



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
**NORFOLK DISTRICT CORPS OF ENGINEERS**  
**FORT NORFOLK 803 FRONT STREET**  
**NORFOLK, VIRGINIA 23510-1096**

June 5, 2012

Planning and Policy Branch

Mr. Marc Holma  
Department of Historic Resources  
Office of Review and Compliance  
2801 Kensington Avenue  
Richmond, VA 23221

Dear Mr. Holma,

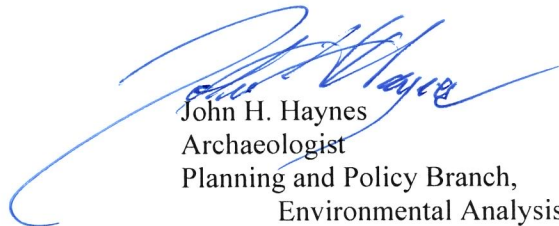
Please find enclosed a brief consultation report discussing the effects of the Marker Removal, Section 29 Arlington National Cemetery (DHR file # 2012-0390) on historic resources, as well as a paper copy of an earlier reconnaissance report related to this project which was submitted electronically.

The earlier report, "Reconnaissance of Marker Drains and Footbridges in Section 29 of Arlington National Cemetery/Arlington House," recommended that landscape features constructed of grave markers in the stream drainage of Section 29 of Arlington National Cemetery and eastern areas of the National Park Service Arlington House property were not National Register of Historic Places eligible, nor contributing to either the Arlington National Cemetery historic district, or to Arlington House.

The new report, "Additional Section 106 Consultation for Marker Removal (Stream Restoration) Section 29, Arlington National Cemetery/Arlington House, the Robert E. Lee Memorial (DHR file# 2012-0390)" supplies further details concerning the proposed undertaking, and the potential effects of the undertaking on archaeological resources. It recommends that the proposed undertaking would result in no adverse effects to historic properties.

Copies of this letter and the enclosures have been furnished to Daniel Delahaye, Army National Cemeteries Program and Mathew Virta, National Park Service. If you should have any questions do not hesitate to email me at [John.H.Haynes@usace.army.mil](mailto:John.H.Haynes@usace.army.mil) or call at (757) 201-7008.

Sincerely,



John H. Haynes  
Archaeologist  
Planning and Policy Branch,  
Environmental Analysis Section

Enclosures



# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

Douglas W. Domenech  
*Secretary of Natural Resources*

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick  
*Director*

Tel: (804) 367-2323  
Fax: (804) 367-2391  
TDD: (804) 367-2386  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

12 June 2012

Colonel Victoria M. Bruzese  
Department of the Army  
Arlington National Cemetery  
Arlington, Virginia 22211-5003

Re: Removal of markers used as stream bank stabilization at Arlington National Cemetery  
Arlington County, Virginia  
DHR File # 2012-0390

Dear Colonel Bruzese:

The Department of Historic Resources (DHR) has received for our review and comment the above referenced project. It is our understanding that Arlington National Cemetery (ANC) proposes to remove markers that were used for stream bank stabilization in Section 29. We concur with ANC that the markers are not eligible for listing in the National Register of Historic Places (NRHP) and that their removal will have No Adverse Effect on historic properties listed in or eligible for the NRHP.

If you have any questions about our comments, please call me at (804) 482-6090.

Sincerely,

Marc Holma, Architectural Historian  
Office of Review and Compliance

C: Mr. John Haynes, Army Corps of Engineers  
Superintendent Matthew Virta, George Washington Memorial Parkway, NPS

Administrative Services  
10 Courthouse Ave.  
Petersburg, VA 23803  
Tel: (804) 862-6416  
Fax: (804) 862-6196

Capital Region Office  
2801 Kensington Office  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

Tidewater Region Office  
14415 Old Courthouse Way 2<sup>nd</sup>  
Floor  
Newport News, VA 23608  
Tel: (757) 886-2807  
Fax: (757) 886-2808

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5428  
Fax: (540) 387-5446

Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7031  
Fax: (540) 868-7033

**From:** [Holma, Marc \(DHR\)](#)  
**To:** [Haynes, John H. NAO](#)  
**Subject:** NR eligibility of headstones along streambed (2012-0390)  
**Date:** Tuesday, May 15, 2012 11:24:39 AM

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John,

In response to your earlier emails, DHR does not believe these headstones to be eligible for the National Register of Historic Places.

