

**RESPONSE TO COMMENTS ON ENVIRONMENTAL ASSESSMENT
AIR FORCE MEMORIAL, NAVAL ANNEX SITE
ARLINGTON COUNTY, VIRGINIA**

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1.0 PURPOSE. This document (1) summarizes and responds to public and agency comments on the *Environmental Assessment, Air Force Memorial*, March 2003; and (2) supports a Finding of No Significant Impact (FONSI) for construction and operation of the Air Force Memorial at the Naval Annex Site, Arlington County, Virginia.

2.0 PUBLIC INVOLVEMENT. The Washington Headquarters Services (WHS) and the Air Force Memorial Foundation (AFMF) made the following diligent efforts to involve and inform the public, including those persons and agencies who may be interested or affected by the Memorial, pursuant to the National Environmental Policy Act (NEPA) regulations of the Council on Environmental Quality (CEQ) (40 CFR 1506.6, Public involvement).

2002

April	Presentation to Tan Son Nhut Association Reunion in Alexandria, VA.
June	Presentation to Senator John Warner.
June	Presentation to Senate Armed Services Committee Staff.
June	Presentation to Congressman Frank Wolf.
June	Presentation to Arlington County Board Chair.
June	Presentation to Penrose Neighborhood Association in Arlington VA.
July	Presentation to Commission of Fine Arts (CFA) Staff.
July	Presentation to National Capital Planning Commission (NCPC) Staff.
August	Presentation to the Columbia Pike Revitalization Organization.
September	Presentation to National Park Service Staff.
September	Presentation to Metropolitan Washington Airports Authority.
September	Presentation to Congresswoman Constance Morella.
September	Presentation to Congressman James Moran.

2002 (continued)

September Presentation to Airline Pilots Association in Arlington, VA.
 September Presentation to individual Arlington County Board Members.
 October Presentation to Deputy Under Secretary of Defense (Installations & Environment).
 October Application to Federal Aviation Administration (FAA) for Air Hazard Determination.

2003

January Presentation to Office of the Secretary of Defense (OSD) environmental staff officers.
 February Presentation to Senator Tim Hutchinson.
 March 3 Presentation to Virginia State Historic Preservation Office (SHPO) and Project Review Submission under Section 106 of the National Historic Preservation Act.
 March 5 Press Release (Appendix 6.1) & Press Event, Sheraton National Hotel, Arlington, VA.
 March 12 Presentation to National Capital Planning Commission (NCPC).
 March 20 Presentation to Commission of Fine Arts (CFA).
 March Presentation to DC Historic Preservation Office and Project Review Submission as recommended by the NCPC.
 March 28 Environmental Assessments (EAs) made available on WHS website <http://www.dtic.mil/ref/Safety/index.htm> and at four Arlington County libraries, the Pentagon Library, and Navy Annex. EAs sent to 70 Federal, DoD, State, County, and DC officials, interested organizations, and individuals. The Initial Distribution List is Appendix C in the EA.
 March 31 Publication of Notice of Availability of EA for 30-day review and comment period in The Washington Post & The Journal (Northern Virginia Newspapers) (Appendix 6.1).
 April 3 Notice of Availability of EA, 68 Federal Register 16264 (Appendix 6.1).
 April 11 EAs sent to Virginia Department of Environmental Quality (VDEQ) Office of Environmental Impact Review to coordinate review by various State agencies.
 April Presentation to 9/11 Families and Memorial Committee in Arlington, VA.
 April Presentation to Arlington County Heritage Committee in Arlington, VA.
 May 5 Public comment period closed.
 May Presentation/Exhibit at the DOD Joint Services Open House, Andrews AFB, MD.
 June Presentation/Exhibit at the Centennial of Flight's Gala Aviation Art Exhibit & Reception in Washington, DC.
 July Presentation to Bethesda Rotary Club in Bethesda, MD.
 August Presentation to Sheraton National Hotel Management in Arlington, VA.

