Name	Organization	Should any other Consulting Parties be invited to join the process?	Should the APE be modified, and if so, what is your suggestion on the change in boundaries?	Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?
Derek Manning	Fort Belvoir DPW - ENRD	* Pohick Episcopal Church	* The APE should be defined as the combination of visual, auditory, direct impact, and cumulative impact APEs.  * Fort Belvoir recommends a visual APE of 1/4 mile from existing edge of pavement and an auditory APE of 1/2 mile from existing edge of pavement.  * Based on a review of the Fairfax County Comprehensive Plan, Fort Belvoir recommends that the direct impact APE should be expanded at the intersections of Telegraph Road and Route 1 and Route 7100 and Route 1 in order to account for possible grade-separated interchanges at those two locations. The direct impact APE at Telegraph Road should be expanded to 300 feet from edge of pavement (off both Telegraph Road and Route 1). The direct impact APE at 7100 should be expanded to 600 feet from edge of pavement (off both 7100 and Route 1).  * Fort Belvoir does not have a recommendation for the cumulative effects APE at this time, but feels that this should coincide with the cumulative effects study area for the NEPA analysis.	has been recommended for further study. Fort Belvoir received documentation from FHWA that indicates that site 44FX1680 has been determined ineligible for National Register-listing.
Helen Ross	VDOT Environmental		* The project would benefit from a broad application of the definition rather than being more narrow as well-defined APEs will help the project in the long run.	* Any and all pipes, culverts, or bridges approaching the age of fifty years that may be affected by the proposed widening. VDOT would provide, where applicable, inventory numbers and/or the construction dates as reflected in the HTRIS database. For example, looking at the ADC map, Ms. Ross counts at least seven crossings between the project termini, and she suspects that some structures will be lengthened as opposed to being replaced outright.
Earl Flanagan	Commissioner	* Frank Cohn, Mount Vernon Transportation Commissioner * Catherine Voorhees, Chairman of the Mount Vernon Council Transportation Committee	* Village of Accotink within which historic and archeological sites may be at risk.	
Ross Bradford	National Trust for Historic Preservation	* Advisory Council on Historic Preservation * Gum Springs Historical Society * Pohick Episcopal Church * Fairfax County History Commission * Accotink Methodist Church * Mount Vernon * Additional consulting parties suggested by other consulting parties	* A map showing the proposed boundaries for the various APEs should be created to show where the APEs are in relation to various resources.  * Current APE is too limited and does not take into account all direct, indirect, and cumulative impacts. FHWA should expand the APE for this project.  * At the very minimum, the entire Woodlawn property owned by the National Trust must be included within the APE. This project has the potential to have dramatically harmful direct, visual, cumulative, and economic impacts on Woodlawn as a whole.  * With respect to cumulative impacts on Woodlawn, the FHWA must consider the impacts of this project together with the impacts of the Old Mill Road widening project (Mulligan Road), the increased traffic associated with the realignment of Fort Belvoir, and the recent construction of the Lewis Heights housing project immediately to the northwest of the Woodlawn property.  * The FHWA should specifically consider auditory and visual impacts.  * The APE should include all areas directly impacted from any ground disturbance by this project such as, but not limited to, the use of temporary or permanent drainage and construction easements and utility relocation activities.	* Strongly disagree with FHWA's initial determination that the Pope-Leighey House falls outside the APE as stated in the handouts prepared for the June 16, 2011 meeting. Because of the potential impacts of this project, Mr. Bradford recommends that all cultural resources located on the Woodlawn property be considered. Particular concern was noted regarding the direct impact to Grand View House, which has been depicted as being within the right-of-way for at least one proposed alignment option. * Recommend that the FHWA evaluate the Village of Accotink as suggested by other consulting parties during the meeting on June 16, 2011. * The George Washington Grist Mill should also be considered since it will likely experience indirect impacts from this project at the intersection of Route 1 and Mount Vernon Highway.

Name	Organization	Should any other Consulting Parties be invited to join the process?	Should the APE be modified, and if so, what is your suggestion on the change in boundaries?	Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?
Linda Cornish Blank	Egirfay County Dont of	by FHWA)  * Sallie Lyons (as individual or Fairfax County History Commission representative)  * Fairfax County History Commission	* A mileage range as suggested by Derek Manning is also an alternative provided that any resources that are visible from and to the proposed roadway right-of-way limits are included.  * With respect to the visibility of resources, has a viewshed study been completed?	* Village of Accotink. As stated at the June 16, 2011 meeting regarding Accotink Village, the Fairfax County Comprehensive Plan directed that the area should be studied and findings have since confirmed that it does not meet Historic Overlay District criteria. The survey recommends more research and documentation prior to development especially for two properties. More research is recommended to verify construction dates of buildings. Further archaeological studies should be undertaken. Determination of National Register eligibility is needed for properties within the survey area. The survey document has been forwarded to FHWA for its use.
Michele Aubry/Fairfax County Architectural Review Board	Fairfax County Architectural Review Board	* Fairfax County History Commission * Pohick Episcopal Church * Mount Vernon Ladies Association	District.  * The APE needs to be large enough to consider the possibility of not only physical destruction or damage to resources in the historic overlay districts but also visual, atmospheric, and audible impacts to resources and impacts to crucial features of each historic overlay district's topography and vegetation. The APE should be expanded to consider possible impacts to the character of each property's use or setting.  * The baseline for measuring the APE should be from the edge of the proposed roadway right-	the Woodlawn Friends Meeting House, Woodlawn Baptist Church, and Pohick Episcopal Church, none of which were identified in materials at the meeting of Consulting Parties.  * The topography and vegetation are crucial features of the Woodlawn Historic
Judy Riggin	Woodlawn Quaker Meetinghouse		* APEs should be expanded to include the Village of Accotink.	* The Gray's Hill area associated with the Thomas Wright farm (and other later landholders) should be evaluated, building on the Belvoir Phase II study done of that area for consideration of the NMUSA site.  * Woodlawn Community House, as being researched by Martha Catlin, Friends Meeting historian, should be identified and evaluated. It has significance to the early twentieth-century Woodlawn community, including Camp Humphreys.  * Individual historic properties in Accotink.

Name	Organization	Should any other Consulting Parties be invited to join the process?	Should the APE be modified, and if so, what is your suggestion on the change in boundaries?	Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?
Martha ( 'laira ( 'atlin - I	Woodlawn Quaker Meetinghouse	* Gum Springs Historical Society * Pohick Church * Accotink Methodist Church * Representatives concerned for the preservation of the historic Village of Accotink * Martha Claire Catlin, Historian, Alexandria Monthly Meeting of the Religious Society of Friends. Ms. Catlin requests a response to her written request to participate as a Consulting Party. * All individuals whose comments in the scoping process pertained to the project's potential effects to historic properties * Descendants of individuals buried in the Woodlawn Baptist Church Cemetery * The Advisory Council on Historic Preservation, pursuant to 36 CFR 800.6(a)(1)(i) * The Secretary of the Interior, pursuant to 36 CFR 800.10(c) * The Superintendent of the George Washington Memorial Parkway	* Village of Accotink and areas along Backlick Road within the APE.  * Include borrow areas, construction staging areas, and all lands and environments associated with other construction-related activities.  * Ongoing consideration of any needed changes to the APE should be pursued in consultation with Fort Belvoir.  * Any proposed action that would result in limiting alternatives that could avoid, minimize, or mitigate adverse effects on historic properties in areas along Route 1 located north of the project would require expansion of the APE to those areas.  * Any proposed action that would result in effects to historic properties, such as George Washington's Grist Mill, or the George Washington Memorial Parkway, properties listed on the National Register of Historic Places, would require expansion of the APE to the potentially affected areas.	* Woodlawn Community House, a building erected in 1922 on a one-acre lot adjoining the entrance to Camp A.A. Humphreys, should be identified, evaluated, and protected. The site is located adjacent to Belvoir Road on the north side of the road, and is likely within or near the currently proposed boundaries of the APE.  * The full extent of the Woodlawn Plantation historic property that is listed on the National Register of Historic Places, including its component historic properties such as Grand View and the Otis Mason house, should be identified as historic properties in Section 106 documentation.  * The "Archeological Properties" section of the meeting handout cannot be comment upon without additional information. Please provide maps, site reports, and results of documentary research that would identify historic land ownership for each of the six archaeological sites identified as "recommended for further study."