Sincerely,

Marc Holma

**From:** Haynes, John H. NAO  
**To:** ["Holma, Marc \(DHR\)"; Matthew Virta \(matthew\\_virta@nps.gov\); Brandon Bies \(brandon\\_bies@nps.gov\)](#)  
**Cc:** [Sydnor, Cara Y NAO; Conner, Susan L. NAO; Delahaye, Daniel B Mr CIV USA ANC/POG OSA; Smith, Adam ERDC-CERL-IL; Tooker, Megan W ERDC-CERL-IL](#)  
**Subject:** Reconnaissance Report on Arlington National Cemetery Section 29 Stream Restoration Project DHR #2012-0390 (UNCLASSIFIED)  
**Date:** Friday, April 06, 2012 12:04:00 PM

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Classification: UNCLASSIFIED  
Caveats: NONE

The report documents drainage features and footbridges constructed of tombstones in Arlington National Cemetery Section 29, which planned to be removed as a part of the stream restoration project, and recommends that they are not contributing to the Arlington National Cemetery historic district due to a lack of architectural integrity.

The file is 4MB and has been sent to Mr. Holma via the Virginia State Government file share site. If others receiving this email want a copy of the report contact me and indicate a means of receiving the file (i.e., can accept through email, ftp site, or mail disc).

V/r

John H. Haynes  
Archaeologist  
US Army Corps of Engineers,  
Norfolk District (NAO)  
803 Front Street  
Norfolk, VA 23510  
757-201-7008  
fax 757-201-7646  
[john.h.haynes@usace.army.mil](mailto:john.h.haynes@usace.army.mil)

Classification: UNCLASSIFIED  
Caveats: NONE

**From:** Haynes, John H. NAO  
**To:** [Matthew Virta \(matthew\\_virta@nps.gov\)](mailto:matthew_virta@nps.gov); [Brandon Bies \(brandon\\_bies@nps.gov\)](mailto:brandon_bies@nps.gov)  
**Subject:** FW: Determination of eligibility, prehistoric components Loci 1, 2, and 3 of 44AR0032; DHR file # 2008-1022 (UNCLASSIFIED)  
**Date:** Friday, April 06, 2012 7:52:00 AM  
**Attachments:** [Archaeological sections of Millis et al 1998.pdf](#)

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Classification: UNCLASSIFIED  
Caveats: NONE

Matt, Brandon,

My apologies for not copying NPS on this email at the time it was sent, but it does allow me to add an update.

The site identified on the south end of the Ft. Myer picnic area has been assigned DHR site #44AR0046, and we are in the process of contracting for a Phase II investigation at the site. I recently found a high resolution 1949 aerial which shows a small building at exact location of the architectural artifacts recovered (generally dating to the first half of the 20th century or slightly earlier); the other component of the site was a layer of fire-cracked rock and dark soil 13 cm below soil surface, beneath a thin layer of light colored loamy sand. No artifacts were in association with this feature.

The metal detector survey conducted 27-29 March did not identify any new sites. An isolated wrought nail north of the Maintenance Yard north of Loci 3 of 44AR0032 was the only clearly pre-20th century artifact identified. Surface inspection at Loci 1 of 44AR0032 reinforced my assessment of that site, discussed below. There is substantial surface exposure at the south end of the site, the area of highest density reported in Mills et al 1998. Artifacts visible on the surface were few, and consisted of shatter and cobble/core fragments, and no flakes or bifaces. I did not take a collection. The large numbers of naturally occurring stones exposed in that area indicates soil loss.

I am attaching the pertinent sections of the 1998 report. We have the entire report in pdf format, but it is 33mb. I can burn a copy to disk and mail it to you if you would like.

Regards,

John

John H. Haynes  
Archaeologist  
US Army Corps of Engineers,  
Norfolk District (NAO)  
803 Front Street  
Norfolk, VA 23510  
757-201-7008  
fax 757-201-7646  
[john.h.haynes@usace.army.mil](mailto:john.h.haynes@usace.army.mil)

-----Original Message-----

From: Haynes, John H. NAO  
Sent: Thursday, March 22, 2012 2:31 PM  
To: [marc.holma@dhr.virginia.gov](mailto:marc.holma@dhr.virginia.gov); [brad.mcdonald@dhr.virginia.gov](mailto:brad.mcdonald@dhr.virginia.gov); [Ethel.Eaton@dhr.virginia.gov](mailto:Ethel.Eaton@dhr.virginia.gov)  
Cc: Conner, Susan L. NAO; Neitzke, Laurie D. NAO; Hegge, Greg E NAO; Delahaye, Daniel B Mr CIV USA ANC/POG OSA  
Subject: Determination of eligibility, prehistoric components Loci 1, 2, and 3 of 44AR0032; DHR file #

2008-1022 (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Marc, Ethel, Brad,

As I'd brought up briefly we are working on identification of properties for the Arlington National Cemetery Millennium project. Prior DHR comment (letter from Marc Holma to John Metzler dated 29 July 2009) discussed potentially contributing landscape elements, and Phase II investigation of a site at the Ft. Myer Picnic area, later recorded as 44AR0043, tested at the Phase II level and determined ineligible (letter from Marc Holma to John Metzler dated 1 April 2010).

