National Park Service
US Department of the Interior

George Washington Memorial Parkway

DECISION RECORD

TRIUMPHAL ARCH AT MEMORIAL CIRCLE

1. DECISION

The National Park Service has completed a Revised Environmental Assessment (EA) (DOI-NPS-13697) and Revised Finding of No Significant Impact (FONSI) for the Triumphal Arch at Memorial Circle. After careful consideration of the alternatives analyzed in the EA and the conclusions reached in the FONSI, I am authorizing the proposed action, hereafter referred to as the selected action, for implementation.

The purpose of the selected action is to celebrate 250 years of American independence by honoring America's founding principles through installation of an arch at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage. The arch is not designed to perpetuate the memory of any individual, group, event or other significant element of American history. It is instead designed to symbolize the profound blessing of living in this great country, America. It symbolizes perseverance, strength, and greatness. It is a monument to the future of America. Regardless of the symbolism that any one person attaches to it, the arch will be used for the primary purpose of presenting an inspiring ceremonial gateway to Washington, D.C.

Arlington Memorial Bridge and Memorial Avenue serve as a ceremonial entrance to Washington, D.C. and the gateway to Arlington National Cemetery, physically and symbolically uniting the nation's history along a corridor already lined with monuments honoring diverse figures of American significance. Executive Order 14252, *Making the District of Columbia Safe and Beautiful*, directs the Secretary of the Interior to develop proposals to ensure Federal buildings and lands uplift and beautify public spaces and generate in the citizenry pride in and respect for our Nation, promoting beautification and the preservation of our history and heritage. Installation of an appropriate structure presents an opportunity to advance that directive within one of the most symbolically significant corridors in the Capital.

1.1. Description of the Selected Action

The selected action includes construction of an Arch within Memorial Circle, associated plaza and landscape improvements, supporting utility and stormwater infrastructure, traffic and pedestrian circulation modifications, security features, lighting, and temporary staging and laydown areas required for construction.

The Arch will be an approximately 250-foot-tall reinforced concrete structure clad in granite or marble veneer and ornamented by a central winged figure and two statues, positioned above each Arch leg. Dimensions will be finalized during future design efforts. The following dimensions are current approximations. The principal architectural component will rise approximately 166 feet above finish grade, with surmounting statuary extending the total height to approximately 250 feet. The main footprint of the structure will be approximately 108 feet by 184 feet, with a 16,380-square-foot footprint at ground level. The maximum lateral projection at the upper cornice will extend to 107 feet 4 inches by 183 feet 4 inches. The structure will contain approximately 66,524 gross square feet distributed across four levels. The observation deck will provide approximately 9,560 square feet of exterior deck area. The Arch will serve as a monumental architectural feature aligned with the axis between Memorial Avenue and the Arlington Memorial Bridge. The main body of the Arch will be 166 feet wide with a 55-foot-wide opening, providing views through the Arch to the Lincoln Memorial, Memorial Bridge, the Military Women's Memorial, and the Arlington House.

- Ground Floor Level: The ground level will contain security screening, back-of-house functions, and vertical circulation lobbies.
- Gallery/ Mezzanine Level: The gallery/mezzanine level will also contain exhibit space, back-of-house areas, restrooms, and vertical circulation lobbies, with the possibility of including a café and gift shop.
- Mechanical Level: The mechanical level will contain mechanical and support spaces.
- Observation Deck Level: The observation deck level will include the vertical circulation lobby and exterior deck.

The structure will be built from concrete and finished with a granite or marble veneer. The granite or marble veneer for the Arch will be sourced from a single quarry located in Vermont, California, or Italy selected according to availability, overall cost, and the desired color and ultimately delivered by truck to Memorial Circle.

The structure will include six stairways and five elevators. Two pairs of elevators in the north and south legs will serve the ground and gallery levels, and a fifth elevator will serve the observation deck. Two large circular spiral stairs will connect the ground level to the gallery level; two elliptical spiral stairs will connect the gallery level to the observation deck; and two egress stairs will connect all levels to dedicated exit-only doors at grade.

The selected action will also include site development within and immediately around Memorial Circle. A paved public plaza will surround the Arch inside the traffic circle. The plaza will be protected by a barricade seat wall generally located at the existing inner curb and by removable or retractable bollards at authorized vehicle access points. Exterior lighting will be installed to illuminate the Arch and plaza, and the Selected Action will include minimal exterior signage, perimeter and rooftop security cameras, access-control systems for major doors and nonpublic areas, interior and exterior video surveillance, and a security screening area with walk-through magnetometers, x-ray equipment, and explosive trace detection equipment. Vehicle access to the plaza will be restricted to authorized maintenance, contractor, law enforcement, and emergency vehicles.

Memorial Circle will be illuminated by six approximately 30-foot light poles, each equipped with eight fully shielded, low-spill luminaires. Linear lighting installed along the underside of the Arch's vault will provide illumination of the Arch walls. Sixteen luminaires on the roof deck will light the statues. The winged liberty statue will hold a sculptural torch containing a natural-gas-fueled eternal flame, which will remain continuously lit and serve as the FAA-required obstruction light for aviation safety.

Changes to Vehicle, Pedestrian, and Bicycle Use

During construction, temporary closures will be implemented. Those include:

- Westbound traffic from Arlington Memorial Bridge will be reduced to two lanes.
- Eastbound traffic from Memorial Avenue will not be able to turn northbound on Arlington Boulevard (U.S. Highway 50) and will be directed onto Arlington Memorial Bridge.
- Northbound traffic from Washington Boulevard (State Route 27) will not be permitted into the circle, but will need to turn right onto Arlington Memorial Bridge.
- The sidewalk on the south side of the Circle will be temporarily rerouted to the north side.

Additional short-term closures and detours will be required at the beginning of the project to establish the maintenance of traffic configuration, during construction to accommodate utility installations, and again near the end of construction to complete final transportation-related elements.

Under the selected action, new traffic signals will be installed to control vehicle movements within and around Memorial Circle. The signalization plan will activate pedestrian crossing phases through passive or active detection to ensure safe and efficient circulation for all users. These upgrades will replace existing yield and merge conditions with full signal control. The signalization of the eastern approaches to Memorial Circle, the addition of a new crosswalk across Arlington Memorial Bridge, and the realignment of existing crosswalks and conversion of

Rectangular Rapid Flashing Beacons (RRFBs) to fully signalized pedestrian crossings have independent utility as a separate transportation and safety project that improves pedestrian access to Memorial Circle. These improvements are included in the Selected Action because they will also enhance access and safety for visitors to the Triumphal Arch.

Signalization-related changes include the following:

- Full signalization of Memorial Circle and all pedestrian crossings
- Three signal groups at Washington Boulevard, Arlington Boulevard, and Memorial Avenue
- Eight new fully signalized pedestrian crossings with access to the center of the Circle
- Elimination of all existing yield and merge movements
- Pedestrian actuation and detection for walk phases that activate only when needed
- Dedicated signal phases for high-volume turning movements to minimize conflicts

The selected action will also include implementation of a series of physical modifications within and around Memorial Circle. These improvements will reshape roadway geometry, expand pedestrian space, and incorporate new materials and features that calm traffic and create safer conditions for people walking. Construction activities will include enlarging key median islands, possibly converting existing pavement treatments to more durable and pedestrian friendly materials, and adjusting the circulating roadway to reduce speeds and better accommodate all users. Physical construction–related changes include:

- Enlarged median islands on the east and west sides of Memorial Circle
- Circulating roadway narrowed to approximately 20 feet
- Conversion of the pavement marked truck apron to a mountable concrete truck apron
- Replacement of existing Belgian block along the outer edge of the Circle with grass

Construction phase changes, including closure of the south half of the Circle, detouring two-way traffic to the north side, elimination of certain left-turn movements, and temporary pedestrian routing with a new temporary crosswalk that is designed in compliance with the Americans with Disabilities Act (ADA) and the Architectural Barriers Act (ABA) and that meets the Public Right-of-Way Accessibility Guidelines (PROWAG) incorporated into the ABA Accessibility Standards.

The selected action will include designating a dedicated pickup and drop off area along Memorial Avenue to accommodate short-term loading and unloading and enhanced wayfinding to direct visitors toward designated safe crossings.

Construction Phasing

Construction of the Arch will occur in multiple phases over an approximately two-to-three-year period. Construction activities will generally proceed as described below, but are subject to change.

Phase 1– Mobilization (1-5 days). The initial phase will include fencing of the staging area and Memorial Circle, installation of matting and gravel and the installation of construction job site trailers.

Phase 2 – Site Excavation (2-3 months). Following mobilization, site preparation, excavation within the construction footprint, and installation of temporary utilities. Erosion and sediment control measures, stormwater management protocols, and staging areas will be established. Temporary pedestrian, bicycle and vehicle detours will be implemented.

Phase 3 – Foundation and Support of Excavation (4–5 months). Following excavation, drill rigs will be mobilized to install the deep foundation system. Caissons will be installed to a depth of approximately 75 feet to reach bedrock. This phase will involve drilling and constructing reinforced concrete piles to support the future structure. Continuous heavy equipment operations will occur during this period.

Phase 4 – Structural Concrete (10–11 months). After the foundation system is completed, crews will construct the primary structural components of the Arch. This phase will include use of tower cranes (up to 320 feet tall), forklifts, skid steers, and concrete pump systems to construct the vertical and horizontal elements of the Arch.

Phase 5 – Precast Cladding (4–5 months). During this phase, the granite panels will be affixed to the Arch. The granite or marble veneer for the Arch will be sourced from a single quarry located in Vermont, California, or Italy selected according to availability, overall cost, and the desired color and ultimately delivered by truck to Memorial Circle. The granite panels will be assembled on-site as the structure progresses. At the same time, work inside the structure will begin, including installing the stairs and elevators, starting the roofing system to make the building weather-tight, and beginning major mechanical, electrical, and plumbing work.

Phase 6 – Statue Placement and Ceiling Installation (5–6 months). Before the facade is fully completed, a scaffold system will be built to create a working platform to install the Arch ceiling panels. To install the statue, a 300’ tall mobile crane will be required to set and assemble the statue components. As the statue is constructed, a scaffold tower will need to be installed around it to facilitate access for connections, welding, and finishing of the statue. During these events, interior fit out will be concurrently running inside the Arch.

Phase 7 – Site Hardscapes / Landscaping / Project Completion (6–7 months). At this phase, the project will be near completion. All the stone pavers and site walls will be set during this time, as

well as the completion of any other landscape, hardscape, and stormwater management facilities. The interior features will be completed. The demobilization process will be underway and any construction related temporary traffic control will be removed. Permanent traffic changes, including changes to signalization, installation of crosswalks, etc. will be put in place.

Phase 8 – Site Restoration and Demobilization (2 months). At the conclusion of construction, the contractor will remove temporary infrastructure, staging materials, and construction fencing. Disturbed turf and landscape areas within NPS jurisdiction will be restored to preconstruction conditions.

Staging Areas

The construction staging footprint will encompass approximately 45,000 square feet immediately south of the project site, with an additional 80,000 square feet designated for parking and to minimize vehicular traffic obstruction. The staging area will be surfaced with geotextile fabric and six inches of stone to protect underlying soils. These areas will support equipment storage, material laydown, and construction trailers. After construction is complete, these areas will be restored to their current condition and replanted. Tree removal is not anticipated at this time.

Utility Installation

To support operation of the Arch and associated facilities, new potable water, sanitary sewer, electric, gas and telecommunications utilities will be extended to the Memorial Circle area. Utilities will be extended to Memorial Circle from existing utilities using new utilities that will run south along Washington Boulevard to the north end of the Pentagon campus limits and then extend south further into the campus to access available infrastructure. All road crossings associated with the selected action will be constructed using jack-and-bore methods, while utility crossings beneath the Boundary Channel will be installed using Horizontal Directional Drilling (HDD). Where practicable, construction activities occurring within the roadway will be scheduled during non-peak commuting periods to minimize disruption to traffic operations. During peak travel periods, temporary steel plating may be installed over roadway work areas to maintain all travel lanes and sustain vehicular circulation. Installation of utilities will occur over multiple construction phases identified above.

Traffic signal infrastructure will be integrated with the existing system serving Lincoln Circle and the surrounding roadway network. To support this integration, new communication and electric connections will be extended from existing facilities in proximity to the Lincoln Memorial. These utilities will be installed either using HDD or will be placed within or attached to Arlington Memorial Bridge.

Stormwater Management Actions

Stormwater Management Actions During Construction:
During construction, stormwater and erosion control practices will be implemented across the construction site to minimize sediment transport and protect adjacent drainage systems and waterways. Perimeter controls will include installing silt fences or mulch socks along all site fencing to prevent runoff from leaving the disturbed areas. Stormwater and any accumulated groundwater will be managed through a sediment treatment tank prior to discharge into the existing sewer system.

To protect inlets within and adjacent to the work zone, storm drains will be fitted with inlet protection devices. At primary site access points, a stabilized construction entrance will be established, consisting of a concrete apron paired with a 20-foot track of stone to remove sediment from vehicle tires before they enter public roadways. These measures are designed to provide effective sediment control, limit off-site impacts, and maintain compliance with applicable stormwater requirements.

Long-term Stormwater Management:
Because the project will create approximately 62,875 square feet of new impervious surface, on-site stormwater retention is required under District of Columbia regulations. Preliminary estimates indicate a retention volume of about 6,300 cubic feet, with final calculations to be developed during detailed design and included in the stormwater management plan.

To meet these requirements, the project will incorporate perimeter bioretention facilities within the landscaped zones around the monument and within the traffic circle. These features will capture and treat stormwater runoff, reduce reliance on underground structures, and be designed with appropriate pretreatment, overflow, and underdrain components to meet standards developed in compliance with District of Columbia stormwater management regulations.

Groundwater and Dewatering Approach

Geotechnical investigations indicate that groundwater is located roughly 15 feet below the existing surface. As a result, only minimal dewatering will be required during construction. Water management efforts will focus on collecting shallow stormwater and surface water that accumulates in excavations. Small sump pumps will direct this water to a sediment treatment tank before it is discharged into the existing storm sewer system. Construction wastewater, expected to be minimal, will be contained and transported off-site for proper disposal, rather than discharged on-site.

Soil Excavation

The project will require the removal of approximately 1,400 truckloads of existing soils and the import of roughly 400 truckloads of engineered fill. All construction vehicles will be staged

within the designated south project staging lot, with loading and unloading occurring inside the project fence to reduce congestion on adjacent roadways. Daily trucking activity is anticipated to involve between 20 and 30 trucks, transporting an estimated 80 to 100 loads per day. Excavated soils will be transported to approved private disposal facilities in Maryland or Virginia, contingent upon the results of in situ characterization and contamination testing.

Construction Equipment and Work Hours

Construction will require several tower cranes, forklifts, skid steers, drill rigs, and concrete pumping systems. Work will occur year-round with work occurring in two 10-hour shifts per day (20 hours per day) for the duration of the construction period.

The noise analysis models impact pile driving as the loudest anticipated construction activity to provide a conservative assessment of potential noise impacts. Actual noise levels will depend on the construction methods ultimately employed. Noise blankets or noise curtains will be placed around the pile hammer carriage to mitigate noise transmission.

Road Closures and Transportation Routes

The south side of Memorial Circle is anticipated to remain closed for the majority of construction and will represent the primary transportation access impact during this time. To maintain traffic operations, eastbound traffic from Memorial Avenue will be shifted to the north side of the circle.

During this configuration, certain lower-volume movements will be temporarily restricted. Eastbound traffic from Memorial Avenue will not be permitted to turn northbound onto Arlington Boulevard and will instead be directed onto Arlington Memorial Bridge. Northbound traffic from Washington Boulevard will also be restricted from entering the circle and will be required to turn right onto Arlington Memorial Bridge. Westbound traffic from Arlington Memorial Bridge will also be reduced to two travel lanes.

During this time, pedestrian and bicycle access will be maintained through a short detour. This detour will include one additional crossing of two travel lanes, with a rectangular rapid flashing beacon installed to improve crossing visibility and support safer pedestrian and bicycle movements through the construction area.

Additional short-term closures and detours will also be required at the beginning of the construction to establish the maintenance of traffic configuration, and again near the end of construction to complete final transportation-related elements and utility installation.

Construction deliveries and haul-off activities will primarily access the project site via I-395 using Route 27 (Washington Boulevard), which provides the most direct and operationally feasible connection to the south project staging area. As a secondary option, U.S. Route 50

(Arlington Boulevard) may be used when needed, as it offers acceptable access for construction vehicles.

Daily construction trucking will involve approximately 20–30 trucks transporting an estimated 80–100 loads per day. To limit congestion and avoid impacts to public roadways, trucks will be staged within the south project staging lot and all loading and unloading activities will occur inside the project fence line. This approach will maintain safe traffic flow and reduce conflict points between construction vehicles and the surrounding transportation network.

Visitor Access and Visitor Facilities at the Triumphal Arch

Visitor use will be managed through a timed entry system, similar to the system used at the Washington Monument, which may be administered online, on-site, or through a combination of both. Visitors will arrive at their designated entry time, enter a queue, proceed to the screening area on the first floor of the Arch, and undergo security screening before entering the public area of the Arch.

After screening, visitors will enter the public area of the Arch and proceed to the gallery level by either the stairs or the elevator. The internal circulation system will allow visitors to access the gallery, which will house all visitor service functions, including exhibit space, a café, a gift shop, and public restrooms. Visitors may experience guided time and free time within the public area of the Arch and will be expected to depart by the designated exit time to maintain capacity for entry of additional visitors.

The selected action includes mitigation. For the complete list, see Appendix B of this Decision Document. The NPS has the authority to mitigate impacts to park resources and values resulting from actions it authorizes, funds, undertakes, or permits. This authority derives from the NPS Organic Act of 1916, as amended (54 U.S.C. §§ 100101 *et seq.*) and NPS Management Policies 2006. In addition, the NPS may mitigate impacts pursuant to the National Historic Preservation Act (NHPA).

National Security uses

I understand that the Secretary of War and the Secretary of Homeland Security have identified national security uses for the Arch, after completion of its construction. Assessing the Nation's future defense and national security needs is not within the NPS's or the Department of the Interior's regulatory authority. Moreover, no such plans have been finalized. Thus, the NPS's NEPA analysis does not consider any potential future uses of the Arch for national security purposes. Any future decision to use the Arch for national security purposes may require additional review.

1.2 Authority

Authority for construction of the arch is provided in Pub. L. No. 68-463 § 1, 43 Stat. 974 (1925), and in 54 U.S.C. §§ 100101, 100301-100302, which creates the National Park Service to promote and regulate the use of national park areas for their conservation and enjoyment. Sections 100101 and 100301-100302 provide authority for administering areas within the National Park System, thus providing authority for construction, construction planning, and equipment replacement for these purposes. 54 U.S.C. § 101101 authorizes the National Park Service to accept land, rights of way, buildings, or other property within a National Park System unit and money donated for the purposes of the System.

2. CONSULTATION

2.1. National Historic Preservation Act

The Advisory Council on Historic Preservation's (ACHP) regulations implementing Section 106 of the NHPA require Federal agencies to identify historic properties, assess potential effects, and consult with State Historic Preservation Officers (SHPOs), Tribal Nations, local governments, and other consulting parties. The NPS initiated Section 106 consultation with the Virginia Department of Historic Resources (VDHR), the District of Columbia Historic Preservation Office (DC HPO), and consulting parties on June 5, 2026, which included the release of an Assessment of Effects Report and a draft Programmatic Agreement for public and consulting-party review beginning June 5, 2026. These materials were available for a 10-day public comment period from June 5–15. ParkPlanning - Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement. The NPS received a total of 100,936 comments during this period.

The NPS convened a consulting party meeting on June 15 to present its finding that the proposed construction would result in adverse effects on historic properties within the Area of Potential Effects, including cultural landscapes and historic structures along the Memorial Avenue corridor. Attendees included VDHR, DC HPO, the National Capital Planning Commission, the Commission of Fine Arts, Arlington County, ACHP, Architect of the Capitol, NPS National Historic Landmark Program, and the Kennedy Center for the Performing Arts. Consulting parties raised concerns about the expedited consultation schedule, the adequacy of the Area of Potential Effects, information gaps, and the denial or pending status of consulting party requests from advocacy organizations. ParkPlanning - Triumphal Arch - Section 106 Consulting Party Meeting #1. NPS reviewed all comments received from the SHPOs and consulting parties and revised the Assessment of Effects to address the comments.

On June 22, 2026, to continue consultation, NPS sent correspondence seeking to clarify whether the SHPOs believed any mitigation or minimization measures were available for the project as proposed, assuming the Arch remained approximately 250 feet tall and located at Memorial Circle. The letters specifically asked the SHPOs either to confirm that adverse effects could not

be minimized or mitigated under those parameters, or to provide mitigation ideas that do not require relocation or diminution of the Arch. On July 10, 2026, the NPS sent correspondence inviting additional consulting parties to participate and reopened and extended the opportunity for public comment from July 10, 2026, to July 30, 2026. During this July comment period, the NPS received a total of 6,254 comments. The NPS reviewed and considered all comments received during the public comment period. A summary of the comments and NPS responses is included in Appendix C of this Decision Document.

On July 28, 2026, the NPS requested DC HPO, VDHR, and consulting parties to review and comment on a revised Area of Potential Effect and list of historic properties by August 6, 2026. On August 28, 2026, the NPS distributed correspondence to the DC HPO, VDHR, ACHP and the consulting parties requesting review of a revised Assessment of Effects Report, with comments due by September 8, 2026. The NPS later extended the comment period to September 16, 2026. On September 9, 2026, a second consulting party meeting was held. The meeting focused on presenting and reviewing the updated Assessment of Effects Report. The discussion covered the project's scope, historic property evaluations, adverse effect determinations, and the rationale behind the project's location and design choices. Participants raised questions about historic intent, visual impacts, compliance with preservation standards, and the consideration of alternatives, expressing concerns about the severity of impacts, the adequacy of mitigation, and the next steps toward resolving effects through continued consultation. ParkPlanning - Triumphal Arch - Section 106 Consulting Pary Meeting #2.

On September 15, 2026, the NPS sent correspondence to the DC HPO, VDHR, ACHP and the consulting parties requesting review and comment on a draft Memorandum of Agreement, with comments due by noon on September 21, 2026. On September 24, 2026, the ACHP advised the NPS that it was terminating consultation pursuant to 36 CFR § 800.7(a)(4). On October 9, 2026, the ACHP followed with final comments on consultation, to which the Department of the Interior replied on the same day. The Department of the Interior followed with a response to ACHP's final comments on November 5, 2026. Correspondence related to Section 106 consultation is included in Appendix E.

2.2 Endangered Species Act

Section 7 of the Endangered Species Act requires Federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any listed species or destroy or adversely modify designated critical habitat. This obligation includes evaluating potential effects of Selected Actions and consulting with the U.S. Fish and Wildlife Service or NOAA Fisheries, as appropriate. For this project, three species were identified in the IPaC resource list: the northern long-eared bat (*Myotis septentrionalis*) (Endangered), tricolored bat (*Perimyotis subflavus*) (Proposed Endangered), and monarch butterfly (*Danaus plexippus*). The NPS determined the selected action will have no effect on the northern long-eared bat and

the tricolored bat. This determination is documented in the attached letter dated June 10, 2026, Appendix F of this Decision Document. Based on site conditions and available survey information, the NPS determined that no suitable habitat for the monarch butterfly is present within the project area. Because the vegetation is regularly maintained and does not support the milkweed or other resources required for monarch breeding or larval development, the Selected Action will result in no effect on this species.

2.3 Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and Executive Order 13186

Federal responsibilities for protecting migratory birds are established under the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and Executive Order 13186, which collectively require agencies to avoid take, minimize impacts, and promote the conservation of native bird species. To comply with these responsibilities, NPS coordinated with the U.S. Fish and Wildlife Service and received written concurrence on June 25, 2026, confirming that the project meets all applicable migratory bird protection requirements. The project area provides no suitable habitat for Birds of Conservation Concern and although the project location lies between two Important Bird Areas, Theodore Roosevelt Island to the north and Dyke Marsh Wildlife Preserve to the south, the U.S. Fish and Wildlife Service concluded that these IBAs will not be affected by project activities. See Appendix F of this Decision Document.

2.4 United States Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) has a design review authority over new structures erected in the District under the direction of the Federal government (45 C.F.R. §§ 2101 (a)(1), 2101(f)) and over all important plans for parks and all public buildings for which "in any essential way affect the appearance of the City of Washington, or the District of Columbia" (45 C.F.R. §§ 2101(a)(2), 2101(d)). Consistent with these requirements, the Triumphal Arch project was submitted to the Commission for evaluation, and the CFA provided concept approval for the project on April 16, 2026, and final approval on May 21, 2026. This approval fulfills the obligation to obtain CFA concurrence on design quality and compatibility with the historic and symbolic landscape of the National Capital. Correspondence from the CFA is attached in Appendix G of this Decision Document.

2.5 National Capital Planning Commission

The National Capital Planning Commission (NCPC) is responsible for reviewing federal projects within the National Capital Region to ensure that planning, design, and development actions are consistent with the Federal Elements of the Comprehensive Plan and uphold the integrity of the region's historic and symbolic landscape. As part of this requirement, the Department of the Interior submitted the Triumphal Arch project materials comments on concept plans for NCPC's June 4, 2026, meeting. The Department of the Interior provided additional design details and

following the meeting, NPS provided the EA and FONSI to NCPC for preliminary review for the July 9, 2026 meeting. NCPC accepted public comment on the Arch project during its Open Meeting on July 9, 2026. Additionally, NCPC voted to preliminarily approve the proposed Arch at its July 9 meeting. On October 2, 2026, the Department of the Interior provided the NCPC with updated design information, the Revised EA and Revised FONSI, along with additional materials the NCPC had requested as part of a final review submission package for the November 5, 2026, meeting. At its November 5, 2026, meeting, the NCPC voted to give final approval to the Arch. Correspondence from the NCPC is included in Appendix H.

2.6 Federal Aviation Administration

Because the Triumphal Arch project at Memorial Circle would involve construction of a tall permanent Arch and the temporary use of large cranes, review by the Federal Aviation Administration (FAA) was required to determine whether the project would affect navigable airspace or aviation operations. Ronald Reagan Washington National Airport (DCA) is located approximately three miles south of Memorial Circle. Under 49 U.S.C. § 44718 and 14 CFR Part 77, the FAA evaluates proposed structures that exceed certain height thresholds or may otherwise be considered obstructions to air navigation. As part of this planning process, the FAA's Obstruction Evaluation Group (AJV-15) conducted a series of aeronautical studies to assess the Arch and associated construction equipment.

The FAA initiated its review with an internal evaluation documented in Aeronautical Study No. 2026-AEA-5959-OE on June 1, 2026. Following its initial analysis, the FAA issued a Notice of Preliminary Findings on July 28, 2026 (Aeronautical Study No. 2026-AEA-8628-OE) for the proposed monumental arch, providing the agency's preliminary assessment of the structure's effects on navigable airspace. In addition to evaluating the permanent monument, the FAA reviewed the temporary construction equipment required to construct the Arch. The FAA determined that neither the proposed arch nor the temporary construction equipment would constitute a hazard to air navigation.

Upon completion of its aeronautical review, the FAA issued a final Determination of No Hazard to Air Navigation for the proposed Triumphal Arch on September 18, 2026 (Aeronautical Study No. 2026-AEA-8628-OE). The determination concluded that the monument, as proposed and evaluated, would not constitute a hazard to air navigation. The FAA reports are included in Appendix I of this Decision Document.

3. PUBLIC INVOLVEMENT

The NPS held a 10-day public comment period on the Assessment of Effects and the draft Programmatic Agreement from June 5–15, 2026, consistent with Section 106 requirements, and accepted written comments through both the Planning, Environment, and Public Comment (PEPC) system and by email. During this period, NPS received a total of 100,936 public

comments. NPS conducted an additional 20-day public comment period from July 10–30, 2026, during which 6,254 comments were received. All comments received during both comment periods were compiled and analyzed. The Comment Summary Report documents the comments received during the June comment period, while the Comment Summary Report Addendum summarizes the comments received during the July comment period. Both reports are available online through the Planning, Environment, and Public Comment (PEPC) system at https://parkplanning.nps.gov/triumphalarch. NPS has consolidated these reports and developed responses to substantive issues raised during both comment periods, which are included in Appendix C of this Decision Document.

4. SUMMARY OF CHANGES FROM THE JUNE 2026 ENVIRONMENTAL ASSESSMENT TO THE REVISED ENVIRONMENTAL ASSESSMENT

Following publication of the June 2026 EA, the NPS determined that project design refinements, information developed through consultation, and the results of additional technical studies warranted preparation of a Revised EA. Accordingly, the NPS published a Revised EA in October 2026. The NPS considered the analyses and conclusions presented in the Revised EA in reaching a Revised FONSI, also dated October 2026, which is included in this Decision Document as Appendix A.

The Revised EA includes revisions to both the proposed action and the environmental analysis. These revisions were informed by ongoing coordination and consultation with the FAA, Arlington National Cemetery, the U.S. Department of War, the NCPC, State Historic Preservation Offices, and Section 106 consulting parties; consideration of public comments; and completion of additional technical studies. The proposed action in the Revised EA is the selected action in this Decision Document.

In the June 2026 EA, the NPS analyzed multiple utility corridor alternatives. Following publication of the EA, the NPS conducted additional constructability evaluations of the corridors. These evaluations revealed that several of the alternatives would be more complex to construct and would require the use of multiple corridors to accommodate different utility types. As disclosed in the June 2026 EA, one corridor could have impacted a known archaeological site and the Boundary Channel Bridge. In response to these findings, the NPS revised the EA to evaluate a preferred utility corridor that accommodates most utilities within a single alignment, avoids the known archaeological site, does not cross the Boundary Channel Bridge, and minimizes intrusions on or adjacency to Arlington National Cemetery. As described in the Revised EA, utilities would extend from the Pentagon largely along existing developed roadway corridors, thereby reducing the potential for adverse effects on cultural and natural resources.

Public comments and consultation with the National Capital Planning Commission following publication of the June 2026 EA identified concerns regarding the potential for construction noise to disrupt speech and diminish the solemn character of Arlington National Cemetery. To

address these concerns, the NPS revised the proposed action to require the use of noise attenuation blankets on pile-driving equipment. The NPS updated the noise analysis in the Revised EA to reflect this mitigation measure and its effectiveness in reducing construction-related noise impacts.

The Revised EA incorporates updates based on information developed during the Section 106 consultation process. Several changes were made to ensure consistency with the Assessment of Effects, including updates to the purpose and need statement (replacing “structure” with “arch”) and additional discussion explaining why certain alternatives were dismissed from detailed analysis. Information provided by State Historic Preservation Offices and other Section 106 consulting parties also informed revisions to the cultural resources analysis, including expansion of the area evaluated for potential impacts, additional discussion of cultural landscapes, and recognition that the Arch may be visible from a broader geographic area than originally considered, including during nighttime conditions. As part of the Section 106 consultation process, a viewshed study was completed to provide additional information regarding visual impacts. In response to concerns regarding views from and potential effects on Arlington National Cemetery, the EA was revised to include additional visual impact analysis from viewpoints within the cemetery. Following publication of the June 2026 EA, the NPS also completed a geoarchaeological investigation to assess whether buried deposits with archaeological potential are present within Memorial Circle, and incorporated the results of that study into the Revised EA. Finally, the Revised EA includes additional mitigation measures developed through the Section 106 consultation process to further reduce adverse effects on historic properties. These mitigation measures are included as Appendix B to this Decision Document.

In response to questions and concerns raised by the NCPC regarding the proposed lighting design for the Arch, the NPS commissioned a lighting study. Based on the results of that study, the lighting design for the proposed action was updated to align with the character of Washington, D.C.’s monumental core. In addition, the required aviation obstruction lighting was revised based on additional consultation with, and aeronautical studies conducted by, the FAA. The Revised EA includes a new section that evaluates the impacts associated with these lighting components.

Following publication of the June 2026 EA, the NPS, in coordination with the U.S. Department of Transportation's Volpe National Transportation Systems Center (Volpe Center), continued to collect data and study potential effects on vehicular, bicycle, and pedestrian circulation in the vicinity of Memorial Circle. Memorial Circle and the surrounding transportation network have been the focus of transportation planning efforts for many years due to their importance as a critical regional transportation corridor. These efforts have been driven, in part, by longstanding concerns regarding safety and multimodal connectivity. Since publication of the June 2026 EA, several previously planned transportation improvement projects have advanced, and additional

projects in the vicinity of Memorial Circle have been identified as reasonably foreseeable. Although these projects are expected to improve transportation conditions in the area, they are independent of and not contingent upon construction of the Triumphal Arch. The NPS updated the Revised EA to incorporate the results of these refined transportation analyses and to reflect current conditions as well as reasonably foreseeable changes to the transportation network within the project area.

5. RATIONALE FOR DECISION

The decision to construct a Triumphal Arch at Memorial Circle is supported by the site's design history and its unrealized monumental intent. Early 20th-century plans for Columbia Island, now Memorial Circle, envisioned a grand, symbolically charged landscape that reinforced the ceremonial alignment between Arlington Memorial Bridge and Arlington National Cemetery. Over several decades, the Commission of Fine Arts reviewed concepts including a large elliptical plaza framed by formal cross-axes, monumental pavilions, and prominently, two columns representing national reunion. Although successive design revisions in the 1930s scaled back these ambitions, reducing three planned circles to one and replacing proposed monumental columns with smaller sculptural pavilions, the original vision of a major feature anchoring the Circle was never fulfilled. The selected action, a Triumphal Arch, continues this historic lineage by introducing a focal point that reflects the site's intended character and celebrates 250 years of American independence. In doing so, it completes a century-old civic design concept while providing a new interpretive and experiential landmark.

Placing the Triumphal Arch within the George Washington Memorial Parkway is consistent with the park's purpose as a scenic roadway honoring the nation's first president and protecting the cultural and natural resources that frame the Potomac River corridor. The Arch's role in celebrating the 250th anniversary of the United States aligns with the Parkway's longstanding function as a landscape dedicated to reflection on national ideals, unity, and sacrifice. The project also relates to several of the Parkway's fundamental resources and values, including its iconic vistas and views, by offering a new elevated vantage point from which visitors can experience sweeping views of the Potomac River and nearby commemorative features, and its diverse recreational opportunities, by introducing a new destination for learning, contemplation, and sightseeing. While the project occurs within a complex transportation setting, planned adjustments to the traffic circle, crosswalks, and pedestrian facilities will improve visitor safety and comfort, making it easier and safer for pedestrians and bicyclists to access Memorial Circle and the Arch.

The NPS did not select the no action alternative because it did not advance these purposes, including completing the design concept of Memorial Circle, celebrating the 250th anniversary of the United States, and improving the visitor experience of the Parkway.

6. APPROVAL

Recommended:

JESSICA BOWRON

Digitally signed by JESSICA BOWRON
Date: 2026.11.05 22:49:56 -05'00'

Jessica Bowron, Comptroller, Exercising the Delegated Authority of the Director, National Park Service

Approved:

NOV 05 2026

Doug Burgum, United States Secretary of the Interior

APPENDICES

Appendix A. Revised Finding of No Significant Impact
Appendix B. Mitigations
Appendix C. Non-Impairment Determination
Appendix D. Public Comments and Responses for National Historic Preservation Act Public Comment Period
Appendix E. National Historic Preservation Act Consultation Correspondence
Appendix F. Endangered Species Act and Migratory Bird Treaty Act Consultation Documentation
Appendix G. Consultation with the Commission of Fine Arts
Appendix H. Consultation with the National Capital Planning Commission
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APPENDIX A

REVISED FINDING OF NO SIGNIFICANT IMPACT

(SEPARATE FILE)

APPENDIX B

MITIGATIONS

To minimize environmental impacts of the selected action, the NPS would implement mitigation measures whenever feasible. Exact mitigation measures to be implemented would depend upon the final design and approval of plans by relevant agencies and would be determined during future design and construction phases.

The following is a list of actions that could take place:

D.1. General Mitigations

Instruct all contractor employees on the sensitivity of the general environment and monitor their activities by NPS staff or Construction Management Representative in order to mitigate and minimize potential impacts on natural and cultural resources during construction. Corridors for construction vehicle movement would be established and defined on the ground. Staging of construction equipment would be restricted to the road corridor, parking lots, and other identified previously disturbed areas to avoid impacts on natural resources.

All permits would be acquired from the regulatory agencies before commencement of work, and all stipulations of those permits would be followed.

Clearly state all protection measures in the construction specifications and instruct workers to avoid conducting activities beyond the fenced construction zone.

Fence all areas in order to keep related disturbances within an NPS-defined and minimal impact area required for construction.

Implement standard noise abatement measures during construction. Standard noise abatement measures could include the following elements: a schedule that minimizes impacts on adjacent noise-sensitive uses, the use of the best available noise control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, and location of temporary noise sources as far from sensitive uses as possible.

Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting and silt fencing in construction areas to reduce erosion, surface scouring, and discharge to water bodies.

Reseed all areas with native grasses or other NPS approved turf seed mix approved for the Mid-Atlantic Region.

Remove invasive plants from construction areas using approaches prescribed in the NPS Integrated Pest Management Program.

Implement measures to prevent invasive plants from returning to sites where they have been removed, such as ensuring that construction-related equipment arrives at the site free of mud or seed-bearing materials and certifying that all seeds and straw material are weed-free.

Rehabilitate areas that are temporarily disturbed during construction with native grasses and other native species as per NPS standards and consistent with the cultural landscape report and applicable historic planting plans.

During construction, the staging area limits should be fenced off and located outside the Critical Root Zone (CRZ) of any existing tree. The CRZ is calculated as 1.5 feet for every 1-inch DBH (Example: 20-inch DBH = 30-foot radius circle of protection around the tree). Any construction activity (staging, storage, parking, etc.) should be strictly prohibited outside the staging area fence limits to properly protect the existing trees and their root systems.

If needed, tree removal, clearing, and construction activities would not take place during the roosting and pupping season of the northern long-eared bat (June 1-July 31) to avoid disturbance to potential maternity roosts in the area. During future project phases, if it is determined that clearing or construction is needed during these seasons, the NPS would coordinate with the US Fish and Wildlife Service to ensure no impacts would occur.

If tree removal or cutting is to be undertaken between April 1 and October 3, the NPS would conduct a nest survey for bald eagles and other migratory nesting birds. If nests are observed within the project area, measures to avoid disturbance would be determined through coordination between the NPS, the US Fish and Wildlife Service, and/or appropriate state agencies. If nests are present, a biological monitor may be employed to prevent potential impacts to birds during construction activities undertaken during this period.

D.2. Mitigations Applying to Historic Properties

Construction Management Control

Develop and implement a vibration monitoring plan - Install vibration monitors near Arlington Memorial Bridge and other historic structures, bridge approaches, historic stonework, pylons, retaining walls, and other sensitive resources. Establish thresholds requiring work modification or stoppage if vibration exceeds approved limits.

Screening of Construction Areas - Use neutral, visually recessive screening to reduce temporary visual effects from construction fencing, equipment, trailers, stockpiles, and staging areas.

Control Temporary Lighting - Limit construction lighting to the minimum necessary, direct it downward, shield it, and prohibit unnecessary nighttime lighting that would affect historic views or cemetery solemnity.

Construction Noise Control Plan - Establish enforceable limits, monitoring, notification, and work restrictions for noise-generating activities. Would include the use of sound barriers or acoustic blankets, locate generators where noise is reduced, coordinate with Arlington National Cemetery, and limit nighttime work.

Ceremonial Route Protection Plan - Coordinate with Arlington National Cemetery to avoid disruptive construction activities during funerals, wreath ceremonies, major commemorative events, and ceremonial movements.

Work-hour limitations - Restrict work hours for high-noise, high-vibration, or highly visible construction activities to minimize effects on visitor experience and ceremonial use of historic properties.

Pedestrian and visitor access protection - Maintain safe, legible pedestrian routes to Arlington Memorial Bridge, Memorial Avenue, LBJ Park, Arlington National Cemetery, and nearby memorials during construction.

Construction Management Plan - Require a Construction Management Plan to minimize construction-period effects to historic properties, adjacent resources, traffic circulation, visitor access, and the surrounding commemorative landscape. The plan would address traffic control, sediment and erosion controls, laydown-area limits and restoration, off-site fabrication to reduce on-site activity, limited worker parking with use of Metro or remote parking, enclosed workforce break areas, self-contained restroom facilities, vibration and movement monitoring for adjacent structures, coordination of pile-driving and other disruptive activities around planned events, use of a fixed tower crane to reduce street impacts, and off-site fabrication of arch cladding to minimize truck trips, equipment, labor, and laydown needs at the project site.

Construction Dust Control Plan - Fugitive emission sources include the transfer of sand and aggregate, truck loading, mixer loading, vehicle traffic, and wind erosion from sand and aggregate stockpiles. The amount of fugitive emissions generated during the transfer of sand and aggregate depends primarily on the surface moisture content of these materials. Wetting materials prior to moving or if dust is being generated reduces air emissions that then become sediment that falls into surrounding waterways.

Maintain Construction Site and Staging Area BMPs for Wildlife/IPM - All trash receptacles must be lidded and emptied regularly to avoid attracting wildlife. Trailer crawl spaces should be screened to avoid wildlife utilizing them. Doors should be fitted, remain closed when not in use, and maintain sweeps to avoid rodent infiltration.

Archaeological Investigation

Implement Archaeological Identification, Protection, Monitoring, and Treatment Measures – where warranted by changes in final design or utility routing, or by unanticipated discoveries,

implement additional archaeological identification, evaluation, monitoring, and treatment prior to and during ground disturbance. Measures would include review of final design and utility routes for archaeological sensitivity; preparation of an Archaeological Work Plan; completion of Phase IB, geoarchaeological, or other investigations where warranted; avoidance of significant archaeological resources where feasible; preparation of an Archaeological Treatment Plan or Data Recovery Plan if avoidance is not feasible; archaeological monitoring during excavation, foundation work, and utility installation; stop-work and notification procedures for unanticipated discoveries; specific protocols for human remains and culturally sensitive materials; contractor cultural-resource training; and final reporting, analysis, and curation of recovered materials and records. This could include the following:

- Phase IB archaeological testing before final design
- Utility corridor archaeology investigations
- Archaeological monitoring during deep excavation
- Archaeological Treatment Plan / Data Recovery Plan
- Public archaeology component

If previously unknown archaeological resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery shall be halted until the resources are identified and documented and an appropriate mitigation strategy developed, if necessary, in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement Among the NPS (US Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.

Park Improvements

Rehabilitate Memorial Avenue historic landscape - Rehabilitate contributing landscape features along Memorial Avenue to reinforce its historic role as the ceremonial approach between Arlington Memorial Bridge and Arlington National Cemetery. Improvements could include restoration of turf panels, medians, walkways, curbs, planting patterns, tree canopy, lighting, and other character-defining landscape features that contribute to the formal procession from the bridge to the cemetery. Work would be designed to preserve the corridor's axial organization, solemn character, and commemorative function while improving landscape condition, pedestrian safety, and long-term maintainability.

Restore or enhance Arlington Memorial Bridge approach landscapes – Restore or enhance the designed landscapes at the approaches to Arlington Memorial Bridge to improve the integrity of associated historic landscape features and strengthen the visual and ceremonial relationship between the Lincoln Memorial, the Arlington Memorial Bridge, Memorial Circle, and Memorial

Avenue. Improvements could include repair or replacement in kind of damaged paving, curbs, walls, planting areas, lawn panels, and other contributing features; removal or consolidation of non-historic visual clutter; and rehabilitation of landscape areas disturbed by construction, staging, utilities, or circulation changes. These measures would be implemented using materials, planting treatments, and design details compatible with the historic bridge setting.

Improve visitor wayfinding and pedestrian orientation - Improve visitor wayfinding between Memorial Avenue, Arlington National Cemetery, Arlington House, nearby transit facilities, and associated pedestrian routes to reduce confusion, improve safety, and minimize conflicts among visitors, vehicles, funeral processions, and daily cemetery operations. Wayfinding improvements could include coordinated directional signage, pavement markings, accessible route information, maps, digital tools, and discreet interpretive orientation at key decision points. All wayfinding elements would be designed to be visually compatible with the historic setting, avoid unnecessary sign clutter, and support movement through the corridor without diminishing the solemn and ceremonial character of Memorial Avenue and Arlington National Cemetery.

Documentation

Prepare Historic American Landscapes Survey (HALS) documentation for Memorial Circle and the Memorial Avenue corridor - Prepare HALS documentation for Memorial Circle, Memorial Avenue, and associated designed landscape features to create a permanent record of the corridor prior to project implementation. The documentation would address the corridor's historic development, spatial organization, circulation patterns, planting structure, lawn panels, views and vistas, small-scale features, and relationship to Arlington Memorial Bridge, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, and the Lincoln Memorial. Documentation would include large-format photography, written historical narrative, existing-condition plans, and other materials meeting applicable HALS standards.

Prepare Historic American Building Survey (HABS)/HALS documentation for affected designed landscapes and views - Prepare appropriate HABS and/or HALS documentation for affected historic properties, designed landscapes, and significant views that may experience adverse visual, spatial, or setting-related effects. This documentation would record character-defining features, designed views, circulation relationships, landscape composition, and the physical and visual connections among the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, Arlington House, and adjacent parklands. The documentation would supplement existing National Register or
National Historic Landmark documentation where current records do not fully describe viewsheds, spatial relationships, or cultural landscape significance.

Complete historic viewshed documentation - Prepare a systematic photographic and narrative record of existing views and vistas within the cross-Potomac commemorative corridor. The documentation would include key viewpoints from the Lincoln Memorial, Arlington Memorial

Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, Fort Myer, and other locations identified through consultation. Photography would be completed in leaf-on and leaf-off conditions, during daytime and nighttime conditions, and, where feasible, during ceremonial or high-use conditions to document how the corridor is experienced in different seasonal, lighting, and operational contexts. The final record would identify the viewpoint, date, time, lens information, field of view, direction, and historic significance of each view.

Develop a 3D digital model and LiDAR record of the corridor - Prepare a three-dimensional digital documentation package, which may include LiDAR scanning, photogrammetry, GIS-based viewshed modeling, or other digital survey methods, to create a permanent record of pre-project spatial relationships and existing conditions. The model would document the relationship among Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, and the Lincoln Memorial, including topography, circulation, landscape features, and key sightlines. The digital record could be used for archival purposes, future preservation planning, public interpretation, and comparison with post-construction conditions.

Prepare archival-quality drone and ground photography - Complete archival-quality aerial and ground-based photography to document existing views, landscape organization, circulation patterns, and cultural landscape relationships before construction. Drone photography would be used where permitted and appropriate to capture the spatial relationship of the corridor from above, including the alignment from the Lincoln Memorial across Arlington Memorial Bridge to Memorial Circle, Memorial Avenue, Arlington National Cemetery, and Arlington House. Ground photography would document the visitor-level experience from key public viewpoints and ceremonial routes. All photography would be catalogued and retained as part of the project's permanent mitigation record.

Conduct oral histories related to the commemorative corridor - Develop an oral history program to document the meaning, use, and public significance of the Lincoln Memorial–Arlington House commemorative corridor. Interviewees could include historians, veterans, preservation professionals, Arlington National Cemetery families, representatives of veterans' organizations, NPS staff, Arlington National Cemetery staff, landscape architects, design experts, and others with knowledge of the corridor's history, symbolism, and contemporary use. Oral histories would address the meaning of the visual axis, the ceremonial role of Memorial Avenue and Arlington Memorial Bridge, the experience of visiting Arlington National Cemetery and Arlington House, and the evolution of the corridor as a commemorative landscape. Transcripts and recordings would be archived and, where appropriate, made available for interpretation, research, or public education.

Develop a history of the creation of Lady Bird Johnson Park - Prepare a focused historical study documenting the creation, design, naming, development, and evolution of Lady Bird Johnson

Park within the broader Columbia Island and Memorial Circle landscape. The study would address the park's relationship to Arlington Memorial Bridge, the George Washington Memorial Parkway, Memorial Circle, the Potomac River, and the commemorative landscape connecting Washington, D.C. and Arlington. The history would also examine the park's landscape design, plantings, circulation, commemorative associations, environmental setting, and role as a visual and physical frame for Memorial Circle. The final product could support future management, interpretation, National Register documentation, and cultural landscape treatment recommendations.

Create a meadow management program and plan for Lady Bird Johnson Park - Where appropriate (based on use), consider transitioning lawns throughout Lady Bird Johnson Park (Columbia Island) to meadows with native grasses. In addition to making Lady Bird Johnson Park compatible with the proposed conditions on Memorial Avenue, conversion to native grasses (rather than turf) would also reduce the need to mow, increase biodiversity, and provide habitat for pollinators. Collaborate with natural resource management to determine appropriate grasses and seed selection.

Interpretation

Develop an interpretive program on the Lincoln Memorial–Arlington House axis - Develop an interpretive program explaining the historic, symbolic, and commemorative relationship among the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House. The program would address the corridor's design intent, its association with national unity and reconciliation, its role as a ceremonial connection between Washington, D.C. and Arlington, and the ways in which the landscape has evolved over time. Interpretation could be delivered through ranger-led programs, digital media, waysides, printed materials, and educational content.

Develop a digital interactive or wayside viewshed exhibit- Create an interactive digital exhibit, wayside exhibit, or combination of both that allows visitors to compare historic, existing, and post-project views within the commemorative corridor. The exhibit would help visitors understand how views across the Potomac River have changed over time and how the monumental core evolved through successive periods of planning, design, commemoration, transportation development, landscape change, and federal stewardship. The exhibit could include historic maps, plans, photographs, visual simulations, annotated viewsheds, and layered "then-and-now" comparisons.

Install interpretive waysides at Memorial Circle and Memorial Avenue - Install a limited number of compatible interpretive waysides at Memorial Circle and along Memorial Avenue to explain the design history and significance of Memorial Circle, Columbia Island, Arlington Memorial Bridge, Memorial Avenue, and the McMillan-era commemorative landscape. The waysides would describe the corridor's role as a formal ceremonial approach, its relationship to Arlington

National Cemetery and Arlington House, and its connection to the Lincoln Memorial and National Mall. The signs would be designed to be visually compatible with the historic setting and located to avoid sign clutter or interference with character-defining views.

Develop an NPS webpage on the development and significance of the cross-Potomac commemorative corridor - Develop a publicly accessible webpage describing the development of Lady Bird Johnson Park, the Lincoln Memorial, Arlington National Cemetery, Arlington House, Arlington Memorial Bridge, Memorial Avenue, and the scenic and symbolic connections among these resources. The webpage would provide historical context for the corridor, explain its commemorative and landscape significance, and present historic plans, photographs, maps, and interpretive narratives showing how the corridor has changed over time. The webpage could also serve as a central repository for related interpretive materials, historic documentation, and links to digital exhibits.

Develop a webpage on the history and significance of triumphal arches - Develop an interpretive webpage explaining the history, symbolism, and evolution of triumphal arches as monumental forms. The webpage would address the origins and use of triumphal arches in different historical and cultural contexts, their association with military victory, civic identity, national celebration, and public memory, and how the proposed Arch relates to or differs from those traditions. The webpage could also discuss how monumental forms are evaluated within historic landscapes and how new memorials become part of an evolving public landscape.

Display archaeological materials recovered from project-related investigations where appropriate - Develop a curated display of archaeological materials recovered from the Arch project and other related improvement projects, where appropriate and consistent with applicable laws, curation standards, and consultation outcomes. The display could be located within a climate-controlled public or interpretive space in the base of the Arch and would present recovered materials in a manner that explains their historical context, research value, and relationship to the development of Columbia Island, Lady Bird Johnson Park, Memorial Circle, and the Potomac River landscape. Sensitive materials, including human remains, funerary objects, sacred objects, or culturally sensitive items, would not be displayed unless expressly appropriate and consistent with applicable consultation and legal requirements.

Develop an exhibit on archaeological investigations, made land, and landfilling - Develop an exhibit explaining the archaeological investigation process, the importance of made land surfaces, and the engineering history of landfilling in the development of Lady Bird Johnson Park and Washington, D.C. The exhibit would describe how archaeologists identify buried landforms, former shorelines, fill episodes, historic deposits, and other subsurface evidence of landscape change. It would also explain the broader role of land reclamation, dredging, filling, and shoreline modification in the growth of the capital city and the creation of parkland along the Potomac River.

Install QR-code interpretation on maritime activity along the Potomac River – Develop discreet signage with a QR code linking to information about maritime activity along the Potomac River, particularly in relation to Washington, D.C., Arlington, Columbia Island, and the development of the river corridor. The digital content could address navigation, commerce, military activity, ferry crossings, bridges, shoreline change, dredging, landfilling, stormwater management and related water quality, and the transformation of the Potomac from a working river landscape into a monumental, recreational, and ceremonial setting.

Install interpretation on Native peoples and the Potomac River - Develop interpretive signage, digital content, or both, addressing Native peoples with ancestral connections to the Potomac River and surrounding landscape. The interpretation would explain the importance of the river for travel, trade, subsistence, settlement, and cultural life before and during early colonial contact. This content would be developed in consultation with affiliated Tribes to ensure that the interpretation is accurate, respectful, and appropriate, and that it reflects Tribal perspectives where Tribes wish to provide them.

Install signage and QR-code interpretation on affected scenic viewsheds and vistas - Develop a coordinated set of interpretive signs and QR-code-linked digital materials explaining the scenic viewsheds and vistas affected by the proposed project. The interpretation would identify key views, explain their original design intent and historic significance, and describe how the Arch fits within the continued evolution of Washington, D.C.'s memorial landscape and public commemoration. The signs would be limited in number, carefully sited, and designed to avoid adding visual clutter to sensitive historic views.

Lincoln Memorial viewshed: Interpretation would explain the view from the Lincoln Memorial toward Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House, including the symbolic association of this cross-Potomac axis with national unity, reconciliation, and remembrance.

Arlington National Cemetery viewshed: Interpretation would describe views from cemetery approaches, Memorial Avenue, Arlington House, and other appropriate vantage points toward the Lincoln Memorial and the monumental core, emphasizing the ceremonial and commemorative role of the corridor.

Lady Bird Johnson Park: Interpretation would explain the creation, design, naming, and evolution of Lady Bird Johnson Park, including its relationship to Columbia Island, Memorial Circle, Arlington Memorial Bridge, the George Washington Memorial Parkway, and the Potomac River landscape.

Mount Vernon Trail / regional trail connections: Interpretation would explain relevant trail connections, pedestrian routes, and recreational corridors within the broader commemorative

landscape, including their relationship to the Potomac River, park development, and public access.

Digital map stories and QR-code content: QR codes could link to map-based stories showing the development of each location over time, including historic plans, photographs, aerial imagery, design drawings, National Register documentation, and changes in views, circulation, landform, vegetation, and commemorative use.

APPENDIX C

NON-IMPAIRMENT DETERMINATION

COMPLIANCE WITH NATIONAL PARK SERVICE (NPS) MANAGEMENT POLICIES ON UNACCEPTABLE IMPACTS AND THE NON-IMPAIRMENT STANDARD

As described in National Park Service (NPS or Service) 2006 Management Policies, § 1.4.4, the National Park Service Organic Act prohibits the impairment of park resources and values. *Guidance for Non-Impairment Determinations and the NPS NEPA Process* (April 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA). The NPS has completed a non-impairment analysis for the selected action for the Triumphal Arch and determined, in the professional judgment of the decision-maker, that construction of the Arch will not result in impairment of Park resources or values, or in unacceptable impacts as described in § 1.4.7.1 of the 2006 NPS Management Policies.

The full description of the selected action is found in Section 1 of the Decision Record and incorporated by reference here. The selected action includes construction of a Triumphal Arch within Memorial Circle in George Washington Memorial Parkway (Parkway), along with a redesigned public plaza, and associated infrastructure upgrades.

To make an impairment determination, the NPS considers the following policies:

An impact on any park resource or value may constitute impairment, but an impact will be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS Management Policies 2006, Section 1.4.5).

Resources and values subject to the non-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archaeological resources; cultural landscapes; ethnographic

resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established (NPS Management Policies 2006, Section 1.4.6).

NPS non-impairment analysis normally does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, land use, park operations, traffic or circulation, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See NPS Management Policies 2006, § 1.4.6. above (See also, *Guidance for Non-Impairment Determinations and the NPS NEPA Process*, April, 2025).

PURPOSE AND FUNDAMENTAL RESOURCES AND VALUES OF GEORGE WASHINGTON MEMORIAL PARKWAY

The purpose of the park and its fundamental resources and values are an important context for a non-impairment determination. The purpose statement for the Parkway is found in its *Foundation Document,* which states:

> George Washington Memorial Parkway is a scenic roadway honoring the nation's first president, that protects and preserves cultural and natural resources along the Potomac River below Great Falls to Mount Vernon, and is part of a comprehensive system of parks, parkways, and recreational areas surrounding the nation's capital. *Foundation Document*, page 9.

The *Foundation Document* identifies several fundamental resources and values that are impacted by this project, including some that are not subject to impairment analysis but still warrant acknowledgment. Among these are the Parkway's driving experience and the Parkway's transportation infrastructure, which are not subject to the impairment standard because they are not park resources and values identified in Section 1.4.6 of NPS Management Policies. While the proposed signalization changes and other smaller changes to lanes and curbs will alter how pedestrians, bicyclists, and vehicles move around Memorial Circle, these modifications will improve pedestrian and bicycle access and safety and will not eliminate or fundamentally diminish the Parkway's driving experience or its role as a major commuter route for the Washington, D.C. region. Additionally, the Parkway's function in the memorialization and celebration of American ideals, providing a landscape for visitors to reflect on national unity, sacrifice, and civic identity, is another fundamental value. The Arch will contribute to this

purpose by celebrating the unity of the nation over the past 250 years. In addition, the Parkway's diverse recreational opportunities are a fundamental resource, and the Arch will introduce a new recreational experience while also supporting safer access for visitors using Memorial Circle.

Two of the Parkway's fundamental resources and values that will be affected by the proposed Arch are discussed in more detail in the sections that follow. These include the Parkway's iconic vistas and views, particularly those overlooking the Potomac River and adjacent commemorative features, which help define the Parkway's scenic and symbolic character, and the Arlington Memorial Bridge/Memorial Avenue Corridor, a fundamental resource that serves as a physical and symbolic link to the sacrifices and valor of the nation's military personnel and their families.

Other fundamental resources, such as the Potomac River shoreline and gorge, will experience minimal effects if any, as no direct impacts on the shoreline are anticipated and only limited impacts, if any, on the soundscape and wildlife and habitat are expected. Great Falls Park, another fundamental resource, will not be affected by the project.

NON-IMPAIRMENT DETERMINATION

This determination has been prepared for the selected action. To evaluate the potential for impairment on park resources, the NPS relied on the analysis in Chapter 3 of the Triumphal Arch Revised EA and the Revised Finding of No Significant Impact (FONSI), which are incorporated here by reference. The EA evaluated the selected action's impacts on historic views, cultural landscapes and historic districts, archaeology, water resources, traffic and circulation, visitor experience, soundscape and night skies. As noted above, visitor experience and traffic and circulation are not resources subject to the non-impairment standard and are therefore not discussed further here. The NPS also relied on information developed through the National Historic Preservation Act Section 106 process for the non-impairment determination for the Cultural Resources analysis. As part of that process, the NPS prepared a Final Assessment of Effect (AOE) dated August 28, 2026, which concluded that the undertaking will result in adverse effects on certain historic properties. The Final Assessment of Effect, along with the associated Section 106 consultation materials, are incorporated here by reference. The EA considered, but did not analyze in detail, limited impacts on other Parkway resources subject to the non-impairment standard, including ethnographic resources, soils, vegetation, wildlife (including threatened and endangered species), air quality, and water quality. As described in the EA, some resources, such as soils and air quality, may experience temporary construction-related impacts during construction of the Arch and installation of utilities; however, these effects will be small in scale, temporary, and confined to the construction period, and will not result in regulatory exceedances or in lasting change to these resources. Thus, there is no potential for impairment of these resources. In other cases, potential effects may be long-term but extremely minor in scale and intensity or limited to a very small area. For example, long-term impacts to vegetation and to wildlife will be negligible and will not represent meaningful ecological impacts, resulting in no potential for impairment. Overall, because impacts to resources not discussed in detail in the EA

will be minor or negligible, and many will be temporary, they do not rise to the level of impairment and are not discussed further here.

The following sections discuss resources and values that are subject to the non-impairment standard and that are carried forward for analysis in the EA and the AOE.

Cultural Resources – Historic Views

Historic views are a fundamental resource and value of the Parkway. The Parkway was intentionally designed to provide sweeping vistas of the Potomac River corridor and to maintain visual relationships among nationally significant memorials and commemorative landscapes.

During construction of the Triumphal Arch and installation of associated utilities, localized and temporary visual intrusions will occur in the immediate project area. Construction equipment, staging areas, and short-term ground disturbance will be visible within Memorial Circle and in areas where utilities are being installed. These effects will be confined to the construction zones and will be temporary. Therefore, the anticipated construction impacts do not rise to the level of impairment.

In the long term, the Triumphal Arch will alter several historic views within the Memorial Avenue corridor, including the longstanding axial alignment between Arlington House and the Lincoln Memorial.[1] The Arch's placement within this designed vista will partially obstruct reciprocal views and reduce the clarity of this sightline. Additional partial obstructions will occur between the Arlington Hemicycle and the Lincoln Memorial and in east–west and north–south views across Memorial Circle, where the structure will introduce a new vertical focal element and diminish the sense of openness.

Importantly, previous planning documents provide context for evaluating impairment by considering whether the selected action is consistent with Memorial Circle's historic design intent. Early concepts for Memorial Circle included prominent architectural features, specifically, two large commemorative columns, which would have introduced substantial vertical elements in the same location as the Arch and would themselves have reframed historic sightlines. These unbuilt components demonstrate that significant structural features were once envisioned as part of the Circle's monumental composition. Within this context, the Arch's modification of views is compatible with historic plans and does not represent a fundamental departure from the area's designed framework.

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[1]The Lincoln Memorial is administered by the National Mall and Memorial Parks, a separate NPS unit distinct from the Parkway. The selected action would not result in any physical changes to the Lincoln Memorial; however, it would affect views from the Memorial and from other locations within the National Mall and Memorial Parks unit. A separate non-impairment determination for the Lincoln Memorial or for the National Mall and Memorial Parks is not required because the only anticipated effects on these resources involve views and cultural landscapes, and those effects are fully evaluated within this document.

Under NPS Management Policies, impairment occurs only when an impact will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. Here, the key characteristics that define the Parkway's historic views remain discernible and intact and available to enjoy. Most character-defining vistas along Memorial Avenue and overlooking the Potomac River, as described in the *Foundation Document*, will remain unchanged. While the Arch may be visible in certain viewpoints, such as from the U.S. Marine Memorial and the Netherlands Carillon, it does not diminish or obstruct the broader commemorative views from those locations and therefore does not result in impairment. Although the Arch modifies or frames certain axial views, those views are not eliminated. The Lincoln Memorial, Arlington House, and other major landmarks remain visible in broader panoramic views, and the corridor's spatial organization, including its procession, axial relationships, and expansive landscape structure, remains clearly understood within its designed context. Visitors will continue to have the opportunity to perceive and interpret the historic setting as a unified commemorative corridor linking Arlington House, the Cemetery entrance, Memorial Avenue, and the Lincoln Memorial.

Because the Triumphal Arch alters some historic views but does not fundamentally compromise their integrity, and because the Parkway's defining scenic and commemorative qualities remain intact, these changes do not constitute impairment.

Cultural Resources – Cultural Landscapes and Historic Districts

The designed landscapes within the project area, including the Memorial Avenue Corridor, are a fundamental resource and value of the Parkway, which was created to maintain strong visual relationships among nationally significant memorials and commemorative landscapes. As described in Chapter 3 and Appendix C of the Revised EA, and in Chapter 4 and Appendix D of the Final AOE dated August 28, 2026, the selected action will affect multiple overlapping cultural landscapes and historic districts, along with contributing historic features that define their significance.

Construction of the Triumphal Arch and associated utilities will result in short-term, localized disturbances to contributing features within these landscapes and districts, including temporary ground disturbance, equipment presence, and limited work zones. These effects will be confined, temporary, and incremental, and therefore do not rise to the level of impairment. Installation of new utilities on or within historic bridges, if it occurs, will most likely occur alongside existing utility lines and will not alter the character-defining features or qualities that convey the bridges' historic significance. Installation of utilities in new locations on bridges, if needed, will leave the bridges' appearance unchanged once surfaces are restored, and any exterior additions will be minor and incremental. These changes will not diminish the bridges' integrity of design, materials, workmanship, or setting, nor will they measurably affect their contribution to the surrounding cultural landscape. Accordingly, these effects will not constitute an impairment of these historic resources.

In the long term, the Triumphal Arch will introduce a prominent vertical structure into landscapes historically defined by low horizons, open spatial organization, and horizontally oriented views. It will interrupt some long views along the George Washington Memorial Parkway, modify the axial procession of the Memorial Avenue Corridor, appear within cross-river vistas from the Lincoln Memorial, and become visible from Arlington House and parts of Arlington National Cemetery. These changes represent adverse effects but do not constitute impairment, for the same reasons discussed above in the context of historic views.

As discussed above, Memorial Circle's design history provides important context for evaluating whether the project could result in impairment of cultural landscapes and historic districts. The 1924 Arlington Memorial Bridge Commission General Plan, prepared by McKim, Mead & White proposed two monumental columns positioned on opposite sides of the east–west ceremonial axis at Columbia Island, where Memorial Circle is today, and later plans continued to identify the Circle as an appropriate location for architectural expression. This history demonstrates that a prominent vertical structure in this location is compatible with the site's evolving design intent. The introduction of the Arch, though distinct from earlier proposals, is consistent with the Circle's longstanding purpose to accommodate major architectural elements.

Under the selected action, despite permanent modifications to view composition and visual hierarchy, the defining characteristics of the cultural landscapes will remain intact and clearly interpretable. The primary spatial organization of the Parkway, Memorial Avenue, and the cross-river alignment will continue to be understood, and major landmarks such as the Lincoln Memorial, Arlington House, Arlington National Cemetery, the Potomac River, and surrounding parklands will remain visible in broader panoramic views. Historic visual relationships will be altered but not eliminated.

The project will also provide a beneficial effect by creating new elevated viewing opportunities from the Arch, enabling visitors to better understand the alignment of major landmarks and the ceremonial character of the Potomac River corridor, consistent with this fundamental resource and value of the Parkway.

Because the selected action does not fundamentally compromise the integrity of these cultural landscapes, or eliminate their ability to be enjoyed, understood, or appreciated by current or future generations, the project will not result in impairment.

Cultural Resources – Archaeology

Construction of the Triumphal Arch and associated landscaping, grading, stormwater features, and utilities will involve both temporary and permanent ground disturbance within Memorial Circle and within the broader project area where utilities are installed. These activities could disturb archaeological resources where they are present.

To evaluate the potential for impacts to archaeological resources within Memorial Circle, NPS completed a cut-and-fill analysis and subsequent geomorphological investigation. These studies determined that Memorial Circle is underlain by substantial historic fill and identified no intact archaeological sites within the area that will be affected by construction of the Arch. Based on these findings, the potential for impacts to archaeological resources within Memorial Circle is low, and no additional archaeological investigations are warranted. Utility-related impacts will be avoided through project design, including routing utilities within existing roadways or adjacent previously disturbed areas where archaeological resources have not been identified. Because the studies indicate that no intact archaeological sites are present within the construction footprint and no archaeological resources are anticipated in areas where utilities will be installed, the selected action will not impair archaeological resources.

Water Resources

The Selected Action will replace the central lawn at Memorial Circle with an impermeable surface, resulting in localized changes to infiltration. These changes, along with any short-term dewatering or subsurface construction activities, will be managed using standard geotechnical practices and conducted in compliance with District and federal requirements. Although perched groundwater may temporarily mound or become pressurized during construction, such conditions are typical of Potomac terrace soils and can be effectively addressed through routine construction monitoring. Thus, the short-term impacts will not result in impairment.

Because the project does not introduce long-term modifications to aquifer inputs, flow paths, or groundwater availability, the integrity of groundwater resources will remain intact, and opportunities for their continued natural function will not be diminished. Considering the severity, duration, timing, and overall context of the action, groundwater effects will be limited and will not meaningfully affect any resource essential to park purposes or natural system integrity. Therefore, the action will not result in impairment of groundwater resources.

Although the project will increase impervious area and therefore runoff volumes, stormwater will continue to be captured and conveyed through existing, and, if necessary, upgraded, drainage infrastructure and bioretention structures designed to accommodate roadway discharge. With appropriate stormwater design and adherence to District and federal requirements, the additional runoff will not alter Potomac River conditions, sedimentation patterns, or long-term water quality. The project will not affect riverine hydrology, tidal patterns, or flood risk. Because drainage will remain fully contained within engineered systems, the project will not impair surface water resources.

Noise

Construction activities will generate elevated but temporary noise from heavy equipment, including cranes, excavators, concrete mixers, trucks, and intermittent pile-driving operations.

Although maximum noise levels from such equipment can be high, the loudest activity, pile driving, will be substantially reduced through the mandatory use of noise blankets incorporated into the construction design. Modeling shows that these blankets will reduce noise levels across the project area, and that most areas outside the immediate construction zone will largely remain below 57 dBA. Pile driving, the loudest construction activity, will occur only during a discrete phase of construction; thus, higher levels will not persist for the full duration of the project, and subsequent activities will generate lower noise.

Some construction noise will remain audible across the Potomac River on NPS lands near the Lincoln Memorial and adjacent areas; however, the combination of distance, existing urban ambient noise, natural attenuation from topography, and the temporary nature of construction will prevent disruption or lasting changes to the acoustic environment. With noise blankets in place, no substantial propagation of noise toward the Lincoln Memorial or other commemorative landscapes is expected. Although nighttime conditions may make construction noise more perceptible due to lower background levels, such effects will remain intermittent, localized, and confined to the construction period.

Given the short-term duration of construction activities, the demonstrated effectiveness of noise-attenuation measures, and the already high baseline of urban ambient noise, noise generated by the project will not disrupt visitor use, or cause lasting changes to the Parkway's acoustic environment. Because all noise effects will be temporary, minimized, and will not result in permanent degradation of the soundscape or diminish visitors' ability to experience or appreciate the affected resources, the noise impacts will not rise to the level of impairment.

Night Skies

Night skies within Memorial Circle are already characterized by a bright, urban nighttime environment shaped by regional skyglow, existing monument lighting, roadway illumination, and aviation activity. The proposed lighting associated with the Triumphal Arch, including illumination of Memorial Circle, the Arch walls, and the FAA-required lighting at the roof level, will introduce an additional prominent vertical light source and increase localized skyglow. The project incorporates fully shielded luminaires around Memorial Circle and tapered illumination on the Arch walls to limit light spill and minimize unnecessary brightness, and these design features are consistent with existing lighting practices used for nearby memorials and monumental structures. Although the statuary lighting and torch will be visible from portions of the surrounding ceremonial landscape and will contribute to skyglow, the incremental increase in brightness will not meaningfully alter nighttime functioning or diminish opportunities to perceive and appreciate the area's commemorative qualities. Because the affected environment already experiences high ambient light levels and because project lighting includes lighting intentionally designed to limit skyglow and off-site glare, the anticipated effects will not result in permanent degradation of night-sky quality or impair the nighttime experience of the Parkway's

cultural landscapes. For these reasons, the lighting associated with the Arch would not rise to the level of impairment.

APPENDIX D

TRIUMPHAL ARCH PROJECT

PUBLIC COMMENT RESPONSE SUMMARY REPORT

A public comment period for the proposed Triumphal Arch project was conducted from June 5, 2026, to June 15, 2026, and again July 10, 2026, to July 30, 2026, in accordance with the National Historic Preservation Act (NHPA) Section 106 regulations, 36 CFR Part 800. As part of this process, the National Park Service (NPS) initiated consultation, provided public access to project materials, and accepted written comments submitted through the Planning, Environment, and Public Comment (PEPC) system and other channels. This public comment period allowed consulting parties, organizations, and members of the public to review the Assessment of Effects and draft Programmatic Agreement and offer feedback on potential impacts to historic properties, consistent with the requirements of 36 CFR Part 800. The NPS received a total of 100,936 comments during the June public comment period. During the subsequent July comment period, NPS received 6,254 comments.

To develop this report, the NPS downloaded the public comments from PEPC and other channels and used artificial intelligence (AI) tools to organize the comments by subject matter themes. NPS staff with expertise in the subjects involved developed and tested tailored prompts to ensure the AI outputs accurately reflected the full range of issues raised by commenters. Using these AI-generated digests as a foundation, NPS subject matter experts reviewed the comments, synthesized them into broader themes, and prepared this comment report.

CULTURAL RESOURCES

Lincoln Memorial

Adverse Effects

Some commenters asserted that the proposed arch would block, disrupt, or destroy the intentional historic sightline connecting the Lincoln Memorial, Arlington Memorial Bridge, Arlington National Cemetery, and Arlington House, thereby undermining the nationally significant symbolic corridor representing unity and reconciliation. Some commenters asserted that the arch would permanently alter or destroy the intended symbolic alignment and relationship between the Lincoln Memorial and Arlington House, the impacts of which would be irreversible and impossible to mitigate.

Some commenters asserted that the height of the arch would exceed the Lincoln Memorial by more than double and would be visually incompatible with the surrounding skyline. Some commenters asserted that the arch would visually dominate, dwarf, overshadow, or visually

compete with the Lincoln Memorial due to its height and massing, overwhelming the Lincoln Memorial's visual prominence, historic setting, and restrained dignity.

Some commenters asserted that construction activities would disrupt the visitor experience at the Lincoln Memorial and sever important symbolic and visual connections within the landscape.

Some commenters asserted that the project would intrude upon and degrade the contemplative, intentionally designed civic landscape, replacing quiet dignity with spectacle and compromising the integrity of setting, feeling, and association.

Some commenters asserted that the design resembles European triumphal arches, or imperial or authoritarian monuments, and is not rooted in American traditions, diminishing the symbolism and integrity of the Lincoln Memorial and its surrounding landscape.

Some commenters suggested that the arch opening should be aligned so visitors on the bridge can see the full Lincoln Memorial through the arch and should honor both the Civil War veterans at Arlington and the 250th.

NPS Response: The Triumphal Arch would partially obstruct some of the views identified in public comments. Even in locations where the Arch would substantially intrude into the viewshed or prevent an unobstructed view, however, the views would not be fully blocked. Because the historic buildings would remain visible and in their designed locations, the planned historic alignment would still be legible and understood.

The NPS evaluated the scale, massing, and visibility of the Arch relative to historic properties, as well as potential effects on the integrity of setting, feeling, and association in the Revised Assessment of Effects. The analysis concluded that the proposed Arch would alter views and the historic setting and therefore would result in an adverse effect under 36 CFR 800.5(a)(1).

The proposed Triumphal Arch is neoclassical in design. While there are currently no other neoclassical arches in Washington, D.C., numerous buildings, monuments, and memorials in the city feature neoclassical architecture, including the Lincoln Memorial.

The size of the proposed Arch allows key views to be framed through the Arch's opening, celebrates and reflects the 250 years of American independence, and complements Memorial Avenue as a ceremonial entrance to Washington.

Proposed Alternatives or Mitigations related to the Lincoln Memorial

Some commenters asserted that alternatives preserving existing open views, including the symbolic axis between the Lincoln Memorial and Arlington House, should be prioritized.

Some commenters asserted that the NPS's adverse effect finding underscores the severity of impacts and that proposed mitigation measures are insufficient to address those adverse effects to these resources.

Some commenters asserted that the proposed arch should be relocated, scaled down, or redesigned to avoid excessive height, visual intrusiveness, or gold ornamentation. Some commenters asserted that any structure should not exceed the height of the Lincoln Memorial, with some recommending strict limits such as a maximum height of approximately ten feet.

NPS Response: The size of the proposed Arch ensures that key views are preserved and framed through the Arch's opening; celebrates and reflects the 250 years of American independence; and complements Memorial Avenue as a ceremonial entrance to Washington.

Arlington National Cemetery

Adverse Effects

Some commenters asserted that the proposed arch is disrespectful to Arlington National Cemetery, with some describing it as desecrating sacred ground, trivializing or commercializing a solemn burial landscape and experience or constituting a symbolic affront to veterans and their families.

Some commenters asserted that the arch would block, diminish, or permanently disrupt the deliberate symbolic sightline connecting Arlington National Cemetery, the Lincoln Memorial, Arlington Memorial Bridge, and Arlington House—an alignment representing national unity, remembrance, and reconciliation. Some families with loved ones buried in Arlington National Cemetery expressed grief and distress over the potential loss of the sightlines that hold personal and symbolic meaning.

Some commenters, including veterans and military families, expressed emotional harm, personal offense, and deep concern that the project would dishonor the memory of the more than 400,000 service members interred at Arlington National Cemetery. Some commenters noted that views of the President John F. Kennedy Gravesite and eternal flame may be compromised from the bridge and ceremonial approach.

Some commenters asserted that the arch would visually overshadow graves, funeral processions, and the contemplative setting of Arlington National Cemetery, where up to 30 funerals per day could be adversely affected. Some commenters asserted that the increase in traffic from the arch would disrupt funeral processions.

Some commenters asserted that construction associated with the arch, including noise, would disrupt cemetery operations, diminish tranquility and solemnity, create safety and traffic concerns, and contribute to fears of politicization of a sacred landscape.

Some commenters asserted that the triumphal motifs associated with the arch could be perceived as glorifying war rather than honoring duty, sacrifice, and military service, the values embodied at Arlington National Cemetery.

Some veterans' organizations and individual servicemembers expressed a lack of support for the project, emphasizing that Arlington National Cemetery should remain a place of humility and reflection rather than spectacle.

Some commenters noted that the Arch would increase visitors to the area which would disrupt the solemnity of the area.

Commenters asserted that NPS did not fully consider potential impacts to the following historic properties within Arlington National Cemetery: Sections 30, 36A, 51, 53, 55, 56, 57, 60, 66, 73, 74, 75, and 76, including the Taft Memorial in Section 30 and General Colin Powell's grave in Section 60.

NPS Response: The NPS acknowledges the sensitivity of the historic, commemorative, and funerary landscape surrounding Arlington National Cemetery and has carefully evaluated effects on setting, feeling, association, and views. As documented in the Revised Assessment of Effects, the proposed Arch would alter views and the historic setting of multiple affected properties, resulting in a determination of adverse effect under 36 CFR 800.5(a).

The NPS has assessed construction noise, traffic, and access conditions. Construction noise and operational effects would be temporary or limited in duration and would be minimized through noise curtains. The project incorporates noise-attenuation measures, including noise blankets, which modeling demonstrates would substantially reduce peak construction sound levels and limit audible interruptions throughout most areas of Arlington National Cemetery. Any noise effects would cease upon completion of construction.

The NPS has evaluated potential impacts on views, visual character, and symbolic sightlines and found that the undertaking would alter established historic view relationships, contributing to the adverse effect determination. Effects on the specific sections of the Cemetery identified above were evaluated in the Final Assessment of Effect dated August 28, 2026. Also, the symbolism of the Arch and its relationship to the cemetery landscape were considered as part of the effects analysis. Interpretive meaning and visitor experience vary, but the Section 106 determination is based on effects to historic properties as defined in regulation.

The NPS has also reviewed potential implications for funeral operations, circulation, and cemetery access. The project does not alter cemetery operations or burial activities. Funeral processions would continue to occur, including entering through the Arlington Hemicycle.

Beneficial Effects

Some commenters described the arch as an appropriate tribute near Arlington National Cemetery.

NPS Response: The location of Memorial Circle was chosen specifically as a significant ceremonial gateway and to complement the axial views along the Memorial Avenue Corridor.

Proposed Alternatives or Mitigations Related to Arlington National Cemetery

Some commenters asserted that the arch should be relocated to an alternative site away from Arlington National Cemetery to avoid interference with funeral operations, visitor experience, and the respectful character of the cemetery landscape.

Some commenters asserted that funds should be redirected toward cemetery maintenance, veteran services, healthcare, improvements to existing memorials, or enhancing interpretation at existing memorials to celebrate the 250th, rather than constructing a new monument near Arlington National Cemetery.

Some commenters asserted that any action must protect the symbolic sightline connecting Arlington National Cemetery, Arlington House, Arlington Memorial Bridge, and the Lincoln Memorial, emphasizing that no structure should interfere with this historic visual axis.

Some commenters asserted that smaller, discreet, or landscape-based commemorations, such as gardens, fountains, walls, benches, reflective spaces, or plantings, would be more appropriate near Arlington National Cemetery and would preserve the solemnity of the setting.

One commenter proposed a very small veterans memorial arch as a less intrusive commemorative option.

NPS Response: As part of the Section 106 process, the NPS evaluated a full range of avoidance, minimization, and mitigation measures. Options requiring relocation or major changes to the Arch's scale, footprint, or purpose were considered but dismissed because they would fundamentally alter the undertaking.

Arlington House

Adverse Effects

Some commenters asserted that the proposed arch would block, disrupt, or ruin the intentional historic sightline between the Lincoln Memorial and Arlington House, a symbolic post–Civil War reconciliation axis designed to represent national unity. Some commenters asserted that historical documentation emphasizes the intentionality of the axis, designed to help heal the wounds of the Civil War, and that the arch would completely obstruct this critical view.

Some commenters asserted that the scale and placement of the arch would visually overwhelm Arlington House, describing it as out of scale, incongruent, dwarfing, overwhelming, incompatible with, or sacrilegious in relation to the historic property. Conversely, some commenters expressed concern that the arch would create an inappropriate visual emphasis on Arlington House, effectively framing the former home of Confederate General Robert E. Lee in a way they viewed as insensitive or historically inappropriate.

NPS Response: NPS acknowledged in the Assessment of Effect that the proposed action would result in adverse effects to historic properties. The Assessment of Effect determined that the undertaking would result in adverse effects to the Arlington House Historic District, Arlington House (Robert E. Lee Memorial), and Arlington House Cultural Landscape because the Arch would alter contributing views eastward toward.

Proposed Alternatives or Mitigations Related to Arlington House

Some commenters asserted that smaller-scale alternatives or alternate locations should be considered to avoid adverse effects to the Arlington House viewshed.

Some commenters asserted that alternative design concepts should focus on framing the historic view without blocking it.

NPS Response: During and prior to the design process, various smaller arch heights were evaluated. The smaller arches were ultimately dismissed because they would have had greater impacts on the cultural landscapes, specifically the views between the Lincoln Memorial and Arlington National Cemetery. The smaller designs fully obstructed this view and did not create any new viewing opportunities, by contrast to the proposed Arch, which would allow a less obstructed view through its central opening. In addition, because the Arch is intended to celebrate 250 years of American independence, the smaller heights were not considered representative of this milestone.

In addition, the location of Memorial Circle was chosen specifically as a significant ceremonial gateway and to complement the axial views along the Memorial Avenue Corridor.

George Washington Memorial Parkway and Memorial Circle

Adverse Effects

Some commenters asserted that the proposed arch would irreparably damage the historic and symbolic landscape of Memorial Circle and the George Washington Memorial Parkway, asserting that inserting a massive vertical structure into an intentionally horizontal vista would erase the area's established character. One commenter stated that the National Register nomination identifies the protected historic property as the constructed Memorial Bridge composition, including the low neoclassical bridge, Columbia Plaza's circular lawn, the four 35-foot pylons, Memorial Avenue, Boundary Channel Bridge, and associated landscape and

circulation features, and expressed concern that introducing a significantly larger and fundamentally different commemorative structure would compromise the design integrity, setting, feeling, and association of this nationally significant cultural landscape.

