



April 27, 2016

Ethel Eaton
Senior Policy Analyst
Division of Resource Services and Review
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Section 106 VASHPO Consultation on the Kennedy Center Expansion Connection Project

Dear Ms. Eaton,

The National Capital Planning Commission (NCPC) and National Park Service (NPS) are acting as colead agencies in cooperation with the John F. Kennedy Center for the Performing Arts (Kennedy Center) on the Kennedy Center Expansion Connection Project. On February 17, 2016, NCPC and NPS initiated consultation with the Virginia State Historic Preservation Office (VASHPO) for this project in compliance with Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and its implementing regulations (36 CFR Part 800.3).

As described in previous correspondence, the purpose of the proposed Kennedy Center Expansion Connection Project is to provide a safe pedestrian and bicycle connection that would create a public waterfront link and would improve access to and from the Kennedy Center, the National Mall and Memorial Parks (NAMA), the Rock Creek Multi-Use Trail, the Potomac River waterfront, and the surrounding vicinity. The project area partially falls within the Rock Creek and Potomac Parkway, which is under the jurisdiction of the National Park Service. NCPC is reviewing the project under its authorities in the National Capital Planning Act, and an approval action by NCPC is considered an undertaking subject to Section 106.

In accordance with the requirements of Section 106, an Assessment of Effects (AOE) report was prepared in order to consider and document potential effects of the project on historic properties. A draft of the AOE report dated February 18, 2016, was submitted to the VASHPO for review on March 2, 2016. Thank you for your thoughtful review of the draft report and for your letter of March 21, 2016, offering preliminary comments. In response, we'd would like to present the following clarifications:

Area of Potential Effects. A draft Area or Potential Effects (APE) was identified by NPS and NCPC through consultation with the DCHPO and other consulting parties and was presented for public comment during a joint NEPA/Section 106 public scoping meeting on September 29, 2015, and during a Section 106 consulting parties meeting on December 10, 2015. The APE was illustrated in a map included as Figure 6 in the draft AOE. As a point of clarification, this map illustrated the boundary of the APE using a solid black line, and the brown line represented the boundaries of the Memorial Avenue Corridor. As such, the APE does not include the "blade," which is part of the of the Memorial Avenue Corridor, nor

does it include the Arlington Memorial Cemetery Hemicycle. To clarify this issue, the APE map will be revised to more clearly differentiate between the APE boundary and the boundaries of various resources. (See enclosures.) The viewshed analysis indicates that the Kennedy Center Expansion Connection project area would not be visible from the Arlington Memorial Cemetery Hemicycle; therefore, this resource is not included in the APE. (See enclosures.) Lastly, in response to the request for clarification regarding the images in the AOE taken from the Virginia side of the Potomac River, the locations and directions will be clearly described in the photo captions.

Identification of Historic Properties. Although the Arlington Memorial Cemetery Hemicycle is not within the APE (see above) parts of the Arlington National Cemetery Historic District are acknowledged to be within the boundaries of the APE. (Note: The V-CRIS entry for Arlington National Cemetery has not yet been updated to reflect the historic district boundary of the 2014 National Register documentation, which includes the Arlington Memorial Bridge and Memorial Avenue.) The APE map will therefore be revised and the AOE text will be updated to evaluate the potential effects of the Kennedy Center Expansion Connection Project on the Arlington National Cemetery Historic District. The viewshed analysis indicates that the project area would not be visible from the Arlington House, The Robert E. Lee Memorial. (See enclosures.) In addition, preliminary analysis indicates that the alternatives under consideration for the proposed project would either not be visible or would insignificantly alter existing views from the Arlington National Cemetery Historic District. Contributing views of the historic district, including the view from the Arlington House, The Robert E. Lee Memorial, the view along Memorial Avenue and the Arlington Memorial Bridge to the Lincoln Memorial and the reciprocal view west towards the cemetery, and panoramic views from points along Arlington Ridge to the monumental core and other landmarks of the surrounding area, would also not be affected.

Consulting Parties. Thank you for your input into the identification of consulting parties for the Kennedy Center Expansion Connection project. The following organizations will be included in consultation: Arlington County, Arlington Historical Society, and Arlington National Cemetery. In addition, NCPC and NPS are initiating invitations for tribal consultation with the Pamunkey Tribe and the Catawba Indian Nation.

A revised AOE report is being prepared to comprehensively address all comments and will be circulated to the consulting parties for final review. On behalf of NCPC and NPS, thanks again for your participation in consultation on the Kennedy Center Expansion Connection Project. If you have any questions, please do not hesitate to contact Kathy Kruse, Vice President for Institutional Affairs, at kkruse@kennedy-center.org or by phone at (202) 416-8703.

Sincerely,

Gay Vietzke
Superintendent

National Mall and Memorial Parks

Marcel Acosta

**Executive Director** 

**National Capital Planning Commission** 

Enclosures

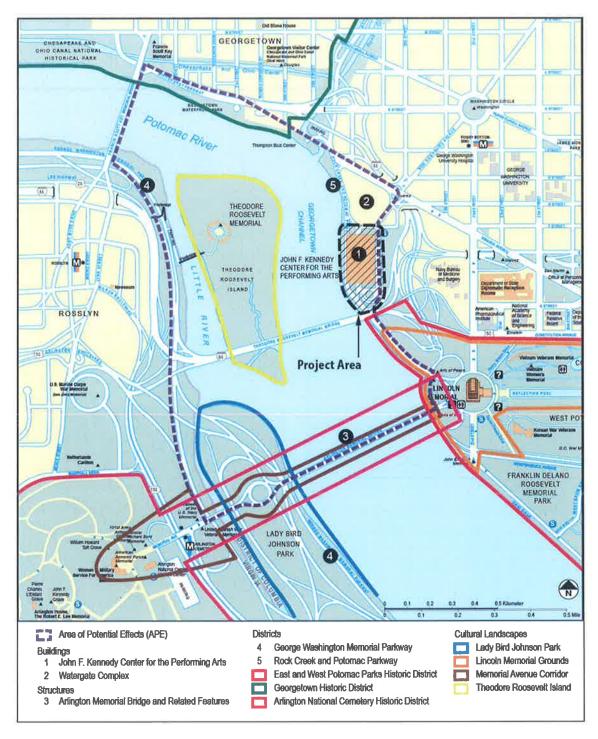


Figure 1: Revised Area of Potential Effects (APE) map illustrating the APE in a dashed purple line. Note that the APE excludes the "blade" of the Memorial Avenue Corridor (brown), but includes a section of the Arlington National Cemetery Historic District (pink).



Figure 2: View towards the Kennedy Center (circled in red) looking northeast from the Arlington House, The Robert E. Lee Monument, within the Arlington National Cemetery Historic District. Due to sightlines and distances, the proposed project area along the Rock Creek and Potomac Parkway would not be visible from the Arlington House.



Figure 3: View towards the Kennedy Center looking northeast from the Arlington Memorial Cemetery Hemicycle within the Arlington National Cemetery Historic District. The proposed project area would not be visible from the hemicycle.