• **3.0 MEDIA COVERAGE.** The following articles were among many that appeared in print media concerning the Memorial from March to May 2003.

- Mr. Benjamin Forgey, "Reaching for the Sky, Air Force Memorial is a Soaring Design by James Ingo Freed," The Washington Post, March 6.
- WJLA, "Design Unveiled for New Air Force Memorial," WJLA.com, March 6.
- Ms. Heather Greenfield, "Air Force to Finally Get a Memorial," Associated Press, March 13.
- Times Publishing Company, St. Petersburg Times, March 13.
- Mr. Tom Steinfeldt, "Air Force Memorial Design Unanimously Approved," Journal, March 13.
- Mr. Ryan Self, "Air Force Memorial Design Unveiled," Arlington Sun Gazette (Journal), March 16.
- Mr. Bruce Rolfsen, "Climbing to the sky," Air Force Times, March 17.
- Mr. Peter Grier, "A Memorial on the High Ground," Air Force Magazine, April.
- Civil Engineering News, "A Design has been Chosen..." Civil Engineering, April.
- Ms. Deborah Snoonian, "Freed's design for Air Force Memorial near Pentagon is approved," Architectural Record, April.
- Ms. Jennifer Dowdell, "Freed At Last," Landscape Architecture Magazine, May.

4.0 AGENCY AND PUBLIC COMMENTERS. The following agencies and individuals provided comments on the Air Force Memorial. Appendix 6.2 contains letters and emails received by the end of the comment period.

- Mr. Benedict L. Sliney, Federal Aviation Administration (FAA), Determination of No Hazard to Air Navigation, January 8, 2003.
- Audience questions, Press Event, March 5, 2003.
- Mr. John G. Henry, Owings, Letter to Editor, The Washington Post, March 11, 2003.
- Mr. Frank G. Burke, Annandale, Letter to Editor, The Washington Post, March 29, 2003.
- Mr. John Huennekins, April 1, 2003.
- Mr. Harry G. Robinson III, The Commission of Fine Arts (CFA), April 4, 2003.
- Ms. Patricia E. Gallagher, National Capital Planning Commission (NCPC), April 7, 2003.
- Ms. Katherine K. Mull, Northern Virginia Regional Commission (NVRC), April 22, 2003.
- Mr. Dean Amel, Arlington County Environment and Energy Conservation Commission (E2C2), April 22, 2003.
- Mr. Tom Greenfield, Arlington County Planning Commission (ACPC), April 30, 2003.
- Ms. Carrie Johnson, Arlington County Planning Commission (ACPC), April 30, 2003.
- Ms. Ellie L. Irons, Virginia Department of Environmental Quality (DEQ), May 12, 2003, including comments from:
 - Mr. Derral Jones, Virginia Department of Conservation and Recreation (DCR), April 30, 2003.
 - Mr. Thomas Modena, DEQ Waste Division, May 5, 2003.
 - Mr. Kotur S. Narasimhan, DEQ Division of Air Program Coordination, April 25, 2003.
 - Mr. Martin Ferguson, DEQ Water Permits Support, April 29, 2003.
 - Mr. John D. Bowden, DEQ Northern Virginia Regional Office, May 5, 2003.
 - Ms. Katherine K. Mull, NVRC, April 22, 2003 (same as above).

5.0 SUMMARY OF COMMENTS AND RESPONSES. The following comments and questions were raised during the public involvement process. The coordinated response of WHS and the AFMF follows each comment.

5.1 Comments Regarding Height and Lighting of Memorial

Comment 5.1.a. Mr. Sliney, FAA: *It is hereby determined that the structure would not be a hazard to air navigation provided the following conditions are met:*

- *The structure should be marked and/or lighted in accordance with the FAA Advisory Circular on Obstruction Marking and Lighting.*
- *The FAA Form on Notice of Actual Construction or Alteration be completed and returned to FAA at least 10 days prior to start of construction and within 5 days after the construction reaches its greatest height.*
- *FAA be kept apprised as to the status of the project.*
- *The AFMF respond to periodic FAA inquiries.*

Response. The Memorial will be lighted in accordance with FAA standards and guidelines. It is expected that the spires will be lighted from below (see Response to Comment 5.1.b. and 5.1.c.). In addition, construction activities would be coordinated with the FAA.

