



Final Environmental Assessment

For the National Foreign Affairs Training Center (NFATC)
2017 Master Plan Update



Prepared by:
The U.S. General Services Administration

April 2017



APPENDIX C. SECTION 106 CONSULTATION

Part 2 of 2

Determination of Effects Memorandum

For the Environmental Assessment (EA) of the
George P. Shultz National Foreign Affairs Training Center (NFATC)
2016 Master Plan Update, Arlington, Virginia

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Submitted to:
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and
U.S. General Services Administration

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INTRODUCTION

This report applies the Advisory Council on Historic Preservation's revised Criteria of Adverse Effect (36 CFR 800.5) to the Proposed Action (Build Alternative 1) presently under consideration in the National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update. Relevant authorities for the work described herein include Section 106 of the National Historic Preservation Act of 1966, as amended; the Advisory Council on Historic Preservation revised regulations on the "Protection of Historic Properties" (36 CFR 800); the National Environmental Policy Act of 1969; and the requirements of the Virginia Department of Historic Resources (DHR).

PROJECT DESCRIPTION

Master Plan Update: Purpose, Need, and Objectives

The NFATC 2016 Master Plan Update will document the physical requirements and architectural and engineering intent for improvements to this campus for classroom training and distance learning for the U.S. Department of State (DOS). The programs and support offered through NFATC equip DOS professionals with the knowledge and skills needed to carry out the department's diplomatic mission throughout the world. World events and maintenance of U.S. diplomatic leadership place increasing demands on U.S. diplomatic professionals. The 2016 Master Plan Update lays the groundwork for phased improvements to this essential facility needed to accommodate its evolving training mission, as well as its ever-changing population (on-site and distance learners) over the next decade.

The NFATC is comprised of two major parcels: a 65 +/- acre main academic campus, and the 7 +/- acre West Parcel used by FSI for satellite parking and, by Memorandum of Agreement with Arlington County, as a public park (Figures 1-4). The area of the buildings on the NFATC campus now totals approximately 623,500 gross square feet. With the implementation of this Master Plan Update, the primary uses of the NFATC campus will remain unchanged. Objectives of the NFATC 2016 Master Plan Update include having the ability to:

- Provide facilities that can simultaneously support training of:
 - Foreign Service personnel and their families
 - Other DOS employees (domestic and overseas)
 - Other Federal Agency employees and U.S. military personnel
 - Government Contractors.
- Provide innovative, technology-enabled classrooms that support interactive, experiential training methodology, as well as blended and mentored e-learning.
- Provide IT facilities, equipment, and personnel space to support the increased requirements for technology based distance learning for domestic and overseas staff.
- Accommodate the planned 2020 consolidation of offsite FSI classroom training facilities from other National Capital Region locations.
- Provide additional facilities to train and support existing programs and recently levied training requirements that are driving training demand beyond current campus capacity, as well as accommodate training requirements for the increased population projected by DOS.
- Provide instructional ancillary space including testing facilities, independent and group study space, faculty/staff offices, and the necessary added facility infrastructure support.
- Provide adequate childcare, parking, student study/collaboration, and other information resources and amenities to support users of FSI services from the foreign affairs community at large. Unlike those who live or will be in an area for an extended period of time, these students

come to FSI while in transition for a year or less. They are often not able to get their names on “childcare waiting lists” or to prepare properly for their assignments if there is inadequate childcare or parking while they are in FSI training.

- Maintain historic buildings and greenspace on the campus and meet historic preservation requirements.
- Comply with local, state, and federal environmental requirements, including stormwater management and energy conservation.
- Plan for expansion and renovation of campus facilities in a manner consistent with the original Master Plan (1989) and its 2005 update.

To achieve these objectives, the DOS anticipates the 2016 Master Plan Update will require phased construction of several new buildings and phased expansions to existing buildings (Figures 5-9). At this time, the general consensus is the improvements listed below are necessary. However, future improvements and future square footage needs will be identified through the NEPA process and documented in the EA.

- **Building B** - A new training/classroom building of 200,000 +/- GSF
- **Child Care Facility Expansion**--An addition of 10,000 GSF to the existing Child Care Facility
- **Building F Expansion** - A 75,000 +/- GSF expansion of Building F
- **Building K Expansion** - A 12,000 +/- GSF multi-purpose space expansion of Building K
- **Building K Expansion** – A 25,000 +/- GSF office/classroom expansion to Building K
- **Visitor Center Expansion** –A 6,800 +/- GSF visitor processing expansion to the Visitor Center
- **Physical Security Enhancements** – Includes new perimeter fencing as shown in Figures 6 and 7, as well as improvements to the following access points:
 - 1) Arlington Boulevard Gate (primary entrance): new security booth, wedge barriers, bollards, and pedestrian fencing.
 - 2) S. George Mason Drive Gate (secondary entrance): new 8ft gates, bollards, and pedestrian fencing.
 - 3) S. Quincy Street Gate: new double swing gate, anti-ram fence, boulders, and 6ft earth berm.
 - 4) West Parcel Pedestrian Underpass for Parking: new turnstile, new anti-climb fence, new accessible sidewalk to S. George Mason Drive.
 - 5) The existing southern walking/bike trail will be closed to comply with enhanced security requirements.

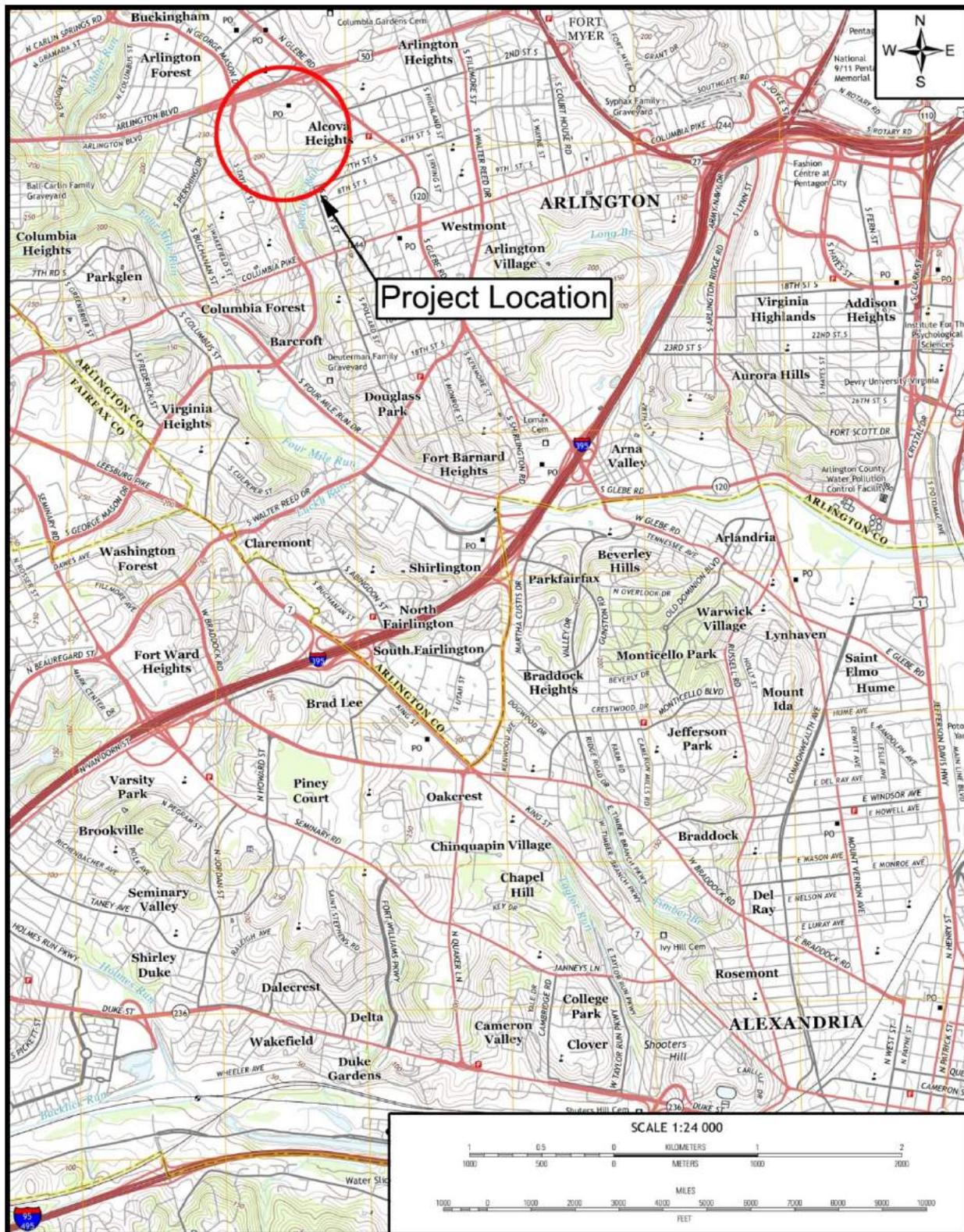


Figure 1: Project location shown on the Alexandria, Virginia 7.5-minute quadrangle (USGS 2013).

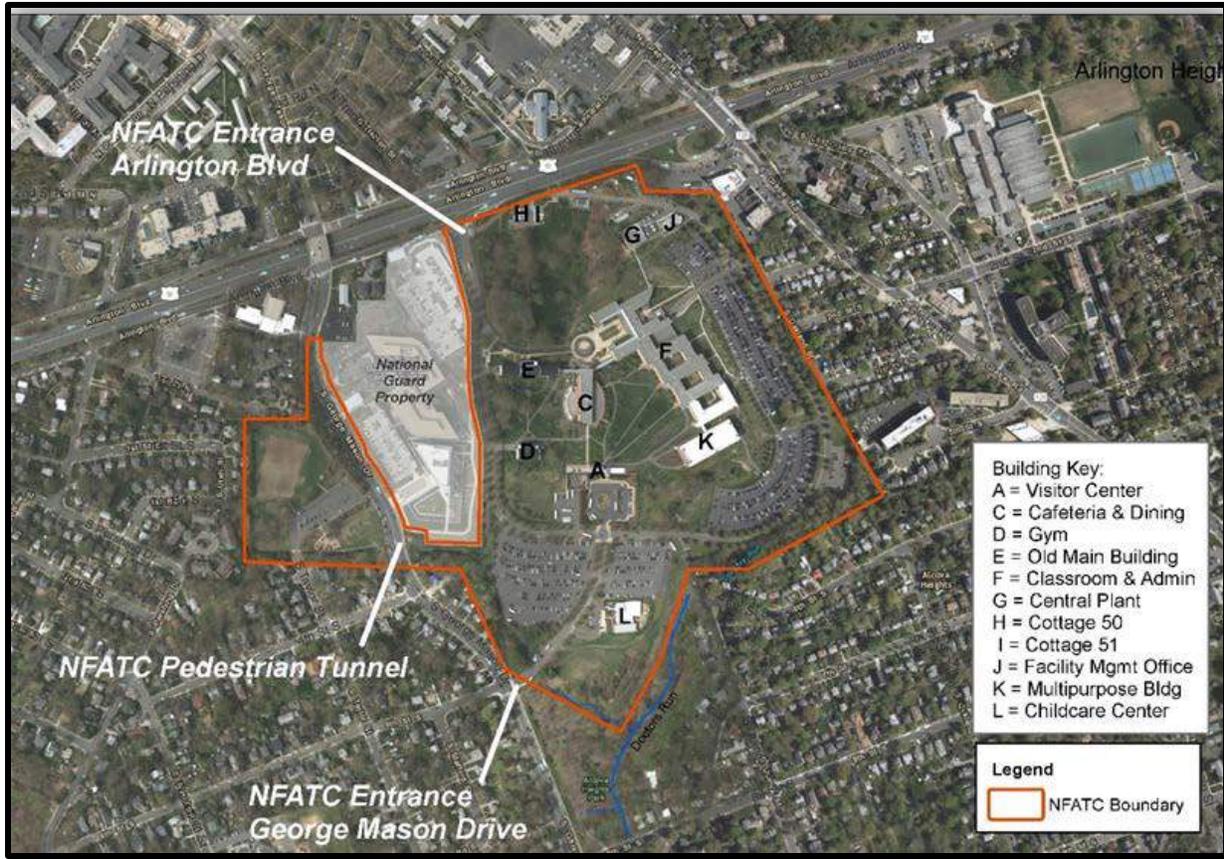


Figure 2: Overview of NFATC Campus.

Figure 3: Existing Conditions - National Foreign Affairs Training Facility (NFATC)

Building Key	
Bldg A - Visitors Center	3,200 SF (plus 6,400 Rec/Control)
Bldg C - Cafeteria & Dining	43,900 SF
Bldg D - Gym	12,480 SF
Bldg E - Old Main Building	43,000 SF
Bldg F - Classroom and Administration	391,450 SF
Bldg G - Central Plant	6,400 SF
Bldg H - Cottage 50	5,760 SF
Bldg I - Cottage 51	5,760 SF
Bldg J - Facility Management Office	6,456 SF
Bldg K - Multipurpose Building	87,850 SF
Bldg L - Childcare Center	10,891 SF
623,547 SF TOTAL	



3234-002-14

1" = 300'-0"

NFATC



Figure 3: Site Plan of Existing Conditions at the NFATC Facility.



Figure 4: Bird's Eye View of Existing Conditions at the NFATC Facility, facing south.



Figure 5: Overview of New Buildings Proposed in NFATC Master Plan Update.



Figure 6: Overview of Existing Fencing at the NFATC.

