

FINDING OF NO SIGNIFICANT IMPACT

Rehabilitation of Arlington House, Outbuildings & Grounds Arlington House, The Robert E. Lee Memorial (An Administrative Unit of the George Washington Memorial Parkway) Arlington, Virginia

At Arlington House, the Robert E. Lee Memorial, the National Park Service (NPS) will rehabilitate the Arlington House, its outbuildings (North and South Slave Quarters), and its historic grounds (Kitchen Garden and Work Yard) in a manner that protects and maintains the cultural resources and values for which the Robert E. Lee Memorial was established. This rehabilitation will benefit the visiting public by providing a safe environment where NPS can interpret the history and significance of the site through a more accurate representation of circa 1861 historic conditions.

This action is needed because previous reconstructions of the North and South Slave Quarters are now known to be inaccurate, there is no fire suppression system to safeguard historic buildings and the museum collections housed within those buildings, and the current mechanical system is not capable of maintaining a climate suitable to preserve the historic buildings and collections. Additionally, the 1921 comfort station is a non-contributing structure in the historic Kitchen Garden, the 1861 Work Yard and Kitchen Garden were previously interpreted and reconstructed inappropriately, and the foundation of Arlington House has deteriorated due to drainage and humidity problems.

The NPS completed an environmental assessment (EA) that provides an analysis of the environmental consequences of the alternatives considered for the rehabilitation of Arlington House, Outbuildings, and Grounds.

SELECTED ALTERNATIVE

The selected alternative is Alternative B (Preferred Alternative), as described and analyzed in the EA. Under this alternative, the NPS will:

- Rehabilitate the North and South Slave Quarters
- Install new fire protection systems within Arlington House, the North and South Slave Quarters and the Potting Shed (Museum)
- Install a new climate management system within Arlington House and the North and South Slave Quarters
- Construct a new mechanical bunker to support the new systems
- Remove the existing 1921 comfort station and replace it with a modern ADA-compliant facility at a different location
- Improve site accessibility and stabilize soils within the historic area
- Stabilize the foundation of Arlington House
- Rehabilitate the Kitchen Garden

Specific actions to be done under this alternative are detailed below.

Rehabilitate the North and South Slave Quarters

NPS will rehabilitate the North and South Slave Quarters back to their 1861 appearance for interpretation of African-American heritage. The rehabilitation will maintain the structural integrity of the buildings by restoring the 1861 appearance of the stucco over brick masonry. Administrative use of the east room of the South Slave Quarters (storeroom for African American slavery exhibit), and the west room of the

North Slave Quarters (upper and lower quarters for bookstore) will continue until other more appropriate space can be found. Specifically, the following actions will occur within the North and South Slave Quarters:

Exterior Treatments

- The existing 1880s and 1960s era roof structural system, including all non-original joists, will be removed and replaced with joists and rafters based on dimensions of surviving original timbers above the North and South Slave Quarters.
- The existing 1960s cement tile roof will be replaced with a new wood shingle roof to match the 1860s appearance (simulated wood shingles may be used for fire resistance and sustainability).
- The east chimney and west chimney above the roof level in the North Slave Quarters will be rebuilt.
- The existing half round gutters will be replaced and additional round downspouts will be installed to help address moisture problems in the North Slave Quarters.
- The deteriorated, delaminated, and inappropriately-patched smooth stucco and rough cast stucco finish will be removed on all elevations and replaced with new materials that most closely match the nearest historic material in appearance and composition. A strict conservation plan for the surviving historic stucco will ensure the preservation of as much historic finish as possible in both Slave Quarters.
- Existing window sashes will be removed and stored in the park collection. New restoration sashes will be fabricated for four upper window openings based on the surviving center window in the North Slave Quarters.
- The fresco plaques over the doors will be stabilized.
- The strap hinge hardware will be replaced with hardware appropriate to the period and the drip function of sills in both Slave Quarters will be re-established.
- The north elevation window openings on the lower level will be re-opened and six over three sashes in the North Slave Quarters will be installed.
- Inappropriate woodwork will be replaced, including the plank water table on the east elevation along with two piece molding to match that on the west elevation in the North Slave Quarters.
- Deteriorated fascia board and other trim will be repaired or replaced as necessary in both Slave Quarters.
- Exterior stucco in both Slave Quarters will be painted (with a mineral coating).
- The perimeter drainage and finished grade will be modified for accessibility at both Slave Quarters.
- Doors from the 1860s will be replaced based on historical drawings.
- The road near the west elevation of the North Slave Quarters will be moved away from building and/or bollards added.
- The soffit beneath the north and south eaves will be replaced with flush boards in the South Slave Quarters.
- The vent/niche assembly in the center of the south elevation of the South Slave Quarters will be re-secured.
- The exterior grade at the west room (Selina Grey's) of the South Slave Quarters will be adjusted to make the room accessible.

Interior-Treatments - South Slave Quarters

West Room (Selina Grey's):

- The earthen floor will be lowered close to the original grade to expose the original hearth and reveal the raised door threshold. A viewing platform inside the doorway will be provided for public interpretation.
- The 1950s NPS plaster at the east and west walls and the fireplace breast will be selectively removed to confirm the current loft position and determine whether evidence of the original ceiling finish survives. The chimney breast will be rebuilt by removing the step in the vertical plane and installing a reproduction fireboard according to the Historic Structures Report drawings.
- If no new evidence is revealed, the joists will be retained in their current position, the current plaster ceiling will be removed from the joists, and a new wood lath and plaster ceiling will be installed.
- Selected areas of 1959 plaster and selected areas of later fireplace alterations will be removed to determine the historic dimensions and configuration. If no additional information is revealed, the firebox will be kept square and the dimensions of the opening altered to approximately 36-inches by 36-inches.

Center Room (Smokeroom)

- The existing brick floor will be removed and salvaged and the dirt floor will be raised to the level of the door threshold.
- A basin-shaped hearth in the center of room will be created with stones found during the archeological investigations.
- Three reproduction center beams with meat hanging hooks will be reinstalled in the existing original pockets.