Comment 5.1.b. Press Event: *How will the spires be lighted?*

Response: The spires will be softly lit from the bottom, while enhancing the brightness and curvature at the top 1/3 and the tips.

Specifically, this will be achieved via two lighting 'layers'. The first layer will create a soft glow and overall illumination at the lower portion of each spire. The luminaries will be located directly at the base of the spires, and would primarily serve an aesthetic purpose. This lighting would visually connect the lower part and upper part of the spire.

The second layer of lighting would be specifically targeted towards the upper portion of the spires, in which the upper 1/3 of each spire would be lit to a brightness of 15 foot-candles in order to comply with FAA regulations. Luminaries will be located near the base of each spire or located in adjacent areas of the site to provide the technically best-suited position that would visually enhance the spires while meet FAA requirements.

The lighting system would utilize energy efficient light metal halide sources along with the latest state-of-art optical/reflector technology as well as glare control system in order to minimize extraneous light and any potential glare.

Comment 5.1.c. Ms. Gallagher, NCPC: *The potential issue of hazard warning lighting requirements of the memorial as they pertain to visual effects, and the rulings required from the Federal Aviation Administration (FAA) that would guide the lighting of the memorial as a nearby air space obstruction do not appear in the EA. Commission recommends that a lighting scheme be pursued that does not include a flashing red light but utilizes another form of lighting to illuminate the memorial at night, to the satisfaction of FAA.*

Response. Compliance with FAA obstruction lighting standards does not require red lights like those on top of the Washington Memorial. The AFMF anticipates that lighting of the full spires from the ground, as conceptually planned, will satisfy FAA requirements. The lighting system will utilize narrow, focused beams to minimize extraneous light and potential glare. Also, see Response to Comment 5.1.b.

Comment 5.1.d. Press Event: *How do the spires compare with the actual height of the Washington Monument?*

Response. The Washington Monument is about 555 feet high on a base elevation of 30 feet, while the Memorial's highest spire would be 270 feet on a base elevation of 134 feet. Thus, the Washington Monument would be higher by about 181 feet $[(555 + 30) - (270 + 134)]$.

5.2 **Comments Regarding Traffic Routes, Parking and Access**

Comment 5.2.a. Press Event: *Access looks difficult - is there any access planning?*

Response. Master plans are currently being prepared, as a separate project, for both the Navy Annex Site and the Pentagon Reservation to help ensure accessibility between Arlington National Cemetery, the Air Force Memorial, the Pentagon 9/11 Memorial, and a possible Arlington County Memorial. The plans would address roads, sidewalks, and bicycle paths and are anticipated to be completed in 2004.

A traffic impact study is being prepared to address access issues for pedestrians, vehicles, and buses. This study includes key intersections adjacent to the site, and will examine the short-term and long-range plan for this area that includes the expansion of Arlington Cemetery. In addition, these issues will be coordinated with the New Columbia Pike Development Plans as adopted by Arlington County.

Comment 5.2.b. Mr. Huennekens: *Consider and recommend optimal access routes (and signage) for both construction and visitor vehicles that travel: southbound on I-395 from the direction of Washington DC; northbound on I-395 from the direction of Springfield, VA; and, southbound on the GW Memorial Parkway, or VA 110, or VA 27, from the direction of Memorial Bridge and Rosslyn.*

Ms. Johnson, ACPC: *The nature, routing and timing of construction trucks and related traffic, and advisory signage, should be carefully planned and monitored.*

Response. All road improvements will be coordinated with Arlington County Department of Public Works (DPW) and Virginia Department of Transportation (VDOT) concurrently. The final construction routes will be determined in coordination with VDOT. It should be noted that, during construction, all vehicles entering the Memorial construction site will have to report to the Pentagon Remote Delivery Facility, so construction traffic would be restricted to right turn only headed westbound on Columbia Pike and right only out of the site.