Name	Organization	Are there any other issues that should be addressed in this NEPA document?	General Comments	Comments on Coordination Meeting Minutes
Derek Manning	Fort Belvoir DPW - ENRD			
Helen Ross	VDOT Environmental			
Earl Flanagan	Mount Vernon Planning Commissioner	* Appropriateness of transportation alternatives upon the time period of historic sites.		
Ross Bradford	National Trust for Historic Preservation	resources impacted by this project. Explore new and creative ways of minimizing harm to these resources through the use of innovative urban road design and the use of new materials.  * Consider Mulligan Road's potential traffic impact on Route 1. Consider alternatives that explore using different transportation corridors other than Route 1 for this project.  * Take into consideration any anticipated impacts from this project related to any and all: short and long-term increases in noise and sound pollution; short and long-term increases in light intrusion; permanent loss of mature vegetation that protects historic resources from visual impacts and noise	harm to the National Historic Landmark "to the maximum extent possible." 16 U.S.C. § 470h-2(f). Finally, the Section 106 regulations	

Name	Organization	Are there any other issues that should be addressed in this NEPA document?	General Comments	Comments on Coordination Meeting Minutes
Linda Cornish Blank	Fairfax County Dept of Zoning	* The Camp Humphreys Pump Station and Filter Building, a National Register-eligible property that houses the Eleanor U. Kennedy Center Shelter for the Homeless, is located with the project area and identified as a historic property with the APE. Consideration of how the Route 1 improvements will affect the residents, services to the residents, and building infrastructure, access and use must be balanced with the effect on this historic property.  * Context Sensitive Design.	a Route 1 Transit Study. Please consider providing to consulting parties pertinent pages from the Comprehensive Plan in hard copy or electronically; information (overview, purpose, framework et al) on the Transit Study; and other pertinent studies or plans that you are aware of which may be anticipated to effect the consultation and be raised in consultation discussion. Consider asking FDOT staff to address the interfacing of the transportation plan to our consultation: What elements went into the transportation plan maps in the county's Comp Plan? For example, were effects on environmental and heritage resources of road widening shown in the plan taken into account?	* Study History/Purpose and Need: Is this the Purpose and Need for the EA?  * Comment on Purpose and Need Draft (provided as a meeting handout):  1.1 Study Area, last sentence. Should this also include cultural along with human and environmental as cited?  1.2 History, first sentence. Include that location is in Fairfax County, Virginia. Third paragraph, first sentence. The intersection is at Rt. 1, Telegraph and Old Colchester Roads. Second sentence: State that this is (or will be) Mulligan Road.  * Page 5 of the Meeting summary: Cultural Resources Identification Efforts  "Regarding Accotink Village, Linda Blank (Blank), Fairfax County Planning and Zoning, summarized that the Comprehensive Plan directed that the site should be studied and findings have since confirmed that it does not meet Historic District Overlay criteria. The study will be forwarded to FHWA for their use.  Minnix added that a developer is considering redevelopment and plans are currently undergoing the zoning process an amendment to the County Comprehensive Plan.
Michele Aubry/Fairfax County Architectural Review Board	Fairfax County Architectural Review Board		all the architectural properties listed in another handout. The figure also fails to identify all the cemeteries associated with some of the historic properties within the APE. Two figures relate to the Route 1-Mulligan Road project as opposed to the Route 1-Fort Belvoir project. Both of those figures are out-dated in that they show a new	* Pg. 1: The affiliation for Elizabeth Crowell is incorrect; she is with the Fairfax County Park Authority.  * Pg. 4: The last bulleted paragraph on this page attributes a statement to me whereas, in fact, it was Elizabeth Crowell of the Fairfax County Park Authority who made the remark.  * Pg. 6: The second bulleted paragraph on this page notes that Jack Van Dop said there is a page for the project on the FHWA web site. As I recall, Mr. Van Dop also said the URL web address for the project page would be included in the meeting minutes.
Judy Riggin	Woodlawn Quaker Meetinghouse	* Effects of road improvements on the homeless who live, walk, and take buses along Route 1. Safe crosswalks, sidewalks and/or trails for pedestrian traffic are important, as are safe and strategically located bus stops.  * Examine how Route 1 can be changed to be a transportation venue for the future, including safe and inviting pedestrian and bike paths, varied types of public transit, and landscaping to reclaim and keep a mix of open space and woods for rural flavor near historic sites.  * Noise: Silent worship is at the heart of the Quaker practice and is a part of the historic significance of the National Register-listed property. Noise from Route 1 should be controlled – by design, road surface, landscaping.  * Possible relocation of Woodlawn Baptist Church Cemetery: If the cemetery is to be relocated, the new site should be on land adjacent to the current Baptist Church property to retain its significance to the Woodlawn Historic District and to all the properties who share its historic heritage. Friends request that the Army and FHWA determine how to provide Woodlawn Baptist Church such adjacent property for the cemetery in exchange for its land lost to Route 1 widening, as well as the necessary new road access at the traffic light at Woodlawn Road.		* If Figure 1 - Project Location Map (in Purpose and Need) is intended for future use, please correct the placement of the icons ("Cem" with red square) to identify the AMM Quaker cemetery and the Woodlawn Baptist cemetery. The Quaker cemetery is located behind the meetinghouse, not to its north, as shown on the map. The Baptist cemetery is across the Route 1 side of its property, not on the other side of Route 1, as shown on the map. Ideally, an accurate new map showing the WHOD and all cultural resources will be created for use in the Section 106 consultation.

Name	Organization	Are there any other issues that should be addressed in this NEPA document?	General Comments	Comments on Coordination Meeting Minutes
Martha (Taire Catlin T	Woodlawn Quaker Meetinghouse	* Noise impacts  * Pedestrian safety and environmental justice  * Traffic calming  * Design excellence  * Compatibility of design with historic properties and the Woodlawn Historic District  * Accommodation of pedestrians and the users of the Potomac Heritage Trail  * Compatibility of landscape treatments  * Strategies to reduce future traffic volumes by providing alternative access points to Fort Belvoir and alternative routes for through traffic that would allow vehicles to bypass Fort Belvoir and the Woodlawn Historic District.  * Strategies to allow public transportation to be placed outside the right-of-way, or underground, and thereby reduce the extent of widening needed.  * Potential impacts on the human or natural environment for the portion of Route 1 north of the project area.  * Potential impacts on the human or natural environment in areas along Mount Vernon Memorial Highway and the George Washington Memorial Highway.		

From: Manning, Derek USA CIV (US)

To: Ashton, Surbhi; Jack.vandop@dot.gov; Tyler, Stuart; Kicos, Marcia G USA CIV (US); Brundage, Marcus K USA

<u>CIV (US)</u>; <u>Christopher.landgraf.civ@mail.mil</u>; <u>Jrc@simmsshowerslaw.com</u>; <u>Robert.iosco@vdot.virginia.gov</u>; <u>earlflanagan@verizon.net</u>; <u>susan\_hellman@nthp.org</u>; <u>don\_briggs@nps.gov</u>; <u>ross\_bradford@nthp.org</u>; <u>ryan.kimberley@dot.gov</u>; <u>Thomas.shifflett@dot.gov</u>; <u>Linda.blank@fairfaxcounty.gov</u>; <u>mcaubry@aol.com</u>; <u>Helen.ross@vdot.virginia.gov</u>; <u>Douglas.miller@vdot.virginia.gov</u>; <u>rigginjm@verizon.net</u>; <u>mccatlin@earthlink.net</u>;

<u>Julie marburger@nthp.org</u>; <u>Deborah newburg@nthp.org</u>; <u>Caitlin eichner@nthp.org</u>;

Smitha.chellappa@fairfaxcounty.gov; Wesley.minnix@fairfaxcounty.gov; Laura.miller@fairfaxcounty.gov; Jane.rosenbaum@fairfaxcounty.gov; Elizabeth.crowell@fairfaxcounty.gov; Khalid.salahuddin@fairfaxcounty.gov;

Laurie ossman@nthp.org

Subject: RE: Rt 1 Belvoir 106 Meeting Summary Date: Friday, June 24, 2011 10:56:01 AM

Attachments: image003.jpg

In response to FHWA request for comments on the list of consulting parties, Area of Potential Effect (APE) and historic resource identification efforts Route 1 Improvements Project, Fort Belvoir recommends the following changes:

Pohick Episcopal Church should be invited to participate in the Section 106 consultation.