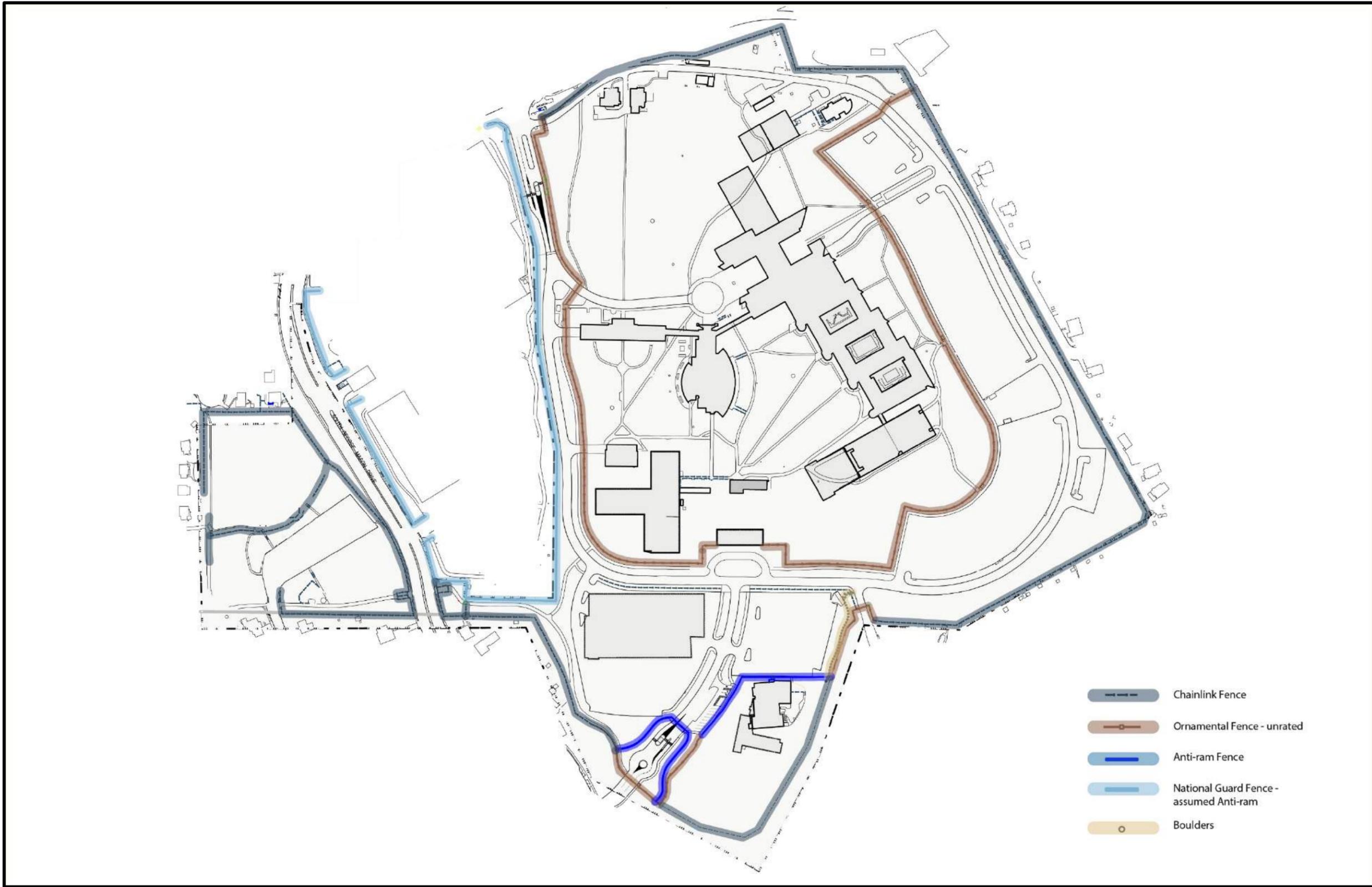


Figure 7 Overview of Proposed Fencing at the NFATC.

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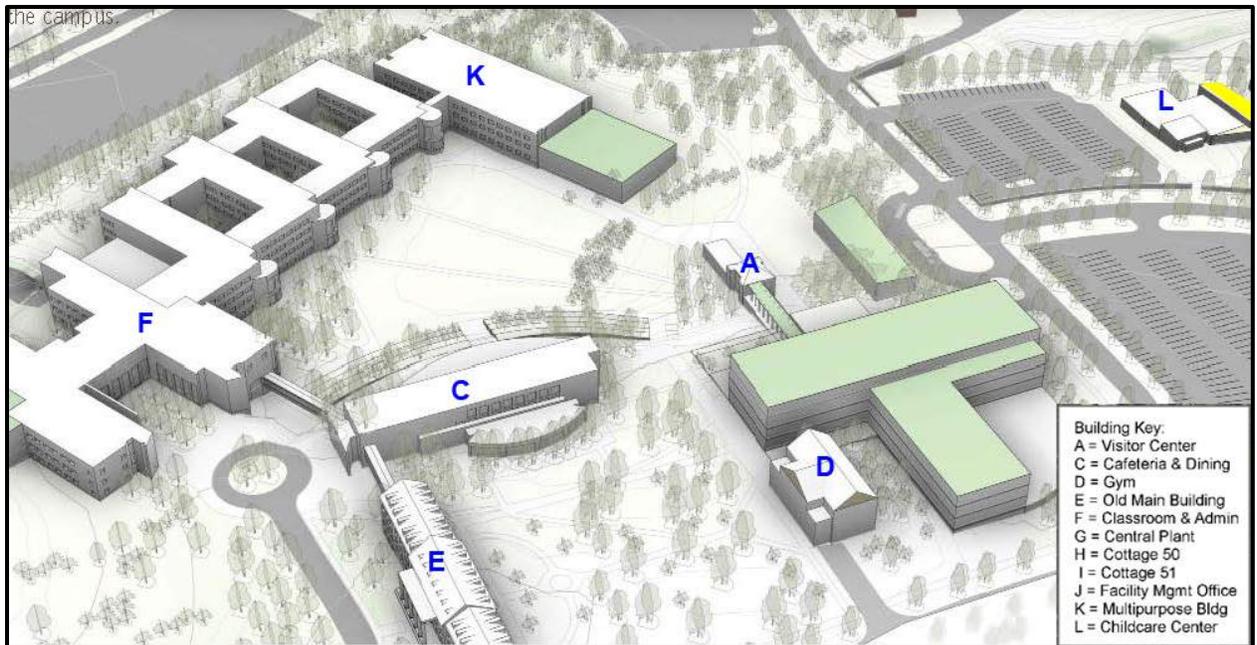


Figure 8: Detail of New Buildings Proposed (indicated in green and yellow) in the NFATC 2016 Master Plan Update, facing southeast.

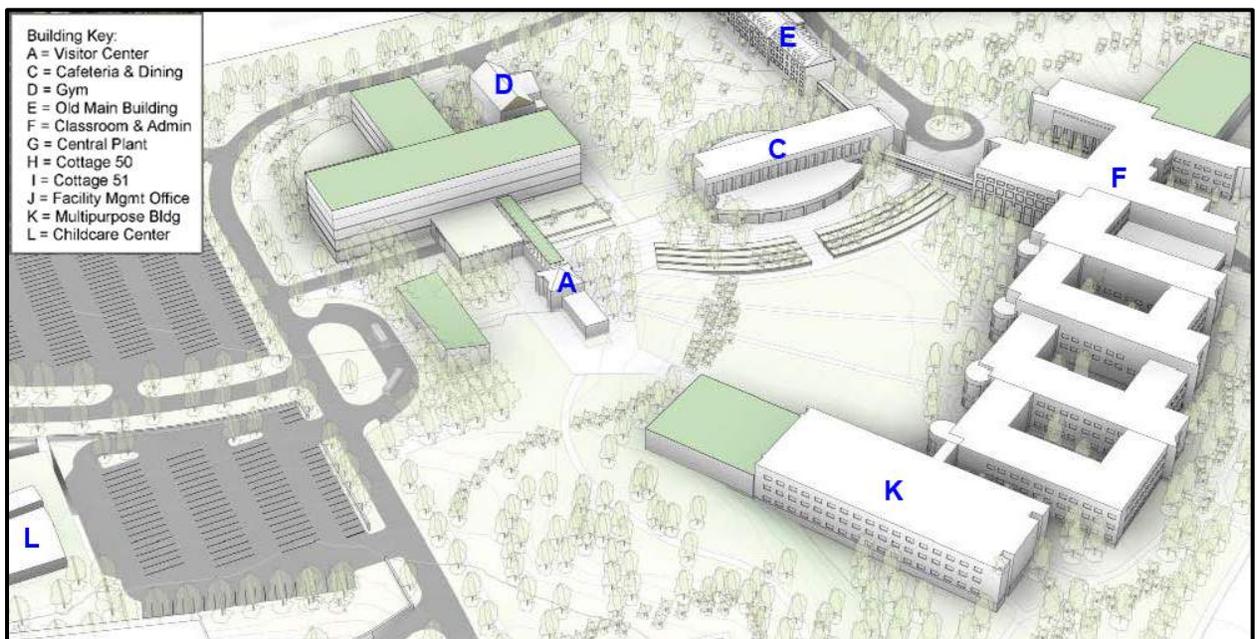


Figure 9: Detail of New Buildings Proposed (indicated in green) in the NFATC 2016 Master Plan Update, facing northwest.

ALTERNATIVES

Three Build Alternatives were initially developed for the NFATC 2016 Master Plan Update. Two of the three alternatives were eliminated from consideration because they did not meet the project's purpose and need. This Effects Memorandum analyzes anticipated effects for the Proposed Action (Build Alternative 1). Graphics showing the build elements of Build Alternatives 2 and 3 are shown in Figures 10 and 11. A description of Alternatives 2 and 3 and a discussion of why each alternative was not carried forward appear in the following paragraphs. The forthcoming EA documents the impacts of these three Build Alternatives and the No-Action Alternative, as well as provides the basis for elimination of Build Alternatives 2 and 3. The 2016 Master Plan Update will establish design and planning principles to guide the efforts associated with integrating existing and new buildings, access points and roadways, open/green space, utility systems, infrastructure, and other site elements in a sustainable way that yields a unified campus environment.

Build Alternative 2 Description (Eliminated)

Alternative 2 is consistent with previously approved Master Plans and subsequent Updates. This alternative consolidates previously identified, smaller construction projects and provides flexibility to accommodate growth as needed. Alternative 2 includes a total area (new and existing) of approximately 935,000 square feet of occupied space. Alternative 2 would provide an additional 335,789 square feet of new and expanded facilities, which includes the following additions to the campus (Figure 10).

1. An addition to the east side of the existing Visitor Center (Building A). This alternative would retain the circular drop-off and limited visitor parking to the south of the Visitor Center.
2. A training wing addition to the northwest side of Building F.
3. An addition to the Chiller Plant (Building G), as needed, to supplement campus expansion.
4. Two additions to Building K; an auditorium addition to the west and an additional training floor above the existing building.
5. A new training building (Building B) located south of the existing Gym (Building D).
6. An addition to the north side of the Childcare Facility (Building L).

In addition, Alternative Two includes the following Physical Security Enhancements, which are common to all three build alternatives. New perimeter fencing will be installed as shown in Figures 6 and 7, as well as improvements to the following access points:

- Arlington Boulevard Gate (primary entrance): new security booth, wedge barriers, bollards, and pedestrian fencing.
- S. George Mason Drive Gate (secondary entrance): new 8ft gates, bollards, and pedestrian fencing.
- S. Quincy Street Gate: new double-swing gate, anti-ram fence, boulders, and 6ft earth berm.
- West Parcel Pedestrian Underpass for Parking: new turnstile, new anti-climb fence, new accessible sidewalk to S. George Mason Drive.
- The existing southern walking/bike trail will be closed to public access to comply with enhanced security requirements.



Figure 10: Rendering of proposed elements of Alternative 2, view facing north. Existing buildings are labelled according to their designated letter names.

Build Alternative 2 was eliminated from further consideration because it would not address or meet the project purpose and need for the following reasons:

- There are shortcomings in the campus multi-modal transportation circulation that compromise pedestrian safety. This is counter to the objectives of upgrading physical security and improving campus amenities to support FSI programs.
- The proposed pedestrian circulation within the academic heart of the NFATC campus does not meet FSI programmatic requirements.
- With new security requirements, an addition to the Visitor Center (Building A) would not adequately solve the problems of screening visitors in an efficient and timely manner. A new building would better meet the current security requirements.
- The addition to the Childcare facility (Building L), located to the north of the existing building, would be more costly as it requires the elimination and relocation of approximately 91 parking spaces in Lot P2. Also, a substantial number of utility mains located in the parking lot would require relocation, including the main electric feed, as well as telecommunication lines and storm drain lines.
- The addition to the Childcare Center does not meet the perimeter security setback requirements; cost-prohibitive security enhancements would be needed to maintain the perimeter security requirements.
- A portion of the Childcare Center addition encroaches on the resource protection area (RPA) along Doctors Run.

- The expansion of Building K, which adds an upper floor to the existing building, would be too disruptive to the campus and would require significant construction challenges to protect the safety of staff and existing, nearby buildings.

Build Alternative 3 Description (Eliminated)

Alternative 3 consolidates the bulk of future programmatic requirements into a compact massing of buildings located on or near the southern parts of the NFATC campus. Alternative 3 provides for a new Visitor Center building that is south of the existing Visitor Center. To provide space, the entry drop-off is reconfigured and made smaller. Alternative 3 would reconfigure the entry sequence at the S. George Mason Drive gate and the roads in the southern portion of the main campus. Alternative 3 includes a total area (new and existing) of approximately 943,955 square feet of occupied space. Alternative 3 would provide an additional 330,008 square feet of new space, which includes the following additions to the campus (Figure 11).

1. A New Visitor Center southeast of the existing Visitor Center (Building A) and southwest of Building K. The existing Visitor Center (Building A) will be repurposed as a student study center.
2. A new training building southwest of Building K.
3. A new training building (Building B) located south of the existing Gym (Building D).
4. An addition to the east side of Childcare Facility (Building L).

In addition, Alternative Three includes the following Physical Security Enhancements, which are common to all three build alternatives. New perimeter fencing will be installed as shown in Figures 6 and 7, as well as improvements to the following access points:

- Arlington Boulevard Gate (primary entrance): new security booth, wedge barriers, bollards, and pedestrian fencing.
- S. George Mason Drive Gate (secondary entrance): new 8ft gates, bollards, and pedestrian fencing.
- S. Quincy Street Gate: new double swing gate, anti-ram fence, boulders, and 6ft earth berm.
- West Parcel Pedestrian Underpass for Parking: new turnstile, new anti-climb fence, new accessible sidewalk to S. George Mason Drive.
- The existing southern walking/bike trail will be closed to comply with enhanced security requirements.

