease due to loss of forestland to other uses such as agricultural pasture and development." (SAA/TR-72) The cerulean warbler is found in a variety of deciduous forest types, usually in extensive woods. (Brandt, 1947; Peterjohn and Rice, 1991; Andrie and Carroll, 1988; Brooks, 1908; Mengel, 1965; Cadman et al., 1987; Torrey, 1896; Kirkwood, 1901; Maxon, 1903; Hann, 1937) Most often, its occurrence is recorded in forests with large, tall trees. (Lynch, 1991; Robbins et al., 1989; Wilson, 1811; Oliarnyk, 1996; Mengel, 1965; Andrie and Carroll, 1988; Robinson, 1996; Torrey, 1896; Schorger, 1927) "A change to shorter rotation periods and even-aged management," one of the 6 "chief constraints on the breeding ground" listed in Robbins et al., 1989. The intensive logging proposed in the Wilson Mtn project will eliminate older trees in many of the older stands in this PA.

According to USF&WS, "Ceruleans are routinely identified with large tracts, tall trees, and mature forest. For example, Lynch (1981) indicates minimum habitat requirements of the birds along the Roanoke River of North Carolina "to include: (1.) a closed canopy, (2.) presence of scattered, very tall old-growth canopy trees, and (3) good development of vegetation strata, i.e. distinct zonation of canopy, subcanopy, shrub, and ground-cover layers." (Cerulean Warbler Status Assessment April 2000).

"Over the last 40 years, the Cerulean warbler population has dropped almost 82 percent throughout its U.S. range, making it the fastest declining warbler in the country. To put the decline in perspective, imagine the current U.S. population, which currently stands at 300 million, plummeting to 54 million by 2047. While 54 million peo still constitute a sizeable population, the fast plummet in numbers would be an alarming sign that our population was in danger.

The Partners in Flight program has identified 15 songbirds with habitat in these forests as priority species for conservation, with the Cerulean receiving the highest priority.

This project has the potential to alter or degrade these habitat characteristics in the project area removal of large, old trees that are potential cerulean warbler nest trees in the course of thinning operations, and through other actions.

Negative impacts from deer

What effect this project will have on the existing deer herd is an issue here. The effect is well known and obvious. Deer respond positively to actions that fragment forests and fabricate edge. Deer habitat would increase here from the proposed action. However, more deer can be expected to be attracted to the area due to the increase in favorable conditions. With increased habitat and food, ultimately more deer can be expected. But the analysis must analyze the effect from the deer herd and from the fabrication of conditions favorable to increasing their density. "[W]hitetailed deer have reached and sustained densities across much of the eastern, northern, and southern United States sufficient to cause manifold and substantial ecological impacts." (see "The white-tailed deer: a keystone herbivore", 1997, D.M. Waller and W.S. Alverson, Wildlife Society Bulletin 25(2):217-226; incorporated by reference). The deer's deleterious effects upon herbaceous ground flora are well documented. See "Impacts of white-tailed deer on endangered plants", 1992, S.G. Miller, S.P. Bratton, and J. Hadidian, Natural Areas Journal 12:67-74; "Patterns of plant diversity in overbrowsed primary and mature secondary hemlock-northern hardwood forest stands", 1997, T.P. Rooney and W.J. Dress, Journal of the Torrey Botanical Society 124(1):43-51; "Species loss over sixty-six years in the ground-layer vegetation of Heart's Content, an old-growth forest in Pennsylvania, USA", 1997, T.P. Rooney and W.J. Dress, Natural Areas Journal 17(4):297-305. The effects of the deer herd are not limited to plants; see "Herbivores and the ecology of forest understory birds", 1997, W. McShea in The Science of Overabundance, McShea, Underwood, and Rappole, editors.

Detrimental impacts to plant diversity, viability, and distribution can also occur from the logging, in addition to the impacts from deer. See "Do Appalachian herbaceous understories ever recover from clearcutting?", 1992, D.C. Duffy and A.J. Meier, Conservation Biology 6:196-201; "Possible ecological mechanisms for loss of vernal-herb diversity in logged eastern deciduous forests", 1995, A.J. Meier, S.P. Bratton, and D.C. Duffy, Ecological Applications 5:935-946. Recovery of a plant species distribution can be impeded when habitat fragmentation creates barriers to dispersal: see "Dispersal can limit local plant distribution", 1992, R.B. Primack and S.L. Miao, Conservation Biology 6:513-519.

Impacts to Salamanders

Impacts to site-sensitive creatures such as salamanders are not being properly monitored and assessed. These

creatures are vitally significant components of forest ecosystems. The biomass of salamanders in a northern hardwood forest was twice that of the bird community during the breeding season and nearly equal to that of small mammals (see Burton, T.M. and G.E. Likens, 1975, "Salamander populations and biomass in the Hubbard Brook Experimental Forest, New Hampshire", *Copeia* (1975): 541-546). While in southern Appalachian forests, salamander biomass may exceed that of all other vertebrates combined (see Hairston, N.G., 1987, *Community Ecology and Salamander Guilds*, Cambridge University Press, Cambridge, UK. It is clear that they play key roles in ecosystem dynamics.

Abundant studies reveal the severe impacts of logging upon salamander populations and their preference for older forest sites. See "The Relationship Between Forest Management and Amphibian Ecology", 1995, deMaynadier and Hunter, *Environmental Reviews* 3:230-261 (incorporated by reference). See also "Effects of Timber Harvesting on Southern Appalachian Salamanders", Petranka et al, 1993, *Conserv. Biol.* 7:363-370; "Effects of Timber Harvesting on Low Elevation Populations of Southern Appalachian Salamanders", Petranka et al., 1994, *Forest Ecology and Management* 67:135-147; and "Plethodontid Salamander Response to Silvicultural Practices in Missouri Ozark Forests", 1999, Herbeck and Larsen, *Conservation Biology* 13:3, 623-632) (these are standard journals readily available to the agency).

The agency has not sufficiently examined and considered the potential impacts upon salamanders. Another pertinent study that the agency needs to incorporate in its analysis and decision is "Determinants of salamander distributions along moisture gradients" by M. Grover in *Copeia* 2000 (1): 156-168; incorporated by reference. This concern is particularly important given the intent to destroy, degrade, or fragment salamander habitat (such as the mature forest and rocky areas), these species low dispersal abilities, and the moister areas (including drainages, seeps) targeted for manipulation. Populations could be centered, perhaps even be only found at, the particular places targeted for intense manipulation. They have very small home ranges with limited abilities of mobility. They are susceptible and vulnerable to severe site-specific harm.

This project analysis fails to consider widely-shared and relevant scientific information that shows that salamanders and their reproductive success may be significantly impacted by logging and roading such as proposed for here. This significant issue of salamander monitoring and viability and scientific information were not reasonably considered by the agency. This is a particularly salient concern for the moister areas proposed to be cut here (e.g., in areas with riparian areas, perennial or intermittent or ephemeral streams, or springs and seeps). For information regarding salamander use of headwater stream habitat see

<http://www.epa.state.oh.us/dsw/wqs/headwaters/TechRep_FishAmphibian_2002.pdf> (incorporated by reference). This information needs to be fully considered and incorporated into the analysis. Expanded no cutting or no disturbance zones around stream courses needs to be implemented here.

Old Growth

The agency should protect all existing old growth forest and adjacent mature forest tracts.

Old growth habitat is a rare habitat in the Southeastern U.S. Other federal agencies nearby have taken steps to inventory and protect old growth forest. According to the Forest Service Southern Region's Old Growth Guidance (R8-FR-62) ("RG"), "old growth forests are rare or largely absent in the southeastern forests of the United States. Existing old growth communities may represent around 0.5% (approximately 676,000 acres of the total forest acreage (approximately 108,400,000 acres) in the Southeast (Davis 1996)"

Old growth forest is a rare community listed among "ecosystem communities that have declined by 70 or more in the South since European settlement" as described by Noss et al, 1995 and listed in the Southern Forest Resource Assessment (Southern Research Station, 2002) Table p. 20 Moreover, Early successional forests are very common in the landscape (42% less than 40 years old in Virginia - Rose, A.K. 2009. Virginia's Forests, 2007. USDA FS Resource Bulletin SRS-159.

The EA for this project says that

"Although an exhaustive definition of old-growth forest is not universally agreed-upon, the following characteristics are generally accepted to pertain to an old-growth forest:

- o primary forest status (never been logged)
- o a myriad of ages and species of trees to include both old trees (relative to species and environmental conditions) as well as young saplings
- o snags and logs at various stages of decomposition
- o lack of invasive species invasion
- o lack of disturbance" (p, 110).

There is no consensus that "primary forest status (never been logged)" is a "generally accepted" characteristic of old growth forests, either in the eastern US or in the western US. "What is meant by defining old growth is not always clear... [E]astern concepts of old growth should reflect the size and longevity of eastern species and the successional pathways, disturbance regimes, and perhaps even the extent of past human disturbance." (Tyrrell et al. "Information about Old Growth for Selected Forest Type Groups in the Eastern United States, North Central Forest Experiment Station Gen. Tech Rpt NC-197, 1998, p. 17). Forest Service chief Dale Robertson defined old growth as "ecosystems distinguished by old trees and related structural attribute. Old growth encompasses the later stages of stand development that typically differ from earlier stages in a variety of characteristics which may include tree size, accumulation of large wood material, number of canopy layers, species composition and ecosystem function" (Position statement on NF Old growth values, Oct 11, 1989). None of the definitions of old growth that I have seen state that the forest must have never been logged.

The EA's concept of old growth is deficient in at least three different ways.

(1) It conflates primary forests (forests that “have never been logged”) with old growth. The area impacted by the project is 145 years old (northern red oak) and 145 years old according to the maps in the EA, p. 4. For example, the Forest Service (Region 8) has an old growth survey guidance that says the minimum stand age for the dry-mesic oak forest community type (includes northern red oak and chestnut oak) is 130 years (Forest Service Southern Region's Old Growth Guidance (R8-FR-62)”, p. 10). So, at 145 years old, there is a possibility that it may be old growth. Old growth forest is not necessarily the same as a “virgin” forest, and there are some old growth forests in the East that date to the Civil War or afterwards.

(2) It would eliminate otherwise qualifying stands of older forest because of “invasive species invasion.” (EA p. 110). I support taking proactive steps to eliminate invasive species where possible to protect wildlife habitat and certain values in old growth forests. The problem with the concept in the EA is that it does not recognize that invasive species can be removed from old growth tracts in many cases and it does not specify the degree to which invasive species encroachment might disqualify an area. In addition, ironically the implementation of Alternative E could facilitate the spread of invasives into the 145 year old stands that are proposed for development and it could facilitate the spread of invasives in older (165 yr, 200+ yr) stands due to increased ground disturbance, traffic, logging, and road building closer to these areas.

(3) It doesn't accept the concept that some forest tracts may be in the process of developing old growth characteristics (or soon could be) over time. With old growth forests and forest interior habitat in such short supply in Northern Virginia and the National Capital Region, the agency should prioritize the protection of all late successional forest tracts adjacent (or near) old growth tracts. This is especially the case for forest tracts with a “core” of 200+ yr old forest (such as this one). This will provide for a modicum of old growth habitat in the future – and may be essential for dwindling wildlife and plant populations that depend on this habitat.

The agency has not surveyed existing old growth habitat and late successional habitat in the area. The agency has not even provided full acreage figures for old growth, late successional, early successional, and areas with/without edge effect for the area. Proper NEPA analysis has not been conducted. After all, this is an area with a highly significant historical old growth forest tract.

Inconsistency with Public Law 107-107, Section 2863 (h) (2)

In addition, Public Law (107-107, Section 2863 (h) (2)), the law that transferred the property for this cemetery expansion specifically states that the agency “shall” use the transferred property “for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29”. The movement of 100,000 cubic yards of dirt necessary to complete the Millennium Project would not seem to match the law's direction to Arlington National Cemetery management.

Lack of Adequate Surveys for Biological Resources

Adequate surveys for wildlife, plants, and aquatic species have not been conducted.

A number of species could be impacted by this project, given the significant complex of old growth/mature forest in the area, the proximity of the area to the Potomac River and other aquatic resources, etc. See my comments on bird habitat, above. In addition, the Virginia Fish and Wildlife Information System (VaFWIS) says that several tier I - IV species are known or likely within 3 miles of the project area. These include brook floater, wood turtle, Pizzini's amphipod, spotted turtle, and timber rattlesnake. There are also Virginia Department of Game and Inland Fisheries Wildlife Action Plan Tier I & II Observations within 2 Miles according to the VaFWIS map for this area.

Note: Tier I - Critical Conservation Need; II=VA Wildlife Action Plan - Tier II - Very High Conservation Need ; III=VA Wildlife Action Plan High Conservation Need; IV=VA Wildlife Action Plan - Tier IV - Moderate Conservation Need

http://vafwis.org/fwis/?Title=VaFWIS+GeographicSelect+Options&poi=38.5245.4%20-77.04.24.9&dist=4828.032&report=V&placeName=Arlington%20National%20Cemetery%20%28Cemetery%29%3B%20Arlington&lastMenu=Home___By+Place+Name&dt=April+11.+2013+9:52:42PM
<http://vafwis.org/fwis/?Title=VaFWIS+GeographicSelect+Options&poi=38.5245.4%20-77.04.24.9&dist=4828.032&report=V&placeName=Arlington%20National%20Cemetery%20%28Cemetery%29%3B%20Arlington&lastMenu=Home___By+Place+Name&dt=April+11.+2013+9:52:42PM> (accessed Apr 11, '13)

However, Wildlife Habitat Surveys (and Water Habitat Surveys) for the project either took place many years ago or took place over a few days in February – in the dead of winter. (EA Appendices). Biological surveys should be conducted when species can be detected.

Invasive Species

The EA states that invasive species are already a problem in the area. The analysis does not consider the degree to which this project could worsen the problem in Section 29 and surrounding areas.

Researchers have found that logging, ground disturbance, clearing, removal of forest cover, roadbuilding, and other similar activities create the conditions in which invasives can thrive. For example, logging, clearing, & removal of forest cover simplifies structural diversity and eliminates microhabitats, thus decreasing species richness. As a result, communities are more prone to invasion by one or a few dominant species (Elton 1958). Habitats most likely to have an invasive species presence have been correlated with the following attributes: “vacant niches, lack of biotic constraints (predation, parasitism and disease), lack of community richness (biodiversity & structure), and disturbance.” Logging is known to cause all four factors in forest ecosystems (Mack et al. (2000)). The introduction and spread of invasive species is linked to poor logging practices (poor replanting practices, road construction, & movement via machinery and tools) (Aber et al. 2000). Invasives, and vectors for the spread and introduction of invasives, must be fully considered. Mitigation measures must be established to reduce invasives. Additional alternatives with less disturbance should have been considered to reduce the introduction and spread of invasives.

Researchers have found that logging, clearing, removal of forest cover, roadbuilding, and other similar activities create the conditions in which invasives can thrive. For example, Mack et al. (2000) found that the habitats that invasive species have successfully invaded in the past were qualified to as to their characteristics by Mack et al. (2000). Positive correlations were found between susceptibility to invasion and:

1. vacant niches
2. lack of biotic constraints (predation, parasitism and disease)
3. lack of community richness (biodiversity & architecture)
4. disturbance

All of these phenomena are created in extreme fashion by logging practices.

References:

Elton, 1958. The Ecology of Invasions by animals and plants. London, Methuen.

Mack et al 2000. Biotic Invasions: causes, epidemiology, global consequences, and control. Ecol. Applications 10(3): 689-710

The agency should consider the full impacts of invasive plants in the project and within appropriate cumulative effects area, the degree to which activities (by themselves and cumulatively) will contribute to the spread of invasive plants. The agency has not demonstrated that the mitigation measures effectively eliminate the causes of noxious weed spread. Logging, roadbuilding, clearing, removal of forest cover, and heavy vehicle traffic spread existing weeds, and probably introduce new species of weeds

The agency should have considered all reasonable measures that could reduce the potential spread of invasive species. Failure to consider strong mitigation measures violates NEPA requirements to minimize adverse effects:

Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment. (40 CFR 1500.2(f))

A mere listing of mitigation measures is insufficient to qualify as a reasoned discussion by NEPA. EISs must analyze mitigation measures in detail and explain the effectiveness of such measures [Northwest Indian Cemetery Protective Ass'n v/. Peterson 795 F.2d 688 (9th Cir. 1986)]. Documents do not discuss mitigation measures in adequate detail nor do they discuss or disclose the costs,

effectiveness or efficacy of the mitigation measures. The long-term effectiveness of herbicides and other invasive species treatments are questionable.

The agency is required to comply with presidential Executive Order 13112:

Sec. 2. Federal Agency Duties. (a) Each Federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law,

(1) identify such actions;

(2) subject to the availability of appropriations, and within Administration budgetary limits, use relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them; and

(3) not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

Logging, roadbuilding, ground disturbance, clearing, and removal of forest cover appear to play a role in the known occurrences of invasive species and may play a further role in the presence of yet uninventoried infestations that are out there. Instead, a genuine prevention strategy is needed and this needs to be incorporated into the project.

The premier tool of prevention of new noxious weed invaders deserves the highest priority. Instead, all prevention strategies assume weeds will invade, then prescribe expensive control methods of unknown efficacy after the fact.

Without first significantly reducing the type of soil disturbing activities that facilitate additional encroachment by invasive species, the proposed treatment effects may be negated, indeed, overwhelmed by the spread of weeds caused by more of the same activities. By arbitrarily not considering these measures, the agency must show a genuine, pressing need to risk the ecosystems by applying poisons.

The agency should address the potential spread of invasives from the activities contemplated in the EA. I feel that the introduction and spread of invasives are some of the greatest threats to our public lands, especially in an urban area such as this. In addition to addressing current weed infestations foreseeable, the agency should be focused on stemming the increasing infestation and spread of noxious weeds in the project area. The agency should include measures to limit future ground disturbing and weed spreading activities. The NEPA document should examine and address the most prevalent ways that soil disturbances are created which lead to weed invasions. This should be recognized in terms of costs to the taxpayer, impacts on biodiversity, and the likely need for doing even more invasives control in the future. It makes absolutely no sense to analyze controlling weed invasions that exist now without taking a full and honest look at how to prevent new sites from being invaded. While limiting future land disturbance should be the foremost priority, prevention measures associated with land disturbing activities that do occur should also be outlined in the NEPA document. The past effectiveness of the proposed prevention activities should be discussed.

Road- work, logging, and open woodland creations and other major activities contribute to the spread of invasives & should be fully examined. A comprehensive, integrated policy that specifically includes the halting or significant curtailment of logging, roadbuilding, and other activities that contribute to the spread of noxious weeds should have been considered. The premier tool of prevention of new noxious weed invaders deserves the highest priority. Too often the agency has relied on ineffective stop-gap measures - at the same time it has allowed some of the worst ground disturbing activities to continue.

The NEPA document must meet NEPA's requirements that a reasonable range of alternatives be fully analyzed. Under NEPA, an environmental impact statement must contain a discussion of "alternatives to the proposed action" [42 U.S.C. 4332(2)(D)]. As interpreted by binding regulations of the CEQ, an environmental impact statement must "(r)igorously explore and objectively evaluate all reasonable alternatives" [40 C.F.R. 1502.14(a)]. The importance of this mandate cannot be downplayed; under NEPA, a rigorous review of alternatives is "the heart of the environmental impact statement." 40 C.F.R. 1502.14. Similarly, case law has established that consideration of alternatives that lead to similar results is not sufficient to meet the intent of NEPA. [Citizens for Environmental Quality v. United States, 731 F.Supp. 970, 989 (D.Colo. 1989); State of California v. Block, 690 F.2d 753 (9th Cir. 1982).]

