

APPENDIX A: RELEVANT CORRESPONDENCE

This page intentionally left blank.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Virginia Ecological Services Field Office
6669 SHORT LANE
GLOUCESTER, VA 23061
PHONE: (804)693-6694 FAX: (804)693-9032
URL: www.fws.gov/northeast/virginiafield/

Consultation Code: 05E2VA00-2015-SLI-1721

April 17, 2015

Event Code: 05E2VA00-2015-E-01725

Project Name: Arlington House Rehabilitation

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: Arlington House Rehabilitation

Official Species List

Provided by:

Virginia Ecological Services Field Office

6669 SHORT LANE

GLOUCESTER, VA 23061

(804) 693-6694

<http://www.fws.gov/northeast/virginiafield/>

Consultation Code: 05E2VA00-2015-SLI-1721

Event Code: 05E2VA00-2015-E-01725

Project Type: ** Other **

Project Name: Arlington House Rehabilitation

Project Description: Rehabilitation of Arlington House

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



United States Department of Interior
Fish and Wildlife Service

Project name: Arlington House Rehabilitation

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-77.0733064 38.8820184, -77.0722496 38.8820101, -77.0723304 38.880081, -77.0734405 38.8800349, -77.0733064 38.8820184)))

Project Counties: Arlington, VA



United States Department of Interior
Fish and Wildlife Service

Project name: Arlington House Rehabilitation

Endangered Species Act Species List

There are a total of 0 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

There are no listed species identified for the vicinity of your project.



United States Department of Interior
Fish and Wildlife Service

Project name: Arlington House Rehabilitation

Critical habitats that lie within your project area

There are no critical habitats within your project area.



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

Katry Harris
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

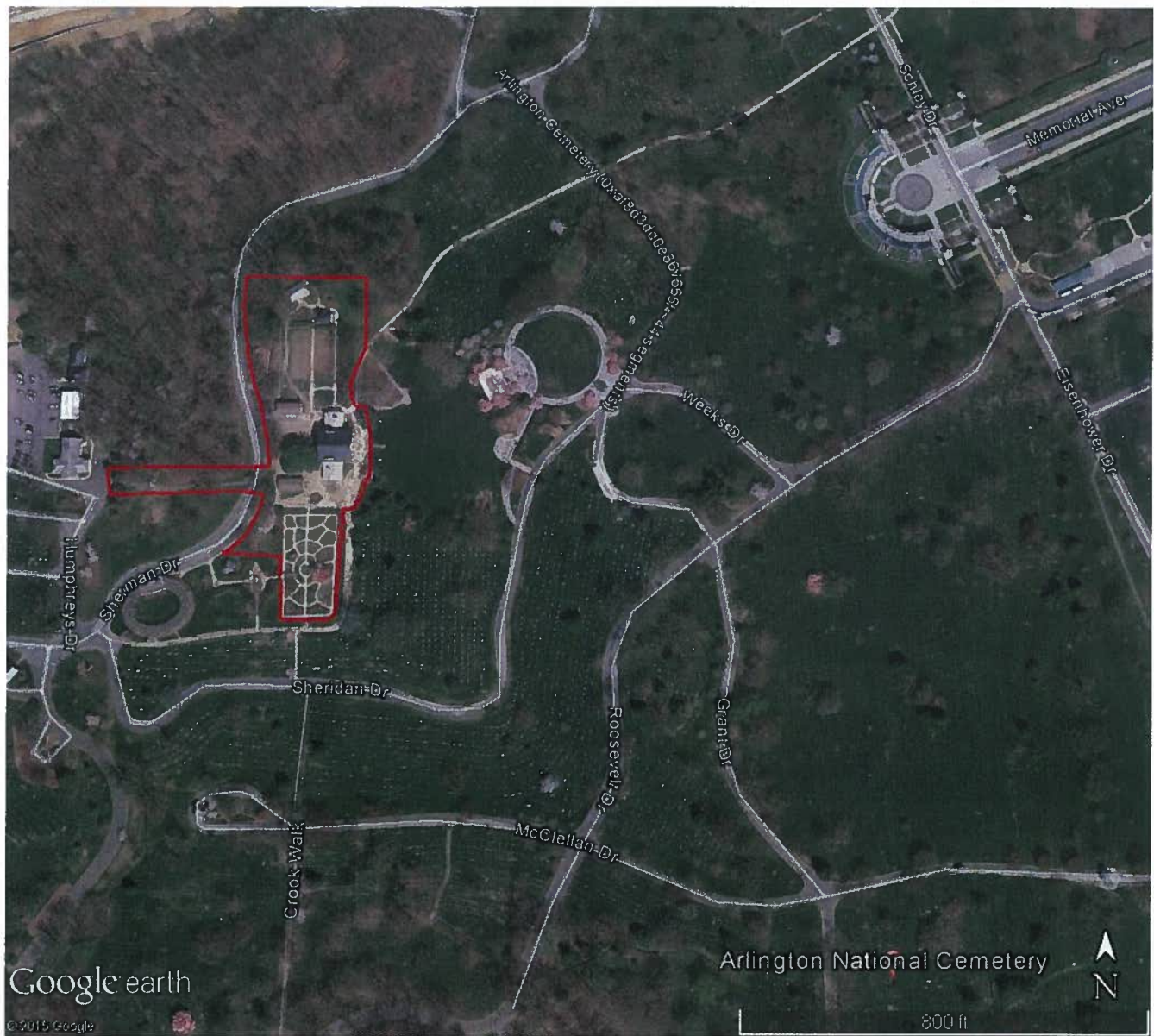
Dear Ms. Harris:

The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion include: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area and Area of Potential Effect are shown on the attached figures.

