



**DEPARTMENT OF THE ARMY**  
ARMY NATIONAL MILITARY CEMETERIES  
ARLINGTON NATIONAL CEMETERY  
ARLINGTON, VIRGINIA 22211-5003

April 14, 2025

**SUBJECT:** National Historic Preservation Act (NHPA) Section 106, Continued Consultation for Proposed Entry Corridor Area Improvements, at Arlington National Cemetery, Arlington, Virginia

Dear Consulting Party:

Army National Military Cemeteries (ANMC) is writing to continue consultation with you/your organization in accordance with Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. § 470f), and its implementing regulations, 36 C.F.R. Part 800, for a proposed project at Arlington National Cemetery (ANC) located in Arlington, Virginia. 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). The proposed undertaking includes a number of improvements to the Entry Corridor Area at ANC (Enclosures 2 and 3).

On October 4, 2024, ANMC initiated consultations with the Virginia State Historic Preservation Officer (SHPO), federal, state, tribal, and local agencies, along with interested consulting parties, on the proposed undertaking. This coincided with the start of the National Environmental Policy Act (NEPA) scoping process and preparation of an Environmental Assessment (EA). ANMC invited consulting parties to attend a Public Scoping Meeting held on October 16, 2024. Public and consulting party comments provided during the 30-day scoping period helped inform the development of the proposed undertaking's design, the EA, and the Section 106 findings. A complete list of invited consulting parties can be found in Enclosure 1.

Project Background:

ANC is our nation's most hallowed ground. The cemetery consists of approximately 639 acres and is the final resting place of over 400,000 eligible veterans, active-duty service members, and their families. The cemetery receives millions of visitors each year, including visits from the President of the United States, other dignitaries, family members of the deceased, and millions of visitors from around the world. More than 6,500 funerals are conducted yearly at ANC. Additionally, up to 3,000 other ceremonies occur regularly, such as: commemorations, dedication/wreath ceremonies, and dignitary visits. ANC's mission is to honor the sacrifices of American service members and their families for generations to come.

The "Entry Corridor Area", is located in the northeast section of the cemetery and serves as the primary visitor and ceremonial entrance to ANC. It includes significant facilities

such as the Welcome Center, Public Parking Garage, Administration Building, Military Women's Memorial, and various support areas. Covering approximately 35 acres, this area is pivotal for managing the high volume of visitors and ceremonial activities. The proposed improvements would address various operational challenges and enhance the experience for visitors, funeral attendees, and staff.

#### The Proposed Undertaking:

The proposed action includes the redevelopment of the ANC entry corridor, to include improvements to Memorial Avenue, parking garage reconfiguration, a pedestrian screening facility and arrivals plaza, a new Welcome Center and central plaza, interpretive gardens, amphitheater, gathering space, and new columbaria and in-ground burials. The new Welcome Center would be roughly the same size as the existing Welcome Center (approximately 33,200 square feet). The proposed 33,200 square foot Welcome Center would be constructed adjacent to the existing Welcome Center, which is proposed for demolition. The Welcome Center will be constructed to a height of approximately 38 feet and developed to generally match the surrounding architecture and style consistent with ANC. A feasibility study for the proposed undertaking has been completed, but formal design has not yet started.

The primary objectives of the proposed undertaking include:

- Increasing Burial Capacity
- Security Improvements
- Improving Transportation and Pedestrian Circulation, and Wayfinding
- Improving Both the Welcome Center and Overall Visitor Experience

#### Discussion of the Area of Potential Effect (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 project APE is outlined in Enclosure 3.

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. DHR guidelines recommend that the APE includes:

- all locations where the project will cause ground disturbance (the limits of disturbance (LOD) for the proposed undertaking);

- all locations from which the project may be visible or audible (e.g., construction activities, new buildings, landscape features, and structures); 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 National Register Historic District (Virginia Department of Historic Resources [VDHR] #000-0042) and at the western terminus of the Arlington Memorial Bridge and related features (VDHR #000-0014). Resources that fall within the LOD include Memorial Avenue, Flex Space North, Flex Space South, the Welcome Center, the Tram Loop, and the Parking Garage (Enclosure 3).

A viewshed study has been completed by ANMC to assist in better identifying the extent and impact of the visual APE. As the tallest structure proposed for the redevelopment project, the new Welcome Center is the focal point of this viewshed analysis. Approximately 12 viewsheds were identified and analyzed as part of the Feasibility Study. Renderings in the study demonstrate the undertaking's negligible visual impact on the viewsheds contributing to the National Register eligibility of both the Arlington Memorial Bridge and Arlington National Cemetery. The viewshed study is enclosed for your review and comment (Enclosure 4).

