

## **RECONSTRUCTION AND REHABILITATION PROJECT: CROOK WALK BRIDGE AND SECTION 37 STORMWATER CHANNEL**

Army National Military Cemeteries  
Arlington National Cemetery  
Arlington, Virginia

### **SECTION 106 PROCESS SUBMISSION:**

PROJECT DESCRIPTION, IDENTIFICATION OF CONSULTING  
PARTIES, IDENTIFICATION OF HISTORIC PROPERTIES, AREA  
OF POTENTIAL EFFECTS, & ASSESSMENT OF EFFECTS

ANMC Project Point of Contact:

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Submission: 9 September 2025



## Project Vision:

- Repair and rehabilitate Crook Walk bridge and the Section 37 drainage channel system.

## Project Goals:

- Re-establish integrity to both the footbridge and channel, which are contributing elements to the Arlington National Cemetery National Register Historic District.
- Improve high traffic pedestrian foot bridge for visitors traversing between Arlington House / Tanner Amphitheater and the Memorial Amphitheater.
- Ensure the safe flow and drainage of stormwater runoff in the cemetery.
- Repair character-defining features, matching and thereby restoring the original aesthetic design of the bridge and channel.
- Removal of trees encroaching on the channel and replacement further away with of non-invasive species.

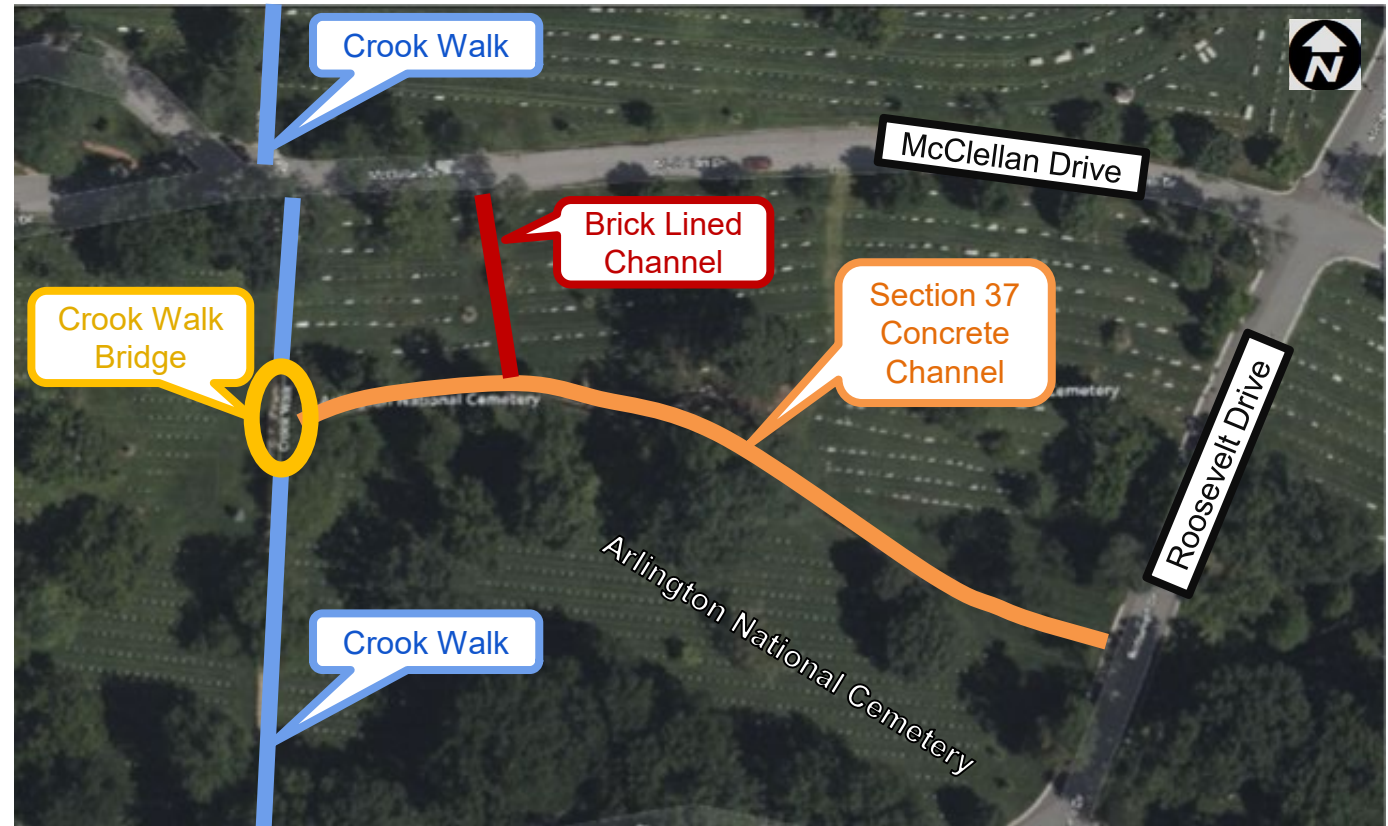


Section 37 drainage system, looking west toward the Crook Walk bridge, where the brick-lined channel connects with the concrete channel



## PROJECT AREA DESCRIPTION

- This project is within the Arlington National Cemetery (ANC) National Register Historic District. The cemetery property is owned and maintained by Army National Military Cemeteries (ANMC).
- The proposed reconstruction and rehabilitation of Crook Walk bridge and the drainage channel would occur in ANC burial section 37 near McClellan, Roosevelt, and Wilson Drives.
- Crook Walk bridge is a footbridge along the paved pedestrian pathway known as Crook Walk, which provides pedestrian circulation between Arlington House/ Tanner Amphitheater and the Memorial Amphitheater.
- The project includes a smaller bridge near the center of the channel, which serves as a crossing for staff, maintenance and operations equipment.
- The Section 37 channel is a stormwater drainage channel and culvert that runs perpendicular from Crook Walk bridge to Roosevelt Drive.



Project Area Map



## Project Design Guidance

Through a deliberative design process, the project design team developed the following design guidance and constraints:

- The design will be in accordance with Arlington National Cemetery's design guidelines.
- The project will be designed with an intent of a minimum lifespan of 50 years, with regular maintenance to maximize longevity.
- Minimize impacts to the surrounding ANC property, including mature trees, grave markers, and burial spaces.
- Preserve the character-defining features of the historic viewshed, including keeping the channel open and uncovered, maintaining the winding and low-profile nature of the channel through the burial section, while also preserving as many trees and burial spaces as possible.
- Preserve the character of the two pedestrian bridges, while making them structurally sound and capable of withstanding stormwater flows.
- Salvage and rehabilitate stone and brick elements of the drainage system.
- Restore structural integrity of the entire drainage system and improve water flow paths.
- Address cracking, broken concrete, staining, plant infiltration, and structural failures in the bridge and channel elements.
- Remove non-functional drainage components, such as French drains and broken terracotta pipes, from the burial sections, which will improve ground stability and potentially open more space for burials and trees.
- Rehabilitate as much of the original Crook Walk bridge as possible. Stabilize and repair the bridge to address the root cause(s) of structural cracking, prevent further structural compromise and water infiltration.
- Ensure final surface finishes for the bridges and channel are consistent with the original design intent (i.e., cementitious parging visually uniting individual channel and bridge components).



## OVERVIEW OF PROJECT ELEMENTS

### Overview of Proposed Project Elements:

- Removal and replacement of the bridge's cracked parapet walls.
- After bridge repairs, removal and reapplication of ½-inch coat of cementitious parging on all bridge surfaces.
- Removal and replacement of all concrete channel elements, currently deteriorated concrete slabs and culverts, with remnants of a cementitious parge coating.
- Partial realignment of the channel, to improve channel flow and capacity.
- Reset and repoint extant brick channel and culvert.
- Removal and replacement of a secondary concrete footbridge (used for grounds maintenance and funeral operations) in its original location.
- Removal of two trees whose roots encroach on the channel, one of which is an invasive Tree-of-heaven. Plant two new trees, in a more suitable location, and replace the Tree-of-heaven with a non-invasive species.



Existing Section 37 Channel



- Land disturbance limit / project limit:  
0.32 acres
- Limits of disturbance / project limits:  
extending 12-feet on either side of the culvert  
for necessary excavations
- Length of project: +/- 2,500 < feet
- Land disturbance activity includes excavation  
for bridge foundation repairs, resetting brick  
channel, demolition and replacement of  
existing concrete channel, erosion and  
sediment control (ESC), installation, clearing  
and grubbing, rough and final site grading.
- Length & Width of existing channel: 435-feet  
long, width that varies from 2.5 up to 9.5-feet.
- Trench excavation/channel lining depth:  
+/- 4 to 6 feet deep, depending on elevation
- Trench excavation/channel lining width:  
+/- 3 to 10-feet, depending on channel section