The APE should be defined as the combination of a visual, auditory, direct impact and cummulative impact APEs. Fort Belvoir recommeds a visual APE of 1/4 mile from existing edge of pavement and an auditory APE of 1/2 mile from existing edge of pavement. Based on a review of the Fairfax County comprehesive plan Fort Belvoir recommends that the direct impact APE should be expanded at the intersections of Telegraph Road and Route 1 and Route 7100 and Route 1 in order to account for possible seperated interchanges at those two locations. The direct impact APE at Telegraph Road should be expanded to 300 feet from edge of pavement (off both Telegraph Road and Route 1). The direct impact APE at 7100 should be expanded to 600 feet from edge of pavement (off both 7100 and Route 1). Fort Belvoir does not have a recommendation for the cumulative effects APE at this time, but feels that this should conencide with the cummulative effects study area for the NEPA analysis.

The proposed APE expansion as note above will add one additional historic resource, archeological site 44FX1810 to the APE. Fort Belvoir's records indicate that this site has been recommeded for further study. Fort Belvoir recieved documentation from FHWA which indicates that site 44FX1680 has been determined ineligible for National Register-listing.

Derek Manning Cultural Resources Manager US Army Garrison Fort Belvoir 703-806-3759

From: Ashton, Surbhi [Surbhi.Ashton@parsons.com]

Sent: Monday, June 20, 2011 4:23 PM

To: Jack.vandop@dot.gov; Tyler, Stuart; Ashton, Surbhi; Manning, Derek USA CIV (US); Kicos, Marcia G

USA CIV (US); Brundage, Marcus K USA CIV (US); Christopher.landgraf.civ@mail.mil; Jrc@simmsshowerslaw.com; Robert.iosco@vdot.virginia.gov; earlflanagan@verizon.net;

susan\_hellman@nthp.org; don\_briggs@nps.gov; ross\_bradford@nthp.org; ryan.kimberley@dot.gov;

Thomas.shifflett@dot.gov; Linda.blank@fairfaxcounty.gov; mcaubry@aol.com;

Helen.ross@vdot.virginia.gov; Douglas.miller@vdot.virginia.gov; rigginjm@verizon.net;

mccatlin@earthlink.net; Julie\_marburger@nthp.org; Deborah\_newburg@nthp.org;

 $Cait lin\_eichner@nthp.org; Smitha.chellappa@fairfaxcounty.gov; Wesley.minnix@fairfaxcounty.gov; W$ 

Laura.miller@fairfaxcounty.gov; Jane.rosenbaum@fairfaxcounty.gov;

Elizabeth.crowell@fairfaxcounty.gov; Khalid.salahuddin@fairfaxcounty.gov; Laurie\_ossman@nthp.org

Subject: Rt 1 Belvoir 106 Meeting Summary

Attached is a draft summary of the Route 1 Consulting Parties Meeting that was held on June 16, along with a copy of the sign-in sheets and handouts.

 From:
 \_Jack.VanDop@dot.gov

 To:
 \_Tyler, Stuart; Ashton, Surbhi

 Cc:
 \_Ryan.Kimberley@dot.gov

Subject: FW: Comments for Ft. Belvoir, Route 1 improvements.

**Date:** Wednesday, June 29, 2011 2:54:33 PM

#### FYI

From: Ross, Helen P. [mailto:Helen.Ross@VDOT.Virginia.gov]

**Sent:** Wednesday, June 29, 2011 1:45 PM

To: VanDop, Jack (FHWA)

**Cc:** Iosco, Robert C.; Miller, Douglas C.; Vaughan, Jan **Subject:** Comments for Ft. Belvoir, Route 1 improvements.

Good afternoon Jack:

We've looked over the items being requested for input from the consulting parties:

- APE definition
- Other resources to consider
- Other entities to invite for consulting party status; and
- Project purpose and need

The VDOT would like to offer comments for the first two items:

The project, in our opinion, would benefit from a broad application of the definition rather being more narrow. We realize that many of the resources have been captured in previous studies. Just like to offer up the benefits of well defined APEs and how they can help you in the long run.

Any and all pipes, culverts, or bridges approaching the age of fifty years that may be affected by the proposed widening. VDOT would provide, where applicable, inventory numbers and/or the construction dates as reflected in HTRIS database. For example looking at the ADC map I count at least seven crossings between the project termini. I suspect that some structures will be lengthened as opposed to outright replacement.

That's all from these parts,

Helen

#### Helen P. Ross

VDOT, District Preservation Manager

NoVA, Culpeper, and Fredericksburg Districts

o) 540 899 4033 f) 540 374 3385 c) 540 220 8920

Helen.Ross@VDOT.Virginia.gov

From: Ashton, Surbhi
To: Ashton, Surbhi

Subject: E. Flanagan 106 Responses

Date: Monday, June 27, 2011 7:13:27 AM

Surbhi P. Ashton, P.E.

#### **PARSONS**

From: Earl Flanagan [mailto:earlflanagan@verizon.net]

**Sent:** Friday, June 24, 2011 5:18 PM

**To:** Jack.vandop@dot.gov

**Cc:** Ashton, Surbhi; Tyler, Stuart; Derek.manning.civ@mail.mil; Marcia.g.kicos.civ@mail.mil; Marcus.k.brundage.civ@mail.mil; Christopher.landgraf.civ@mail.mil; Jrc@simmsshowerslaw.com;

Robert.iosco@vdot.virginia.gov; susan\_hellman@nthp.org; don\_briggs@nps.gov;

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mcaubry@aol.com; Helen.ross@vdot.virginia.gov; Douglas.miller@vdot.virginia.gov;

rigginjm@verizon.net; mccatlin@earthlink.net; Julie\_marburger@nthp.org; Deborah\_newburg@nthp.org; Caitlin\_eichner@nthp.org; Smitha.chellappa@fairfaxcounty.gov; Wesley.minnix@fairfaxcounty.gov;

Laura.miller@fairfaxcounty.gov; Jane.rosenbaum@fairfaxcounty.gov; Elizabeth A Crowell;

Khalid.salahuddin@fairfaxcounty.gov; Laurie\_ossman@nthp.org

Subject: Re: Rt 1 Belvoir 106 Meeting Summary

In response to the Subject held on June 16, 2011 in which you asked the group:

o Should any other Consulting Parties be invited to join the

#### process?

- Should the APE be modified, and if so, what is your suggestion on the change in boundaries?
- Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?
- o Are there any other issues that should be addressed in this NEPA document? I recommend Frank Cohn, the Mount Vernon Transportation Commissioner and Catherine Voorhees, the Chairman of the Mount Vernon Council Transportation Committee be invited to participate in the Section 106 consultation.

I also wish to confirm my previous request that the APE be modified to include the Village of Accotink within which historic and archeological sites may be at risk.

I don't have any other cultural resources to suggest at this time

An issue that should be addressed in the NEPA document is the appropriateness of transportation alternatives upon the time period of historic sites.

Earl Flanagan, Planning Commissioner Mount Vernon District, Fairfax County

On Jun 20, 2011, at 4:23 PM, Ashton, Surbhi wrote:

June 30, 2011

SENT VIA EMAIL TO JACK.VANDOP@DOT.GOV

Mr. Jack Van Dop Federal Highway Administration Eastern Federal Lands Highway Division 21400 Ridgetop Circle Sterling, VA 20166

RE: June 16, 2011 - US Route 1 Improvements at Fort Belvoir

Section 106 Consulting Parties Meeting

Dear Mr. Van Dop:

The National Trust for Historic Preservation would like to provide the Federal Highway Administration (FHWA) with our comments on the US Route 1 Improvements at Fort Belvoir.