Interior- Treatments - North Slave Quarters:

East Room (Summer Kitchen below, Cooks Quarters above)

- The 1964 chimney and 1929 fireplace (below current NPS floor) will be removed by hand from the east wall and any new discoveries of historic plaster, finishes, evidences of flues or fireboxes, nailing blocks, or other features will be documented.
- The existing 1964 NPS floating floor and ceiling will be removed.
- Floor joists, bulkhead, and floor planks will be installed to divide the summer kitchen and the upper level living space.
- A landing and stairway will be installed along the south wall descending into the summer kitchen floor level and bulkhead. A peel-back wall opening into the upper level will be provided.
- A relatively-rough lime plaster finish that matches the period of significance finish that was uncovered during recent physical investigations will be applied to all exposed wall surfaces and to the summer kitchen ceiling up to the roof structure.
- Representative areas of the original plaster and finish will be consolidated and preserved. Protective measures will be considered for interpretive purposes, such as installing vented Plexiglas coverings on select areas.
- The existing chimney and fireplace remnants will be removed and the historic chimney along the east wall will be reconstructed based on measurements obtained during recent physical investigations. A fireplace will be installed in the summer kitchen, and any new discoveries of

historic plaster, finishes, evidence of flues or fireboxes, and nailing blocks or other features will be documented.

- The arch-reinforcing buttress on the north wall shoulder and adjacent to the west interior wall will be rebuilt.
- The 5-inch baseboard on the north wall at the upper level will be repaired.
- The brick floor in the kitchen will be repaired with a basket weave pattern, particularly around the temporary columns (1/3 of floor).

Center Room (Mammy's Room):

- The infill from the historic door openings to the east and west room upper-level living spaces will be removed.
- A vertical plank partition wall with a door opening and a plank door will be reconstructed in order to divide the space into the forward entrance vestibule and the rear living space, and will be located in the same position as the historic wall.
- A reproduction ship's ladder will be installed below each opening to provide access from the vestibule floor level.
- A new plank floor and baseboards will be installed using the existing floating floor structure.
- Deteriorated or delaminated areas of earlier plaster layers will be removed to the nearest sound lay/area. These areas as well as areas of exposed brick will be patched with lime-based plaster, ultimately blending with the later NPS layer.
- New patches with lime-based whitewash will be covered to blend with historic finishes. Scoring in selected areas of the original plaster finish will be duplicated when making repairs to these locations
- The board from the ledge on the back wall will be removed; historically the feature had a plaster surface.

Install Fire Suppression System within Arlington House, the Slave Quarters, the Potting Shed, and new mechanical bunker

The NPS will install a new wet pipe sprinkler system, in combination with a dry pipe system for non-heated attic spaces and both Slave Quarters. An addressable fire alarm system will be installed in Arlington House, both of the Slave Quarters, the Potting Shed (Museum), and the new mechanical bunker. These actions will minimize the chance of a catastrophic loss of the historic structures and collections by fire.

In Arlington House, a wet pipe sprinkler system will offer fixed fire protection using piping filled with pressurized water for the basement and the first floor. The dry pipe sprinkler system will be used in both Slave Quarters, the Potting Shed and unheated attics of the Arlington House subject to freezing temperatures. The dry system piping is charged with compressed air instead of water. Closed heat-sensitive automatic sprinklers will be located in accordance with recognized installation standards. Upon operation, the sprinklers will distribute the water over a specific area to control or extinguish the fire. As the water flows through the system, an alarm will be activated to indicate that the system is operating. Only those sprinklers immediately over or adjacent to the fire will operate, minimizing water damage.

The entire system will be designed to permit quick, easy maintenance. In order to minimize the visual intrusion on the historic building interiors, multiple risers will be installed in closets, and sprinkler piping will be recessed above non-ornate plaster ceilings between the floor /ceiling joists. On the second floor of Arlington House, this will require the removal and reinstallation of wide heart pine boards. A great deal of coordination will be undertaken to install the sprinkler piping in accordance with the National Fire

Protection Association's (NFPA) 13 requirements, while minimizing impact on historic fabric. NFPA 13 provides industry standards for the installation and maintenance for indoor sprinkler systems.

A remote central fire pump room in the new mechanical bunker will contain the sprinkler equipment including a fire pump, control valves, and backflow preventor. Arlington House, the North and South Slave Quarters, and the Potting Shed will be tied into the central sprinkler system in the mechanical bunker. Compressors for the dry pipe sprinkler zones will be located in the basement of Arlington House, the crawl spaces of the Slave Quarters and in the partial basement of Potting Shed.

A new addressable fire alarm system will be installed in Arlington House, the Slave Quarters, the Potting Shed and the mechanical bunker. The fire detection system will have conventional smoke detectors with concealed wiring (except for laser sensors in high risk areas in attics, basements and crawl spaces with electrical/mechanical equipment or compressors). The fire detection and alarm will be a microprocessor-based addressable system to pinpoint the location of a fire with monitors located both in the mechanical bunker and the Old Administration Building.

Install Climate Management System and Associated Mechanical Bunker

The NPS will replace the existing forced-air heating system in Arlington House with a remote climate management system serving Arlington House and the Slave Quarters. The system will temper ventilation to provide seasonal relative humidity control and allow for seasonal drifts in the interior temperature, thereby helping to preserve the artifacts and collections in Arlington House and the Slave Quarters as well as the historic structures themselves. The relative humidity within the house will range between 30 percent and 70 percent. Each central system will produce a variable air volume (VAV) of conditioned air through medium pressure ductwork to VAV air terminal units (ATU). Each ATU will serve a single zone: one zone per Slave Quarters and four zones for Arlington House. Duct work will be hidden from public view by running risers through closets and ducts between floor and ceiling joists. The duct vents will be small, and placed inconspicuously within attics above non-ornate plaster ceilings and under the first floor of Arlington House.

NPS will install a VAV double wall modular air handling unit (AHU), air-cooled chiller and condenser, gas-fired boiler, humidifier, VAV return fan and system pumps. The air cooled condenser will be shielded from view. This system will provide precise temperature and humidity controls over the tempered air. The system will also be the most energy efficient and use gas for heat and electric power for pumps and fans. The bulk of the machinery will be located within the mechanical bunker. The bunker will be built along the western edge of the Kitchen Garden, cut into the slope facing Sherman Drive, and outside the rehabilitated historic Kitchen Garden grounds. The bunker will be built underground with a "green roof" and will not be visible from the rehabilitated historic Kitchen Garden grounds. This bunker will also house the mechanical systems necessary to run the fire suppression and alarm system. The routing and placing of all new mechanical, electrical and plumbing utilities underground has been investigated and cleared by archeologists. The existing utilities trench will be reused. Utilities will enter historic buildings underneath the building foundations and will not go through historic foundation walls.