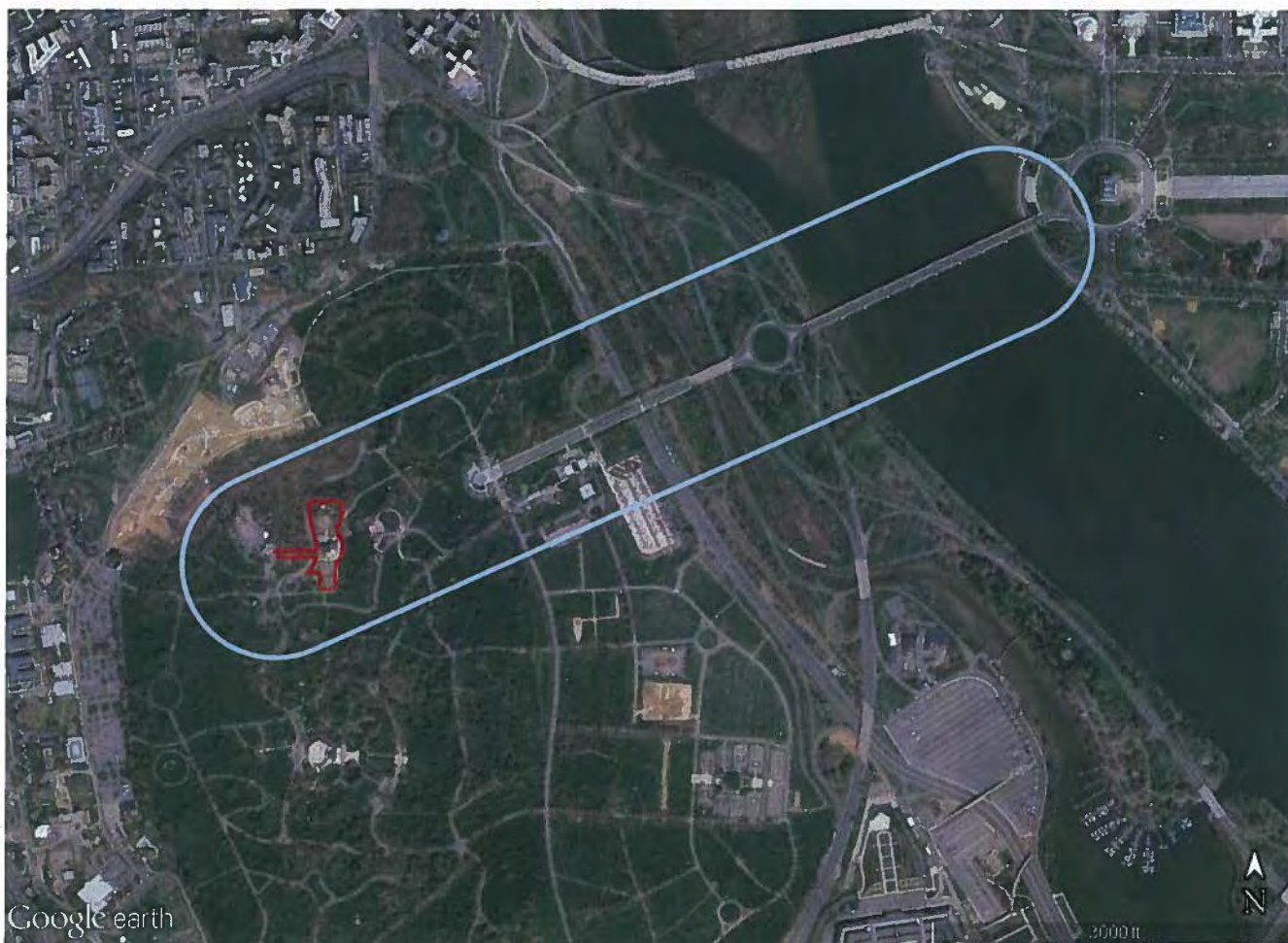
To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. The EA will include an assessment of cultural resources potentially affected by the proposed action consistent with provisions of the National Historic Preservation Act (NHPA) of 1966 (as amended), as applicable. Full NHPA Section 106 compliance will be conducted by the GWMP separately from but concurrent with the EA. This letter serves as notification that the NPS-GWMP is initiating NHPA Section 106 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016. We also invite the Advisory Council on Historic Preservation (ACHP) to participate in this process and request a reply from ACHP indicating their interest.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at

<http://parkplanning.nps.gov/gwmp>



Project Area



Area of Potential Effect

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,

Alexcy Romero
Superintendent, George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

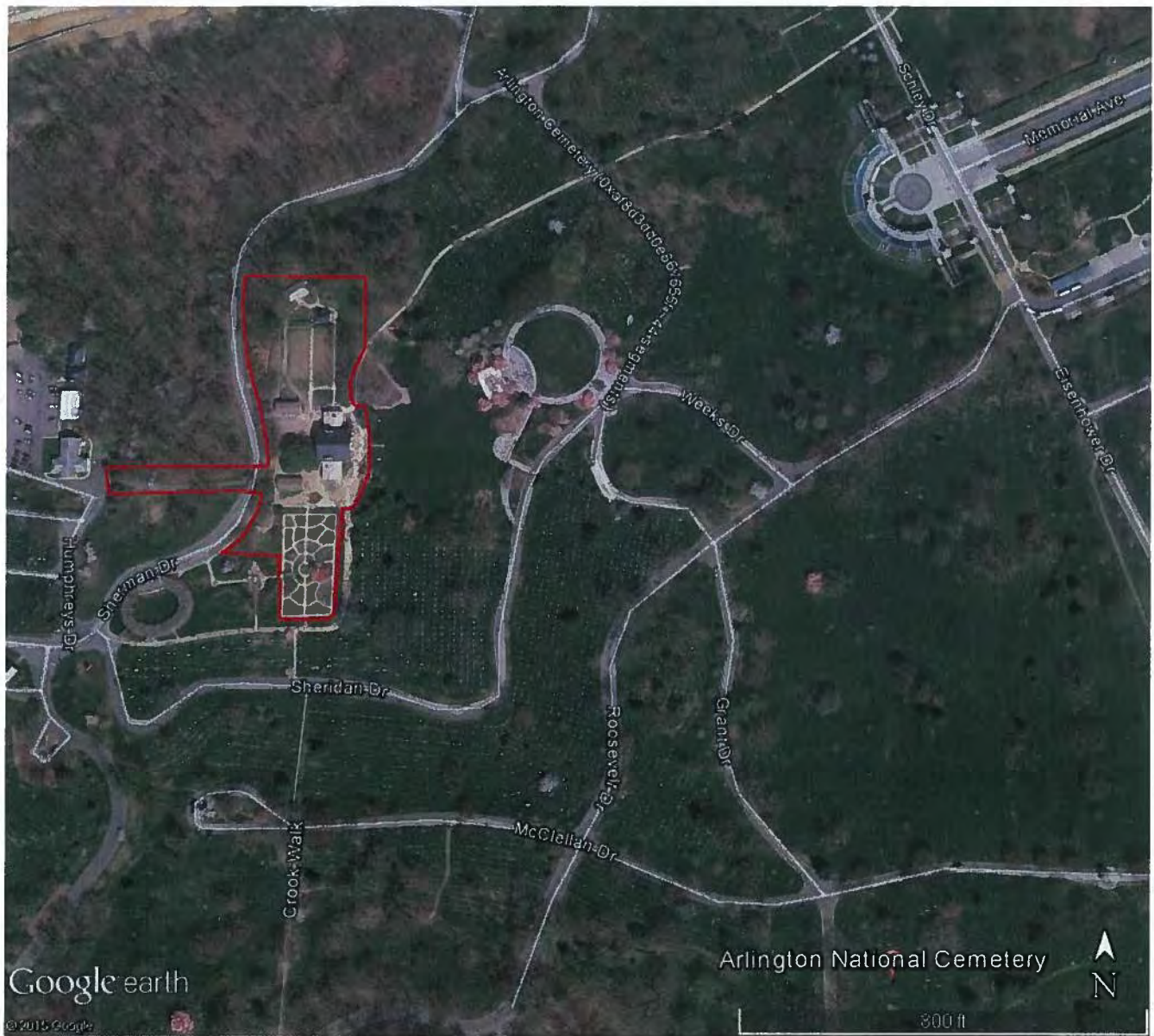
Mr. Patrick Hallinan
Executive Director
Army National Military Cemeteries
Arlington National Cemetery
Arlington, VA 22211