At the outset we would like to object to the short timeframe in which we have been asked to respond to your request. As you know, the first consulting parties meeting was held on June 16, 2011. At that meeting a number of outdated exhibits were used, and new documents, such as the draft of the purpose and need statement, were distributed on the spot without being provided in advance. On June 20, 2011 your consultants sent an email containing a draft of the minutes from that meeting and a request that responses be submitted by June 30, 2011. We feel that the timeframe provided for responses was not adequate to fully address the issues you raised. In the future, we request that you provide 30 days for responses. Nonetheless, we are providing some of our responses to you at this time and will provide the remainder of our comments regarding the June 16, 2011 meeting by July 8, 2011.

We would also like to remind the FHWA of the applicable legal standards related to this project. As you know, a portion of this project cuts through the heart of the Woodlawn Historic District, and along the edge of the Woodlawn National Historic Landmark. As a result, the project will require the "use" of historic properties, and therefore, FHWA must include "all possible planning to minimize harm" to those properties under Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303. In addition, Section 110(f) of the National Historic Preservation Act imposes the duty to minimize harm to the National Historic Landmark "to the maximum extent possible." 16 U.S.C. § 470h-2(f). Finally, the Section 106 regulations require the agencies to "develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties." 36 C.F.R. § 800.6(a).

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Law DEPARTMENT NTHP Comments US Route 1 Improvements at Fort Belvoir June 30, 2011 Page 2 of 4

At the June 16, 2011 meeting you requested feedback from consulting parties regarding the following four questions:

- 1. Should any other consulting parties be invited to join the process?
- 2. Should the Area of Potential Effects (APE) be modified, and if so, what is your suggestion on the change in boundaries?
- 3. Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?
- 4. Are there any other issues that should be addressed in this National Environmental Policy Act (NEPA) document?

Our responses to these questions follow:

#### Should any other Consulting Parties be invited to join the process?

Yes, the National Trust suggests that the following additional consulting parties be invited to join, in addition to those that are already included on your list: Advisory Council on Historic Preservation, Gum Springs Historical Society, Pohick Episcopal Church, Fairfax County History Commission, Accotink Methodist Church, and Mount Vernon. Additional consulting parties have been suggested by other consulting parties, and the FHWA should also consider inviting these parties to join the process.

# Should the APE be modified, and if so, what is your suggestion on the change in boundaries?

Yes. First of all, a map showing the proposed boundaries for the various APEs should be created so that the consulting parties can clearly understand where the APEs are in relation to various resources.

Even before the map is made available, however, it is clear that the current APE is too limited and does not take into account all direct, indirect, and cumulative impacts. As such, FHWA should expand the APE for this project. At the very minimum, the entire Woodlawn property owned by the National Trust must be included within the APE. As you know, our property contains a National Historic Landmark, including associated contributing structures, as well as several other historic resources, such as the Frank Lloyd Wright-designed Pope-Leighey House and Grand View House. This project has the potential to have dramatically harmful direct, visual, cumulative, and economic impacts on Woodlawn as a whole. The National Trust is particularly concerned about these adverse effects since our property is operated as a historic site that is open to the public. As a result, the severe damage from this project will not only harm Woodlawn directly, but will also harm our ability to maintain this historic property as an economically viable historic site. For example, the property will be less desirable as a rental destination for special

NTHP Comments US Route 1 Improvements at Fort Belvoir June 30, 2011 Page 3 of 4

events, and long-term leased uses, such as the stables or other agricultural uses, may become impossible.

With respect to cumulative impacts on Woodlawn, the FHWA must consider the impacts of this project together with the impacts of the Old Mill Road widening project (Mulligan Road), the increased traffic associated with the realignment of Fort Belvoir, and the recent construction of the Lewis Heights housing project immediately to the northwest of the Woodlawn property. It is no exaggeration to say that Woodlawn is under assault literally on all sides.

The FHWA should also specifically consider auditory and visual impacts. In addition, the APE should include all areas directly impacted from any ground disturbance by this project such as, but not limited to, the use of temporary or permanent drainage and construction easements and utility relocation activities.

# Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?

Yes. We strongly disagree with FHWA's initial determination that the Pope-Leighey House falls outside the APE as stated in the handouts prepared for the June 16, 2011 meeting. Because of the potential impacts of this project, we recommend that all cultural resources located on our property be considered. We are particularly concerned with the direct impact to Grand View House which has been depicted as being within the right of way for at least one proposed alignment option. We also recommend that the FHWA evaluate the Village of Accotink as suggested by other consulting parties during the meeting on June 16, 2011. The George Washington Grist Mill should also be considered since it will likely experience indirect impacts from this project at the intersection of Route 1 and Mount Vernon Highway.

#### Are there any other issues that should be addressed in this NEPA document?

The NEPA document must address why the 2007 EIS for the Fort Belvoir BRAC assured the public that it would not be necessary to widen this section of Route 1 in order to accommodate increased traffic associated with the realignment. Now that the realignment is nearly complete, the public is now being told that widening Route 1 is absolutely essential in response to the BRAC realignment. This glaring inconsistency raises troubling questions about what other errors or misrepresentations may have been included in the 2007 BRAC EIS. The National Trust would like to receive copies of the traffic studies that quantifiably demonstrate that only new civilian commercial development warrants this drastic increase in US Route 1's traffic load. We would like to know which studies are being used to justify the need for this project and also receive copies of those studies. We would also like to receive copies of the traffic studies relating to the realignment's impact on Route 1.

NTHP Comments US Route 1 Improvements at Fort Belvoir June 30, 2011 Page 4 of 4

The FHWA should also assess the overall economic effects this project will have on the set of historic resources impacted by this project. This project has the potential to jeopardize the financial viability of these resources. As such, the FHWA should embark on a comprehensive analysis of this project and explore new and creative ways of minimizing harm to these resources through the use of innovative urban road design and the use of new materials.

As the FHWA knows, Mulligan Road is currently under construction, and it is not clear yet what impact this new transportation corridor will have on Route 1. As such, the FHWA should consider Mulligan Road's potential traffic impact on Route 1. The FHWA should also consider alternatives that explore using different transportation corridors other than Route 1 for this project.

The National Trust also recommends that the FHWA take into consideration any anticipated impacts from this project related to any and all: short and long term increases in noise and sound pollution; short and long term increases in light intrusion; permanent loss of mature vegetation that protects historic resources from visual impacts and noise and light infiltration and that aids in soil erosion prevention; water quality and storm water management effects; and impacts from increased automotive traffic and automotive exhaust, which may cause diminished air quality on the Woodlawn property. The FHWA should also consider the permanent and irrevocable destruction of character of Woodlawn's historic viewshed with its significant visual connection of the main house to its parent property, Mount Vernon.

We reserve the right to modify or revise these comments at any time. If you have any questions regarding this letter, please feel free to contact me via email at ross\_bradford@nthp.org or via telephone at 202-588-6252.

Sincerely,

Ross M. Bradford

From M. Bradford

Associate General Counsel

cc: Mary Ann Naber, Federal Preservation Officer, FHWA

Carol Legard, ACHP

Charlene Vaughn, ACHP

Reid Nelson, ACHP

Kathleen Kilpatrick, VA-SHPO

Marc Holma, VA-DHR

Linda Blank, Fairfax County

Judy Riggin, Alexandria Monthly Meeting of the Religious Society of Friends

Justin Coleman, Woodlawn Baptist Church

Jim Reese, Mount Vernon Estate and Gardens

# DRAFT SUMMARY, CONSULTING PARTIES MEETING US ROUTE 1 IMPROVEMENTS AT FORT BELVOIR

## Response from Fairfax County Dept. of Planning & Zoning to request below:

- The group was asked to provide feedback to Jack Van Dop at FHWA (see below for contact information) by June 30, 2011 on the following items or any other related matter:
  - o Should any other Consulting Parties be invited to join the process? Yes.

Pohick Episcopal Church (already identified by FHWA)
Sallie Lyons (as individual or Fairfax County History Commission representative; contact information previously supplied to Jack Van Dop)
Fairfax County History Commission
Accotink Methodist Church

o Should the APE be modified, and if so, what is your suggestion on the change in boundaries? Yes.