Design / Construct New Comfort Station

NPS will demolish the existing non-contributing 1921 comfort station along with its obsolete mechanical basement and remove the temporary accessible port-a-toilet. A new comfort station and a separate underground mechanical bunker will be constructed outside that portion of the historic Kitchen Garden grounds to be rehabilitated. The current comfort station is located directly north of the North Slave Quarters. It is considered a non-contributing structure within the 1861 historic grounds and an intrusion, preventing proper restoration and interpretation of both the Kitchen Garden and the North Slave Quarters. The existing mechanical basement below the comfort station provides restricted mechanical space for a gas-fired boiler, hot water pumps, and electrical panels. Presently, continued water penetration through the basement wall into the electrical room poses a safety hazard.

The new comfort station will be set outside of the north boundary of the rehabilitated historic Kitchen Garden grounds (as defined by the NPS 1966 Master Plan). The full northern extent of the historic Kitchen Garden circa 1861 encompassed the Potting Shed and extended to the top of the wooded slope. The location of this new non-contributing structure will thus be at the northern edge of the historic Kitchen Garden grounds, but will be less visible and will allow a more accurate interpretation of the southern half of the Kitchen Garden. The footprint of the building will be angled, departing from the orthogonal grid of the historic structures.

There are two options for the comfort station. The first option is a newly constructed building designed with a service life of 25 years. The second option, due to budget limitations, is mobile comfort station trailer units (one for men and one for women). These units will be installed on or near the footprint of the new comfort station. These units measure 10 feet by 36 feet (combined will equal 720 square feet). The men's unit contains one handicap-accessible stall, five urinals, two standard stalls and five sinks. The women's unit contains one handicap-accessible stall, seven standard stalls and five sinks. Each unit contains lighting, heated water, HVAC and one electric hand dryer/blower. Drinking fountains could be added to either or both units. The units would be transported by a tractor truck and can be towed to the desired location without any adverse impacts to the historic structures on the site. The units would be plumbed with potable water via an extension from the existing fire line and plumbed with sewer through the addition of a new sewer line running generally west to Sherman Drive where it will tie into the existing sewer system via an existing manhole. Both units may be painted and/or screened with lattice or informal screen planting to mitigate their impact on the viewshed of the site.

Rehabilitate the Kitchen Garden, Grounds and Site Access

NPS will make changes to the Kitchen Garden and Work Yard that will more closely reflect the primary period of significance (1802-1861) while recognizing that changes made in a later period have historic significance in their own right (i.e. the Army's Potting Shed, which was part of a greenhouse built on the Kitchen Garden for post-Civil War Arlington Cemetery occupancy).

Within the constraints of the northern boundary as defined by the Potting Shed, the eastern, western and southern boundaries will be expanded to the full extent to better represent the Kitchen Garden's relationship with the North Slave Quarters, the Work Yard, and the wooded slope along Sherman Drive circa 1861. The following actions will occur:

- The 1921 comfort station and adjacent 20th-century vegetation will be removed.
- The 1950s era English holly (*Ilex aquifolium*) hedge will be removed, except along the eastern and northern boundaries.
- The existing maintenance shed will be removed.
- The existing wayside at the entry to the Kitchen Garden will be removed.
- The Kitchen Garden will be reconfigured to create a larger rectangular space. The boundaries will be:
 - Southern boundary: parallel to the North Slave Quarters and offset approximately 10-feet.
 - Western boundary: 120-feet from the eastern boundary as outlined in the archeological investigations.
 - Northern boundary: the southern edge of the Potting Shed.
 - Eastern boundary: the existing holly hedge as cited in the archeological investigations and extended to the southern boundary.
- A row of evergreen trees (*Juniperus virginiana* or *Ilex* sp.) will extend from the southern edge of the holly hedge along the eastern boundary wrapping around the southeast corner of the Kitchen Garden.

- The common horsechestnut (*Aesculus hippocastanum*) located between the House and the Kitchen Garden will be replaced with a deciduous tree with a weeping form similar to weeping willow (*Salix babylonica*).
- The Kitchen Garden will be surrounded by a post and rail fence with a picket gate and two barberry bushes flanking the gate. There will be two removable sections (one at the southwest corner and one at the northwest corner) to allow for occasional vehicular access to the comfort station and Potting Shed.
- A 5-foot wide gravel path will surround the Kitchen Garden, just inside the rail fence. A central path will align axially with that of the flower garden.
- The two planting beds formed by the gravel paths will be wrapped by a 5-foot-wide turf strip. The strip that runs north and south along the western boundary will lie above engineered soil to allow for occasional vehicular traffic to the new comfort station and the Potting Shed.
- A row of fruit trees will be planted on either side of the central path in the turf strip. Dwarf varieties of cherry, pear, plum, and apricot will be used.
- Informal screen plantings will be added east of the mechanical bunker and on the south side of the new comfort station.
- A new wayside will be added outside the northern boundary of the Kitchen Garden to interpret the early cemetery development, including the Potting Shed.
- In the Work Yard the boxwood and ivy will be removed, and black locust (*Robinia pseudoacacia*) will be planted. The area will be re-graded and surfaced to match the surrounding gravel area, and a low wooden rail fence will be added on the north side. When the 131-year-old Deodar cedar (*Cedrus deodara*) dies, five black locust trees will be planted.

Stabilize the Foundation of Arlington House

NPS will replace badly-deteriorated historic brick masonry, mostly in the east foundation of the South Wing of Arlington House. Masonry units will be custom-sized reproduction brick to match the historic brick set in 3/8-inch lime mortar joints. Mortar color and striking of the joints will be considered in an effort to match the original appearance. The repointing done in some areas using Portland cement will be cut out and replaced with custom-sized reproduction bricks and lime mortar.

Construction Staging

The existing Work Yard entrance off Sherman Drive will be the point where construction equipment will enter and exit the grounds. For the demolition of the existing comfort station and the construction of the new mechanical bunker and comfort station, the staging area for construction equipment, stock piling of dirt, and storage of materials will be located within the western portion of the Kitchen Garden. Prior to the use of the Kitchen Garden as a staging area, the area will be covered with an approved filter fabric, and gravel will be placed on top to harden the surface to minimize damage to the Kitchen Garden. Both will be removed prior to project closeout and the soils will be tilled in order to mitigate any compaction that took place during staging. To protect the public safety and to screen the staging area, the existing hedgerow will remain, and the perimeter will be enclosed with a locked chain link fence supported on temporary concrete blocks. Snow fences will be placed around the staging and construction areas for pedestrian control and tree protection.