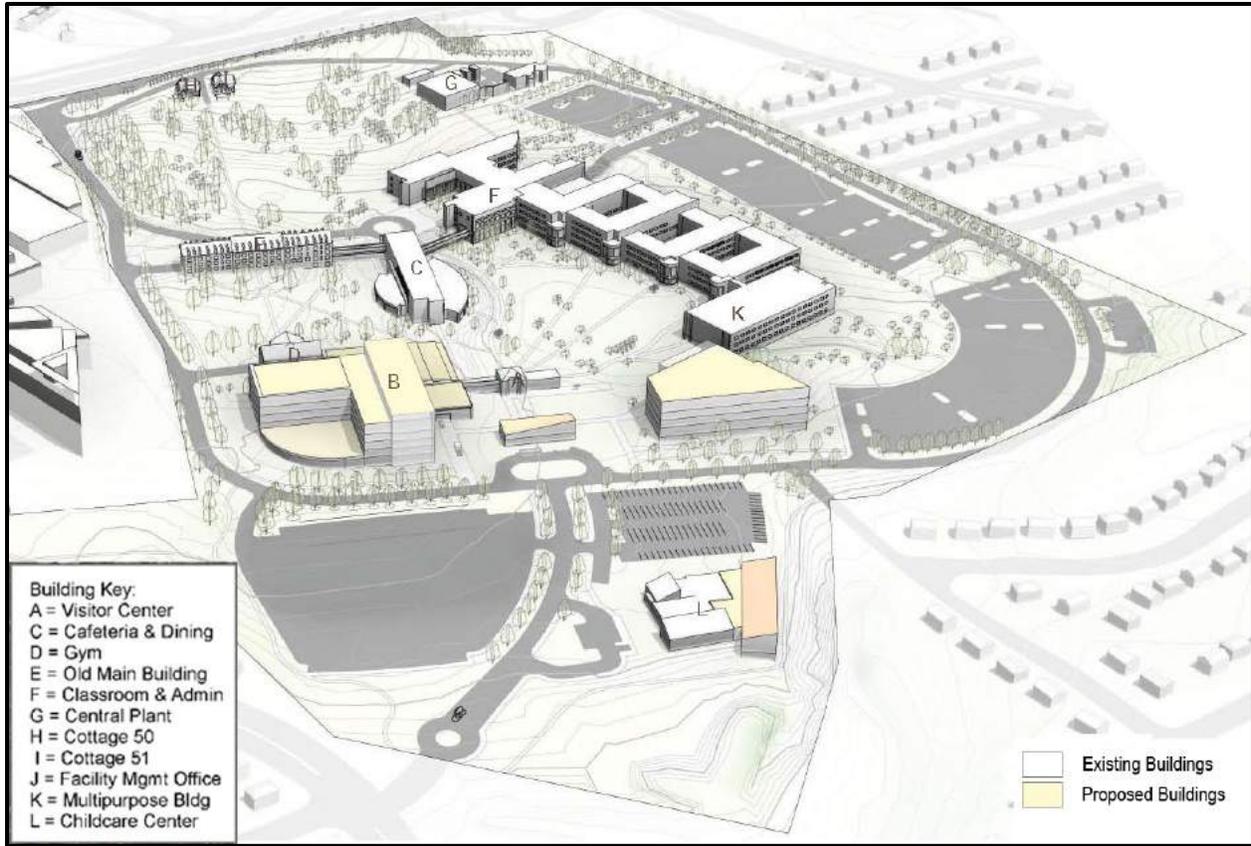


Figure 11: Rendering of proposed elements of Alternative 3, view facing north. Existing buildings are labelled according to their designated letter names.

Build Alternative 3 was eliminated from further consideration because it would not address or meet the project purpose and need for the following reasons:

- The addition to the Childcare Center does not meet the perimeter security setback requirements; cost-prohibitive security enhancements would be needed to maintain the perimeter security requirements.
- A portion of the Childcare Center addition encroaches on the resource protection area (RPA) along Doctors Run.
- The locations of the new Visitor Center and new Building K in Build Alternative 3 would not meet FSI program adjacency requirements.
- Building K would be within the Visitor Center Test Area, an area with the potential to yield archaeological resources and an area requiring a Phase 1 archaeology survey prior to ground-disturbing activity.
- Build Alternative 3 would not include a Central Plant expansion, potentially impacting the infrastructure improvements identified as needed in the project's Purpose and Need statement.
- The reconfiguration of the road on the south requires more site improvements, which would be disruptive to entering and exiting of the campus.

HISTORIC PROPERTIES

Three historic properties are present within the Area of Potential Effects (APE) for historic resources, as indicated in Table 1 and Figure 12.

Table 1: Historic Properties Located Within the APE for Historic Resources

Property Name	VDHR #	National Register Status
Arlington Hall Station Historic District	000-0018	Determined Eligible (by Keeper)
Barcroft Historic District	000-7818	Determined Eligible (by consensus)
Alcova Heights Historic District	000-4867	Eligible*

*GSA is assuming that this property is NRHP-eligible for the purposes of Section 106 consultation.

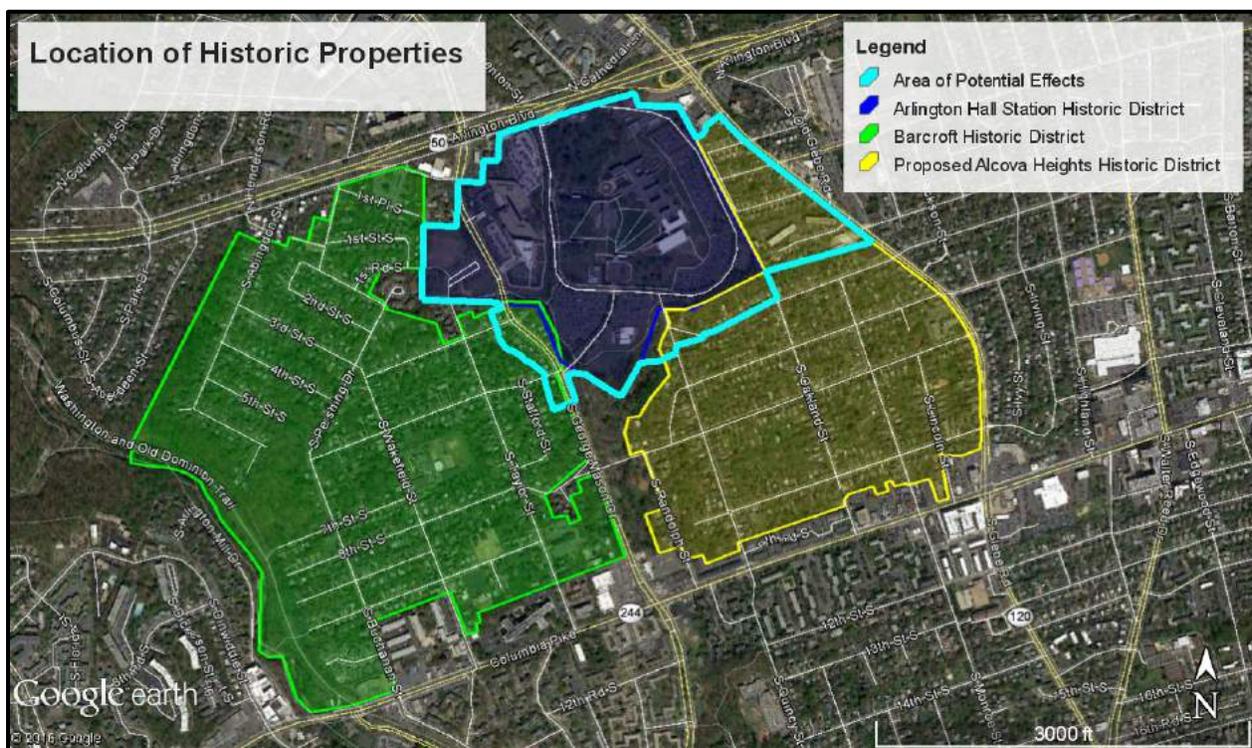


Figure 12: Location of historic properties depicted on Google Earth aerial mapping (2015).

DETERMINATION OF EFFECT

METHODOLOGY

Because National Register of Historic Places (NRHP)-eligible properties exist within the project APE, it is necessary to assess potential project effects. Potential project effects were assessed based upon the guidelines specified in the Section 106 Regulations (as amended August 5, 2004), as published in the Federal Register and on the Advisory Council for Historic Preservation's website.

DEFINITION OF EFFECT

According to 36 CFR 800.16(i), an *Effect* is defined as an alteration to the characteristics of a historic property that qualify it for inclusion in, or eligibility for, the NRHP. The two possible results of identification and evaluation are as follows:

No Historic Properties Affected

If the Agency Official finds that either there are no historic properties present or there are historic properties present but the undertaking will have no effect upon them as defined in 36 CFR 800.16(i), the Agency Official shall provide documentation of this finding, as set forth in 36 CFR 800.11(d), to the State Historic Preservation Office (SHPO)/Tribal Historic Preservation Office (THPO). The Agency Official shall notify all consulting parties, including Indian tribes and Native Hawaiian organizations, and make the documentation available for public inspection prior to approving the undertaking. If the SHPO/THPO (or the ACHP, if it has entered the Section 106 process) does not object within 30 days of receipt of an adequately documented finding, the Agency Official's responsibilities under Section 106 are fulfilled.

Historic Properties Affected

If the Agency Official finds that there are historic properties that may be affected by the undertaking, the Agency Official shall notify all consulting parties, including Indian tribes or Native Hawaiian organizations, and invite their views on the effects and assess adverse effects, if any, in accordance with 36 CFR 800.5. If the SHPO/THPO objects within 30 days of receipt of an adequately documented finding, the Agency Official shall either consult with the objecting party to resolve the disagreement or forward the finding and supporting documentation to the Council and request that the Council review the finding pursuant to 36 CFR 800.4(d)(1)(iv). When an Agency Official forwards such requests for review to the Council, the Agency Official shall concurrently notify all consulting parties that such a request has been made and make the request documentation available to the public.

CRITERIA OF ADVERSE EFFECT

An *Adverse Effect* is found when an undertaking may alter, directly or indirectly, the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for inclusion in the NRHP. Adverse effects may include reasonably foreseeable impacts that could be caused by the undertaking and that may be cumulative, may occur later in time, or may occur farther removed in distance. Adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;

- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features; and
- (vi) Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance (36 CFR 800.5(a)(2)).

RESULTS OF ASSESSMENT OF ADVERSE EFFECT

No Adverse Effect

The Agency Official shall maintain a record of the finding and provide information on the finding to the public on request, consistent with the confidentiality provisions of 36 CFR 800.11(c). Implementation of the undertaking in accordance with the finding, as documented, fulfills the Agency Official's responsibilities under Section 106 and 36 CFR 800.11. If the Agency Official will not conduct the undertaking as proposed in the finding, the Agency Official shall reopen consultation under Section 800.5 (a).

Adverse Effect

If an Adverse Effect is found, the Agency Official shall consult further to resolve the Adverse Effect pursuant to 36 CFR 800.6, which describes the resolution of Adverse Effect. The procedures for resolution include continuing consultation with the agency and the SHPO, resolving Adverse Effects, and preparing a Memorandum of Agreement (MOA).

APPLICATION OF DEFINITION OF EFFECT AND CRITERIA OF ADVERSE EFFECT: PROPOSED ACTION

PROPOSED ACTION (BUILD ALTERNATIVE 1) DESCRIPTION

The Proposed Action (Build Alternative 1) is generally consistent with previously-approved Master Plans and subsequent updates. Alternative 1 provides for a new Visitor Center building that is south of the existing Visitor Center (Building A). To provide space, the entry drop-off is reconfigured and made smaller. Alternative 1 includes a total area (new and existing) of approximately 935,000 square feet of occupied space. Alternative 1 would provide an additional 310,762 square feet of new or expanded facilities. Expanded or new construction would occur incrementally, as needed and as funding is available. Alternative 1 includes the following additions to the campus (Figure 13).

1. A new Visitor Center would be constructed south of the existing Visitor Center (Building A). The existing Visitor Center would be repurposed as a student study center.
2. A new training wing addition north of Building F.
3. An addition to the Chiller Plant (Building G), as needed, to supplement campus expansion.
4. An addition to the southwest side of Building K.
5. A new training building (new Building B) located south of the existing Gym (Building D).
6. An addition to the south and west sides of the Childcare Facility (Building L).

In addition, Alternative 1 includes the following Physical Security Enhancements, which are common to all three build alternatives. New perimeter fencing will be installed as shown in Figures 6 and 7, as well as improvements to the following access points:

- Arlington Boulevard Gate (primary entrance): new security booth, wedge barriers, bollards, and pedestrian fencing.
- S. George Mason Drive Gate (secondary entrance): new 8ft gates, bollards, and pedestrian fencing.
- S. Quincy Street Gate: new double-swing gate, anti-ram fence, boulders, and 6ft earth berm.
- West Parcel Pedestrian Underpass for Parking: new turnstile, new anti-climb fence, new accessible sidewalk to S. George Mason Drive.
- The existing southern walking/bike trail will be closed to public access to comply with enhanced security requirements.

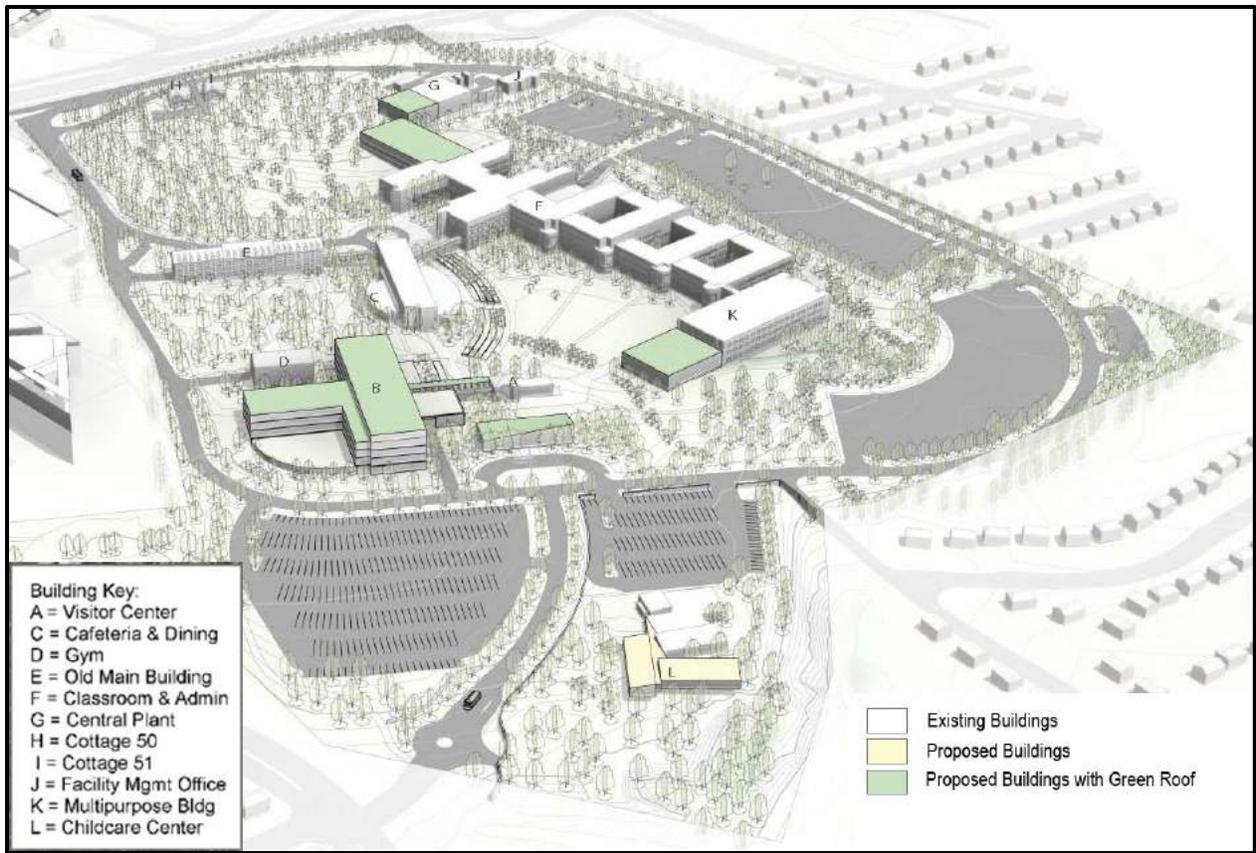


Figure 13: Rendering of proposed elements of Alternative 1, view facing north. Existing buildings are labelled according to their designated letter names.

