



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO:
L3215A (GWMP)

September 26, 2012

Steve Cole
Arlington County Planning Commission
2100 Clarendon Blvd
Arlington, Virginia 22201

Dear Mr. Cole:

I'm writing to you in your capacity as the Planning Commission staff member assigned to the Rosslyn Plaza Site Plan Review Committee (SPRC). The National Park Service (NPS) has an interest in this project due to its proximity and potential impact to national park land in Virginia and the District of Columbia, especially, the Theodore Roosevelt Island National Memorial (THIS), a presidential memorial on the National Register of Historic Places. In addition, early versions of the plans for this project include the use of park land via a pedestrian bridge from the project site to the parking lot for THIS. We would like to provide the SPRC with some general statements and background on this project.

In a letter dated November 2010, former George Washington Memorial Parkway (GWMP) Superintendent Dottie Marshall contacted the Virginia Department of Transportation (VDOT) regarding an early action related to this project in reference to a shift in limited access control along Arlington Ridge Road. At the time, we asked VDOT to delay this approval until more plans related to the Rosslyn Plaza project became available for public review. We did not agree with VDOT providing allowances to an as-of-then unseen project with possible impacts to THIS. A copy of that letter is enclosed. At a later date, we contacted VDOT a second time in response to a determination of effect on historic properties in the area of the project. We ask the SPRC please keep in mind possible impacts to THIS as this planning effort moves forward.

Based on the early drafts of the plan that are available, it appears the developer is proposing to build four of the six buildings at the site to the maximum allowable 300 feet, as prescribed by the C-O-Rosslyn zoning district. The other two buildings are proposed at 293 and 63 feet. We would like to remind the SPRC of the latest draft (dated 9/17/2010) of the Rosslyn Coordinated Redevelopment District Height Plan and Sculpting Guidelines, developed by the Long Range Planning Commission.

These guidelines stated, "Achieve an attractive and compelling skyline characterized by innovative and high quality architecture, and variation in the height, spacing and design of building towers." A full height buildout on four out of the six buildings on this site would not, in our opinion, demonstrate a "variation in the height" of buildings on the site.

Regarding the proposed pedestrian overpass to the THIS parking lot, which has been proposed as a part of this design, the National Park Service not been approached by the developer as to the feasibility of such a project. Taken as a single action, we anticipate this proposal would require an extensive public environmental analysis in keeping with the National Environmental Policy Act of 1969 (NEPA) and Section 106 of the National Historical Preservation Act of 1966 ("Section 106"). Any NEPA and Section 106 analysis would need to include alternatives for consideration. Also, we currently have an active NEPA and Section 106 process looking at an area north of the parking lot as a possible site for an Arlington County non-motorized boating facility. How these two projects relate, if at all, would have to be addressed in the future. In short, we expect the NEPA and Section 106 analysis for this proposal would be quite complex.

Finally, any proposal for a pedestrian bridge connected to the parking lot at THIS will require the NPS to submit the plans for review by the U.S. Commission of Fine Arts and the National Capital Planning Commission.

Thank you for your consideration of these comments. As a neighbor and interested party, we expect to remain an active participant in Arlington planning processes that affect national park land

Sincerely,



Jon G. James
Acting Superintendent

Enclosure

cc:

Ms. Elizabeth Kays

Principal Planner, Department of Community Planning, Housing and Development
Planning Division
2100 Clarendon Blvd., Suite 700
Arlington, VA 22201



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
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IN REPLY REFER TO
L3000L

May 19, 2011

Ms. Helen P. Ross
District Preservation Manager
Virginia Department of Transportation
87 Deacon Road
Fredericksburg, VA 22405

Re: Determination of Effect. PMI#: 1000921 [Related to VDOT Project nos. 0066-000-102, R205 and 0066-000-102, C504] (VDHR File No.:2011-0479) Arlington County

Dear Ms. Ross:

Thank you for your letter dated April 13, 2011 on the subject undertaking. We are providing a response concerning potential viewshed impacts to historic properties under the administration of the George Washington Memorial Parkway (GWMP).

