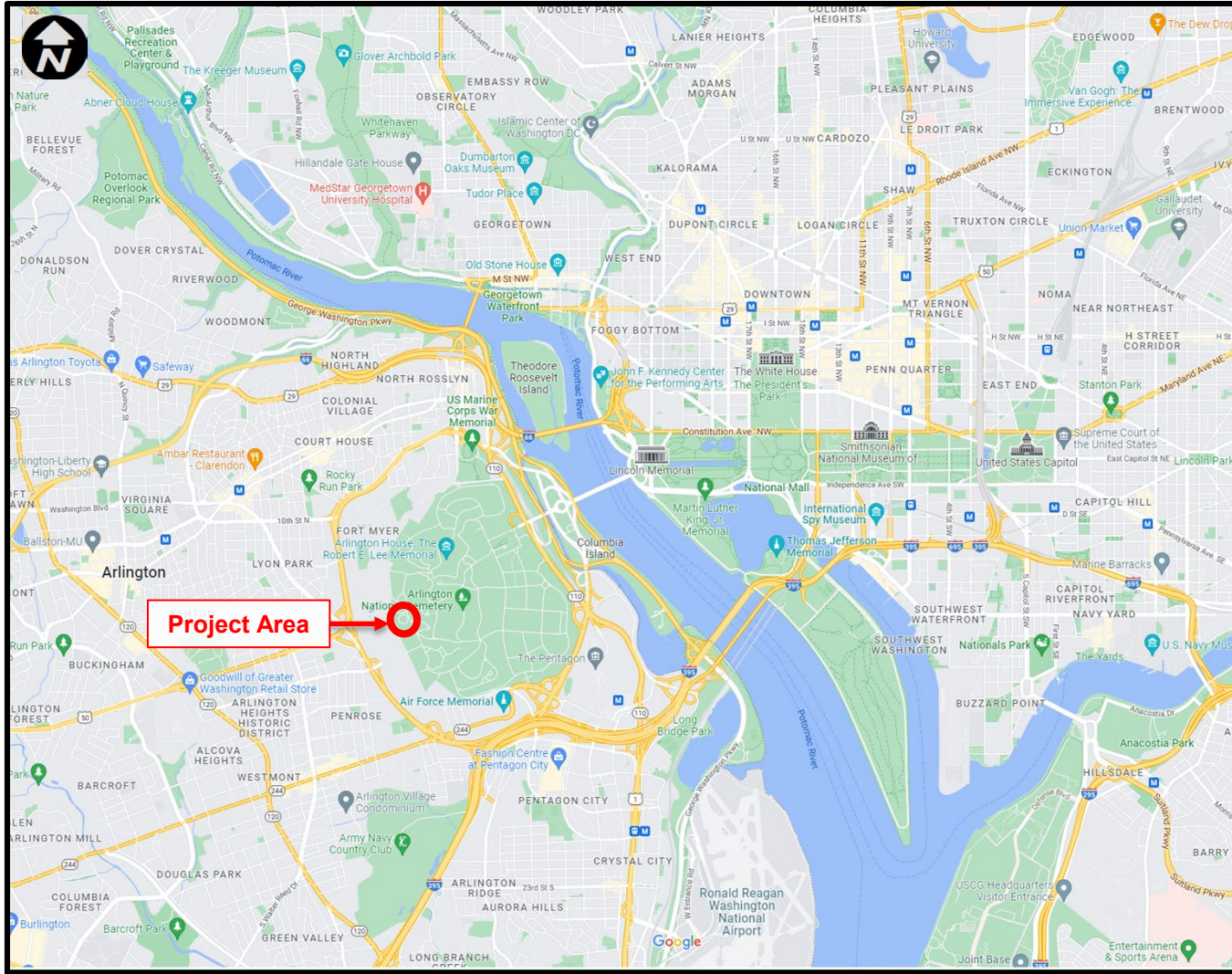




ARLINGTON NATIONAL CEMETERY

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CONFEDERATE MEMORIAL REMOVAL Army National Military Cemeteries Arlington National Cemetery Arlington, Virginia

SECTION 106 PROCESS SUBMISSION: REVISED AREA OF POTENTIAL EFFECT & ASSESSMENT OF ADVERSE EFFECTS

DHR File No. 2022-0201

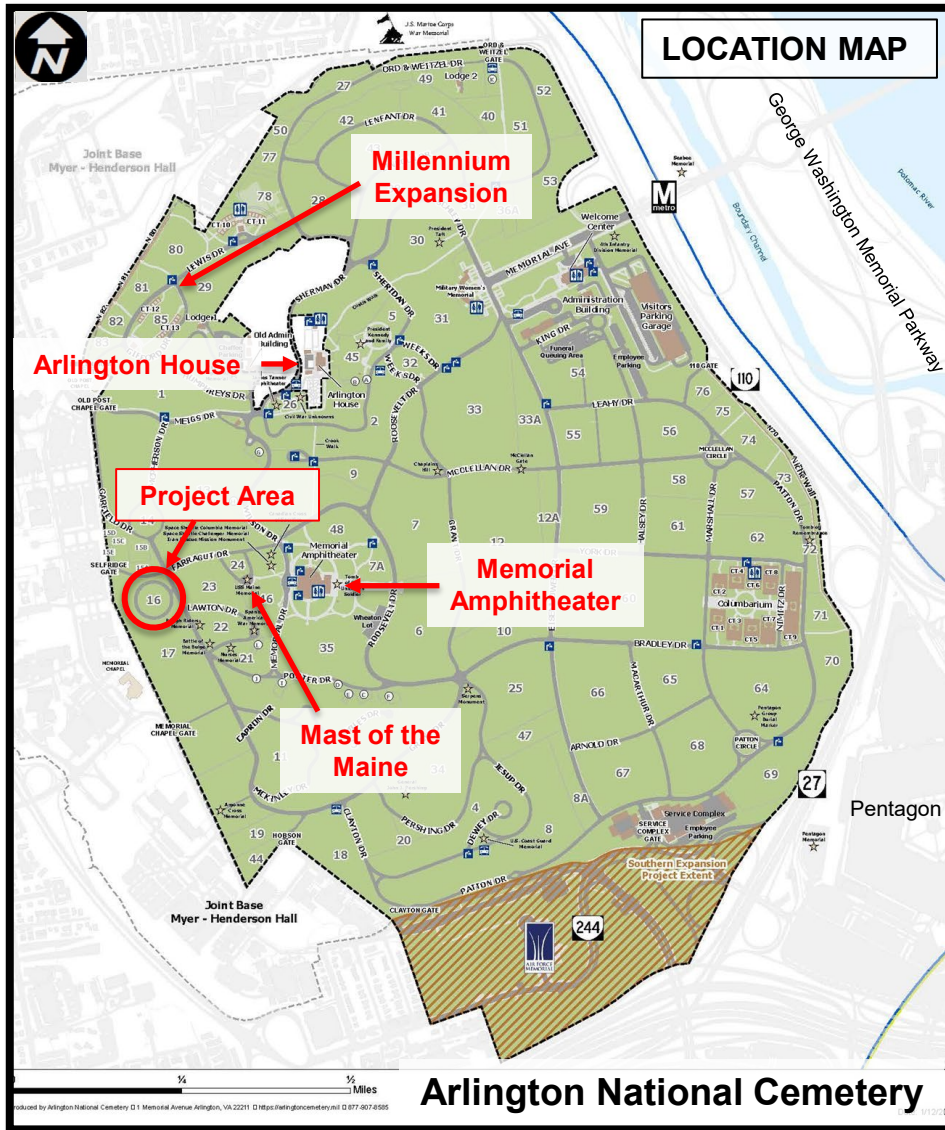
- 1st Submission: February 9, 2023
- 2nd Submission: March 16, 2023
- 3rd Submission: September 29, 2023
- 4th Submission: November 2, 2023



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LOCATION MAP & PROJECT DESCRIPTION



Army National Military Cemeteries (ANMC) proposes the removal of the bronze elements of the Confederate Memorial, which currently sit on a granite base in the center of Section 16 of Arlington National Cemetery. The proposed project is considered a federal undertaking with the potential to cause adverse effects on historic properties pursuant to 36 CFR 800.3(a).

As required by Congress and implemented by the Secretary of Defense, Arlington National Cemetery has been directed to implement the recommendations of the Commission on the Naming of Items of the DoD that Commemorate the Confederate States of America or Any Person Who Served Voluntarily with the Confederate States of America (the Naming Commission). The Naming Commission was established pursuant to Section 370 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021. This undertaking is a direct result of the Secretary of Defense's directive.

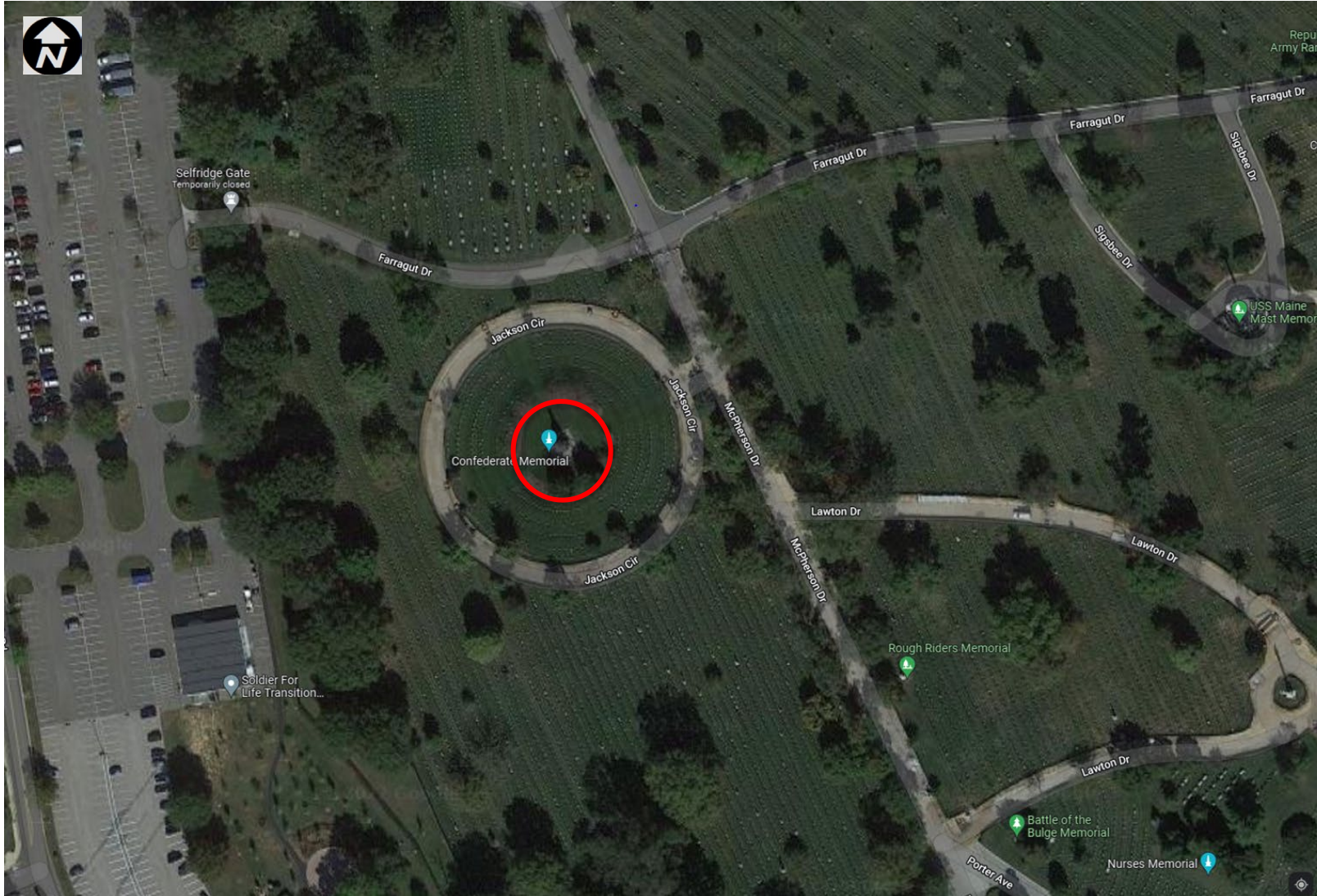
As a result, ANMC expects to carefully deconstruct the Confederate Memorial bronze statue in a deliberate manner, so that it may be securely stored and safeguarded for reassembly. It will be moved to a storage facility pending a final disposition determination. The granite pedestal on which the memorial sits will be left in-situ and will become a possible location for interpretation. ANMC will develop mitigations with input from consulting parties and the public. They will be asked to share their perspectives in order to: 1) Inform determination of the ultimate location for the memorial's bronze elements, once they are removed; and 2) Mitigate possible adverse effects resulting from removal of the memorial from ANC.



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PROJECT NARRATIVE



In 2022, the Historic American Buildings Survey (HABS) completed archival record of the Confederate Memorial, including photos and ortho-imagery generated from a photogrammetric model, which was submitted to the Library of Congress (LoC).

During disassembly, ground disturbance will be minimal. ANMC proposes leaving the granite pedestal in place, and not performing any ground disturbing activities, as the memorial is in the center of burial Section 16.

While the disassembly work occurs, the surrounding landscape, graves, and headstones will be protected. Staging will occur on the circular drive that surrounds the memorial. During the deconstruction, scaffolding will be erected around the memorial and covered with screening, to protect the surrounding landscape and grave markers and to ensure the safety of visitors in/around the vicinity of the deconstruction.

After disassembly, the memorial will be prepared for transport to a storage facility, and the site and landscaping will be restored. ANMC will develop interpretation for the site with input from consulting parties and the public.

Satellite View of Project Area.
Proposed project location in **RED**.



Per 36 CFR § 800.3, Army National Military Cemeteries (ANMC) initiated the section 106 process for the proposed removal of the Confederate Memorial's bronze elements from Arlington National Cemetery (ANC). The proposed project is considered a Federal undertaking, as defined in 36 CFR § 800.16(y), and is the type of activity that has the potential to cause effects on historic properties pursuant to 36 CFR § 800.3(a).

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

Per 32 CFR § 800.2, ANMC engaged the Advisory Council on Historic Preservation (ACHP) for assistance with the section 106 process. Notification was provided to the ACHP on 16 March 2023 via the Electronic Section 106 Documentation Submittal System (e106) Form, inviting the ACHP to participate in the Section 106 consultative process for the proposed undertaking.

Per 36 CFR § 800.3(c), ANMC continues to involve the public in the section 106 process. After initiating consultation with the DHR, ANMC notified potential consulting parties and the public of the undertaking via social media, the ANC website, and local news outlets, and invited them to participate in the consultation process. ANMC continues to post information regarding the proposed undertaking to the ANC website. ANMC continues to work in consultation with the DHR on all plans to involve the public and consulting parties in the section 106 process.



In the initial submission on 09 February 2023, ANMC requested that the DHR:

1. Assign a DHR file number to project
2. Respond to ANMC's request for review of finding that there is an undertaking that affects a historic property: the Confederate Memorial
3. Respond to ANMC's request for review of determination of eligibility

This submission to the DHR included a VCRIS Intensive Survey (Evaluation/Phase II survey) for the Confederate Memorial (DHR ID #000-1235).

ANMC noted it developed a Phase II Intensive-Level Survey report for the Confederate Memorial, in support of the VCRIS survey, for preliminary evaluation for determination of National Register eligibility.



ANMC received DHR's letter of 03 March 2023. In response, on March 16, 2023, ANMC provided a revised submission and requested that the DHR:

1. Concur with revisions to the section 106 initiation document for the proposed undertaking, incorporating comments received from the DHR. This included updates to the Area of Potential Effects (APE) and to the list of potential consulting parties.
2. Acknowledge receipt of the Advisory Council on Historic Preservation (ACHP) Electronic Section 106 Documentation Submittal (e106)
3. Acknowledge receipt of the Phase II (Intensive-Level) survey report to evaluate the individual eligibility of the Confederate Memorial to the National Register of Historic Places (NRHP)
4. After review of the Phase II survey report, respond to ANMC's request for review of determination of eligibility for the Confederate Memorial

In a letter dated, August 29, 2023, DHR concurred that the Confederate Memorial is individually eligible for listing in the National Register of Historic Places (NRHP).



