



WASHINGTON GAS LINE REPLACEMENT DHR PROJECT NO. 2024-4806

SECTION 106 PROCESS SUBMISSION

Army National Military Cemeteries Arlington National Cemetery Arlington, Virginia

6 September 2024





Chillum Rock Creek Park East Riverdale Capital Crescent Trail Special Park Hyattsville 193 Petworth 201 Mt Rainier Mt Pleasant 201 [1] Columbia Heights Parkway Anacostia Park, Section G Trinidad K St NW 29 Langston Blvd C St NE Arlington Washington Capitol St NE 237 [50] 503 395 Coral Hills Anacostia Arlington Village **Arlington National Cemetery** Douglass Suitland Fort Ward Hillcrest Parkway Washington Heights Highlands Barnaby Manor Oaks 420 Lincolnia Park Oxon Hil

WASHINGTON GAS LINE REPLACEMENT DHR PROJECT NO. 2024-4806

Army National Military Cemeteries Arlington National Cemetery Arlington, Virginia

SECTION 106 PROCESS SUBMISSION:

PROJECT DESCRIPTION, IDENTIFICATION OF CONSULTING PARTIES, IDENTIFICATION OF HISTORIC PROPERTIES, AREA OF POTENTIAL EFFECTS, & ASSESSMENT OF EFFECTS

ANMC Project Contacts:

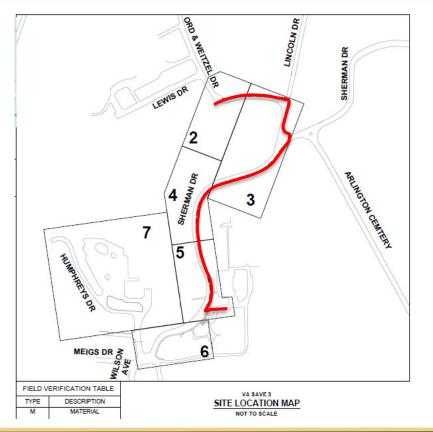
Francis Han
Project Manager
Engineering, Design & Construction

Caitlin Smith Cultural Resources Program Manager Engineering, Planning & Resources

Submission: September 6, 2024







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.

This proposed project will improve safety and reduce future maintenance by enhancing the integrity of the gas pipelines and providing a more reliable fuel source to the Eternal Flame. This includes replacing approximately 2,365-feet of existing 2-inch wrapped steel gas main (ca. 1965) with a 2-inch plastic gas main. Work involves excavations over the existing gas main and installation of a replacement line within the Sherman Drive roadway, between Lincoln Drive and Meigs Drive. In addition, two existing 3/4-inch services (ca. 1966) feeding the Eternal Flame at the JFK Memorial Gravesite would be replaced. This requires a two-foot trench be cut through the Arlington House site's permeable sidewalk. All affected and disturbed areas will be restored, including grading, seeding and any hardscape restoration, including asphalt paving.

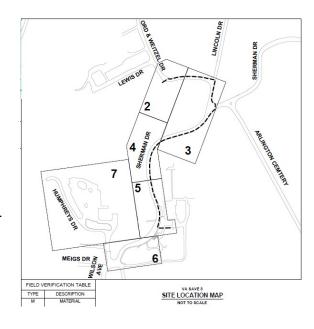
The majority of the work is to occur at night, to minimize impacts to Arlington National Cemetery (ANC) and National Park Service (NPS) operations.

In consultation with the NPS, the agencies have come to a joint agreement that ANC will serve as the lead agency to assess any effects to historic and archaeological resources on the NPS and ANC properties.

GROUND DISTURBANCE



- Area of disturbance (in acres): 0.14 acres
- Depth of disturbance: +/- 42-inches
- Ground disturbance method: Open cut / direct bury hand digging, backhoe excavation, and vacuum excavation.
- A new gas main line would be installed in the roadways, starting with a tie-in on NPS property just south of the intersection of Ord and Weitzel Drive and Lewis Drive.
 - Horizontal extent (length x width) of disturbance: 2,310-feet long x 2-feet wide
 - Tie-in excavation: approximately 6 cubic yards
 - Tie-in hole dimensions: 6-feet wide x 6-feet wide x 4-feet deep
- A new service line would be installed from Sherman Drive, past Arlington House, to the source for the Eternal Flame. This requires excavation to install under sidewalk crossings without cuts. This includes two service lines, so the trench will be wider than the one for the main line.
 - Horizontal extent (length x width) of disturbance: 475 -feet long x 3-feet wide
 - Trench dimensions: approximately 2-feet wide x 42-inches deep x 215-feet long
 - Trench excavation: approximately 60 cubic yards
- Excavated materials will be stored in a dump truck until they are transported off-site.
- Project equipment includes an excavator, a dump truck, and a pickup truck.