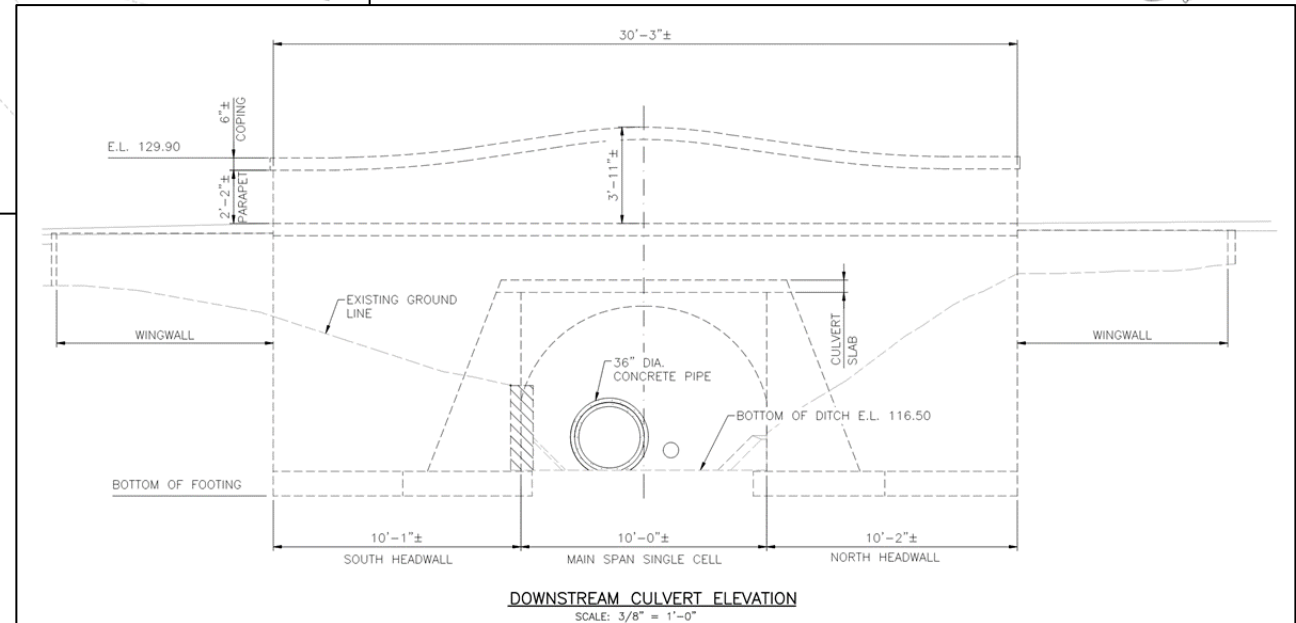
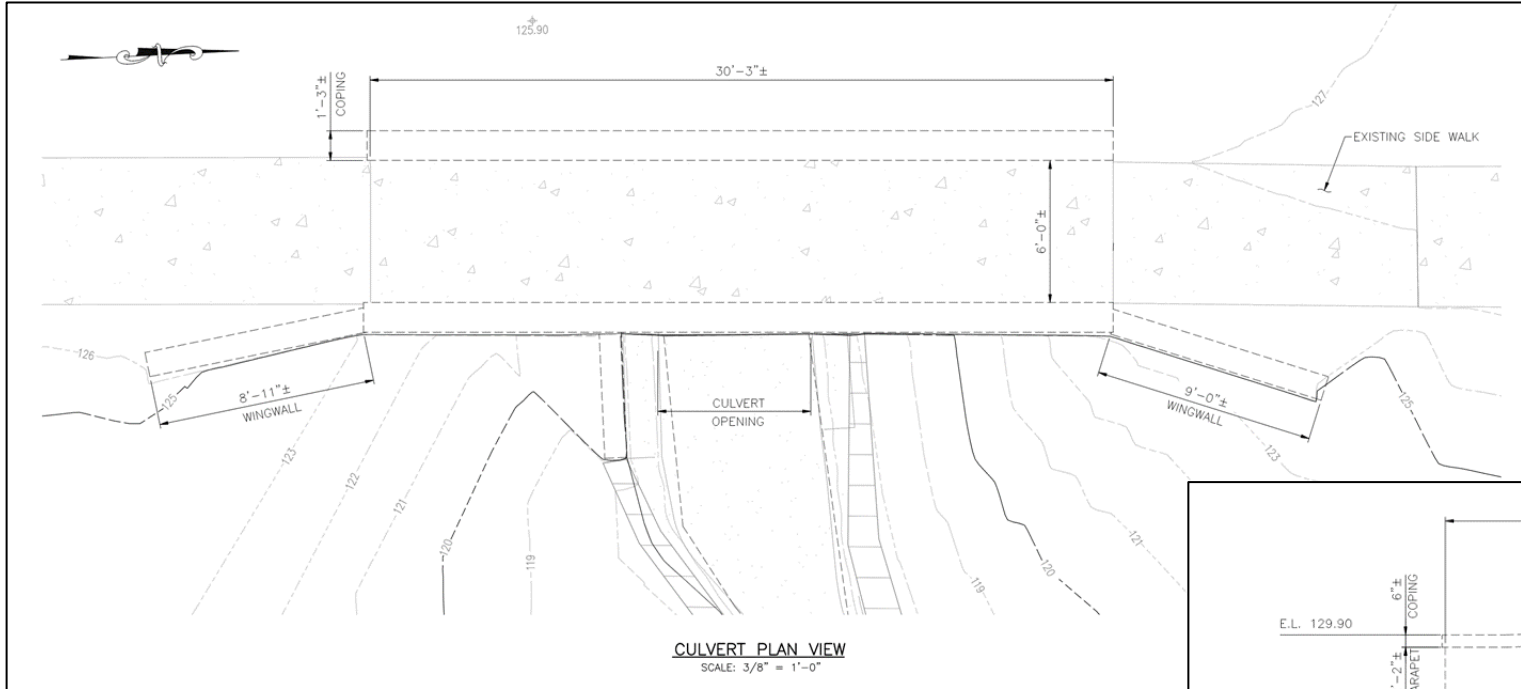
Map of Proposed Limits of Disturbance (LOD) for the Project



## EXISTING CONDITIONS: PHOTOS, DRAWINGS, & ILLUSTRATIONS



# CROOK WALK BRIDGE: EXISTING CONDITIONS





## BRIDGE PARAPET WALLS: EXISTING CONDITIONS

The conditions assessment identified fracture cracks through the parapet walls ranging between 1/8-inch and 1/4-inch, raising concerns about the structural integrity of the parapet walls and their foundations.



Eastern parapet wall, wingwalls, and culvert at Crook Walk bridge



Western parapet wall of Crook Walk bridge, after structural investigation and temporary patching of cementitious parging and structural cracks



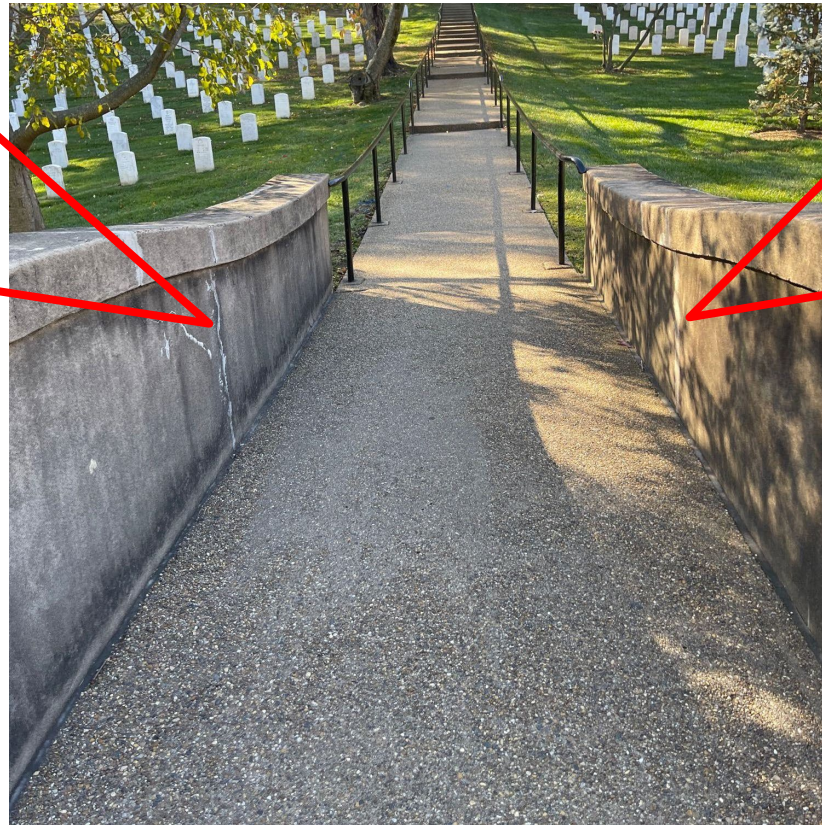
## BRIDGE PARAPET WALLS: EXISTING CONDITIONS

Potential root causes of the structural cracking:

1. If the wingwalls have a footing foundation, the cracks between the slab bridge and the wing walls could be a result of the structure not being able to expand and contract at this location.
2. If the wing walls are functioning as a retaining wall, the walls could be experiencing vertical settlement due to insufficient soil strength or undermining beneath the foundation causing the walls to rotate and fracture. If the wing walls are cantilevers, vertical settlement or undermining may allow rotation if the horizontal rebars carrying the tension load at the top of the parapet have corroded and no longer carry the tension force.



