

# **DRAFT FINDING OF NO SIGNIFICANT IMPACT AND DECISION NOTICE FOR ARLINGTON NATIONAL CEMETERY SOUTHERN EXPANSION AND ASSOCIATED ROADWAY REALIGNMENT**

## **TITLE OF ACTION**

Environmental Assessment for Arlington National Cemetery Southern Expansion and Associated Roadway Realignment.

## **PROPOSED ACTION**

Arlington National Cemetery (ANC), a Direct Report Unit of the Headquarters, Department of the Army (HQDA), proposes to establish a single, contiguous parcel of land south of the cemetery by closing, relocating, and realigning local roadways and develop the parcel to increase interment capacity. The project creates an opportunity to increase multimodal transportation while upgrading safety and capacity levels along this portion of Columbia Pike. The Environmental Assessment (EA) simultaneously addressed the establishment and development components of this action with the Federal Highway Administration Eastern Federal Lands Highway Division (FHWA-EFLHD), Virginia Department of Transportation (VDOT), U.S. Environmental Protection Agency (USEPA), the National Capitol Planning Commission (NCPC), and Arlington County as cooperating agencies. The realignment of Columbia Pike and the Route 27 (Washington Boulevard)/Columbia Pike interchange is integral to a successful ANC expansion. The EA assessed the potential impacts of the realignment to ensure that the cumulative effects of the collective federal actions – roadways and cemetery expansion – were considered.

The Proposed Action includes: the closure and removal of Southgate Road; the construction of a new access road for traffic to/from Joint Base Meyer-Henderson Hall (JBMHH); the realignment of Columbia Pike; the modification of the Route 27 interchange at Columbia Pike; the development of the space for cemetery use, including integration of the Air Force Memorial (AFM); and the conversion of Patton Drive – from South Gate to Eisenhower Drive – to a pedestrian trail. The new access road would include traffic control – signage, speed limits, etc. – to meet Arlington County and VDOT design standards. The undertaking also involves land acquisitions to accomplish the project.

The EA, incorporated by reference into this finding, analyzed the potential environmental consequences of activities associated with the proposed improvements needed to address the purpose and need. The EA also discussed avoidance and minimization of environmental impacts, and considered cumulative environmental impacts with other reasonably foreseeable future actions, including cumulative environmental impacts with other projects at ANC and the surrounding area.

This EA is tiered<sup>1</sup> from the 2014 ANC Real Property Master Plan Programmatic Environmental Assessment (RPMP PEA) and contains references to and summaries of that document. The earlier document contained development alternatives of the Southern Expansion site including “Alternative 4 – Southern Expansion Site with Realigned Roadways.” This EA contains a robust analysis of Alternative 4 from the PEA.

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<sup>1</sup> Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review. (40 CFR §1502.20 *Tiering*.)

## PURPOSE AND NEED

The Proposed Action is needed to meet the forecasted interment/inurnment demands of eligible veterans and to preserve ANC as an active military cemetery. The purpose of the Proposed Action is to establish a single contiguous parcel burial space for ANC through the realignment of roadways allowing several noncontiguous parcels to merge and the redevelopment of the resulting area. The Proposed Action also would create the opportunity to maintain adequate multimodal access, levels of service, and safety for the affected roadway network and interchange ramps, and transit, including this portion of the Columbia Pike Corridor.

The U.S. Army and ANC assessed the potential environmental consequences associated with the Proposed Action pursuant to provisions of the National Environmental Policy Act (NEPA), 42 United States Code (USC) 4321 to 4270d, implementing Council on Environmental Quality (CEQ) Regulations, 40 Code of Federal Regulations (CFR) 1500-1508.

## ALTERNATIVES EVALUATED

Three action alternatives – the Preferred Alternative and two others – and the No Action Alternative were reviewed in accordance with NEPA as implemented by the regulations of the CEQ. The No Action Alternative represented the baseline to compare the remainder of the alternatives analyses. Alternatives 1-3 each include all of the actions listed under “Proposed Action;” the differences among the alternatives are as noted below. The alternatives included:

1. Relocate Operations Complex Alternative with an Underpass Alternative (*Preferred*). This alternative follows the guidance provided in ANC’s Real Property Master Plan – develop in a manner that represents the best use of the land. This alternative proposed the best land use opportunity to support the ANC mission by relocating the Operations Complex from its current location to the area south of Columbia Pike, and to connect it to the Southern Expansion area of the cemetery by an underpass.
2. Maintain Operations Complex with an Underpass Alternative. This alternative would maintain the Operations Complex in its current location and would have an underpass for maintenance vehicle access to the parcel south of Columbia Pike.
3. Maintain Operations Complex without an Underpass Alternative. This alternative would maintain the Operations Complex in its current location and would not have an underpass to access the parcel south of Columbia Pike.
4. No Action Alternative. The No Action Alternative is defined as no comprehensive development, including no realigned roadway network, and no additional contiguous land available for burials. Choosing no action would result in the loss of 40,000-60,000 potential interment opportunities and not extending the life of the cemetery. This alternative also would not comply with the National Defense Authorization Act (NDAA) of 2000 (Subtitle F Section 2881) and subsequent amendments, and the NDAA of 2017. NDAA 2000 and amendments required the Secretary of Defense to transfer the Navy Annex property to the Secretary of the Army and to incorporate the Navy Annex property into the cemetery, and to develop a master plan for it. NDAA 2017 further specified that the Secretary shall acquire and remove existing barriers and realign roadways and the interchange “for purposes of ensuring maximization of interment sites and compatible use of adjacent properties, including any appropriate cemetery or memorial parking.”

The three action alternatives provided similar development plans and identical roadway realignments, but differed in the amount of contiguous acreage available to increase burial capacity. The Preferred Alternative created a 49-acre contiguous parcel; the two other action alternatives each created 38-acre contiguous parcels.

## DECISION

ANC's decision for the Proposed Action is to implement the Preferred Alternative for cemetery development including relocation of the ANC Operations Complex and roadway closure and realignment of Southgate Road and Columbia Pike. The anticipated construction could begin as early as 2020, pending environmental review, design and land acquisition, with completion as early as 2025.

## SUMMARY OF FINDINGS

The EA finds that no significant adverse effects would result from implementing the Preferred Alternative.

1. Land Use and Sustainability – The impacts in the short term would be the transition from unimproved to improved condition. The expansion site and surrounding area would experience a large construction project – noise, heavy equipment, earth moving, etc. Redevelopment in the long-term would improve the character of the site; improvements would be compatible with surrounding land uses. In the long-term, the change from unused Army-owned land to cemetery use would preclude the possibility of widening the Columbia Pike corridor, if needed. The Preferred Alternative supports the Army's sustainability policies by: reducing the amount of impervious surface and increasing the amount of open space when compared to the 2006 conditions, which included the Navy Annex facilities; reusing previously developed land; using Best Management Practices (BMPs) during construction; and, using a location that provides multimodal transportation options.
2. Air Quality – There would be temporary impacts resulting from construction vehicle air emissions and fugitive dust; however, the short-term impact would not have local or regional significance. Emissions associated with construction were compared to the Clean Air Act (CAA) *de minimis* values with respect to General Conformity, the estimated emissions were below these values and therefore the Proposed Action is presumed to conform to the State Implementation Plan. The use of BMPs during construction, e.g. spraying water on disturbed/exposed soil areas, would minimize impacts from fugitive dust. Minimizing equipment idling during construction would reduce temporary air quality impacts. In the long-term, a multimodal transportation corridor may help reduce vehicular traffic thereby reducing air emissions.
3. Noise – There would be temporary impacts from construction noise, primarily heavy equipment. The construction project would adhere to VDOT's construction noise limits and Arlington County's local noise ordinance. Long-term impacts would include an increase in noise due to honor salutes, but the audible impact would be negligible or minor. Other long-term impacts would include vehicular traffic on the proposed South Nash Street; based on traffic modeling, the potential noise would not exceed VDOT's noise abatement criteria or its substantial noise increase criteria. Once operational, maintenance and cemetery operational noise would be minor. Potential noise emanating from the relocated Operations Complex would be similar to the neighboring VDOT maintenance facility. Specialized vehicles at the Operations Complex include mowers, off-road utility vehicles, backhoe loaders, mini off-road dump trucks, etc. for daily operations and

maintenance. The proposed design elevation of the relocated Operation Complex would be lower than Columbia Pike which would act as a buffer to further reduce potential noise impacts.