Some commenters asserted that the project would worsen traffic congestion within Memorial Circle, create pedestrian and vehicle hazards on the George Washington Memorial Parkway, block key sightlines, disrupt ceremonial routes, and result in extended construction impacts, with some describing scenarios such as long work hours and years of disruption to surrounding communities and park users.

Some commenters asserted that the arch is alien, oversized, inconsistent with the McMillan Plan, visually jarring, and hazardous within a highspeed traffic circle central to circulation along the Parkway, and that the proposal includes insufficient planning for increased visitation to Memorial Circle, inadequate pedestrian safety measures, and insufficient parking and circulation capacity along the Parkway.

One commenter stated that the project does not fit within the landscape of Lady Bird Johnson Park, which provides the broader landscape setting that frames and supports Memorial Circle along the Parkway corridor.

One commentor asserted that NPS inadequately considered *The Secretary of the Interior's Standards for Restoration* standards, including standard number ten: "Designs that were never executed historically will not be constructed."

Commenters asserted that the project would have an adverse impact on major events in the area (e.g., Cherry Blossom 10 Mile Run, Marine Corps Marathon) because of traffic and other congestion.

NPS Response: The NPS acknowledges that the Triumphal Arch would introduce a prominent new vertical structure into Memorial Circle and the George Washington Memorial Parkway, and that this would alter the area's historically horizontal visual character. As documented in the Revised Assessment of Effects, the project would result in an adverse effect on historic properties due to changes in views, setting, and the character-defining features of the cultural landscapes.

The NPS evaluated consistency with the parkway's design history, including early planning concepts for Columbia Island and Memorial Circle, which included more vertical forms. This history demonstrates that a vertical element is compatible with the site's planning context.

Traffic, pedestrian circulation, and safety were thoroughly analyzed. Construction would generate temporary disruptions, but these would be managed through established Maintenance of Traffic measures. Long-term improvements, including full signalization, enlarged refuge islands,

raised crossings, and simplified circulation, would reduce conflict points and improve safety and mobility for all users, including pedestrians, cyclists, and motorists.

The NPS analyzed the project's compatibility with Lady Bird Johnson Park and acknowledges that the Arch would change views within the broader river landscape. However, the fundamental landscape context would remain discernible.

The NPS reviewed the Secretary of the Interior's Standards and determined that while the Standards do not prohibit new construction, the introduction of a large structure results in adverse effects. These effects are being addressed through mitigation measures.

Overall, although the undertaking would alter long-standing visual relationships and contribute to adverse effects under Section 106, it would also provide long-term safety and circulation improvements and a managed public space within an already highly engineered transportation setting.

Beneficial Effects

Some commenters supported the idea of enhancing Memorial Circle, with a few noting that the area "needed something," and some expressing enthusiasm about decorative elements associated with the proposed arch.

Some commenters noted that planned transportation improvements (e.g. safer crossings, wider trails) are beneficial and should proceed independently of the arch.

NPS Response: Early plans for Memorial Circle envisioned a grand, highly symbolic landscape that integrated Arlington Memorial Bridge with a formal traffic ellipse on Columbia Island. The addition of the Arch is consistent with this vision.

Modeling conducted for the project indicates that the proposed transportation improvements would enhance overall safety and circulation in and around Memorial Circle, including improved pedestrian crossings, reduced conflict points, and more predictable traffic operations. Some elements of the transportation network refinements have also been evaluated and approved in prior planning efforts and will advance as funding becomes available. See Appendix F of the Revised EA for a list of previously approved projects.

Proposed Alternatives or Mitigations Related to George Washington Memorial Parkway and Memorial Circle

Some commenters asserted that improvements to existing infrastructure on the Parkway and Memorial Circle should be prioritized instead of constructing a large new monument.

Some commenters asserted that smaller commemorative features or landscape-based enhancements and context sensitive design alternatives would be more appropriate for the historic setting of Memorial Circle and the Parkway.

NPS Response: The proposed undertaking would improve existing infrastructure around Memorial Circle by updating traffic flow and circulation, providing long-term safety and mobility benefits for pedestrians and bicyclists. New fully signalized crossings, simplified controls, and expanded refuge islands would reduce conflict points and create more intuitive travel paths. Improved sight distance and design features such as raised crossings, curb extensions, and coordinated wayfinding would further enhance driver awareness and support safe, orderly movement.

The size of the proposed Arch celebrates and reflects the 250 years of American independence and complements Memorial Avenue as a ceremonial entrance to Washington.

National Mall

Adverse Effects

Some commenters asserted that the proposed arch is incompatible with the character of the National Mall, conflicting with its symbolic purpose, open vistas, longstanding neoclassical design vocabulary, historic viewsheds, axial relationships, and commemorative purpose. The arch was described by some as "ruining the Mall," "out of place," "un-American" because it imitates European triumphal monuments, "visually at odds," or "not reflective of American values." Commenters asserted that its visual and symbolic character would disrupt the Mall's cohesive historic setting and diminish the solemn and democratic character associated with the National Mall.

Some commenters asserted that the existing monuments on the National Mall should be preserved and maintained rather than overshadowed or visually competed with by a new structure.

Some commenters expressed concern that the project erodes established planning norms for the National Mall.

NPS Response: The Triumphal Arch design is consistent with Memorial Circle's design history and its unrealized monumental intent. Early 20th-century plans for Columbia Island, now Memorial Circle, envisioned a grand, symbolically charged landscape that reinforced the ceremonial alignment between Arlington Memorial Bridge and Arlington National Cemetery. Over several decades, the Commission of Fine Arts reviewed concepts including a large elliptical plaza framed by formal cross-axes, monumental pavilions, and prominently, two columns representing national reunion. Although successive design revisions in the 1930s scaled back these ambitions, reducing three planned circles to one and replacing proposed monumental

columns with smaller sculptural pavilions, the original vision of a major feature anchoring the Circle was never fulfilled. The Triumphal Arch would continue this historic lineage by introducing a focal point that reflects the site's intended character and celebrates 250 years of American independence.

NPS has complied with all required planning reviews and approvals.

Beneficial Effects

Some commenters asserted that the arch could contribute to the national 250th anniversary or might "add something new" to the National Mall.

NPS Response: The purpose of the undertaking is to celebrate 250 years of American independence. The arch is not designed to perpetuate the memory of any individual, group, event or other significant element of American history. It is instead designed to symbolize the profound blessing of living in this great country, America. It symbolizes perseverance, strength, and greatness. It is a monument to the future of America. Regardless of the symbolism that any one person attaches to it, the arch will be used for the primary purpose of presenting an inspiring ceremonial gateway to Washington, D.C.

Proposed Alternatives or Mitigations Related to the National Mall

Some commenters asserted that smaller commemorations, temporary installations, or designs more appropriate to the American character of the National Mall should be considered.

Some commenters suggested that any new monument should be sited away from the Mall or designed to complement the Mall's existing commemorative landscape.

NPS Response: Smaller-scale alternatives of the Triumphal Arch were considered but not chosen because smaller arches would block more of the view as the arch itself would not be large enough to see through and frame the Lincoln Memorial or Arlington House. The proposed height of the Arch is an effort to frame historic locations from specific viewpoints. In addition, the location of Memorial Circle was chosen specifically as a significant ceremonial gateway and to complement the axial views along the Memorial Avenue Corridor.

National Historic Landmarks

Adverse Effects

Some commenters asserted that NPS has not minimized impacts to National Historic Landmarks (NHLs) as required under Section 110(f) of the National Historic Preservation Act, noting that both the Fort Myer Historic District and Fort Myer Quarters 1 are NHLs, and that the NPS incorrectly conflated the Quarters 1 NHL and the Fort Myer NHLD. Commenters further observed that other NHLs in the broader APE received no adverse effect findings. One

commenter requested that NPS provide the visual and methodological basis for its findings regarding impacts to NHLs and revisit those findings if the final design, height, lighting, or silhouette changes. Some commenters also asserted that NPS failed to analyze potential effects on the Old Naval Observatory NHL.

NPS Response: NPS has revised the Assessment of Effects to identify Fort Myer Historic District and Fort Myer Quarters 1 as National Historic Landmarks and has clarified the methodology supporting the findings. The revised Assessment of Effects recognizes that the Fort Myer Historic District and Quarters 1 at Fort Myer are separately designated NHLs, and evaluates these NHLs individually based on the characteristics that contribute to their respective national significance. The Assessment of Effects identifies adverse effects to the Fort Myer Historic District, while the assessment of Quarters 1 concludes that the undertaking would not adversely affect the property because the proposed Arch would not be visible from that NHL.

The basis for NPS's findings regarding impacts to NHLs, including findings of no adverse effects, are found in the Assessment of Effects.

NPS updated the Assessment to address the Old Naval Observatory NHL.

The NPS assessed whether the proposed undertaking would directly and adversely affect each NHL within the APE. The analysis recognized that the significance of many of these properties is tied not only to individual buildings or structures, but also to their setting, views, vistas, ceremonial approaches, designed landscapes, and relationships to the National Mall, Potomac River, Arlington National Cemetery, Arlington House, and the monumental core. The effects analysis determined that adverse effects to NHLs would generally result from visual, spatial, and nighttime changes rather than direct physical alteration. In particular, the analysis identified adverse effects where the proposed Arch would be visible within significant viewsheds or would alter contributing views, vistas, setting, feeling, association, or nighttime visual character.

The NPS determined that the purpose and need for the undertaking requires the proposed Arch to be located at Memorial Circle. The NPS considered various measures to avoid or minimize impacts to NHLs, including smaller Arch heights, relocation, no-build, or elimination of the proposed vertical commemorative feature, but these alternatives were not carried forward because they would either have greater impacts to historic properties or would not meet the location-dependent purpose of the undertaking. Smaller Arch designs were considered but not selected because they would result in greater obstruction of historic views between the Lincoln Memorial and Arlington National Cemetery. By contrast, the proposed proportions and central opening retain views through the structure. Relocating the Arch outside Memorial Circle would avoid some adverse effects, but it would also sever the undertaking from the historic planning precedent that provides the rationale for the project. For that reason, the NPS determined that avoidance through relocation would constitute a materially different undertaking rather than a reasonable avoidance measure. Because adverse effects on all NHLs within the APE could not

be fully avoided while still meeting the undertaking's purpose and need, the NPS focused on minimization and mitigation measures that could reduce, manage, document, or compensate for harm to NHLs and other historic properties. These measures include lighting controls to reduce nighttime visual effects; construction-period protection measures; vibration, noise, access, and traffic controls; archaeological identification, evaluation, and treatment; documentation of affected historic properties and cultural landscapes; viewshed documentation; interpretation of the Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, and cross-Potomac commemorative corridor; landscape restoration; and visitor-orientation and pedestrian-safety improvements. Measures incorporated into the project design also reduce adverse effects on NHLs, including the use of shielded and low spill lighting and required noise reduction measures during pile driving.

Accordingly, the Department has determined that the proposed Arch design, together with the avoidance and minimization measures reflected in the record, will minimize harm to NHLs to the maximum extent possible, consistent with Section 110(f) of the National Historic Preservation Act.

Historic Bridges

Adverse Effects

Some commenters asserted that the proposed arch would harm historic bridges, particularly Arlington Memorial Bridge, by introducing safety risks, construction vibration, and the potential for physical damage to historic stonework and structural elements.

Some commenters asserted that construction associated with the arch could result in the loss of mature trees and landscape features that contribute to the historic context of Memorial Bridge and its approaches.

Some commenters asserted that the arch would violate principles of the McMillan Plan, which intentionally rejected massive entrance columns to preserve the horizontal skyline and the architectural harmony of the bridge and its surrounding cultural landscape.

Some commenters asserted that the sightlines connecting Arlington Memorial Bridge with the Lincoln Memorial, Arlington House, and other components of the monumental core are irreplaceable, and that the arch would destroy the historic setting, feeling, and association that these bridges were designed to support.

Some commenters expressed concern about the loss of the historic granite pylons and the integrity of the Memorial Avenue Corridor.

NPS Response: During construction, significant historic structures, like Arlington Memorial Bridge, would have vibration monitors as a best management practice to identify and mitigate

potential damage from construction impacts. Vibration monitors are commonly used during construction activities near sensitive historic sites and are used often throughout Washington.

No trees are expected to be removed during construction of the Arch. If any vegetation or trees are accidentally damaged or unexpectedly need to be removed, they will be replaced with similar plants or trees.

The Arch aligns with the McMillan Plan and other planning documents that anticipated a significant feature in Memorial Circle. Because the plans did not specify an exact design, they allow for the Arch to be located within the circle.

The Arch would introduce permanent changes to some long-familiar views, including interruption of the historic axial sightline between the Lincoln Memorial and Arlington House along Arlington Memorial Bridge. While the sightlines along Arlington Memorial Bridge would be altered, the introduction of the Triumphal Arch at Memorial Circle would provide opportunities to view the historic sightlines from the Arch's observation deck, with new elevated views down the bridge corridor.

The project would not affect the historic granite pylons or diminish the physical integrity of the Memorial Avenue Corridor. These small-scale contributing features, including the granite curbstones, granite blocks, and Memorial Circle pylons, would remain in place and unaltered under the proposed action.

Proposed Alternatives or Mitigations Related to Historic Bridges

Some commenters suggested restoring or maintaining existing historic bridges and resources instead of constructing new monuments.

NPS Response: Any potential impacts to historic bridges associated with utility installation will be closely monitored, including the use of vibration monitoring and other best management practices to avoid damage to historic fabric. The project does not preclude, impede, or otherwise affect ongoing or future restoration or maintenance needs for the historic bridges, as their integrity of design, materials, workmanship, and setting would remain intact.

Other Historic Properties

Some commenters asserted that NPS omitted assessment of the proposed undertaking's effects on other NRHP-listed or eligible historic properties and their contributing features and views. Historic properties that commenters asserted the NPS omitted include the L'Enfant Plan of the City of Washington, DC; Observatory Hill Historic District; and Old Naval Observatory NHL.

NPS Response: NPS has revised the Assessment of Effects to address L'Enfant Plan of the City of Washington, DC; Observatory Hill Historic District; and Old Naval Observatory NHL.

Views and Viewsheds - Generally

Adverse Effects

Some commenters asserted that the project would alter the skyline and diminish nationally significant symbolic relationships, including the visual expression of unity represented by uninterrupted cross Potomac sightlines.

Some commenters asserted that any nighttime obstruction lighting that may be required to ensure aviation safety would further affect views within and around the National Mall and the Arlington corridor.

NPS Response: The Triumphal Arch would alter the skyline and cross-Potomac sightlines and add a new element that celebrates America's independence. The nation's capital continues to evolve as Americans seek new ways to tell their story. The Triumphal Arch would be a new addition to an ever-changing landscape.

The obstruction lighting on the Arch will be installed per FAA regulations for aviation safety. The lighting may change the overall nighttime views, but many other structures in the area have obstruction lighting for aviation safety and the obstruction lighting on the Arch is not anticipated to be any more significant than other lighting in the area.

Beneficial Effects

Some commenters asserted that a celebratory arch might enhance arrival or departure experiences and a sense of commemoration to the viewshed.

NPS Response: Similar to other monuments and memorials within the National Mall, the Triumphal Arch will be a visible landmark from the sky and will be at a location in Memorial Circle that is considered the entrance to Washington.

Proposed Alternatives or Mitigations Related to Views and Viewsheds

Some commenters asserted that smaller or low-profile designs, alternative locations, or preserving existing viewsheds should be considered to avoid permanent visual obstruction.

NPS Response: Smaller-scale alternatives of the Triumphal Arch were considered but not chosen because smaller arches would block more of the view as the arch itself would not be large enough to see through and frame the Lincoln Memorial or Arlington House. The proposed height of the Arch is an effort to frame historic locations from specific viewpoints. In addition, the location of Memorial Circle was chosen specifically as a significant ceremonial gateway and to complement the axial views along the Memorial Avenue Corridor.

Cultural Landscapes - Generally

Adverse Effects

Some commenters asserted that the proposed arch was incompatible with the character of nationally significant cultural landscapes, conflicting with their commemorative purpose, the principles of the McMillan Plan, and the NPS's stewardship responsibilities.

Some commenters asserted that the project would permanently alter major cultural landscapes, including the Potomac Basin and the Memorial Avenue Corridor, by disrupting designed views, spatial relationships, and the historic landscape composition. Some commenters asserted that no form of mitigation could restore a blocked view or replace the cultural landscape associations that would be lost if the arch were constructed.

Commenters cited the *Secretary of the Interior's Standards for the Treatment of Cultural Landscapes (Spatial Organization & Land Patterns)*, which they asserted recommends that landscapes should "retain and preserve existing spatial organization."

Some commenters asserted that the arch would result in a loss of symbolic unity, spatial organization, and architectural coherence across all the landscapes in the area, fundamentally changing how the cultural landscapes are experienced.

Some commenters were concerned about the cumulative effects on the broader monumental landscape, including lighting, utilities, and security features.

NPS Response: The NPS acknowledges that the proposed Arch would change the cultural landscapes of the area and add a new element that celebrates America's independence. The nation's capital continues to evolve as Americans seek new ways to tell their story. The Triumphal Arch would be a new addition to an ever-changing landscape.

The lighting proposed for Memorial Circle and the Arch is consistent with the established lighting character of nearby monuments and commemorative features, and incorporates FAA-required lighting, ensuring overall compatibility with the broader ceremonial landscape.

Proposed Alternatives or Mitigations Related to Cultural Landscapes

Some commenters asserted that context sensitive commemorations or landscape focused designs, such as ecological restoration or small-scale improvements, would better align with the character of the existing cultural landscapes.

Some commenters asserted that improving public transit or making circulation related upgrades would address visitor needs while avoiding further disruption to the cultural landscape.

Commenters suggest that proposals be considered to enhance and interpret the existing landscape rather than introduce a new, dominating structure.

NPS Response: The proposed Triumphal Arch and associated improvements would enhance opportunities for meaningful engagement with the historic landscapes connecting Washington, D.C. and Arlington. The improvements to traffic and circulation under the proposed undertaking would benefit the American people by enhancing circulation, safety, and the overall ease of travel through this prominent gateway, specifically pedestrians and cyclists traveling between the National Mall and Arlington National Cemetery. The transportation and circulation improvements included in the selected actions will be constructed as part of the Arch project. Some of these improvements also have independent utility, and related improvements are being advanced through separate projects listed in Appendix F of the Revised EA. Although some historic views would be adversely affected, the proposed action would not reduce educational opportunities or significantly adversely impact public understanding of the surrounding park areas and cultural landscapes. Rather, the Triumphal Arch would provide new opportunities for interpretation, orientation, and reflection within a nationally significant setting. Over time, the Arch would directly benefit the American people by creating a new public space for viewing, learning, and appreciating the historic Potomac River corridor and its monumental alignments.

Archaeology

Some commenters recommended conducting archaeological studies where relevant.

NPS Response: NPS conducted appropriate archaeological investigations to evaluate the potential for impacts from the proposed action. These studies concluded that no intact archaeological sites are present within the anticipated construction area and that no additional archaeological investigations are warranted.

VISITOR EXPERIENCE, ACCESS, AND SAFETY CONCERNS

Visitor Experience

Adverse Effects

Some commenters asserted that the structure would compete with or overshadow existing memorials, shifting focus away from established sites and reorganizing the visitor experience around the arch rather than the broader national story.

Some commenters asserted that the project would commercialize or trivialize sacred or historically significant spaces, creating confusion of meaning and diminishing the intent of reflective areas; disrupt access, obstruct views, increase congestion, and negatively affect visitor enjoyment; and increase the risk of vandalism, posing potential threats to surrounding memorials and diminishing the solemn and respectful nature of the area

Some commenters asserted that inadequate parking, limited safe access, and increased traffic and noise would degrade the visitor experience.

One commenter stated that the area near the Arlington National Cemetery entrance and the adjacent Metro station is a popular location for viewing flyovers, and that constructing the Arch would largely eliminate this longstanding public use.

NPS Response: The Triumphal Arch would provide new opportunities for interpretation, orientation, and reflection within a nationally significant setting. Although some historic views would be adversely affected, the proposed action would not reduce educational opportunities or significantly adversely impact public understanding of the surrounding park areas and cultural landscapes.

The improvements to traffic and circulation under the proposed action would benefit the American people by enhancing circulation, safety, and the overall ease of travel through this prominent gateway, specifically pedestrians and cyclists traveling between the National Mall and Arlington National Cemetery.

Memorial Circle is not currently used by the public as a viewing location for flyovers. The FAA completed a limited aeronautical review and concluded that the proposed project would have no significant adverse effect on airspace or on visual or instrument procedures at Ronald Reagan Washington National Airport and would not have any effect on airport facilities or radio/visual navigational and landing aids. The FAA review determined that the project would require obstruction lights, which have been incorporated into the project description. NPS will implement any required mitigation measures and will address additional FAA compliance steps as the project progresses through subsequent design phases, to ensure the continued safety of the airspace.

Beneficial Effects

Some commenters asserted that the arch could attract additional visitors, provide new views, or serve as a tourism landmark and an appealing destination.

NPS Response: The Arch is expected to attract visitors to the area and provide new viewing opportunities at the viewing platform of the surrounding areas. It is expected to be an appealing destination and would be incorporated into tours of the nation’s capital.

Proposed Alternatives or Mitigations Related to Visitor Experience

Some commenters recommended enhancing the visitor experience by improving existing facilities, such as bathrooms, water access, shelter, gardens, and site maintenance; improving interpretation and accessibility; and preserving existing memorials, including maintaining open views and historic spatial relationships, rather than constructing a new monumental structure.

Some commenters recommended creating contemplative or accessible gathering areas away from traffic and focusing project investments on improving current visitor infrastructure and programming.

NPS Response: The purpose and need for the Arch is to celebrate 250 years of American independence by honoring the principles of American independence. Maintaining and improving existing facilities, by themselves, do not meet the goals of the undertaking.

Traffic and Circulation

Adverse Effects

Some commenters asserted that construction would cause substantial and prolonged traffic disruptions, including multiyear lane reductions, detours, restricted turning movements, and associated safety hazards for drivers, pedestrians, and cyclists. Commenters described Memorial Circle as already one of the most important choke points between Arlington Cemetery, the Pentagon, Ronald Reagan Washington National Airport, Arlington Memorial Bridge, I-395/Route 27, Route 50, and Washington, D.C. Commenters asserted that these potential effects have not been adequately analyzed, particularly noting that existing traffic studies were insufficient to evaluate circulation, safety, and long term effects.

Some commenters asserted that the introduction of traffic signals at Memorial Circle would fundamentally alter and undermine the operational purpose of the existing rotary, which is designed to maintain continuous vehicular flow. Signalization, whether fully timed or activated solely to accommodate pedestrian crossings, would interrupt current circulation patterns and is unlikely to sustain the levels of traffic the rotary presently supports. Some commenters specifically raised concerns regarding impacts around traffic associated with funerals and other ceremonies at Arlington National Cemetery.

Some commenters asserted that the project would exacerbate pedestrian and vehicle safety hazards. Some commenters also asserted that the arch could create safety risks for drivers because its size and placement would limit sightlines, and the required lighting could further distract motorists.

Some commenters highlighted adverse impacts to major events (e.g., the Cherry Blossom 10 Mile Run, Marine Corps Marathon) from increased congestion.

NPS Response: The traffic analysis demonstrates that the proposed transportation improvements address documented, existing pedestrian, bicycle, and operational challenges at Arlington Memorial Circle while improving safety and circulation for all users. Existing conditions include indirect pedestrian and bicycle routes that can encourage unsafe crossings, uncontrolled crosswalks that rely on driver yielding, and unconventional roadway geometry that can be confusing to motorists. Existing pedestrian and bicyclist volumes independently satisfy the Manual on Uniform Traffic Control Devices (MUTCD) standards for a fully signalized crosswalk, providing a clear industry-standard basis for installing protected signalized crossings at Memorial Circle to replace the existing rectangular rapid flashing beacons. The proposed eight protected crossings would create more direct and intuitive connections between Arlington

Memorial Bridge and the Mount Vernon Trail, eliminate conflicting pedestrian and vehicle movements, and simplify vehicle operations while maintaining applicable MUTCD requirements.

The improvements are designed to enhance transportation system reliability and meet industry standards for stopping sight distance. The District of Columbia has signalized many traffic circles owned and operated by the NPS to improve operations and safety. Using the 7th Edition Highway Capacity Manual methodology, the U.S. DOT Volpe Center study (Volpe 2026) found that recurring congestion is primarily associated with the existing Washington Boulevard/GWMP ramp merge south of the Circle, rather than operations within the Circle itself. The proposed signal queues are expected to remain well upstream of that existing bottleneck, while the project would simplify traffic movements and redistribute some traffic toward intersections with available capacity. The study therefore indicates that the improvements can enhance safety and pedestrian circulation while maintaining effective vehicle operations through Arlington Memorial Circle.

The project is not expected to adversely affect Arlington Cemetery funeral processions, which are staged to the west on Memorial Avenue. For major events, including nationally significant funeral processions, presidential motorcades, the Cherry Blossom 10 Mile Run, and Marine Corps Marathon, Arlington Memorial Bridge and Memorial Circle are closed to general vehicle traffic. This project will not impact those events.

Beneficial Effects

Some commenters asserted that the project could improve pedestrian safety.

Commenters expressed support for planned transportation improvements (e.g., safer crossings, wider trails).

NPS Response: It is expected that improvements to circulation and safety at Memorial Circle, including signalized crosswalks, reduced conflict points among travel modes, and upgraded pedestrian and bicycle facilities, would provide long-term safety benefits.

Proposed Alternatives or Mitigations Related to Traffic and Circulation

Some commenters suggested that the agency should consider alternative access plans, different project locations, or improvements to existing transportation infrastructure.

Some commenters suggested pursuing the transportation upgrades independent of the Arch project, including suggestions to pedestrianize parts of Memorial Circle or improve bike infrastructure.

NPS Response: The Department considered a no-action alternative, alternative locations, and changes in the scale and design of the Arch. The Department determined that alternative locations would not retain the undertaking's relationship to the historic planning and ceremonial context of Memorial Circle, and that smaller designs would result in greater obstruction of historic views. Likewise, improvements to existing transportation infrastructure, by themselves, do not meet the goals of the undertaking.

All elements of the transportation network refinements create safety and operational improvements consistent with engineering guidelines. Most of the improvements were evaluated and approved in prior planning efforts and will advance as funding becomes available. See Appendix F of the Revised EA for a list of previously approved projects.

Health and Safety

Adverse Effects

Some commenters asserted that emergency access, emergency vehicular staging, emergency response flights and evacuation routes may be compromised by the proposed project, during both the construction and post-construction phases.

NPS Response: Emergency access and response are not expected to be impacted during or after construction. Similar to other large construction projects in the area, emergency responders anticipate and plan for various scenarios and consider altered plans during construction activities. Emergency vehicle staging would be accommodated around Memorial Circle, especially after construction where shoulders are widened. Although Memorial Circle is used intermittently (approximately five times per year) for U.S. Park Police medical evacuation (medevac) operations, the nearby areas that can safely accommodate helicopter landings when operational needs require. While Memorial Circle offers a convenient location, the availability of these alternative sites ensures that emergency response functions would continue without meaningful disruption. As a result, removing the Circle from medevac use would not result in significant changes to public safety or diminish overall emergency response capability.

Aviation Safety

Adverse Effects

Some commenters asserted that the arch's height poses significant airspace risks, may require the installation of aviation warning lights, and could conflict with applicable FAA regulations. Some commenters asserted that the height of the proposed arch could interfere with flight paths serving Ronald Reagan Washington National Airport. Some commenters asserted that the project could endanger pilots, passengers, and bystanders by introducing new airspace hazards in an area with a history of aviation incidents.

One commenter asserted that military helicopters frequently fly to and from the Pentagon and other locations along the river at low altitudes and the project could significantly adversely affect the safety of these flights.

Some commenters asserted that construction cranes used for the project may exceed permitted height limits and pose additional aviation safety risks during construction.

NPS Response: NPS does not possess specialized expertise in aviation safety and therefore relies on the expertise of the Federal Aviation Administration (FAA). The FAA completed a feasibility study and concluded that the proposed project would have no significant adverse effect on airspace or on visual or instrument procedures at Ronald Reagan Washington National Airport and would not have any effect on airport facilities or radio/visual navigational and landing aids (Federal Aviation Administration, 2026a). FAA subsequently completed an aeronautical study for the Arch and concluded, "the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities," and that the Arch would not be a hazard to air navigation (Federal Aviation Administration, 2026). The FAA feasibility study and aeronautical study determined that the Arch would require an obstruction light. The FAA approved a natural-gas-powered flame on the torch atop the Arch's tallest statuary. The "eternal flame" will serve as the Arch's required obstruction light (Federal Aviation Administration, 2026). The NPS will implement any required mitigation measures and will address additional FAA compliance steps as the project progresses through subsequent design and implementation phases.

Proposed Alternatives or Mitigations Related to Aviation Safety

Some commenters recommended reducing the height of the structure or relocating it outside of active flight paths.

Some commenters asserted that full engineering, environmental, safety, and FAA studies are required to properly evaluate the project and ensure that redesigns avoid conflicts with established flight paths.

NPS Response: Smaller-scale alternatives of the Triumphal Arch were considered but not chosen because smaller arches would block more of the view as the arch itself would not be large enough to see through and frame the Lincoln Memorial or Arlington House. The proposed height of the Arch reflects an effort to frame historic locations from specific viewpoints. In addition, the location of Memorial Circle was chosen specifically as a significant ceremonial gateway and to complement the axial views along the Memorial Avenue Corridor. The FAA completed an aeronautical study and concluded that the proposed project would have no substantial adverse effect on airspace or on visual or instrument procedures at Ronald Reagan Washington National Airport and would not have any effect on airport facilities or radio/visual navigational and

landing aids. NPS will implement any required mitigation measures and will address additional FAA compliance steps as the project progresses through subsequent design phases.

PROJECT DESIGN AND LOCATION

Arch Design and Scale

Adverse Effects

Some commenters asserted that the proposed arch's design and scale are incompatible with the surrounding monumental and historic landscape, describing it as too large, grotesque, oversized, tacky, garish, authoritarian, and stylistically at odds with the character of the civic setting; they emphasized that its massing, ornamentation, and visual intrusion would introduce a distracting and inappropriate element into the landscape.

Some commenters asserted that ornamental features such as inscriptions, gilding, and statues are inappropriate for the setting and inconsistent with national memorial design traditions.

Some commenters asserted that the arch's height would violate the 1910 Height of Buildings Act and visually dwarf the Lincoln Memorial and nearby monuments**.**

Some commenters asserted that the use of reinforced concrete with granite veneer rather than solid stone construction raises concerns about long term durability, future maintenance costs, and whether the design would meet the quality standards associated with other major monuments in Washington.

Some commenters asserted that the arch was not consistent with previous plans, noting that while the 1924 Arlington Memorial Bridge Commission report contemplated two freestanding monumental columns on Columbia Island, those elements were fundamentally different from the current proposal. The commenter noted that the historic columns were not designed as a triumphal arch, did not span the primary axis, did not include any occupied interior space, preserved open space between them, and reflected the landscape design traditions of the period.

NPS Response: The nation's capital continues to evolve as Americans seek new ways to tell their story. The Triumphal Arch would be a new addition to an ever-changing landscape with its own architectural style and embellishments. The construction of the Arch would be structurally sound with long-term durability and readily maintained.

The placement of the Triumphal Arch at Memorial Circle is supported by the site's design history and its unrealized monumental intent. Early 20th-century plans for Columbia Island, now Memorial Circle, envisioned a grand, symbolically charged landscape that reinforced the ceremonial alignment between Arlington Memorial Bridge and Arlington National Cemetery. Over several decades, the Commission of Fine Arts reviewed concepts including a large elliptical plaza framed by formal cross-axes, monumental pavilions, and prominently, two columns

representing national reunion. The Triumphal Arch would continue this historic lineage by introducing a focal point that reflects the site's intended character and celebrates 250 years of American independence.

Beneficial Effects

Some commenters admired the grand scale or classical styling of the arch.

Some commenters described the arch's design as visually impressive or beautiful, describing it as majestic, magnificent, well suited to the nation's 250th anniversary, dignified, or fitting for a national commemoration.

NPS Response: The Arch is intended to celebrate 250 years of American independence by honoring the principles of American independence and is scaled and designed for such a purpose.

Proposed Alternatives or Mitigations Related to Arch Design and Scale

Some commenters asserted that the arch should be redesigned without gold accents, or reenvisioned using American-rooted or modern design approaches. A commenter suggested using American Bison for statuary feature.

Some commenters asserted that a return to the original two column concept or the development of a uniquely American design, rather than one perceived as derivative, should be explored.

Some commenters asserted that alternative commemorations of a smaller scale should be considered, including significantly reduced height structures, small scale features, redesigned commemorative elements, or options limited to gardens, trellises, plaques, benches, walls, fountains, time capsules, or other modest treatments.

Some commenters asserted that commemorations should reflect American values, unity, democracy, and the nation's shared ideals, including concepts such as "E Pluribus Unum." They recommended celebrating national milestones through investments in parks, infrastructure, or public services rather than constructing new monumental structures, and urged that commemorative efforts honor the American people collectively rather than individual figures.

Commenters proposed the following instead of a Triumphal Arch: a 250th anniversary museum, amenity improvements to Lady Bird Johnson Park, additional educational programs.

Some commenters proposed choosing the final design in a distinctly American manner, such as holding a public design competition. Others suggested that the final design should be selected by veterans' organizations.

One commenter submitted a detailed alternative design ("Independence Arch") that aims to preserve sightlines and offer a more American civic monument.

Commenters noted that the project to celebrate the 250th should reflect "shared values," "democratic ideals," or "collective achievement."

NPS Response: The Arch's proposed size and statuary are intended to celebrate America's independence through a grand and ornate design. The Arch complements the idea of the McMillan Plan and other planning documents that a structure or structures be placed in Memorial Circle. The plans were not prescriptive and provided an opportunity for the Arch to be sited within the circle at the size and scale that is proposed.

Investments in other park infrastructure and public service opportunities, by themselves, do not meet the goals of the undertaking.

Arch Location – Generally

Some commenters asserted that alternative locations should be considered. Some commenters provided potential locations including: sites in Northeast and Southeast Washington, D.C., including Buzzard Point, Congressional Cemetery, and the RFK Stadium area; in Prince George's County, Maryland; over a tunnel connecting to Arlington Boulevard; or at Mar-a-Lago in Florida. Other proposed locations: South Capitol Street, Chevy Chase Circle; near stadiums or Route 1; Commodore Joshua Barney Circle; and near Nationals Park.

Some commenters were concerned about the safety of the project because of unstable ground conditions and potential structural failure.

NPS Response: The Department considered a no-action alternative, alternative locations, and changes in the scale and design of the Arch. The Department determined that alternative locations would not retain the undertaking's relationship to the historic planning and ceremonial context of Memorial Circle, and that smaller designs would result in greater obstruction of historic views.

A geotechnical survey has been completed. The results will guide the Arch's design and foundation plans to ensure it is properly supported. The survey found no issues with the existing ground conditions or with the site's ability to support the Arch.

ENVIRONMENTAL CONCERNS

Lady Bird Johnson Park

Adverse Effects

Some commenters asserted that the proposed arch would disrupt the natural environment of Lady Bird Johnson Park, including impacts to wetlands, wildlife, habitat areas, and the park's mature tree canopy; worsen stormwater problems in Lady Bird Johnson Park, increase impervious

surfaces, and contribute to long term- ecological degradation; and threaten the natural beauty of the Park within this scenic and environmentally sensitive landscape.

NPS Response: The proposed undertaking is not expected to impact wetlands, wildlife, habitat or trees as the project will be confined to Memorial Circle and utility corridors that would include road shoulders. Any impacts to vegetation during construction related to utility installation would be replaced in-kind.

With the addition of impermeable materials within Memorial Circle, the project would incorporate perimeter bioretention facilities within the landscaped zones around the monument and within the traffic circle. These features would capture and treat runoff stormwater, reduce reliance on underground structures, and be designed with appropriate pretreatment, overflow, and underdrain components to meet standards developed in compliance with District stormwater management regulations.

Proposed Alternatives or Mitigations Related to Lady Bird Johnson Park

Some commenters asserted that Lady Bird Johnson Park should be restored and maintained rather than altered by the construction of a large new monument.

NPS Response: Routine maintenance activities at Lady Bird Johnson Park by themselves, do not meet the goals of the undertaking and would continue regardless of the construction of the proposed Arch.

Water Quality

Adverse Effects

Some commenters asserted that the project would worsen stormwater runoff due to increased impervious surfaces, resulting in potential degradation of water quality and adverse effects on the Potomac River ecosystem and adjacent natural areas, creating long term ecological and hydrological impacts.

NPS Response: With the addition of impermeable materials within Memorial Circle, the project would incorporate perimeter bioretention facilities within the landscaped zones around the Arch and within the traffic circle. These features would capture and treat runoff stormwater, reduce reliance on underground structures, and be designed with appropriate pretreatment, overflow, and underdrain components to meet standards developed in compliance with District stormwater management regulations. As such, impacts on water quality are not anticipated.

Proposed Alternatives or Mitigations Related to Water Quality

Some commenters recommended implementing stormwater management controls, habitat restoration, and other mitigation measures to protect water quality and ecological resources.

NPS Response: Stormwater management controls and mitigations would be implemented during the construction of the project and the addition of bioretention facilities within Memorial Circle would ensure long-term protection of water quality. Any impacts to habitats during construction would be mitigated by in-kind replacement for the protection of ecological resources.

Air Quality

Adverse Effects

Some commenters asserted that the project raises air quality concerns and could intensify environmental health risks in an area already experiencing congestion-related impacts.

NPS Response: Construction activities associated with the proposed project would result in temporary air emissions from construction-related emission sources. These emissions would be temporary in nature and air quality conditions would return to normal levels prior to construction once construction is complete. No lasting degradation of ambient air quality would occur.

Environmental – General

Adverse Effects

Some commenters asserted that the project would result in loss of green space, tree removal, and long-term landscape disruption, diminishing the natural character of nearby parklands; harm wildlife through habitat loss, ecosystem disruption, and potential impacts on bird migration; increase light pollution, noise, and other forms of environmental degradation; and worsen stormwater issues, soil impacts, and cumulative environmental effects.

NPS Response: The proposed undertaking is not expected to result in significant loss of green space as the proposed undertaking does not include tree or vegetation removal, apart from replacement of the artificially maintained lawn surface within Memorial Circle. Therefore, there are no anticipated impacts to wildlife or their habitat. Any vegetation disturbed during utility installation would be replaced with similar plantings.

The Arch's exterior lighting would follow the established lighting character of the National Mall and other nearby areas. Although additional lighting is required to meet aviation safety standards due to the site's proximity to Ronald Reagan Washington National Airport, the project area already has substantial ambient urban lighting, and the incorporated design measures further limit light emissions. As a result, the project is not expected to meaningfully contribute to night-sky degradation.

Stormwater management controls and mitigations would be implemented during the construction of the project and the addition of bioretention facilities within Memorial Circle would ensure long-term protection of water quality.

Minimal impacts to soils are expected. Standard mitigation measures, like erosion control barriers, will be used during construction.

Proposed Alternatives or Mitigations Related to Environmental Issues-General

Some commenters recommended prioritizing conservation, ecological restoration, and long-term stewardship of natural resources rather than constructing new features.

Some commenters recommended directing funds toward the restoration of existing parklands, removal of invasive species, and enhancement of native habitat.

NPS Response: The purpose of the proposed undertaking is to celebrate 250 years of American independence by honoring America's founding principles through installation of an Arch in Memorial Circle. The suggested conservation measures and continued maintenance of parklands by themselves, do not meet the goals of the undertaking.

DECISION MAKING PROCESS & PUBLIC INPUT

Public Review and Input

Some commenters asserted that the decision-making process is rushed, lacks transparency, and bypasses established review procedures; and that public engagement has been insufficient, citing short comment periods, inadequate consultation, limited outreach, and a perception that outcomes were predetermined.

Commenters asserted that organizations were denied consulting party status, contrary to past practice, undermining expert input.

Some commenters expressed concern that the project was being advanced before it was sufficiently developed to allow for meaningful public evaluation. They noted that the draft Programmatic Agreement acknowledges that key design details are not yet developed and that effects would need to be assessed in future reviews. Commenters also pointed out that the draft PA contains unresolved placeholders which they viewed as evidence that the review record is not yet mature.

NPS Response: The NPS acknowledges the comments regarding the consultation process with other agencies. The NPS has continued to consult with agencies following the close of the public comment period. The NPS solicited public comments twice through publication of an Assessment of Effects which included sufficient detail regarding the project for public comment and received extensive public engagement. The revised Final Assessment of Effects dated August 28, 2026, included changes and additions in response to public comments. Additionally, continued coordination with the Commission of Fine Arts (CFA) and the National Capital Planning Commission (NCPC) will provide more opportunities for public engagement.

Beneficial Effects

Commenters appreciated the opportunity to provide public input noting appreciation for the reopening of the public comment period.

NPS Response: The NPS acknowledges commenters' appreciation for the opportunity to provide input and for the reopening of the public comment period.

Proposed Alternatives or Mitigations Related to Public Review and Input

Some commenters recommended a full, transparent process, including an evaluation of a no-build alternative, extended public comment periods, and full publication of NEPA and Section 106 documentation.

Some commenters recommended offering greater public involvement through a national design competition, public referendum, or broader stakeholder consultation.

Some commenters recommended procedural improvements such as protecting personal data upon request and finalizing design details before developing any Memorandum of Agreement.

Commenters asserted construction should be delayed for further public and professional input and competitive design selection.

NPS Response: The NPS is following all required compliance procedures, including Director's Order 28 and the Advisory Council on Historic Preservation's Section 106 regulations at 36 CFR Part 800. The analysis also complies with the Department of the Interior's NEPA implementing procedures in 516 DM 1, the 2026 DOI NEPA Handbook, and the NEPA regulations at 43 CFR Part 46.

SOCIOECONOMICS, OPERATIONS

Socioeconomics

Some commenters requested NPS complete a cost benefit analysis before proceeding with the process. Others were concerned that the cost was too great compared to the economic benefits and others asserted private funds should be used rather than Federal funds.

NPS Response: The NPS acknowledges the suggestions for considering costs and economic benefits resulting from the proposed undertaking. The proposed Arch would create a new visitor experience along the corridor of national remembrance that includes an exhibit space, café, gift shop, and an elevated viewing platform. Visitation projections indicate that peak season daily visitation could range from approximately 2,000 visitors under a low scenario to more than 22,000 visitors under a high scenario (Volpe, 2026). Visitors to Washington, D.C. typically visit numerous museums, monuments, and cultural institutions during their trip. Thus, it is anticipated that a new visitor opportunity would contribute to the collective positive economic benefits

generated by visitor attractions in Washington, DC, but would not constitute a major economic driver for the region.

A cost benefit analysis and identification of funding for the Arch is outside the analysis of the project under Section 106 of the NHPA.

National Park Service Operations

Some commenters asserted that the arch would divert funds away from park maintenance, staffing, and essential operations, creating additional operational strain and liabilities.

NPS Response: The NPS acknowledges the concerns related to maintenance of the Arch and its relationship to other park sites in the area. Ongoing operational needs and programming at other park facilities by themselves, do not meet the goals of the undertaking.

REFERENCE:

Federal Aviation Administration (FAA). (2026). *Determination of no hazard to air navigation: 2026-AEA-8628-OE* [Report]. Obstruction Evaluation Group. Available at: https://oeaaa.faa.gov

Federal Aviation Administration (FAA). (2026a). *Feasibility Study: ASN: 2026-AEA-6751-OE.* [Report]. Obstruction Evaluation Group. Available at: https://oeaaa.faa.gov

U.S. Department of Transportation, Volpe National Transportation Systems Center (Volpe). (2026). *Pedestrian Circulation Improvements and Signalization Concept Plan at Arlington Memorial Circle* [Report]. Prepared for National Park Service (NPS), National Capital Region (NCR).

APPENDIX A

REVISED FINDING OF NO SIGNIFICANT IMPACT

National Park Service
US Department of the Interior

George Washington Memorial Parkway

Revised Finding of No Significant Impact

Triumphal Arch
Revised Environmental Assessment

Recommended:

FRANK LANDS Digitally signed by FRANK LANDS
Date: 2026.10.09 16:41:02 -04'00'

Frank Lands
Deputy Director, National Park Service

Approved:

JESSICA BOWRON Digitally signed by JESSICA BOWRON
Date: 2026.10.09 16:56:28 -04'00'

Jessica Bowron
Comptroller, Exercising the Delegated Authority of the Director, National Park Service

Introduction

The National Park Service (NPS) prepared an environmental assessment (EA) consistent with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.); the Department of the Interior (DOI) NEPA regulations, 43 CFR Part 46; and the 2026 DOI Handbook of NEPA Implementing Procedures (516 DM 1 Handbook). This Finding of No Significant Impact (FONSI) documents the National Park Service's determination that the proposed Triumphal Arch in Memorial Circle would not result in significant environmental impacts. However, this FONSI does not constitute a final decision or approval for the project. Typically, the NPS issues the FONSI and the associated Decision Document together; however, because certain components of the decision-making process have not yet been completed, including final review by the National Capital Planning Commission, the NPS will issue a separate Decision Document at a later date. Preparation of a stand-alone Decision Document is consistent with the DOI NEPA Handbook.

Similarly, the NPS has not yet prepared a Non-Impairment Determination for the project. Although NPS guidance recommends completing this determination concurrently with the FONSI, that recommendation presumes that the FONSI and Decision Document are issued together. In this instance, because they are not, the NPS will prepare the Non-Impairment Determination to accompany the later Decision Record. This approach ensures that the non-impairment finding is based on the full compliance record rather than solely on the NEPA analysis.

The project study area includes Memorial Circle, the adjacent staging area, the surrounding cultural landscapes, and the proposed utility corridors. Memorial Circle is a formally designed element of the George Washington Memorial Parkway, located at the west end of Arlington Memorial Bridge. The Parkway, a 25-mile corridor along the Potomac River, combines early 20th century landscape design, transportation infrastructure, natural and cultural resources, and recreational access. Memorial Circle lies within Lady Bird Johnson Park, whose landscaped grounds, native trees, multi-use trails, and cultural features provide the broader setting that frames the Circle within the Parkway corridor.

Purpose and Need for Action

The purpose of the proposed action is to celebrate 250 years of American independence by honoring America's founding principles through installation of an arch at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage.

Arlington Memorial Bridge and Memorial Avenue serve as a ceremonial entrance to Washington, D.C. and the gateway to Arlington National Cemetery, physically and symbolically uniting the nation's history along a corridor already lined with monuments honoring diverse figures of American significance. Executive Order 14252, *Making the District of Columbia Safe and Beautiful*, directs the Secretary of the Interior to develop proposals to ensure Federal buildings and lands uplift and beautify public spaces and generate in the citizenry pride in and respect for our Nation, promoting beautification and the preservation of our history and heritage. Installation of an appropriate structure presents an opportunity to advance that directive within one of the most symbolically significant corridors in the Capital.

Proposed Action

The Arch would be an approximately 250-foot-tall reinforced concrete structure clad in granite or marble veneer and ornamented by a central winged figure and two statues, positioned above each Arch leg. Dimensions would be finalized during future design efforts. The following dimensions are current approximations. The principal architectural component would rise approximately 166 feet above finish grade, with surmounting statuary extending the total height to approximately 250 feet. The main footprint of the structure would be approximately 108 feet by 184 feet, with a 16,380-square-foot footprint at ground level. The maximum lateral projection at the upper cornice would extend to 107 feet 4 inches by 183 feet 4 inches. The structure would contain approximately 66,524 gross square feet distributed across four levels. The observation deck would provide approximately 9,560 square feet of exterior deck area. The Arch would serve as a monumental architectural feature aligned with the axis between Memorial Avenue and the Arlington Memorial Bridge. The main body of the Arch would be 166 feet wide with a 55-foot-wide opening, providing views through the Arch to the Lincoln Memorial, Memorial Bridge, the Women's Military Memorial, and the Arlington House.

- Ground Floor Level: The ground level would contain security screening, back-of-house functions, and vertical circulation lobbies.
- Gallery/ Mezzanine Level: The gallery/mezzanine level would also contain exhibit space, back-of-house areas, restrooms, and vertical circulation lobbies, with the possibility of including a café and gift shop.
- Mechanical Level: The mechanical level would contain mechanical and support spaces.
- Observation Deck Level: The observation deck level would include the vertical circulation lobby and exterior deck.

The structure would be built from concrete and finished with a granite or marble veneer. The granite or marble veneer for the Arch would be sourced from a single quarry located in Vermont, California, or Italy selected according to availability, overall cost, and the desired color and ultimately delivered by truck to Memorial Circle.

The structure would include six stairways and five elevators. Two pairs of elevators in the north and south legs would serve the ground and gallery levels, and a fifth elevator would serve the observation deck. Two large circular spiral stairs would connect the ground level to the gallery level; two elliptical spiral stairs would connect the gallery level to the observation deck; and two egress stairs would connect all levels to dedicated exit-only doors at grade.

The proposed action would also include site development within and immediately around Memorial Circle. A paved public plaza would surround the Arch inside the traffic circle. The plaza would be protected by a barricade seat wall generally located at the existing inner curb and by removable or retractable bollards at authorized vehicle access points. Exterior lighting would be installed to illuminate the Arch and plaza, and the proposed action would include minimal exterior signage, perimeter and rooftop security cameras, access-control systems for major doors and nonpublic areas, interior and exterior video surveillance, and a security screening area with walk-through magnetometers, x-ray equipment, and explosive trace detection equipment.

Vehicle access to the plaza would be restricted to authorized maintenance, contractor, law enforcement, and emergency vehicles.

Memorial Circle would be illuminated by six approximately 30-foot light poles, each equipped with eight fully shielded, low-spill luminaires. Linear lighting installed along the underside of the Arch's vault would provide illumination of the Arch walls. Sixteen luminaries on the roof deck would light the statues. The winged liberty statue would hold a sculptural torch containing a natural-gas-fueled eternal flame, which would remain continuously lit and serve as the FAA-required obstruction light for aviation safety.

Proposed Changes to Vehicle, Pedestrian, and Bicycle Use

During construction, temporary closures would be implemented. Those include:

- Westbound traffic from Arlington Memorial Bridge would be reduced to two lanes.
- Eastbound traffic from Memorial Avenue will not be able to turn northbound on Arlington Boulevard (U.S. Highway 50) and will be directed onto Arlington Memorial Bridge.
- Northbound traffic from Washington Boulevard (State Route 27) would not be permitted into the circle, but would need to turn right onto Arlington Memorial Bridge.
- The sidewalk on the south side of the Circle would be temporarily rerouted to the north side.

Additional short-term closures and detours would be required at the beginning of the project to establish the maintenance of traffic configuration, during construction to accommodate utility installations, and again near the end of construction to complete final transportation-related elements.

Under the proposed action, new traffic signals would be installed to control vehicle movements within and around Memorial Circle. The signalization plan would activate pedestrian crossing phases through passive or active detection to ensure safe and efficient circulation for all users. These upgrades would replace existing yield and merge conditions with full signal control. The signalization of the eastern approaches to Memorial Circle, the addition of a new crosswalk across Arlington Memorial Bridge, and the realignment of existing crosswalks and conversion of RRFBs to fully signalized pedestrian crossings have independent utility as a separate transportation and safety project that improves pedestrian access to Memorial Circle. These improvements are included in the proposed action because they will also enhance access and safety for visitors to the Triumphal Arch.

Signalization-related changes include the following:

- Full signalization of Memorial Circle and all pedestrian crossings
- Three signal groups at Washington Boulevard, Arlington Boulevard, and Memorial Avenue
- Eight new fully signalized pedestrian crossings with access to the center of the Circle
- Elimination of all existing yield and merge movements
- Pedestrian actuation and detection for walk phases that activate only when needed
- Dedicated signal phases for high-volume turning movements to minimize conflicts

The proposed action would also include implementation of a series of physical modifications within and around Memorial Circle. These improvements would reshape roadway geometry, expand pedestrian space, and incorporate new materials and features that calm traffic and create safer conditions for people walking. Construction activities would include enlarging key median islands, possibly converting existing pavement treatments to more durable and pedestrian

friendly materials, and adjusting the circulating roadway to reduce speeds and better accommodate all users. Physical construction–related changes include:

- Enlarged median islands on the east and west sides of Memorial Circle
- Circulating roadway narrowed to approximately 20 feet
- Conversion of the pavement marked truck apron to a mountable concrete truck apron
- Replacement of existing Belgian block along the outer edge of the Circle with grass
- Construction phase changes, including closure of the south half of the Circle, detouring two-way traffic to the north side, elimination of certain left-turn movements, and temporary pedestrian routing with a new temporary crosswalk that is designed in compliance with the Americans with Disabilities Act (ADA) and the Architectural Barriers Act (ABA) and that meets the Public Right-of-Way Accessibility Guidelines (PROWAG) incorporated into the ABA Accessibility Standards.

The proposed action would include designating a dedicated pickup and drop off area along Memorial Avenue to accommodate short-term loading and unloading and enhanced wayfinding to direct visitors toward designated safe crossings.

Construction Phasing

Construction of the Arch would occur in multiple phases over an approximately two-to-three-year period. Construction activities would generally proceed as described below.

Phase 1–Site Excavation (2–3 months). The initial phase would include site preparation, excavation within the construction footprint, and installation of temporary utilities. Temporary fencing, erosion and sediment control measures, stormwater management protocols, and staging areas would be established. Temporary pedestrian, bicycle and vehicle detours would be implemented.

Phase 2–Foundation and Support of Excavation (4–5 months). Following excavation, drill rigs would be mobilized to install the deep foundation system. Caissons would be installed to a depth of approximately 75 feet to reach bedrock. This phase would involve drilling and constructing reinforced concrete piles to support the future structure. Continuous heavy equipment operations would occur during this period.

Phase 3–Structural Concrete (10–11 months). After the foundation system is completed, crews would construct the primary structural components of the Arch. This phase would include use of tower cranes (up to 320 feet tall), forklifts, skid steers, and concrete pump systems to construct the vertical and horizontal elements of the Arch.

Phase 4–Precast Cladding (4–5 months). During this phase, the granite panels would be affixed to the Arch. Granite panels would be delivered from their source quarry and assembled on-site as the structure progresses. At the same time, work inside the structure would begin, including installing the stairs and elevators, starting the roofing system to make the building weather-tight, and beginning major mechanical, electrical, and plumbing work.

Phase 5–Statue Placement and Ceiling Installation (5–6 months). Before the facade is fully completed, a scaffold system would be built to create a working platform to install the Arch ceiling panels. To install the statue, a 300’ tall mobile crane would be required to set and

assemble the statue components. As the statue is constructed, a scaffold tower would need to be installed around it to facilitate access for connections, welding, and finishing of the statue. During these events, interior fit out would be concurrently running inside the Arch.

Phase 6–Site Hardscapes / Landscaping / Project Completion (6–7 months). At this phase, the project would be near completion. All the stone pavers and site walls would be set during this time, as well as the completion of any other landscape, hardscape, and stormwater management facilities. The interior features would be completed. The demobilization process would be underway and any construction related temporary traffic control would be removed. Permanent traffic changes, including changes to signalization, installation of crosswalks, etc. would be put in place.

Phase 7–Site Restoration and Demobilization (2 months). At the conclusion of construction, the contractor would remove temporary infrastructure, staging materials, and construction fencing. Disturbed turf and landscape areas within NPS jurisdiction would be restored to preconstruction conditions.

Staging Areas

The construction staging footprint would encompass approximately 45,000 square feet immediately south of the project site, with an additional 80,000 square feet designated for parking and to minimize vehicular traffic obstruction. The staging area would be surfaced with geotextile fabric and six inches of stone to protect underlying soils. These areas would support equipment storage, material laydown, and construction trailers. After construction is complete, these areas would be restored to their current condition and replanted. Tree removal is not anticipated at this time.

Utility Installation

To support operation of the Arch and associated facilities, new potable water, sanitary sewer, electric, gas and telecommunications utilities would be extended to the Memorial Circle area. Utilities would be extended to Memorial Circle from existing utilities using new utilities that would run south along Washington Boulevard to the north end of the Pentagon campus limits and then extend south further into the campus to access available infrastructure. All road crossings associated with the proposed action would be constructed using jack-and-bore methods, while utility crossings beneath the Boundary Channel would be installed using HDD. Where practicable, construction activities occurring within the roadway would be scheduled during non-peak commuting periods to minimize disruption to traffic operations. During peak travel periods, temporary steel plating may be installed over roadway work areas to maintain all travel lanes and sustain vehicular circulation. Installation of utilities would occur over multiple construction phases identified above.

Traffic signal infrastructure would be integrated with the existing system serving Lincoln Circle and the surrounding roadway network. To support this integration, new communication and electric connections would be extended from existing facilities in proximity to the Lincoln Memorial. These utilities would be installed either using HDD or would be placed within or attached to Arlington Memorial Bridge.

Stormwater Management Actions

Stormwater Management Actions During Construction

During construction, stormwater and erosion control practices would be implemented across the construction site to minimize sediment transport and protect adjacent drainage systems and waterways. Perimeter controls would include installing silt fence or mulch socks along all site fencing to prevent runoff from leaving the disturbed areas. Stormwater and any accumulated groundwater would be managed through a sediment treatment tank prior to discharge into the existing sewer system.

To protect inlets within and adjacent to the work zone, storm drains would be fitted with inlet protection devices. At primary site access points, a stabilized construction entrance would be established, consisting of a concrete apron paired with a 20-foot track of stone to remove sediment from vehicle tires before they enter public roadways. These measures are designed to provide effective sediment control, limit off-site impacts, and maintain compliance with applicable stormwater requirements.

Long-term Stormwater Management

Because the project would create approximately 62,875 square feet of new impervious surface, on-site stormwater retention is required under District of Columbia regulations. Preliminary estimates indicate a retention volume of about 6,300 cubic feet, with final calculations to be developed during detailed design and included in the stormwater management plan.

To meet these requirements, the project would incorporate perimeter bioretention facilities within the landscaped zones around the monument and within the traffic circle. These features would capture and treat stormwater runoff, reduce reliance on underground structures, and be designed with appropriate pretreatment, overflow, and underdrain components to meet standards developed in compliance with District of Columbia stormwater management regulations.

Groundwater and Dewatering Approach

Geotechnical investigations indicate that groundwater is located roughly 15 feet below the existing surface. As a result, only minimal dewatering would be required during construction. Water management efforts would focus on collecting shallow stormwater and surface water that accumulates in excavations. Small sump pumps would direct this water to a sediment treatment tank before it is discharged into the existing storm sewer system. Construction wastewater, expected to be minimal, would be contained and transported off-site for proper disposal, rather than discharged on-site.

Soil Excavation

The project would require the removal of approximately 1,400 truckloads of existing soils and the import of roughly 400 truckloads of engineered fill. All construction vehicles would be staged within the designated south project staging lot, with loading and unloading occurring inside the project fence to reduce congestion on adjacent roadways. Daily trucking activity is anticipated to involve between 20 and 30 trucks, transporting an estimated 80 to 100 loads per day. Excavated soils would be transported to approved private disposal facilities in Maryland or Virginia, contingent upon the results of in situ characterization and contamination testing.

Construction Equipment and Work Hours

Construction would require several tower cranes, forklifts, skid steers, drill rigs, and concrete pumping systems. Work would occur year-round with work occurring in two 10-hour shifts per day (20 hours per day) for the duration of the construction period.

Noise blankets or noise curtains would be placed around the pile hammer carriage to mitigate noise transmission.

Road Closures and Transportation Routes

The south side of Memorial Circle is anticipated to remain closed for the majority of construction and would represent the primary transportation access impact during this time. To maintain traffic operations, eastbound traffic from Memorial Avenue would be shifted to the north side of the circle.

During this configuration, certain lower-volume movements would be temporarily restricted. Eastbound traffic from Memorial Avenue would not be permitted to turn northbound onto Arlington Boulevard and would instead be directed onto Arlington Memorial Bridge. Northbound traffic from Washington Boulevard also be restricted from entering the circle and would be required to turn right onto Arlington Memorial Bridge. Westbound traffic from Arlington Memorial Bridge also be reduced to two travel lanes.

During this time, pedestrian and bicycle access would be maintained through a short detour. This detour would include one additional crossing of two travel lanes, with a rectangular rapid flashing beacon installed to improve crossing visibility and support safer pedestrian and bicycle movements through the construction area.

Additional short-term closures and detours would also be required at the beginning of the construction to establish the maintenance of traffic configuration, and again near the end of construction to complete final transportation-related elements and utility installation.

Construction deliveries and haul-off activities would primarily access the project site via I-395 using Route 27 (Washington Boulevard), which provides the most direct and operationally feasible connection to the south project staging area. As a secondary option, U.S. Route 50 (Arlington Boulevard) may be used when needed, as it offers acceptable access for construction vehicles.

Daily construction trucking would involve approximately 20–30 trucks transporting an estimated 80–100 loads per day. To limit congestion and avoid impacts to public roadways, trucks would be staged within the south project staging lot and all loading and unloading activities would occur inside the project fence line. This approach would maintain safe traffic flow and reduce conflict points between construction vehicles and the surrounding transportation network.

Proposed Visitor Access and Visitor Facilities at the Triumphal Arch

Visitor use would be managed through a timed entry system, similar to the system used at the Washington Monument, which may be administered online, on-site, or through a combination of both. Visitors would arrive at their designated entry time, enter a queue, proceed to the screening area on the first floor of the Arch, and undergo security screening before entering the public area of the Arch.

After screening, visitors would enter the public area of the Arch and proceed to the gallery level by either the stairs or the elevator. The internal circulation system would allow visitors to access the gallery, which would house all visitor service functions, including exhibit space, a café, a gift shop, and public restrooms. Visitors may experience guided time and free time within the public area of the Arch and would be expected to depart by the designated exit time to maintain capacity for entry of additional visitors.

Finding No Significant Impact

A description of the reasonably foreseeable environmental effects associated with the proposed action and with the no action alternative is included in the EA, incorporated by reference herein. The statements and conclusions reached in this FONSI are based on documentation and analysis provided in the EA and associated decision file. Consistent with the DOI NEPA Handbook, Section 1.2(b), the NPS evaluated the significance of the reasonably foreseeable environmental effects of the proposed action, identified as the proposed action in the EA, by analyzing the potentially affected environment and the degree of the effects of the proposed action. Significance is determined solely in relation to reasonably foreseeable adverse effects, considering any beneficial effects that directly offset those adverse effects to that specific resource value. The degree of effect is considered by evaluating both short-and-long term effects, both beneficial effects and adverse effects, effects on public health and safety, economic effects, and effects on the quality of life of the American People.

The EA discloses the reasonably foreseeable effects of the proposed action, including the combined effects of the proposed action with those of past, ongoing, and anticipated future actions, on the park's cultural resources, water resources, traffic and circulation, visitor experience, soundscape, and night skies. While other park resources may experience some effects, those effects are minimal and were determined not to warrant detailed analysis in the EA. Accordingly, these resources are not discussed further here, as the anticipated effects have no potential to reach a level of significance. For a detailed description of the issues and impact topics considered but dismissed, see Appendix A of the EA.

Potentially Affected Environment

A more detailed description of the potentially affected environment is included in the EA under the subheadings "Current and Expected Future Conditions of the Environment if No Action is Taken" for each resource carried forward for analysis.

The initial concepts for the Columbia Island plaza, now Memorial Circle, evolved over many years. Early plans envisioned a grand, highly symbolic landscape that integrated Arlington Memorial Bridge with a formal traffic ellipse on Columbia Island. The earliest designs proposed that the bridge roadway would meet at a large elliptical plaza from which crossarms extended north and south. Westward, the bridge axis would continue toward Arlington National Cemetery as a formal, hedge lined grand avenue culminating in pylons, gates, and a hemicycle, reinforcing the ceremonial approach. A focal point of the ellipse was to be two monumental 166-foot columns, each topped with a winged figure (representing the North and South) to symbolize national reunion after the Civil War. The ellipse would be framed by a granite balustrade, joining the pylons located at the bridge ends. At the termini of the north and south crossarms, small circular Greek temples were planned, each positioned within a circular roadway that connected to major regional routes, Lee Highway to the north and Mount Vernon Memorial Highway to the

south. The column concept was ultimately abandoned in December 1931. Design revisions eliminated the proposed cross axis, reducing the scheme to a single traffic circle. Kendall's 1932–1933 submissions replaced the earlier monumental columns with two basin framed pavilions housing 18-foot gilded bronze figures of Liberty and Unity, retaining an emphasis on axial formality and tree plantings but at a substantially reduced scale. Ultimately, none of the planned monuments or statutes were placed within Memorial Circle.

Today, Memorial Circle functions as a major traffic rotary and heavily used multimodal hub, connecting Arlington Memorial Bridge, the George Washington Memorial Parkway, Route 50/Arlington Boulevard, and access roads to Arlington National Cemetery. The area accommodates consistently high levels of vehicular traffic, particularly during weekday commuting periods, creating a busy and complex circulation traffic circulation for all users, while pedestrians and cyclists move through key connections such as Memorial Bridge, the Mount Vernon Trail, and access points to Arlington National Cemetery and the Metrorail station. These high traffic volumes also generate consistently elevated ambient noise levels throughout Memorial Circle, with continuous roadway traffic and frequent aircraft overflights contributing noise to the soundscape. Visitation is driven largely by commuters, recreational trail users, and visitors traveling to nearby destinations rather than to the Circle itself. Most pedestrians and cyclists pass through the area via the Mount Vernon Trail, Memorial Bridge, or access from the Cemetery and Metrorail station. Although the Circle offers notable views of the Lincoln Memorial, Arlington House, and the Potomac River, the overall experience is dominated by transportation activity and is typically brief. For more information about traffic, circulation, visitor experience and noise at Memorial Circle, see Sections 3.7, 3.8 and 3.9 of the EA.

Memorial Circle sits within a broader project area that is defined by the historic axial views that connect the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, and Arlington House, views intentionally established to create a unified ceremonial landscape spanning the Potomac River. These reciprocal sightlines, still experienced today from both the Lincoln Memorial and Arlington House, are central to the historic character and visual integrity of the area. The area surrounding these views includes a concentration of cultural landscapes and historic districts that converge at or near Memorial Circle, including the George Washington Memorial Parkway; the Mount Vernon Memorial Highway-North Cultural Landscape; the Memorial Avenue Corridor; Lady Bird Johnson Park; the Lincoln Memorial cultural landscape; Arlington National Cemetery; the Arlington House Cultural Landscape; the National Mall Cultural Landscape; the Washington Monument and Grounds Cultural Landscape; and the Thomas Jefferson Memorial Cultural Landscape.

Although the broader project area contains several recorded archeological resources, no archaeological sites were identified within the construction area. Memorial Circle sits atop-fill that substantially limits the likelihood of intact archeological deposits. For specific information about the historic views, cultural landscapes and historic districts, as well as other historic resources affected and archeology, see Sections 3.2, 3.3, 3.4 and 3.5 of the EA.

Memorial Circle's nighttime setting is brightly illuminated by regional skyglow, vehicle lighting, and nearby ceremonial features. Eastward and axial views reveal iconic monuments, softened but still luminous surrounding landscapes, and intermittent aircraft lighting, all contributing to an urban night sky.

The project area supports typical urban parkway resources, including wildlife species, maintained vegetation, and landscaped soils shaped by decades of transportation use and routine management. Natural ecological functions are limited due to the highly engineered setting. Among these resources, groundwater and surface water are the most relevant to the project. Groundwater occurs in shallow, perched conditions influenced by the nearby Potomac River, generally about 15 feet below the surface, and fluctuates seasonally and during major storm or tidal events. Surface water within Memorial Circle is entirely engineered: rainfall drains across paved and landscaped areas into storm inlets and is conveyed toward the Potomac River, with no natural surface water features present. As a result, hydrologic conditions in the area are dominated by stormwater runoff, engineered drainage, and river stage fluctuations. For additional information on effects to the park's natural resources, see Section 3.6 of the EA and Appendix A.

Short and Long-term Beneficial and Adverse Effects

Cultural Resources – Historic Views

The Triumphal Arch would alter several historic views throughout the Memorial Avenue corridor, most notably the longstanding axial alignment between Arlington House and the Lincoln Memorial. The Arch would occupy the center of this designed vista, obstructing the reciprocal view and impacting the clarity of this sightline. Partial obstructions would occur in views between the Arlington Hemicycle and the Lincoln Memorial and in east–west and north–south views across Memorial Circle, where the Arch would reduce openness and introduce a new visual focal element. Although these changes represent adverse effects on the integrity of the corridor's historic viewshed, the defining spatial organization of the landscape remains discernible, and the Lincoln Memorial, Arlington House, and other major landmarks would remain visible in broader panoramic views. Because the project does not eliminate historic visual relationships but modifies them in ways that remain understandable within the designed landscape, these adverse changes do not reach the threshold of significance and would not impede visitors' ability to perceive or interpret the historic setting.

The Triumphal Arch would be visible from some locations within Arlington National Cemetery, where it would appear as a new focal point within the broader commemorative landscape. This visibility, however, does not constitute a significant impact because it does not diminish visitors' ability to perceive or interpret the historic landscape and commemorative views. The Arch appears only as a distant, middle-ground element, and its presence does not alter the Cemetery's defining qualities of solemnity, setting, or use. Additionally, long-standing regional development within Washington, D.C., together with varied topography and vegetation, already contributes to a visually heterogeneous environment in which contemporary structures are occasionally discernible. When considered within this broader visual context, the incremental changes to historic views from the Cemetery do not rise to the level of significance.

The Triumphal Arch would introduce a new focal point from views from the Netherlands Carillon grounds and U.S. Marine Corps War Memorial as well as other locations within George Washington Memorial Parkway. Although the Triumphal Arch would be present in views from these locations, its visibility does not constitute a significant impact because it does not obstruct or diminish the primary, character-defining views toward the monumental core or surrounding commemorative landscape. In these locations, the Arch appears as a secondary element within a broad panoramic setting dominated by long-established focal points such as the Lincoln

Memorial, Arlington Ridge, and the Washington Monument. The existing landscape is already visually diverse due to topography, vegetation, and surrounding development. When considered in this broader visual context, the incremental change introduced by the Arch does not rise to the level of significance.

In addition, early design concepts for Memorial Circle envisioned additional architectural features, including two large commemorative columns, that would have introduced prominent vertical elements into the same views. These unbuilt components demonstrate that substantial structural features were once anticipated as part of the Circle's monumental composition and would themselves have altered or partially interrupted the historic sightlines. In this context, the Arch's modification of views represents a shift consistent with the corridor's longstanding design evolution, and the presence of a significant vertical form is not wholly incompatible with the area's historic planning framework.

Cultural Resources – Cultural Landscapes and Historic Districts

The Triumphal Arch would affect all the cultural landscapes within the project area by introducing a prominent vertical structure into settings historically defined by low horizons and open spatial organization. Within the George Washington Memorial Parkway cultural landscape, the Arch would interrupt long, horizontally oriented views that emphasize natural scenery and modestly scaled built features, becoming a dominant visual element along a route intentionally designed to foreground the Potomac River corridor. In the Memorial Avenue Corridor, the Arch would modify the formal axial organization and symmetrical plantings that define the procession between Arlington National Cemetery and the monumental core, altering views toward the Lincoln Memorial and reshaping the historic experience of movement along the axis. Along the Mount Vernon Memorial Highway, the Arch would introduce a noticeable new vertical feature that subtly alters long-distance vistas and affects the carefully composed scenic experience at the highway's northern terminus, where views transition toward Arlington Memorial Bridge and Memorial Circle. Similar changes would occur in Lady Bird Johnson Park, where the Arch would alter the naturalistic river landscape intended to contrast with the more formal monumental core, and in views from the Lincoln Memorial, where the Arch would intrude into long established cross-river vistas toward Arlington House. From Arlington National Cemetery and from Arlington House, the Arch would appear as a prominent center feature that interrupts the historic axial view between the mansion and the Lincoln Memorial, as well as the view from the Cemetery's historic orientation toward Washington, D.C. Within the National Mall Cultural Landscape, the Arch would introduce a new vertical focal point into long-range reciprocal views toward the Arlington Memorial Bridge and Memorial Circle, subtly modifying the broader skyline, monumental axes, or historic spatial organization. Within the Washington Monument and Grounds Cultural Landscape, the Arch would impact the established axial sightlines and diminish the Monument's traditional visual primacy by adding a competing illuminated vertical element to the Monumental Core. From the Thomas Jefferson Memorial Cultural Landscape, the Arch would be visible within key reciprocal views toward the Lincoln Memorial, subtly weakening the clarity of long-standing McMillan Plan relationships despite partial screening by vegetation around the Tidal Basin.

These effects must be evaluated in light of Memorial Circle's own design history. Early planning concepts for Columbia Island envisioned a highly symbolic plaza with two monumental 166-foot columns, each topped with a winged figure, establishing a strong vertical expression at the heart

of the Circle. These early design concepts demonstrate the intent to build a tall architectural feature at this location. Over the years, the Circle's design underwent multiple revisions, each reviewed by the Commission of Fine Arts, as the designs were gradually scaled back, simplified, and reshaped. By the early 1930s, the Circle had taken on its current form as a single traffic rotary with modest basins and plantings outside the circle. Later planning documents have likewise recognized Memorial Circle as an appropriate location for architectural features. Because the site has historically accommodated shifting design intentions and evolving landscape concepts, the introduction of a new architectural feature, while taller than the originally proposed columns, is consistent with the Circle's planning evolution and can be understood as aligning with its later role as a formalized node capable of supporting architectural expression.

While the Arch would introduce permanent adverse effects by altering view composition, diminishing openness, and changing the visual hierarchy among contributing features, the defining characteristics of the cultural landscapes would remain discernible. The primary spatial organization of the Parkway, the Memorial Avenue Corridor, and the cross-river alignment would continue to be understood; contributing features such as the Lincoln Memorial, Arlington House, Arlington National Cemetery, the Potomac River, and the surrounding parklands would remain visible in broader panoramas; and historic visual relationships, though modified, would generally not be eliminated. The contributing elements of these landscapes retain their experiential and interpretive coherence, even with the introduction of a new focal element.

Views from the Arch itself could strengthen these visual relationships by offering new elevated perspectives that reveal the continued alignment of major landmarks within the broader cultural landscape. For all of these reasons, the impacts, though adverse and in some cases substantial, would not rise to the level of significance, as they do not eliminate visitors' overall ability to perceive, understand, or interpret the historic setting.

In addition to the long-term impacts associated with placement of the Arch, installation of utilities and Arch-related construction activities would introduce short-term adverse effects on cultural landscapes and historic districts. These construction activities would be temporary and, for utilities, limited in spatial extent at any given time; therefore, their effects would not rise to the level of significant impacts. Installation of new utilities on or within historic bridges would occur alongside existing utility lines and would not alter the character-defining features or qualities that convey the bridges' historic significance. Subsurface placement would leave the bridges' appearance unchanged once surfaces are restored, and any exterior additions would be minor and incremental. These changes would not diminish the bridges' integrity of design, materials, workmanship, or setting, nor would they measurably affect their contribution to the surrounding cultural landscape. Accordingly, these effects would not constitute a significant impact.

Cultural Resources – Archeology

Construction of the proposed action would involve both permanent and temporary ground disturbance associated with installation of the Arch foundation, landscaping, grading, stormwater management features, utilities, and construction staging areas. Utilities would be routed within existing roadways or alongside previously disturbed corridors that do not contain identified archeological resources.

To evaluate the potential for impacts to archeological resources within Memorial Circle, NPS completed a cut-and-fill analysis and subsequent geomorphological investigation. These studies determined that Memorial Circle is underlain by substantial historic fill and identified no intact archeological sites within the area that would be affected by construction of the Arch. Based on these findings, the potential for impacts to archeological resources within Memorial Circle is low, and no additional archeological investigations are warranted. Because no archeological resources have been identified within the Arch footprint, and utility-related impacts would be avoided, the proposed action would not result in significant adverse impacts to archeological resources.

Water Resources

Although the proposed action would alter infiltration by replacing the central lawn with an impermeable surface, any required dewatering or subsurface construction would follow standard geotechnical practices and adhere to District and federal requirements, preventing uncontrolled groundwater effects. The shallow groundwater system beneath Memorial Circle is already primarily governed by natural Potomac River fluctuations, clay lenses, and discontinuous fill layers, and these processes would continue independent of the project. While perched groundwater could locally mound or become pressurized, conditions typical of Potomac terrace soils, such effects can be effectively managed through routine monitoring and maintenance. Because the project does not introduce long-term hydrologic modifications to groundwater, these changes would not substantially alter groundwater availability, flow patterns, or aquifer conditions, and therefore would not rise to the level of significant impacts.

Surface water behavior within Memorial Circle is fully controlled by engineered stormwater systems and the adjacent Potomac River's tidal regime. Although the project would increase impervious area and therefore runoff volumes, stormwater would continue to be captured and conveyed through existing (and if necessary, upgraded) drainage infrastructure designed to handle roadway discharge. The site lies outside the 100- and 500-year floodplains, and the project would not alter riverine hydrology, tidal patterns, or flood risk. With appropriate stormwater infrastructure and adherence to District and federal requirements, runoff increases would not result in changes to Potomac River conditions, sedimentation, or long-term reductions in water quality. Because drainage would remain fully contained within engineered systems, no significant surface-water impacts are anticipated.

Traffic and Circulation

During the two– to three–year construction period, cyclists and pedestrians would encounter temporary detours that, in some cases, lengthen travel routes. For much of this period, users approaching from the south side of Memorial Circle would be rerouted to the north side, increasing travel times and reducing the directness of access to the Mount Vernon Trail, the Metrorail station, and Arlington National Cemetery. Although all detours would remain accessible, users could still face navigational challenges; these would be mitigated through clear signage and active wayfinding. Pedestrians would also experience closer proximity to construction equipment, noise, temporary barriers, and occasional overlap with regional infrastructure projects, which could compress foot traffic into fewer open corridors and create variability in walking times. Throughout construction, NPS would maintain safe conditions through established Maintenance of Traffic (MOT) measures. At the conclusion of construction, all temporary detours and closures would be removed, and bicycle and pedestrian circulation

would return to similar patterns as was present before construction, with small variations. Because these effects would be temporary, localized to the immediate project area, fully mitigated through established MOT practices, similar in scale to routine construction disruptions in the region, and would continue to allow access to the area through detours without causing traffic or circulation delays, they would not rise to the level of significant impacts.

Even with the projected increase in visitors to Memorial Circle, the proposed traffic and circulation improvements would provide substantial long-term safety and mobility benefits for pedestrians and bicyclists. These improvements would also maintain stable traffic operations, and long-term traffic delays are not anticipated once the final circulation pattern is implemented. New fully signalized crossings, simplified controls, and expanded refuge islands would reduce conflict points and create more intuitive travel paths. Improved sight distance and design features such as raised crossings, curb extensions, and coordinated wayfinding would further enhance driver awareness and support safe, orderly movement. Together, these elements would result in a beneficial effect on nonmotorized circulation and safety and no significant adverse impacts.

Similarly, the proposed action would not result in significant impacts on parking availability at Arlington National Cemetery. Because existing personal-vehicle parking facilities typically operate well below capacity and are anticipated to accommodate additional personal-vehicle demand, there would be no significant adverse impacts on personal-vehicle parking availability at Arlington National Cemetery. Drop-off areas for buses and motorcoaches would continue to operate at or near capacity; however, impacts from the proposed action would not be significant because the number of additional buses associated with the project is not expected to increase substantially, existing overflow parking along Memorial Avenue would continue to be available, and, should demand increase in the future, additional designated bus or motorcoach drop off are could be considered in the future to improve circulation.

Visitor Experience

Under the selected action, visitors would experience temporary adverse effects during construction. Detours, lane closures, trail adjustments, and construction activity would interrupt normal travel patterns and increase noise and visual intrusions. These effects would be limited to the two- to three-year construction period and carefully managed through established measures to maintain safe pedestrian and cyclist movement while keeping traffic flowing. Because the disruptions would be temporary, localized to the roads, trails and sidewalks near Memorial Circle, and similar in scale to routine construction activity commonly experienced in the region, these construction impacts are not considered significant adverse impacts to the visitor experience.

Once complete, the project would create a new visitor destination at Memorial Circle, a beneficial impact to visitors. Visitors approaching from the National Mall or from Arlington National Cemetery would experience prominent views of the Arch as they arrive, and upgrades, including improved signaling, raised crosswalks, enhanced wayfinding, and bicycle racks, would substantially improve safety and navigation compared to existing conditions. The Arch itself would introduce a new interpretive opportunity, offering interior exhibits, ADA accessible visitor amenities, and elevated views toward major landmarks.

The Arch would also introduce permanent changes to some long-familiar views, including interruption of the historic axial sightline between the Lincoln Memorial and Arlington House.

Some visitors may perceive this as an adverse change to the visual character of the landscape. However, these changes would not constitute significant adverse impact to visitor experience because many established views would remain available and the Arch would create new elevated and framed views that enhance the visual experience of the area.

Overall, although the proposed action would introduce temporary construction impacts and permanent modifications to certain views, these effects would not result in significant adverse impacts as described above. In the long term, the project would substantially improve visitor safety, accessibility, interpretive opportunities, and amenities at Memorial Circle.

Noise

Although construction of the Triumphal Arch would generate intermittent high-intensity noise, particularly during pile-driving activities, these effects would be temporary, localized, and effectively minimized through mandatory use of noise blankets. Parts of Arlington National Cemetery are considered a setting where serenity and quiet are essential to its purpose. Modeling demonstrates that the required noise blanket would reduce peak sound levels, including at sensitive receptor locations within Arlington National Cemetery, keeping nearly all areas, including the Tomb of the Unknown Soldier and primary ceremonial spaces, below 57 dBA. Because pile driving is limited in duration and would occur only during a discrete phase of construction, higher noise levels would not persist throughout the overall construction period, and subsequent work would produce substantially lower sound levels.

Some sound from construction activities would be audible across the Potomac River near the Lincoln Memorial and adjacent recreational areas; however, the combination of distance, existing urban ambient noise, and the temporary nature of the work would prevent disruption or permanent changes to the soundscape. With noise blankets in place, no substantial noise propagation toward the Lincoln Memorial and other commemorative landscapes across the Potomac is expected. Nighttime activities would be more perceptible due to lower background noise, but these effects would remain transient and would cease upon project completion.

In summary, because construction noise would be intermittent, confined to active work areas, and substantially reduced through the required noise blankets that minimize the loudest activities, the proposed action would not significantly affect the acoustic environment. Construction noise would not significantly degrade the ceremonial or contemplative qualities of Arlington National Cemetery or other commemorative locations within the George Washington Memorial Parkway, nor would it significantly alter the acoustic character of commemorative areas across the Potomac River. As a result, the temporary nature of the noise, combined with effective attenuation measures and already elevated ambient sound levels, means that construction noise would not rise to the level of significance.

Night Skies

Night skies from Memorial Circle are characterized by a bright, urban night-sky environment shaped by regional skyglow, monument lighting, roadway illumination, and aviation activity. The proposed lighting on the Arch, including illumination of the Circle, the Arch walls, and the FAA-required lighting on the roof, would introduce a new prominent vertical light source and increase localized skyglow; however, these effects would occur within an already highly luminous setting with substantial existing artificial light. Fully shielded fixtures around Memorial Circle and tapered illumination on the Arch’s surfaces would limit light spill and

reduce unnecessary brightness. Although the statuary lighting and torch would be visible from portions of the surrounding landscape, the incremental increase in brightness would not meaningfully alter nighttime functioning. Because the surrounding area already experiences substantial ambient lighting, and because the project incorporates lighting controls that minimize skyglow and off-site glare to the extent possible and are consistent with existing lighting on nearby memorials and monuments, the anticipated changes would not rise to the level of significant impacts on night-sky quality or the nighttime experience of the broader ceremonial landscape.