**Detail of crack on the inside of the East parapet wall on Crook Walk bridge, before structural investigation**



**Detail of crack on the inside of the West parapet wall on Crook Walk bridge, before structural investigation**



## BRIDGE PARAPET WALLS: EXISTING CONDITIONS



Detail images of  
North end of East &  
West parapet walls





## BRIDGE PARAPET WALLS: EXISTING CONDITIONS

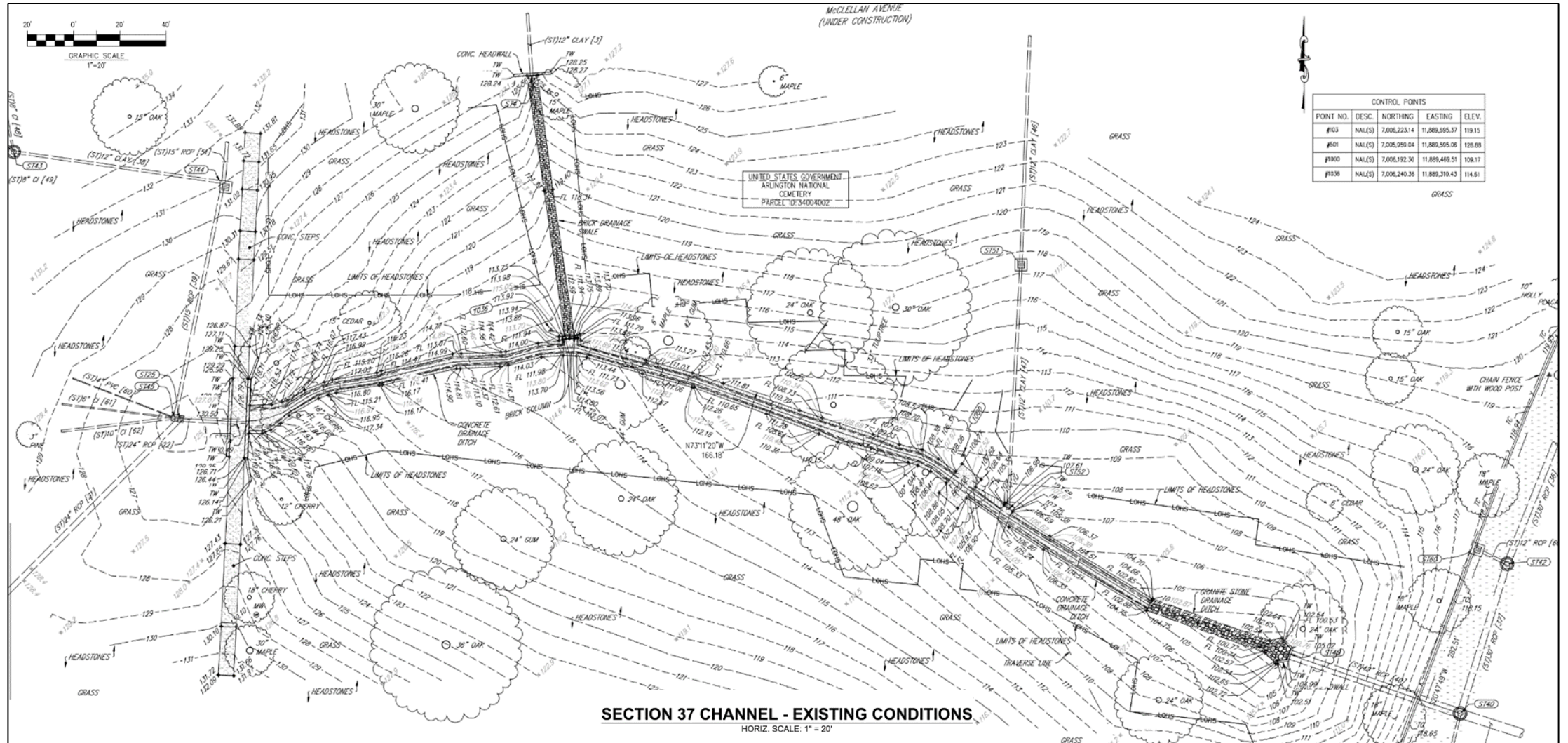


Details of  
cracking near  
the center of  
the East and  
West parapet  
walls





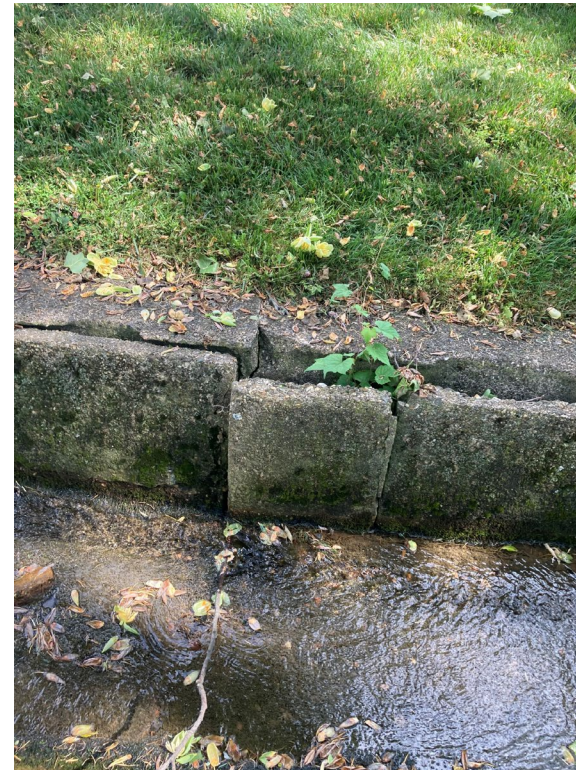
# SECTION 37 CHANNEL: EXISTING CONDITIONS





## CHANNEL: EXISTING CONDITIONS

- Signs of deterioration due to age, erosion, and sediment accumulation.
- Between masonry units (concrete, brick, and stone), there is significant mortar loss, in addition to overall cracking, spalling, joint failure, displacement, and bio-vegetation growth on surfaces and between units.
- A majority of the concrete channel panels exhibit material/dimensional losses, displacement, detachment, and a loss of cementitious parge coatings. In several locations encroachment by trees and their root systems are contributing to movement of the concrete panels.