During construction, temporary sound and visual effects are expected within 100 yards of the project area. In addition, there will be temporary, localized impacts to traffic patterns in the cemetery, and along Memorial Avenue and Route 110.

The undertaking also involves ground disturbing activities in areas of prior disturbance.

#### Identification of Historic Properties & Evaluation:

The proposed project falls within the boundaries of two historic properties on the National Register, the Arlington National Cemetery Historic District and the Arlington Memorial Bridge. ANC was listed on the National Register under Criteria A, B, and C: under Criterion A for the "commemoration of our nation's military;" under Criterion B for graves of important people that relate to the history of the country or region; and under Criterion C as a cemetery that reflects the "design characteristics associated with the picturesque/rural cemetery movements or the establishment of national cemeteries" and more specifically, design elements that reflect the influence of the McMillan Plan, the Commission of Fine Arts, and/or the City Beautiful Movement. For more information, see Enclosure 2.

Per 36 CFR § 800.4, the following is a list of historic structures and features contributing to the historic properties on the National Register: ANC and Arlington Memorial Bridge. These historic structures and character-defining features are located within / adjacent to the APE. These are identified in the 2025 programmatic agreement among ANC, the Virginia SHPO, and the Advisory Council on Historic Preservation (ACHP), ANC's 2014 National Register nomination, and ANC's 2012 DHR Reconnaissance Level Surveys.

- Arlington National Cemetery Historic District (DHR #000-0042)
- Superintendent's House, Lodge #1 (DHR # 000-0042-0001)
- Administration Building (DHR #000-0042-0007)
- Visitors Center / Welcome Center (DHR #000-0042-0014)
- Boundary walls and gates (DHR #000-0042-0017)
- Tour Bus Shelter (DHR #000-0042-0020)
- Grave Markers (DHR #000-0042-0021)
- McClellan Gate (DHR #000-0042-0022)
- Chaplains Monument (DHR #000-0042-0027)
- Field Marshall Sir John Dill Monument (DHR #000-1242 & #000-0042-0030)
- Kennedy Gravesites (DHR #000-0042-0033)
- Robert Todd Lincoln and Mary Harlan Lincoln Monument (DHR #000-0042-0035)
- John Wingate Weeks Monument (DHR #000-0042-0050)
- President William Howard Taft Monument (DHR #000-0042-0051)
- Arlington House Historic District (DHR # 000-0001)
- Arlington House Cultural Landscape (CLI #600049)
- Arlington Hemicycle / Military Women's Memorial
- 101<sup>st</sup> Airborne Division Memorial
- Rear Admiral Byrd Memorial
- Armored Forces Memorial
- 4<sup>th</sup> (Ivy) Infantry Division Memorial
- United Spanish War Veterans Memorial
- Seabees Memorial

Per 36 CFR § 800.4(d)(2), the agency finds that there are historic properties which may be affected by the undertaking.

#### Assessment of Effects Findings & Determination:

ANMC has carefully considered ways to avoid or minimize potential adverse effects to historic properties for the proposed undertaking. The project is currently in the feasibility and concept design phase. An environmental assessment (EA) of the proposed undertaking is underway to determine if the project could cause significant impacts to the human or natural environment. The EA is intended to assist agency planning and decision-making. The EA discusses and documents environmental impacts, develops alternatives, identifies mitigation measures, and provides for public and agency participation. If, after completing the EA, the agency decides to move forward with the proposed undertaking and contract an architecture and engineering (A/E) firm to develop the designs, the consulting parties will be invited to review and provide comments to help ensure they preserve the character of the historic districts.

Construction and operation of the proposed entry corridor improvements will have direct and indirect impacts on the aforementioned historic properties. The roadways immediately surrounding the site will be temporarily impacted by construction. There will also be temporary noise and visual impacts during construction. There are no long-term impacts, however, to land use or public access, as the project area for the proposed

undertaking is within the grounds of a government facility, and the proposed facilities replace or expand capacity of existing facilities currently performing the same functions. New columbaria are proposed in turfed areas adjacent to active burial sections, a compatible use consistent with the character of the surrounding landscape. The proposed project maintains a separation of general visitor services, burial services, and government operations. It preserves character-defining viewsheds, structures, and landscapes. There will be no adverse effects to the integrity of the historic properties that would diminish their historical and architectural significance. There are no adverse impacts to the characteristics that qualify the historic properties for inclusion in or eligibility for the National Register of Historic Places (NRHP).