The APE for architectural resources is proposed to be 200 feet on either side of roadway and any other resources that are visible from the roadway, as per the previous study. This appears to be too narrowly defined. Suggest this be clarified to 200 feet on either side of the proposed roadway right-of-way limits and any resources that are visible from and to that defined area. This would need to take into account any possible grade separated intersections. A mileage range as suggested by Derek Manning is also an alternative provided that any resources that are visible from and to the proposed roadway right-of-way limits are included.

In respect to the visibility of resources, has a viewshed study been completed?

• Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking? Yes.

Village of Accotink. As stated at the June 16, 2011 meeting regarding Accotink Village, the Fairfax County Comprehensive Plan directed that the area should be studied and findings have since confirmed that it does not meet Historic Overlay District criteria. The survey recommends more research and documentation prior to development especially for two properties. More research is recommended to verify construction dates of buildings. Further archaeological studies should be undertaken. Determination of National Register eligibility is needed for properties within the survey area. The survey document has been forwarded to FHWA for its use.

o Are there any other issues that should be addressed in this NEPA document? Yes.

Judy Riggin, on behalf of the Alexandria Meeting, raised the concern of how the improvements to Route 1 would affect the homeless population in the area. The Camp Humphreys Pump Station and Filter Building, a National Register-eligible property, and housing the Eleanor U.

Kennedy Center Shelter for the Homeless is located with the project area and identified as a historic property with the APE. Consideration of how the Route 1 improvements will affect the residents, services to the residents, and building infrastructure, access and use must be balanced with the effect on this historic property.

Context Sensitive Design.

# General comments/questions from Fairfax County Dept. of Planning & Zoning in follow up to June 16, 2011 meeting:

- 1. Distribution and use of hand-outs and electronic materials. Please ensure that materials provided to consulting parties reflect current information and plans. (Example Milligan Road project materials distributed at the June 16, 2011 meeting were outdated providing inaccurate information to consulting parties.)
- 2. Availability of information on plans and studies for connectivity. Discussion ensued, and repeated references were made, at the June 30, 2011to the Fairfax County Comprehensive Plan and to a Route 1 Transit Study. Please consider providing to consulting parties pertinent pages from the Comprehensive Plan in hard copy or electronically, information (overview, purpose, framework et al) on the Transit Study and other pertinent studies or plans that you are aware of which may be anticipated to effect the consultation and be raised in consultation discussion. Consider asking FDOT staff to address the interfacing of the transportation plan to our consultation: What elements went into the transportation plan maps in the county's Comp Plan? For example, were effects on environmental and heritage resources of road widening shown in the plan taken into account?
- 3. What affect does designation by the state of "Historic Route 1" have? How is the designation relevant for discussion in the consultation? Has the history of the road itself been acknowledged and taken into account?

## **Comment, question, edit on Draft Summary, Consulting Parties Meeting:**

1. Page 2 of the Meeting summary:

### Study History/Purpose and Need

• Given that the previous EA covered a larger area, the Purpose and Need (provided as a meeting handout) for this project was written with more focus; in particular, emphasis was placed on the impacts of the 2005 Defense Base Closure and Realignment Act (BRAC) and implications of the relocations on vehicular traffic in the Route 1 corridor. The Fort Belvoir Community Hospital along with the arrival and departure of various commands at the Fort is expected to result in additional vehicle trips on Route 1 in the study area.

Is this the *Purpose and Need* for the EA?

Comment on *Purpose and Need* Draft (provided as a meeting handout):

- 1.1 Study Area, last sentence. Should this also include cultural along with human and environmental as cited?
- 1.2 History, first sentence. Include that location is in Fairfax County, Virginia.

Third paragraph, first sentence. The intersection is at Rt. 1, Telegraph and Old Colchester Roads. Second sentence: State that this is (or will be) Mulligan Road.

#### 2. Page 5 of the Meeting summary:

### Cultural Resources Identification Efforts

Regarding Accotink Village, Linda Blank (Blank), Fairfax County Planning and Zoning, summarized that the Comprehensive Plan directed that the site should be studied and findings have since confirmed that it does not meet Historic District Overlay criteria. The study will be forwarded to FHWA for their use. Minnix added that a developer is considering redevelopment and plans are currently undergoing the zoning process an amendment to the County Comprehensive Plan.

From: <u>Mcaubry@aol.com</u>
To: <u>Ashton, Surbhi</u>

Cc: <u>Linda.Blank@fairfaxcounty.gov</u>; <u>elizabeth.crowell@fairfaxcounty.gov</u>; <u>Jack.VanDop@dot.gov</u>

Subject: Re: Rt 1 Belvoir 106 Meeting Summary
Date: Tuesday, June 28, 2011 7:34:13 AM

Attachments: <u>image003.jpg</u>

Dear Surbhi Ashton,

Thanks for sending out the draft summary of the consulting parties meeting on US Route 1 improvements at Fort Belvoir. Here are a few suggested revisions for you:

- Pg. 1: The affiliation for Elizabeth Crowell is incorrect; she is with the Fairfax County Park Authority.
- Pg. 4: The last bulleted paragraph on this page attributes a statement to me whereas, in fact, it was Elizabeth Crowell of the Fairfax County Park Authority who made the remark.
- Pg. 6: The second bulleted paragraph on this page notes that Jack Van Dop said there is a page for the project on the FHWA web site. As I recall, Mr. Van Dop also said the URL web address for the project page would be included in the meeting minutes.

That's it. Thanks again for the meeting summary.

Michele C Aubry
Fairfax County Architectural Review Board
Mcaubry@aol.com

In a message dated 6/20/2011 4:24:56 P.M. Eastern Daylight Time, Surbhi.Ashton@parsons.com writes:

Attached is a draft summary of the Route 1 Consulting Parties Meeting that was held on June 16, along with a copy of the sign-in sheets and handouts.

Please let me know if you have any suggested revisions to the summary.

Thank you.

Surbhi P. Ashton, P.E.

#### **PARSONS**

100 M Street, SE

**Suite 1200** 

Washington, DC 20003-3515

From: <u>Mcaubry@aol.com</u>

To: <u>Ashton, Surbhi; Tyler, Stuart</u>

Subject: Fwd: Rt 1 Section 106 Meeting Comments from Fx Cnty ARB

**Date:** Friday, July 15, 2011 11:28:35 AM

Attachments: Rt1-FortBelvoirSec106ARBCommentstoFHWA.pdf

fyi

From: Mcaubry@aol.com To: jack.vandop@dot.gov

CC: CRBierce@aol.com, JBoland@reesbroome.com, John\_A\_Burns@nps.gov, SusanN1179@aol.com, elisermurray@yahoo.com, jason.sutphin@fairfaxva.gov, joy@tmgarchitectsltd.com, jplumpe@studio39.com, pjuanpere@intecgroup.net,

rwmaia1@verizon.net, Linda.Blank@fairfaxcounty.gov Sent: 7/15/2011 11:21:01 A.M. Eastern Daylight Time

Subj: Rt 1 Section 106 Meeting Comments from Fx Cnty ARB

Dear Mr. Van Dop,

This follows-up my email of 30 June 2011 concerning submittal of a response from the Fairfax County Architectural Review Board (ARB) on the Route 1 Improvements at Fort Belvoir project. The ARB considered the matter at its public meeting held on 14 July 2011 and is providing you with the attached suggestions.

The ARB appreciates your understanding regarding its public meeting requirement, and thanks you for the opportunity to comment at this early stage of project planning.

Michele C Aubry Fairfax County ARB Mcaubry@aol.com

#### 15 July 2011

To: Jack Van Dop, Eastern Federal Lands Highway Division

Federal Highway Administration

From: Fairfax County Architectural Review Board

Subject: Route 1 Improvements at Fort Belvoir

From Telegraph Road to Mount Vernon Memorial Highway

Follow-up to Section 106 Consulting Parties Meeting on 16 June 2011

Thank you for including the Fairfax County Architectural Review Board (ARB) as a Section 106 Consulting Party on the subject highway project, which passes through the Woodlawn Historic Overlay District and the Pohick Church Historic Overlay District. Participants at the subject meeting were asked to provide feedback on the following items or any other related matter:

- Should any other Consulting Parties be invited to join the process?
- Should the Area of Potential Effect be modified and, if so, what is your suggestion on the change in boundaries?
- Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?
- Are there any other issues that should be addressed in this NEPA document?