The contractor's primary staging area for work being conducted in the interiors of Arlington House and the North and South Slave Quarters will be located in the existing Work Yard area between the large cedar tree and the North Slave Quarters. The perimeter will be enclosed with a locked chain link fence supported on temporary concrete blocks. Jersey barriers will be installed at the corners of the Slave Quarters. A locked and screened toilet facility for construction workers may be provided in this area. A construction dumpster and a trailer will also be necessary and will be located in the Work Yard area,

southwest of the cedar tree. Contractor parking will be in the parking lot adjacent to the NPS Administration Building and will be limited to five spaces.

ALTERNATIVES CONSIDERED

The environmental assessment prepared for this project analyzed the selected alternative (described above) and the No Action Alternative.

The No Action Alternative consists of a continuation of ongoing operations. Under the No Action Alternative, the NPS would continue with its current maintenance protocols within Arlington House and its outbuildings and grounds. Therefore, no historic rehabilitation work would be undertaken to any of the Slave Quarters or Kitchen Garden. The historic buildings would continue to operate without a modern climate management system, subjecting the structures and artifacts housed in the buildings to wide ranges in humidity and temperature. The current fire protection system does not include fire suppression (sprinklers) and consists of obtrusive fire alarms, smoke detectors, and fire extinguishers in every room. It would remain unchanged under the No Action Alternative, continuing the risk of a catastrophic loss by fire. The existing non-ADA accessible, non-contributing 1921 comfort station would remain within the historic Kitchen Garden area. No efforts would be taken to either address the current foundation problems or improve the existing subsurface drainage in and around Arlington House. Despite the constraints associated with inadequate systems, under the No Action Alternative, the park would continue to strive to protect resources to the extent possible under existing policy requirements and guidelines. In addition, visitors would continue to have access to the site and to tour Arlington House under current park operational policies.

NPS staff considered additional alternatives during preliminary planning and internal scoping; however, these alternatives were not retained for further analysis because they did not meet the purpose and need, duplicated other less environmentally damaging alternatives, conflicted with park plans or statement of purpose and significance or other policy, had severe environmental impacts, or as a secondary reason, were economically infeasible. The following elements were considered for inclusion into the park's Preferred Alternative, however were dismissed for the listed reasons.

ALTERNATIVES CONSIDERED FOR FIRE SUPPRESSION SYSTEM

Pre-Action Dry Pipe Sprinkler

A pre-action dry pipe sprinkler could protect museum artifacts/collections from accidental water damage. However, with this system there is up to a 60 second delay after a fire is detected before the sprinkler discharges. This lag time would allow the fire a longer time to cause damage prior to being extinguished. The system would also require an air compressor to be located within the historic buildings. In addition, there is not sufficient space within the floorboards to allow for sufficient slope to drain the pipes in the heated spaces, which would greatly increase the amount of visual intrusions within the historic interiors.

High Pressure Mist System

This alternative was considered but dismissed for several reasons. High pressure mist systems are designed to smother a fire with humidity and work best in tight, compartmented spaces. In a historic mansion like Arlington House, with large window openings, high ceilings, interconnected spaces and open stairs, this type of system has not proven effective. The system is wet and under high pressure, and damage to the heads could result in accidental discharge (recessed concealed heads are not available). A high pressure mist system would be more suitable for a confined archival storage area. The system requires installation of both water and nitrogen tanks and special equipment within the historic structure. The number of heads that can discharge is limited. As the system is wet, it cannot be installed in areas not heated to above a minimum of 40 degrees Fahrenheit without glycol protection or dry pipe sections isolated by check valves. Furthermore, the cost of a high pressure mist system is at least 50% more than a conventional wet pipe sprinkler system. The system also requires that the pipes have sweeping pipe

bends, large knuckle couplings and frequent brackets, which would greatly increase the amount of visual intrusions within the historic interiors.

ALTERNATIVES CONSIDERED FOR THE CLIMATE MANAGEMENT SYSTEMS AND PLACEMENT OF MECHANICAL BUNKER

Water Source Heat Pump

A water source heat pump would require a cooling tower, which would be a visual intrusion on the cultural landscape and would need to be shielded from view. The two pipe heating and cooling system would provide moderate temperature and humidity control over tempered (cooled & dehumidified or heated & humidified) air. However, the system is not energy efficient and uses electric power for circulating pumps and fans. It has less plant equipment (heat exchanger, condenser circulating pumps, and fans), requires a smaller bunker, and involves less maintenance. While this alternative would have the lowest construction costs, this alternative was dismissed because of the visual intrusions it would cause and also because it has the highest operational cost (energy) of all alternatives considered.

Geothermal Heat Pump

This system would not require a cooling tower, and the two pipe system provides limited temperature and humidity control over tempered (cooled & dehumidified or heated & humidified) air. The system is energy efficient, and uses electric power for pumps and fans. It has the least plant equipment (pumps and fans), requires the smallest bunker and requires the least maintenance. However it requires a geothermal field as a heat and cooling source, which makes it the most expensive system for construction. The high construction cost is somewhat offset by lower operational cost.

Placement of Mechanical Bunker North of Potting Shed

Under this alternative, the mechanical bunker would be an above grade mechanical structure that would be located immediately in front (North) of the Potting Shed. If the bunker were located at this site, it would be an intrusion on the cultural landscape. The location is too remote from Arlington House and the Slave Quarters to serve its intended use efficiently with the increased underground utility installation and life cycle operating costs. There would be access and egress problems if it were located below grade, and the structure would detract from public visitation to the existing museum exhibit in the Potting Shed.

Placement of Mechanical Bunker within the existing basement of existing Comfort Station

Under this alternative, the mechanical bunker would be within the historic Kitchen Garden in the basement of the existing comfort station. This alternative was dismissed because the existing comfort station is considered a non-contributing structure within the 1861 historic grounds and an intrusion that is preventing proper restoration and interpretation of both the Kitchen Garden and the North Slave Quarters. In addition, the existing basement space is too restricted for climate management mechanical equipment.

ALTERNATIVES CONSIDERED FOR THE DESIGN AND PLACEMENT OF THE NEW COMFORT STATION

Rehabilitate 1st Floor of Potting Shed for Comfort Station

This alternative would have avoided introducing another structure in the cultural landscape. However it was dismissed because it would have displaced the existing museum exhibit space from the Potting Shed, and disrupted the existing park operations and alternative draft plans for the Potting Shed.