NEPA regulations at 40 CFR B 1502.4(a) state:

Agencies shall make sure the proposal which is the subject of an environmental impact statement is properly defined.

And at 40 CFR B 1508.25, NEPA regulations state:

Scope consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement. . . . To determine the scope of environmental impact statements, agencies shall consider:

(a) Actions (other than unconnected single actions) which may be:

(1) Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they:

(i) Automatically trigger other actions which may require environmental impact statements.

Additional mitigation should include funding to treat the invasive species infestation in the remaining National Park Service portion of Arlington House Woods. Any disturbance in this area is going to further stress the remaining section of woods and additional mitigation efforts are need to protect what little remains.

Conclusion

With the pending opening of a new columbarium and the completion of the transfer of the Navy Annex grounds for use by Arlington National Cemetery there is still time to revise the planned expansion. A new plan will preserve both the character of the grounds, honor the intent of the law, and consider other alternatives that minimize the impacts to the quiet solitude, the ecological and cultural resources of the area while still providing additional burial spaces for this area's most hallowed grounds.

Arlington is too significant a place to disturb without a more thorough environmental study, especially when other unstudied, viable alternatives could better protect the area. I believe there are alternatives that could minimize the impact in the 145 + year old forest while still providing additional burial space.

The agency's preferred route for the loop road curves across the stream and into the steepest and most heavily wooded section, requiring extensive logging, ground disturbance, and infilling. The law that transferred the property for this cemetery expansion specifically states that the agency "shall" use the transferred property "for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." (underlining for emphasis).

I would like to see the agency consider an alternative in which the loop road curves away from the forest and towards McNair Road, as well as other alternatives that minimize the impacts to the surroundings and the ecological and cultural resources of the site.

Sincerely yours,

Sherman Bamford

[1] See Soule, Ritters et al 2002. Soulé, Michael E., editor. 1986. Conservation Biology: The Science of Scarcity and Diversity. Sunderland, Mass.: Sinauer Associates, Inc.

Ritters, K.H. et al. 2002. Fragmentation of Continental United States Forests. Ecosystems (2002) 5: 815-822.

[3] See Leimgruber et al and Wilcove, D.S. Leimgruber, P., W.J. McShea, and G.D. Schnell. 2000. "Roadside Surveys: Changes in Forest Composition and Avian Communities with Distance from Roads". Wilcove, D. S. 1988. "Forest Fragmentation as a Wildlife Management Issue in the Eastern United States", paper in Richard M. DeGraaf and William M. Healy, compilers. Is Forest Fragmentation a Management Issue in the Northeast? Rochester: Society of American Foresters.

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From: [Bernard H. Berne](#)
To: [Conner, Susan L. NAO](#)
Subject: Comments on March 2013 Environmental Assessment for Millennium Project at Arlington National Cemetery
Date: Friday, April 12, 2013 8:33:47 PM

This environmental assessment (EA) is inadequate. The EA does not support a Finding of No Significant Impact (FONSI). A full Environmental Impact Statement (EIS) is required.

The EA does not describe the legal basis for the transfer of the interment zone in Section 29 of Arlington National Cemetery from the Secretary of the Interior to the Secretary of the Army, as specified in the National Defense Authorization Act for Fiscal Year 2002 (Public Law 107-107). Further, the EA does not describe the provisions in the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6), approved by the President on March 6, 2013, that appropriated funds for the Millennium Project. It is not possible for anyone to provide an informed response to the EA without this information.

Public Law 107-107, Section 2863 (h)(1) required the Secretary of the Interior to transfer jurisdiction over the interment zone to the Secretary of the Army within 30 days of the law's enactment. Public Law 107-107, Section 2863 (h)(2) requires the Secretary of the Army to use the interment zone for below-ground burials and columbarium.

However, Public Law 107-107 does not provide the date by which the Secretary shall begin to use the interment zone for burials and columbaria. Although not anticipated when Congress enacted Public Law 107-197, the Navy Annex is now available for such uses.

It is therefore neither logical nor environmentally acceptable for the Army Corps of Engineers to destroy at this time over 800 trees as part of the Millennium Project. Many of these trees are in a 145 year-old woodland in Section 29. Other trees are within in former Fort Myer picnic grounds and in other parts of Section 29. Arlington National Cemetery needs to fully utilize the Navy Annex for burials and columbaria before considering the use of any part of Section 29 and the former Fort Myer picnic grounds for burials and columbaria.

At this time, the "No Action" alternative is therefore the only acceptable Preferred Alternative. As I stated in my response to the December 2012 EA, adequate space is available within the Pentagon's parking lots to accommodate an expansion of Arlington National Cemetery that will satisfy the Cemetery's needs for many years. If necessary to adequately defend the Nation, the Secretary of Defense can construct multilevel parking structures to replace any needed surface parking spaces that are allocated to the Cemetery's expansion.

The March 2012 EA responded to my comment by stating that the Army is studying new areas for cemetery expansion. The response did not specifically discuss the Pentagon's parking lots as possible locations for this expansion. The response was therefore incomplete and inadequate. The EA therefore needs to fully address this issue before the Army Corps of Engineers proceeds any further with its plans or issues a FONSI..

In addition, the EA needs to fully discuss the "No Action" alternative. The discussion should recommend that the Secretary of the Army should ask Congress to repeal the provisions in Public Law 107-107, Section 2863 (h)(1) and (h)(2), thus transferring jurisdiction over the interment zone back to the Secretary of the Interior and removing the requirement that the interment zone be used for below-ground burials and columbarium. The discussion should also recommend that the Secretary of the Army ask Congress to require the Secretary of Defense to identify other areas (including the Pentagon's parking lots) that would be suitable for the Cemetery's expansion. Additionally, the discussion should recommend that the Secretary of the Army ask Congress to authorize the Secretary of Defense to transfer jurisdiction of all such suitable properties to the Secretary of the Army, to be used for the future expansion of Arlington National Cemetery. The National Defense Authorization Act for Fiscal Year 2014 or for a future Fiscal Year can contain provisions that will implement the above recommendations.

The needless destruction of over 800 trees, many of which are in a 145 year old woodland within a

highly urbanized area, clearly constitutes a significant environmental impact. A FONSI is completely unsupportable under such conditions, especially when the "No Action" alternative is both feasible and preferable.

If the Corps of Engineers does issue a FONSI, the Corps should assure that two large black cherry (*Prunus serotina*) trees (Tag Nos. 1025 and 1026) in Fort Myer are preserved and protected if they are healthy. The Tree Analysis and Inventory in Appendix I of the EA states that these living trees will be removed, that 1025 has a 33 inch diameter and that 1026 has a 41 inch diameter.

I have examined these trees, which are near each other and are not far from the Fort Myer wedding chapel. No. 1026 has a diameter that, while not a record, is unusually large for this species in Northern Virginia. An oak has intruded itself into the base of 1026. Although the main trunk of the oak has been cut, the oak is still alive and sending up shoots. The oak needs to be killed to help preserve 1026.

Further, both trees are near the site of the former Arlington station of the Fort Myer branch of the Washington, Arlington and Falls Church Railway, which was an electric trolley line that served both Fort Myer and the Cemetery. As there are no large black cherry trees nearby, they may have been planted by the railroad company, which started operations in the 1890's and closed during the Great Depression in the 1930's. Thus, the trees may be historically significant as a remnant of the trolley line. (See : Merriken, John E. (1987): *Old Dominion Trolley Too: A History of the Mount Vernon Line*. Edited and published by Leroy O. King, Jr., Dallas, Texas. ISBN 0960093826, for more information about the trolley line and the station.)

It may be necessary to change the planned grading near 1025 and 1026 in order to save the trees. Alternatively, the trees can be protected by constructing one or two wells with large diameters that will protect the trees if the ground level of the project in the area will be higher than the present ground level. There are no structures now planned in the area near the trees.

As an additional comment, others have stated that a rerouting or a reduction in the width of a planned circular road serving the planned columbaria can save trees in the interment zone. If this is correct, the Army Corps of Engineers should revise the plan for the road.

Bernard H. Berne
4316 N. Carlin Springs Road, #26
Arlington, VA 22203-2035

From: [Sally Greenhouse](#)
To: [Conner, Susan L. NAO](#)
Cc: taarmao@aol.com
Subject: Comments on proposed design to the Arlington National Cemetery Millennium project
Date: Tuesday, March 26, 2013 7:01:40 PM

I am a resident of Arlington County, 723 So Adams Street - 22204, and have been since 1964. I have witnessed the enormous growth of Arlington National Cemetery over those years, with a concomitant reduction in the natural landscape. I urge you to consider alternatives to the destruction of so many more of the old growth trees as currently proposed. Surely the Army Corps of Engineers can devise a plan that would better preserve more of our cherished landscape, a landscape which contributes significantly to the environment for which Arlington County has been justly proud. I suspect that the alternative provided by taarmao@aol.com <<http://mail.aol.com/37605-111/aol-6/en-us/Suite.aspx#>> would not only reduce the extent of destruction to our trees, but would also be less costly -- a not insignificant consideration during these times of constrained financial, tax-based resources.

Sally Greenhouse
sllygreen@aol.com

From: [frazmo](#)
To: [Conner, Susan L. NAO](#)
Cc: [Caroline Haynes](#); [Nancy Vehrs](#); [Alan Ford](#); [Joy Oakes](#)
Subject: Comments on the Revised Design and Environmental Assessment for the Arlington National Cemetery Millennium Project
Date: Thursday, April 11, 2013 10:32:13 PM

(By e-mail) 11 April 2013

Susan.L.Conner@usace.army.mil

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Ms. Conner:

I write on behalf of the Potowmack Chapter of the Virginia Native Plant Society to offer comments on the current design for the "Millennium Project" expansion of Arlington National Cemetery and the associated Environmental Assessment.

We honor the service of our veterans and respect the sacrifices made by their family members. Many of us have relatives and relatives of our friends buried at ANC and eligible for interment there. And we understand that the Cemetery is running out of sites for burials.

However, it pays no honor to our veterans to destroy irreplaceable environmental and historical resources in order to create a few more gravesites. The Virginia Native Plant Society has designated the Arlington House Woodlands as a Registry Site, a unique ecosystem (see: <http://vnps.org/wp/conservation/know-your-vnps-registry-sites/>).

Arlington County inventoried natural areas in ANC for its 2008 Natural Heritage Resource Inventory. Only 738 acres, 4.7% of Arlington's total land area, could be considered to fall under the "natural area" category. In 2010 Arlington committed in its Natural Resources Management Plan to a "no net loss" policy for its remaining natural areas (see: <http://www.arlingtonva.us/departments/parksrecreation/documents/file76445.pdf>). While Arlington County does not administer Federal lands such as ANC, we believe that respect should be given to the no-net-loss policy and recognition afforded that the Millennium Project as currently designed would destroy a significant part of Arlington's very limited remaining natural area.

I would also note that, at the March 16 Open House that ANC conducted, colleagues and I were struck by the large number of native birds we observed in the project area. Clearly, the woods that would be destroyed are important bird habitat, and removing the large number of trees would have negative impacts that could violate the Migratory Bird Treaty Act.

We are not convinced that adequate environmental analysis has been conducted of the project impacts and potential better alternatives.

My review of publicly available aerial imagery indicates that the adjacent Fort Myer property appears to have substantial areas that are topographically well-suited for gravesites, already disturbed (low remaining natural resource value), and potentially amenable to being made available for burials. ANC should explore creative options to re-purpose some of these Fort Myer areas, just as the former Naval Annex is being converted.

In closing, the current design and the current Environmental Assessment are unacceptable and should be rejected. The current project design, with its large-scale destruction of natural and historical resources, would dishonor our veterans. They deserve much better. It is obvious that creative

alternatives can be developed that would have no net loss to natural areas and potentially be more cost-effective to construct, as well.

Thank you for your consideration of these comments.

Sincerely,

Steve Young

Vice President

Virginia Native Plant Society, Potowmack Chapter

5617 5th St S

Arlington VA 22204-1206

Email: frazmo@gmail.com

Tel: 703-578-4419

From: [Farrah Dang](#)
To: [Conner, Susan L. NAO](#)
Subject: Comments on the revised March 2013 EA, Millennium Project
Date: Friday, April 12, 2013 2:28:15 PM

Dear Ms. Conner,

Thank you for this opportunity to comment on the revised Environmental Assessment for the Arlington National Cemetery (ANC) Millennium Project. This project is of great personal significance to me. I have deep conviction in environmental stewardship while also having close family and friends who were impacted by--or involved with--military conflict. My concern with the project as it stands now is twofold.

First, the plan still calls for major disruption of historical land and mature forest community, which will be a detriment to the ecology of our region. Current construction plans, as stated on page 95, will require "significant earthwork"—100,000 cubic yards of cut-and-fill disruption and bulldozing of land which includes a stream bed. This plan is in legal defiance of Public Law 107-107, Section 2863 (h) (2), which states that "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." The plan deems the species diversity of the site's native flora/fauna as non-unique in strictly quantitative terms. However, the plan's small scope fails to regard the land as part of a larger metropolitan area, whose lands are under constant development and homogenization. Additionally, the expansion will extend cemetery operations for another few years (12, max, by the plan's own estimates) before the cemetery reaches full capacity again.

Then there is the lack of formalized input at the ground level. There are a couple of things absent from the EA report: The exact inventory and cost of replacement trees and shrubs, their long-term maintenance plans, soil impaction, long-term cost comparison between high-impact and low-impact plans, and a survey of veterans' unique preferences and ideas. Through online comments, articles, and verbal anecdotes, veterans and area residents have presented alternative ideas like tree dedications, communal burials, and wooded park space for families. For instance, Charles Bennett, a World War II veteran, stated, "I'd rather be pushing up flowers than occupying a space for the living" ("A Communal-burial Alternative As Arlington Fills Up," Chicago Tribune). While the plan can be praised for its efficiency and speed, the lack of long-term vision and consensus is too great to be ignored.

Thank you again for taking my input on the Millennium Project. I have faith in our engineering prowess to innovate a solution that honors the veterans and the richness of the land that they fought so hard to protect.

Sincerely,

Farrah Dang, Arlington resident

COMMENTS ON DRAFT MILLENNIUM PROJECT ENVIRONMENTAL ASSESSMENT

By Michael Nardolilli

1. Avoid an Expensive Temporary Fix. Wasteful government spending --- even for a noble cause --- is still wasteful government spending. The Preferred Alternative (“Alternative E”) of the Draft Millennium Project Environmental Assessment (“EA”) calls for the removal of “732 ... healthy native trees” [EA at 5] at a 27-acre site in Arlington National Cemetery (“ANC”) in order to “extend capacity for first-time interments by approximately seven to twelve years” [EA at 18]. Because “[a]pproximately 60% of the site has steep slopes (defined as slopes >15%)” [EA at 58], Alternative E will require the cut and fill of 150,000 tons of earth and the construction of over a half-mile of retaining walls, some as high as three stories [EA at 95]. The use of fill also means a considerable delay between the completion of construction and use of the site to allow for the settling of the soil. Moreover, over a quarter-mile “of the historic Seneca sandstone boundary wall of ANC would be demolished” [EA at 127-28]. Not surprisingly, this amount of site work does not come cheaply. “The magnitude of construction for this project is between \$25,000,000.00 and \$100,000,000.00” [Army Solicitation W91236-13-R-0012]. Accordingly, the Millennium Project is a very expensive, temporary (and not immediate) fix to the long-term problem of ANC capacity that will have serious environmental and historical consequences. These funds would be better used to fund the acquisition of flat, vacant land (such as a large farm) for the creation of an “Arlington West Cemetery” or some other permanent, less costly solution.

2. Control Phosphorous & Nitrogen. The stream restoration project does not adequately tackle two of the three pollutants of concern to the Chesapeake Bay. While Alternative E provides for much needed (and long-overdue) stream restoration at the site, that solution will address only one of the three “pollutants (i.e. total nitrogen, total phosphorus, and total suspended solids) to downstream receiving waters” [EA at 61]. While Alternative E is predicted to reduce total suspended solids substantially, the stream restoration will have only minor impacts on reducing nutrients (nitrogen and phosphorus) [EA at 103]. The Cemetery needs to make a significant reduction in the total amounts of nutrients carried off of all ANC grounds by stormwater. Accordingly, Alternative E should include a requirement for turf management plans for 75% of the entire Cemetery with a goal of reducing the Total Maximum Daily Loads of nitrogen and

phosphorous by 5% during the next five years. This would match Arlington County's obligations under VDPES Permit No. VA 0088579 (draft) as required by the Commonwealth's federally-approved Watershed Implementation Plan.

3. Place the Restored Stream Valley Under Permanent Conservation Easement. An "indefinite" benefit is no benefit. Alternative E "provides the local area with a large green space to remain *indefinitely* amidst a very urbanized area" [EA at 140] [emphasis added]. As the primary environmental benefit of the project, this green space should be permanently, not indefinitely, preserved. Accordingly, the area of the restored stream valley should be placed under permanent conservation easement with the Virginia Outdoors Foundation or some other land trust in order to guarantee third-party oversight. This would match the policy of the Army Corps of Engineers Norfolk District to encourage the placement of third-party permanent conservation easements over the restored waters and nearby lands in stream mitigation banks.

4. Mitigate Impacts By Rerouting the "Loop Road." A major alternative has not been analyzed. Alternative E envisions the creation of a new "Loop Road" which would begin at Ord & Weitzel Drive, curve around the proposed Committal Service Shelter at the head of the stream, and then turn northwest to cross the stream and join up with the proposed road, thus making a "Loop." This stream crossing would require a significant loss of trees and the construction of a large bridge over the main stream [EA, Appendix C at 4]. In addition, this bridge would interrupt the view down the stream valley from the proposed Committal Service Shelter, the design of which is to "provide a location suitable to view the entire vista" [EA at 36]. Instead of turning northwest to connect the Loop, however, the Loop Road should be re-routed to turn southeast and connect to the existing road network near the Superintendent's Lodge, thus avoiding the need for this bridge altogether. This approach saves trees, improves the vista and "respects the existing stream" [EA at 37]. Unlike the other Alternatives examined in the EA, this change would neither require the processions to "come through the back door" (through Fort Myer) nor double back on themselves. To make the change in grade a more gradual slope, the proposed Columbarium and Committal Service Shelter at the southern end of the site could be built at a higher elevation. Significantly, this alternative route for the Loop Road was never analyzed in the EA. At the very least, this proposal should be seriously considered by calculating the amount of tree loss, stream impact and cost factors for this option as compared with Alternative E. Accordingly, either the Loop Road should be re-routed to avoid the stream crossing and connect with the existing road network near the Superintendent's Lodge or the EA should provide a detailed explanation as to why it is not feasible to do so.



**ARLINGTON COUNTY
PARK AND RECREATION COMMISSION**

2100 Clarendon Boulevard, Suite 414
Arlington, Virginia 22201



Ms. Susan L. Conner
U.S. Army Corps of Engineers - Norfolk District
803 Front Street
Norfolk, VA 23510
susan.l.conner@usace.army.mil

RE: Comments on Revised EA for Proposed Millennium expansion at Arlington National Cemetery

Dear Ms. Conner:

Please consider the following comments from the Arlington County Park and Recreation Commission with respect to the revised draft Environmental Assessment (EA) on the proposed Millennium expansion at Arlington Cemetery, released on March 12, 2013.