In the third submission on 03 October 2023, ANMC provided:

1. A revised APE, in response to comments received from consulting parties and the public during the scoping period and the first consulting parties meeting
2. Assessment of adverse effects

In this fourth submission, ANMC provides:

1. A revised assessment of adverse effects, in response to comments received from consulting parties in relation to the second consulting parties meeting on 18 October 2023

ANMC requests that the DHR:

1. Concur with revisions to the APE
2. Respond to ANMC's finding of:
 - a) No adverse effects to the Fort Myer historic district
 - b) Adverse effects to the Confederate Memorial, Arlington National Cemetery Historic District, and Arlington House Historic District



During the public scoping period, from August 4 – September 3, 2023, ANMC received comments regarding the previously established APE. The following are representative of the comments received:

- ...it's area of actual Area of Potential Effect; and potential effect is far beyond Jackson Circle and Section 16, but outwards to all of Arlington. The Historical significance origin story of Arlington House and how the it became the nation's truly National Military cemetery is encapsulated in it. And, the memorial's reach is really all across America and across the world, given the reverence and prominence we have bestowed on it. Without this memorial, there is no reason why Arlington is anything special. With it, Arlington says to the world what we can [aspire] to...Arlington Cemetery has a unique place in the American psyche and is essential to our national morale
- ...the removal of this monument will adversely the atmosphere and solemn of the cemetery...
- ...The correct area of potential effect would be a direct effect on the monument, both direct (as the monument is part of Arlington Cemetery's landscape and specifically the Confederate section) and indirect in the visual of the cemetery...
- ...This obviously will have an adverse effect on the historic properties and the entire Northern Virginia community...
- ...I'm not quite sure what message the military is trying to send to the inhabitants of Virginia by removing a cultural, respective piece of our resilience...



During the public scoping period, from August 4 – September 3, 2023, ANMC received comments regarding the previously established APE. The following are representative of the comments received:

- ...this memorial clearly qualifies for National Register status, and its area of effect is all of Arlington, and really all of America, because of Arlington's unique position in the American psyche, and is essential to our national morale. It has a unique and unmitigable impact on our culture...
- ...This Reconciliation Memorial is a part of the culture not only of America but the world. To say that the effect is limited to a small part of a cemetery is disingenuous. This Memorial is eligible to be a contributing object of its own historical significance in Arlington National Cemetery, which is a National Register Historic District which is the only National Military Cemetery with that designation. Former Secretary of the Navy Jim Webb's recent Op Ed in the Wall Street Journal shows how the memorial is a testament to how to re-unify a nation after a civil war. He used it with officials in Vietnam. If America cannot accept its own reconciliation, how can we promote it to other war torn cultures. The APE, as proposed, is just a small area inside the cemetery. This ignores the importance of the reconciliation message that America set by example for the world after our own bloody fratricidal war...
- ...The scope ANC is TOO SMALL, for the EIS, by much, because this "Reconciliation" monument is part of a larger schematic of objects supporting the re-unification of the United States after the War (1861-1865.)...



During the public scoping period, from August 4 – September 3, 2023, ANMC received comments regarding the previously established APE. The following are representative of the comments received:

- ...This memorial is part of the Washington Monumental Corridor Master Plan. The Monumental Corridor was part of the “American Renaissance” and North-South linkage promoted by renowned architects McMillan and Olmstead. They envisioned a “city beautiful” plan for Washington, DC that extended over the Potomac River into Virginia to Arlington House and the Cemetery. The bridge was to become a symbolic link between North and South from DC to Arlington and the addition of George Washington Memorial Parkway, punctuated with monuments and memorial evidenced this American Renaissance and to demonstrate to the world American unification. This beaux arts style memorial, is the most significant monumental artwork at Arlington is part of the American Renaissance which ignited in monumental art around the country., and as such is individually eligible for inclusion on the National Register. The entire Monumental Corridor, the Viewshed from Mount Vernon through to the Capitol must be included in the APE as they are part of the master plan and significant in the [north-south] reunification and the American Renaissance. The entire viewshed of the Washington Monumental core Master Plan [must] be included...



During the public scoping period, from August 4 – September 3, 2023, ANMC received comments regarding the previously established APE. The following are representative of the comments received:

- ...The Memorial Site has significance to Canada and other nations, and is eligible to be a UNSECO World Heritage Site. One of the graves in the plot marked by the memorial is of a Canadian citizen Jerry Cronan was killed at the Battle of Spotsylvania. There were many more citizens of other nations who perished in service to one of the states represented on the Memorial. These other nations need to be identified and consulted as they are being impacted as well. Because of its significance in American history, Arlington House and the Arlington National Cemetery are eligible for listing as a UNESCO World Heritage site. I wonder why this has not been done. But listed or not, the impact on the world and peoples of the world must be considered...
- the Memorial site has significance to those buried at it. There are over 500 soldiers and widows buried at the memorial. Some were relocated there from other sections of Arlington, others from POW camps nearby before the Memorial was erected. However, others chose to be buried there undoubtedly because of the new Memorial. Who is speaking for them? How can the government determine views of the dead. No impact study on this can ever be complete as the voices of the people who chose to be interred around the memorial cannot be heard. We shouldn't be messing with these peoples graves...

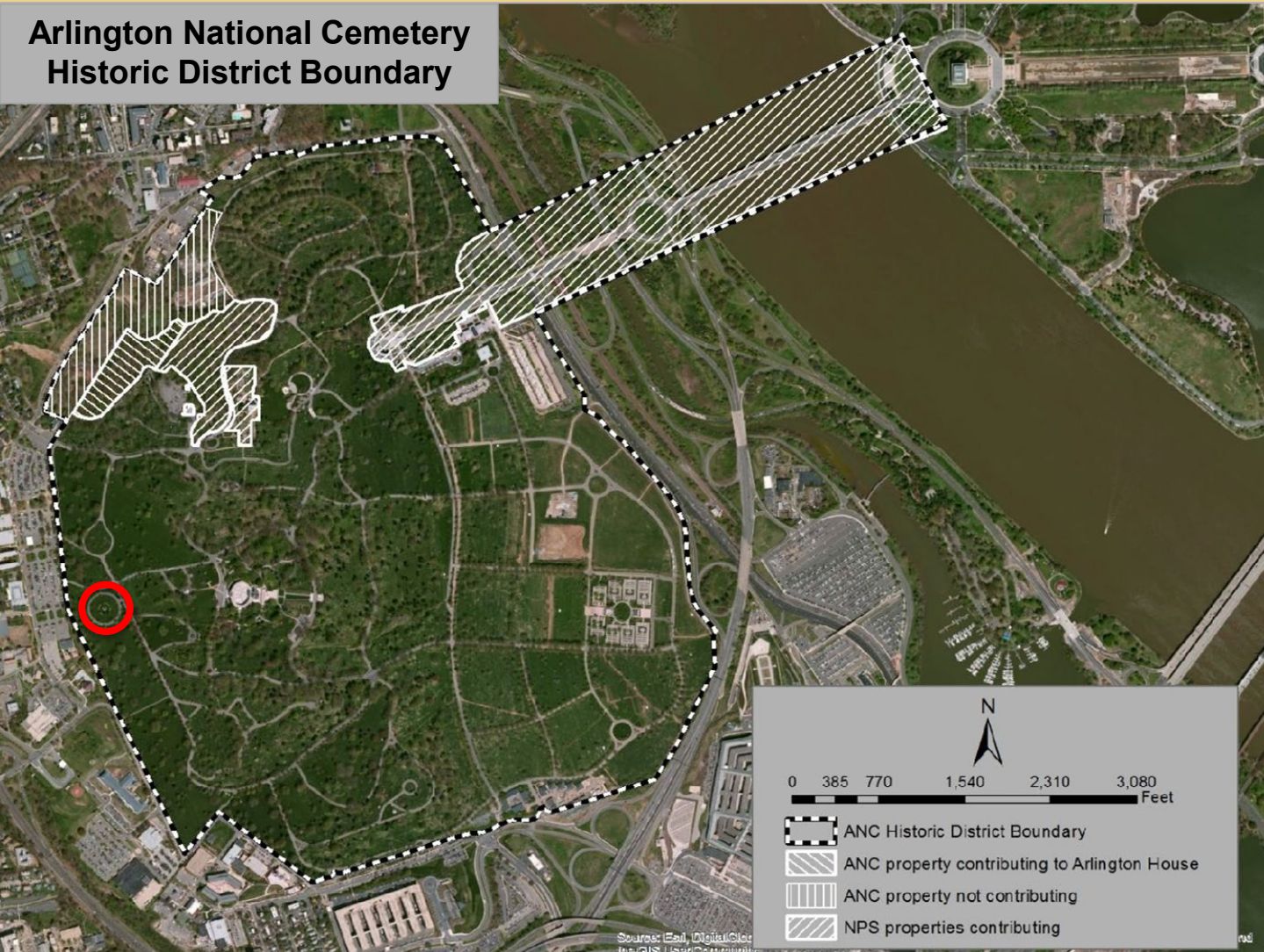


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AREA OF POTENTIAL EFFECT

Arlington National Cemetery
Historic District Boundary



Per 36 CFR § 800.4 & § 800.16, ANMC revised the Area of Potential Effects (APE), the full extent of which will be determined in consultation with the DHR.

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

For this undertaking, the project area is located within the Arlington National Cemetery Historic District (Virginia Department of Historic Resources [VDHR] #000-0042). Most of this work would occur in ANC Section 16, which is approximately 1.22 acres. The work would occur in previously disturbed areas. The project area includes locations where equipment will approach and be placed around the Confederate Memorial during staging, disassembly, removal, and storage operations (see pages 44 – 46 for additional illustrations).

Satellite View of Project Area.
Proposed project location in RED.

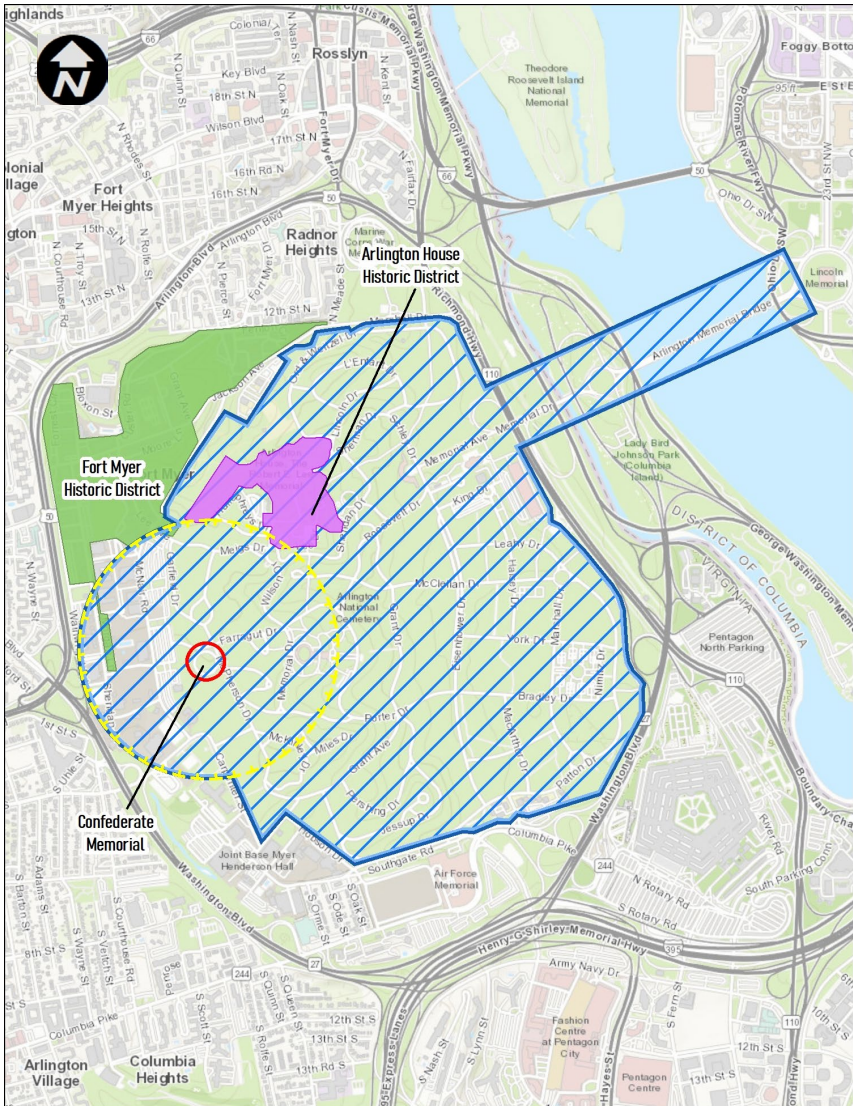
National Register Historic Districts
From ANC's National Register Nomination Form (2014)



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REVISED AREA OF POTENTIAL EFFECT



Comments indicated that the public considered the originally proposed APE too small and narrowly focused. The revised APE is expanded to include the entirety of the Arlington National Cemetery Historic District. Support for this APE is provided below:

- The proposed undertaking would directly affect the Arlington National Cemetery Historic District by removing portions of a contributing resource to the NRHP-listed historic district, which is also an individually eligible resource.
- The removal would change the use and design of one entire section of the cemetery, Section 16.
- The ANC Historic District also contains the Memorial Avenue corridor and the Arlington Memorial Bridge, which is a monument to the sacrifices and valor of our nation's military personnel and a symbolic link between north and south.
- The APE does not expand any further out from the ANC Historic District boundaries and the original viewshed APE. The DHR "Guidelines for Defining the Area of Potential Effects (APE)" recommend considering the scale of the construction in relation to the surrounding setting. The revised APE considers the scale of the removal, its impacts to the surrounding historic districts, long-term visual effects, and short-term construction-related effects.

Map View of Revised APE & Project Area.
APE outlined in **BLUE**.
Viewshed impacts outlined in **YELLOW**.
Proposed project location in **RED**.



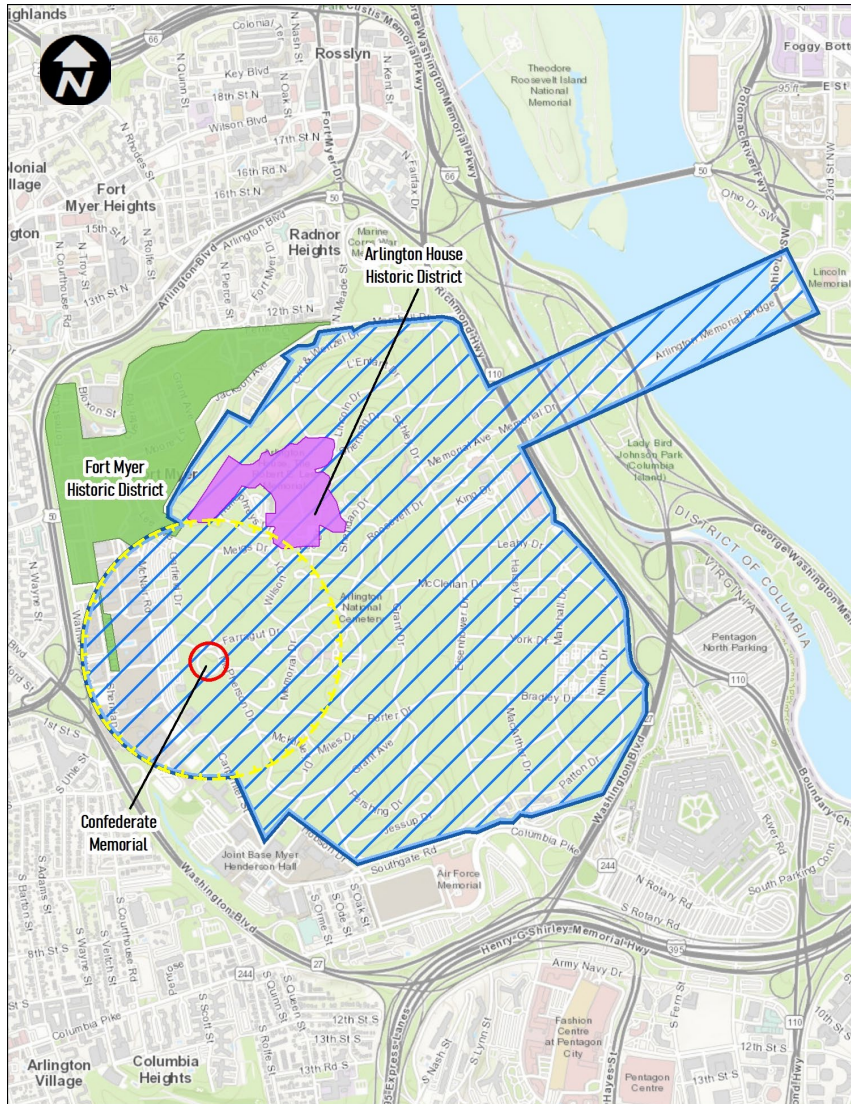
VDHR guidelines recommend that the APE includes:

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

ANMC has determined that the APE should include the ANC Historic District boundaries and the original viewshed APE. This includes all areas that may be directly affected, all areas impacted visually or audibly, and all areas that may result in changes to land use and other similar aspects, like development, public access, traffic patterns, etc. In addition, ANMC does not plan for ground disturbance.