Rectangular Comfort Station on West Edge of Historic Kitchen Garden

Under this alternative the rectangular comfort station would be sited on a steep slope and designed to sit atop of the newly installed mechanical bunker. While this location would encourage pedestrians to use the maintenance path, placing the comfort station at this location would have visually intruded on historic Kitchen Garden and the overall cultural landscape of Arlington House.

Old Administration Building (west of historic area)

The Value Analysis considered any possible public restrooms within the Old Administration Building as too far removed from immediate needs of visitors to the historic area to be a viable alternative. The location for a new comfort station was refocused on the historic area because of restricted NPS land ownership within surrounding Arlington Cemetery, space limitations within existing NPS buildings outside the historic area, and Arlington Cemetery's continued use of other buildings outside the historic area.

Addition of a Comfort Station to the Potting Shed

This alternative called for the comfort station to be added on north (front) elevation of Potting Shed. This alternative was considered but dismissed because it would detract from the exterior integrity of the historic 1880's Potting Shed. This alternative also would have disrupted the existing museum exhibit in the Potting Shed and existing park operations and alternative draft plans for the Potting Shed.

Existing Comfort Station

Continued use of the existing comfort station would require making the structure ADA accessible, which would involve major entry alterations, extensive ramps, and a 50% reduction in number of fixtures. The existing comfort station is considered a non-contributing structure within the 1861 historic grounds and an intrusion, preventing proper restoration and interpretation of both the Kitchen Garden and North Slave Quarters.

GROUND AND SITE ACCESS REHABILITATION

The Custis-Lee Garden, 1861

Under this alternative, the Kitchen Garden would be reconstructed to the elements and overall design of the Kitchen Garden for the year 1861. This alternative was dismissed because it would result in the construction of a comfort station within the footprint of the original Kitchen Garden, which occupied the entire northern plateau. In addition, the historic Potting Shed would also be removed under this alternative, losing its current interpretive and functional value.

Refinements of the Kitchen Garden to 1861

Under this alternative, features from subsequent periods of the early cemetery development would remain within the original boundaries of the Kitchen Garden. While this alternative would provide the opportunity to place a new comfort station outside the boundaries of the Kitchen Garden, the original Custis-Lee period spatial organization would be compromised by retaining elements from the cemetery development. As a result this alternative was dismissed because, by not restoring the Kitchen Garden to its pre-1880s size, the symmetry of the Custis layout of the grounds would be compromised.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of the National Environmental Policy Act (NEPA). The environmentally preferred alternative is determined by applying the criteria identified in Section 101 of NEPA to each alternative considered. The criteria include:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;

5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The Preferred Alternative is the Environmentally Preferred Alternative and will most closely satisfy the policy goals detailed above. Through the rehabilitation of Arlington House, Outbuildings, and Grounds as proposed under this alternative, criteria 1 and 2 will be fulfilled. By rehabilitating the North and South Slave Quarters; installing a new fire suppression system within Arlington House and its outbuildings; installing a new climate management system and mechanical bunker to support these systems; removing the non-contributing 1921 comfort station and replacing it with a modern facility at a different location, Arlington House will more closely recreate the 1861 historic landscape, and protect these resources for future generations. The Preferred Alternative will fulfill criteria 3 by protecting public health, safety, and welfare by improving fire prevention systems, and providing an ADA compliant comfort station. Criteria 4 will be fulfilled as the important historic and cultural aspects of Arlington House are preserved and protected through activities proposed under this alternative. Finally, criteria 5 will be fulfilled with the construction of a fully ADA compliant comfort station, while enhancing the overall visitor experience with the rehabilitated Arlington House, outbuildings, and grounds.

The No Action Alternative represents the existing condition at Arlington House. The No Action Alternative would not meet criteria 1 and 2 as fully as would the Preferred Alternative. While the park is currently meeting its trustee responsibilities, and would continue to meet these responsibilities, this alternative would not provide the additional benefits to succeeding generations by not fully protecting Arlington House, its outbuildings, and collections from climate extremes, and providing the added protection of a modern fire suppression system. The No Action Alternative fulfills criteria 3 by ensuring that existing maintenance maintains a safe environment for visitors and staff. However, it does not fully address fire suppression, or ADA compliance of the park's existing comfort station. Criteria 4 would not be met as fully as under the Preferred Alternative. While the park does an adequate job at preserving its cultural resources, it would not restore the North and South Slave Quarters and grounds back to the 1861 historic landscape, as mandated by its enabling legislation. The No Action Alternative would not meet criteria 5 as fully as would the Preferred Alternative, because the current comfort station is not ADA compliant.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the mitigation measures identified in Table A will be implemented as part of the selected action. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

TABLE A: MITIGATION MEASURES TO BE IMPLEMENTED

RESOURCE	MITIGATIONS
Soils	<ul style="list-style-type: none"> ▪ Minimize the square footage of earth disturbance to the amount necessary to accomplish the project, and limit the area and duration of disturbed soil exposure to rainfall. ▪ Use erosion containment controls such as silt fencing and sediment traps to contain sediment on site where necessary. ▪ Cover disturbed soil or soil stockpiles with plastic sheeting, jute matting, erosion netting, straw, or other suitable cover material. ▪ Inspect erosion and sediment control best management practices (BMPs) on a regular basis and after each measurable rainfall, to ensure that they are functioning properly, and maintain BMPs as necessary to ensure that they continue to function properly. ▪ Sequence BMP installation and removal in relation to the scheduling of earth disturbance activities. ▪ Phase clearing to coincide with construction at a given location to minimize the amount of area exposed to erosion at a given time. ▪ Stabilize and replant exposed soils with native vegetation immediately following completion of construction activities, or during temporary cessation of the earth disturbance activities.
Surface Water	<ul style="list-style-type: none"> ▪ Implement erosion and sediment controls and stormwater BMPs as discussed under soils to minimize potential impacts to waters both in and downstream of the project area. Implement BMPs described under the mitigation measures for soils. ▪ Minimize adverse effects of fuel spills: <ul style="list-style-type: none"> ○ Locate construction staging areas away from surface water features. ○ Locate activities such as refueling well away from surface water features. ○ Designate areas where refueling or construction vehicle and equipment maintenance would be performed and have containment features such as temporary earth berms around these areas. ○ Have absorbent pads available to clean up spills.
Vegetation	<ul style="list-style-type: none"> ▪ Prior to clearing and grading, clearly mark on the ground the area to be cleared to minimize the amount of cleared area. ▪ Clear only those areas necessary for construction. ▪ Prior to clearing, assess vegetated areas to determine if there are trees in the area of the proposed area that need protection from construction activities. Any trees selected for protection would be marked and fenced. ▪ Monitor vegetation in areas replanted following construction to ensure successful establishment of native species. Remove any exotic invasive species that appear in the replanted areas.
Cultural Landscapes	<ul style="list-style-type: none"> ▪ When a new comfort station is constructed along the north end of the site, a screening device would be installed (e.g., hedgerow, wooden lattice or informal screen planting fence) to minimize the visual impacts to the historic setting of Arlington House. The mechanical bunker would be built underground with a "green roof", and would not be visible from the Kitchen Garden.

