

# **FINDING OF NO SIGNIFICANT IMPACT SECURITY UPGRADES AT ARLINGTON NATIONAL CEMETERY**

## **TITLE OF ACTION**

### **Environmental Assessment (EA) for Security Upgrades at Arlington National Cemetery**

Arlington National Cemetery (ANC) has prepared an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as implemented by the Council on Environmental Quality (CEQ) and Army regulations. The EA evaluates the potential consequences to the human and natural environment associated with proposed security upgrades. The EA is incorporated by reference.

## **PURPOSE AND NEED**

The purpose of the Proposed Action is to upgrade security measures at ANC. The Proposed Action remedies deficiencies and improves the overall security posture at ANC. As an installation under the jurisdiction of the U.S. Army—and one of unparalleled meaning to the Nation—the safety and security of ANC's resources and visitors are of utmost importance.

## **PROPOSED ACTION**

ANC proposes to upgrade security measures to meet antiterrorism and force protection (hereafter referred to as “security”) standards for federal facilities. ANC's current security measures do not meet the security standards for federal facilities. Internal and external assessments of ANC's security identified deficiencies between established security criteria and existing security conditions. Physical and operational security upgrades (i.e., the Proposed Action) have been identified to address deficiencies and improve the overall security posture of ANC. The following information summarizes the Proposed Action security projects.

### **Security Screening Memorandum of Agreement with Joint Base Myer – Henderson Hall**

ANC would develop a memorandum of agreement with Joint Base Myer – Henderson Hall (JBM-HH) to provide vehicle screening services for commercial delivery and service vehicles and clarify emergency operations center functions occurring within ANC's boundaries.

### **Flexible Operations Center in Welcome Center**

This project would retrofit a room in the Welcome Center to function as a flexible operations center (FLEXOPS) for ANC, supplementing the off-site emergency operations center at JBM-HH. The FLEXOPS would use existing ANC office space and would not displace, reduce, or eliminate existing visitor services.

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### **Fence and Boundary Wall Upgrades**

This project would upgrade ANC boundary fencing and walls to meet security standards at the Ord & Weitzel Drive Gate, Sections 52 and 53 along Memorial Avenue, the Visitor Parking Garage area, and around Sections 69 through 76.

### **Bollard and Barrier Upgrades**

This project would replace all bollards at ANC with 71 removable and interchangeable bollards at 35 locations. This project also would include installing 20 concrete planter barriers at the tram loading area and Columbarium and one mobile concrete bollard at the Welcome Center entrance on Memorial Avenue.

### **ALTERNATIVES CONSIDERED**

ANC considered three action alternatives that would meet the purpose of and need for the Proposed Action and a No Action Alternative. The action alternatives considered security fence construction options for Sections 52 and 53.

1. Under Alternative 1, the security fence would be constructed of 8-foot-tall steel pickets and posts. It would be placed on the outside of the existing masonry wall. Placement would allow enough space from the wall for vegetation maintenance and removal of leaves and debris.
2. Under Alternative 2, the security fence would be constructed of a 4-foot-tall, high-strength steel fence topper atop the existing masonry wall at Sections 52 and 53. This would bring the overall height of the wall and fence combined to 8 feet.
3. Alternative 3 would be the same as described for Alternative 1 except that the fence along the masonry wall would be placed as close as possible to the wall instead of allowing space for maintenance.
4. Under the No Action Alternative, the Proposed Action would not occur. As required by NEPA, the No Action Alternative is analyzed in this EA and will be used to consider the consequences of not implementing the Proposed Action.

During the preparation of this EA, the Army, due to security concerns and after considering all alternatives, proceeded with the Alternative 2 option for Sections 52 and 53. The Army completed a Record of Environmental Consideration (Categorical Exclusion) and consulted with the Virginia Department of Historic Resources (DHR) prior to proceeding. The EA includes an analysis of this project to capture the cumulative impacts of multiple security upgrades.