In adopting legislation for the transfer of the section of Arlington Woods from the Department of the Interior to the Department of Defense, Congress recognized the importance of designing a project that preserves the existing natural woodland as an historical and ecological backdrop both to the Arlington House–Lee Mansion and to Arlington National Cemetery. As currently proposed, the Commission does not believe that the project meets the requirement of PL 107-107, Section 2863 (h)(2) that states “The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium *that are designed to meet the contours of Section 29.*” (italics added).

We believe that it is possible to *both* expand the longevity of the operations of Arlington National Cemetery while also meeting the requirements of the law that the design follow the contours of the land. We are especially concerned about the proposed loop road into the steep ravine area and across an existing streambed and seep.

The EA notes that “The Millennium project will require significant earthwork”, with over two-thirds of a mile of retaining walls up to three-stories high, and over 100,000 cubic yards of cutting soil and infilling the land (EA p. 95). This fact in itself is strong evidence that the project design is not in line with the intent of Section

2863(h)(2). Further, we continue to question the determination of “no significant impact” and why a full Environmental Impact Statement on the project has not been completed. Additionally, we question why design alternatives that meet the contours of the land were not addressed in either the original or revised EA.

We appreciate the pressure to expand the longevity of Arlington National Cemetery and the importance of honoring our veterans. However, we believe that an alternate design can accomplish that objective without dramatically changing the topography of the existing land. Design alternatives that reroute the proposed loop road away from the stream bed and steep ravine and toward the more gently sloping north-western section of the property should be considered or an explanation given as to why they were not.

We urge that the design of this project be revised to meet the requirements of the law.

Sincerely,

A handwritten signature in black ink that reads "Neal Sigmon". The signature is written in a cursive, flowing style.

Neal Sigmon
Former Chairman and Member

cc: Arlington County Board
Arlington County Manager
Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran
National Capital Planning Commission
Secretary of the Army

From: [Thelma Vickroy](#)
To: [Conner, Susan L. NAO](#)
Subject: design changes made to the Arlington National Cemetery Millennium project
Date: Friday, April 12, 2013 8:25:34 PM

Dear Ms Conner,

I support the saving of the old growth trees at Arlington National Cemetery. The forest not only provides a necessary eco system in the Arlington Virginia area but it provides the appropriate setting to honor our war heroes. I believe many other options should be taken then to cut trees.

Thank you for your time,

Sincerely,

Thelma Vickroy
1037 New York Drive #4
Altadena, CA 91001

ENVIRONMENT AND ENERGY CONSERVATION COMMISSION

c/o Department of Environmental Services

2100 Clarendon Blvd., Suite 705

Arlington, VA 22201

April 11, 2013

Ms. Susan L. Conner
U.S. Army Corps of Engineers - Norfolk District
803 Front Street
Norfolk, VA 23510

Re: Comments on Arlington National Cemetery (ANC) Millennium Project

Dear Ms. Conner:

The Arlington County Environment and Energy Conservation Commission reviewed the draft and the revised Environmental Assessment (EA) of the ANC Millennium Project. The Arlington National Cemetery (ANC) Millennium expansion project can be designed and constructed to allow expansion of the cemetery *and* preservation of forested land with high historical and ecological value.

The revised EA and attached reports shed better light on the impacts to forested areas; however, we are not convinced that the Corps' proposal is adequate to conclude the EA with a Finding of No Significant Impact. There exists an obvious less environmentally impactful alternative that meets the project purpose. Moving the loop road to the more gentle topography adjacent to Ft. Myer could accomplish the goal of providing additional burial and interment space without requiring the removal of old trees in the steep ravine and without relocating an existing stream.

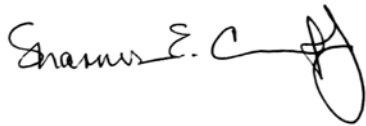
Replacing 732 native trees, many of which are 145 years old with 600 new, young, small trees and 500 shrubs is insufficient given their different ecological and aesthetic characteristics. On April 10, 2013, you sent out an email indicating that the completed vegetation survey found an additional 23 trees that would need to be removed and promised one-for-one on site replacement. This project change is not sufficient to address the loss of mature trees, their habitat value, and the numerous ecological functions they perform. If the Corps feels that there is not sufficient room for additional trees on site, then we suggest working with the National Park Service and the Arlington County Forester to identify other public or private sites where planting could occur. A commitment to fund removal and management of invasive species from forested parklands across the county should be considered as part of the mitigation plan to offset loss of habitat value.

The geological study included in the revised EA identifies a seep in the project area (EA p. 64). Seeps around the county support unique assemblages of plant and animal species. A redesign of the loop road could avoid construction in the vicinity of the seep.

As currently designed, the proposed project will require over two-thirds of a mile of retaining walls of up to three-stories high and cutting and filling over 100,000 cubic yards of soil (EA p. 95). Specifically, the construction of the loop road into the steep ravine and across a streambed will require a high degree of land disturbance and infilling which will significantly change the existing topography. The Corps EA commits to construct stormwater management measures to compensate for increases in the quantity and degraded water quality of run off; such mitigation is fundamental to mitigate significant impacts to local and Chesapeake Bay water quality. Arlington County has been making significant investments in ensuring careful site designs, enhancing storm water management, and advancing wastewater treatment to improve local and Chesapeake Bay water quality. Therefore, we note with considerable concern, that the EA concluded that none of the project alternatives fully met Chesapeake Bay Preservation criteria.

We are aware that many other organizations remain concerned that the proposed project does not meet the requirements of the Public Law 107-107, Section 2863 (h)(2) which states “The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium *that are designed to meet the contours of Section 29*” (italics added). This restriction helps to preserve not only the historic character and viewshed of the cemetery, but also to reduce runoff from the constructed and graded portions of the site.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon E. Cunniff", with a stylized flourish at the end.

Shannon Cunniff

Chair

From: sylvatica9@juno.com
To: [Conner, Susan L. NAO](#)
Subject: Expansion of Arlington Cemetery, Millenium Project (Comments)
Date: Friday, April 12, 2013 9:54:49 AM

Hello,

I am writing to express my opposition to this project as planned. Arlington County and the region's residents are in great need for improved water and air quality through the preservation of trees, woodlands and streams.

This project is planned to remove a large area of trees, many very mature, and to substantially impact an existing stream. Happy to see a portion of it restored....but also it is being impacted notably in other areas.

I would be interested to see a preliminary grading plan of the proposed project, should it become available to the public for viewing.

Thank you for your consideration on this matter.

Jessica Strother, 4508 N. 18th Street, Arlington, Va 22207 h) 703-323-5278

Woman is 60 But Looks 25

Mom publishes simple facelift trick that angered doctors...

< <http://thirdpartyoffers.juno.com/TGL3132/516811e8a684611e8735ast04duc> > ConsumerLifestyles.net

< <http://thirdpartyoffers.juno.com/TGL3132/516811e8a684611e8735ast04duc> >

Friends of Arlington Parks

April 11, 2013

Ms. Susan L. Connor
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front ST
Norfolk, VA 23510

Re: Arlington National Cemetery Millennium Project

Dear Ms. Connor:

Friends of Arlington Parks (FAP) is a volunteer organization dedicated to preserving Arlington's remaining natural areas. Most of those are found in County parks, but there are also important natural areas on land owned by the Federal Government and the State of Virginia.

We would like to comment on the proposed Millennium expansion project at Arlington National Cemetery. As currently planned, that project will involve extensive earthmoving activities and construction of retaining walls in areas that currently consist of old age forest. Every effort should be made to preserve these unique ecological resources, and that will require careful evaluation of suggestions for alternative designs.

Under the current plan, grading activities are significantly increased by building a loop road across the stream valley. It has been suggested that the loop road be redesigned so that it does not cross the stream, but instead passes through the section closest to Ft. Myer. This option appears to offer a way of significantly reducing damage to Arlington House Woods, while meeting the operational objectives of extending the longevity of the Cemetery. FAP urges careful study of this option.

The best way to fully evaluate alternative approaches to the Millennium project would be to prepare a full-fledged Environmental Impact Statement (EIS), with meaningful input from the public and other stakeholders, instead of the existing Environmental Analysis. The ecological and historical significance of Arlington House Woods fully justifies the extra effort involved in preparing the EIS.

Thank you for considering our suggestions.

Suzanne Bolton

President, Friends of Arlington Parks

cc: Arlington County Board
Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran



HISTORICAL AFFAIRS AND LANDMARK REVIEW BOARD

Courthouse Plaza One 2100 Clarendon Boulevard, Suite 700 Arlington, VA 22201

TEL 703.228.3830 FAX 703.228.3834 www.arlingtonva.us

April 12, 2013

Ms. Susan L. Conner

Acting Chief, Planning and Policy Branch U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Re: Arlington National Cemetery Millennium Project Draft Revised Environmental Assessment

Dear Ms. Conner,

The Arlington County Historical Affairs and Landmark Review Board (HALRB) appreciates the opportunity to comment on the Draft Revised Environmental Assessment of March 2013. After reviewing the Draft Revised Environmental Assessment (Revised EA) and participating in the March 16 Site Visit, the HALRB continues to have concerns about the impact of the Arlington National Cemetery Millennium Project (Millennium Project) as presented in the Revised EA on historic, cultural, and other resources in the area of the proposed Millennium Project site. A primary concern arose during the Site Visit, when only the preferred Millennium Project design was presented and open to discussion. The Revised EA, moreover, essentially summarily dismisses alternative designs that are not only more historically and environmentally sensitive than the preferred design, but are likely to provide more burial sites.

Throughout the Revised EA, references are made to adverse impacts and long term impacts of the Millennium Project preferred design. It is concluded, on the basis of what appears to be little, or, at best, only superficial review, that these impacts are not significant. The acknowledged number and scope of these adverse and long term impacts alone, even without a review of their specific nature, clearly support the need for the additional investigation, review, and analysis that would be provided by conducting, as required by the National Environmental Policy Act and other federal statutes, a more extensive analysis and full Environmental Impact Statement for this project.

Of additional and particular concern to the HALRB are the Seneca Sandstone Boundary Wall and the Arlington House Section 29 forest, both of which are identified in the Revised EA as subject to adverse effects as a result of the Millennium Project. The Seneca Sandstone Boundary Wall, identified as a contributing structure in the National Register of Historic Places nomination, is part of the original landscape design for the cemetery and was constructed in the 1870s, which is acknowledged on pages 80-81 of the Revised EA. Yet the Millennium Project dismisses the historic significance of the Seneca Sandstone Wall and includes a new boundary wall. The proposed reuse of materials from the demolished historic wall, asserted to mitigate and resolve this "adverse effect to the ANC historic district landscape" is, contrary to the proposed Finding of No Significant Impact (FONSI), a very significant impact and requires, at a minimum, the more extensive review provided by an

Environmental Impact Statement. The loss of the historic context provided by the Seneca Sandstone Boundary Wall cannot be replaced by simply incorporating salvaged materials into a new relocated wall. Project alternatives that retain Seneca Sandstone Boundary Wall in place and do not require demolishing a significant portion of this historic resource exist, but do not appear to have been considered.

The Revised EA states that 2.63 acres in the 145-year-old tree stand of the Section 29 Forest would experience adverse effects and be impacted by the Millennium Project, primarily because these trees would be removed. It is further stated that 732 healthy native trees are to be replaced with 600 trees and 500 shrubs. Although not directly within the Arlington Woods boundary, this 2.63 acre stand, with its substantial number of trees that have grown for almost a century and a half, is not an entity distinct from Arlington Woods. The removal of such a large number of 145-year-old trees and their replacement with fewer very young specimens could significantly affect the viewshed from Arlington House and Arlington House Woods. This impact is notably absent from the Revised EA. In addition to potential adverse effects on the historic resources represented by Arlington House and Arlington Woods, the environmental impact of replacing 732 mature trees with 132 fewer young trees and shrubs requires the analysis afforded by an Environmental Impact Statement.

In the Revised EA, as in the earlier draft EA, Alternative F, which is more historically and environmentally sensitive and would result in less impact to the identified historic, cultural, and environmental resources on the site than the preferred Millennium Project design was again dismissed. Alternative F would also provide about 2400 more burial sites than the preferred design. That this alternative would require funeral attendees to walk about 200 to 300 feet to the columbaria does not warrant the apparent failure to consider seriously this more historically and environmentally sensitive approach.

The HALRB recognizes Arlington National Cemetery's need to provide additional burial locations for those who have served our country. According to the information presented during the Site Visit and in the Revised EA, the Millennium Project would extend the capacity for burials at Arlington National Cemetery for about 5 to 6 years. In this time, the significant and substantial changes proposed by the preferred design of the Millennium Project will have irreparably altered the historic, cultural, and environmental resources of the site. A substantial portion of the historic Seneca Sandstone Boundary Wall will be a memory, the trees planted to replace those that have existed for the past 145 years will still be immature, and the views from historic Arlington Woods and Arlington House will be very different. Do the very long term significant, potentially adverse, effects of this project on important historic, cultural and environmental resources for a relatively short term benefit justify proceeding on the basis of a questionable finding of no significant impact and without additional study and analysis afforded by a full Environmental Impact Statement? We conclude that they do not.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joan K. Lawrence", with a long horizontal flourish extending to the right.

Joan K Lawrence

Chair, Historical Affairs and Landmark Review Board

cc: Barbara Donnellan, County Manager, Arlington County
Arlington County Board Members
Senator Mark Warner
Senator Tim Kaine
Congressman James Moran

Rob Nieweg, National Trust for Historic Preservation

Katheryn Condon, Executive Director, Army National Cemeteries Program, ANC

From: [Elizabeth Gearin](#)
To: [Conner, Susan L. NAO](#)
Subject: Improve Design of Arlington National Cemetery Expansion
Date: Wednesday, April 03, 2013 1:01:08 PM

Dear Ms. Conner,

I'm contacting you today regarding the proposed expansion of Arlington National Cemetery (ANC). My concerns go beyond the procedural issues - that the current proposal fails to meet the guidelines established by Public Law 107-107, to expand within the contours of the land — and focus on the long-term repercussions. Arlington National Cemetery represents not just a national treasure, but the final resting place for many of our nation's military heroes. Much of its enduring value comes from its preserved pastoral charm in our nation's developed capital. Mature trees and conserved habitat provide a peaceful contemplative opportunity for visiting family as well as tourists. While no one disputes the sad demand to increase the size of the cemetery, changing the current environment of the Cemetery with the addition of multi-story retaining walls and loss of parklike greenery is inappropriate and unjustified for a mere 4-6 years of additional operations. I believe better design can address expansion needs without sacrificing unique habitat.

Sincerely,
Elizabeth Gearin
Arlington VA

This email has been scanned by the Boundary Defense for Email Security System. For more information please visit <http://www.apptix.com/email-security/antispam-virus>



April 11, 2013

Ms. Susan L. Conner
Department of the Army
Norfolk District Corps of Engineers
Fort Norfolk 803 Front Street
Norfolk, VA 23510-1096

RE: revised Environmental Assessment for Historic Arlington House Woods at Arlington National Cemetery

Dear Ms. Conner,

On behalf of our thousands of members in the Washington DC area and the 1,500 Friends of the Potomac in Arlington, I am writing today to express our serious concerns about the current proposal that would completely transform and irreparably harm Arlington House Woods for the Arlington National Cemetery Millennium Project. Potomac Conservancy joins a number of non-profits and Arlington County local government entities in voicing our strong objections to the Preferred Alternative – Alternative E. We believe there are alternatives that will better meet the goal of expanding the cemetery for additional burials without completely altering this historic landscape.

To be clear, we fully support the goal of providing a sacred resting place for those veterans who have honorably served their country. We therefore recognize that additional land must be provided for the expansion of Arlington National Cemetery.

Other groups have already weighed in on the cultural and historical importance of the Arlington House Woods. We want to amplify and expand on the environmental and ecological concerns that have already been raised. The current Proposed Alternative would remove 1,000 trees and dramatically alter the topography of a 27 acre stream valley. Given the magnitude of this proposed project, we do not believe the current Environmental Assessment for the Millennium Project sufficiently considers all the environmental impacts of this project. We therefore request that the Corps complete a full Environmental Impact Statement to ensure the full suite of ecological issues is appropriately addressed.

In the current revised EA, the document rejected Alternative F as a viable option. We are unclear why, and the current EA does not provide sufficient justifications for this decision.

For example, as a part of the EA, the document had to consider compliance with the Chesapeake Bay Preservation Act, which is intended to address the impact land use has on waters that feed into the Chesapeake Bay. Under the current EA, Alternative F does not appear to cross the stream bed or encroach on it. Alternative E clearly would by building a road on top of a previously untouched section of the stream bed. The Preferred Alternative creates more

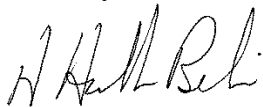
impervious surface than Alternative F. This will result in great amounts of polluted run-off during rains storms. Based on these facts, we are unclear how Alternative F does not meet the standards established by the Chesapeake Bay Preservation Act but the Preferred Alternative does. We would like the Corps to provide additional analysis and justification to provide a clear rational for these conclusions.

In addition, from a functional standpoint, Alternative F provides more burial sites while disturbing less of the historic landscape. In fact, it would appear that Alternative F provides nearly 2,500 more burial sites than Alternative E. We are unclear why Alternative F was eliminated, and the EA does not provide an adequate rational for the decision to reject it.

Potomac Conservancy has worked with federal agencies in the past to modify proposed plans that will allow the agency to accomplish its goal while minimizing the disturbance to existing forested lands and natural areas. The most recent example would be the proposed expansion of the Defense Mapping Agency in Bethesda, MD last year. Collaborating with neighboring homeowner associations, we were able to craft a mutually agreeable alternative, and the public was fully engaged. In the case of the Millennium Project, however, the Corps has not allowed enough time for sufficient public comment and community participation.

We see a clear path forward that will allow the cemetery to increase the number of burial sites while minimizing environmental, historic and cultural disturbances. But that will require the Corps and Arlington National Cemetery to engage authentically and thoughtfully with the surrounding communities and interested parties in the coming months to redesign the Millennium Project. We ask that the Corps and Arlington National Cemetery address the questions and concerns raised above in a subsequent draft of the EA and conduct a full EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Hedrick Belin". The signature is fluid and cursive, with the first name "Hedrick" and last name "Belin" clearly distinguishable.

Hedrick Belin
President

CC: US Senator Mark Warner
US Senator Timothy Kaine
US Representative Jim Moran

From: [Willard945](#)
To: Carlton.Hart@ncpc.gov; [Conner, Susan L. NAO](#)
Subject: Millenium expansion of Arlington Cemetery
Date: Wednesday, April 03, 2013 10:11:48 AM

I am writing to oppose the current expansion plans. This project does not meet the guidelines established by Public Law 107-107, that any expansion be designed within the contours of the land. The current proposal calls for over two-thirds of a mile of retaining walls up to three stories high. In addition, the removal of irreplaceable old-growth trees from a historic area around Arlington House cannot be justified for a few years more of additional burials at Arlington Cemetery. It is time to look for a long-term solution outside the boundaries of this hallowed ground.

Thank you.

Anne Webb

From: [Adrienne](#)
To: [Conner, Susan L. NAO](#)
Subject: Millenium Project
Date: Thursday, March 28, 2013 7:22:34 AM

Dear Ms. Conner,

I urge you to look at the possibility of reducing the number of beautiful trees planned for removal. The trees offer our neighborhood a healthy canopy and deer, fox and other animals depend on the existing ANC woods. Understanding there is national need to provide more burial sites to honor our Veterans, please consider a compromise and eliminate fewer trees. I walk in ANC several times a week and marvel at the peacefulness, especially as I walk the hill near the dense woods (proposed Millenium Project area).