4. Topography, Soils, and Geology – The final cemetery and roadway designs would be based on geotechnical investigations. Potential impacts would be minor and effects would be mitigated by adherence to stormwater management plans and use of BMPs. The change in topography of the cemetery expansion would have a positive impact as it would reflect the image and character of ANC. The cemetery design would eliminate the need for slope stabilization for the slope on the east side of the AFM.
5. Water Resources – Potential temporary stormwater impacts during construction would be avoided or minimized using BMPs and following the Virginia Department of Environmental Quality (VDEQ) requirements for preparing an erosion and sedimentation control plan. All development would be planned and designed to avoid sensitive areas and would be consistent with the Virginia Coastal Zone Management Program to the maximum extent practicable. There would be no direct impacts to surface water bodies, groundwater, floodplains, or wetlands. There would be a significant reduction in impervious surfaces from the 2006 condition, resulting in a reduction of stormwater runoff and pollutant loads.
6. Biological Resources – There would be no impact on any federally- or state-listed threatened or endangered species. The site was disturbed previously and does not contain natural habitat. Regardless, there would be a temporary disruption to wildlife inhabiting the Southern Expansion site. Upon the start of construction, wildlife species instinctively would move to adjacent areas. The temporary impact would be offset at the project completion by providing permanent positive impacts with new landscaping including turf, trees, shrubs, and other plant material in planting beds that will be native to and compatible with the geographic region. There would be a net increase in vegetation as native wildlife species re-inhabit the site upon completion.
7. Cultural Resources – Adverse effects to properties listed in or eligible for the National Register of Historic Places (NRHP) have been identified. The adverse effects will be resolved through mitigation measures stipulated in a Memorandum of Agreement, which is being finalized. The impacts include the removal of the boundary wall along Southgate Road, conversion of part of Patton Drive to a pedestrian trail and relocation of the Operations Complex, all contributing to the ANC NRHP-listed historic district; and modification of the Air Force Memorial site, which has been determined NRHP eligible. The Memorandum of Agreement between the State Historic Preservation Officer, Air Force District of Washington, and ANC, resolves adverse effects to cultural and historical resources. This Memorandum of Agreement includes the mitigation necessary to offset the adverse effects, and is located in the Appendices of the EA. With the conclusion of this agreement there will be no significant impacts to cultural resources.
8. Visitor Use and Experience – Temporary impacts from dust and noise may be experienced due to increased construction traffic and other activities during the project's construction. Any impacts would cease upon completion of the construction activities. These impacts would be isolated to families with loved ones directly adjacent to the construction area. Family members wishing to visit one of these gravesites would be provided either escorted or pre-arranged access, to minimize interruptions/intrusion of construction activities during the visit. The proposed construction would not preclude any family member from visiting a gravesite. While vehicular access to and parking at the AFM would be eliminated, a larger parking lot across Columbia Pike will provide nearby access. In addition, pedestrian access would be enhanced from both Columbia Pike and ANC.

When Patton Drive is converted to a pedestrian trail, it will no longer be open to vehicular traffic; however, it will remain within the circulation routes. Gravesites along Patton Drive will still be accessible to pedestrians. New vehicular circulation roadways also will be available in the expansion area. There would be beneficial long-term impacts provided by new amenities including pedestrian gate(s) along the new boundary wall, thereby enhancing access to the Air Force Memorial, ANC, and 9/11 Pentagon Memorial Visitor's Education Center; and, a separate trails to accommodate pedestrians and bicycles, among others. The beneficial impacts would include expanding the footprint of the Cemetery to allow additional area for visitors to experience the history, heritage, honor, and sacrifice of our military service members.

9. Socioeconomic/Environmental Justice – The EA complies with EO 12898 – *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* by identifying and evaluating potential impacts and avoiding, minimizing, or mitigating them to the greatest extent practicable and permitted by law. Although the Foxcroft Heights community may have a population greater than 50% minority, there are no disproportionately high and adverse human health or environmental effects on this community. The project would not induce growth on a local or regional level; the area is already highly developed. The beneficial impacts include providing a visually attractive land use and creating the opportunity for improving multimodal transportation capacity to the general population. ANC provided public participation early in the NEPA process beginning with a public scoping meeting on April 27, 2016 to allow the public to give feedback on the Proposed Action and to discuss the scope of the NEPA document. Interim meetings were held with the Foxcroft Heights Neighborhood Association to provide a forum for discussion and update of the project. Most recently, a public open-house meeting was conducted on August 22, 2018 to disseminate information from the Draft EA and to gather comments.
  