*Memorial Avenue, Arlington Memorial Bridge, and the Hemicycle:* The sight line, design, and landscape features of Memorial Ave. are contributing elements of the National Register listed ANC Historic District and Arlington Memorial Bridge. The proposed undertaking has been carefully developed to ensure nothing obstructs sightlines down Memorial Ave. For example, the height of the new columbaria north of Memorial Ave. and the new Welcome Center will be restricted behind the holly hedges, ensuring they are largely obstructed from view along Memorial Ave. or the bridge. The tops of some new structures may be visible from the roof of the Hemicycle (also known as the Military Women's Memorial); however, the addition of new oak trees and plantings will minimize these effects. Special care will be given to preserve the extant holly hedges and white oak trees, contributing and character defining features of the historic properties, that bound either side of Memorial Ave. Selective removals would only occur where necessary to improve safety, security, and circulation (for pedestrians and vehicles). The proposed undertaking, however, is expected to result in net positive improvements to the landscape. Through the decades, construction of Highway 110 in the 1940s and the ANC Welcome Center in the 1980s resulted in the removal or loss of oak trees along the avenue. The project proposes restoring the hedgerow in selective locations and adding new trees to reestablish the double row of white oaks called for in the McMillan Plan and designs by McKim, Mead, and White.

*Welcome Center and Parking Deck:* The undertaking includes the demolition of the present-day Welcome Center and improvements to the adjacent parking deck. The present-day Welcome Center and adjacent parking deck were completed in 1988 and are non-contributing elements of the ANC Historic District. Views of both are largely obscured within the cemetery and from the bridge by existing and proposed landscaping.

*Administration Building:* The International Style Administration Building was built ca. 1975, in line with the 1968 master plan by Keyes, Lethbridge & Condon Architects, and is a contributing element of the ANC Historic District. Its setting dramatically changed when the adjacent Welcome Center and parking deck were constructed in 1988. The proposed undertaking would result in temporary visual and sound impacts during construction, and long-term changes to the viewshed. Proposed landscape improvements include relocating the Welcome Center and adding plantings as vegetative screening between the Administration Building and visitor service areas. As a result, there are improvements to the viewshed and a restoration of the pastoral landscape

around the Administration Building.

*Archaeological Resources:* No known archaeological sites are within the project LOD. In 2024-2025, an assessment of ANC's archaeological resources and areas of archaeological potential found that the project's LOD has low archaeological potential, except for areas around the ANC boundary that have low-medium archaeological potential. The assessment then combined these archaeological potential findings with information about ground disturbance related to the construction of buildings and infrastructure to determine that the area within the project's LOD 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 especially around the Welcome Center, utility corridors, roadways, and the parking deck. 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.

Based on the results of the viewshed study, scope of the project, and by applying the criteria of adverse effects (36 C.F.R. § 800.5[a][1]), ANMC finds that the proposed undertaking for entry corridor area improvements will result in no adverse effects to historic properties listed on the National Register within and adjacent to the undertaking's APE and is seeking your concurrence with this finding.

Section 106 Consulting Parties Meeting:

ANMC invites you and/or your organization to participate in a virtual consulting parties meeting to review the undertaking and answer any questions you may have.

Date: Thursday, May 1, 2025  
Time: 4:00 PM EST  
Location: Virtual Meeting

A Teams Meeting invitation will be transmitted to all invited consulting parties. If you would prefer to attend the meeting in-person, we are happy to host you at the ANC Welcome Center upon request.

The project documents and all consulting party meeting materials will be available for review at ANC's Welcome Center and at the following website:

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

This consulting party notification marks the start of a 30-day review and comment period, running from April 14 - May 14, 2025. During this 30-day period, the agency seeks consulting party input to inform the NHPA Section 106 and NEPA EA processes. Your input as a consulting party is integral to this process.

ANMC believes the proposed undertaking will expand burial capacity and greatly improve the visitor experience at these hallowed grounds for years to come. Questions and comments on the identification of historic properties, the APE, viewshed study, and effects determination may be directed to Caitlin Smith, ANMC Cultural Resources Program Manager, [usarmy.pentagon.hqda-anc-osa.mbx.cultural-resources@army.mil](mailto:usarmy.pentagon.hqda-anc-osa.mbx.cultural-resources@army.mil). Please include "Entry Corridor Area Improvements" in the subject line. Comments are due no later than May 14, 2025. Thank you for your support.

Respectfully,

*Caitlin E. Smith*

Caitlin Smith, AIC PA

Cultural Resources Program Manager  
Army National Military Cemeteries

Enclosures:

1. List of Invited Consulting Parties
2. Selected Project Background Information
3. Proposed Undertaking Location and Early Concept Images
4. Viewshed Study and Impact Assessment

**List of Invited Consulting Parties**

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 Virginia SHPO.