For beauty, human health an animal shelter reasons alone, please adjust he plan and leave at least 30% more trees than planned for removal.

Respectfully,
Adrienne Bacchus
1510 N. 12th Street
Rosslyn, VA 22209

Sent from my iPhone

From: [Brent Spence](#)
To: [Conner, Susan L. NAO](#)
Subject: Millenium Project
Date: Thursday, April 11, 2013 7:54:18 AM

I am extremely concerned about the plan to cut down hundreds of trees at the cemetery. As a disabled Viet Nam War veteran, I feel that this is not a way to honor veterans. If more grave sites are needed put them in another place and call it Arlington Cemetery. If the Pentagon can call Mark Center Ft Belvoir I don't see why you couldn't do something similar.

Brent Spence
brentspence@juno.com
801 S 25th St
Arlington, VA 22202

From: [Dingwell, Suzanne](#)
To: [Conner, Susan L. NAO](#)
Cc: [Manica, Noziglia@warner.senate.gov](mailto:Manica_Noziglia@warner.senate.gov)
Subject: Millenium Project
Date: Friday, April 12, 2013 10:39:03 AM

I would like to add my voice to that group of people who are asking for the Millennium Project to be altered in ways that will protect the intact woods and stream bed at Arlington Cemetery. Enough has already been lost, let that piece of ground stand as an unbroken link to our past, in honor of those who are buried there and for the benefit of those alive today. What would our forefathers think of squandering a resource which was once plentiful, but now in critically short supply?

Of course it is difficult to change plans that are in place, but the Millennium Project was not a good plan 10 years ago. It is a worse one today. The law written by Congress requiring that the site development meet the contours of the land has not been complied with. The insignificant alterations offered recently do not address the underlying problems.

With respect and gratitude for your service,

Sue Dingwell

418 Ferdinand Day Drive
Alexandria, VA 22304
561 818-9654



April 12, 2013

Susan Conner
U.S. Army Corps of Engineers
Norfolk District
susan.l.conner@usace.army.mil

RE: Millennium Project Revised Environmental Assessment

I want to thank you for the opportunity to provide feedback on the revised draft Environmental Assessment for the proposed Arlington National Cemetery Millennium Project. Arlington National Cemetery and Arlington House are extremely important parts of Arlington history and the story of our community. They are also an important part of our future and our continued economic success as a historic tourist destination in the Commonwealth of Virginia.

The **Arlington Heritage Alliance** is an advocacy organization on historic issues in Arlington County, Virginia. Our members have been involved in this issue including reviewing the revised Environmental Assessment and participating in the Open House and tour of the site in the middle of March 2013.

The Arlington House Woods stands to sustain permanent damage, from the Millennium Project, as currently proposed. One of our community's very valuable assets and certainly a one-of-a-kind historic treasure, Arlington House Woods and Arlington House deserve an exceptional level of thought, scrutiny and protection. The Arlington House Woods are part of the interpretation of Arlington House, one of our Nation's easily recognized landmarks.

Direct Destruction of Arlington House Woods. The Environmental Assessment is inaccurate and fails to recognize that almost half of the Millennium Project site area (12 of the 27 acres) is listed on the National Register of Historic Places. It has been on the National Register since 1966. This area is on the National Register because it is an important part of the immediate environment of Arlington House and an important part of historic interpretation of this site. To destroy portions of Arlington House Woods, an area that has been granted special recognition for its part in the history of our Country, is not comprehensible.

Viewshed Destruction. For those parts of Arlington House Woods not slated for destruction, there will be irreparable damage to the viewshed and subsequently the understanding of Arlington House and its setting. It

is almost impossible to understand how the Environmental Assessments asserts that there will be no visual impact on the viewsheds of Arlington House Woods and Arlington House, TWO National Register for Historic Places properties.

The Draft Environmental Assessment report needs to be corrected so that it is accurate to the facts of the situation. This includes stating that: portions of the Millennium Project are in fact proposed to take portions of the National Register for Historic Places listed Arlington Woods; that the Arlington Woods and Arlington House are both National Register listed properties which will be directly and indirectly impacted; and, graphics be included to show views of Arlington House in full Summer tree canopy and a proposed "after" showing how the tree canopy would be altered.

Site Design and Destruction. The majority of the site proposed for the Millennium project has been preserved over the years by two key factors. First, in 1964 the Secretary of Defense ordered that this area be preserved in perpetuity. And, second, the site topography of slopes, ravines and natural waterways, make it very difficult to utilize in any manner other than its natural state. The proposed Millennium project has not and cannot "meet the contours" of this historic site, as is required by Act of Congress. To be implemented the Millennium project will need to regrade substantial portions of the site, with over 100,000 cubic yards of soil being moved to accommodate efficient burial areas, and this will completely alter the topography of this natural site. In one place the proposed project calls for a 20 foot high retaining wall. The Environmental Assessment has failed to accurately review the dramatic impact this project will have on the natural contours and conditions of this site. And these natural landscape components are an important part of the historical interpretation of Arlington House and Arlington Woods. When the various lands were transferred at Arlington House it was with the understanding that any development of the land would be keeping within the character of the property and in such also its designation as a National Register property.

We are uncertain about the rush for implementation of the Millennium Project. Capacity at Arlington Cemetery is high but recent expansions and other opportunities for growth have met the expected demand for at least the next decade. However, at some point the Cemetery will be at capacity. And at that time other options and other sites will be the only choice. In the meantime, we will have lost the historic context of Arlington House and Arlington Woods. Tourists and historians will have a greatly diminished interpretation of what it may have been like at Arlington House and Arlington House Woods.

We respectfully request that the EA be corrected to properly state the issues with the National Register for Historic Places and that the design undergo a substantial review to determine how it could better meet the site constraints of this site that is important to the history of Arlington County, the Commonwealth of Virginia and the United States. It is an important place that deserves extra thorough and accurate review.

Thank you.

Arlington Heritage Alliance
P.O. Box 1418, Arlington, VA 22210

From: [J.R. Roberts](#)
To: [Conner, Susan L. NAO](#)
Subject: Millennium Environmental Assessment
Date: Thursday, April 04, 2013 10:05:37 PM

Hi Susan -

I am interested in reading the Environmental Assessment for the Millennium project at Arlington National Cemetery, however the link to the document no longer exists on the website. Can you send me a copy of the assessment?

Thank you,

James Roberts

From: [Donna Murphy](#)
To: [Conner, Susan L. NAO](#)
Subject: Millennium Expansion of Arlington National Cemetery
Date: Friday, April 05, 2013 6:01:17 PM

Dear Ms. Conner

I am a resident of Fairfax County, Virginia, and I'm worried about the proposed Millennium expansion of Arlington National Cemetery and the impact it will have on Arlington House Woods, one of the last remnants of old-age forest in our region with a high degree of ecological, historical and cultural significance. Arlington House Woods is a Virginia Native Plant Society Registry site and it is listed on the National Register of Historic Places. As currently proposed, the project does not meet the guidelines established by Public Law 107-107, that the cemetery expansion be designed within the contours of the land. The current proposal calls for over two-thirds of a mile of retaining walls up to three stories high. I am opposed to the project as currently proposed.

The extremely high environmental, historical and economic cost of destroying irreplaceable resources for a mere 4-6 years of additional operations is not justified. The time for a long-term solution and not just a redesign of the proposed plan is now.

However, I understand that the current proposal could be redesigned in such a way to greatly reduce destruction of the forest, and at the very least this would be a better course of action.

Sincerely,

Donna A. Murphy
3257 Willow Glen Drive
Herndon, VA 20171
703-860-0999

From: [lucy spencer](#)
To: [Conner, Susan L. NAO](#)
Subject: millennium project
Date: Wednesday, April 10, 2013 9:36:59 PM

Dear Ms. Conner:

If 23 more trees are to be cut, where is that? Why more trees and what else environmental adverse is planned.

Since the new millennium project has space for only 6 more years of burials, the new trees which you will plant will still be so small that the entire project will look a bit like a shopping mall when a few trees are intended to make people feel that the builder cared about the land and our air, which 30% of the planet's oxygen comes from tree, the 79% remaining comes from the oceans.

I want to know what plan the NC has for burials after six years. Surely, this is discussed and a plan is made. Why not share with the public, what those plans are.

I weep for the families who will bury in such a cold, unfriendly artificial and man-made project instead of the rolling hills with large trees in the old cemetery. War is terrible and to die in battle from man made guns and then be buried in another man-made environment will be so hard.

Please explain the new plan which is not what was presented to the public in March.

Sincerely yours,

Lucy Norman Spencer



**National Trust *for*
Historic Preservation**

Save the past. Enrich the future.

April 12, 2013

VIA EMAIL

Ms. Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

**Re: Revised Draft Environmental Assessment for the Proposed Millennium Project at
Arlington National Cemetery (March 2013)**

Dear Ms. Conner:

Thank you for the opportunity to comment on the revised draft Environmental Assessment for the proposed Millennium Project at Arlington National Cemetery, which the National Trust for Historic Preservation, a consulting party, received on March 12, 2013. The National Trust has reviewed the revised Environmental Assessment and participated in the March 16, 2013, public tour of the project site convened by the Army Corps. Unfortunately, we remain seriously concerned that the proposed Millennium Project, as designed, would unnecessarily harm a unique and irreplaceable historic resource – Arlington House Woods.

**1. The proposed Millennium Project would be constructed within historic
Arlington House Woods, a publicly owned historic property which is
listed on the National Register of Historic Places.**

It is apparent to the National Trust and other consulting parties that the proposed Millennium Project would be constructed within a rare surviving section of Arlington House Woods, an historic property which merits careful preservation. However, the interested public may be confused on this critical point because the revised draft Environmental Assessment minimizes the historical significance of the Millennium Project site.

The Millennium Project is planned for a 27-acre site consisting, in part, of former Section 29 of Arlington Cemetery. [Revised EA, p. 16.] According to the Army Corps, former Section 29 is “NPS property [which was] returned to ANC consisting of a section of the Arlington Woods associated with Arlington House[.]” [Revised EA, p. 75.] The proposed Millennium Site includes a section of Arlington House Woods, and this landscape has long been valued as historic. “In May 1964, the Secretary of Defense ordered that the hardwood forest west of Arlington House, containing 24.436 acres, be preserved in perpetuity, the land maintained in a park-like manner to provide an appropriate setting for the mansion.” [Arlington House Cultural Landscape Report, 2001, p. 163.]

Washington Field Office

1785 Massachusetts Avenue NW Washington, DC 20036

E rnieweg@savingplaces.org P 202.588.6107 www.PreservationNation.org

In 1966 all of the Park Service property at Arlington House, including Section 29, was placed on the National Register of Historic Places. "The National Register boundary encompasses all land adjacent to Arlington House under National Park Service jurisdiction." [Arlington House Nomination to National Register of Historic Places, 1980, p. 4 (The 1980 nomination documented the 1966 National Register listing).] Twelve acres of this National Register-listed property were transferred by Congress to Arlington National Cemetery in 2001. The National Register nomination was not subsequently amended and, therefore, the twelve acres of public property transferred from the Park Service to Arlington Cemetery is listed on the National Register of Historic Places -- our country's list of historic resources which merit preservation.

Unfortunately, the revised draft Environmental Assessment does not acknowledge that twelve acres of the 27-acre Millennium Project site are listed on the National Register of Historic Places and are considered worthy of preservation. For example, the revised Environmental Assessment states: "NRHP eligible historic district contributing landscape elements are within the physical APE [of the Millennium Project.]" [Revised EA, p. 123 (emphasis added).] In fact, a National Register-listed landscape is within the physical Area of Potential Effects. The revised Environmental Assessment also states: "The proposed action would result in direct physical adverse effects to NRHP eligible historic district landscape components." [Revised EA, p. 127 (emphasis added).] In fact, the proposed Millennium Project also would result in direct physical harm to National Register-listed historic district landscape components, including topography, trees, and the boundary wall.

The Millennium Project site consists of a surviving section of Arlington House Woods which has long been recognized and preserved for its essential historic association with Arlington House. This fact should be clear to planners and the public.

Regrettably, the proponents of the Millennium Project -- Arlington National Cemetery and the Army Corps -- have informed the interested public, first, that the proposed Millennium Project site is separate and distinct from Arlington House Woods and, second, that the Millennium Project would not harm Arlington House Woods. For example, Arlington National Cemetery wrote the National Trust that "Arlington Woods ... belongs to the National Park Service and is adjacent to the Millennium Project footprint. ... The project has only minor effects, primarily beneficial, to the Arlington Woods area[.]" [Kathryn A. Condon, ANC, to John Hildreth, NTHP, March 11, 2013.] The revised draft Environmental Assessment repeats the same error, telling the interested public that the forested area "commonly known as 'Arlington Woods,' is adjacent to the Millennium Project." [Revised EA, p. 3 and 112 (emphasis added).] The revised Environmental Assessment continues:

As noted previously, no native trees would be removed from the 235-year old stand of trees on NPS property. This forested area, included on the Virginia Native Plant Society Registry and commonly known as "Arlington Woods," is adjacent to the Millennium Project. The only activities on NPS property would include a very small area along the stream restoration and a small portion of the MRSC system. [Revised EA, p. 112.]

From these inaccurate statements in the revised draft Environmental Assessment the interested public may conclude, mistakenly, that all of Arlington Woods is administered by the National Park Service and that no part of Arlington Woods is administered by Arlington National Cemetery. The revised Environmental Assessment also may create the mistaken impression that the proposed Millennium Project would not directly impact historic Arlington Woods.

Furthermore, the March 2013 revised Environmental Assessment asserts incorrectly that the proposed Millennium Project would have no adverse visual impacts on the surviving portion of Arlington House Woods which is under the jurisdiction of the National Park Service. The revised Environmental Assessment states incorrectly: "A visual effects study was conducted for the viewshed of the proposed action[.] ... Implementation of the proposed Millennium Project would have no effect on the historic setting of NRHP listed Arlington House." [Revised EA, p. 125 (emphasis added).] Appendix B to the revised Environmental Assessment also states: "Arlington House, [will suffer] no adverse effects, the retention of a woodland buffer not affect the historic character of the Arlington House setting, the Millennium project will not be visible from Arlington House." [Revised EA, Appendix B, Cultural Resource Information, "Summary of Information and Consultations for National Historic Preservation Act Section 106 Compliance, ANC Millennium Project, 2012."]

Based upon the revised Environmental Assessment the interested public may mistakenly conclude that the Army Corps has assessed potential visual impacts to the historic setting of Arlington House and the Army Corps has determined, based on its assessment, that there would be no adverse visual impacts to Arlington House Woods.

However, as the National Trust's March 15, 2013, comment letter observed, the Army Corps did not assess the potential visual impacts to the surviving portion of Arlington House Woods, the historic setting of Arlington House, which is under the jurisdiction of the National Park Service. The Army Corps transmittal letter for the February 28, 2013 visual effect study states unequivocally: "Visual effects to the adjacent Arlington Woods was not considered in this study as the present condition of adjacent areas neither contributes nor detracts from its setting." [U.S. Army Corps of Engineers to Virginia Department of Historic Resources, Mar. 8, 2013 (emphasis added).] In short, the Army Corps did not assess visual effects to the historic setting of Arlington House, and the February 2013 visual effects study does not support the March 2013 finding of no effect in the revised draft Environmental Assessment. Nevertheless, the interested public may mistakenly conclude, based upon the revised draft Environmental Assessment, that the Millennium Project would have no visual effect on Arlington Woods, the historic setting of Arlington House.

After careful review of the revised draft Environmental Assessment, the National Trust respectfully recommends that:

- (a) The draft Environmental Assessment should be revised to clearly acknowledge that the proposed Millennium Project would be constructed within, and would directly impact, Arlington Woods, the historic setting of Arlington House.

- (b) The draft Environmental Assessment should be corrected to expressly state that a 12-acre portion of the 27-acre Millennium Project site is officially listed, and is not merely eligible for listing, on the National Register of Historic Places.
- (c) The draft Environmental Assessment should be revised to delete the unsubstantiated finding that the proposed Millennium Project would have no visual effects on the historic setting of National Register-listed Arlington House.
- (d) The draft Environmental Assessment should be revised, in the interest of transparency, to inform the public that the Millennium Project would be plainly visible from Arlington House Woods, the historic setting of Arlington House.

2. As planned, the Millennium Project would require “significant earthwork” and a “large quantity of cut and fill,” because the proposed project has not been “designed to meet the contours” of its historic site.

The site of the proposed Millennium Project is a natural, cultural and historic landscape which is “characterized by steep slopes, wooded hilltops, and ravines.” [Revised EA, p. 58.] When Congress transferred twelve acres of Arlington House Woods to Arlington National Cemetery for expansion of burial area, Congress also mandated that the Millennium Project must be “designed to meet the contours” of its historic site. Public Law 107-107 expressly requires:

The Secretary of the Army shall use the transferred property for the development of in-ground burial sites and columbarium that are designed to meet the contours of Section 29. [Public Law 107-107, Section 2863(h), Dec. 28, 2001 (emphasis added).]

Given past efforts by the Federal government to protect historic Arlington Woods in perpetuity, it is reasonable to presume that Congress, by mandating that the project “meet the contours” of the existing landscape, intended to require that the Millennium Project must conform with precision to the existing form of the topography of Section 29 with the least change to the landscape. That is, the Millennium Project must fit into the existing shape of the historic landscape.

The revised draft Environmental Assessment informs the public that “Public Law 107-107 dated Dec 28 2001 directs the Secretary of the Army to develop the area for in-ground burial sites and columbarium.” [Revised EA, p. 18.] However, the revised Environmental Assessment does not acknowledge that the Millennium Project is required by law to “meet the contours” of its historic site. This is a critical omission.

It is evident that the Millennium Project, as planned, would not fit into the existing contours of the landscape. Instead, the Millennium Project design requires “significant earthwork” and “a large quantity of cut and fill[.]” [Revised EA, p. 95.] As planned, the Millennium Project requires “the re-grading of the existing steep slope and valley topography of the site through cut and fill operations to achieve an appropriate landscape suitable for public access and burials.” [Revised EA, p. 97.] According to the Sierra Club, the Millennium Project would “completely alter the topography of a natural, steep-sloped stream valley[.]” [Sierra Club to Army Corps of Engineers, Jan. 15, 2013 (emphasis

added).] Importantly, according to Arlington County's Historic Preservation Office, the Army Corps of Engineers' preferred alternative would result in the "near complete loss of the historical landscape in the stream valley and on the east side of the stream bank." [Arlington County Historic Preservation Office to Army Corps of Engineer, January 17, 2013 (emphasis added).] In the National Trust's view, the current plan for the Millennium Project has not been designed to meet the contours of Section 29 and, therefore, the proposed project does not satisfy a key condition placed on the use of the transferred land by Congress.

To satisfy the requirements of Section 106 of the National Historic Preservation Act, the Environmental Assessment should address impacts to the topography of the Millennium Project's historic site. According to the Virginia Department of Historic Resources, in order to properly assess the Millennium Project's potential effects on the cultural landscape, the draft Environmental Assessment must be expanded to consider and address impacts to the site's topography. The removal of hundreds of healthy, native trees is "only one aspect of the landscape that must be considered and addressed," according to the Department of Historic Resources. The Department of Historic Resources states:

The natural landscape that will be impacted also consists of other features such as gullies, ravines, ridges, etc. The EA document should also evaluate the removal of these topographical features when discussing the effects to the historic landscape. [Marc Holma, Virginia Department of Historic Resources, to Susan Conner, Army Corps of Engineers, April 1, 2013 (emphasis added).]