ANMC has determined that other areas of Virginia outside of the proposed APE, plus the Washington Monument Corridor, the entire United States, or any portions of our international community should not be included because the undertaking does not have the potential to cause visible or audible effects in these areas, nor does the undertaking have the potential to change land use or other public use characteristics outside of the Arlington National Cemetery Historic District.

*Map View of Revised APE & Project Area.
APE outlined in **BLUE**.
Viewshed impacts outlined in **YELLOW**.
Proposed project location in **RED**.*



Historic Properties Located Within the APE:

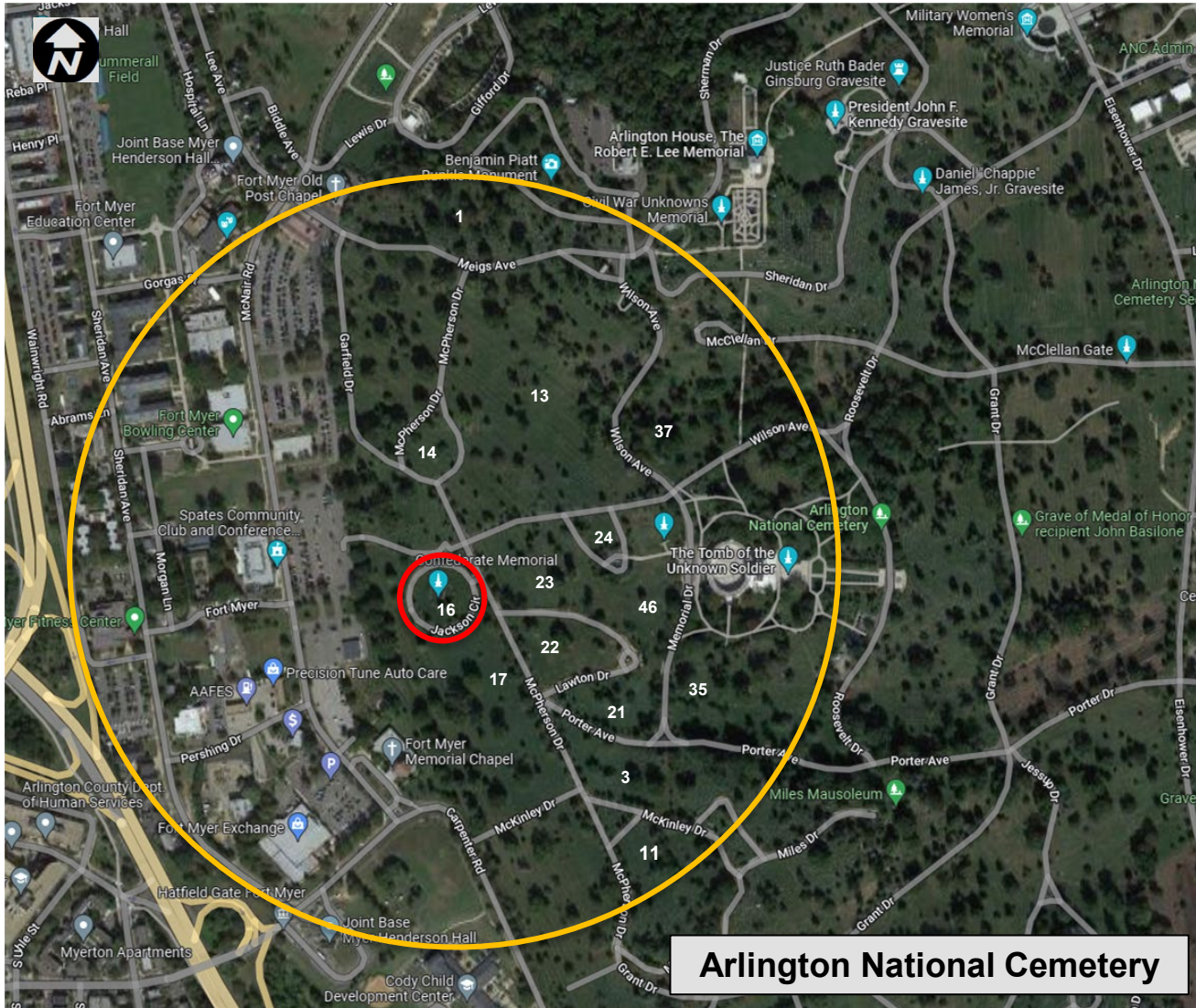
Per 36 CFR § 800.4, the following is a list of historic structures and features contributing to the ANC, Fort Myer, and Arlington House historic districts, which are located within / adjacent to the APE. These properties are identified in the 2014 programmatic agreement among ANC, the Virginia SHPO, and the Advisory Council on Historic Preservation (ACHP), ANC's 2014 National Register nomination, and ANC's 2012 DHR Reconnaissance Level Survey.

- Confederate Memorial (DHR #000-1235 / #000-0042-0029)
- Arlington National Cemetery Historic District (DHR #000-0042)
- Boundary walls and gates (DHR #000-0042-0017)
- Grave Markers (DHR #000-0042-0021)
- Battle of the Bulge Memorial (DHR #000-0042-0025)
- Rough Riders Memorial (DHR #000-0042-0040)
- Spanish-American War Memorial (DHR #000-0042-0043)
- Spanish-American War Nurses Memorial (DHR #000-0042-0044)
- U.S.S. Maine Memorial (DHR #000-0042-0047)
- Arlington House Historic District (DHR #000-0001)
- Arlington House Cultural Landscape (CLI #600049)
- Fort Myer Historic District (DHR #000-0004)

*Map View of Revised APE & Project Area.
 APE outlined in **BLUE**.
 Viewshed impacts outlined in **YELLOW**.
 Proposed project location in **RED**.*



IDENTIFICATION OF HISTORIC PROPERTIES



Viewshed Impacts:

The Confederate Memorial is visible from the following sites:

- Burial sections 1, 3, 11, 13, 14, 16, 17, 21, 22, 23, 24, 35, 37, & 46 (ANC)
- Section 13, white Civil War (enlisted) soldiers' primary burial ground historically referred to as the "Field of the Dead" (ANC)
- Custis Family gravesite (ANC)
- U.S.S. Maine Memorial (Mast of the Maine [ANC])
- Spanish-American War Memorial (ANC)
- Spanish-American War Nurses Memorial (ANC)
- Battle of the Bulge Memorial (ANC)
- Rough Riders Memorial (ANC)
- Selfridge Gate (ANC)
- McNair Rd. (Fort Myer)
- Fort Myer Memorial Chapel (Fort Myer)

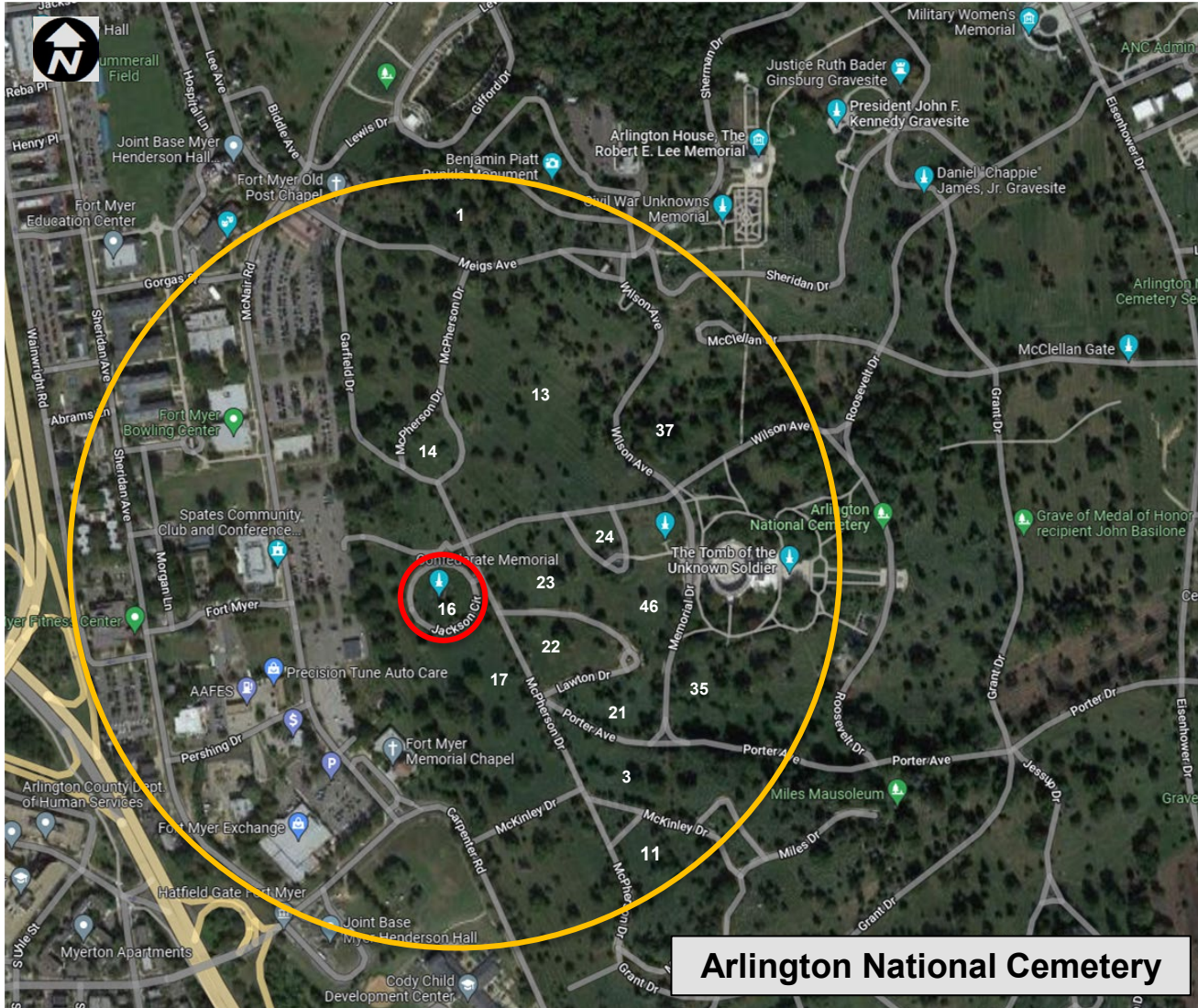
*Satellite View of Project Area.
Viewshed impacts outlined in **YELLOW**.
Proposed project location in **RED**.*



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IDENTIFICATION OF HISTORIC PROPERTIES



Results of Identification & Evaluation: Historic Properties Affected

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

*Satellite View of Project Area.
Viewshed impacts outlined in **YELLOW**.
Proposed project location in **RED**.*



Fort Myer Historic District: Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC has determined that the undertaking—the removal of the bronze elements of the ANC Confederate Memorial—will result in **no adverse effects** on the characteristics that qualify the Fort Myer Historic District for listing in the National Register of Historic Places (NRHP).

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

The proposed removal will not directly affect the Fort Myer Historic District. The undertaking may have temporary impacts to traffic patterns during the staging and transportation phases of the undertaking. No long-term impacts to land use, public access, or traffic patterns are anticipated. In addition, all staging and laydown areas will be within the Arlington National Cemetery Historic District.

There will be no viewshed changes to the Fort Myer Historic District. The Confederate Memorial and the proposed project area is not visible from the historic district. At the Fort Myer property line, views of the memorial are partially obscured by Fort Myer fencing, the ANC boundary wall, and trees and plantings on both sides of the boundary.

The project area is approximately 0.31 miles to the Fort Myer Historic District. Mature trees, other vegetation, buildings, and the boundary fence provide visual obstruction between the two areas in addition to the distance. The Confederate Memorial is partially visible from the Fort Myer Historic District. See photos 4 and 5 on page 28, and photos 18, 19, and 20 on pages 42 and 43, which show the views looking from the Fort Myer Historic District toward the Confederate Memorial.

The district's NRHP nomination notes that the connection between Fort Myer, ANC, and Arlington House, in that in 1861, the United States government expropriated the land now occupied by Fort Myer and the national cemetery from Mrs. Mary Custis Lee, wife of Confederate General Robert E. Lee. While the memorial is a part of the larger legacy and story of the American Civil War and national commemoration, the removal of the memorial does not reach the level of an adverse effect to the Fort Myer Historic District.

There will be no impacts to historic views or vistas to the Fort Myer Historic District. There will be no adverse effects to the integrity of the historic district that would diminish its historical and architectural significance. The district's character and use would not be impacted and therefore it is ANMC's determination that there would be **no adverse effects** to the Fort Myer Historic District.

Links to Fort Myer records:

Fort Myer National Register Historic District documents:
<https://www.dhr.virginia.gov/historic-registers/000-0004/>
<https://www.dhr.virginia.gov/historic-registers/000-0005/>



Arlington House Historic District: Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC has determined that the undertaking—the removal of the bronze elements of the ANC Confederate Memorial—results in **adverse effects** on the characteristics that qualify the Arlington House Historic District and the Arlington House Cultural Landscape for listing in the National Register of Historic Places (NRHP).

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The proposed removal of the ANC Confederate Memorial reduces its ability to convey its significance and impacts its historic integrity.

The undertaking does remove a contributing element to the ANC historic district, which includes the Arlington House Historic District. The NRHP nominations for both districts state that they are representative of themes related to military commemoration, Confederate commemoration, American Civil War history, and the design and development of the monumental core that connects the cities of Arlington, VA, and Washington, DC, and their connection to the McMillan Plan. The 1901 McMillan Plan considered Arlington House a symbol of the Confederate cause, and of the south in general. The Memorial Avenue corridor and the Arlington Memorial Bridge physically and symbolically united nation by joining the Lincoln Memorial on the north side of the Potomac River with Arlington House (the Robert E. Lee Memorial) on the south. The Memorial Bridge and Avenue also connect the nation's capital to Arlington National Cemetery, where thousands who died fighting to preserve democratic government have been laid to rest. The Arlington House NRHP nomination notes that name changes and park designation changes reflect shifting cultural views on Arlington House's place in history and in public notions of commemoration. The same can be said about the removal of the Confederate Memorial.

The Confederate Memorial, Arlington National Cemetery, and the Arlington House site are also associated with the ethnic heritage of the enslaved African Americans who worked and lived within its boundaries, and the larger story of enslavement and the legacy of the American Civil War.

The proposed removal impacts historic views and vistas in the landscape that borders the Arlington House Historic District. The proposed project area is approximately 0.38 miles from the Arlington House Historic District, which is a partially undulating landscape. The Confederate Memorial is not visible from the Arlington House Historic District. See photos 1 and 2 on page 26, and photo 1 on page 34 for a view of the area looking to the Confederate Memorial from locations south of Arlington House.

The undertaking does not impact the integrity of location, workmanship, feeling or associations of the overall Arlington House Historic District in a way that would change Arlington House's status as a National Register Historic District. No direct physical changes will be made to any other area of ANC beyond Section 16. Land use and circulation patterns within the historic district remain unchanged. When the Confederate Memorial is removed, the district will continue to convey its historic significance and retains the many other features that justify its status on the NRHP. The Arlington House Historic District continues to contribute to the nation's understanding of the Custis-Lee landscape, the military-cemetery landscape, politics and government, the Civil War, enslavement, the Lost Cause, and their collective legacies.