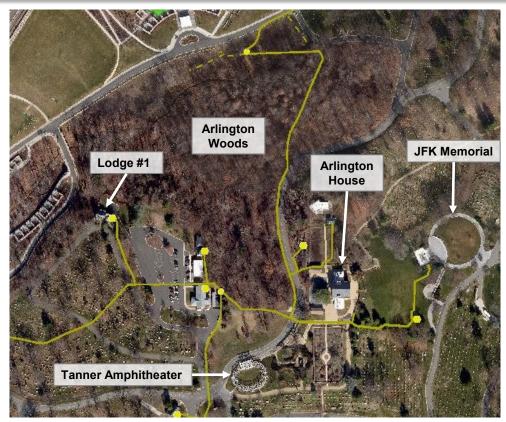


PROJECT DESIGN DECISIONS



Through a deliberative design process, USACE, ANMC, and the NPS-GWMP, developed the project scope and constraints.

- Minimize impacts to NPS property, including the Arlington Woods and potential archaeological sites
- Minimize impacts to ANC property, including mature trees and burial spaces
- Minimize the amount of land transfer or right-of-way agreements
- Abandon lines in sensitive areas with potential impacts to known and unknown archaeological sites and historic properties
- Work is planned to be performed at night outside of visiting hours.
 Staging area is away from visitors and daily operations.
- Abandonment of old lines will include purging old gas lines out of service to 0% gas reading, cutting, and capping abandoned pipes.
- Staging for the project will occur in the parking area next to the NPS Old Administration Building. During construction, the staging area will be closed off.
- Traffic control will be utilized for equipment movement as necessary, however since the work will be done at night, minimal traffic disturbance is anticipated.



Site map showing existing gas lines and historic properties



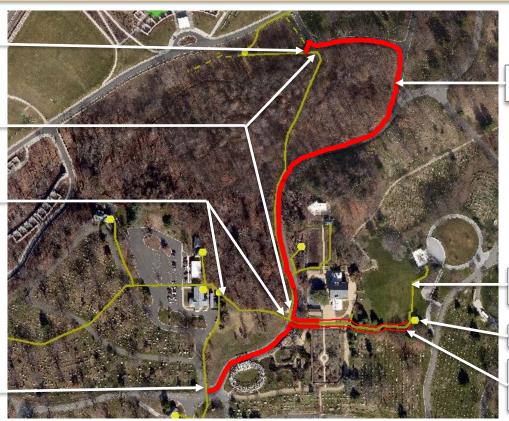


CONNECT NEW LINE TO EXISTING

ABANDON GAS LINE IN WOODS AND ALONG SHERMAN DRIVE

ABANDON GAS LINE

CONNECT NEW LINE TO EXISTING



INSTALL NEW 2" GAS LINE UNDER ROAD

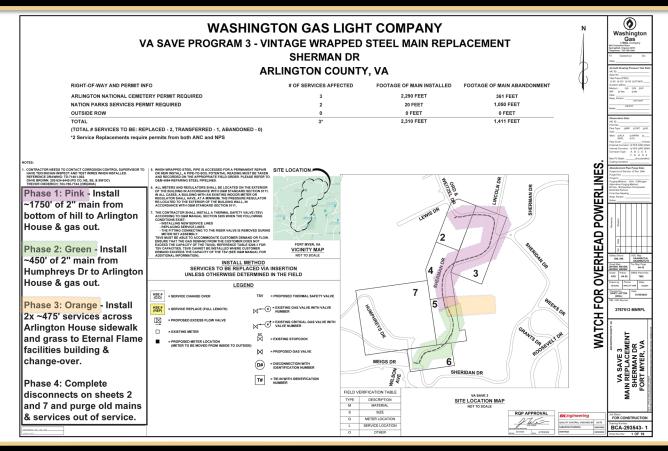
GAS LINE FROM SERVICE BUILDING TO JFK FLAME

SERVICE BUILDING

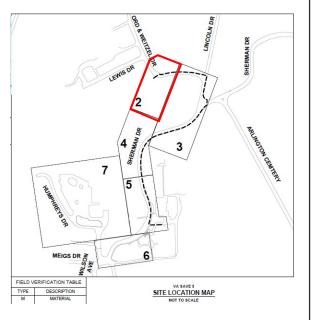
INSTALL TWO (2) NEW 3/4" GAS LINES TO JFK SERVICE BUILDING

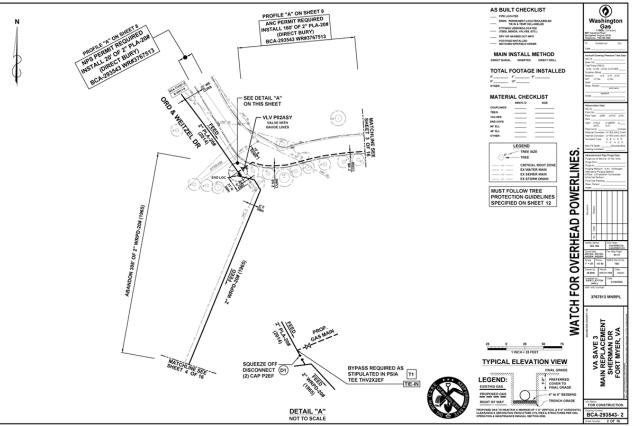
Construction Sequence (Refer to Subsequent Construction Drawings):