ANMC identified the following other consulting parties:

- Advisory Committee on Arlington National Cemetery (ACANC)
- Advisory Council on Historic Preservation (ACHP)
- American Legion: Dorie Miller VA Post 194
- American Legion: General Billy Mitchell VA Post 85
- American Legion: VA Post 139
- American Legion: VA Post 46
- Arlington County Department of Environmental Services
- Arlington County Historic Preservation Program
- Arlington County Historical Affairs and Landmark Review Board
- Arlington Historical Society
- Arlington House Family Circle
- Arlington Ridge Civic Association
- Aurora Highlands Civic Association
- Catawba Indian Nation
- Chickahominy Indian Tribe - Eastern Division
- Delaware Nation, Oklahoma
- District of Columbia's Historic Preservation Office
- Dominion Energy
- Environmental Protection Agency (EPA), Region 3
- Federal Highway Administration
- Foxcroft Heights Neighborhood Association
- Historical Society of D.C.
- Joint Base Myer-Henderson Hall (JBM-HH)
- Metropolitan Washington Council of Governments (MWCOG)
- Military Women's Memorial (MWM)
- Monacan Indian Nation
- Nansemond Indian Nation

- Enclosure 1-

- National Association of American Veterans, Inc.
- National Capital Planning Commission
- National Park Service (NPS), George Washington Memorial Parkway (GWMP)
- National Park Service (NPS), National Capital Region (NCR)
- National Park Service (NPS) National Historic Landmark Program
- National Trust for Historic Preservation
- Pamunkey Indian Tribe
- Preservation Virginia
- Rappahannock Tribe, Inc.
- Shared Mobility Arlington
- Society for History in the Federal Government
- The Black Heritage Museum of Arlington
- The Guild of Professional Tour Guides of Washington, DC
- Upper Mattaponi Tribe
- U.S. Commission of Fine Arts (CFA)
- U.S. Fish and Wildlife Service
- Veterans of Foreign Wars
- Virginia Department of Environmental Quality (VDEQ)
- Virginia Department of Historic Resources (DHR)
- Virginia Department of Transportation (VDOT)
- Washington Headquarters Services (WHS)
- Washington Metropolitan Area Transit Authority (WMATA)

**Selected Project Background Information**

Arlington National Cemetery Historic District National Register Nomination:

<https://www.dhr.virginia.gov/historic-registers/000-0042/>

Arlington Memorial Bridge and related features National Register Nomination:

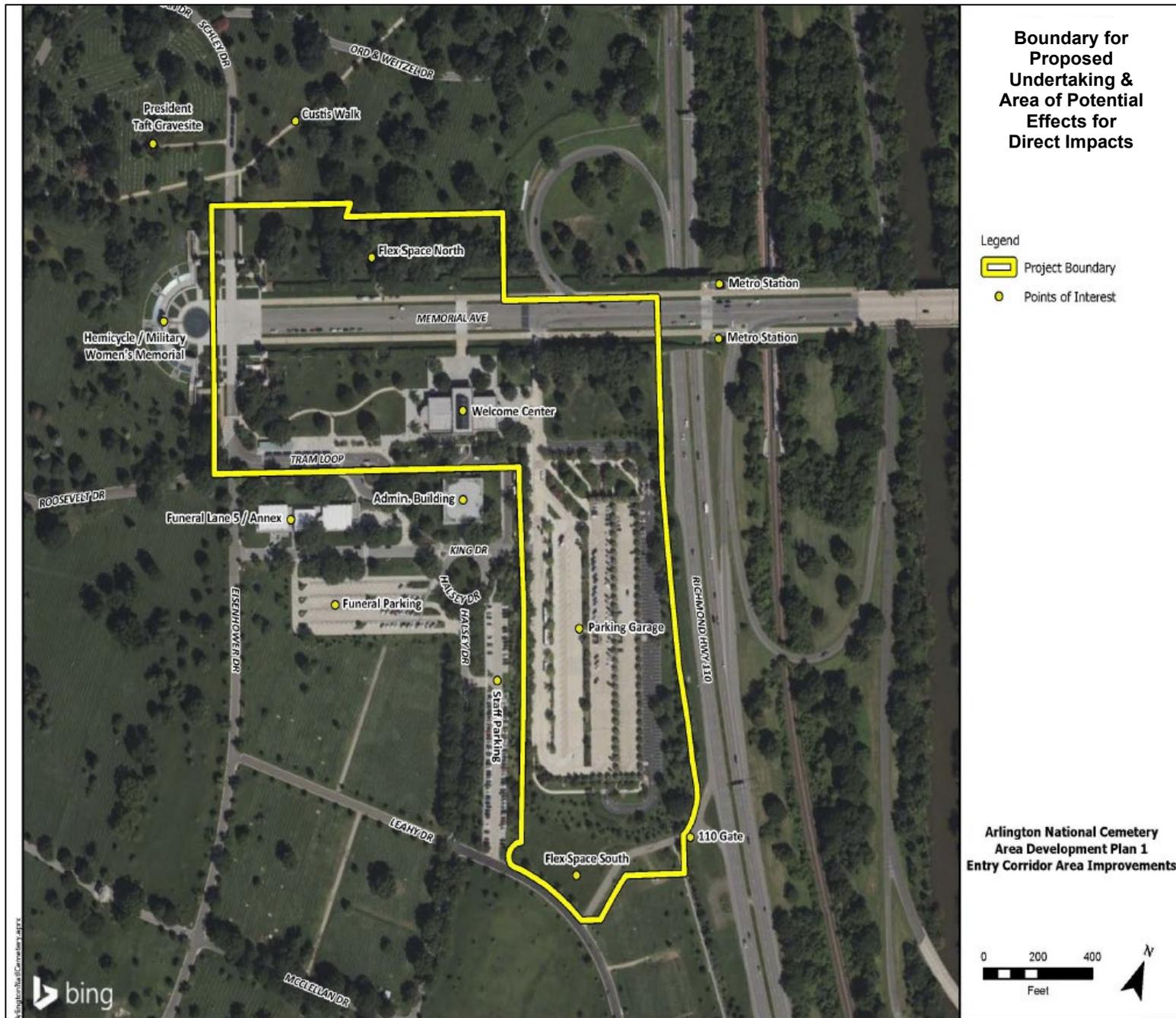
<https://www.dhr.virginia.gov/historic-registers/000-0014/>

Information about Section 106 of the National Historic Preservation Act (NHPA):

<https://www.achp.gov/protecting-historic-properties>

Information about the ongoing compliance process for the Entry Corridor Area Improvements project can be found on the ANC Public Notices page:

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





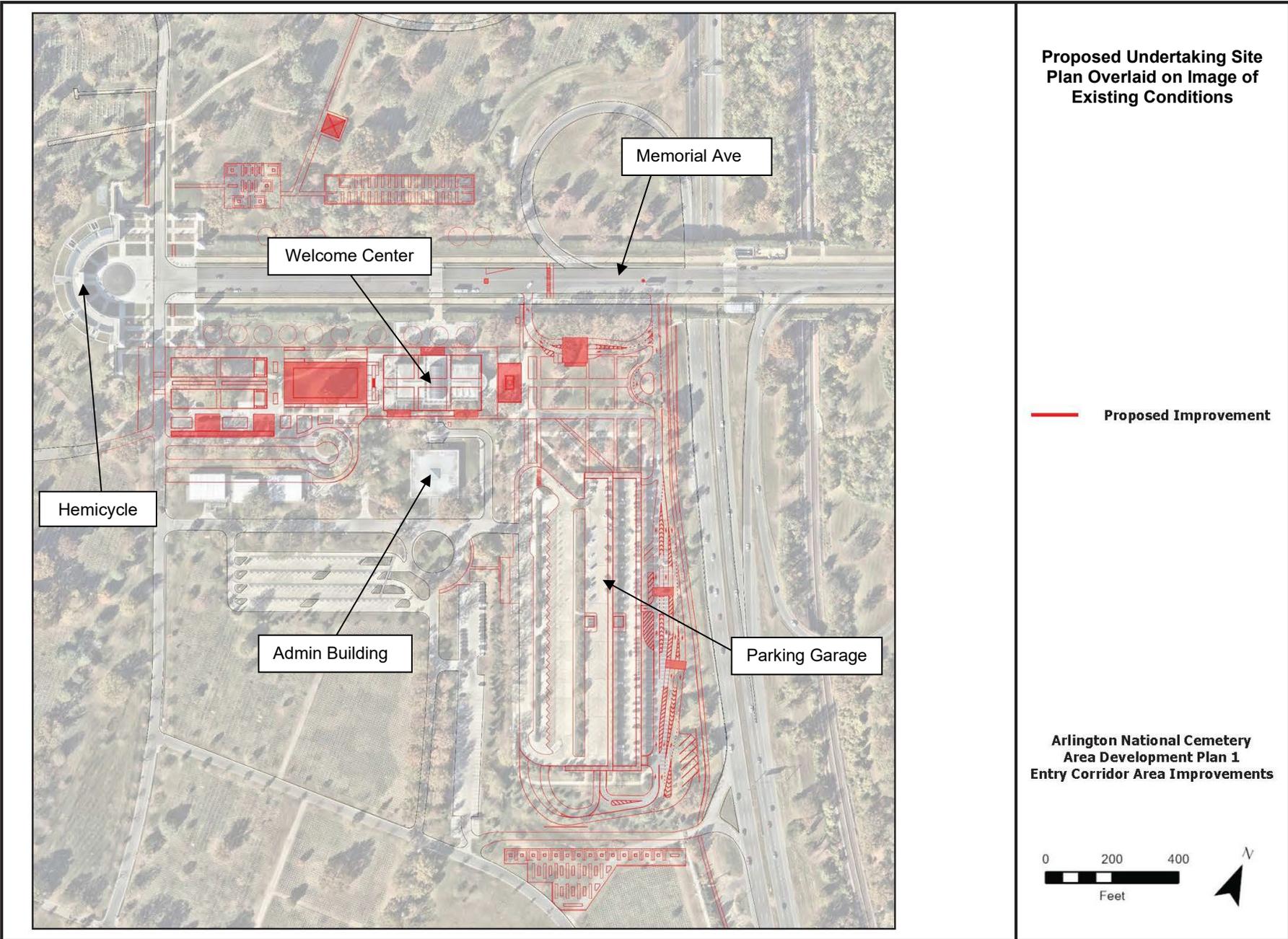
**LEGEND:**

1. NEW ENTRANCE DRIVE
2. VCS STATION
3. FUNERAL SCREENING LANE / ALTERNATIVE BUS DROP-OFF
4. FUNERAL SCREENING
5. GUARD HOUSE AT FUNERAL LOOP
6. RIDESHARE LOOP
7. ARLINGTON MEMORIAL TRAIL
8. STAFF PARKING ENTRANCE
9. VEHICLE SECURITY SCREENING / TICKETING
10. TICKETING / EXIT BOOTH
11. BUS OVERFLOW PARKING
12. ARRIVALS PLAZA
13. BICYCLE RACK
14. EXISTING CURB AND HEDGE ROW CUT
15. AFTER HOURS EXIT TURNSTILE
16. PEDESTRIAN SCREENING FACILITY
17. CENTRAL PLAZA / PARTERRE
18. WELCOME CENTER
19. RESTROOMS
20. TRAM TICKETING OFFICE
21. TRAM SHELTER
22. INTERPRETIVE GARDEN
23. PEDESTRIAN CROSSWALK & SIGNAGE WALL
24. SIDEWALK TO PRESIDENT TAFT GRAVESITE
25. CONNECTING SIDEWALK TO NORTH FLEX COLUMBARIA
26. COLUMBARIA - NORTH FLEX SPACE
27. SIDEWALK EXTENSION
28. EXISTING BIKE SHARE AREA
29. EXISTING ARLINGTON MEMORIAL TRAIL
30. PERIMETER FENCE
31. RETAINING WALL
32. REALIGNED HWY 110 ACCESS ROAD
33. COLUMBARIA - SOUTH FLEX SPACE
34. LANDSCAPE BUFFER
35. CENTRAL PLAZA / PARTERRE SHADING STRUCTURE
36. BACK OF HOUSE / NEW WELCOME CENTER CHILLER
37. NEW ADMINISTRATION CHILLER
38. PEDESTRIAN & BICYCLE CROSSWALK
39. UTILITY CORRIDOR
40. COMMITMENT SHELTER & SIDEWALK FROM ORD & WEITZEL DR TO COLUMBARIA
41. SHIFTED INTERSECTION OF ROOSEVELT DR AND EISENHOWER DR
42. GRANITE PAVEMENT LANE NARROWING AT GUARD TRAILER