Signage for both visitors and construction traffic will be coordinated with VDOT. A sign inventory from the primary routes mentioned above should be augmented to include a reference to the memorial. This action will require coordination and approval by VDOT. Information regarding access routes for buses will be coordinated with specific bus companies.

Comment 5.2.c. Ms. Gallagher, NCPC: *Strongly encourage the Department to consult with the Washington Metropolitan Area Transit Authority (WMATA), the Virginia Department of Transportation (VDOT) and the Arlington County Government during the development of the Navy Annex master plan and the Pentagon revised master plan ... with the goal of improving pedestrian and vehicular connections and circulation patterns.*

Response. Comment Noted. DoD's consultants who are preparing the two master plans have consulted with WMATA, VDOT and the Arlington County government during its preparation. The plans are anticipated to be completed by the spring of 2004.

Comment 5.2.d. Mr. Amel, Arlington County E2C2, and Ms. Johnson, ACPC: *Pedestrian access to the memorial site from either the Pentagon or Pentagon City Metro stations is not straightforward... We urge you to develop directional signs for pedestrians. At a minimum, all street crossings on the paths to the memorial should be marked as pedestrian crossings, and the path through the Pentagon parking lots should be clearly delineated. Traffic signals that can be triggered by a pedestrian button should be considered for crossings that would otherwise be dangerous to foot traffic.*

Response. Comment noted. Pedestrian circulation in the area will be addressed in the master plans currently being prepared, as a separate project, for both the Navy Annex Site and the Pentagon Reservation. A new crossing would be created at the main entrance to the facility that would be accompanied by the appropriate advance warning signs and pavement markings in accordance with VDOT standards to ensure safe pedestrian access. In addition, provisions for a pedestrian signal are recommended as part of the construction of the entrance and realignment of the driveway on the south side of Columbia Pike.

Comment 5.2.e. Mr. Amel, Arlington County E2C2: *Lighting for pedestrian access, parking areas, and surrounding amenities should be planned to eliminate light pollution and save energy.*

Response. All lighting for the memorial, including lighting for pedestrian access, parking areas and surrounding amenities, is being planned with energy efficient, long life light sources such as metal halide, fluorescent and LEDs, also keeping simplified maintenance in mind. Specifically, the luminaires for the parking area would utilize energy efficient metal halide lamps and would have a shielded, low brightness design that would not have any upward component. Nearly all fixtures that have been identified for use on this project have shielding devices of some form, whether integral as part of the fixture design, or as an integral glare shielding accessory to avoid light pollution.

Comment 5.2.f. Mr. Greenfield, ACPC: *Remove the dedicated right turn lanes off Columbia Pike into the memorial parking entrance to the north and the auxiliary parking to the south. These additional lanes hamper pedestrians crossing these streets and dedicated turn lanes increase*

the speed of turning vehicles. Ensure that the turning radii on the corners of these streets meeting Columbia Pike do not exceed 15 feet as adopted by the County for Columbia Pike. Install a pedestrian activated signal to allow pedestrians moving from the auxiliary parking on the south side of Columbia Pike to move directly to the memorial. Ensure that a 57.5 feet of Right of Way is provided to Arlington County or VDOT on the AFM property to ensure that there is enough space for the Columbia Pike bikeways.

Response. Please see response to Comment 5.2.a. In addition, roadway plans would be reviewed with Arlington County DPW and VDOT. We will seek to attain the tightest minimum turning radius allowed by VDOT. Arlington County DPW will be consulted with respect to pedestrian and bicycle facilities along Columbia Pike. This entire effort will be viewed as an integral part of the Columbia Pike redevelopment initiative and, as such, will be reviewed and designed with those elements in mind.