Detail photos of loose, deteriorated concrete panels in the Section 37 channel



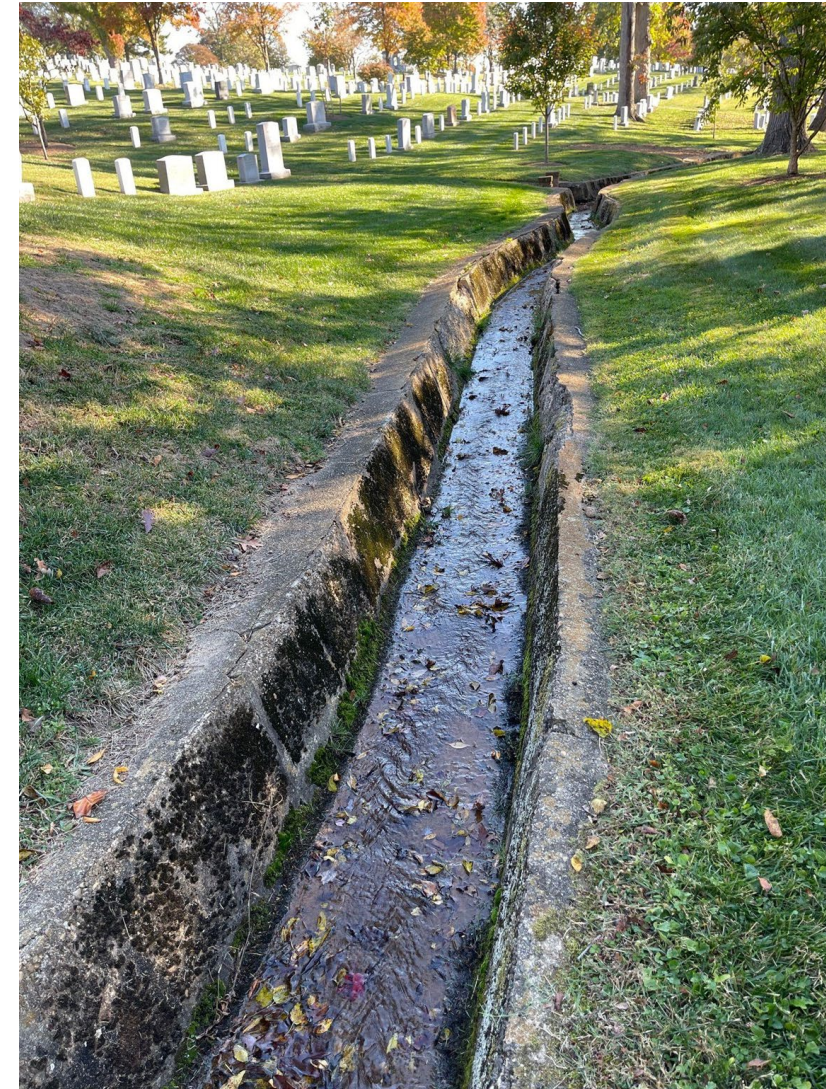
## CHANNEL: EXISTING CONDITIONS



Section 37 brick-lined channel



Section 37 Concrete Channel





## CHANNEL TREE: EXISTING CONDITIONS

Detail image of cracking and concrete surface loss in the channel



Detail of tree and its root system encroaching on the concrete channel



## CULVERTS: EXISTING CONDITIONS



Culvert with granite sidewalls near  
Roosevelt Drive



Culvert at Crook Walk bridge



## OTHER FEATURES: EXISTING CONDITIONS



Abandoned culvert, northeast side of the channel



Secondary footbridge within Section 37 concrete channel



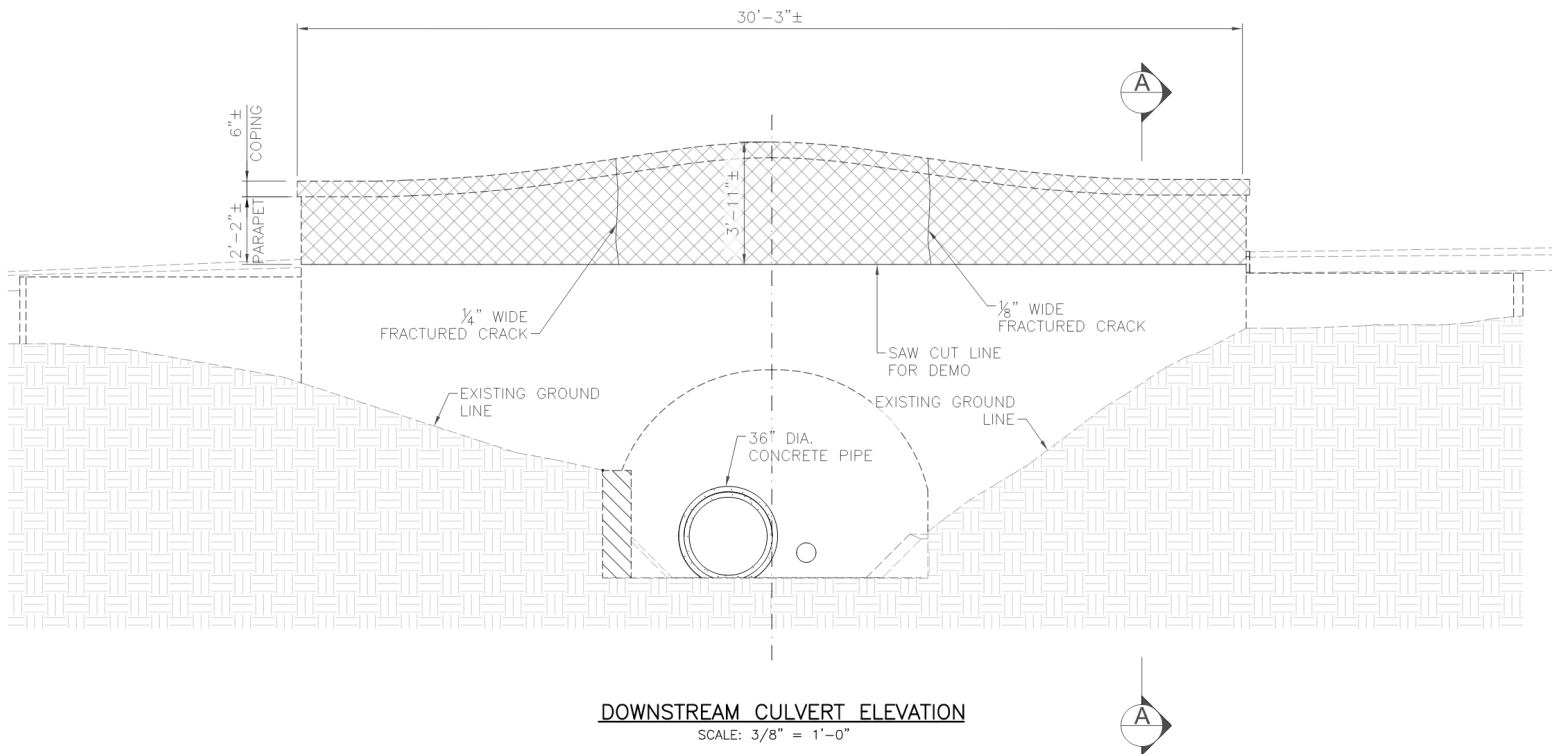
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## CONCEPT DESIGN: DRAWINGS & ILLUSTRATIONS

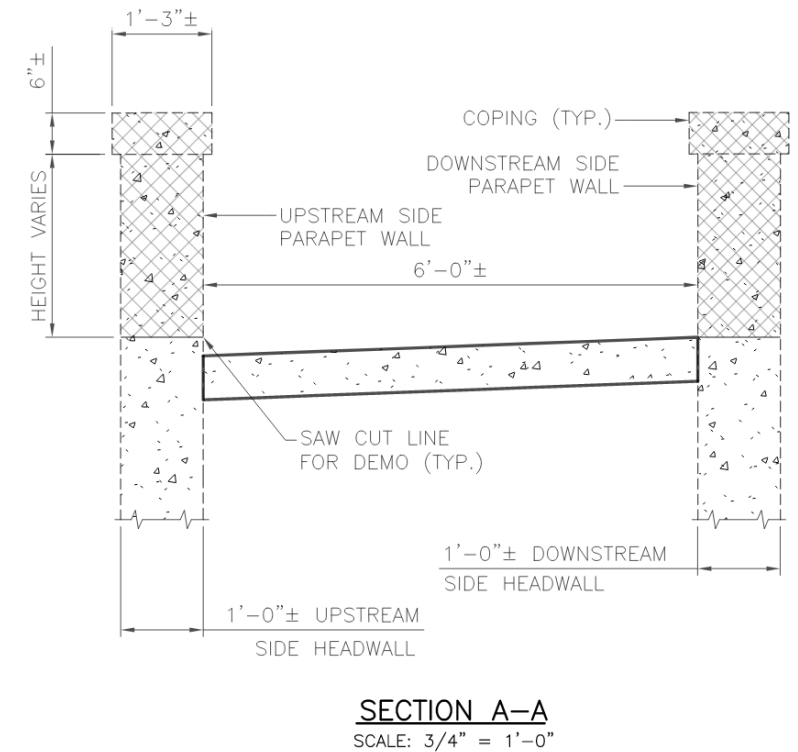


# CROOK WALK BRIDGE: PROPOSED WORK

Downstream view of proposed East parapet wall removal



Section view of proposed parapet wall removals



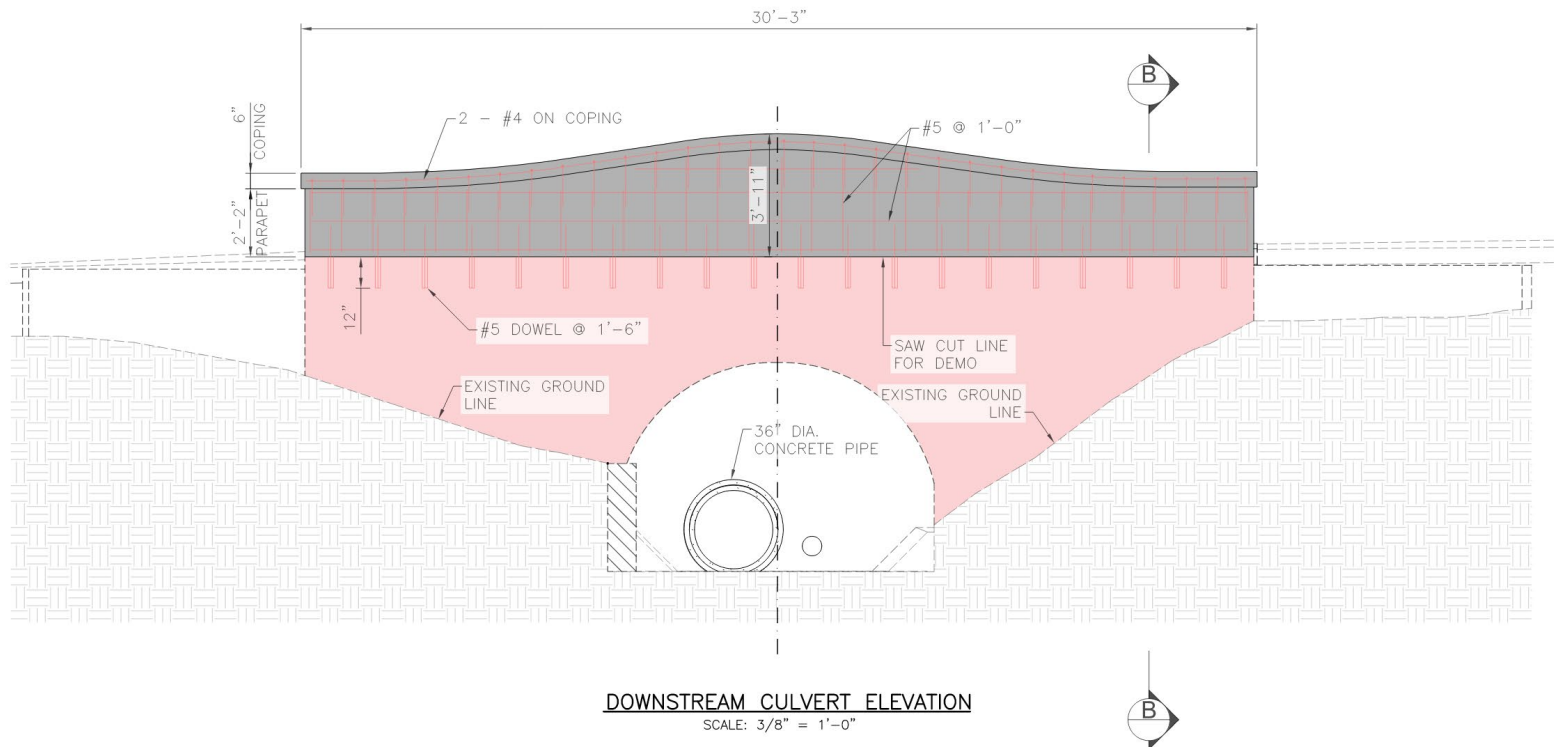
Removal and replacement of the concrete parapet with an in-kind parapet is recommended as the most robust and long-term solution. Restores the structural integrity and durability of the parapet by improving the quality and strength of the concrete, while restoring the historic appearance, preserving a portion of the existing structure while reducing future maintenance costs by addressing the underlying structural issues.