ARLINGTON HALL STATION HISTORIC DISTRICT

Description of Historic Property

The history of the Arlington Hall Station Historic District has been documented in previous cultural resources reports (Browne, Eichman, et al. 1988; Metcalf and Associates 1988) and the Historic American Buildings Survey for Arlington Hall Station (John Milner Associates, Inc. 1989). These studies were conducted prior to the transfer of the facility from the U.S. Army to the DOS. When Arlington Hall Station was determined eligible for listing in the NRHP in 1988, the then 86.5-acre campus contained the original buildings of the Arlington Hall Junior College (1924-1942) and the buildings constructed during World War II when the federal government acquired the property to relocate the U.S. Signal Intelligence Service from Washington, DC. At the time of the determination of NRHP eligibility, the historic district contained as contributing features, all buildings, structures, and landscape features constructed prior to 1946, including all temporary, semi-permanent, and permanent World War II buildings. In 1989, GSA and DOS entered into a Memorandum of Agreement with the Virginia SHPO for the transfer of the property to DOS. Between 1989 and 2016, all World War II-era buildings were demolished and replaced with new construction. Extant contributing features to the historic district include two cottages (ca. 1924-26), the meadow, the pond bridges (ca. 1928), the administration building (1927-28), and the gymnasium (1928). All of these contributing features are clustered within a core area that was the historic quadrangle when the site functioned as Arlington Hall Junior College between 1924 and 1942, prior to government acquisition of the property (Figure 14).

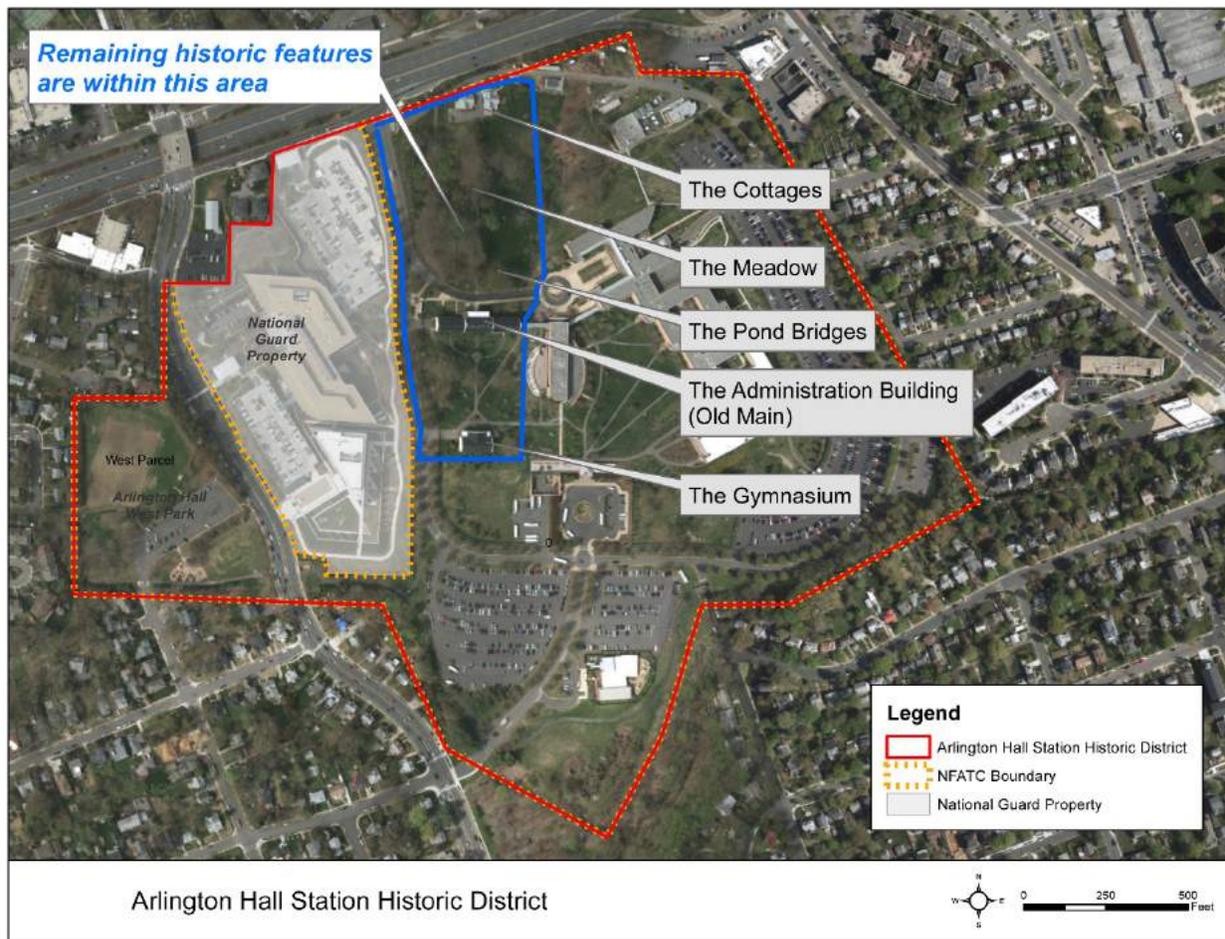


Figure 14: Location of Contributing Features within the Arlington Hall Station Historic District.

The administration building (Old Main) is a four-story buff brick masonry structure designed in an eclectic style, combining Colonial Revival, Adam, and Federal styles and featuring a six-column, three-story central porch (Figure 15). The east annex, constructed a year after the main section, has been demolished. The gymnasium is a two-story, side-gabled structure with an intersecting gabled projection on its primary (north) façade. The gym is constructed of the same buff brick as the administration building and, though much simpler in style, shows similar Colonial Revival influences in its lintels, arched windows, and Palladian-influenced gable windows (Figure 16). The original window openings have been maintained, but the multi-light wood sash windows have been replaced with single-light rectangular aluminum frame windows or arched aluminum frame windows with false muntins in a much simplified pattern. The gymnasium was originally accessed from both its northeast and northwest corners, but the northeast entrance has been removed. The cottages are two Craftsman-influenced buildings that formerly served as housing (Figure 17). The two cottages are similar in design and are 1.5-story, banked, stucco clad, L-plan buildings that feature clipped gables on both the main roof and dormers. Both buildings feature multi-light, double-hung, wood sash windows and enclosed porches with weatherboard siding. The two pond bridges are concrete arch pedestrian bridges with river rock cladding on the spandrel wall and parapet interior. Flat stones, laid in a random pattern, top the parapet walls (Figure 18). The two bridges are located along the main path connecting the cottages with the administration building. Each bridge crosses a tributary of Doctors Branch (the pond appears to

have been removed after the government purchased the property in 1942). The stone cladding is not present on early photos of the bridges and they appear to have originally had a smooth, light colored (or natural concrete) finish. The meadow is comprised of the landscaped area between the administration building and the two cottages (Figures 19-22). The gently rolling terrain drops in elevation as one moves north from the administration building and south from the cottages. The meadow areas contain mature trees, historic-age paths, and memorial benches, as well as a modern paths, benches, and a gazebo. Modern buildings constructed within the historic district boundary since 1990 include: Building A (visitor center), Building C (cafeteria and classrooms), Building F (offices, classrooms, and department suites), Building G (chiller plant), Building J (facility management), Building K (offices, classrooms, and department suites), and Building L (childcare center).



Figure 15: Former Administration Building (present Building E), north façade facing southwest.



Figure 16: Former Gymnasium (present Building D), east (side) and north (front) facades, facing southwest.



Figure 17: Cottages (present Buildings H, at right, and I, at left), east (side) and north (front) facades, facing southwest.



Figure 18: Northern “pond” bridge, east (side) elevation, facing west.



Figure 19: Looking southwest across the meadow from Building I (cottage) toward Building E (former Administration Building).



Figure 20: View looking south across meadow from northern “pond” bridge toward Building E (former Administration Building).



Figure 21: View looking south across meadow from a point just west of Building H (cottage), showing unpaved path.



Figure 22: Class of 1940 memorial concrete bench located in the meadow.

Significance of Historic Property

The Arlington Hall Station Historic District was determined eligible for listing in the NRHP by the Keeper of the National Register on October 7, 1988. Arlington Hall Station is eligible for the NRHP as a historic district for its local architectural and educational importance and for its nationally significant role in American military intelligence operations during World War II. Contributing features of the historic district include all buildings, structures, and landscape features constructed prior to 1946, including all temporary, semi-permanent, and permanent World War II buildings.

Arlington Hall is important for two distinct periods of significance. As the home of Arlington [Hall] Junior College between 1924 and 1942, it is important under National Register Criterion C for its early twentieth century Colonial Revival style institutional architecture and landscape features. Arlington Hall [Junior] College is historically significant under National Register Criterion A in the development of education in Northern Virginia. It was the first exclusive girls school of higher education in the region and the only one developed as a college campus.

The historic district is also exceptionally significant under National Register Criterion A as Arlington Hall Station, the home of the United States Signal Intelligence Service during World War II. Significant events occurring at Arlington Hall Station include the breaking of the Japanese diplomatic code, named "Purple," work performed on German codes, and the development of American secret codes during and after World War II.

National Register Boundary of Historic Property

Refer to Figure 14 for the NRHP boundary of the Arlington Hall Station Historic District. The boundaries of the historic district include the entire 86.5 acre parcel shown on the General Site Map dated February 11, 1963.

Relationship of Proposed Action to Historic Property and Assessment of Project Effect

While all of the proposed improvements under Alternative 1 are located within the Arlington Hall Station Historic District, the components of the alternative that are nearest to the historic core of the district (comprised of Buildings D, E, H, and I and the landscaping features between these buildings), are the construction of a new Visitor Center south of the existing Visitor Center (Building A), a new training wing addition north of Building F, an addition to the Chiller Plant (Building G) as needed to supplement campus expansion, and a new training building located south of the existing Gym (Building D). Small-scale security improvements near the historic core include new perimeter fencing and improvements to the Arlington Boulevard Gate (primary entrance) including a new security booth, wedge barriers, bollards, and pedestrian fencing.

While most of the above components will be screened from the historic core by either mature vegetation or existing buildings, the new Visitor Center south of the existing Visitor Center (Building A) and the new training building (Building B) south of the old Gym (Building D) will border the northern boundary of the historic quad formed by the old Gym (Building D) to the south, Old Main (Building E) in the center, and Buildings H and I to the north. The new Visitor Center (south of Building A) will be visually separated from contributing features of the historic district by new Building D and by existing Building C. Building B, as proposed, will be a four- to five-story building. The L-shaped building will be located approximately 64ft from the south façade and approximately 26ft from the east façade of the old Gym (Building D), which is a contributing element of the historic district. Note that the old Gym (Building D) is 245ft from the six-story office tower within National Guard complex (Figure 23). Although larger in overall size than Building D, new Building B is similar in scale to Building D, and the overall heights of the two buildings are nearly the same (Figures 24-26). Although Building B is within close proximity to the historic core of the district, it does not compromise the visual integrity of the space as it does not interrupt the setting between Buildings D and E, from which the district derives part of its significant features. Though presently open space, the area south of Building D does not contribute to the significance of the historic district, as all features dating to the district's period of significance (1924-1946) have been obliterated (compare Figures 27-29).

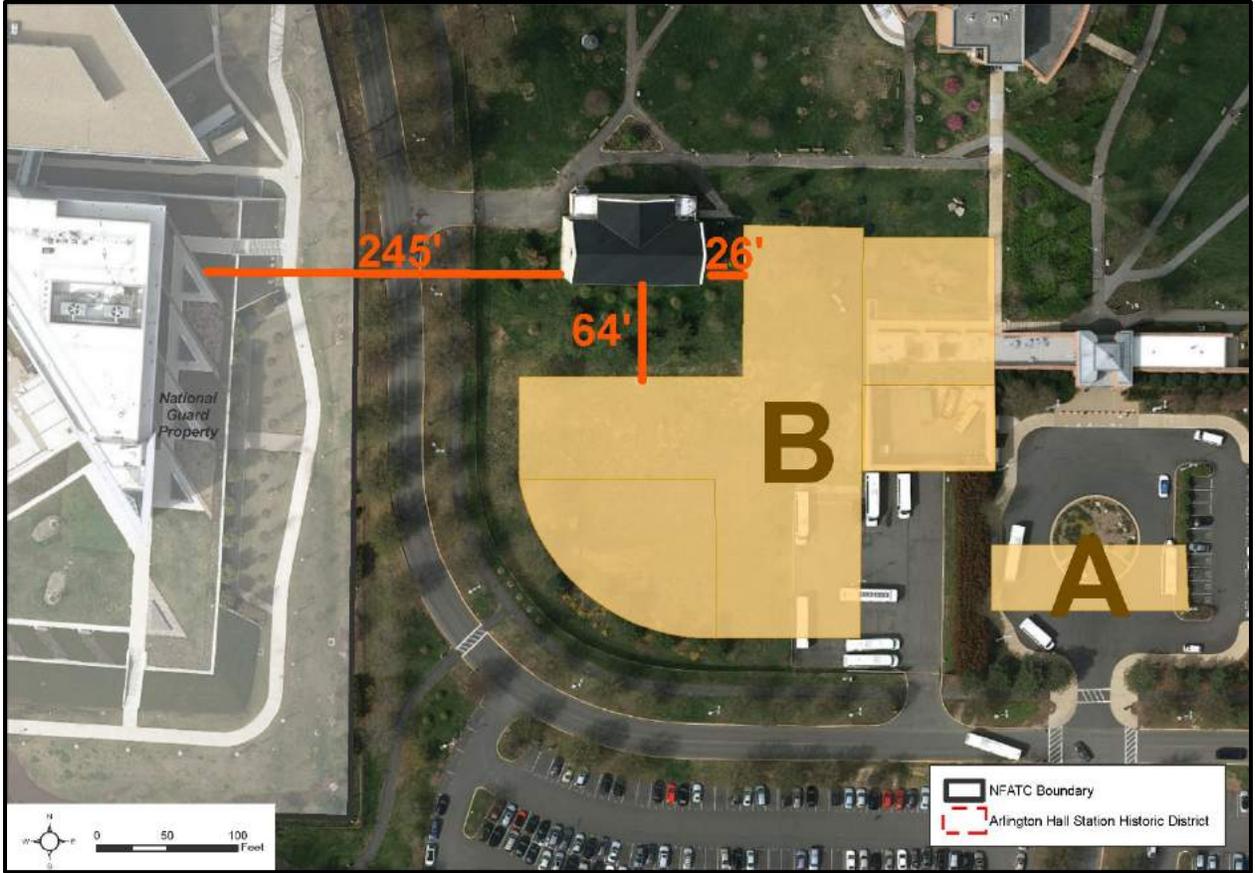


Figure 23: Distance from Building D (former Gym) to proposed Building B.