Archeological Resources	<ul style="list-style-type: none"> ▪ A Phase I Archeological Investigation was completed and examined the proposed construction zones within the area of potential effect. This survey did not locate significant resources that would be impacted by construction (as proposed in the plans at the time), but identified some resources, such as a dry well for dairy and undisturbed hearth, that should be protected/preserved. Therefore, certain zones have been “cleared” for construction work. However, should any significant archeological resources be identified during construction, work would stop until evaluation of the resources by an archeologist and appropriate measures undertaken to document the finds or mitigate impacts. In addition, any changes to construction proposals, postdating the investigations, would need additional archeological investigations. ▪ The NPS would require that underground ductwork and piping to the other structures of the building would follow previously disturbed trench areas associated with existing lines and alongside or under roadways. ▪ Equipment would be staged within the Work Yard or west half of the Kitchen Garden to reduce potential impacts on archeological resources.
Historic Structures	<ul style="list-style-type: none"> ▪ Preservation craftsmen would perform preparatory preservation work, such as removing floorboards within Arlington House’s interior, and painting and replastering following installation of fire suppression system. While the floor boards are up, the floor joists would be documented and inspected. Any necessary repairs would be made and strengthening measures performed. Exposing the floor structure should provide considerable historical information about the construction of the house. ▪ Sprinkler heads would be hidden to the greatest extent possible by recessing the units into non-ornate plaster ceilings. ▪ Park staff would oversee every stage of the installation to ensure that most of the original plaster and-historic fabric is not unduly disrupted by the contractors, that Arlington House is restored to its preconstruction condition, and that the Slave Quarters are rehabilitated according to the Historic Structures Report. During construction, interior finishes would be protected using various methods, including: <ul style="list-style-type: none"> ○ Floors and stairs would be covered with protective building paper or fiber mats ○ Handrails and newel posts would be protected with blanket padding ○ Balusters, wood wainscot, doorways and windows would be covered with protective clear polyethylene film ○ Plaster wall and wood trim corners would have Styrofoam or blanket padding for edge protection. ▪ There would be no “down time” with regard to fire and security protection for Arlington House. Temporary fire detection and suppression systems would be in place during construction and would be the responsibility of the contractor. ▪ All work would be carried out in conformance with the <i>Secretary of the Interior’s Standards for the Treatment of Historic Properties for Rehabilitation</i>.
Museum Collections	<ul style="list-style-type: none"> ▪ Prior to construction, park curatorial staff and fine arts specialists would pack museum collections and transport them to a climate-controlled secured storage facility, in accordance with the DO-24, <i>NPS Museum Collections Management</i>, and the park’s <i>Collection Storage Plan</i>. ▪ Immovable objects, such as any fixtures and paintings, would be protected as a part of the initial preparatory preservation work to be performed by park staff. ▪ Collections would be returned and reinstalled in Arlington House only after construction documents indicate that all fire protection, electrical and mechanical systems are complete, operating, and have been tested. ▪ All museum collections handling would be performed by qualified, trained personnel, using proper equipment and tools, and collections would be protected at all stages of transport from potential environmental threats including water damage, rapid fluctuations in temperature and/or humidity, theft, excessive vibration, predicted storms, or other as noted by NPS museum standards.

Human Health and Safety	<ul style="list-style-type: none"> ▪ The NPS would close sections of Arlington House and the entire North Slave Quarters to the public for the duration of the installation of the fire suppression and mechanical systems. During the first phase of construction, the following areas would remain open during the entire extent of construction: the front portico of the House, the flower garden, the South Slave Quarters, the Potting Shed, and the east side of the Kitchen Garden. Limited ranger led tours of the first floor only may be available on a first come, first serve basis or limited to school groups. Tours and schedules would be coordinated with the rehabilitation activities. ▪ The NPS would require the construction contractor to follow to follow OSHA and NPS construction contract standards during construction. These standards include, but are not limited to: training and instruction for handling and use of hazardous materials, designation of a hardhat area, and implementation of an accident prevention program. The construction contractor would be required to post construction warning signs at the construction site and along nearby roads to notify employees and park visitors of the construction site and dangers at the site. The construction contractor would also install and maintain construction fences around the construction sites to prevent non-contractors and the public from entering the construction areas.
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WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an Environmental Impact Statement (EIS): As described in the EA, several resource areas will experience adverse impacts during the rehabilitation; however, with the rehabilitation of Arlington House, Outbuildings, and Grounds, the overall long-term impacts will be beneficial. There were no long-term major adverse or beneficial impacts identified that require analysis in an Environmental Impact Statement. Adverse short-term minor impacts to soils will occur from necessary disturbance, potential placement of fill, and the compaction of soils in and around the sites for the new mechanical bunker and comfort station. Adverse short-term negligible and long-term minor impacts to vegetation will occur as a result of construction-related disturbances.

Activities that will require subsurface excavation or ground disturbing activities could have adverse long-term negligible impacts to archeological resources. Museum collections will be at some short-term risk of accidental damage during transport prior to construction activities, which could result in adverse long-term minor impacts. However, beneficial long-term minor impact to the museum collections would occur from the implementation of climate (humidity) controls and fire suppression systems (sprinklers). Actions associated with the rehabilitation of Arlington House and its outbuildings will diminish the historic characteristics in both the short- and long-term, resulting in adverse minor impacts to the Arlington House National Register property (no adverse effect under Section 106). Adverse long-term minor impacts would occur to the National Register property because of the installation of the new mechanical bunker and comfort station (no adverse effect under Section 106). Beneficial long-term minor impacts would occur from of stabilization of the Arlington House, and beneficial long-term moderate impacts would occur because of the rehabilitation of the Slave Quarters and the Kitchen Garden to its 1861 appearance. These impacts would result in no adverse effect under Section 106. Adverse short-term minor impacts to the overall cultural landscape of Arlington House will occur during construction. Adverse long-term minor impacts to the cultural landscape will occur as a result of constructing the new mechanical bunker and the comfort station. Beneficial long-term minor impacts to the cultural landscape would occur from the stabilization of the Arlington House, and moderate long-term beneficial impacts related to the rehabilitation of the Kitchen Garden and installation of new fire and climate management systems into contributing buildings.