Dear Mr. Hallinan:

The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion include: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area and Area of Potential Effect are shown on the attached figures.

To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. The EA will include an assessment of cultural resources potentially affected by the proposed action consistent with provisions of the National Historic Preservation Act (NHPA) of 1966 (as amended), as applicable. Full NHPA Section 106 compliance will be conducted by the GWMP separately from but concurrent with the EA. This letter serves as notification that the NPS-GWMP is initiating NHPA Section 106 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/gwmp>.



Project Area



Area of Potential Effect

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alexcy Romero'.

Alexcy Romero

Superintendent, George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

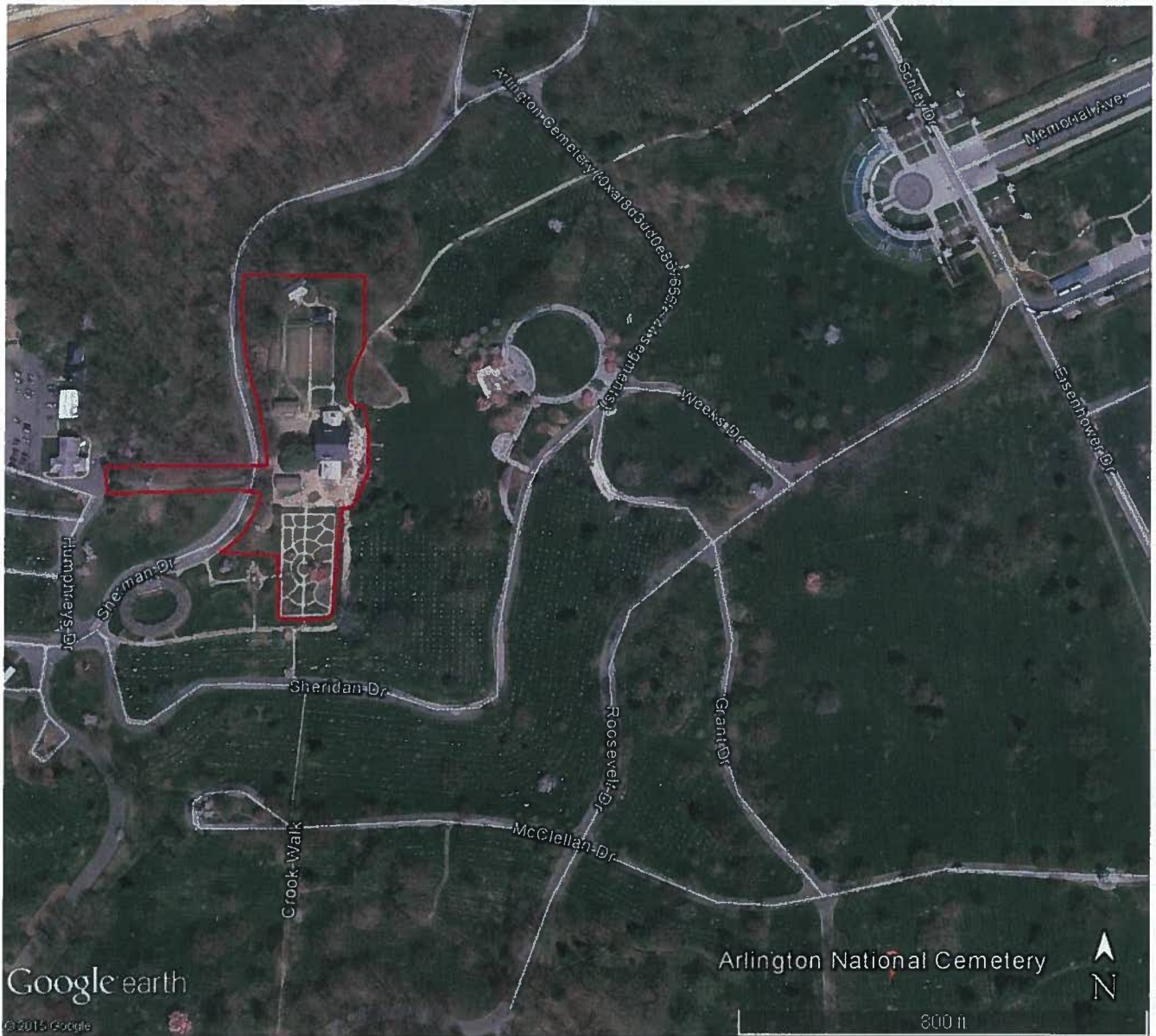
Mr. Thomas Luebke
Secretary
US Commission of Fine Arts
401 F Street NW, Suite 312
Washington, DC 20001-2728

Dear Mr. Luebke:

The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion include: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area and Area of Potential Effect are shown on the attached figures.

To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. The EA will include an assessment of cultural resources potentially affected by the proposed action consistent with provisions of the National Historic Preservation Act (NHPA) of 1966 (as amended), as applicable. Full NHPA Section 106 compliance will be conducted by the GWMP separately from but concurrent with the EA. This letter serves as notification that the NPS-GWMP is initiating NHPA Section 106 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/gwmp>.