The ARB considered these matters at its public meeting held on 14 July 2011, and is providing your office with the following suggestions:

#### Should any other Consulting Parties be invited to join the process?

The Fairfax County History Commission, Pohick Episcopal Church, and the Mount Vernon Ladies Association should be invited to join the process as Consulting Parties.

# Should the Area of Potential Effect be modified and, if so, what is your suggestion on the change in boundaries?

The Area of Potential Effect (APE) should be expanded to take into account all direct, indirect and cumulative impacts to historic, architectural, archaeological or culturally significant districts, sites, structures or objects within the Woodlawn Historic Overlay District and the Pohick Church Historic Overlay District. The APE needs to be large enough to consider the possibility of not only physical destruction or damage to resources in the historic overlay districts but also visual, atmospheric, and audible impacts to resources and impacts to crucial features of each historic overlay district's topography and vegetation. The APE should be expanded to consider possible impacts to the character of each property's use or setting.

The baseline for measuring the APE should be from the edge of the proposed roadway right-of-way limits and construction related areas.

We concur with the suggestion made by the National Trust for Historic Preservation that a "map showing the proposed boundaries for the various APEs should be created so that the consulting parties can clearly understand where the APEs are in relation to various resources."

# Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?

Each historic and contributing property within the Woodlawn Historic Overlay District and the Pohick Church Historic Overlay District should be considered for this undertaking. This includes the Pope-Leighey House, Grand View House, the Otis T. Mason House, George Washington's Grist Mill, and the cemeteries associated with the Woodlawn Friends Meeting House, Woodlawn Baptist Church, and Pohick Episcopal Church, none of which were identified in materials at the meeting of Consulting Parties. The topography and vegetation are crucial features of the Woodlawn Historic Overlay District, as is the wooded landscape of the Pohick Church Historic Overlay District. A segment of the Historic Route 1 roadbed runs through the Woodlawn Historic Overlay District. An archaeological survey should be conducted in the APE to locate, identify and evaluate significant sites that may be impacted by the undertaking.

#### Are there any other issues that should be addressed in this NEPA document?

Some of the exhibits distributed at the 16 June 2011 meeting are incomplete while others are out-dated. For example, a figure that shows the location of the Route 1-Fort Belvoir project fails to identify all the architectural properties listed in another handout. The figure also fails to identify all the cemeteries associated with some of the historic properties within the APE. Two figures relate to the Route 1-Mulligan Road project as opposed to the Route 1-Fort Belvoir project. Both of those figures are out-dated in that they show a new entrance to Woodlawn Plantation in a location that has changed per Section 106 consultations on the Route 1-Mulligan Road project. Exhibits and other materials provided to Consulting Parties need to be complete and up-to-date, reflecting current information and decisions by FHWA and Fort Belvoir on the numerous ongoing road and bridge projects within the study area.

On page 4 of the Draft Summary of the Consulting Parties Meeting, the fourth bullet under the heading <u>Cultural Resources Identification Efforts</u> incorrectly attributes a remark to ARB Member Michele Aubry. Please note that it was Dr. Elizabeth Crowell of the Fairfax County Park Authority who remarked that the project's cultural resources contractor, Coastal Carolina Research, should visit the Cultural Resource Management and Protection offices at the James Lee Community Center in Falls Church to review the County's records during their research.

Thank you for the opportunity to comment at this early stage of project planning.

From: <u>Judy Riggin</u>

To: <u>Jack.VanDop@dot.gov</u>

Cc: Ashton, Surbhi; Tyler, Stuart; Derek.manning.civ@mail.mil; Marcia.g.kicos.civ@mail.mil;

<u>Marcus.k.brundage.civ@mail.mil;</u> <u>Christopher.landgraf.civ@mail.mil;</u> <u>Jrc@simmsshowerslaw.com;</u>

Robert.iosco@vdot.virginia.gov; earlflanagan@verizon.net; susan\_hellman@nthp.org; don\_briggs@nps.gov; ross\_bradford@nthp.org; ryan.kimberley@dot.gov; Thomas.shifflett@dot.gov; Linda.blank@fairfaxcounty.gov; mcaubry@aol.com; Helen.ross@vdot.virginia.gov; Douglas.miller@vdot.virginia.gov; mccatlin@earthlink.net;

Julie marburger@nthp.org; Deborah newburg@nthp.org; Caitlin eichner@nthp.org;

Smitha.chellappa@fairfaxcounty.gov; Wesley.minnix@fairfaxcounty.gov; Laura.miller@fairfaxcounty.gov; Jane.rosenbaum@fairfaxcounty.gov; Elizabeth.crowell@fairfaxcounty.gov; Khalid.salahuddin@fairfaxcounty.gov;

Laurie ossman@nthp.org; "Daniel, Christopher CTR US USA"; christopher.daniel.civ@mail.mil

Subject: Friends" Comments RE Route One Section 106 initial consultation meeting

**Date:** Wednesday, June 29, 2011 8:04:32 AM

#### Jack and everyone:

The following comments for the Route One Improvements project are provided as requested by FHWA on behalf of Alexandria Monthly Meeting of the Religious Society of Friends (Friends):

### Other Consulting Parties to be invited:

The Advisory Council on Historic Preservation Accotink Methodist Church Gum Springs Historical Society

#### Determination of APE:

APEs should also be considered in terms other than distance from the edge of pavement. The variations of terrain and uses of the road may require expansion of the APEs to match physical circumstances.

APEs should be expanded to include the village of Accotink.

#### Other Cultural Resources to be considered:

The Gray's Hill area associated with the Thomas Wright farm (and other later landholders) should be evaluated, building on the Belvoir Phase II study done of that area for consideration of the NMUSA site.

Specifically, the site of Woodlawn Community House, as being researched by Martha Catlin, Friends Meeting historian, should be identified and evaluated. It has significance to the early twentieth-century Woodlawn community, including Camp Humphreys.

Individual historic properties in Accotink should be evaluated and considered.

#### Other NEPA issues:

Careful study should be done to evaluate and ameliorate the effect of road "improvements" on the homeless men and women who live, walk, and take buses along Route One. Friends recommend that both representatives from public and private agencies who know this population be consulted, including those of the Kennedy Center, Rising Hope United Methodist Missionary Church, New Hope Housing, Ventures in Community, and United Community Ministries. Safe crosswalks, sidewalks and/or trails for pedestrian traffic are important, as are safe and strategically located bus stops.

Visionary design could result from the assumption that these improvements are not being done mainly for increased automobile traffic. How could Route One be changed to be a transportation venue for the future? Safe and inviting pedestrian and bike paths should be important considerations. Varied types of public transit should be considered, with variations to match the needs of different constituencies. Landscaping to reclaim and keep a mix of open space and woods for rural flavor near historic sites should be blended with natural landscaping style for the roadside and sidewalks. Any opportunity to encourage travel by means other than individual automobile should be incorporated into the design. Friends hope that the sense of urgency for widening Route One does not prevent considerations needed for a far-sighted, inventive design that could set a standard for major roads throughout Northern Virginia. More of the same is not what is needed.

#### Friends' issues:

NOISE: Silent worship is at the heart of the Quaker practice of faith, historically and today. Silence, thus, is a part of the historic significance of our National Register-listed property. Friends are concerned that noise from Route One be controlled – by design, road surface, landscaping. We note that Marc Holma, for the Virginia SHPO, stated in a 12/17/03 letter to Fort Belvoir officials in regard to possible siting near the Meetinghouse of the National Museum of the United States Army: "Due to the importance that the Friends place on silent reflection in their worship services, DHR believes that a low ambient noise level around the meetinghouse is a characteristic that contributes to the significance of the property."