Right turn lanes would allow tour buses to collect and distribute passengers and be separated from the through travel lanes. It is noted that the eastbound right turn lane is warranted based on VDOT standards due to existing traffic accessing the parking lot. Although the westbound right turn lane would not be warranted from a traffic volume perspective, it is desirable to provide a safer situation for tour buses to load and unload passengers. Subsequent to 2010, once the Navy Annex building is removed, parking associated with the Memorial would be located to the north of Columbia Pike, eliminating the need for pedestrians to cross the street at this location.

The need for a pedestrian signal should coincide with the forecasted demand and be installed when warrants for signalization are met. The importance of bike paths will be considered in the final planning documents.

Comment 5.2.g. Ms. Johnson, ACPC: *Bus routes to and from the site, as well as bus maneuvering and parking areas on site, need to be worked out carefully, especially as the Pentagon-area road network evolves.*

Response. This area will be addressed in the Master Plans currently being prepared, as a separate project, for both the Navy Annex Site and the Pentagon Reservation. The internal portion of the site has been properly sized to allow a limited number of buses to park without inhibiting access for vehicles or other buses.

Comment 5.2.h. Ms. Gallagher, NCPC: *Recommend that DoD and AFMF provide additional parking spaces if the planned number of parking spaces is insufficient.*

Response. Twenty-three parking spaces are being provided and a recently completed traffic study indicates that a maximum parking demand can be accommodated. Further, should the memorial ever reach peak demand, that would primarily be on weekends and ample additional parking is available within the existing parking area on the south side of Columbia Pike. In the future (post 2010), should these spaces prove insufficient, additional measures will be undertaken with Arlington Cemetery. It is recognized that provisions for special event parking will need to be taken in both Phase I and Phase II as indicated in Section 4.3.2 of the Environmental Assessment.

5.3 Comments Regarding Site Preparation and Maintenance

Comment 5.3.a. Press Event: *How will the Memorial be maintained?*

Response. The Army will eventually own the land, and the Superintendent of Arlington National Cemetery will maintain the Air Force Memorial site. In the interim, the site will remain in DoD custody and be supported by both DoD and the Air Force Memorial Foundation.

Comment 5.3.b. Press Event: *When will Wing 8 of the Navy Annex be demolished?*

Response. Utility moves are planned to begin in May 2004 with abatement and demolition to begin in late July and August 2004.

Comment 5.3.c. Ms. Gallagher, NCPC: *Recommend that DoD and AFMF keep the memorial open until 10:00 p.m. so that visitors can enjoy night views.*

Response. The AFMF and DoD plan to keep the memorial open to public until 10:00 p.m. and possibly 11 p.m. during the summer hours.

5.4 Comments Regarding Memorial and Site Design

Comment 5.4.a. Mr. Henry: *Memorial designers and selection panels sometimes seem to forget that the most meaningful memorials focus on human contributions, achievements and sacrifices. The U.S. Air Force Memorial will doubtless evoke many a puzzled look but few emotions.*

Response. According to the design statement, as mention in the EA (Appendix D), the proposed Memorial is rooted in the necessary symbolic transition of making the medium for the Air Force visible. Establishing the array of arcs against the sky are intended to evoke a modern image of flight by jet and space vehicles, representational of the United States Air Force. The three spires symbolize: 1) the graceful reach of the Air Force into the skies, including the Air Force demonstration team's "bomb burst" maneuver and a missile launch; 2) the "boldness" of a nation that transformed the Air Force into an independent service; 3) the Air Force's three core values and competencies; and 4) the three kinds of people that make-up the Air Force—active, retired and civilian (including families and the aerospace defense industry). Other complementary features that enhance a visitor's experience include an "unmatched" promontory overlook of the entire Washington skyline; the Air Force "star" encased in a granite floor below the spires; a parade ground; inscription walls, a contemplation area; and seating, walkways, and parking, all set in a heavily treed and grassed environment. The visitor's experience of the Memorial would be further reinforced by inscriptions and images engraved in granite and glass throughout the Memorial grounds. By its very design, the Air Force Memorial expresses the fundamental aspirations, spirit and accomplishments of the Air Force as it "soars to glory."