Effects on Public Health and Safety

As required by the DOI NEPA Handbook, NPS is assessing the significance of the proposed action's effects on public health and safety. The proposed action would not result in significant adverse effects on public health and safety. Construction would be limited to Memorial Circle and adjacent staging areas, requiring temporary closures, detours, and Maintenance of Traffic measures. These short-term conditions are typical of major civil work and would be carefully managed through peak-hour avoidance, real-time queue monitoring, signal timing adjustments, and continuous ADA-compliant pedestrian routes. Thus, none of the short-term construction impacts are expected to result in a significant impact on public health or safety. As described in Appendix A of the EA, associated equipment use and vehicle trips would not significantly affect regional air quality, with emissions remaining well below applicable thresholds. During construction, certain travel routes for pedestrians, cyclists, and motorists may be temporarily rerouted or restricted to maintain a safe environment, with all changes clearly marked and managed under NPS safety protocols.

Even with the anticipated increase in visitors to Memorial Circle, improvements to circulation and safety at Memorial Circle, including signalized crosswalks, reduced conflict points among travel modes, and upgraded pedestrian and bicycle facilities, would provide long-term safety benefits without disrupting traffic flow. Thus, the proposed action would result in safety improvements for pedestrians and cyclists.

Although Memorial Circle is used intermittently (approximately five times per year) for Park Police medevac operations, the Park Police have identified other nearby areas that can safely accommodate helicopter landings when operational needs require. While Memorial Circle offers a convenient location, the availability of these alternative sites ensures that emergency response functions would continue without meaningful disruption. As a result, removing the Circle from medevac use would not result in significant changes to public safety or diminish overall emergency response capability.

Because of Memorial Circle's proximity to Ronald Regan Washington National Airport, NPS has considered whether the proposed project would adversely affect aviation safety. NPS does not possess specialized expertise in aviation safety and therefore relies on the expertise of the Federal Aviation Administration (FAA). The FAA completed a feasibility study and concluded that the proposed project would have no significant adverse effect on airspace or on visual or instrument procedures at Ronald Reagan Washington National Airport and would not have any effect on airport facilities or radio/visual navigational and landing aids. FAA subsequently completed an aeronautical study for the Arch and concluded, "the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft

or on the operation of air navigation facilities," and that the Arch would not be a hazard to air navigation (Federal Aviation Administration. 2026. *Determination of no hazard to air navigation*: 2026-AEA-8628-OE [Report]. Obstruction Evaluation Group. Available at: *https://oeaaa.faa.gov*). The FAA feasibility study and aeronautical study determined that the Arch would require an obstruction light. The FAA approved a natural-gas-powered flame on the torch atop the Arch's tallest statuary. The "eternal flame" will serve as the Arch's required obstruction light (Federal Aviation Administration, 2026). The National Park Service will implement any required mitigation measures and will address additional FAA compliance steps as the project progresses through subsequent design and implementation phases.

The proposed action does not involve hazardous materials or other threats to human health. While construction would cause temporary, localized disruptions, it would not introduce significant adverse health or safety risks. Instead, the project would enhance safety for pedestrians and bicyclists moving through Memorial Circle.

Economic Effects

As required by the DOI NEPA Handbook, NPS is assessing the significance of any economic effects. NPS considered economic impacts but dismissed them from detailed analysis, as explained in Appendix A of the EA. The socioeconomic environment around Memorial Circle includes a mix of local, regional, and national businesses, government facilities, residences, and tourism destinations; however, Memorial Circle itself is not a visitor draw and functions primarily as a transportation space rather than an economic destination. Construction of the proposed Arch would introduce temporary changes to travel patterns for pedestrians, cyclists, and motorists, creating limited short-term inconvenience but no meaningful effects on the regional economy, tourism sector, or local employment.

The proposed Arch would create a new visitor experience along the corridor of national remembrance, potentially including an exhibit space, café, gift shop, and elevated viewing platform. Although visitation could increase substantially once the Arch opens, visitors to Washington, D.C. typically visit multiple monuments, museums, and attractions during a single trip. As a result, while the Arch would contribute incrementally to the collective economic activity generated by the region's cultural destinations, it would not constitute a major economic driver on its own. Construction would also produce a short-term need for workers and minor increases in local business activity, but these effects would be small relative to the size of the surrounding economy and would be below the level of detection. For these reasons, there would be no significant adverse economic effects from the project.

Effects on the Quality of Life of the American People

As required by the DOI NEPA Handbook, NPS is assessing the significance of the proposed action's effects on the quality of life of the American People. As described in the EA, the proposed action would affect visitor access and experience at Memorial Circle, resulting in both adverse and beneficial impacts. In the short term, construction activity, limited access, and temporary detours would create adverse effects for pedestrians, cyclists, and motorists moving through the area. Over the long term, however, the completed Triumphal Arch and associated improvements would reopen to the public and enhance opportunities for meaningful engagement with the historic ceremonial landscape connecting Washington, D.C. and Arlington. The improvements to traffic and circulation under the proposed action would benefit the American

people by enhancing circulation, safety, and the overall ease of travel through this prominent gateway, specifically pedestrians and cyclists traveling between the National Mall and Arlington National Cemetery.

Although some historic views would be adversely affected, the proposed action would not reduce educational opportunities or significantly adversely impact public understanding of the surrounding park areas. Rather, the Triumphal Arch would provide new opportunities for interpretation, orientation, and reflection within a nationally significant setting. Over time, the Arch would directly benefit the American people by creating a new public space for viewing, learning, and appreciating the historic Potomac River corridor and its monumental alignments. The Arch's visitor facilities, including its exhibit space, mezzanine level, and public amenities described in the EA, would offer an improved and accessible environment for experiencing the area's history and landscape.

Collectively, the Arch would reinforce shared civic identity, strengthen public appreciation for this nationally important setting, and contribute positively to the quality of life of the American people.

The proposed action would not restrict the public's ability to consume, purchase, or use products from public lands. It would also have no impact on public services, traditional land and water use practices, or the cultural heritage of Native American communities. Additionally, the selected alternative would not affect passive recreational use of ecosystems.

APPENDIX E

NATIONAL HISTORIC PRESERVATION ACT CONSULTATION CORRESPONDENCE

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

June 5, 2026

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Subject: Notification of Adverse Effect Determination and Invitation to Participate in Section 106 Consultation for the Triumphal Arch Project, George Washington Memorial Parkway, Washington, DC

Dear Executive Director:

Pursuant to Section 106 of the National Historic Preservation Act, as amended (54 U.S.C. § 306108), and its implementing regulations at 36 C.F.R. Part 800, the National Park Service (NPS) is notifying the Advisory Council on Historic Preservation (ACHP) that the NPS has determined that the proposed Triumphal Arch Project in George Washington Memorial Parkway, Washington, DC, would result effects meeting the criteria of 36 CFR § 800.5(a)(1). The NPS also invites the ACHP to participate in consultation regarding this undertaking pursuant to 36 C.F.R. § 800.6(a)(1).

The NPS is the lead federal agency for the undertaking. The proposed action involves construction of a new Triumphal Arch within Memorial Circle, together with associated plaza and landscape improvements, utility and stormwater infrastructure, traffic and pedestrian circulation modifications, security features, lighting, and temporary staging and laydown areas required for construction. The site is located within a ceremonial, commemorative, and transportation setting associated with Arlington Memorial Bridge, the Memorial Avenue Corridor, Lady Bird Johnson Park, Arlington National Cemetery, Arlington House, and the broader monumental core of Washington, DC.

The proposed Arch would be a reinforced concrete structure clad in granite and ornamented with statuary and sculptural elements. The principal architectural mass would rise approximately 166 feet above finish grade, with surmounting statuary extending the total height to approximately 250 feet. The undertaking would include site development within and immediately around Memorial Circle, including a paved plaza, security barriers and bollards, exterior and interior lighting, surveillance and access-control systems, security screening facilities, utility extensions,

stormwater management features, and both temporary and permanent changes to traffic and pedestrian circulation.

The NPS has identified an Area of Potential Effects (APE) for the undertaking that includes areas subject to direct and indirect effects, including physical alteration, visual effects, circulation and access changes, and contextual effects. Historic properties within the APE include, among others, the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and associated historic districts, cultural landscapes, and contributing features. The NPS has also completed a Phase IA Archaeological Assessment, which concluded that the direct-effects APE has moderate to high archaeological sensitivity for intact precolonial and historic archaeological resources beneath twentieth-century fill and that additional archaeological investigation may be warranted depending on the final depth and extent of disturbance.

The NPS has determined that the undertaking would introduce a new permanent structure and associated physical, visual, and contextual changes into Memorial Circle and the surrounding historic setting. The NPS has concluded that the undertaking would alter characteristics of historic properties that qualify them for inclusion in the National Register of Historic Places in a manner that could impact their integrity of setting, design, feeling, and association. Accordingly, the NPS has found that the undertaking would have effects meeting the criteria of 36 CFR § 800.5(a)(1).

Due to the undertaking's phased nature, the NPS had developed a draft Programmatic Agreement (PA) to govern the resolution of adverse effects associated with the undertaking. The NPS believes that a PA is appropriate because aspects of the undertaking, including final design details, construction methods, utility alignments, stormwater features, traffic and pedestrian modifications, and treatment measures for affected historic properties, will continue to be refined as the project advances.

The NPS initiated consultation with the District of Columbia Historic Preservation Office and Virginia Department of Historic Resources on June 5, 2026, and is continuing consultation to refine the Area of Potential Effects, identify and assess effects on historic properties, and develop measures to avoid, minimize, and mitigate adverse effects.

Given the importance of the historic setting, the presence of multiple nationally significant historic properties, and the nature of the effects, the NPS respectfully requests that the ACHP advise whether it wishes to participate in consultation for this undertaking. If the ACHP elects to participate, the NPS would welcome its involvement as consultation proceeds.

For your review, and in partial fulfilment of 36 CFR § 800.11(e), the NPS is enclosing the:

- Assessment of Effects
- Draft Programmatic Agreement
- Phase IA Archaeological Assessment

The NPS will work with the DC HPO, VA SHPO, and other consulting parties through the Section 106 consultation process. The NPS also invites the ACHP to participate in a virtual consulting party meeting on June 15, 2026, from 1:00 p.m. to 3:00 p.m. Eastern Time. Meeting information will be transmitted separately.

Please let us know by June 15, 2026, whether the ACHP intends to participate in consultation. The NPS shall provide all documentation identified in 36 CFR § 800.11(e) as consultation continues. If you have any questions or need additional information, please contact Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Sincerely,

Jennifer T. Nersesian
Regional Director, National Capital Region
National Park Service

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

June 5, 2026

Mr. David Maloney
District of Columbia Historic Preservation Office
District of Columbia Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act for the Proposed Triumphal Arch at Memorial Circle, Washington, DC, and Request to Consolidate Consultation Pursuant to 36 CFR § 800.3(g)

Dear Mr. Maloney:

The National Park Service (NPS) is initiating consultation with the District of Columbia Historic Preservation Officer (DC HPO) pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800, regarding a proposed undertaking involving construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. The NPS is the lead federal agency for this undertaking and has determined that the proposed action is an undertaking subject to Section 106 and has the potential to affect historic properties.

Pursuant to 36 CFR § 800.3(g), the NPS requests the DC HPO's concurrence that consultation for this undertaking address multiple steps in §§ 800.3 through 800.6. Given the likelihood that identification efforts of historic properties, APE development, effects analysis, and treatment measures will continue to be refined as project planning advances, the NPS believes that consolidated consultation is the most efficient and appropriate means of carrying out review under Section 106.

Please see the following set of attachments that support the NPS determination of effect: List of Invited Consulting Parties; Assessment of Effects; Phase IA Archaeological Assessment; and the Draft Programmatic Agreement.

Consultation and Next Steps

The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1). The undertaking would introduce a new permanent structure, associated hardscape, lighting, security elements, utility infrastructure, stormwater facilities, and traffic and pedestrian

circulation changes into the Memorial Circle setting and would thereby alter characteristics of historic properties that qualify for inclusion in the National Register of Historic Places. In particular, the undertaking has the potential to impact the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and other related historic properties within the area of potential effects. The undertaking would also introduce new visual elements not presently found within Memorial Circle and change physical features within the setting that contribute to the significance of the historic district and cultural landscape.

The NPS has also developed a draft Programmatic Agreement (PA) to govern resolution of adverse effects associated with the undertaking, and that draft PA is enclosed for the DC HPO's review and concurrence with this proposed approach. The NPS believes that a PA is appropriate for this project because of the phased nature; the number and variety of historic properties that may be affected; and the likelihood that avoidance, minimization, mitigation, design refinement, treatment measures, and post-review implementation commitments will need to be carried out over time and in coordination with multiple agencies and stakeholders. In addition, while NPS has determined the undertaking will have effects meeting the criteria found in 36 CFR § 800.5(a)(1), aspects of the project—including final design details, construction methods, utility alignments, stormwater features, traffic and pedestrian modifications, and treatment measures for affected historic properties—will continue to be refined as the project advances. A PA would provide an appropriate and efficient mechanism to document agreed-upon measures to resolve effects meeting the criteria found in 36 CFR § 800.5(a)(1), establish procedures for review of subsequent design development and implementation, identify roles and responsibilities of the signatories and consulting parties, and ensure that the resolution of adverse effects remains integrated with the project's ongoing planning, engineering, and construction processes.

Section 106 consultation for the proposed undertaking is being initiated with DC HPO, VDHR, and other entitled consulting parties per 36 CFR § 800.2(c)(1)-(3). These parties are marked with an asterisk in the list below. Other stakeholders and interested parties were invited to participate in consultation per 36 CFR §§ 800.2(c)(5) and 800.3(f)(2). The list below also includes parties from which NPS has received a request to consult, which NPS is still considering. All consulting parties and stakeholders were contacted via letters dated June 5, 2026.

The NPS also invites the DC HPO to participate in a virtual consulting party meeting on June 15, 2026, from 1:00 p.m. to 3:00 p.m. Eastern Time. Meeting information will be transmitted separately. Additionally, these materials will be available for public review from June 5, 2026, to June 15, 2026.

The NPS kindly requests the DC HPO's written response on or prior to June 15th regarding: (1) concurrence with NPS's proposal to consolidate consultation pursuant to 36 CFR § 800.3(g); (2) review of the enclosed APE and adverse effect finding; (3) review of the enclosed draft Assessment of Effect and Programmatic Agreement and (4) your review of the list of consulting parties pursuant to 36 CFR § 800.3(f).

Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

We appreciate your participation in this consultation and look forward to working with your office on this undertaking.

Sincerely,

Jennifer T. Nersesian
Regional Director, National Capital Region
National Park Service

Attachments:

- Assessment of Effects
- Draft Programmatic Agreement
- Phase IA Archaeological Assessment

Consulting Parties

- District of Columbia Historic Preservation Office*
- Virginia Department of Historic Resources*
- Advisory Council on Historic Preservation*
- Absentee Shawnee Tribe of Indians of Oklahoma Nation
- Catawba Indian Nation
- Chickahominy Indian Tribe
- Chickahominy Tribe Eastern Division
- Delaware Nation
- Monacan Indian Nation
- Nansemond Indian Nation
- Pamunkey Indian Tribe
- Rappahannock Tribe
- Shawnee Tribe
- Upper Mattaponi Indian Tribe
- National Capital Planning Commission
- Commission of Fine Arts
- Arlington County
- District of Columbia – Ward 2
- Arlington National Cemetery
- The Department of War
- The Trump-Kennedy Center
- National Park Service - National Mall and Memorial Parks

- National Park Service - Rock Creek Park
- National Park Service – National Capital Region National Historic Landscape Program
- Federal Highway Administration
- Architect of the Capitol
- Georgetown 2E ANC Commission

Other parties that have requested consulting party status

- National Trust for Historic Preservation
- Committee of 100 on the Federal City
- DC Preservation League
- The Cultural Landscape Foundation
- National Parks Conservation Association
- American Institute of Architects

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

June 5, 2026

Mr. Roger Kirchen
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act for the Proposed Triumphal Arch at Memorial Circle, Washington, DC, and Request to Consolidate Consultation Pursuant to 36 CFR 800.3(g)

Dear Mr. Kirchen:

The National Park Service (NPS) is initiating consultation with the Virgina Division of Historic Resources (VDHR) pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800, regarding a proposed undertaking involving construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. The NPS is the lead federal agency for this undertaking and has determined that the proposed action is an undertaking subject to Section 106 and has the potential to affect historic properties.

Pursuant to 36 CFR 800.3(g), the NPS requests the VDHR's concurrence that consultation for this undertaking address multiple steps in §§ 800.3 through 800.6. Given the likelihood that identification efforts of historic properties, APE development, effects analysis, and treatment measures will continue to be refined as project planning advances, the NPS believes that consolidated consultation is the most efficient and appropriate means of carrying out review under Section 106.

Please see the following set of attachments that support the NPS determination of effect: List of Invited Consulting Parties; Assessment of Effects; Phase IA Archaeological Assessment; and the Draft Programmatic Agreement.

Consultation and Next Steps

The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR

800.5(a)(1). The undertaking would introduce a new permanent structure, associated hardscape, lighting, security elements, utility infrastructure, stormwater facilities, and traffic and pedestrian circulation changes into the Memorial Circle setting and would thereby alter characteristics of historic properties that qualify for inclusion in the National Register of Historic Places. In particular, the undertaking has the potential to impact the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and other related historic properties within the area of potential effects. The undertaking would also introduce new visual elements not presently found within Memorial Circle and change physical features within the setting that contributes to the significance of the historic district and cultural landscape.

The NPS has also developed a draft Programmatic Agreement (PA) to govern resolution of adverse effects associated with the undertaking, and that draft is enclosed for the VDHR's review and concurrence with this proposed approach. The NPS believes that a PA is appropriate for this project because of the phased nature; the number and variety of historic properties that may be affected; and the likelihood that avoidance, minimization, mitigation, design refinement, treatment measures, and post-review implementation commitments will need to be carried out over time and in coordination with multiple agencies and stakeholders. In addition, while NPS has determined the undertaking will have effects meeting the criteria found in 36 CFR § 800.5(a)(1), aspects of the project including final design details, construction methods, utility alignments, stormwater features, traffic and pedestrian modifications, and treatment measures for affected historic properties will continue to be refined as the project advances. A PA would provide an appropriate and efficient mechanism to document agreed-upon measures to resolve effects meeting the criteria found in 36 CFR § 800.5(a)(1), establish procedures for review of subsequent design development and implementation, identify roles and responsibilities of the signatories and consulting parties, and ensure that the resolution of such effects remains integrated with the project's ongoing planning, engineering, and construction processes.

Section 106 consultation for the proposed undertaking is being initiated with DC HPO, VDHR, and other entitled consulting parties per 36 CFR § 800.2(c)(1)-(3). These parties are marked with an asterisk in the list below. Other stakeholders and interested parties were invited to participate in consultation per 36 CFR §§ 800.2(c)(5) and 800.3(f)(2). The list below also includes parties from which NPS has received a request to consult, which NPS is still considering. All consulting parties and stakeholders were contacted via letters dated June 5, 2026.

The NPS also invites the VDHR to participate in a virtual consulting party meeting on June 15, 2026, from 1:00 p.m. to 3:00 p.m. Eastern Time. Meeting information will be transmitted separately. Additionally, these materials will be available for public review from June 5, 2026, to June 15, 2026.

The NPS kindly requests VDHR's written response on or prior to June 15th regarding: (1) concurrence with NPS's proposal to consolidate consultation pursuant to 36 CFR § 800.3(g); (2) review of the enclosed APE and adverse effect finding; (3) review of the enclosed draft Assessment of Effect and Programmatic Agreement and (4) your review of the list of invited consulting parties pursuant to 36 CFR § 800.3(f).

Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

We appreciate your participation in this consultation and look forward to working with your office on this undertaking.

Sincerely,

Jennifer T. Nersesian
Regional Director, National Capital Region
National Park Service

Attachments:

- Assessment of Effects
- Draft Programmatic Agreement
- Phase IA Archaeological Assessment

Consulting Parties

- District of Columbia Historic Preservation Office*
- Virginia Department of Historic Resources*
- Advisory Council on Historic Preservation*
- Absentee Shawnee Tribe of Indians of Oklahoma Nation
- Catawba Indian Nation
- Chickahominy Indian Tribe
- Chickahominy Tribe Eastern Division
- Delaware Nation
- Monacan Indian Nation
- Nansemond Indian Nation
- Pamunkey Indian Tribe
- Rappahannock Tribe
- Shawnee Tribe
- Upper Mattaponi Indian Tribe
- National Capital Planning Commission
- Commission of Fine Arts
- Arlington County
- District of Columbia – Ward 2
- Arlington National Cemetery
- The Department of War
- The Trump-Kennedy Center
- National Park Service - National Mall and Memorial Parks

- National Park Service - Rock Creek Park
- National Park Service – National Capital Region National Historic Landscape Program
- Federal Highway Administration
- Architect of the Capitol
- Georgetown 2E ANC Commission

Other parties that have requested consulting party status

- National Trust for Historic Preservation
- Committee of 100 on the Federal City
- DC Preservation League
- The Cultural Landscape Foundation
- National Parks Conservation Association
- American Institute of Architects

Outlook

Proposed Triumphal Arch - Section 106 consultation meeting

Organizer	Stidham, Tammy <Tammy_Stidham@nps.gov>
Meeting time	This event occurred 4 months ago (Mon 15-Jun-26 11:00 AM - 1:00 PM)
Location	Microsoft Teams Meeting
My response	Not yet responded
Required attendees	Stidham, Tammy
Optional attendees	Gillham, Lindsay B
Message sent	Thu 11-Jun-26 9:48 AM

The National Park Service (NPS) is inviting you to participate as a consulting party in the review of a proposed undertaking pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800. The proposed undertaking involves construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. The NPS is the lead federal agency for this undertaking.

The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1). The undertaking would introduce a new permanent structure, associated hardscape, lighting, security elements, utility infrastructure, stormwater facilities, and traffic and pedestrian circulation changes into the Memorial Circle setting and would thereby alter characteristics of historic properties that qualify for inclusion in the National Register of Historic Places. In particular, the undertaking has the potential to impact the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and other related historic properties within the area of potential effects. The undertaking would also introduce new visual elements not presently found within Memorial Circle and change physical features within the setting that contributes to the significance of the historic district and cultural landscape.

Because of the phased nature of the undertaking, and because aspects of the project will continue to be refined during design development, the NPS has prepared a draft Programmatic Agreement (PA) to govern the resolution of adverse effects associated with the undertaking. The draft PA is intended to establish procedures for continued review, treatment, mitigation, and implementation as the project advances.

Enclosed link for your review are the following materials - https://parkplanning.nps.gov/triumphalarch

- Assessment of Effects
- Draft Programmatic Agreement

The NPS invites you to participate in a virtual consulting party meeting on June 15 from 1:00 p.m. to 3:00 p.m. Eastern Time. Meeting information will be provided separately. Additionally, these materials will be available for public review from June 5, 2026, to June 15, 2026.

Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Thank you for your consideration and participation in this consultation.

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

Microsoft Teams meeting

Join: https://teams.microsoft.com/meet/294632605765499?p=tbChYIF77WxwY6C8yl

Meeting ID: 294 632 605 765 499

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Travis Voyles
Vice Chairman

Reid J. Nelson
Executive Director

June 15, 2026

Jessica Bowron
Comptroller, exercising the delegated authority of the Director
National Park Service
1849 C Street, NW (Room 2721)
Washington, DC 20240

Ref: *Proposed Triumphal Arch Project*
Washington, District of Columbia
ACHP Case Number: 025123

Dear Ms.Bowron:

In response to the recent notification by the National Park Service, the Advisory Council on Historic Preservation (ACHP) will participate in consultation to develop a Section 106 agreement document for the referenced undertaking. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within the regulations, "Protection of Historic Properties" (36 CFR Part 800), implementing Section 106 of the National Historic Preservation Act. The criteria are met for this proposed undertaking because it will have substantial impacts on important historic properties, may present important questions of policy or interpretation, and has the potential for presenting procedural problems.

Section 800.6(a)(1)(iii) of these 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 Jennifer Nersesian Regional Director, National Capital Region, and Tammy Stidham, Associate Regional Director – Lands and Planning, of this decision.

Our participation in this consultation will be handled by Jaime Loichinger, who can be reached at (202) 517-0219 or via email at jloichinger@achp.gov. We look forward to working with your agency and other consulting parties to seek ways to avoid, minimize, or mitigate the undertaking's potential adverse effects on historic properties.

Sincerely,

Reid J. Nelson
Executive Director

Outlook

Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

From Mical Durak <mdurak@arlingtonva.us>
Date Mon 6/15/2026 5:08 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Lorin Farris <lfarris@arlingtonva.us>

1 attachment (219 KB)
2026_06_01-Arch_S106-DraftPA_HPP Comments.pdf;

Good evening, Tammy,

Thank you for the meeting hosted earlier today. Please see below for the comments on this project from Arlington County's Historic Preservation Program (HPP):

Main Comments for AoE and PA

1. The proposed 10-day review period for both the PA and AoE is an inconsiderate and inappropriate way to engage with consulting parties. It did not provide those parties enough time to review the materials, does not allow for a productive form of engagement, and does not follow the standard process for Section 106.
2. HPP concurs with the National Park Service that the construction of the arch would have an adverse direct and indirect effect on several historic resources in the Area of Potential Effects (APE). The construction of the arch in its current iteration would significantly impact the integrity of those historic resources, specifically their feeling, setting, and design.
3. The scale and massing of the arch is inappropriate in the context of its historic setting and would negatively impact the physical and symbolic unity conveyed via the Arlington Memorial Bridge and Memorial Avenue between the Lincoln Memorial and Arlington House as proposed in the McMillan Plan.
    a. Specifically, the arch is too large in scale and massing in relation to the Arlington Memorial Bridge (see pages 28 and 32 of the renderings provided in Appendix A).
    b. HPP staff strongly encourage NPS to explore other options for a design in this area that better complement the existing cultural landscape and historic resources.
4. HPP staff request a copy of the draft Environmental Assessment (EA) for the project when it is ready to share with consulting parties as we have questions about the Finding of No Significant Impact by NPS as noted on page 3 of the Programmatic Agreement.
5. The HPP finds that the proposed mitigation measures are lacking and do not appropriately address the need for mitigation given the major impact such an undertaking would have on these historic resources:
    a. The preparation of an updated National Register of Historic Places (NRHP) nomination does not specify which NRHP-listed resource, of which there are several in the area, will be updated.
    b. The proposed efforts to mitigate the visual impact of the arch only center on the refinement of designs for ancillary elements of the project, but not of the arch itself. HPP staff strongly encourage that the arch be scaled more appropriately with its surroundings.
    c. HPP staff strongly agree with the need for additional archaeological studies to occur prior to excavation and construction given the findings produced by NPS in their Phase IA of the site.

Specific Comments in PA

1. Page 2, "Whereas, in letters dated [insert date], the NPS informed the Federally recognized sovereign Indian Nations..." - *When did this occur? No date is listed. Were they also contacted on June 5th , 2026?*

2. Section E - Archaeology, 3.b.viii - "The NPS and DC HPO agree to review and return all comments within three (3) business days on drafts of the work plan..." - *Three days seems too short of a review period for such a review.*
3. Section E - Archaeology, 4. Precolonial Finds - "The NPS will notify Native American Tribes in the event that any precontact resources are discovered and considered potentially eligible for the National..." - *Shouldn't the tribes be contacted regardless of whether the resource is considered potentially eligible? Wouldn't they have a say in whether the resource might be potentially eligible or not?*
4. Section V.B - Treatment of Human Remains - "In the event human remains....are discovered...NPS will immediately halt subsurface construction disturbance in the area of the discovery and in the surrounding area where additional remains can reasonably be expected to occur..." - *It would be better to have a strict radius outlined here instead of using the vague "surrounding area."*
5. Section X. Amendments to the PA and Non-Compliance - *Will any such amendment be shared with stakeholders/other consulting parties for review?*

In conclusion, HPP staff's comments align with several of the comments made by both the DC SHPO and DHR offices during the call earlier today. We respectfully request that a proposed Section 106 timeline be shared with all consulting parties and that there be future consulting party meetings held on this topic. We welcome future opportunities to meaningfully engage in the Section 106 process for this undertaking in the future.

Thank you,

Mical Durak (she/her)
Historic Preservation Principal Planner
Department of Community Planning, Housing & Development
2100 Clarendon Boulevard, Suite 700
Arlington County, VA
mdurak@arlingtonva.us
(703) 228-3838 (office) or (571) 319-7433 (cell)
Any email sent to or from Arlington County email addresses may be subject to disclosure under the Freedom of Information Act (FOIA).
CPHD's mission is to support and guide how Arlington changes and grows physically, socially, culturally, and economically to create an environment that is vibrant, equitable, inclusive, and sustainable and which prioritizes public health and safety for all, now and in the future.

From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Sunday, June 14, 2026 3:55 PM
To: Mical Durak <mdurak@arlingtonva.us>
Cc: Lorin Farris <lfarris@arlingtonva.us>
Subject: Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

EXTERNAL EMAIL

Emailing is fine

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474

mobile- (202)438-0028
tammy_stidham@nps.gov

From: Mical Durak <mdurak@arlingtonva.us>
Sent: Friday, June 12, 2026 4:45 PM
To: Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc: Lorin Farris <lfarris@arlingtonva.us>
Subject: Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

Thank you for confirming, Tammy. Can you provide guidance on how NPS wants to receive comments? Would emailing you suffice or would they need to be submitted via the website?ParkPlanning - Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement

Mical Durak (she/her)
Historic Preservation Principal Planner
Department of Community Planning, Housing & Development
2100 Clarendon Boulevard, Suite 700
Arlington County, VA
mdurak@arlingtonva.us
(703) 228-3838 (office) or (571) 319-7433 (cell)
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From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Friday, June 12, 2026 1:41 PM
To: Mical Durak <mdurak@arlingtonva.us>
Cc: Lorin Farris <lfarris@arlingtonva.us>
Subject: Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

EXTERNAL EMAIL

They are due on June 15th at midnight

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028

tammy_stidham@nps.gov

From: Mical Durak <mdurak@arlingtonva.us>
Sent: Friday, June 12, 2026 12:50 PM
To: Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc: Lorin Farris <lfarris@arlingtonva.us>
Subject: Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

Hi Tammy,

Can you please clarify when comments from consulting parties and stakeholders are due? We want to ensure that we meet the deadline.

Thank you,

Mical Durak (she/her)
Historic Preservation Principal Planner
Department of Community Planning, Housing & Development
2100 Clarendon Boulevard, Suite 700
Arlington County, VA
mdurak@arlingtonva.us
(703) 228-3838 (office) or (571) 319-7433 (cell)
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From: Lorin Farris <lfarris@arlingtonva.us>
Sent: Friday, June 12, 2026 8:12 AM
To: Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc: Mical Durak <mdurak@arlingtonva.us>
Subject: Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

Thank you!

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From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Friday, June 12, 2026 7:46:41 AM
To: Lorin Farris <lfarris@arlingtonva.us>
Cc: Mical Durak <mdurak@arlingtonva.us>
Subject: Re: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

You don't often get email from tammy_stidham@nps.gov. Learn why this is important

EXTERNAL EMAIL
Just sent

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

From: Lorin Farris <lfarris@arlingtonva.us>
Sent: Thursday, June 11, 2026 3:34 PM
To: Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc: Mical Durak <mdurak@arlingtonva.us>
Subject: [EXTERNAL] Proposed Triumphal Arch - Section 106 consultation meeting

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good afternoon, Tammy,
Thank you for sending the consulting meeting invitation for the Proposed Triumphal Arch. Could you also invite my colleague, Mical Durak, as she manages our involvement with Section 106 projects for Arlington County. I can't seem to be able to forward the invite. Please let me know if that is possible.
Sincerely,
Lorin Farris

Lorin V. Farris (pronouns: she/her)
Arlington County | Historic Preservation Section Supervisor
Department of Community Planning, Housing & Development
703-228-3549 (office)
703-213-6154 (cell)
lfarris@arlingtonva.us

Any email sent from/to an Arlington County email address may be subject to disclosure under the Freedom of Information Act (FOIA).

CPHD's Mission: CPHD's mission is to support and guide how Arlington changes and grows physically, socially, culturally, and economically to create an environment that is vibrant, equitable, inclusive, and sustainable and which prioritizes public health and safety for all, now and in the future.

ENCLOSURE

The Committee of 100 on the Federal City

June 15, 2026

FROM: The Committee of 100 on the Federal City
945 G Street NW, Washington, DC 20001
www.committeeof100.net
chair@committeeof100.net

TO: Jennifer Madello, Superintendent, George Washington Memorial Parkway, NPS
Tammy Stidham, Associate Regional Director, Lands & Planning, NPS

CC: David Maloney, State Historic Preservation Officer, District of Columbia

SUBJECT: Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement (ID: 136973)

In response to the public notice posted on June 5, 2026, the Committee of 100 on the Federal City (Committee of 100) respectfully submits the following comments to the National Park Service regarding the proposal to construct a large, monumental arch in Memorial Circle (the Proposal) , at the west end of Memorial Bridge, as described in the materials posted on the National Park Service (NPS) web site.

First, from a procedural standpoint:

1. We reiterate our request (to Ms. Stidham, dated June 8, 2026) that the Committee of 100 be permitted to participate as a consulting party for the Section 106 consultations on the Arch Proposal initiated by the National Park Service.

2. We respectfully urge the National Park Service to provide the public with a more meaningful opportunity to provide comments to the National Park Service regarding the Proposal. It is deeply concerning that NPS has provided the public only 10 days (four of which are weekend days) to provide comments regarding a proposal of this magnitude and significant adverse impact on critical cultural landscapes within the Nation's Capital. We ask NPS to extend the public comment period for at least 30 days.

3. Given the limited opportunity for the public to provide comments to NPS, we ask that NPS give due consideration to the extensive record of public comments provided to the National Capital Planning Commission on the Proposal, which are posted on the NCPC's web site (https://www.ncpc.gov).

4. We urge NPS to defer finalizing any plans regarding the Project until proper authorization for the Project has been obtained from Congress, in order to ensure compliance with the Commemorative Works Act (40 U.S.C. §§ 8901–8909); and the Height of Buildings Act (Pub. L. 61-196, 36 Stat. 452 (1910), as amended, Pub. L. 113-103, 128 Stat. 1152 (May 16, 2014)) and 40 U.S.C. § 8106.

Second, from a substantive standpoint:

1. We agree with the NPS's determination in the Assessment of Effects Report (AOE) that the Project would adversely affect historic properties meeting the criteria found in 36 CFR § 800.5(a)(1) within the Area of Potential Effects because it would alter, directly and indirectly, characteristics of those properties that qualify them for inclusion in the National Register of Historic Places.

   We similarly agree that the Project would have adverse effects meeting the criteria of 36 CFR § 800.5(a)(1) that change the integrity of setting, design, feeling, association, and, in some instances, location by introducing visual, spatial, and physical changes that affect character-defining views, reciprocal vistas, circulation patterns, and designed landscape relationships.

   We believe those adverse effects are extremely significant and damaging to the cultural landscapes that help to define the character of the Nation's Capital. To be more specific, we ask that you consider our comments to the National Capital Planning Commission (appended below).

2. **We strongly disagree with the NPS's discussion of avoidance, minimization, and mitigation options as described in the AOE, which fail to consider either a no-build option, or any reasonable alternative location and/or design.**

   The failure to consider a no-build option and the NPS's apparent prior decision that the current planned location at Memorial Circle is the *only* option available to the agency was made, to our knowledge, without any consideration of (or opportunity for public comment regarding) the adverse potential impacts of that decision on historic properties under the National Historic Preservation Act, or on the cultural and historic aspects of the human environment under the National Environmental Policy Act, treating that decision as final (as the AOE does) effectively forecloses any meaningful opportunity to address those impacts.

   We urge NPS to reopen and reconsider this decision, and to initiate a public review process that allows serious consideration of alternatives and options that would eliminate or minimize the obvious adverse impacts of the current Proposal.

Thank you for considering the comments of the Committee of 100 on the Federal City.

Sincerely,
Judy Chesser
Judy Chesser, Chair

Founded more than a century ago, the Committee of 100 on the Federal City is a nonprofit organization dedicated to safeguarding and advancing Washington's historic distinction, natural beauty, and overall livability. The Committee's work recognizes the critical value of public planning, informed by traditions that originate from the L'Enfant Plan and the McMillan Commission, continuing to the current day.

Appendix

Committee of 100 Comments to the National Capital Planning Commission, filed June 2, 2026, regarding the Adverse Impacts of the Proposal:

The Proposal would adversely impact spatial relationships established under the McMillan Plan, and the primacy of the Lincoln Memorial as the western terminus of the National Mall

The *Report of the Senate Park Commission* (1902) (better known as the McMillan Plan) re-envisioned the Mall as a unified composition defined by long, uninterrupted perspectives and a clear hierarchy of elements. The Commission emphasized that "[t]he Mall should be treated as one broad, open, and continuous public ground." (McMillan Plan, p. 25.) The McMillan Plan establishes a dominant east–west axis culminating in a major memorial at the western end, the then-proposed Lincoln Memorial. (McMillan Plan, p. 51-52 and accompanying plates).

The siting of the Lincoln Memorial at that location was not incidental; it implemented the Commission's intent that the western terminus of the Mall be occupied by a single, commanding architectural focus aligned with the Capitol. (Id. See also National Park Service, *National Mall Cultural Landscape Report* (2010), ch. 2 (describing implementation of the McMillan Plan).)
It is telling that the McMillan Plan intentionally compares the proposed Lincoln Memorial to the *Arc de Triomphe* in Paris:

> At the [western end of the Mall], a great *rond pointe*, placed on the main axis of the Capital and the [Washington] Monument, becomes a gate of approach to the park system of the District of Columbia. Centering upon it as a great point of reunion are the drives leading southeast to Potomac Park and northwest by the Riverside Drive to the Rock Creek system of parks from this elevation of 40 feet. The Memorial Bridge leads across the Potomac directly to the base of the hill crowned by the mansion house of Arlington.
> Crowning the *rond pointe* as the *Arc de Triomphe* crowns the *Place de l'Étoile* at Paris, should stand a memorial erected to the memory of that one man in our history as a nation who is worthy to be named with George Washington - Abraham Lincoln. . . . Whatever may be the exact form selected for the memorial to Lincoln, and type it should possess the quality of universality, and also it should have the character essentially distinct from that of any monument either now existing in the District or hereafter to be erected. (McMillan Plan, pp. 51-52)

Installing an actual triumphal arch in the viewshed of the Lincoln memoria—and, to be specific, one that would be more than half again as tall as the *Arc de Triomphe* and more than double the height of the Lincoln Memorial as built—would diminish the fundamental character of the Lincoln Memorial as envisioned in the McMillan Plan. A new arch would compete directly with the Lincoln Memorial for primacy, undermining the hierarchy established by the Plan. The Lincoln Memorial's prominence derives from its isolation, proportional scale, and position at the terminus of a two-mile vista, rather than from sheer height alone. Introducing a massive vertical element into this composition would draw the eye away from the Lincoln Memorial, interrupting the intended visual progression along the axis of the Mall and minimizing the Lincoln Memorial by comparison, altering its perceived scale and authority.

We would also note that [NPCA's] Executive Director's Recommendations state that NCPC has consistently taken the position that the Height of Buildings Act applies to "all federal projects . . . consistent with Comprehensive Plan Policy UD.B.1.3, highlighting the focus on preserving

Washington's picturesque, horizontal character, and reinforcing the Height of Buildings Act." The Director continues by requesting that the applicant "provide, as part of the next submission, an analysis and justification for the project's height in light of the Height of Buildings Act." The Committee of 100 has been a strong supporter of the Height Act and believes it no less applicable to this proposal than to any other project in the District of Columbia.

The Proposal would adversely impact the cultural landscape The Lincoln Memorial and its Relationship to Arlington Cemetery

The McMillan Plan also recognizes the Lincoln Memorial as the "starting point" for a "concourse" connecting the National Mall, the then-planned Potomac Park on the Virginia side of the Potomac, and Arlington Cemetery. The Plan makes clear that this connection carries both spatial and symbolic meaning. (See generally McMillan Plan, pp. 55-59). The McMillan Plan emphasized the desirability of "broader and simpler" treatment for the Memorial Bridge, recommending "the removal of [central ornamental towers envisioned under a previous plan], which could conflict with the proposed Lincoln Memorial." (Id. pp. 57-58.) Those towers were considered by no less an authority than Frederick Law Olmsted, Jr.—the last surviving member of the McMillan Commission—as "so large and elaborate as to compete with the Lincoln Memorial… Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the plan of which it forms a part." See *Letter from Federick Law Olmsted, Jr. to Newton D. Baker*, April 4, 1916 (National Archives, Olmsted Assocs. Records). They were eliminated.

In the same way, the massive proposed triumphal arch, as currently planned, would disrupt the low-scale concourse and open viewshed between the Lincoln Memorial and Arlington Cemetery as envisioned by the McMillan Commission, which was eventually followed through in the design and construction of the Arlington Memorial Bridge.

The McMillan Plan similarly emphasized a "broader and simpler" treatment for the "reservations" on the west side of the Memorial Bridge, between "the Potomac Park and the Arlington Estate." (McMillan Plan at p. 58). The plan notes the visual power of simple monuments to the dead and warns against larger monuments that detract from the "simplicity and uniformity of the whole," stating that

> In particular, the noble slopes toward the river should be vigorously protected against the invasion of monuments which utterly annihilate the sense of beauty and repose. This is one of the most beautiful spots in the vicinity of Washington; it should not be defaced or touched in any way. . . . (McMillan Plan, p. 59.)

While the members of the McMillan Commission were referring to large monuments constructed as funerary memorials, the proposed construction of a massive triumphal arch of the immense size and scale as currently proposed—in the location currently proposed between the Memorial Bridge and Arlington Cemetery —would similarly violate that intention.

In summary, a new arch of overwhelming height and scale at the location proposed in the concept plan presented to the NCPC would:

- Displace the Lincoln Memorial as the dominant western focal point of the National Mall;
- Alter the perceived scale and importance of the memorial;
- Interrupt the visual, symbolic, and intentionally low-scale "concourse" between the Lincoln Memorial and Arlington National Cemetery; and
- Undermine the integrity of the McMillan Plan as a coherent composition.

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

David L. Bulova
Secretary of Natural and Historic Resources

Roger W. Kirchen
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

June 15, 2026

Ms. Jennifer T. Neresian
Regional Director, National Capital Region
National Park Service
5300 Wellington Branch Drive, Suite 100
Gainesville, Virginia 20155

Re: Triumphal Arch at Memorial Circle
Arlington, Virginia
DHR File No. 2026-4065

Dear Ms. Neresian:

The Department of Historic Resources (DHR) has received from the National Park Service (NPS) the initiation of consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA, 54 U.S.C. § 306108) and its implementing regulations 36 CFR Part 800, for the proposed construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway. The undertaking will be constructed in Washington, DC but will affect historic properties in Virginia. Our comments are provided to the NPS as assistance in meeting its responsibilities under the NHPA and 36 CFR Part 800 as the State Historic Preservation Office for Virginia. NPS requested DHR's concurrence to expedite review of this undertaking in accordance with 36 CFR 800.3 (g). NPS also provided and requested DHR's review of the Area of Potential Effect (APE) for the undertaking, lists and mapping of historic properties within the proposed APE, an assessment of effects report, and a draft Programmatic Agreement (PA) to "govern the resolution of adverse effects."

Per 36 CFR 800.3 (g), the Federal Agency and SHPO must *agree* that it is appropriate to address multiple steps under 36 CFR § 800.3 through § 800.6 as long as consulting parties and the public have an adequate opportunity to express their views. *It is DHR's opinion that this standard has not been met*. Even DHR has not been provided an adequate opportunity to review the project information. Considering the review period currently provided, the scope of the undertaking, the public interest in the project, the numerous significant historic properties within the APE, and the severity of the adverse effects, **DHR objects to expediting review in accordance with 36 CFR 800.3(g).**

NPS provided DHR, the District of Columbia (DC) Historic Preservation Office (HPO), consulting parties, and the public a total of 10 calendar days to provide comments on over 180 pages of materials. While the NPS requested SHPO concurrence with proposed expedition of the review, they also proceeded to attempt to compress and expedite the review under 36 CFR § 800.3 through § 800.6 into a single 10 day review. As DHR is objecting to the proposed

expedition of the review, DHR's comments are provided preliminarily regarding the initiation of the review under 36 CFR § 800.3, the scope of the undertaking, and procedural issues identified thus far. DHR also believes it is inappropriate to review a draft Programmatic Agreement before consulting parties and public comments have been received, reviewed, and meaningfully considered.

Within the time provided, DHR cannot verify the accuracy of the proposed Area of Potential Effects, the historic properties the NPS has identified within the APE, nor the correct application of the criteria of adverse effect in accordance with 36 CFR § 800.5. Our lack of comment on this information does not indicate concurrence with NPS' determinations. In accordance with 36 CFR § 800.3 regarding the initiation of consultation, DHR recommends that NPS grant consulting party status to those parties identified in your letter as requesting such and seek to identify additional consulting parties. DHR recommends the NPS invite the participation of: Preservation Virginia, the Virginia Museum of History and Culture (the Virginia Historical Society), Arlington Historical Society, Friends of Joint Base Myer-Henderson Hall, the Pentagon Memorial Foundation, the Virginia Secretary of Veterans and Defense Affairs, the Virginia Department of Veterans Services, the Veterans of Foreign Wars, the American Legion, and other veterans groups who may have an interest in the potential effects to Arlington National Cemetery.

While DHR cannot provide substantive comments on all materials provided related to review under 36 CFR § 800.4 through § 800.6, our initial review suggests further documentation to support the proposed APE is necessary due to the potential visual effects of such a large structure on the landscape; a viewshed study should be included in future supporting documentation of the APE determination. DHR also notes that NPS does not include any historic resources that are not listed in the NRHP or are established as NHLs in their table of identified historic properties. There are likely unlisted historic properties, previously determined eligible or which should be evaluated for eligibility, within the APE that have not been identified by NPS in this information and should be considered in the review in accordance with 36 CFR § 800.4.

Regarding the "initiation" of consultation, NPS has presented this project and its review a fait accompli with the location, design, identification of historic properties, assessment of effects, and proposed mitigation all prepared absent consultation with SHPOs, consulting parties, and the public. Section 106 of the NHPA and the review process outlined in 36 CFR Part 800 is intended to be consultative with the federal agency consulting and seeking input from SHPO/THPOs, consulting parties, and the public throughout the review of an undertaking to inform all steps of the Federal Agency decision making. **It is inconsistent with intent of the NHPA and contrary to 36 CFR Part 800 for this review to occur after all or a majority of the federal agency's decisions have been made and the project is planned for imminent start of construction.**

Per 36 CFR § 800.1 (c) the Federal Agency should ensure initiation of the process "early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process." **The plans included in Appendix A are marked "Released for construction" indicating a level of completeness that would preclude meaningful consideration of a broad range of alternatives and thoughtful consideration of ways to avoid or minimize effects in the design, appearance, or location of the undertaking.** While NPS acknowledges that additional identification and evaluation of effects could occur under the proposed draft PA, functionally the PA language would only facilitate minimal consideration of DHR, DC HPO, consulting party, and public comment on minor elements of the project that have not been finalized, primarily being utility infrastructure and minor design elements. The draft PA provides no meaningful mechanism to allow consultation to inform substantive design choices that would facilitate avoidance or minimization of adverse effects. **Consulting at this stage in the project and requesting comments on everything from the project design to proposed mitigation has precluded DHR's opportunity to provide comments that can inform decision making and does not constitute consultation in accordance with 36 CFR Part 800.**

The NPS has stated that proposed undertaking, the construction of a commemorative arch at Memorial Circle between the Lincoln Memorial and Arlington National Cemetery, will adversely affect numerous nationally significant historic properties. NPS has identified potential effects to at least six National Historic Landmarks (NHLs), including potential adverse effects to the Pentagon and Fort Myer Historic District in Virginia. While DHR has insufficient time to review in detail the completeness of NPS' identification of historic properties and assessment of effects to know if it is an accurate or whether additional effects are present, Section 110 of the NHPA (54 USC §306107) and 36 CFR 800.10 requires that the Federal Agency prior to the approval of a project "*to the maximum extent possible* undertake such planning and actions as may be necessary to minimize harm" to NHLs.

The standard set forth in the NHPA regarding NHLs, and the expectation under 36 CFR § 800.6 (a) for the consideration of alternatives to avoid and minimize adverse effects to historic properties, has clearly not been met. The draft programmatic agreement furthermore provides no substantive process that would allow for this standard to be met. The proposed further design review is unlikely to result in meaningful changes to the appearance of the arch that would avoid or minimize the existing known adverse effects that will occur.

NPS provided no meaningful consideration of alternatives that would minimize adverse effects to the maximum extent possible. The only alternative considered was different sizes/heights of the arch. No consideration was given to alternative commemorative designs that would be less visually heavy on the landscape (such as the originally proposed columns in the McMillan Plan). No consideration was given to alternative locations for the arch that would minimize adverse effects to the numerous historic properties identified. As a proposed monument to Our Nation's history, the proposed arch's design and location should have been developed with meaningful input from the public and consideration of the effects it will have on the landscape. **No consideration was given to a no-build alternative.** This is a commemorative work. Its construction is not vital or necessary. It does not serve a purpose or meet a need beyond commemoration and the administration's definition of "beautification." As currently designed, the arch's purported commemorative value is disruptive of and would adversely affect numerous other nationally significant commemorative spaces.

The historic resources that will be adversely affected by this project are nationally significant properties that honor critical times in Our Nation's history and memorialize the sacrifices made to protect this Nation. The proposed arch will result in an almost complete disruption of the visual dialogue between the Lincoln Memorial, Arlington National Cemetery, and Arlington House. This is an intentionally designed visual connection between the resting place for the soldiers who sacrificed their lives for the Union during the Civil War and Robert E. Lee's former home in Virginia with the memorial for the President who fought and ultimately died to keep this Country united across the Potomac River. This visual connection represents the restored Union, symbolically reuniting the North and the South. This arch truncates that ongoing connection. **Framing the view of Arlington House from the Lincoln Memorial through the Arch does not minimize this disruption; it injects an incongruous and conflicting imperialistic symbol into that space.**

The visual competitiveness of the design draws the eye away from and inserts a visually distracting new element into the views from the myriad other memorial spaces along the Potomac River, including, in Virginia, the George Washington Memorial Parkway and US Marine Corps War Memorial (at Arlington Ridge Park) as well as numerous memorial spaces within the District of Columbia. It is likely to introduce additional visual elements into numerous surrounding historic properties. **The project will introduce an intentionally visually disruptive arch on each of these carefully and thoughtfully designed and historic spaces and landscapes.**

These adverse effects are intentional and inherent in the design of the arch; it is intended to dominate the surrounding landscape. The purpose of its placement at the selected location (within the existing open space at

the intersection of the George Washington Memorial Parkway and the Arlington Memorial Bridge), its proposed size (more than twice the height of the Lincoln Memorial), and its design (a monolith in white marble with gilded statuary) are all intended to be visually overpowering, dwarfing surrounding monuments and visible from points across Virginia and the District.

The significance of the historic properties and their surrounding landscapes, some of Our Nation's most revered memorial spaces, combined with the severity of the adverse effects to these properties render the process and mitigation currently proposed in the draft Programmatic Agreement insufficient. Documentation of adversely affected historic properties, many of which have been extremely well documented, is largely unnecessary and inadequate mitigation. **Many of these effects, especially in Virginia to Arlington National Cemetery and Arlington House, are (1) un-minimizable, due to the proposed scope, scale, design, placement, and intentional prominence of the Arch, and (2) un-mitigatable in a manner that is commensurate with the severity and significance of the effects.**

DHR recommends that the NPS give more meaningful consideration to other alternatives that would result in substantial avoidance and minimization of adverse effects to these nationally significant historic properties. DHR recommends that the NPS consult with DHR, the DC Historic Preservation Office, consulting parties, and the public in accordance with the purpose and intent of Section 106 of the NHPA and 36 CFR Part 800. DHR does not agree to an expedited review of this undertaking pursuant to 36 CFR 800.3(g); as such DHR requests that NPS continue to identify and invite the participation of consulting parties, address any comments received thus far from consulting parties and the public, and consult regarding the scope of the identification efforts in accordance with 36 CFR 800.4 (a). All parties must be afforded sufficient time, in accordance with 36 CFR Part 800, to comment on each part of the review process.

Please contact Samantha Henderson, Director of the Review and Compliance Division at samantha.henderson@dhr.virginia.gov or (804) 482-6088 to continue consultation on this undertaking.

Sincerely,

Roger W. Kirchen
Director, Virginia Department of Historic Resources and
State Historic Preservation Officer

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June 15, 2026

Ms. Jessica Bowron, Acting Director
National Park Service
Main Interior Building
1849 C Street NW
Washington, D.C. 20240

RE: Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement

Dear Acting Director Bowron,

Thank you for the opportunity to comment on the proposed Triumphal Arch that would be built at the western terminus of Memorial Bridge. We are disappointed that The Cultural Landscape Foundation (TCLF), along with five other organizations, was not granted consulting party status as has been done for the current Section 106 reviews of the White House Visitor Center and Lafayette Park. TCLF, along with the National Trust for Historic Preservation, D.C. Preservation League, Committee of 100 on the Federal City, American Institute of Architects, and the National Parks Conservation Association each bring subject area expertise that could be helpful in addressing how to avoid, minimize, and mitigate the adverse effects detailed in Appendix D. Historic Properties and Assessment of Adverse Effects Tables. While the granting of consulting party status is at the discretion of the agency administering the review, in TCLF's near-thirty-year history such a request has never not been granted.

Indeed, it suggests proponents of the arch are afraid of hearing sound and reasoned opinions from subject area experts the agency has long included in previous Section 106 reviews. Moreover, as a former NPS employee who spent fifteen years as Coordinator of the Historic Landscape Initiative, I know how constructive consulting party input is and have seen in many, many cases where that input has made projects better. In addition, the Draft Programmatic Agreement for the Arch project states in the "Stipulations" section (1.B.1): "The Undertaking will be consistent with … the *Secretary of the Interior's Standards and Guidelines for the Treatment of Cultural Landscapes."* During my NPS tenure, I served as the primary author of the *Landscape Guidelines.*

At 250-feet-tall, the arch would be a significant addition to the Monumental Core, which stretches from the U.S. Capitol Grounds to Arlington National Cemetery, and includes the White House Grounds and the National Mall. The proposed arch interrupts and severs key visual and spatial relationships that are integral to the Monumental Core's design intent and its inherent symbolism, discussed below, and which have been stewarded by NPS for more than a century. This is acknowledged in the Assessment of Effects (AOE): "the undertaking meets the criteria of 36 CFR § 800.5(a)(1) because it would result in impacts to the integrity of historic properties through the alteration of character-defining visual and spatial relationships that contribute to their significance."

The AOE also states: "The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1) within the Area of Potential Effects because it would alter, directly and indirectly, characteristics of those properties that qualify them for inclusion in the National Register of Historic Places. As reflected in the table, the undertaking would have effects meeting the criteria of 36 CFR § 800.5(a)(1) that change integrity of setting, design, feeling, association, and, in some instances,

location by introducing visual, spatial, and physical changes that affect character-defining views, reciprocal vistas, circulation patterns, and designed landscape relationships."

Shockingly, in response to this overwhelming list of adverse effects, there is no credible attempt at avoidance. The construction of an arch at this scale and in this specific location is treated as *a fait accompli.* Moreover, the proposed minimization and mitigation efforts barely register as token gestures as their massive collective impact will do little to deter the extraordinary adverse effects that would result from this undertaking and unpin the spirit of the Section 106 consultation process.

The *Guidelines for the Treatment of Cultural Landscapes'* section on "Spatial Organization and Land Patterns" is clear about what is and is not recommended. **Recommended:** "Identifying, retaining and preserving the existing spatial organization and land patterns of the landscape as they have over time." ***Not* recommended:** "Allowing spatial organization and land patterns to be altered through incompatible development or neglect." A 250-foot-tall arch in Memorial Circle sited between the Lincoln Memorial and Arlington National Cemetery and Arlington House and in the Monumental Core is undeniably incompatible development.

In addition, the compressed timeframe for public comment—a mere ten days—is insufficient given the enormity of the project, the significance of the resources affected, and NPS' own catalogue of adverse effects.

Also of great concern is the lack of Congressional authorization to ensure compliance with the Commemorative Works Act (40 U.S.C. §§ 8901–8909), and the Height of Buildings Act (Pub. L. 61-196, 36 Stat. 452 (1910), as amended, Pub. L. 113-103, 128 Stat. 1152 (May 16, 2014)) and 40 U.S.C. § 8106.

The introduction of a monumental arch in Memorial Circle—and its impact on historic visual and spatial relationships—would create a terrible precedent and would radically alter more than a century of carefully orchestrated, and stewarded legacy of Internationally recognized landscape architecture, architecture, civic design, and art that contribute to the significance of the capital city's Monumental Core. There are two critical benchmarks in Washington, D.C.'s landscape legacy—Pierre L'Enfant's plan of 1791 and the McMillan Plan of 1902. The latter was devised by a distinguished group that included the landscape architect Frederick Law Olmsted, Jr.

Olmsted, Jr.'s impact on the development of the capital city is exceptional. Along with the McMillan Commission, he was a member of the first Commission of Fine Arts (CFA) in 1910, and served until 1918; he was the principal author of the Organic Act that created the National Park Service (which manages much of the city's Monumental Core), a member of the first National Capital Park Commission (1924-26) and National Capital Parks and Planning Commission (1926-32), both predecessors to the current commission, and the principal designer of the White House Grounds plan of 1935, which has guided work on those grounds for more than 90 years. The CFA's website notes: "Olmsted Jr.'s work of many decades on the National Mall created a unified spatial composition from a sequence of disconnected landscapes."

According to NPS' Cultural Landscape Report (CLR) of 1999 for the Lincoln Memorial and West Potomac Park**,** "Olmsted exercised a unique influence over the development of the Lincoln Memorial grounds, serving as arbiter of design decisions regarding all aspects of the treatment of the landscape." In addition, "Layout, spatial relationships, planting, and site features were often

conceived, shaped, and reviewed by the landscape architect member of the commission prior to approval by the full commission."

Visually connecting the Lincoln Memorial to Arlington National Cemetery is Memorial Bridge described in the National Register of Historic Places nomination (1980) as "Washington's most beautiful bridge"; it was designed by William Mitchell Kendall, a partner at the architectural firm McKim, Mead & White. Earlier bridge designs include one from 1886 by Paul Pelz that "featured Renaissance Revival Towers and articulated steel arches crossing the Potomac River," and competition winning design from 1899 by Edward Pearce Casey that included "Triumphal Arches on piers [that] emphasized an imperial architectural image" as noted in *Civic Art: A Centennial History of the U.S. Commission of Fine Arts* (p. 107).

Indeed, as part of the current campaign to get the proposed arch built, its proponents have circulated images of those aforementioned Memorial Bridge designs and others from the late nineteenth and early twentieth century that include arches and other tall vertical elements.

All those proposals were ultimately rejected. To argue that these proposals prove an arch was predestined is fallacious, at best. Similarly, the suggestion that L'Enfant called for the construction of one or more arches in the city is based on an inventive interpretation of a letter between L'Enfant and Thomas Jefferson in 1791. L'Enfant said no such thing.

According to NPS, the present Memorial Bridge was "Symbolically … designed to show the strength of a united nation by joining a memorial on the north side of the Potomac River (the Lincoln Memorial) with one on the south (Arlington House, the Robert E. Lee Memorial)." The architect envisioned an elaborate sculptural program … including seated figures of the first four American presidents on the D.C. side and reclining statues of oceans and river gods on Columbia Island. The bridge itself was to have forty allegorical statues." That entire sculptural program was eliminated by the CFA, as some statuary and pylons were seen as too tall in relation to the memorial.

The Lincoln Memorial is a hinge point (on a bent axis) visually connecting the Washington Monument and the Reflecting Pool to the east, and Arlington House. The Historic American Engineering Record report of 1988 about Arlington Memorial Bridge by historian Elizabeth Nolin noted: "As the final link in the chain of monuments which start at the Capitol building, the Arlington Memorial Bridge connects the Mall in Washington, D.C. with Arlington National Cemetery in Virginia. Designed to connect, both physically and symbolically, the North and the South, this bridge, as designed in the Neoclassical style, complements the other monumental buildings in Washington such as the White House, the Lincoln Memorial, and the Jefferson Memorial."

Some 110 years ago, Olmsted, Jr. wrote a letter to Secretary of War Newton D. Baker concerning the proposed Memorial Bridge design; his sage observations are apt today: **"The existing bridge design was the result of a competition held about 1899, before the Lincoln Memorial was even dreamed of…** [emphasis added]

"The bridge plans were carefully studied by members of the so-called Park Commission of 1900, of which I am the sole survivor. As a result of that study certain recommendations about them were made an essential part of our general plan. Among other things we said:

"Such modifications would call for the removal of the central ornamental towers, which would conflict with the proposed Lincoln Memorial."

"**These towers are the most conspicuous feature of the design and are so large and elaborate as to compete with the Lincoln Memorial** not only in an artistic sense but in point of cost. To eliminate them from the design would involve its complete restudy as an artistic problem. **Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part."** [emphasis added]

Washington, D.C. derives its significance from an unrivaled built legacy that has stood the test of time, thanks in large measure to the authenticity of the review processes of various commissions and governmental agencies that engage the public and subject experts as "consulting parties" offering a seat at the table in the Section 106 process. As the 2012 exhibition *Unbuilt Washington* at the National Building Museum noted, "The physical character of Washington, D.C., that we take for granted today is the unique result of countless decisions, debates, successes, failures, reconsiderations, missed opportunities, and lucky breaks."

Historically, the arch was never built and the cultural landscape in which it is being forced upon derives its significance from the high degree of integrity associated with its inherent visual and spatial relationships, which are a hallmark of its historic design that has been stewarded for multiple generations. *The Secretary of the Interior's Standards for Restoration* lists 10 standards including number ten: "Designs that were never executed historically will not be constructed." Shouldn't that foundational *Standard* be the starting point for any Section 106 conversation?

We hope that these comments along with the words and precedent of the principal author of the Organic Act and a founding CFA and NCPC commissioner who greatly influenced the overall design of the city offers decision makers in this case valuable insight and worthwhile guidance.

Feel free to contact me with any questions and thank you for your consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

Cc:
Jennifer Madello, Superintendent, George Washington Memorial Parkway, NPS
Tammy Stidham, Associate Regional Director, Lands & Planning, NPS
David Maloney, State Historic Preservation Officer, District of Columbia

June 15, 2026

Ms. Jennifer T. Nersesian, Regional Director
National Capital Region
National Park Service
1100 Ohio Drive, SW
Washington, DC 20024

RE: Initiation of Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle

Dear Ms. Nersesian:

Thank you for initiating consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the proposed Triumphal Arch in Memorial Circle. We have reviewed the project submittal and are writing to provide our initial comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

We understand that the National Park Service (NPS) proposes to use Federal funds to construct a new memorial within the District of Columbia that will celebrate the 250th anniversary of the founding of our nation. The approximately 250-foot-tall structure, which would be referred to as the Triumphal Arch, is proposed for Memorial Circle near the western terminus of Arlington Memorial Bridge, an area of extraordinary historic significance. Once complete, it would be the largest memorial arch in the world. It would also be the tallest and most visible memorial constructed in the District since completion of the Washington Monument. For these reasons, the effects of the proposed undertaking on historic properties should be carefully considered in accordance with the Section 106 regulations.

The NPS has requested our concurrence to expedite consultation by addressing multiple steps in the Section 106 process pursuant to 36 CFR 800.3(g). According to 36 CFR 800.2(a)(4), Federal agencies are to "plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement." Given the scale, visibility and effects of the proposed Federally funded monument on historic properties, the DC SHPO does not agree that expediting consultation is appropriate in this case.

However, we do concur with NPS's determination that this undertaking will adversely affect numerous historic properties and, as described in the Assessment of Effects (AOE) Report, the "most substantial" adverse effects will occur on those properties which "derive significance, in part, from their planned visual, commemorative, and spatial relationships across the Potomac River and through the monumental core." Within the District of Columbia, these adversely affected properties include the Memorial Avenue Corridor Cultural Landscape, Arlington Memorial Bridge, the Lady Bird Johnson Park Cultural Landscape, the Lincoln Memorial Cultural Landscape, the Lincoln Memorial, the National Mall Site, the National Mall Historic District, and the Mall Cultural Landscape. As documented in the AOE, other historic properties in DC will also be adversely affected. We anticipate providing further comments regarding additional adverse effects as consultation continues.

While DC SHPO's primary concerns center on the memorial's adverse effects, we also have significant, overarching concerns about how and why we are being requested to resolve those adverse effects at the onset of consultation rather than considering potential sites, reviewing conceptual designs and planning for Section 106 consultation as we normally do when consulting with the NPS regarding a new memorial. The following comments, which generally follow the order of the step-by-step process outlined in the regulations, address what we consider to be the deficiencies in the overall Section 106 review of this undertaking that brought us to this point.

As an initial matter, we are concerned that consultation for one of the largest memorials ever proposed in the District of Columbia did not commence "at the early stages of project planning" as required by 36 CFR 800.1(a). Since our receipt of the formal initiation letter on June 5, 2026, marked the first time the NPS contacted us about the project, it also appears that the requirement of 36 CFR 800.1(c) to "…ensure that the… process is initiated early… so that a broad range of alternatives may be considered" has not been met. Nor does it appear that the NPS's responsibility to consult with our office "… in a manner appropriate to the agency planning process...and to the nature of the undertaking and its effects on historic properties" as cited at 36 CFR 800.3(c)(3) has been fulfilled.

DC SHPO has reviewed the lists of consulting parties and "[o]ther parties that have requested consulting party status" in the initiation letter and supports giving consulting party status to both. Under 36 CFR 800.2(c)(5), "[c]ertain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties." The significant scope and effects of the undertaking mean that it will affect many interests, including those of the "[o]ther parties that have requested consulting party status." Based on these organizations' missions and their routine participation in Section 106 consultations for projects in the District, their demonstrated interest in the properties affected by the undertaking is clear. We strongly urge that they may be made consulting parties. Considering the scope of the undertaking, even this expanded list is likely missing necessary consulting parties. It should be evaluated to determine who else should be added.

Along with the consulting parties, the Section 106 regulations stress the importance of involving and considering the views of the public. CFR 800.2(d)(1) describes those views as "essential to informed Federal decision making in the Section 106 process" and public participation in this undertaking is especially important given how the arch would alter the character of our nation's capital and likely be of interest to individuals from all parts of the country. Yet it is our understanding that the public has been offered just 10 days to review the nearly 200 pages of related documentation and provide comments within this insufficient window of opportunity.

Given the visibility of the proposed monument from other areas of the city, the proposed Area of Potential Effect (APE) is drawn too narrowly, especially in areas of higher elevation. Further analysis to determine the visibility of the structure is necessary to determine and document the APE in accordance with 36 CFR 800.4(a).

When adverse effects are found, 36 CFR 800.6(a) requires Federal agencies to "…consult with the SHPO and other consulting parties…to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate…" those adverse effects. So fundamental is this requirement to the Section 106 process that 36 CFR 800.1(a) identifies it among the primary goals of consultation.

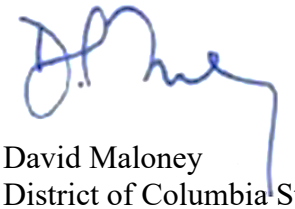
Avoidance efforts in typical Section 106 reviews of new memorials usually begin with the evaluation of a range of possible locations. Since a memorial honoring our country's 250th anniversary appears to have no relationship to Memorial Circle and would be inconsistent with Memorial Avenue's symbolic view corridor, the arch could conceivably be constructed at other locations. However, the AOE suggests no consideration was given to any other sites, including the two ceremonial gateways suggested by the U.S. Commission on Fine Arts (CFA) for additional memorials, specifically Pennsylvania Avenue, SE near the Sousa Bridge and South Capitol Street near the Douglass Bridge, or any of the sites identified in the National Capital Planning Commission's Memorials and Museums Master Plan. While a large memorial on these sites could result in adverse effects, all adverse effects are not equal. The "most substantial" adverse effects of the proposed site could be avoided if the arch were constructed in a location that did not significantly diminish the important reciprocal views that symbolize the reunification of the country after the Civil War or visually compete with the Lincoln Memorial.

When avoidance of adverse effects is not possible, minimization is usually sought via the review of an initial concept for a new memorial and subsequent design modifications. In this instance, the consulting parties have been presented with a fully developed, CFA approved design for a memorial arch. No opportunities for concept review or meaningful design review have been provided and the few design options characterized by the AOE as "various smaller arch heights" were dismissed before Section 106 was initiated. While the NPS suggests opportunities for design review of architectural detailing and materials will be provided, the essential size, scale and character of the memorial have already been established via CFA approval and the AOE states that the structure will be clad in granite. All the remaining design review options suggested by the NPS address mostly minor details that have no potential to minimize adverse effects in any meaningful way. Similarly, DC SHPO does not believe any of the mitigation measures suggested in the draft Programmatic Agreement will adequately resolve the adverse effects of the proposed project, and therefore does not concur in its use.

For all these reasons , we are concerned the DC SHPO's opportunities to reflect the interests of the District of Columbia and its citizens in the preservation of our cultural heritage in a manner that would meaningfully avoid, minimize, or mitigate the adverse effects of the undertaking have been precluded. Moreover, it appears that the Advisory Council on Historic Preservation's (ACHP) opportunity to comment may be foreclosed.

If you should have any questions or comments regarding any of these matters, please contact me at david.maloney@dc.gov or 202-442-8850 or Andrew Lewis at andrew.lewis@dc.gov or 202-442-8841.

Sincerely,



David Maloney
District of Columbia State Historic Preservation Officer

26-0593

cc: Consulting Parties

Outlook

Re: Proposed Triumphal Arch - Section 106 consultation meeting

From Smith, Kathryn G <Kathryn_Smith@nps.gov>
Date Mon 6/15/2026 5:54 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Campbell, Patrick <J_Patrick_Campbell@nps.gov>

Thank you for the opportunity to consult on the proposed Triumphal Arch project at Memorial Circle, part of the George Washington Memorial Parkway. As the NPS's Assessment of Effects report (AoE Report) notes, the height and location of the proposed arch mean it has the potential to adversely affect a number of National Historic Landmarks (NHLs) in Washington, DC and Arlington, Virginia. As you know, the National Historic Preservation Act (NHPA) provides heightened protection for designated NHLs through Section 110(f) (codified at 54 USC 306107) and the NHPA's implementing regulations at 36 CFR 800.10. Specifically, the NHPA requires that Federal agencies, to the maximum extent possible, undertake planning and actions necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking. This means that prior to the approval of any Federal undertaking that may affect a National Historic Landmark, the responsible Federal agency must notify the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior [duties delegated to the National Park Service, NHL Program or NPS-NHL] of the consultation and to invite both parties to consult if there may be an adverse effect on the NHL.

I have reviewed the material provided by NPS and the following comments and guidance are provided to assist the agency in complying with Section 110(f) of the NHPA (codified at 54 USC 306107).

1. Ten calendar days to review and provide substantive comments on this complex undertaking is insufficient.
2. The Assessment of Effects Report (AoE Report) does not include an analysis of alternate locations that were considered. This would be a key avoidance or minimization strategy.
3. The White House is an NHL, but it is not depicted on the APE maps or evaluated for adverse effects. The US Capitol, like the White House, is an NHL that is exempt from Section 106 review under 54 U.S.C. 307104, but it is included in the analysis. Please explain why.
4. Page 22 – Quarters 1, Fort Myer (NHL NRIS# 72001382) and Fort Myer Historic District (NHL NRIS# 72001380) - Please separate these and identify each one as an NHL. Also identify the Pentagon as an NHL (NHL NRIS# 89000932).
5. Page 23 - Viewshed and visual minimization – The discussion doesn't make clear what methods this might include. From my review of the project, it appears impossible to minimize this very large and visible project without relocating it or abandoning the arch design. Perhaps minimization should include ongoing design development that includes consideration of alternative designs and alternative

locations that would not cause the effects that have been identified in the AoE Report.

6. Thank you for providing the viewshed visualizations. It would be helpful to have visualizations from more locations, including from the NHLs. Providing views with leaf-off conditions would also be advisable.
7. TABLE 2: It appears you missed the "Observatory Hill Historic District" National Register listing (NRIS# SG100000479; Asset Detail). The nomination includes detailed information of views from the campus surrounding the Old Naval Observatory.
8. TABLE 3 - NHL Assessment of Effects:
    a. Pentagon - Agree with finding. The arch is likely to affect the viewsheds from the Pentagon's two ceremonial entrances on the north and east elevations. Additional visualizations might help confirm if the effects will be adverse.

    b. Fort Myer NHL District: Agree that the arch will likely be visible from the Fort Myer NHL district and has potential to cause adverse effects. The proposed Arch location is about 5,000 feet southeast of the flagpole at Whipple Field (adjacent to the NHL Fort Myer district) and about 200 feet lower in elevation. While there are intervening trees and the elevation change is significant (approx. 230 feet versus 30 feet), there is still possibility that the upper elements of the arch will be visible.

    Fort Myer NHL has no updated documentation. Its location on Arlington Heights is significant to its history. It was built as part of Civil War defenses before becoming Fort Myer. Views to the Potomac and over DC would have been important to its defensive mission.

    Sensitive location on the fort – the flagpole across from the senior officers' quarters that face Grant Ave. This is Whipple Field, former site of Fort Whipple during the Civil War. The location has a sweeping eastward/southeastward vista of the monumental core of DC, including the Wash Monument, Capitol dome, Post Office tower, Lincoln Memorial, Memorial Bridge, and Jefferson Memorial.

    Visual simulations of the arch from this area would help determine the extent and nature of the effects to the view.

    c. US Capitol Building– The viewshed simulation provided shows that the arch will be visible, but its distance from the NHL and its location off the main east-west axis along the Mall would minimize its prominence.

    d. Smithsonian Institution Building: Agree that there will be no adverse effect on this NHL.

    e. Georgetown NHL District: As a historic port town, its location on the river and views from the waterfront upriver and downriver are important. Agree that there will be no adverse effect to the NHL because of the distance, intervening landforms and vegetation, and the general visual clutter already present in the viewshed.

f. Old Naval Observatory NHL: The National Register nomination for Observatory Hill district [listed 1/12/2017; NRIS# 100000479] gives insights into the important views from this prominent location: “Written descriptions and images from the mid and late 19th century attest to the park-like character of Observatory Hill, suggesting that it was visited by the public for recreation and for the views it offered.” “the Observatory Hill district possesses a variety of features (Table 1) that give character to the cultural landscape: topography; land use; spatial organization; circulation; vegetation; small-scale features; and views and vistas”
    i. Views and Vistas
        1. Views to and from the National Mall - upper campus, Period: Old Naval Observatory, Contributing
        2. Views to and from Arlington National Cemetery – upper campus, Period: Old Naval Observatory, Contributing
        3. View to Georgetown –upper campus - Period: Old Naval Observatory, Contributing
        4. View to Lincoln Memorial – lower campus - Period: Hygienic Laboratory/NIH, Contributing
    ii. Observatory Hill National Register nomination, Page 7-41 - "Significant views that remain intact include those to the National Mall and West Potomac Park and to Arlington House and Arlington National Cemetery. As two prominent landmarks in the Washington landscape, the Naval Observatory and Arlington House have had a reciprocal relationship since the Observatory’s completion in 1844. Views from the Observatory to locations on the National Mall have been present since the nineteenth century, particularly views of the Washington Monument. The intended relationship between the Mall and the Observatory Grounds is evident in the 1902 McMillan Plan, which specifically mentions that the hill had an exceptionally beautiful view and depicted the area as a parkland extension of the Mall. Subsequent development of Observatory Hill and its surrounding area—most notably the addition of the U.S. Institute of Peace (completed in 2010) on the south slope of the hill—has somewhat obstructed views from the historic district. Nonetheless, it retains a visual relationship with the west end of the National Mall and West Potomac Park."

    "Views toward Observatory Hill were especially important during the nineteenth century when the Observatory provided local time service, dropping a ball down a pole mounted on the Observatory dome at noon each day. Most artists’ depictions of Observatory Hill focused on views from the river or across the river toward the Observatory, highlighting its prominence over the Potomac River and overlooking the city. The hill’s visibility diminished as the city grew, but the hill and the dome of the Observatory are still visible from the Potomac and from Arlington."
    • "Views and vistas from upper campus have been an important aspect of its landscape since before the construction of the Naval Observatory. These views exist because of the prominence of the hill in Washington’s topography. Although some of the views from the hill

present during the period of significance no longer exist, three notable views remain and are contributing to the district's historic landscape: the National Mall, including the Washington Monument and West Potomac Park; Arlington House and Arlington National Cemetery; and Memorial Bridge"

iii. The NHL boundary is much smaller than the full campus, so evaluation should be done regarding views outward from the Old Naval Observatory Building and its direct surroundings. Because of intervening later development, it may not have direct views towards Arlington National Cemetery anymore. Existing condition photos and visual simulations from the NHL would be helpful.

9. Programmatic Agreement Draft
    a. Stip. B – Codes & Standards – There is no Secretary of the Interior's Standard for new construction. There are Standards for the Treatment of Cultural Landscapes that address Rehabilitation. The Guidelines associated with the Rehabilitation Standard state that "When alterations to a cultural landscape are needed to assure its continued use, it is most important that such alterations do not radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials." Further, "The installation of additions to a cultural landscape may seem to be essential to the new use, but it is emphasized in the Rehabilitation guidelines that such new additions should be avoided, if possible, and considered *only* [original emphasis] after it is determined that those needs cannot be met by altering secondary, i.e., non-character-defining spatial organization and land patterns or features."
    b. It appears that continued design review stipulated in the document is unlikely to result in any substantive improvements to the adverse effects unless the location, size, and/or configuration of the arch can be changed. Mitigation will need to be substantial and will be difficult to define based on the extent and nature of the adverse effects.
    c. Viewshed and Visual Mitigation – the enumerated methods for minimization and mitigation for views are unlikely to have much effect except locally right next to the arch.

Thank you for the opportunity to provide assistance regarding the affected National Historic Landmarks.

Best,
Kathryn

Kathryn G. Smith
National Historic Landmarks Coordinator
Community Preservation Assistance Program Manager
National Park Service
National Capital Region
202.619.7180

202.913.3859 mobile

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Washington, DC 20242
kathryn_smith@nps.gov

NCR Website https://www.nps.gov/RESSNCR

NHL Website http://www.nps.gov/nhl
Facebook National Historic Landmark Program - NPS
Instagram NationalHistoricLandmarkNPS #NationalHistoricLandmark #FindYourPark

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From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Friday, June 12, 2026 11:18 AM
Subject: Proposed Triumphal Arch - Section 106 consultation meeting
When: Monday, June 15, 2026 1:00 PM-3:00 PM.
Where: Microsoft Teams Meeting

The National Park Service (NPS) is inviting you to participate as a consulting party in the review of a proposed undertaking pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800. The proposed undertaking involves construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. The NPS is the lead federal agency for this undertaking.

The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1). The undertaking would introduce a new permanent structure, associated hardscape, lighting, security elements, utility infrastructure, stormwater facilities, and traffic and pedestrian circulation changes into the Memorial Circle setting and would thereby alter characteristics of historic properties that qualify for inclusion in the National Register of Historic Places. In particular, the undertaking has the potential to impact the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and other related historic properties within the area of potential effects. The undertaking would also introduce new visual elements not presently found within Memorial Circle and change physical features within the setting that contributes to the significance of the historic district and cultural landscape.

Because of the phased nature of the undertaking, and because aspects of the project will continue to be refined during design development, the NPS has prepared a draft Programmatic Agreement (PA) to govern the resolution of adverse effects associated with the undertaking. The draft PA is intended to establish procedures for continued review, treatment, mitigation, and implementation as the project advances.

Enclosed link for your review are the following materials - https://parkplanning.nps.gov/triumphalarch

- Assessment of Effects
- Draft Programmatic Agreement

The NPS invites you to participate in a virtual consulting party meeting on June 15 from 1:00 p.m. to 3:00 p.m. Eastern Time. Meeting information will be provided separately. Additionally, these materials will be available for public review from June 5, 2026, to June 15, 2026.

Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Thank you for your consideration and participation in this consultation.

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

Microsoft Teams meeting

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United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

June 22, 2026

Mr. David Maloney
State Historic Preservation Officer
District of Columbia Historic Preservation Office
899 North Capitol Street, NE, Suite 7100
Washington, DC 20002

RE: Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle

Dear Mr. Maloney,

Thank you for providing the District of Columbia Historic Preservation Officer's (DC HPO's) comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 C.F.R. Part 800.

Public participation regarding the proposed Triumphal Arch has been extraordinary, with the NPS receiving over 100,000 public comments regarding this undertaking. Those views expressed are being considered in accordance with applicable laws and regulations. This level of participation indicates that those who wish to participate have indeed been able to do so. In your response to NPS's invitation to consult, you stated that the DC HPO "does not believe any mitigation measures suggested in the draft Programmatic Agreement will adequately resolve the adverse effects of the proposed project." The only mitigation measure so far suggested by the DC HPO is to site the project at an alternative location. Based on our previous communications, it is NPS's understanding that if the project consists of an approximately 250-foot-tall arch, located in Memorial Circle, it is the DC HPO's position that there is no way to mitigate or minimize the identified adverse effects. Please either confirm that this is indeed your position or propose any suggested mitigation measures that do not consist of either site relocation or diminution of the structure.

Thank you very much, and we look forward to your response. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Sincerely,

JENNIFER NERSESIAN
Digitally signed by JENNIFER NERSESIAN
Date: 2026.06.22 12:08:57 -04'00'

Jennifer T. Nersesian
Regional Director

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

June 22, 2026

Mr. Roger W. Kirchen
Director and State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, Virginia 23221

RE: Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle

Dear Mr. Kirchen,

Thank you for providing the Department of Historic Resources' (DHR's) comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 C.F.R. Part 800.

Public participation regarding the proposed Triumphal Arch has been extraordinary, with the NPS receiving over 100,000 public comments regarding this undertaking. Those views expressed are being considered in accordance with applicable laws and regulations. This level of participation indicates that all who wish to participate have indeed been able to do so. In your response to NPS's invitation to consult, you stated that the DHR believes many of the proposed undertaking's effects on historic properties "are (1) un-minimizable, due to the proposed scope, scale, design, placement, and intentional prominence of the Arch, and (2) un-mitigatable in a manner that is commensurate with the severity and significance of the effects." It is NPS's understanding that if the project consists of an approximately 250-foot-tall arch, located in Memorial Circle, it is the DHR's position that there is no way to mitigate or minimize the identified adverse effects. Please either confirm that this is indeed your position or propose any suggested mitigation measures that do not consist of either site relocation or diminution of the structure.