Project Area



Area of Potential Effect

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,

Alexcy Romero
Superintendent, George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

Christine Saum
Director
Urban Design and Plan Review Division
National Capital Planning Commission
401 9th Street, Suite 500
Washington, DC 20004

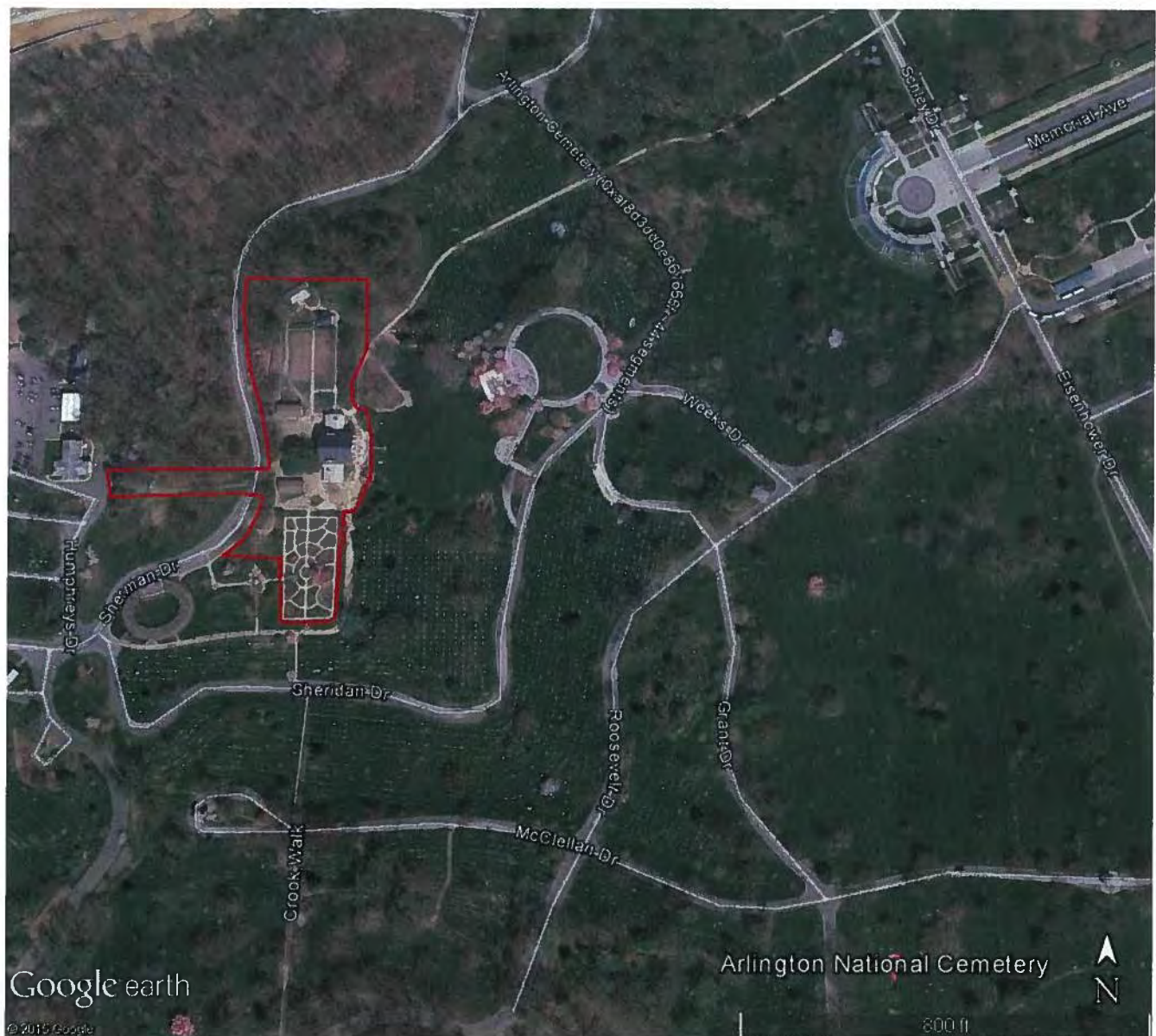
Dear Ms. Saum:

The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion include: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area and Area of Potential Effect are shown on the attached figures.

To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. The EA will include an assessment of cultural resources potentially affected by the proposed action consistent with provisions of the National Historic Preservation Act (NHPA) of 1966 (as amended), as applicable. Full NHPA Section 106 compliance will be conducted by the GWMP separately from but concurrent with the EA. This letter serves as notification that the NPS-GWMP is initiating NHPA Section 106 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at

<http://parkplanning.nps.gov/gwmp>.



Project Area



Area of Potential Effect

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,

A handwritten signature in blue ink, which appears to read "Alexcy Romero". The signature is stylized with a large, sweeping initial "A".

Alexcy Romero
Superintendent, George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

Mr. Leopoldo Miranda
U.S. Fish and Wildlife Service
177 Admiral Cochrane Drive
Annapolis, MD 21401

Dear Mr. Miranda:

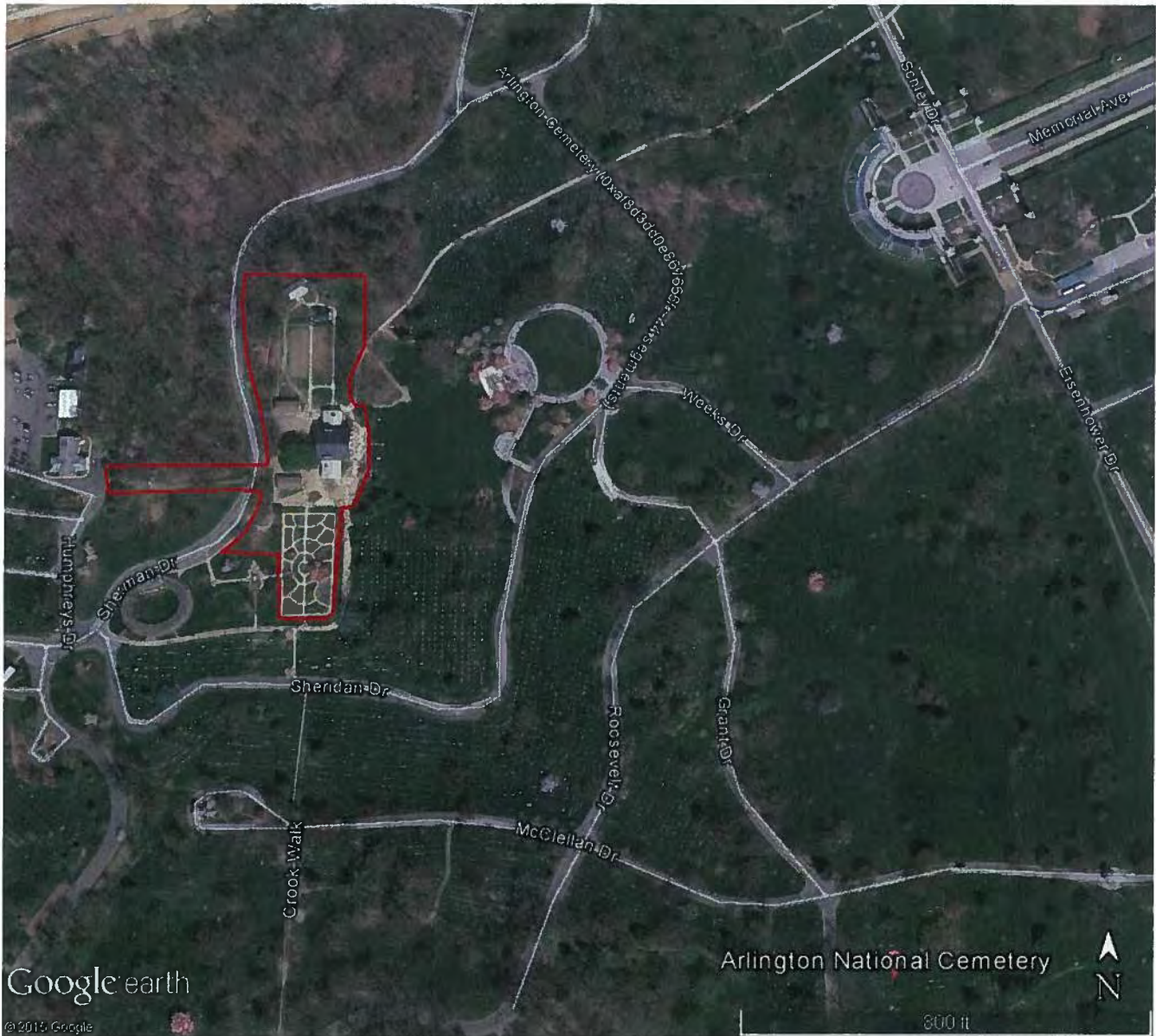
The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion includes: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area is shown on the attached figure.

To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. This letter serves as notification that the NPS-GWMP is initiating Endangered Species Act, as amended Section 7 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016.

During these initial stages, the NPS has initiated preliminary data gathering efforts. An IPaC report (attached) lists 20 species of migratory birds of conservation concern that may occur in the project area. A review by the NPS Natural Resources Project Manager determined that of that list, only the following five are likely to occur in the project area: Bald Eagle (*Haliaeetus leucocephalus*), Fox Sparrow (*Passerella iliaca*), Rusty Blackbird (*Euphagus carolinus*), Wood Thrush (*Hylocichla mustelina*), and Worm Eating Warbler (*Helmitheros vermivorum*). This letter is a formal request for additional information your agency may have concerning federal and state rare, threatened, and endangered species documented or reasonably

suspected within the vicinity of George Washington Memorial Parkway. We have also contacted the USFWS with a similar request.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/gwmp>.



Project Area Map

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,


Alexcy Romero

Superintendent, George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

Mr. Robert Lee Walker
VA Department of Game and Inland Fisheries
4010 W. Broad Street
Richmond, VA 23230

Dear Mr. Walker:

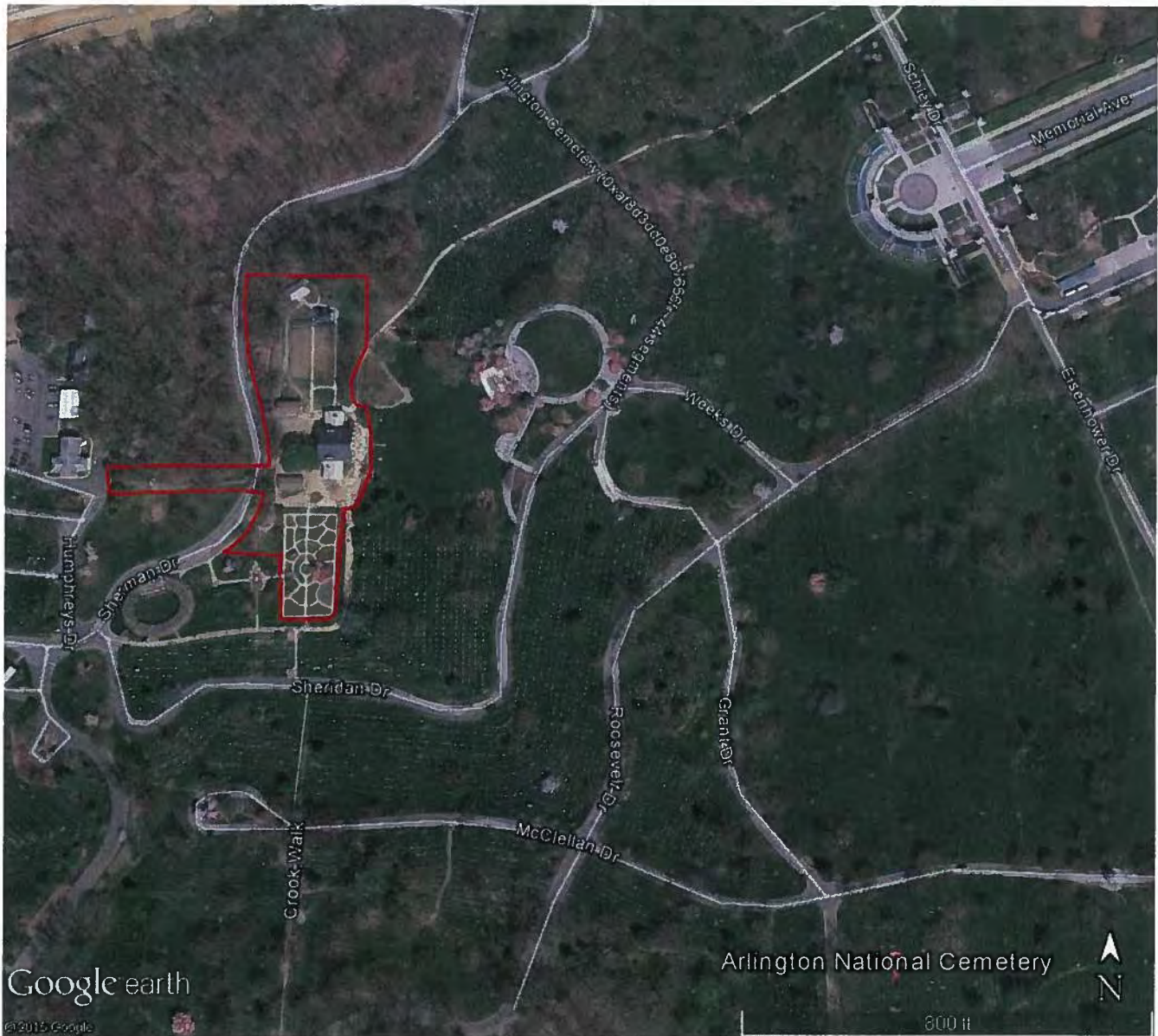
The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion includes: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area is shown on the attached figure.