Comment 5.4.b. Ms. Gallagher, NCPC: *Study the removal of the honor guard statuary on the parade grounds because of its incompatibility with the memorial's striking contemporary design and possible interference with the ceremonial activities of the parade ground.*

Response. The need for an honor guard statue will be discussed during the final meeting with the NCPC.

Comment 5.4.c. Mr. Robinson, CFA: *At its meeting on March 20 the Commission of Fine Arts reviewed a new concept design for the Air Force Memorial by architect James Freed, and a new site locating the memorial at the Navy Annex in Arlington, Virginia, overlooking the Pentagon. This new scheme was enthusiastically and unanimously approved. Once again, Mr. Freed has provided an innovative design that has successfully integrated the symbols of the Air Force and expressed the poetry of flight. Its reference to the trajectory of aircraft in active maneuvers represented by three curved pylons soaring skyward is majestic and appropriate. The place of this memorial, sited sympathetically to others and visible from the Mall, is elegant and noble. We congratulate all those involved with this renewed undertaking and look forward to further review as the design develops.*

Response. Comment noted.

Comment 5.4.d. Ms. Johnson, ACPC: *The AFM should be coordinated and harmonized with additional elements, ranging from the proposed Arlington Heritage Center nearby, to interpretive roadside signage and a dramatic, artist-designed transformation of this section of Columbia Pike. Such features, developed by Arlington County and the National Park Service, could complement the Memorial's interior interpretive system to add scope and resonance to the visitor's experience.*

Response. The Foundation has and will continue to work with the Columbia Pike Revitalization Organization's architectural group, Arlington County, Arlington National Cemetery, the Black Heritage Museum of Arlington and other groups who have a vested interest along this area of Columbia Pike.

5.5 **Comments Regarding Agency Reviews**

Comment 5.5.a. Press Event: *What is scheduled with the NCPC and CFA?*

Response. The legislation gives the Secretary of Defense approval authority, but it still requires review and comment by the National Capital Planning Commission and the Commission for Fine Arts. The AFMF briefed the NCPC on March 12, 2003, and the CFA on March 20, 2003. Both commissions agreed with the conceptual design, and their comments are included in this document. A follow-up briefing is planned with both organizations.

Comment 5.5.b. Ms. Gallagher, NCPC: *Involve the District of Columbia Historic Preservation Office (DCSHPO) along with the Virginia State Historic Preservation Office (VASHPO), in its Section 106 consultation on the potential visual effects of the memorial. In particular,*

areas of the City of Washington south of the Anacostia River and in the southwest quadrant of the City appear to be overlooked in the present analysis.

Response. In a letter dated March 28, 2003, the Air Force Memorial Foundation sought the DCSHPO's concurrence with a finding of "no adverse effect" from the Air Force Memorial project to the surrounding area and nearby National Register properties. In their response, dated April 8, 2003, the DCSHPA concurred with the finding of "no adverse effect" with respect to District of Columbia properties.

Section 106 consultation is currently ongoing with the VASHPO. In an email correspondence between the VASHPO and the Air Force Memorial Foundation, the VASHPO indicated that, while the Air Force Memorial will be visible from many points in the area due to its height, because of the nature of the Area of Potential Effect, with tall structures and buildings already existing, and because of the Memorial design, with fairly thin, arcing elements rather than standing as a tall, solid building or structure, it does not appear that the Memorial will have an adverse effect because of its design. A final determination is awaited.