Links to Arlington House records:

Arlington House National Register Historic District documents:

<https://www.dhr.virginia.gov/historic-registers/000-0001/>

Arlington House Cultural Landscapes Inventory:

<https://irma.nps.gov/DataStore/Reference/Profile/2184626>



Confederate Memorial: Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC has determined that the undertaking—the removal of the bronze elements of the ANC Confederate Memorial—will result in **adverse effects** on the characteristics that qualify the Confederate Memorial for individual listing in the National Register of Historic Places (NRHP).

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The proposed removal of the ANC Confederate Memorial reduces its ability to convey its significance and impacts its historic integrity.

The undertaking would:

- Impact the historic location and association of the memorial within the ANC historic district.
- Change the historic views and vistas throughout the ANC historic district, especially in and around Section 16, causing permanent and irreversible changes.
- Remove the centerpiece of Section 16, changing the composition, aesthetics, and deviating from the intended design.
- Remove a large physical component of ANC's cultural landscape, altering the site-specific history and symbolism within the ANC historic district.
- Change the character of the memorial, leaving little of the memorial within the original landscape setting that contributes to its historic significance.
- The narrative inscribed on the memorial would no longer function as evidence of the Lost Cause's powerful and long-lasting hold on American culture.
- The ANC Historic District would lose a symbolic, visual illustration of this history, severing part of the interconnected narrative of American military memory embedded throughout the site.

Additionally, the proposed removal process could:

- Potentially result in unintentional damage to this historic resource during deconstruction, storage, and transportation.
- Damage the materials, design, and workmanship (which are qualifying characteristics of the historic property) if the monument is disassembled and not reconstructed.
- Compromise the memorial's safety and security depending on the condition of its future storage location after removal from ANC.
- Expose the memorial's time capsule, which primary source documents indicate is located beneath a granite cornerstone. The time capsule is a contributing element to the memorial.

The limited nature of the undertaking has no adverse effect on the graves in Section 16 or on any archaeological resources in that area. Since the intention of the undertaking is to remove only the bronze elements of the memorial, the granite base would remain in place and would mark the spot where this resource once stood. The headstones, circulation patterns, and horticultural elements of Section 16 will be preserved and unchanged. All construction work in Section 16 will be located in areas of the APE that have already been disturbed. All construction and staging will occur within existing roadways or areas that do not contain burials. Since this project does not currently include ground-disturbing activities, it is not expected that undiscovered cultural resources would be found.

See the Phase II (Intensive-Level) survey report to evaluate the individual eligibility of the Confederate Memorial to the NRHP for additional information.

[Link to Arlington National Cemetery records:](#)

Arlington National Cemetery National Register Historic District documents:
<https://www.dhr.virginia.gov/historic-registers/000-0042/>



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ASSESSMENT OF ADVERSE EFFECTS

Arlington National Cemetery Historic District: Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC has determined that the undertaking—the removal of the bronze elements of the ANC Confederate Memorial—will result in **adverse effects** on the characteristics that qualify the Arlington National Cemetery Historic District for individual listing in the National Register of Historic Places (NRHP).

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The proposed removal of the ANC Confederate Memorial reduces its ability to convey its significance and impacts its historic integrity.

The undertaking will have temporary impacts to traffic patterns during the staging and transportation phases of the undertaking. No long-term impacts to land use, public access, or traffic patterns are anticipated. The cemetery and Section 16 remain a commemorative burial space, however Section 16 will lack a commemorative object to serve as a focal point. The removal immediately impacts historic views and vistas in the cemetery sections surrounding Section 16 and the Confederate memorial. It also removes a contributing element to the ANC historic district.

As noted earlier, the NRHP nominations for both the ANC and Arlington House districts state their significant representation of themes related to military commemoration, landscape architecture, Confederate commemoration, American Civil War history, politics and government, and the design and development of the monumental core that connects Arlington, VA, and Washington, DC. The 1901 McMillan Plan considered Arlington House a symbol of the Confederate cause, and of the south in general. The Memorial Avenue corridor and the Arlington Memorial Bridge physically and symbolically united the nation by joining the Lincoln Memorial with Arlington House. When the Confederate Memorial was completed in 1914, the sponsors invoked similar themes of reconciliation, representative of late 19th- and 20th-century commemorative efforts.

This action does not, however, impact the integrity of location, workmanship, feeling or associations of the overall ANC Historic District in a way that would change ANC's status on the NRHP. No direct physical changes will be made to any other area of ANC beyond Section 16. Headstones and circulation patterns remain unchanged. The cemetery continues to convey its historic significance as a military cemetery, for its landscape architecture and architecture, and provides opportunities to study cultural resources that span the nation's history and represent the diverse stories of the American people.

When the Confederate Memorial's bronze elements are removed, ANC would maintain its standing on the NRHP. The cemetery continues to contribute to the nation's understanding by providing information on the Custis-Lee landscape, the military-cemetery landscape, politics and government, the Civil War, enslavement, the Lost Cause, and their collective legacies. ANMC must continue to facilitate this understanding, through good stewardship and preservation of ANC's historic resources, and through continual outreach and engagement with the American public. Similar to the changes in management occurring at Arlington House, the removal of the Confederate Memorial from the national cemetery reflects shifting cultural views on the place of public memorials and public notions of commemoration. The removal becomes part of the ANC's living history and ongoing period of significance.

Caitlin Smith, AIC PA
Cultural Resources Program Manager
Arlington National Cemetery
Army National Military Cemeteries

[Link to Arlington National Cemetery records:](#)

Arlington National Cemetery National Register Historic District documents:
<https://www.dhr.virginia.gov/historic-registers/000-0042/>



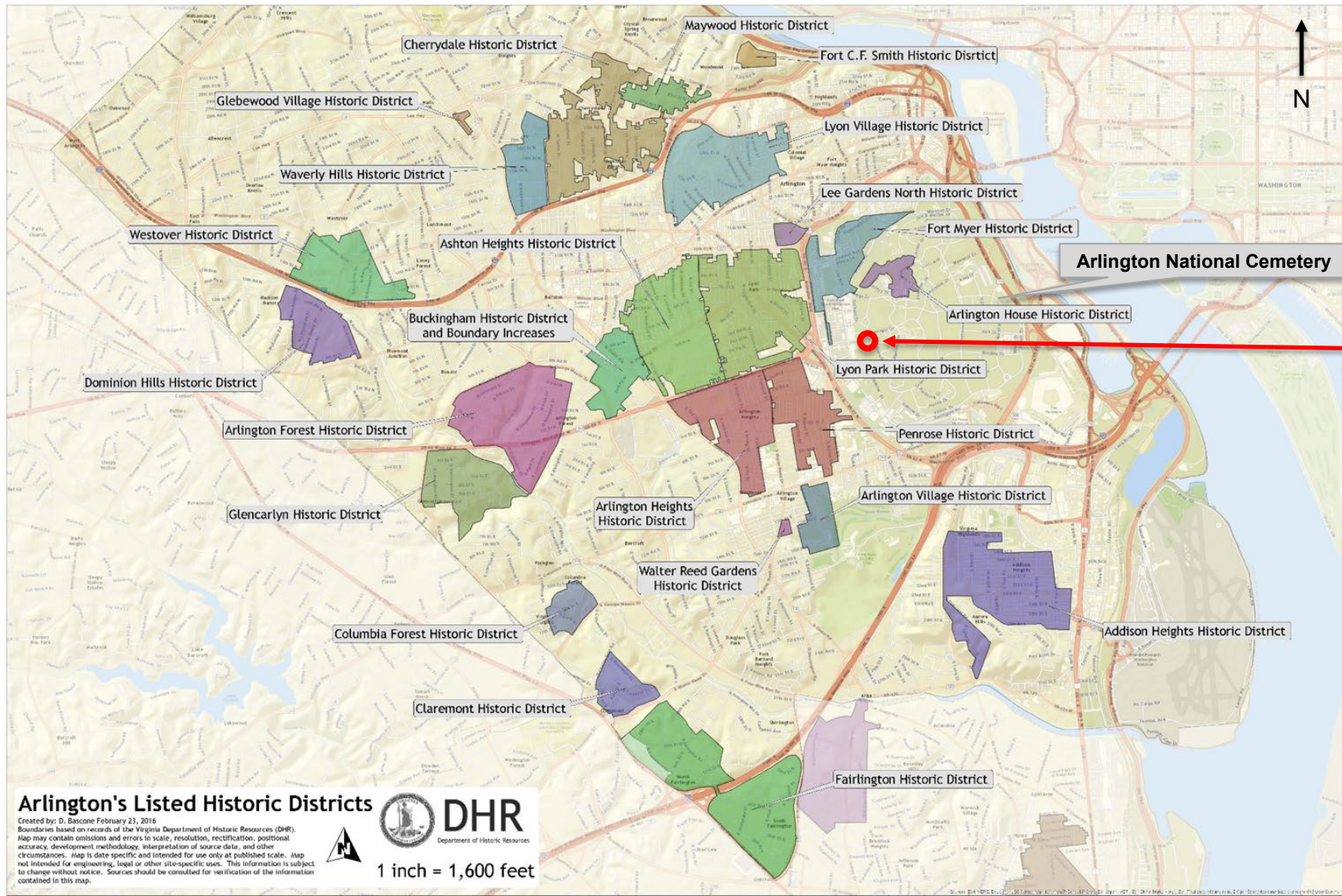
SUPPORTING DOCUMENTATION



ARLINGTON NATIONAL CEMETERY

HONOR • REMEMBER • EXPLORE

ARLINGTON'S LISTED HISTORIC DISTRICTS



Proposed project location in RED.

Arlington's Listed Historic Districts

Created by: D. Bascone February 23, 2016
 Boundaries based on records of the Virginia Department of Historic Resources (DHR).
 Map may contain omissions and errors in scale, resolution, rectification, positional accuracy, development methodology, interpretation of source data, and other circumstances. Map is date specific and intended for use only at published scale. Map not intended for engineering, legal or other site-specific uses. This information is subject to change without notice. Sources should be consulted for verification of the information contained in this map.

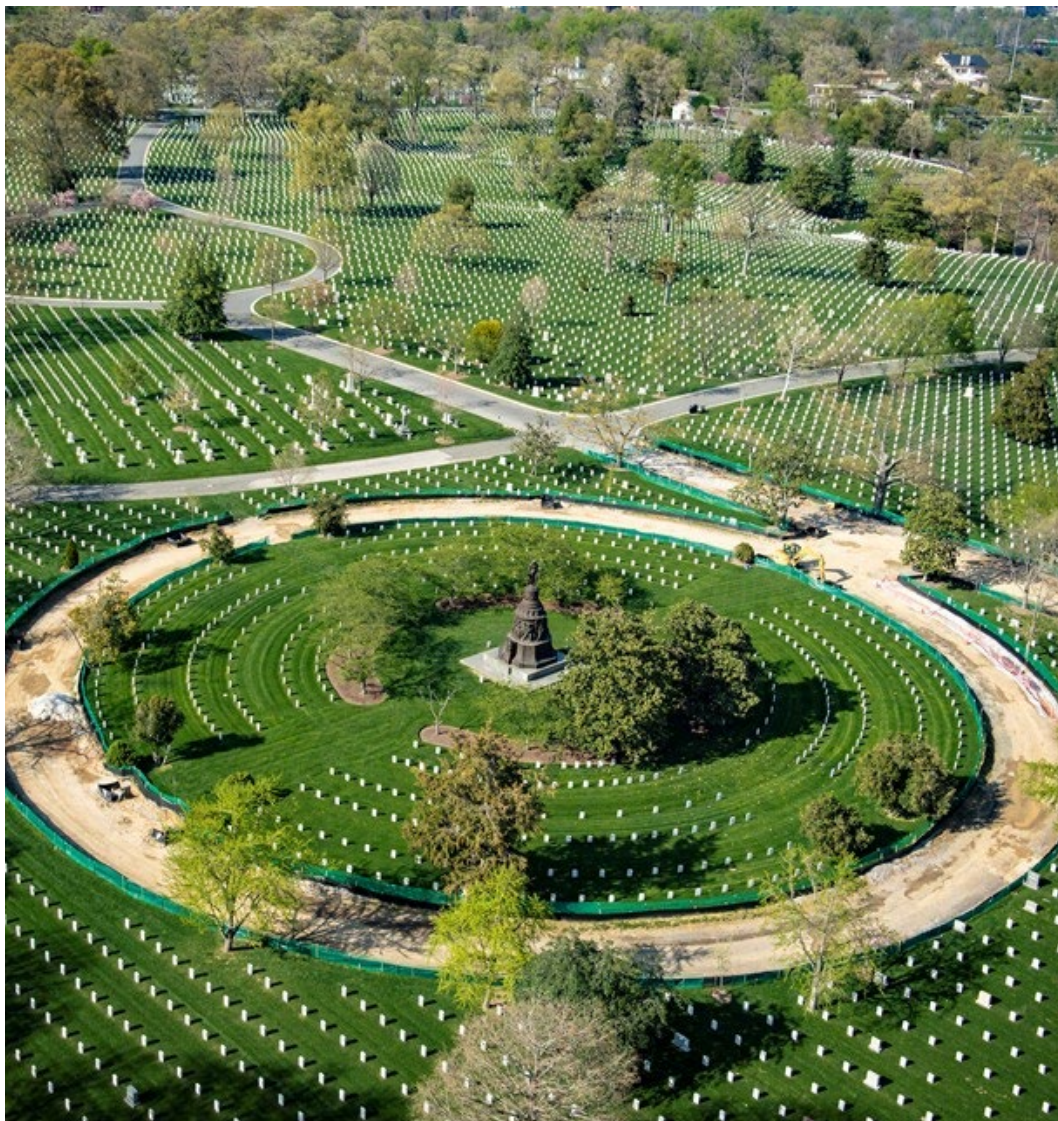
1 inch = 1,600 feet



ARLINGTON NATIONAL CEMETERY

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EXISTING SITE VIEW & DESCRIPTION



*Aerial photography of Section 16
at Arlington National Cemetery,
Arlington, Va., April 20, 2022.*

Site Description:

Section 16 contains the remains of Confederate soldiers, arranged in concentric circles with government furnished headstones facing toward the center of the circle. The Confederate Memorial sits in the center of the circle, with four graves adjacent, one at each face. A circular drive separates the section from the rest of the cemetery.

The memorial stands approximately 33 feet tall and features a 30-foot-tall bronze sculpture atop an approximately 3-foot-tall polished granite base:

- The granite base is composed of two pieces: a 27-foot 8-inches square, with a height of 8-inches, supports a granite plinth that is 20-feet by 18-feet and 26-inches tall.
- Bronze elements taper from 15-feet wide and 6-feet 4-inch-tall base to a 5-feet 5-inch wide and 8-feet 8-inches tall frieze and plinth section, up to a statue on pedestal element.