Therefore, the National Trust respectfully recommends that:

- (a) The design for the proposed Millennium Project should be substantially modified to meet the contours of Section 29, and to eliminate the need for significant earthwork and large cut and fill.
- (b) The draft Environmental Assessment should be revised to inform the public that Public Law 107-107 mandates that the Millennium Project must be "designed to meet the contours of Section 29."
- (c) The draft Environmental Assessment should be expanded to consider and address the impacts to the topography caused by the Millennium Project plan, as designed, including the removal of the historic site's gullies, ravines, and ridges.

3. Conclusion.

Arlington National Cemetery is required by federal law to seek ways to avoid, minimize, or mitigate potential adverse impacts to historic resources which may be caused by the Millennium Project, commencing at the early stages of the project planning to consider a broad range of alternatives.

We understand that the design for the Millennium Project is 95-percent completed, and the revised draft Environmental Assessment indicates that "Section 106 mitigation of adverse effects through project design has been a continuing objective of Millennium

Project planners.” [Revised EA, p. 127.] The draft document explains: “Adverse effects to the ANC historic district landscape were identified. These were to the Boundary Wall in Section 29, and forest in Section 29. Mitigation measures to resolve the adverse effects have been incorporated into the proposed project design[.]” [Revised EA, Appendix B, Cultural Resource Information.] However, according to the revised Environmental Assessment, these mitigation measures are limited to: planting new trees and shrubs [Revised EA, p. 127]; reusing some historic stone from the boundary wall [Revised EA, p. 128]; and, three public involvement projects [Revised EA, Appendix B, Cultural Resource Information.]. In the National Trust’s view, the proposed mitigation measures are not proportionate to the significance of the historic resource or to the severity of the potential impacts from the Millennium Project.

Nevertheless, the revised draft Environmental Assessment states: “Section 106 consultation is ongoing among ANC, VDHR, USACE, Arlington County, CFA, NCPC, JBMHH, NTHP and NPS. A memorandum of agreement has been proposed for the implementation of measures to mitigate any determined adverse effects, as defined in Section 106. [Revised EA, p. 22 and 128.]” A memorandum of agreement has been proposed by the Army Corps. The revised Environmental Assessment, however, implies that the National Park Service supports the limited mitigation measures and has had a role in proposing a memorandum of agreement. (The National Trust has not proposed an MOA.) The National Park Service is the longtime steward of Arlington House and is a “Cooperating Agency” for the Millennium Project. The National Trust respectfully requests additional clarifying information to understand the National Park Service’s involvement, if any, in developing project mitigation measures and in proposing the MOA referenced in the revised draft Environmental Assessment.

Thank you in advance for considering the views and recommendations of the National Trust for Historic Preservation.

Sincerely,



Robert Nieweg
Field Director & Attorney
Washington Field Office
National Trust for Historic Preservation

cc: U.S. Senator Mark Warner
U.S. Senator Timothy Kaine
Advisory Committee on Arlington National Cemetery
Kathryn A. Condon, Army National Cemeteries Program

From: [Rebekah Paulson](#)
To: [Conner, Susan L. NAO](#)
Cc: [Ahern, Stephanie R LTC USARMY HQDA ANC OSA \(US\); amanda_chuzi@kaine.senate.gov; "Congressman Jim Cooper"](#)
Subject: Objections to ANC Millennium Project
Date: Thursday, April 04, 2013 7:28:44 PM

Dear Ms. Conner,

I am writing to express my objections to the ANC Millennium Project as it is currently designed and my support for a complete EIS. Many other options exist to greatly minimize the environmental damage that the current project will create. It is still possible to make these design changes and allow both cemetery expansion and the preservation of the old forest. These changes very likely will cost the tax payers less money as well, and save the 165 year forest.

I want you to express again to you that I have extremely personal connections and concern for Arlington National Cemetery. My parents, John and Rosalie Paulson, and two siblings are buried in section 38 of the cemetery. The area where they lie to rest is very close to the proposed devastation of the old forest, the elimination of nearly 900 trees, construction that will ultimately kill many more trees on the forest edge including the old-growth section of the woods that must be protected. Additionally I am opposed to the terribly unwise and environmental damaging plan to develop in the steep ravine that has been "off limits" for 150 years.

The Army Corps of Engineers can and should change the design which is at 65% right now. This needed change respects America's sons and daughters who have sacrificed and served their country as well as the living forest and the nearby neighborhoods that are already suffering from overdevelopment and the felling of many old trees and forest land.

It seems that the revised EA is not a serious attempt to thoroughly determine the environmental impacts of the project. If the EIS was completed during the spring and summer timeframes there would be many more species of plants, animals and wildlife of all types. I urge you to conduct the EIS and redesign the project to protect the forest and avoid the steep ravine. Please reconsider your current plans and the following points:

- * The Arlington National Cemetery (ANC) Millennium expansion project does not need to be either an expansion of the cemetery or preservation of old age forest with high historical and ecological value – with a better design it can be both.

- * Public Law 107-107, Section 2863 (h) (2), which transferred the portion of Section 29 from the Department of Interior to the Department of Defense for purposes of expanding the operations of the cemetery specifically states: "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." (italics added).

- * The law very clearly calls for a design of the expansion project within the contours of the land, and the Millennium project as it is currently proposed in the revised EA issued on March 12, 2013 does not meet this requirement and needs to be redesigned.

I wrote the following and hope it will persuade you to conduct a complete EIS (rather than the current revised EA) and a redesign of this project to save the old forest and the ancient trees as well as properly protect the old-growth forest.

Arlington National Cemetery (ANC) is a national treasure and shrine. (by Rebekah Paulson)

Arlington National Cemetery's Vision statement reads "America's premier military cemetery - A national shrine - A living history of freedom - Where dignity and honor rest in solemn repose." The current cemetery expansion proposal -- The Millennium Project-- seems to be a blueprint of contradiction to their stated vision. The revised EA for The Millennium Project states "that the project will remove from a woodland 732 healthy native trees with a maximum age of 145 years. The majority of the trees are less than 105 years." However, some trees may actually be much older, as they have regrown from the stumps of older trees.

While most of the land within the boundaries of ANC embraces our war heroes, a small fraction of that land supports an incredible variety of living giants and they in turn support many animals. Migrating and resident birds find refuge, food and water here. Eagles soar overhead, owls, hawks, woodpeckers, foxes, and countless other species raise their young here.

The Millennium Project would kick start the systematic destruction of the last old growth forest in Northern Virginia. These trees are the remains of an old-growth forest ecosystem which provide significant environmental benefits to the surrounding communities and the cemetery itself. There is nothing on earth better than old growth forests to produce oxygen, clean water, sequester Co2, prevent erosion and influence climate. Intact old growth forest in the eastern United States is currently at .06 percent.

If this project goes forward the entire forest is at risk and becomes vulnerable to storm damage and pollution and further incursion for more and more burial plots. Removing the forest piece by piece will destroy the habitat essential to life and will forever destroy the living history of Arlington Cemetery

Congressman Jim Cooper, in a commentary to the Washington Post dated Aug 13, 2011, stated the "Millennium Project, (is) a pompous name for a small sloping field and large wooded ravine at the western edge of the cemetery.... Another concern is the old-growth forest in the steep ravine that borders the cemetery. The Millennium ravine was deemed unfit for burials for 150 years; no amount of engineering will change that." Congressman Cooper continues "Arlington Cemetery cannot keep growing forever." He correctly advises that the solution instead is to build a new national cemetery. So the question is, does it close before you destroy this ecological treasure in Arlington, VA or after?

While ANC feels the pressure to expand into the forest, there is a limitation on expansion despite the never ending need for burial and columbarium space. The cemetery is graced with beauty and peacefulness that is enhanced by the majestic old trees and will be diminished without them. Removing the forest to expand Arlington National Cemetery is an unacceptable solution to a solvable problem.

The ANC administration, the U.S. Army and the U.S. Army Corp of Engineers must cancel their plan to remove any of these trees and instead take immediate steps to permanently protect the old-growth forest from any and all threats natural and man-made. The federal government and the military need to find an appropriate place to build a new cemetery for our current, and future, heroes and dignitaries. There are countless other admirable ways to honor departed souls. It is unconscionable to kill the living ancients to create space to bury the dead when another national cemetery can, and should be, created elsewhere.

Sincerely, Rebekah Paulson

Rebekah Paulson, Executive Director

Friends of Stadium Woods

www.savestadiumwoods.com <<http://www.savestadiumwoods.com/>>

P.O. Box 11207, Blacksburg, VA 24062

540.250.6905

rebekah.paulson@comcast.net <<mailto:rebekah.paulson@comcast.net>>

"Conservation is a cause that has no end. There is no point at which we say, 'Our work is finished.'" —
Rachel Carson

From: [Beverly Fleming](#)
To: [Conner, Susan L. NAO](#)
Subject: Old forest
Date: Monday, March 18, 2013 8:15:12 PM

Please use the newly acquired 37 acres for Arlington National Cemetery rather than cut down the old growth forest. Please allow it to grow and thrive so that all the Nation might enjoy it as long as possible.

Beverly Fleming
603 Floyd St.
Blacksburg, VA 24060

From: [Susan N Dubose](#)
To: [Conner, Susan L. NAO](#)
Subject: Old growth tree cutting in Arlington National Cemetery
Date: Saturday, April 06, 2013 5:06:41 PM

Please do not permit the cutting and chopping down of approximately 900 old growth trees, mature trees and some of the surrounding forest ecosystem in Arlington National Cemetery. This would, among other things, put the area at risk for water quality problems. In addition, the trees are one of the major reasons many of our heroes have opted to be buried at ANC, as well as the preference of the families and loved ones. The trees give the cemetery uncommon beauty and tranquility.

Thank you for your reconsideration on behalf of concerned citizens, as well as the families and loved ones of our heroes.

Susan N. DuBose

(804) 360-4152

sndubose@comcast.net

From: [James Richardson](#)
To: [Conner, Susan L. NAO](#)
Subject: Old Growth Trees on Arlington Cemetery Grounds
Date: Saturday, March 16, 2013 12:54:30 PM

Ms Conner,

I would like to support all efforts to save the old growth trees in question. I live near Arlington Cemetery, but I would be horrified at the prospect of their loss regardless of where I lived. Not only are they important to our environment and to the looks and feel of Arlington Cemetery, but they are a sign of respect for our brave dead buried around and beneath them. Their removal is too much to sacrifice for a 4 to 8 year solution. The Marine Annex is surely a better approach.

Thank you for your consideration.

James J. Richardson

From: [Pete](#)
To: [Conner, Susan L. NAO](#)
Subject: Old oak forest removal
Date: Wednesday, March 20, 2013 8:52:13 PM

Dear Ms. Conner:

I walk in the cemetery regularly and would hate to see what is left of the old forest taken down. You guys are getting the Navy Annex and all the land leading up to it. You really don't need to take this down. I understand that if you redesigned the area with removal of a loop road, you could keep most of the forest intact. Please do that. Build a columbarium that is twice as big on the Navy Annex land to compensate.

My grand parents are all buried at the cemetery and I visit them regularly. Part of the beauty of the place is the natural surroundings. Please don't remove the last part of the old forest. It's a real asset to the place.

My grandfather, a retired Master Sargent, was well known at Ft. Meyer, and he used to drive us around the cemetery to visit the monuments. He's buried near the Maine memorial with my grandmother. My other grandparents are buried near the the McClellan gate. I live on 6th St, in my grandparent's house, a 20 minute walk to the entrance by the old chapel. I try to walk there every weekend. It's such a beautiful place. Please keep the natural beauty intact.

Maria Durgan
2000 6th St. S., Arlington VA 22204

From: [Rebekah Paulson](#)
To: arlingtoncemetery.isb@mail.mil; [Conner, Susan L. NAO](#); [Haynes, John H. NAO](#)
Cc: loribrown91@verizon.net; ["Melanie Jackson"](#); [Darryl D Fears](#); [Royce, Lindy](#); [Joan Maloof](#)
Subject: Opposition to Proposed Expansion of Arlington National Cemetery
Date: Tuesday, February 26, 2013 5:22:53 PM

Dear Ms. Condon, Ms. Conner and Mr. Haynes,

I am writing to express my opposition to the proposed expansion of Arlington National Cemetery and the development of the area of old-growth forest currently being considered for this expansion. I have attempted to call the Secretary of the U.S. Army, The Honorable John McHugh, and obtain his email address.

Today I have also called the offices of Senator Mark Warner, Senator Tim Kaine and Congressman Jim Moran to express my opposition to the same.

Arlington National Cemetery is a national treasure. The cemetery and Arlington House have significant national historical importance. The remaining old-growth forest is an ecological treasure as well. On the east coast there remains only .06% of old-growth forest and all remaining old-growth must be preserved regardless of its size or location. The remaining forested land at ANC also provides significant environmental ecosystem services to the surrounding communities and the cemetery itself. I strongly request that the ancient trees and old-growth forest at ANC remain undeveloped.

My father, John Willis Paulson, my mother Rosalie Marie Kennedy Paulson, and my infant siblings Jennifer Lynn Paulson and Jonathan Wayne Paulson, are buried in Arlington National Cemetery in section 38. This area of the cemetery is graced with beauty and peacefulness that is enhanced by the ancient trees. My parents and my sisters, Lori Brown and Melanie Jackson, lived on the Fort Myer Military Base. I lived in Arlington County near Fort Myer and the cemetery for 18 years. My family has significant ties to both Arlington National Cemetery and the U.S. Army.

I understand the perceived need to expand the cemetery however there is a limitation on expansion regardless of the endless necessity for burial or columbarium space. Congressman Jim Cooper, in a commentary to the Washington Post dated Aug 13, 2011, stated the "Millennium Project, a pompous name for a small sloping field and large wooded ravine at the western edge of the cemetery. This property lies below Fort Myer, the base of operations for the Army's Old Guard and several four-star generals." He continues "Storm water runoff from Fort Myer is so bad that the Corps has already installed a million-gallon underground storage tank to minimize the erosion of graves. Another concern is the old-growth forest in the steep ravine that borders the cemetery." The Congressman notes that developing this area will add perhaps 4-8 years expansion for new burial sites.

Congressman Cooper continues regardless of any expansion "Arlington Cemetery cannot keep growing forever." He suggests instead building a new national cemetery. I echo his recommendation. If the ANC lacks space then close it to new burials.

I am closely watching this issue and pray that the military will find an appropriate place to build a new cemetery for our current, and future, heroes and dignitaries. Removing old-growth forest to expand ANC

is unacceptable. I truly believe that it is unconscionable to kill the living ancients to create space to bury the dead.

Sincerely,

Rebekah Rose Paulson

Rebekah Paulson, Executive Director

Friends of Stadium Woods

www.savestadiumwoods.com <<http://www.savestadiumwoods.com/>>

P.O. Box 11207, Blacksburg, VA 24062

540.250.6905

rebekah.paulson@comcast.net <<mailto:rebekah.paulson@comcast.net>>

"Never doubt that a small group of thoughtful, committed, citizens can change the world. Indeed, it is the only thing that ever has." — Margaret Mead

<http://www.goodreads.com/author/show/61107.Margaret_Mead>

From: [Mary Nell Bryant](#)
To: [Conner, Susan L. NAO](#)
Subject: Please don't destroy the trees...just not necessary!
Date: Wednesday, April 03, 2013 8:45:02 AM

Dear Ms. Conner:

I am writing in regarding the proposed Millennium expansion of Arlington National Cemetery.

As currently proposed, the project does not meet the guidelines established by Public Law 107-107, that the cemetery expansion be designed within the contours of the land. The current proposal calls for over two-thirds of a mile of retaining walls up to three-stories high.

I am strongly opposed to the project as currently proposed. The project needs to be and can be redesigned. The extremely high environmental, historical and economic cost of destroying irreplaceable resources for a mere 4-6 years of additional operations is not justified and a long term solution must be found.

Thank you for your work, and I hope you will consider my position.

Mary Nell Bryant

Arlington, VA

From: [Rachel Johnson](#)
To: [Conner, Susan L. NAO](#)
Cc: bethg@ripnet.ca
Subject: Preserving Old Growth Trees/Arlington Nat'l Cemetery
Date: Friday, March 15, 2013 3:47:04 PM

Dear Ms. Conner,

We are totally opposed to the expansion of Arlington Cemetery into the wooded area, because old-growth trees will be destroyed. There are adjacent areas that may be used where the land is flatter, already disturbed, and without the huge trees.

PLEASE do not cut the old growth trees.

My grandfather, a Congressman, is buried there and he would dislike any damage to trees that had grown there since long before his birth.

Rachel B. Johnson, granddaughter of the Hon. Royal Cleaves Johnson

From: [Jennifer Frum](#)
To: [Conner, Susan L. NAO](#)
Subject: proposed loss of trees at the Cemetery
Date: Saturday, March 16, 2013 6:44:42 PM

Dear Susan Conner -
please reconsider these plans. It is tragic to cut down this whole section of forest. I know you would like more space for burials, but the space is finite anyway. what would you do when this space runs out? Why not go to that system now - if it is more cremations, changing spacing, burying in between the existing rows. There must be a long-term plan. Arlington's living residents can't bear the loss of any more trees.

Thank you,
Jennifer Frum
2350 S. Nash St
Arlington, VA 22202

From: [Kasha Helget](#)
To: [Conner, Susan L. NAO](#)
Subject: Proposed Millennium expansion of Arlington National Cemetery
Date: Wednesday, April 03, 2013 12:12:26 PM

Dear Ms. Conner –

I understand that you are the contact at the Army Corps of Engineers that is overseeing the proposed Millennium expansion of Arlington National Cemetery.

As currently proposed, the project does not meet the guidelines established by Public Law 107-107, that the cemetery expansion be designed within the contours of the land. The current proposal calls for over two-thirds of a mile of retaining walls up to three-stories high.

I am strongly opposed to the project as currently proposed. The project needs to be and can be redesigned. The extremely high environmental, historical, and economic cost of destroying irreplaceable resources for a mere 4-6 years of additional operations is not justified and a long-term solution can be found.

Please do everything you can to protect this unique and important resource.

Thank you for your consideration.

-- Kasha Helget, Alexandria, VA

703-820-8859

From: [Evans, Gregory \(DOF\)](#)
To: [Ellis, Charles \(DEQ\)](#)
Cc: [Conner, Susan L. NAO](#); [Irons, Ellie \(DEQ\)](#); [Kline, Everett \(DOF\)](#)
Subject: RE: Arlington National Cemetery - Millennium Project Comments (UNCLASSIFIED)
Date: Monday, March 04, 2013 9:29:14 AM

Ms. Conner:

Thank you for your note and clarification. I understand the site challenges you face and appreciate USACE's diligence in coordinating with Virginia's state agencies to meet the 100 foot setback objective to the maximum extent practicable.

Good luck on the project. I was in Arlington at the cemetery two weeks ago and noticed that demolition of some of the nearby old Ft. Meyer buildings has already begun. Will the Millennium Project incorporate some of that area?

Greg

Greg Evans
Voluntary Mitigation Program Manager
Virginia Department of Forestry
900 Natural Resources Drive, Suite 800
Charlottesville, VA 229035
434-220-9020
gregory.evans@dof.virginia.gov
www.dof.virginia.gov

-----Original Message-----

From: Ellis, Charles (DEQ)
Sent: Sunday, March 03, 2013 6:19 PM
To: Evans, Gregory (DOF)
Cc: Conner, Susan L. NAO; Irons, Ellie (DEQ)
Subject: FW: Arlington National Cemetery - Millennium Project Comments (UNCLASSIFIED)

Greg -- Susan Conner at the Corps of Engineers asked me to forward this note to you concerning our review of the Corps's Millennium Project (expansion) at Arlington Cemetery (our DEQ log numbers 12-203F and 12-225F). We reviewed the EA and Federal Consistency Determination in November and December.