5.6 Comments Regarding Natural Resources

Comment 5.6.a. Ms. Gallagher, NCPC: *Pay particular attention to impacts on water quality such as increased storm water runoff and increased erosion potential. No specific actions or range of mitigation measures are indicated while alluding to state conformance requirements only.*

Response. As indicated in Section 4.4.3 of the Environmental Assessment, construction of the proposed Memorial would result in decreasing the amount of impervious surface within the AFM precinct, thereby reducing the amount of storm water runoff. To minimize the potential adverse impacts on storm water systems during construction, appropriate best management practices (BMPs) would be used to prevent construction sedimentation in the storm water runoff. In addition, the use of Low Impact Development Practices (LID) during detailed site design would be considered to manage storm water run-off and include measures such as providing grass swales to reduce runoff velocity and allow filtration along pedestrian pathways. Strict adherence to soil runoff prevention methods (silt fence, etc.) will be maintained and monitored.

Comment 5.6.b. Ms. Gallagher, NCPC: *Consider the potential for producing alternative forms of energy for project use.*

Response. Given the limited site area for the Memorial design, it is unlikely that the site will lend itself to the production of alternative forms of energy. On the other hand, the mechanical, electrical and lighting systems of the Memorial are being designed to minimize energy consumption. For instance, the lighting solutions for the project fully utilize proven, state-of-art light source technology. Metal halide lamps with 10,000-12,000 hrs life are being planned for the majority of overall illumination and for the spires. Light Emitting Diodes (LEDs) are planned for the glass walls and they have very low wattage (typically 1W modules) and extremely long life in excess of 50,000-100,000 hrs before replacement is

necessary. Areas such as service buildings will take advantage of fluorescent or compact fluorescent light sources, which are energy efficient.

Comment 5.6.c. Mr. Amel, Arlington County E2C2: *Plant species native to northern Virginia and choose tree species that will grow large enough to shade pathways leading from parking areas to the memorial, contemplation chamber and parade ground.*

Response. This plan will not include any species deemed “invasive” per the Arlington County Planning Department list. A landscape plan has been designed to include native species wherever possible, and plants and trees appropriate to the climate of the Washington, DC area (USDA Zone 7). The project team, in an effort to select material that will not only be appropriate to the site but also thrive in that location have worked closely with the DoD horticulturist, and the Arlington Cemetery arborist. Where there was not a general consensus for longevity of health and growth in any particular species, alternates were selected. The spread of canopies will eventually allow for shade over all of the parking area, the turn-around, the “viewing stand,” and the inscription walls.

Comment 5.6.d. Ms. Johnson, ACPC: *The project should comply with Arlington County’s new Chesapeake Bay Preservation ordinance as well as the County’s noise ordinance.*

Response. Due to the nature of the site, in close proximity to the Potomac River, the project plans will be reviewed with the Arlington County Environmental Division. As indicated in the discussion under Section 4.4.2 of the Environmental Assessment, the project would comply with the County’s Noise Ordinance. The AFM precinct does not fall within the Resource Protection Area (RPA) under Arlington County’s *Chesapeake Bay Preservation Ordinance*. General Performance Standards, as identified in the Ordinance, would be considered during the development of the site.

Comment 5.6.e. Ms. Irons, DEQ: *The EA does not address pollution prevention. DEQ encourages the proponents to implement pollution prevention principles in connection with all construction projects. These principles include reducing solid waste at the source, re-using materials, and recycling materials.*

Response. Executive Order 13148, *Greening the Government Through Leadership in Environmental Management*, April 21, 2000, imposes a number of voluntary and mandatory requirements on Federal agencies and their facilities, which may be applicable to this project. DoD and the AFMF are currently assessing these measures to formulate an effective pollution prevention plan that will be used during the construction of the Memorial.

Comment 5.6.f. Ms. Irons, DEQ: *In order to protect trees in the project area, the proponents should mark and fence them at least to the drip-line or the end of the root system, whichever extends farther from the tree stem.*

Response. A “Tree Protection Plan” will be prepared prior to construction that will identify those trees that will remain on site after construction, and will include specifications for tree protection including fencing and instructions for contractors. This item may be coordinated with the Arlington County Urban Forester as well.