**Proposed Undertaking  
Site Plan Illustration**

**Arlington National Cemetery  
Area Development Plan 1  
Entry Corridor Area Improvements**





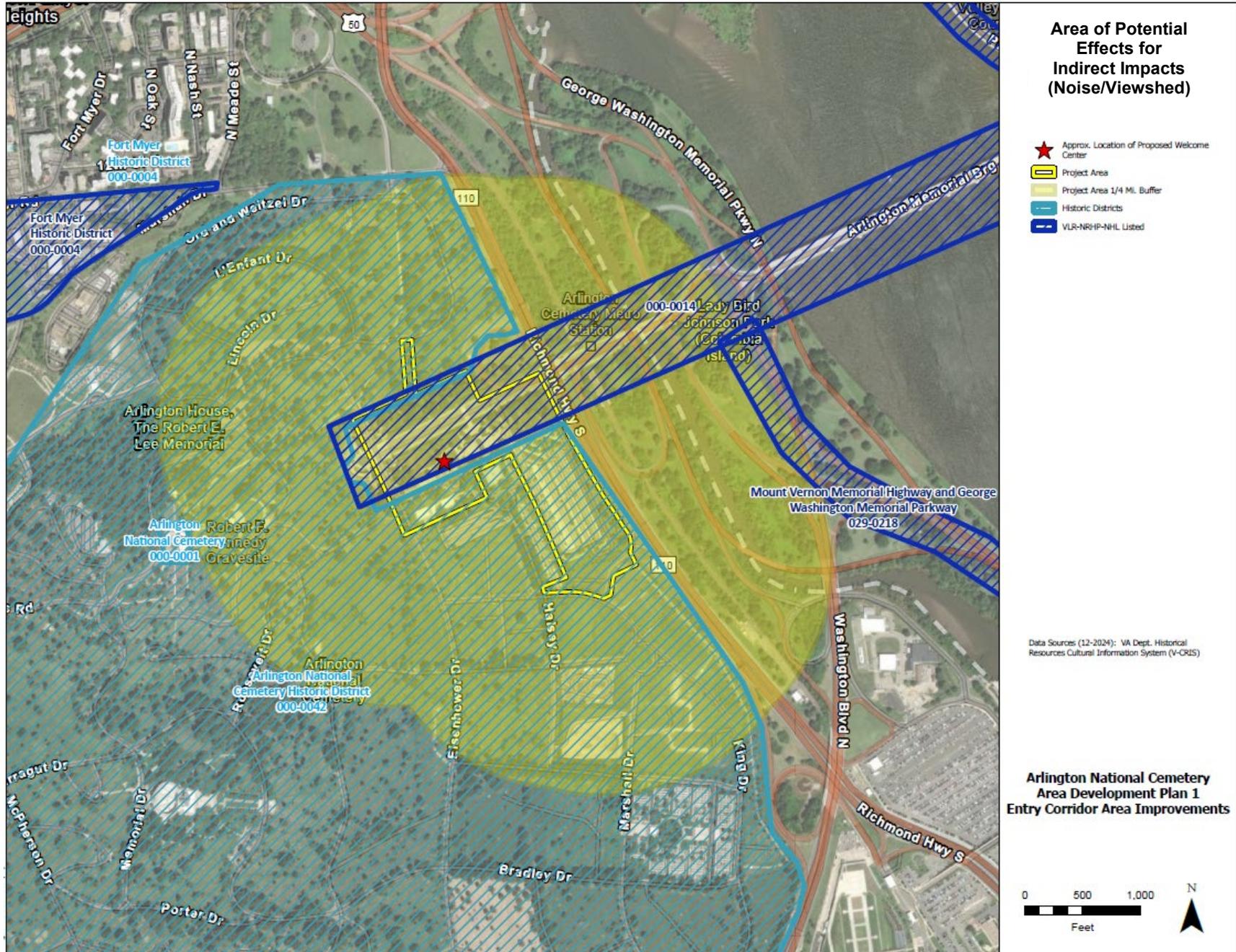
**Proposed Undertaking Site Plan Overlaid on Image of Existing Conditions**