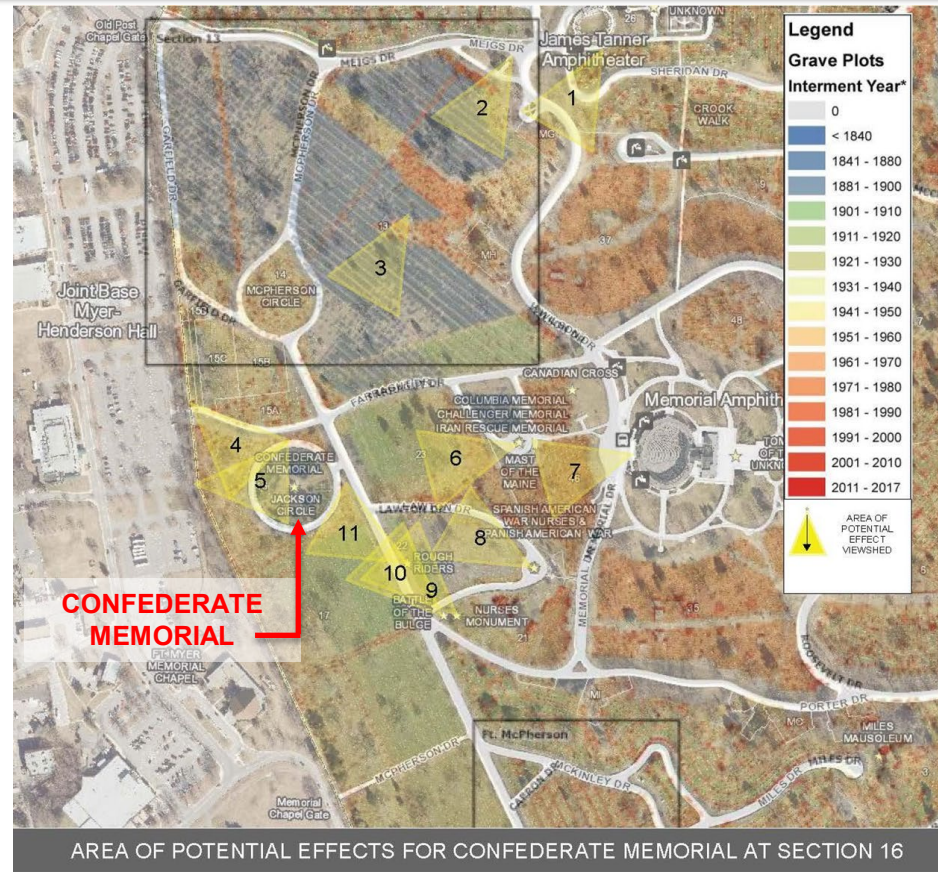
Four Confederate soldiers lie at the base of the Memorial, one on each side: the memorial's sculptor, Moses Ezekiel; Lt. Harry C. Marmaduke of the Confederate Navy; Capt. John M. Hickey of the Second Missouri Infantry; and Brig. Gen. Marcus J. Wright, who commanded brigades at the battles of Shiloh and Chickamauga.



ARLINGTON NATIONAL CEMETERY

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APE VIEWSHEDS: 2022



1. JAMES TANNER AMPHITHEATER, 1873
2. RECEIVING VAULT
3. CUSTIS FAMILY PLOT, 1853
4. SELFRIEDGE GATE, 1958
5. MCNAIR ROAD, JOINT BASE MYER-HENDERSON HALL
6. MAST OF THE MAINE (USS MAINE MEMORIAL), 1912
7. MEMORIAL AMPHITHEATER, 1920
8. SPANISH-AMERICAN WAR MEMORIAL, 1902
9. SPANISH-AMERICAN WAR NURSES MEMORIAL,
10. BATTLE OF THE BULGE MEMORIAL, 2002
11. ROUGH RIDERS MEMORIAL, 1906



1. JAMES TANNER AMPHITHEATER, 1873

1



2. RECEIVING VAULT

2





3. CUSTIS FAMILY PLOT





4. SELFRIDGE GATE, 1958

4



5. MCNAIR ROAD, JOINT BASE MYER-HENDERSON HALL

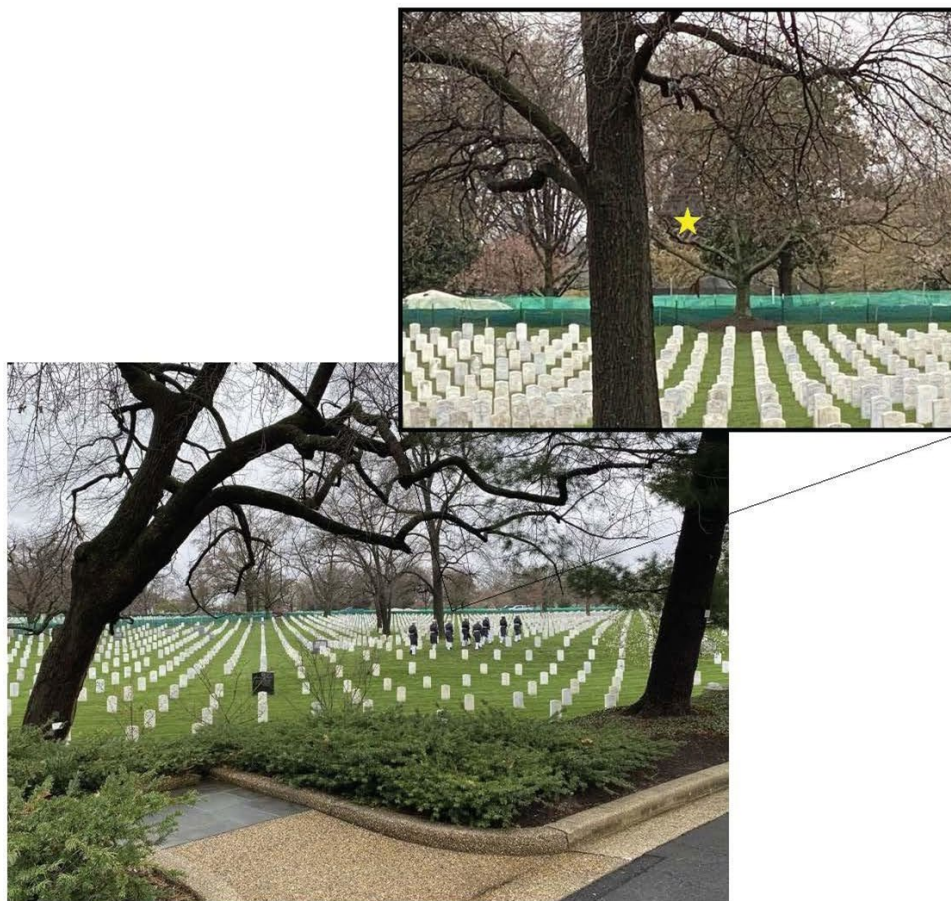
5





6. MAST OF THE MAINE (USS MAINE MEMORIAL), 1912

6





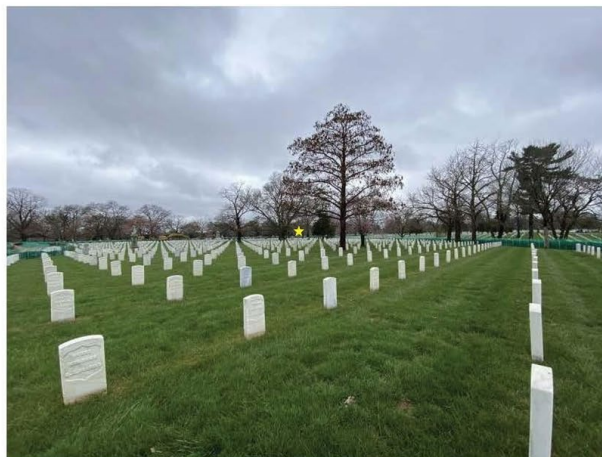
7. MEMORIAL AMPHITHEATER, 1920

7



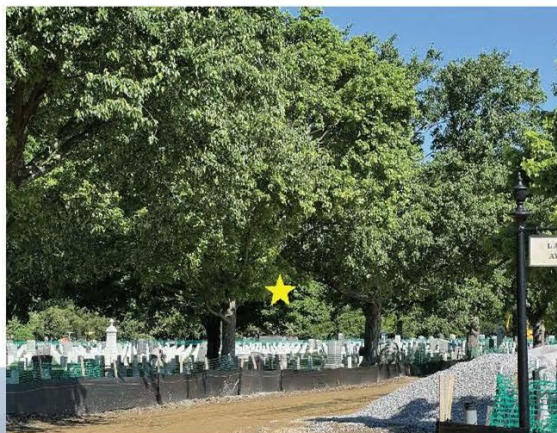
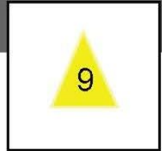
8. SPANISH-AMERICAN WAR MEMORIAL, 1902

8



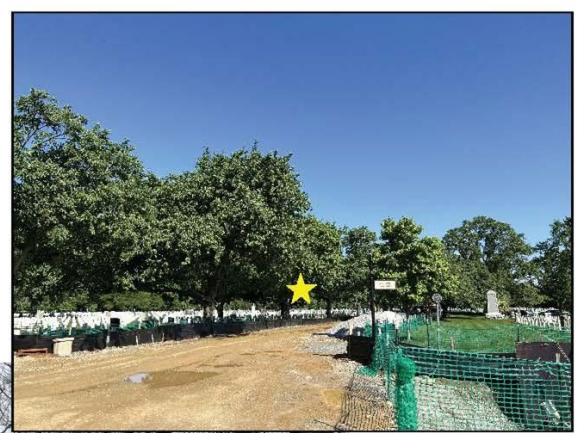
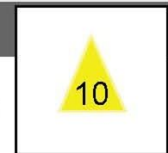


9. SPANISH-AMERICAN WAR NURSES MEMORIAL





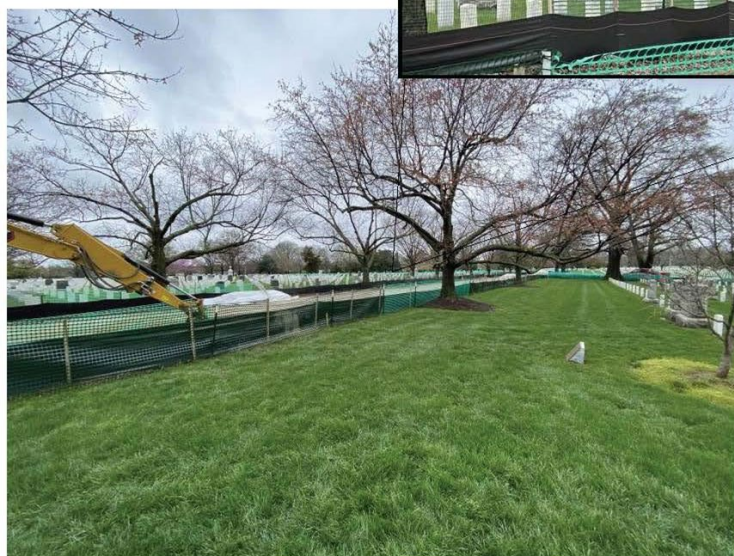
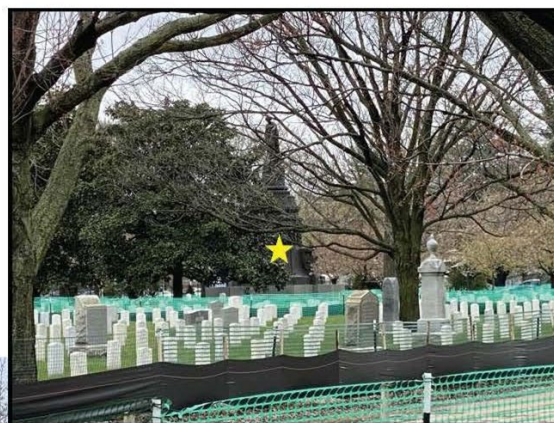
10. BATTLE OF THE BULGE MEMORIAL, 2002





11. ROUGH RIDERS MEMORIAL, 1906

11

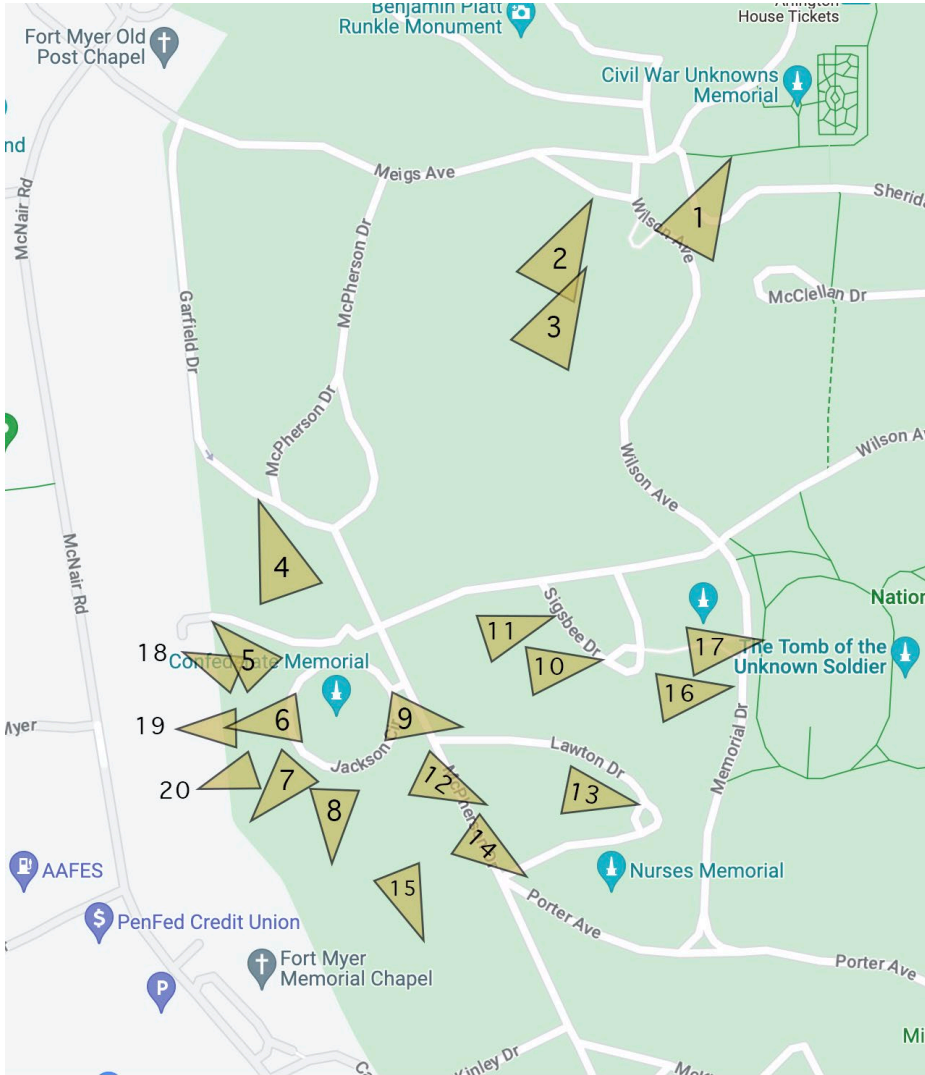




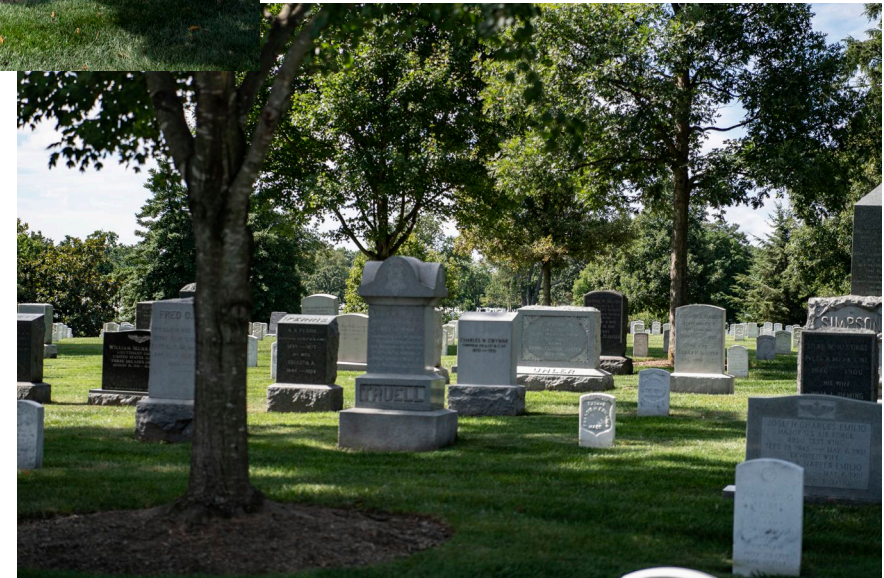
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APE VIEWSHEDS: 2022