- 1. Establish traffic control and a safe work environment.
- 2. Direct Bury 1,850' of 2" PLA-20# on Sherman Rd, Lincoln Dr, and Ord and Weitzel Dr. 3' below grade. (ANC Permit)
- 3. Direct Bury 90' of 2" PLA-20# between the Arlington House and Garden, from Sherman Dr. to north Eternal Flame service 3' below grade. (NPS Permit)
- 4. Direct Bury 90' of 2" PLA-20# between the Arlington House and Garden, from Sherman Dr. to south Eternal Flame service 3' below grade. (NPS Permit)
- 5. Install bypass per PSIA and construction drawings.
- 6. Use thermal hot tapping tee to tie-in new 2" PLA-20# with existing 2" PLA-20# (2014).
- 7. Purge new 2" PLA-20# main into service.
- 8. Change Over 321 Sherman Dr. to new PLA-20# main.
- 9. Replace the north service of the Eternal Flame to the new 2" PLA-20# main.
- 10. Squeeze off gas for Disconnect #1.
- 11. Purge 2" WRPD-20# main out of service.
- 12. Direct Bury 465' of 2" PLA-20# on Sherman Rd. from 319 Sherman Dr to Humphries Dr. 3' below grade. (ANC Permit)
- 13. Use thermal hot tapping tee to tie-in new 2" PLA-20# with existing 2" PLA-20# (1981).
- 14. Purge new 2" PLA-20# main into service.
- 15. Replace the south service of the Eternal Flame to the new 2" PLA-20# main.
- 16. Use Nipple and Plug for Disconnect #2.
- 17. Purge 2" WRPD-20# main out of service.
- 18. Backfill, compact, & restore all cuts.