- Concrete Parapet Removal: Remove a 30'-3" long x full height x full-depth section of the concrete parapet.
- Remove 1/2" Existing Parging: Remove existing parging on the entire remaining exposed exterior surface area of the Downstream Headwall.



# CROOK WALK BRIDGE: PROPOSED WORK

Downstream view of proposed East parapet wall reconstruction



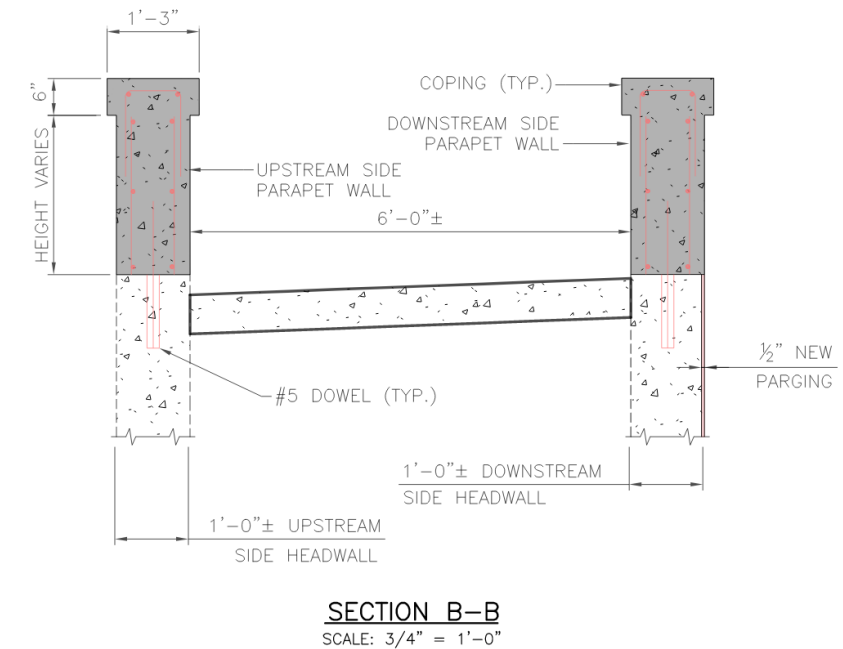
**LEGEND**

- LIMITS OF REMOVAL
- LIMITS OF NEW CONSTRUCTION
- LIMITS OF NEW PARGING

**Reconstruction Notes:**

- **Dowel Installation:** Install dowels at 1'-6" spacing into the existing headwall to tie the remaining portion of the head wall to the new concrete parapet.
- **Reinforcement Installation:** Place reinforcement for the new parapet wall section in accordance with the plan details.
- **Concrete Pour:** Cast the new reinforced concrete parapet to replicate the original parapet design, ensuring it matches the existing structure in dimensions and aesthetics.
- **Parging Application:** Apply a 1/2" thick layer of new parging on the surface of the newly parapet and the remaining existing headwall.

Section view of proposed parapet wall reconstructions





## CROOK WALK BRIDGE: PROPOSED WORK

Location of parapet removal and new construction



Portion of original bridge to remain and be rehabilitated



## CROOK WALK BRIDGE: PROPOSED WORK



Existing conditions  
at Crook Walk bridge  
& culvert, before  
rehabilitation

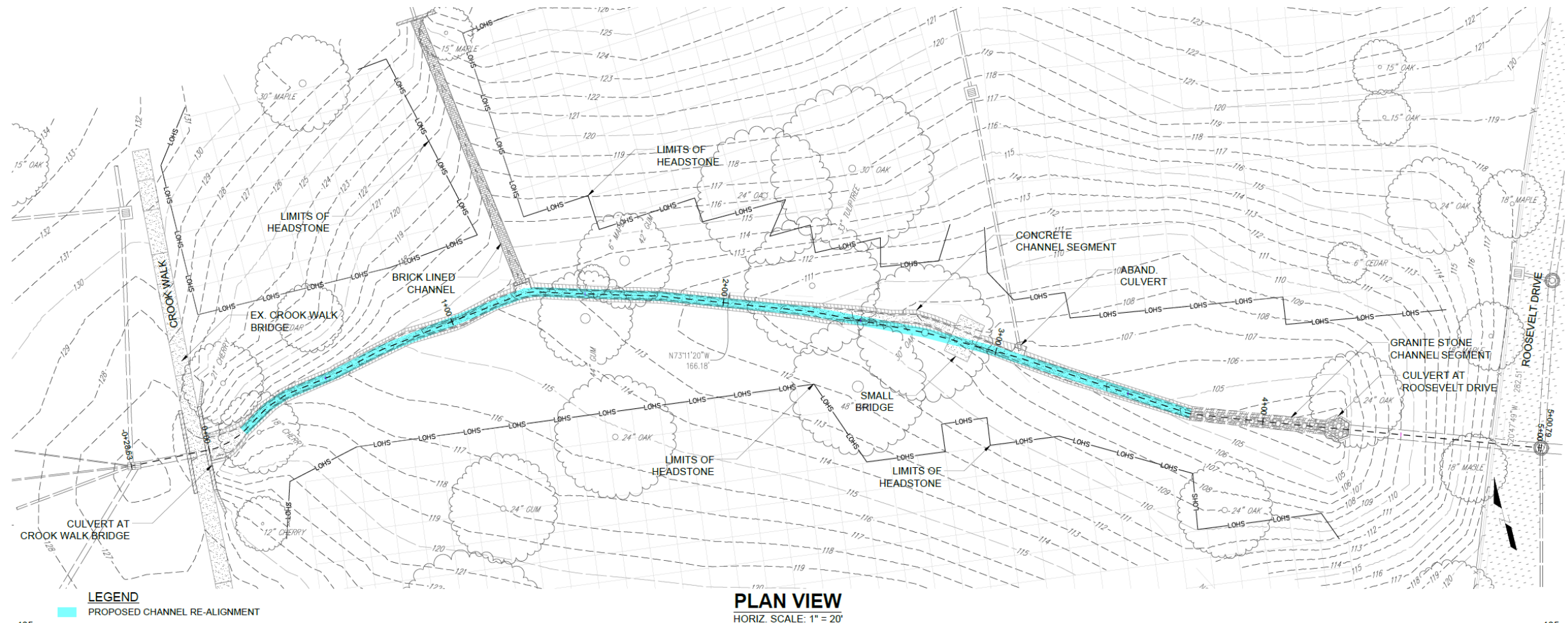


Rendering of Crook  
Walk bridge &  
culvert after  
proposed  
rehabilitation &  
reconstruction



# CHANNEL: PROPOSED REALIGNMENT

After a thorough inspection of the existing drainage infrastructure, it has been determined that the Section 37 channel is undergoing significant deterioration. The concrete sections have sustained severe damage, which undermines the channel's structural stability and disrupts proper water flow. The damage is widespread across multiple locations, making repair efforts impractical and costly. Additionally, the channel's current capacity is insufficient to handle a 10-year storm event, which increases the risk of erosion and potential overtopping. Therefore, the recommended approach is replacement of the concrete and realignment of the channel.