10. Traffic and Transportation – There would be short-term traffic delays due to construction activities. Construction contractors would be responsible for minimizing delays by following an approved traffic management plan. The proposed redevelopment, including the realigned roadways and interchange, would maintain or extend routes for pedestrian and bicycle movements and would not sever any existing connections for these modes of transportation. According to the “Columbia Pike/Washington Boulevard Interchange Modification Report (2017), prepared by Kimley-Horn on behalf of the County, there would be no significant impacts to traffic or transportation due to the road realignment. There would be a positive effect on transportation through the opportunity to upgrade Columbia Pike into a multimodal facility as well as an improved level of service at the new tight diamond interchange and the Joyce Street/Columbia Pike intersection. HNTB Corporation, ANC’s consultant, has subsequently completed a traffic study and described the results in the Arlington National Cemetery – Southern Expansion Traffic Technical Memorandum – Future Conditions, dated April 15, 2019. It further validated the Interchange Modification Report’s results and included additional traffic counts along Columbia Pike corridor in October 2018. Its results will be used to inform roadway design improvements needed, due to this project. FHWA-EFLHD’s participation in this project has included assistance with the EA as a cooperating agency. In addition, FHWA-EFLHD will be designing the roadways that would be relocated as a result of the ANC expansion. Recently, FHWA-EFLHD, at the request of the County and VDOT, agreed to further traffic studies to further analyze the modified access to Route 27 (Washington Boulevard) with Columbia Pike. All roadways and trails will be constructed in accordance with American Association of State Highway Transportation Officials (AASHTO), VDOT, and National Association of City Transportation Officials safety (NACTO) standards.

11. Utilities – No currently used utility services or functions are being eliminated or scaled back as part of these projects. There would be potential short-term interruptions to utility service during construction. Utility providers would inform customers of extended interruptions or any change in current utility line locations. The current or future land use would not create a new burden on consumption of local or regional utility services. There would be no long-term disruptions to local utility customers after construction. Although concern has been expressed about potential constraint of the underpass on the utility corridor along the proposed realignment of Columbia Pike, the underpass will be buried to a depth sufficient to accommodate the utility corridor. In addition, utility capacity upgrades will be made during construction to address the need for future expansion. In addition, because water-, sanitary sewer- and stormwater-related utilities would otherwise require the most space in the corridor, those utilities would remain within the Cemetery avoiding the possibility of constraining the corridor. A beneficial long-term effect would be realized by the upgrading of aging utility infrastructure.
12. Solid Waste – Construction activities would generate solid waste. The contractors would be responsible for following acceptable protocol for avoiding or minimizing impacts from generating solid waste at the site. In the long term, there would be no noticeable increase in the amount of solid waste produced from daily operations and no changes to ANC's diversion rate or its adherence to the Integrated Solid Waste Management Plan (ISWMP).
13. Hazardous Waste and Materials – The Preferred Alternative would not cause a significant increase in the amount of hazardous waste generated at ANC in either the short- or long term. The incremental increase in the Cemetery's area and the maintenance required would not increase generation of hazardous waste. Earth disturbance during construction may create a risk of exposure to Asbestos Containing Material (ACM), residue from the FOB2 demolition and clean-up. Designing to avoid ACM-contaminated soil and developing a construction-phase pollution prevention plan minimizes the risk. Documentation of a recent investigation would follow the Defense Environmental Restoration Program (DERP) requirements for achieving "No Further Action" status with VDEQ and USEPA. The quantity of hazardous materials used at the Operations Complex is not expected to increase due to the relocation. A full inventory of hazardous materials would be completed prior to demolition of the Operations Complex.
14. Visual and Aesthetic Resources – There would be temporary impacts during construction due to presence of heavy equipment and construction activities for both utility and road relocation. In the long-term, the redevelopment of the site would provide a visual improvement to the land. The relocation of the Operations Complex to an area on the edge of the proposed expansion area would benefit the viewshed, making the expansion seamless. The centrally located AFM, coupled with proposed landscaping and earth moving, would act as visual barriers to shield the relocated Operations Complex from most of the Southern Expansion site. The AFM would be incorporated into and connected to the Cemetery. There would be a long-term positive impact on the viewsheds.