In reviewing the past work on the area, I found that no Phase I survey had been done on the south half of the Ft. Myer picnic area. The north half had been surveyed under Jay Custer in 1991, and a site identified later identified as 44AR0043. I conducted Phase I survey last week on the south part of the Ft. Myer picnic area and identified a site with potential NRHP eligibility, along with supplemental metal detector survey. I intend to undertake further metal detector survey in other portions of the Millennium Project area next week. The results of the Phase I survey, supplemental metal detector survey, and historical research focused on the Civil War era will be included in a forthcoming report which shall discuss their findings along with other cultural resources which might be affected by the Millennium Project.

As we expect to be contracting for a Phase II excavation at the newly identified site (temporary designation FMS1, DSS form and mapping submitted 3/21) and perhaps others pending further fieldwork, we wish to get a determination on Loci 1, 2, and 3 of 44AR0032 which we recommend as no further work. If DHR believes further work is warranted at these sites, it would be helpful know this before scoping the Phase II work at FMS1, so that other work could be included.

Shovel tests pits and 1x1 meter units excavated at 44AR0032 Loci 1, 2, and 3 yielded no evidence of stratigraphy either cultural or natural, and no features. There is a low diversity of artifacts at these sites, and no diagnostic artifacts were recovered. There is a moderate density of artifacts, which for this type of site is relatively low. There are literally thousands of sites of this type, often referred to as 'lithic scatters,' recorded in northern Virginia. The evidence at these locations suggests sporadic use of lithic material occurring at these locations, quartz and quartzite cobbles, for the production of expedient tools. This activity was most likely embedded in hunting and gathering activities, and travel to the locations was probably not solely for lithic extraction.

There is no basis for the boundary of 44AR0032 in archaeological data. The results of the Phase I and II survey conducted in 1997-1998 (Millis et al. 1998) identified six loci within the tract owned by the National Park Service (NPS). NPS land tenure, not historic or archaeological data defines the boundaries of 44AR0032. Five of the six loci are contiguous, and 44AR0032 should be considered four sites, three prehistoric and one multicomponent. Even in the report finds outside the loci are referred to as non-site finds, even though they came from within the boundary of 44AR0032. Here is a summary of our recommendations regarding the sites included in 44AR0032.

Outside of Millennium APE

44AR0032A

Locus 4 – Artifacts, cultural stratigraphy, and features 19th-20th century associated with Arlington House: eligible, overlaps Locus 5

Locus 5 – Dispersed distribution of prehistoric artifacts, 1 steatite sherd (Late Archaic-Middle Woodland) as diagnostic, no features or stratigraphy: ineligible, however coterminous with Locus 4

Locus 6 – Concentration of prehistoric artifacts, focused quarry area, feature identified: eligible, borders Locus 4/5

Within or bordering the Millennium APE

44AR0032B

Locus 1 – Lithic scatter, no stratigraphy, no diagnostic artifacts, no features: ineligible, separated by a

deep stream cut from Locus 2, and distance from other Loci

44AR0032C

Locus 2 – Lithic scatter, no stratigraphy, no diagnostic artifacts, no features: ineligible

44AR0032D

Locus 3 – Lithic scatter, no stratigraphy, no diagnostic artifacts, no features, eroded landform: ineligible

For your conveniences and for my marginal notes, I am attaching archaeological sections of the report "Cultural Resource Investigations at Section 29 at Arlington House, The Robert E. Lee Memorial, Arlington County, Virginia" Heather Millis, Jeff Holland, Todd Cleveland, and Bill Nethery; Garrow and Associates, Inc.; Chapel Hill, North Carolina; 1998.

Regards,

John

John H. Haynes  
Archaeologist  
US Army Corps of Engineers,  
Norfolk District (NAO)  
803 Front Street  
Norfolk, VA 23510  
757-201-7008  
fax 757-201-7646  
john.h.haynes@usace.army.mil

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