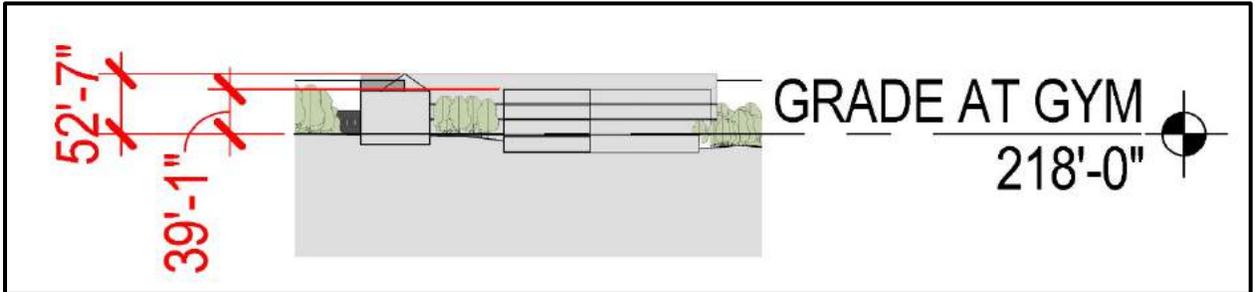


Figure 24: Height comparison of Building D (former Gym), at left, and new Building B, at right. The fourth floor of new Building B will be even in height with the eaves of Building D. The fifth floor of new Building B will be even in height with the ridge line of the roof of Building D.

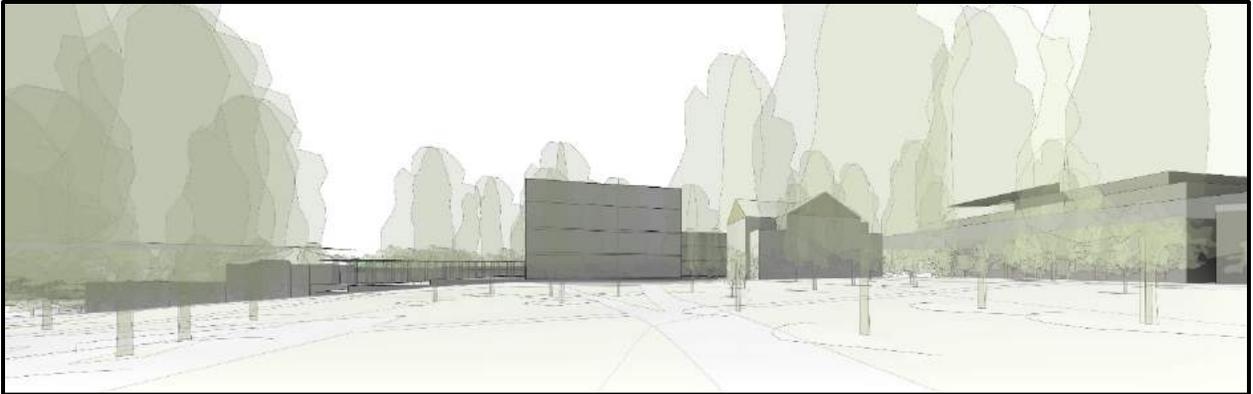


Figure 25: Rendering of new Building B and Building D, showing the comparative massing and scale of the two buildings. View facing southwest from the rear of Building E.



Figure 26: Photo rendering showing scale and massing of new Building B. View south from southeast corner of Building E.

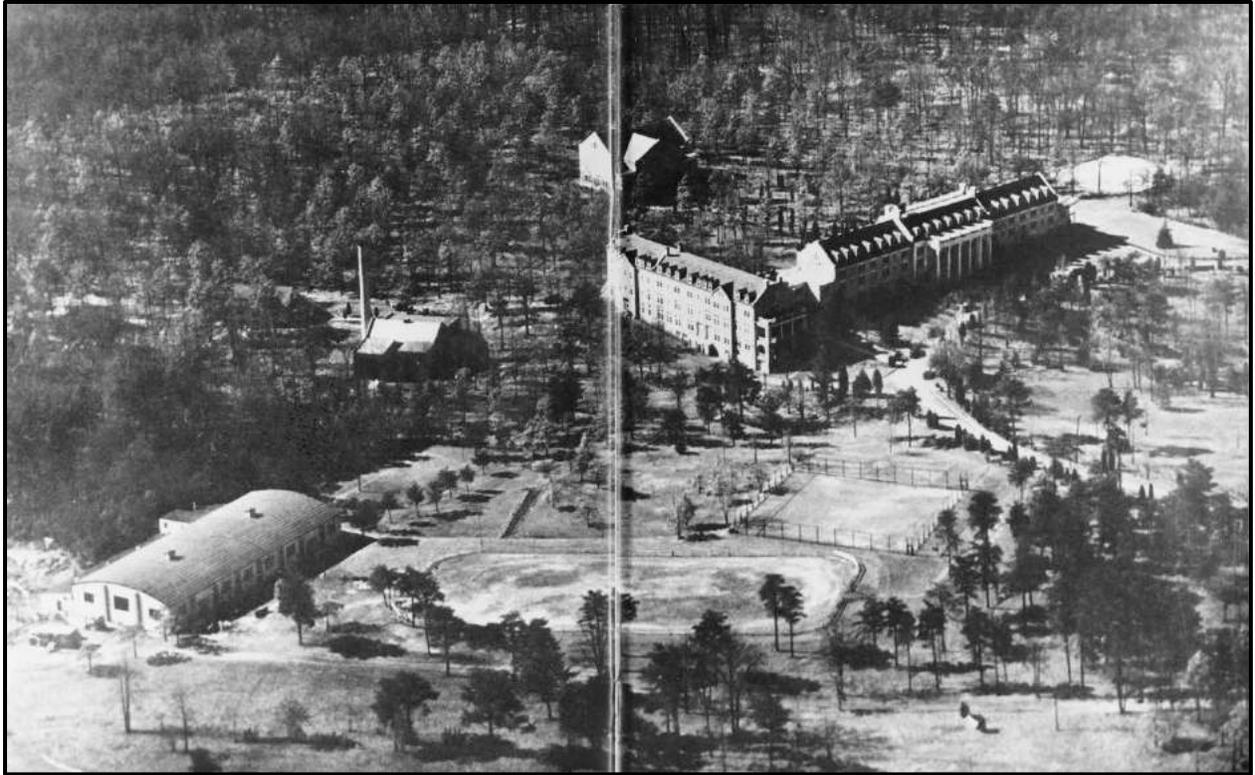


Figure 27: Ca. 1928 aerial photo showing the historic landscape to the north and south of building D (located at upper center of image). Note the semi-wooded quadrangle between Buildings D and E and the wooded character of the land south of Building D. View looking southwest from northeast corner of NFATC property. Photo: HABS/John Milner Associates Inc., 1991.



Figure 28: Mid-1960s aerial showing the ca. 1942 Operations Building (not extant) constructed to the rear of Building D. View facing north from a point near 6th Street S. and S. George Mason Drive. Photo: National Archives and Records Administration, RG 338, Records of the U.S. Army Operational, Tactical, and Support Organizations (World War II and Thereafter), 1917-1999. Maps and Plans for Arlington Hall Station, 1978-1984.



Figure 29: May 13, 1991, aerial view of south part of NFATC campus, showing extensive demolition and loss of historic integrity that occurred south of Building D when the NFATC facility was developed after the transfer of the property from the U.S. Army. Photo: Collection of NFATC.

Table 2: Results of Effect Evaluation for the Arlington Hall Station Historic District under Alternative 1.

DEFINITION OF EFFECT	EVALUATION
An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP as defined in Section 800.16(i).	Alternative 1 of the NFATC Master Plan Update will affect the district through the construction of additions to existing buildings, the construction of a new building south of the old Gym (Building D) and a new building south of the Visitor Center (Building A), and changes to perimeter fencing and access points.
FINDING:	<i>Historic Property Affected</i>

Table 3: Results of Application of the Criteria of Adverse Effect for the Arlington Hall Station Historic District under Alternative 1.

CRITERIA OF ADVERSE EFFECT	
An adverse effect is found when an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.	
Examples of Adverse Effects, pursuant to Section 800.5(a)(2)	Evaluation
Adverse effects on historic properties include, but are not limited to:	
(i) Physical destruction of or damage to all or part of the property;	Implementation of Alternative 1 will not result in the physical destruction or damage to any of the contributing buildings within the historic district.
(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines;	None of the contributing buildings within the district will be altered.
(iii) Removal of the property from its historic location;	None of the contributing buildings will be moved during the implementation of Alternative 1.
(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;	NFATC's use of the property does not contribute to its historic significance. None of the physical features within the historic district that contribute to its historic significance will be changed by the implementation of Alternative 1.

CRITERIA OF ADVERSE EFFECT	
(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;	While Alternative 1 will not introduce atmospheric or audible elements into the historic district, the construction of various additions to existing non-contributing buildings and the construction of a new buildings south of the old Gym building and south of the Visitor Center will introduce visual elements within the district. The existing visual integrity of the district, however, has been largely compromised by the construction of the National Guard complex including its seven-story office tower, as well as by the demolition of all contributing buildings south and east of Building D ca. 1991. The district's historic features, which consist of Old Main (Building E), the old Gym building (Building D), and two cottages (Buildings H and I) and the spatial relationship and landscaping between these elements will remain intact and undisturbed with the implementation of Alternative 1.
(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and	Implementation of Alternative 1 will not cause neglect of the property.
(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.	The property will not be transferred, leased, or sold out of Federal ownership.
OTHER:	
FINDING: Alternative 1 of the NFATC Master Plan Update results in a finding of <i>No Historic Properties Adversely Affected for the Arlington Hall Station Historic District.</i>	

BARCROFT HISTORIC DISTRICT

Description of Historic Property

The Barcroft Historic District is a residential district that is roughly bounded by Columbia Pike to the south, Glencarlyn Park to the west, Arlington Boulevard to the north, and S. George Mason Drive to the east. The district is made up of 1,254 housing units with commercial businesses located primarily along Columbia Pike and a few religious properties and civic institutions found throughout the center of the district. Surrounded by major routes and parks, Barcroft is compact residential community with landscaped streets and parks, rectangular housing lots, free-standing and paired single-family dwellings, and a commercial corridor. The dwellings, constructed both of wood frame and masonry, are set back from the road with sidewalks and yards buffering them from the public rights-of-way. Most of these dwellings date from the early twentieth century, displaying the fashionable architectural styles of the period in which they were constructed. The dominant forms and styles, albeit diluted, include Gothic Revival, Queen Anne, Colonial Revival, Bungalow/Craftsman, Cape Cods, and pre-fabricated kit-houses. The portion of the historic district within the APE contains predominantly 1930-1940s era Cape Cod dwellings, some with Colonial Revival stylistic influences, which are situated along an arterial thoroughfare, S. George Mason Drive, on the east edge of the district (Figures 30-31)



Figure 30: Overview of the portion of the Barcroft Historic District within the APE. View facing north from the west side of S. George Mason Drive at 6th Street S.



Figure 31: Typical houses in the portion of the district within the APE. View of 409 (at left) and 413 (at right) S. George Mason Drive, facing NE toward the NFATC property.

Significance of Historic Property

The Barcroft Historic District is significant as an early suburb of Washington, D.C. The growth of the community is primarily tied to the arrival of the commuter railroads in the late nineteenth century. Architecturally, the community features a number of late nineteenth and early twentieth century buildings that reflect the fashionable styles and building forms of the period. Surrounded now by its major transportation and commercial corridors and Glencarlyn Park, Barcroft retains a substantial number of late-nineteenth century dwellings, the majority reflecting the Queen Anne style.

National Register Boundary of Historic Property

The NRHP boundary of the Barcroft Historic District is depicted in Figure 32.



Figure 32: NRHP Boundary of Barcroft Historic District shown in relation to the historic resources APE.

Relationship of Proposed Action to Historic Property and Assessment of Project Effect

In the area of the Barcroft Historic District, the nearest of the components comprising Alternative 1 of the NFATC Master Plan Update include a new training building (Building B) to be located south of the existing Gym (Building D), an addition to the south and west sides of the Childcare Center (Building L), and small scale security features including new perimeter fencing and new 8ft gates, bollards, and pedestrian fencing at the S. George Mason Drive Gate (secondary entrance). The construction of Building B has the most potential of all of the improvements to be visually evident from the historic district. Building B, as proposed, is to be a four- to five-story building. The closest contributing house within the Barcroft Historic District is approximately 450ft southwest of Building B; the closest historic district boundary is approximately 350ft southwest from the proposed location of Building B. Given the distance from Building B to the district and the presence of an existing vegetative screening of mature trees, the visibility of the proposed building will be minimal. Further, the view-shed from the district to the east is largely obscured by the existing National Guard complex and its seven-story office tower. The addition to the south and west sides of the Child Care Facility (Building L) will be minimally visible from the district. Finally, the small-scale security elements will be minimally visible from the eastern edge of the district. The existing perimeter fencing will be replaced with new perimeter fencing. Improvements at the S. George Mason Drive Gate, including 8ft gates, bollards, and pedestrian fencing will be recessed approximately 100ft from S. George Mason Drive, and improvements at the West Parcel Pedestrian Underpass include such small-scale elements as a new turnstile, new anti-climb fencing, and a new accessible sidewalk to S. George Mason Drive. The potential for visible impacts to the historic district resulting from these elements is negligible.

Table 4: Results of Effect Evaluation for the Barcroft Historic District under Alternative 1.

DEFINITION OF EFFECT	EVALUATION
An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP as defined in Section 800.16(i).	Alternative 1 of the NFATC 2016 Master Plan Update has the potential to affect the Barcroft Historic District by introducing new visual elements, including the construction of additions to existing buildings, the addition of two new buildings, and changes to perimeter fencing, into the external setting of the district.
FINDING:	<i>Historic Property Affected</i>

Table 5: Results of Application of the Criteria of Adverse Effect for the Barcroft Historic District under Alternative 1.