Charlie

-----Original Message-----

From: Conner, Susan L. NAO [<mailto:Susan.L.Conner@usace.army.mil>]
Sent: Friday, March 01, 2013 12:59 AM
To: Ellis, Charles (DEQ)
Subject: Arlington National Cemetery - Millennium Project Comments (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Charlie, can you pass this email along to Gregory Evans at VDOF? I do not see his email address anywhere in the comments I received from the Commonwealth.

Mr. Evans-

Thank you so much for your review of the ANC Millennium Project (comments attached). I did have one slight concern that I wanted to clarify.

The statement in the last sentence, "The buffer areas would be maintained with 100-foot setbacks to comply with Chesapeake Bay Preservation Act criteria". We have coordinated with both DCR and DEQ on this project and will continue to do so throughout the detailed design of this project. We will be meeting the 100 foot setback to the maximum extent practicable, but there are some areas where it will be a bit less than 100 foot. Currently the average buffer width is >80'. I would like to clarify that we are coordinating with DCR on the buffers and meeting the setbacks to the maximum extent practicable.

I am happy to discuss this with you, and would like to eventually have a response back noting your understanding and agreement with this slight adjustment.

Thanks so much - Susan

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

From: [Lindsay Collins](#)
To: [Conner, Susan L. NAO](#)
Subject: RE: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 3:28:53 PM

No trees should be removed!

-----Original Message-----

From: Conner, Susan L. NAO [<mailto:Susan.L.Conner@usace.army.mil>]
Sent: Wednesday, April 10, 2013 3:26 PM
Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

From: [Alexander Ivanchishin](#)
To: [Conner, Susan L. NAO](#)
Subject: Re: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Thursday, April 11, 2013 1:58:45 PM

Thanks for the update. So it seems you are going to continue with the original plan with minor amendments. You all just don't get it. It's not about net tree loss. You are going to cut down old growth trees where they exist and replace them one for one with a new planted tree "somewhere within the footprint of the project. So one could clear cut an entire area and plant replacements along some fence line. That's the same logic as going into Sequoia National Park and saying we are going to cut down some of these old growth trees that add so much to the environment and our peace and tranquility but not to worry, for everyone of these trees we cut down we'll replace it with another tree somewhere within the part so there is no net loss of trees. REALLY.

AGAIN, IS THIS THE BEST OUR GOVERNMENT CAN THINK OF?

Alexander Ivanchishin
LT COL, USAF (Ret.)

"Conner, Susan L. NAO" <Susan.L.Conner@usace.army.mil> wrote:

Classification: UNCLASSIFIED
Caveats: NONE

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Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

From: [Rachel Johnson](#)
To: [Conner, Susan L. NAO](#)
Subject: Re: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 10:21:23 PM

Dear Madam: No trees whatsoever should be cut. Not only are they historic, but each is habitat for many creatures.

I am a direct descendent of Martha Custis and I do NOT support tree killing. Rachel B. Johnson

----- Original Message -----

From: Conner, Susan L. NAO

Sent: 04/10/13 03:25 PM

Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

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Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED

Caveats: NONE

The use of computer technology does not infer an endorsement of Western industrialized civilization. No compromise in the defense of Mother Earth!

From: [Adrienne](#)
To: [Conner, Susan L. NAO](#)
Subject: Re: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Sunday, April 14, 2013 10:51:29 AM

Dear Ms. Conner,

A one year old tree does not equate to a 100 year old tree. Killing a 100 year old tree and planting a 1 year old tree = a net loss of 99 years. Taking the average age of the trees slated for removal (killing) x number of trees - average age of replacement trees = the true net loss.

I urge the Government to figure out a way to leave at least 30% of the trees slated for removal. New/young trees take years of growth to create the benefits of the canopy the living trees afford to humans and animals.

Thank you for serious consideration.

Regards,
Adrienne Bacchus
1510 N. 12th Street
Rosslyn

On Apr 10, 2013, at 3:25 PM, "Conner, Susan L. NAO" <Susan.L.Conner@usace.army.mil> wrote:

> Classification: UNCLASSIFIED
> Caveats: NONE
>
> This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.
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>
>
> Susan L. Conner
> Chief, Environmental Analysis Section
> U.S. Army Corps of Engineers, Norfolk District
> 803 Front Street
> Norfolk, VA 23510
> 757-201-7390
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> Classification: UNCLASSIFIED
> Caveats: NONE
>
>

From: [Leslie](#)
To: [Conner, Susan L. NAO](#)
Subject: Re: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 3:43:21 PM

Tearing down specimen trees and later replacing them with young trees to preserve a tree count is not the issue here. The issue is removing historic trees that will never be duplicated. My father (Roger A. Barnes, West Point Class of 1942), was in the Corps of Engineers for over 35 years. I am sure he is not resting easy over in Arlington knowing that it is his beloved Corps that is being tasked with destroying the trees near his grave. What is it that isn't being made clear here? Do not take down historic trees. Do not destroy the current shade canopy. Do not cling to a design that destroys the dignity of the final resting place of so many who served their country.

Leslie Barnes Hagan

Sent from my iPad

On Apr 10, 2013, at 3:25 PM, "Conner, Susan L. NAO" <Susan.L.Conner@usace.army.mil> wrote:

> Classification: UNCLASSIFIED
> Caveats: NONE
>
> This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.
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> Susan L. Conner
> Chief, Environmental Analysis Section
> U.S. Army Corps of Engineers, Norfolk District
> 803 Front Street
> Norfolk, VA 23510
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>
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> Classification: UNCLASSIFIED
> Caveats: NONE
>
>

From: [Mary Nell](#)
To: [Conner, Susan L. NAO](#)
Subject: Re: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 5:33:28 PM

I am in shock. You truly must, must be joking. With all the feedback, you have added 23 more mature trees to cut down? Can you planning process really be that insensitive? Or maybe I am reading wrong. I will hold that thought.

Mary Nell Bryant (yes, I feel for the Veterans....but my Marine Lt. General husband feels as I do).

-----Original Message-----

From: Conner, Susan L. NAO <Susan.L.Conner@usace.army.mil>
Sent: Wed, Apr 10, 2013 3:25 pm
Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

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Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

From: one2va@verizon.net
To: [Conner, Susan L. NAO](#)
Subject: Re: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 7:16:16 PM

Additional comment for the revised EA:

Adding more trees to the removal list makes the proposal even worse despite the fact that at least one new tree will be planted for each tree removed. This does not alter the fact that this proposal would eliminate 31% of area containing trees that are 130 years old or more and that serves as a critical buffer zone for the last old growth forest in Northern Virginia. Arlington Woodlands is the only remaining remnant of a 600 acre old-growth forest on the original 1,100 acre plantation established in 1802 by George Washington Parke Custis. This is a penny-wise (extending the viability of the cemetery for only another 4-6 years) and pound-foolish (killing healthy, old trees that represent the history of this sacred land).

Mary Free
4303 35th Street South
Arlington, VA 22206

On 04/10/13, Conner, Susan L. NAO<Susan.L.Conner@usace.army.mil> wrote:

Classification: UNCLASSIFIED
Caveats: NONE

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Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

healthy

From: [Ron Wise](#)
To: [Conner, Susan L. NAO](#)
Subject: RE: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 7:58:06 PM

I assume that the trees which will be removed are old ones. If so, replacing an old tree with a new tree, even on a one-to-one basis, is unacceptable to me. It will take years for new trees to provide the beauty and the shade of new trees.

Ronald O. Wise
Arlington, VA

> From: Susan.L.Conner@usace.army.mil
> Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
> Date: Wed, 10 Apr 2013 19:25:47 +0000
>
> Classification: UNCLASSIFIED
> Caveats: NONE
>
> This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.
>
>
>
> Susan L. Conner
> Chief, Environmental Analysis Section
> U.S. Army Corps of Engineers, Norfolk District
> 803 Front Street
> Norfolk, VA 23510
> 757-201-7390
>
>
>
> Classification: UNCLASSIFIED
> Caveats: NONE
>
>

From: [Susan N Dubose](#)
To: [Conner, Susan L. NAO](#)
Subject: RE: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Wednesday, April 10, 2013 9:25:35 PM

Ms. Conner -

I was greatly disappointed with the missive you sent out. Instead of modifying the plan, you state an additional 23 trees are slated for removal. New trees, however many are planted, take many years to mature. The citizens Arlington National Cemetery will take on the appearance of a mowed down apartment complex with new seedlings here and there.

I am holding out hope that this project is reviewed by someone who understands the implications, and that the plan is greatly pared down.

Please provide the name of someone else we may contact on this project.

Thank you.

-----Original Message-----

From: Conner, Susan L. NAO [<mailto:Susan.L.Conner@usace.army.mil>]
Sent: Wednesday, April 10, 2013 3:26 PM
Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

From: [Maria "Pete" Durgan](#)
To: [Conner, Susan L. NAO](#)
Subject: RE: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Thursday, April 11, 2013 9:06:35 AM

You guys don't get it. We don't want you to tear down old growth trees and plant new ones. We want you to preserve the old trees. This message without the new plans outlined in depth doesn't help much.
Pete Durgan

-----Original Message-----

From: Conner, Susan L. NAO [<mailto:Susan.L.Conner@usace.army.mil>]
Sent: Wednesday, April 10, 2013 3:26 PM
Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

From: [Carolyn Lloyd](#)
To: [Conner, Susan L. NAO](#)
Subject: RE: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)
Date: Friday, April 12, 2013 4:10:23 PM

Dear Ms. Conner:

I have lived in the Radnor Heights/Fort Myer Heights community adjacent to Arlington National Cemetery since 1971 and visit the cemetery regularly. The surviving elements of the Custis-Lee property, representing its history both before and since becoming our national cemetery, are worth preserving. Historical context as well as the natural habitat have great meaning to many who visit the property to honor those we have lost.

I understand the desire to create space for more graves, but even if the proposed plan is pursued we will again run out of space – but then we will have lost the historic woodland and old growth trees as well.

I strongly urge that further study be taken. Once lost, we cannot recreate this forest. Planting a like number of new trees will not bring it back.

Please schedule more opportunities to talk with neighbors and other interested parties. I wish to be contacted to participate.

Thank you.

Carolyn Lloyd

1510 North 12th Street, Unit PH2

Arlington, VA 22209

ctlloyd@mindspring.com

From: "Conner, Susan L. NAO" <Susan.L.Conner@usace.army.mil>
Date: April 10, 2013, 3:25:47 PM EDT
Subject: Arlington National Cemetery Millennium Project Environmental Assessment Update (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

This announcement has been prepared to update interested stakeholders on refinements to the design for the Millennium Project at Arlington National Cemetery (ANC). As part of the public process, ANC strives to provide information and updates on the project as the design evolves. The revised EA was posted for public comment on March 12, 2013. Based on refinements to the tree survey occurring since the revised EA was posted, the tree count has been revised to reflect an additional 23 trees that will be removed. Also, for every tree removed, at least one new tree will be replanted within the project footprint, so that the project will have "no net loss" in the total tree count. These refinements to the tree count do not change the analysis of the impacts nor do they change the preferred alternative. The project team will continue to focus on minimizing the removal of trees where possible so the number of trees removed may vary slightly as the design is finalized. The comment period for the revised EA will close on Friday, April 12, 2013.

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED

Caveats: NONE

From: [Sherman Bamford](#)
To: [Conner, Susan L. NAO](#)
Cc: [Sherman Bamford](#)
Subject: Re: Comments on Arlington National Cemetery Millennium Project
Date: Friday, April 12, 2013 8:26:37 AM
Attachments: [Arlington House NRHP.pdf](#)

The following is an attachment to my comments, submitted yesterday

On Apr 11, 2013, at 11:58 PM, Sherman Bamford wrote:

Sherman Bamford

PO Box 3102

Roanoke, Va. 24015-1102

(540) 343-6359

bamford2@verizon.net <<mailto:bamford2@verizon.net>>

April 11, '13

Comments on Arlington National Cemetery Millennium Project

Susan L. Conner

Chief, Environmental Analysis Section, U.S. Army Corps of Engineers, Norfolk District,

803 Front Street,

Norfolk, VA 23510

Dear Ms. Conner and Decision-makers:

Arlington National Cemetery is our nation's premier military cemetery. I sincerely believe that by preserving its surroundings, we also protect the dignity of the national cemetery, preserving the natural beauty of Arlington National Cemetery out of respect for those buried there and their families who visit.

I object to Alternative E of the planned expansion known as the Millennium Project and ask you to consider additional alternatives. Alternative E would impact 31% of the area under study containing trees 145 to 165 years old. This is a tremendous loss of older forest in order to extend the viability of the cemetery for only 4-6 years. In addition this area is a critical buffer zone for an even older forested area. Its elimination will endanger that forest, the last old growth forest in Northern Virginia that is over two centuries old.

Sherman Bamford
PO Box 3102

Roanoke, Va. 24015-1102
(540) 343-6359
bamford2@verizon.net

From: [Ewing, Amy \(DGIF\)](#)
To: [Conner, Susan L. NAO](#)
Cc: [Ellis, Charles \(DEQ\)](#)
Subject: RE: DGIF Comments on ANC Millennium Project (UNCLASSIFIED)
Date: Thursday, April 11, 2013 12:55:21 PM

See my input in ALL CAPS below (caps only used to differentiate from your text, does not indicated tone).

Hope this helps move this along for you.

Thanks,
Amy Ewing

Environmental Services Biologist | VA Dept. of Game and Inland Fisheries | 4010 West Broad St.
Richmond, VA 23230 | 804-367-2211 | www.dgif.virginia.gov

-----Original Message-----

From: Conner, Susan L. NAO [<mailto:Susan.L.Conner@usace.army.mil>]
Sent: Wednesday, April 10, 2013 12:07 PM
To: Conner, Susan L. NAO; Ewing, Amy (DGIF)
Cc: Ellis, Charles (DEQ)
Subject: RE: DGIF Comments on ANC Millennium Project (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Amy-
I don't think I ever heard back from you on this? We are planning to sign a FONSI this month, so I would like to ensure we have this resolved asap. An email with your concurrence (and/or discussion) will suffice.

Thanks - Susan

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

-----Original Message-----

From: Conner, Susan L. NAO
Sent: Friday, March 01, 2013 12:42 AM
To: 'Ewing, Amy (DGIF)'
Cc: Ellis, Charles (DEQ)
Subject: DGIF Comments on ANC Millennium Project (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Hi Amy -
Thanks for your coordination on the ANC Headstone Removal Project - that work is nearly complete now. I do have another project that I would like to discuss.

Attached are the compiled comments from the Commonwealth on the ANC Millennium Project. I do have some concerns with the DGIF comments on Page 4 of the attachments. My concerns are outlined below. One overriding comment - several issues (I believe) exceed the requirements of "Enforceable Policies of the VCP," and thus should be removed (or modified and clarified accordingly).

I have attempted to explain below why, for each bullet, these are not practicable (or necessary) for this project.

A. Page 4, Item 1(b) (DGIF)

Suggest that the 1st, 2nd, 3rd and 6th "bullets" be removed, as they are not practicable for such a small width stream isolated from the Potomac by thousands of feet of pipe, and do not make sense to apply to 1st and 2nd order stream restoration projects.

The bullets needing removal are:

- * Adhere to a time-of-year restriction from February 15 through June 30 of each year; [Note: No anadromous fish are affected by this work due to isolation by the downstream pipe system]
- * Conduct any in-stream activities during low-flow or no-flow conditions; [Note: The flow is small enough to easily handle with pumps]
- * Use non-erodible cofferdams or turbidity curtains to isolate construction areas; [Note: A pump-a-round will be used due to small size]
- * Restore original streambed contours; [We are raising the streambed to reconnect to the floodplain so this is not applicable.]

BASED ON MY READING OF THE FCD, NONE OF THE ABOVE ARE REQUIRED, THEY ARE SIMPLY RECOMMENDATIONS WE HAVE MADE FOR THE PROTECTION OF VALUABLE WILDLIFE AND FISHERIES KNOWN FROM THE AREA. THE ONLY "REQUIREMENT" I INCLUDED TO CONFIRM CONSISTENCY WAS ADHERENCE TO EROSION AND SEDIMENT CONTROLS. (See 1(c) Conclusion)

B. Page 13, Item 3(c):

Suggest bullet #2 be revised to reflect that encroachment into the 100ft perennial stream buffer could be allowed by DCR as noted in the EA; and that there are no regulatory requirements for a 100 ft buffer on intermittent streams and only on wetlands contiguous and connected by surface flow to a perennial stream. This bullet currently states:

- * Maintain undisturbed, naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams - and should be revised.
- We have coordinated with DCR on this issue and have committed to continue this coordination throughout the life of the project.

AGAIN, SIMPLY RECOMMENDATIONS FOR THE PROTECTION OF WILDLIFE RESOURCES, NO REGULATORY REQUIREMENTS ASSOCIATED WITH THEM. NO NEED TO REMOVE OR REVISE THESE COMMENTS.

C. Page 14, Item 3(c):

Bullet #4 (top of page 14) should be removed. This is not a regulatory program requirement and not required by development and public works projects (only mitigation banks to my knowledge):

- * In removing trees or clearing ground, the proponents should adhere to a time-of-year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of each year.

This could have major schedule ramifications. Basically you would have to cut down every tree necessary to prosecute the work between August 16 and March 14. For example, if your contract NTP occurs on March 16 - you have to wait 5 months to start work. On a project of this scale, that would be devastating.

I would like to discuss these issues with you - we will be re-releasing a Revised version of the EA in March and I would like to resolve these issues so that I can reflect the appropriate coordinate in the EA.

AGAIN, SIMPLY RECOMMENDATIONS FOR THE PROTECTION OF WILDLIFE RESOURCES, NO REGULATORY REQUIREMENTS ASSOCIATED WITH THEM. NO NEED TO REMOVE OR REVISE THESE COMMENTS. THESE COMMENTS, IN PARTICULAR, ARE TO ASSIST YOU IN COMPLIANCE WITH THE MBTA.

Best regards - Susan

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
757-201-7390

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

From: [James Richardson](#)
To: [Conner, Susan L. NAO](#)
Subject: Re: Old Growth Trees on Arlington Cemetery Grounds
Date: Saturday, March 16, 2013 1:02:12 PM

Dear Ms Conner,

I am sorry that I mixed issues in my recent email to you, but it does provide insight into why we are feeling overwhelmed by the loss of green space and trees in Arlington. The Rt. 50 redesign was presented to our civic association by the engineers and designers and we were shocked by the lack of priority given to the trees along this heavily used roadway. There must be solutions to offer to save or to replace as many as possible. Please give this important aspect of road design your attention. We are rapidly running out of tree canopy here in Arlington.

James J. Richardson

Caroline Haynes
713 N Edison Street
Arlington , VA 22203

April 11, 2013

Ms. Susan L. Connor
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front ST
Norfolk, VA 23510

Re: Arlington National Cemetery Millennium Project revised Environmental
Assessment

Dear Ms. Connor:

I appreciate having this opportunity to comment on the revised Environmental Assessment (EA) on the proposed Millennium expansion project at Arlington National Cemetery (ANC). In brief, the design of the proposed project remains unnecessarily destructive to historic and natural resources and the revised EA does little more than reference studies that were missing from the original EA without addressing substantive comments that have been raised about this project.