To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. This letter serves as notification that the NPS-GWMP is initiating Endangered Species Act, as amended Section 7 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016.

During these initial stages, the NPS has initiated preliminary data gathering efforts. An IPaC report (attached) lists 20 species of migratory birds of conservation concern that may occur in the project area. A review by the NPS Natural Resources Project Manager determined that of that list, only the following five are likely to occur in the project area: Bald Eagle (*Haliaeetus leucocephalus*), Fox Sparrow (*Passerella iliaca*), Rusty Blackbird (*Euphagus carolinus*), Wood Thrush (*Hylocichla mustelina*), and Worm Eating Warbler (*Helmitheros vermivorum*). This letter is a formal request for additional information your agency may have concerning federal and state rare, threatened, and endangered species documented or reasonably

suspected within the vicinity of George Washington Memorial Parkway. We have also contacted the Virginia Department of Game and Inland Fisheries with a similar request.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/gwmp>.



Project Area Map

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alexcy Romero", with a stylized flourish extending from the end.

Alexcy Romero

Superintendent, George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

IN REPLY REFER TO:
H4217 (GWMP-ARHO)

October 09, 2015

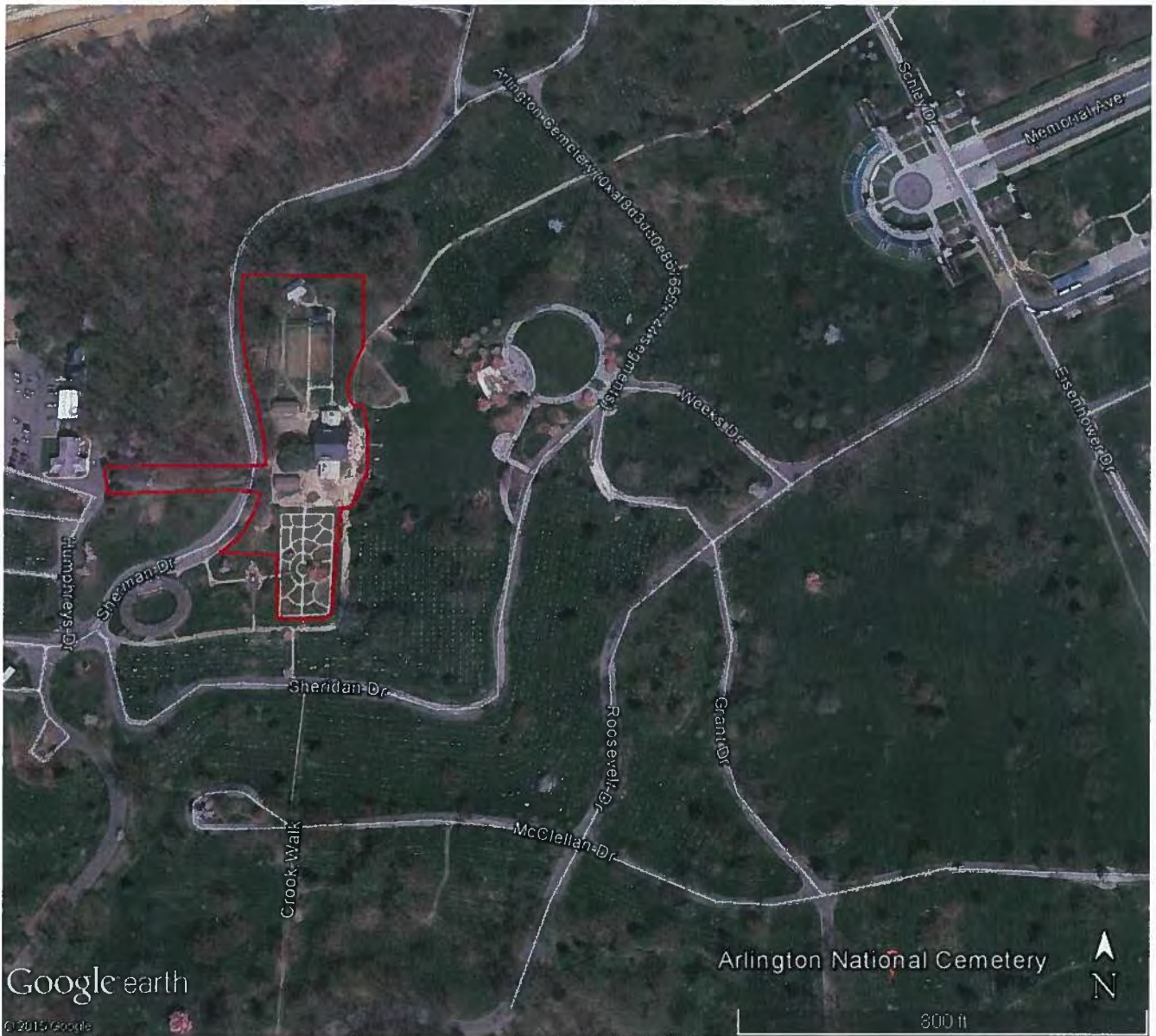
Ms. Julie Langan
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Langan:

The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the Rehabilitation of Arlington House, the Robert E. Lee Memorial, a site administered by the George Washington Memorial Parkway (GWMP). The purpose of this project is to continue efforts begun in 2007 for preservation treatments and rehabilitation of the historic Arlington House mansion, slave quarters, and surrounding grounds, as well as undertake additional preservation measures made possible by a generous donation by philanthropist David M. Rubenstein. Treatments of the mansion include: stabilization of the foundation; rehabilitation of the portico and entrance; restoration of exterior finishes and hardware; improvement of the climate management and fire suppression system; installation of new electrical, lighting, and security systems; and restoration of the conservatory. Site work outside of the mansion includes: restoration of the west room of the north slave quarters; rehabilitation of the south slave quarters; renovation of the existing museum and relocation of the bookstore; and restoration of the historic grounds and gardens. Additionally, an interpretive overlook may be added to Arlington Woods west of the mansion. The project area and Area of Potential Effect are shown on the attached figures.