Comment 5.6.g. Ms. Irons, DEQ: *Consider development of an Environmental Management System.*

Response. DoD and AFMF are working with the Arlington National Cemetery (ANC) as the future steward of the project area. ANC periodically reviews the management of its property and may consider adopting an EMS for the entire Cemetery site. DoD is developing an EMS for the Pentagon Reservation.

Comment 5.6.h. Ms. Irons, DEQ: *Use the least toxic herbicides or pesticides effective for landscape maintenance. Products containing volatile organic compounds as their active ingredients should be avoided in order to protect air quality.*

Response. Comment noted. The landscape plan for the site proposes the use of native species to reduce maintenance requirements for the proposed landscape.

Comment 5.6.i. Ms. Irons, DEQ: *Any soil that is suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable Federal, state, and local laws and regulations. These include, but are not limited to Virginia Waste Management Act, Virginia Hazardous Waste Management Regulations, Virginia Solid Waste Management Regulations, and Resource Conservation and Recovery Act.*

Upon classification as friable or non-friable, all waste asbestos-containing materials must be disposed of in accordance with the Virginia Solid Waste Management Regulations, and transported with the Virginia regulations governing Transportation of Hazardous materials.

The proposed project must comply with OSHA regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations.

Response. Material excavated from the site will be tested and disposed of according to applicable regulations. Asbestos or lead-bearing wastes will be collected, transported and disposed by a specially licensed contractor, in accordance with the requirements of Title 40 CFR Part 763 or other applicable federal regulations. In addition, DoD and the AFMF are currently reviewing OSHA and applicable hazardous materials regulations to formulate an effective control and removal plan that will be used during the construction of the Memorial.

Comment 5.6.j. Ms. Irons, DEQ: *Pursuant to the Coastal Zone Management Act of 1972, as amended, the Department of Defense is required to determine the consistency of its activities affecting Virginia's coastal resources or coastal uses with the Virginia Coastal Resources Management Program (VCP). This involves an analysis of the activities in light of the Enforceable Programs of the VCP, and submission of a consistency determination reflecting that analysis and committing the Department of Defense to comply with the Enforceable Programs.*

Response:

Federal Consistency Determination - DoD has determined that the proposed project would not have any direct effects on the coastal zone or coastal zone resources and uses. As discussed under Section 4.4.3 Water Resources of the EA, there are no surface water bodies,

floodplains, or wetlands located within the immediate vicinity of the project site. The potential for indirect effects would be minimal, and are summarized below for each of the enforceable regulatory programs of Virginia's Coastal Resources Management Program:

- *Fisheries Management* – The proposed project would not result in any direct or indirect effects to Fisheries Management.
- *Subaqueous Lands Management* – The proposed project would not result in any direct or indirect effects to Subaqueous Lands Management.
- *Wetlands Management* – The proposed project would not result in any direct or indirect effects to Wetlands Management.
- *Dunes Management* – The proposed project would not result in any direct or indirect effects to Dunes Management.
- *Non-Point Source Pollution Control* – An approved erosion and sediment control plan would be in place before any ground disturbing activities are begun.
- *Point Source Pollution Control* – There would not be a point source on the property that would be regulated.
- *Shoreline Sanitation* – The proposed project would not result in any direct or indirect effects to Shoreline Sanitation.
- *Air Pollution Control* – As discussed under Section 4.4.1 Air Quality, best management practices would be employed as part of a demolition/construction management plan to minimize temporary demolition and construction impacts.
- *Coastal Lands Management* – The proposed project site does not fall within the Resource Protection Area (RPA) under Arlington County's *Chesapeake Bay Preservation Ordinance*. However, all areas in the County that are not identified as RPAs are categorized as Resource Management Areas (RMAs). Therefore, General Performance Standards, as identified in the Ordinance, would be considered during the development of the site.

Comment 5.6.k. Mr. Jones, DCR: *A search of the Dept of Conservation and Recreation's Biological and Conservation Data System (BCD) indicates the presence of natural heritage resources in the project vicinity. However, due to the scope of activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.*

Response: The project proponents agree with this comment.