Both the process and the product for this proposal are seriously flawed. As currently designed, the project unnecessarily puts into conflict the shared and deeply held values of properly recognizing our veterans; protecting unique historical and ecological resources, and; abiding by the law. Because the process was rushed and did not adequately consider alternate views, the resulting product violates the public trust and would unnecessarily destroy irreplaceable resources. The Millennium expansion project does not need to be either an expansion of the Cemetery or preservation of old age forest with high historical and ecological value – with a better design and a better process it can be both.

Public Law 107-107, Section 2863 (h) (2), which transferred 12 acres of Section 29, from the Department of Interior to the Department of Defense for purposes of expanding the operations of the Cemetery specifically states: “The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are *designed to meet the contours of Section 29*” (italics added).

In adopting the legislation for the transfer of the section of Arlington House Woods from the National Park Service to the Department of Defense, Congress recognized the importance of designing a project that preserves the contours of this natural woodland as a backdrop both to the Arlington House – Lee Mansion and to Arlington

National Cemetery. The Millennium project as it is currently proposed does not meet this requirement.

Specifically, the construction of the loop road into the steep ravine and across a streambed will require a high degree of land disturbance and infilling which will significantly change the existing topography. According to the EA, “(t)he Millennium project will require significant earthwork” (p. 95). As currently designed, the project will require over two-thirds of a mile of retaining walls of up to three-stories high and cutting and filling over 100,000 cubic yards of soil (EA p. 95). Given this “high degree of land disturbance”, a full Environmental Impact Statement needs to be conducted.

Likewise, the EA notes that “NEPA requires considerations of both context and intensity.” *“Significance of impacts is determined by examining both the context and intensity of the proposed action (40 CFR 1508.27).”* (EA. P. 94) Historically, the 12 acres transferred to DOD is considered to be a part of Arlington House Woods and is listed on the National Register for Historic Places and the remaining section is listed as a Virginia Native Plant Society Registry Site. In this project, *both* context and intensity are significant, and yet the EA fails to follow the NEPA regulations and purports to make a “finding of no significant impact” (FONSI).

Other alternatives that would be less damaging to the topography and existing old-age trees were not adequately considered. Specifically, the analysis of alternative “F” in the EA is misleading and inaccurate, both in the projected loss of trees and in the analysis of its impact on the Chesapeake Bay Protection Act. The Army Corps of Engineers has yet to provide an adequate response to the repeated question (both at the ANC site visit on March 16, 2013 and at the National Capital Planning Commission on April 4, 2013) of why the road isn’t redesigned so that it does not cross the stream but instead loops around through the section closest to Ft. Myer and parallel to McNair Road. Based on the EA, this design option was not even considered and no explanation has been given for why it was not considered. By all appearances, the project can and should be redesigned to minimize the destruction of Arlington House Woods. This would provide a buffer to the adjacent old-growth forest and would provide an aesthetic backdrop to the expansion project – a feature that would add immeasurably to the natural value and beauty of Arlington National Cemetery.

Varying estimates have been provided as to the average annual number of initial burials at Arlington National Cemetery of between 5,000 (statement by Colonel Bruzese on March 16 site visit) to 7,000 (EA, p. 18). Based on these estimates and given that the current design would create an additional 30,000 initial burial sites, as proposed, this project would extend the operations of the cemetery of between 4.2 and 6 years. Redesigning the project to meet the requirements of the law would have a small impact on the longevity of the operations of the cemetery but would have a tremendous impact on saving irreplaceable historical, ecological and cultural resources.

Rushing this project through has also resulted in a failed NEPA process. The consulting agencies were told that the project will be at the 95% design stage within days of the April 12, 2013 deadline for public comments on the revised EA and ANC representatives at the National Capital Planning Commission on April 4, 2013 publicly stated that the design was “essentially 100% complete”. This reveals a blatant disregard for the NEPA process in soliciting and responding to the range of significant issues raised by the public.

For all of the above-mentioned reasons, this project needs to be redesigned and the process for considering design alternatives needs to follow both the NEPA regulations as well as the law which transferred the property for the purpose of expanding the Cemetery. Likewise, a thorough Environmental Impact Statement needs to be conducted to ensure that the complex suite of issues in this project are fully addressed.

Sincerely,

Caroline Haynes

cc: Arlington County Board
Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran

From: [Carole Robinson](#)
To: [Conner, Susan L. NAO](#)
Subject: Revised Environmental Assessment for the proposed Millennium expansion project for Arlington Cemetery
Date: Thursday, April 11, 2013 2:35:31 PM

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 32510

Dear Ms. Conner,

I am writing to oppose the Millenium Expansion Project for Arlington Cemetery as currently designed. I am concerned about the impact on the Arlington House Woods which are integral to Lee Mansion. They are historically significant and the current plan poses environmental threats to their undisturbed stream bed.

I do not believe we should make such short-sighted decisions as to damage irreplaceable resources such as Arlington House Woods for a very short term of benefit. A few years of additional operational use should not be worth the loss of irreplaceable treasures.

Sincerely,
Carole Robinson
2420 N Nelson Street
Arlington, Virginia 22207

From: [HENRY BROWN](#)
To: [Conner, Susan L. NAO](#)
Subject: RT 50 Tree removal
Date: Saturday, March 16, 2013 11:33:59 AM

Susan Conner, U.S. Army Corp of Engineers, Norfolk District

Dear Ms Conner

I am writing to request consideration of the trees abutting RT50. As a citizen of Arlington, I am appalled at the wanton destruction of the tree canopy. Yes, I fully understand that, for the contractors doing the work along the highway, the removal of existing trees is the most cost effective way to get their job done, but I also realize these trees add, materially, to the environment, the visual attributes for those traveling the road and for those who live alongside the road; also trees perform the very necessary conversion of automobile-produced carbon dioxide to oxygen. Are these benefits not worth a great deal to all of us? This country is reaching a place where the people, such as yourself, must take action to preserve our environment for those who follow.

Please help,

Henry C Brown
522 N Lincoln St
Arlington, VA 22201

From: [Sierra Club](#) on behalf of [Carl Cunningham](#)
To: [Conner, Susan L. NAO](#)
Subject: Save Old Growth Forest at Arlington National Cemetery
Date: Monday, April 08, 2013 10:58:43 AM

Apr 8, 2013

Susan L. Conner U.S. Army Corps of Engineers, Norfolk District

Dear U.S. Army Corps of Engineers, Norfolk District,

Arlington National Cemetery is our nation's premier military cemetery. I sincerely believe that by preserving its surroundings, we also protect the dignity of the national cemetery, preserving the natural beauty of Arlington National Cemetery out of respect for the those buried there and their families who visit.

I object to Alternative E of the planned expansion known as the Millennium Project and ask you to consider additional alternatives. Alternative E would eliminate 31% of area containing trees 130 years old or older. This is a tremendous loss of older forest in order to extend the viability of the cemetery for only 4-6 years. In addition this area is a critical buffer zone for an even older forested area. Its elimination will endanger that forest, the last old growth forest in Northern Virginia.

Most of the wooded area proposed for cutting is in the National Register of Historic Places (Arlington House NRHP). The mature forests proposed for cutting are the most important landscape characteristic within the project area (Millis et al, 1998, p. 111). Only a few miles from the Potomac, the project would also involve extensive ground disturbance in a watershed that is already impacted by run-off from other adjacent federal government properties. Over 18 species of neo-tropical migratory birds have been documented in the project area, according to surveys cited in the Environmental Assessment. The project would eliminate important wooded habitat for songbirds in an area that is otherwise highly developed and urbanized.

In addition, the law that transferred the property for this cemetery expansion specifically states that the agency "shall" use the transferred property "for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29". The movement of 100,000 cubic yards of dirt necessary to complete the Millennium Project would not seem to match the law's direction to Arlington National Cemetery management.

With the pending opening of a new columbarium and the completion of the transfer of the Navy Annex grounds for use by Arlington National Cemetery there is still time to revise the planned expansion. A new plan will preserve both the character of the grounds, honor the intent of the law, and consider other alternatives that minimize the impacts to the quiet solitude, the ecological and cultural resources of the area while still providing additional burial spaces for this area's most hallowed grounds.

Sincerely,

Mr. Carl Cunningham
3417 N George Mason Dr
Arlington, VA 22207-1839

From: [Carol Shuh](#)
To: [Conner, Susan L. NAO](#)
Cc: [Manica_Noziglia@warner.senate.gov](#); [Amanda_Chuzi@kaine.senate.gov](#); [Tim.Aiken@mail.house.gov](#); [Carlton.Hart@ncpc.gov](#)
Subject: Save the Cemetery Trees!
Date: Thursday, April 11, 2013 10:37:45 PM

Dear Ms. Conner:

The refinements to the design for the Millennium Project at Arlington National Cemetery (ANC) are unsatisfactory. The design stinks.

It's pretty clear that the legal process was not followed in creating the design. You should be concerned about that.

More importantly, the design ruins what it is meant to preserve. People want a beautiful atmosphere when they go to a graveyard to mourn their dead. They want trees and flowers. If we wanted to be efficient about burying the dead, we would pave our cemeteries with asphalt so people could drive their cars directly to the desired grave. This is not what people want!

Please dump your design and go back to the drawing board. Please do not destroy irreplaceable environmental, historical, and emotional resources. Please honor our heroes by preserving the very things they fought for!

Sincerely,

Carol D. Shuh
7201 Sewell Ave.
Falls Church, VA 22046
(703) 533-7538

From: [Kathy Kelly](#)
To: [Conner, Susan L. NAO](#)
Subject: Save the historic grounds of Arlington National Cemetery
Date: Thursday, April 11, 2013 11:35:27 AM

Ms. Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

We are disappointed to learn that Arlington National Cemetery is proposing to strip the woods behind Arlington House and to recontour the steep valley to gain only a few more years of burial space. In the 1990s we spoke out against proposals to do this same expansion. At the time, we walked through the woods. The site is too steep, so the necessary earth moving will be irrevocable and will forever change the historic grounds of this great cemetery.

Yesterday our friends who are here from California spent several hours walking through the cemetery, absorbing the restful and historical beauty of the grounds, including the woods behind the Custis-Lee Mansion.

Environmental assessments have yet to put a value on the spiritual loss that would occur as a result of this proposal. Please consider the values that are present in the old landscape.

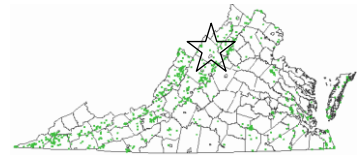
Sincerely,
James F. Wright
Kathleen L. Kelly
Falls Church, VA 22041

cc: Senator Tim Kaine
Senator Mark Warner



MOUNT VERNON GROUP

ALEXANDRIA, ARLINGTON COUNTY, FAIRFAX COUNTY, FALLS CHURCH, AND PRINCE WILLIAM COUNTY
VIRGINIA



April 11, 2013

Ms. Susan L. Conner
U.S. Army Corps of Engineers - Norfolk District
803 Front Street
Norfolk, VA 23510

Re: Arlington National Cemetery (ANC) Millennium Project

Dear Ms. Conner:

The Mount Vernon Group, Virginia Chapter, of the Sierra Club appreciates the opportunity to comment on the revised Environmental Assessment (EA) for the ANC Millennium Project. The additional information provided has been very useful in continuing to evaluate the Project and its impact. Based on that review, we continue to believe that the design should be revised to reduce environmental impact and maintain the quality of the Cemetery.

Of primary concern is the extensive revision of the current topography. The Public Law that transferred Section 29 to the Department of Defense (107-107, Section 2863 (h) (2)), states: "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." The planned route of the "loop road" will require a major degree of contour revision, i.e. significant changes to the landscape.

There are alternatives that would be less damaging to the topography, and therefore in compliance with the Public Law, and to existing old-age trees that would otherwise be removed. These need to receive consideration. For example, during the Millennium Project site visit on March 16, 2013, a question was posed as to why the proposed loop road that curves across the stream and into the steepest and most heavily wooded section could not curve in the opposite direction toward McNair Road. The response was that the topography in the direction toward Fort Myer was too steep. However, this area is less steep than the stream valley and the alternative route would not require crossing the stream bed, nor require infilling an existing stream valley and, overall, would result in significantly less land disturbance. The geological study included in the revised EA identifies a seep in the project area. Impacting this seep could also be avoided by a redesign of that meets the requirements of the law to design within the contours of the land.

Varying estimates have been provided as to the annual average number of burials at Arlington National Cemetery, ranging between 5,000 and 7,000. Based on these estimates for Alternative E an additional 30,000 burial sites would be created, extending the operation of the cemetery only between 4.2 and 6 years. Redesigning the project to meet the requirements of the law would have a relatively small impact on the longevity of the operations of the cemetery but

would have a tremendous impact on saving irreplaceable historical, ecological and cultural resources. If the new columbaria planned for the area to the west of the proposed access road were increased in size, the decrease in burial sites could be reduced or eliminated.

Almost half of the woods that are to be cleared are part of the historical grounds of Arlington House, listed under the National Register of Historic Places. As such the impact on the grounds should be minimized, not treated as insignificant. In addition, recent briefings (such as at the National Capital Planning Commission meeting on April 4, 2013) have revealed that the design process for Alternative E is in near 100% completion. Under NEPA, public comment must be taken into consideration prior to final design. How is it possible that the planning work was being completed even as comments were still in preparation? The work by the Army Corps would appear to violate the sense of the law, if not the law itself. With stakeholders now being told that the new space could be ready by 2017 (an update from the March 16 briefing where attendees were provided a date of 2019 for the Millennium Project's completion) there is every indication that there is enough time to complete the process under the NEPA requirements, consider additional alternatives, conform to NRHS standards, adhere to the Section 29 contour stipulations and still have space ready in time to meet the eventual need.

The Sierra Club recognizes the pressures to extend the longevity of the operations of the Cemetery. We respect the place Arlington National Cemetery has in regard to honoring our national heroes and their families and to provide them with a final resting spot in our nation's premier national cemetery. However, we believe that it is possible to both develop a project that extends the operations of the Cemetery and preserves the unique environmental habitat. The current proposal falls short of achieving that goal.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rick Keller". The signature is written in a cursive, flowing style.

Robert C. (Rick) Keller, Chair, Mount Vernon Group
Virginia Chapter, Sierra Club

Cc: Senator Timothy M. Kaine
Senator Mark R. Warner
Congressman Jim Moran
The Honorable John M. McHugh, Secretary of the Army

From: [Susan Titus](#)
To: [Conner, Susan L. NAO](#)
Subject: the trees at Arlington National Cemetery
Date: Thursday, April 11, 2013 8:24:36 AM

Hello Susan Conner,

This is a plea, and I hope one of many, to ask that the trees at Arlington be preserved and not removed for more burial sites. Could not another site be opened away from Arlington? It is a pity that so many sites are needed; it is inevitable that veterans die, of course, but if we were involved in fewer wars at least they wouldn't have to die in combat. Preserving the beauty and tranquility of the cemetery at Arlington is paramount and the trees make such an important contribution to that aspect of the site. Given that these old growth beauties are one of the few (if not the only) stand in the area around Washington, I am strongly against their removal.

The information about their possible removal came to me through the Sierra Club newsletter. Thank you for listening.

Sincerely, Susan Titus
33137 River Mill Road
Richardsville, VA 22736

From: [Alexander Ivanchishin](#)
To: [Conner, Susan L. NAO](#)
Subject: Tree cutting in Arlington Cemetery
Date: Friday, April 05, 2013 10:42:05 AM

Mrs. Conner,

I just read an article about plans to cut down old growth trees in the cemetery to expand burial sites. Everyone knows that one day the cemetery is going to run out of space. So while you execute this plan, cut down all these trees that have been there for over hundred years, there will come a day (some estimates are 7 -12 years) where you are right back to the fact that the cemetery is out of space. Seems to me that the easiest thought process was used here....cemetery needs more space...trees occupy space....remove trees equals more space. Really, is that the best the government has to offer.

I'm sure there are other options to include the reality check that there is a finite number of spots in the cemetery and that's it. And don't make the argument that I'm saying trees are more important than veterans rights to be buried in Arlington...not saying that. The fact is that not everyone who wants to be buried in Arlington will be able to be buried there. I heard there is an idea to build another Arlington-like cemetery or an annex...that may or may not be viable, don't know. You ought to study that. You need to be looking at the long term solution or face the fact that Arlington is out of space.

I'm not a fan of this tree removal plan that may do more environmental harm than good, will detract from the landscape and tranquility that is Arlington. The government can do better than this idea.

I'm forwarding my concerns to both Virginia Senators Warner and Kaine and Rep Moran.

Respectfully,
Alex Ivanchishin, Lt. Col. USAF (Ret.)

From: [Lindsay Collins](#)
To: [Conner, Susan L. NAO](#)
Subject: Tree destruction
Date: Tuesday, March 19, 2013 12:41:20 PM

Good day. I am an Arlington resident and I care very much about respecting and preserving the environment and our nation's landmarks. The plan to destroy Arlington Cemetery's trees is obscene to me. Destroying these ancient wonders and replanting trees and bushes is disgraceful. The plan not only destroys trees that are priceless assets to the atmosphere, but also are priceless landmarks of our nation's history and the men and women who died for it. I strongly urge that those who are supposed to be stewards of this beautiful park, save its trees...every one of them.



ARLINGTON COUNTY URBAN FORESTRY COMMISSION
2700 S. Taylor St., Arlington, VA 22206

March 28, 2013

Ms. Susan L. Conner
U.S. Army Corps of Engineers - Norfolk District
803 Front Street
Norfolk, VA 23510

Re: Comments on Arlington National Cemetery (ANC) Millennium Project

Dear Ms. Conner:

The Urban Forestry Commission (UFC) of Arlington County appreciates having the opportunity to comment on the revised Environmental Assessment (EA) of the ANC Millennium Project and is cognizant of the additional material collected, especially the more comprehensive tree survey and the geological study. We continue to have serious concerns about the existing proposal.

Public Law 107-107, Section 2863 (h) (2), which transferred the portions of Section 29 from the Department of Interior to the Department of Defense for purposes of expanding the operations of the cemetery specifically states: "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium *that are designed to meet the contours of Section 29.*" (italics added). The UFC does not believe that the construction of the loop road as it is currently proposed fulfills this requirement that the design meet the contours of Section 29. Specifically, the construction of the loop road will require a high degree of land disturbance and in-filling which will significantly change the existing topography.

The UFC is concerned that other alternatives that would be less damaging to the topography and existing old-age trees were not adequately considered. For example, several people attending the Millennium Project site visit on March 16, 2013, questioned why the proposed loop road curves across the stream and into the steepest and most heavily wooded section, rather than curving in the opposite direction toward McNair Road. The response given by Colonel Bruzese during the March 16 site visit was that the topography in the direction toward Fort Myer was too steep and would not allow for this. However, this area is much less steep than the stream valley and such an alternative would not require crossing the stream bed, would not require infilling an existing stream valley and, overall, would result in significantly less land disturbance. The UFC strongly recommends that as much of the existing wooded section be maintained, both to provide a buffer to the adjacent old-growth forest and to provide an aesthetic backdrop to the expansion project.

The geological study included in the revised EA identifies a seep in the project area (EA, p. 64). Impacting this seep could also be avoided by a redesign of that meets the requirements of the law to design within the contours of the land.

Given that the "Millennium project will require significant earthwork", require the displacement of an estimated 100,000 cubic yards of cut and fill soil and require construction of over two-thirds of a mile of retaining walls up to three-stories tall (EA, p. 95), we believe that the current finding of "no significant impact" is inappropriate and continue to urge that a full Environmental Impact Statement be conducted.

We also recommend that additional mitigation of any expansion project include funding to treat the invasive species infestation in the remaining National Park Service portion of Arlington House Woods. Any disturbance in this area is going to further stress the remaining section of woods and additional mitigation efforts are needed to protect what little remains. Likewise, the proposal to replant 600 small trees will replenish only a small fraction of the eco-system services lost from removing over 800 mature trees. Additional tree planting is also recommended.