To comply with the provisions of the National Environmental Policy Act (NEPA), the EA is being prepared to assess potential impacts on natural and cultural resources. The EA will include an assessment of cultural resources potentially affected by the proposed action consistent with provisions of the National Historic Preservation Act (NHPA) of 1966 (as amended), as applicable. Full NHPA Section 106 compliance will be conducted by the GWMP separately from but concurrent with the EA. This letter serves as notification that the NPS-GWMP is initiating NHPA Section 106 consultation, has begun the NEPA compliance process, and is proposing to have an EA available for public and regulatory review in the spring of 2016.

Between October 14 and November 13, 2015, the park is soliciting scoping comments from interested agencies, groups, and individuals. Information regarding the current status of this project is available through the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/gwmp>.



Project Area Map



Area of Potential Effect

We appreciate your initial input on this project and look forward to working with you as we move forward. If your office would like any additional information regarding this project, please contact Simone Monteleone, Chief of Resource Management for the George Washington Memorial Parkway, at 703-289-2512 or via email at simone_monteleone@nps.gov.

Sincerely,

 (FOR)

Alexcy Romero
Superintendent, George Washington Memorial Parkway

IN REPLY REFER TO:
NCPC File No. 7738

November 10, 2015

Mr. Alexcy Romero
Superintendent
Arlington House, The Robert E. Lee Memorial
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Re: Scoping Comments for the Environmental Assessment for Arlington House Rehabilitation

Dear Mr. Romero:

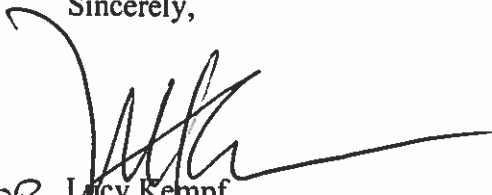
Thank you for the opportunity to provide scoping comments for the preparation of an Environmental Assessment (EA) on the Arlington House Rehabilitation. Arlington House, The Robert E. Lee Memorial, is listed in the National Register of Historic Places and is significant for its association with Robert E. Lee and as an example of early Greek Revival architecture. We understand that the current project builds on the efforts begun in 2007 to preserve and rehabilitate the Arlington House mansion, slave quarters, and surrounding grounds. The purpose of the current project is to preserve the mansion, adjacent slave quarters, and grounds; provide accessibility to the mansion; and improve visitor experience by adding wayfinding to welcome and orient visitors.

In anticipation of NCPC's review of the project, we request that the EA assess the potential direct, indirect, and cumulative impacts of the project on historic and cultural resources, visitor experience, vegetation, visual resources, and transportation/circulation. In particular, as NPS develops alternatives to address accessibility considerations at both the front portico and rear entry of Arlington House, adverse impacts on the historic property should be minimized to the greatest extent possible if they cannot be avoided. Along with the accessibility considerations, the location and design for the bookstore and any improvements to address pedestrian circulation should be sensitive to the landscape and setting of Arlington House. We understand that the National Park Service intends to conduct Section 106 compliance separately from the EA, and we look forward to participating in that process to gain a better understanding of the alternatives and the potential impacts.

These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. Pursuant to the National Capital Planning Act, as the central planning agency for the federal government in the National Capital Region, NCPC is required to review the project and therefore NCPC requests to be a cooperating agency on the EA. NCPC also requests to be a consulting party under Section 106 of the National Historic Preservation Act.

We look forward to working with you on this important project. If you have any questions on these comments, please contact Jennifer Hirsch at (202) 482-7239 or jennifer.hirsch@ncpc.gov.

Sincerely,


FOR Lucy Kempf
Director, Urban Design and Plan Review Division



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

November 13, 2015

Alexcy Romero, Superintendent
National Park Service
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

Re: Rehabilitation for Arlington House
Arlington, Virginia
DHR File No. 2015-1056

Dear Mr. Romero:

Thank you for your letter of October 9, 2015 informing us that the National Park Service (NPS) is preparing an Environmental Assessment for the Rehabilitation of Arlington House, a site administered by the George Washington Memorial Parkway (GWMP). Your letter also serves to initiate the Section 106 process under the National Historic Preservation Act for this project. We understand that the GWMP will conduct consultation pursuant to Section 106 separately but concurrently with preparation of the EA under the National Environmental Policy Act.

As described in your letter treatment of the mansion will include stabilization of the foundation, rehabilitation of the portico and entrance, restoration of exterior finishes and hardware, improvement of the climate management and fire suppression system, installation of new electrical lighting and security systems and restoration of the conservatory. Site work outside the mansion will include restoration of the west room of the north slave quarters, rehabilitation of the south slave quarters, renovation of the existing museum and relocation of the bookstore, and restoration of the historic grounds and gardens. In addition an interpretive overlook may be added to Arlington Woods, west of the mansion.

We have reviewed the maps showing the project area and the Area of Potential Effects (APE) and concur with your definition of the APE. The information available at present on

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6408
Fax: (804) 862-6196

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

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

the PEPC website does not provide a level of detail sufficient for us to provide more than very preliminary comments. We look forward to participating by teleconference in the work session for this project with the NPS and staff from the Commission of Fine Arts and the National Capital Planning Commission on December 9.

We offer the following very preliminary comments for your consideration based on the information presented at the Open House/Public Scoping meeting. Our principal concern is that the concepts proposed for Accessibility and Climate Control may not be consistent with the Secretary of Interior's *Standards for the Treatment of Historic Properties* and so may potentially result in adverse impacts. Of the concepts presented, Concept 3 appears to have the least impact on either the front portico or a rear entrance. The footprint of Concept 3 for the front portico and rear south entrance appears to be minimal in comparison to either Concept 1 or 2. In addition it appears that a goal of the "Site Plan – Proposed Concepts" is to focus orientation of visitors to the rear of the mansion and associated slave quarters, kitchen gardens, potting shed, comfort station, and proposed new bookstore. If this is the case then a more modest treatment of the front portico would be appropriate if it is to be used as an exit rather than primary visitor entrance to the mansion. Have you considered limiting all access to the House for tours to the rear, perhaps through the conservatory, rather than through the primary façade? A climate buffer for the main house would be more easily maintained through the conservatory at the south rear entrance. Careful coordination of tours should allow entry and exit through the same opening. Access to the view from the front door could be made available through installation of interior glass doors, allowing all visitors to experience the view of the cemetery and the river while easing the difficulty of maintaining climate control. Access to the portico itself if desired could be improved by replacement in kind to create an even and more accessible surface. A temporary ramp could then still remain to allow accessibility. DHR encourages NPS to continue to investigate alternatives.