POSSIBLE RELOCATION OF THE WOODLAWN BAPTIST CHURCH CEMETERY: Friends are aware that alternatives for widening include moving the Woodlawn Baptist Church cemetery to allow for widening at that part of Route One. This cemetery has primary significance, of course, for the Baptist faith community and families of those buried there. However, it also has significance for the nearby historic properties, Woodlawn and the Friends' Meeting, because of their shared nineteenth-century history as interrelated members of the Woodlawn community. If the cemetery is to be relocated, the new site should be on land adjacent to the current Baptist Church property, to retain its significance to the Woodlawn Historic District and to all the properties who share its historic heritage. We request that the Army and FHWA determine how to provide Woodlawn Baptist Church such adjacent property for the cemetery in exchange for its land lost to Route One widening, as well as the necessary new road access at the traffic light at Woodlawn Road.

#### **MATERIALS:**

If the Figure 1 - Project Location Map is intended for future use, please correct the placement of the icons ("Cem" with red square) to identify the AMM Quaker cemetery and the Woodlawn Baptist cemetery. The Quaker cemetery is located behind the meetinghouse, not to its north, as shown on the map. The Baptist cemetery is across the Route One side of its property, not on the other side of Route One, as shown on the map. Ideally, an accurate new map showing the WHOD and all cultural resources will be created for use in the Section 106 consultation.

Friends thank you for this opportunity to comment.

### **Route One Improvements Project at Fort Belvoir - Comments**

Martha Claire Catlin Historian Alexandria Monthly Meeting of the Religious Society of Friends June 28, 2011

### **Public Scoping Meeting Record and Follow-through**

At the Public Scoping meeting held December 2, 2011, the informational materials stated:

All comments submitted at this meeting and during the comment period will be incorporated in the meeting record, which is subject to public review.

Thank you for making available the meeting record for the Public Scoping Meeting of December 2, 2011, including comments submitted. Although not available prior to the Section 106 consultation meeting on June 16, 2011, this information can now be found on the project list in the "Environment" section of the FHWA Eastern Federal Lands Website. However, public review and disclosure of the status of environmental review as project planning proceeds would be greatly facilitated by establishing a Route One Improvements Project Website. The record of the Section 106 process to date appears incomplete, based on the documents currently posted on the project list. A Project Website would facilitate Consulting Party participation in the Section 106 process, especially given the expedited schedule that has been put forward for completion of Section 106.

In addition, the project schedule in the Public Scoping Meeting materials included these two items:

Next Steps
☐ Study team review of public comments.
☐ Evaluation of suggestions and concerns and formulation of project purpose and
need

Please report the results of the study team's review of public comments and how they will inform the formulation of project purpose and need.

Friends are aware that several comment sheets were submitted that included specific comments about potential effects to historic properties, and that these comments were submitted within the stated comment period. Most or all of the commenters supplied contact information. However, these individuals were not contacted to be given an opportunity to participate in the Section 106 consultation meeting.

Please invite to the next Section 106 consultation meeting the individuals who provided comments with contact information, and whose comments pertained to, or showed a

demonstrated interest in, the project's effects to historic properties, pursuant to  $36 \ CFR \ 800.2(c)(5)$ .

#### **Initial Section 106 Meeting - June 16, 2011**

The FHWA consultant, Stuart Tyler, stated that the letter, dated June 7, 2011, that was sent to the invitees mistakenly cited 36 CFR 800.8(c)(1)(ii), "Identify historic properties and assess the effects of the undertaking on such properties . . .", as the step in the Section 106 process that was being carried out at this time. The Section 106 regulations at 36 CFR 800.8(c) outline a process using the National Environmental Policy Act and "the process and documentation required for preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 in lieu of the procedures set forth in §§ 800.3 through 800.6." Mr. Tyler indicated §§ 800.3 through 800.6 would be followed and that the reference in the letter of June 7, 2011 should have been 36 CFR 800.3(f), "Identify other consulting parties."

Please include this correction and clarification in the public record and make it available to the participants in the Section 106 consultation process. Please provide a clear written statement of the status of Section 106 that documents the steps in the process that have been carried out, how they were carried out, and which steps are next. For any steps that require public or Consulting Party involvement, please clarify the opportunity to participate in such steps.

An FHWA representative stated that the Advisory Council on Historic Preservation (ACHP) had declined to participate in the Section 106 process "at this time" but could reconsider in the future. It is unclear what process of notification to the ACHP resulted in this ACHP decision not to participate. Was this decision a response to notification of the ACHP pursuant to 36 CFR 800.8(c)? Or of adverse effect pursuant to 36 CFR 800.6(a)(1)? Did FHWA notify, or invite the ACHP to participate pursuant to 36 CFR 800.6(a)(1)(i)? In its notification to the ACHP, did FHWA apply the criteria for ACHP involvement outlined in Appendix A of the Section 106 regulations and provide the ACHP with documentation that would be relevant to the question of whether the Appendix A criteria are met for this undertaking?

Please include the FHWA notification to the ACHP and the ACHP's response to FHWA's notification in the public record and make these documents available to the participants in the Section 106 consultation process. If the notification was provided pursuant to 36 CFR 800.6(a)(1), in light of the requirement that the ACHP provide copies of its response to Consulting Parties, please provide the list of consulting parties submitted to the ACHP with its notification.

A National Historic Landmark, Woodlawn Plantation, is likely to be adversely affected by this undertaking.

Please clarify whether FHWA has notified the Secretary of the Interior and invited the Secretary to participate in the consultation pursuant to 36 CFR 800.10(c).

Jack Van Dop of FHWA stated that the Virginia State Historic Preservation Officer's (SHPO) representative, Marc Holma, was not available to attend the consultation meeting. Friends consider the SHPO a critical participant in the Section 106 process for this undertaking.

Please consider the Virginia SHPO's availability when scheduling future Section 106 meetings.

The letter to meeting invitees was dated June 7, 2011, nine calendar days before the meeting, which was scheduled on June 16, 2011.

#### Please provide reasonable notice of future Section 106 meetings.

Earl Flanagan, Fairfax County Commissioner, provided a verbal summary of the Route One Transit Study, which was recently funded by the Virginia General Assembly and is in its early stages. Based on Mr. Flanagan's information, it appears that the results of the Study could have broad implications for the Route One Improvements project, including definition of the undertaking and its area of potential effect, identification and evaluation of historic properties, selection of a preferred alternative, and mitigation for adverse effects to historic properties.

Please provide the Consulting Parties with FHWA's assessment of the relevance of the Route One Transit Study, and any related studies, to the Route One Improvements Project, and coordinate the planning for the Route One Improvements project with the Route One Transit Study, to ensure that, as relevant information from the Study becomes available, it is adequately factored into decisionmaking.

The initiation of the Section 106 process (36 CFR 800.3) includes an important provision at Section 800.3(b) for coordination of Section 106 with other authorities. In addition, 36 CFR 800.8(a), which outlines the federal agency's responsibilities to coordinate Section 106 with the National Environmental Policy Act, applies to this undertaking.

Please provide a timeline that identifies the specific points in the NEPA and Section 4(f) processes as they would intersect with the Section 106 consultation process, and consult with the Virginia SHPO, Fairfax County, and others, as appropriate, to ensure that the schedule for the Section 106 process takes into consideration, and coordinates with, any related ongoing federal, state, or county review processes.

As stated above, Mr. Tyler stated that the status of the Section 106 process is at implementation of 36 CFR 800.3(f). It is not clear, however, whether invitation to participate in the meeting constituted invitation to participate in the Section 106 process as a Consulting Party.

Please clarify whom FHWA has invited to become a Consulting Party, and whether a written request is necessary for becoming recognized by FHWA as a Consulting Party.

Mr. Tyler stated that the boundaries of the Woodlawn Historic District "may have changed."

Please clarify the boundaries of the Woodlawn Historic District as recognized by FHWA for this undertaking, and how the boundaries may have changed.

Auditory effects were mentioned but little information was given.

Please include in your analysis of effects to historic properties that noise effects are a serious concern for the Woodlawn Quaker Meetinghouse. Silent worship, a religious practice of Friends, is included among the ongoing traditional uses that represent characteristics that qualify the Woodlawn Quaker Meetinghouse for the National Register of Historic Places (the property was listed on the National Register in 2009). In addition, such qualifying National Register characteristics are protected by a historic preservation easement held by the Virginia Board of Historic Resources (VBHR). The National Register nomination is incorporated as a part of, and attached to, the VBHR preservation easement.