As your letter points out, the George Washington Memorial Parkway is a National Park Service site listed on the National Register of Historic Places and falls within the identified area of potential effect. GWMP was placed on the National Register in part for its scenic and viewshed qualities. As noted in my November 30, 2010 letter to Mr. Moore, Theodore Roosevelt Island (TRI), a presidential memorial listed on the National Register of Historic Places in part for its natural, historic and scenic landscape values, is located directly to the east of I-66 in this area. NPS staff believe TRI and the George Washington Memorial Parkway should be identified as historic properties in the area.

GWMP staff remain concerned about ongoing visual impacts to the George Washington Memorial Parkway along the entire length of the road from development projects in surrounding counties. The Capper Cramton Act of 1930 established the GWMP in part for the "... protection and preservation of the natural scenery of the Gorge..." and views to and from the park are important to maintaining the character of this resource.

The implementing regulations of Section 106 of the National Historic Preservation Act of 1966, as amended, 36 Code of Federal Regulations (CFR) 800 provide specific criteria by which a project is considered to present adverse effects to historic properties. 36 CFR 800.5 (a)(2) provides examples of adverse effects, one of which is the "Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features."

Scenic landscapes and viewsheds are some of the major historic features of both TRI and the George Washington Memorial Parkway. The Vornado/Charles E. Smith and Gould Property Companies have made no secret of their desire to re-develop the property immediately to the west of I-66 in this area. Although no plans have been finalized, artist renderings we have seen of the proposed project show an increase in the size and scope of the development at the site. Should the Virginia Department of Transportation (VDOT) sell these lots to the Vornado/Charles E. Smith and Gould Property Companies, it would allow the company to build out the site in a way that may introduce visual elements diminishing the integrity of these properties.

We recommend VDOT's historical review of the conveyance of these parcels include, both the George Washington Memorial Parkway and Theodore Roosevelt Island. Since the conveyance of this property will allow for increased development at the site, we also request the review consider the full-build out of this property, and its visual impacts on the aforementioned historical resources. As stated in our November 30, 2010 letter, this proposed shift will, in essence, be providing more land for development next to a National Park Service unit. We feel it is in the best public interest the decision on this subject undertaking be made in conjunction with a public planning process for the site.

Due to the federalization of this activity, GWMP is also curious if a National Environmental Policy Act (NEPA) analysis will be performed on this action. A NEPA analysis would require determining if the action would have additive effects on a resource, or cumulative action, as defined in 40 CFR 1508.25(a)(2). Will such an analysis be performed?

Thank you for contacting us and soliciting our comments on this subject undertaking.

Sincerely,



Jon G. James
Deputy Superintendent, George Washington Memorial Parkway

bcc:

GWMP Files
GWMP Supt. Marshall
GWMP IRRM Virta
GWMP IRRM Helwig

BHelwig:05-16-11:703-289-2515



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO
L1425 (GWMP)

November 30, 2010

Mr. Garrett Moore, PE
Northern Virginia District Administrator
4975 Alliance Drive
Fairfax, VA 22030
VIA EMAIL

Re: Proposed northeast shift in limited access control along the southwest side of I-66
adjacent to Arlington Ridge Road, Arlington County

Dear Mr. Moore:


This letter is in response to a public notice in the *Washington Post* on November 12, 2010 on the subject undertaking. We are concerned about potential viewshed impacts to historic properties under the administration of the George Washington Memorial Parkway (GWMP), a unit of the National Park Service (NPS). Theodore Roosevelt Island, a property listed on the National Register of Historic Places in part for its natural, historic and scenic landscape values is located directly to the east of I-66 in this area.

We have not been able to locate much public information on the impacts of this proposed shift in Limited Access Control. We believe it is connected to a project for this site informally called "Rosslyn Plaza". Shifting this Limited Access Control will allow more room to build out closer to I-66 and lands under the administration of NPS.

We request that the Commonwealth Transportation Board defer a decision on this item until specific plans detailing the full range of projects proposed for this site are made publically available. This proposed shift will, in essence, be providing more land for development and we feel it is in the best public interest that the decision on this subject undertaking be made in conjunction with a public planning process for the site.

Thank you for your consideration. As a neighbor, we look forward to our continued involvement. If there are any questions, please do not hesitate to contact me at 703-289-2500.

Sincerely,



Dottie P. Marshall

Superintendent, George Washington Memorial Parkway

Enclosure

bcc:

GWMP Files

GWMP Supt. Marshall

GWMP Feldman

GWMP Helwig

NCR DeMarr

BHelwig:703-289-2543:11-30-10