Thank you very much, and we look forward to your response. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Sincerely,

JENNIFER NERSESIAN Digitally signed by JENNIFER NERSESIAN
Date: 2026.06.22 12:09:37 -04'00'

Jennifer T. Nersesian
Regional Director

Outlook

Fw: [EXTERNAL] Clarification for the record

From Stidham, Tammy <Tammy_Stidham@nps.gov>
Date Thu 02-Jul-26 11:19 AM
To Hoaglund, Jordan W <jordan_hoaglund@nps.gov>; Gillham, Lindsay B <Lindsay_Gillham@nps.gov>; Levine, Haninah <haninah.levine@sol.doi.gov>

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

From: Maloney, David (OP) <david.maloney@dc.gov>
Sent: Thursday, 02 July 2026 12:37:22
To: Stidham, Tammy <Tammy_Stidham@nps.gov>
Subject: [EXTERNAL] Clarification for the record

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello, Tammy. I wanted to forward this statement to you for the sake of clarity and completeness.

In my June 26, 2026 letter to you, I discussed the need in the Section 106 review process to consider ways to avoid the adverse historic effects of locating the proposed monumental arch at Memorial Circle. In that context, I mentioned the South Capitol Street oval, which the Chairman of the Commission of Fine Arts had raised as a potential location for an arch, as an alternative to consider. Since then, I have received questions about the potential of constructing an arch at the South Capitol Street oval and want to clarify why it was raised. I mentioned the potential of this alternative location to emphasize the need to consider ways to avoid the adverse historic effects as part of the Section 106 process. This was not an endorsement of locating an arch at this location, which would raise other issues that have not been evaluated. Finally, as is the case with all comments I make in the Section 106 process, the letter reflected my views as the District's State Historic Preservation Officer and is not intended to speak for the larger District government.

Thanks,
David

David Maloney (he/him/his)
State Historic Preservation Officer • DC Office of Planning
899 North Capitol Street NE, Suite 7100 • Washington, DC 20002
202-442-8850
david.maloney@dc.gov
planning.dc.gov

Telework Day: Tuesdays. I can still be reached via email and phone during these days.
Sign up here for OP's newsletter and announcements

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

July 10, 2026

Mr. David Maloney
District of Columbia Historic Preservation Office
District of Columbia Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Re: Continued Consultation under Section 106 of the National Historic Preservation Act for the Proposed Triumphal Arch at Memorial Circle, Washington, DC

Dear Mr. Maloney:

Thank you for providing the District of Columbia State Historic Preservation Officer's (DC HPO) letters dated June 15, 2026, and June 26, 2026. The National Park Service (NPS) is pleased to know DC HPO is meaningfully participating in the review process required by the National Historic Preservation Act (NHPA) and its implementing regulations at 36 C.F.R. Part 800 for this undertaking. Due to NPS's extraordinary transparency at the outset of this review process, DC HPO was able to prepare substantial initial comments regarding the undertaking. Notably, it is clear through your letters that DC HPO agrees the proposed action is an undertaking, as defined in 36 C.F.R. § 800.16(y), that has the potential to cause effects on historic properties.

NPS considered DC HPO's request that it grant consulting party status to those who requested such status. NPS is pleased to inform you that DC HPO's input has been incorporated into this review process. Accordingly, NPS has granted consulting party status to the following groups:

- National Trust for Historic Preservation
- Committee of 100 on the Federal City
- DC Preservation League
- The Cultural Landscape Foundation
- National Parks Conservation Association
- American Institute of Architects
- National Mall Coalition
- Family Circle of Descendants at Arlington House

Based on the Virginia Department of Historic Resources's suggestions, NPS has also granted consulting party status to:

- Preservation Virginia
- Virginia Museum of History and Culture
- Arlington Historical Society
- Friends of Joint Base Myer-Henderson Hall
- Pentagon Memorial Foundation
- Virginia Secretary of Veterans and Defense Affairs
- Virginia Department of Veterans Services
- Veterans of Foreign Wars – National Organization
- The American Legion – National Organization

Further, NPS noted DC HPO's concern with the length of the initial public comment period provided for this undertaking. While NPS did receive over 100,000 comments during this initial comment period, NPS incorporated DC HPO's views and reopened public comment for twenty additional days on July 10, 2026.

NPS is now seeking DC HPO's views regarding the area of potential effects (APE) and the historic properties located therein for this proposed undertaking. NPS provided DC HPO, consulting parties, and the public with its initial APE determination on June 5, 2026. However, DC HPO believes the APE was "drawn too narrowly, especially in areas of higher elevation." DC HPO provided that "[f]urther analysis to determine the visibility of the structure is necessary to determine and document the APE in accordance with 36 C.F.R. [§] 800.4(a)."

The Section 106 regulations define an APE as "the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking" (36 CFR § 800.16[d]). The APE is defined to allow for the evaluation of potential effects to historic properties resulting from an undertaking.

To begin developing the APE for this project, the NPS referenced the APEs developed for other recent federal undertakings that involved major construction and physical prominence in the Potomac River basin, including the rehabilitation of the Arlington Memorial Bridge, the Rehabilitation of the Lincoln Memorial, the rehabilitation of the Tidal Basin and West Potomac Park seawalls, and the Long Bridge Project. Reviewing the APE development and consultation process for these prior projects informed the drafting of the initial APE for this project by identifying considerations and analysis raised in prior efforts that are germane to the current proposed undertaking. Additionally, it allowed the NPS to consider consulting party input on those prior APEs that may also be relevant to the APE of this project.

To establish preliminary boundaries for the APE, aerial imagery basemaps in ArcGIS Pro and Google Earth were used to identify the general extents of potential construction and visual impacts. To inform the outer boundaries of the preliminary APE and identify critical study areas within it, the NPS analyzed photographs of important viewsheds, as well as architectural landscape renderings developed by the project's designers that overlay the proposed undertaking on those viewsheds. This analysis of APE outer extents considered areas of higher elevation (from which views would be more likely); major urban infrastructure (particularly elevated structures that would have a greater potential to block views); and other urban conditions like building density, street patterns, tree coverage, and potential viewsheds.

The NPS then used existing cultural resources GIS tools to identify, map, and list cultural resources within the APE. The NPS consulted data from the Cultural Resources Inventory System (CRIS), the Virginia Cultural Resources Inventory System (VCRIS), and the National Register Information System including nomination documentation held at the National Archives. Once the APE was drafted, the impacted resources were gathered using a selection-by-location tool in ArcGIS Pro. This geoprocessing tool allows a user to select resources from one set of layers (in this case the data layers containing data for the National Register, National Historic Landmark, CRIS-CL, and CRIS-HS programs) using a defined spatial limit (in this case the preliminary boundary for the APE).

The APE for this project encompasses the area in which the NPS anticipates that direct and/or indirect effects to historic properties are possible. Within the overall APE, the NPS has identified an "area of direct effects." This area includes the immediate proposed construction footprint, directly adjacent areas, and the primary ceremonial axis linking the Washington D.C. monumental core with Arlington National Cemetery.

The area of direct effects extends from Arlington National Cemetery in the west, across the Memorial Avenue Corridor to the Lincoln Memorial, and then along the length of the National Mall to the United States Capitol. In addition to those axial landscapes, it also includes adjacent and cultural landscapes including, generally from west to east: Arlington House, the Robert E. Lee Memorial, the entirety of the Memorial Avenue Corridor, Lady Bird Johnson Park, portions of Mount Vernon Memorial Highway, portions of the George Washington Memorial Parkway, the southern entrance of Rock Creek and Potomac Parkway, the Washington Monument and grounds, and the United States Capitol and grounds.

Beyond the area of direct effects, the APE extends farther to include places that are not expected to be directly affected by the undertaking but are potentially subject to indirect effects (the area of indirect effects). The outer bounds of the APE encompass Joint Base Myer–Henderson Hall to the west and from there, the boundary extends to the east to surround Arlington National Cemetery and Arlington Ridge Park. The boundary turns north before it reaches the bank of the Potomac River and parallels the riverbank upriver to a point north of Rosslyn. The boundary then crosses the river and encompasses the Georgetown Waterfront, continuing to the east to include

the southern entrance of the Rock Creek and Potomac Parkway and the Lincoln Memorial and grounds. From the Lincoln Memorial, the boundary generally follows the northern side of the National Mall—with a jog northward to include the Old Post Office Tower—to the U.S. Capitol and Grounds, which mark the eastern end of the APE. From this eastern terminus, the APE boundary generally follows the southern side of the National Mall, extending in a line to the west until 15th Street SW, where it turns to the south to include the bridges from the waterfront to Hains Point. The boundary then extends southwest across the Potomac to a point north of Ronald Reagan Washington National Airport and there turns westward to encompass the Pentagon and curve north to surround Arlington National Cemetery, up to Joint Base Myer–Henderson Hall.

Additionally, NPS publicly provided details of the historic properties within the area of direct effects in Table 1 of Appendix D and details of the historic properties within the area of indirect effects in Table 2 of Appendix D. These tables include a listing of historic districts, cultural landscapes, and archeological sites within the APE, as well as contributing features and elements within them. These tables also detail the designation of the properties.

As DC HPO will note, as provided above, NPS considered "areas of higher elevation (from which views would be more likely)" and "major urban infrastructure (particularly elevated structures that would have a greater potential to block views)" when defining the APE. Such considerations were of main concern to DC HPO in its June 15, 2026, letter. NPS believes this information is more than sufficient for DC HPO to provide additional input as to what should be the APE and to identify the historic properties located within the APE. As such, NPS requests DC HPO provide its preferred APE and identify historic properties located within which DC HPO believes to be sufficient for this undertaking.

Please provide your response to the above by July 19, 2026.

Sincerely,

Frank Lands
Deputy Director, Operations
National Park Service

For

Jennifer T. Nersesian
Regional Director
National Capital Region
National Park Service

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

July 10, 2026

Mr. Roger Kirchen
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Continuation of Consultation under Section 106 of the National Historic Preservation Act for the Proposed Triumphal Arch at Memorial Circle, Washington, DC

Dear Mr. Kirchen:

Thank you for providing the Virginia Department of Historic Resources's (VDHR) letters dated June 15, 2026, and July 2, 2026. The National Park Service (NPS) is pleased to know VDHR is meaningfully participating in the review process required by the National Historic Preservation Act (NHPA) and its implementing regulations at 36 C.F.R. Part 800 for this undertaking. Due to NPS's extraordinary transparency at the outset of this review process, VDHR was able to prepare substantial initial comments regarding the undertaking. Notably, it is clear through your letters that VDHR agrees the proposed action is an undertaking, as defined in 36 C.F.R. § 800.16(y), that has the potential to cause effects on historic properties.

NPS considered VDHR's request to grant consulting party status to additional groups who may have concerns with the undertaking's effects on historic properties. NPS is pleased to inform you that VDHR's input has been incorporated into this review process. Accordingly, NPS has granted consulting party status to the following groups:

- Preservation Virginia
- Virginia Museum of History and Culture
- Arlington Historical Society
- Friends of Joint Base Myer-Henderson Hall
- Pentagon Memorial Foundation
- Virginia Secretary of Veterans and Defense Affairs
- Virginia Department of Veterans Services
- Veterans of Foreign Wars – National Organization

- The American Legion – National Organization

Additionally, NPS has also granted consulting party status to:

- National Trust for Historic Preservation
- Committee of 100 on the Federal City
- DC Preservation League
- The Cultural Landscape Foundation
- National Parks Conservation Association
- American Institute of Architects
- National Mall Coalition
- Family Circle of Descendants at Arlington House

Further, NPS noted VDHR's concern with the length of the initial public comment period provided for this undertaking. While NPS did receive over 100,000 comments during this initial comment period, NPS incorporated VDHR's views and reopened public comment for twenty additional days on July 10, 2026.

NPS is now seeking VDHR's views regarding the area of potential effects (APE) and the historic properties located therein for this proposed undertaking. NPS provided VDHR, consulting parties, and the public with its initial APE determination on June 5, 2026. However, VDHR believes the APE is "incomplete." VDHR requested "information in order to assess the appropriateness of the APE." Specifically, VDHR suggested a "viewshed study should be included" in supporting documentation of the APE determination.

The Section 106 regulations define an APE as "the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking" (36 CFR § 800.16[d]). The APE is defined to allow for the evaluation of potential effects to historic properties resulting from an undertaking.

To begin developing the APE for this project, the NPS referenced the APEs developed for other recent federal undertakings that involved major construction and physical prominence in the Potomac River basin, including the rehabilitation of the Arlington Memorial Bridge, the Rehabilitation of the Lincoln Memorial, the rehabilitation of the Tidal Basin and West Potomac Park seawalls, and the Long Bridge Project. Reviewing the APE development and consultation process for these prior projects informed the drafting of the initial APE for this project by identifying considerations and analysis raised in prior efforts that are germane to the current proposed undertaking. Additionally, it allowed the NPS to consider consulting party input on those prior APEs that may also be relevant to the APE of this project.

To establish preliminary boundaries for the APE, aerial imagery basemaps in ArcGIS Pro and Google Earth were used to identify the general extents of potential construction and visual impacts. To inform the outer boundaries of the preliminary APE and identify critical study areas within it, the NPS analyzed photographs of important viewsheds, as well as architectural landscape renderings developed by the project's designers that overlay the proposed undertaking on those viewsheds. This analysis of APE outer extents considered areas of higher elevation (from which views would be more likely); major urban infrastructure (particularly elevated structures that would have a greater potential to block views); and other urban conditions like building density, street patterns, tree coverage, and potential viewsheds.

The NPS then used existing cultural resources GIS tools to identify, map, and list cultural resources within the APE. The NPS consulted data from the Cultural Resources Inventory System (CRIS), the Virginia Cultural Resources Inventory System (VCRIS), and the National Register Information System including nomination documentation held at the National Archives. Once the APE was drafted, the impacted resources were gathered using a selection-by-location tool in ArcGIS Pro. This geoprocessing tool allows a user to select resources from one set of layers (in this case the data layers containing data for the National Register, National Historic Landmark, CRIS-CL, and CRIS-HS programs) using a defined spatial limit (in this case the preliminary boundary for the APE).

The APE for this project encompasses the area in which the NPS anticipates that direct and/or indirect effects to historic properties are possible. Within the overall APE, the NPS has identified an "area of direct effects." This area includes the immediate proposed construction footprint, directly adjacent areas, and the primary ceremonial axis linking the Washington D.C. monumental core with Arlington National Cemetery.

The area of direct effects extends from Arlington National Cemetery in the west, across the Memorial Avenue Corridor to the Lincoln Memorial, and then along the length of the National Mall to the United States Capitol. In addition to those axial landscapes, it also includes adjacent and cultural landscapes including, generally from west to east: Arlington House, the Robert E. Lee Memorial, the entirety of the Memorial Avenue Corridor, Lady Bird Johnson Park, portions of Mount Vernon Memorial Highway, portions of the George Washington Memorial Parkway, the southern entrance of Rock Creek and Potomac Parkway, the Washington Monument and grounds, and the United States Capitol and grounds.

Beyond the area of direct effects, the APE extends farther to include places that are not expected to be directly affected by the undertaking but are potentially subject to indirect effects (the area of indirect effects). The outer bounds of the APE encompass Joint Base Myer–Henderson Hall to the west and from there, the boundary extends to the east to surround Arlington National Cemetery and Arlington Ridge Park. The boundary turns north before it reaches the bank of the Potomac River and parallels the riverbank upriver to a point north of Rosslyn. The boundary then crosses the river and encompasses the Georgetown Waterfront, continuing to the east to include

the southern entrance of the Rock Creek and Potomac Parkway and the Lincoln Memorial and grounds. From the Lincoln Memorial, the boundary generally follows the northern side of the National Mall—with a jog northward to include the Old Post Office Tower—to the U.S. Capitol and Grounds, which mark the eastern end of the APE. From this eastern terminus, the APE boundary generally follows the southern side of the National Mall, extending in a line to the west until 15th Street SW, where it turns to the south to include the bridges from the waterfront to Hains Point. The boundary then extends southwest across the Potomac to a point north of Ronald Reagan Washington National Airport and there turns westward to encompass the Pentagon and curve north to surround Arlington National Cemetery, up to Joint Base Myer–Henderson Hall.

Additionally, NPS publicly provided details of the historic properties within the area of direct effects in Table 1 of Appendix D and details of the historic properties within the area of indirect effects in Table 2 of Appendix D. These tables include a listing of historic districts, cultural landscapes, and archeological sites within the APE, as well as contributing features and elements within them. These tables also detail the designation of the properties. Further, Appendix A provided VDHR with viewshed impact renderings from multiple locations within the APE, which was of main concern by VDHR in its June 15, 2026, letter.

NPS believes this information is more than sufficient for VDHR to provide additional input as to what should be the APE and to identify the historic properties located within the APE. As such, NPS requests VDHR provide its preferred APE and identify historic properties located within which VDHR believes to be sufficient for this undertaking.

Please provide your response to the above by July 19, 2026.

Sincerely,

Frank Lands
Deputy Director, Operations
National Park Service

For

Jennifer T. Nersesian
Regional Director
National Capital Region
National Park Service

DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
Neighborhood Services Division – Historic Preservation Program
2100 Clarendon Boulevard, Suite 700, Arlington, VA 22201
TEL 703.228.3830 www.arlingtonva.us

Memorandum

To: Tammy Stidham, Associate Regional Director, National Park Service (NPS)

Date: July 16, 2026

From: Mical Durak, Historic Preservation Program (HPP), CPHD

Subject: HPP Feedback on Concerns to Historic Properties in the Area and Potential Effects on Those Resources

Thank you for reaching out to seek further information about historic properties in the area near the proposed undertaking and the potential effects of the project on those properties. Please see below for Arlington County's Historic Preservation Program's (HPP) comments:

Feedback on Area of Potential Effects and Identified Historic Resources:

- HPP staff concur with the National Park Service's (NPS) list of 43 identified historic resources (both within area of direct effects and indirect effects) as outlined in *Appendix D: Historic Properties and Assessment of Adverse Effects Tables* (attached) which was shared with Consulting Parties in June 2026.
- However, HPP staff disagree with NPS's assessment of the adverse effect on some of those properties. For example, the Lyndon B. Johnson Memorial Grove is located close and within visual range of the proposed undertaking making it more likely that the "proposed undertaking *would* result in adverse indirect effects" rather than the stated "may." Other examples include, but are not limited to, the World War II Memorial, Thomas Jefferson Memorial, and Theodore Roosevelt Island for which the assessment of effect as "no adverse effect is anticipated" should be re-assessed by NPS. We encourage NPS to comprehensively re-assess listed resources and their potential to be affected, including visually, atmospherically, or consequentially, by the proposed undertaking.
- HPP staff agree with NPS's assessment that additional archaeological studies must occur prior to excavation and construction. NPS identified 44AX0028 (Alexandria Canal) in their Assessment of Effect (AoE); however, according to the Virginia Cultural Resource Information System (V-CRIS), there are 13 other known archaeological sites within NPS's current APE boundary for the project: 44AR0008, 44AR0017, 44AR0032, 44AR0036, 44AR0043, 44AR0045, 44AR0046, 44AR0047, 44AR0048, 44AR0049, 44AR0050, 44AR0057, and 44AR0058. Known archaeological resources within the Area of Potential Effects (APE) in Washington, D.C., would also need to be identified. Furthermore, NPS needs to identify how all those resources would be affected by this undertaking as they were not included in the initial assessment.

- HPP staff strongly recommend that NPS expand the APE, especially the area of potential indirect effects. The height of this proposed undertaking makes it more likely to have a visual effect on surrounding resources at higher elevations in Arlington. HPP staff are concerned that the potential indirect or consequential effect on nearby historic neighborhoods, several of which are listed on the National Register of Historic Places (NRHP) or contain NRHP-listed, NRHP-eligible, or locally significant historic resources, have not been properly studied or evaluated. Some of the nearby neighborhoods include Rosslyn, Radnor/Fort Myer Heights, Clarendon-Courthouse, Lyon Park, Penrose, Foxcroft Heights, and Arlington View.
    - Additionally, NPS's use of recent federal undertakings involving "major construction and physical prominence in the Potomac River basin" as a reference point to help develop the existing APE is understandable; however, a majority of those projects were for the rehabilitation of existing structures – not for the construction of a tall and visually prominent structure and thus, given the scale and design, require further consideration.
- Finally, HPP staff request that the project team develop additional viewshed studies with a vantage point from Arlington County. Such studies would serve as a necessary assessment to understand the concern HPP staff have about the potential visual impact on nearby historic resources/neighborhoods in Arlington County (beyond the Arlington National Cemetery).

In conclusion, HPP staff would like to reiterate that the requested deadline for comments on this specific topic does not follow standard protocols and has impacted our ability to provide a comprehensive response. As with the initial engagement with consulting parties for this project, for which there was a 10-day review period, it does not follow the standard Section 106 process. Furthermore, requesting that consulting parties identify historic properties in the area near the potential undertaking and share "thoughts on issues related to the potential undertaking's effects on such historic properties" also strays from the standard Section 106 process. NPS had already developed their AoE; therefore, we require further clarity as to exactly what NPS is requesting of Arlington County as a consulting party.

Again, we respectfully request that a proposed Section 106 timeline be shared with all consulting parties and that there be future consulting party meetings held on this topic. We welcome future opportunities to meaningfully engage in the Section 106 process for this undertaking in the future.

Mical Durak

Mical Durak
Historic Preservation Principal Planner

Outlook

RE: [EXTERNAL] RE: Invitation to participate in consultation - Proposed Triumphal Arch

From Koeppel, Sarah Y CTR WHS FSD (USA) <sarah.y.koeppel.ctr@mail.mil>
Date Thu 7/16/2026 8:01 AM
To Hoaglund, Jordan W <jordan_hoaglund@nps.gov>
Cc Stidham, Tammy <Tammy_Stidham@nps.gov>; Kloehn, Ariam C CIV WHS FSD (USA) <ariam.c.kloehn.civ@mail.mil>; Miranda, Rafael A CAPT USN COMNAVFACSYSCOM (USA) <rafael.a.miranda.mil@us.navy.mil>; Rogers, Emilie A CIV WHS FSD (USA) <emilie.a.rogers.civ@mail.mil>; Keethler, Emma C CTR (USA) <emma.c.keethler2.ctr@mail.mil>; King, Joseph W III CIV WHS FSD (USA) <joseph.w.king78.civ@mail.mil>

Thanks so much, Jordan. I am the correct POC but unfortunately didn't receive the June 5th email. If the opportunity is still available, we do request to participate in this Section 106 review as a consulting party. Please let us know if we may be designated as such and advise on any necessary next steps to join the consultation process.

Regarding your July 10 email, WHS notes that the NPS has already evaluated the potential effects to the Pentagon Historic District in its June 2026 Environmental Assessment. Therefore, we have no further comments or additional information to provide beyond that existing evaluation at this time.

Thanks so much,
Sarah

Sarah Koeppel, RPA
Deputy Federal Preservation Officer
(Contractor), Eastern Research Group, Inc.
Facilities Services Directorate (FSD)
Washington Headquarters Services (WHS)
M: (301) 606-3628
NIPR: sarah.y.koeppel.ctr@mail.mil
https://www.whs.mil

From: Hoaglund, Jordan W <jordan_hoaglund@nps.gov>
Sent: Monday, July 13, 2026 2:52 PM
To: Koeppel, Sarah Y CTR WHS FSD (USA) <sarah.y.koeppel.ctr@mail.mil>
Cc: Stidham, Tammy <Tammy_Stidham@nps.gov>; Kloehn, Ariam C CIV WHS FSD (USA) <ariam.c.kloehn.civ@mail.mil>; Miranda, Rafael A CAPT USN COMNAVFACSYSCOM (USA) <rafael.a.miranda.mil@us.navy.mil>
Subject: Re: [EXTERNAL] RE: Invitation to participate in consultation - Proposed Triumphal Arch

You don't often get email from jordan_hoaglund@nps.gov. Learn why this is important

Hi Sarah - I checked with Tammy (cc'd) who sent the original invitation on June 5 and it looks like we had you as the contact back then as well. Let us know if it needs to go to someone else. Also copying Capt. Rafi Miranda who has been helping our team with coordination across DoW.

Thanks!

Jordan Hoaglund
National Park Service
Priority Project Coordinator (Detail)
Washington Support Office
1849 C Street; Room 3321
Washington, DC 20240
Cell: 303-565-6796

Please see my Shared Calendar for specific availability.

From: Koeppel, Sarah Y CTR WHS FSD (USA) <sarah.y.koeppel.ctr@mail.mil>
Sent: Monday, July 13, 2026 11:02 AM
To: Hoaglund, Jordan W <jordan_hoaglund@nps.gov>
Cc: Stidham, Tammy <Tammy_Stidham@nps.gov>; Kloehn, Ariam C CIV WHS FSD (USA) <ariam.c.kloehn.civ@mail.mil>
Subject: [EXTERNAL] RE: Invitation to participate in consultation - Proposed Triumphal Arch

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The Committee of 100
on the Federal City

945 G Street, N.W., Washington, D.C. 20001 ◆ www.committeeof100.net ◆ info@committeeof100.net

July 17, 2026

Ms. Tammy Stidham
Associate Regional Director – Lands & Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

By email: tammy_stidham@nps.gov

Dear Ms. Stidham:

On behalf of the Committee of 100 on the Federal City ("Committee of 100"), I am writing in response to the invitation by Jordan W. Hoagland (email received July 10, 2026) to the Committee of 100 to participate as a Consulting Party pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800, with respect to a proposed undertaking involving construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. (the "Arch Proposal"). The NPS is the lead federal agency for this undertaking.

Mr. Hoagland's email asks the Committee of 100 to provide "knowledge of, or concerns with, historic properties in the area near the potential undertaking, and your thoughts on issues related to the potential undertaking's effects on such historic properties." The invitation requests that we provide any information for NPS to consider by Sunday, July 19, 2026.

The Committee of 100 accepts the NPS's invitation to participate as a Consulting Party in this matter. Our views follow.

1. As a preliminary matter, we strongly object to the rushed timeframe and perfunctory process that NPS has chosen to conduct its review and consultation responsibilities under the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA). This rushed process is particularly inappropriate and improper for a massive new structure in the monumental core of Washington, D.C. that would have such profound and adverse effects to significant and carefully planned historic structures and cultural landscapes in the Nation's Capital. As the regulations state:

   > "The agency official should use appropriate mechanisms, taking into account the magnitude of the undertaking and the nature of its effects upon historic properties, the likely effects on historic properties, and the relationship of the Federal involvement to the undertaking to ensure that the public's views are considered in the consultation. The agency official should also consider the extent of notice and information concerning historic preservation issues afforded the public at earlier steps in the section 106 process to determine the appropriate level of public involvement when resolving adverse effects so that the standards of § 800.2(d) are met." 36 C.F.R. § 800.6(a)(4) (emphasis added).

   Here, given the magnitude of the Arch Proposal, NPS has an obligation to carry out the Section 106 consultation process in a manner that provides a meaningful opportunity for consideration

of the public's views, particularly regarding alternatives. Considering the considerable public interest in this project (and the very short comment opportunity offered for public comment, i.e. June 5-15, 2026, only six working days), we request that NPS share with the Consulting Parties all public comments received to date regarding the proposal, and provide NPS's analysis and response to the views of the public. Without this, we question whether NPS has met its obligation "to ensure that the public's views are considered in the consultation," as required by 36 C.F.R. § 800.6(a)(4).

2. With respect to the Arch Proposal's adverse effects on historic properties, we have previously stated our view to NPS that the Arch Project would have significant adverse effects on historic properties within the Area of Potential Effects. In fact, those impacts would seriously damage the cultural landscapes that help to define the character of the Nation's Capital. For a more detailed explanation of our views with respect to adverse effects, please see the detailed set of comments addressed to you dated June 15, 2026 (copy attached).

3. More fundamentally, however, the question that NPS should be addressing at this point is not whether the Arch Proposal would adversely affect existing historic properties, since those adverse effects on historic sites and cultural landscapes of the highest order have been well documented (and even acknowledged by NPS). Instead, the question that NPS should be addressing at this point is what alternatives or modifications could be applied to the undertaking to avoid, minimize or mitigate those adverse effects. As the applicable regulations expressly state:

   > "The agency official shall consult with the SHPO/THPO and other consulting parties . . . <u>to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties.</u>" 36 CFR § 800.6(a) (emphasis added).

   Despite this obligation to confer with the Consulting Parties regarding project alternatives, NPS has effectively ruled out any meaningful opportunity to consult on the key topic of project alternatives—particularly alternative locations and height—that would avoid the adverse effects of the current proposal in their entirety. To the contrary, NPS, in its "Assessment of Effects Report," has made it clear that it intends to limit consideration of alternatives solely to minor design changes to a massive 250-foot structure that would forever alter the existing cultural landscape.

   It is the view of the Committee of 100 that the Assessment of Effects Report is seriously flawed by foreclosing appropriate consideration of project alternatives, and should be withdrawn. Indeed, the NPS should halt further consideration of this proposal unless and until it has seriously explored project alternatives in consultation with the Consulting Parties as required under 36 CFR § 800.6(a), and through a process appropriate to the magnitude of the Arch Proposal as required by 36 CFR § 800.6(a)(4). To that end, we request that NPS, as lead agency, initiate a meaningful consultation process to follow up on the suggestion made by the DC State Historic Preservation Officer (DC SHPO), and confer with the various Consulting Parties regarding alternative locations such as near the Douglass Bridge, or any of the sites identified in the National Capital Planning Commission's Memorials and Museums Master Plan.

4. We note that NPS, as the lead agency under the NHPA, is required to "ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis." 36 CFR § 800.11. We request that NPS provide the basis under which it has made findings regarding its

evaluation of project alternatives under 36 CFR § 800.6, and specifically its apparent determination that alternative project locations should be excluded.

5. It is also the view of the Committee of 100 that the NPS's review of the project under NEPA is procedurally and substantially defective. The Environmental Assessment (EA) was issued without any opportunity for public comment, contrary to the obligation of the agency to ensure that its NEPA evaluation includes "[m]eaningful participation by the public and other stakeholders." Director's Order No. 12, § 4.3 (2011). In addition, the substantive determinations in the Finding of No Significant Impact (FONSI) are patently unsupportable, and are contrary to the substantial adverse impacts identified under Section 106. Issuance of the FONSI by NPS without any opportunity for public comment, and well before the completion of the Section 106 review, makes it evident that it was not based on an actual substantive review. The EA and FONSI should be withdrawn.

6. The Committee of 100 is also deeply concerned about the transportation impacts of the Arch Proposal, given its proposed height and proximity to Reagan National Airport and its severe disruption to existing traffic patterns. Related to this, since the project requires the approval of both the Federal Aviation Administration and the Federal Highway Administration, we look forward to understanding how the NPS will meet its obligations under Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303. In our view, there are feasible and prudent alternatives to the current proposal, which NPS must address under Section 4(f) before a final decision is made.

7. Finally, we reiterate our view that the Arch Proposal is subject to the requirements of the Commemorative Works Act, 40 U.S.C. §§ 8901–8909, and the Height of Buildings Act, Pub. L No. 61-196, 36 Stat. 452 (1910). Again, considering the magnitude of this proposal and its significant impacts on the cultural landscapes administered by the National Park Service, we urge the agency to halt further consideration of the Arch Proposal unless and until the project is expressly authorized by federal statute, or unless the project is redesigned at a location and configuration that is consistent with those two statutes.

Sincerely,

Judy Chesser

Judy Chesser
Chair

cc:

Ms. Jennifer Madello, NPS - jennifer_madello@nps.gov
Mr. Jordan Hoagland, NPS - jordan_hoaglund@nps.gov
Mr. David Maloney, DC SHPO - david.maloney@dc.gov
Mr. Reid Nelson, Executive Director, Advisory Council on Historic Preservation - rnelson@achp.gov

Enclosure: Committee of 100 Comments to NPS, June 15, 2026, "Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement" (ID: 136973)

July 18, 2026

Tammy Stidham
Associate Regional Director, Lands and Planning
National Park Service, National Capital Region

Cc: Jordan Hoagland, Priority Project Coordinator, National Park Service
Jennifer Madello, Superintendent, George Washington Memorial Parkway, National Park Service

RE: NPCA Response to Invitation to Consult Under Section 106 of the National Historic Preservation Act, Proposed Triumphal Arch at Memorial Circle, George Washington Memorial Parkway

Dear Ms. Stidham:

On behalf of the National Parks Conservation Association (NPCA) and our more than 1.9 million members and supporters, thank you for the invitation to participate as a consulting party in the Section 106 review of the proposed Triumphal Arch at Memorial Circle. NPCA is a nonpartisan organization dedicated to protecting and enhancing America's national parks. We have advocated for the stewardship of George Washington Memorial Parkway, the National Mall, and national park units throughout the National Capital Region for decades. NPCA most recently served as a consulting party in the Section 106 review at Clara Barton National Historic Site, administered by the same park unit, and we bring that same commitment to constructive, substantive participation here.

We accept this invitation while noting that the Section 106 and NEPA processes conducted for this undertaking to date have been wholly inadequate. Consultation was initiated late, compressed into inadequate review periods and conducted after the decisions it was meant to inform had already been made. The environmental review considered only two alternatives for one of the most consequential additions proposed to the capital's monumental landscape in a century. And the consulting parties whose interests are most directly affected have either objected to the process or never been invited into it. It is not too late to change course, and this letter identifies specific steps needed to improve this process.

I. The Consultation Conducted to Date Has Been Wholly Inadequate

Section 106 consultation must begin early in project planning so that it can meaningfully inform agency decisions, and it must provide consulting parties a reasonable opportunity to identify concerns, advise on identification and evaluation, articulate views on effects, and participate in resolving adverse effects. NPS initiated consultation on June 5, 2026, with a ten day comment window on a lengthy Assessment of Effects and a draft Programmatic Agreement that had not yet filled in its own list of affected resources. NPCA requested consulting party status in early June and submitted comments on June 15. NPS then issued its Finding of No Significant Impact on June 18, and the National Capital Planning Commission granted preliminary site and building plan approval on July 9, before the formal invitation to consult arrived on July 10. Consultation initiated after the NEPA decision document has issued and

after preliminary design approval has been granted is not the early, meaningful consultation the process requires.

The current response window continues the pattern. The invitation allows nine days, spanning two weekends, for consulting parties to respond. Both State Historic Preservation Officers objected to a nearly identical compressed window in June. The PEPC record shows that the document now open for review is the same June 5, 2026 Assessment of Effects and draft Programmatic Agreement, reopened for public comment through July 30, 2026, unrevised and without any disposition of the comments and objections already submitted. The consultation response deadline of July 19 therefore closes eleven days before the agency's own public comment period on the identical materials. We respectfully request that NPS extend the consulting party response deadline by at least 30 days, and in no event set it earlier than the July 30 close of public comment; confirm whether the posted documents have been revised in any respect since June 5; provide a comment disposition documenting how the June 2026 submissions of consulting parties and both State Historic Preservation Officers have been addressed; and share with all consulting parties the full body of public comments received on this undertaking to date, together with the agency's analysis of and response to those views.

II. Section 106 Requires Genuine Consulting Party Engagement Going Forward

Consultation should be a sustained exchange in which consulting parties help shape identification, the assessment of effects, and the resolution of adverse effects. To date, no consulting party meeting has been convened at which parties could engage NPS and one another on this undertaking, and the record contains no evidence that any submitted comment has changed any element of the project or the agreement. For an undertaking of this magnitude, the National World War I Memorial at Pershing Park provides the appropriate benchmark: a comparable monumental core undertaking for which NPS conducted Section 106 consultation across four years, with repeated consulting party meetings, before concluding a Memorandum of Agreement in 2019.

NPCA requests that NPS commit to a structured consultation plan for this undertaking, including a schedule of consulting party meetings beginning before written responses are due, circulation of the current consulting party list, written responses to consulting party comments at each stage, and continued consultation through design development.

Despite conceded adverse effects to the Arlington National Cemetery Historic District and to the setting in which the nation buries and honors its war dead, no veterans service organizations and no organizations representing families of those interred at Arlington appear as consulting parties. NPCA requests that NPS invite them and other missing parties, complete Tribal consultation, and respond in writing to both State Historic Preservation Officers before advancing the agreement.

III. NPS Must Develop and Analyze a Reasonable Range of Alternatives

An adequate review of alternatives has not occurred. Under NEPA, an Environmental Assessment must consider a reasonable range of alternatives; the EA for this undertaking considered only two. Under Section 106, the resolution of adverse effects begins with avoidance and minimization, which cannot be evaluated without alternatives to compare. The record shows the opposite of that analysis. The Assessment of Effects acknowledges that smaller designs were rejected in part because a 250-foot height was deemed necessary to represent the 250th anniversary. Height driven by symbolism rather than by site analysis forecloses minimization by design. And comments from NPS's own

National Historic Landmarks program reviewers concluded that the documented effects cannot be minimized without relocating or abandoning the project, a conclusion that makes the absence of a relocation alternative indefensible.

NPCA requests that NPS develop and circulate to consulting parties, before any resolution of adverse effects, a genuine alternatives analysis that includes at minimum: alternative locations outside the Memorial Circle setting and outside the protected axis linking the Lincoln Memorial and Arlington National Cemetery, including the sites the District of Columbia State Historic Preservation Officer has suggested, such as the vicinity of the Frederick Douglass Memorial Bridge, and the candidate sites already identified in the National Capital Planning Commission's Memorials and Museums Master Plan, substantially reduced scale alternatives at the proposed site, alternative forms of commemoration for the 250th anniversary that do not require a permanent monumental structure in this landscape, and a no action alternative treated as a genuine option rather than a formality. Consulting parties should have the opportunity to comment on the range of alternatives before it is narrowed, not after.

IV. The Undertaking Lacks Statutory Authorization

Neither the Assessment of Effects nor the draft Programmatic Agreement cites any act of Congress authorizing construction of the Arch, and neither addresses the Commemorative Works Act, 40 U.S.C. § 8901 et seq. A permanent 250-foot commemorative arch erected to honor the nation's 250th anniversary is a commemorative work under any plain reading of the statute, and its location within Area I triggers the two step process of 40 U.S.C. § 8908, including a determination of preeminent historical and lasting significance, consultation with the National Capital Memorial Advisory Commission, and congressional approval.

Congress has not authorized this undertaking. No statute permits construction of the Arch, and an Executive Order cannot supply authority that Congress has withheld. Until Congress acts, the undertaking is unauthorized, and NPS should halt further consideration of the project until Congress has authorized it under the Commemorative Works Act.

V. The Environmental Review Cannot Support This Undertaking

The Environmental Assessment evaluated only two alternatives and concluded with a Finding of No Significant Impact for a structure that would rise more than twice the height of the Lincoln Memorial and permanently alter one of the most significant designed landscapes in the United States. The Finding of No Significant Impact issued on June 18, 2026, before Section 106 consultation with newly invited parties had begun, while the objections of both State Historic Preservation Officers were pending, and while the Assessment of Effects itself documented adverse effects to roughly two dozen historic properties. Documented adverse effects of that breadth are irreconcilable with a finding of no significant impact. An Environmental Impact Statement should be required, and when public comment was first solicited in June, neither the Environmental Assessment nor the Finding of No Significant Impact appeared in the PEPC record, leaving the public unable to review the NEPA documents on which the Programmatic Agreement's recitals rely.

VI. Conceded Adverse Effects and the Deficiencies of the Draft Programmatic Agreement

The Assessment of Effects concedes adverse effects to the Memorial Avenue Corridor Cultural Landscape, the Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and its related features, the Arlington National Cemetery Historic District, Arlington House, and the ceremonial axis

linking the Lincoln Memorial to Arlington National Cemetery that gives the cemetery its commemorative setting. The draft Programmatic Agreement cannot resolve these effects in its current form. As circulated, it contained unfilled placeholders for the number and identity of affected historic resources, undated Tribal notification letters, and consultation milestones left blank. The Agreement should not be executed until identification is complete, the area of potential effects is properly drawn, and the alternatives analysis described above has been circulated and considered.

For the reasons above, we urge NPS to:

- Refrain from proceeding absent congressional authorization under the Commemorative Works Act, and identify in writing to the consulting parties the specific statutory authority it contends permits this undertaking;
- Extend the consulting party response deadline by at least 30 days and adopt a structured consultation plan with a schedule of consulting party meetings, a circulated consulting party list, and written responses to comments at each stage;
- Invite veterans service organizations and organizations representing families of those interred at Arlington National Cemetery to consult, complete government to government consultation with federally recognized Tribes, and respond in writing to the objections of both State Historic Preservation Officers;
- Develop and circulate a genuine range of alternatives, including alternative locations such as those suggested by the DC State Historic Preservation Officer and identified in the Memorials and Museums Master Plan, reduced scale designs, alternative forms of commemoration, and a meaningful no action alternative, before resolving adverse effects;
- Complete identification and evaluation of historic properties, re-draw the area of potential effects, and decline to execute the Programmatic Agreement in its current form; and
- Withdraw the Finding of No Significant Impact and prepare an Environmental Impact Statement.

NPCA appreciates the opportunity to participate in this consultation. We intend to be an engaged and constructive consulting party, and the requests above describe the process that would make that engagement possible. Please direct all consultation materials, meeting notices, and correspondence to me at the address below.

Sincerely,



Edward Stierli
Mid-Atlantic Senior Regional Director
National Parks Conservation Association
EStierli@npca.org
777 6th Street NW, Suite 700
Washington, DC 20001

Outlook

[EXTERNAL] Re: Invitation to Consult Under Section 106 of the National Historic Preservation Act for the Proposed Triumphal Arch at Memorial Circle, Washington, DC

From Arlington Historical Society <arlingtonhistoricalsociety@gmail.com>
Date Sun 7/19/2026 9:25 AM
To Hoaglund, Jordan W <jordan_hoaglund@nps.gov>
Cc Stidham, Tammy <Tammy_Stidham@nps.gov>

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Dear Mr. Hoaglund:

Thanks for the opportunity to provide historical consultation for the proposed undertaking. The following link is to an article on AHS' website that best articulates our thoughts on the matter.

https://arlhist.org/preserving-arlingtons-historic-landscape-through-an-open-and-public-process/

The full text of the article:

Preserving Arlington’s Historic Landscape Through an Open and Public

Process

Arlington residents are being asked to consider a proposal for a monumental arch near some of the nation’s most significant historic landmarks. While opinions on the proposal vary, most agree that a project of this scale deserves an open and transparent review process that allows the public to understand the facts and share their perspectives.

The Arlington Historical Society supports a careful evaluation of the proposal through established federal, state, and local review processes, including consideration by preservation, planning, and environmental authorities. Such a review would be undertaken by the Commission on Fine Arts and the National Capital Planning Commission and would include environmental review under the National Environmental Policy Act and historic preservation review under Section 106 of the National Historic

Preservation Act. These reviews will help ensure that changes affecting nationally significant historic places are informed by expert analysis and public input.

The area surrounding Arlington House, Arlington National Cemetery, Arlington Memorial Bridge, and the Lincoln Memorial forms one of the most important historic landscapes in the United States. Completed in the early twentieth century, Arlington Memorial Bridge was designed as a symbol of national reconciliation following the Civil War. Linking the National Mall with Arlington National Cemetery, it serves as both a transportation corridor and a memorial to unity, remembrance, and shared sacrifice.

The bridge's open views and carefully planned sightlines are integral parts of its historic design. Together with Arlington House and the surrounding memorial landscape, they create a setting experienced by millions of visitors each year. These visual connections help tell an important chapter of our nation's story and have long been recognized as worthy of preservation. The historic line of sight, which also includes the Capitol and the Washington Monument, was influenced by the 1901 U.S. Senate Park Commission, better known as the McMillan Commission. Led by Senator James McMillan and guided by architect Daniel Burnham, the commission aimed to return to Pierre L'Enfant's original vision: a grand, orderly plan centered around long sightlines, open space, and monumental symmetry.

Questions about views, sightlines, and the setting of historic landmarks are not new. Preservation professionals, planners, and courts have long recognized that the surroundings of historic places often contribute as much to their significance as the structures themselves. Nearly fifty years ago, the federal government sued Arlington County to limit building heights in Rosslyn (*United States v. County Board of Arlington County*). They argued that tall structures could adversely affect the visual experience of the nation's monuments and memorials. While the court did not block the construction of these buildings, the case remains an important example of the longstanding public interest in preserving the historic character and integrity of the National Capital Region.

The Arlington Historical Society believes that any change to one of the nation's most historically significant lines of sight should be evaluated through a thorough and open public process. A process that considers historic preservation, visual impacts, planning principles, and public input before decisions are made. The history of Washington and Arlington demonstrates that major alterations to the monumental landscape have traditionally been preceded by careful study and public debate.

References

Arlington Historical Society, "Restoring the Capital Vision," accessed June 15, 2026, https://arlhist.org/restoring-the-capital-vision/.

Lynton, Stephen J. "A Long Road: Bitter Fight Against I-66 Now History." *The Washington Post*, December 21, 1982.

Perry, Nancy. "How Eminent Domain Destroyed an Arlington Community." *Arlington Historical Magazine*, 2017.

United States v. County Board of Arlington County, 487 F. Supp. 137 (E.D. Va. 1979).

Submitted by the Arlington Historical Society Board

Arlington Historical Society



On Fri, Jul 10, 2026 at 5:21 PM Hoaglund, Jordan W <jordan_hoaglund@nps.gov> wrote:

> The National Park Service (NPS) is inviting you to participate as a consulting party in the review of a proposed undertaking pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800. The proposed undertaking involves construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. The NPS is the lead federal agency for this undertaking.
>
> The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1). The undertaking would introduce a new permanent structure, associated hardscape, lighting, security elements, utility infrastructure, stormwater facilities, and traffic and pedestrian circulation changes into the Memorial Circle setting and would thereby alter characteristics of historic properties that qualify for inclusion in the National Register of Historic Places. In particular, the undertaking has the potential to impact the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and other related historic properties within the area of potential effects. The undertaking would also introduce new visual elements not presently found within Memorial Circle and change physical features within the setting that contributes to the significance of the historic district and cultural landscape.
>
> Because of the phased nature of the undertaking, and because aspects of the project will continue to be refined during design development, the NPS has prepared a draft Programmatic Agreement (PA) to govern the resolution of adverse effects associated with the undertaking. The draft PA is intended to establish procedures for continued review, treatment, mitigation, and implementation as the project advances.
>
> NPS is specifically seeking information from you regarding knowledge of, or concerns with, historic properties in the area near the potential undertaking, and your thoughts on issues related to the potential undertaking's effects on such historic properties.
>
> Please provide any information, in writing, you wish for NPS to consider regarding the above request by July 19, 2026.
>
> Enclosed link for your review are the following materials - https://parkplanning.nps.gov/triumphalarch
>
> - Assessment of Effects
> - Draft Programmatic Agreement
>
> Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.
>
> Thank you for your consideration and participation in this consultation.
>
> Jordan Hoaglund
> **National Park Service**
> Priority Project Coordinator (Detail)
> Washington Support Office
> 1849 C Street; Room 3321
> Washington, DC 20240

Cell: 303-565-6796

Please see my Shared Calendar for specific availability.

National Mall Coalition

July 19, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, D.C. 20242

Via email: tammy_stidham@nps.gov

Dear Ms. Stidham:

In response to the June 10th email from Jordan W. Hoagland, I am writing on behalf of the National Mall Coalition ("Coalition") to accept the National Park Service ("NPS") invitation to participate as a Consulting Party for the Historic Preservation Section 106 review of the proposed undertaking involving construction of a Triumphal Arch at Memorial Circle.

Since our founding in 2000, the Coalition, a grassroots nonprofit organization of architects, historians, planners, and concerned citizens, has worked to protect the brilliant legacy of the historic 1791 L'Enfant and 1902 McMillan Plans for the capital and the National Mall and to ensure the vitality, beauty, and continued active role of the Mall in the capital and in American life. The first goal honors the visionary L'Enfant design that laid out the Mall as an embodiment in landscape and architecture of America's founding principles. The second goes to the heart of American democracy – the role of the people in decision-making for the Stage for American Democracy.

In our opinion, the proposed Triumphal Arch project violates both these objectives – and the laws put in place by Congress to ensure protection of the historic plans and the public consultation process. The Coalition submitted comments to this effect to NPS on June 15, 2026 (included below). We reiterate what we wrote then: "The Coalition urges NPS to send the project back to the drawing board unless and until basic questions can be discussed in a proper, lawful public consultation process, including: What is the *purpose* of a monument celebrating our 250th anniversary? What alternative symbolic forms – besides a victory arch (what victory?) – could symbolize *e pluribus unum*, democracy, freedom? Where should a 250th monument most meaningfully be located? What meaning will a 250th monument add to the beauty and symbolism of the capital and the Mall? What do we want Americans and foreign visitors to take away from their experience of such a monument?"

The Coalition wishes to associate our organization with the comments submitted on July 17 by the Committee of 100 on the Federal City. (See attached pdf) We strongly support the Committee's observations and criticisms of the project and the public process.

In addition, we wish to associate our organization with several of the thoughtful observations, criticisms, and recommendations made during the public testimony phase of the June 9, 2026 NCPC meeting. Comments presented – in person and on Zoom – by architects, architectural historians, historic preservationists, and veterans pointed out that the location, architectural form, and size of the Arch would constitute grave "adverse effects" to the historic design, symbolism, and meaning of the capital city and Mall. The lack of a timely and meaningful public consultation process *before* NPS took the project to the Commission of Fine Arts (and received final approval) and NCPC destroyed even the semblance of a meaningful public process for our country's preeminent nationally significant landscape and cultural resource. In addition:

- Architectural historian Professor Bryan Green made a crucial point that we do not find taken into consideration in any of the NPS documents and NCPC reports: "The form itself is wrong." Triumphal arches have a long history. They are a form with meaning: triumph, victory, conquest. But this corridor connecting the Mall and the Lincoln Memorial across Memorial Bridge to Arlington National Cemetery is not about victory or triumph. It honors service to country. A Triumphal Arch at that location violates the essential meaning of Memorial Circle and also, tragically, of the sacrifice of veterans buried there.
- Several members of the public, including the President of the Society of Architectural Historians, pointed out that the list of affected Cultural Resources in the NPS documents is severely lacking, missing many important landscapes that will be adversely impacted.

The Coalition would add that effects on the historic L'Enfant and McMillan Plans, which are protected by the Commemorative Works Act, also have received little mention or serious analysis. L'Enfant's original 1791 plan may have ended just west of the Washington Monument, but the 1902 McMillan Plan quite intentionally embraced and extended the design and national symbolism when it extended the Mall to the Lincoln Memorial and across Memorial Bridge to Arlington Cemetery. Providing reinforcement to this point, the Committee of 100 in the Appendix to its comments directly quotes the McMillan Plan, showing that NPS and the project sponsors are either ignorant of or misinterpreting the Commission members intentions. If there were to be an Arc de Triomphe, it would be a monument to Lincoln – at the Lincoln Memorial site:

> At the [western end of the Mall], a great rond pointe, placed on the main axis of the Capital and the [Washington] Monument, becomes a gate of approach to the park system of the District of Columbia. Centering upon it as a great point of reunion are the drives leading southeast to Potomac Park and northwest by the Riverside Drive to the Rock Creek system of parks from this elevation of 40 feet. The Memorial Bridge leads across the Potomac directly to the base of the hill crowned by the mansion house of Arlington. Crowning the rond pointe as the Arc de Triomphe crowns the Place de l'Étoile at Paris, should stand a memorial erected to the memory of that one man in our history as a nation who is worthy to be named with George Washington - Abraham Lincoln. . . . Whatever may be the exact form selected for the memorial to Lincoln, and type it should possess the quality of universality, and also it should have the character essentially distinct from that of any monument either now existing in the District or hereafter to be erected. (McMillan Plan, pp. 51-52)

We urge NPS to go back to the drawing board with the Triumphal Arch project, open a Section 106 consultation process, and begin discussions about site, form, and meaning. Let's start by asking how and where we can respectfully honor the 250th anniversary of American democracy.

Sincerely,



Judy Scott Feldman, PhD
Chair, National Mall Coalition
jfeldman@nationalmallcoalition.org

June 15, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, D.C. 20242

RE: Participation as a "consulting party" in the Section 106 process for the Triumphal Arch. Comments on the Arch project

The National Mall Coalition hereby requests status as a "consulting party "to the proposed Triumphal Arch at Memorial Circle undertaking. The Coalition submits the following public comments.

The National Mall Coalition, a grassroots nonprofit organization of architects, historians, planners, and concerned citizens, has worked since our founding in 2000 – including as a "consulting party" for numerous Mall-area projects – to protect the brilliant legacy of the historic 1791 L'Enfant and 1902 McMillan Plans for the capital and the National Mall and to ensure the vitality, beauty, and continued active role of the Mall in the capital and in American civic life.

Whatever one thinks of a triumphal arch, the location chosen at Memorial Circle will interfere with the brilliant historic plans, including L'Enfant's inspired initial plan, that give our capital the visual and symbolic power revered by Americans and foreign visitors alike. An arch towering over Memorial Circle will break the continuous line from the Capitol to the Washington Monument to Lincoln and across the Potomac to Arlington Cemetery. It will sever the sublime vista and symbolism of post-Civil War reconciliation from Lincoln to Arlington National Cemetery and, for visitors to that sacred ground, from Arlington to Lincoln. Many veterans are justly opposing the arch for the damage it does to the view of Arlington Cemetery.

The Coalition sees scant evidence in the publicly available design review materials that the design team understands or respects the historic concepts embedded in the capital and the Mall, the Stage for American Democracy. On the contrary, the choice of a triumphal arch, its proposed location, and the colossal size signal an *intentional rupture* in the historic vision and the US Constitution-based symbolism that have defined the capital since L'Enfant's plan in 1791 and the McMillan Commission's expansion of that plan in 1902 to include the Lincoln Memorial and site for the Jefferson Memorial – a rupture totally at odds with the Enlightenment ideals that inspired the Constitution and the 1791 Plan.

The proposed arch's violation of the capital's historic planning foundations, along with NPS's lack of a meaningful public review process, cannot be ignored or minimized. It represents, in the Coalition's view, an affront to American democracy.

The Coalition urges NPS to send the project back to the drawing board unless and until basic questions can be discussed in a proper, lawful public consultation process, including: What is the *purpose* of a monument celebrating our 250th anniversary? What alternative symbolic forms – besides a victory arch (what victory?) – could symbolize *e pluribus unum*, democracy, freedom? Where should a 250th monument most meaningfully be located? What meaning will a 250th monument add to the beauty and symbolism of the capital and the Mall? What do we want Americans and foreign visitors to take away from their experience of such a monument?

Congress declared the Mall a "substantially completed work of civic art" in 2003 and yet we continue to see proposed additions – in this case without Congressional authorization.

Overwhelming public outrage against the proposed Triumphal Arch is proof that this project has failed to satisfy, let alone seriously consider, these questions. As the project stands now, the Arch is a colossal symbol not of American democracy but of its precariousness in the face of a willful and careless administration. It's time to recover respect for the capital's visionary planning legacy and the public consultation process that sustains Americans' faith in their democracy.

Submitted on June 15, 2026, by:

Judy Scott Feldman, PhD
Chair, National Mall Coalition
jfeldman@nationalmallcoalition.org /301-335-8490

National Trust for Historic Preservation®

July 19, 2026

Tammy Stidham
Associate Regional Director – Lands & Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

via email: tammy_stidham@nps.gov

Re: Proposed Triumphal Arch at Memorial Circle, Washington, DC

Dear Ms. Stidham,

The National Trust for Historic Preservation[1] deeply appreciates the invitation we received on July 10, 2026 from the National Park Service (NPS) to participate as a consulting party under Section 106 of the National Historic Preservation Act (NHPA) with respect to the proposed construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. The July 10 email from Jordan Hoagland to Brent Leggs, our President and CEO, requested comments by July 19 (today). Meanwhile, we are pleased to see that the NPS has reopened the opportunity for broader public comments on the Section 106 documents through July 30, 2026, on its Planning, Environment & Public Comment (PEPC) website (https://parkplanning.nps.gov/document.cfm?parkID=186&projectID=136973&documentID=151576).

The Effects Report and Draft PA are legally insufficient and require substantial revisions to achieve compliance with the NHPA and its implementing regulations. 54 U.S.C. §§ 300101 et seq. and 36 C.F.R. Part 800. The proposed undertaking also fails to comply with the Commemorative Works Act, 40 U.S.C. §§ 8901–8910, the Height of Buildings Act, Pub. L. 61–196, 36 Stat. 452, the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332, and Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303(c). We strongly urge the National Park Service to ensure full compliance with all relevant federal laws and

[1] The National Trust for Historic Preservation in the United States is a private nonprofit organization chartered by Congress in 1949 to "facilitate public participation" in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. 54 U.S.C. § 312102(a). With more than one million members and supporters around the country, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. In addition, the National Trust has been designated by Congress as a member of the Advisory Council on Historic Preservation, which is responsible for working with federal agencies to implement compliance with Section 106 of the NHPA. *Id.* §§ 304101(a)(8), 304108(a).

regulations for this undertaking, especially given its high profile and controversial nature. To assist NPS, the National Trust has identified the following deficiencies:

Failure to Comply with Section 106 of the NHPA

- Since the Finding of No Significant Impact (FONSI) was released more than a full month ago, the NPS has failed to comply with the statutory requirement that Section 106 review must be completed "prior to" approval of the project, 54 U.S.C. § 306108. This after-the-fact review under Section 106 creates the strong impression that the agency is merely going through the motions, with the already-decided intention of rubber-stamping the proposed plans.

- The use of a Programmatic Agreement is inappropriate for this undertaking. None of the requirements established in 36 C.F.R. § 800.14(b) are met: this undertaking is not a program, a complex project situation, nor does it encompass multiple undertakings, and it does not meet any of the criteria listed in § 800.14(b)(1). The project's height, scale, mass, architectural style, and the adverse effects that it will inflict upon numerous historic resources are all well known. There is thus no legal justification for deferring the specific resolution of these adverse effects through subsequent design review and mitigation negotiations via the use of a Programmatic Agreement for this undertaking. We encourage NPS instead to develop a Memorandum of Agreement.

- The Effects Report and the Draft PA do not adequately consider the avoidance and minimization of adverse effects. The whole point of the Section 106 consultation process is to "develop and evaluate *alternatives* or *modifications* to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties." 36 C.F.R. § 800.6(a) (emphasis added). The NPS has failed to consider less harmful alternatives and modifications to the project that are being suggested by the consulting parties.

- We specifically support the suggestion by the DC State Historic Preservation Officer, in a June 26 letter to the NPS Regional Director, that the proposed Arch could be shifted to a much less harmful location at the base of South Capitol Street near the Anacostia riverfront. Moving the project to this location would avoid adverse effects on existing memorials. This location would also place the Arch on a direct axis with the U.S. Capitol Building, and would create a celebratory focal point for the bustling neighborhood that continues to emerge between Audi Field and Nationals Park. It's a much more inviting and hospitable place for crowds of visitors to see the Arch. The NPS must give serious consideration to this much less harmful alternative.

- The Effects Report correctly identifies 12 historic resources that would suffer "[T]he most substantial effects meeting the criteria of 36 CFR § 800.5(a)(1) … all of which derive significance in part from their planned visual, commemorative, and spatial relationships across the Potomac River and through the monumental core."[2] However, the section on

[2] "Memorial Avenue Corridor Cultural Landscape, Arlington Memorial Bridge, Lady Bird Johnson Park Cultural Landscape, Arlington National Cemetery Historic District, Arlington

"Avoidance, Minimization, and Mitigation Measures" in the Effects Report fails to consider the avoidance and minimization of adverse effects for all of these substantially affected historic resources.[3] Instead, it only considers a limited direct sightline between the Lincoln Memorial and the entrance of Arlington National Cemetery to arrive at the conclusion that the height and scale of the proposed arch should not be reduced. This inappropriate limitation does not satisfy NPS's responsibility to consider the avoidance and minimization of adverse effects to all historic resources that would be adversely affected by the proposed project.

- The Draft PA's recitals should be amended to include descriptions of the 12 historic resources identified by the Effects Report as being most substantially affected by the proposed undertaking and their relationships to each other. Currently, only the George Washington Memorial Parkway and Memorial Circle are identified in the recitals, despite other historic resources being significantly impacted by the proposed project.

- The Effects Report and Draft PA do not adequately address the proposed project's impacts on Arlington National Cemetery. As the hallowed resting place of 400,000 veterans and their families, Arlington National Cemetery is a powerful reminder of American military sacrifice, and national unity, all within sight of the monumental core of the Nation's Capital. Distinguished by its rolling hillsides with uniform rows of solemn graves lined with powerful, unadorned headstones, Arlington National Cemetery is a living memorial that hosts hundreds of funeral services every month. The Arch, as proposed, would dominate the National Cemetery, and would be inconsistent with its solemn and hallowed character. The Effects Report does not record any meaningful efforts to avoid or minimize these significant adverse effects, instead narrowly focusing on a limited sightline between the entrance of Arlington National Cemetery and the Lincoln Memorial. The Effects Report and Draft PA do not adequately address the impact on Arlington House, the Eternal Flame, and Arlington National Cemetery and the view from those historic resources to the Lincoln Memorial, which will be blocked by the proposed Arch.

- The Effects Report and Draft PA do not adequately consider the proposed undertaking's impacts on the Lincoln Memorial. The proposed arch is double the size of the Lincoln Memorial and would diminish and disrupt its iconic and powerful presence. The Effects Report does not document any consideration of the avoidance or minimization of the adverse effects that would be imposed on the Lincoln Memorial due to the unprecedented height and scale of the proposed Arch, and the Draft PA does not provide for any such consideration in the future. As with Arlington National Cemetery, the Effects Report's consideration of the avoidance or minimization of adverse effects on the Lincoln Memorial due to the height and scale of the proposed arch is inappropriately limited to a

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House Historic District, Arlington House (Robert E. Lee Memorial), Arlington House Cultural Landscape, Lincoln Memorial Cultural Landscape, the Lincoln Memorial, National Mall Site, National Mall Historic District, and The Mall Cultural Landscape." Pg. 21-22, *Triumphal Arch at Memorial Circle Assessment of Effects Report.*

[3] Pg. 22-23, *Triumphal Arch at Memorial Circle Assessment of Effects Report.*

single sightline rather than the totality of adverse effects.

- The abnormally short comment period for this undertaking is inadequate to satisfy NPS's consultation responsibilities under Section 106. "[T]he agency official should plan consultations appropriate to the scale of the undertaking." 36 C.F.R. § 800.2(a)(4). "[T]he agency official should consult with the SHPO/THPO in a manner appropriate to the agency planning process for the undertaking and to the nature of the undertaking and its effects on historic properties." *Id.* § 800.3(c)(3). The proposed undertaking would dramatically and jarringly alter some of the most hallowed and important landmarks in our nation and would inflict significant adverse effects upon them. In addition, the public opposition to the proposal has been overwhelming. It is inappropriate and unreasonable for the consultation process for such a major undertaking to be limited to only one consultation meeting, which did not include any of the historic preservation organizations invited after-the-fact to join as consulting parties. This severe limitation of the Section 106 consultation process is highly irregular and inconsistent with legal requirements.

Failure to Comply with Section 110(f) of the NHPA for National Historic Landmarks

- The requirements of Section 110(f) of the NHPA have not been met. When an undertaking "may directly and adversely affect" a National Historic Landmark (NHL), Section 110(f) requires that the federal agencies "to the maximum extent possible undertake such planning and actions as may be necessary to minimize harm to the landmark." 54 U.S.C. § 306107. NPS has not come close to meeting the "maximum extent possible" threshold here.

- Appendix D to the Effects Report identifies seven NHLs within the Area of Potential Effects: the Pentagon; the Smithsonian Building; Georgetown Historic District; Old Naval Observatory; the United States Capitol; Fort Myer Historic District; and Quarters 1. The Pentagon is acknowledged to have the potential for "direct and indirect adverse effects," thus triggering the requirements of Section 110(f).[4]

- In addition, the Fort Myer Historic District and Quarters 1 are acknowledged to expect adverse indirect effects. NPS has failed to engage in ***any*** efforts to avoid or minimize adverse effects to these National Historic Landmarks, and the irregularly short Section 106 consultation for this undertaking inherently precludes its qualification as a maximal planning effort. Further, there is no evidence that NPS's National Historic Landmark program has been included in this consultation, which is standard practice to ensure Section 110(f) compliance.

Failure to Comply with the Height of Buildings Act

- The undertaking's non-compliance with the Height of Buildings Act is obvious and indisputable. Pub. L. 61–196, 36 Stat. 452. Given that non-compliance with this federal

[4] Pg. 23-24, *Triumphal Arch at Memorial Circle Assessment of Effects Report.*

law is also the cause of the proposed undertaking's most severe adverse effects, NPS should require the correction of this legal deficiency prior to concluding the Section 106 consultation process. Compliance with applicable federal law is a minimal baseline for achieving reasonable avoidance and minimization of adverse effects as required by the NHPA. NPS would be betraying its stewardship responsibilities by authorizing a project that violates federal law and inflicts substantial adverse effects upon historic resources.

Failure to Comply With Section 4(f) of the Department of Transportation Act

- Section 4(f) of the Department of Transportation Act prohibits the "use" of historic sites and parks that will be adversely affected, unless there is no feasible and prudent alternative to doing so, and the project includes "all possible planning to minimize harm" to the adversely affected property. 49 U.S.C. § 303(c); 23 C.F.R. Part 774. Both the Federal Highway Administration (FHWA) and the Federal Aviation Administration (FAA) have review and approval roles for this project, and their approval must be preceded by compliance with Section 4(f), which has not occurred.

- The FHWA is listed as a Consulting Party on page 4 of the Effects Report. However, the FAA is *not* included in the Consulting Party list, even though the FAA has been involved in reviewing the height of the proposed Arch, in light of its proximity to National Airport and the risk of interference with flight patterns for approaching and departing flights. In fact, news reports have stated that the FAA will require flashing red lights on top of the arch as an aviation safety measure, which would dramatically exacerbate its adverse visual effects. The FAA needs to be added as a Consulting Party.

- Substantively, the proposed project fails to comply with Section 4(f) because there are feasible and prudent alternatives that would avoid or minimize harm to the affected historic properties, and the plans fail to include all possible planning to minimize harm.

Failure to Comply With the National Environmental Policy Act

- The Draft PA states (in the second-to-last Whereas Clause on p.3) that "NPS completed an EA, published June 5, 2026, as part of NPS's NEPA compliance and issued the Finding of No Significant Impact." That statement is false, because the EA and FONSI were not posted on the NPS's PEPC website until June 18. In any event, as you know, NPS has provided no opportunity whatsoever for any public comment on the NEPA documents.

- The fact that the FONSI was issued more than a month ago, without prior completion of Section 106 review, highlights the fact that its conclusion of "no significant impact" is arbitrary and fundamentally contradicted by the record.

- In our view, compliance with NEPA requires the preparation of a full Environmental Impact Statement in this case, because the proposed project is a "major Federal action[] significantly affecting the quality of the human environment," per 42 U.S.C. § 4332(2)(C). The public opposition to the proposed Arch has been overwhelming, and the project would result in adverse effects to a large number of nationally significant historic and

cultural resources.

Failure to Comply With the Commemorative Works Act and Failure to Obtain Congressional Authorization

- Finally, we remind the National Park Service that the proposed undertaking requires the approval of Congress pursuant to the Commemorative Works Act at 40 U.S.C. §§ 8901-8909, and 40 U.S.C. § 8106, which requires Congressional authorization for any structure erected on public grounds of the Federal Government in the District of Columbia.

The National Trust again thanks NPS for this opportunity to participate as a consulting party and to comment on the proposed undertaking. We strongly urge NPS to engage in meaningful Section 106 consultation with all consulting parties and to thoughtfully address the issues identified above. Substantially more effort is required for this proposed undertaking to achieve NHPA compliance, and the National Trust would be happy to assist NPS in meeting its legal obligations. Thank you for your consideration of our comments.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

David L. Bulova
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July 21, 2026

Ms. Jennifer T. Nersesian
Regional Director, National Capital Region
National Park Service
5300 Wellington Branch Drive, Suite 100
Gainesville, Virginia 20155

Re: Triumphal Arch at Memorial Circle
Arlington, Virginia
DHR File No. 2026-4065

Dear Ms. Nersesian:

The Department of Historic Resources (DHR) has received from the National Park Service (NPS) a request for comments regarding their Area of Potential Effects (APE) and "to identify the historic properties located within the APE." DHR's comments regarding the APE and the current identification of historic properties are below. DHR reminds NPS that the Federal Agency is responsible for conducting a reasonable and good faith effort to identify historic properties, not SHPO. In an effort to assist NPS, DHR can provide some additional information about historic properties DHR knows to be within the APE, both as currently defined and beyond, but DHR continues to expect that NPS will fulfill its obligations under 36 CFR § 800.4 to identify and evaluate historic properties that are not listed within the National Register of Historic Places (NRHP) within the APE.

Area of Potential Effects

DHR understands that NPS has generally established the APE based on GIS analysis (which has not been provided), topography and existing urban infrastructure, and previous APEs for undertakings in the vicinity including the Long Bridge project and the Memorial Bridge rehabilitation. DHR notes that none of the projects cited by NPS rise to the scale of the proposed new construction in height and visibility. DHR would appreciate the opportunity to learn more about the GIS modelling NPS has used and DHR questions why a viewshed model could not be included in this documentation if NPS conducted this analysis.

The view renderings provided in Appendix A include primarily views from Washington, DC with only three (3) from points in Virginia (all focused on Arlington National Cemetery) in addition to the observation deck views that show areas of Virginia. The potential views from the proposed observation deck looking Northeast and South (pages 43 and 44) illustrate the distance from which this Arch will be visible and it encompasses significantly more than what NPS has identified within their APE. DHR reiterates our recommendation to conduct or provide a viewshed study, not renderings of views of the Arch from select locations but analysis of properties from where the Arch will

be visible. Renderings are useful in assessing effects but when only one historic property within Virginia is depicted, it is not clear that all potential effects are considered based on the information provided.

Specifically, please clarify how the boundary of Arlington Boulevard to the north and northwest takes into consideration the height and visibility of the proposed Arch in relation to the numerous multi-story buildings and the topography. To the west and north of the River on the Virginia side of the APE, the topography, which generally slopes upward, and the curve of the Potomac River would allow for views of the Arch from, at a minimum, areas and buildings located immediately outside the APE (also clearly illustrated in page 43 of Appendix A). DHR recommends that NPS determine whether additional areas in Arlington, particularly to the north of the APE, should be considered based on the views already provided in Appendix A.

To the south of Arlington National Cemetery, please justify the decision to stop the APE at Southgate Road. This cut off excludes the Air Force Memorial (DHR Inventory No. 000-9821, previously recommended potentially eligible for listing in the NRHP) from consideration of the effects. This memorial includes open views towards the Pentagon, across the Potomac River to Washington DC and overlooking Arlington National Cemetery. DHR recommends its inclusion in the assessment of effects or further analysis regarding the potential visibility of the Arch from this location.

"Direct" and "Indirect" Effects

It is DHR's opinion that the distinction used by NPS to establish the APE between "direct" effects and "indirect" effects is incorrect. In 2019, the D.C. Circuit US Court of Appeals determined, in National Parks Conservation Association v. Semonite et al., that the term "directly" in Section 110(f) of that NHPA (54 U.S.C. 306107) refers to causality not physicality of the effects. ACHP has since issued guidance that clarifies that "if the effect comes from the undertaking at the same time and place with no intervening cause, it is considered 'direct' regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). 'Indirect' effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable." (https://www.achp.gov/news/court-rules-definitions-informs-agencies-determining-effects).

Visual, auditory, or atmospheric effects that are directly caused by an undertaking and will diminish the integrity of a historic property are direct adverse effects. It is DHR's opinion that the historic properties that NPS has identified in the APE for "indirect" effects (in Table 2 of Appendix D), primarily identified as having potential visual effects, will be directly affected by this undertaking and should be described as such.

NPS has provided no explanation regarding whether the potential for reasonably foreseeable additional effects to historic properties has been considered. Has NPS conducted traffic studies to understand whether the undertaking will result in potential changes to the traffic flow and pedestrian use of the George Washington Memorial Parkway or Arlington Memorial Bridge long term? DHR understands that the Federal Aviation Administration (FAA) will be conducting an aeronautical study as part of this undertaking and that safety lights will be required on the Arch; how has NPS considered the potential reasonable and foreseeable effects of changes to air traffic patterns around the Arch and to/from Reagan Washington National Airport? DHR notes that Reagan Airport has not been included in the APE for this undertaking; due to many restrictions on airspace within this area, additional properties may need to be included in the APE if the aeronautical study suggests changes to air traffic flow around the proposed Arch.

Identification of Historic Properties

DHR reiterates our previous comment from June 15 that the identification of historic properties (as described in Appendices C and D) has thus far only included properties listed in the National Register of Historic Places and National Historic Landmarks. 36 CFR 800.16 (l) defines a historic property as "any prehistoric or historic district,

site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places." Under 36 CFR 800.4 (a) (3), NPS has the responsibility to identify and evaluate possible historic properties that are not yet identified and are not currently listed in the NRHP as part of their identification efforts.

To assist NPS in their ongoing identification efforts, DHR has provided, as an attachment to this letter, maps from DHR's Virginia Cultural Resource Information System (VCRIS) of the properties DHR has currently recorded within the APE. While NPS stated that they consulted VCRIS in their July 10 letter, their identification efforts do not reflect any consideration of this data. NPS has a license to access VCRIS and should include a thorough search of our database in their identification of historic properties. DHR reminds NPS that this information includes properties that have been determined eligible as well as properties that warrant further evaluation of eligibility. When determining the scope of any further identification efforts that should be undertaken, DHR recommends considering what previous surveys have occurred and the age of previous investigations/evaluations; per 36 CFR 800.4 (c) (1) "the passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible.".

As it is clear from the existing VCRIS data alone that the potential historic properties in the APE exceed those currently identified by NPS, please advise DHR regarding the proposed scope of additional identification efforts that NPS intends to undertake in order to determine what historic properties are located within the APE. If NPS needs assistance accessing VCRIS as part of their review, please contact our Archives Staff.

DHR reminds NPS that the level of effort afforded to an undertaking's identification of historic properties should take into account "the magnitude and nature of the undertaking and the degree of Federal involvement [and] the nature and extent of potential effects on historic properties." As stated in our June 15 and July 1 letters, it remains DHR's opinion that the magnitude of this undertaking and nature of the potential effects to historic properties is significant; to quote our colleagues in DC "this will be the tallest and most visible monument constructed in the District since completion of the Washington Monument." (letter dated June 26). Therefore, in accordance 36 CFR 800.4 (b) (1), it is DHR's opinion that the undertaking warrants further effort to meet the expectation of a reasonable and good faith effort to carry out identification of historic properties.

Please contact me at samantha.henderson@dhr.virginia.gov or (804) 482-6088 to continue consultation on this undertaking.

Sincerely,

Samantha Henderson, Director
Review and Compliance Division

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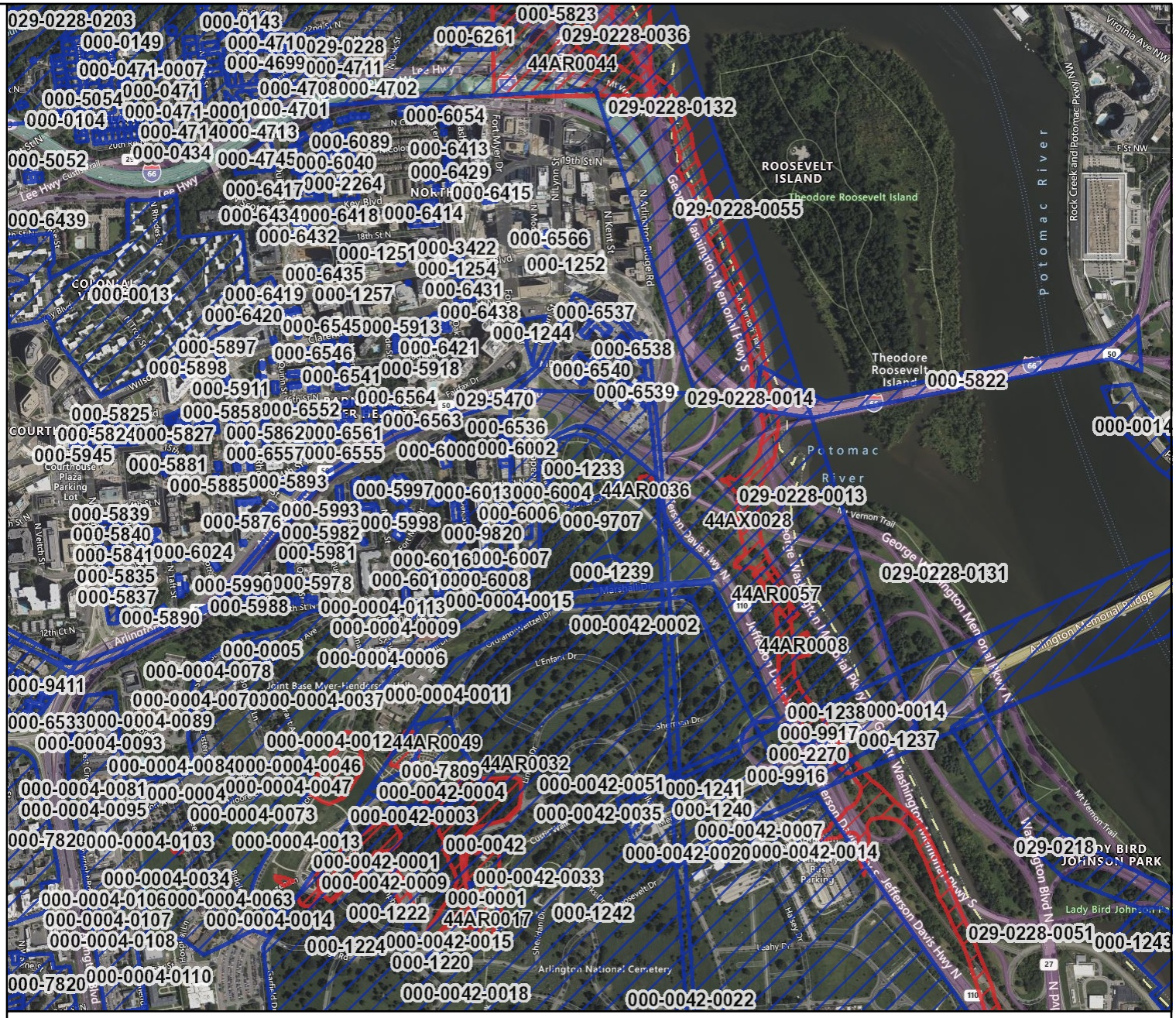
Virginia Dept. of Historic Resources

V-CRIS

Virginia Cultural Resource Information System

Legend

- Architecture Resources
- Architecture Labels
- Archaeological Resources
- Archaeology Labels
- DHR Easements
- County Boundaries



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Feet

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Title: DHR File No. 2026-4065 APE (north)

Date: 7/21/2026

DISCLAIMER:Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions.The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain errors and is provided "as-is". More information is available in the DHR Archives located at DHR's Richmond office.

Notice if AE sites:Locations of archaeological sites may be sensitive the National Historic Preservation Act (NHPA), and the Archaeological Resources Protection Act (ARPA) and Code of Virginia §2.2-3705.7 (10). Release of precise locations may threaten archaeological sites and historic resources.

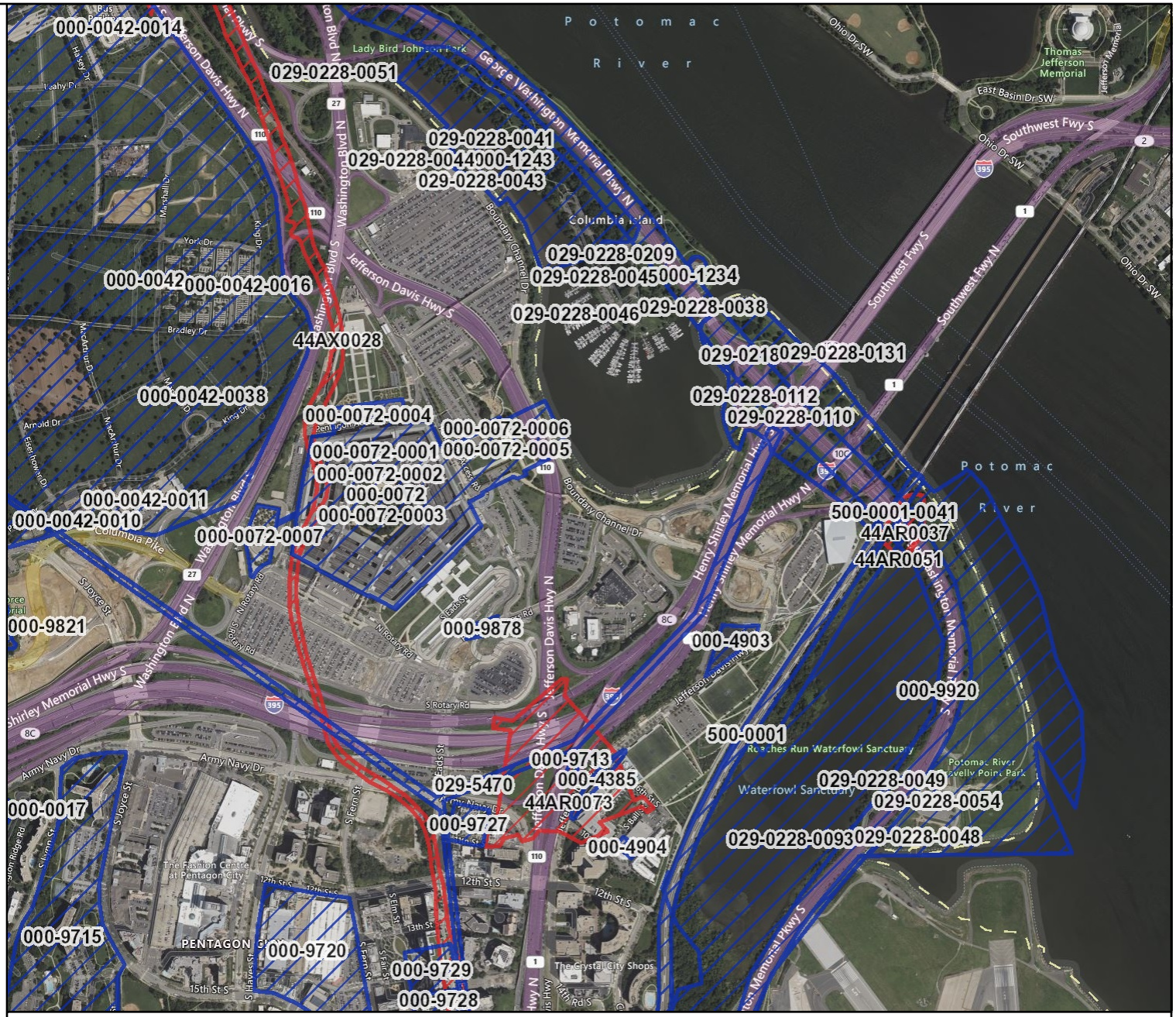
Virginia Dept. of Historic Resources

V-CRIS

Virginia Cultural Resource Information System

Legend

- Architecture Resources
- Architecture Labels
- Archaeological Resources
- Archaeology Labels
- DHR Easements
- County Boundaries



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Title: DHR File No. 2026-4065 APE (southeast) **Date: 7/21/2026**

DISCLAIMER:Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions.The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain errors and is provided "as-is". More information is available in the DHR Archives located at DHR's Richmond office.