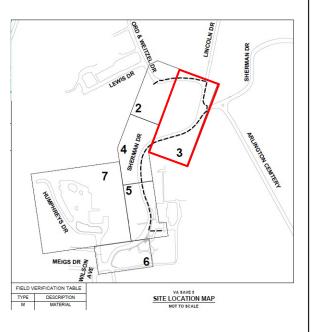


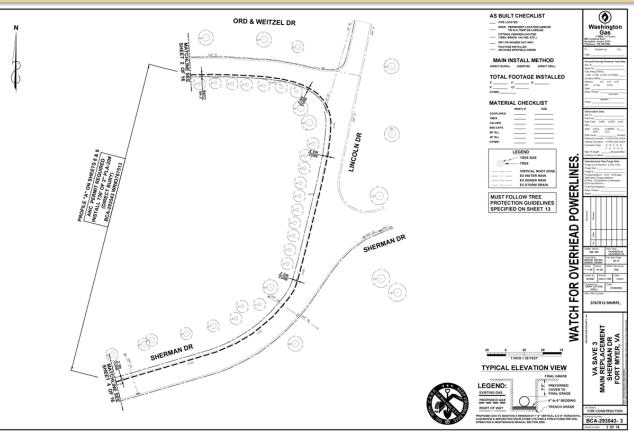




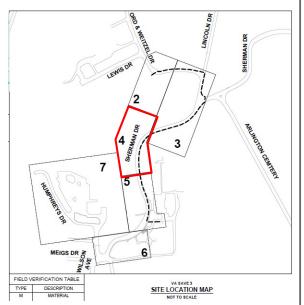


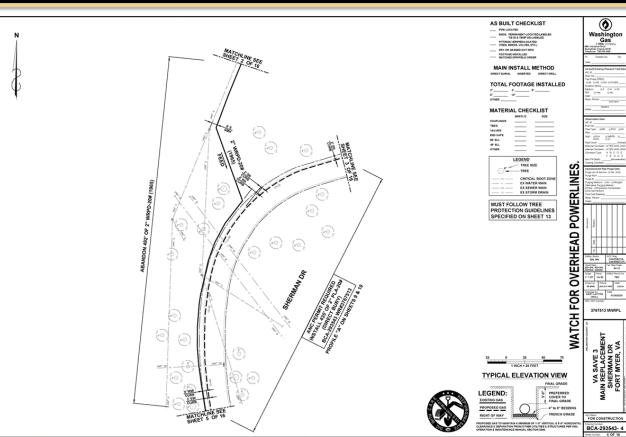
SITE PLAN

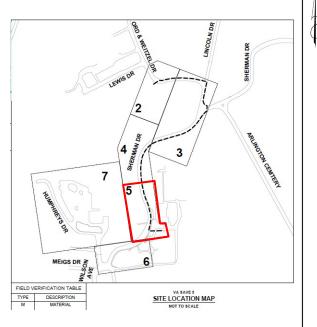


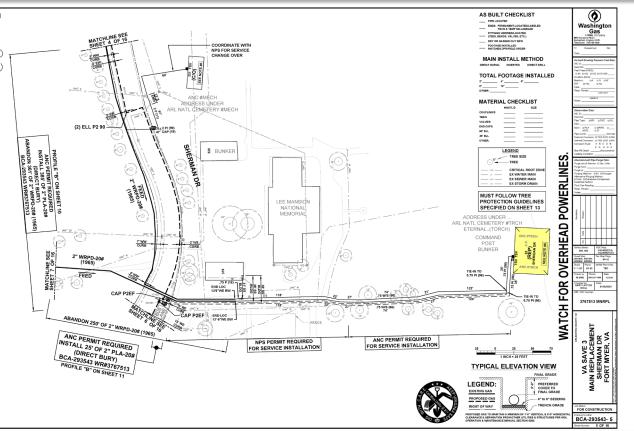


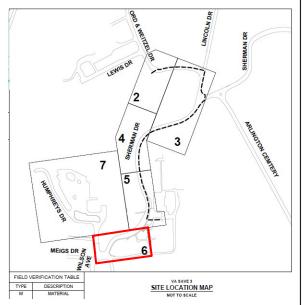


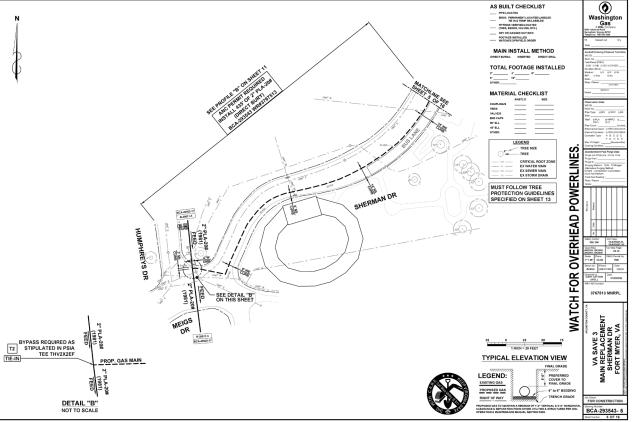


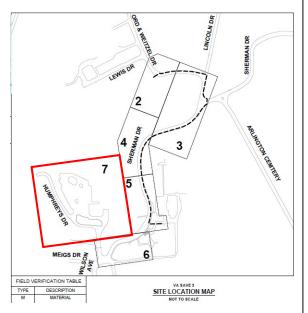


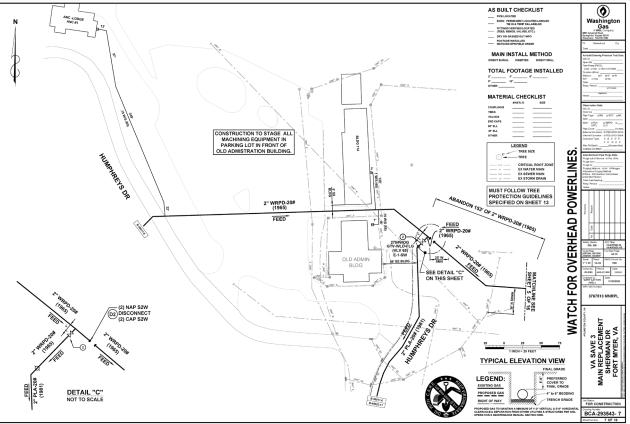


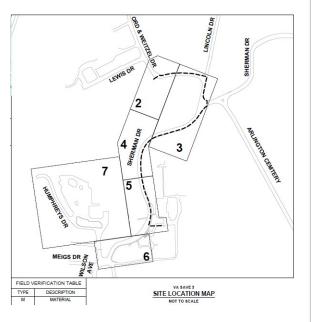


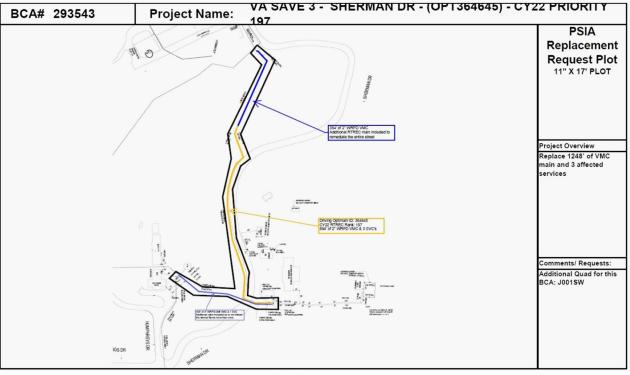


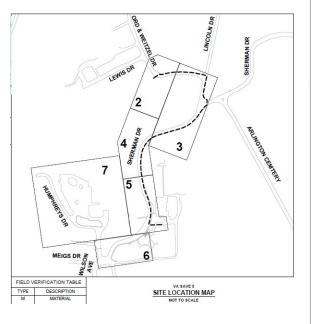


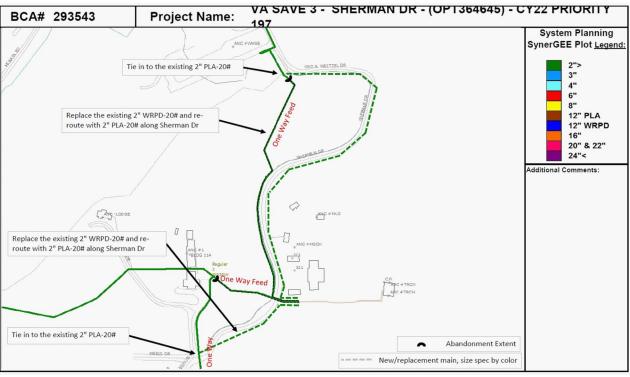






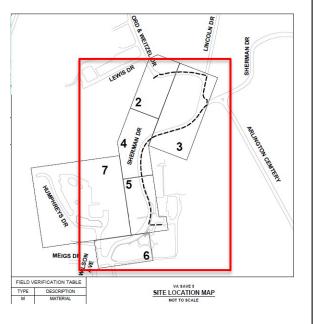


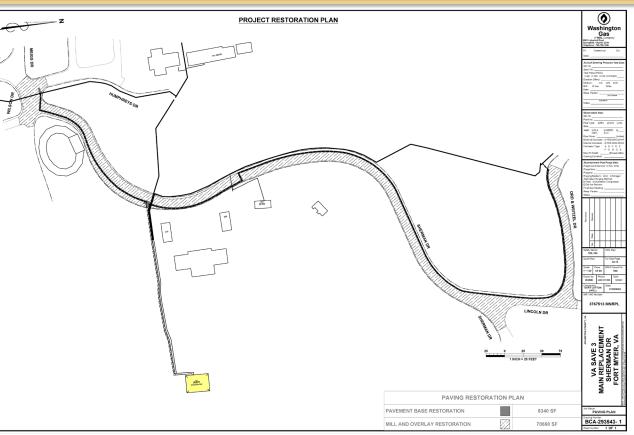






POST-CONSTRUCTION REPAVING PLAN







ANMC & NPS-GWMP INTERAGENCY COORDINATION



ANC & NPS SECTION 106 RESPONSIBILITIES

In consultation, ANMC and the NPS George Washington Memorial Parkway (GWMP) have come to a joint agreement regarding compliance responsibilities for the proposed project. In a letter dated May 9, 2023, the NPS-GWMP designated ANC as the lead federal agency authorized to act on behalf of NPS-GWMP and to fulfill the agencies' collective responsibilities under Section 106 according to 36 CFR 800.2(a)(2). Under this agreement, NPS-GWMP requires ANC to take responsibility for monitoring potential effects to historic and archaeological resources on NPS and ANC properties.

In the May 9 letter, Christine Smith (speaking for Charles Cuvelier, Superintendent of GWMP) stated the collective Section 106 responsibilities for both agencies:

Responsibilities of Arlington National Cemetery

As lead federal agency, ANC is expected to fulfill certain requirements to comply with the NHPA and ensure effective collaboration with NPS:

- Address Section 106 compliance requirements, including: determining the Area of Potential Effects, identifying historic properties, determining the effect of the undertaking on historic properties, and seeking to avoid or minimize adverse effects to historic properties. If there is a finding of adverse effects, ANC will work with NPS to resolve those effects as documented in a Memorandum of Agreement or project Programmatic Agreement.