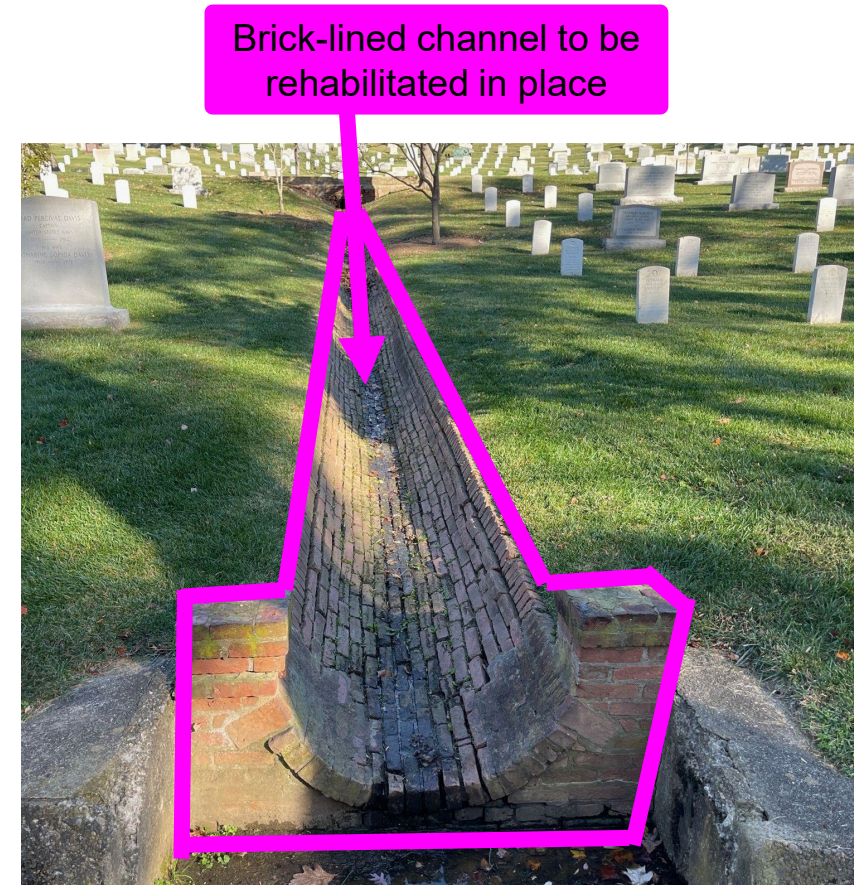




## CHANNEL: PROPOSED WORK



Entire concrete channel  
to be removed and  
replaced



Brick-lined channel to be  
rehabilitated in place



## CHANNEL: PROPOSED WORK

Existing Section 37 channel conditions, before rehabilitation



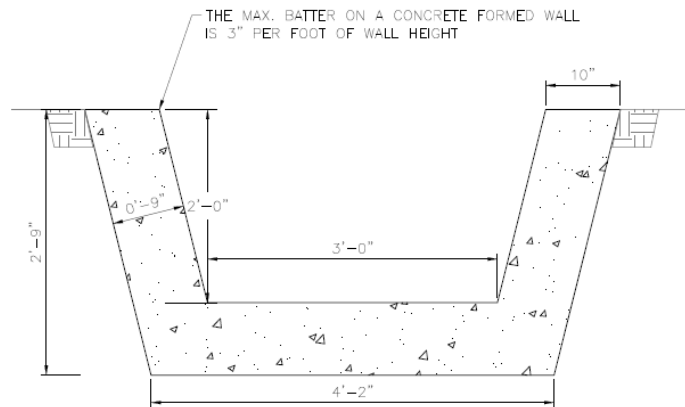
Rendering of Section 37 channel conditions after proposed reconstruction





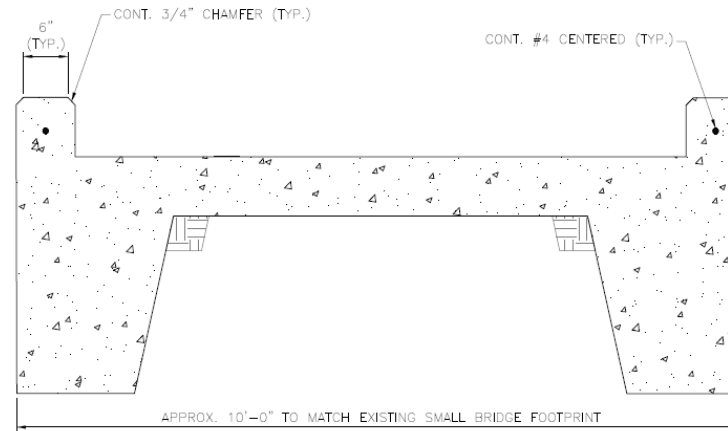
## Sample section drawings of typical pre-cast concrete channel sections and small bridge

NOTE: STRUCTURAL SLURRY CHANNEL SAMPLES WITH DIFFERENT TEXTURES WILL BE PROVIDED TO ARLINGTON NATIONAL CEMETERY (ANC), AND THE TEXTURE THAT BEST MATCHES THE EXISTING AESTHETIC WILL BE SELECTED. THIS IS A PRELIMINARY SELECTION INTENDED TO CONVEY THE DESIGN CONCEPT; FINAL APPROVAL WILL BE BASED ON ANC'S REVIEW OF THE PROVIDED SAMPLES.



TYPICAL CONCRETE WALL  
SECTION (PRECAST OPTION)

SCALE: NTS



TYPICAL SMALL BRIDGE CROSS  
SECTION

SCALE: NTS



### GENERAL NOTES:

1. THE MINIMUM CONCRETE COMPRESSIVE STRENGTH AT 28 DAYS SHALL BE 3,500 PSI AND SHALL COMPLY WITH ACI 318.
2. REINFORCING STEEL SHALL COMPLY WITH ASTM A615 AND SHALL HAVE A YIELD STRENGTH OF 60,000 PSI.
3. ALL JOINT REINFORCEMENT, TIES AND OTHER ACCESSORIES SHALL BE RESISTANT TO CORROSION.
4. EXPOSED HEIGHT VARIES. SEE PROFILE AND CROSS SECTIONS.

Pre-Cast Concrete Wall Sections are recommended for the Section 37 Channel as the most durable and long-term solution due to its superior durability, expedited construction timeline, and long-term cost-efficiency.

### Pre-cast concrete:

- Requires less labor and can be installed more quickly, which is beneficial given the limitations of site access and the constrained available space.
- Maximizes efficient use of available land while maintaining structural integrity, requiring less space than cast-in-place concrete.
- Provides enhanced resistance to tree root intrusion.
- Is manufactured in a controlled environment, ensuring consistent quality, durability, and strength.
- Units are easy to transport and install, making them ideal for sites with limited or difficult access, unlike cast-in-place concrete which may require extensive site preparation.
- Is produced off-site, unlike cast-in-place concrete, minimizing delays and potential quality issues caused by weather conditions.
- Units are similar in design intent to the original individual Section 37 concrete channel elements.



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**NATIONAL HISTORIC  
PRESERVATION ACT (NHPA)  
SECTION 106 DOCUMENTATION**



## SECTION 106 PROCESS INITIATION



View of the Section 37 stormwater drainage channel looking west toward the Crook Walk bridge

Army National Military Cemeteries (ANMC) initiates the section 106 review process for the proposed reconstruction and rehabilitation project for Crook Walk bridge and Section 37 stormwater channel within Arlington National Cemetery (ANC). The proposed project is considered a federal undertaking, as defined in 36 CFR § 800.16(y), and is the type of activity that has the potential to cause effects on historic properties pursuant to 36 CFR § 800.3(a).

Per 36 CFR § 800.3(c), ANMC identifies the Virginia Department of Historic Resources (DHR) as the appropriate State Historic Preservation Office (SHPO) to be involved in the section 106 process.

Per 36 CFR § 800.3(c), ANMC plans to involve the public in the section 106 process. After initiating consultation with the DHR, ANMC will notify potential consulting parties and the public of the undertaking via email, social media, and the ANC website, inviting them to participate in the consultation process. ANMC will work in consultation with the Virginia SHPO to develop the plan for involving the public in the section 106 process.

Concurrent with this submission to the DHR, ANMC is initiating the design review process with the U.S. Commission of Fine Arts (CFA). The concept design will be reviewed at the 18 September 2025 meeting (CFA-3492).



In accordance with 36 CFR § 800.3(f) and § 800.2(c), ANMC developed an initial list of other parties entitled to be consulting parties. This list will be further developed in consultation with the DHR.

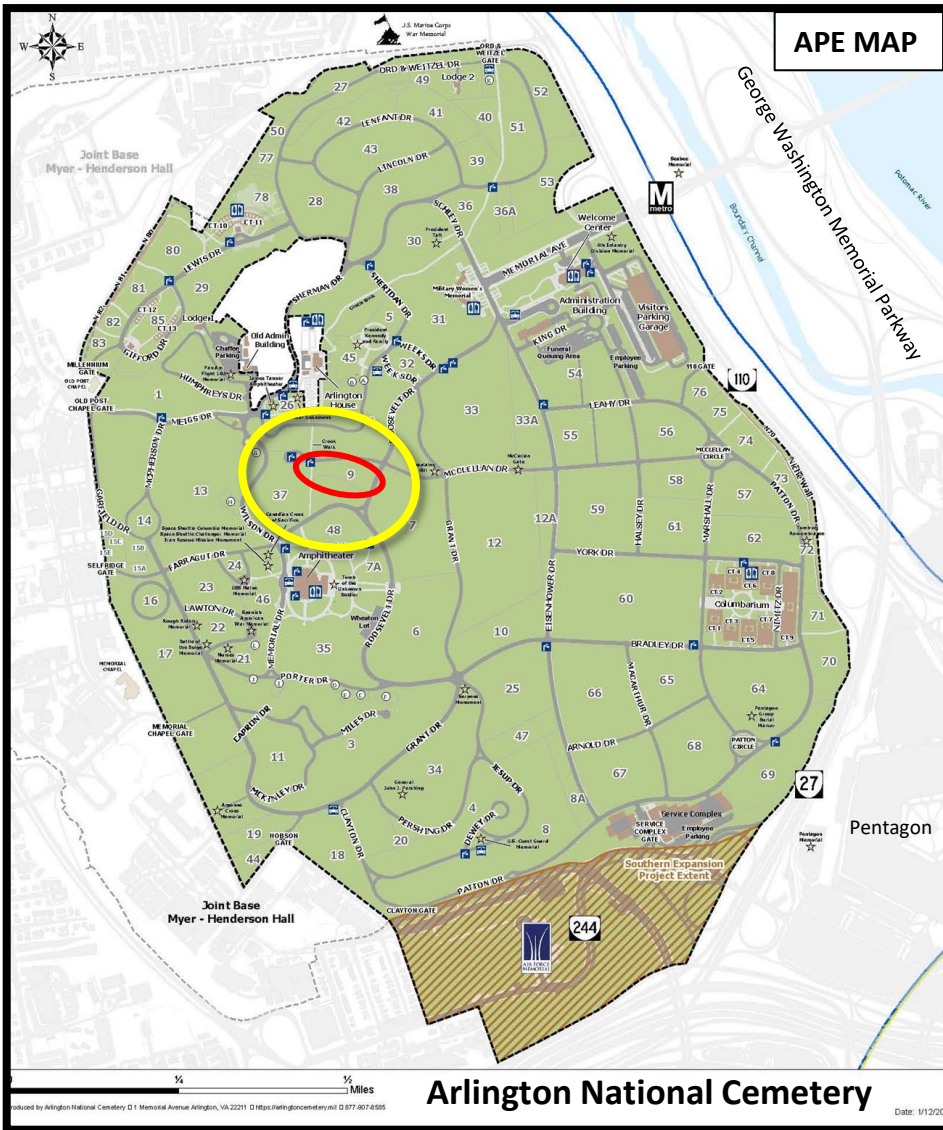
ANMC identified the following other consulting parties:

- Arlington House Family Circle
- Catawba Indian Nation
- Chickahominy Indian Tribe-Eastern Division
- Delaware Nation, Oklahoma
- Nansemond Indian Nation
- National Park Service (NPS), George Washington Memorial Parkway (GWMP)
- Pamunkey Indian Tribe
- Rappahannock Tribe, Inc.
- Upper Mattaponi Tribe
- United States Commission of Fine Arts (CFA)





## AREA OF POTENTIAL EFFECTS (APE)



Per 36 CFR § 800.4 & § 800.16, ANMC identified the Area of Potential Effects (APE) for the proposed project, the full extent of which will be determined in consultation with the DHR.