Adverse short-term minor to moderate impacts to visitor use and experience could occur during construction phase of this project as a result of limited access to the buildings and site. While there would be adverse short-term impacts as a result of construction activities associated with this alternative, the installation of a new fire suppression and climate management system and fully ADA compliant comfort station would result in beneficial long-term minor impacts. The installation of a new fire suppression and climate management system would have beneficial long-term minor impacts to public health and safety, although adverse short-term negligible to minor impacts will occur as a result of construction activities. Park operations and management will experience adverse short-term minor impacts during rehabilitation activities. However, by resolving drainage problems and installing new and modern mechanical systems, less future maintenance would be required, resulting in beneficial long-term minor impacts.

Degree of effect on public health or safety: Implementation of the selected alternative could result in adverse short-term negligible to minor impacts to human health and safety resulting from construction activities. However, beneficial long-term minor impacts to public health and safety will occur as a result of updating the climate management and fire suppression systems. Updating the climate management system will regulate and reduce the current high temperatures and humidity levels experienced inside Arlington House during the summer, thereby reducing the potential for heat-related illnesses and improving the overall health and safety of both park visitors and staff. By installing a new automated fire suppression system the potential for loss of life and property in the event of a fire would be greatly reduced.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas: Arlington House, The Robert E. Lee Memorial, is located in the center of the roughly 200-acre Arlington National Cemetery, Arlington, Virginia, and is administered under the authority of the George Washington Memorial Parkway, National Park Service (NPS). Arlington National Cemetery is administered by the Department of the Army, and was officially designated as a military cemetery June 15, 1864, by Secretary of War Edwin M. Stanton. Currently there are more than 300,000 people buried within Arlington National Cemetery, and conducts approximately 6,400 burials each year.

More than four million people visit the cemetery annually, many coming to pay final respects at graveside services. Visitor facilities at the cemetery include the visitor's center, the Memorial Amphitheater, the Tomb of the Unknowns, and dozens of different monuments. Located by the cemetery entrance, the visitor center provides maps, guidebooks, exhibits, information services (to include grave locations), a bookstore, and restrooms. About 5,000 visitors attend each of the three major annual Memorial services in the Memorial Amphitheater. They take place on Easter, Memorial Day, and Veterans Day and are sponsored by the U.S. Army Military District of Washington. On March 4, 1921, Congress approved the burial of an unidentified American soldier from World War I in the plaza of the new Memorial Amphitheater.

No wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas have been identified within or adjacent to the project area and will not be affected. No sites sacred to American Indians or other significant ethnographic resources are known to occur in the general proximity of the park's boundaries.

Degree to which effects on the quality of the human environment are likely to be highly controversial: No highly controversial effects were identified during either preparation of the EA or the public comment period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: No highly uncertain, unique or unknown risks were identified during either preparation of the EA or the public comment period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The selected alternative neither

establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts: As described in the EA, adverse long-term minor cumulative impacts were identified for vegetation. Visitor use and experience and human health and safety will experience beneficial long-term minor cumulative impacts. In addition, there will likely be adverse long-term minor cumulative impacts to park operations and management as a result from the potential increase in visitation due the current and future planned expansion of Arlington Cemetery. No adverse or beneficial cumulative impacts were identified for soils, archeological resources, museum collections, historic districts and structures, or cultural landscapes as a result of the rehabilitation of Arlington House, outbuildings, and grounds.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: In order to identify potentially significant archeological resources, Phase 1 Archeological Investigations were conducted and, with few exceptions, had not located significant resources within the area of potential effect for the rehabilitation project and had “cleared” the construction locales. Those areas where significant resources were discovered: e.g. the dairy dry well in the Arlington House basement and the hearth remains in the South Slave Quarters (Selina Grey’s Room) will be avoided during construction and preserved. As described in the EA, activities that will require subsurface excavation or ground disturbing activities could have negligible adverse long-term impacts to archeological resources. However, these impacts will be fully mitigated through archeological monitoring during construction and documentation of any significant finds. Museum collections will be at some short-term risk of accidental damage during transport prior to construction activities, which could result in adverse long-term minor impacts. However, beneficial long-term minor impact to the museum collections will occur from the implementation of climate controls and fire suppression systems.

Construction activities associated with the installation of the new fire suppression and climate management system and the overall rehabilitation of Arlington House and its outlying buildings will diminish characteristics of the National Register listed buildings but will maintain the integrity of the buildings’ character-defining features, thus causing adverse short-term minor impacts to the Arlington House and the Slave Quarters. The long-term presence of sprinklers, smoke detectors, and duct vents within the structures will also diminish the historic characteristics within Arlington House and the Slave Quarters, and will result in adverse long-term minor impacts (no adverse effect under Section 106) and will not jeopardize their National Register eligibility. Mitigation measures will be initiated to ensure these impacts are minimized. For example, sprinklers will only be installed in non-ornate plaster ceilings, smoke detectors will be applied atop historic surfaces, and duct vents will be small, placed inconspicuously, and painted to match historic paint colors. Adverse long-term minor impacts will occur to the National Register property because of the new comfort station (no adverse effect under Section 106). Beneficial long-term minor impacts will occur from stabilization of the Arlington House, and beneficial moderate long-term impacts will occur because of the rehabilitation of the Kitchen Garden to its 1861 appearance. These impacts will result in no adverse effect under Section 106.

Demolition of the non-contributing 1921 comfort station will benefit the historic site by returning it closer to its historic 1861 appearance, the site’s period of significance. Construction of a new comfort station or installation of a temporary modular structure, however, will introduce a new element into the boundaries of the historic property. To minimize this impact, a screening devise will be installed as a mitigation measure that will limit the views of the new building or structure from the grounds. As a result, construction of the new comfort station or installation of a temporary structure will have adverse short- and long-term minor impacts on the overall Arlington House National Register property (no adverse effect under Section 106).

During construction activities, adverse short-term minor impacts to the Arlington House cultural landscape will occur. Adverse long-term minor impacts to the cultural landscape will occur from actions related to the placement of the new mechanical bunker and comfort station. Beneficial long-term minor impacts to the cultural landscape will occur from the stabilization of the Arlington House, and moderate long-term beneficial impacts related to the rehabilitation of the Kitchen Garden and installation of new fire and climate management systems into contributing buildings. As a result of these findings, the Park concluded that under Section 106, no adverse effect will occur because of these actions. The Virginia State Historical Preservation Office later concurred with this opinion of no adverse effect.