- Promote communication, coordination, and consultation, by identifying and inviting consulting parties (including SHPOs and THPOs) to participate in the Section 106 process, provide draft plans to NPS and other consulting parties for comment throughout the duration of each project, and seek input on eligibility, effect, and treatment activities.
- Notify NPS in writing when the Section 106 consultation has been concluded, provide final documentation of the review process, and, where applicable, provide a copy of the executed agreement document.

ANC & NPS SECTION 106 RESPONSIBILITIES

Responsibilities of the National Park Service

NPS will provide support to ANC throughout the Section 106 process in a variety of ways:

- Review draft project plans and documents, as well as Section 106 documents, and provide comments.
- Provide relevant data, reports, and research to ANC as needed.
- Issue a Special Use Permit so that ANC can access NPS land to identify historic properties and complete the Assessment of Effect.
- Notify ANC if the decision is made to withdraw from the joint Section 106 process and complete an individual review.







ANC, in agreeing to the aforementioned responsibilities, executed a contract, with support from NPS GWMP, to perform the following surveys:

- Phase I Archeological Survey and Tree Survey of areas within the APE for this project and a project to reconstruct and realign Sherman Drive.
- The survey covers a 50-foot-wide area (Survey Area A) within Arlington Woods along Sherman Drive, and a small corridor south of Arlington House (Survey Area B) adjacent the rose garden.

The tree survey field work took place in October 2023. The inventory and maps were approved by ANMC and NPS-GWMP in February 2024. ANC will be required to have the construction contractor utilize the tree survey data to identify trees in the APE that need to be protected. The Phase I archeological survey field work occurred in December 2023. The pre-final report and maps were approved by ANMC and NPS-GWMP in May 2024.