View 1: Confederate Memorial not visible



View 2: Confederate Memorial not visible

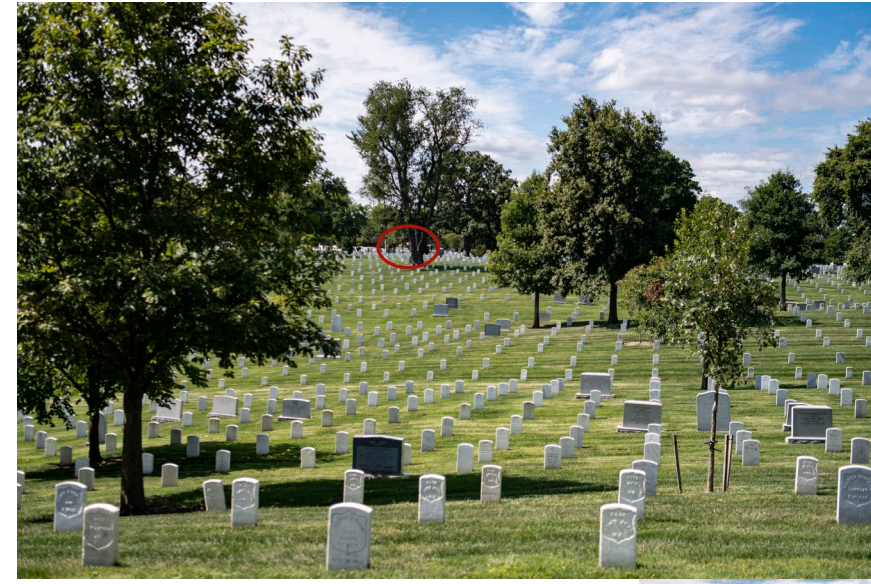
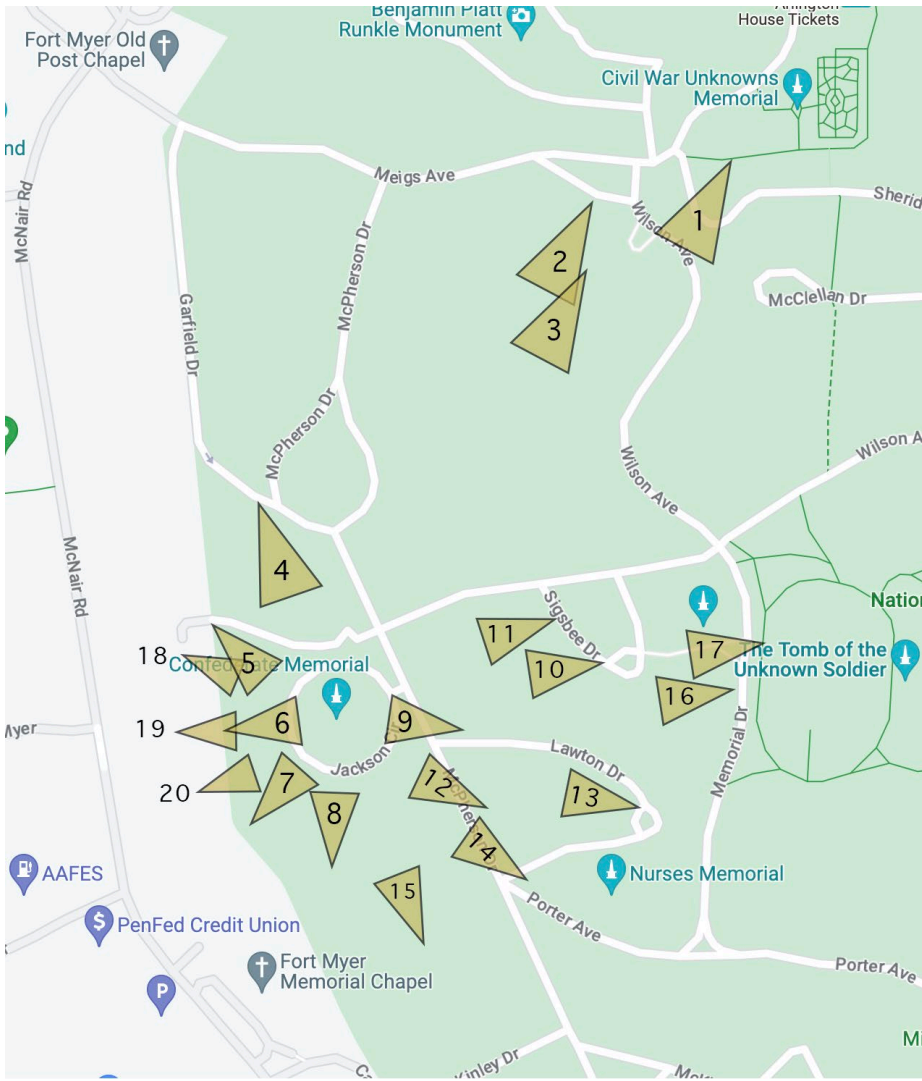
Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



ARLINGTON NATIONAL CEMETERY

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APE VIEWSHEDS: AUGUST 2023



View 3: Confederate Memorial partially visible



View 4: Confederate Memorial partially visible

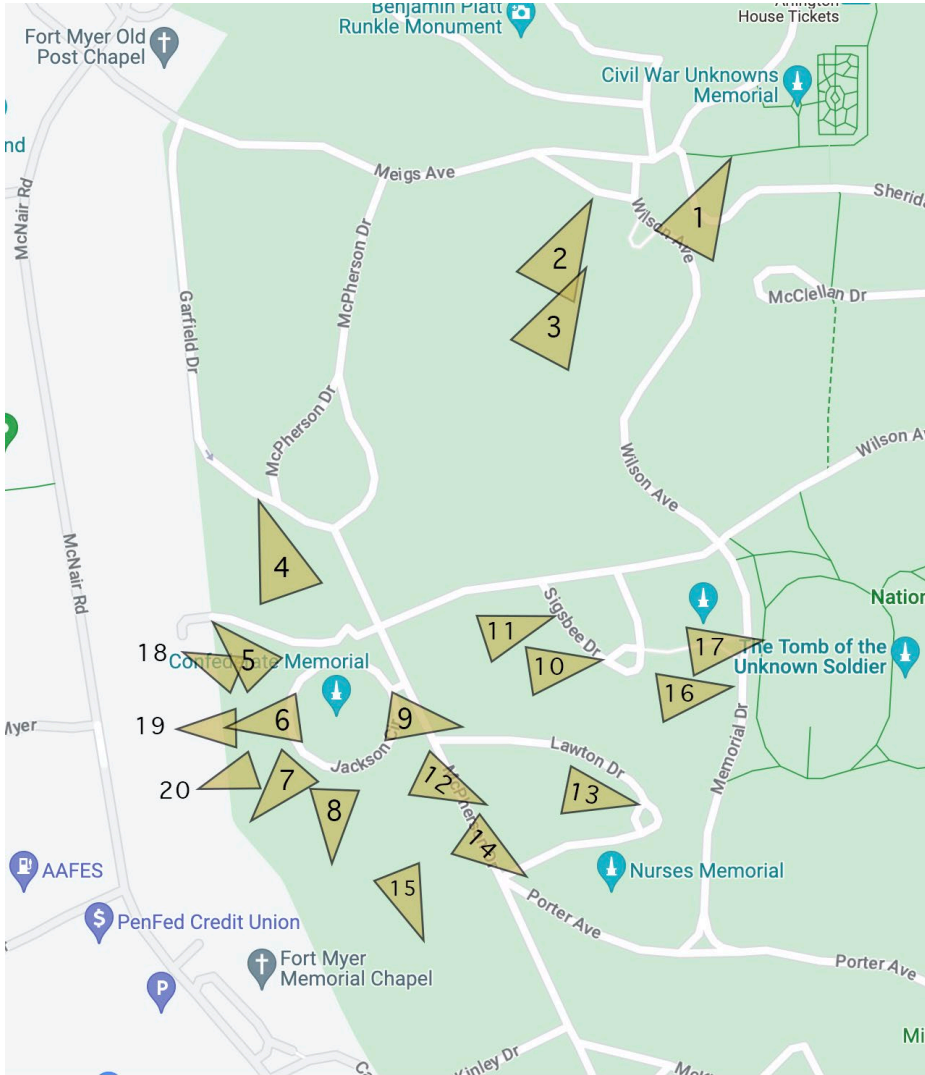
Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



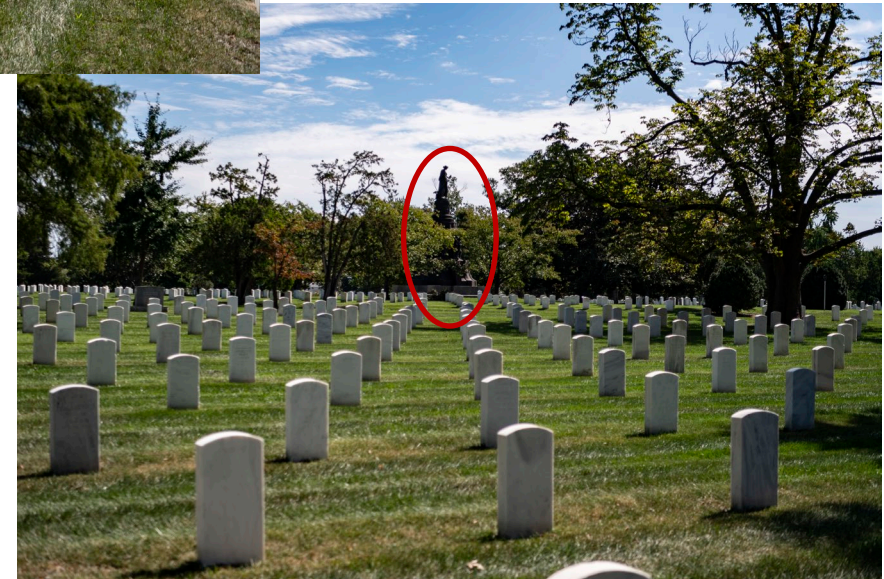
ARLINGTON NATIONAL CEMETERY

HONOR • REMEMBER • EXPLORE

APE VIEWSHEDS: AUGUST 2023



View 5: Confederate Memorial partially visible



View 6: Confederate Memorial partially visible

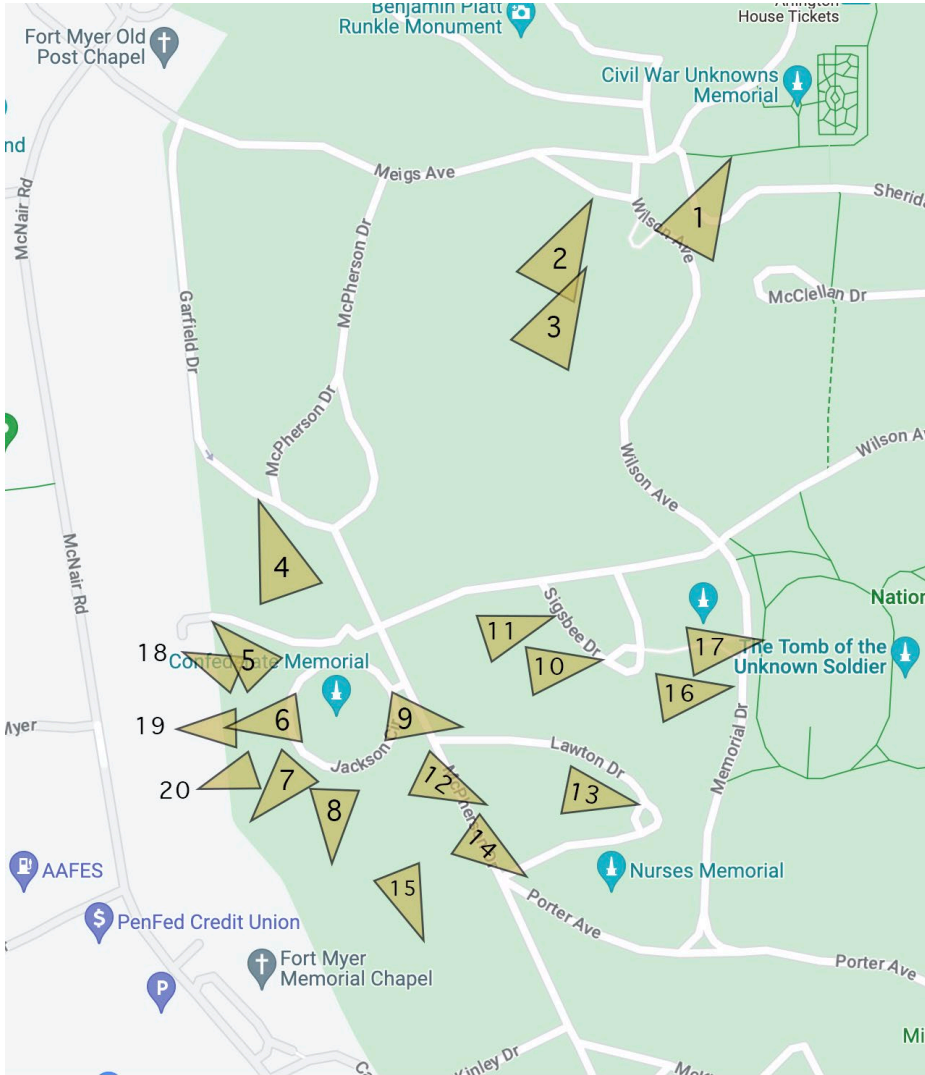
Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



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APE VIEWSHEDS: AUGUST 2023



View 7: Confederate Memorial visible



View 8: Confederate Memorial visible

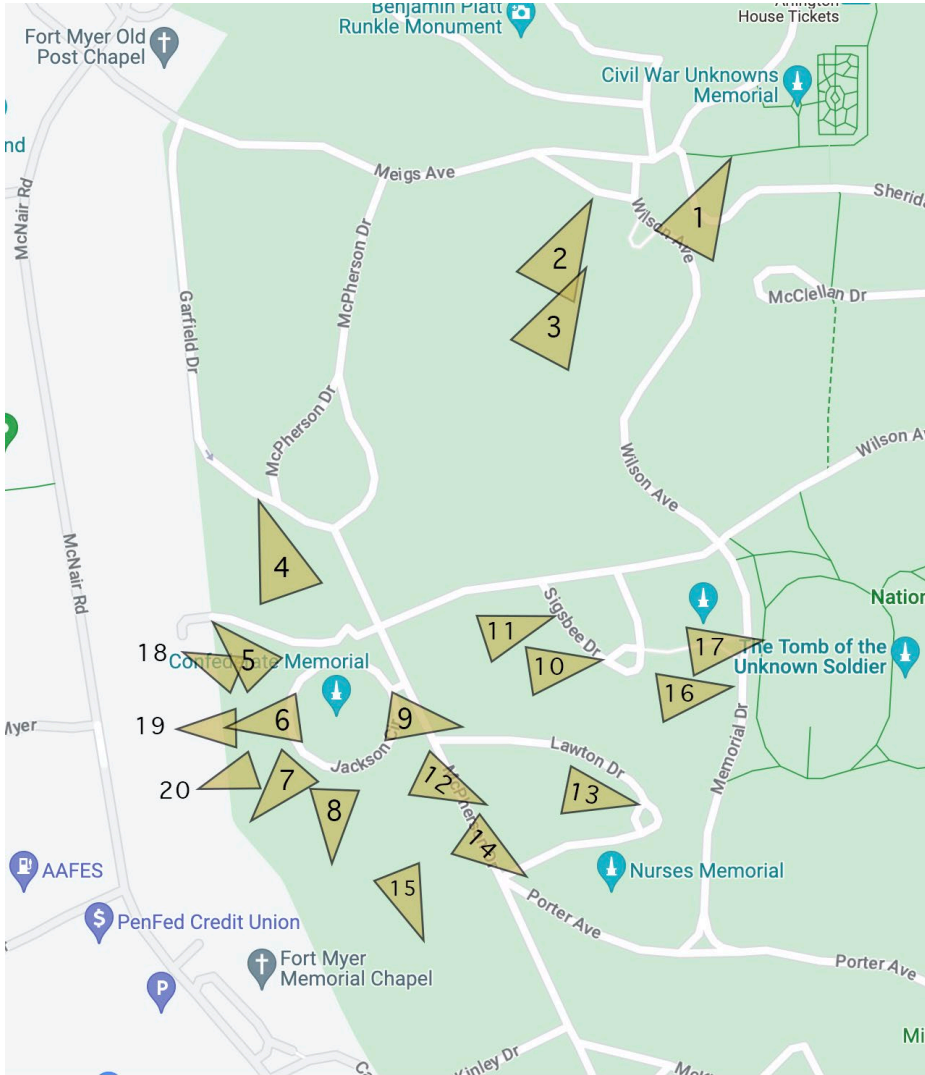
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Angle of photo and photo number in **YELLOW**.