The APE is the geographic area(s) within which an undertaking may directly or indirectly cause changes in the character or use of historic properties. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking. This includes locations where the project may be visible and/or audible.


VDHR guidelines recommend that the APE includes:

- all locations where the project will cause ground disturbance;
- all locations from which the project may be visible or audible; and
- all locations where the project may result in changes to land use, public access, traffic patterns, viewsheds, etc.

For this undertaking, the project area is located within the Arlington National Cemetery Historic District (Virginia Department of Historic Resources [VDHR] #000-0042). The project area is outlined in red, and the APE is outlined in yellow on the map to the left.

The APE includes locations where equipment will be placed during the bridge and channel demolition and reconstruction. Most of the staging would occur along McClellan, Wilson, and Roosevelt Drives, and equipment would traverse through Section 37 along turfed paths to reach the channel. The channel is located at the low point of a valley between Arlington House / Tanner Amphitheater (to the north) and the Memorial Amphitheater (to the south). Outside the identified APE, the trees and hilly landscape help to isolate and obscure views to and from the proposed project area.

### AREA OF POTENTIAL EFFECTS MAP

 APE outlined in **YELLOW**.

 Proposed project location in **RED**.



## AREA OF POTENTIAL EFFECTS (APE)



During construction, temporary sound and visual effects are expected within 500 feet of the project area. The project involves ground disturbing activities in previously disturbed areas. Work will primarily occur during daytime hours. Construction equipment will access the site via the cemetery's main entrance on Memorial Avenue, the Service Complex Gate at the cemetery's southern entrance, and the Ord and Weitzel Gate at the cemetery's northern entrance. These temporary effects are partially contained and minimized by the bordering roadways and the hilly landscape. During construction, there will be temporary, localized impacts to traffic patterns within the cemetery.

When the project is completed, there will be long-term changes to the viewsheds and landscape within the Arlington National Cemetery Historic District. This includes a partial realignment of the channel, the replacement of existing channel components with new pre-cast sections, and new concrete paving and surface finishes. These changes will be visible within Sections 37 & 9, and from Crook Walk, and McClellan, Wilson, and Roosevelt Drives, where the reconstructed channel and bridge will be visible.

### *National Register Historic Districts*

*From ANC's National Register Nomination Form (2014)*

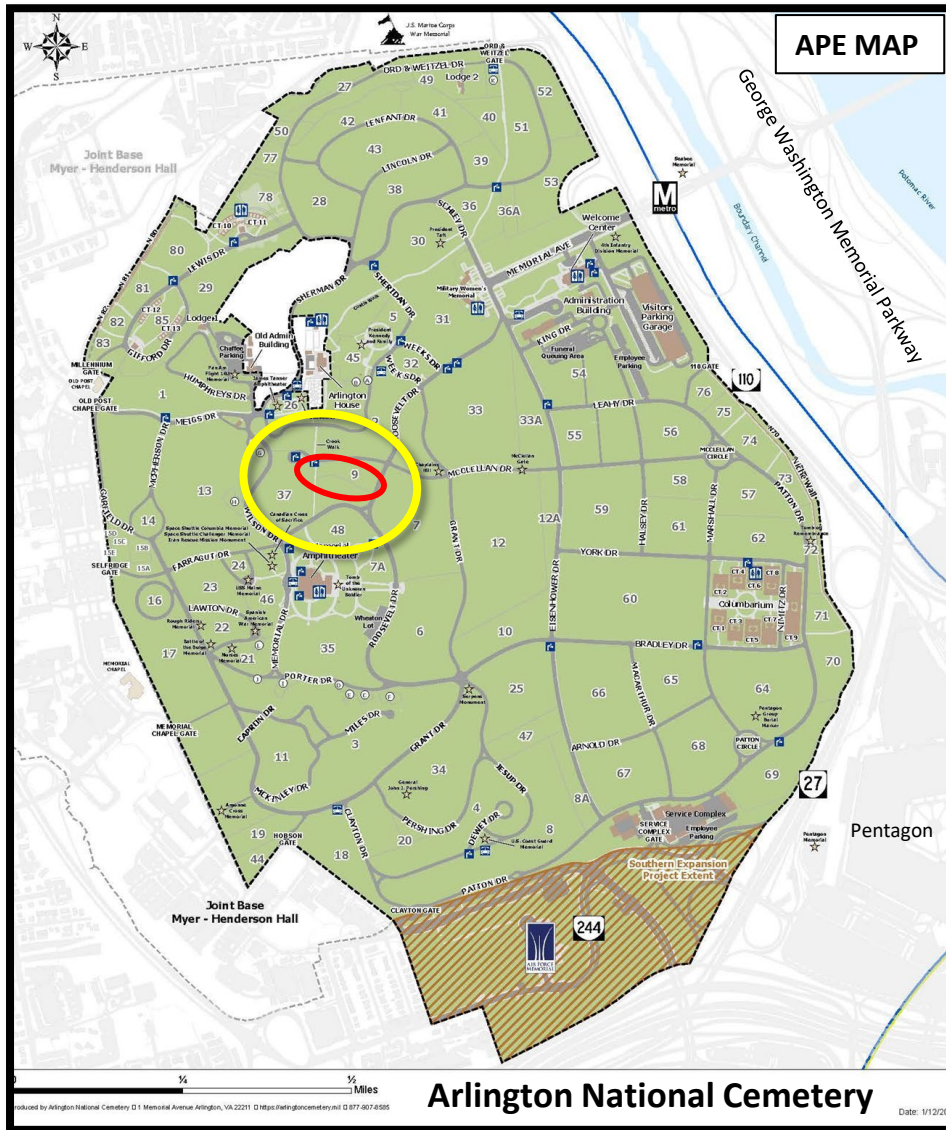
### *Map of Project Areas*

APE outlined in **YELLOW**

Proposed project locations in **RED**



# IDENTIFICATION OF HISTORIC PROPERTIES



## Historic Properties within the APE

Per 36 CFR § 800.4, the following is a list of historic structures and features contributing to the ANC historic district, which are located within / adjacent to the APE. These are identified in the 2014 programmatic agreement with the Virginia SHPO and the Advisory Council on Historic Preservation (ACHP), ANC's 2012 DHR Reconnaissance Level Survey and 2014 National Register nomination form.

- Arlington National Cemetery Historic District (DHR #000-0042)
- Headstones and Grave Markers (DHR #000-0042-0021)
- Memorial Amphitheater (DHR #000-0042-0006)
- Old Amphitheater (DHR #000-0042-0015)
- Red Spring (DHR #000-0042-0018)
- Tomb of the Civil War Unknowns (DHR #000-0042-0028)
- Crook Walk
- Footbridges, Crook Walk
- Road System, West of Eisenhower
- Drainage Ditches and Culverts, West of Eisenhower, ca. 1890s-1950s
- Drainage Ditches and Culverts, West of Eisenhower, Post-1966

## National Register Historic Properties within the APE:

The following is a list of historic properties on, or eligible for listing on, the National Register of Historic Places (IAW 36 CFR part 63) within the APE:

- Arlington National Cemetery Historic District (DHR #000-0042)  
<https://www.dhr.virginia.gov/historic-registers/000-0042/>