In accordance with Section 106 of the National Historic Preservation Act, NPS used the NEPA process to comply with Section 106. In a letter to the Virginia SHPO dated May 22, 2006, the Park initially requested concurrence to a “no adverse effect” finding for the project. With the letter, the park provided the EA, Archeological Report, Historic Structures Report, and 40 and 75 percent design drawings. The Park then received follow-up inquiries from the VA SHPO staff in letters of June 22, 2006 and July 7, 2006 regarding the project that were answered in letters from the Park dated July 28, 2006 and August 15, 2006. The Park received responses from the VA SHPO staff concurring to the no adverse effect finding in a letter dated September 15, 2006 specifically addressing rehabilitation strategies, and an e-mail dated January 12th, 2007 addressing the entire project (including archeology).

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: As described in the EA, the NPS has coordinated with the U.S. Fish and Wildlife Service and, based on the results of correspondence, dated March 27, 2006, it was determined that no federally listed or proposed threatened or endangered species are known to occur within the project area, and that the selected alternative will have no effect on any such species.

Whether the action threatens a violation of federal, state, or local environmental protection law: The selected alternative violates no federal, state, or local environmental protection laws. The rehabilitation of Arlington House, outbuildings, and grounds will be consistent with all existing local, state, and federal regulations.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The National Park Service Organic Act of 1916 and related laws mandate that the units of the national park system must be managed in a way that leaves them “unimpaired for the enjoyment of future generations”. These laws give the NPS the management discretion to allow certain impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. Director’s Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. In addition, the decision document will summarize impacts and whether or not such impacts may constitute an impairment of park resources or values. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

1. necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
2. key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
3. identified as a specific goal in the park’s general management plan or other relevant NPS planning documents.

The NPS has determined that implementation of the selected alternative will not constitute an impairment to Arlington House, the Robert E. Lee Memorial or the George Washington Memorial Parkway. This conclusion is based on a thorough analysis of the environmental impacts described in the Rehabilitation of Arlington House, Outbuildings, and Grounds Environmental Assessment, the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies* (2006). Although there will be some negative impacts, in all cases these adverse impacts are the result of actions taken to preserve, protect, and restore other park resources

and values. Overall, the rehabilitation of Arlington House, its outbuildings, and grounds results in benefits to park resources and values and opportunities for their enjoyment, and does not result in their impairment.

PUBLIC INVOLVEMENT

In June and August of 2004, and February 2005, an interdisciplinary project team (IDT) conducted a series of mini-value analysis workshops to identify the preferred alternative to best meet the overall purpose and need of the proposed action. Location for a new comfort station was limited to the historic area because of restricted NPS land ownership within Arlington Cemetery, space limitations within existing NPS buildings outside the historic area, and to maximize convenience for visitors. Participants considered the 1966 Master Plan, the 2001 Cultural Landscape Report, and the Site Manager's proposed draft Master Plan revisions in the Value Analysis, especially in regards to the Potting Shed, location of comfort station and mechanical bunker, and extent of Kitchen Garden. During the workshop, the park developed several design and layout alternatives for the proposed support facilities.

The project team determined that public scoping would be conducted via public comment on the *Rehabilitation of Arlington House, Outbuildings, and Grounds EA*, which was released for public comment on June 12, 2006. The EA was mailed to 24 individuals, agencies, and associations for review and comment. Kendell Thompson, the Park Site Manager, personally contacted and solicited comments from the Black Heritage Museum of Arlington, the Arlington Historical Society, the Superintendent of Arlington Cemetery and the Historian for Fort Meyer. Copies of the EA were also made available for public review at the Virginia (History) Room of the Arlington Central Public Library, and at the Park.

The Park also held an open-house type public meeting on Saturday, July 15 in the park's conference room at Arlington House, The Robert E. Lee Memorial, where three people signed in and two provided comments. The EA was also made available for public review on the National Park Service's Planning, Environment, and Public Comment (PEPC) website. The public comment period on this EA ended on Friday, July 21, 2006.

During the public comment period the National Park Service received three comments. The first comment supported the selected alternative. The second comment received from the Fort Myers Fire and Emergency Services emphasized that the designers of the new fire suppression system need to make sure the current fire alarm system can hold the additional sprinkler alarm zone age. The third comment emphasized the need to communicate to the public that during the renovation process Arlington House will not be completely closed and unavailable. The National Park Service appreciates the consideration and thought put into these comments and responds as follows:

1. Support for the selected alternative was noted.
2. The existing fire detection and alarm systems within all historic structures at Arlington House will be replaced by a new fire detection and alarm system with a new addressable panel located in new mechanical bunker. However, until replacement by new detection system, the existing fire detection systems within historic structures (not rehabilitated in first phase) will be "patched" into the new addressable panel in the new mechanical bunker.
3. The park will increase the amount of public interpretation during the rehabilitation to emphasize the importance of the 1861 historic landscape, provide visitors information regarding the problems Arlington House is experiencing and how those problems are being rectified, and the expected timetable of scheduled activities. In addition, visitors will continue to have access to the south and east sides of Arlington House. Visitors will be able to acquire brochures and information pertaining to the site. They may visit the flower garden in the front of the house and see the Robert E. Lee Memorial with a beautiful panoramic view of Washington, D.C. They may visit the South Slave Quarters where Selina Gray lived and see the replica of Freedmen's Village. They may also visit the Potting Shed, the East Kitchen and the bookstore. The public will also have an opportunity to visit the Civil War Memorial which is in close proximity to the flower garden.

CONCLUSION

The proposed action does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The action will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. The action would not impair any park resource or values necessary to fulfill specific purposes identified in the area's enabling legislation. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this action and thus will not be prepared.

Recommended:

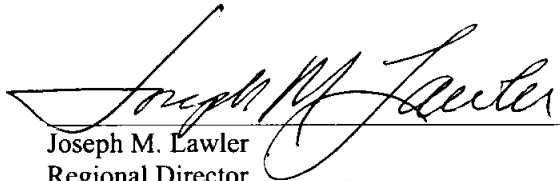


David Vela
Superintendent,
George Washington Memorial Parkway

8-14-07

Date

Approved:



Joseph M. Lawler
Regional Director,
National Capital Region

8/15/07

Date