It was stated that the Route One Improvement project is on a fast track and that participants must respond with any comments within a two-week period from the date of the meeting of June 16, 2011.

Please provide more reasonable timeframes for comments by participants. Please recognize that very little information has been distributed and therefore, comments by newly involved participants must by their nature be preliminary and exploratory. It is critical that alternatives to avoid, minimize, or mitigate adverse effects to historic properties not be foreclosed for lack of timeframes to allow for their consideration. Among the technologies that would be important to assess for use in this project is that of ''Quiet Pavement'' technology, which has been used successfully in Arizona, California, other U.S. locations, and Europe. Please begin any groundwork necessary to ensure that these pavement methods are fully considered. Please consult available information within FHWA and elsewhere to ensure consideration of Quiet Pavement technology:

#### Asphalt Institute

http://www.asphaltinstitute.org/Upload/Quiet\_Pavement\_Coming\_To\_Highway\_Near\_You\_995791427\_721200508573.pdf

Rubber Pavements Association
http://www.rubberpavements.org/RPA\_News/sum2007/2007\_RPA\_VOL\_10\_No\_2\_PD
F Version1.pdf

Quiet Pavement is consistent with the Commonwealth of Virginia's policies. According to an article From: <u>Concrete Construction</u> Posted on: May 26, 2011, "Legislation Directs VDOT to Conduct Pilot Projects Using 'Quiet-Pavement' Materials: New technologies could reduce highway tire noise and save money":

Del. Jim LeMunyon (R-Fairfax) sponsored HB 2001, which amends and strengthens the 2009 Virginia law requiring VDOT to consider using pavement materials that reduce tire noise when resurfacing appropriate roads (Code of Virginia § 33.1-223.2:21). 1

The Quiet Pavement Task Force is a cooperative group consisting of representatives from VDOT and the asphalt and concrete paving industries. The group studies and identifies roads around the Commonwealth that would be candidates for quiet-pavement installations.

Please consult the Quiet Pavement Task Force so that their expertise can inform planning for the Route One Improvements project. Please provide information to Consulting Parties about the alternative paving technologies that will be considered for their noise reduction characteristics in the Section 106 process for the Route One Improvements Project.

§ 33.1-223.2:21. Noise abatement practices and technologies.

Whenever the Commonwealth Transportation Board or the Department plan for or undertake any highway construction or improvement project and such project includes or may include the requirement for the mitigation of traffic noise impacts, consideration should be given to the use of noise reducing design and low noise pavement materials and techniques in lieu of construction of noise walls or sound barriers. Landscaping in such a design would be utilized to act as a visual screen if visual screening is required.

Text of Law as amended:

#### **CHAPTER 476**

An Act to amend and reenact § 33.1-223.2:21 of the Code of Virginia, relating to noise abatement practices and technologies. [H 2025] Approved March 24, 2011

Be it enacted by the General Assembly of Virginia:

**1. That § 33.1-223.2:21 of the Code of Virginia is amended and reenacted as follows:** § 33.1-223.2:21. Noise abatement practices and technologies.

Whenever the Commonwealth Transportation Board or the Department plan for or undertake any highway construction or improvement project and such project includes or may include the requirement for the mitigation of traffic noise impacts, *first* consideration should be given to the use of noise reducing design and low noise pavement materials and techniques in lieu of construction of noise walls or sound barriers. *Vegetative screening, such as the planting of appropriate conifers,* in such a design would be utilized to act as a visual screen if visual screening is required.

<sup>&</sup>lt;sup>1</sup> Text of law before amendment:

### Specific Items for which Comments are Requested by FHWA by June 30, 2011

• "Should any other Consulting Parties be invited to join the process?"

As the entity with an interest in African American history of the Mount Vernon area, representatives of the Gum Springs Historical Society should be invited to participate as Consulting Parties.

Representatives of Pohick Church should be invited to participate as Consulting Parties.

Representatives of Accotink Methodist Church should be invited to participate as Consulting Parties.

Representatives concerned for the preservation of the historic village of Accotink should be invited to participate as Consulting Parties.

Martha Claire Catlin, Historian, Alexandria Monthly Meeting of the Religious Society of Friends. I request that I be provided a response to my written request to participate as a Consulting Party.

All individuals whose comments in the scoping process pertained to the project's potential effects to historic properties.

Descendants of individuals buried in the Woodlawn Baptist Church Cemetery.

The Advisory Council on Historic Preservation, pursuant to 36 CFR 800.6(a)(1)(i).

The Secretary of the Interior, pursuant to 36 CFR 800.10(c).

The Superintendent of the George Washington Memorial Parkway.

• "Should the APE be modified, and if so, what is your suggestion on the change in boundaries?"

Include the Village of Accotink and areas along Backlick Road within the Area of Potential Effect.

Include borrow areas, construction staging areas, and all lands and environments associated with other construction-related activities.

Ongoing consideration of any needed changes to the Area of Potential Effect should be pursued in consultation with Fort Belvoir.

Any proposed action that would result in limiting alternatives that could avoid, minimize, or mitigate adverse effects on historic properties in areas along Route One located north of the project would require expansion of the Area of Potential Effect to those areas.

Any proposed action that would result in effects to historic properties, such as George Washington's Gristmill, or the George Washington Memorial Parkway, properties listed on the National Register of Historic Places, would require expansion of the Area of Potential Effect to the potentially affected areas.

• "Are there any other cultural resources not identified at the meeting that you believe should be considered for this undertaking?"

The site of the Woodlawn Community House, a building erected in 1922 on a one-acre lot adjoining the entrance to Camp A.A. Humphreys, should be identified, evaluated, and protected. The site is located adjacent to Belvoir Road on the north side of the road, and is likely within or near the currently proposed boundaries of the Area of Potential Effect for the Route One Improvement Project. I would be pleased to share my research with FHWA and Fort Belvoir to assist in ensuring that this site is considered in the Section 106 process for the Project. Two of the three trustees with responsibility for the Woodlawn Community House were members of the Quaker Meeting at Woodlawn. The Woodlawn Circle of King's Daughters managed the property until at least 1938, the 50-year anniversary of the Woodlawn Circle. Many local residents of Woodlawn and Accotink, especially children, participated in community service activities that took place there. The land was donated by Hugh and Frances A. Keneipp from Gray's Hill land that had been part of Woodlawn Quaker settler Thomas Wright's farm.

The "Architectural Properties" section of the document, "Environmental Assessment for Route 1 Improvements at Fort Belvoir For Federal Highway Administration Eastern Federal Lands Highway Division: Historic Properties within the APE," provided at the meeting held June 16, 2011 refers to the Woodlawn historic property only as the Woodlawn National Historic Landmark; however, the full extent of the Woodlawn Plantation historic property that is listed on the National Register of Historic Places, including its component historic properties such as Grand View and the Otis Mason house, should be identified as historic properties in Section 106 documentation.

The "Archeological Properties" section of the above-referenced document cannot be comment upon without additional information. Please provide maps, site reports, and results of documentary research that would identify historic land ownership for each of the six archaeological sites identified as "recommended for further study."

"Are there any other issues that should be addressed in this NEPA document?"

Noise impacts.

Pedestrian safety and environmental justice.

Traffic calming.

Design excellence.

Compatibility of design with historic properties and the Woodlawn Historic District.

Accommodation of pedestrians and the users of the Potomac Heritage Trail.

Compatibility of landscape treatments.

Strategies to reduce future traffic volumes by providing alternative access points to Fort Belvoir and alternative routes for through traffic that would allow vehicles to bypass Fort Belvoir and the Woodlawn Historic District.

Strategies to allow public transportation to be placed outside the right-of-way, or underground, and thereby reduce the extent of widening needed.

Potential impacts on the human or natural environment for the portion of Route One north of the project area.

Potential impacts on the human or natural environment in areas along Mount Vernon Memorial Highway and the George Washington Memorial Highway.