### **SUMMARY OF ENVIRONMENTAL RESOURCES EVALUATED IN THE ENVIRONMENTAL ASSESSMENT**

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This EA includes analysis of all potentially relevant environmental resource areas. Two resource areas selected for detailed analysis include cultural resources and air quality. As a result of the potential impacts and to address compliance with the National Historic Preservation Act (NHPA) and the Clean Air Act, respectively, the EA includes detailed analysis of these two resources.

Potential impacts to the following resource areas are considered to be negligible or absent: water resources, geological resources, biological resources, utilities, infrastructure, land use, and the surrounding community. Therefore, the EA does not include a detailed analysis of these resource areas.

### **SUMMARY OF POTENTIAL ENVIRONMENTAL CONSEQUENCES OF THE ACTION ALTERNATIVES AND MAJOR MITIGATING ACTIONS CULTURAL RESOURCES**

**No Action Alternative:** The No Action Alternative would have no effects to cultural resources. A room retrofit in the Welcome Center to create a flexible operations center, upgrades to ANC boundary fencing, and bollard and barrier upgrades would not be required.

**Alternatives 1, 2, and 3:** The memorandum of agreement with JBM-HH to provide security screening would be an administrative action that would have no effects on historic properties at ANC. The refitting of a room within the Welcome Center for use as a FLEXOPS would primarily consist of electrical wiring and the installation of interior electronics, which are allowed under the conditions of ANC's Programmatic Agreement with the Virginia State Historic Preservation Officer. The Programmatic Agreement streamlines NHPA Section 106 consultation for routine operation, maintenance, and repair activities at ANC.

No adverse impacts to the Arlington National Cemetery Historic District, the Memorial Amphitheater Historic District, or the Arlington Ridge Park Historic District are anticipated from the proposed fence and boundary wall upgrades or the bollard and barrier upgrades.

Under any of the action alternatives, impacts to archaeological resources are not anticipated. All construction would occur in portions of the area of potential effects that either was surveyed and found not to contain archaeological resources or was disturbed through prior development of the cemetery or adjacent infrastructure. The finding of previously undiscovered cultural resources is also not expected.

### **AIR QUALITY**

**No Action Alternative:** Under the No Action Alternative, the security upgrades at ANC would not occur, nor would any changes to air emissions-generating activities at ANC. Air emissions would remain at current baseline levels, and there would be no impact to air quality in the region of influence.

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**Alternatives 1, 2, and 3:** Emissions associated with security upgrades at ANC would not generate significant quantities of any pollutants. Furthermore, these emissions would be temporary, only lasting the duration of the upgrading construction process. Once completed, emissions would return to baseline levels. Therefore, these alternatives would not have significant impacts to air quality.

**PUBLIC INVOLVEMENT**

CEQ regulations direct federal agencies to involve the public in preparing and implementing their NEPA procedures. ANC provided members of the public and interested parties with an opportunity to review and comment on the Proposed Action at an open house public meeting on May 3, 2022. ANC did not receive any comments from the public at the meeting and received one comment from an interested party during the public comment period. The Final EA incorporated and addressed the comment, which suggested the EA affirm that the current and future planned use of the ANC Welcome Center would be to provide for visitor services and amenities and any other use would not displace or eliminate these services.

ANC consulted with the Virginia DHR in accordance with Section 106 of the NHPA and with the Virginia Department of Environmental Quality in accordance with the Coastal Zone Management Act. The Virginia DHR concurred that the Proposed Action will have an effect on cultural resources at ANC, but the effect will not be adverse. The Virginia Department of Environmental Quality concurred with ANC's determination that the Proposed Action would be consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Management Program.

**FINDING OF NO SIGNIFICANT IMPACT**

Based on the information and analyses contained in the EA as well as the discussion contained herein, I find that the implementation of any of the three action alternatives for the Proposed Action will have no significant impact on the human environment. Pursuant to 40 CFR Part 1501.3 regulations implementing the procedural provisions of NEPA, an Environmental Impact Statement will not be prepared. The signing of this Finding of No Significant Impact completes ANC's NEPA process.

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Ms. Karen Durham-Aguilera  
Executive Director

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Date