We look forward to working with you to bring the 106 process on this project to a successful resolution. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804) 482-6088 (for archaeology) and M. Amanda Lee at (804) 482-6092 (for architectural issues).

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst
Division of Resource Services and Review

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6408
Fax: (804) 862-6196

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

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

February 8, 2016

Matthew Virta Cultural Resources Program Manager
National Park Service
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

Re: Rehabilitation for Arlington House
Arlington, Virginia
DHR File No. 2015-1056

Dear Mr. Virta:

Thank you for taking the time to update us on the Rehabilitation of Arlington House during our biennial meeting on January 20, 2016. The discussion focused on the various options developed by NPS for the proposed ADA upgrade and rehabilitation of the House and the mansion which provided in the PowerPoint presentation dated 17 November 2015 at the recent meeting with the Fine Arts Commission and the National Capitol Planning Commission. We appreciate the opportunity to review this material as well as the comments made by the Fine Arts Commission and the National Capitol Planning Commission. The Department of Historic Resources (DHR) understands the National Park Service (NPS)'s need to improve the visitor experience at Arlington House by making the mansion and surrounding grounds more accessible and attractive; however, we believe that these goals may be achieved in a manner that is more appropriate for the long-term preservation of this nationally significant historic property than is proposed in some of the options currently under consideration. Please accept the following comments as DHR's response to the proposals under consideration by NPS as illustrated in the 17 November 2015 PowerPoint. Many of our comments are reiterations of what was said during out 20 January conference call; however, some may be new as we have had more time to deliberate on the options NPS presented.

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6408
Fax: (804) 862-6196

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

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

It is our understanding that NPS intends to orient visitors to the rear of the building where tours will begin. Therefore, NPS designed ADA accessible alternatives (Options 1, 2, and 3) which will allow entry into Arlington House from one of three egress points at the rear or southwest elevations. Of these options, we prefer Option 3—Southwest Entry At Conservatory as the least harmful to the historic character and design of the mansion. Unlike comments made by other review agencies, DHR is not concerned about the use of an earthen ramp to achieve the necessary elevation in order to reach the doorway. We believe that the gradual rise resulting from the berming of earth along a secondary elevation will appear more natural to the site than if a detached metal ramp were constructed. Option 1—North Entry at Outer Hall/Pantry is the least desirable solution as it requires a long ramp with numerous switchbacks constructed to reach the necessary entry elevation. Option 2—Center Entry at Hunting Hall may be acceptable with a proper ramp design that is complementary to the historic house. We do recommend, however, that any berm be created from clean fill brought in from off-site to avoid the potential for affecting archaeological levels or features.

Concerning the proposals for visitors to exit via the main door onto the portico, DHR believes that none of the four options currently contemplated are appropriate to the architectural character of Arlington House, nor do we believe that they conform to the guidance expressed in *The Secretary of the Interior's Standards for Rehabilitation* (Standards). As noted by NPS, the portico is a character-defining feature of Arlington House and the view it offers of Washington, D.C. is an important visitor experience. The DHR agrees with NPS on both these points, but we believe it is not necessary to adversely impact the former to achieve the latter. As currently envisioned, NPS wants to end its house tours by having visitors exit through the front door onto the portico so that the guests may enjoy the scenic vista onto the federal capital. To realize this, the six-inch difference between the front door threshold and the floor of the portico will need to be made plumb. The NPS proposes four options to achieve this, which range from a sloped walk to a raised portico floor (Option 1) to a sloped walk to portico, raised landing at portico entrance/exit with a glass vestibule (Option 4). All solutions include some sort of ramp onto the portico and leveling of the portico floor with the front door threshold by either raising the portico floor or constructing a ramp at the front door. Again, DHR considers all of the options in the 17 November 2015 presentation as contrary to the *Standards*. However, we believe that an acceptable solution that maintains the historic character of the portico and meets NPS's goal of allowing visitors access to its impressive views is possible. The DHR requests that NPS consider altering its plan to have visitors exit house tours onto the portico and instead install an interior glass door at the front door. This will allow visitors to experience the view from the house toward Washington, but does not require alterations to the threshold or portico. Guests may also still gain access to the portico from a ramp at ground level onto the portico as they do now in order to enjoy the scenic view at their leisure. This solution may necessitate NPS reorganizing its tour schedule and route so the (presumably) the Conservatory door could be used as both an entrance and exit, or ramps could be built at both the Conservatory and at the Hunting Hall if this would be more efficient. The use of a glass interior door that is not normally in operation at the front would

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6408
Fax: (804) 862-6196

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

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

also assist in maintaining internal environmental control. The current metal ramp or, if NPS desires, a new one that is more attractive, can be used to access the portico.

With respect to the proposed Comfort Station Addition, as the building is modern NPS has greater leeway as to how it is treated. We recommend that if a low pitched roof is used than the roofline on the Comfort Station should be altered to match. We would also like to be involved in the Addition's design as plans progress in order to ensure that the new structure harmonizes with the existing architecture. Archaeological survey of the area of the Comfort Station prior to its construction did not identify any intact levels or features within the building footprint ((Leedecker and O'Neill, 2005). The 1864 Hergesheimer map shows two small (about 5 x5- foot) buildings on the wooded slope and a 10-to 15-foot-square building located a few dozen feet to the east). If the proposed Addition will be located outside of the 60x60 –foot grid surveyed, additional archaeological work may be warranted. It is not clear whether any of the Tram Stop Options have previous been subject to archaeological survey. At this time, DHR has no preference for one option over another.

Please continue to consult with DHR as NPS further develops the plans for this undertaking. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804) 482-6088 (for archaeology) and Marc E. Holma at (804) 482-6090 (for architectural issues).

Sincerely,

A handwritten signature in black ink that reads "Ethel R. Eaton". The signature is written in a cursive, flowing style.

Ethel R. Eaton, Ph.D., Senior Policy Analyst
Division of Resource Services and Review

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6408
Fax: (804) 862-6196

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

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033



As the nation's principal conservation agency, the Department of the Interior has responsibilities for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for American Indian reservation communities and for people who live in island territories under US administration.