CRITERIA OF ADVERSE EFFECT	
An adverse effect is found when an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.	
Examples of Adverse Effects, pursuant to Section 800.5(a)(2)	Evaluation
Adverse effects on historic properties include, but are not limited to:	
(i) Physical destruction of or damage to all or part of the property;	The implementation of Alternative 1 will not physically extend beyond the present property boundaries of the NFATC. It will not result in the physical destruction or damage to any part of the Barcroft Historic District.
(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines;	The implementation of Alternative 1 will not physically extend beyond the present property boundaries of the NFATC. It will not result in the alteration of any properties within the Barcroft Historic District.
(iii) Removal of the property from its historic location;	The implementation of Alternative 1 will not remove any properties within the Barcroft Historic District from their historic locations.
(iv) Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;	The implementation of Alternative 1 will not change the use of the properties within the Barcroft Historic District. The district is a

CRITERIA OF ADVERSE EFFECT	
	residential area and is zoned accordingly. No physical features within the historic district will be altered and minimally-visible changes outside of the district on the NFATC campus will not compromise the external setting of the district.
(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;	Alternative 1 will not introduce atmospheric or audible elements into the historic district as evidenced by the transportation study conducted as part of the master plan update. Alternative 1 will introduce minor visual elements to the district through the construction of additions to existing buildings, changes to perimeter fencing, and the construction of two new buildings on the NFATC parcel. These proposed changes will be minimally visible from a few individual properties bordering the NFATC parcel, but those components will be largely undistinguishable considering distance, extant vegetative screening surrounding the parcel, and the National Guard complex and its seven-story office tower that provides a visual separation from the proposed improvements within the NFATC property.
(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and	The implementation of Alternative 1 will not result in the neglect of properties within the Barcroft Historic District. The continued investment in the NFATC property should serve to maintain property values within the surrounding neighborhoods.
(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.	The Barcroft Historic District is not under Federal ownership or control.
OTHER:	
FINDING: Alternative 1 of the NFATC Master Plan Update results in a finding of <i>No Historic Properties Adversely Affected for the Barcroft Historic District.</i>	

ALCOVA HEIGHTS HISTORIC DISTRICT

Description of Historic Property

The Alcova Heights Historic District is residential district that is roughly bounded by Columbia Pike to the south, Alcova Heights Park, S. Randolph Street, and the NFATC campus to the west, Arlington Boulevard to the north, and S. Glebe Road to the east. The district is predominately made up of housing units and a few religious properties and civic institutions. The district's four churches are generally located in the southeast part of the district. Two mid-rise apartment buildings dating to 1958 (known historically as the Shenandoah Apartments) are located in the north part of the district at 6th Street S. near S. Glebe

Road, and adjacent to these apartments are a large Salvation Army Corps complex (ca. 1967) and a modern fire station. Outside of and adjacent to the proposed historic district are number of commercial buildings on Columbia Pike, which generally date to the 1960s and later. Also excluded from the district are a ca. 1985 multi-family housing complex, Dundree Knolls, located on Columbia Pike between S. Oakland and S. Quincy streets and a more recent townhouse complex located on Columbia Pike between S. Quincy and S. Randolph streets.

Surrounded by arterial roads, a government facility (NFATC), and a park, Alcova Heights is compact residential community with landscaped rectilinear but irregular streets. The irregular block length creates some blocks with extremely deep rear yards, such as the block bounded by S. Quincy and S. Oakland streets between 9th Street S. and 8th Street S. No streets have alleys to access the rear of properties. House lots are typically rectangular with single-family dwellings set back from the road with sidewalks and yards buffering them from the public rights-of-way. Dwellings are constructed of wood frame and masonry, and most date from the 1920s to the 1960s, displaying the fashionable architectural styles of the period in which they were constructed. The dominant forms and styles include Colonial Revival, Tudor Revival, Bungalow/Craftsman, Cape Cods, and Ranches. This district also contains a farmhouse, “Alcova,” which was originally known as Springhill Farm and whose associated land (totaling more than 100 acres) was subdivided ca. 1921 for development of the Alcova Heights neighborhood. Alcova, located at 3435 8th Street S., was designated a local district on October 3, 1978, but the property (DHR #000-2017) has not been formally evaluated for NRHP-eligibility. The portion of the historic district within the APE contains predominantly 1930-1950s era Cape Cod or Minimal Traditional dwellings, some with Colonial Revival stylistic influences, which are situated along 6th, 3rd, 2nd, and 1st streets S (Figure 33).



Figure 33: Character of typical housing in the portion of the Alcova Heights Historic District within the APE. View along 3rd Street S. looking west-southwest from S. Glebe Road. The NFATC Campus is located behind the trees at the end of the block.

Significance of Historic Property

Alcova Heights was given its name by real estate developer and Virginia State Senator Joseph Cloyd Byars, owner of Springhill Farm between 1915 and 1932, whose original land holdings encompassed much of the present Alcova Heights Neighborhood. Byars renamed the farm Alcova for Alexandria County Virginia (note that Alexandria County was renamed Arlington County in 1920 in order to minimize confusion with the independent City of Alexandria). In 1921, Byars bought 142 acres from the Columbia Land Company and sold the lots for 5 cents a square foot. Byars laid out many streets, naming them Azalea Street (S. Quincy Street), Marconi Avenue (8th Street S.), Deepwood Avenue (9th Street S.), Springhill Street (S. Lincoln Street), Virginia Street (S. Monroe Street), and Linden Avenue (S. Oakland Street). By the time that Byars began developing the neighborhood, the population of Arlington County was rapidly increasing. Alcova Heights was an accessible to the greater Washington D.C. area via a trolley line located less than a mile from “Hunter’s Crossroads” (the intersection of S. Glebe Road and Columbia Pike), as well as by bus lines that ran along Columbia Pike and Lee Boulevard (present Arlington Boulevard), which was widened to 200ft in 1925. The construction of water and sewer service to the area in 1928 further stimulated development, as did the availability of nearby federal government jobs at Washington, D.C., Forts Myer and Belvoir, and at the Pentagon (constructed 1941-42). Many of the area’s residents came to fill defense-related jobs in the period following World War I and during World War II. The population of Arlington County grew from 26,615 to 120,000 between 1930 and 1944, which also corresponds with the most intense period of construction in the Alcova Heights Neighborhood.

The Alcova Heights Historic District is significant under NRHP Criterion A in the area of planning and development, as it reflects the trend of early suburban growth in Arlington County. The district is also significant under Criterion C as it contains representative examples of historic revival (particularly Colonial Revival) and Minimal Traditional styles that were popular from the 1920s through the 1950s. The neighborhood also exemplifies a specific type of housing that was developed for white collar, lower-middle, and middle class workers, which was produced by mass production, standardization, and prefabrication.

National Register Boundary of Historic Property

The proposed boundary of the Alcova Heights Historic District contains 129 acres and is depicted in Figure 34).



Figure 34: NRHP Boundary of the Alcova Heights Historic District shown in relation to the historic resources APE.

Relationship of Proposed Action to Historic Property and Assessment of Project Effect

In the area of the Alcova Heights Historic District, the nearest of the components comprising Alternative 1 of the NFATC Master Plan Update include a new training building (Building B) to be located south of the existing Gym (Building D), a new Visitor Center south of the existing Visitor Center (Building A), an addition to the south and west sides of the Childcare Center (Building L), a new training wing addition north of Building F, an addition to the Chiller Plant (Building G), as needed, to supplement campus expansion, an addition to the southwest side of Building K, and small scale security features including new perimeter fencing and improvements to the S. Quincy Street gate including a new double-swing gate, anti-ram fencing, boulders, and a 6ft earth berm. The nearest large-scale feature of Alternative 1 to the boundaries of the historic district is the addition to the south and west sides of the Childcare Center (Building L). Here, a one-story addition will be appended to the south and west façades of the existing building, approximately 210ft west of the district boundary. The low-rise building has little potential to create a visual impact to the historic district because of both distance and extant vegetative screening. The other large-scale feature that could pose a visual impact to the historic district is the construction of a two-story addition to the southwest side of Building K. The addition to Building K, would be approximately 400ft to the nearest boundary of the historic district and is separated by a large surface parking lot and a line vegetative screening along the property's perimeter. The potential for visual impacts to the historic district resulting from the construction of this addition is minimal, especially considering the fact that the addition will be one story shorter than the existing three-story Building K. Finally, the small-scale security elements will be minimally visible from the eastern edge of the district. The existing perimeter fencing will be replaced with new perimeter fencing. Improvements at the S. Quincy Street gate will be made at or very near the boundary of the historic district. The

improvements consist of a new double-swing gate, similar to the existing gate, and anti-ram fencing. Landscaping features such as boulders and a 6ft earth berm will soften the visibility of the fencing and gate components.

Table 6: Results of Effect Evaluation for the Alcova Heights Historic District under Alternative 1.

DEFINITION OF EFFECT	EVALUATION
An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP as defined in Section 800.16(i).	Alternative 1 of the NFATC Master Plan Update has the potential to affect the Alcova Heights Historic District by introducing new visual elements, including the construction of additions to existing buildings, the addition of two new buildings, and changes to perimeter fencing, into the external setting of the district.
FINDING:	<i>Historic Property Affected</i>

Table 7: Results of Application of the Criteria of Adverse Effect for the Alcova Heights Historic District under Alternative 1.

CRITERIA OF ADVERSE EFFECT	
An adverse effect is found when an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.	
Examples of Adverse Effects, pursuant to Section 800.5(a)(2)	Evaluation
Adverse effects on historic properties include, but are not limited to:	
(i) Physical destruction of or damage to all or part of the property;	The implementation of Alternative 1 will not physically extend beyond the present property boundaries of the NFATC. It will not result in the physical destruction or damage to any part of the Alcova Heights Historic District.
(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines;	The implementation of Alternative 1 will not physically extend beyond the present property boundaries of the NFATC. It will not result in the alteration of any properties within the Alcova Heights Historic District.
(iii) Removal of the property from its historic	The implementation of Alternative 1 will not

CRITERIA OF ADVERSE EFFECT	
location;	remove any properties within the Alcova Heights Historic District from their historic locations.
(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;	The implementation of Alternative 1 will not change the use of the properties within the Alcova Heights Historic District. The district is a residential area and is zoned accordingly. No physical features within the historic district will be altered and minimally-visible changes outside of the district on the NFATC campus will not compromise the external setting of the district.
(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;	Alternative 1 will not introduce atmospheric or audible elements into the historic district as evidenced by the transportation study conducted as part of the master plan update. Alternative 1 will introduce minor visual elements to the district through the construction of additions to existing buildings, changes to perimeter fencing, and the construction of two new buildings on the parcel. These proposed changes will be minimally visible from a few individual properties bordering the NFATC parcel, but those components will be largely undistinguishable considering distance and extant vegetative screening surrounding the parcel.
(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and	The implementation of Alternative 1 will not result in the neglect of properties within the Alcova Heights Historic District. The continued investment in the NFATC property should serve to maintain property values within the surrounding neighborhoods.
(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.	The Alcova Heights Historic District is not under Federal ownership or control.
OTHER:	
FINDING: Alternative 1 of the NFATC Master Plan Update results in a finding of <i>No Historic Properties Adversely Affected for the Alcova Heights Historic District.</i>	

SUMMARY AND RECOMMENDATIONS

This Determination of Effect Memorandum describes the evaluation of potential effects of activities proposed in the NFATC Master Plan Update to historic properties located within the project APE. Application of the Criteria of Adverse Effect indicates that implementation of the updated NFATC Master Plan will have a finding of no adverse effect upon the Arlington Hall Station Historic District, Barcroft Historic District, and the Alcova Heights Historic District under the Proposed Alternative 1 (Table 8).

Table 8: Summary of Project Effects

Historic Property	Proposed Alternative (1)
Arlington Hall Station Historic District	No Adverse Effect
Barcroft Historic District	No Adverse Effect
Alcova Heights Historic District	No Adverse Effect

REFERENCES

Browne, Eichman, Dalglish, Gilpin and Paxton, P.C.

1988 *Arlington Hall Station Historic Resources Assessment, Volumes 1 and 2*. Prepared by Browne, Eichman, Dalglish, Gilpin and Paxton, P.C., Architects, Charlottesville, Virginia.

John Milner Associates, Inc.

1989 *Historic American Buildings Survey: Arlington Hall Station, Arlington, Virginia*. Submitted to Sasaki-Mitchell/Giurgola Joint Venture, Washington, D.C. Prepared by John Milner Associates, Inc. Philadelphia, Pennsylvania.

Metcalf and Associates

1988 *Environmental Assessment: National Guard Consolidation to Arlington Hall*. Prepared for National Guard Bureau by Metcalf and Associates, Architects-Planners with Lawrence and Lawrence, P.C.

United States Geological Survey (USGS)

2013 *Alexandria, Virginia-District of Columbia-Maryland 7.5-minute quadrangle*.

QUALIFICATIONS OF PREPARERS

Jesse A. Belfast *Architectural Historian*

Mr. Belfast, M.A. is an architectural historian and historian with over 12 years of experience in numerous aspects of Section 106 compliance, including National Register of Historic Places nominations, historic structure surveys, state inventory form preparation, criteria of effects evaluations, MOA/MOU preparation, programmatic agreement preparation, public involvement coordination, archival records research, deed research, and HABS/HAER documentation.

Timothy G. Zinn *Architectural Historian*

Mr. Zinn is a historic preservation specialist and architectural historian manager for the Pittsburgh office. He has over 20 years of experience in the Mid-Atlantic region, serving as both principal investigator and project/task manager for numerous historic resources projects in multiple states, including Historic Resources Surveys, Determination of Eligibility studies, Determination of Effect findings, Memorandum of Agreement preparation, National Register of Historic Places nominations, Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation, and State Historic Resources surveys.

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**PRIOR SECTION 106 COORDINATION FOR 2005 MASTER PLAN UPDATE AND
EA/FONSI**



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
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January 25, 2017

Nancy Witherell
Regional Historic Preservation Officer
U.S. General Services Administration
National Capital Region
Attention: Ms. Alexis Gray, Project Manager
301 7th Street, SW, Room 4004
Washington, D.C. 20407

Re: Environmental Assessment
George P. Shultz National Foreign Affairs Security Training Center (NFATC) Master Plan Update
Arlington, Virginia
DHR File No. 2016-0732

Dear Ms. Witherell:

Thank you for your letter of December 13, 2016 providing the Department of Historic Resources with a revised Area of Potential Effects (APE) and determination of effects. We also appreciate receiving the supporting documentation on January 11, 2017, including the *Revision of the Area of Potential Effects and Determination of Effects (APE Revision)*. I regret to inform you that we cannot agree that a determination of effects is possible at this time.

In the preliminary assessment, GSA applied the Criteria of Adverse Effects to the 2016 NFATC Master Plan Update, per 36 CFR 800.5(a)(1), and then determined that the various components of the Proposed Action are compatible with the architecture of contributing historic features in the Arlington Hall Station Historic District, and if implemented, would have no adverse effect on the overall character of the setting and views within the historic district. In the subsequent *APE Revision*, GSA determined that there would be no adverse effect to Arlington Hall Station Historic District, Barcroft Historic District or Alcova Heights Historic District. Based upon a review of all information provided, we do not concur that the proposed project will not adversely affect historic resources. It is the opinion of DHR that GSA has not submitted sufficient information to make a final effect recommendation or determine the APE.

