

Arlington National Cemetery Millennium Project

Finding of No Significant Impact Millennium Project, Arlington National Cemetery Arlington, Virginia

Arlington National Cemetery (“ANC”) prepared an Environmental Assessment (“EA”) to assess the potential environmental impacts of the Millennium Project and it is incorporated here by reference. The purpose of the Millennium Project is to extend the longevity of ANC. The design is intended to be a combination of columbaria burials, casket in-ground burials, and cremated in-ground burials. The EA determined that building and site element construction shall be suitable for the environmental setting and complementary to the architectural theme and historical considerations of ANC. ANC is the lead agency for this National Environmental Policy Act of 1969 (“NEPA”) process and the U.S. National Park Service (“NPS”) is a cooperating agency.

Proposed Action

The proposed action includes construction of casket burial sections, in-ground sites for ashes, and both columbarium niche courts and a niche wall. The site would include two assembly areas for service participants including committal service shelters. Building and site element construction shall be suitable for the environmental setting and complement the architectural theme and historic and cultural considerations of Arlington National Cemetery. Supporting facilities would include restrooms, storage areas, water features, waterlines, sanitary sewer, storm drainage, underground electrical and communications/information systems, landscaping, retaining walls, perimeter fencing, vehicle and pedestrian access roads and walks, and security systems. Stream restoration will occur within the existing stream channel to restore the stream to its original floodplain. In addition, stormwater management improvements to include underground stormwater storage and a modified stormwater conveyance system, partially on NPS property, would be implemented near the Chaffee Place parking lot.

Alternatives Evaluated

The alternatives evaluated in detail for this project are the Proposed Action, as described above, and the No-Action Alternative. The Proposed Action is Alternative E as described in the EA. Five additional action alternatives were considered and eliminated from detailed evaluation. Those alternatives were eliminated based on the criteria outlined in Section 3.9 of the EA, including an inability to fully meet the operational intent of the Cemetery or an inability to meet applicable regulatory requirements. Earlier conceptual alternatives were developed but not brought forward for consideration if they were not practical or feasible given the project objectives and constraints. The No-Action Alternative would result in no construction of an expansion project on the Millennium Site. Under this scenario, even with other proposed

Arlington National Cemetery Millennium Project

expansion projects at ANC, the longevity of ANC as an active Cemetery would be shortened compared with the Proposed Action.

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. In addition, because the design has continued to evolve, the final project graphics as well as exact number of burials and trees removed will likely differ slightly from those reflected in the EA. The design as of April 2013 includes the deletion of the middle columbarium. This change will not alter the environmental analyses and conclusion that no significant impacts are anticipated. The area where the columbarium was previously located will now be reforested adding additional green space to the overall project. This change would result in beneficial impacts to vegetation and soils and no additional significant adverse impacts.

Analysis

The EA systematically reviewed the nature of the Proposed Action and associated risks, issues, and potential adverse effects on the area evaluated. All feasible measures were incorporated to minimize and avoid impacts to cultural and natural resources.

Short-term impacts associated with the Proposed Action include land use, topography, drainage, and surface water impacts, disturbance of soil and removal of vegetation, air and noise emissions, increased construction traffic, temporary closures or interruptions in the jogging path on Joint Base Myer-Henderson Hall near the construction site, and altered aesthetics from the presence of a construction site. Short-term impacts to utilities such as water and electric service may also be encountered during construction. Short-term impacts would cease with the completion of construction. Long-term impacts to land use, soils, topography and drainage, surface water, vegetation, wildlife, and aesthetics would be expected as a result of the Proposed Action. The proposed action would result in both positive and negative impacts; however, based on the threshold of significance established for each resource area in the environmental assessment, no significant impacts are anticipated. Nevertheless, the process used to develop the Proposed Action has ensured that the negative impacts are avoided, minimized and mitigated to the maximum extent practicable.

In addition to the short and long-term impacts to each resource area, the EA considered the total impacts to the project area from a holistic project perspective and a broader cumulative impacts perspective. Impacts to the natural, cultural and historic resources both on the project site and associated with the project site were reviewed and considered. The impacts of this proposed

Arlington National Cemetery Millennium Project

action in association with other projects both internal to ANC and on a regional scale were considered as part of the cumulative impacts analysis. This review led to a conclusion that the cumulative impacts of the proposed action are not anticipated to be significant.