ANC & NPS SECTION 106 RESPONSIBILITIES

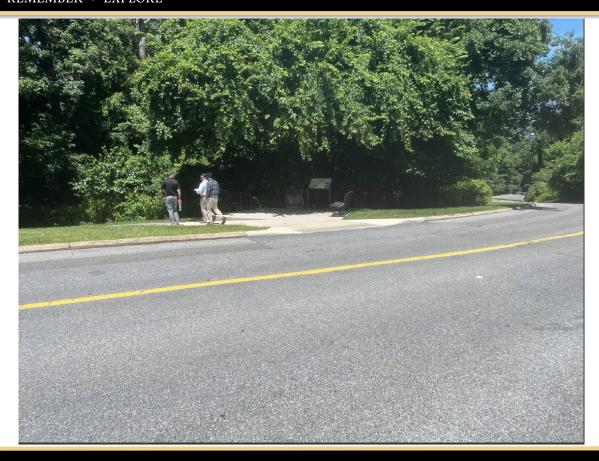
ANC also incorporated the following requirements into the project contract:

"An independently contracted Archaeological Monitor to be contracted by USACE will observe all ground-disturbing site work periodically and as an on-call service, as needed. This includes construction of temporary facilities, at all archeologically sensitive areas, from a safe location mutually agreed on by Contractor and Monitor" (2.1.A Monitoring- Execution).

"Archaeological Monitor or USACE Contracting Officer Representative (COR) will request that the contractor immediately halt work in the immediate area if potential archaeological resources or previously unidentified cultural resources are discovered..." (2.2 Discovery of Resources).

Furthermore, all projects contracted by ANC must conform with the "Programmatic Agreement Among Arlington National Cemetery, the Virginia State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Operation, Maintenance, and Repair Activities at Arlington National Cemetery," which requires the provisions of Stipulation VII are included in all ANC operations and contracts involving ground disturbance. Stipulation VII provides standard procedures for post review discovery of cultural resources or unanticipated effects, and unidentified human remains dating prior to the establishment of Arlington National Cemetery.

Arlington House, The Robert E. Lee Memorial National Park Service Project Boundary Survey Area A -Length: 183 Ft Area: 2742.73 SqFt Survey Area B



View of Survey Area A from Sherman Drive looking northwest from the Arlington House tram stop



View of Survey Area A from Ord & Weitzel Drive looking southeast

View of Survey Area B looking east, between Arlington House and the rose garden.



Same view showing existing and proposed new gas lines.





View of Survey Area B looking west, between Arlington House and the rose garden.



NATIONAL HISTORIC PRESERVATION ACT (NHPA) SECTION 106 DOCUMENTATION



SECTION 106 PROCESS INITIATION



View looking west toward Arlington House, with Sherman Drive and the Arlington Woods behind

Army National Military Cemeteries (ANMC) initiates the section 106 process for the proposed roadway reconstruction and sidewalk improvement project within 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 identifies the Virginia Department of Historic Resources (DHR) as the appropriate State Historic Preservation Office (SHPO) to be involved in the section 106 process.

Per 36 CFR § 800.3(c), ANMC plans to involve the public in the section 106 process. After initiating consultation with the DHR, ANMC will notify potential consulting parties and the public of the undertaking via email, social media, and the ANC website, inviting them to participate in the consultation process. ANMC will work in consultation with the DHR to develop the plan for involving the public in the section 106 process.





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.

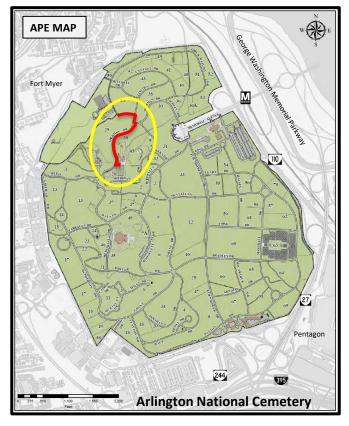
ANMC identified the following other consulting parties:

- 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





AREA OF POTENTIAL EFFECTS



Per 36 CFR § 800.4 & § 800.16, ANMC identified the Area of Potential Effects (APE) for the proposed project, 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.

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.

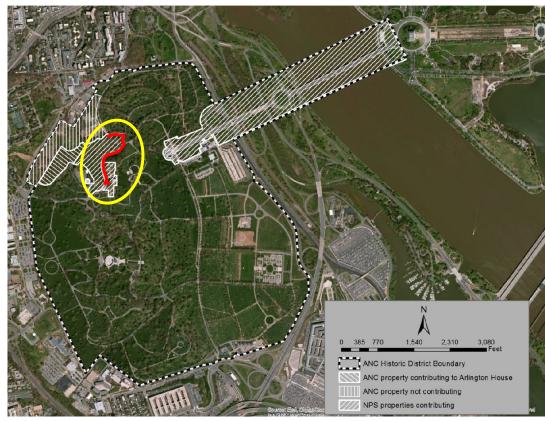
For this undertaking, the project area is located within the Arlington National Cemetery Historic District (Virginia Department of Historic Resources [VDHR] #000-0042) and the Arlington House Historic District (VDHR #000-0001). The project APE is outlined in yellow on the map to the left.