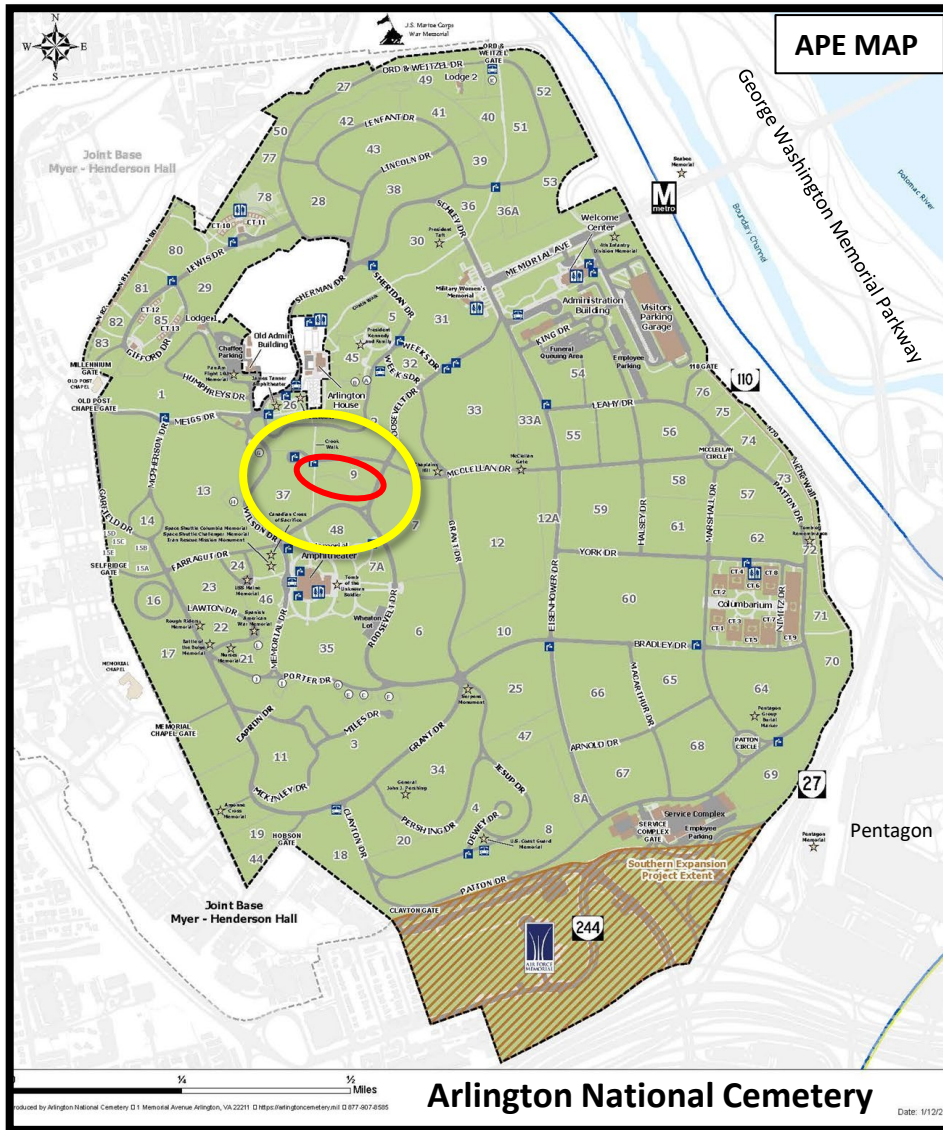
## AREA OF POTENTIAL EFFECTS MAP

 APE outlined in **YELLOW**.

 Proposed project location in **RED**.



# IDENTIFICATION OF HISTORIC PROPERTIES





## Results of Identification & Evaluation:

### Historic Properties Affected

Per 36 CFR § 800.4(d)(2), ANMC found that there are historic properties which may be affected by the undertaking. As a result, ANMC will notify the DHR, potential consulting parties, including Indian tribes or organizations, and the public, inviting their views on:

1. The agency's finding that there is an undertaking that affects historic properties;
2. The agency's identification agency's identification of historic properties;
3. The agency's identification of the area of potential effects (APE);
4. The agency's assessment of no adverse effects to historic properties.

### AREA OF POTENTIAL EFFECTS MAP

-  APE outlined in **YELLOW**.
-  Proposed project location in **RED**.



## Assessment of Adverse Effects

By applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the proposed undertaking – the proposed reconstruction and rehabilitation project for Crook Walk bridge, the Section 37 stormwater channel, and associated drainageways – will result in **no adverse effects to historic properties** listed on the National Register within and adjacent to the undertaking's APE:

- Arlington National Cemetery Historic District (000-0042)

The project design avoids and/or minimizes the direct, indirect, and cumulative effects to above- and below- ground historic properties and contributing elements in the undertaking's APE. There will be no adverse effects to the integrity of the historic property that would diminish its historical and architectural significance. There are no adverse impacts to the characteristics that qualify the historic property for inclusion in or eligibility for the National Register of Historic Places (NRHP).

The site will continue to convey its historic significance for both landscape architecture and architecture, maintain its association with military history and the evolving views regarding the commemoration and memorialization of US military history, preserve its exceptional collection of gravestones and monuments that collectively represent mortuary practices from the mid-nineteenth century, and maintain its association as the final burial place of many people who made outstanding contributions to our country's history. There are no changes to the integrity of location, workmanship, feeling or associations for the National Register historic district.

The project preserves the historic land uses while extending the life of structures and landscape elements. The proposed project selects materials and methods in a manner to avoid and minimize effects. Surface finishes will match the original design intent and unify the individual concrete elements. Where possible, original features, like the brick and granite channels and the base of the Crook Walk bridge will be rehabilitated. The proposed rehabilitation work is consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68). Construction work will occur within the existing footprint of the channel and the 10-foot surrounding, which are previously disturbed grounds. As a result, the design avoids and/ or minimizes the direct, indirect, and cumulative effects to above- and below-ground historic properties and contributing elements in the Arlington National Cemetery Historic District.

While there would be landscape changes in the area immediately surrounding the realignment and the reconstruction project, the historic ANC property retains its historic views and vistas. The landscape is a contributing feature of the ANC Historic District, but the proposed landscape impacts would not rise to the level of adverse effect(s). The only anticipated regrading is immediately adjacent the channel and the footings for the Crook Walk bridge. The character-defining winding channel and rural / picturesque cemetery design are preserved. Without the project, the channel would continue to deteriorate, and risks being lost or replaced with a covered or buried stormwater channel. The project will protect in place as many trees as possible. Of the two trees to be removed and replaced, one is an invasive Tree-of-heaven. ANC's horticulture program has determined that both trees removed will be replanted in more suitable locations, however the Tree-of-heaven will be replaced with a non-invasive species.



## Assessment of Adverse Effects

Most of the proposed undertaking occurs within an already-disturbed footprint – the soils were disturbed by the construction of paved pathways such as McClellan, Roosevelt and Wilson Drives, Crook Walk and the use of Sections 37 and 9 for burial space. Previous construction of the drainageways and channeling a natural stream would have required ground disturbing activities in and around the channel. As noted previously, proposed new construction work will be confined to the existing footprint of the channel and the 10-feet surrounding. Surrounding trees and grave markers will be protected in place. The proposed project design avoids and/ or minimizes the direct, indirect, and cumulative effects to above- and below-ground historic properties and contributing elements in the Arlington National Cemetery Historic District. As such, it is ANMC’s finding that the proposed undertaking would have **no adverse effect to archaeological resources**.

No known archaeological sites are within the proposed project’s limits of disturbance (LOD). As illustrated in the 2025 report, “Arlington National Cemetery Archaeological Resources and Areas of Archaeological Potential,” prepared by Marstel-Day LLC and WSP USA Solutions Inc., the proposed project’s LOD has low archaeological potential. The assessment report combined archaeological potential findings with information about ground disturbance related to the construction of buildings and infrastructure to determine that the area within the proposed project’s LOD also has low archaeological sensitivity. As a result, no Phase I or Phase II archaeological surveys, as defined in the Virginia Department of Historic Resources Guidelines for Cultural Resource Surveys in Virginia, are recommended for this proposed project. It is assumed there is a high degree of disturbance from previous construction activities around the channel, drainageways, storm drains, pathways, roads, and bridges. The report does not recommend any archaeological surveys in the proposed project area.

All projects contracted within ANC conform with the “Programmatic Agreement Among Arlington National Cemetery, the Virginia State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Operation, Maintenance, and Repair Activities at Arlington National Cemetery,” which requires the provisions of Stipulation VII to be included in all ANC operations and contracts involving ground disturbance. Stipulation VII provides standard procedures for post review discovery of cultural resources or unanticipated effects, and unidentified human remains dating prior to the establishment of Arlington National Cemetery. In the event of an unanticipated discovery, all work would cease, and the ANMC Cultural Resources Manager (CRM) would be contacted. The CRM would notify the Virginia Department of Historic Resources, and other appropriate agencies, and standard procedures would be followed to protect the artifacts and determine their significance.

In accordance with Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, and its implementing regulations, 36 C.F.R. Part 800, ANMC invites comments from the Virginia Department of Historic Resources, consulting parties, and the public.

Caitlin Smith, AIC PA  
Cultural Resources Program Manager  
Army National Military Cemeteries



## AGENCY REQUEST FOR RESPONSE TO FINDINGS



View of the Section 37 stormwater drainage channel looking east, away from the Crook Walk bridge

ANMC requests that the DHR:

1. Respond to ANMC's request for review of finding of effect on historic properties.
2. Provide concurrence or comments on the identified potential consulting parties.
3. Provide concurrence or comments on the determined APE.
4. Provide concurrence or comments on the identified historic properties.
5. Respond to ANMC's findings of:
  - a) No adverse effects to the Arlington National Cemetery Historic District (000-0042).
  - b) No adverse effects to archaeological sites.

In support of this request, ANMC submits the following documents to the DHR:

- Electronic Project Information Exchange (ePIX) system submission
- Section 106 Initiation Letter
- Section 106 Documentation: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects
- "Arlington National Cemetery Archaeological Resources and Areas of Archaeological Potential" report prepared by Marstel-Day LLC and WSP USA Solutions Inc., June 4, 2025



Public tour of the Arlington National Cemetery Memorial Arboretum, Arlington, Virginia, Fall 2024

Concurrent with this submission, ANMC sends notifications to consulting parties and the public of the initiation of a 30-day comment period. The notices and Section 106 documentation are posted on the ANC website:

<https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices>

This submission to potential consulting parties and the public includes:

- Section 106 Initiation Letter
- Section 106 Process Submission: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects
- Consulting Party Notification Letter
- Public Notification Letter



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Please Direct Questions & Comments to

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