



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

September 6, 2024

SUBJECT: National Historic Preservation Act Section 106 for the Washington Gas Line Replacement Project on the Grounds of Arlington National Cemetery, Arlington, Virginia (DHR Project No. 2024-4806)

Julie V. Langan
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

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

Dear Ms. Bellville-Marion:

Army National Military Cemeteries (ANMC) would like to take this opportunity to formally initiate the consultation process with the Virginia Department of Historic Resources (DHR) in accordance with Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, and its implementing regulations, 36 C.F.R. Part 800. ANMC proposes a gas line replacement project within Arlington National Cemetery (ANC). Washington Gas Light Company (WGL) proposes replacing, abandoning, and rerouting sections of an existing gas line that runs near Sherman, Lincoln, and Ord & Weitzel Drives to improve service to the Eternal Flame at the John F. Kennedy (JFK) Memorial Gravesite. This is a Virginia SAVE (Steps to Advance Virginia's Energy Plan) accelerated system replacement program project. The proposed project is considered a federal undertaking with the potential to cause adverse effects on historic properties pursuant to 36 C.F.R. 800.3(a). Per 36 CFR § 800.3(c), ANMC identifies the Virginia Department of Historic Resources (DHR) as the appropriate State Historic Preservation Office (SHPO) to be involved in the Section 106 process.

The project is within both the Arlington National Cemetery and Arlington House Historic Districts. Therefore, ANMC is coordinating the project design with the National Park Service (NPS) George Washington Memorial Parkway (GWMP) to reduce potential impacts to historic, archaeological, and tree resources on lands managed by both agencies. The gas line replacement requires WGL to obtain permits from the NPS-GWMP in order to perform work on the Arlington House national park lands.

ANMC shall serve as the lead agency for the project with responsibility for all National Historic Preservation Act (NHPA) compliance.

The project is located within both the Arlington National Cemetery and Arlington House National Register Historic Districts. To determine the potential effects to both historic properties, ANMC undertook a tree survey and inventory in October 2023, and a Phase I archeological survey in December 2023. The Phase I archaeological survey did not identify any new National Register-eligible sites or cultural features in the APE. The APE contains two sites that are listed on the National Register, but the survey determined the portions of the sites within the APE generally have limited integrity and research potential. No Phase II or other archaeological investigations were recommended. To avoid disturbing known archaeological sites in the APE, existing gas lines will be abandoned in Arlington Woods. Installation of the new gas line on Arlington House grounds will occur in a previously disturbed area. The full findings can be found in the enclosed pre-final Phase I archaeological survey report.

Additional information regarding the proposed undertaking can be found in Attachment A: *Section 106 Process Submission: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects*, and on the ANC website: <https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices>.

With this letter, ANMC notifies the DHR that, in accordance with Section 106 of the National Historic Preservation Act (NHPA), the agency has:

1. Found that the proposed undertaking affects historic properties.
2. Identified potential consulting parties.
3. Identified the historic properties.
4. Identified the area of potential effects (APE).
5. Applied the criteria of adverse effects (36 CFR § 800.5[a][1]) to the undertaking and finds that the proposed project would have no adverse effects to historic properties in the Area of Potential Effects (APE).

By way of this submission, ANMC requests that the DHR:

1. Respond to ANMC's request for review of its finding of effect on historic properties.
2. Provide concurrence or comments on the determined APE.
3. Provide concurrence or comments on the identified potential consulting parties.
4. Respond to ANMC's findings of:
 - a) No adverse effects to the Arlington National Cemetery Historic District (000-0042).
 - b) No adverse effects to the Arlington House Historic District (DHR # 000-0001).

c) No adverse effects to archaeological sites.

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

Concurrent with this submission, ANMC notified consulting parties and the public of the agency's findings and determinations, and of the initiation of a 30-day comment period. The notices and Section 106 documentation are posted on the ANC website: <https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices>.

Army National Military Cemeteries looks forward to continuing the Section 106 consultation process with our agency partner, the George Washington Memorial Parkway, consulting parties, and the public. We respectfully request your review and consideration of the information provided. Thank you for your support.

Sincerely,



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

Attachments:

- A Section 106 Process Submission: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects

Current List of Consulting Parties:

In accordance with 36 CFR § 800.3(f) and § 800.2(c), ANMC developed an initial list of other parties entitled to be consulting parties. This list will be further developed in consultation with the DHR.

ANMC identified the following other consulting parties:

- Catawba Indian Nation
- Chickahominy Indian Tribe-Eastern Division
- Delaware Nation, Oklahoma
- Nansemond Indian Nation
- National Park Service, George Washington Memorial Parkway (GWMP)
- Pamunkey Indian Tribe
- Rappahannock Tribe, Inc.
- Upper Mattaponi Tribe

Selected Project Background Information:

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

Arlington House Historic District National Register Nomination:
<https://www.dhr.virginia.gov/historic-registers/000-0001/>

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

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