The APE includes locations where equipment will be placed during the gas line abandonment and installation project. Most of this work would occur along Sherman, Ord and Weitzel, and Meigs Drives, and involves abandonment of gas lines in the Arlington Woods. The project will install a new gas service line between Arlington House and the Rose Garden.

Map of Project Area
APE outlined in YELLOW.
Proposed project locations in



AREA OF POTENTIAL EFFECTS



During construction, temporary sound and visual effects are expected within 100 feet of the project area. Work will occur after the sites close to the public. Construction equipment will access the site via the cemetery's main entrance on Memorial Avenue, the Service Complex Gate at the cemetery's southern entrance, and the Ord and Weitzel Gate at the cemetery's northern entrance.

When the project is completed, there will be no changes to the viewsheds and landscape within the Arlington House and Arlington National Cemetery Historic Districts. All work is below grade and will not be visible. There will be temporary visual impacts during construction, concentrated near Sections 1, 26, 28, 29, 30, 45, Arlington House, and the Arlington Woods, where the construction activities will be visible.

During construction, there will be temporary, localized impacts to traffic patterns within the cemetery. Washington Gas will need to reduce portions of Sherman Drive down to one lane during construction. The project will not create long-term changes to land use or traffic patterns.

The project does involve ground disturbance in the historic ANC and Arlington House landscapes.

National Register Historic Districts

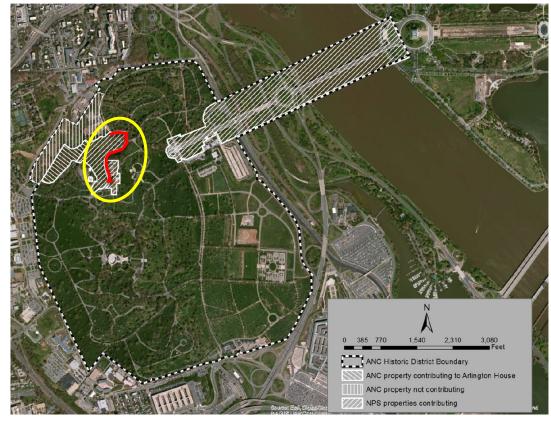
From ANC's National Register Nomination Form (2014)

Map of Project AreaAPE outlined in YELLOW.

Proposed project locations in RED.



IDENTIFICATION OF HISTORIC PROPERTIES



Historic Properties within the APE

Per 36 CFR § 800.4, the following is a list of historic structures and features contributing to the ANC 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.

- Arlington National Cemetery Historic District (DHR #000-0042)
- Arlington House Historic District (DHR # 000-0001)
- Arlington House Cultural Landscape (CLI #600049)
- Headstones and Grave Markers (DHR #000-0042-0021)
- Headstones and Grave Markers (DHR #000-0042-0021)
- Burial Sections 1, 26, 28, 29, 30, and 45
- Pan Am Flight 103 Memorial Cairn (DHR ID#: 000-0042-0037)
- Kennedy Gravesites (DHR ID#: 000-0042-0033)

National Register Historic Districts

From ANC's National Register Nomination Form (2014)

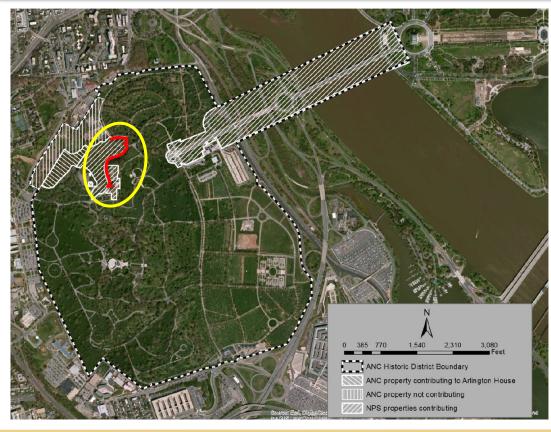
Map of Project Area

APE outlined in YELLOW.

Proposed project locations in RED.



IDENTIFICATION OF HISTORIC PROPERTIES



National Register Historic Properties within the APE

The following is a list of historic properties on the National Register (IAW 36 CFR part 63) within the APE:

- Arlington National Cemetery Historic District (DHR #000-0042) https://www.dhr.virginia.gov/historic-registers/000-0042/
- Arlington House Historic District (DHR # 000-0001) https://www.dhr.virginia.gov/historic-registers/000-0001/

National Register Historic Districts

From ANC's National Register Nomination Form (2014)

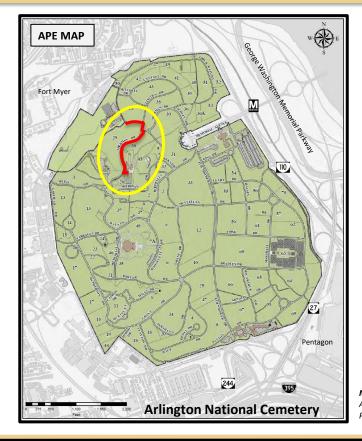
Map of Project Area

APE outlined in YELLOW.