A programmatic agreement may be used when effects on historic properties cannot be fully determined prior to approval of an undertaking and we agreed with Gary Porter of the General Services Administration (GSA) on September 27, 2016 that a programmatic agreement is appropriate here. As stated in Section 3.8.2 of the Environmental Assessment, Archeological Resources, *Because construction of the various buildings and*

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improvements under the Proposed Action would be phased over time, a Programmatic Agreement between GSA, DOS, FSI, and other consulting parties is currently being developed. The Programmatic Agreement will establish the protocol for continuing the Section 106 process as construction plans for the Proposed Action advances.

Description of APE. As you know, in 1988, the Arlington Hall Station Historic District (DHR ID #000-0018) was determined eligible by the Keeper of the National Register for listing in the National Register of Historic Places (NRHP). In a Determination of Eligibility Notification dated 10/7/88, Arlington Hall Station was determined eligible as a historic district for its local architectural and educational importance and for its nationally significant role in American military intelligence operations during World War II. Contributing features included all buildings, structures and landscape features constructed before 1946, including all temporary, semi-permanent and permanent World War II buildings. The boundary includes the entire 86.5 acre parcel as shown on the 1963 general Site Map. The two periods of significance are: from 1924 to 1942 as the Arlington Junior College because it was the first girls school of higher education in the region and the only one developed as a college campus; and from 1942 to 1946 as the home of the United States Signal Intelligence Service during World War II.

On July 21, 2015, Michael Baker sent a letter to DHR on behalf of the General Services Administration (GSA) regarding the Master Planning Process and proposed reducing the boundary of the district due to significant loss of integrity (DHR File No. 2015-0667). The proposed boundary was drawn to include the four remaining pre-1946 buildings (Buildings: D-Gymnasium, E-Old Main Building H-Cottage 50, and I-Cottage 51) and related landscape features, while excluding late 20th and 21st century buildings and surface parking areas. On August 6, 2015 DHR responded to GSA.

Redrawing boundaries for an eligible district is not appropriate prior to initiation of Section 106. Furthermore, the information provided for our concurrence of a reduction in boundaries for this NRHP-eligible site is insufficient. Has survey been conducted of the site to justify the boundary reduction? A field view and review of archival materials is not sufficient. The information provided by your consultant Michael Baker International is very brief, and seems to imply that a larger project will occur at this site.

Based upon a review of the information provided, we do not concur at this time that the boundaries for NRHP-eligible Arlington Hall Historic District should be reduced. We recommend initiating Section 106 [including a project review application to our office], identifying consulting parties, delineating an Area of Potential Effects (APE) with justification, and then move on to identification of historic properties where the boundaries of the Arlington Hall Historic District are best addressed through cultural resources survey. At this time, we prefer to refrain from commenting on archaeology until Section 106 is initiated and an undertaking is described.

The last communication regarding the boundary reduction was sent as a response from GSA's Gary Porter on August 20, 2015, informing DHR that he would coordinate with the Department of State on the 106 initiation process regarding this.

DHR recommends a cultural resources survey for the Arlington Hall Historic District. The demolition of the Operations B building (a contributing resource to the historic district), which occurred between 1988 and 1991, and the transfer of the accompanying property to the National Guard Bureau, should be reflected in a revised historic district boundary. GSA should continue to pursue the boundary reduction as part of the current Section 106 consultation.

In our opinion a viewshed analysis will be needed to determine the APE for visual effects. Neither the Massing Plan, nor other justifications presented in the EA, or *APE Revision*, is sufficient in place of a viewshed analysis. Before the APE can be determined with certainty, a thorough viewshed study will need to be conducted. We encourage you to consider DHR's *Assessing Visual Effects on Historic Properties* (2010) which gives guidance on establishing a viewshed and viewshed study methodology. This is available on our website at http://www.dhr.virginia.gov/pdf_files/Assessing_Visual_Effects_JUN10.pdf.

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One popular method is to conduct a “red balloon test,” which consists of raising a highly-visible helium-filled balloon on a tether to the height of the proposed facility and driving around the area to determine from where the balloon can be seen. Those areas from which the balloon can be seen are considered the viewshed. Another more advanced method of determining viewshed involves the use of geographical information systems (GIS), where based upon topography, relative elevation, and vegetative cover, a virtual viewshed is constructed. In using GIS modeling, field verification may be necessary to refine the viewshed.

The following viewshed studies are necessary to determine effects on historic resources:

1. Barcroft Historic District: While it is clear that a portion of the Barcroft Historic District will not be visually impacted due to the National Guard complex blocking the view to NFATC, a viewshed analysis is needed for the portions that are not blocked by the National Guard complex.
2. Alcova Heights Historic District

The Barcroft Historic District was determined eligible by the DHR Evaluation Committee in 2001 as locally significant under Criteria A (Community Planning/Development) and C (Architecture). The EA should clearly state, as implied in your December 13, 2016 letter, that GSA will consider the Alcova Heights neighborhood as NRHP-eligible for the purposes of this undertaking.

The *Draft EA* also notes vegetative screening as one of the reasons the new building’s visual intrusion will not negatively impact historic resources. It is not stated what kind of vegetative screening will be used and if it will be affected by the season, such as would be the case with deciduous plants. Please provide the type(s) of plants that will be used for the aforementioned screening and consider seasonal visibility in your viewshed study.

Furthermore, neither the *Draft EA* nor the *APE Revision*, make clear if the historic meadow and pond bridges retain enough integrity to be significant or if they will be retained or altered. This should be specified.

Lastly, it should be noted that one reason that the Arlington Hall Station Historic District is NRHP-eligible is for its early 20th-century Colonial Revival style institutional architecture. Therefore, the design details of the proposed new buildings should be contemporary and compatible. DHR will need to review the design details (i.e. elevations, renderings, sections and spec sheets) in order to concur with GSA’s final effect recommendation, unless a decision is made to include this review in the programmatic agreement.

Identification of Consulting Parties and Scope of Public Involvement. We appreciate your notification of the Delaware Nation, the Delaware Tribe of Indians, the Catawba Nation and the Pamunkey Tribe as well as sharing the response of the Catawba Nation and the Pamunkey Tribe with DHR.

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for archaeology) at (804)482-6088; e-mail ethel.eaton@dhr.virginia.gov, or and Adrienne Birge-Wilson at (804) 482-6092; e-mail adrienne.birge-wilson@dhr.virginia.gov (for architectural issues).

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst
Review and Compliance Division

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February 10, 2017

Mr. Marcel Acosta, Executive Director
National Capital Planning Commission
401 9th Street, NW, North Lobby, Suite 500
Washington, DC 20004

Re: Initiation of Section 106 Review for the Master Plan Update at the George P. Shultz National Foreign Affairs Training Center (NFATC), Arlington County, Virginia

Dear Mr. Acosta:

U.S. General Services Administration (GSA) is writing to invite the National Capital Planning Commission (NCP) to participate as a consulting party under Section 106 of the National Historic Preservation Act (NHPA, pursuant to 36 CFR § 800.2(c), for a proposed update to the Master Plan for the George P. Shultz National Foreign Affairs Training Center (NFATC) at Arlington Hall in Arlington, Virginia (Figure 1). As you know, NFATC is the headquarters for the Foreign Service Institute of the Department of State (DOS). GSA and DOS are co-lead agencies for this undertaking. In addition, GSA, as the federal agency with jurisdiction of the site, is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) of 1969. DOS is a cooperating agency. NEPA requires federal agencies to evaluate the potential impacts that proposed actions may have on the human and natural environment. In accordance with 36 CFR § 800.8, GSA will coordinate the Section 106 review with the NEPA process for this undertaking.

As the attached figures indicate, the NFATC is comprised of two major parcels: a 65-acre main academic campus and a 7-acre west parcel used by DOS for satellite parking and (by memorandum of agreement) with Arlington County as a public park (Figure 2). The area of building on the NFATC campus now totals approximately 623,500 gross square feet (Figure 3). The DOS anticipates the Master Plan update will require phased construction of several new buildings and phased expansions of existing buildings within the historic district campus.

GSA initiated Section 106 consultation with the Virginia Department of Historic Resources (DHR) on June 29, 2016. In our letter we submitted a proposed Area of Potential Effect (APE) limited to the NFATC boundary for both archaeology and visual impacts. DHR concurred with our proposed APE for archaeology, which also comprises the boundary of the Arlington Hall Station Historic District. (The DHR also noted that a Phase I archaeological survey was warranted in four areas of potential new development within the NFATC prior to any ground disturbing activities (Figure 4). It is anticipated that the Phase 1 investigations will be deferred until construction is funded and will be addressed in a Programmatic Agreement.

However, DHR requested that the visual APE be expanded to include areas outside of the NFATC boundary where the proposed new construction might be visible. In response, GSA enlarged the visual APE to include portions of the Barcroft and Alcovia Heights neighborhoods and re-submitted the revised visual APE in a Determination of Effects Memorandum on December 15, 2016.

On January 25, 2017, GSA received comments from the DHR requesting additional information in the form of a view shed analysis before being able to make a determination of effect. In response to the DHR request GSA has developed the view shed analysis from various locations within the Barcroft and Alcovia neighborhoods where the new construction may be visible. In response to comments received from Arlington County, we have also included the Unitarian Universalist Church of Arlington in the APE and view shed analysis.

In addition to the four figures noted above we have enclosed a copy of the DHR response letter from January 25, the revised APE, the view shed analysis and the Effects Memorandum for your review. We are simultaneously submitting the revised APE and view shed analysis to the DHR and will share their comments upon receipt.

Based on the need for future consultation with regard to archaeology, design review and possible mitigation measures GSA anticipates developing a Programmatic Agreement to address these issues. For this reason we will extend an invitation to the Advisory Council on Historic Preservation and will draft a PA once comments are received from the DHR.

In conjunction with this invitation GSA has also extended an invitation to participate as a consulting party to the Arlington Department of Community Planning, Housing and Development, the Arlington Historical Society and the National Guard Bureau. On September 12, 2016, GSA invited the Delaware Nation, the Delaware Tribe, the Pamunkey Tribe, and Catawba Indian Nation to participate in the consultation. None has responded with a request for tribal participation.

If you have any questions regarding the proposed Master Plan Update, please contact Alexis Gray, NEPA Compliance Specialist, alexis.gray@gsa.gov, or Gary Porter, Historic Preservation Specialist, gary.porter@gsa.gov, by email or at the mailing address included on the bottom right corner of the first page of this letter.

Sincerely,



Nancy Witherell
Regional Historic Preservation Officer
National Capital Region

cc: John J. Bernard, Jr., DOS
Ethel Eaton, VA DHR

Attachments, Figures 1-4
VA SHPO Letter
View Shed Analysis
Revised Area of Potential effects

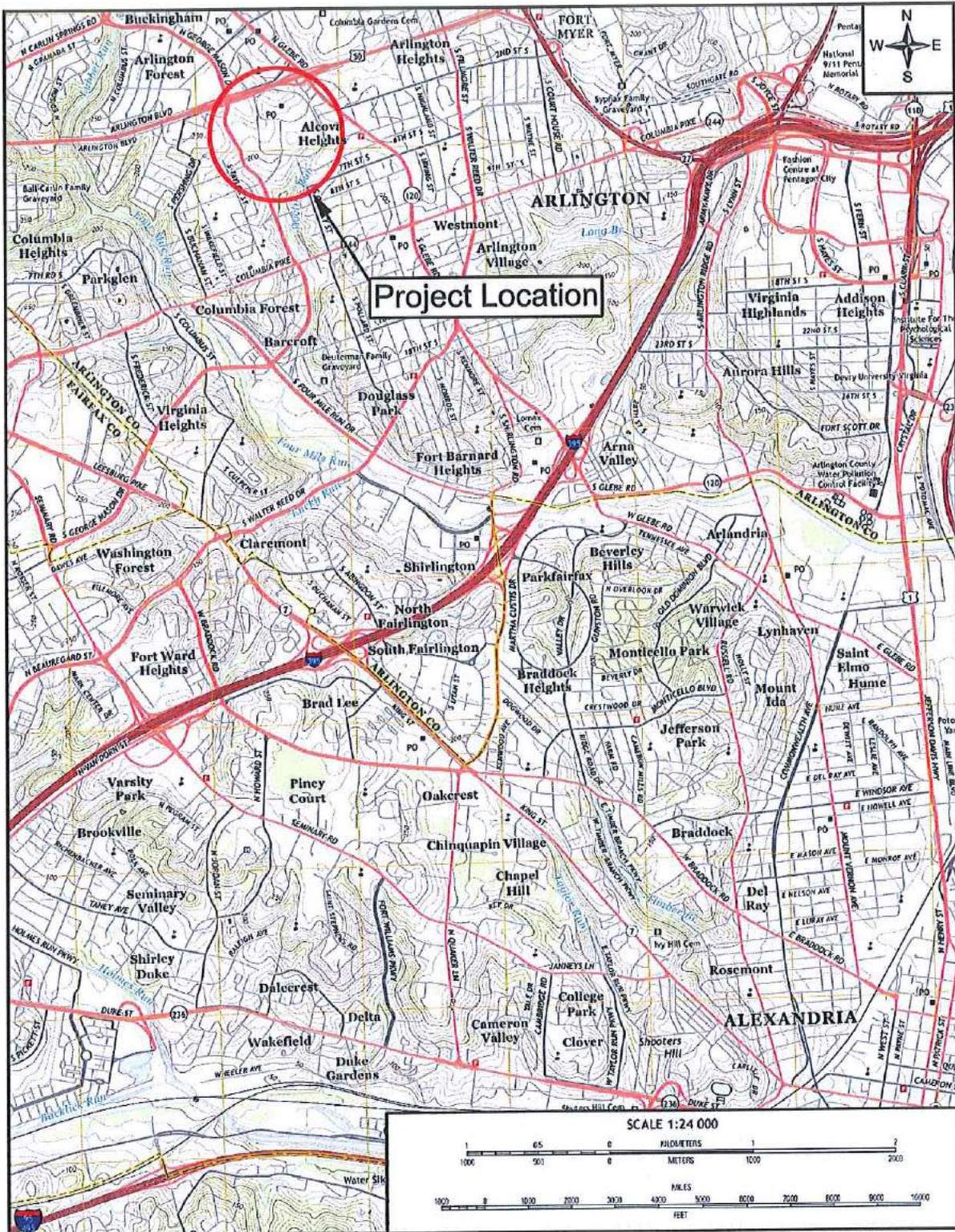


Figure 1: Project location shown on the Alexandria, Virginia 7.5-minute quadrangle (USGS 2013).