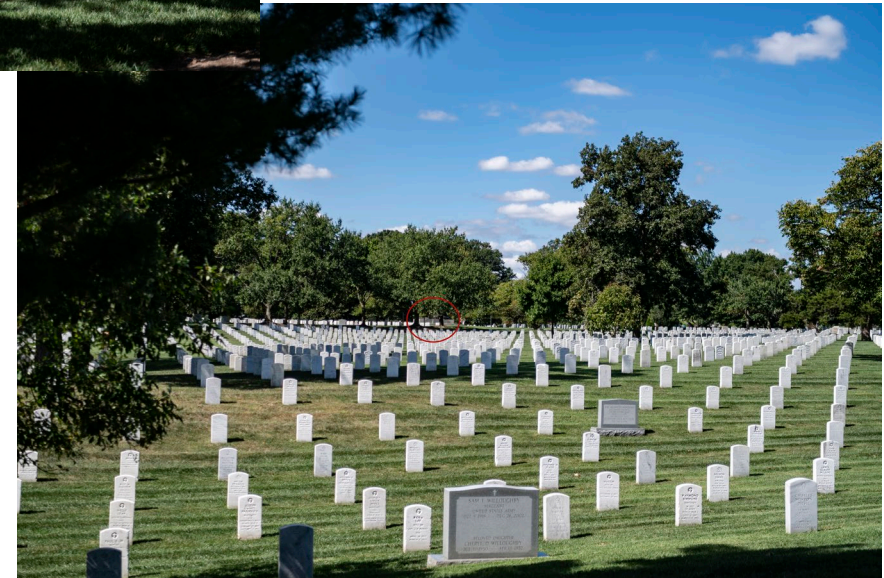
ARLINGTON NATIONAL CEMETERY

HONOR • REMEMBER • EXPLORE

APE VIEWSHEDS: AUGUST 2023



View 9: Confederate Memorial partially visible



View 10: Confederate Memorial partially visible

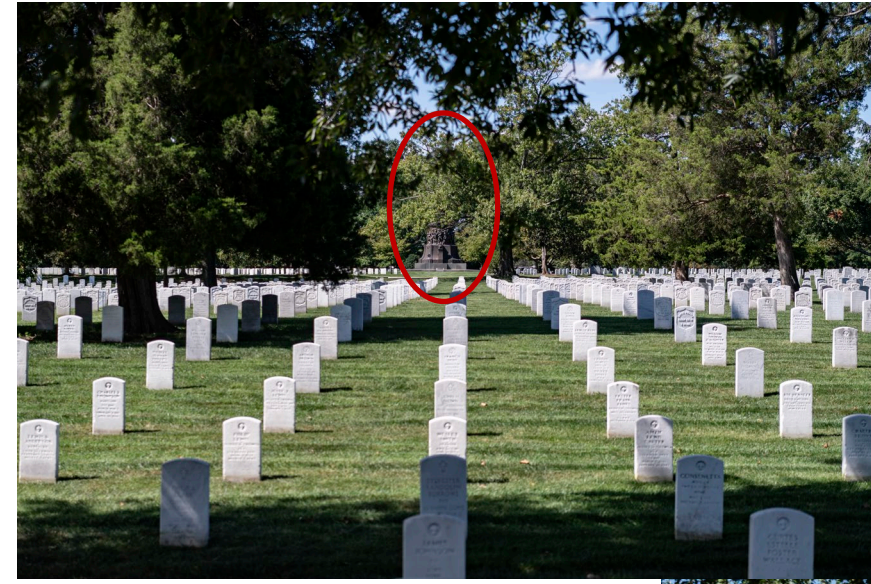
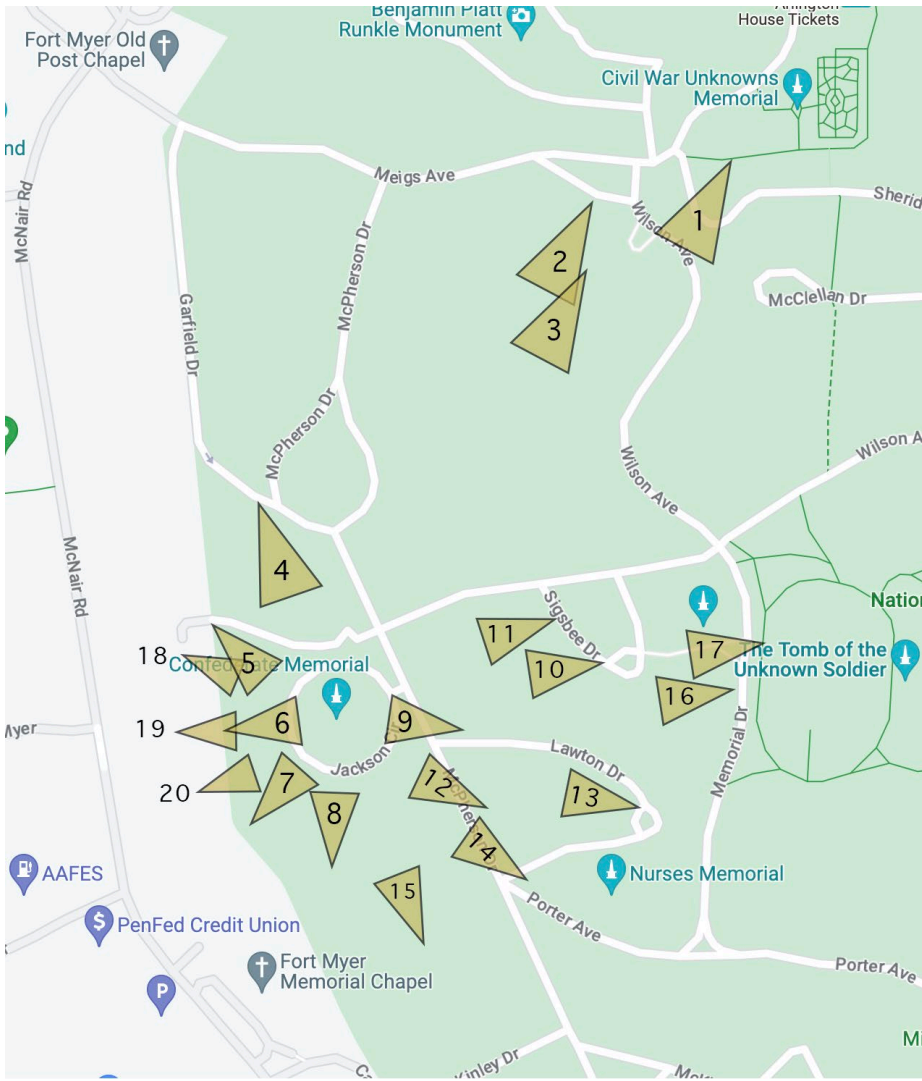
Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



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APE VIEWSHEDS: AUGUST 2023



View 11: Confederate Memorial partially visible



View 12: Confederate Memorial partially visible

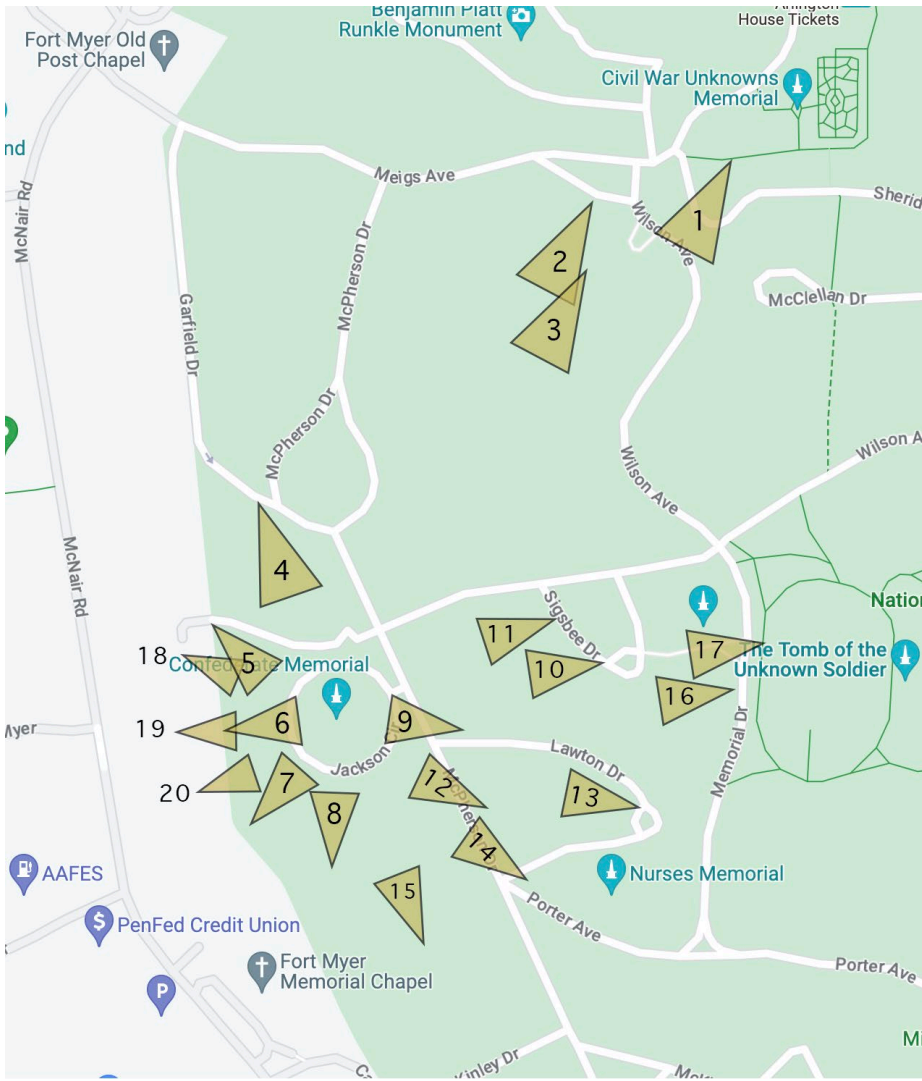
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Angle of photo and photo number in **YELLOW**.



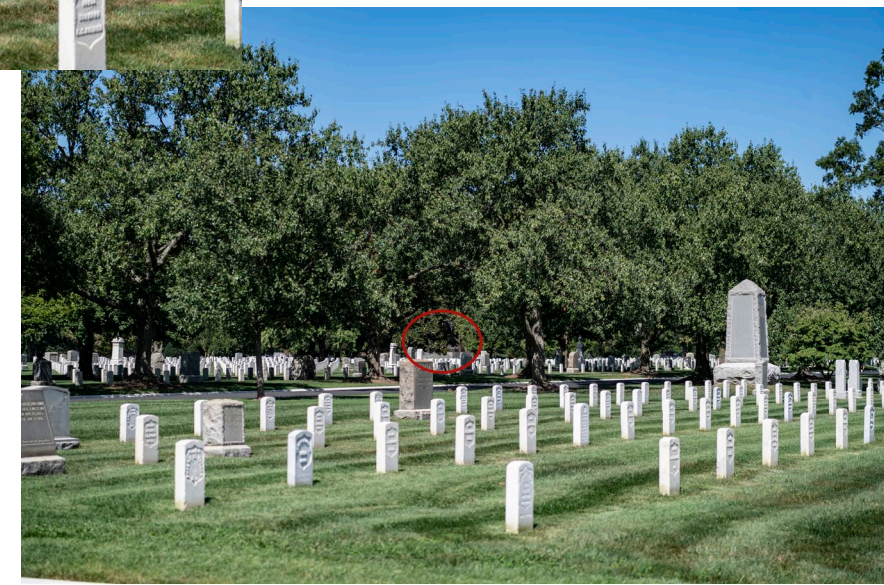
ARLINGTON NATIONAL CEMETERY

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APE VIEWSHEDS: AUGUST 2023



View 13: Confederate Memorial partially visible



View 14: Confederate Memorial partially visible

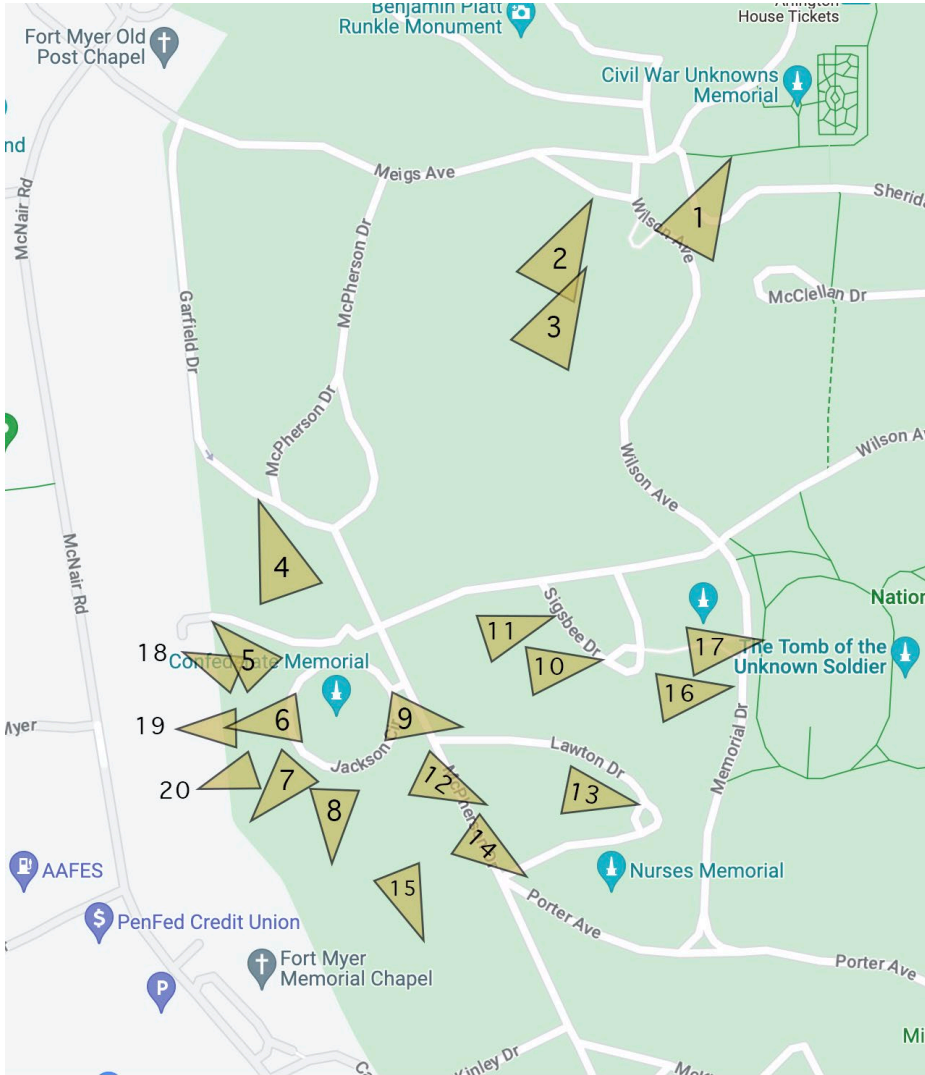
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Angle of photo and photo number in **YELLOW**.