Proposed project locations in RED.



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 will notify the DHR, potential consulting parties, including Indian tribes or organizations, and the public, inviting their views on:

- 1. The agency's finding that there is an undertaking that affects historic properties;
- 2. The agency's identification agency's identification of historic properties;
- 3. The agency's identification of the area of potential effects (APE);
- 4. The agency's assessment of no adverse effects to historic properties.

Map of Project AreaAPE outlined in YELLOW.

Proposed project locations in RED

DETERMINATION OF EFFECTS

Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the proposed undertaking – the Washington Gas Line Replacement project – will result in **no adverse effects to historic properties** listed on the National Register within and adjacent to the undertaking's APE:

- Arlington National Cemetery Historic District (000-0042)
- Arlington House (DHR # 000-0001)

By selecting methods such as abandonment of gas lines in the historic and archaeologically significant Arlington Woods, the project design avoids and/or minimizes the direct, indirect, and cumulative effects to above- and below- ground historic properties and contributing elements in the undertaking's APE. There will be no adverse effects to the integrity of the historic properties that would diminish their historical and architectural significance. There are no adverse impacts to the characteristics that qualify the historic properties for inclusion in or eligibility for the National Register of Historic Places (NRHP).

The historic properties retain their historic views and vistas after construction of the proposed project. Hard surfaces such as asphalt, concrete, curbs, pavers, etc. damaged during construction will be repaired or replaced. Landscaped areas will also be replanted and restored. The historic location and elements within the districts are maintained. Both sites continue to convey their historic significance for both their landscape architecture and architecture. There are no changes to the integrity of location, workmanship, feeling or associations for either of the Arlington National Cemetery or Arlington House National Register historic districts.

The project should not cause changes to the landscape in the area immediately surrounding the gas line replacements. The landscape (of which Arlington Woods is a part) is a contributing feature of the Arlington House Historic District, but the impacts to the landscape would not rise to the level of having an adverse effect on the historic district. ANC will work with WGL to protect trees and known archaeological sites. No tree removal is currently anticipated however, if necessary, NPS will determine which are to be replaced and where the replacement will occur. Of the trees surveyed within the project area, approximately 70% are small, with a DBH of 9 inches or less, so the trees to be removed are more likely to be small and less mature.

DETERMINATION OF EFFECTS

Assessment of Adverse Effects

Most of the proposed undertaking occurs within an already-disturbed footprint – the soils were disturbed by the construction of ANC roadways and the sidewalks surrounding Arlington House. As such, the proposed undertaking would have **no adverse effect to archaeological resources**. As approved by the NPS-GWMP, ANMC conducted a Phase I archaeological survey and a tree survey of Area's A and B near Arlington House and in the Arlington Woods to mitigate potential adverse effects to these resources. 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 (44AR0032 and 44AR017), 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. In the event of an unanticipated discovery, all work would cease, and the ANMC Cultural Resources Manager (CRM) would be contacted. The CRM would notify the NPS-GWMP, the Virginia Department of Historic Resources, and other appropriate agencies, and standard procedures would be followed to protect the artifacts and determine their significance.

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 invites comments from the Virginia Department of Historic Resources, consulting parties, and the public.

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

Reviewed by Megan Bailey, PhD Cultural Resources Program Manager George Washington Memorial Parkway



AGENCY REQUEST FOR RESPONSE TO FINDINGS

ANMC REQUEST TO DHR



View looking west toward Arlington House, with Sherman Drive and the Arlington Woods behind

ANMC requests that the DHR:

- 1. Respond to ANMC's request for review of finding of effect on historic properties.
- Provide concurrence or comments on the determined APE.
- 3. Provide concurrence or comments on the identified potential consulting parties.
- Review and provide comments on the pre-final Phase I archaeological survey report for Arlington Woods
- 5. 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 (DHR # 000-0001)
 - c) No adverse effects to archaeological sites

ANMC REQUEST TO DHR



View looking west toward Arlington House, with Sherman Drive and the Arlington Woods behind

In support of this request, ANMC submits the following documents to the DHR:

- Electronic Project Information Exchange (ePIX) system submission
- Section 106 Initiation Letter
- Section 106 Initiation Document: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects
- Phase I Archaeological Survey Report, Arlington Woods, Arlington National Cemetery, Arlington, VA, Pre-final Draft, May 2024 (digital and hardcopy, includes V-CRIS forms)

CONSULTATION & PUBLIC COMMENT



Public tour of the Arlington National Cemetery Memorial Arboretum, Arlington, Virginia, June 21, 2019

Concurrent with this submission, ANMC sends notifications to consulting parties and the public 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

This submission to potential consulting parties and the public includes:

- Section 106 Initiation Letter
- Section 106 Process Submission: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects
- · Consulting Party Notification Letter
- Public Notification Letter