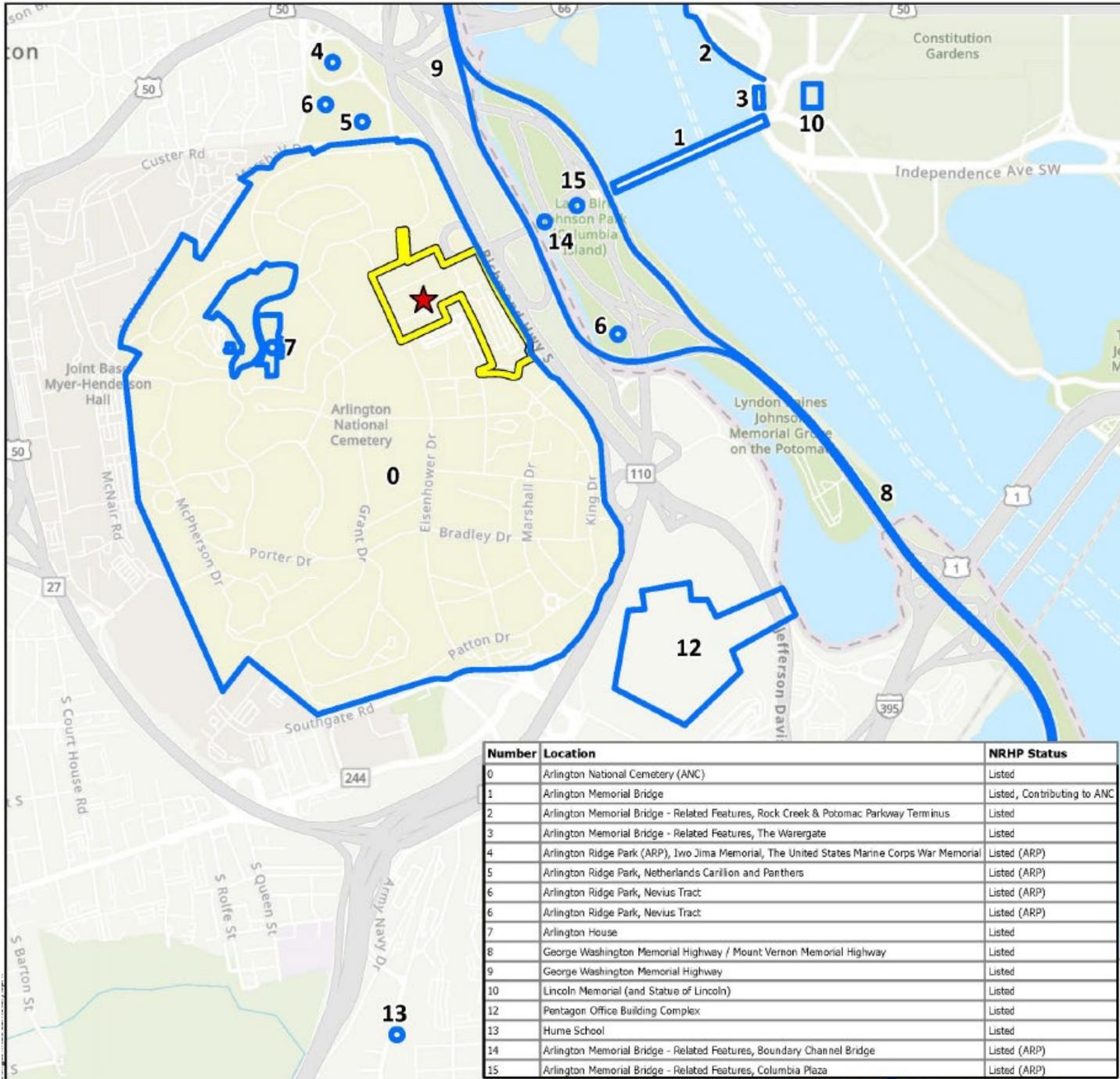
**Proposed Improvement**

**Arlington National Cemetery  
Area Development Plan 1  
Entry Corridor Area Improvements**

0 200 400  
Feet







**Historic Resources in the Inward Visibility Area**

- Approx. Location of Proposed Welcome Center
- Project Area
- Historic Resources

Data Sources (11/2024): Arlington County GIS, Open Data DC, Esri

Number	Location	NRHP Status
0	Arlington National Cemetery (ANC)	Listed
1	Arlington Memorial Bridge	Listed, Contributing to ANC
2	Arlington Memorial Bridge - Related Features, Rock Creek & Potomac Parkway Terminus	Listed
3	Arlington Memorial Bridge - Related Features, The Waregate	Listed
4	Arlington Ridge Park (ARP), Iwo Jima Memorial, The United States Marine Corps War Memorial	Listed (ARP)
5	Arlington Ridge Park, Netherlands Carillon and Panthers	Listed (ARP)
6	Arlington Ridge Park, Nevius Tract	Listed (ARP)
6	Arlington Ridge Park, Nevius Tract	Listed (ARP)
7	Arlington House	Listed
8	George Washington Memorial Highway / Mount Vernon Memorial Highway	Listed
9	George Washington Memorial Highway	Listed
10	Lincoln Memorial (and Statue of Lincoln)	Listed
12	Pentagon Office Building Complex	Listed
13	Hume School	Listed
14	Arlington Memorial Bridge - Related Features, Boundary Channel Bridge	Listed (ARP)
15	Arlington Memorial Bridge - Related Features, Columbia Plaza	Listed (ARP)

**Arlington National Cemetery Area Development Plan 1 Entry Corridor Area Improvements**