The project will comply with all federal, state, and local laws.

## **PUBLIC INVOLVEMENT**

Early agency coordination was accomplished in accordance with the NEPA process through invitations to five agencies – FHWA, USEPA, NCPC, VDOT, and Arlington County, VA – to become cooperating agencies. All five agencies accepted and participated as such. A cooperating agency kick-off meeting was held on March 9, 2016, and coordination was conducted at key points in the process. Throughout the NEPA process and development of the EA, ANC coordinated with the cooperating agencies and considered their input.

Further outreach efforts included 42 invitations to a variety of organizations including governmental agencies, non-governmental organizations, and federally-recognized Native American tribes. They all received invitations to consult on the project.

A Notice of Intent to prepare an EA was published in the Federal Register on April 20, 2016. ANC issued a press release, and public notices were also published in the Washington Post, the Washington Times and the El Tiempo Latino newspapers, and on ANC's and the U. S. Army Corps of Engineers' (USACE) websites. Brochures regarding the project were mailed to approximately 250 property owners, agencies, and civic leagues located near the project site and Columbia Pike. ANC and USACE also posted information on its websites for the expansion project during the NEPA process.

On April 27, 2016, a press conference and an open-house-style NEPA public scoping meeting were held at the Sheraton Pentagon City, Arlington, Virginia. Storyboards describing the project and the NEPA process were displayed. USACE, ANC, representatives from all five cooperating agencies, and consultant's staff, as well as a Spanish-language interpreter were available to answer questions and obtain comments. Project brochures were also available. More than 75 people attended the scoping meeting. The public had an opportunity to provide written comments during the meeting, as well as throughout the comment period from April 20 through May 31, 2016.

A Notice of Availability of the Draft EA and notice of a public meeting was published on August 16, 2018, for a 30-day public comment period. The second public meeting was held on August 22, 2018 to disseminate information from the Draft EA and to gather comments on the Proposed Action. This was an open-house type meeting with approximately 51 people attending.

Numerous comments/suggestions were received regarding bicycle and pedestrian infrastructure along the Columbia Pike corridor. ANC is sensitive to the public's concerns; however, the conceptual realigned roadway and trail corridor widths are not unlimited. The conceptual roadway design presented in the Draft EA is a generic depiction. It is in keeping with state and local policies for "complete streets," and will preserve the bicycle and pedestrian trail link between Southgate Road and South Joyce Street via the proposed South Nash Street and Columbia Pike. Based on comments received, separate bicycle and pedestrian trails – to connect with Arlington County's existing trails to the Pentagon – are proposed. The public's specific design suggestions were passed on to the design team. The roadway and trails are still under design at this time. The final design, including actual widths of the realigned Columbia Pike right-of-way, is outside the scope of the EA and this Finding of No Significant Impact (FONSI). The realigned roadway will include the appropriate level of bike/pedestrian infrastructure that is consistent with Virginia Department of Transportation/American Association of State Highway Transportation Officials/National Association of City Transportation Officials (VDOT/AASHTO/NACTO) standards and Arlington County's Columbia Pike design standard.

As stated previously under “Traffic and Transportation”, FHWA-EFLHD has indicated to ANC that all decision-making to-date concerning the EA is agreeable to them, and that FHWA-EFLHD intends to adopt the ANC Southern Expansion EA and issue its own FONSI, if appropriate, following the completion of the traffic studies.

### **FINDING OF NO SIGNIFICANT IMPACT**

Based on the information and analyses contained in the EA as well as the discussion contained herein, I find that the implementation of the Preferred Alternative – Relocate Operations Complex – to establish a single contiguous parcel of land south of the cemetery by closing, relocating, and realigning local roadways, develop the parcel to increase interment capacity, and create an opportunity to increase the capacity for multimodal transportation while upgrading safety standards and capacity levels on this portion of Columbia Pike will have no significant impact on the human environment. Pursuant to 40 CFR Part 1501.4 – regulations implementing the procedural provisions of the National Environmental Policy Act – an Environmental Impact Statement will not be prepared. The signing of this Finding of No Significant Impact completes the ANC’s NEPA process.

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Ms. Karen Durham-Aguilera  
Executive Director  
Army National Military Cemeteries and  
Arlington National Cemetery

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Date