



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

July 22, 2024

SUBJECT: National Historic Preservation Act Section 106 for the Wi-Fi CSN
Conveyance and Cabling Phase II Project on the Grounds of Arlington
National Cemetery, Arlington, Virginia (DHR Project No. 2024-4449)

Julie V. Langan
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

ATTN: Ms. Jennifer Bellville-Marion
Project Review Archaeologist
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Bellville-Marion:

Army National Military Cemeteries (ANMC) would like to take this opportunity to formally initiate the consultation process with the Virginia Department of Historic Resources (DHR) 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 proposes expanding wireless (Wi-Fi) network access to burial sections throughout Arlington National Cemetery (ANC), concentrating on coverage in areas of active cemetery operations. Phase II of this project focuses on the northernmost sections of ANC. The proposed project is considered a federal undertaking with the potential to cause adverse effects on historic properties pursuant to 36 C.F.R. 800.3(a).

The project includes installation of eighteen (18) bollard-height Wi-Fi bollards, predominantly along roadways and Custis Walk, where conveyances are accessible. All communication equipment will be installed hidden below grade. Wiring to the Wi-Fi Access Points (APs) will run inside the posts. The project also includes the addition of three (3) CSN antennas to the top of existing camera and light poles.

In addition to the bollards and antennas, the project includes boring and installation of conduits, handholes, cabling, and concrete pads. The project utilizes a combination of existing conduits and boring for new conduit. Boring and directional drilling will only occur in locations where no existing duct banks are available.

Within the project area, the contractor anticipates thirty-five (35) instances of ground disturbance at each hand hole and access point. There will be approximately 200 SF of ground disturbance at each location, for a total of 7,000 SF. Handholes shall be no more than 20-feet from each proposed pole / bollard location. The contractor will install 1½-inch PVC conduit from the handholes to each pole/ bollard location. A total of eighteen (18) bollard concrete pads will be installed. Concrete bases will be a square 18-inches by 18-inches wide, stand 2-inches proud of ground level, then extend down another 34-inches in depth.

The project is completely within Arlington National Cemetery's Historic District. The Wi-Fi antennas, bollards, and equipment are intended to blend in to and compliment the cemetery's surroundings. All bollards shall match previously installed bollards along roadway from the Welcome Center to Columbarium CSN Wi-Fi Expansion Project as well as the Millennium CSN Wi-Fi Expansion Project. Bollards set into the landscape shall be 47-inches tall and matte black, to recede into the greenspace.

Additional information regarding the project can be found in Attachment A: *Section 106 Initiation Document: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects*, and on the ANC website: <https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices>.

With this letter, ANMC notifies the DHR that, in accordance with Section 106 of the National Historic Preservation Act (NHPA), the agency has:

1. Found that the proposed undertaking affects historic properties.
2. Identified potential consulting parties.
3. Identified the historic properties.
4. Identified the area of potential effects (APE).
5. Applied the criteria of adverse effects (36 CFR § 800.5[a][1]) to the undertaking and finds that the proposed project would have no adverse effects to historic properties in the Area of Potential Effects (APE).

By way of this submission, ANMC requests that the DHR:

1. Respond to ANMC's request for review of its finding of effect on historic properties.
2. Provide concurrence or comments on the determined APE.
3. Provide concurrence or comments on the identified potential consulting parties.
4. Respond to ANMC's requests DHR's response to the agency's findings of:
 - a) No adverse effects to the Arlington National Cemetery Historic District (000-0042)
 - b) No adverse effects to the Arlington Ridge Park (DHR #000-9707)

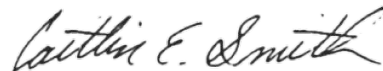
c) No adverse effects to the Arlington House Historic District (DHR # 000-0001)

Please provide DHR's comments on the agency's findings and determinations within thirty (30) days of receipt of this letter. All comments on the enclosed documents should be sent to the ANMC Cultural Resources Manager at usarmy.pentagon.hqda-anc-osa.mbx.cultural-resources@army.mil.

Concurrent with this submission, ANMC notified consulting parties and the public of the agency's findings and determinations, and 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>.

Army National Military Cemeteries looks forward to continuing the Section 106 consultation process with our agency partners, consulting parties, and the public. Thank you for your support.

Sincerely,



Caitlin E. Smith
Cultural Resources Program Manager
Engineering, Planning & Resources
Army National Military Cemeteries

Attachments:

- A Section 106 Initiation Document: Project Description, Identification of Consulting Parties, Identification of Historic Properties, Area of Potential Effects, and Assessment of Effects

Selected project background information:

Arlington National Military Cemetery Historic District National Register Nomination:

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

Arlington Ridge Park National Register Nomination:

<https://www.dhr.virginia.gov/historic-registers/000-9707/>

Arlington House Historic District National Register Nomination:

<https://www.dhr.virginia.gov/historic-registers/000-0001/>

Information about Section 106 of the National Historic Preservation Act can be found here: <https://www.achp.gov/protecting-historic-properties>

Information about the ongoing compliance process can be found on the ANC Public Notices page of the ANC website at: <https://www.arlingtoncemetery.mil/About/Policies-and-Public-Notices/Public-Notices>