Figure 3: Existing Conditions - National Foreign Affairs Training Facility (NFATC)



Building Key	
Blg A - Value Center	3,200 SF, 24x 6,000 Road Corner
Blg B - Caldera 5,214 sq	43,000 SF
Blg C - Gym	12,400 SF
Blg D - Out Yard Building	43,000 SF
Blg E - Classroom and Administration	271,400 SF
Blg F - Central Plant	6,800 SF
Blg G - Central CS	5,200 SF
Blg H - Campus 01	5,200 SF
Blg I - Facility Management Office	6,900 SF
Blg J - Maintenance Building	17,600 SF
Blg K - Children Center	15,600 SF
TOTAL SF	107K



NFATC

1" = 300'-0"

3234-002-14

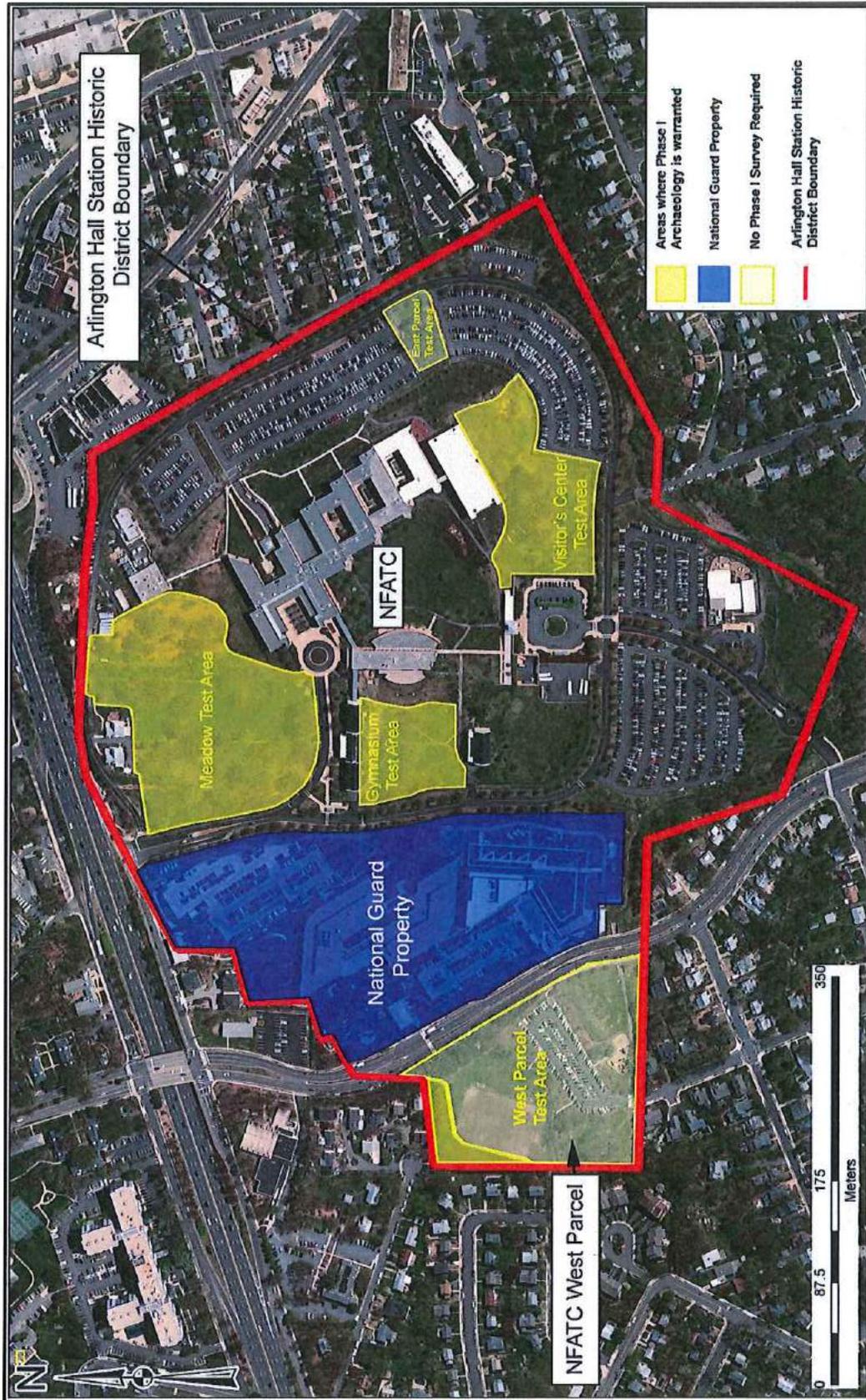


Figure 4: Areas recommended for Phase 1 archaeological survey.



GSA National Capital Region
Office of Planning & Design Quality

February 10, 2017

Dr. Ethel R. Eaton, Ph.D., Senior Policy Analyst
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

George P. Schultz National Foreign Affairs Security Training Center (NFATC) Master Plan Update
Arlington, VA
DHR File No. 2016-0732

Dear Dr. Eaton:

Thank you for your letter of January 25, 2017, in response to our submission of the revised Area of Potential Effect (APE) and associated Memorandum of Effects for the proposed building program at the NFATC. In response to your request for a view shed analysis to facilitate your review and determination of effects of new construction on the Arlington Hall Station, Alcova Heights and Barcroft Historic Districts, as well as the Unitarian Universalist Church of Arlington, GSA would like to take this opportunity to submit the enclosed view shed analysis.

The methodology used for the view shed analysis is intended to verify the boundary of the APE and illustrate the extent of visibility of the proposed building program from within the NFATC and the adjacent historic Alcova Heights and Barcroft neighborhoods. The view shed analysis is comprised of views from inside of the NFATC and from the surrounding Alcova Heights and Barcroft neighborhoods where the proposed new construction may be visible. Your recommendations for developing the view shed analysis included guidance on conducting a "red balloon" test to verify visibility, but we have opted to utilize computer simulations to determine site lines. We have had success with this method on numerous Section 106 consultations and feel it will produce an accurate representation of visible site lines.

In addition to conducting the view shed analysis, we have revised the APE to include the Unitarian Universalist Church of Arlington, located at 4444 Arlington Blvd. Through the Environmental Assessment scoping and comment process we received comments from the Arlington County Planning Commission requesting the inclusion of the National Register listed Church in the APE.

With regard to the Arlington Hall Station Historic District boundary reduction, GSA is in agreement with your comments. However, due to the current project's scheduling we would like to propose that the existing boundaries be utilized for the current determination of adverse effects review. We could then address the boundary reduction and associated cultural resource survey efforts as an action item under the Programmatic Agreement (PA).

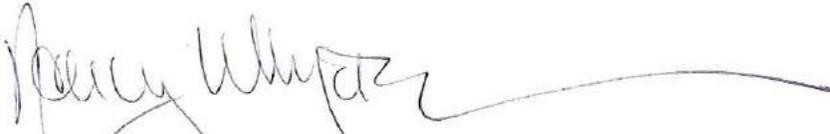
U.S. General Services Administration
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In response to your comments on the propose vegetative screening and what kind of species we are considering, at this time we have not made a final determination. We are planning on addressing these issues in consultation with DHR during the landscape design development for campus at a future date. In addition, the historic meadows and pond bridges do retain integrity and will not be altered but incorporated into the final landscape design.

Finally we agree with DHR's request to include the design review process into the PA and will work with you in the development of appropriate language. Upon receipt of the DHR determination of effects following your review of the view shed analysis and revised APE, GSA will submit the draft PA for your consideration. We anticipate that the PA will address archaeology, building design review, the Arlington Hall Station Historic District boundary reduction and protocols for developing mitigation, minimization and avoidance criteria. Because we anticipate utilizing a PA to address potential adverse effects, GSA will be extending an invitation to the Advisory Council on Historic Preservation (ACHP) to participate in the consultation in addition to the Arlington Department of Planning, Housing and Development, the Arlington Historical Society, the National Guard Bureau and the National Capital Planning Commission.

To expedite your review the view shed analysis and revised APE documentation will be uploaded the DHR FTP site. If you have any questions please contact Hector Abreu at hector.abreu@gsa.gov or Gary Porter at gary.porter@gsa.gov. We look forward to receiving your comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Witherell", followed by a long horizontal flourish.

Nancy Witherell
Regional Historic Preservation Officer
National Capital Region

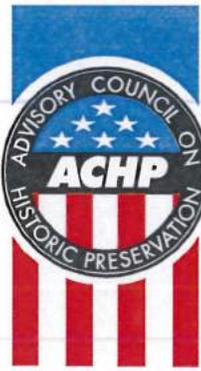
Enclosures

Revised APE
View Shed Analysis

Milford Wayne Donaldson, FAIA
Chairman

Leonard A. Forsman
Vice Chairman

John M. Fowler
Executive Director



Preserving America's Heritage

February 24, 2017

Mr. Timothy O. Horne
Acting Administrator
U.S. General Services Administration
1800 F Street, NW, Room 6400
Washington, DC 20405

Ref: *Proposed Master Plan Update for the George P. Schultz National Foreign Affairs Training Center, Arlington, VA*

Dear Mr. Horne:

In response to a notification by the U.S. General Services Administration (GSA), the Advisory Council on Historic Preservation (ACHP) will participate in consultation to develop a Programmatic Agreement (PA) for the subject project. Our decision to participate in consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within our regulations, "Protection of Historic Properties" (36 CFR Part 800). The criteria are met for our participation as this project has the potential for presenting procedural problems.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Ms. Beth Savage, Federal Preservation Officer, GSA, and Ms. Nancy Witherell, Regional Historic Preservation Officer, National Capital Region, GSA, of this decision.

Our participation in this consultation will be handled by Ms. Kirsten Kulis, GSA Liaison, who can be reached at 202-517-0217 or via e-mail at kkulis@achp.gov. We look forward to working with your agency and other consulting parties to seek ways to avoid, minimize, or mitigate potential adverse effects on historic properties and to reaching and documenting consensus in the PA.

Sincerely,

John M. Fowler
Executive Director



HISTORIC PRESERVATION SECTION
DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
ARLINGTON COUNTY, VIRGINIA

TO: Alexis Gray, NEPA Compliance Specialist, General Services Administration
Hector Abreu, Historic Preservation Specialist, General Services Administration

FROM: Rebecca Ballo, Historic Preservation Planner, Arlington County Government

DATE: March 9, 2017

SUBJECT: Arlington County CLG Comments on Section 106 Documentation for the George P. Shultz National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update

This memo contains the Arlington County Government, Historic Preservation Section's comments on the relevant documents made available for our review under Section 106 of the National Historic Preservation Act (NHPA) for the Master Plan Update at the George P. Shultz National Foreign Affairs Training Center (NFATC) located in Arlington, VA.. If there are any questions, please contact Rebecca Ballo at rballo@arlingtonva.us or 703-228-3812. We thank you for the opportunity to comment on this project.

1. The viewshed analysis, massing diagrams, and preliminary site plans demonstrate that proposed Building B will be constructed within very close proximity to the NR contributing gymnasium building. One elevation will be built within 26 feet of the historic building. We would encourage GSA to shift as much of the mass of the new building as possible to the south, in the area adjacent to the existing parking lot. There is no information provided regarding design guidelines or the potential architectural character of the proposed Building B. Given its immediate proximity to an historic building, we would strongly recommend that the new building attempt to respond to the historic gym in terms of the material palette, form, and detailing. The space between the historic gym and proposed Building B is narrow and care should be taken so that this area is landscaped or detailed appropriately. The connections between the new buildings, the historic buildings, and the ways in which circulation within the campus may be impacted have not been evaluated, but should be considered as part of final landscape plans for the campus.
2. The viewshed analysis from adjacent Arlington County National Register and National Register eligible districts demonstrated that Building B will be visible from a number of vantage points. We would encourage the design of this building to be highly articulated on all elevations. Even the "rear" elevation will be uniquely visible.
3. Viewshed studies provided for review did not take into accounts the new security fencing or the limits of disturbance required to install the new fencing. The installation of the fences may require that most of the small trees and understory growth that currently exist on the property lines, and that serve as a natural visual buffer between the NFATC and the neighborhoods will be removed. Therefore, we cannot concur or give a recommendation about viewshed impacts from the installation of new fencing; this information may also not be known by GSA at this time. We would recommend that if trees and natural landscape buffers must be removed, that GSA commit to replanting along the perimeters with evergreen or similar all-season landscape visual buffers.

- a. The portion of the property where the walking path is currently located will be newly fenced off and restricted as part of this undertaking. Viewshed analysis do not take these new measures into account, though comments from above regarding landscaping would apply.
4. Our office would like to be involved as a Consulting Party for any forthcoming Programmatic Agreements or other agreement documents for this Master Plan and associated undertakings.



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

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Julie V. Langan
Director

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March 13, 2017

Nancy Witherell
Regional Historic Preservation Officer
U.S. General Services Administration
National Capital Region

Re: George P. Shultz National Foreign Affairs Security Training Center (NFATC)
Master Plan Update
Arlington, Virginia
DHR File No. 2016-0732

Dear Ms. Witherell:

Thank you for your letter of February 10, 2017 providing the Department of Historic Resources with a viewshed analysis and revised Area of Potential Effects (APE). Based on the documentation provided, we agree that the proposed Master Plan Update has the potential to have adverse effects on historic properties. Because the effects cannot be fully determined prior to approval of the undertaking, we agree that a programmatic agreement (PA) should be developed.

DHR understands that GSA:

- Has revised the APE to include the Unitarian Universalist Church in Arlington;
- Will retain the existing boundaries of the Arlington Hall Station Historic District for the purposes of its current determination of adverse effect and will revisit the survey and subsequent potential boundary reduction efforts as an action item under the PA;
- Will address the proposed vegetative screening and species in consultation under the PA on the landscape design development for campus.
- Will include the design review process in the PA.

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DHR also understand that the historic meadows and bridges retain integrity and will not be altered, but integrated into the final landscape design.

While we understands that Arlington Hall Station Historic District's (DHR ID#000-0018) integrity has been diminished by the National Guard complex and the cumulative effects of other construction projects, preserving the remaining historic resource integrity is, therefore, all the more important going forward. The design details of the proposed new buildings should be contemporary and compatible to the District as well as being sensitive to the remaining historic resources left in the District.

We also recommend that the New Security Fencing design, the limits of disturbance for the installation of the fencing and the secondary effects that this will have on the landscape and/or campus layout, should be also addressed in continued consultation under the PA.

We appreciate GSA's plans to address archaeology, building design review, the Arlington Hall Historic District boundary reduction and protocols for developing criteria for avoidance and mitigation as well as mitigation in the PA. We note that the Advisory Council on Historic Preservation (ACHP) has elected to participation in consultation toward the PA. Please continue your outreach with the tribes and the Arlington Department of Planning, Housing and Development, the Arlington Historical Society, the National Guard Bureau and the National Capital Region Planning Commission, as you proceed in the development of the PA.

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for archaeology) at (804)482-6088; e-mail ethel.eaton@dhr.virginia.gov, or and Adrienne Birge-Wilson at (804) 482-6092; e-mail adrienne.birge-wilson@dhr.virginia.gov (for architectural issues). We look forward to working with you, the ACHP, and the other consulting parties to bring this project to a successful resolution.

Sincerely,



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