Varying estimates have been provided as to the annual average number of burials at Arlington National Cemetery of between 5,000 (statement by Colonel Bruzese on March 16 site visit) to 7,000 (EA, p. 18). Based on these estimates and given that the current design would create an additional 30,000 initial burial sites, as proposed, this project would extend the operations of the cemetery of between 4.2 and 6 years. Redesigning the project to meet the requirements of the law would have a relatively small impact on the longevity of the operations of the cemetery but would have a tremendous impact on saving irreplaceable historical, ecological and cultural resources. If the columbaria planned for the area to the west of the proposed new access road were expanded in size, the decrease in burial sites could be reduced or eliminated.

The UFC recognizes the pressures to extend the longevity of the operations of the cemetery, but must emphasize again that this is a very short-term solution to a long-term problem. We also respect the desires of many of our national heroes and their families to have a final resting spot in our nation's premier national cemetery. However, we believe that it is possible to both develop a project that extends the operations of the cemetery and to preserve the contours of Section 29, as required by law. In our view, the current proposal does not meet those dual objectives.

Sincerely,

A handwritten signature in cursive script, reading "Dean F. Amel". The ink is dark and the signature is fluid, with a large, stylized 'D' and 'A'.

Dean Amel, Chair

cc: Arlington County Board
Senator Mark Warner
Senator Tim Kaine
Congressman Jim Moran
National Capital Planning Commission
Secretary of the Army



Virginia Forest Watch

14031 Independence Road, Ashland, VA 23005

804-314-2225

www.virginiaforestwatch.org

April 8, 2013

Susan L. Conner, Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510
By electronic mail to: susan.l.conner@usace.army.mil

RE: Arlington National Cemetery Millennium Project Environmental Assessment

Dear Ms. Conner:

As large numbers of WWII, Korean and Vietnam veterans choose to be buried at Arlington National Cemetery, finding adequate space is becoming an issue. As part of the Millennium Project, cemetery superintendent Metzler has proposed adding acreage from several sources, including the Navy Annex, Ft. Meyer and the Arlington Woodlands.

The 28-acre Arlington Woodlands is a prime example of Eastern climax hardwood forest. This old growth forest is the same forest type that was present when George Washington Parke Custis acquired the land in 1802. In fact, the woods are regenerated from the original forest, with many trees dating back to the late 1860s, shortly after the first soldiers were buried at Arlington.

Virginia Forest Watch opposes the use of the Arlington Woodlands for cemetery expansion for several reasons and urges the use of the alternative lands.

First, with the available land from the Navy Annex, Ft. Meyer and the Southgate Road right-of-way, it is unnecessary to use this piece of land to meet the goal of expansion.

Second, the Woodlands represent history much the same way as Arlington House or the Tomb of the Unknowns. In any urban environment, the opportunity for residents and visitors to experience true old growth forestland is a rare and rewarding opportunity. For many of the 4.5 million annual visitors to Arlington National Cemetery, this is a once in a lifetime opportunity to see a magnificent forest that is very much like the one that George Washington Parke Custis and Robert E. Lee gazed upon as they held this sacred land.

Finally, the environmental assessment fails to include an evaluation of the contribution of the forestlands to feelings of solace and peace-of-mind that are known to aid spiritual health and well-being to any cemetery visitor. There is an unquestionable spiritual

Ms. Conner
April 8, 2013
page two

value to old growth forestlands in any cemetery -- and particularly in such a solemn place as a national cemetery dedicated to honoring those who have served our nation. The cultural value of the solace and comfort which forestlands provide has not been accounted for in the decision-making process.

Development of the woodland ravine would be an unnecessary tragedy of national scope.

On behalf of our members, I urge the approval of an alternative that does not permanently destroy our national and natural heritage, and instead consider permanently protecting the forested ravine as a national treasure.

Sincerely,

A handwritten signature in cursive script that reads "Tammy Belinsky". The signature is written in dark ink and is positioned above the printed name.

Tammy L. Belinsky,
Chair



**Mid-Atlantic
Regional Office**

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April 15, 2013

Ms. Susan L. Connor
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front ST
Norfolk, VA 23510

Dear Ms. Connor:

Re: Arlington National Cemetery Millennium Project, draft revised
Environmental Assessment

We are writing on behalf of the nonpartisan National Parks Conservation Association (NPCA), and our more than 750,000 members and supporters across the country. NPCA is the only national non-profit organization dedicated to protecting and enhancing America's national parks for this and future generations. Thank you for the opportunity to comment on the revised draft Environmental Assessment (EA) for the Millennium Project at Arlington National Cemetery, and we appreciate your agreement to allow NPCA to submit comments today.

The proposed project neighbors Arlington House, the Home of Robert E. Lee, which is part of the National Park System and managed by the National Park Service (NPS). It includes 12 acres transferred more than a decade ago from the Arlington House grounds to the Department of Defense (DoD), for the purpose of expanding Arlington National Cemetery.

Review of the project requires recognition of the threefold significance of the Millennium Project site. First, the site is to be incorporated into Arlington National Cemetery, without question one of our country's most hallowed places where we honor the sacrifices made by heroes of past and present wars. Second, before the cemetery existed, this land was part of the historic Arlington estate, home of the Custis-Washington families (among America's most influential families), and of Robert E. Lee, one of history's greatest generals. Thus the site holds remarkable historic significance. Third, the site includes a significant mature forest, part of the Arlington House Woods, among Arlington's oldest forests, and one of a dwindling number of such forests remaining in the national capital region.

NPCA's comments are intended to respect each of these three cultural values. Respectfully, we submit that the current project design, including the preferred alternative, does not. Despite the Army Corps' efforts to date, and the project's positive evolution since early proposals that included cutting most or all of the woods on the site, the project design as set forth in the revised draft EA unnecessarily continues to put into conflict the broadly and deeply shared American values of



honoring our veterans, and of protecting the historic context of meaningful sites in American history.

Although established for different reasons, Arlington National Cemetery and sites in America's National Park System are established for the ages. The details provided in the revised draft EA fall short of doing justice to Arlington National Cemetery, Arlington House, and the site's historic context. In order to address significant and substantive concerns, to fully protect the significant resources at risk, and to provide a project that preserves the area's historic context, we request that the Army Corps complete a full Environmental Impact Statement.

With an improved design, the Millennium Project can properly honor our veterans while preserving the site's historic context and ecological values. We are committed to working with the Army Corps, Arlington National Cemetery, and other stakeholders to achieve such a design. Until that point, we have the following concerns.

I. The Millennium Project's preferred design, and the process followed to select it, appear to violate NEPA and other federal and possibly state statutes.

The project design and review process to date appear to violate the National Environmental Policy Act (NEPA) as well as the statute that authorized transfer of a portion of the Arlington estate to the Arlington National Cemetery. We also are concerned that the project may violate the Chesapeake Bay Preservation Act.

A. The process and timetables do not meet standards for meaningful public involvement.

The Corps has scheduled meetings *this week* – almost immediately following the close of the current comment period -- to present 95% engineering drawings for its preferred alternative. Kathryn Condon, Executive Director of Arlington National Cemetery (ANC), and other representatives of the Cemetery addressed the National Capital Planning Commission on April 4, 2013, and stated that *planning for this project was virtually 100% complete*. Participants in the March 16, 2013 official site visit heard a similar message from project leaders on the tour – this project is done. Such public statements by project officials tend to discourage continued public engagement, notwithstanding project representatives' affirmative statement that staff will continue to consider public comments.

This pattern of actions suggests a project being rushed through, with minimal real consideration of substantive and significant concerns raised by the interested public, and a clear violation of the intent of NEPA.



B. The project violates NEPA requirements to avoid, minimize, and mitigate impacts.

There is no evidence in the draft EA that the Corps considered an alternative road design to minimize impacts on the project's context and environmental values that would also meet the project's operational standards. A road design utilizing what is largely open space on the former Fort Myer grounds, on the McNair Road side of the project site, rather than bulldozing the road into the mature Arlington House Woods stream valley, could decrease dramatically the project's harmful impacts on the project's historic context and ecological resources. Such a design would also concentrate primary earthmoving activities on the portions of the site not subject to Public Law 107-107 (see discussion below).

Redesigning the road also would avoid cutting through the historic stone wall that formerly marked the Arlington National Cemetery boundary. The preferred alternative would remove 1,357 of approximately 5,653 linear feet of the remaining historic Seneca sandstone boundary wall of the Cemetery (Section 106 Appendix, pp.127-128), a significant and potentially avoidable loss of context. While we have heard that the project continues to evolve, and that number may now be several hundred feet lower, the point remains that wall is a contributing element of the site's historic context, and impacts to it must be avoided and minimized. Although the issue of such a redesign of the road was raised by commenters on the first draft EA, it was not addressed in the revised EA, yet is a fundamentally important comment with the potential to drive project design towards a result that honors the three-fold significance of the site.

In addition, much of the project's impacts appear to result from siting and construction of the columbaria. The revised draft EA provides insufficient information to determine whether those impacts could be avoided by meeting the Cemetery's needs for columbaria in other newly-opened sections of the cemetery.

A design that sites the loop road entirely on the Fort Myer side of the stream would avoid and minimize most of the impacts of the draft revised EA's preferred alternative, and, rather than fragment the Arlington House Woods, would restrict the direct impacts to the edges of the woods, thereby preserving the overall ecology of the woods (see below). While such a design may reduce the number of burial sites the project provides, it also would be consistent with Public Law 107-107's directive to design a project consistent with the contours of the site (see below).



**C. The revised draft EA's dismissal of the impacts on the historic
Arlington House Woods is premature and represents insufficient analysis.**

Throughout the draft revised EA, the Millennium Project is described as adjacent to the Arlington (House) Woods (p. 3 and p. 112), which are defined as those managed by the NPS. However, as discussed extensively by the National Trust for Historic Preservation (letter to Army Corps, April 12, 2013), this focus on arbitrary property lines ignores the fact that the Arlington House Woods include woods located both on NPS property and on the parcel transferred to DoD.

The 12 acres transferred from the NPS to DoD are a part of both the Arlington House Woods' designation on the National Register for Historic Places, and designation as a registry site with the Virginia Native Plant Society. The change in the parcel's ownership as a result of the property's transfer does not change these facts. However, language in the revised draft EA tends to skirt the reality, and contribute to actions and analyses that neglect the historic and ecological significance of the woods on the Millennium Project site, and the impact of the project on those resources.

The regenerated woods on the project site have historical significance in their own right, [National Trust for Historic Preservation to Army Corps of Engineers, April 12, 2013], and a proper EA or EIS must consider the impact of the Millennium Project on those woods.

But setting aside the impacts to the woods on the Millennium Project site, the preferred project alternative would result in the Arlington House Woods on NPS land losing both its forested buffer, and its larger context. These impacts must be fully analyzed, and dismissal of this topic is a serious deficiency in the revised draft EA.

Larger and deeper stands of forest generally have higher wildlife habitat values than do smaller "edge" woods. While the ecological functioning of the Arlington House Woods clearly will be compromised by shrinking the footprint of the overall wooded area, the draft revised EA provides no analysis of the current functioning of the Arlington House Woods as interior forest, what species may currently depend on this increasing rare type of habitat, nor what the potential impacts would be from fragmentation, and of shrinking the Woods' overall size. The woods targeted by the project also provide a buffer to the adjacent old-growth forest, providing some degree of protection during severe windstorms, in addition to potentially providing a beautiful backdrop to the expansion project.

The project's restoration of currently ecologically degraded sites provides helpful mitigation by rehabilitating and replanting what are now a dump site and a maintenance yard, and in time that restoration is expected to provide valuable



buffering for the remaining woods. The draft revised EA does not analyze, however, the impacts during the ensuing decades on species whose members live only a few years and that currently use the deeper woods.

Moreover, in assessing the impacts of the Millennium Project on the cultural landscape, the revised draft EA focuses on the number of older trees removed, but the cultural landscape includes the area's topography as well as the woods, including such features as ridges and ravines. Impacts to those features are not analyzed sufficiently.

An EIS should properly analyze the direct, indirect, and cumulative impacts of the proposed project on the historic Arlington House Woods and their topography, and the effects of removing these topographical features when discussing impacts to the site's historical context.

D. The visual impacts analysis does not assess impacts on the viewshed from the Arlington House Woods managed by the NPS.

We understand that the viewshed study has been updated, to include additional vantage points from Fort Myer along Marshall Drive, and from inside the portion of Arlington House Woods located on the NPS property. The results of the revised viewshed study are not reflected in the revised draft EA.

II. The Millennium Project appears to violate Public Law 107-107.

In addition to being contrary to general NEPA requirements, the preferred alternative seems to violate the express requirement of Section 2863 (h) (2) of Public Law 107-107, which transferred 12 acres of Section 29 from the Arlington House grounds to the DoD for purposes of expanding the Cemetery. It specifically states, "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium *that are designed to meet the contours of Section 29*" (italics added). Congress thus recognized the importance of designing a project that preserves the contours of this natural woodland as a backdrop both to Arlington House and to Arlington National Cemetery.

The Millennium Project as it is currently proposed does not meet this requirement. Specifically, the construction of the loop road would entail cutting into the slopes of a steep ravine and crossing a streambed, which in turn would require land disturbance and infilling that would significantly change the existing topography, and is not quantified in the draft revised EA. According to the EA, "(t)he Millennium project will require significant earthwork," but does not analyze nor quantify where that earthwork occurs on the Arlington House Woods site vs. the former Fort Myer site. Disturbances on the Arlington House Woods site to the extent practicable would be



better shifted to the portion of the Millennium Project site on the Ft. Myer side of the stream, which is already significantly less wooded and whose historic contours have already lost their integrity due to operations at the fort.

In its legislative language that transferred the 12 acres of the Arlington House Woods to DoD, Congress clearly recognized the challenges posed by the site's topography – and directed that cemetery development be respectful of those challenges. Congress appropriately was silent as to how much capacity such development should add to the Cemetery.

III. The Millennium Project may violate the Chesapeake Bay Preservation Act.

The Chesapeake Bay Preservation Act is intended to minimize the impacts that land uses have on the waters that feed into the Chesapeake Bay, the nation's largest estuary, especially storm water runoff and its associated pollution and sediment.

The draft revised EA presents Insufficient information to support its conclusions that the preferred alternative complies with these requirements, or that Alternative F, for example, does not.

Specifically, the analysis of Alternative "F" in the revised draft EA is incomplete, and may include inaccuracies. For example, a conversation with Army Corps staff (Oakes with Connor, April 8, 2013) indicated that Alternative F may in fact comply with the Chesapeake Bay Preservation Act, although the revised draft EA states otherwise. Either way, insufficient analysis is presented in the revised draft EA for members of the public to review and agree or disagree.

The proposals to minimize impacts by narrowing the loop road from 30 feet to 22 feet -- saving a total of 8 trees -- and by adding arched bridges rather than channeling the water through culverts are welcome, but the resulting changes in fact are minimal, and do not address the serious issues raised with the current design.

The mitigation proposal, including storm water management features and some pavement removal related to the Chaffee Place parking lot, would mitigate the impacts of the earlier parking lot project – clearly a positive initiative -- and, does not specifically address storm water management of the current project's impacts.

The preferred Alternative E would cut through the existing mature woods, fill a stream valley, move 100,000 cubic yards of soil, and otherwise radically change the landscape. The revised draft EA does not provide analysis to understand why this is at present ANC's preferred alternative, nor how this approach will comply with the CBPA.



IV. The Corps must complete a full Environmental Impact Statement in order to produce a project design that responds to public comments, minimizes impacts on the site's historic context, and meets the Cemetery's operational criteria.

Many commenters on the first draft EA expressed a preference for Alternative F due to its relatively lighter footprint. NPCA finds many aspects of Alternative F of great interest, and preferable to the other alternatives presented. Given that Alternative F would provide some 2,500 burial sites more than the preferred alternative, the Corps should analyze design changes that would lessen further Alternative F's environmental footprint, while still meeting the operational goals of the project. The 2,500 burial sites that Alternative F would provide appear to provide a margin for design changes that could still meet ANC's operational, capacity, and context preservation goals. Such alternatives should be analyzed in a full Environmental Impact Statement.

V. Conclusion

In reviewing the additional capacity that the Millennium Project would provide the ANC, it's clear that redesigning the Millennium Project to protect the site's ecological values and its historic and ecological context could have a relatively small impact on the longevity of the operations of the cemetery, while significantly lessening the project's impacts on irreplaceable historical, ecological and cultural resources of national significance.

An answer that the Cemetery must continue to expand does not suffice. Under the best-case scenario, the Millennium Project will extend the life of the Cemetery by only a few years. At some point, as the draft revised EA suggests, the Cemetery will reach capacity. We are interested to learn, what is the Army's strategy to identify possible locations for a new national cemetery to honor our veterans that in time will be equal in stature to Arlington? Perhaps the Base Realignment and Closure process will open up possible sites. We note that Rep. James Cooper of Tennessee has encouraged the Army to consider a location in the West, which would allow families in that part of the country to bury their loved ones closer to home, with as much honor as given those buried at Arlington.



Ms. Susan L. Connor
U.S. Army Corps of Engineers
April 15, 2013
Page 8

We appreciate the efforts the Army has made to date to accommodate the conflicting values present in the Millennium Project site, and look forward to continuing to develop solutions that honor our veterans while preserving the historic and natural integrity of the Arlington estate.

Sincerely,

Joy M. Oakes
Senior Regional Director

Edwin L. Fountain
NPCA Mid-Atlantic Leadership Council



PRESERVATION VIRGINIA

10 April 2013

Susan L. Conner
Chief, Environmental Analysis Section
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Ms. Conner:

On behalf of Preservation Virginia, I am writing to you to express our concerns about the Arlington National Cemetery Millennium Project. Thoughtful and thorough planning can meet the dual goals of expanding the Cemetery and protecting and preserving the historic landscape and surviving parts of Arlington Woods.

Twelve acres of the 27 acre Millennium Project are listed on the National Register of Historic Places—a listing that recognizes this nation's most significant historic places. In 2001, Congress transferred those twelve acres of Arlington Woods with the following provisions-- "The Secretary of the Army shall use the transferred property for the development of the in-ground burial sites and columbarium that are designed to meet the contours of Section 29." (Public Law 107-107, Section 2863). By adopting this legislation, Congress recognized the significance of designing a project that would maintain the contours of the natural woodland as the contextual setting for the Arlington House and Arlington National Cemetery.

In reviewing the revised draft Environmental Assessment and other information about the project, Preservation Virginia is seriously concerned with the amount of soil being moved, the footage of retaining walls being constructed, and a road being built across a stream proposed in the preferred alternative. This alternative would seemly irreparably alter the topography of the landscape and run counter to the objectives of Congress.

Further the draft Environmental Assessment has few details associated with Alternative F. This alternative seems to have been rejected despite its having the lightest footprint on the land—preserving Congress's intent—and would provide 2500 burial sites more than the preferred alternative. We are also concerned to hear that the representatives of National Cemetery are announced on 4 April at a National Capital Planning Commission meeting that the design work on the preferred alternative is at 100%. This indicates that the public comment process provided for under NEPA is being ignored. We hope that that was an incorrect statement.

Preservation Virginia respectfully requests that the planning for the Millennium Project follow the provisions of Public Law 107-107 and consider alternative designs that will to meet the contours of the twelve acres of land. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth S. Kostelny".

Elizabeth S. Kostelny
Executive Director

PRESERVATION VIRGINIA