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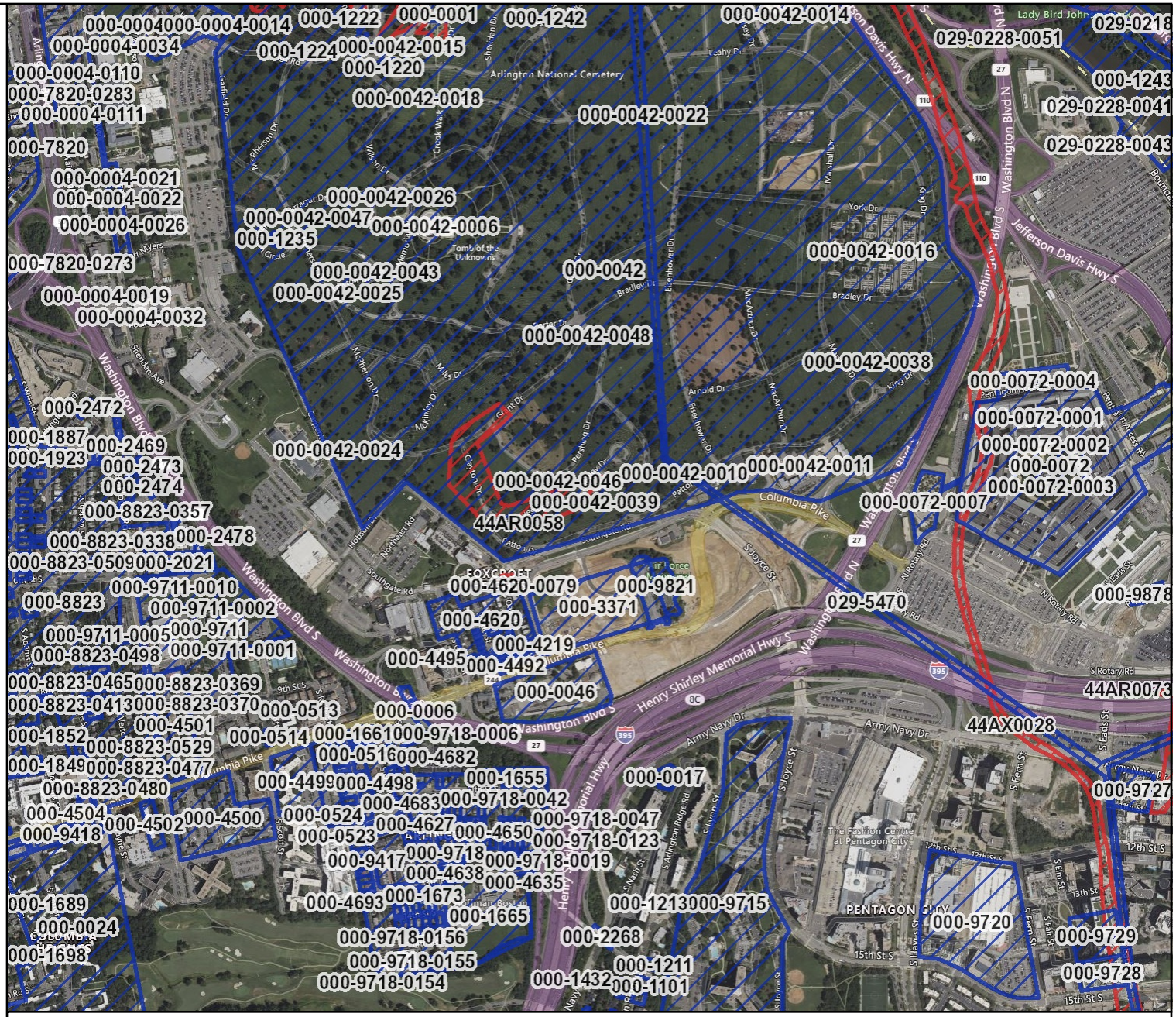
Virginia Dept. of Historic Resources

V-CRIS

Virginia Cultural Resource Information System

Legend

- Architecture Resources
- Architecture Labels
- Archaeological Resources
- Archaeology Labels
- DHR Easements
- County Boundaries



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Feet

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1:18,056 / 1"=1,505 Feet

Title: DHR File No. 2026-4065 APE (southwest) **Date: 7/21/2026**

DISCLAIMER:Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions.The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain errors and is provided "as-is". More information is available in the DHR Archives located at DHR's Richmond office.

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July 24, 2026

Ms. Jennifer T. Nersesian, Regional Director
National Capital Region
National Park Service
1100 Ohio Drive, SW
Washington, DC 20024

RE: Additional Comments on the Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle

Dear Ms. Nersesian:

The District of Columbia State Historic Preservation Officer (DC SHPO) received the National Park Service's (NPS) most recent letter regarding the proposed Triumphal Arch in Memorial Circle on July 10, 2026. This letter provides additional comments in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

We are pleased that consulting party status has been granted to the additional organizations that requested to participate in consultation. Opportunities for those parties and the public to comment should remain open until the consultation process is concluded.

With regard to the Area of Potential Effect (APE), we appreciate the detailed information that was provided to explain how the draft APE, which is attached for reference, was developed. We offer the following additional comments on that draft:

- Per 36 CFR 800.16(d) and as noted in your letter, the APE is "…influenced by the scale of the undertaking." Since the height and visibility of the proposed monumental arch would make it a permanent addition to the skyline of the nation's capital, a robust APE that includes comparable landmarks on the skyline is warranted.

- As previously noted, the visibility of the arch from areas of higher elevation should be evaluated. For this reason, we recommend that the NPS consider panoramic views from places such as the "Overlook" at St Es, views from the Washington National Cathedral observation deck, views from the Frederick Douglass National Historic Site (Cedar Hill), and the like. If such areas are included, they can be included as discontiguous sections of the APE.

- We note that the majority of East Potomac Park and points south (e.g. JBAB) are excluded from the APE. Was this decision based upon flag tests (i.e. balloon tests such as those conducted for cell phone antennas), site visits and/or related efforts which confirmed the monument would not be visible from these areas? For comparison, the new Frederick Douglass Bridge is 168' tall and highly visible from a very large area (see image below). A monument that exceeds that height by an additional 82' would be comparable in terms of effects and visible from an even larger area.



- Additional information about historic properties that fall within the APE is available via our PropertyQuest website (www.propertyquest.dc.gov)

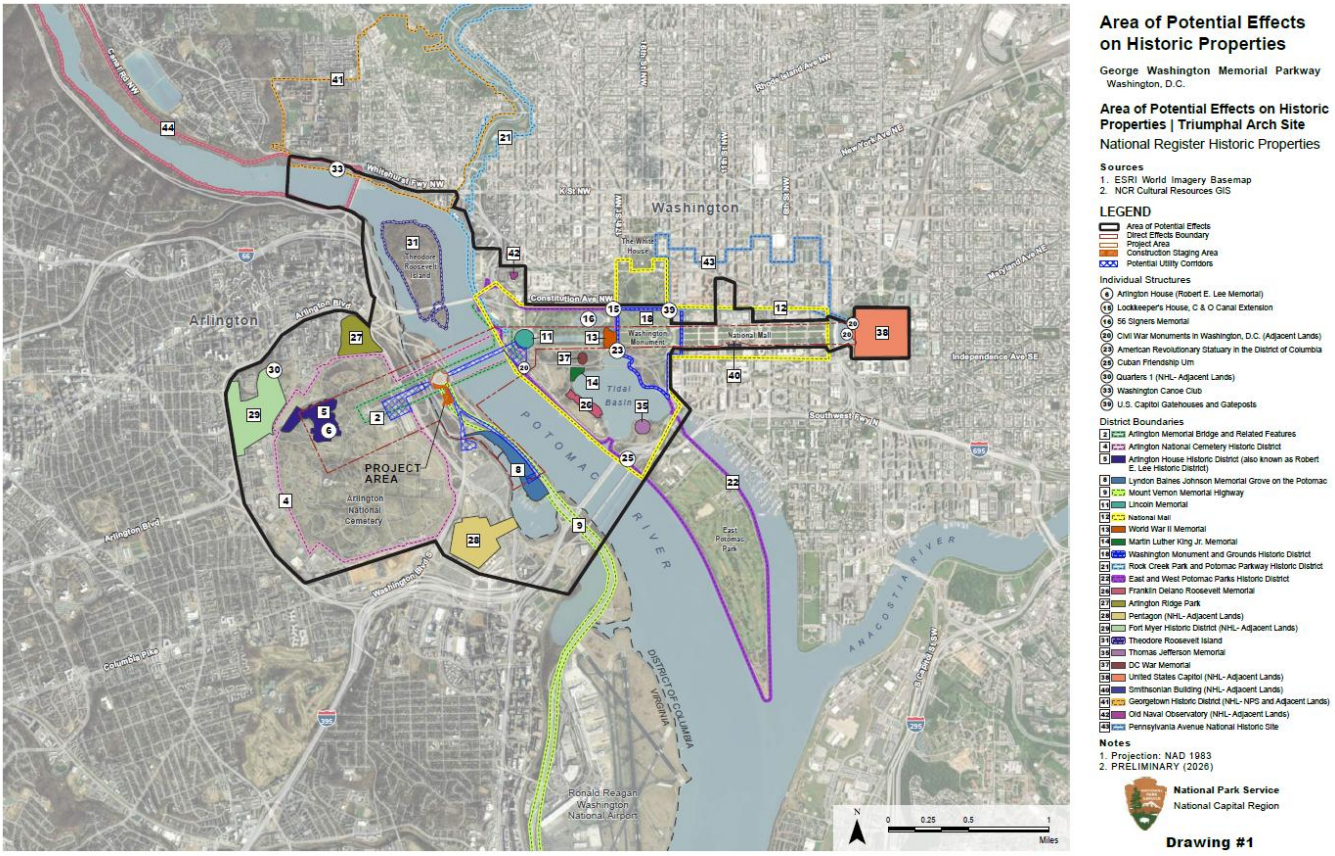
If you should have any questions or comments regarding any of these matters, please contact me at david.maloney@dc.gov or 202-442-8850 or Andrew Lewis at andrew.lewis@dc.gov or 202-442-8841.

Sincerely,

David Maloney
District of Columbia State Historic Preservation Officer

26-0593

DRAFT AREA OF POTENTIAL EFFECT



National Park Service
U.S. Department of the Interior

George Washington Memorial Parkway

June 2026

Triumphal Arch at Memorial Circle

Assessment of Effects Report

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1 Introduction

The National Park Service (NPS) is developing a design for the construction of a monumental arch, the Triumphal Arch (the Arch), within the George Washington Memorial Parkway in Washington, D.C. As a federal undertaking, this project is subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) "Protection of Historic Properties" (Section 106). This Assessment of Effects Report describes the project (the proposed undertaking) and analyzes potential adverse effects on historic properties, including archeological resources, within the project area. It is being prepared as part of the continuing consultation process between the NPS, the District of Columbia Historic Preservation Office (DC HPO), Virginia Department of Historic Resources (VDHR), Federally Recognized Tribes, and other consulting parties.

Section 106 consultation for the proposed undertaking is being initiated with DC HPO, VDHR, and other entitled consulting parties per 36 CFR § 800.2(c)(1) and (3). These parties are marked with an asterisk in the list below. Other stakeholders and interested parties were invited to participate in consultation per 36 CFR §§ 800.2(c)(5) and 800.3(f)(2). The list below also includes parties from which NPS has received a request to consult, which NPS is still considering. All consulting parties and stakeholders were contacted via letters dated June 5, 2026.

Consulting Parties

- District of Columbia Historic Preservation Office*
- Virginia Department of Historic Resources*
- Advisory Council on Historic Preservation*
- Absentee Shawnee Tribe of Indians of Oklahoma Nation
- Catawba Indian Nation
- Chickahominy Indian Tribe
- Chickahominy Tribe Eastern Division
- Delaware Nation
- Monacan Indian Nation
- Nansemond Indian Nation
- Pamunkey Indian Tribe
- Rappahannock Tribe
- Shawnee Tribe
- Upper Mattaponi Indian Tribe
- National Capital Planning Commission
- Commission of Fine Arts
- Arlington County
- District of Columbia – Ward 2

- Arlington National Cemetery
- Department of War
- The Trump-Kennedy Center
- National Park Service - National Mall and Memorial Parks
- National Park Service - Rock Creek Park
- National Park Service – National Capital Region National Historic Landscape Program
- Federal Highway Administration
- Architect of the Capitol
- Georgetown 2E ANC Commission

Other parties that have requested consulting party status

- National Trust for Historic Preservation
- Committee of 100 on the Federal City
- DC Preservation League
- The Cultural Landscape Foundation
- National Parks Conservation Association\
- American Institute of Architects

1.1 Description of Undertaking

1.1.1 Purpose and Need

The purpose of the proposed undertaking is to celebrate 250 years of American independence by honoring America's founding principles through installation of an arch at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage.

Arlington Memorial Bridge and Memorial Avenue serve as a ceremonial entrance to Washington, D.C. and the gateway to Arlington National Cemetery, physically and symbolically uniting the nation's history along a corridor already lined with monuments honoring diverse figures of American significance. Executive Order (EO) 14252, *Making the District of Columbia Safe and Beautiful*, directs the Secretary of the Interior to develop proposals to ensure federal buildings and lands uplift and beautify public spaces and generate in the citizenry pride in and respect for our nation, promoting beautification and the preservation of our history and heritage. Installation of an appropriate structure presents an opportunity to advance that directive within one of the most symbolically significant corridors in the Capital.

1.1.2 Proposed Undertaking

The proposed undertaking includes construction of the Arch within Memorial Circle, associated plaza and landscape improvements, supporting utility and stormwater infrastructure, traffic and pedestrian circulation modifications, security features, lighting, and temporary staging and laydown areas required for construction.

Appendix A contains plans, sections, and renderings of the proposed undertaking. These are for illustration purposes only and may not reflect the final design.

The Arch would be an approximately 250-foot-tall reinforced concrete structure clad in granite and ornamented by a central winged figure and two eagles, positioned above each Arch leg. Dimensions will be finalized during future design efforts. The following dimensions are current approximations. The principal architectural component would rise approximately 166 feet above finish grade, with surmounting statuary extending the total height to approximately 250 feet. The main footprint of the structure would be approximately 91 feet by 166 feet, with a 15,197-square-foot footprint at ground level. The maximum lateral projection at the upper cornice would extend to 107 feet 4 inches by 183 feet 4 inches. The structure would contain 70,072 gross square feet distributed across five levels: a ground level, two service mezzanine levels not open to the public, a gallery level, and an observation deck level. The observation deck would provide 9,812 square feet of exterior deck area at 161 feet 6 inches above grade.

The Arch would serve as a monumental architectural feature aligned with the axis between Memorial Avenue and the Arlington Memorial Bridge.

The Arch would be 166 feet wide with a 55-foot-wide opening, providing views from the observation deck to area landmarks.

The Arch would be built from concrete and finished with granite. The granite used for the Arch would be sourced from one of three quarries, located in Vermont, North Carolina, or California—depending on availability and desired color.

- Ground Floor Level: The ground level would contain security screening, back-of-house functions, and vertical circulation lobbies.

- Mezzanine Level: The mezzanine levels would contain mechanical and support spaces. The gallery level would contain exhibit space, back-of-house areas, restrooms, and vertical circulation lobbies, with the possibility of including a café and gift shop.

- Observation Deck: The observation deck level would include the vertical circulation lobby and exterior deck.

The Arch would include six stairways and five elevators. Two pairs of elevators in the north and south legs would serve the lower public levels, and a fifth elevator would serve the observation deck. Two large circular spiral stairs would connect the ground level to the gallery level; two

elliptical spiral stairs would connect the gallery level to the observation deck; and two egress stairs would connect all levels to dedicated exit-only doors at grade.

The proposed undertaking would also include site development within and immediately around Memorial Circle. A paved public plaza would surround the Arch inside the traffic circle. The plaza would be protected by a barricade seat wall generally located at the existing inner curb and by removable or retractable bollards at authorized vehicle access points. Exterior lighting would be installed to illuminate the Arch and plaza, and the undertaking would include minimal exterior signage, perimeter and rooftop security cameras, access-control systems for major doors and nonpublic areas, interior and exterior video surveillance, and a security screening area with walk-through magnetometers, x-ray equipment, and explosive trace detection equipment. Vehicle access to the plaza would be restricted to authorized maintenance, contractor, law enforcement, and emergency vehicles.

The Arch would be illuminated using a low spill, fully shielded lighting system designed to highlight the Arch. Illumination of the Arch would be supplemented by eight light stanchions, ranging from 14 to 20 feet in height, strategically located around the intersection. In addition, aviation required safety lighting would be incorporated into the design using the least intrusive technology available, ensuring compliance with aircraft visibility requirements while limiting unnecessary light emission.

Proposed Changes to Vehicle, Pedestrian, and Bicycle Use

During construction, temporary closures would be implemented, as follows:

- Westbound traffic from Arlington Memorial Bridge will be reduced to two lanes.
- Eastbound traffic from Memorial Avenue will not be able to turn northbound on Arlington Boulevard, and will be directed onto Arlington Memorial Bridge.
- Northbound traffic from Washington Boulevard will not be permitted into the circle, but will need to turn right onto Arlington Memorial Bridge.
- The sidewalk on the south side of the Circle would be temporarily rerouted to the north side.

Additional short-term closures and detours will be required at the beginning of the project to establish the maintenance of traffic configuration, during construction to accommodate utility installations, and again near the end of construction to complete final transportation-related elements.

Under the proposed undertaking, new traffic signals would be installed to control vehicle movements within and around Memorial Circle. The signalization plan would coordinate signal phases for all major vehicle approaches and activate pedestrian crossing phases through passive detection to ensure safe and efficient circulation for all users. These upgrades would replace

existing yield and merge conditions with full signal control. Signalization-related changes include:

- Full signalization of Memorial Circle and all pedestrian crossings
- Three coordinated signal groups at Washington Boulevard, Arlington Boulevard, and Memorial Avenue
- Eight new fully signalized pedestrian crossings accessing the center of the Circle
- Elimination of all existing yield and merge movements
- Pedestrian actuation and detection for walk phases that activate only when needed
- Dedicated signal phases for high-volume turning movements to minimize conflicts

The proposed undertaking would also include implementation of a series of physical modifications within and around Memorial Circle. These improvements would reshape roadway geometry, expand pedestrian space, and incorporate new materials and features that calm traffic and create safer conditions for people walking. Construction activities would include enlarging key median islands, converting existing pavement treatments to more durable and pedestrian friendly materials, and adjusting the circulating roadway to reduce speeds and better accommodate all users. Physical construction–related changes include:

- Enlarged median islands on the east and west sides of Memorial Circle
- Circulating roadway narrowed to approximately 20 feet
- Conversion of the pavement marked truck apron to a mountable concrete truck apron
- Replacement of existing Belgian block along the outer edge of the Circle with grass
- Recommended safety design features such as raised crossings, curb extensions, median refuge islands, reduced curb radii, and rumble strips
- Construction phase changes including closure of the southern half of the Circle, detouring two-way traffic to the north side, elimination of certain left turn movements, and temporary pedestrian routing with a new temporary crosswalk designed in compliance with the Americans with Disabilities Act and the Architectural Barriers Act, and meets the Public Right-of-Way Accessibility Guidelines incorporated into the Architectural Barriers Act Accessibility Standards.

The proposed undertaking would include designating a dedicated pickup and drop off area along Memorial Avenue to accommodate short-term loading and unloading and enhanced wayfinding to direct visitors toward designated safe crossings.

<u>Construction Phasing</u>

Construction of the Arch would occur in multiple phases over an approximately two-to-three-year period. Construction activities would generally proceed as described below.

Phase 1–Site Excavation (2–3 months). The initial phase would include site preparation, excavation within the construction footprint, and installation of temporary utilities. Temporary fencing, erosion and sediment control measures, stormwater management protocols, and staging areas would be established. Temporary pedestrian, bicycle and vehicle detours would be implemented.

Phase 2– Foundation and Support of Excavation (4–5 months). Following excavation, drill rigs would be mobilized to install the deep foundation system. Caissons would be installed to a depth of approximately 75 feet to reach bedrock. This phase would involve drilling and constructing reinforced concrete piles to support the future structure. Continuous heavy equipment operations would occur during this period.

Phase 3–Structural Concrete (10–11 months). After the foundation system is completed, crews would construct the primary structural components of the Arch. This phase would include use of tower cranes (up to 320 feet tall), forklifts, skid steers, and concrete pump systems to construct the vertical and horizontal elements of the Arch.

Phase 4–Precast Cladding (4–5 months). During this phase, the granite panels would be affixed to the Arch. Granite panels would be delivered from their source quarry and assembled on-site as the structure progresses. At the same time, work inside the structure would begin, including installing the stairs and elevators, starting the roofing system to make the building weather tight, and beginning major mechanical, electrical, and plumbing work.

Phase 5–Statue Placement and Ceiling Installation (5–6 months). Before the facade is fully completed, a scaffold system would be built to create a working platform to install the Arch ceiling panels. To install the statue, a 300’ tall mobile crane would be required to set and assemble the statue components. As the statue is constructed, a scaffold tower would need to be installed around it to facilitate access for connections, welding, and finishing of the statue. During these events, interior fit out would be concurrently running inside the Arch.

Phase 6– Site Hardscapes / Landscaping / Project Completion (6–7 months). At this phase, the project would be near completion. All the stone pavers and site walls would be set during this time, as well as the completion of any other landscape, hardscape, and stormwater management facilities. The interior features would be completed. The demobilization process would be underway and any construction related temporary traffic control would be removed. Permanent traffic changes, including changes to signalization, installation of crosswalks, etc. would be put in place.

Phase 7–Site Restoration and Demobilization (2 months). At the conclusion of construction, the contractor would remove temporary infrastructure, staging materials, and construction fencing.

Disturbed turf and landscape areas within NPS jurisdiction would be restored to preconstruction conditions.

Staging Areas

The construction staging footprint would encompass approximately 45,000 square feet immediately south of the project site, with an additional 80,000 square feet designated for parking and to minimize vehicular traffic obstruction. The staging area would be surfaced with geotextile fabric and six inches of stone to protect underlying soils. These areas would support equipment storage, material laydown, and construction trailers. After construction is complete these areas would be restored to their current condition and replanted. Tree removal is not anticipated at this time.

Utility Installation

To support operation of the Arch and associated facilities, new potable water, sanitary sewer, electric, gas and telecommunications utilities would be extended to the Memorial Circle area.

Utilities would be extended to the site using one or more of three anticipated utility corridors. Utilities would be routed through any single corridor or combination of corridors depending on engineering needs, construction feasibility, and coordination with existing infrastructure. Installation of utilities would occur over multiple construction phases identified above.

Utility corridors include:

- Connection from existing utilities near the Arlington National Cemetery Welcome Center, along Memorial Drive, and across the Boundary Channel Bridge or under the Boundary Channel by horizontal directional drilling (HDD)
- Connection from existing utilities near the Columbia Island Marina and near the Pentagon, along or within Washington Boulevard and George Washington Memorial Parkway
- Connection from existing utilities near the Lincoln Memorial, crossing underneath by HDD, within, or attached to the Arlington Memorial Bridge

Installation methods may include open trenching, HDD, embedding utilities within or beneath existing roadways and bridges, or affixing them to bridge structures, with final method selection occurring during subsequent design phases.

Stormwater Management Actions During Construction

During construction, stormwater and erosion control practices would be implemented across the construction site to minimize sediment transport and protect adjacent drainage systems and waterways. Perimeter controls would include installing silt fence or mulch socks along all site fencing to prevent runoff from leaving the disturbed areas. Stormwater and any accumulated

groundwater would be managed through a sediment treatment tank prior to discharge into the existing sewer system.

To protect inlets within and adjacent to the work zone, storm drains would be fitted with inlet protection devices. At primary site access points, a stabilized construction entrance would be established, consisting of a concrete apron paired with a 20-foot track of stone to remove sediment from vehicle tires before they enter public roadways. These measures are designed to provide effective sediment control, limit off-site impacts, and maintain compliance with applicable stormwater requirements.

Long-term Stormwater Management

Since the project would create approximately 62,875 square feet of new impervious surface, on-site stormwater retention is required under District of Columbia regulations. Preliminary estimates indicate a retention volume of about 6,300 cubic feet, with final calculations to be developed during detailed design and included in the stormwater management plan.

To meet these requirements, the project would incorporate perimeter bioretention facilities within the landscaped zones around the monument and within the traffic circle. These features would capture and treat runoff stormwater, reduce reliance on underground structures, and be designed with appropriate pretreatment, overflow, and underdrain components to meet standards developed in compliance with District of Columbia stormwater management regulations.

Groundwater and Dewatering Approach

Geotechnical investigations indicate that groundwater is located roughly 15 feet below the existing surface. As a result, only minimal dewatering would be required during construction. Water management efforts would focus on collecting shallow stormwater and surface water that accumulates in excavations. Small sump pumps would direct this water to a sediment treatment tank before it is discharged into the existing storm sewer system. Construction wastewater, expected to be minimal, would be contained and transported off-site for proper disposal, rather than discharged on site.

Soil Excavation

The project would require the removal of approximately 1,400 truckloads of existing soils and the import of roughly 400 truckloads of engineered fill. All construction vehicles would be staged within the designated south project staging lot, with loading and unloading occurring inside the project fence to reduce congestion on adjacent roadways. Daily trucking activity is anticipated to involve between 20 and 30 trucks, transporting an estimated 80 to 100 loads per day. Excavated soils would be transported to approved disposal facilities in Maryland or Virginia, contingent upon the results of in situ characterization and contamination testing.

Construction Equipment and Work Hours

Construction would require several tower cranes, forklifts, skid steers, drill rigs, and concrete pumping systems. Work would occur year-round, with work occurring in two 10-hour shifts per day (20 hours per day, year-round) for the duration of the construction period.

Road Closures and Transportation Routes

The south side of Memorial Circle is anticipated to remain closed for the majority of construction and will represent the primary transportation access impact during this time. To maintain traffic operations, eastbound traffic from Memorial Avenue will be shifted to the north side of the circle.

During this configuration, certain lower-volume movements will be temporarily restricted. Eastbound traffic from Memorial Avenue will not be permitted to turn northbound onto Arlington Boulevard and will instead be directed onto Arlington Memorial Bridge. Northbound traffic from Washington Boulevard will also be restricted from entering the circle and will be required to turn right onto Arlington Memorial Bridge. Westbound traffic from Arlington Memorial Bridge will also be reduced to two travel lanes.

During this time, pedestrian and bicycle access will be maintained through a short detour. This detour will include one additional crossing of two travel lanes, with a rectangular rapid flashing beacon installed to improve crossing visibility and support safer pedestrian and bicycle movements through the construction area.

Additional short-term closures and detours will also be required at the beginning of the construction to establish the maintenance of traffic configuration, and again near the end of construction to complete final transportation-related elements.

Construction deliveries and haul-off activities would primarily access the project site via I395 using Route 27, which provides the most direct and operationally feasible connection to the south project staging area. As a secondary option, U.S. Route 50 (Arlington Boulevard) may be used when needed, as it offers acceptable access for construction vehicles.

Daily construction trucking would involve approximately 20–30 trucks transporting an estimated 80–100 loads per day. To limit congestion and avoid impacts to public roadways, trucks would be staged within the south project staging lot and all loading and unloading activities would occur inside the project fence line. This approach would maintain safe traffic flow and reduce conflict points between construction vehicles and the surrounding transportation network.

Proposed Visitor Access and Visitor Facilities at the Triumphal Arch

Visitor use would be managed through a timed entry system, similar to the system used at the Washington Monument, which may be administered online, on-site, or through a combination of both. Visitors would arrive at their designated entry time, enter a queue, proceed to the screening area on the first floor of the Arch, and undergo security screening before entering the public area of the Arch.

After screening, visitors would enter the public area of the Arch and proceed to the mezzanine level by either the stairs or the elevator. The internal circulation system would allow visitors to access the mezzanine, which houses all visitor service functions, including exhibit space, a café, a gift shop, and public restrooms. Visitors may experience guided time and free time within the public area of the Arch and would be expected to depart by the designated exit time to maintain capacity for entry of additional visitors.

1.2 Historic Summary of the Project Area

The immediate project area is located within the Memorial Avenue Corridor cultural landscape, a nationally significant historic designed landscape extending between the Lincoln Memorial in Washington, D.C., and Arlington National Cemetery in Arlington, Virginia (see Figure 1 in Appendix B). The corridor consists of the Watergate Steps, the Rock Creek and Potomac Parkway Entrance, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue Bridge over Boundary Channel, Memorial Avenue, and the ceremonial entrance sequence into Arlington National Cemetery at the Arlington Hemicycle. Memorial Circle serves as the link between the Arlington Memorial Bridge and Memorial Avenue, providing a hub to secondary destinations and routes within a compressed urban geography. The circular travel pattern provides a scenic route for commuters to experience the Memorial Avenue Corridor. The entirety of the corridor forms a major component of the monumental core of Washington, D.C. and was conceived as both a ceremonial gateway to the nation's Capital and a symbolic landscape commemorating national unity and reconciliation following the Civil War.

The conceptual origins of the corridor date to the report of the 1901–1902 Senate Park Commission, commonly known as the McMillan Plan (U.S. Congress 1902), which proposed a monumental bridge and axial landscape composition linking the planned Lincoln Memorial with Arlington House, the former home of Robert E. Lee

The bridge alignment and associated ceremonial landscape were intended to physically and symbolically unite North and South through a coordinated monumental composition extending across the Potomac River. The corridor was designed principally by the architectural firm McKim, Mead & White under project architect William Mitchell Kendall and reflects the formal planning principles of the City Beautiful movement and Beaux-Arts monumental design.

Construction of the corridor occurred in phases between the 1920s and 1940s. Arlington Memorial Bridge was constructed between 1926 and 1932, while Memorial Avenue and associated bridge and landscape features were developed concurrently. The corridor was designed as a processional sequence integrating architecture, engineering, sculpture, transportation systems, vegetation, and expansive reciprocal views. Arlington Memorial Bridge established a new monumental crossing of the Potomac River and extended the east-west monumental axis of Washington westward toward Arlington National Cemetery and Arlington House. The corridor was conceived as an "Avenue of Heroes," with memorial niches and commemorative landscapes incorporated into the overall design framework.

Memorial Circle occupies a central and highly significant position within this composition. Located on Columbia Island, now Lady Bird Johnson Park, Memorial Circle forms the ceremonial hinge between Arlington Memorial Bridge, Memorial Avenue, the George Washington Memorial Parkway, and the Mount Vernon Memorial Highway. Early plans for the Columbia Island plaza envisioned a far more monumental treatment than the traffic rotary ultimately constructed. Designers centered a formal, cruciform plaza on the east-west axis of the avenue corridor and proposed two monumental columns offset in hemispherical transepts framing the corridor. The proposed column bases were 33.5 feet wide and tapered to fluted columns rising 166 feet in height topped with winged victory figures symbolizing the reunification of the North and South following the Civil War (see Figures 2 and 3 in Appendix B). Additional proposals included monumental pavilions, fountains, balustrades, Greek temples, and cross-axis roadway compositions before the design was gradually simplified through the 1930s into the existing traffic rotary configuration designed principally by landscape architect Gilmore D. Clarke.

Memorial Circle was ultimately constructed beginning in 1940 and was intended to function as a formal organizing landscape feature within the larger ceremonial composition extending between the Lincoln Memorial and Arlington National Cemetery. Four monumental pylons framing the entrances to Arlington Memorial Bridge and Memorial Avenue were among the principal architectural features implemented from the earlier McKim, Mead & White design concepts.

The landscape surrounding Memorial Circle evolved substantially during the mid-twentieth century. While early designs emphasized formal open spatial relationships around the rotary, the character of the surrounding landscape changed during implementation of the Beautification Program associated with First Lady Claudia “Lady Bird” Johnson during the 1960s. Landscape architect Edward Durell Stone, Jr. developed a planting plan for Columbia Island that introduced extensive plantings of flowering dogwoods, white pines, daffodils, and other vegetation around Memorial Circle and throughout Lady Bird Johnson Park. These plantings transformed the character of Memorial Circle from a largely open rotary into a more heavily framed and naturalistic landscape setting while maintaining the circle’s ceremonial and commemorative role within the larger corridor composition.

Today, the Memorial Avenue Corridor remains nationally significant for its architecture, landscape architecture, engineering, sculpture, and community planning associations, as well as for its symbolic role linking the Lincoln Memorial, Arlington National Cemetery, and Arlington House through a unified monumental landscape composition. Character-defining features include the axial organization of the corridor, ceremonial circulation systems, formal views and vistas, memorial landscapes, bridge and roadway structures, holly hedges and white oak plantings along Memorial Avenue, and the reciprocal visual relationships across the Potomac River between the monumental core of Washington and the Arlington landscape.

Consistent with these historical associations and design developments, the 2024 cultural landscape report (Frisbie et al. 2024) defines the period of significance for the Memorial Avenue Corridor as 1901–1979, and recognizes its significance at the national level under Criteria A (in the area of Politics/Government) and C (in the areas of Architecture, Engineering, Landscape Architecture, Art—Sculpture, and Community Planning and Development), and also Criteria Consideration F (Commemorative property) and G (property elements added within the last 50 years). This period of significance, and these areas of significance, encompass the initial conception and composition of the corridor as a commemorative and recreational landscape, the construction of the Arlington Memorial Bridge and other corridor features, and the fuller realization of the corridor's design through the installation of memorials and the landscape designs associated with landscape architect Edward Durell Stone, Jr.

2 Regulatory Framework

The National Historic Preservation Act (NHPA), enacted in 1966, is America's foundational historic preservation law. The overarching goal of this federal law is to preserve historic resources across the country by ensuring that federal agencies consider potential impacts to historic properties when planning, making decisions, funding, permitting, or conducting activities. While the NHPA does not mandate the preservation of historic properties, it acknowledges the importance of preserving our nation's diverse heritage and directs federal agencies to act as responsible stewards of historic properties. Two sections of the NHPA, Section 106 and Section 110, establish requirements for federal agency programs. For the purposes of this assessment, they will be used to evaluate the project's effects to historic properties.

Section 106 (discussed in Section 2.1) requires federal agencies to consider the effects of their actions, known as undertakings, on historic properties prior to the issuance of any license, permit, approval, or expenditure of federal funds. It also establishes that the Advisory Council on Historic Preservation (ACHP) must have a reasonable opportunity to comment on any federal agency undertaking. The goal of Section 106 is for federal agencies to integrate preservation values and public input into their planning and decision-making processes. Section 110 (discussed in Section 2.2) focuses on federal stewardship of historic properties. It sets out the broad federal historic preservation responsibilities and is intended to ensure that historic preservation is fully integrated into the ongoing federal agency programs. It also includes a specific provision for the protection of National Historic Landmarks (NHLs). Additionally, EO 14252 (discussed in Section 2.3) addresses the federal government's responsibilities to beautify and make safe and prosperous the District of Columbia.

2.1 Section 106

Section 106 of the NHPA (54 U.S.C. § 306108) requires federal agencies to take into account the effects of their actions on historic properties. The NHPA also created the ACHP and authorized the agency to issue regulations governing the implementation of Section 106. These regulations

are set forth in 36 CFR Part 800. The Section 106 process seeks to incorporate historic preservation principles into project planning through consultation between a federal agency and other parties with an interest in the effects of the federal agency's action on historic properties. Section 106 consultation includes four main steps: initiating consultation; identifying historic properties that could be affected by the undertaking; assessing the undertaking's effects on historic properties; and seeking ways to avoid, minimize, or mitigate any adverse effects on those properties.

Section 106 also includes special requirements for considering NHLs in the Section 106 process (36 CFR § 800.10). The regulations require the ACHP and the Secretary of the Interior to be invited to participate in Section 106 consultation whenever a project has an effect meeting the criteria of 36 CFR § 800.5(a)(1) on an NHL. Portions of the area of potential effect (APE) are within an NHL historic district, and Section 110(f) applies to this assessment of effects for the project (see Appendix D.)

2.2 Section 110(f)

Section 110(a)(2) of the NHPA (54 U.S.C. § 306102) requires agencies to establish preservation programs for the identification, evaluation, nomination, and protection of historic properties to the National Register of Historic Places (NRHP). The NPS maintains inventories for historic structures, archeological sites, and cultural landscapes that are listed, or eligible for listing, on the NRHP in the Cultural Resources Inventory System.

Section 110(f) of the NHPA (54 U.S.C. § 306107) also requires that federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect one or more NHLs. It requires that agencies "to the maximum extent possible undertake such planning and actions as may be necessary to minimize harm to the landmark."

2.3 Executive Orders

EO 14252, titled "Making the District of Columbia Safe and Beautiful," is a presidential directive aimed at improving Washington, D.C.'s public safety, appearance, and overall civic image through coordinated federal action. The order directs the Department of the Interior "to ensure Federal buildings or lands adequately uplift and beautify public spaces and generate in the citizenry pride in and respect for our Nation." Elements of the NPS's implementation of the EO include development and construction of beautification efforts such as restoring monuments, redesigning and rehabilitating public spaces, removing graffiti, upgrading parks and infrastructure, and enhancing the visual character of the nation's Capital. The EO emphasizes transformative improvements to D.C.'s landscape including creation of safer, greener, and more visually impressive public environments and monumental landscapes. The broader goal of the

EO is to position Washington as a Capital city that actively reflects national pride, historical significance, and a renewed investment in high-quality public spaces.

3 Area of Potential Effects

3.1 Guidance for Area of Potential Effect Development

The Section 106 regulations define an APE as "the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking" (36 CFR § 800.16[d]). The APE is defined to allow for the evaluation of potential effects to historic properties resulting from an undertaking.

According to the steps prescribed by the Section 106 regulations, the APE must be defined before the identification of historic properties and evaluation of potential effects occurs. Types of effects on historic properties may include the following:

- Direct (comes from the undertaking at the same time and place with no intervening cause; can be visual, physical, auditory, etc.)
- Indirect (caused by the undertaking that are later in time or farther removed in distance but still reasonably foreseeable)
- Temporary
- Future
- Cumulative

Adverse effects occur when an undertaking may directly or indirectly alter characteristics of a historic property that qualify it for inclusion in the NRHP. Examples of adverse effects are stated in 36 CFR § 800.5(a)(2). Adverse effects have the potential to occur both during the construction and operational periods of a project.

For each undertaking, the Section 106 regulations (36 CFR Part 800) require the lead federal agency to determine an APE boundary that considers multiple types of effects on historic properties, rather than multiple APEs that address various effects. However, non-contiguous APEs may be developed to include multiple alternative project areas or multiple areas where possible effects may be reasonably anticipated. The regulations also require the lead federal agency to seek information from consulting parties and others likely to have knowledge of, or concerns with, historic properties in the area, to identify issues relating to the undertaking's potential effects on historic properties.

The VDHR provides guidance on APE development, requiring the APE to include 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, etc. The DC HPO does not offer comparable guidance.

3.2 Area of Potential Effect Development

To begin developing the APE for this project, the NPS referenced the APEs developed for other recent federal undertakings that involved major construction and physical prominence in the Potomac River basin, including the rehabilitation of the Arlington Memorial Bridge, the Rehabilitation of the Lincoln Memorial, the rehabilitation of the Tidal Basin and West Potomac Park seawalls, and the Long Bridge Project. Reviewing the APE development and consultation process for these prior projects informed the drafting of the initial APE for this project by identifying considerations and analysis raised in prior efforts that are germane to the current proposed undertaking. Additionally, it allowed the NPS to consider consulting party input on those prior APEs that may also be relevant to the APE of this project.

To establish preliminary boundaries for the APE, aerial imagery basemaps in ArcGIS Pro and Google Earth were used to identify the general extents of potential construction and visual impacts. To inform the outer boundaries of the preliminary APE and identify critical study areas within it, the NPS analyzed photographs of important viewsheds, as well as architectural landscape renderings developed by the project's designers that overlay the proposed undertaking on those viewsheds. This analysis of APE outer extents considered areas of higher elevation (from which views would be more likely); major urban infrastructure (particularly elevated structures that would have a greater potential to block views); and other urban conditions like building density, street patterns, tree coverage, and potential viewsheds.

The NPS then used existing cultural resources GIS tools to identify, map, and list cultural resources within the APE. The NPS consulted data from the Cultural Resources Inventory System (CRIS), the Virginia Cultural Resources Inventory System (VCRIS), and the National Register Information System including nomination documentation held at the National Archives. Once the APE was drafted, the impacted resources were gathered using a selection-by-location tool in ArcGIS Pro. This geoprocessing tool allows a user to select resources from one set of layers (in this case the data layers containing data for the National Register, National Historic Landmark, CRIS-CL, and CRIS-HS programs) using a defined spatial limit (in this case the preliminary boundary for the APE).

3.3 Description of Preliminary Area of Potential Effects

The APE for this project encompasses the area in which the NPS anticipates that direct and/or indirect effects to historic properties are possible. Within the overall APE, the NPS has identified an "area of direct effects." This area includes the immediate proposed construction footprint, directly adjacent areas, and the primary ceremonial axis linking the Washington D.C. monumental core with Arlington National Cemetery.

The area of direct effects extends from Arlington National Cemetery in the west, across the Memorial Avenue Corridor to the Lincoln Memorial, and then along the length of the National Mall to the United States Capitol. In addition to those axial landscapes, it also includes adjacent and cultural landscapes including, generally from west to east: Arlington House, the Robert E. Lee Memorial, the entirety of the Memorial Avenue Corridor, Lady Bird Johnson Park, portions of Mount Vernon Memorial Highway, portions of the George Washington Memorial Parkway, the southern entrance of Rock Creek and Potomac Parkway, the Washington Monument and grounds, and the United States Capitol and grounds.

Beyond the area of direct effects, the APE extends farther to include places that are not expected to be directly affected by the undertaking but are potentially subject to indirect effects (the area of indirect effects). The outer bounds of the APE encompass Joint Base Myer–Henderson Hall to the west and from there, the boundary extends to the east to surround Arlington National Cemetery and Arlington Ridge Park. The boundary turns north before it reaches the bank of the Potomac River and parallels the riverbank upriver to a point north of Rosslyn. The boundary then crosses the river and encompasses the Georgetown Waterfront, continuing to the east to include the southern entrance of the Rock Creek and Potomac Parkway and the Lincoln Memorial and grounds. From the Lincoln Memorial, the boundary generally follows the northern side of the National Mall—with a jog northward to include the Old Post Office Tower—to the U.S. Capitol and Grounds, which mark the eastern end of the APE. From this eastern terminus, the APE boundary generally follows the southern side of the National Mall, extending in a line to the west until 15th Street SW, where it turns to the south to include the bridges from the waterfront to Hains Point. The boundary then extends southwest across the Potomac to a point north of Ronald Reagan Washington National Airport and there turns westward to encompass the Pentagon and curve north to surround Arlington National Cemetery, up to Joint Base Myer–Henderson Hall.

Appendix C contains the maps showing the APE and the historic properties within the APE.

4 Historic Properties within the Area of Potential Effects

The APE contains numerous overlapping historic properties; many resources contribute to multiple properties and districts. Historic properties include cultural landscapes, architectural resources, and archeological resources.

The historic properties within the portion of the APE designated as the area of direct effects are those that have the highest potential to be most significantly affected by the proposed undertaking. They consist of the main axial and compositional resources whose significance is fundamentally tied to the Memorial Avenue Corridor and the ceremonial landscape relationship between Arlington National Cemetery, the Lincoln Memorial, and rest of the monumental core of Washington, D.C. These resources collectively form an intentionally designed monumental landscape developed primarily during implementation of the McMillan Plan and associated early twentieth-century City Beautiful planning efforts. The significance of these properties derives

not only from their individual architectural or commemorative importance, but also from their spatial, visual, symbolic, and ceremonial interrelationships. Contributing characteristics shared among these resources include axial alignment, reciprocal views, coordinated transportation systems, monumental scale, formal landscape organization, and carefully framed transitions between the civic landscapes of Washington and the commemorative landscapes of Arlington National Cemetery. The proposed undertaking would occur directly within this designed ceremonial framework at Memorial Circle, along the primary axes that serve as the principal organizing features of the cultural landscape layout.

Additional resources that may be affected are those from which this proposed undertaking would be visible. The potential effects relate to possible changes to setting, viewsheds, and the broader spatial organization of the Potomac basin landscape. In particular, the Arch would introduce a new vertical feature into a landscape system historically characterized by carefully managed horizontal monumental compositions, open river-oriented views, and coordinated scenic parkway experiences. As a result, these resources should be evaluated for indirect effects related to visual prominence, altered landscape relationships, and changes to the historic character of the monumental river corridor.

4.1 Preliminary Identification of Historic Properties

Table 1 in Appendix D details the historic properties within the area of direct effects and Table 2 in Appendix D details the historic properties within the area of indirect effects. These tables include a listing of historic districts, cultural landscapes, and archeological sites within the APE, as well as contributing features and elements within them. These tables also detail the designation of the properties.

4.2 Archeological Resources

The NPS performed a Phase IA archeological assessment for Memorial Circle and the construction laydown area of the proposed undertaking (Appendix E). The assessment report concludes that these areas have moderate to high archeological sensitivity for intact precolonial and historic archeological resources beneath the existing twentieth-century fill. The assessment found that Memorial Circle and the anticipated laydown area are situated on an artificial landform created through dredge and fill deposition between approximately 1915 and 1927, with roughly 10 to 14 feet of fill overlying an earlier buried landscape of sandy clay, alluvial deposits, sandbars, shallow tidal flats, and floodplain settings associated with the Potomac River. The report explains that similar buried landscapes elsewhere in Washington, D.C. have yielded important archeological information dating from the precolonial period through the colonial era, and it concludes that the buried former land surface beneath the fill may retain intact archeological deposits.

Background research documented a substantial archeological context in the surrounding area. Within 1 mile on the Virginia side of the Potomac River, the archeological assessment identified 13 archeological resources, including the Arlington House Site (44AR0017), two NRHP-eligible sites, and several additional unevaluated or previously determined ineligible sites. The report also notes that the APE lies within the War of 1812 study area and near the core area associated with that conflict. Based on documentary research, environmental reconstruction, pedestrian reconnaissance, and review of preliminary geotechnical borings, the assessment concludes that the area around Memorial Circle would have offered attractive resources during the precolonial and early colonial periods and that the Arlington House waterfront was an important component of the nineteenth-century landscape. These factors support the conclusion that intact archeological deposits may be present beneath the fill despite the creation of the modern island landscape.

The archeological assessment was predictive in nature and did not include subsurface archeological excavation. It also notes an important limitation: at the time the assessment report was prepared, archeological and historic architectural site file information requested from the DC HPO had not yet been provided and was expected to be incorporated later. Accordingly, the report recommends additional archeological investigation if the proposed undertaking would disturb soils more than 10 feet below existing ground surface. Specifically, the report states that a Phase IB subsurface archeological investigation, including geoarcheological analysis, could be performed as necessary. In addition, an archeological assessment of the utility corridors under consideration is needed to identify the presence or absence of archeological resources in those locations. At this time, only one archeological site has been identified within a potential utility corridor—44AX0028 (Alexandria Canal)—but other known or unknown resources may exist.

5 Identification of Effects

Effects assessments are based on the criteria of adverse effect as defined in the ACHP regulations (36 CFR § 800.5), which are as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the 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 (36 CFR § 800.5(a)(1)).

Examples of adverse effects can include physical destruction or damage to all or part of a property; alterations, including restoration, rehabilitation, and repair that are inconsistent with the Secretary's Standards for the Treatment of Historic Properties and applicable guidelines; and

change of the character of the property's use or of physical features within the property's setting that contribute to its significance (36 CFR § 800.5(a)(2)).

To assess project effects, the NPS reviewed existing documentation on the history and significance of each property. With an understanding of each property's significance, characteristics, and integrity, the proposed alternatives were analyzed, and the criteria of adverse effects were applied. A finding of "no effect," "no adverse effect," or "adverse effect" is recommended for each historic property:

- No Effect: A finding of "no effect" signifies that the project would not affect the characteristics of the property that qualify it for NRHP listing.
- No Adverse Effect: A finding of "no adverse effect" per 36 CFR § 800.5(b) signifies that effect(s) would not alter a characteristic of a property that qualifies it for inclusion in the NRHP in a manner that would diminish the integrity of the property; it does not meet the criteria for adverse effect.
- Adverse Effect: A finding of "adverse effect" per 36 CFR § 800.5(a)(1) signifies that an effect(s) would alter a characteristic of a property that qualifies it for inclusion in the NRHP in a manner that would diminish the integrity of the property, according to the criteria for adverse effect.

Table 3 in Appendix D contains an assessment of effects of the proposed undertaking on NRHP-eligible or listed historic properties and is based upon the criteria of significance. Consistency with Section 110(f) is addressed in Table 3. A brief summary of the preliminary assessment of effects is provided below in Section 5.1.

5.1 Preliminary Assessment of Effect of Proposed Undertaking

The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1) within the Area of Potential Effects because it would alter, directly and indirectly, characteristics of those properties that qualify them for inclusion in the National Register of Historic Places. As reflected in the table, the undertaking would have effects meeting the criteria of 36 CFR § 800.5(a)(1) that change integrity of setting, design, feeling, association, and, in some instances, location by introducing visual, spatial, and physical changes that affect character-defining views, reciprocal vistas, circulation patterns, and designed landscape relationships.

The most substantial effects meeting the criteria of 36 CFR § 800.5(a)(1) would occur to the Memorial Avenue Corridor Cultural Landscape, Arlington Memorial Bridge, Lady Bird Johnson Park Cultural Landscape, Arlington National Cemetery Historic District, Arlington House Historic District, Arlington House (Robert E. Lee Memorial), Arlington House Cultural Landscape, Lincoln Memorial Cultural Landscape, the Lincoln Memorial, National Mall Site, National Mall Historic District, and The Mall Cultural Landscape, all of which derive

significance in part from their planned visual, commemorative, and spatial relationships across the Potomac River and through the monumental core.

Additional effects meeting the criteria of 36 CFR § 800.5(a)(1) would occur to the Washington Monument Structure, Washington Monument and Grounds Historic District, Washington Monument and Grounds Cultural Landscape, Rock Creek and Potomac Parkway Historic District, East and West Potomac Park Historic District, Arlington Ridge Park, Fort Myer Historic District and Quarters 1, George Mason Memorial, Thomas Jefferson Memorial Cultural Landscape, and potentially the Pentagon, where the undertaking would alter contributing views, settings, or designed relationships. In contrast, the table indicates that numerous other historic properties would not be adversely affected due to distance, topography, vegetation, orientation, or intervening development.

Accordingly, the undertaking meets the criteria of 36 CFR § 800.5(a)(1) because it would result in impacts to the integrity of historic properties through the alteration of character-defining visual and spatial relationships that contribute to their significance.

With regard to archeological resources, additional investigation may be needed to fully determine the effects of the undertaking. A subsurface investigation of Memorial Circle may be necessary to determine the presence or absence of deeply buried resources, and a survey of the potential utility corridor locations may be needed to identify resources within those areas. The results of these investigations, if necessary, will be used to determine whether the APE contains archeological resources that are eligible, or may be eligible, for listing in the NRHP, and whether the proposed undertaking will have adverse effects on these resources. A programmatic agreement will be developed for this project to define the continued consultation process for the identification and evaluation of resources, and the resolution of any adverse effects on NRHP-eligible archeological resources.

6 Avoidance, Minimization, and Mitigation Measures

During and prior to the design process, various smaller Arch heights were evaluated to avoid, minimize, or mitigate impacts on historic resources. The smaller Arch heights were ultimately dismissed because they would have had greater impacts on the cultural landscapes, specifically the views between the Lincoln Memorial and Arlington National Cemetery. The smaller designs fully obstructed this view, instead of framing it, and did not create any new viewing opportunities – by contrast to the proposed Arch, which would allow a less obstructed view through its central opening and provide new viewing opportunities. In addition, because the Arch is intended to celebrate 250 years of American independence, the smaller heights were not considered representative of this milestone, unlike the 250-foot Arch proposed in the undertaking.

To further avoid, minimize, and mitigate adverse effects on historic properties, several steps could be undertaken during the implementation of the project.

Once a consensus determination of adverse effect for the project has been reached, these steps would be agreed upon and negotiated during the development of a programmatic agreement (PA) with certain consulting parties.

Potential avoidance, minimization, and mitigation measures for the project's adverse effects under consideration in the draft PA include:

1. Viewshed and visual minimization: The NPS will continue to refine the design of the undertaking to minimize visual intrusion on historic properties within the APE.
2. Construction Management Control: The NPS will minimize temporary construction effects to historic properties from noise and vibration and visual effects using a variety of construction management techniques. Visual effects, noise, and vibration will be minimized to the extent practicable by providing appropriate screening between construction staging areas and cultural resources, limiting the size of construction staging areas, and/or locating them away from sensitive views and viewsheds.
3. Archeological Investigation: The NPS will continue identification and evaluation of archeological historic properties in accordance with 36 CFR § § 800.4 - 800.5 and following the findings and recommendations of the Phase IA Archaeological Assessment Report.
    a. Preconstruction Phase 1B Geoarcheological Investigations
    b. Archeological Monitoring and Documentation
4. Other measures related to documentation, interpretation, or other elements, to be determined in conjunction with the consulting parties as part of developing and finalizing the PA.

Literature Cited

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U.S. Congress, Senate Committee on the District of Columbia, and District of Columbia Park Commission. 1902. *The Improvement of the Park System of the District of Columbia*. Washington, D.C.: Government Printing Office.

Outlook

Review - Triumphal Arch

From Stidham, Tammy <Tammy_Stidham@nps.gov>

Date Tue 7/28/2026 5:11 PM

Bcc Sullivan, Diane <diane.sullivan@ncpc.gov>; Webb, Lee <lee.webb@ncpc.gov>; tluebke@cfa.gov <tluebke@cfa.gov>; Beasley, Joy <Joy_Beasley@nps.gov>; Porsia, Sara C <sara.porsia@sol.doi.gov>; Madello, Jennifer <Jennifer_Madello@nps.gov>; Nersesian, Jen T <Jen_Nersesian@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-Ielmini@nps.gov>; Hade, Adam C <adam.hade@sol.doi.gov>; Hoaglund, Jordan W <jordan_hoaglund@nps.gov>; sbatcheler@cfa.gov <sbatcheler@cfa.gov>; Lorin Farris <lfarris@arlingtonva.us>; mdurak@arlingtonva.us <mdurak@arlingtonva.us>; caitlin.e.smith36.civ@army.mil <caitlin.e.smith36.civ@army.mil>; sarah.y.koeppel.ctr@mail.mil <sarah.y.koeppel.ctr@mail.mil>; mfloca@kennedy-center.org <mfloca@kennedy-center.org>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; ExecSecretariat.FHWA@dot.gov <ExecSecretariat.FHWA@dot.gov>; kevin.rose@dot.gov <kevin.rose@dot.gov>; Imamura, Joseph <joseph.imamura@aoc.gov>

3 attachments (18 MB)

2026 07 28 Triumphal Arch - Historic Properties and preliminary assessment of effect tables.pdf; 2026 07 28 Triumphal Arch - Revised APE.pdf; 2026 07 28 Triumphal Arch - Viewshed Analysis.pdf;

NPS thanks you for your input during this consultation process regarding the proposed undertaking involving construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. This communication is to inform you that through consultation with all the requisite parties, a final APE and list of historic properties which may be affected by the proposed undertaking has been determined by NPS. Both determinations are attached to this email.

NPS is now applying the criteria of adverse effect to the historic properties within the APE in accordance with 36 CFR 800.5(a). NPS welcomes your thoughts on how it should do so.

Please note NPS made a preliminary finding of an adverse effect for this undertaking. A final finding of an adverse effect would require NPS to consult further to resolve the finding of an adverse effect pursuant to 36 CFR § 800.6. *See* 36 CFR § 800.5(d)(2). Consulting parties will have an opportunity to consult in the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties if an adverse effect determination is issued. *See* 36 CFR § 800.6(a). Accordingly, at this time, please focus your comments on applying the criteria of adverse effect on the listed properties as it will inform NPS in making the appropriate determination.

Please provide the requested input, in writing, by August 6, 2026. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Tammy

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United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
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IN REPLY REFER TO:

July 28, 2026

Mr. David Maloney
State Historic Preservation Officer
District of Columbia Historic Preservation Office
899 North Capitol Street, NE, Suite 7100
Washington, DC 20002
Dear DC HPO,

Dear Mr. Maloney:

Thank you for the District of Columbia Historic Preservation Officer's (DC HPO) letter dated July 24, 2026. DC HPO's provision of information about historic properties it believes to be within the preliminary Area of Potential Effects (APE) and beyond was of help to the National Park Service (NPS) in making the final determinations attached to this letter. Additionally, NPS incorporated suggestions from the Virginia Department of Historic Resources and other consulting parties when making such final determinations. Both final determinations are attached to this letter.

In addition to the expanded APE and list of identified historic properties which may be affected by the undertaking, NPS has attached information to this letter about the viewshed analysis conducted for this undertaking.

Regarding DC HPO's concerns of effects on identified historic properties, NPS will consult with DC HPO when applying the criteria of adverse effect on historic properties within the APE for this undertaking. Accordingly, NPS requests DC HPO provide its input regarding the application of criteria of adverse effect on the identified historic properties.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the 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. 36 CFR § 800.5(a)(1).

Examples of 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 part 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;

(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

(vii) 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).

NPS publicly provided a preliminary Assessment of Effects, which included a chart outlining NPS's thoughts as to the effects the undertaking may have on certain historic properties, on June 5, 2026. Through this Section 106 consultation, NPS has expanded the breadth of the APE and incorporated additional historic properties that were not considered by NPS in its preliminary APE. Now, since the complete list of historic properties that may be affected by this undertaking has been finalized by NPS, it is appropriate to consult with DC HPO regarding the effects on such historic properties. To aid DC HPO in its review, NPS has included the chart outlining NPS's thoughts as to the effects of the undertaking, supplemented by NPS's thoughts as to the effects of the undertaking on the recently included historic properties located within the expanded APE.

Please note NPS made a preliminary finding of an adverse effect for this undertaking. A final finding of an adverse effect would require NPS to consult further to resolve the finding of an adverse effect pursuant to 36 CFR § 800.6. *See* 36 CFR § 800.5(d)(2). Accordingly, NPS hereby requests that DC HPO and NPS negotiate the terms of a memorandum of agreement or programmatic agreement to resolve the finding of an adverse effect resulting from the undertaking since both parties agree a finding of no adverse effect is not appropriate for this undertaking. If this proposal is agreeable, NPS suggests an in-person or virtual meeting on August 6, 2026, to

begin resolution of the adverse effect under 36 CFR § 800.6. Please let NPS know if DC HPO can meet as soon as possible so NPS can fulfill its preparatory responsibilities.

In the alternative, NPS requests DC HPO submit comments regarding its assessment of effects on the identified historic properties by the same date, August 6, 2026. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Sincerely,

Jennifer T. Nersesian
Regional Director

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

July 28, 2026

Mr. Roger W. Kirchen
Director and State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, Virginia 23221

Dear Mr. Kirchen,

Thank you for the Virginia Department of Historic Resources's (VDHR) letter dated July 21, 2026. VDHR's provision of information about historic properties it believes to be within the preliminary Area of Potential Effects (APE) and beyond was of help to the National Park Service (NPS) in making the final determinations attached to this letter. Additionally, NPS incorporated suggestions from the District of Columbia State Historic Preservation Officer and other consulting parties when making such final determinations. Both final determinations are attached to this letter.

In addition to the expanded APE and list of identified historic properties which may be affected by the undertaking, NPS has attached information to this letter about the viewshed analysis conducted for this undertaking.

Regarding VDHR's concerns of effects on identified historic properties, NPS will consult with VDHR when applying the criteria of adverse effect on historic properties within the APE for this undertaking. Accordingly, NPS requests VDHR provide its input regarding the application of criteria of adverse effect on the identified historic properties.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the 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. 36 CFR § 800.5(a)(1).

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Please note NPS made a preliminary finding of an adverse effect for this undertaking. A final finding of an adverse effect would require NPS to consult further to resolve the finding of an adverse effect pursuant to 36 CFR § 800.6. *See* 36 CFR § 800.5(d)(2). Accordingly, NPS hereby requests that VDHR and NPS negotiate the terms of a memorandum of agreement or programmatic agreement to resolve the finding of an adverse effect resulting from the undertaking since both parties agree a finding of no adverse effect is not appropriate for this undertaking. If this proposal is agreeable, NPS suggests an in-person or virtual meeting on August 6, 2026, to begin resolution

of the adverse effect under 36 CFR § 800.6. Please let NPS know if VDHR can meet as soon as possible so NPS can fulfill its preparatory responsibilities.

In the alternative, NPS requests VDHR submit comments regarding its assessment of effects on the identified historic properties by the same date, August 6, 2026. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Sincerely,

Jennifer T. Nersesian
Regional Director

July 30, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

Dear Ms. Stidham,

Thank you for the materials sent to consulting parties to the Section 106 review of the Triumphal Arch project on July 28, 2026. As The Cultural Landscape Foundation (TCLF) prepares another set of comments (which follow on those of June 15, 2026, and July 18, 2026), it would be helpful to understand how the National Park Service (NPS) will address the Section 106 requirement to "seek ways to avoid, minimize or mitigate any adverse effects on historic properties."

Thus far, there has been one consulting parties meeting (June 15, 2026), to which TCLF and five other organizations seeking "consulting party" status were not invited; the invitation was ultimately extended on Jul 10, 2026. The June 15 meeting followed the initiation of a Section 106 review on June 5, *after* the project had received final design review from the Commission of Fine Arts (which did not see a final design). This appears to directly contradict the language of Section 106, as noted in 36 CFR § 800.1(a) "Purposes of the section 106 process": "The section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, **commencing at the early stages of project planning**." [emphasis added]

This inverted approach to the Section 106 is very disconcerting, but so is the astonishing fact that there was no design competition for what would be the second largest monument in the Monumental Core after the Washington Monument.

Had this review commenced at the "early stages of project planning," it would likely have dealt with the most appropriate site for the arch. But the process began *after* a site had been selected.

The "Assessment of Effects" previously published by NPS does not address either a no-build option or an alternative location option. Consequently, would you please tell us if NPS is considering either a no-build option or an alternative location option, or if those options have been foreclosed?

In addition, the due date for consulting party comments is August 6, 2026. As noted in your email: "Consulting parties will have an opportunity to consult in the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or

mitigate adverse effects on historic properties **if an adverse effect determination is issued.**" [emphasis added]

When will consulting parties and the public be told of NPS' "determination"?

According to 36 CFR § 800.5(b) "Finding of no adverse effect" and (c) "Consulting party review," following a no adverse effect determination, the D.C. State Historic Preservation Office and other consulting parties would have 30 days to notify NPS in writing of any disagreements with the determination. Accordingly, NPS "shall either consult with the party to resolve the disagreement, or request the Council to review the finding." According to 36 CFR § 800.5(c)(3)(i) "If the Council does not respond within the applicable time period, [NPS'] responsibilities under section 106 are fulfilled."

Please explain ow NPS would decide to "either consult with the party to resolve the disagreement, **or** request the Council to review the finding." [emphasis added]

It seems that if NPS chooses not to work with consulting parties and instead forwards the issue to the Advisory Council on Historic Preservation (ACHP), that if ACHP takes no action, the Section 106 process would be concluded. Is that a correct reading of how Section 106 could be implemented by NPS in this matter?

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

August 3, 2026
From: Stephen E Hammond, spokesperson for the Family Circle of descendants at Arlington house

To: Tammy Stidham, National Park Service Associate Regional Director – Lands and Planning

The National Park Service (NPS) has invited The Family Circle of Descendants at Arlington House to comment as a consulting party in the review of a proposed undertaking pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800. NPS has ask specifically for comments regarding knowledge of, or concerns with, historic properties in the area near the potential undertaking, and our thoughts on issues related to the potential undertaking's effects on such historic properties proposed undertaking involves construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC.

The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1). The undertaking would introduce a new permanent structure, associated hardscape, lighting, security elements, utility infrastructure, stormwater facilities, and traffic and pedestrian circulation changes into the Memorial Circle setting and would thereby alter characteristics of historic properties that qualify for inclusion in the National Register of Historic Places. In particular, the undertaking has the potential to impact the Memorial Avenue Corridor Cultural Landscape, Arlington Memorial Bridge and related features, Arlington National Cemetery, Arlington House, and other related historic properties within the area of potential effects. The undertaking would also introduce new visual elements not presently found within Memorial Circle and change physical features within the setting that contributes to the significance of the historic district and cultural landscape.

The Family Circle of Descendants at Arlington House comments on the Assessment of Effects

I, Stephen Hammond, submit these comments as the spokesperson and Official Representative for the Family Circle of descendants at Arlington House, a consulting party.

Known today as 'Arlington House, the Robert E. Lee Memorial', the National Park Service (NPS) has been dedicated to its mission of preservation and interpretation of the site since 1933. We urge NPS to formalize its preliminary assessment highlighting the adverse impacts of the proposed Triumphal Arch and conclude that a 'no-build' option is the best course of action.

Arlington House, built between 1802-1818, is listed on the Virginia Landmarks Register and the National Register of Historic Places for its complex history, the viewshed across the Potomac

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River and for its relationship and proximity to other monuments, memorials and historic sites. The NPS has the responsibility to honor and protect those designations. However, in 2026, NPS appears to be taking actions that will negatively impact the very historic site they are committed to protecting. This memorial would be negatively and irreparably impacted by the construction of the proposed Triumphal Arch.

The enslaved people who were brought to the site from Mount Vernon leveled the hilltop, made the bricks and provided the labor that constructed the Arlington House. Our ancestors were forced to modify the landscape that is now part of the Arlington House Historic Preservation District. The plantation house overlooked a fledgling capital city. Ancestors of our Family Circle, enslaved and free, lived, worked and died on this site. Between 1802 and 1861 Arlington House was the focal point of an 1,100-acre plantation. **Today, descendants see the Arlington House as a site of reflection and education through interpretation of its complete and complex history. It is a site of healing from the horrors of slavery as well as a site of inspiration for descendants of the enslaved and their enslavers. Instead of being divided, we are setting an example for our nation on how we can have difficult conversations and be better as a Family Circle.** The viewshed is an integral piece of this space. Together, Arlington House, the Arlington Memorial Bridge and the Lincoln Memorial are part of a pivotal piece of United States history. The connections and continuity between these sites should not be diluted or encumbered by an Arch constructed on the Memorial Circle. The intention of the architect was to unite the North and the South following the Civil War, with a view from the Lincoln Memorial across the Memorial Bridge over the Potomac to the former home of General Robert E Lee. That intention cannot be mitigated with any structure located between the two existing sites.

Compounding that historic use of land is the inappropriate takeover of land once used by indigenous tribes in the area for thousands of years. The proposed Arch certainly does not serve as a memory of triumph to this group of individuals. Instead and Arch of the sort proposed is yet another example of colonialism overtaking spaces historically used by and shared others. The Family Circle of descendants at Arlington House acknowledges the use of these lands by others and seeks to discontinue adding insult to injury by constructing an Arch on this land.

Over the last 175 years, the landscape at Arlington has been transformed, modified, repurposed and renamed numerous times. Each time, the voices of ancestors and descendants of Arlington House have been left out. The voices of citizens near and far have also routinely been left out of the conversation. The same is occurring again with plans for the proposed Arch project. Yes, a process for seeking public input and comment exists. But, will NPS and the Federal government listen? Will the law be followed? As descendants of Arlington House plantation, we have a unique connection to this space and a standing that should impact decision making.

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The decision to construct an Arch on the Memorial Circle traffic roundabout on the Virginia side of Arlington Memorial Bridge between the entrances to Arlington National Cemetery and the Lincoln Memorial is not only flawed and ill conceived, the decision disregards the concerns and the will of the citizens of the United States and some of the people who are most closely related to the land.

The National Park Service seems to be approaching this project as a foregone conclusion that the Arch should be constructed. The Family Circle of descendants at Arlington House vehemently disagree with this view. On the contrary, the NPS should have a 'no build' option. The Triumphal Arch should not be constructed.

There are many reasons this project is a bad idea. In your own assessment of effect of the proposed project, the NPS has documented that the proposed construction of the Triumphal Arch at Memorial Circle would result in negative effects on Arlington House (Robert E. Lee Memorial), Arlington House Historic District, Arlington House Cultural Landscape, Arlington National Cemetery Historic District, among many other historic properties meeting the criteria found in 36 CFR § 800.5(a)(1). The project would alter, directly and indirectly, characteristics that qualify the sites for inclusion in the National Register of Historic Places. Construction of an Arch would change the integrity of setting, design, feeling and association of the sites with one another. The visual, spatial, and physical changes would negatively affect character-defining views, reciprocal vistas, circulation patterns, and designed landscape relationships. The decision here is rather easy. The Arch should not be constructed on the Memorial Circle or anywhere else for that matter.

Undertaking this Triumphal Arch project will cause irreparable harm to historic sites and the space around them. As an agency that is dedicated to the preservation and interpretation of historic sites, it is inconceivable that this project would be approved without its merits being debated openly in a public forum.

The Family Circle of descendants at Arlington House urges the NPS to formalize its preliminary assessment highlighting the adverse impacts of the proposed Triumphal Arch on local historic sites like the Arlington House, the Robert E. Lee Memorial and conclude that a 'no-build' option is the best course of action.

DRAFT

The Family Circle of Descendants at Arlington House <u>comments on the Draft Programmatic Agreement</u>

I, Stephen Hammond, submit these comments as the spokesperson and Official Representative for the Family Circle of descendants at Arlington House, a consulting party.

ADD

WHEREAS, in email correspondence dated July 10, 2026, the NPS invited **The Family Circle of descendants at Arlington House** who have an interest in and a historic connection to the area affected by the undertaking, pursuant to 36 C.F.R. § 800.2(c)(2), about the project and invited them to be a Consulting Party.

ADD The Family Circle of descendants at Arlington House to the full list of Consulting Parties invited is provided in Appendix B, along with presentation materials from the consulting party meetings.

C. Viewshed and Visual Mitigation

1. The NPS shall continue to refine the design of the undertaking to minimize visual intrusion on historic properties within the APE to the maximum extent feasible. **[Note: maximum extent feasible needs to be agreed upon by consulting parties, up to and including a finding that any visual intrusion may be too much to proceed.]**
2. Measures to be considered shall include, as appropriate:
   [Note: the first item on this list should be the physical size and height of the proposed structure.]
   a. refinement of lighting intensity, direction, and shielding to reduce glare and spill;
   b. minimizing the visibility and visual dominance of security features and associated infrastructure;
   c. careful siting and design of utility enclosures, pump station features, and stormwater facilities;
   d. reduction or integration of signage, lighting, and site furnishings; and
   e. preservation or restoration of landscape features that support significant views and enhance the design landscape character.

ADD

5. Nineteenth Century Finds

Considering that land adjacent to the construction area was occupied by individuals enslaved on the Arlington House plantation in the 19th century, the NPS will notify The Family Circle of Descendants at Arlington House in the event that any resources are discovered and considered potentially eligible for the National Register of Historic Places. Notification will also be given should additional phases of archeological investigation pertaining to 19th century resources be necessary or identified in a Post Review Discovery.

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V POST-REVIEW DISCOVERIES

A. If newly identified historic properties, sites and/or features are discovered during construction or unanticipated effects on known historic properties are identified, the NPS will comply with 36 C.F.R. § 800.13. The NPS shall consult with DC HPO, VA SHPO, and, if applicable, Native American Tribes **and The Family Circle of Descendants at Arlington House** that may attach religious and/or cultural significance to the affected property, and shall develop and implement avoidance, minimization, or mitigation measures with the concurrence of DC HPO, VA SHPO, and if applicable, Native American Tribes and **The Family Circle of Descendants at Arlington House.**

B. Treatment of remains …..

ADD between items 2 and 3

For actions involving African-American human remains or burials, the The Family Circle of Descendants at Arlington House, the VA SHPO, and the DC HPO will be consulted to determine a treatment plan for the avoidance, recovery, or reburial of the remains.

DRAFT

Outlook

RE: [External] Review - Triumphal Arch

From Flis, Matthew <matthew.flis@ncpc.gov>
Date Tue 8/4/2026 4:29 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Webb, Lee <lee.webb@ncpc.gov>; Herr, Jamie <jamie.herr@ncpc.gov>; Sullivan, Diane <diane.sullivan@ncpc.gov>

Good Afternoon Tammy,

Thank you for providing NCPC staff the revised final APE, the preliminary assessment of effect table, and the visual analysis study for the proposed Triumphal Arch for review. We have reviewed the materials, and they appear thorough and complete. We do not have additional comments to provide on the materials at this time. If there is an opportunity to share any comments provided by the other consulting parties, that would be helpful. We look forward to continued consultation to resolve the finding of an adverse effect, as indicated in your email.

Best,
Matt

National Capital Planning Commission

Matthew J. Flis, AICP-CUD
Deputy Director | Current Planning Division
Main: 202.482.7200 | Direct: 202.482.7236
401 9th Street, NW | Washington, DC 20004
matthew.flis@ncpc.gov | www.ncpc.gov

From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Tuesday, July 28, 2026 5:11 PM
Subject: [External] Review - Triumphal Arch

NPS thanks you for your input during this consultation process regarding the proposed undertaking involving construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. This communication is to inform you that through consultation with all the requisite parties, a final APE and list of historic properties which may be affected by the proposed undertaking has been determined by NPS. Both determinations are attached to this email.

NPS is now applying the criteria of adverse effect to the historic properties within the APE in accordance with 36 CFR 800.5(a). NPS welcomes your thoughts on how it should do so.

Please note NPS made a preliminary finding of an adverse effect for this undertaking. A final finding of an adverse effect would require NPS to consult further to resolve the finding of an adverse effect pursuant to 36 CFR § 800.6. *See* 36 CFR § 800.5(d)(2). Consulting parties will have an opportunity to consult in the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties if an adverse effect determination is issued. *See* 36 CFR § 800.6(a). Accordingly, at this time,

please focus your comments on applying the criteria of adverse effect on the listed properties as it will inform NPS in making the appropriate determination.

Please provide the requested input, in writing, by August 6, 2026. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Tammy

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

Outlook

[EXTERNAL] RE: Review - Triumphal Arch

From Edward Stierli <estierli@npca.org>
Date Wed 8/5/2026 11:33 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Rachel Kenigsberg <rkenigsberg@npca.org>; Hoaglund, Jordan W <jordan_hoaglund@nps.gov>; Madello, Jennifer <Jennifer_Madello@nps.gov>

1 attachment (183 KB)
NPCA Triumphal Arch Section 106 Response 08052026.pdf;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Tammy,

Attached are NPCA's comments on the materials.

A few asks in there are time-sensitive, so flagging them here: we're asking for a consulting party meeting before any finding is issued, written invitations to veterans organizations and the stewards of the affected properties, and confirmation that NPS won't seek final NCPC approval on September 3.

Happy to talk any of this through by phone and help provide contacts of veterans organizations if needed.

Thanks,

Ed

Edward Stierli
Vice President, Government Affairs
National Parks Conservation Association
C: 202-961-6123 | estierli@npca.org | **npca.org**

Preserving Our Past. Protecting Our Future.

From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Tuesday, July 28, 2026 5:11 PM
Subject: Review - Triumphal Arch

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Please provide the requested input, in writing, by August 6, 2026. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Tammy

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

August 5, 2026

Tammy Stidham
Associate Regional Director, Lands and Planning
National Park Service, National Capital Region

Cc: Jordan Hoaglund, Priority Project Coordinator, National Park Service
Jennifer Madello, Superintendent, George Washington Memorial Parkway, National Park Service

RE: NPCA Comments on the Criteria of Adverse Effect, Proposed Triumphal Arch at Memorial Circle, George Washington Memorial Parkway

Dear Ms. Stidham:

On behalf of the National Parks Conservation Association (NPCA) and our more than 1.9 million members and supporters, we submit these comments regarding the revised Area of Potential Effects, the list of historic properties, the viewshed analysis, and the preliminary assessment of effects tables. NPS has asked consulting parties to focus on how it should apply the criteria of adverse effect, and these comments do that, while also renewing several requests we made in June that have not yet been answered.

We appreciate that NPS expanded the study area and ran a viewshed analysis after consulting parties and both State Historic Preservation Officers asked for one, and the resulting record is considerably more complete than what was circulated in June. It is also considerably more troubling, because NPS now maps 208 historic properties inside the Area of Potential Effects and finds that the Arch would adversely affect at least 37 of them, six of which are National Historic Landmarks, including the Pentagon, the Georgetown Historic District, and the United States Capitol. We do not agree that identification is finished or that the Area of Potential Effects is correctly drawn, and we stand by our objections to this project regarding congressional authorization and the environmental review.

I. The Record Now Shows Harm Across Nearly the Entire Monumental Landscape

The properties NPS has identified as adversely affected include the Memorial Avenue Corridor, Arlington Memorial Bridge, the Arlington National Cemetery Historic District, Arlington House and its landscape, Lady Bird Johnson Park, the Lincoln Memorial, the Washington Monument and its grounds, the National Mall Historic District, East and West Potomac Park, the Rock Creek and Potomac Parkway, the Jefferson Memorial, the George Washington Memorial Parkway, the United States Capitol, and the L'Enfant Plan of the City of Washington itself.

The tables state the central conclusion plainly, which is that the Arch would break the 160-foot height limit that has kept Washington a horizontal city and would displace the Lincoln Memorial as the western end of the National Mall. That is not damage to a single property but damage to the plan on which the city was built, and we agree with these findings and urge NPS to carry them into its final determination without watering them down. We would note as well that nighttime lighting is cited as a basis for adverse effect at more than two dozen properties even though no lighting plan and no nighttime rendering has been shared with consulting parties, which leaves NPS in the position of proposing to minimize an effect it has not yet described.

II. The Viewshed Analysis Understates the Harm

Running the analysis was the right call, and our concerns go to how its results are being used rather than to the decision to conduct it.

The study area stops too soon. NPS drew the line at 3.5 miles, citing highway guidance that treats 3 to 5 miles as the distant zone in which detail fades, but detail is not what matters here. A 250-foot lit structure in a city capped at 160 feet reads as a shape on the skyline, and shapes on the skyline carry a long way. The maps show the visible area running south along the Potomac right up to the study boundary, where it stops because the boundary stops rather than because the view does, and places outside that circle known for their views of the monumental core were never examined at all. Those include Frederick Douglass National Historic Site at Cedar Hill, a National Historic Landmark and a unit of the National Park System roughly four miles away, and the Alexandria Historic District, also a Landmark, downriver along the same corridor.

Part of the elevation data is missing. The viewshed summary explains that inside the Secret Service redaction zone, building and tree data were stripped out of the Washington elevation model, which is precisely the area around the White House, President's Park, and Lafayette Square, all of which came back with no adverse effect. NPS should disclose how large that gap is, identify which findings depend on data inside it, and verify those views in the field.

The trees were counted with their leaves on. Tree canopy data was used to erase portions of the visible area, but for roughly half the year those trees carry no leaves, and NPS applied that reasoning to exactly one property, the George Mason Memorial, while clearing both the DC War Memorial and Theodore Roosevelt Island on the basis of tree cover with no mention of season at all. The analysis should be rerun for winter conditions and the affected findings revisited.

The phrase "visible only from the rooftop level" is carrying too much weight. Dozens of no adverse effect findings rest on that single recurring sentence, yet the viewshed summary itself cautions that the model measured visibility from the top surface of each building, which may include terraces and observation decks, and that anyone relying on it should verify whether real vantage points exist there or whether upper floors have the view. No such verification appears anywhere in the materials, and several of the buildings dismissed this way have towers, terraces, and upper-floor views that are central to what they are and to why they were listed. NPS should not use a model to rule out effects when the people who built the model said it needed checking first.

Finally, there are no pictures. The tables make hundreds of judgments about what will and will not be visible without a single simulation from a defined vantage point, and consulting parties cannot give NPS useful advice about the criteria of adverse effect without them. We ask for simulations, in summer and winter and in daylight and darkness, from at least Memorial Circle, the Lincoln Memorial and the Watergate Steps, the portico at Arlington House, Sections 43 and 60 at Arlington National Cemetery, the Memorial Amphitheater and the Tomb of the Unknown Soldier, the Marine Corps War Memorial and the Netherlands Carillon, the World War II Memorial, the Martin Luther King, Jr. Memorial, the north steps of the Jefferson Memorial, the Pentagon's River Entrance Terrace, and Key Bridge. We also ask for the underlying data and for the name of the firm that prepared the analysis, or confirmation that it was completed by NPS staff.

III. Several Findings of No Adverse Effect Do Not Hold Up

World War II Memorial: NPS concluded that there would be no adverse effect because of distance and intervening vegetation and buildings, but there are no intervening buildings along this line. The memorial sits at the east end of the Reflecting Pool on the Mall's central axis, and its view west through the Lincoln Memorial toward Memorial Bridge and Memorial Circle was left open by design and is protected as a contributing view. Because the Arch would stand squarely on that line, this finding should be reexamined and potentially reversed.

Martin Luther King, Jr. Memorial: NPS reasons that the memorial's primary views run southeast to the Jefferson Memorial, which is true as far as it goes, but they also run northwest to the Lincoln Memorial, where a speech this memorial in part commemorates was delivered. The assessment evaluates one half of a sightline and dismisses the effect on that basis.

Franklin Delano Roosevelt Memorial: NPS finds that the Arch would not be visible from this memorial, while in the same set of tables finding an adverse effect to East and West Potomac Park on the express ground that the West Potomac Park riverfront would have direct views of it. Since the FDR Memorial sits on that riverfront, both findings cannot be correct.

DC War Memorial: This memorial was cleared on the ground that mature trees block long views to the west, with no mention of winter conditions, even though its listed contributing view looks north across the Reflecting Pool toward the axis on which the Arch would be built.

Theodore Roosevelt Island: The island was cleared because of heavy vegetation and the intervening Roosevelt Bridge, again with no seasonal analysis, notwithstanding that it lies directly across and slightly upriver from the project site.

Nearly every standalone memorial evaluated in the tables came back with no adverse effect, which is a striking pattern given that memorials are the property type whose meaning depends most heavily on where they face and what they look at. That result reads as a methodological assumption rather than a property-by-property judgment, and it should be revisited.

IV. Whole Categories of Harm Are Missing from the Assessment

Construction damage receives almost no attention, even though the maps show a construction staging area and utility corridors running across Memorial Avenue and Memorial Circle, through Lady Bird Johnson Park, over Memorial Bridge, into the Lincoln Memorial grounds, and east toward the Washington Monument and the Tidal Basin. Physical damage to a historic property is an adverse effect under the regulations, yet nothing in the tables analyzes what staging and trenching would do to the historic granite paving along Memorial Avenue and the granite islands at Memorial Circle, to the white pines at the four pylons, to the seawalls, or to the Boundary Channel. The tables observe in passing that some of these features should be retained without ever saying whether the design as proposed would retain them.

Archeology is absent entirely. Table 1 lists archeological sites inside the National Mall Historic District, but no survey, identification effort, or effect analysis appears anywhere in the materials, notwithstanding that a 250-foot structure requires deep foundations and the utility corridors would cross filled ground.

Effects that accumulate are also unexamined. The regulations require NPS to consider cumulative effects, and several federal projects are moving forward at once in this same landscape, including the National Garden of American Heroes in West Potomac Park, the East Potomac Golf Course conversion, changes to

the Lincoln Memorial Reflecting Pool, and construction at the White House. Each is being reviewed on its own terms, and no review anywhere accounts for the total.

How the place is used goes unaddressed as well. Nothing in the assessment considers what the Arch would do to Memorial Avenue's role as the route funeral processions take into Arlington, to traffic and circulation at Memorial Circle, to crowds and visitor use, or to the security perimeter a structure of this profile would require. Nor does anything address what floodlighting does to the character of a national cemetery after dark, even though lighting appears as a basis for adverse effect throughout the tables.