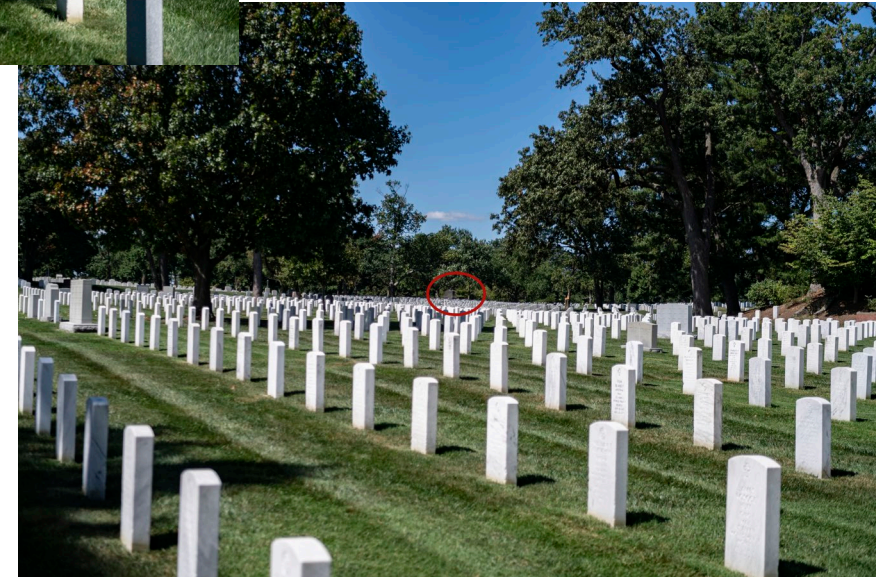
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APE VIEWSHEDS: AUGUST 2023



View 15: Confederate Memorial partially visible



View 16: Confederate Memorial partially visible

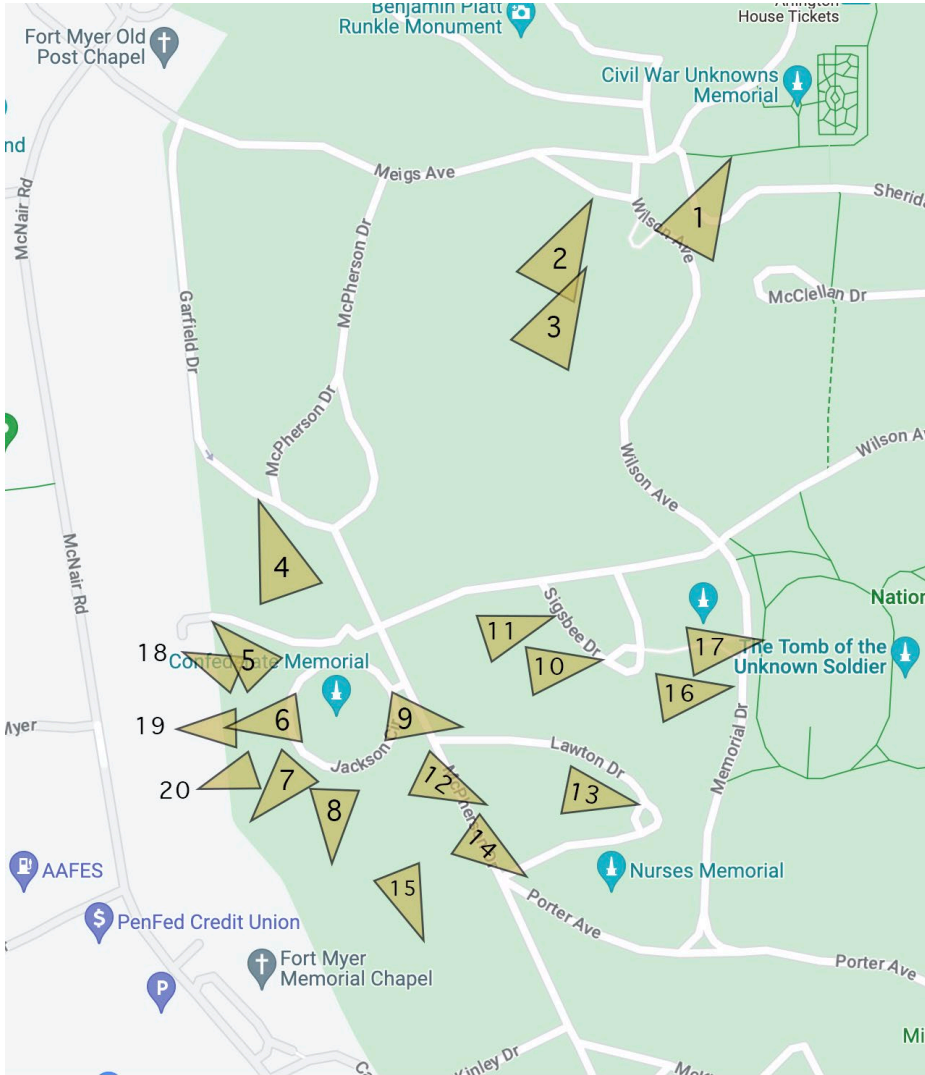
Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



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APE VIEWSHEDS: AUGUST 2023



View 17: Confederate Memorial not visible



View 18: Confederate Memorial partially visible from Fort Myer boundary

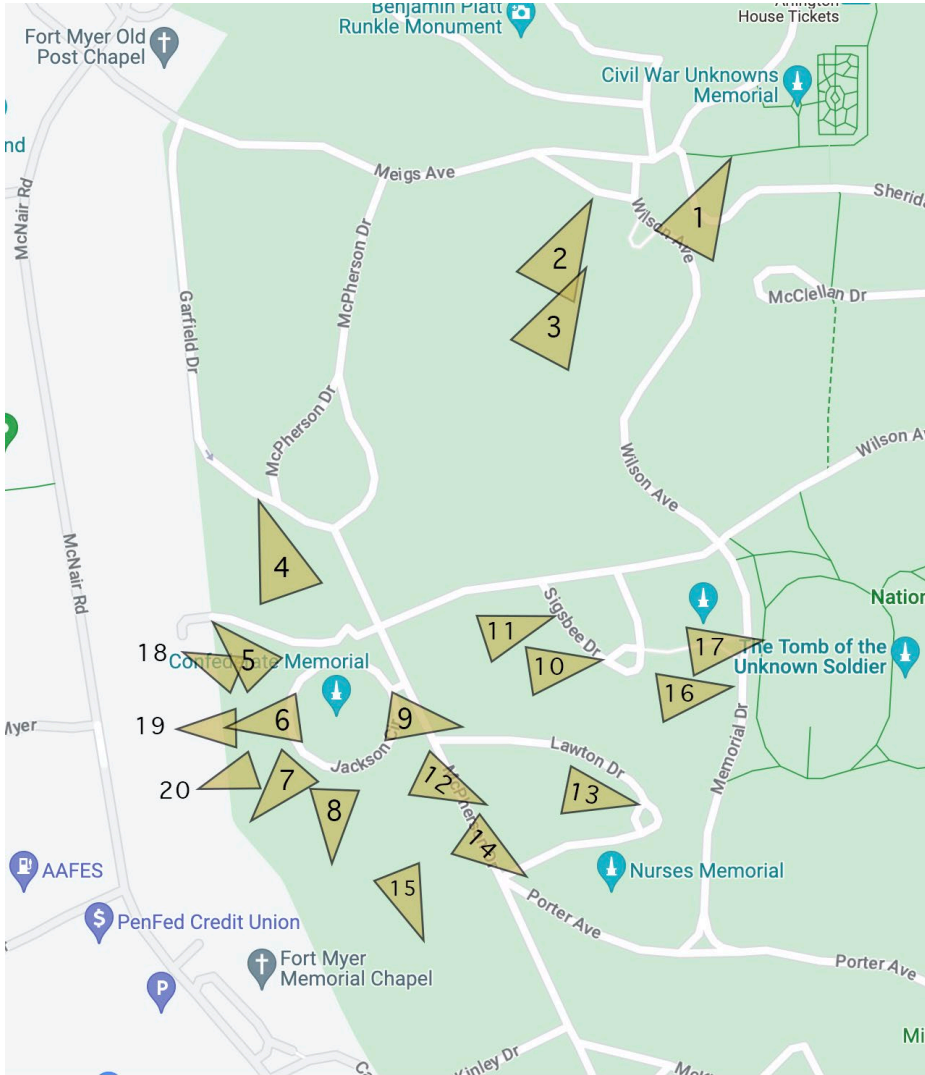
Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



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APE VIEWSHEDS: AUGUST 2023



View 19: Confederate Memorial visible from Fort Myer boundary



View 20: Confederate Memorial visible from Fort Myer boundary

Viewshed Map Key
Angle of photo and photo number in **YELLOW**.



ALTERNATIVE SPECIFIC NOTES

1. STATUS QNOL, NO CHANGE IS MADE TO THE CURRENT CONFIGURATION OF THE CONFEDERATE MEMORIAL.
 - 1.1. NO ACTION REQUIRED.
2. ALTERNATIVE A - INTERPRET THE CONFEDERATE MEMORIAL.
 - 2.1. EXAMINE MEMORIAL AND SUBMIT A BRIEF CONDITION REPORT.
 - 2.2. PROVIDE CYCLICAL MAINTENANCE INCLUDING:
 - 2.2.1. SPOT REFINISHING/REPLACEMENT OF LEAD JOINT COVERS OF GRANITE BASE (10-YEAR CYCLE).
 - 2.2.2. TRIM VEGETATION AROUND PEDESTAL (ANNUAL CYCLE).
 - 2.2.3. REMOVE ELEMENTS LEFT BEHIND BY VISITORS (MONTHLY CYCLE).
3. ALTERNATIVE B - DISASSEMBLE BRONZEWORK AND GRANITE PEDESTAL FOR REUSE.
 - 3.1. EXAMINE STATUE AND BASE. PROVIDE DISASSEMBLY PLAN FOR REVIEW BY GOVERNMENT AND ARCHITECT. INDICATE LOCATIONS OF CUTTING, IF REQUIRED. DESCRIBE METHODS FOR DISASSEMBLY. LABEL EACH ELEMENT ON AN ELEVATION OR PHOTOGRAPH WITH A UNIQUE IDENTIFICATION NUMBER FOR EACH ELEMENT. THE DOCUMENTATION SHOULD INDICATE THE NUMBER OF ELEMENTS IN SITU BEFORE THEY ARE DISASSEMBLED SO THEY CAN BE REASSEMBLED IN THE FUTURE, IF NECESSARY.
 - 3.2. CAREFULLY DISASSEMBLE BRONZEWORK AT SEAMS, WHERE POSSIBLE, UNSCREW OR CUT CONNECTIONS AT STRUCTURAL FRAME.
 - 3.3. IF CUTTING OF BRONZE IS REQUIRED FOR DISASSEMBLY, CUT ONLY AT DISCREET LOCATIONS TO MINIMIZE DISRUPTION TO SCULPTURAL ELEMENTS.
 - 3.4. CAREFULLY DISASSEMBLE STRUCTURAL FRAME, CUT OR UNSCREW ELEMENTS TO ALLOW FOR REASSEMBLY.
 - 3.5. CAREFULLY DISASSEMBLE STONE PEDESTAL PRIOR TO STONE DURING DISASSEMBLY TO PREVENT DAMAGE SUCH AS SPALLS, SCRAATCHES, OR CRACKS. IF DAMAGE OCCURS, KEEP BROKEN ELEMENTS TOGETHER FOR FUTURE REPAIR.
 - 3.6. AFFIX PERMANENT LABELS TO EACH BRONZE OR GRANITE ELEMENT ON THE REVERSE SIDE VIA STAMPS, ETCHING, OR PERMANENT MARKER. DO NOT USE LABELS ON TAGS OR TAPE THAT CAN FALL OFF.
 - 3.7. CLEAN BRONZEWORK OR GRANITE TO REMOVE LOOSE DIRT AND DEBRIS PRIOR TO STORING OFF-SITE. IF WATER IS USED FOR CLEANING, ENSURE ALL ELEMENTS ARE DRY PRIOR TO CRATING AND STORAGE. CHEMICAL CLEANERS ARE NOT RECOMMENDED FOR GENERAL SOILING REMOVAL.
 - 3.8. CRATE ALL BRONZE MATERIALS SEPARATELY. PROTECT EACH ELEMENT FROM DAMAGE DURING TRANSPORT. VENT EACH CRATE TO ALLOW FOR AIR CIRCULATION.
 - 3.9. LABEL EACH CRATE INSIDE A PAPER INVENTORY OF EACH ELEMENT WITHIN CRATE IN A PLASTIC PROTECTIVE SLEEVE.
 - 3.10. STORE STONE PEDESTAL ELEMENTS OFF OF GROUND ON PALLETS.
 - 3.11. MAINTAIN A DIGITAL MASTER INVENTORY OF ALL BRONZE AND GRANITE ELEMENTS INCLUDING CONDITION PHOTOS AND MEASUREMENTS, AND TRANSFER WITH MEMORIAL.
4. ALTERNATIVE C - DEMOLISH BRONZEWORK AND GRANITE BASE.
 - 4.1. EXAMINE STATUE AND BASE. PROVIDE DISASSEMBLY PLAN FOR REVIEW BY GOVERNMENT AND ARCHITECT. INDICATE LOCATIONS OF CUTTING, IF REQUIRED. DESCRIBE METHODS FOR DISASSEMBLY. LABEL EACH ELEMENT ON AN ELEVATION OR PHOTOGRAPH WITH A UNIQUE IDENTIFICATION NUMBER FOR EACH ELEMENT. THE DOCUMENTATION SHOULD INDICATE THE NUMBER OF ELEMENTS IN SITU BEFORE THEY ARE DEMOLISHED FOR THE HISTORIC RECORD.

GRAVESITE BOUNDARIES INDICATED HAVE NOT BEEN VERIFIED. MARKER LOCATIONS MAY HAVE SHIFTED OVER TIME. VERIFY CONDITIONS AT FOUNDATION BY CONDUCTING HAND-EXCAVATED TEST PITS.

1 Bronze Statue, Pedestal, Plinth

Approximate Height 12' 11"
Approximate Pedestal Width 4' 8.5"
Approximate Plinth Width 5' 5"

2 Circular Bronze Frieze, Plinth

Approximate Height 8' 8"
Approximate Width (Frieze) 5' 5"
Approximate Width (Plinth) 9' 3"

3 Octagonal Granite Base

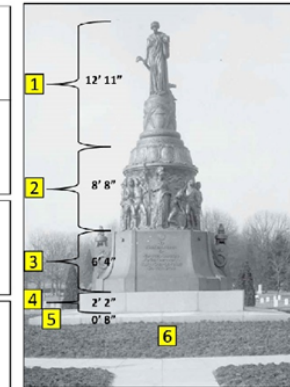
Approximate Height 6' 4"
Approximate Width (Top) 11' 2"
Approximate Width (Bottom) 14' 11"

4 Rectangular Granite Plinth

Height 2' 2"
Width 20' 0.5"
Depth 18' 0.5"

5 Square Granite Base

Height 0' 8"
Width 27' 8"
Depth 27' 8"

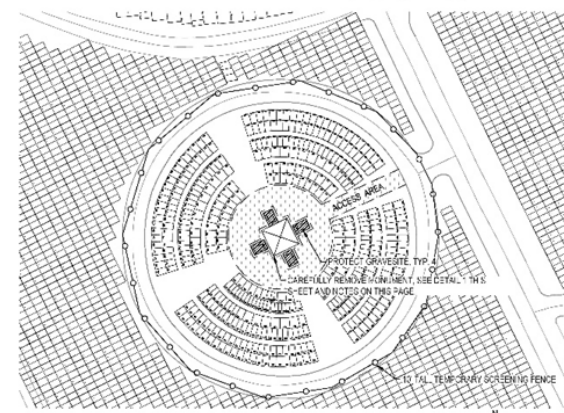


6 Foundation Base Underground

Multi-layer
First layer - 32' square / 1' deep
Second layer - 34' square / depth unknown

1 MONUMENT ELEVATION

1"=67'



2 SITE PLAN EXISTING CONDITIONS

1"=67'



DATE	DESCRIPTION	DATE	DESCRIPTION

DATE	DESCRIPTION	DATE	DESCRIPTION

APPROVAL POINT BY CIVIL ENGINEER
ARLINGTON NATIONAL CEMETERY
FLEXINGTON, VA

ALTERNATES A, B AND C.
REMOVE, TAG, AND PREP FOR STORAGE.

SHEET IDENTIFICATION
HP-101

DELIBERATIVE WORK PRODUCT

FILE NAME: STONE LOCATIONS V2.DWG
XREF REF: XDC00X
CLOT DATE: 3/30/2022 10:56:58 PM



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PROJECT DRAWINGS