As part of the proposed action, the existing stream channels, which are currently severely degraded in most areas, would be restored and integrated into the overall project as a natural landscape amenity. Natural channel design techniques would be utilized to restore the existing channels. By establishing stable channel geometry and reestablishing a floodplain connection, excessive bank and bed erosion can be arrested, in-stream habitat improved, and the downstream transport of pollutants reduced.

Many comments concerning the loss of trees were received during the public process discussed in the following section. Although each public comment was carefully reviewed and analyzed, the comments did not alter the environmental analyses and conclusions that no significant impacts are anticipated. Nevertheless, in light of the comments received the following detailed discussion follows.

Approximately 20.7 acres of forest within the original perimeter of ANC are included in the historic property boundary on the National Register of Historic Places (“NRHP”) nomination for Arlington House. Of this, approximately 12.1 acres are under NPS jurisdiction, and 8.6 acres are under ANC jurisdiction. The NPS administered acreage encompasses forested land commonly known as “Arlington Woods.” Adjacent to and falling outside the Millennium Project footprint, the Arlington Woods, which is the oldest section of the NRHP contributing forest, contains trees estimated to be 235 years old; however, none of those trees will be removed by this proposed action. Only one non-native invasive tree would be removed from NPS property. No trees within a NRHP contributing stand on ANC property, comprised of trees estimated to be 165 years old, would be impacted. The trees that would be removed on ANC property are all in areas that were clear cut during the Civil War. About half of the acreage of the five acre 145 year old tree stand, which is NRHP contributing, would be impacted. Thus, the impacted trees are a maximum of 145 years old, but the majority are less than 105 years old and do not contribute to the Arlington House NRHP listing. All impacts to the NRHP contributing forest were disclosed and coordinated through the Section 106 of the National Historic Preservation Act (“NHPA”) process and resultant memorandum of agreement (“MOA”) with the state historic preservation office.

An analysis of the project design indicates that of the 1804 trees (6” diameter and greater) on site, approximately 905 trees would be removed to facilitate construction of the cemetery expansion. Of those 905 trees, 57 are dead, 77 are invasive species, and 771 are healthy native trees. Although the public comments did not alter the environmental analyses and conclusions that the proposed action would result in no significant impacts to forested areas within or near

Arlington National Cemetery Millennium Project

the project footprint, ANC has increased the number of trees being replanted to nearly 800 trees with a caliper of 1 1/2" to 5", plus more than 1,600 tree seedlings, and 14,000 shrubs. As the proposed action proceeds, ANC is committed to further minimize the removal of trees to the maximum extent practical.

Public Process

Early coordination (mid-2000s) with state and federal agencies served to inform the concepts and design of this proposed action. Comments included a desire to protect the forested areas and the stream as well as the need to maintain the architectural theme and historical considerations of ANC. In August of 2012, a scoping update meeting was held at ANC and federal, State, and local organizations were again notified. A draft EA was prepared and released for public and agency review on 6 December 2012. The 45-day public comment period ended on 21 January 2013. All responses to the December 2012 EA comments are found in Appendix F of the June 2013 Final EA. Approximately 30 individuals and organizations submitted comments on the draft EA. The project team revised the initial EA by supplementing it with additional discussion of information providing greater project detail and design refinements to better inform the public. A public open house and site visit to discuss the project was held at ANC on 16 March 2013. The revised EA was released in March 2013 for a 30-day public and agency review. Approximately 100 unique comment letters were submitted in addition to approximately 100 letters containing exactly the same verbatim text, each signed by different private citizens. Although all comments received on the March 2013 EA were carefully reviewed and analyzed, these comments did not alter the environmental analyses and conclusions that no significant impacts are anticipated as a result of the project. All comments and responses are provided in Appendix J of the Final EA.

The planning and design of this proposed action have been coordinated with multiple organizations including, but not limited to, the NPS, the U.S. Commission of Fine Arts, National Capital Planning Commission, Joint Base Myer-Henderson Hall, Virginia Department of Historic Resources, Virginia Department of Environmental Quality, Virginia Department of Conservation and Recreation, Virginia Department of Forestry and Arlington County. A Section 106 consultation was concluded with an MOA in June 2013 pursuant to the NHPA which resolved, through identification of appropriate mitigation measures, any adverse effects, as defined in the NHPA, noted in the planning and review of the proposed action.

Arlington National Cemetery Millennium Project

Conclusions

The principal conclusion of this EA is that implementing the Proposed Action would not result in significant adverse impacts. Therefore, an Environmental Impact Statement will not be prepared.



David Fedroff, P.E.
Lieutenant Colonel, U.S. Army
Chief, Engineering Directorate

5 JUNE 2013

Date