The cemetery analysis is also incomplete, since NPS examined Sections 43, 60, and 66 and no others. NPS should explain the basis for choosing those three and extend the analysis across the cemetery, with particular attention to Section 60, the Memorial Amphitheater, and the Tomb of the Unknown Soldier.

V. Veterans Organizations and Landmark Stewards Still Have Not Been Invited

We have raised this consistently, and it remains true today that no veterans service organization and no organization representing the families of those buried at Arlington is a consulting party in this review. NPS has concluded that the Arch would adversely affect the Arlington National Cemetery Historic District, Arlington House, the Memorial Avenue corridor along which the nation escorts its dead, Arlington Ridge Park and the Marine Corps War Memorial within it, Fort Myer, the Pentagon, and the National War College, and there is no remaining explanation for their absence from the table.

The regulations direct NPS to identify and invite groups with a demonstrated interest arising from their concern for a project's effects on historic properties, and no one fits that description better than the organizations representing the men and women commemorated in this landscape and the families who visit them. The same gap extends to the institutions that built, own, or care for the properties NPS now says would be harmed, several of which are private organizations that have never been told a federal project has been found to harm their property. We ask NPS to send written invitations to consult, and to document those invitations to the consulting parties, to organizations such as:

- Veterans service organizations, including The American Legion, Veterans of Foreign Wars, Disabled American Veterans, AMVETS, Paralyzed Veterans of America, Vietnam Veterans of America, Iraq and Afghanistan Veterans of America, and the Military Order of the Purple Heart;
- Organizations representing the families of the fallen and of those buried at Arlington, including Gold Star Wives of America, American Gold Star Mothers, the Tragedy Assistance Program for Survivors, and the Society of the Honor Guard, Tomb of the Unknown Soldier;
- The organizations that built and steward the affected memorials, including the Military Women's Memorial at the Arlington Hemicycle, the Vietnam Veterans Memorial Fund, the Korean War Veterans Memorial Foundation, Friends of the National World War II Memorial, and the Marine Corps Heritage Foundation;
- The owners and stewards of the Landmarks and other properties NPS says would be harmed, including the Protestant Episcopal Cathedral Foundation, Georgetown University, the George Washington University, the National Society Daughters of the American Revolution, the National Academy of Sciences, Tudor Place, Dumbarton House, the Washington Canoe Club, and the Embassy of the Kingdom of the Netherlands as steward of the Netherlands Carillon;
- Preservation and civic organizations, including the Arlington County Historical Affairs and Landmark Review Board, the Alexandria Board of Architectural Review, and the affected Georgetown, Foggy Bottom, and Arlington Ridge citizens associations; and

- Federally recognized Tribes, on a government to government basis, with that consultation documented to the consulting parties.

Please provide a roster of the current consulting parties and convene consulting party meetings.

VI. The Review Schedule and the Choice of a Programmatic Agreement Do Not Fit This Project

NPS transmitted the revised Area of Potential Effects, the property list, the viewshed analysis, and the effects tables at the end of the day on July 28 and asked for written comment by August 6, which is seven business days. That follows the ten days consulting parties were given in June to review the original assessment of effects and the draft agreement, a window to which both State Historic Preservation Officers objected at the time. Consulting parties are now being asked to advise on the application of the criteria of adverse effect to 208 historic properties, without a single consulting party meeting having been convened at any point in this review, without visual simulations, and without any written response to the comments and objections already filed. We ask NPS to extend the deadline by at least 60 days, to convene a consulting party meeting before any finding is issued, and to circulate a written response to the comments received to date.

We also question the decision to resolve this undertaking through a programmatic agreement. The regulations reserve that instrument for situations in which effects cannot be fully determined before approval, in which effects are similar and repetitive, in which multiple or complex undertakings are involved, or in which routine management activities are being covered. None of those descriptions fits a single structure in a single location whose effects NPS has just spent two months documenting in considerable detail. A memorandum of agreement is the appropriate instrument here, and the practical consequence of using a programmatic agreement instead is to defer the specifics of avoidance, minimization, and mitigation to a later stage that consulting parties may have little ability to shape.

We would also appreciate written confirmation that NPS does not intend to seek final approval from the National Capital Planning Commission at its September 3 meeting. Section 106 consultation plainly cannot be complete by that date, and final Commission action taken while consultation remains unfinished would prejudge the outcome the process is meant to protect.

VII. The Environmental Review Should Be Reopened

When NPS issued its Finding of No Significant Impact on June 18, it had not completed the identification of historic properties, had not drawn the Area of Potential Effects it now describes as final, and had not conducted the viewshed analysis that produced most of the adverse effect findings now before consulting parties. The finding also carried no mitigation. It is difficult to reconcile a conclusion of no significant impact with an administrative record that, six weeks later, documents adverse effects to 37 historic properties, six of them National Historic Landmarks, and with adverse effect determinations that NPS acknowledges it is still in the process of revising.

Because the environmental analysis and the Section 106 record have now diverged this far, we ask NPS to reopen the environmental review, incorporate the identification and effects work completed since June, and provide the public a further opportunity to comment on the analysis as revised. Our position remains that an environmental impact statement is warranted for a project of this scale and effect, but at a minimum NPS should withdraw the Finding of No Significant Impact and issue a revised environmental assessment that reflects what its own consultants have since found.

VIII. Alternatives Belong on the Table Now

NPS has taken the position that alternatives come later, during the resolution phase, but in practice that sequencing means avoidance never receives a serious look. The National Capital Planning Commission granted preliminary approval on July 9, design continues to advance, and consultation has been confined to describing damage, so that by the time the resolution phase begins, mitigation will be the only subject left to discuss.

Alternatives also bear directly on the finding NPS is preparing to make, since that finding depends on where the Arch would go. The District of Columbia State Historic Preservation Officer has identified other locations, including the vicinity of the Frederick Douglass Memorial Bridge, that would not produce these effects, and additional candidate sites are already listed in the Commission's Memorials and Museums Master Plan. An agency cannot reasonably determine whether harm is capable of being avoided while declining to examine the options that would avoid it.

We therefore ask NPS to develop and share with consulting parties, before it issues a finding, an alternatives analysis that includes the locations the District of Columbia State Historic Preservation Officer identified, the sites in the Memorials and Museums Master Plan, substantially smaller designs at the current site, other ways to mark the 250th anniversary that would not require a permanent monument in this landscape, and a no action alternative treated as a genuine choice.

For the reasons above, we urge NPS to:

- Carry the adverse effect findings for all 37 properties into the final determination, and reverse the findings of no adverse effect for the World War II Memorial, the Martin Luther King, Jr. Memorial, the Franklin Delano Roosevelt Memorial, the DC War Memorial, and Theodore Roosevelt Island;
- Extend the viewshed study area, rerun the analysis for winter conditions, disclose and correct for the missing elevation data, and verify in the field every finding that rests on rooftop-only visibility;
- Provide visual simulations from the vantage points listed above, a lighting analysis covering nighttime effects, and the underlying viewshed data;
- Analyze construction and utility damage, complete an archeological survey, and account for the effects that accumulate across the other federal projects now proposed in this landscape;
- Invite veterans service organizations, Gold Star and survivor groups, the stewards of the affected memorials and Landmarks, and preservation and civic organizations to consult, and complete government to government consultation with federally recognized Tribes;
- Extend the comment deadline by at least 60 days, convene a consulting party meeting before any finding is issued, and circulate a written response to the comments received to date;
- Resolve this undertaking through a memorandum of agreement rather than a programmatic agreement, and confirm that final National Capital Planning Commission approval will not be sought on September 3;
- Reopen the environmental review, withdraw the Finding of No Significant Impact, and provide a further public comment opportunity on a revised analysis, or prepare an environmental impact statement; and
- Develop and share a genuine range of alternatives, including the locations the District of Columbia State Historic Preservation Officer identified, before issuing a finding, and identify in writing the statutory authority NPS believes permits this project.

NPCA remains ready to be an engaged and constructive consulting party. The record NPS transmitted on July 28 is an improvement in transparency, and it documents a project whose effects reach nearly every place that gives this capital its character, including the ground where the nation buries its fallen. That record should shape the decision rather than follow it. Thank you for your consideration.

Sincerely,



Edward Stierli
Vice President of Government Affairs
National Parks Conservation Association
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Washington, DC 20001

Outlook

Re: Review - Triumphal Arch

From Smith, Kathryn G <Kathryn_Smith@nps.gov>
Date Wed 8/5/2026 3:27 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Campbell, Patrick <J_Patrick_Campbell@nps.gov>

Tammy,

Thank you for the providing the updated documents and viewshed analysis for the Triumphal Arch proposed for Memorial Circle in the George Washington Memorial Parkway. Below are the NHL Program's comments on the material provided.

1. Generally, I agree with the findings of effect. Here are a few modifications I recommend:
    a. Reassess - Healy Hall, Georgetown University – the arch may be visible from the tower: See historic photo: georgetown-view-1908-1200.jpg (1200×909)
    b. Revise - National War College NHL – I think the views here would be too distant and likely filtered through mature trees on Hains Point/East Potomac Park, thus I recommend no adverse effect.
    c. Reassess - The Pan American Union Building has a large upper-level balcony facing west. It's just under the rooftop level, so it's possible there would be visibility from there to the Arch.

2. It would be useful to include the map numbers for each property addressed in the evaluation of effects table.

3. The following corrections are needed in the Tables:
    a. Table correction: #83 – Davidson Building – is not an NHL
    b. Table correction: Remove entry #99 – Founders Library at Howard U isn't a stand-alone NHL – it's part of the Andrew Rankin Memorial Chapel, Frederick Douglass Memorial Hall, and Founders Library district listed under #52.

4. Viewshed Analysis:
    a. "In the Washington D.C. DSM, all data returns were removed from the dataset within the United States Secret Service redaction boundary except for ground points and water points." Does this mean visibility from this area is not depicted on the map? How did NPS come to conclusions about visibility of historic properties in this area?

Thank you for the opportunity to provide input.

Best,
Kathryn

From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Tuesday, July 28, 2026 5:11 PM
Subject: Review - Triumphal Arch

NPS thanks you for your input during this consultation process regarding the proposed undertaking involving construction of a Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. This communication is to inform you that through consultation with all the requisite parties, a final APE and list of historic properties which may be affected by the proposed undertaking has been determined by NPS. Both determinations are attached to this email.

NPS is now applying the criteria of adverse effect to the historic properties within the APE in accordance with 36 CFR 800.5(a). NPS welcomes your thoughts on how it should do so.

Please note NPS made a preliminary finding of an adverse effect for this undertaking. A final finding of an adverse effect would require NPS to consult further to resolve the finding of an adverse effect pursuant to 36 CFR § 800.6. *See* 36 CFR § 800.5(d)(2). Consulting parties will have an opportunity to consult in the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties if an adverse effect determination is issued. *See* 36 CFR § 800.6(a). Accordingly, at this time, please focus your comments on applying the criteria of adverse effect on the listed properties as it will inform NPS in making the appropriate determination.

Please provide the requested input, in writing, by August 6, 2026. Please direct any questions or comments to Tammy Stidham, Associate Regional Director – Lands and Planning, at 202-619-7474 or tammy_stidham@nps.gov.

Tammy

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
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DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
Neighborhood Services Division – Historic Preservation Program
2100 Clarendon Boulevard, Suite 700, Arlington, VA 22201
TEL 703.228.3830 www.arlingtonva.us

Memorandum

To: Tammy Stidham, Associate Regional Director, National Park Service (NPS)

Date: August 6, 2026

From: Mical Durak, Historic Preservation Program (HPP), CPHD

Subject: HPP Feedback on Expanded APE and Viewshed Study and Applying Criteria of Adverse Effects

Thank you for reaching out to seek input on the datasets provided as well as how National Park Service (NPS) should apply the criteria of adverse effect to the historic resources that will be impacted by this proposed undertaking. Please see below for Arlington County's Historic Preservation Program's (HPP) comments:

Feedback on the Updated Area of Potential Effects, Identified Historic Resources, and Viewshed Study:

- HPP staff appreciate the expansion of the Area of Potential Effects (APE) to include a 3.5-mile radius around the project area given the significant height of the proposed arch. We also appreciate the additional consideration taken regarding the viewshed and the potential visual impact of this project on historic resources in both Arlington County and Washington, D.C.
    - However, it was unclear if this viewshed analysis accounted for different times of the year, and therefore, varying levels of vegetation. For example, was the estimated viewshed impact evaluated during the summer, when there is more vegetation, and the winter, when there is less? If this was considered, HPP staff suggest addressing the full methodology in the "Viewshed Analysis Summary" provided.
    - Additionally, the maps shared with the HPP note the APE inconsistently. On one, it is noted as the Study Area, whereas on others it is noted as the APE. Please clarify.
- We request that locally significant historic resources that are eligible for the National Register of Historic Places (NRHP), located within the APE, be included in the datasets presented and analyzed for impact. That information can be accessed through Arlington County's GIS mapping systems, and we are happy to provide greater information and coordination with information gathering concerning these resources upon request.
- Furthermore, HPP notes that an analysis of impact on archaeological resources located in the expanded APE must be completed. This data was not included in the information most recently shared. We look forward to reviewing that data in the future and note that it

is necessary for the provision of comprehensive comment and assessment of the impact of this proposed project.

- HPP staff found the datasets presented lacking in some clarity. For example, it was unclear if "Table 1: Historic Properties within the Area of Potential Effect, Adjacent and Overlapping the Project Area" corresponded only with the resources that were included in the viewshed of the project or all historic resources located within the APE. This should be addressed more clearly; if it is the latter, then it appears that data is missing from the table. Furthermore, the corresponding map for that table set should be noted as it was unclear which map HPP staff should review while reviewing the data presented in the table.
    - HPP staff also strongly suggest that these tables include a column for the address of each historic resource or that the table be split between resources located within Arlington County, Virginia and Washington, D.C.
- In "Table 2: Historic Properties within the Area of Potential Effect," HPP staff request a detailed explanation of this dataset, and which map corresponds with it. Furthermore, there were several resources for which a "Contributing Views/Vistas" was "Not identified." For example, this was the case for the Arlington Heights Historic District and the Penrose Historic District, both of which are in Arlington County. What does "not identified" mean? HPP staff request this be addressed in future iterations of the table.
- HPP staff suggest that NPS outline exactly the parameters they are utilizing for determining adverse effect, particularly for those resources that will experience an adverse visual effect. Providing clearly defined terms and insight into the methodology behind these determinations will be helpful to the public and to consulting parties when reviewing those determinations. For example, in "Table 3: Assessment of Adverse Effects," several of the resources have a note that "the proposed undertaking would only be visible from the rooftop level, and therefore, views to and from the resources would not be adversely affected by the proposed undertaking" which resulted in a determination that "no adverse effect [would be] anticipated." How was this standard applied to properties with other potential views impacted by the project? When determining viewshed with human scale in mind, is NPS considering only the facades of historic resources or secondary elevations too? Is it considering the public right-of-way only? Providing meaningful comment on this undertaking requires clearer guidance, defined terms, and an understanding of the proposed methodology.
- Finally, HPP staff reserve our final opinion about whether we concur with the suggested effects findings for the historic resources located within the APE for when that finalized data is presented to all consulting parties.

Feedback on How to Apply Criteria for Adverse Effect:

- Since making the determination of adverse effect for historic resources located within an APE is the responsibility of the federal agency managing the Section 106 process for a proposed undertaking, HPP staff, as a consulting party, did not apply the criteria of adverse effect on the 200+ listed properties as requested by NPS. We look forward to reviewing NPS's determinations of effect when that final data is presented. We do concur with NPS's preliminary finding of an adverse effect and welcome participating in future

conversations about how to mitigate or minimize that adverse effect to the historic resources in the APE.

- However, as requested by NPS, HPP staff does have guidance for NPS on how to apply the criteria of adverse effect to the listed historic properties in the APE:
    - Considering both the direct and indirect impact of an undertaking on historic resources is essential to determining adverse effect. For several resources in the APE, this proposed undertaking would have a direct and permanent physical and visual impact whereas others would experience a more indirect visual or atmospheric impact. Other aspects to consider include the potential for the proposed undertaking to physically destroy or partially damage historic properties, for the proposed undertaking to introduce alterations to a historic district that do not match the Secretary of the Interior's Standards for Rehabilitation, and for it to introduce a change to the property's physical setting or environment.
    - As NPS is aware, considering the seven aspects of integrity is also critical. For many resources located directly in the project area, their setting, design, feeling, and association could all be altered by this proposed undertaking and therefore, would impact that historic resource's ability to convey its historic significance.
    - Finally, NPS needs to consider the atmospheric and noise effects of this proposed undertaking. By NPS's estimation, the construction of the triumphal arch could last for two to three years. The noise and atmospheric effects from the construction of the arch would impact the historic resources in the APE for the duration of construction as well as the tenure of the structure itself. Those impacts will spread to areas outside of the immediate project area. Transportation modes and traffic around Memorial Circle will be significantly impacted by this proposed construction project. This will result in an increase in traffic to other parts of Arlington County and Washington, D.C. – as such, those areas will likely experience an increase in traffic noise, pollution, and other effects from increased vehicle traffic and roadway usage.

In conclusion, HPP staff would like to reiterate that the requested deadline for comments on this specific topic does not follow standard protocols and has impacted our ability to provide a comprehensive response. As with the past two engagements with consulting parties, it does not follow the standard Section 106 process. Requesting that consulting parties "apply the criteria of adverse effects on the listed properties" also strays from the standard Section 106 process. This attempts to shift the responsibility of the federal agency managing the Section 106 process for a proposed undertaking; therefore, we require further clarity as to exactly what NPS is requesting of Arlington County as a consulting party.

We welcome future opportunities to meaningfully engage in the Section 106 process for this undertaking in the future.



Mical Durak
Historic Preservation Principal Planner

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

David L. Bulova
Secretary of Natural and Historic Resources

Roger W. Kirchen
Director

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August 6, 2026

Ms. Jennifer T. Nersesian
Regional Director, National Capital Region
National Park Service
5300 Wellington Branch Drive, Suite 100
Gainesville, Virginia 20155

Re: Triumphal Arch at Memorial Circle
Arlington, Virginia
DHR File No. 2026-4065

Dear Ms. Nersesian:

The Department of Historic Resources (DHR) has received from the National Park Service (NPS) a request for comments regarding their revised Area of Potential Effects (APE), viewshed analysis, and assessment of effects for the proposed undertaking. At this time, it is DHR's opinion that NPS has not met the requirements under 36 CFR § 800.4 to identify historic properties. NPS has not addressed a majority of DHR's prior comments in our letters dated June 15, July 2, and July 21 or any comments received from consulting parties and the public. While DHR continues to agree that the undertaking, as proposed, will adversely affect numerous historic properties, it remains DHR's opinion that finalizing a determination of effect in accordance with 36 CFR § 800.5 is premature.

Alternatives

NPS has not addressed DHR's comments from June 15 and July 2 regarding the consideration of alternatives to avoid and/or minimize adverse effects to historic properties. DHR reminds the NPS of the expectation in 36 CFR Part 800 that the review of an undertaking will evaluate a broad range of alternatives in the consideration of potential effects to historic properties. The National Historic Preservation Act (the Act) in 54 US Code § 306107 also obligates the NPS to the maximum extent possible undertake such planning and actions as may be necessary to minimize harm to National Historic Landmarks (NHLs). Has the NPS considered alternate locations and/or designs for this project to avoid or minimize effects? Has NPS considered a no-build alternative to avoid adverse effects to historic properties? Has NPS addressed the comments from DC Historic Preservation Office (DCHPO) regarding alternate locations to avoid effects to the nationally significant properties, including adversely affected NHLs, within the current APE for this undertaking?

The NPS is obligated, per the Act 54 USC § 306102 (b), to ensure that:

> *"historic propert[ies] under the jurisdiction or control of the agency [are] managed and maintained in a way that considers the preservation of their historic, archeological, architectural, and cultural values in compliance with section 306108 of this title and gives special consideration to the preservation of those values in the case of property designated as having national significance;"*

NPS has jurisdiction and control over both this undertaking and many of the adversely affected historic properties in the APE. Absent a meaningful consideration of alternatives, **is authorizing this undertaking as proposed consistent with the Federal Agency's expectation for the management of historic properties under their jurisdiction and for giving special consideration to the preservation of the values that make these properties nationally significant?** These adverse effects can be avoided while still achieving the goal of commemorating our Nation's 250th anniversary of Independence.

APE and Identification Efforts

While NPS has failed to provide an explicit response to the issue of alternatives, the intent of the Federal Agency to proceed with the undertaking as proposed is clear. As such, DHR will provide the following additional comments regarding the undertaking as currently proposed. DHR has received the additional information provided regarding the basis for the, now expanded, APE for the undertaking. DHR acknowledges that NPS has added an additional seven (7) properties in Virginia to their assessment of effects. The additional information fails to address DHR's comments in our July 21 letter regarding reasonably foreseeable effects from long term changes in the use of the areas, including air, vehicular, and pedestrian traffic changes resulting from the construction of the proposed arch. NPS has only addressed additional viewshed impacts in this revised submission not other potential effects.

As DHR has stated in our June 15, July 2, and July 21 letters, the NPS has **still failed** to meet the expectations in 36 CFR § 800.4 (b) (1) to make a reasonable and good faith effort to carry out identification of historic properties, defined in 54 US Code § 300308 and 36 CFR § 800.16 (l) to include not just properties listed in the National Register of Historic Places (NRHP) but also those properties that are eligible for inclusion in the NRHP. NPS has not identified any properties beyond those listed in the NRHP, including the numerous properties already recorded in DHR's V-CRIS database as eligible for listing, in their identification and evaluation and as such **their identification efforts are incomplete. Any assessment of effects prepared by NPS fails to meet the expectation of Section 106 of the Act to consider effects to historic properties, again not just NRHP listed properties, and is likewise incomplete.**

Consulting Parties and Public Comments

While NPS has invited additional consulting parties and provided them with this most recent assessment of effects from July 28, the newly invited parties have not been provided all of the information shared with SHPOs and they have been asked to restrict their comments to the assessment of effects. The input of consulting parties has not been sought regarding the definition of the Area of Potential Effects and the identification efforts nor have they been afforded the opportunity to comment broadly on the undertaking as a whole. The consulting parties were offered a similarly constrained time frame to review the 70 pages of information provided on July 28. This does not meet the purpose and intent of consultation to under 36 CFR Part 800 to seek, discuss, and consider the views of consulting parties in the Section 106 review process.

DHR reiterates our requests from our August 4 email. DHR requests that the NPS provide information to DHR and DCHPO about their efforts to engage in consulting parties. DHR requests that consulting parties be provided sufficient time to review the hundreds of pages of documents prepared thus far for this undertaking. DHR would also like to review the public notice comments NPS has received regarding this undertaking so that we, as Virginia SHPO, can understand the comments expressed by citizens of the Commonwealth of Virginia regarding this project.

Please contact me at samantha.henderson@dhr.virginia.gov or (804) 482-6088 to continue consultation on this undertaking.

Sincerely,



Samantha Henderson, Director
Review and Compliance Division

August 6, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement

Dear Ms. Stidham,

Thank you for the opportunity to comment on the proposed Triumphal Arch that would be built at the western terminus of Memorial Bridge. These comments complement those filed by The Cultural Landscape Foundation (TCLF) on June 15, 2026, and July 18, 2026, and register the foundation's **very strong opposition** to siting a Triumphal Arch in Memorial Circle for the reasons cited below.

The process for the selection and siting of the Triumphal Arch has been horrifically flawed from the outset. Remarkably, there was no design competition, which is a dangerous and radical decision for what would be the second largest monument in the Monumental Core after the Washington Monument. It also flies in the face of decades of established and respected precedent. Instead, a concept that has been shopped around for more than 25 years and is the basis for a similar though smaller arch in Atlanta, according to *The Washington Post*, was simply put forth.

In addition, the Section 106 review was not initiated until June 5, 2026, *after* the project had already received final design approval from the U.S. Commission of Fine Arts (CFA) on May 21, 2026. For context, the Section 106 review generally is initiated before a project goes to the CFA for design review so that the early planning phase of Section 106 to identify historic properties and assess potential visual or physical effects can inform the conceptual designs that are later presented to the CFA (equally troubling is the fact that the CFA's approval was given *without* the commissioners seeing final designs). Had the process begun early, informed deliberations over the appropriate site could have been had; instead, both the design and the site were announced with great finality. Again, this is radical departure from a well-established series of processes that have made the Monumental Core a global paragon of civic art, landscape architecture, architecture, and planning.

To date there has been only one "consulting parties" meeting, on June 15, 2026, to which TCLF and five other organizations were not invited to participate until weeks after the meeting, on July 10, 2026. And no other meetings are scheduled. TCLF does wish to highlight this part of an email of July 28, 2026, from NPS, concerning at least one condition for a future meeting: "Please note NPS made a preliminary finding of an adverse effect for this undertaking. A final finding of an adverse effect would require NPS to consult further to resolve the finding of an adverse effect pursuant to 36 CFR § 800.6. *See* 36 CFR § 800.5(d)(2). Consulting parties will have an opportunity to consult in the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties **if an adverse effect determination is issued**. *See* 36 CFR § 800.6(a)." [emphasis added]. The word "if" suggests there is uncertainty about whether an "adverse effect determination" would be made. Given the extensive documentation of adverse effects in the preliminary finding, the suggestion that any uncertainty exists about the final determination is both confounding and alarming.

The same email also directs consulting parties to focus comments "on applying the criteria of adverse effect on the listed properties as it will inform NPS in making the appropriate determination." For the record, TCLF concurs with extensive body of adverse effects that have been listed in the National Park Service (NPS) document 2026 07 28 Triumphal Arch - Historic Properties and preliminary assessment of effect tables.

TCLF also wishes to note NPS' failure to respond to the foundation's letter of July 30, 2026, concerning whether the agency, as it addresses the Section 106 requirement to "avoid, minimize or mitigate any adverse effects on historic properties," is considering either a no-build option or an alternative location option, or if those options have been foreclosed.

At 250-feet-tall, the arch would be a significant addition to the Monumental Core, which stretches from the U.S. Capitol Grounds to Arlington National Cemetery, and includes the White House Grounds and the National Mall. The proposed arch interrupts and severs key visual and spatial relationships that are integral to the Monumental Core's design intent and its inherent symbolism, discussed below, and which have been stewarded by NPS for more than a century. This is acknowledged in the Assessment of Effects (AOE): "the undertaking meets the criteria of 36 CFR § 800.5(a)(1) because it would result in impacts to the integrity of historic properties through the alteration of character-defining visual and spatial relationships that contribute to their significance."

The AOE also states: "The NPS has determined that the proposed construction of the Triumphal Arch at Memorial Circle would result in effects on historic properties meeting the criteria found in 36 CFR § 800.5(a)(1) within the Area of Potential Effects because it would alter, directly and indirectly, characteristics of those properties that qualify them for inclusion in the National Register of Historic Places. As reflected in the table, the undertaking would have effects meeting the criteria of 36 CFR § 800.5(a)(1) that change integrity of setting, design, feeling, association, and, in some instances, location by introducing visual, spatial, and physical changes that affect character-defining views, reciprocal vistas, circulation patterns, and designed landscape relationships."

Shockingly, in response to this overwhelming list of adverse effects, there is no credible attempt at avoidance. The construction of an arch at this scale and in this specific location is treated as *a fait accompli.* Moreover, the proposed minimization and mitigation efforts barely register as token gestures as their collective impact will do little to deter the extraordinary adverse effects that would result from this undertaking and undermine the spirit of the Section 106 consultation process.

The *Guidelines for the Treatment of Cultural Landscapes,* for which I was the primary author during my fifteen-year tenure (1992-2007) as Coordinator of the Historic Landscape Initiative at the National Park Service, includes a section on "Spatial Organization and Land Patterns" that is clear about what is and is not recommended:

- **Recommended:** "Identifying, retaining and preserving the existing spatial organization and land patterns of the landscape as they have over time."
- ***Not* recommended:** "Allowing spatial organization and land patterns to be altered through incompatible development or neglect."

A 250-foot-tall arch in Memorial Circle sited between the Lincoln Memorial and Arlington National Cemetery and Arlington House and in the Monumental Core is *undeniably incompatible development*. Moreover, the draft Programmatic Agreement states in Stipulations 1.B.1.: "The Undertaking will be

consistent with … the *Secretary of the Interior's Standards and Guidelines for the Treatment of Cultural Landscapes …"* The Arch as proposed *will not* be consistent with the *Guidelines* and any certification otherwise would not only be factually baseless (in short, a lie), but declaring so would be unprofessional, fraudulent, and, perhaps, illegal.

We concur with the remarks of June 15, 2026, from District of Columbia State Historic Preservation Officer David Maloney:

> "Avoidance efforts in typical Section 106 reviews of new memorials usually begin with the evaluation of a range of possible locations. Since a memorial honoring our country's 250th anniversary appears to have no relationship to Memorial Circle and would be inconsistent with Memorial Avenue's symbolic view corridor, the arch could conceivably be constructed at other locations. However, the AOE suggests no consideration was given to any other sites, including the two ceremonial gateways suggested by the U.S. Commission on Fine Arts (CFA) for additional memorials, specifically Pennsylvania Avenue, SE near the Sousa Bridge and South Capitol Street near the Douglass Bridge, or any of the sites identified in the National Capital Planning Commission's Memorials and Museums Master Plan. While a large memorial on these sites could result in adverse effects, all adverse effects are not equal. The "most substantial" adverse effects of the proposed site could be avoided if the arch were constructed in a location that did not significantly diminish the important reciprocal views that symbolize the reunification of the country after the Civil War or visually compete with the Lincoln Memorial."

Also of great concern is the lack of Congressional authorization to ensure compliance with the Commemorative Works Act (40 U.S.C. §§ 8901–8909), and the Height of Buildings Act (Pub. L. 61-196, 36 Stat. 452 (1910), as amended, Pub. L. 113-103, 128 Stat. 1152 (May 16, 2014)) and 40 U.S.C. § 8106.

The introduction of a monumental arch in Memorial Circle—and its impact on historic visual and spatial relationships—would create a terrible precedent and would radically alter more than a century of a carefully orchestrated and stewarded legacy of the internationally recognized landscape architecture, architecture, civic art, and planning that contribute to the significance of the capital city's Monumental Core. There are two critical benchmarks in Washington, D.C.'s landscape legacy—Pierre L'Enfant's plan of 1791 and the McMillan Plan of 1902. The latter was devised by a distinguished group that included the landscape architect Frederick Law Olmsted, Jr.

Olmsted, Jr.'s impact on the development of the capital city is exceptional. Along with the McMillan Commission, he was a member of the first CFA in 1910, and served until 1918; he was the principal author of the Organic Act that created NPS (which manages much of the city's Monumental Core), a member of the first National Capital Park Commission (1924-26) and National Capital Parks and Planning Commission (1926-32), both predecessors to the current National Capital Planning Commission, and the principal designer of the White House Grounds plan of 1935, which has guided work on those grounds for more than 90 years. The CFA's website notes: "Olmsted Jr.'s work of many decades on the National Mall created a unified spatial composition from a sequence of disconnected landscapes."

According to NPS' Cultural Landscape Report (CLR) of 1999 for the Lincoln Memorial and West Potomac Park, "Olmsted exercised a unique influence over the development of the Lincoln Memorial grounds, serving as arbiter of design decisions regarding all aspects of the treatment of the

landscape." In addition, "Layout, spatial relationships, planting, and site features were often conceived, shaped, and reviewed by the landscape architect member of the commission prior to approval by the full commission."

Visually connecting the Lincoln Memorial to Arlington National Cemetery is Memorial Bridge described in the National Register of Historic Places nomination (1980) as "Washington's most beautiful bridge"; it was designed by William Mitchell Kendall, a partner at the architectural firm McKim, Mead & White. Earlier bridge designs include one from 1886 by Paul Pelz that "featured Renaissance Revival Towers and articulated steel arches crossing the Potomac River," and competition winning design from 1899 by Edward Pearce Casey that included "Triumphal Arches on piers [that] emphasized an imperial architectural image" as noted in *Civic Art: A Centennial History of the U.S. Commission of Fine Arts* (p. 107).

Indeed, as part of the current campaign to get the proposed Triumphal Arch built, its proponents have circulated images of those aforementioned Memorial Bridge designs and others from the late nineteenth and early twentieth century that include arches and other tall vertical elements.

All those proposals were ultimately rejected; to argue that they prove an arch was predestined is fallacious, at best, and deliberately misleading. Similarly, the suggestion that L'Enfant called for the construction of one or more arches in the city is based on a curious and inventive interpretation of a letter between L'Enfant and Thomas Jefferson in 1791. L'Enfant said no such thing.

According to NPS, the present Memorial Bridge was "Symbolically … designed to show the strength of a united nation by joining a memorial on the north side of the Potomac River (the Lincoln Memorial) with one on the south (Arlington House, the Robert E. Lee Memorial)." The architect envisioned an elaborate sculptural program … including seated figures of the first four American presidents on the D.C. side and reclining statues of oceans and river gods on Columbia Island. The bridge itself was to have forty allegorical statues." That entire sculptural program was eliminated by the CFA, as some statuary and pylons were seen as too tall in relation to the memorial.

The Lincoln Memorial is a hinge point (on a bent axis) visually connecting the Washington Monument and the Reflecting Pool to the east, and Arlington House. The Historic American Engineering Record report of 1988 about Arlington Memorial Bridge by historian Elizabeth Nolin noted: "As the final link in the chain of monuments which start at the Capitol building, the Arlington Memorial Bridge connects the Mall in Washington, D.C. with Arlington National Cemetery in Virginia. Designed to connect, both physically and symbolically, the North and the South, this bridge, as designed in the Neoclassical style, complements the other monumental buildings in Washington such as the White House, the Lincoln Memorial, and the Jefferson Memorial."

The arch would permanently interrupt the intentional visual and symbolically significant connection between the Lincoln Memorial and Arlington House, along with that between the Eternal Flame and gravesite of John F. Kennedy and the Lincoln Memorial. It would also mean that during solemn memorial services (interment and inurnment ceremonies held dozens of times each day) that visitors would be visible frolicking on the Arch's roof top observation deck.

Some 110 years ago, Olmsted, Jr. wrote a letter to Secretary of War Newton D. Baker concerning the proposed Memorial Bridge design; his sage observations are apt today: **"The existing bridge design**

was the result of a competition held about 1899, before the Lincoln Memorial was even dreamed of… [emphasis added]

"The bridge plans were carefully studied by members of the so-called Park Commission of 1900, of which I am the sole survivor. As a result of that study certain recommendations about them were made an essential part of our general plan. Among other things we said:

"Such modifications would call for the removal of the central ornamental towers, which would conflict with the proposed Lincoln Memorial."

"**These towers are the most conspicuous feature of the design and are so large and elaborate as to compete with the Lincoln Memorial** not only in an artistic sense but in point of cost. To eliminate them from the design would involve its complete restudy as an artistic problem. **Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part."** [emphasis added]

Washington, D.C. derives its significance from an unrivaled built legacy that has stood the test of time, thanks in large measure to the authenticity of the review processes of various commissions and governmental agencies that engage the public and subject experts as "consulting parties" offering a seat at the table in the Section 106 process. As the 2012 exhibition *Unbuilt Washington* at the National Building Museum noted, "The physical character of Washington, D.C., that we take for granted today is the unique result of countless decisions, debates, successes, failures, reconsiderations, missed opportunities, and lucky breaks."

Historically, the arch was never built and the cultural landscape in which it is being forced upon derives its significance from the high degree of integrity associated with its inherent visual and spatial relationships, which are a hallmark of its historic design that has been stewarded for multiple generations. *The Secretary of the Interior's Standards for Restoration* lists ten standards including number ten: "Designs that were never executed historically will not be constructed." Shouldn't that foundational *Standard* be the starting point for any Section 106 conversation?

TCLF strongly objects to siting the Triumphal Arch in Memorial Circle and urges NPS and the monument's supporters to either find an alternative site that does not create the extensive catalogue of adverse effects associated with its siting in Memorial Circle or abandon the project.

Feel free to contact me with any questions and thank you for your consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

Cc:
David Maloney, State Historic Preservation Officer, District of Columbia

August 6, 20206

Tammy Stidham, Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
tammy_stidham@nps.gov

Dear Tammy:

I am writing to express the DC Preservation League's (DCPL) comments on the most recent Assessment of Effects (AOE) issued by the National Park Service for comment. The AOE correctly identifies that this structure will inflict severe, irreversible adverse effects on more than 200 historic properties and cultural resources across the nation's capital. Furthermore, the project directly flouts federal statutory height restrictions.

The Adverse Impacts to Historic Sites include irreparable losses to the viewshed and permanent damage to the sacred visual axis connecting the Lincoln Memorial, Arlington Memorial Bridge, Arlington House, and Arlington National Cemetery. In addition, over 200 historic sites—stretching as far as the Washington National Cathedral—suffer compromised integrity of setting and feeling from this out-of-scale insertion. DCPL believes that there is no Programmatic Agreement or mitigation measure that can adequately minimize this structure, which violates the very nature of the National Park Service's mission, and will violate the Height of Buildings Act of 1910.

The Height of Buildings Act of 1910 is a comprehensive, standalone statute enacted by Congress on June 1, 1910. It is an independent regulatory framework, not a mere procedural tweak or amendment dependent on the narrower 1899 statute cited by applicants attempting to bypass caps. The 1910 Act explicitly limits all buildings and structures in the District of Columbia. At 250 feet, the proposed arch nearly doubles the legal ceiling authorized by Congress.

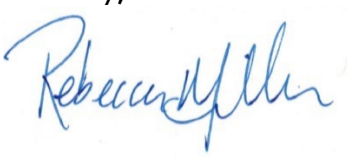
The Executive Branch, the National Capital Planning Commission, or the National Park Service cannot unilaterally waive or reinterpret a century-old statutory height limit enacted by Congress to reshape the DC skyline.

The National Park Service is violating its core mandate to conserve park scenery, natural and historic objects, and wildlife, while ensuring public enjoyment in a way that preserves resources for future generations. Sacrificing the integrity of more than 200 historic resources for a single project is not in the best interest of the NPS or the public. NPS is also attempting to amend, for its own purposes, a federal law enacted in 1910 that has shaped the very character of Washington, DC. This change will precipitate the unraveling of more than 120 years of careful planning and design, intended to ensure that our Nation's Capital retains its identity as a city defined by landmarks, neighborhoods, and a celebrated skyline unlike any other in the world. It's not too late to change direction, and we urge you to do so.

1328 Florida Avenue NW| Washington, DC 20009 | T: 202.783.5144 | dcpreservation.org
Fay Armstrong, *President* | Greta Fuller, Vice *President* | Howard S. Berger, *Treasurer* | Melissa Cohen, AIA, LEED AP, *Secretary* | John DeFerrari, *At Large*
Jill S. Cavanaugh, FAIA, AICP | Scott DeMartino, Esq. | Katie Irwin, AIA, IIDA, LEED AP | Constance Lai, FAIA, NCARB, LEED AP BD+C | Rob McClennan, AIA
D. Peter Sefton | James W. Shepherd, AIA, LEED | Joseph E. Taylor, AIA | Benjamin L. Williams, Esq., LEED AP | Juliet Zucker

Finally, let's stop calling this a proper Section 106 process. The Consulting Parties, who were denied initial party status, know what the general public may not; there is nothing normal about how this consultation is taking place – no avoidance, no minimization, no mitigation – just adverse impacts on the whole of our federal city. Trying to convince anyone otherwise is just insulting to those of us who have participated in these undertakings in good faith for decades.

Sincerely,



Rebecca Miller
Executive Director

Outlook

[EXTERNAL] National Mall Coalition comments on Triumphal Arch

From Judy Feldman <jsfeldman86@comcast.net>
Date Thu 8/6/2026 3:34 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Madello, Jennifer <Jennifer_Madello@nps.gov>; Hoaglund, Jordan W <jordan_hoaglund@nps.gov>; david.maloney <david.maloney@dc.gov>; rnelson@achp.gov <rnelson@achp.gov>

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August 6, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, D.C. 20242

Via email: tammy_stidham@nps.gov

Dear Ms. Stidham:

I write on behalf of the National Mall Coalition ("Coalition").

The Coalition strongly supports consideration of alternative sites for the Triumphal Arch currently proposed at Memorial Circle within the George Washington Memorial Parkway in Washington, DC. As the recent National Park Service analysis concludes, the Arch as now proposed could "Adversely Affect" 37 nearby historic sites. These sites are more meaningful than ever, and deserving serious discussion in the Section 106 public review process, in this year we celebrate the 250th anniversary of the United States.

One alternative site is on South Capitol Street, as suggested recently by DC Historic Preservation Officer David Maloney. Another site is Barney Circle, a location identified in 2000 for a millennium arch by Rodney Mims Cook, Jr., now Chair of the US Commission of Fine Arts.

Another alternative worthy of consideration is to construct a temporary arch. The Arc de Triomphe in Paris began as a temporary wooden mock-up. The Washington Arch in New York City also began as a temporary plaster and wood structure; when it proved a success, only then was the permanent stone arch constructed.

A temporary structure alternative could be erected before the end of 2026 while also providing the needed time for thoughtful and lawful analysis for the best site, size, and form for a permanent monument to honor our country's founding that enhances the beauty and meaning of our capital and the National Mall.

Sincerely,

Judy

Judy Scott Feldman, PhD
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Ms. Jennifer Madello, NPS - jennifer_madello@nps.gov
Mr. Jordan Hoagland, NPS - jordan_hoaglund@nps.gov
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Outlook

[EXTERNAL] National Mall Coalition comments on Triumphal Arch

From Judy Feldman <jsfeldman86@comcast.net>
Date Thu 8/6/2026 3:34 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Madello, Jennifer <Jennifer_Madello@nps.gov>; Hoaglund, Jordan W <jordan_hoaglund@nps.gov>; david.maloney <david.maloney@dc.gov>; rnelson@achp.gov <rnelson@achp.gov>

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August 6, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, D.C. 20242

Via email: tammy_stidham@nps.gov

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Sincerely,

Judy

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August 6, 2026

Ms. Tammy Stidham
Associate Regional Director – Lands & Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

Via email: tammy_stidham@nps.gov

RE: Comments on Section 106 Area of Potential Effect for Triumphal Arch at Memorial Circle

Dear Ms. Stidham:

The Washington Chapter of the American Institute of Architects (AIA|DC) serves as both the state and local AIA chapter for the District of Columbia. Since its founding in 1887 and continuing to the present, AIA|DC and its members have played a central role in the planning, design, and development of the Nation's Capital.

We thank you for the opportunity to participate in the Section 106 consultation for the proposed Triumphal Arch at Memorial Circle, and for the opportunity to comment on its Area of Potential Effect. We look forward to engaging constructively in this process and to working with NPS and other consulting parties to ensure that any undertaking respects and preserves the historic character and significance of this nationally important and concentrated landscape of cultural resources.

Conceived to house the three branches of the federal government in a comprehensive urban plan that embodies their purpose and spirit, Washington, DC is unique among American cities. At the turn of the 20th century, AIA|DC members led by Glenn Brown agitated for the revival of this distinctive character first established by Peter Charles L'Enfant but degraded by a century of haphazard and arbitrary alterations. The fruit of their activism was the McMillan Plan, which enriched the baroque network of vistas into a modern system of functional, aesthetic, and symbolic relationships. What they understood, and has been central to the enduring power of the Monumental Core, was the interconnectedness of these spaces and structures. **A change to one element alters the rest. The space between focal commemorative sites is as important as the**

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monuments themselves. Since 1902, AIA|DC has sought to uphold this holistic approach, and this project deserves to be held to this same foundational principle of Washington, DC's greatness.

Consequently, AIA|DC objects to the proposed monumental arch in concurrence with the impacts to all of the long list of historic sites and cultural landscapes recently identified by the National Park Service in their Section 106 Assessment of Effect and Programmatic Agreement for the proposed Triumphal Arch. However, our organization feels a particular responsibility to object to the proposal on the basis of the irreversible damage the proposal will specifically inflict on the link between the Lincoln Memorial and Arlington House. Executed with solemn grandeur in the 1920s and 30s, this visually beautiful bond carries one of the weightiest points of symbolism within the System of Parks—which will be aesthetically and symbolically destroyed with this inappropriate and over-scaled proposal.

The importance of the Lincoln Memorial-Arlington House axis can be found in its absence on earlier plans. There could, of course, be no such axis before the McMillan Plan located the Lincoln Memorial on its current site. Nor could it have existed before Robert E. Lee's one-time home became the heart of Arlington National Cemetery. Only after the Civil War did the first serious efforts to span the river emerge. These did not initially mention an alignment with Arlington House.[1] An 1898 study by the Army's Chief of Engineers surveyed two slightly different routes across the Potomac from the former site of the Naval Observatory. Both terminated near Arlington National Cemetery's northeastern corner, with neither making a connection to Arlington House.[2] Those early plans differed from the eventual bridge in other ways as well. Most included substantial above-deck features, such as towers, arches, or suspension cables. The Commission of Fine Arts later summed up the various pre-1901 designs as proposing "a long, high, elaborate, ornate, and even grandiose structure."[3] They were, in summary,

[1] An 1886 Senate resolution, for example, described a bridge to begin "at or near the foot of New York or New Hampshire avenue" that would cross the Potomac River and Analostan (now Roosevelt) Island "to a point on the United States National Cemetery grounds at Arlington"; see *Congressional Record*, 49th Cong., 1st sess. (May 24, 1886), 4826. An 1897 law appropriated $2,500 for a survey and design of a bridge "from the most convenient point of the Naval Observatory grounds, or adjacent thereto, across the Potomac River to the most convenient point of the Arlington estate property"; see *An Act Making Appropriations for Sundry Civil Expenses..., U.S. Statutes at Large*, 30 (1897-99), 51.

[2] U.S. Congress, House, *Memorial Bridge across the Potomac River*, March 30, 1898, 55th Cong., 2d sess., 1898, H. Doc. 388, serial 3691.

[3] National Commission of Fine Arts, *Ninth Report, July 1, 1919-June 30, 1921* (Government Printing Office, 1921), 23. Some of the pre-1901 proposals are discussed in the report of the 1901 Senate Park Commission; see U.S. Congress, Senate, *The Improvement of the Park System of the District of Columbia*, Jan. 15, 1902, 57th Cong., 1st sess., 1902, S. Rep. 166, serial 4258, 57. For a more recent timeline and discussion of bridge proposals, see Meg Frisbie, et al., *Cultural Landscape Report: Memorial Avenue Corridor, George Washington Memorial Parkway* (National Park Service, 2024), 72ff.

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not considered as part of a holistic system of function, aesthetic effect, and symbolic meaning.

It was the 1901 Senate Park Commission that established these three relationships through the Lincoln Memorial-Arlington House axis and the emphasis on low, horizontal features that deferred to the two foci, similar to the purpose the Reflecting Pool serves between the Lincoln Memorial and the Washington Monument. The commission proposed a new Lincoln Memorial on the reclaimed Potomac Flats and suggested it serve as the "starting point" for a bridge that would have as its "main objective point—the mansion house at Arlington."[4] The connection between the United States President and a Confederate general therefore expressed the reconciliationist memory of the American Civil War, which emphasized sectional unity between North and South, an attitude that was ascendant among white Americans at the time.[5] The Lincoln Memorial was dedicated in 1922. Later that year, the Arlington Memorial Bridge Commission (AMBC) endorsed the Lincoln Memorial-Arlington House axis, which it called "the symbol of the binding together of the North and South in one indivisible Union, knowing no sectional lines."[6] The firm McKim, Mead & White designed the bridge and the new memorial corridor leading to Arlington National Cemetery. The AMBC emphasized the design's sightlines, explaining that "[i]n order not to interfere with the view of the Lincoln Memorial as seen from Columbia Island the bridge has been kept as low as possible."[7] The original design also included two slender 166-foot columns on Columbia Island specifically symbolizing the North and South. The AMBC described them as specifically "framing in but not interfering with the view of the Lincoln Memorial from the direction of the Lee Mansion."[8] (The columns were later omitted from the project out of fears that they might imperil aircraft, and the plaza where they would have stood was articulated as Memorial Circle during the development of the George Washington Memorial Parkway.)

Since the opening of Memorial Bridge in 1932, observers have repeatedly affirmed the importance and symbolism of the Lincoln Memorial-Arlington House axis. In August 1941, for example, the Commission of Fine Arts denounced a proposed location of the Pentagon near the cemetery's

[4] *Improvement of the Park System of the District of Columbia*, 56.
[5] On the reconciliationist memory of the Civil War, see David Blight, *Race and Reunion: The Civil War in American Memory* (Harvard University Press, 2001); for its expression at Arlington National Cemetery specifically, see Micki McElya, *The Politics of Mourning: Death and Honor in Arlington National Cemetery* (Harvard University Press, 2016).
[6] U.S. Congress, Senate, *Report of the Arlington Memorial Bridge Commission*, April 21 (Calendar Day, April 23), 1924, 68th Cong., 1st sess., 1924, S. Doc. 95, serial 8240, 5.
[7] *Report of the Arlington Memorial Bridge Commission*, 7.
[8] *Report of the Arlington Memorial Bridge Commission*, 41.

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entrance as "a blot upon the landscape" that would intrude on views both from Arlington House and the Lincoln Memorial. A local newspaper called it "an act of vandalism." Within weeks, that plan was abandoned for the Pentagon's current site.[9] Four decades later, when Arlington Memorial Bridge was listed on the National Register of Historic Places, the National Park Service described it as "symbolically link[ing] North and South in its alignment between the Lincoln Memorial and Arlington House."[10]

In memorializing the refoundation of the United States through this poignant, uninterrupted, and aesthetically coordinated connection, the McMillan Commission placed the axis on par with the relationships between the White House and the Capitol or the through-line of the National Mall itself. Altering this bond, as the applicant proposes to do, is the most radical change proposed to the Monumental Core since its substantial completion in the 1930s. Its excessive size and location directly on the axis occludes and transforms vistas from both the Lincoln Memorial and Arlington House. The size and location likewise overwhelm the experience of moving along the corridor, whether for routine trips or to a funeral for the end of a worthy life. Most importantly, this arch divides the most potent symbol of national unity in the country, all for a vague and evasive purpose. If the Arch really does celebrate the Semiquincentennial of American Independence, then its placement in a space of solemn memorialization clashes in both subject and tone. If it has no purpose subject to the Commemorative Works Act, then it is a frivolous desecration of a site that has offered closure to the Civil War and thousands of personal sacrifices. No great section of the public has asked for any of this, nor were they asked.

The Arch, in its size, location, and design degrades both Arlington House and the Lincoln Memorial individually. It likewise destroys the greater whole of which these two sacred sites are inseparable parts. Thirty-two administrations have respected this exceptional, historically significant, and beloved landscape. As earnest stewards of two centuries of architectural heritage in the Nation's Capital, the District of Columbia Chapter of the American Institute of Architects opposes the erection of this proposed Triumphal Arch.

[9] War Building Plan 'Outrage,' Art Group Says," *Washington Evening Star*, August 3, 1941, A-1; "From Arlington House," *Washington Evening Star*, August 6, 1941, A-8. On construction of the Pentagon, see Steve Vogel, *The Pentagon: A History* (Random House, 2007).
[10] "National Register of Historic Places Inventory - Nomination Form: Arlington Memorial Bridge," April 4, 1980, National Register of Historic Places and National Historic Landmarks Program Records, Records of the National Park Service, Record Group 79, National Archives, College Park, MD - NAID: 117691943.

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Outlook

REVIEW - Determination of Effect – Triumphal Arch

From Stidham, Tammy <Tammy_Stidham@nps.gov>

Date Fri 8/28/2026 1:53 PM

Bcc Porsia, Sara C <sara.porsia@sol.doi.gov>; Nersesian, Jen T <Jen_Nersesian@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-Ielmini@nps.gov>; Madello, Jennifer <Jennifer_Madello@nps.gov>; Levine, Haninah <haninah.levine@sol.doi.gov>; Beasley, Joy <Joy_Beasley@nps.gov>; david.maloney <david.maloney@dc.gov>; andrew.lewis <andrew.lewis@dc.gov>; Trocolli, Ruth (OP) <ruth.trocolli@dc.gov>; Kirchen, Roger (DHR) <roger.kirchen@dhr.virginia.gov>; Henderson, Samantha (DHR) <samantha.henderson@dhr.virginia.gov>; rnelson@achp.gov <rnelson@achp.gov>; jloichinger@achp.gov <jloichinger@achp.gov>; Sullivan, Diane <diane.sullivan@ncpc.gov>; Webb, Lee <lee.webb@ncpc.gov>; tluebke@cfa.gov <tluebke@cfa.gov>; sbatcheler@cfa.gov <sbatcheler@cfa.gov>; Lorin Farris <lfarris@arlingtonva.us>; mdurak@arlingtonva.us <mdurak@arlingtonva.us>; caitlin.e.smith36.civ@army.mil <caitlin.e.smith36.civ@army.mil>

Dear Consulting Parties:

The National Park Service (NPS) is submitting the enclosed Assessment of Effects for the proposed Triumphal Arch for review by the consulting parties pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations at 36 CFR Part 800.

The Assessment of Effects documents the NPS's evaluation of the proposed undertaking's potential to affect historic properties within the Area of Potential Effects, which has been informed significantly by feedback previously received from consulting parties. The assessment identifies the properties' significance, evaluates effects upon them, and provides the NPS's findings regarding effects to identified historic properties. The NPS has found this undertaking will have an adverse effect on one or more historic properties. This finding is documented in the Assessment of Effects.

The NPS requests that consulting parties review the enclosed Assessment of Effects and provide any written comments to the NPS by September 4, 2026.

The NPS also requests a consultation meeting with the SHPOs and consulting parties on September 9, 2026, to discuss the Assessment of Effects and to consult further to resolve the adverse effect pursuant to 36 CFR § 800.6. The NPS will provide meeting details, including time, location or virtual meeting information, and an agenda under separate cover.

Thank you for your continued participation in consultation for this undertaking. Please contact Tammy Stidham at 202-619-7474 or tammy_stidham@nps.gov with any questions, submit comments, or to coordinate the September 9 meeting.

Revised Assessment of Effect is available at this link- ParkPlanning- Triumphal Arch Assessment of Effect (Revised)- August 28, 2026

Sincerely-
Tammy Stidham

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

Outlook

REVIEW - Determination of Effect – Triumphal Arch

From Stidham, Tammy <Tammy_Stidham@nps.gov>
Date Fri 8/28/2026 1:52 PM
To david.maloney <david.maloney@dc.gov>
Cc Trocolli, Ruth (OP) <ruth.trocolli@dc.gov>; andrew.lewis <andrew.lewis@dc.gov>; jloichinger@achp.gov <jloichinger@achp.gov>; Ames, Christine (OP) <christine.ames@dc.gov>
Bcc Porsia, Sara C <sara.porsia@sol.doi.gov>; Nersesian, Jen T <Jen_Nersesian@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-Ielmini@nps.gov>; Madello, Jennifer <Jennifer_Madello@nps.gov>; Levine, Haninah <haninah.levine@sol.doi.gov>; Beasley, Joy <Joy_Beasley@nps.gov>

Dear Mr. Maloney:

The National Park Service (NPS) is submitting the enclosed Assessment of Effects for the proposed Triumphal Arch for review by the consulting parties pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations at 36 CFR Part 800.

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Revised Assessment of Effect is available at this link- ParkPlanning- Triumphal Arch Assessment of Effect (Revised)- August 28, 2026

Sincerely-
Tammy Stidham

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Outlook

REVIEW - Determination of Effect – Triumphal Arch

From Stidham, Tammy <Tammy_Stidham@nps.gov>
Date Fri 8/28/2026 1:52 PM
To Kirchen, Roger (DHR) <roger.kirchen@dhr.virginia.gov>
Cc Henderson, Samantha (DHR) <samantha.henderson@dhr.virginia.gov>; jloichinger@achp.gov <jloichinger@achp.gov>
Bcc Porsia, Sara C <sara.porsia@sol.doi.gov>; Nersesian, Jen T <Jen_Nersesian@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-Ielmini@nps.gov>; Madello, Jennifer <Jennifer_Madello@nps.gov>; Levine, Haninah <haninah.levine@sol.doi.gov>; Beasley, Joy <Joy_Beasley@nps.gov>

Dear Mr. Kirchen:

The National Park Service (NPS) is submitting the enclosed Assessment of Effects for the proposed Triumphal Arch for review by the consulting parties pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations at 36 CFR Part 800.

The Assessment of Effects documents the NPS's evaluation of the proposed undertaking's potential to affect historic properties within the Area of Potential Effects, which has been informed significantly by feedback previously received from consulting parties. The assessment identifies the properties' significance, evaluates effects upon them, and provides the NPS's findings regarding effects to identified historic properties. The NPS has found this undertaking will have an adverse effect on one or more historic properties. This finding is documented in the Assessment of Effects.

The NPS requests that consulting parties review the enclosed Assessment of Effects and provide any written comments to the NPS by September 4, 2026.

The NPS also requests a consultation meeting with the SHPOs and consulting parties on September 9, 2026, to discuss the Assessment of Effects and to consult further to resolve the adverse effect pursuant to 36 CFR § 800.6. The NPS will provide meeting details, including time, location or virtual meeting information, and an agenda under separate cover.

Thank you for your continued participation in consultation for this undertaking. Please contact Tammy Stidham at 202-619-7474 or tammy_stidham@nps.gov with any questions, submit comments, or to coordinate the September 9 meeting.

Revised Assessment of Effect is available at this link- ParkPlanning- Triumphal Arch Assessment of Effect (Revised)- August 28, 2026

Sincerely-
Tammy Stidham

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service

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David B. Woolner, Ph.D. – Senior Fellow and Resident Historian, Roosevelt Institute; Professor, History, Marist College

September 1, 2026

VIA EMAIL
Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
Washington, DC

Tammy:

I am in receipt of the *Triumphal Arch Assessment of Effect (Revised)* dated August 28, 2026, which was received in our capacity as a consulting party to the project. I appreciate the opportunity to review the assessment and have one comment. As our consulting party status was confirmed by you on August 6, 2026, I ask that our organization's name be included in the list of consulting parties on pages 69–70. Please note our name change – FDR Memorial Foundation.

I look forward to receiving information regarding the September 9, 2026 consulting party meeting.

Sincerely,

Mary E. Dolan

Mary E. Dolan
Co-Founder & Executive Director

ANC 2F
WASHINGTON, D.C.

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2F08 Brett Beasley, Secretary

Stuart West, Commission Admi*nistrator*

September 2 ,2026

WHEREAS, the National Park Service (NPS) describes the proposal as "The proposed United States Triumphal Arch (the Arch) would serve as a signature monumental structure honoring the nation's 250th anniversary and contributing to Washington, D.C.s tradition of honoring national principles"; and WHEREAS, the proposal is for a "250-foot "Triumphal Arch" near Arlington National Cemetery" and "The monument will be built at Memorial Circle on Columbus Island between the Lincoln Memorial and Arlington National Cemetery"; and WHEREAS, Memorial Circle is within Ward 2 of the District of Columbia, and WHEREAS, 2F is an ANC within Ward 2, and WHEREAS, the location is defined as "A proposed triumphal arch celebrating the United States Semiquincentennial would be located on Columbia Island in Washington, D.C. The site is a traffic circle on Memorial Drive between the end of the Arlington Memorial Bridge and Arlington National Cemetery named Memorial Circle. It is directly across the Potomac River from the Lincoln Memorial at the west end of the National Mall"; and

WHEREAS, the NPS further states "The proposed United States Triumphal Arch would be located at…the ceremonial gateway between Washington, D.C. and Arlington National Cemetery"; and
WHEREAS, the NPS Assessment of Effects finds the project "would have adverse effects on more than a dozen of the nation's most significant historic properties, including the Lincoln Memorial, Arlington National Cemetery, Arlington House, the National Mall, the Washington Monument, and Arlington Memorial Bridge"; and

WHEREAS, the NPS assessment "identified 37 sites that the proposed arch would negatively impact, mostly by obstructing their views"; and WHEREAS, D.C. Historic Preservation Officer David Maloney warned the Memorial Circle plan would "severely damage an exceptional cultural landscape and one of the most important symbolic places in the nation"; and WHEREAS, Maloney stated the administration should pick an "alternative site", specifically "an empty traffic oval located on South Capitol Street between Nationals Park and Audi Field"; and WHEREAS, that alternative location "would create an energizing focal point for a still-emerging neighborhood, suitable for a celebratory crowd" and "would enhance the historic L'Enfant Plan and the city's monumental landscape rather than detracting from it";

THEREFORE, BE IT RESOLVED that ANC 2F opposes construction of the Triumphal Arch at Memorial Circle as currently proposed.

BE IT FURTHER RESOLVED that ANC 2F urges the National Park Service and the National Capital Planning Commission to reject the Memorial Circle site.

This resolution was adopted by a vote of [8-0-0) on August 13, 2026, by Advisory Neighborhood Commission 2F at a duly called and properly noticed public meeting with a quorum present.

ON BEHALF OF THE COMMISSION,

Kevin Cataldo

Commissioner Kevin Cataldo, Chair, ANC 2F

DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
Neighborhood Services Division – Historic Preservation Program
2100 Clarendon Boulevard, Suite 700, Arlington, VA 22201
TEL 703.228.3830 www.arlingtonva.us

Memorandum

To: Tammy Stidham, Associate Regional Director, National Park Service (NPS)

Date: September 4, 2026

From: Mical Durak, Historic Preservation Program (HPP), CPHD

Subject: HPP Feedback on Assessment of Effects Report – August/September 2026

Thank you for reaching out to seek input on the final Assessment of Effects (AoE) Report. Please see below for Arlington County's Historic Preservation Program's (HPP) comments:

Feedback on the Assessment of Effects (AoE) Report:

Proposed Undertaking:

- National Park Service (NPS) staff note in the "Proposed Undertaking" section of the report that the plans presented for the arch "may not reflect the final design" and that "dimensions will be finalized during future design efforts." (pg. 8). HPP staff understand that certain changes occur in the field to construction projects; however, we are uncomfortable that what is presented is an approximation of what could be constructed. We request that NPS clarify in the AoE any design features they anticipate may require adjustment in the future and provide an outline of how and when NPS will engage with consulting parties if that design (including its dimensions) is altered.
- HPP Staff request that NPS staff elaborate on how the arch would be utilized by the public. HPP staff are aware that the proposed arch would have an observation deck, but NPS also notes "the gallery level would contain exhibit space…with the possibility of including a café and gift shop" (pg. 9). On A-2.20 of Appendix F, HPP staff also see two rooms dedicated to "program space." What would be on display or exhibited inside the arch? Would it be a permanent exhibit or a rotating one? Could it be connected to any of the mitigation measures outlined by NPS in the AoE? Or would it focus solely on the commemoration of the 250th anniversary which is NPS' stated main purpose for this project? It is unclear to HPP staff how this proposed arch would be a new destination for learning and contemplation as noted by NPS on pg. 11.

Project Alternatives:

- NPS staff note in the "Project Alternatives" section that they did not evaluate other alternative locations for the proposed arch outside of Memorial Circle since the arch design is "grounded in the historic design intent of the Arlington Memorial Bridge and Memorial Avenue corridor" (pg. 10). Further, NPS notes that the design intent for this portion of the corridor was intended to include further construction/development.

  - While it appears that the original 1924 Report of the Arlington Memorial Bridge Commission called for the construction of vertical monumental elements at Columbia Island, the originally proposed columns framed the corridor and measured 33.5 feet wide and 166 feet tall. In short, the original proposal called for something significantly smaller and more to scale with the surrounding landscape in comparison to what is currently being proposed by NPS. The construction of a commemorative feature of that original scale in this area would comply with the original plans, but HPP staff believe that the scale and massing of the proposed 250-foot-tall triumphal arch fall outside of the original scope of that plan and do not comply with its intended spirit, undermining any reliance on the initial intentions.
- NPS staff also note that placing the arch in the George Washington Memorial Parkway (GWMP) is "consistent with the park's purpose as a scenic roadway…protecting the cultural and natural resources that frame the Potomac River corridor" (pg. 11).
  - HPP staff disagree with this assessment. The placement of the proposed triumphal arch within the parkway would have a direct adverse effect on the historic resource, would impact the viewshed of the parkway, and would not protect the natural resources of the Potomac River corridor. Per the National Register of Historic Places (NRHP) nomination form (1995) for the GWMP, it has "significance as an instrument of conservation and protection of scenic and recreational resources. By its very existence, it prevents development along the river corridor and removes development potentially detrimental to the natural resources." Development along and within the GWMP has historically been limited to ensure that the iconic vistas and views of the parkway are visible to those utilizing it. Furthermore, part of the stated significance of the GWMP is in its ability to limit development, such as the kind being proposed by NPS.
- Given these factors, HPP staff strongly recommend that alternative locations for the proposed triumphal arch should be explored by NPS and do not agree with the assessment that its placement is directly grounded in connection to either the original plans for the Memorial Corridor and the GWMP.

Identification of Historic Properties:

- As noted in 36 CFR § 800.16(1), a historic property means any prehistoric or historic district, site, building, structure, or object listed or *eligible for* listing in the NRHP. Per Appendix J: List of Historic Properties within the Project Area and Appendix K: List of Historic Properties within the APE, NPS has only identified historic properties listed on the NRHP or listed as eligible/potentially eligible by the Virginia Department of Historic Resources (DHR) staff, but has not identified all historic properties that are eligible for listing in the NRHP, such as properties that have not been previously identified but meet the age requirements for eligibility. A full architectural survey should be completed to assess eligibility and effect on eligible resources. Therefore, this assessment does not comply with 36 CFR § 800.16(1) and standard requirements for an AoE. For assistance with this assessment as it pertains to Arlington County historic resources, we are happy to provide greater information and coordination with information gathering concerning these resources upon request within a reasonable timeframe of 15 days or more.

- HPP staff appreciate the additional information shared in Appendix H: Landscape Renderings including the new viewpoints and views of the arch at night. As shown in the rendering from the "Lee House Portico – After," the view of the Lincoln Memorial is completely obscured by the proposed triumphal arch. If the stated purpose of the original Memorial Corridor plan was to connect the north (embodied by the Lincoln Memorial) and the south (embodied by Arlington House), the construction of the proposed triumphal arch does not achieve and maintain that stated purpose and instead, by NPS' own assessment, obscures that view.
- It is still unclear to HPP staff if the viewshed analysis completed by NPS accounted for different times of the year, and therefore, varying levels of vegetation. This was not addressed in the "Viewshed Analysis" section of the AoE.

Identification of Effects:

- HPP staff agree that Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, Arlington House, and the Lincoln Memorial corridor would have a substantial adverse effect from this undertaking. We also agree that the Lincoln Memorial Cultural Landscape, Lincoln Memorial, National Mall Site and National Mall Historic District, The Mall Cultural Landscape, Washington Monument, Washington Monument and Grounds Historic District, Washington Monument and Grounds Cultural Landscape, the East and West Potomac Park Historic District, L'Enfant Plan of the City of Washington, Arlington Ridge Park, Pentagon, Fort Myer NHL District, George Mason Memorial, Thomas Jefferson Memorial, Thomas Jefferson Memorial Cultural Landscape, United States Capitol, Georgetown Historic District, Old Naval Observatory, Observatory Hill Historic District, Key Bridge, National Cathedral, and National War College, to name a few, would all be adversely effected by this project due to the visual impact and alterations to their setting, context, and nighttime visual character.
    - However, until all historic properties eligible for listing in the NRHP are outlined in NPS' analysis (Appendix L: Assessment of Adverse Effects), HPP staff cannot provide our full assessment of this data.
- HPP staff continue to suggest that NPS outline exactly the parameters they are utilizing for determining adverse effects, particularly for those resources that will experience an adverse visual effect or indirect effect. For example, how did NPS determine viewshed impact from certain resources? When determining viewshed with human scale in mind, is NPS considering only the facades of historic resources or secondary elevations too? Is it considering the public right-of-way only? Providing clearly defined terms and insight into the methodology behind these determinations will be helpful to the public and necessary for consulting parties when reviewing those determinations.
- HPP staff appreciate the commitment by NPS to conduct a Phase IB subsurface archaeological investigation prior to the start of any construction activities as noted in the "Identification of Historic Resources" section. However, we question whether excluding this information from the AoE complies with standard Section 106 procedures. NPS notes that a "programmatic agreement will be developed for this project to define the continued consultation process for the identification and evaluation of resources, and the resolution of any adverse effects on NRHP-eligible archaeological resources" (pgs. 33 – 34). Not having this data presented in the AoE leaves it incomplete and therefore, makes

it challenging for consulting parties to provide a full assessment of the data. HPP staff request that data be included in the AoE and note that it is necessary for the provision of comprehensive comment and assessment of the impact of this proposed project.

Avoidance, Minimization, and Mitigation Measures:

- NPS notes that a smaller arch was "ultimately dismissed" given that it would have had a "greater impact on the cultural landscapes" due to obstructing the views between the Lincoln Memorial and the Arlington National Cemetery (pg. 35). Furthermore, a smaller design was also dismissed because the arch is intended to celebrate the 250th anniversary of America by measuring 250 feet tall.
    - While HPP staff can understand the desire for the symbolic connection between the 250-foot-tall arch and the nation's 250th anniversary, we do not find this relationship sufficient to justify the arch's substantial scale and massing. It is still unclear to HPP staff how this arch celebrates and reflects the 250th anniversary of America through its design.
    - Furthermore, HPP staff request that any study completed of a smaller arch design be shared with consulting parties for their review. NPS notes that smaller designs obstruct the views between the Lincoln Memorial and Arlington National Cemetery; however, the current design also obstructs those views. A smaller designed arch or commemorative feature in this circle would be more appropriate and would have less of an impact on the existing historic and cultural landscape.
- NPS staff state that "avoidance through eliminating the proposed vertical commemorative feature was also not consistent with the undertaking's purpose" (pg. 36) and was ultimately not considered given that it would fail to meet the undertaking's purpose and need.
    - HPP staff understand that a no-build option would not meet the undertaking's purpose and need to commemorate the 250th anniversary. However, as reiterated above, full consideration of a smaller feature was not completed by NPS or at least shared as an alternative with consulting parties. NPS notes that several concepts for commemorative features in Memorial Circle were reviewed over the years and that "later design revisions reduced the scale of those earlier concepts and ultimately replaced the proposed monumental columns with smaller sculptural pavilions…" (pg. 36). There is precedent, from a design conception point of view, for smaller, to scale commemorative features in this circle rather than what is being proposed today. Scaling the massing and height of the proposed arch or exploring other more appropriately designed commemorative features for the circle would still allow NPS to "accomplish the undertaking's core purpose of completing the historically contemplated civic and commemorative role of Memorial Circle." (pg. 36).
- HPP staff appreciate the proposed mitigation and minimization measures outlined on pgs. 37 – 45 of the AoE that could be considered during the development of a Memorandum of Agreement (MOA). HPP staff would support the implementation of all or most of these measures to mitigate the large impact of this undertaking on surrounding historic and cultural resources.
    - Construction management control is essential, especially given the impact the construction of this proposed undertaking would have on the daily operations of

the Arlington National Cemetery (ANC). HPP staff have concerns about the potential noise impact of this project on the cemetery during solemn events. Furthermore, NPS notes that they would coordinate with ANC to "avoid disruptive construction activities during funerals" (pg. 37). ANC has 24 to 27 funerals a day and had over 5,200 funerals in fiscal year 2025 alone. HPP staff strongly urge NPS staff to consider how this project will impact these operations to honor and remember those who have served and how it is a virtual certainty this project will have construction activities impact active funerals at ANC given their frequency.

- Under "Archaeological Investigation," HPP staff seek clarification on the archaeological monitoring proposed. NPS notes that archaeological monitoring would occur during "excavation, foundation work, and utility installation" on pg. 38, but on pg. 39 notes that monitoring would occur during "deep excavation." Given the potential for archaeological resources, as noted by NPS, monitoring during any excavation would be warranted – not just during "deep excavation."
- Under "Documentation," NPS offers oral histories as a mitigation measure; however, it notes that "transcripts and recordings would be archived and, where appropriate, made available for interpretation, research, and public education" (pg. 41). Could NPS explain why only certain transcripts would be made available? How would this be a true mitigation measure if this information was not available to the larger public for research and study?
- HPP staff want to reiterate that the terms of mitigation should apply to all adversely effected properties such as, but not exclusive to, Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, ANC, Arlington House, and the Lincoln Memorial corridor. Furthermore, for the mitigation efforts proposed that would not have placement on or near the site, the final products should be accessible to the public either through a repository such as the Library of Congress or a website. HPP staff would like to be notified where those items are located in the future so we can request access to them.
- Outside of what was proposed in the AoE for mitigation and minimization, NPS should also consider further measures to support American troops and veterans utilizing these areas (both the ANC and the Military Women's Memorial) given the impact this proposed project would have on that landscape and those spaces. NPS should also consider the use of easements or placement of other limitations on future redevelopment for these historic areas and cultural landscapes.

In conclusion, HPP staff have concerns that NPS has not considered avoidance or alternative options to what is being proposed enough as part of this effort. It is unclear what the ultimate purpose of the proposed triumphal arch would be and how it would benefit the American public. Furthermore, HPP staff have significant concerns that the full impact of this undertaking on all historic and archaeological resources has not been fully considered by NPS and presented to consulting parties. Finally, we would like to reiterate that the requested deadline for comments on the AoE does not follow standard protocols and has impacted our ability to provide a comprehensive response. As with the past three engagements with consulting parties, it does not follow the standard Section 106 process.

We welcome future opportunities to meaningfully engage in the Section 106 process for this undertaking in the future.

Mical Durak
Historic Preservation Principal Planner

Outlook

[EXTERNAL] Triumphal Arch - Section 106 Consultation

From Paul Edmondson <paul@preservationlaw.com>
Date Fri 9/4/2026 6:51 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Judy Chesser <chair@committeeof100.net>; david.maloney <david.maloney@dc.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. Stidham, I'm sending this on behalf of Judy Chesser, who is having computer issues this afternoon. Thanks.

****

Dear Ms Stidham:

Thank you for the opportunity to review and comment on the Final Assessment of Effects for the Triumphal Arch.

Like other Consulting Parties, we look forward to the opportunity to meet on September 9th to hear first-hand from NPS regarding the Revised Assessment of Effects Report, and to have a chance for dialogue regarding its conclusions. We believe it would be most beneficial to have that discussion before we submit additional formal comments, but will plan to do so following that meeting.

In preparation for that meeting:

1. We would appreciate an explanation of Secretary Burgum's statement on X that "[w]e are pleased to announce that after a very long wait (over 125 years!), we are preparing to start, over the next two-week period, the excavation work necessary for the Great Triumphal Arch and Military Observation Deck, at Memorial Circle on Columbia Island between the Lincoln Memorial and Arlington National Cemetery." Does NPS plan to initiate construction before the completion of the Section 106 review process?

2. Secretary Burgum's reference to a "Military Observation Deck" is one we have not seen previously. (Previous plans have simply referred to a "public" observation deck.) Please explain if this is meant to suggest any change of design or intended use.

3. The Committee of 100 would like to gain a better understanding of NPS's decision not to consider alternative locations, based on the stated premise that the proposed arch "completes a century-old civic design concept." Our understanding of the 1924 design concept is that it was very different from the

current proposal. Is Secretary Burgum's reference to waiting "over 125 years" referring to an even earlier design?

Thank you.

Judy Chesser
Chair
Committee of 100 on the Federal City

Cc: David Maloney

Outlook

Re: REVIEW - Determination of Effect – Triumphal Arch

From Smith, Kathryn G <Kathryn_Smith@nps.gov>
Date Fri 9/4/2026 2:17 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc Campbell, Patrick <J_Patrick_Campbell@nps.gov>

Tammy,

Below are my comments related to the adverse effects on National Historic Landmarks (NHLs).

1. It appears that the corrections and reassessments that I suggested in my last set of comments were not addressed.
2. It appears that NPS did not “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to" the NHLs as required under Section 110(f) of the National Historic Preservation Act (54 U.S.C. § 306107)(NHPA). Minimization to the maximum extent would require redesigning the arch in some other form that has lesser adverse effects on the NHLs. I saw no attempt to design a feature or landscape at the site that would avoid or minimize adverse effects to the surrounding NHLs. The report states NPS's intention to "complete th[e] historically contemplated idea at Memorial Circle," but no other designs were contemplated beyond monumental arches of different heights. Why was the approved design for two offset vertical columns not considered if the intent was to "complete" a historically contemplated design? Why did the designers not develop alternative designs that respect the intention of the designers of the Memorial Bridge-Memorial Avenue and the Congressionally appointed commission that approved it? It's clear that less substantial vertical elements would have less adverse effects on the surrounding NHLs and would preserve the critical viewshed. Without the consideration of alternative designs that minimize the visual effects on the NHLs, I don't believe NPS has fulfilled its statutory obligations under Section 110(f) of the NHPA.
3. I don't see any mitigation measures that address the adverse effects on the NHLs. All mitigation is focused on NPS managed property, but adverse effects extend beyond NPS lands. The NPS should develop, in consultation with the owners of the NHLs, mitigation that addresses visual effects on the six affected NHLs.

Thank you for the opportunity to comment. Please reach out if you have questions and I look forward to the consultation meeting on September 9th.

Best,
Kathryn

Kathryn G. Smith
National Historic Landmarks Coordinator
Community Preservation Assistance Program Manager
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov

NCR Website https://www.nps.gov/RESSNCR

NHL Website http://www.nps.gov/nhl
Facebook National Historic Landmark Program - NPS
Instagram NationalHistoricLandmarkNPS #NationalHistoricLandmark #FindYourPark

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From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Thursday, September 3, 2026 3:19 PM
To: Stidham, Tammy <Tammy_Stidham@nps.gov>
Subject: Re: REVIEW - Determination of Effect – Triumphal Arch

Good Afternoon-

A meeting invite has been sent for September 9th at 1:00 for a virtual consulting parties meeting. Please let me know if you did not receive it. In addition, I am writing to notify you that the comment period for the Assessment of Effect has been extended to September 16th.

As always, please let me know if you have any question or need additional information-

Tammy

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

From: Stidham, Tammy <Tammy_Stidham@nps.gov>
Sent: Friday, August 28, 2026 1:53 PM
Subject: REVIEW - Determination of Effect – Triumphal Arch

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

David L. Bulova
Secretary of Natural and Historic Resources

Roger W. Kirchen
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

September 9, 2026

Ms. Jennifer T. Nersesian
Regional Director, National Capital Region
National Park Service
5300 Wellington Branch Drive, Suite 100
Gainesville, Virginia 20155

Re: Triumphal Arch at Memorial Circle—Final Assessment of Effects
Arlington, Virginia
DHR File No. 2026-4065

Dear Ms. Nersesian:

The Department of Historic Resources (DHR) has received from the National Park Service (NPS) a request for comments regarding their final assessment of effects for the proposed undertaking. The NPS provided these documents to DHR and consulting parties on August 28. While NPS originally requested written comments by September 4, they have extended the requested review period to September 16. NPS has also requested a consulting party meeting on September 9. DHR looks forward to the opportunity to participate in the consulting parties meeting and hearing from NPS regarding the determinations contained within this new submission. We also look forward to the opportunity to hear from consulting parties regarding the undertaking and their perspectives regarding the assessment of effects.

The NPS has requested a response to their revised identification of historic properties; additional information regarding alternatives; avoidance and minimization measures; assessments of effects for over 250 historic properties; and potential mitigation measures. The revised assessment of effects is substantively changed from the original document submitted on June 5 and contains new information not previously included in any prior submission. DHR reminds NPS that we did not concur with their request to expedite the review of this undertaking pursuant to 36 CFR § 800.3 (g). While DHR appreciates that NPS extended their requested timeline for response, in accordance with 36 CFR Part 800, DHR is not obligated to provide our comments within the arbitrary and inappropriately short time frame requested.

While NPS has determined overall that the undertaking will adversely affect numerous historic properties, NPS has also determined that numerous historic properties within the Area of Potential Effects (APE) will not be adversely affected. Per 36 CFR § 800.5 (c) SHPO has 30 days from the receipt of this finding to review the finding and object if necessary. DHR will utilize the review time that the regulations afford us. While DHR will work to provide our comments as close to the requested September 16, per the regulations,

our lack of full comments within the time frame set by NPS should not be construed as failure to comment or agreement with/lack of objection to NPS' findings.

Consulting Parties and Public Comments

The revised final assessment of effects includes tables outlining consulting parties' comments and a summary of public comments compiled by AI. DHR reiterates our request to review the public notice comments not an AI generated summary regarding this undertaking so that we, as Virginia SHPO, can understand the comments expressed by citizens of the Commonwealth of Virginia regarding this project. DHR would also like to be afforded the opportunity to review the actual comments prepared by consulting parties, not NPS' summary. Based on the summary, many of the consulting parties' comments remain unaddressed. Please advise when NPS will directly address the comments provided by consulting parties.

Initiation of Construction Prior to Completion of Section 106 Review

On September 3, Secretary of the Interior Doug Burgum posted on X that "we are preparing to start, over the next two-week period, the excavation work necessary for the Great Triumphal Arch and Military Observation Deck, at Memorial Circle on Columbia Island between the Lincoln Memorial and Arlington National Cemetery."

Excavation work at Memorial Circle required to construct the arch and conduct the archaeological investigations proposed beyond the presumed fill on Columbia Island, as described in submissions prepared by the NPS, will be extensive and will adversely affect historic properties. It is DHR's opinion that initiation of any construction with the potential to cause adverse effects to historic properties prior to the conclusion of the Section 106 review and the resolution of adverse effects to historic properties constitutes a failure to comply with the National Historic Preservation Act and 36 CFR Part 800. It is DHR's opinion that the proposed start of construction constitutes a foreclosure of the Advisory Council on Historic Preservation's opportunity to comment in accordance with 36 CFR § 800.9. DHR requests that NPS address this at the consulting parties meeting and in writing.

Please contact me at samantha.henderson@dhr.virginia.gov or (804) 482-6088 to continue consultation on this undertaking.

Sincerely,

Samantha Henderson, Director
Review and Compliance Division

September 14, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement

Dear Ms. Stidham,

Thank you for the opportunity to comment on the proposed Triumphal Arch that would be built at the western terminus of Arlington Memorial Bridge in Memorial Circle. These comments about the September 9, 2026, consulting parties meeting complement those filed by The Cultural Landscape Foundation (TCLF) on June 15, 2026, July 18, 2026, and August 6, 2026, and again register the foundation's **very strong opposition** to siting a Triumphal Arch in Memorial Circle for the reasons cited below.

The National Park Service issued an extensive Assessment of Effects report on August 28, 2026, which identified dozens and dozens of "adverse effects" the 250-foot-tall Arch would permanently create. Chief among them, the Arch would forever disrupt the visual and symbolically important viewsheds between the Lincoln Memorial and Arlington House, Arlington National Cemetery, and the Kennedy Gravesite and Eternal Flame. The memorial expression from the Lincoln Memorial across Arlington Memorial Bridge and up to Arlington National Cemetery represents the healing of the nation following the Civil War and ranks among the country's most important cultural landscapes.

A primary function of the agency in a Section 106 review is to identify ways to "avoid, minimize, or mitigate" the adverse effects. NPS not only maintains that the site selection and design are unalterable and non-negotiable, but it also refuses to even consider alternate sites and designs. Startlingly, the NPS representative who presented the proposal refused to say who specifically at the Department of the Interior was responsible for the decision not to consider alternatives. Andrew Lewis, with the D.C. State Historic Preservation Office, said of NPS' inaction: "The Park Service has failed to meet the most basic requirement of Section 106."

The foundation for NPS' obstinance is legally dubious and intellectually contorted. The agency maintains that they "did not evaluate alternative locations outside Memorial Circle because the proposed undertaking is grounded in the historic design intent for the Arlington Memorial Bridge and Memorial Avenue corridor."

The alleged "historic design intent," according to NPS, is included in a 1924 report of the Arlington Memorial Bridge Commission, which called for erecting two 166-foot-tall "columns [that] were intended to frame, mark, and give architectural emphasis to the transition between Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, and the entrance sequence to Arlington National Cemetery." NPS claims, "the current undertaking," that is, the 250-foot tall Monumental Arch, "is intended to respond to and complete that historically contemplated idea at Memorial Circle."

There are several problems with this scenario and, as video of the September 9 Section 106 consulting parties meeting demonstrates, NPS cannot provide straight answers. The 1924 Commission report specifically says on page nine: "two stately columns are proposed to be erected … framing in **but not interfering with the view of the Lincoln Memorial from the direction of [what is now known as Arlington House]**." [emphasis added] If that is the "historic design intent," then the Monumental Arch, which would permanently interfere with those views and not frame them, does not represent that 1924 commission's conclusions. When confronted with this, an NPS official deflected.

For the record, the framing columns were never built. So, while they may have been proposed, the final approved design—which reflects the realized historic intent of the designers—removed them.

In addition, the draft Programmatic Agreement that would memorialize the conditions of the completed Section 106 process states: "The Undertaking will be consistent with *Secretary of the Interior's Standards for the Treatment of Historic Properties …*" Here's the problem for the administration: these *Standards* are explicit that **"Designs that were never executed historically will not be constructed."** [emphasis added] When asked about this discrepancy an NPS representative said: "I'm not sure I have a great answer to that question."

U.S. Commission of Fine Arts Secretary Thomas Luebke noted a striking contradiction. The purpose of the Arch, according to the NPS representative, is to "celebrate the [nation's] 250th anniversary." He asked if celebrating the 250th was part of the purpose of the 1924 Commission report. The NPS representative responded, "I do not believe so." In effect, NPS is citing a century old action with a different purpose as the intellectual and legal basis for an Arch in 2026.

The NPS representative said one intent of the meeting was to get consulting parties' feedback about mitigation and minimization options. But she also stated: "**In this undertaking we are unable to avoid the [negative] effects based on the purpose and need of the project … the project is location dependent and the design is set.**" [emphasis added]

At this point TCLF wishes to cite and align itself with Mr. Lewis' remarks at the first consulting parties meeting on June 15, 2026 (to which TCLF and several other organizations were not invited):

> [T]he Park Service failed to initiate early consultation in accordance with the regulations so that a broad range of alternatives may be considered. And … they have thus far failed to conduct consultation in a manner appropriate to the scale or nature of the undertaking, taking [into account] its likely effects on historic properties or the scope of federal involvement. All of those, as you well know, are direct quotes from the regulation. And, for these reasons, and perhaps of most concern, the Park Service has not yet developed or evaluated alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties in any meaningful way.

Mr. Lewis also provided a broader and more sobering context with which to consider this current undertaking:

> [W]e're not only dealing with the integrity of a few historic properties here. This is not just about whether the integrity of location, design, setting, materials, workmanship, feeling, and

association of these extraordinarily and significant properties have been diminished. Instead, the integrity of the Section 106 process itself may be at stake here, especially as it applies to the review of future memorials in D.C. Typically, those reviews take years, not just as a result of Section 106, but also due to reviews conducted in a normal circumstance by CFA, NCPC, and those that are conducted in accordance with other laws such as NEPA. That much time is usually required not because of bureaucratic red tape but because these monuments become permanent features in the core of our nation's capital. They have lasting effects on the fabric of the city and because they warrant the level of scrutiny necessary to insure that they accurately represent the ideals they are intended to convey in an inspiring way that is also compatible with the historic setting.

But as we all know Section 106 doesn't just apply to memorials it's also supposed to apply equally to all historic properties that are affected by federal undertakings. So, again, the integrity of the Section 106 process itself may be one of the most important considerations we need to be taking into account in the review of this Arch. If we fail to protect that integrity we stand to diminish not only one of the most important designed features of the historic plan of the city of Washington, but also the legal process we all rely on to protect what's important to us at the city, state, and national level.

What happens next is up to the National Park Service, which could either observe and respect the Section 106 process, as it has for decades, or continue to pervert it citing the flimsiest of justifications, as it has with the Arch. TCLF urges the agency to pursue the former and uphold the integrity of the process and seek alternatives to citing an Arch in Memorial Circle.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding

Dear Consulting Parties:

The National Park Service (NPS) is submitting the enclosed Assessment of Effects for the proposed Triumphal Arch for review by the consulting parties pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations at 36 CFR Part 800.

The Assessment of Effects documents the NPS's evaluation of the proposed undertaking's potential to affect historic properties within the Area of Potential Effects, which has been informed significantly by feedback previously received from consulting parties. The assessment identifies the properties' significance, evaluates effects upon them, and provides the NPS's findings regarding effects to identified historic properties. The NPS has found this undertaking will have an adverse effect on one or more historic properties. This finding is documented in the Assessment of Effects.

The NPS requests that consulting parties review the enclosed Assessment of Effects and provide any written comments to the NPS by September 4, 2026.

The NPS also requests a consultation meeting with the SHPOs and consulting parties on September 9, 2026, to discuss the Assessment of Effects and to consult further to resolve the adverse effect pursuant to 36 CFR § 800.6. The NPS will provide meeting details, including time, location or virtual meeting information, and an agenda under separate cover.

Thank you for your continued participation in consultation for this undertaking. Please contact Tammy Stidham at 202-619-7474 or tammy_stidham@nps.gov with any questions, submit comments, or to coordinate the September 9 meeting.

Revised Assessment of Effect is available at this link- ParkPlanning- Triumphal Arch Assessment of Effect (Revised)- August 28, 2026

Sincerely-
Tammy Stidham

Tammy Stidham
Associate Regional Director- Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

Outlook

REVIEW - Triumphal Arch MOA

From Stidham, Tammy <Tammy_Stidham@nps.gov>

Date Tue 9/15/2026 5:43 PM

To david.maloney <david.maloney@dc.gov>; Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Trocolli, Ruth (OP) <ruth.trocolli@dc.gov>; Roger.Kirchen <Roger.Kirchen@dhr.virginia.gov>; Henderson, Samantha (DHR) <samantha.henderson@dhr.virginia.gov>; rnelson@achp.gov <rnelson@achp.gov>; jloichinger@achp.gov <jloichinger@achp.gov>; Sullivan, Diane <diane.sullivan@ncpc.gov>; Webb, Lee <lee.webb@ncpc.gov>; tluebke@cfa.gov <tluebke@cfa.gov>; sbatcheler@cfa.gov <sbatcheler@cfa.gov>; Lorin Farris <lfarris@arlingtonva.us>; mdurak@arlingtonva.us <mdurak@arlingtonva.us>; caitlin.e.smith36.civ@army.mil <caitlin.e.smith36.civ@army.mil>; sarah.y.koeppel.ctr@mail.mil <sarah.y.koeppel.ctr@mail.mil>; mfloca@kennedy-center.org <mfloca@kennedy-center.org>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; ExecSecretariat.FHWA@dot.gov <ExecSecretariat.FHWA@dot.gov>; kevin.rose@dot.gov <kevin.rose@dot.gov>; Imamura, Joseph <joseph.imamura@aoc.gov>

Cc TVoyles@achp.gov <TVoyles@achp.gov>; rnelson@achp.gov <rnelson@achp.gov>

Bcc Porsia, Sara C <sara.porsia@sol.doi.gov>; Beasley, Joy <Joy_Beasley@nps.gov>; Nersesian, Jen T <Jen_Nersesian@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-Ielmini@nps.gov>; Madello, Jennifer <Jennifer_Madello@nps.gov>; Levine, Haninah <haninah.levine@sol.doi.gov>; Hoaglund, Jordan W <jordan_hoaglund@nps.gov>

1 attachment (58 KB)

09152026_Arch MOA.docx;

Dear Colleagues,

Thank you for participating in the Section 106 consultation process for the proposed Triumphal Arch at Memorial Circle (the “Arch”).

On September 9, 2026, the National Park Service (“NPS”) held a Consulting Party meeting to discuss potential ways to avoid, minimize, or mitigate adverse effects on historic properties posed by the Arch. Much of the conversation focused on matters outside the scope of the Section 106 consultation process. To refocus the consultation process on mitigation, attached please find a Memorandum of Agreement (“MOA”) detailing mitigation measures NPS proposes to take in connection with the Arch.

NPS would like all consulting parties to provide any feedback/comments on the proposed mitigation measures outlined in the MOA by 12:00 noon EST on Monday, September 21, 2026. If you agree with the proposed mitigation measures, please sign and return the MOA by the Monday deadline.

Again, to refocus the consultation on avoidance, minimization, and mitigation measures beneficial to the identified historic properties adversely affected by the Arch, please provide NPS with any feedback on the proposed MOA by Monday, September 21, 2026, at 12:00 noon EDT.

Tammy Stidham

Associate Regional Director- Lands and Planning

National Park Service
1100 Ohio Drive SW
Washington, DC 20242
voice- (202)619-7474
mobile- (202)438-0028
tammy_stidham@nps.gov

Outlook

[EXTERNAL] Re: REVIEW - Triumphal Arch MOA

From Rebecca Miller <rebecca@dcpreservation.org>
Date Tue 9/15/2026 10:21 PM
To Stidham, Tammy <Tammy_Stidham@nps.gov>
Cc david.maloney <david.maloney@dc.gov>; Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Trocolli, Ruth (OP) <ruth.trocolli@dc.gov>; Roger.Kirchen <Roger.Kirchen@dhr.virginia.gov>; Henderson, Samantha (DHR) <samantha.henderson@dhr.virginia.gov>; rnelson@achp.gov <rnelson@achp.gov>; jloichinger@achp.gov <jloichinger@achp.gov>; Sullivan, Diane <diane.sullivan@ncpc.gov>; Webb, Lee <lee.webb@ncpc.gov>; tluebke@cfa.gov <tluebke@cfa.gov>; sbatcheler@cfa.gov <sbatcheler@cfa.gov>; Lorin Farris <lfarris@arlingtonva.us>; mdurak@arlingtonva.us <mdurak@arlingtonva.us>; caitlin.e.smith36.civ@army.mil <caitlin.e.smith36.civ@army.mil>; sarah.y.koeppel.ctr@mail.mil <sarah.y.koeppel.ctr@mail.mil>; mfloca@kennedy-center.org <mfloca@kennedy-center.org>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; ExecSecretariat.FHWA@dot.gov <ExecSecretariat.FHWA@dot.gov>; kevin.rose@dot.gov <kevin.rose@dot.gov>; Imamura, Joseph <joseph.imamura@aoc.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Tammy,

While the DC Preservation League appreciates the NPS drafting a mitigation document, we object to the direction of this Section 106 process. Under 36 CFR § 800.6, the primary requirement of the Section 106 consultation process is to consult to **avoid**, **minimize**, or **mitigate** adverse effects—in that specific order of priority.
As of our last meeting — the first that DCPL was invited to participate in—the NPS jumped straight to proposing mitigation measures without a well-defined purpose and need, or making any meaningful attempt to explore alternatives that would avoid adverse effects on multiple historic properties and National Historic Landmarks altogether. Skipping directly to an MOA forecloses discussion on project modifications, scale adjustments, or design alternatives that would eliminate the harm before it occurs. This is not consistent with NPS practice, NPS regulations, or the intent of the National Historic Preservation Act.

Nothing, in my recollection, discussed at the September 9th meeting focused on "matters outside the scope of the Section 106 consultation process."

Before the consulting parties review proposed mitigation measures in an MOA, DCPL requested, and other consulting parties also requested, that the NPS schedule a targeted consultation meeting to

evaluate alternatives that avoid adverse effects caused by the Arch on surrounding historic sites, viewsheds, and landscapes.

A simple statement that no alternatives exist or will be considered is not acceptable from a process perspective.

The DC Preservation League looks forward to continued and substantive consultation that meets, at the very least, the spirit of the National Historic Preservation Act.

Rebecca

On Tue, Sep 15, 2026 at 5:43 PM Stidham, Tammy <Tammy_Stidham@nps.gov> wrote:

> Dear Colleagues,
>
> Thank you for participating in the Section 106 consultation process for the proposed Triumphal Arch at Memorial Circle (the "Arch").
>
> On September 9, 2026, the National Park Service ("NPS") held a Consulting Party meeting to discuss potential ways to avoid, minimize, or mitigate adverse effects on historic properties posed by the Arch. Much of the conversation focused on matters outside the scope of the Section 106 consultation process. To refocus the consultation process on mitigation, attached please find a Memorandum of Agreement ("MOA") detailing mitigation measures NPS proposes to take in connection with the Arch.
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>
> ---
>
> Tammy Stidham
> Associate Regional Director- Lands and Planning
> National Park Service
> 1100 Ohio Drive SW
> Washington, DC 20242
> voice- (202)619-7474
> mobile- (202)438-0028
> tammy_stidham@nps.gov

--

Rebecca Miller
Executive Director

DC Preservation League
1328 Florida Avenue, NW, 2nd Floor
Washington, DC 20009
T- 202.783.5144

Join today to help protect Washington, DC's irreplaceable historic places and spaces!
www.dcpreservation.org

The Committee of 100
on the Federal City

945 G Street, N.W., Washington, D.C. 20001 ◆ www.committeeof100.net ◆ info@committeeof100.net

September 16, 2026 By email: tammy_stidham@nps.gov

Ms. Tammy Stidham, Associate Regional Director
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Section 106 Consultation, Triumphal Arch – Assessment of Effects and Failure to Consider Alternative Locations: Comments of the Committee of 100 on the Federal City

Dear Ms. Stidham:

On behalf of the Committee of 100 on the Federal City ("Committee of 100"), we write in response to your request to the Consulting Parties to provide written comments on the Revised Assessment of Effects Report ("Revised AOE Report") on the proposed Triumphal Arch (the "Project"). The views stated below also reflect discussions at the Consulting Party meeting of September 9, 2026, in which representatives of the Committee of 100 participated.

A number of the participants in the September 9th meeting raised specific points regarding the properties affected by the Proposed Arch and the evaluation of impacts, which we support, but the undisputable conclusion remains the same: The Project as proposed would have significant adverse effects on historic properties within the Area of Potential Effects, and those impacts would seriously damage the cultural landscapes that help to define the character of the Nation's Capital. The record on this point is abundantly clear.

It is also abundantly clear that those impacts could be greatly minimized and mitigated by relocating the project to an alternative site. Yet, you made clear in the September 9, 2026, meeting that the National Park Service considers the design and location of the Arch Proposal to be final. You stated: "For this project, we're not considering alternative locations or changes in design."

As we have stated previously, the NPS's refusal to consider either (1) a no-build alternative, or (2) other locations with less damaging impacts forecloses the consideration of less harmful alternatives and violates the agency's obligations under 36 CFR § 800.6(a) to "develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties." In our view, that refusal is based on a deeply flawed understanding of the authorities and the historic record cited as justification (in the NPS's Revised AOE Report, and as confirmed by you during the September 9, 2026, meeting).

The NPS Rationale for Refusing to Consider Alternatives

According to the Revised AOE Report (p. 11), the NPS's refusal to consider alternative locations is based on the premise that the proposed arch "completes a century-old civic design concept." The Revised AOE Report states:

> "The NPS did not evaluate alternative locations outside Memorial Circle because the proposed undertaking is grounded in the historic design intent for the Arlington Memorial Bridge and Memorial Avenue corridor. The location is not being treated as an interchangeable site for a new commemorative feature; rather, it is the specific location

identified in the historic planning framework for the bridge, Memorial Avenue, and Columbia Island/Memorial Circle. The 1924 Report of the Arlington Memorial Bridge Commission described a design concept that included monumental vertical elements at Columbia Island in connection with the bridge's western terminus and the ceremonial approach to Arlington National Cemetery. Those proposed columns were intended to frame, mark, and give architectural emphasis to the transition between Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, and the entrance sequence to Arlington National Cemetery.

"Because *the current undertaking is intended to respond to and complete that historically contemplated idea at Memorial Circle*, the NPS focused its review on whether the proposed Arch, in this location, would affect historic properties and how those effects could be addressed. Locations elsewhere in Washington, D.C. or Virginia would represent a materially different undertaking because they would not implement or reference the 1924 Arlington Memorial." Revised AEO Report at 10-11 (emphasis added); see also Revised AOE Report at 35.

Similarly, during the September 9th Consulting Party meeting, you made clear that the NPS has made a final decision to implement the Arch Proposal as currently designed and at the current proposed location, and that NPS would not consider design changes or alternative locations. You explained the NPS's rationale for this decision as follows:

"The basis for the location of this particular arch is due to what is enacted in the 1925 Arlington Memorial Bridge Act, which specifies the specific location along with vertical elements to which a different location would not fulfill the same purpose as the act requirement for the arch. We looked at design changes, and over the years, elliptical plazas, cross-axis monumental pavilions, and two columns had been presented over many years that were never realized. It was determined that the current design best meets the project purpose and need and fulfills the intentions of the Arlington Memorial Bridge Commission Report from 1924 and the Act of 1925. The determination was made that no reasonable avoidance alternative exists."
https://www.nps.gov/media/video/view.htm?id=D72EFC1E-63E0-4D5E-9DDC-4CC28B53ED2B

In response to questions by the Consulting Parties as to how a massive arch could be seen as "completing" a proposal for two slender columns, you replied, "In our view, we are performing what was originally intended."

As discussed further below, it is our view that the NPS's assertion that the proposed arch is intended to "complete a historically contemplated commemorative feature at Memorial Circle" is not supported by the record.

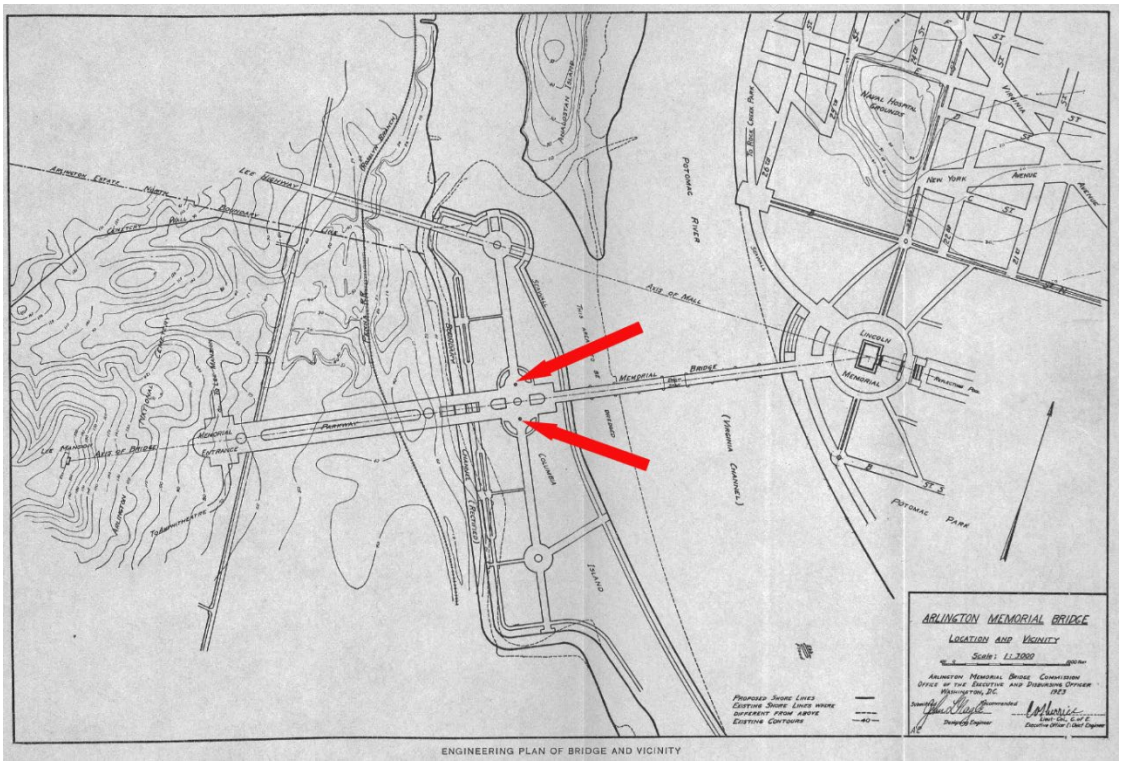
The Historical Record: What the Bridge Commission Actually Proposed in 1924

The *entire* discussion of the design concept for Columbia Island in the Report of the Arlington Memorial Bridge Commission (Senate Doc. No. 95, 68th Cong., 1st Sess., 1924) ("1924 Commission Report") is as follows:

"Even before the reclamation of Columbia Island by the dredging operations of the Corps of Engineers had advanced materially it was always considered as a suitable site for formal

park treatment, a fitting end for the Memorial Bridge, as well as an important feature in itself. Being so intimately related to the bridge, it was thought proper that the plans for the ultimate development of Columbia Island as a park should be included as part of the project for the Memorial Bridge. Accordingly, the lines of the shore of the island have been somewhat rectified to permit a cross axis almost perpendicular to the main axis of the bridge and extending the full length of the island. The intersection of these two axes has suggested a plaza with fitting architectural adornment *in a measure supplemental to the Lincoln Memorial across the river, and for this purpose two stately columns are proposed to be erected here, framing in but not interfering with the view of the Lincoln Memorial from the direction of the Lee Mansion*. These columns symbolize the one the North and the other the South. They are surmounted by statues of Victory, the stylobates whence they rise offering surfaces suitable for decorations, bas-relief, and inscriptions. The columns are 166 feet high, or practically of the same height as the Calonne de Juillet in Paris." 1924 Commission Report, at 9, 40-41 (emphasis added).

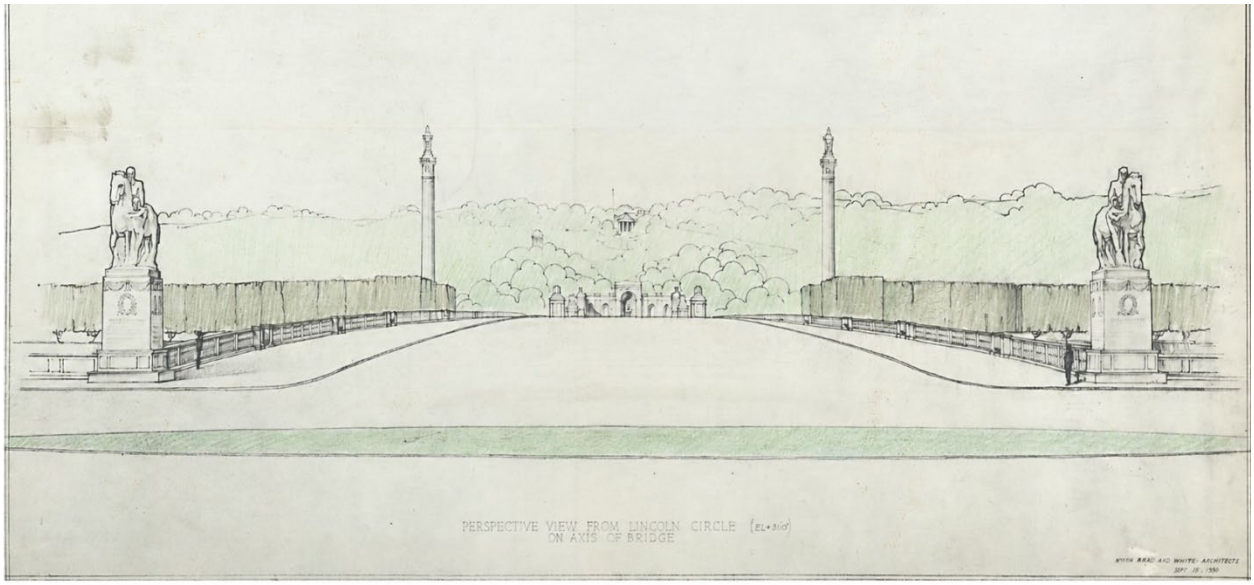
Scaled drawings accompanying the text (in plates in the 1924 report) place the two columns at approximately 300 feet apart, with diameters of less than 15 feet above the column base:



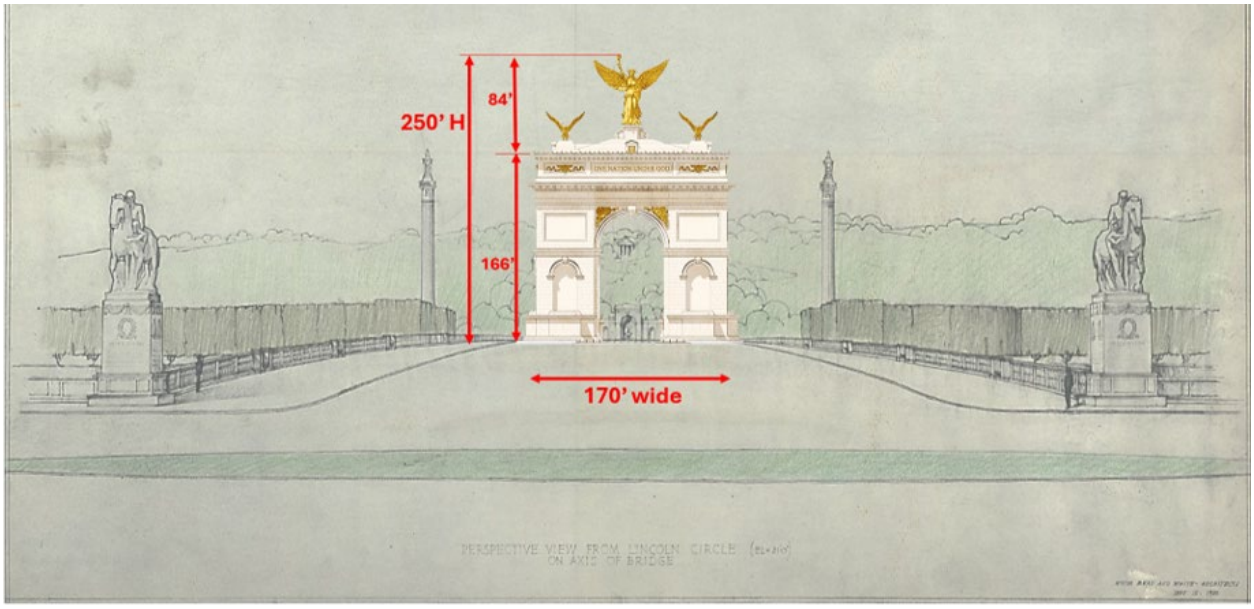
Source: 1924 Bridge Commission Report, p. 52, columns indicated with red arrows.

The distance between the columns, and their slender design, were intentional: The specific language of the 1924 Commission report makes clear that the additional architectural elements contemplated for the center of Columbia Island, i.e. the two columns, were to be (1) "supplemental" to the Lincoln Memorial, and (2) "not interfering" with the view of the Lincoln Memorial from Lee Mansion, at the heart of Arlington Memorial Cemetery. Two narrow columns 300 feet apart would have met these key 1924 design criteria; a massive triumphal arch would not.

A nearly contemporaneous rendering of a view across the proposed Memorial Bridge showing the two columns, by McKim, Mead and White, shows how open the viewshed would remain towards Arlington Memorial Cemetery.



The same view with the proposed Triumphal Arch superimposed makes clear that the proposal not only would not "complete" the 1924 design, but it is also plainly incompatible with it:



(Illustrations: *McKim, Mead & White, Architectural Records, PR42*, Department of Prints, Photographs, and Architectural Collections, New York Historical Society; Annotations by David Scott Parker, David Scott Parker Architects.)

It is impossible to reconcile these illustrations with the NPS's determination that a massive triumphal arch—more than twice the height of the Lincoln Memorial and significantly blocking views between that memorial and the Arlington Memorial Cemetery—would somehow "complete a

historically contemplated commemorative feature at Memorial Circle." In terms of size, scale, massing, and design, the proposed arch is not in any way comparable to the unbuilt columns contemplated in the 1924 design proposal; moreover, it would blatantly violate the two 1924 design criteria fundamental to the intended design of that unbuilt commemorative feature. [1]

It is the view of the Committee of 100 that the NPS's assertion that it is "completing" the earlier design concept—with a different design that violates the key stated criteria on which the original concept was based—is neither a factual nor a reasonable basis to refuse to consider less harmful alternatives as required by 36 CFR § 800.6(a).

The Historical Record (Cont'd): What Congress Actually Approved in 1925

The NPS's position appears to be that, because the 1924 design proposal by the Arlington Memorial Bridge Commission was approved by Congress in legislation in 1925, and because commemorative additions were part of that design (notwithstanding the obvious differences between two narrow columns and a massive triumphal arch), the NPS proposal is simply implementing the stated intention of the Congress. A closer review of the 1925 statute reveals that Congress's approval was more open-ended than NPS suggests, and deferred to the Commission to approve the final design of the bridge and its environs. The Commission's final design did not include either the two columns, or a massive arch.

The 1924 Commission Report included draft legislation that expressly assumed that the design concepts included in the report were not intended to be final. Specifically, the recommended legislation would have authorized the construction of the bridge "in accordance with the design, surveys, and estimates of cost" recommended in the 1924 Commission Report, except that the Commission would be expressly authorized to "make such changes in design and location of said bridge without increasing the cost of the project as in its discretion may be found to be necessary or advisable." (1924 Commission Report, at 16.) This language was, in fact, included in the final legislation approving the project. Pub. L. No. 68-463 § 1, 43 Stat. 974 (1925). This makes clear that the final design of the project was not actually set by Congress, but left to the discretion of the Commission.

And indeed, the Commission made numerous changes to the design of the bridge project — including the Columbia Island portion—before the project was eventually constructed. A number of individuals and organizations expressed concern about the columns, both because of their height and proximity to the nearby Hoover Airport but also from a design standpoint.[2]

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[1] It is also worth noting that the 1924 design principles echoed the earlier history of planning for the memorial bridge project. Earlier designs including large arches and ornamental towers were expressly rejected. See The Cultural Landscape Foundation, *A Slap in the Face of the Lincoln Memorial*, May 17, 2026, quoting Frederick Law Olmsted, Jr.: "These towers are the most conspicuous feature of the design and are so large and elaborate as to compete with the Lincoln Memorial not only in an artistic sense but in point of cost. To eliminate them from the design would involve its complete restudy as an artistic problem. Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part."

[2] For example, Adolph A. Weinman, a member of the Commission of Fine Arts, "came to the conclusion that it might be better not to erect the columns, that they will be too massive, and as to height, might seem like two smokestacks standing there, and furthermore would be in conflict with the view of the pylons of the

Consequently, in December 1931, the Arlington Bridge Commission disapproved the proposed columns and they were eliminated from the design. Sue Kohler, *The Commission of Fine Arts: A Brief History, 1910-1995* at 26 (Commission of Fine Arts 1996).

The Commission's decision, supported by the Commission of Fine Arts, to eliminate the columns and other commemorative structures on Columbia Island cannot be seen as somehow failing to implement a design intended by Congress (or, as NPS suggests, to "complete" a Congressionally approved design); under the authority delegated by Congress, the Commission's decision to eliminate the columns superseded the 1924 design. NPS's proposal to change the commemorative landscape of Columbia Island more than a century later, with a new design that violates the key stated design criteria for the 1924 proposal, and which ignores the fact that the 1924 design was ultimately changed by the Commission under authority delegated by Congress, flies in the face of the original 1924 concept, the plain language of the statute, and the history of the Commission's actions. While the National Park Service clearly is entitled to propose a new design, it is not entitled to implement that design without complying with the various statutes mandating express Congressional approval, including the Commemorative Works Act, 40 U.S.C. §§ 8901–8909, the Height of Buildings Act, Pub. L. No. 61–196, 36 Stat. 452, and 40 U.S.C. §8106.

* * * * *

For the reasons stated above, it is the view of the Committee of 100 on the Federal City that the NPS's refusal to consider alternative locations or a no-build alternative under this unsupported rationale is inconsistent with the requirements of the agency's obligations under 36 CFR § 800.6(a). We again urge NPS to halt further consideration of the Arch Proposal unless and until the project is expressly authorized by Congress, or unless the project is redesigned at a location and configuration that is consistent with the authority granted to the National Park Service.

Sincerely,

Judy Chesser

Judy Chesser
Chair

Paul Edmondson

Paul W. Edmondson
Member, Historic Preservation Subcommittee

cc:

Ms. Jennifer Madello, NPS - jennifer_madello@nps.gov
Mr. Jordan Hoagland, NPS - jordan_hoaglund@nps.gov
Mr. David Maloney, DC SHPO - david.maloney@dc.gov
Mr. Reid Nelson, Executive Director, Advisory Council on Historic Preservation - rnelson@achp.gov
Consulting Parties

Arlington Memorial Bridge, the Lincoln Memorial, and. the Washington Monument." Minutes of the Commission of Fine Arts, July 1, 1931, at 4.

September 16, 2026

Ms. Tammy Stidham
Associate Regional Director – Lands and Planning
National Park Service
National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

RE: DC SHPO Comments on the Assessment of Effects Report for the Triumphal Arch Project

Dear Ms. Stidham:

Thank you for providing the District of Columbia State Historic Preservation Officer (DC SHPO) with a revised Assessment of Effects (AOE) Report and related documents for the proposed Triumphal Arch Project and for hosting a second consulting parties meeting on September 9, 2026. We also appreciated receiving electronic copies of the more than 100,000 public comments we had requested from the National Park Service (NPS) on several prior occasions. Based upon our review of this additional information and our participation in the recent meeting, we are writing to provide additional comments regarding the effects of the Triumphal Arch on historic properties in accordance with Section 106 of the National Historic Preservation Act.

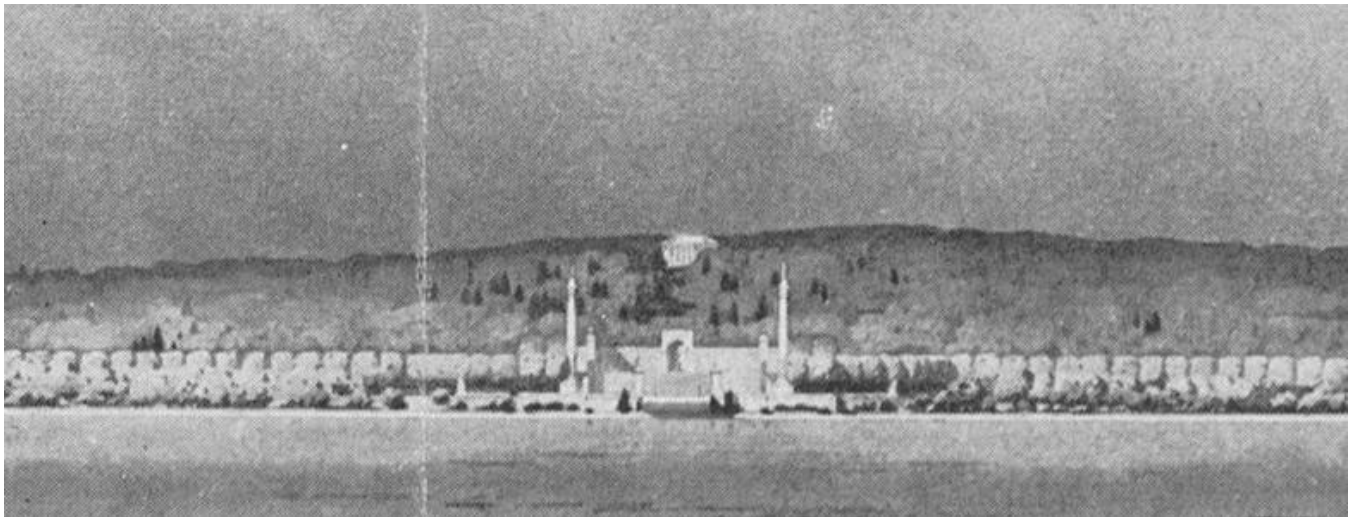
The DC SHPO concurs with the expanded Area of Potential Effect (APE) and NPS's determination that even more historic properties than originally anticipated will be adversely affected by the undertaking. According to the NPS summary tables (see attached), these include at least six National Historic Landmarks, eight historic districts, eight cultural landscapes and twenty individual properties.

However, we do not agree with every proposed finding of "no adverse effect." Theodore Roosevelt Island, for example, would also be adversely affected since its boundaries extend south of the bridge that the AOE suggests will block views of the arch. The use of 320' tower cranes for approximately one full year of construction would also cause adverse visual effects. Archaeological resources may also be adversely affected (see additional comments that follow).

In more general terms, we find that the language used to describe the nature of the adverse effects significantly underestimates the degree to which the integrity of the affected historic properties would be diminished. For example, the arch would not merely be "prominently visible." Instead, it would visually overwhelm the surrounding historic context. Likewise, the balanced architectural relationship of the Arlington Memorial Bridge complex would not merely be "altered." Instead, it would be irreparably compromised. Both these concerns are particularly relevant to the Lincoln Memorial since the proposed 250' arch would be more than twice as tall as the 99' memorial.

Foremost among our concerns with the revised AOE are the counterintuitive arguments the Purpose and Need section suggests as justification for the adverse effects. The NPS has cited the 1924 Report of the Arlington Memorial Bridge Commission and the corresponding 1925 Act of Congress authorizing construction of the bridge and related features as the legal basis for building an arch in Memorial Circle. Other sections of the AOE make similar references to suggest the arch is "inherently location dependent" and that it will somehow "complete" the McKim Mead & White design contemplated in the 1924 Report. The DC SHPO does not agree.

Obviously, neither the 1925 Act of Congress nor the design of Memorial Circle contemplated the 250th anniversary of our nation since both were completed over a century before the event. Moreover, McKim Mead & White's design envisioned two slender columns carefully situated to frame the view between the Lincoln Memorial and Arlington House and to more directly signify reunification by using one column to symbolize the North and the other, the South (see rendering below).



In stark contrast, the proposed Triumphal Arch would effectively replace much of the important view with a frame – a massive frame that would significantly narrow and restrict, if not completely obstruct portions of the view corridor. And since the proposed arch does not symbolize reunification in any way, it would be more accurate to describe the current proposal as antithetical to McKim Mead & White's design and the 1925 Act than to suggest it will fulfill or complete them in any way.

A triumphal arch would also run counter to the fervent opposition expressed by a significant majority of the more than 100,000 public comments the NPS solicited but does not appear to be heeding. We are still analyzing the massive electronic files, but our efforts thus far demonstrate that a majority of comments in opposition to the arch were submitted from all fifty states and most, if not all, U.S. territories. Matching, or possibly exceeding the national trend, approximately 93% of the roughly 11,000 comments submitted from within the District of Columbia expressed very strong opposition to the proposal.

Given the overwhelming public objections and related consulting party concerns, one would expect the AOE to offer some sort of generalized responses or at least justifications for why the comments are being disregarded. However, the only acknowledgment appears to be a public comment summary which downplays the volume of opposition by consistently using the ambiguous qualifier "some" to describe the number of objections. The consulting party comment summary merely lists the comments and provides no response of any sort. For these reasons, the DC SHPO requests the NPS to develop responses that, at a minimum, respond to the various headings under which the public comments were categorized (e.g. individual cultural resources, visitor experience, etc.).

In addition to a lack of credible support for an arch in historic designs, past acts of Congress or current public opinion, what the AOE underscores more than anything is that the NPS has still failed to meaningfully identify and evaluate alternative designs or locations that could avoid or minimize the project's multiple adverse effects. Consideration of smaller arches and the dismissal of the South Capitol Street alternative site we previously suggested fail to constitute adequate consideration of alternatives, especially in light of the number and nature of the adverse effects.

Since NPS seems convinced that Memorial Circle is the most fitting site for a commemorative monument, we request meaningful consideration of an alternative that more accurately reflects the spirit and intent of the 1924 McKim Mead & White design and the 1925 Act of Congress. Specifically, we request the NPS to evaluate design concepts consisting of two columns that truly frame, rather than limit the historic view corridor. We maintain that the development and meaningful consideration of some such alternative designs and/or alternative locations is essential for the NPS to comply with the most fundamental requirements of Section 106 for this undertaking.

With regard to archaeology, the NPS determined that Phase I archaeological identification survey was warranted but the draft Phase IB workplan received by the DC SHPO on August 24, 2026, was not approved. Following consultation with NPS on September 9, 2026, the archaeological consulting team is revising the draft archaeological workplan to include geoarchaeological coring and analysis by a qualified geoarchaeologist. The need for and locations of subsequent Phase IB mechanical trenching will be determined during consultation when the results of the geoarchaeological investigations are available. Until the identification survey is complete and identified resources are evaluated, the DC SHPO will be unable to assess the effects of this undertaking on archaeological resources.

If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to receiving the information requested in this letter at your earliest convenience and to consulting further with all parties to continue the Section 106 review of this undertaking.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
District of Columbia State Historic Preservation Office

TRIUMPHAL ARCH ADVERSE EFFECT SUMMARY TABLES

Historic Properties

	Total Assessed	Adverse Effect	No Adverse Effect
National Historic Landmarks	**31**	**6**	25
Historic Districts	**53**	**8**	45
Cultural Landscapes	**10**	**8**	2
Individual / Other Historic Properties	**167**	**20**	147
TOTAL	**261**	**42**	**219**

Historic Properties – Adverse Effect

National Historic Landmarks — 6
- Fort Myer NHL District
- Georgetown Historic District
- National War College
- Old Naval Observatory
- Pentagon
- United States Capitol

Historic Districts — 8
- Arlington National Cemetery Historic District
- Arlington House Historic District
- Mount Vernon Memorial Highway Historic District
- National Mall Site and National Mall Historic District
- Washington Monument and Grounds Historic District
- Rock Creek and Potomac Parkway Historic District
- East and West Potomac Park Historic District
- Observatory Hill Historic District

Cultural Landscapes — 8
- Memorial Avenue Corridor Cultural Landscape
- Lady Bird Johnson Park Cultural Landscape
- Arlington House Cultural Landscape
- Lincoln Memorial Cultural Landscape
- The Mall Cultural Landscape
- Washington Monument and Grounds Cultural Landscape
- Thomas Jefferson Memorial Cultural Landscape
- Mount Vernon Memorial Highway North Cultural Landscape Inventory

Individual / Other Historic Properties — 20
- Arlington Memorial Bridge and Associated Features
- Arlington House (Robert E. Lee Memorial)
- Lyndon B. Johnson Memorial Grove
- Lincoln Memorial
- World War II Memorial
- Washington Monument
- L'Enfant Plan of the City of Washington, District of Columbia
- Arlington Ridge Park
- George Mason Memorial
- Thomas Jefferson Memorial
- Alban Towers Apartment Building
- American Institute of Pharmacy Building
- George Washington Memorial Parkway
- Halcyon House
- Francis Scott Key Bridge
- National Cathedral
- Vigilant Firehouse
- Bridge #5020 / State Bridge #5020
- Old Warehouse Area and Ground Maintenance Complex
- Frederick Douglass National Historic Site

September 16, 2026

FROM: Stephen E Hammond
Spokesperson for Family Circle of Descendants at Arlington House
shamm63989@gmail.com

TO: Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
tammy_stidham@nps.gov

Ms. Stidham,

This letter is in response to the National Park Service (NPS) request for comments from consulting parties regarding the revised Triumphal Arch at Memorial Circle Assessment of Effects (AoE) Report, dated August 2026. We appreciate the opportunity to comment and participate in the consulting party meeting held on September 9th.

As a consulting party we are extremely concerned with how NPS is conducting this assessment. I write 'conducting' versus 'conducted' because there is still time for the NPS to take the necessary actions to follow the spirit of Section 106 guidelines. Although the Section 106 process is intended to be a collaborative, input-seeking process, it seems quite clear after the Sept 9th consultation meeting that the NPS and Department of the Interior have a directive and have made a decision on how they intend to proceed on this project despite the concerns of consulting parties. On Sept 9th, multiple consulting parties had questions and expressed concerns. In many cases, NPS either avoided answering the questions or stated no alternative exists and a decision had been made, or brushed off the comment with "I understand" and moved on to the next question.

The AoE states the following: "The purpose of the proposed undertaking is to celebrate 250 years of American independence by honoring America's founding principles through installation of an arch at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage."

The Family Circle of Descendants at Arlington House (Family Circle) consists of people whose ancestors were enslaved and enslavers at the Arlington House. We have come together to reclaim the narrative at Arlington House so that it is inclusive of the entire history there, not only Robert E. Lee's history. Our goal is to serve as a role model for how our country can be healed and repaired. Few visitors know the entire Arlington House history. Installation of an arch cannot

heal, repair or convey the entire history within the space it may consume. The Family Circle seeks to inspire Americans to **R-E-A-C-H** our potential.

> **Reflect** on our history understanding that it has not all been positive
> **Educate** ourselves so that we have a more complete understanding of our nation's history
> **Acknowledge** that we, as a country, aspire to become a more perfect union
> **Celebrate** how far we have come as a nation while recognizing that we're not 'there' yet
> **Honor** those who have sacrificed and given their lives and of themselves to build and sustain our nation

An arch is not needed to accomplish the **REACH** goals listed above. The Memorial Bridge, along with Memorial Circle and the Memorial Avenue entrance to the Arlington National Cemetery were designed to create a physical and symbolic connection between the North and South: between the Lincoln Memorial and the Arlington House. Despite the Memorial Circle location inside of Washington, D.C., the symbolism and the physical location of a triumphal arch on that Memorial Circle site strongly suggests to many that the triumph is associated with the South having won the Civil War. The Family Circle includes descendants of Robert E. Lee. We know this perception is false, but perceptions are critical to creating and elevating a narrative. The existence of this proposed arch will pick at that sore of division and divide us further. This arch does nothing to celebrate our history or to heal and repair ongoing divisions in this nation.

Arlington House provides an outstanding natural vista of Washington, D.C. that shifts with the seasons. Through their labor, the enslaved ancestors of the Family Circle descendants created that vista that has been there for 208 years. It has been enjoyed and treasured by countless millions of visitors. The view is one of the defining characteristics that placed Arlington House on the National List of Historic Places. That characteristic deserves to be preserved. Construction of an arch will introduce a new prominent vertical element within a historically designed landscape whose significance is tied to axial relationships, ceremonial movement, open views, and reciprocal vistas between Washington, D.C. and Arlington House. The ground elevation at the Arlington House is approximately 205 feet above sea level. The elevation at the top of the proposed arch is 265 feet above sea level. Therefore, the top of the proposed arch is about 60 feet higher relative to sea level than the hill at Arlington House.

We are primarily concerned with the negative impact and interruption by an arch on the entire Area of Potential Effect, but specifically on Arlington House the Robert E. Lee Memorial, the Arlington House Historic District, Arlington National Cemetery and the Lincoln Memorial. If built, a 265-foot arch would destroy that panoramic vista. At a minimum the arch would adversely affect the sites listed above. The adverse effect of the destruction of that Arlington House panoramic-vista cannot be avoided, mitigated or minimized by NPS. To that end, we believe that NPS has not adequately addressed the requirements of Section 110(f) of the NHPA, which requires federal agencies, to the maximum extent possible, to undertake planning and

actions necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking.

Based on NPS's own findings of adverse effects, the Family Circle believes that this process should include meaningful consultation about whether those adverse effects can be avoided, not simply how they might be mitigated when the revised AoE already treats the selected location and the presence of a monumental vertical feature as fundamental parameters of the undertaking.

The revised AoE itself recognizes that mitigation measures that document, interpret, or compensate for adverse effects after they occur do not negate an adverse-effect finding. That distinction is important to the Family Circle. Our concern is not simply what interpretive material, documentation, or other mitigation might accompany construction of the Arch. Our concern includes whether permanent adverse effects to the historic landscape can and should be avoided in the first instance.

Several members of our Family Circle are descendants whose ancestors were enslaved by Martha Washington and managed by George Washington. Upon Martha Washington's death, dozens of enslaved people were inherited by her grandson, George Washington Park Custis. He brought them to the Arlington property that overlooks Washington, D.C today and has become the resting place of honored heroes in Arlington National Cemetery. Our ancestors were forced to clear the land, make the bricks and build the plantation house that would originally be named Mt. Washington to honor the first President. In this case, multiple things can be true. George Washington grew into a great leader; he helped establish the United States; and he served as our nation's first President. But George Washington also enslaved our ancestors. A 265-foot arch is not needed to celebrate America or its triumphs to **REACH** its potential.

Unfortunately, construction of an arch does not represent the experiences of all Americans. The Family Circle of Descendants at Arlington House includes people whose ancestors were enslavers of people brought to this country for one purpose, to serve as an economic engine to a fledgling constitutional republic and a representative democracy. While the institution of slavery was not a formal founding principle of the United States, it was a deeply entrenched pre-existing economic institution. It was the subject of major compromises during the nation's creation. Ultimately, the framers intentionally left the words "slave" and "slavery" out of the final draft of the Declaration of Independence because Georgia and South Carolina refused to join the new union without legal protections for slavery. George Washington could have taken steps to end the practice of slavery, but he did not. This is part of our history that we must acknowledge and understand. A triumphal arch is an injustice to the millions of enslaved individuals and their descendants at both the Arlington House plantation and everywhere else slavery has been a practice across the nation.

Based on the NPS' current approach there appears to be little chance to reach a compromise with consulting parties on this project. The problems and challenges associated with this project cannot be mitigated or minimalized by the National Park Service. In order for our nation to

succeed over our first 250 years, we have had to manage struggle and persevere through hatred. A triumphal arch cannot reflect that. A triumphal arch cannot change that history and we are remiss if we exclude or attempt to candy-coat the facts.

The projected cost of the triumphal arch is about 100 million dollars. For a tiny fraction of the cost for that effort, the Family Circle believes there is another way to commemorate this moment in our nation's history. Legislation is pending in Congress to redesignate Arlington House as the 'Arlington House National Historic Site.' That redesignation would modify the site's federal designation; it would not change the historical fact of Robert E. Lee's association with Arlington House. Rather, it would allow that association to be interpreted within the considerably larger history of Arlington House and the many people whose lives are connected to it. That is the purpose behind **REACH: Reflection, Education, Acknowledgment, Celebration, and Honor**. It asks Americans neither to diminish our nation's achievements nor to avert our eyes from the painful portions of our history. It asks us to understand both as we together strive to meet our full potential as individuals and as a nation.

As descendants of people who stood on different sides of that history at Arlington House, we believe that distinction matters. Our ancestors include the enslaved and the enslavers. We have chosen to come together not because we agree about every interpretation of the past, but because we believe our nation is better served when the entire history is told.

For the Family Circle, the landscape extending from Arlington House across Arlington Memorial Bridge to the Lincoln Memorial already tells a deeply American story: slavery and freedom, Civil War and reunion, sacrifice and citizenship, contradiction and progress. We ask the National Park Service to preserve the integrity of that landscape, to engage its consulting parties meaningfully in determining its future, and to consider whether America's 250th anniversary can be commemorated in a way that adds understanding to that story rather than physically or symbolically overwhelming it.

The NPS can address this now if it chooses. As a consulting party who cares deeply about this space and is directly impacted by decisions being made, we are prepared to collaborate. Family Circle of Descendants at Arlington House concurs with recent comments by other consulting parties. We look forward to continued and substantive consultation that meets, at the very least, the spirit of the National Historic Preservation Act. Section 106 consultation is intended to involve the seeking, discussing and considering of consulting parties' views and, where feasible, the seeking of agreement. We therefore ask NPS to explain how the concerns raised by the Family Circle and other consulting parties have been considered; to continue consultation regarding avoidance, minimization and mitigation of the identified adverse effects; and to do so before reaching a final decision on how this undertaking will proceed.

September 16, 2026

Tammy Stidham
Associate Regional Director, Lands and Planning
National Park Service, National Capital Region

Cc: Jordan Hoaglund, Priority Project Coordinator, National Park Service
Jennifer Madello, Superintendent, George Washington Memorial Parkway, National Park Service

RE: NPCA Comments on the Revised Assessment of Effects, Proposed Triumphal Arch at Memorial Circle, George Washington Memorial Parkway

Dear Ms. Stidham:

On behalf of the National Parks Conservation Association (NPCA) and our more than 1.9 million members and supporters, we submit these comments regarding the revised Assessment of Effects transmitted August 28, 2026, together with its appendices. These comments address the updated documents, reflect what consulting parties heard at the September 9 consulting party meeting, and renew several requests we first made in June and again on August 5 that remain unanswered.

We credit the work the National Park Service has done since June, some of which responds to what consulting parties asked for. What that work has produced, however, is a fuller account of a proposal that should not go forward at this location. The record now identifies 261 historic properties within the Area of Potential Effects and finds adverse effects to dozens of them, six of which are National Historic Landmarks. The agency's own findings conclude that the Arch would obstruct the views to the Washington Monument, Arlington House, the Lincoln Memorial, and the Capitol dome, which are the very views that define the Memorial Avenue corridor. No amount of documentation, interpretation, or landscape rehabilitation restores an obstructed view, and NPS has not claimed otherwise.

We reject the avoidance analysis in this document. NPS has written a purpose that only one site can satisfy, declined to study any alternative location or any reduced design, and then presented the absence of alternatives as a finding. That is not a good faith effort to avoid harm. It is a justification assembled after the fact for a decision that appears to have already been made.

I. This undertaking still lacks congressional authorization

We have asked NPS in every letter since June to identify, in writing, the statutory authority under which it believes this project may proceed, and we have received no answer. The revised Assessment of Effects cites Executive Order 14252 as the basis for the undertaking. An executive order directing the Secretary to develop proposals is not authorization to build a permanent commemorative structure on federal parkland, and it does not displace the framework Congress established, the Commemorative Works Act, for how commemorative works in Washington and its environs are authorized, sited, and approved. At the September 9 meeting, NPS staff identified the 1925 Arlington Memorial bridge Act as the authorizing bill for the undertaking, while acknowledging that the Act does not refer to an arch and that the 250th anniversary formed no part of the Act or the 1924 report. A statue that delegated final design decisions to a Commission which then chose not to build the structures it had contemplated does not authorize a different structure a century later. We renew our request for a written statement of authority.

II. The scale of this proposal is without precedent in the monumental core

Washington's monumental landscape is deliberately horizontal, and it has been kept that way for more than a century by design and by law. The Arch would rise 250 feet, more than double the height of the Lincoln Memorial it would stand in front of and would exceed every building in the District. It would contain 70,072 square feet across five levels, with exhibit space, restrooms, the possibility of a café and gift shop, five elevators, six stairways, a security screening area with magnetometers and x-ray equipment, and a 9,812 square foot observation deck 161 feet above grade. Nothing of that character has been built in this landscape. The Washington Monument is the only structure in the monumental core with a public observation deck, and NPS now proposes a second one, in a traffic circle, at the gate of a national cemetery.

The consequence is permanent and it is not confined to the properties in Appendix L. Anyone arriving in Washington across Memorial Bridge, anyone standing at the Lincoln Memorial and looking west, anyone visiting a grave at Arlington, and anyone driving the Parkway would experience a different city than the one that exists today and would do so for as long as the structure stands. That is the change this record documents, and it cannot be mitigated.

III. The location is inappropriate, and others should be considered

NPS acknowledges in the revised assessment that relocation would avoid some adverse effects, and rejects it on the ground that moving the Arch would sever the project from the historic planning precedent that supplies its rationale. Because the purpose has been drafted around a single site, the resulting absence of alternatives is treated as a conclusion rather than as a consequence of how the purpose was written. Section 106 asks whether harm can be avoided or minimized, and that question cannot be answered by refusing to examine the options that would avoid it.

NPS states that reduced Arch heights were dismissed in part because they were not considered representative of the 250th anniversary milestone. A less harmful design was therefore set aside because its height in feet did not match a number of years. We are not aware of any principle of historic preservation law under which numerical symbolism outweighs the statutory duty to minimize harm, and we ask NPS to withdraw that rationale.

NPS grounds the undertaking in the 1924 Report of the Arlington Memorial Bridge Commission, but by the agency's own account that concept called for two freestanding columns representing national reunion, which were scaled back during the 1930s and ultimately replaced with smaller sculptural pavilions. Two columns flanking an axis are not an occupied building spanning it. A design that was considered and deliberately abandoned a century ago is not a precedent that this project completes.

At the September 9 meeting, NPS stated that for this project it is not considering alternative locations or changes in design, and that only different sizes of the same structure were evaluated. NPS also offered a rationale for rejecting smaller heights that does not appear in the written assessment, namely that they blocked views rather than framed them. Both State Historic Preservation Officers stated on the record that they do not accept that this design is location dependent. We ask NPS to produce the height alternatives it states it evaluated, the analysis behind their rejection under each rationale it has offered, and renderings of those alternatives from the vantage points used in Appendix H, and to develop and circulate a genuine range of alternative locations, including those the District of Columbia State Historic Preservation Officer has identified.

IV. This would change the character of use of the nation's ceremonial route into Arlington National Cemetery, and the assessment does not evaluate it.

Memorial Avenue and Memorial Circle are not ordinary roads, but the route along which the nation escorts its fallen into Arlington, and that use is a character-defining feature of both the Memorial Avenue corridor and the cemetery's historic district. Because a change in the character of a property's use is an adverse effect, we would expect the assessment to evaluate one, and it does not.

What the transportation appendix proposes is a fundamental reworking of how this interchange functions. NPS would fully signalize Memorial Circle, add eight signalized pedestrian crossings into its center, eliminate every existing yield and merge movement, narrow the circulating roadway to roughly twenty feet, and install forty-eight traffic signal systems. Memorial Circle is one of the most heavily used points in the region, connecting Arlington National Cemetery, the Pentagon, Reagan National Airport, Arlington Memorial Bridge, I-395 and Route 27, Route 50, and the District. It carries some 16,700 vehicles a day today and is projected to carry 22,500 by 2046. Converting a free-flowing rotary of that consequence into a signalized intersection is a permanent change to the daily lives of the people who live and work in this region, and the assessment characterizes it only as an improvement to visitor safety.

The construction period would be worse still. Over two to three years, the south half of Memorial Circle would close while two-way traffic detoured to the north side, westbound traffic from Memorial Bridge would drop to two lanes, the eastbound turn from Memorial Avenue to northbound Arlington Boulevard would be prohibited, northbound traffic from Washington Boulevard would be barred from the circle entirely, and the sidewalk on the south side would be rerouted. The traffic control sheets show a signed detour reading “Memorial Circle Closed, Arlington Ahead.” For commuters, that is years of disruption at a choke point with no practical alternative. For Arlington, which conducts thousands of services each year, it means funeral processions moving through an active construction zone, and the record does not estimate how many, or what delays they would face, or what that would mean for families arriving to bury someone.

Visitation goes unaddressed altogether. A destination of the size described above, placed in the entrance sequence of a national cemetery, will draw crowds, and the record contains no visitation estimate, no parking or bus staging analysis, and no assessment of how visitor traffic would interact with funeral traffic or with regional commuting. The sole accommodation is a pickup and drop-off zone on Memorial Avenue, which is to say on the procession route itself.

Before it issues a finding, we ask NPS to prepare a traffic operations analysis comparing the signalized circle to existing conditions for current and projected volumes, a projection of visitation together with its parking and staging demand, an analysis of construction-period and permanent effects on cemetery operations developed with Arlington National Cemetery and the Department of the Army, an assessment of emergency access, and an express finding on whether the undertaking changes the character of use.

V. Veterans Organizations and Landmark Stewards Still Have Not Been Invited

We have raised this consistently, and it remains true today that no veterans service organization and no organization representing the families of those buried at Arlington is a consulting party in this review. NPS has concluded that the Arch would adversely affect the Arlington National Cemetery Historic District, Arlington House, the Memorial Avenue corridor along which the nation escorts its dead, Arlington Ridge Park and the Marine Corps War Memorial within it, Fort Myer, the Pentagon, and the National War College, and there is no remaining explanation for their absence from the table.

The same gap extends to the institutions that built, own, or care for the properties NPS now says would be harmed, several of which are private organizations that have never been told a federal project has been found to harm their property. We ask NPS to send written invitations to consult, and to document those invitations to the consulting parties, to organizations such as:

- Veterans service organizations, including The American Legion, Veterans of Foreign Wars, Disabled American Veterans, AMVETS, Paralyzed Veterans of America, Vietnam Veterans of America, Iraq and Afghanistan Veterans of America, and the Military Order of the Purple Heart;

- Organizations representing the families of the fallen and of those buried at Arlington, including Gold Star Wives of America, American Gold Star Mothers, the Tragedy Assistance Program for Survivors, and the Society of the Honor Guard, Tomb of the Unknown Soldier;

- The organizations that built and steward the affected memorials, including the Military Women's Memorial at the Arlington Hemicycle, the Vietnam Veterans Memorial Fund, the Korean War Veterans Memorial Foundation, Friends of the National World War II Memorial, and the Marine Corps Heritage Foundation;

- The owners and stewards of the Landmarks and other properties NPS says would be harmed, including the Protestant Episcopal Cathedral Foundation, Georgetown University, the George Washington University, the National Society Daughters of the American Revolution, the National Academy of Sciences, Tudor Place, Dumbarton House, the Washington Canoe Club, and the Embassy of the Kingdom of the Netherlands as steward of the Netherlands Carillon;

- Preservation and civic organizations, including the Arlington County Historical Affairs and Landmark Review Board, the Alexandria Board of Architectural Review, and the affected Georgetown, Foggy Bottom, and Arlington Ridge citizens associations; and

- Federally recognized Tribes, on a government to government basis, with that consultation documented to the consulting parties.

We note that the NPS National Historic Landmarks Program recommended at the September 9 meeting that NPS consult directly with the owners of the adversely affected Landmarks. We agree, and that consultation should begin with a written invitation to participate. Please provide a roster of the current consulting parties ahead of the next convening.

VI. The Review Schedule and the Choice of a Programmatic Agreement Do Not Fit This Project

NPS transmitted the revised Area of Potential Effects, the property list, the viewshed analysis, and the effects tables at the end of the day on July 28 and asked for written comment by August 6, which is seven business days. That follows the ten days consulting parties were given in June to review the original assessment of effects and the draft agreement, a window to which both State Historic Preservation Officers objected at the time. Consulting parties are now being asked to advise on the application of the criteria of adverse effect to 261 historic properties, with the first consulting party meeting of this review convened on September 9, one week before comments were due, without visual simulations, and without any written response to the comments and objections already filed. We ask NPS to extend the deadline by at least 60 days, to convene a further consulting party meeting before any finding is issued, and to circulate a written response to the comments received to date. NPS indicated at the meeting that it wishes to move toward a memorandum of agreement. Both State Historic Preservation Officers responded that discussion of an agreement is premature and that mitigation is unlikely to be the answer to effects of this severity. We agree.

The questions of authority, alternatives, and effects must be resolved before any agreement document is drafted.

At the September 9 meeting, NPS confirmed that the project has not been submitted to the National Capital Planning Commission for final review and will not be on the Commission's October agenda. NPS stated that it anticipates submitting in November if Section 106 can be concluded by the Commission's submission deadline. We appreciate the confirmation as to October, and we ask that the November target not be permitted to set the pace of this consultation. Section 106 cannot be concluded on that timeline given what remains unresolved, and final Commission action taken while consultation remains unfinished would prejudge the outcome the process is meant to protect.

VII. The Environmental Review Should Be Reopened

When NPS issued its Finding of No Significant Impact on June 18, it had not completed the identification of historic properties, had not drawn the Area of Potential Effects it now describes as final, and had not conducted the viewshed analysis that produced most of the adverse effect findings now before consulting parties. The finding also carried no mitigation. It is difficult to reconcile a conclusion of no significant impact with an administrative record that, six weeks later, documents adverse effects to 42 historic properties, six of them National Historic Landmarks, and with adverse effect determinations that NPS acknowledges it is still in the process of revising.

Because the environmental analysis and the Section 106 record have now diverged this far, we ask NPS to reopen the environmental review, incorporate the identification and effects work completed since June, and provide the public a further opportunity to comment on the analysis as revised. NPS stated at the September 9 meeting that it plans to update the environmental assessment to reflect the additional adverse effects but does not plan to take public comment on the updated document. An assessment revised to account for 42 adverse effects, six of them to National Historic Landmarks, is a materially different document from the one the public reviewed, and it should be circulated for comment. Our position remains that an environmental impact statement is warranted for a project of this scale and effect, but at a minimum NPS should withdraw the Finding of No Significant Impact and issue a revised environmental assessment that reflects what its own staff have since found.

VIII. Alternatives Belong on the Table Now

The District of Columbia State Historic Preservation Officer has identified other locations, including the vicinity of the Frederick Douglass Memorial Bridge, that would not produce these effects, and additional candidate sites are already listed in the Commission's Memorials and Museums Master Plan. An agency cannot reasonably determine whether harm is capable of being avoided while declining to examine the options that would avoid it.

We therefore ask NPS to develop and share with consulting parties, before it issues a finding, an alternatives analysis that includes the locations the District of Columbia State Historic Preservation Officer identified, the sites in the Memorials and Museums Master Plan, substantially smaller designs at the current site, other ways to mark the 250th anniversary that would not require a permanent monument in this landscape, and a no action alternative treated as a genuine choice.

NPCA will remain at the table as a consulting party. We note the Secretary's September 3 statement that construction would begin within two weeks, which NPS explained at the meeting as a reference to Phase 1B archaeological work. We ask NPS to confirm in writing that no ground disturbance beyond archaeological identification will occur before Section 106 is complete, and that NPS make its effects

determination and reconvene consulting parties before any further commitment of resources.

Sincerely,



Edward Stierli
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National Trust for Historic Preservation®

September 16, 2026

Tammy Stidham
Associate Regional Director – Lands & Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

via email: tammy_stidham@nps.gov

Re: Proposed Triumphal Arch at Memorial Circle, Washington, DC

Dear Ms. Stidham,

The National Trust for Historic Preservation ("National Trust") thanks the National Park Service ("NPS") for the opportunity to comment on the revised Assessment of Effects Report for the proposed Triumphal Arch at Memorial Circle. The National Trust also appreciates NPS's extension of the comment deadline to September 16th. As we have stated in previous letters, the Section 106 consultation for this undertaking is unreasonably rushed, especially given the extraordinary magnitude of the proposed project's adverse effects, and the unparallel national significance of the dozens of historic resources that would be adversely affected. The National Trust believes that it is also necessary for NPS to pause this consultation to address multiple critical, unresolved issues of national importance, including significant deficiencies regarding compliance with established statutory and regulatory requirements.

One of these critical issues is that NPS is required by the NHPA and its implementing regulations to seek to avoid and minimize adverse effects, yet it has failed to do so. 54 U.S.C. §§ 306101-02, 306108, 306131; 36 C.F.R. § 800.6(a). The Assessment of Effects further documents NPS's refusal to consider any changes to the location, height, scale, mass, or design of the proposed Arch. NPS's refusal to consider such avoidance or minimization measures is a violation of NPS's legal responsibilities and has rendered this Section 106 consultation virtually meaningless. More recently, the late afternoon release on September 15 of a Memorandum of Agreement that the consulting parties have only 3½ business days to review – without even waiting for comments to be received on the Revised Assessment of Effects – confirms the perception that the NPS is merely going through the motions and has no intention of taking into account the effects of the project or responding to any comments.

Even simple, common sense design changes that would help avoid adverse effects have been barred from consideration. For example, the National Trust is deeply concerned by the proposed Arch's elevated observation deck. It is extremely disrespectful to construct a platform from which tourists will be able to look down into Arlington National Cemetery

and witness and even photograph the funeral services of our nation's fallen heroes. The Assessment of Effects simply ignores this outrageous adverse effect, even though it could be easily avoided by eliminating the observation deck from the design.

Similarly, the Assessment of Effects fails to reasonably consider many of the disrespectful adverse effects that the rushed construction of the proposed Arch will inflict upon Arlington National Cemetery. The proposed construction timeline is 2-3 years, during which construction will be 7 days a week, 20 hours a day.[1] During that time, there will continue to be as many as 27 funeral services conducted at Arlington National Cemetery per day.[2] Yet the Assessment of Effects fails to consider specific measures to avoid or minimize the effects of construction on those services, and NPS refuses to explore any avoidance or minimization options that would require significant changes to the proposed Arch's design or construction timeline.

Consider that the rules of Arlington National Cemetery require visitors to "speak quietly" and "respect funeral services" so that "each funeral is executed with the utmost dignity and respect".[3] Federal law bans musical instruments, loudspeakers, and audio devices within Arlington National Cemetery. 32 C.F.R. § 553.33(9). NPS is now proposing to subject this sacred space to years of loud, intrusive construction noise and disruption, while placing a massive new structure within its historic viewshed.

NPS's assertion that they will coordinate with Arlington National Cemetery to avoid or minimize construction noise and traffic impacts to funeral services is impossible given the number of funeral services conducted daily and the pace of construction proposed. The construction timeline for the Arch and the scale of its construction due to its massive size is simply incompatible with the number of funeral services conducted daily at Arlington National Cemetery. NPS must further evaluate this undertaking's likely adverse effects related to construction activities and develop specific restrictions that ensure appropriate respect for the funeral services of our nation's heroes.

The National Trust is additionally concerned that multiple other aspects of this consultation are in clear violation of the law. For example, the proposed undertaking is in violation of the Commemorative Works Act, 40 U.S.C. §§ 8901–8910, and the Height of Buildings Act, Pub. L. 61-196, 36 Stat. 452. There is no evidence that Congress has authorized this undertaking as required by the Commemorative Works Act, nor has the Height of Buildings Act been amended to permit the proposed Triumphal Arch to exceed 130 feet (as it was for previous buildings allowed to exceed that limit). NPS cannot advance a Section 106 consultation where the subject undertaking is illegal. The National Trust again urges NPS to pause this consultation to deal with these serious issues.

Any suggestion that this undertaking was somehow authorized by Congress via its adoption

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[1] Pg. 11, ¶ 1, Final Assessment of Adverse Effects.

[2] https://www.arlingtoncemetery.mil/Funerals/Attending-a-Funeral.

[3] https://www.arlingtoncemetery.mil/Visit/Visitor-Tips *and* https://www.arlingtoncemetery.mil/Funerals/Attending-a-Funeral.

of the 1924 Report of the Arlington Memorial Bridge Commission, or that this proposed undertaking is somehow consistent with that report, is ridiculous on its face. The adoption of a report recommending two slender 166-foot columns at Memorial Circle cannot be reasonably construed to authorize the construction of a massive, bulky 250-foot Arch. The difference between the two proposals is dramatic and obvious. The adoption of a report by Congress almost 100 years ago also cannot provide authorization for a newly proposed project. In any event, if this project is supposedly an execution of the 1924 Report, we agree with the DC State Historic Preservation Office that the NPS must at the very least evaluate alternatives that literally incorporate the 1924 McKim Mead & White design, with two narrow columns limited to 166 feet in height and separated by 300 feet.

Before proceeding to the next step of the Section 106 consultation process (which NPS has already improperly invoked), a number of legal deficiencies must be addressed and corrected, in addition to the Commemorative Works Act and the Height of Buildings Act, For example:

- **NPS has failed to identify all historic properties within the Area of Potential Effects**. During the September 9 consultation meeting, Arlington County and the Virginia SHPO both pointed out that the identified historic properties included only properties listed in the National Register of Historic Places, but the NPS failed to include properties *eligible* for the National Register, as required by the Section 106 regulations, 36 C.F.R. § 800.16(*l*). This egregious omission must be corrected before moving on to considering how the adverse effects can be avoided, minimized, and/or mitigated.

- **NPS has failed to resolve disagreements regarding No Adverse Effect determinations**. We appreciate that the NPS is now acknowledging that at least 42 historic properties will be adversely affected, including 6 National Historic Landmarks, 8 historic districts, 8 cultural landscapes, and 20 individually significant historic properties. However, consulting parties have expressed disagreement with some of the NPS's No Adverse Effect determinations, and those disagreements must be resolved before moving on to the next step of the consultation process by referring the disagreement to the Advisory Council on Historic Preservation, as required by 36 C.F.R. § 800.5(c)(2). For example, the DC SHPO has cited a disagreement with the No Adverse Effect determination for Theodore Roosevelt Island, and the National Trust continues to disagree with the NPS assumption that visual impact from the publicly accessible rooftop of a building is inherently not adverse.

- **NPS has failed to comply with Section 110(f) of the National Historic Preservation Act**. For the six adversely affected National Historic Landmarks, the NPS has failed to comply with the requirement to "undertake such planning and actions as may be necessary to minimize harm to the landmark" "to the maximum extent possible." 54 U.S.C. § 306107.

- **NPS has failed to comply with the National Environmental Policy Act (NEPA)**. The Finding of No Significant Impact (FONSI) was issued on June 18, 2026

(just three days after the first Section 106 consultation meeting), and was completely unsubstantiated. It also provides additional evidence that NPS is merely going through the motions of a review, and has already made its decision. At the September 9 meeting, NPS stated its intention to conduct an updated NEPA review, but that it would not allow any public comment! In light of the acknowledged adverse effects on 42 historic properties, and the receipt of more than 100,000 public comments in opposition to the project, the failure to prepare an Environmental Impact Statement and the failure to allow public comment during the NEPA review is indefensible.

- **NPS has failed to ensure compliance with Section 4(f) of the Department of Transportation Act**. As we have previously pointed out, the Federal Aviation Administration and Federal Highway Administration have review and approval roles for this project that require compliance with Section 4(f), which prohibits the "use" of historic sites and parks unless there is no feasible and prudent alternative, and the project includes "all possible planning to minimize harm." 49 U.S.C. § 303(c); 23 C.F.R. Part 774. Not only would the proposed Arch be built directly on federal historic park land, thus resulting in a "use," but the Arch would also result in a "constructive use" of Arlington National Cemetery, because "the project's proximity impacts [would be] so severe that the protected activities, features, or attributes that qualify the property for protection [would be] substantially impaired." 23 C.F.R. § 774.15(a).

Overall, the National Trust remains deeply concerned that NPS's approach to this undertaking is both legally inadequate and fundamentally disrespectful to Arlington National Cemetery and the dozens of other historic resources that would be adversely affected. There are numerous critical issues that have not been adequately addressed during this consultation, and the subject undertaking is blatantly illegal. The National Trust urges NPS to slow down the unreasonably accelerated pace of this Section 106 consultation to consider these critical issues and to allow for a more reasonable evaluation of the proposed undertaking's adverse effects.

Sincerely,

Elizabeth S. Merritt
Deputy General Counsel

Chris Cody
Senior Associate General Counsel

National Mall Coalition

September 16, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, D.C. 20242

Via email: tammy_stidham@nps.gov

Dear Ms. Stidham:

Thank you for holding the Section 106 consultation for the Triumphal Arch at Memorial Circle project on September 9th. The National Mall Coalition ("Coalition") provided comments on the Arch project on June 15, 2026, and additional comments on July 19th. We still await responses from NPS to our many questions and concerns raised in those two letters. Our comments today focus more specifically on the Section 106 meeting on September 9th.

We are in strong agreement with objections stated during that session and in subsequent communication by the DCSHPO, the DC Preservation League, and other consulting parties. The MOA proposed by NPS is not only grossly premature, it preempts any meaningful public consultation on the crucial questions of alternatives to the site and the design, which the NPS has stated they will not consider. What kind of Section 106 process is this? It fails miserably. As others have noted, NPS is derelict in its duties in continually asserting that NPS will not consider any alternative sites or design for the Arch. We call on NPS to answer the questions and concerns the Coalition, DCSHPO, C100, Cultural Landscape Foundation, and many others have raised with real answers, not dismissals. The 1924 Memorial Bridge Commission report that NPS cites as the plan for the Arch called, as DCHPO states, for two slender columns, not a massive triumphal arch. The purpose of those columns was to frame the view to Arlington, not to celebrate our nation's 250th anniversary. The 1924 report is absurd as a historical justification for the site, the architectural form, and the meaning of this massive, obstructive Arch project.

We reiterate:

- What are the alternatives NPS is considering, including South Capitol Street and maybe Barney Circle (as proposed some years ago)?

- What other designs or architectural forms have been considered besides a triumphal arch, historically associated with military victory, or different sizes and treatments of an arch form?
- How does NPS, as our nation's premier interpreters of America's historic sites, explain the meaning of placing a triumphal arch on the symbolic axis connecting the Lincoln Memorial to Arlington National Cemetery and Arlington House? I have heard and read nothing that explains how this symbolic triumphal form respects Washington's design symbolism, let alone how that form, on that location, celebrates 250 years of American democracy.

To that last point, on a personal note, as an art historian and lecturer on Washington architecture for over 30 years, as well as chair of a nonprofit committed to protecting the brilliant legacy of the 1791 L'Enfant Plan and 1902 McMillan Plan, I propose that locating a colossal Triumphal Arch at Memorial Circle will not only destroy key components of Washington's symbolism as an embodiment of our nation's history. It may raise serious outrage by ordinary Americans as well as historians for the political message it appears to convey: that the Confederacy, or its ideology that still has many proponents today, won the Civil War after all. The Arch severs the physical, symbolic, and visual connection between Lincoln and Arlington House that signifies reunification, reconciliation.

We urge NPS to go back to the drawing board with the Triumphal Arch project, open a Section 106 consultation process, and begin discussions about alternative sites, forms, and meaning. Let's start by asking how and where we can respectfully honor the 250th anniversary of American democracy.

Sincerely,

Judy Scott Feldman

Judy Scott Feldman, PhD
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Memorandum

To: Tammy Stidham, Associate Regional Director, National Park Service (NPS)

Date: September 21, 2026

From: Mical Durak, Historic Preservation Program (HPP), CPHD

Subject: HPP Feedback on Memorandum of Agreement (MOA) – September 2026

Thank you for reaching out to seek input on the Memorandum of Agreement (MOA). Please see below for Arlington County's Historic Preservation Program's (HPP) comments:

Feedback on the Memorandum of Agreement (MOA):

- Pages 1-2: The National Park Service (NPS) continues to reiterate that the purpose of the construction of the triumphal arch is to "celebrate 250 years of American independence by honoring America's founding principles through [the] installation of a structure at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway…" and that the undertaking is "location-dependent and is proposed for Memorial Circle because the proposed arch is ground in the historic planning and design intent for the Arlington Memorial Bridge, Memorial Avenue, Columbia Island, and Memorial Circle corridor…".
    - It remains unclear to HPP staff how this particular design for the triumphal arch being presented celebrates the 250th anniversary of America and how it meets the original design intent for the corridor.
    - The original 1924 Report of the Arlington Memorial Bridge Commission called for the construction of vertical monumental elements at Columbia Island, that measured 33.5 feet wide and 166 feet tall. In short, the original proposal called for something significantly smaller and more in proportion with the surrounding landscape, in comparison to NPS's current proposal. The construction of a commemorative feature of that original scale in this area would comply with the original plans. HPP staff believe that the scale and massing of the proposed 250-foot-tall triumphal arch fall outside of the original scope of that plan and do not comply with its intended spirit, undermining any reliance on the initial intentions.
    - Furthermore, it is unclear how the proposed arch would be a new destination for learning and contemplation by the public as previously described by NPS in the Assessment of Effects (pg. 11) and how the arch specifically connects to the 250th anniversary of America aside from the 250-ft. tall design.

  - Given these ongoing issues, HPP staff do not believe that NPS has sufficiently explored alternative locations or designs for the triumphal arch to avoid grave impacts on historic properties and to better connect to the stated "purpose" of the undertaking, which as drafted could support any number of projects in any number of locations. No bonafide consideration of alternative designs of locations has been demonstrated to consulting parties to justify that the proposed triumphal arch must be located within this specific area and must have this specific design to meet the purpose and need as presented by NPS. We continue to request that any study completed of a smaller arch design or alternative project designs be shared with consulting parties for their review.
- Page 3: NPS lists the number of identified historic resources within the Area of Potential Effects (APE) of this undertaking. HPP staff continue to maintain that NPS has not sufficiently identified all National Register of Historic Places (NRHP)-eligible historic resources, such as properties that have not been previously identified but meet the age requirements for eligibility in Arlington County and that a comprehensive architectural survey still needs to be completed to assess eligibility and effect on eligible resources. This request was shared with NPS both via our feedback on the Assessment of Effects (AoE) as well as during the consulting party meeting on September 9th, 2026, but remains unaddressed by NPS.
- Page 5: HPP staff request that NPS address the role and responsibilities of consulting party members in the "Roles and Responsibilities" section of the MOA.
- Page 6 – 13: HPP staff recognize the proposed mitigation measures outlined in the MOA. HPP staff would support the implementation of all these measures to mitigate the large impact of this undertaking on surrounding historic and cultural resources.
  - Page 6: Construction management control is essential, especially given the impact the construction of this proposed undertaking would have on the daily operations of the Arlington National Cemetery (ANC). HPP staff have concerns about the potential noise impact of this project on the cemetery during solemn events. Furthermore, NPS notes that they would coordinate with ANC to "avoid disruptive construction activities during funerals". ANC has 24 to 27 funerals a day and had over 5,200 funerals in fiscal year 2025 alone. HPP staff strongly urge NPS staff to consider how this project will impact these operations to honor and remember those who have served and how it is a virtual certainty this project's construction activities will impact active funerals at ANC given their frequency.
  - Page 7: Under "Archaeological Investigation," HPP staff seek clarification on the archaeological monitoring proposed. NPS notes that archaeological monitoring would occur during "excavation, foundation work, and utility installation", but notes that monitoring would occur during "deep excavation" in the same section. Given the potential for archaeological resources, as noted by NPS, monitoring during any excavation would be warranted – not just during "deep excavation."
  - Page 7: HPP staff also seek clarification on what NPS is referring to when citing the "public archaeology component".
  - Page 10: Under "Documentation," NPS offers oral histories as a mitigation measure; however, it notes that "transcripts and recordings would be archived and, where appropriate, made available for interpretation, research, and public education". Could NPS explain what transcripts would be made available? Who

will make the determination on sufficient or significant worthiness of retention? How would this be a true mitigation measure if this information was not available to the larger public for research and study?

  - HPP staff want to reiterate that the terms of mitigation should apply to all adversely effected properties such as, but not exclusive to, Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, ANC, Arlington House, and the Lincoln Memorial corridor. Furthermore, for the mitigation efforts proposed that would not have placement on or near the site, the final products should be accessible to the public either through a repository such as the Library of Congress or a website. HPP staff would like to be notified where those items are located in the future so we can request access to them.
  - Outside of what was proposed in the MOA for mitigation, NPS should also consider further measures to support American troops and veterans utilizing these areas (both the ANC and the Military Women's Memorial) given the impact this proposed project would have on that landscape and those spaces. NPS should also consider the use of easements or placement of other limitations on future redevelopment for these historic areas and cultural landscapes.

- Pages 13 – 15: HPP staff request that consulting parties, not just Signatories, are issued a "summary report detailing work undertaken pursuant to its terms, or a statement of 'no activity'" as outlined in the Monitoring and Reporting section of the MOA on pgs. 13 – 14. Furthermore, we request that consulting parties, not just Signatories, are also informed of any "post-review discoveries" as outlined on pgs. 14 – 15. Given the scale and noted impact of this proposed undertaking on historic resources, we feel it is appropriate and essential to continue to inform and involve consulting parties identified as part of the current Section 106 process in any future discussions and changes to the proposed undertaking.
- NPS notes in several sections (Post-Review Discoveries, Dispute Resolution, Non-Compliance, Termination, and Withdrawal) that "nothing in this section shall be interpreted to require NPS to cease construction activities during the pendency of compliance with 36 C.F.R. § 800.13." HPP staff request that this statement be omitted from the MOA as we believe that under these specific circumstances, a halt in construction activities is not only appropriate but essential. For example, NPS explains in the Non-Compliance, Termination, and Withdrawal section what would occur if the MOA was terminated. HPP staff believe that all construction activities and work on the project should cease in the event there is no active MOA for the proposed undertaking to ensure that mitigation efforts related to the project are still guaranteed to be undertaken.

Although HPP staff can appreciate NPS's interest in developing a MOA for this project, we believe that reaching this step and requesting signatures to the MOA is premature. NPS has not adequately addressed several of HPP staff's concerns and comments, and those of other consulting parties, from previous review cycles of Section 106 documents and meetings. We continue to maintain that NPS has not sufficiently considered avoidance or alternative options for this project, that it remains unclear what the ultimate purpose of the triumphal arch would be and how it would benefit the American public, and that NPS has not fully and appropriately analyzed the impact this project would have on all historic resources within the APE. Without providing this critical information and without bonafide consideration of avoidance or alternative

options for the proposed undertaking, this process fails to comply with the requirements of the Section 106 process. HPP staff do not believe this project has reached the point of development where discussions about mitigation are appropriate; this should come after all other concerns, and an exploration of alternative options, are fully discussed and documented.

Finally, HPP staff continue to maintain that the requested review period by NPS of consulting parties does not follow standard protocols. Requesting that consulting parties review and sign an MOA within less than a week is inappropriate and unreasonable. Furthermore, this review request was made by NPS before the stated deadline of September 16, 2026, for all consulting party comments on the AoE indicating that NPS was not taking those comments into consideration as part of their development of the MOA. As with the past four engagements with consulting parties, it does not follow the standard Section 106 process.

Given HPP staff's ongoing, articulated concerns regarding this undertaking, and because several substantive comments from Arlington County and other consulting parties remain unresolved, Arlington County does not concur with the proposed MOA and will not be a signatory at this time. NPS has not adequately addressed concerns raised during previous reviews of the Section 106 documentation and consultation process.

We welcome future opportunities to meaningfully engage in the Section 106 process for this undertaking in the future, and welcome reviewing the MOA again once our outstanding concerns, and those of other consulting parties, have been satisfactorily addressed by NPS.

Mical Durak
Historic Preservation Principal Planner

MEMORANDUM OF AGREEMENT

AMONG
THE NATIONAL PARK SERVICE,
THE NATIONAL CAPITAL PLANNING COMMISSION,
DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,
VIRGINIA STATE HISTORIC PRESERVATION OFFICE, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE TRIUMPHAL ARCH PROJECT

This Memorandum of Agreement ("MOA") is made as of this ___day of ____, 2026, by and among the National Park Service (NPS), the Virginia State Historic Preservation Office (VA SHPO), the District of Columbia Historic Preservation Office (DC HPO), the National Capital Planning Commission (NCPC), and the Advisory Council on Historic Preservation (ACHP) (referred to collectively herein as the "Parties" or "Signatories" or individually as a "Party" or "Signatory"), pursuant to Section 106 of the National Historic Preservation Act ("NHPA"), 54 U.S.C. § 306108, and its implementing regulations 36 CFR Part 800 ("Section 106") regarding the Triumphal Arch Project (Undertaking); and

WHEREAS, the George Washington Memorial Parkway (hereinafter "GW Parkway") was established pursuant to what is known as the Capper-Cramton Act, Public Law 71-284, 46 Stat. 482, (May 29, 1930), became a unit of the national park system pursuant to Executive Order 6166 of June 10, 1933 (taking effect August 10, 1933), and is administered by the National Park Service (hereinafter "NPS"); and

WHEREAS, the NPS is charged in the NPS Organic Act as codified in Title 54 United States Code (USC) § 100101(a) to "conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations"; and

WHEREAS, the GW Parkway is a nationally significant historic property in Virginia, Maryland, and the District of Columbia listed in the National Register of Historic Places (hereinafter "NRHP") on June 2, 1995, as a historic district for its commemorative, design, and scenic qualities, and the 25-mile-long parkway segment along the Potomac River's west shore and 6.8 mile long segment along the Potomac River's east shore and their settings are important landscape features that contribute to the significance of the GW Parkway; and

WHEREAS, Memorial Circle, which connects Arlington Memorial Bridge and Memorial Avenue, is located within the GW Parkway and is part of the nationally significant historic property Arlington Memorial Bridge and Related Features in Virginia and the District of Columbia and listed in the NRHP on April 4, 1980, as a historic property for its architectural and engineering design qualities; and

WHEREAS, the NPS proposes to construct the Triumphal Arch ("the Undertaking") within Memorial Circle to celebrate 250 years of American independence by honoring America's

founding principles through installation of a structure at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage.

WHEREAS, the Undertaking is subject to review under Section 106 of the NHPA as amended (54 U.S.C. § 306108) and NPS will be the federal agency responsible for compliance; and

WHEREAS, the Undertaking is location-dependent and is proposed for Memorial Circle because the proposed arch is grounded in the historic planning and design intent for the Arlington Memorial Bridge, Memorial Avenue, Columbia Island, and Memorial Circle corridor; and

WHEREAS, the 1924 Report of the Arlington Memorial Bridge Commission contemplated monumental vertical elements at Columbia Island/Memorial Circle to mark and give architectural emphasis to the western terminus of Arlington Memorial Bridge and the ceremonial transition from the bridge to Memorial Avenue and the entrance sequence to Arlington National Cemetery; and

WHEREAS, the NPS has determined that alternative locations outside Memorial Circle would not fulfill the undertaking's purpose in the same manner because they would sever the proposed commemorative feature from the specific historic planning precedent and designed axial relationship that provide the rationale for its placement; and

WHEREAS, the NPS has further determined that the proposed location at Memorial Circle is central to the undertaking, and that relocation outside Memorial Circle would constitute a materially different undertaking rather than an avoidance alternative for the proposed Triumphal Arch; and

WHEREAS, the NPS recognizes that Memorial Circle is located within a highly sensitive historic and commemorative landscape and that the Undertaking's location contributes to adverse effects to historic properties whose significance is associated with setting, design, feeling, association, spatial organization, circulation, and contributing views and vistas; and

WHEREAS, because such adverse effects cannot be fully avoided while retaining the location-dependent purpose of the Undertaking, NPS has consulted to identify measures to minimize and mitigate adverse effects to historic properties; and

WHEREAS, in accordance with 36 C.F.R. § 800.3, NPS initiated Section 106 consultation with DC HPO, VA SHPO, and Consulting Parties on June 5, 2026; and

WHEREAS, the NCPC is a Consulting Party in the Section 106 process pursuant to 36 CFR § 800.3(f)(1), has approval authority over Federal land located within the District of Columbia and has approval authority over physical alterations to Federal property pursuant to the National Capital Planning Act (40 U.S.C. § 8722(b)(1) and (d)), the NCPC has elected to fulfill its Section 106 responsibilities by participating in this consultation and is a Signatory to this MOA pursuant to 36 CFR § 800.6(c)(2); and

WHEREAS, the NPS and NCPC have agreed that NPS will be the lead Federal agency pursuant to 36 C.F.R. § 800.2(a)(2) for the Undertaking to fulfill their collective Section 106 responsibilities; and

WHEREAS, the U.S. Commission of Fine Arts (CFA) has a design review authority over new structures erected in the District under the direction of the Federal government (45 C.F.R. §§ 2101 (a)(1), 2101(f) (2011)) and over all important plans for parks and all public buildings for which "in any essential way affect the appearance of the City of Washington, or the District of Columbia" (45 C.F.R. §§ 2101(a)(2), 2101(d) (2011)). The CFA is a Consulting Party in the Section 106 process pursuant to 36 CFR § 800.3(f)(1) and is invited to concur with this MOA pursuant to 36 CFR § 800.6(c)(3); and

WHEREAS, in letters dated June 5, 2026, the NPS informed the Federally recognized sovereign Indian Nations that have a government-to-government relationship with the United States and an interest in the area affected by the Undertaking, pursuant to 36 C.F.R. § 800.2(c)(2), about the project and invited them to be Consulting Parties. The Federally recognized sovereign Indian Nations include the Absentee Shawnee Tribe of Indians of Oklahoma Nation, Catawba Indian Nation, Chickahominy Indian Tribe, Chickahominy Tribe Eastern Division, Monacan Indian Nation, Nansemond Indian Nation, Pamunkey Indian Tribe, Rappahannock Tribe, Shawnee Tribe, and Upper Mattaponi Indian Tribe (collectively referred to as "Native American Tribes" in this MOA). The NPS invited each of these Native American Tribes to concur with this MOA pursuant to 36 C.F.R. § 800.6(c)(3). All the letters sent to Native American Tribes can be found in **Appendix A**; and

WHEREAS, the Native American Tribes that did not respond to the invitation continue to be included in the Section 106 process through invitations to Consulting Parties meetings and will continue to be invited to any subsequent Consulting Parties meetings; and

WHEREAS, in accordance with 36 C.F.R. § 800.2(a)(4), the NPS invited certain individuals and organizations with a demonstrated interest in the Undertaking to participate as Consulting Parties in the Section 106 process via meeting virtually held on June 15, 2026. The full list of Consulting Parties invited is provided in Appendix B, along with presentation materials from the Consulting Party meetings; and

WHEREAS, the NPS, in consultation with DC HPO, VA SHPO, NCPC, and the Consulting Parties, established the Area of Potential Effects (APE), as defined under 36 C.F.R. § 800.16(d). The APE is included in Exhibit C; and

WHEREAS, the NPS identified 261 historic resources within the APE (that also encompass numerous contributing features), including the 31 National Historic Landmarks, 53 Historic Districts, 10 Cultural Landscapes, 167 individually / other historic properties; and

WHEREAS, pursuant to 36 CFR § 800.5(a) the NPS, in consultation with the DC HPO, VA SHPO, NCPC, and the Consulting Parties, has applied the criteria of 36 CFR § 800.5(a)(1) to the Undertaking, and provided all relevant findings in the Triumphal Arch Assessment of Effects

Report (Appendix C); and

WHEREAS, specific design details are not developed at the concept planning level, therefore, the Triumphal Arch Assessment of Effects includes determinations from portions of the proposed Undertaking. These effects will be further assessed as part of future Section 106 reviews of individual project components, as required under the terms of this MOA; and

WHEREAS, the NPS conducted two (2) Section 106 Consulting Party meetings to provide opportunities for the Consulting Parties to comment on the Undertaking, the delineation of the APE, the identification of historic properties, the assessment of effects on historic properties, and potential resolution strategies; and

WHEREAS, the Undertaking is subject to review under National Environmental Policy Act (NEPA) (42 U.S.C. § 4231 et seq), and in accordance with NEPA, the NPS has prepared an Environmental Assessment (EA); and

WHEREAS, the NPS completed an EA, published June 5, 2026, as part of NPS's NEPA compliance and issued the Finding of No Significant Impact; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the NPS notified the Advisory Council on Historic Preservation (ACHP) of its findings of effects meeting the criteria in 36 CFR § 800.5(a)(1) with specified documentation on June 5, 2026, and on June 15, 2026, the ACHP chose to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, NPS, DC HPO, VA SHPO, and NCPC agree that, if the Undertaking is implemented in accordance with the following stipulations taking into account the adverse effects on historic properties, these stipulations will govern compliance with Section 106 of the NHPA.

STIPULATIONS
The NPS will ensure that the following measures are carried out:

I. GENERAL

A. APPLICABILITY

1. The NPS will use the terms and conditions of this MOA to fulfill its Section 106 responsibilities and those of other Federal agencies who designate NPS as the lead Federal agency pursuant to 36 C.F.R. § 800.2(a)(2). Federal agencies that do not designate NPS as the lead Federal agency remain individually responsible for their compliance with Section 106.

2. In the event a Federal agency or other agency issues federal funding or approvals for the Undertaking, such funding or approving agency may comply with Section 106 by agreeing in writing to the terms of this MOA and notifying and consulting with the Signatories. Any necessary amendments will be considered in accordance with

Stipulation X of this MOA.

B. TIME AND NOTIFICATIONS

1. All time designations are in calendar days unless otherwise stipulated. If a review period ends on a Saturday, Sunday, or a Federal holiday, the review period will be extended until the first following business day.
2. All communication and notifications required by this MOA will be sent by email or other electronic means.

C. ROLES AND RESPONSIBILITIES

1. NPS
   a. Pursuant to 36 C.F.R. § 800.2(a)(2), NPS has the responsibility to ensure the provisions of this MOA are carried out.
   b. NPS is responsible for all government-to-government consultation with Federally recognized Native American tribes.
   c. NPS is responsible for coordinating Federal agencies' compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) within its jurisdictional areas.
   d. NPS is responsible for enforcing the applicable provisions of the Archaeological Resources Protection Act (ARPA) (16 U.S.C. § 470aa et seq.), including but not limited to the issuance of permits, permit oversight, and investigation of any damages resulting from prohibited activities.

2. DC HPO and VA SHPO
   a. DC HPO and VA SHPO will review Project submittals according to the timeframes defined within this MOA, and participate in consultation, as requested by NPS.

3. NCPC
   a. NCPC will review Project submittals according to the timeframes defined within this MOA, and participate in consultation, as requested by NPS.
   b. These reviews do not supersede the statutory or regulatory obligations of this body, and NCPC will review and approve the project components as required.

4. CFA
   a. CFA will review Project submittals according to the timeframes defined within this MOA, and participate in consultation, as requested by NPS.
   b. These reviews do not supersede the statutory or regulatory obligations of this body, and CFA will review and approve the project components as required.

II. PROFESSIONAL QUALIFICATIONS STANDARDS

The NPS will ensure that all historic preservation work performed by the relevant agency pursuant to this Agreement will be accomplished by or under the direct supervision of a

person or persons who meet(s) or exceed(s) the pertinent qualifications in The *Secretary of the Interior's Historic Preservation Qualification Standards* (62 CFR § 33708) as amended on June 20, 1997.

III. RESOLUTION OF POTENTIAL ADVERSE EFFECTS

A. Construction Management Control

1. **Develop and implement a vibration monitoring plan** - Install vibration monitors near Arlington Memorial Bridge and other historic structures, bridge approaches, historic stonework, pylons, retaining walls, and other sensitive resources. Establish thresholds requiring work modification or stoppage if vibration exceeds approved limits.

2. **Screening of Construction Areas -** Use neutral, visually recessive screening to reduce temporary visual effects from construction fencing, equipment, trailers, stockpiles, and staging areas.

3. **Control Temporary Lighting -** Limit construction lighting to the minimum necessary, direct it downward, shield it, and prohibit unnecessary nighttime lighting that would affect historic views or cemetery solemnity.

4. **Construction Noise Control Plan -** Establish enforceable limits, monitoring, notification, and work restrictions for noise-generating activities. Would include the use of sound barriers or acoustic blankets, locating generators where noise is reduced, coordinate with Arlington National Cemetery, and limits on nighttime work.

5. **Ceremonial Route Protection Plan -** Coordinate with Arlington National Cemetery to avoid disruptive construction activities during funerals, wreath ceremonies, major commemorative events, and ceremonial movements.

6. **Work-hour limitations -** Restrict work hours for high-noise, high-vibration, or highly visible construction activities to minimize effects on visitor experience and ceremonial use of historic properties.

7. **Pedestrian and visitor access protection -** Maintain safe, legible pedestrian routes to Arlington Memorial Bridge, Memorial Avenue, LBJ Park, Arlington National Cemetery, and nearby memorials during construction.

8. **Construction Management Plan -** Require a Construction Management Plan to minimize construction-period effects to historic properties, adjacent resources, traffic circulation, visitor access, and the surrounding commemorative landscape. The plan would address traffic control, sediment and erosion controls, laydown-area limits and restoration, off-site fabrication to reduce on-site activity, limited worker parking with use of Metro or remote parking, enclosed workforce break areas, self-contained restroom facilities, vibration and movement monitoring for adjacent structures, coordination of

pile-driving and other disruptive activities around planned events, use of a fixed tower crane to reduce street impacts, and off-site fabrication of arch cladding to minimize truck trips, equipment, labor, and laydown needs at the project site.

9. **Construction Dust Control Plan -** Fugitive emission sources include the transfer of sand and aggregate, truck loading, mixer loading, vehicle traffic, and wind erosion from sand and aggregate stockpiles. The amount of fugitive emissions generated during the transfer of sand and aggregate depends primarily on the surface moisture content of these materials. Wetting materials prior to moving or if dust is being generated reduces air emissions that then become sediment that falls into surrounding waterways.
10. **Maintain Construction Site and Staging Area BMPs for Wildlife/IPM -** All trash receptacles must be lidded and emptied regularly to avoid attracting wildlife. Trailer crawl spaces should be screened to avoid wildlife utilizing them. Doors should be fitted, remain closed when not in use, and maintain sweeps to avoid rodent infiltration.

B. Archeological Investigation

Implement Archaeological Identification, Protection, Monitoring, and Treatment Measures – Complete additional archaeological identification, evaluation, monitoring, and treatment prior to and during ground disturbance. Measures would include review of final design and utility routes for archaeological sensitivity; preparation of an Archaeological Work Plan; completion of Phase IB, geoarchaeological, or other investigations where warranted; avoidance of significant archaeological resources where feasible; preparation of an Archaeological Treatment Plan or Data Recovery Plan if avoidance is not feasible; archaeological monitoring during excavation, foundation work, and utility installation; stop-work and notification procedures for unanticipated discoveries; specific protocols for human remains and culturally sensitive materials; contractor cultural-resource training; and final reporting, analysis, and curation of recovered materials and records. This could include the following:

- Phase IB archaeological testing before initiation of construction
- Geoarchaeological study of buried landforms
- Utility corridor archaeology investigations
- Archaeological monitoring during deep excavation
- Archaeological Treatment Plan / Data Recovery Plan
- Public archaeology component

C. Park Improvements

1. **Rehabilitate Memorial Avenue historic landscape -** Rehabilitate contributing landscape features along Memorial Avenue to reinforce its historic role as the ceremonial approach between Arlington Memorial Bridge and Arlington National Cemetery.

Improvements could include restoration of turf panels, medians, walkways, curbs, planting patterns, tree canopy, lighting, and other character-defining landscape features that contribute to the formal procession from the bridge to the cemetery. Work would be designed to preserve the corridor's axial organization, solemn character, and commemorative function while improving landscape condition, pedestrian safety, and long-term maintainability.

2. **Restore or enhance Arlington Memorial Bridge approach landscapes** – Restore or enhance the designed landscapes at the approaches to Arlington Memorial Bridge to improve the integrity of associated historic landscape features and strengthen the visual and ceremonial relationship between the Lincoln Memorial, the Arlington Memorial Bridge, Memorial Circle, and Memorial Avenue. Improvements could include repair or replacement in kind of damaged paving, curbs, walls, planting areas, lawn panels, and other contributing features; removal or consolidation of non-historic visual clutter; and rehabilitation of landscape areas disturbed by construction, staging, utilities, or circulation changes. These measures would be implemented using materials, planting treatments, and design details compatible with the historic bridge setting.

3. **Improve visitor wayfinding and pedestrian orientation** - Improve visitor wayfinding between Memorial Avenue, Arlington National Cemetery, Arlington House, nearby transit facilities, and associated pedestrian routes to reduce confusion, improve safety, and minimize conflicts among visitors, vehicles, funeral processions, and daily cemetery operations. Wayfinding improvements could include coordinated directional signage, pavement markings, accessible route information, maps, digital tools, and discreet interpretive orientation at key decision points. All wayfinding elements would be designed to be visually compatible with the historic setting, avoid unnecessary sign clutter, and support movement through the corridor without diminishing the solemn and ceremonial character of Memorial Avenue and Arlington National Cemetery.

D. Documentation

1. **Prepare Historic American Landscapes Survey (HALS)documentation for Memorial Circle and the Memorial Avenue corridor -** Prepare HALS documentation for Memorial Circle, Memorial Avenue, and associated designed landscape features to create a permanent record of the corridor prior to project implementation. The documentation would address the corridor's historic development, spatial organization, circulation patterns, planting structure, lawn panels, views and vistas, small-scale features, and relationship to Arlington Memorial Bridge, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, and the Lincoln Memorial. Documentation would include large-format photography, written historical narrative, existing-condition plans, and other materials meeting applicable HALS standards.

2. **Prepare Historic American Building Survey (HABS)/HALS documentation for affected designed landscapes and views -** Prepare appropriate HABS and/or HALS documentation for affected historic properties, designed landscapes, and significant views that may experience adverse visual, spatial, or setting-related effects. This documentation would record character-defining features, designed views, circulation relationships, landscape composition, and the physical and visual connections among the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, Arlington House, and adjacent parklands. The documentation would supplement existing National Register or National Historic Landmark documentation where current records do not fully describe viewsheds, spatial relationships, or cultural landscape significance.

3. **Complete historic viewshed documentation -** Prepare a systematic photographic and narrative record of existing views and vistas within the cross-Potomac commemorative corridor. The documentation would include key viewpoints from the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, Fort Myer, and other locations identified through consultation. Photography would be completed in leaf-on and leaf-off conditions, during daytime and nighttime conditions, and, where feasible, during ceremonial or high-use conditions to document how the corridor is experienced in different seasonal, lighting, and operational contexts. The final record would identify the viewpoint, date, time, lens information, field of view, direction, and historic significance of each view.

4. **Develop a 3D digital model and LiDAR record of the corridor -** Prepare a three-dimensional digital documentation package, which may include LiDAR scanning, photogrammetry, GIS-based viewshed modeling, or other digital survey methods, to create a permanent record of pre-project spatial relationships and existing conditions. The model would document the relationship among Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, and the Lincoln Memorial, including topography, circulation, landscape features, and key sightlines. The digital record could be used for archival purposes, future preservation planning, public interpretation, and comparison with post-construction conditions.

5. **Prepare archival-quality drone and ground photography -** Complete archival-quality aerial and ground-based photography to document existing views, landscape organization, circulation patterns, and cultural landscape relationships before construction. Drone photography would be used where permitted and appropriate to capture the spatial relationship of the corridor from above, including the alignment

from the Lincoln Memorial across Arlington Memorial Bridge to Memorial Circle, Memorial Avenue, Arlington National Cemetery, and Arlington House. Ground photography would document the visitor-level experience from key public viewpoints and ceremonial routes. All photography would be catalogued and retained as part of the project's permanent mitigation record.

6. **Conduct oral histories related to the commemorative corridor -** Develop an oral history program to document the meaning, use, and public significance of the Lincoln Memorial–Arlington House commemorative corridor. Interviewees could include historians, veterans, preservation professionals, Arlington National Cemetery families, representatives of veterans' organizations, NPS staff, Arlington National Cemetery staff, landscape architects, design experts, and others with knowledge of the corridor's history, symbolism, and contemporary use. Oral histories would address the meaning of the visual axis, the ceremonial role of Memorial Avenue and Arlington Memorial Bridge, the experience of visiting Arlington National Cemetery and Arlington House, and the evolution of the corridor as a commemorative landscape. Transcripts and recordings would be archived and, where appropriate, made available for interpretation, research, or public education.

7. **Develop a history of the creation of Lady Bird Johnson Park -** Prepare a focused historical study documenting the creation, design, naming, development, and evolution of Lady Bird Johnson Park within the broader Columbia Island and Memorial Circle landscape. The study would address the park's relationship to Arlington Memorial Bridge, the George Washington Memorial Parkway, Memorial Circle, the Potomac River, and the commemorative landscape connecting Washington, D.C. and Arlington. The history would also examine the park's landscape design, plantings, circulation, commemorative associations, environmental setting, and role as a visual and physical frame for Memorial Circle. The final product could support future management, interpretation, National Register documentation, and cultural landscape treatment recommendations.

8. **Create a meadow management program and plan for Lady Bird Johnson Park** - Where appropriate (based on use), consider transitioning lawns throughout Lady Bird Johnson Park (Columbia Island) to meadows with native grasses. In addition to making Lady Bird Johnson Park compatible with the proposed conditions on Memorial Avenue, conversion to native grasses (rather than turf) would also reduce the need to mow, increase biodiversity, and provide habitat for pollinators. Collaborate with natural resource management to determine appropriate grasses and seed selection.

E. Interpretation

1. **Develop an interpretive program on the Lincoln Memorial–Arlington House axis -** Develop an interpretive program explaining the historic, symbolic, and commemorative relationship among the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House. The program would address the corridor's design intent, its association with national unity and reconciliation, its role as a ceremonial connection between Washington, D.C. and Arlington, and the ways in which the landscape has evolved over time. Interpretation could be delivered through ranger-led programs, digital media, waysides, printed materials, and educational content.

2. **Develop a digital interactive or wayside viewshed exhibit-** Create an interactive digital exhibit, wayside exhibit, or combination of both that allows visitors to compare historic, existing, and post-project views within the commemorative corridor. The exhibit would help visitors understand how views across the Potomac River have changed over time and how the monumental core evolved through successive periods of planning, design, commemoration, transportation development, landscape change, and federal stewardship. The exhibit could include historic maps, plans, photographs, visual simulations, annotated viewsheds, and layered "then-and-now" comparisons.

3. **Install interpretive waysides at Memorial Circle and Memorial Avenue -** Install a limited number of compatible interpretive waysides at Memorial Circle and along Memorial Avenue to explain the design history and significance of Memorial Circle, Columbia Island, Arlington Memorial Bridge, Memorial Avenue, and the McMillan-era commemorative landscape. The waysides would describe the corridor's role as a formal ceremonial approach, its relationship to Arlington National Cemetery and Arlington House, and its connection to the Lincoln Memorial and National Mall. The signs would be designed to be visually compatible with the historic setting and located to avoid sign clutter or interference with character-defining views.

4. **Develop an NPS webpage on the development and significance of the cross-Potomac commemorative corridor -** Develop a publicly accessible webpage describing the development of Lady Bird Johnson Park, the Lincoln Memorial, Arlington National Cemetery, Arlington House, Arlington Memorial Bridge, Memorial Avenue, and the scenic and symbolic connections among these resources. The webpage would provide historical context for the corridor, explain its commemorative and landscape significance, and present historic plans, photographs, maps, and interpretive narratives showing how the corridor has changed over time. The webpage could also serve as a central repository for related interpretive materials, historic documentation, and links to digital exhibits.

5. **Develop a webpage on the history and significance of triumphal arches -** Develop an interpretive webpage explaining the history, symbolism, and evolution of triumphal

arches as monumental forms. The webpage would address the origins and use of triumphal arches in different historical and cultural contexts, their association with military victory, civic identity, national celebration, and public memory, and how the proposed Arch relates to or differs from those traditions. The webpage could also discuss how monumental forms are evaluated within historic landscapes and how new memorials become part of an evolving public landscape.

6. **Display archaeological materials recovered from project-related investigations where appropriate -** Develop a curated display of archaeological materials recovered from the Arch project and other related improvement projects, where appropriate and consistent with applicable laws, curation standards, and consultation outcomes. The display could be located within a climate-controlled public or interpretive space in the base of the Arch and would present recovered materials in a manner that explains their historical context, research value, and relationship to the development of Columbia Island, Lady Bird Johnson Park, Memorial Circle, and the Potomac River landscape. Sensitive materials, including human remains, funerary objects, sacred objects, or culturally sensitive items, would not be displayed unless expressly appropriate and consistent with applicable consultation and legal requirements.

7. **Develop an exhibit on archaeological investigations, made land, and landfilling -** Develop an exhibit explaining the archaeological investigation process, the importance of made land surfaces, and the engineering history of landfilling in the development of Lady Bird Johnson Park and Washington, D.C. The exhibit would describe how archaeologists identify buried landforms, former shorelines, fill episodes, historic deposits, and other subsurface evidence of landscape change. It would also explain the broader role of land reclamation, dredging, filling, and shoreline modification in the growth of the capital city and the creation of parkland along the Potomac River.

8. **Install QR-code interpretation on maritime activity along the Potomac River –** Develop discreet signage with a QR code linking to information about maritime activity along the Potomac River, particularly in relation to Washington, D.C., Arlington, Columbia Island, and the development of the river corridor. The digital content could address navigation, commerce, military activity, ferry crossings, bridges, shoreline change, dredging, landfilling, stormwater management and related water quality, and the transformation of the Potomac from a working river landscape into a monumental, recreational, and ceremonial setting.

9. **Install interpretation on Native peoples and the Potomac River -** Develop interpretive signage, digital content, or both, addressing Native peoples with ancestral connections to the Potomac River and surrounding landscape. The interpretation would explain the importance of the river for travel, trade, subsistence, settlement, and cultural life before

and during early colonial contact. This content would be developed in consultation with affiliated Tribes to ensure that the interpretation is accurate, respectful, and appropriate, and that it reflects Tribal perspectives where Tribes wish to provide them.

10. **Install signage and QR-code interpretation on affected scenic viewsheds and vistas -** Develop a coordinated set of interpretive signs and QR-code-linked digital materials explaining the scenic viewsheds and vistas affected by the proposed project. The interpretation would identify key views, explain their original design intent and historic significance, and describe how the Arch fits within the continued evolution of Washington, D.C.'s memorial landscape and public commemoration. The signs would be limited in number, carefully sited, and designed to avoid adding visual clutter to sensitive historic views.

11. **Lincoln Memorial viewshed:** Interpretation would explain the view from the Lincoln Memorial toward Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House, including the symbolic association of this cross-Potomac axis with national unity, reconciliation, and remembrance.

12. **Arlington National Cemetery viewshed:** Interpretation would describe views from cemetery approaches, Memorial Avenue, Arlington House, and other appropriate vantage points toward the Lincoln Memorial and the monumental core, emphasizing the ceremonial and commemorative role of the corridor.

13. **Lady Bird Johnson Park:** Interpretation would explain the creation, design, naming, and evolution of Lady Bird Johnson Park, including its relationship to Columbia Island, Memorial Circle, Arlington Memorial Bridge, the George Washington Memorial Parkway, and the Potomac River landscape.

14. **Mount Vernon Trail / regional trail connections:** Interpretation would explain relevant trail connections, pedestrian routes, and recreational corridors within the broader commemorative landscape, including their relationship to the Potomac River, park development, and public access.

15. **Digital map stories and QR-code content:** QR codes could link to map-based stories showing the development of each location over time, including historic plans, photographs, aerial imagery, design drawings, National Register documentation, and changes in views, circulation, landform, vegetation, and commemorative use.

IV. MONITORING AND REPORTING

Each year, until the MOA expires or is terminated, the NPS shall provide the Signatories with a

summary report detailing work undertaken pursuant to its terms, or a statement of "no activity". The report will be issued annually on or before July 31st. The report will summarize the efforts carried out during the prior year, updates on current Section 106 consultation processes, and any projects planned for the coming year. The NPS shall convene a meeting to discuss the information contained in the annual report as required, or when requested by a Signatory.

V. POST-REVIEW DISCOVERIES

A. If newly identified historic properties, sites and/or features are discovered during construction or unanticipated effects on known historic properties are identified, the NPS will comply with 36 C.F.R. § 800.13. The NPS will consult with DC HPO, VA SHPO, and, if applicable, Native American Tribes that may attach religious and/or cultural significance to the affected property, and will develop and implement avoidance, minimization, or mitigation measures with the concurrence of DC HPO, VA SHPO, and if applicable, Native American Tribes.

1. The NPS will inform the Signatories of the discovery within forty-eight (48) hours and, together with the Signatories, will determine the projected path forward to comply with Section 106 within fourteen (14) calendar days.
2. The Signatories will review the plan documents and provide written comments to the NPS within seven (7) calendar days.
3. The NPS will consider the written comments to the fullest reasonable extent. Should the NPS object to any comments made by the Signatories, NPS will provide a written explanation of their objection and will consult with the Signatories to resolve the objection. If no agreement is reached following receipt of a written explanation, the NPS will request the Advisory Council on Historic Preservation (ACHP) to review the dispute in accordance with Stipulation VIII.
4. If no Signatory provides written comments within the agreed upon time, NPS will assume they have no comments regarding the discovery and may then proceed with the submitted plan.

Nothing in this section shall be interpreted to require NPS to cease construction activities during the pendency of compliance with 36 C.F.R. § 800.13.

B. *Treatment of Human Remains*. In the event that human remains, burials, or funerary objects are discovered during implementation of the Undertaking or any action taken pursuant to this MOA, NPS will immediately notify DC HPO and the District Chief Medical Examiner or the VA SHPO and the Virginia Office of the Chief Examiner, as appropriate (in either case, the "CME").

1. If the CME determines that the human remains are not subject to a criminal investigation by Federal or local authorities, NPS will comply with the applicable Federal or local laws and regulations governing the discovery and disposition of human remains, and will consider the ACHP's Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects (2007).
2. For actions involving Native American human remains or burials, the appropriate

Native American Tribes, the VA SHPO, and the DC HPO will be consulted to determine a treatment plan for the avoidance, recovery, or reburial of the remains.

3. The NPS will ensure compliance with applicable laws in accordance with provisions of NAGPRA, as amended (Public Law 101-601, 25 USC § 3001 *et seq.*) and regulations of the Secretary of the Interior at 43 CFR § 10.

VI. CONFIDENTIALITY

A. If disclosure of locational information could result in the disturbance of a cultural resource, all Signatories to this MOA will ensure shared data, including data concerning the precise location and nature of historic properties, archeological sites, and properties of religious and cultural significance, are protected from public disclosure to the greatest extent permitted by law, in accordance with 36 C.F.R. § 800.11(c), Section 304 of the NHPA, Section 9 of the Archeological Resource Protection Act (ARPA) of 1979, and Executive Order on Sacred Sites 13007 CFR § 61-104 dated May 24, 1996.

B. All parties will follow NPS standard policies, Director's Orders #28 and 28A and the NPS management policies. In accordance with ARPA, the Superintendent of each park is the arbiter for what information can and cannot be released publicly.

C. Consulting Parties and members of the public are not entitled to receive information protected from public disclosure.

VII. DURATION

This MOA will expire if its terms are not carried out within ten (10) years from the date of its execution. Twelve (12) months prior to expiration, the NPS may consult with the Signatories to reconsider the terms of this MOA and amend it in accordance with Stipulation X below.

VIII. DISPUTE RESOLUTION

A. Should any Signatory or Consulting Party to this MOA object at any time to any actions proposed or the manner in which the terms of the MOA are implemented, NPS will consult with such Signatory to resolve the objection. If NPS determines such objection cannot be resolved within a reasonable time period, NPS will:

1. Forward all documentation relevant to the dispute, including NPS's proposed resolution, to the ACHP with a copy to the Consulting Parties to this MOA and request that ACHP provide NPS with its comments on the resolution of the objection within thirty (30) calendar days of receiving the documentation.
2. If the ACHP does not provide comment regarding the dispute within the thirty (30) calendar-day time period, NPS will make a final decision on the dispute and proceed accordingly.
3. The NPS will document this decision in a written response to the objection that takes into account any timely comments regarding the dispute from the Signatories and Consulting Parties and provide the ACHP and all parties with a copy of such written

response.

4. The Signatories remain responsible for carrying out all other actions subject to the terms of the MOA that are not the subject of the dispute.

B. Nothing in this section shall be interpreted to require NPS to cease construction activities during the pendency of dispute resolution procedures.

IX. ADOPTABILITY

In the event that a Federal agency other than NPS provides financial assistance, permits, licenses, or approvals for the Plan, such Federal agency may become a Signatory to this MOA as a means of satisfying its Section 106 compliance responsibilities. To become a Signatory to this MOA, the agency official must provide written notice to the Signatories that the agency agrees to the terms of the MOA, specifying the extent of the agency's intent to participate in the MOA, and identifying the lead Federal agency for the Undertaking. The participation of the agency is subject to approval by the Signatories, who must respond to the written notice within thirty (30) calendar days, or the approval will be considered implicit. Any other modifications to the MOA will be considered in accordance with Stipulation X.

X. AMENDMENTS TO THE MOA

Any Signatory to this MOA may request that it be amended. The Signatories will consult for no more than thirty (30) calendar days (or another time period agreed upon by all Signatories) to consider such amendment. The amendment will be effective on the date a copy, signed by all the Signatories, is filed with the ACHP.

XI. NON-COMPLIANCE, TERMINATION, AND WITHDRAWAL

A. If any Signatory to this MOA determines that the terms of the MOA will not or cannot be carried out, that Signatory will immediately notify the other Signatories in writing and consult with them to seek resolution or amendment pursuant to Stipulations VIII or X of the MOA. If within sixty (60) days a resolution or amendment cannot be reached, any Signatory may terminate their participation in the MOA upon written notification to the other Signatories. Once the MOA is terminated, NPS must either (a) execute a new MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. NPS will notify the Signatories as to the course of action it will pursue.

B. Nothing in this section shall be interpreted to require NPS to cease construction activities after termination of the MOA pursuant to this section.

XII. SIGNATURES AND EFFECTIVE DATE

This MOA may be executed in counterparts, with a separate page for each signatory. This MOA will become effective immediately upon execution by all Signatories. The NPS will

ensure that each signatory party is provided with a copy of the fully executed MOA. Execution and implementation of this MOA evidences that NPS has considered the effects of this Undertaking on historic properties and satisfied its responsibilities under Section 106 of the NHPA and its implementing regulations.

SIGNATURES AND EXHIBITS FOLLOW ON SEPARATE PAGE

MEMORANDUM OF AGREEMENT
AMONG
THE NATIONAL PARK SERVICE,
THE NATIONAL CAPITAL PLANNING COMMISSION,
DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,
VIRGINIA STATE HISTORIC PRESERVATION OFFICE, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE TRIUMPHAL ARCH PROJECT

NATIONAL PARK SERVICE

_____

Jennifer Madello — Date
Superintendent
George Washington Memorial Parkway

MEMORANDUM OF AGREEMENT
AMONG
THE NATIONAL PARK SERVICE,
THE NATIONAL CAPITAL PLANNING COMMISSION,
DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,
VIRGINIA STATE HISTORIC PRESERVATION OFFICE, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE TRIUMPHAL ARCH PROJECT

DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE

_____

David Maloney Date
DC Historic Preservation Officer

MEMORANDUM OF AGREEMENT
AMONG
THE NATIONAL PARK SERVICE,
THE NATIONAL CAPITAL PLANNING COMMISSION,
DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,
VIRGINIA STATE HISTORIC PRESERVATION OFFICE, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE TRIUMPHAL ARCH PROJECT

VIRGINIA STATE HISTORIC PRESERVATION OFFICE

_____

_____

VA Historic Preservation Officer Date

MEMORANDUM OF AGREEMENT
AMONG
THE NATIONAL PARK SERVICE,
THE NATIONAL CAPITAL PLANNING COMMISSION,
DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,
VIRGINIA STATE HISTORIC PRESERVATION OFFICE, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE TRIUMPHAL ARCH PROJECT

ADVISORY COUNCIL ON HISTORIC PRESERVATION

_____

Executive Director Date

The Committee of 100
on the Federal City

945 G Street, N.W., Washington, D.C. 20001 ◆ www.committeeof100.net ◆ info@committeeof100.net

September 21, 2026 By email: tammy_stidham@nps.gov

Ms. Tammy Stidham, Associate Regional Director
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Section 106 Consultation, Triumphal Arch – Comments of the Committee of 100 on the Federal City: Proposed MOA and Other Matters

Dear Ms. Stidham:

On behalf of the Committee of 100 on the Federal City ("Committee of 100"), we write in response to your request to the Consulting Parties to provide written comments on the proposed Memorandum of Agreement ("MOA") on the proposed Triumphal Arch (the "Project").

1. As a preliminary matter, and as previously conveyed to you by email on September 17, 2026, we object to the three and a half day comment deadline stated in your request. Because this is a major substantive proposal, it is simply unreasonable and inconsistent with the purpose and spirit of the Section 106 process to provide only three and a half working days for the Consulting Parties to respond.

2. Before providing comments on the proposed MOA, we would like to address the subject of the newly-proposed military use of the Triumphal Arch.

During the September 9, 2026, Consulting Party meeting hosted by NPS, you were expressly asked about whether there was any change in the proposed use of the Triumphal Arch for military purposes:

> "*Paul Edmondson, Committee of 100*: Just a quick follow-up question on Secretary Burgum's statement. He referred to what's been previously called the public viewing platform as a military viewing platform. Does that indicate any change of purpose or change of use intended for this property?
>
> "*Tammy Stidham, National Park Service*: Not that I am aware."

Despite this, as widely publicized, over the past weekend President Trump announced that the proposed arch is now planned to be a "top grade" military complex and will "house, store, and have the rapid ability to use large numbers of drones, plus Snipers, on both the roof and plaza areas, and additionally have and hold large quantities of sniper ammunition in storage." Given this, it appears that Secretary Burgum's statement on September 3, 2026, was either prescient, or that he had prior knowledge of plans to use the arch as a military facility which had not been shared with the National Park Service.

On behalf of the Committee of 100, we request that the National Park Service pause the current Section 106 Consultation Process so that NPS and the Consulting Parties have an adequate opportunity to re-evaluate the potential impacts of the Project and any related alternatives or mitigation that should be considered in light of this new information regarding its proposed use.

To that end, we ask that you provide any unclassified documentation relevant to the new proposed use of the arch as a "desperately needed National Security structure," as described by President Trump. Given the fact that the arch is now apparently proposed as a dual-use commemorative monument and a military facility and ammunition storehouse—to be located in the middle of the George Washington National Memorial Parkway, less than 50 yards from the Arlington Memorial Bridge, and less than 500 yards from Arlington National Cemetery—we believe that its potential impacts on the cultural environment must be reassessed.

If the National Park Service is seeking to invoke a waiver of the National Historic Preservation Act due to an "imminent threat" to the national security under Section 110(j) of that statute and its related regulations at 36 CFR Part 78, or under the emergency provisions of 36 CFR § 800.12, please provide the Consulting Parties with documentation of NPS's compliance with the applicable requirements of those regulations.

Additionally, and as we have stated previously, the Project as proposed cannot be implemented by NPS in the absence of Congressional authorization under the Commemorative Works Act, 40 U.S.C. §§ 8901–8909, the Height of Buildings Act, Pub. L. No. 61–196, 36 Stat. 452, and 40 U.S.C. §8106. We are not aware that a stated dual use to include military purposes would somehow exempt the project from those three statutes.

3. Finally, our comments on the proposed MOA are necessarily brief given the short time given to respond, but they are as follows:

- For reasons detailed in our letter of September 16, 2026, the Committee of 100 disagrees with the statement in the proposed introductory "whereas" clauses that the undertaking is location-dependent and is "grounded in the historic planning and design intent for the Arlington Memorial Bridge, Memorial Avenue, Columbia Island, and Memorial Circle corridor." We consider that explanation to be misguided, if not disingenuous.
- The Committee of 100 believes that the mitigation measures NPS proposes to take in connection with the Arch as detailed in the MOA are completely inadequate and, we suggest, superficial. While we acknowledge (while disputing) the view of the National Park Service that a different location for the Project would not meet what you have described as a "location-dependent" need (based on the 1925 congressional authorization of a *completely* different—and subsequently rejected—commemorative design at Columbia Island), NPS has not adequately explained why the proposed design of the arch is somehow immutable. In particular, even if truly "location-dependent," NPS has failed to seriously consider design changes such as changes in height (which would obviously mitigate the impact of the Project). During the September 9, 2026, Consulting Party meeting you stated, "there was an exploration of different heights for the arch [and] it was determined that smaller heights blocked views instead of framing them." But even if this is the case (which we also dispute), elimination of the enormous gilded statuary and related super-structure on top of the proposed arch would reduce its total height by some 84 feet. This simple design change would somewhat mitigate the impact, and would actually increase, rather than further block, the views framed by the arch.
- We feel strongly that the proposed "Construction Management Control" measures would not adequately mitigate the devastating impacts of the Project on ceremonial burials at Arlington National Cemetery, given public statements by federal officials that the construction would continue 20 hours per day for two to three years, and the fact that military burials at Arlington average 27 to 30 funeral services each weekday and 6 to 8

services on Saturdays. We also question whether these measures would address the serious disruption of local traffic patterns caused by the Project, not to mention the aviation risks of 320-foot high construction cranes, and not to mention the traffic and aviation impacts of the arch itself.

- In our view, documentation of the historic character and history of the existing cultural landscape and additional public interpretation of that landscape after it is forever altered is not adequate mitigation when reasonable and feasible alternatives to those damaging alterations exist.

Thank you for the opportunity to provide our additional comments.

Sincerely,

Judy Chesser

Judy Chesser
Chair

Paul Edmondson

Paul W. Edmondson
Member, Historic Preservation Subcommittee

cc:

Ms. Jennifer Madello, NPS - jennifer_madello@nps.gov
Mr. Jordan Hoagland, NPS - jordan_hoaglund@nps.gov
Mr. David Maloney, DC SHPO - david.maloney@dc.gov
Mr. Reid Nelson, Executive Director, Advisory Council on Historic Preservation - rnelson@achp.gov
Consulting Parties

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

David L. Bulova
Secretary of Natural and Historic Resources

Roger W. Kirchen
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

September 21, 2026

Ms. Tammy Stidham
Associate Regional Director, Lands and Planning
National Park Service
5300 Wellington Branch Drive, Suite 100
Gainesville, Virginia 20155

Re: Triumphal Arch at Memorial Circle—Proposed Memorandum of Agreement
Arlington, Virginia
DHR File No. 2026-4065

Dear Ms. Stidham:

On September 15, the Department of Historic Resources (DHR) received from the National Park Service (NPS) a draft Memorandum of Agreement (MOA) for the proposed undertaking. The NPS requested written comments or signature of the document by September 21.

At this time, it is DHR's opinion that the review and proposed signature of the MOA on behalf of the Virginia State Historic Preservation Office is premature. The potential Signatories and consulting parties are not in agreement regarding the completion of the identification efforts and the assessment of effects. It is not possible to determine that a Memorandum of Agreement is acceptable to resolve adverse effects to historic properties when agreement has not been reached regarding what the effects of the undertaking are. The parties have also not agreed that the proposed mitigation measures, which were only just introduced in the August 28 Assessment of Effect as conceptual, are sufficient and appropriate.

As DHR has stated in previous letters, NPS has received numerous comments from the public, consulting parties, the DC Historic Preservation Office and Virginia DHR. These comments have not been directly addressed in a manner that shows that NPS is consulting with the goal of seeking agreement where feasible on the review of this undertaking. DHR recommends that NPS directly and specifically address the comments received in response to the Assessment of Effect prior to attempting to execute an MOA.

In addition to the above procedural issues regarding the timing of the proposed MOA, the MOA as written lacks specificity and a clearly defined review process to ensure continued and effective consultation on the implementation of the Agreement. As such it is not executable in its current form.

The draft MOA falls short of the Advisory Council on Historic Preservation's guidance regarding the preparation of Agreement documents, https://www.achp.gov/initiatives/guidance-agreement-documents,

regarding the minimum expected information that should be included in the preamble and stipulations of a Section 106 Agreement document. In DHR's review we noted the following non-exhaustive list of examples:

- The draft Agreement cites but does not include several Appendices and Exhibits as such the draft Agreement does not clearly identify the APE, does not list the historic properties affected, and does not fully enumerate the adverse effects to be mitigated.
- It is not clear whether the stipulations include mitigation for all historic properties that will be adversely affected, for example the Pentagon and Arlington Ridge Park are unaddressed.
- The stipulations fail to identify the party responsible for the implementation of any of the proposed stipulations and the timeline for completion of each stipulation.
- The MOA lacks any clearly defined process for Signatories and consulting parties to review the outputs of the stipulations for sufficiency and accuracy.

Regarding the content of the MOA stipulations, it is DHR's general opinion that, while documentation and interpretation of the affected landscapes has value and should be completed prior to the implementation of the undertaking, the mitigation proposed fails to address the severity of the adverse effects. By seeking to document and interpret the affected landscapes prior to the insertion of the arch into the symbolic space, NPS will create a snapshot of the past without contextualizing the present. DHR anticipates all the proposed mitigation will do will further highlight how this undertaking has marred rather than added to these spaces. DHR recommends that meaningful mitigation should be commitment to concrete preservation and/or restoration measures on these historic properties. The proposed interpretive and documentary mitigation is focused on the landscapes themselves as merely a static built environment rather than symbolic spaces and the past and present they represent; DHR also recommends that the interpretation of these spaces should focus on the history that drove the need to build these commemorative spaces, the history of sacrifice and honor represented by Arlington National Cemetery and Arlington House, and how that past informs our use of these spaces now.

Finally, NPS originally proposed a Programmatic Agreement for this undertaking. A programmatic agreement can be utilized in accordance with 36 CFR § 800. 14 (b) when effects on historic properties cannot be fully determined prior to approval of an undertaking or for adverse effects from complex projects. The Whereas clause at the top of page four of the draft MOA states:

> "**WHEREAS**, specific design details are not developed at the concept planning level, therefore, the Triumphal Arch Assessment of Effects includes determinations from portions of the proposed Undertaking. These effects will be further assessed as part of future Section 106 reviews of individual project components, as required under the terms of this MOA;"

The stipulations also describe the need to conduct archaeological investigations in order to identify potential archaeological sites within the Area of Potential Effect. However, the subsequent stipulations contain no requirements for ongoing review of the Undertaking, continuing assessment of effects, and the potential to develop additional mitigation measures if additional adverse effects are identified. NPS has not consulted with consulting parties regarding the potential for additional, separate undertakings associated with this undertaking subject to review under Section 106. DHR request that NPS consider the appropriateness of a Programmatic Agreement based on the above information or, at a minimum, per 36 CFR § 800.4 (b) (2), ensure that a process for continued review is provided for in the proposed MOA.

Please contact me at samantha.henderson@dhr.virginia.gov or (804) 482-6088 to continue consultation on this undertaking.

Sincerely,



Samantha Henderson, Director
Review and Compliance Division

Eastern Region Office
2801 Kensington Avenue
Richmond, VA 23221
Tel: (804) 367-2323
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Western Region Office
962 Kime Lane
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Tel: (540) 387-5443
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Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

September 21, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Triumphal Arch - Section 106 Memorandum of Agreement

Dear Ms. Stidham,

The Cultural Landscape Foundation (TCLF), writes in response to your request to consulting parties to provide written comments on the proposed Memorandum of Agreement ("MOA") on the proposed Triumphal Arch. In light of President Trump's September 20, 2026, announcement on Truth Social of his intent to "convert the magnificent Triumphal Arch, planned since the Civil War Era many years ago, at the Receptive (sic) Circle adjoining the Arlington Memorial Bridge, into a top grade Military Complex/Triumphal Arch, to house, store, and have the rapid ability to use large numbers of drones, plus Snipers, on both the roof and plaza areas, and additionally have and hold large quantities of sniper ammunition in storage," which is a fundamental change in purpose and need—**this MOA is DOA.**

TCLF again registers its **very strong opposition** to siting the Arch in Memorial Circle, between the Lincoln Memorial and Arlington National Cemetery and Arlington House, and to siting a munitions storage facility in such a highly trafficked area, as a matter of public safety, and in a location symbolic of a peace, reverence, and national unity.

The National Park Service's (NPS) administration of the Section 106 review, for what would be the second largest memorial in the nation's capital, has been performative and disrespectful to one of the nation's most significant cultural landscapes. The idea that consultation would lead to a negotiated outcome was illusory—there was no attempt made "avoid" "adverse effects" by siting the Arch in another location. Consulting parties were given just three- and one-half business days to provide comments on the MOA, which may be the shortest time period ever in which comments were due on a major and permanent alteration to the Monumental Core. NPS held a second consulting parties meeting on September 9, 2026, discussing the Assessment of Effects, for which comments were due on September 16. Typically, this would have been followed by a review within NPS of the comments received. However, on September 15, NPS circulated an MOA, which suggests decisions had been made and that the consulting parties' comments, suggestions, and concerns had been completely dismissed *before* they were received.

It should be noted, too, that during the September 9 consulting parties meeting, NPS repeatedly refused to identify who at either NPS or the Department of the Interior made the decision that there was "no reasonable avoidance alternative," and that the Arch *must* go in Memorial Circle. **Who is accountable for the decision about the Arch's siting, which would permanently disfigure one of the nation's most significant cultural landscapes? Where is the transparency in this process?**

The timing of the deadline for comments on this MOA suggests NPS is working backward from the due date for submitting materials to the National Capital Planning Commission in advance of that

body's November 5, 2026, meeting at which NPS anticipated that commission would consider final approval of the Arch proposal.

As noted above, the president's announced intent for the Triumphal Arch to be a "Military Complex" is a fundament change in the stated purpose and need of this undertaking, and it is certainly well beyond NPS' putative stated intent to fulfill objectives of erecting commemorative gesture called for by the Arlington Memorial Bridge Commission in their 1924 report (a justification about which David Maloney at the D.C. State Historic Preservation Office said "doesn't pass the laugh test" and is "a manufactured idea").

Given his fundamental and consequential change in purpose and need, TCLF calls on NPS to suspend the current Section 106 review until revised designs for the Arch, which reflect its new function as a "Military Complex," are shared with the public. Until then, **this MOA is DOA.**

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

September 21, 2026

Ms. Tammy Stidham
Associate Regional Director – Lands and Planning
National Park Service National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

Dear Tammy:

In light of President Trump's statements over the weekend indicating that the Triumphal Arch is intended to become a military complex, the DC Preservation League (DCPL) lacks the information needed to provide substantive comments on the current draft Memorandum of Agreement (MOA). Because these recent developments fundamentally alter the purpose and need of the Arch project, the current proposal presented to the consulting parties no longer reflects the true scope of the undertaking or the adverse effects of this new proposal. The National Park Service must now pause the process and reinitiate the Section 106 consultation to ensure a thorough review and appropriate stakeholder consultation regarding this significantly expanded scope.

DCPL looks forward to continued consultation on this project.

Sincerely,

Rebecca Miller
Executive Director

1328 Florida Avenue NW| Washington, DC 20009 | T: 202.783.5144 | dcpreservation.org
Fay Armstrong, *President* | Greta Fuller, Vice *President* | Howard S. Berger, *Treasurer* | Melissa Cohen, AIA, LEED AP, *Secretary* | John DeFerrari, *At Large*
Jill S. Cavanaugh, FAIA, AICP | Scott DeMartino, Esq. | Katie Irwin, AIA, IIDA, LEED AP | Rob McClennan, AIA
D. Peter Sefton | James W. Shepherd, AIA, LEED | Joseph E. Taylor, AIA | Benjamin L. Williams, Esq., LEED AP | Juliet Zucker

September 21, 2026

Ms. Tammy Stidham
Associate Regional Director – Lands and Planning
National Park Service
National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

RE: Initial DC SHPO Comments on the Draft Triumphal Arch Project Memorandum of Agreement

Dear Ms. Stidham:

The DC State Historic Preservation Office (DC SHPO) is writing in response to your September 15, 2026, email circulating a draft Memorandum of Agreement (MOA) for the Triumphal Arch Project and requesting "feedback/comments on the proposed mitigation measures outlined in the MOA by 12:00 noon EST on Monday, September 21, 2026."

Considering that NPS and the consulting parties are still in the process of evaluating the adverse effects associated with the planned undertaking, we respectfully submit that it is premature to determine and finalize mitigation measures at this time.

As you are aware, on September 9, 2026, the National Park Service (NPS) hosted a second consulting parties meeting regarding the Triumphal Arch Project. The purpose of that meeting was to discuss the project's revised Assessment of Effects Report. Comments were requested one week later, on September 16, 2026, but a day before the comment deadline was set to close, NPS requested comments on its proposed mitigation measures.

NPS could have neither received nor considered all consulting party comments regarding the adverse effects of the project (including our own) before drafting the measures that are supposed to mitigate them. Our September 16, 2026, letter identified examples of adverse effects that were not included in NPS's assessment and, therefore, require further consideration before they can be resolved. Moreover, the preliminary archaeological assessment for this project has not been completed, so the potential to adversely affect archaeological resources is not yet known. Mitigation cannot be assessed for adverse effects that have not yet been fully identified and evaluated. Finally, in light of reports over the weekend that the arch is to be used for military purposes, it is also important to clarify how such uses will impact the arch's design and review what additional adverse effects these uses will cause.

We were pleased to read in your September 15 email that the NPS wishes to "…refocus the consultation on avoidance, minimization and mitigation measures…." Our September 16, 2026, letter included specific suggestions for how avoidance and minimization might be achieved. We hope the NPS finds our comments, and those of the consulting parties, useful in determining how best to proceed in accordance with regulatory requirements.

While it is premature to fully assess what mitigation may be required, we have a few preliminary comments on the mitigation-related stipulations of the recently circulated draft MOA. Broadly speaking, the suggested mitigation measures are not proportionate to the significant adverse effects of the arch that NPS has proposed to date. Many of the measures are of the sort routinely implemented for undertakings causing far fewer and much less impactful adverse effects. For example, Stipulations III.A.6-8 are routine permit conditions required for much smaller construction projects within the District of Columbia. Similarly, the suggested commitment to regularly empty and place lids on trash receptacles (Stipulation III.A.10) should be counted among NPS's daily responsibilities instead of mitigation measures. Several of the rehabilitation projects outlined in the Park Improvements section (Stipulation III.C) are also the sorts of undertakings the NPS should be implementing on a reasonably routine basis instead of as mitigation. Finally, recordation is the most rudimentary and minimal form of recognized mitigation, followed by interpretive displays, and oral histories.

The question of mitigation should be more fully considered after NPS and the consulting parties complete the assessment of adverse effects, and, consistent with "refocus[ing] the consultation on avoidance [and] minimization," only after meaningfully developing and evaluating the alternatives that could render most of the suggested mitigation measures unnecessary.

If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to receiving the information requested in our previous letter and to consulting further with all parties to continue the Section 106 review of this undertaking.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
District of Columbia State Historic Preservation Office

26-0593, 26-0495, 26-0474 and 26-0371

September 21, 2026

Tammy Stidham
Associate Regional Director, Lands and Planning
National Park Service, National Capital Region

RE: NPCA Comments on the Draft Memorandum of Agreement, Proposed Triumphal Arch at Memorial Circle, George Washington Memorial Parkway

On behalf of the National Parks Conservation Association (NPCA) and our more than 1.9 million members and supporters, thank you for the opportunity to comment on the draft Memorandum of Agreement (MOA). We incorporate by reference our earlier comments in this consultation, including our letters of July 18 and August 5, and write briefly because the undertaking described in the draft MOA no longer appears to be the one the federal government intends to build.

This past weekend, the President publicly described the Arch as a national security structure that would house drones, snipers, and stored ammunition on its roof and plaza. None of the documents shared with consulting parties contemplate those uses, including the assessment of effects, Environmental Assessment, and the draft MOA. When consulting parties asked about a change in purpose at the September 9 meeting, NPS said it was not aware of one. The draft MOA even proposes a climate-controlled public exhibit space in the base of the Arch, which shows how far plans have drifted from what is now being described. An armed security installation at the ceremonial entrance to Arlington National Cemetery would bring effects this consultation has never examined, including restricted access to Memorial Circle and Memorial Avenue, security perimeters and hardening, additional lighting, and the storage of munitions beside one of the most solemn landscapes in the country. We ask NPS to pause the consultation, share what it knows about the intended use, and revisit the Area of Potential Effects, the effects findings, and the environmental review before any agreement moves toward signature.

Even setting that development aside, the draft MOA does not resolve the adverse effects NPS has documented. The letter declares the undertaking as location-dependent and treat relocation as a materially different project, which removes avoidance from consideration by definition rather than by analysis. The same reasoning has kept smaller or modified designs off the table. The MOA acknowledges that the area of potential effects includes 31 National Historic Landmarks, yet it contains no measure that changes the Arch's height, mass, siting, or lighting. NPS is required to minimize harm to those Landmarks to the maximum extent possible, and the Service's own Landmarks staff have already concluded that minimization is not possible without relocating or abandoning the project. In place of minimization, the MOA offers documentation and interpretation: landscape surveys, photography, oral histories, webpages, QR codes on maritime history, and a webpage on the history of triumphal arches. A record of a landscape made before it is altered only documents the loss, and several of the proposed park improvements are routine stewardship NPS should be doing regardless.

We are also concerned about how the agreement would operate. The MOA states that design details have not been developed and that effects will be assessed in future reviews of individual components, which carries forward the deferred approach we objected to in the draft Programmatic Agreement while fixing the outcome now. Three separate provisions state that nothing requires NPS to stop construction, whether

during review of unanticipated discoveries, during dispute resolution, or even after the agreement is terminated. The construction measures describe plans to be written later without specific limits, thresholds, or commitments tied to the funeral schedule at Arlington National Cemetery, where services take place throughout each weekday and on Saturdays. Veterans service organizations and Gold Star families appear only as potential oral history interviewees rather than as parties with a voice in the outcome.

Finally, the comment period is not adequate for an agreement meant to resolve effects on 261 historic resources, and the questions we have raised about the Finding of No Significant Impact and the absence of congressional authorization under the Commemorative Works Act remain unanswered.

NPCA values the professionalism and good faith your team has brought to this consultation, and we remain committed to participating. For the reasons above, we cannot support execution of this MOA. For the reasons above, we cannot support execution of this MOA. We urge NPS to pause the Section 106 process altogether and begin it again once the purpose and use of the structure are fully disclosed, so that the Area of Potential Effects, the effects findings, the environmental review, and a genuine range of alternatives, including the locations identified by the District of Columbia State Historic Preservation Officer and meaningful design changes at the current site, can be reconsidered on an accurate record and with adequate time for consulting parties to respond.

Sincerely,



Edward Stierli
Vice President of Government Affairs
National Parks Conservation Association
EStierli@npca.org
777 6th Street NW, Suite 700
Washington, DC 20001

National Trust *for* Historic Preservation®

September 21, 2026

Tammy Stidham
Associate Regional Director – Lands & Planning
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

via email: tammy_stidham@nps.gov

Re: Draft Memorandum of Agreement Regarding Triumphal Arch Project

Dear Ms. Stidham,

The National Trust is alarmed by the National Park Service's ("NPS's") premature circulation of a Draft Memorandum of Agreement Regarding the Triumphal Arch Project ("Draft MOA"). The Section 106 consultation for this undertaking has not been properly conducted nor concluded, and numerous significant issues raised by a chorus of consulting parties and the DC and VA State Historic Preservation Officers ("SHPOs") remain unresolved. The fact that NPS is requiring all comments on the Draft MOA to be submitted in only 3.5 business days is an unreasonably short amount of time for consulting parties and SHPOs to review a complex agreement document, especially for an undertaking that will cause severe adverse effects to dozens of our nation's most important historic places.

We are even more shocked and alarmed by yesterday's announcement that the proposed Arch would actually be a military complex, with drones, snipers, and "large quantities" of ammunition stored inside. While we understand that NPS staff may not have been aware of this radical change in plans prior to preparing the current Draft MOA, it clearly compels a substantial revision to the entire review process under Section 106 and the National Environmental Policy Act ("NEPA").This new statement of purpose and need for the proposed Arch also further calls into question NPS's assertion that this undertaking is somehow related to the 1924 Memorial Bridge Commission Report, which does not propose any military activities at Memorial Circle.

The actions by NPS to limit public comment are directly contrary to multiple laws, as well as the spirit and intent of the NHPA and NEPA. For example, 36 C.F.R. § 800.2(d)(1) states that: "[T]he views of the public are essential to informed Federal decision making in the section 106 process. The agency official shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and the relationship of the Federal involvement to the undertaking."

600 14th Street NW Suite 610 Washington, DC 20005
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By limiting the comment period for the Draft MOA to only 3.5 business days, and eliminating public comment altogether under NEPA, NPS is ignoring the massive "interest of the public in the effects on historic properties". The 3.5 day comment period is also highly inappropriate given "the nature and complexity of the undertaking and its effects on historic properties". This undertaking is extremely complex due to the national importance of the historic resources that will be adversely affected and the unique nature of Arlington National Cemetery, which demands unparalleled respect. This undertaking is also entirely a federal action: there is no permit applicant or intended recipient of funds who would be harmed by the federal government providing reasonable time for public comment.

The circulation of the Draft MOA is also premature because the proposed undertaking remains out of compliance with a litany of federal laws. As the National Trust and other parties have repeatedly informed NPS, this undertaking violates the Commemorative Works Act, 40 U.S.C. §§ 8901–8910, the Height of Buildings Act, Pub. L. 61-196, 36 Stat. 452, Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303(c); 23 C.F.R. Part 774, Section 110(f) of the National Historic Preservation Act, 54 U.S.C. § 306107, and the National Environmental Policy Act, 42 U.S.C. §§ 4332(2)(C). This consultation and u.ndertaking have also not properly complied with multiple statutory and regulatory provisions implementing the National Historic Preservation Act, including 36 C.F.R. §§ 800.6(a), 800.16(*l*), and 800.5(c)(2); 54 U.S.C. §§ 306101-02, 306108, and 306131, and many more. The premature issuance of the Draft MOA with no concern for this breathtaking array of legal deficiencies would be overtly arbitrary and capricious, and a clear violation of the Administrative Procedure Act, 5 U.S.C. §§ 551–559. NPS must halt its efforts to conclude this Section 106 consultation and address these issues, which have been repeatedly raised by both SHPOs and consulting parties.

The Draft MOA is also deeply flawed as written. First and foremost, the proposed stipulations for the resolution of adverse effects in Section III are inadequate. The stipulations fail to require any meaningful avoidance, minimization, or mitigation of this undertaking's adverse effects, which is unfortunately consistent with NPS's position throughout this consultation. The National Trust, as well as the SHPOs and other consulting parties, have consistently opined that NPS's refusal to consider any alterations to the location, height, scale, mass or design of the proposed Arch is inconsistent with NPS's responsibility to seek to avoid or minimize the severe and widespread adverse effects that this undertaking will cause. 36 C.F.R. § 800.6(a). NPS's tacit assertion that this undertaking is somehow shielded from those considerations because it is a "location dependent undertaking" is both legally fictitious and specious. All other "location dependent" undertakings, including the construction of other new buildings and monuments on specific federal properties, have always been required to consider adjusting their location, height, scale, mass, and design to avoid and minimize adverse effects. In any event, we continue to support the position of the DC SHPO that NPS must fully consider as an alternative the pair of columns reviewed by Congress in 1924-25, with a height of 166 feet and a separation of 300 feet between the two columns, as that alternative would fulfill the "location-dependent" criterion being imposed by NPS.

The resolution actions that are proposed in Section III.D. and III.E. of the Draft MOA are also all relatively standard, bare minimum mitigation actions that do not constitute a

reasonable level of effort on the part of NPS to resolve this undertaking's severe adverse effects, especially given the tremendous national significance of the historic resources affected. Many of the proposed mitigation actions are also underdeveloped. For example, NPS proposes to "Require a Construction Management Plan to minimize construction-period effects to historic properties, adjacent resources, traffic circulation, visitor access, and the surrounding commemorative landscape."[1] This and other such plans should be developed *prior* to the execution of the MOA, in consultation with DC and VA SHPO and the consulting parties. As written, this stipulation is meaningless, because there is no actual commitment to minimize any adverse effects that will be caused by the Arch's construction. The Draft MOA must be revised to include stipulations that actually accomplish the avoidance and minimization of adverse effects, rather than simply promising to plan to possibly do so in the future.

The National Trust is regrettably unable to provide NPS with a line-by-line examination of the Draft MOA's language due to the unreasonably short 3.5 day comment period. We will endeavor to provide more detailed comments to NPS in the near future. We again strongly urge NPS to pause this consultation to correct the highly significant issues of national importance that we have identified in this letter and in our previous ones, as well as to address the surprising new military purpose for this undertaking that was just announced yesterday.

Sincerely,

Elizabeth S. Merritt
Deputy General Counsel

Chris Cody
Senior Associate General Counsel

[1] Draft Memorandum of Agreement Regarding the Triumphal Arch, Pg. 11, ¶ 8.

United States Department of the Interior
NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

September 22, 2026

Mr. Reid Nelson
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Dear Mr. Nelson,

On June 5, 2026, the National Park Service ("NPS") initiated consultation pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations at 36 CFR Part 800, with the District of Columbia Historic Preservation Office ("DC HPO") and the Virginia Division of Historic Preservation ("VA DHR") for the proposed Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway, a unit of the national park system. Included with the initiation of consultation correspondence was a list of invited consulting parties, Draft Assessment of Effects, Phase IA Archaeological Assessment; and the Draft Programmatic Agreement. In addition, NPS requested expedited consultation pursuant to 36 CFR § 800.3(g) and requested a response by June 15, 2026.

Also on June 5, 2026, the NPS notified the Advisory Council on Historic Preservation ("ACHP") that NPS had determined that the proposed Triumphal Arch Project would result in adverse effects meeting the criteria of 36 CFR 800.5(a)(1). The NPS invited ACHP to participate in consultation regarding this undertaking pursuant to 36 C.F.R. § 800.6(a)(1). ACHP responded on June 15, 2026 that it would formally participate in consultation of the project.

In compliance with Section 106 of the National Historical Preservation Act, NPS prepared an Assessment of Effects report ("AoE") describing the undertaking and analyzing potential adverse effects on historic properties, including archeological resources, within the project area. The AoE along with associated appendices and a draft programmatic agreement were posted to the NPS Planning, Environment & Public Comment ("PEPC") and made available for public comment from June 5 – June 15, 2026. The comment period allowed consulting parties, organizations, and members of the public an opportunity to review the AoE and the draft Programmatic Agreement and to provide feedback on these materials, consistent with the requirements of 36 CFR Part 800.

On June 15, at the end of the comment period, NPS hosted a meeting for all consulting parties to provide feedback on the AoE. Attendees included representatives of VA DHR, DC HPO, National Capital Planning Commission, Commission of Fine Arts, Arlington County, ACHP, Architect of the Capitol, the NPS NHL Program, Trump-Kennedy Center for the Performing Arts, and various representatives from the NPS.

During the June comment period, NPS received a total of 100,936 comments. NPS downloaded the public comments from PEPC and other channels and organized the comments by subject matter themes. NPS subject-matter experts reviewed the comments, synthesized them into broader themes, and prepared a comment report.

Due to additional public interest, NPS reopened and extended the opportunity to comment from July 10 to July 30, 2026. During this reopened comment period, the NPS received a total of 6,254 comments. A comment summary addendum was created in the same manner as the original comment summary. Most of the comments submitted during this comment period were already addressed in the summary report prepared for the June comment period. To avoid redundancy, the addendum addressed only the new comments received.

On July 10, 2026, NPS requested that consulting parties provide their comments and concerns by July 19 regarding the list of historic properties that was released on June 5, 2026. Specifically, NPS requested input to determine whether to expand the originally proposed Area of Potential Effects ("APE"). During that comment period, NPS received comments from DC HPO; VA DHR; Washington Headquarters Services/Department of War; Arlington County Historic Preservation Program; National Parks Conservation Association; The Cultural Landscape Foundation; Arlington Historical Society; American Institute of Architects |DC; Committee of 100 on the Federal City; National Mall Coalition; and National Trust for Historic Preservation. NPS addressed the comments received by drafting a revised APE which included additional historic properties that may be adversely affected by the proposed Arch.

On July 28, 2026, the NPS requested DC HPO, VA DHR, and consulting parties review and comment on the revised APE and list of historic properties by August 6, 2026. By the close of that comment period, NPS received comments from Family Circle of Descendants at Arlington House; National Capital Planning Commission staff; DC Preservation League; National Mall Coalition; National Parks Conservation Association; The Cultural Landscape Foundation; VA DHR; Arlington County Historic Preservation Program; NPS National Historic Landmarks Program; Institute of Architects |DC; and National Trust for Historic Preservation. After reviewing these comments, NPS revised the AoE.

On August 28, 2026, NPS requested consulting party review of the revised AoE by September 4, 2026. Due to several requests for additional time, NPS extended the deadline to September 16, 2026. Additionally, during this comment period, NPS hosted an additional consulting party meeting on September 9, 2026. During this meeting, NPS attempted to focus on presenting and reviewing the updated AoE for the proposed Triumphal Arch at Memorial Circle. NPS spoke on the project's scope, historic property evaluations, adverse effect determinations, and the rationale behind the project's location and design choices. Rather than engage in discussion about proper methods of avoiding, minimizing, and mitigating adverse effects as required by 36 CFR Part 800, several consulting parties instead chose to focus on threshold legal questions unrelated to the Section 106 process which are currently subject to active litigation.

In an effort to reach consensus between the consulting parties, NPS drafted a memorandum of agreement ("MOA") and sent it to consulting parties on September 15, 2026, requesting that consulting parties either sign or provide feedback by September 21, 2026. By close of that comment period, NPS received comments from DC Preservation League; The Cultural Landscape Foundation; The Committee of 100; VA DHR; Arlington County Historic Preservation Program; the National Trust for Historic Preservation; the National Parks

Conservation Association; and DC HPO. The comments displayed deep opposition to the project as a whole, including fundamental aspects such as the location, design, and height of the proposed Arch. One commenter stated: "[t]he idea that consultation would lead to a negotiated outcome [is] illusory." Another simply said: "this MOA is DOA."

During the consultation, the Department considered comments regarding the APE, identification of historic properties, assessment of effects, and alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects. Despite those efforts, consultation has not resulted in agreement on these topics. Specifically, NPS has been unable to reach agreement with the consulting parties regarding the extent to which adverse effects can be avoided or minimized, and the sufficiency of proposed mitigation measures.

The DC HPO and VA DHR have expressed the view that the adverse effects of the undertaking cannot be adequately resolved through documentation, interpretation, construction noise mitigation, or other conventional mitigation measures, and have insisted that the only substantive way to mitigate the effects is by changing the location or dimensions of the proposed Triumphal Arch. DC HPO and VA DHR, consulting parties, and members of the public have identified relocation, no-build, substantial reduction in height and massing, or a fundamentally different open-axis or landscape-based commemoration as the measures most likely to avoid or substantially reduce adverse effects. NPS has considered the views of the consulting parties and determined that adopting these measures would alter the fundamental nature of the proposed undertaking and fail to achieve its goals. Because the consulting parties have had ample opportunity to express and discuss their views, and the principal unresolved issues concern the undertaking's location, scale, massing, and relationship to the historic viewshed, additional consultation on the existing proposal is unlikely to result in agreement on an MOA to resolve adverse effects.

NPS recognizes the importance of the affected historic properties and the seriousness of the concerns raised during consultation, however, based on the consultation to date, does not believe that continued efforts to revise the MOA would resolve the central disagreement over whether the undertaking's adverse effects can be adequately avoided, minimized, or mitigated while maintaining the project in its proposed location and general design.

Sincerely,



Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service

Enclosures

Travis Voyles
Vice Chairman

Reid J. Nelson
Executive Director

September 24, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

Ref: *Triumphal Arch Project*
Washington, DC and Virginia
ACHP Case #025123

Dear Ms. Stidham:

On September 22, 2026, the National Park Service (NPS) forwarded a summary of its consultation efforts for the referenced undertaking to the Advisory Council on Historic Preservation (ACHP). The correspondence from NPS outlines the steps it has taken to comply with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800).

As you know, the ACHP has participated in the Section 106 consultation to seek ways to avoid, minimize, or mitigate adverse effects to historic properties that would result from this undertaking since June 15, 2026. We acknowledge the NPS's efforts to identify historic properties and assess effects to them, as well as to propose mitigation to resolve adverse effects as a result of the undertaking. The consideration of alternatives to avoid or minimize adverse effects is particularly important for the National Historic Landmarks within the undertaking's Area of Potential Effect, given the NPS's responsibility to meet the requirements of Section 110(f) of the NHPA.

It is clear that the proposed undertaking and its potential effects on historic properties have raised significant public interest, and the NPS stated in its September 22, 2026 correspondence that it believes additional consultation on the existing proposal is unlikely to result in agreement on an MOA to resolve adverse effects. Further, the NPS stated that implementation of alternatives to avoid or minimize the adverse effects would alter the fundamental nature of the proposed undertaking and fail to achieve its goals. In recognition of the public's significant concerns regarding the adverse effects the undertaking would pose to historic properties, we are hereby terminating consultation pursuant to 36 CFR § 800.7(a)(4).

In accordance with section 800.7(c), the ACHP will develop and transmit its final comments to the Secretary of Interior. While this section of the regulations affords the ACHP 45 days to develop and transmit our comments, we will endeavor to provide them by October 7, 2026. This timeline includes the regulatory requirement for the ACHP to provide an opportunity for the agency official, all consulting parties, and the public to provide their views. With this notice of termination, we are also requesting that

all consulting parties provide any views on this undertaking and proposed resolution of adverse effects to us by 11:59 p.m. ET on September 29, 2026. Additionally, consulting parties will be invited to participate in a meeting with the ACHP to verbally provide their comments; the invitation will be forthcoming shortly. Upon receipt of the ACHP's comments, the Secretary of the Interior shall take our comments into account and respond to them before reaching a final decision on the undertaking, as required by section 800.7(c)(4).

Should you have any questions or require additional assistance, please contact Jaime Loichinger, Director of the Office of Federal Agency Programs, at (202) 517-0219 or by e-mail at jloichinger@achp.gov and reference the ACHP Project Number above. We look forward to providing our comments to conclude the Section 106 process for this project.

Sincerely,



Travis Voyles
Vice Chair

Travis Voyles
Vice Chairman

Reid J. Nelson
Executive Director

October 9, 2026

The Honorable Doug Burgum
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Ref: *Proposed Triumphal Arch*
Washington, District of Columbia, and Virginia
ACHP Case #025123

Dear Secretary Burgum:

In accordance with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800), I am writing to convey to you the final comments of the Advisory Council on Historic Preservation (ACHP) regarding the Triumphal Arch Project. On September 24, 2026, the ACHP terminated consultation under 36 CFR § 800.7(a), having determined that further consultation would not be productive. In accordance with 36 CFR § 800.7(c), the ACHP is providing these comments to you to consider and respond to before you make a final decision regarding the undertaking.

Please note that these comments are applicable to the undertaking and its effects on historic properties as described by the National Park Service (NPS) in its correspondence to the ACHP, dated September 22, 2026.

Undertaking Description and Section 106 Consultation

As detailed by the NPS, the proposed undertaking includes construction of a Triumphal Arch (Arch) within Memorial Circle in Washington, DC, associated plaza and landscape improvements, supporting utility and stormwater infrastructure, traffic and pedestrian circulation modifications, security features, lighting, and temporary staging and laydown areas required for construction. The Arch would be an approximately 250-foot-tall reinforced concrete structure clad in granite and ornamented by a central winged figure and two eagles positioned above each Arch leg. Dimensions will be finalized during future design efforts. The principal architectural component would rise approximately 166 feet above finish grade, with surmounting statuary extending the total height to approximately 250 feet. The Arch would serve as a monumental architectural feature aligned with the axis between Memorial Avenue and the Arlington Memorial Bridge.

The NPS initiated consultation for this undertaking on June 5, 2026, at which time it requested to expedite consultation by addressing multiple steps in 36 CFR §§ 800.3 through 800.6 concurrently. Following the initiation of consultation, the NPS held two consultation meetings, on June 15, 2026, and September 9, 2026, which provided an opportunity for approximately 40 consulting parties to provide feedback on the undertaking, the NPS's identification efforts, its assessment of effects, and the proposed resolution of adverse effects through a Section 106 agreement document. The NPS requested written comments on

these points from consulting parties throughout this timeframe. As required by Section 106, the NPS also provided an opportunity for the public to comment on the undertaking, resulting in approximately 107,000 comments.

Consulting parties, including the State Historic Preservation Officers for the District of Columbia and Virginia, raised numerous concerns to the NPS, including whether alternatives to meet a similar purpose and need for the undertaking had been considered to meet the NHPA's Section 110(f) requirements (54 U.S.C. § 306107), and whether the NPS's identification efforts and assessment of effects were sufficient for an undertaking of this scale. Consulting parties and members of the public also raised concerns about the number of historic properties that may be located within the undertaking's area of potential effects and adversely affected by the undertaking.

Adversely affected historic properties noted by the NPS include six National Historic Landmarks (NHLs), eight historic districts, eight cultural landscapes, and 20 individual or other types of historic properties. The NPS further noted that archaeological resources, which are still being identified, would also be adversely affected by the undertaking. Of particular concern to consulting parties were the potential effects to the Arlington National Cemetery Historic District, as home to the nation's fallen soldiers.

The NPS indicated that since it considered the undertaking to be location dependent, it was unable to employ any of the avoidance alternatives considered such as relocating the undertaking. The NPS also assessed and deemed other design options infeasible as they would result in fully obscuring the views between the Lincoln Memorial and Arlington National Cemetery. In addition, because the Arch is intended to celebrate 250 years of American independence, the NPS stated that potential smaller heights were not considered representative of this milestone. The NPS noted, however, that minimization could be achieved through construction management controls, and that mitigation would include archaeological investigations, park improvements, documentation, and public interpretive materials.

Section 110(f) of the NHPA requires federal agencies, to the maximum extent possible, to undertake planning and actions necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking. The NPS stated in its Assessment of Effects, dated August 28, 2026, that avoidance through relocation would constitute a materially different undertaking rather than a reasonable avoidance measure for this undertaking. The NPS indicated that Section 110(f) does not require that all harm be eliminated where avoidance would defeat the purpose of the undertaking, and that it has met the "to the maximum extent" threshold by its identification, evaluation, consultation, consideration of avoidance, and development of minimization and mitigation measures.

In its September 22, 2026, correspondence to the ACHP, the NPS stated it had been unable to reach agreement with the consulting parties regarding the extent to which adverse effects could be avoided or minimized, and the sufficiency of proposed mitigation measures. It also stated that based on the consultation to date, it did not believe that continued efforts to revise the Memorandum of Agreement (MOA) would resolve the central disagreement over whether the undertaking's adverse effects can be adequately avoided, minimized, or mitigated while maintaining the project in its proposed location and general design.

ACHP made the decision to terminate consultation because it determined there was limited likelihood of reaching agreement on an MOA. Therefore, on September 24, 2026, the ACHP terminated consultation, and committed to providing these comments for your consideration.

Undertaking Recommendations

Based on the above summary of consultation, I offer the following recommendations for your consideration:

The NPS should continue to detail how it is meeting the requirements of Section 110(f).

The ACHP recommends the NPS, if possible, to continue to detail and provide any additional information available on its efforts in this regard and its rationale for how it is meeting the requirements of the law. While the NHPA does not prohibit adverse effects to NHLs, any additional information or explanation as to how the undertaking and its direct adverse effects to historic properties remain in the public interest in its consideration of alternatives to avoid or minimize such adverse effects would further benefit the NPS.

Particularly as it relates to Arlington National Cemetery within the Arlington National Cemetery Historic District, the NPS should continue to detail what steps it intends to take to address the adverse effects of the undertaking that would continue after the undertaking is constructed. This is important to ensure that the affected historic property will maintain its ability to convey its status and significance as a solemn resting place for those who have served our nation.

If the NPS chooses to proceed with the undertaking as described, it should determine and communicate next steps for carrying out and implementing any mitigation measures to address the adverse effects to NHLs and other historic properties.

While the draft MOA, circulated by the NPS on September 15, 2026, included numerous mitigation ideas, many of them, such as data recovery, interpretive materials and educational opportunities, will benefit in implementation from additional detail to ensure they are effective. The ACHP can provide advice on any mitigation actions or additional measures that NPS might implement or that may need or benefit from additional detail. As part of the NPS's commitment to mitigation, the NPS should consider how to incorporate opportunities to ensure these deliverables are accurate, comprehensive, and reflect the public's interest.

The NPS has the responsibility to seek and consider the views of the public in making its decision, especially recognizing that the nature of the proposed undertaking and the level of public interest in the undertaking's effects on historic properties.

While use of section 800.3(g) of the Section 106 regulations can be an effective tool for expediting reviews, challenges are anticipated in the use of this provision for those undertakings that have the potential to adversely affect historic properties of national significance and generate a large degree of public interest. In future undertakings, the NPS should continue to assess the use of this regulatory provision when the undertaking involves effects to nationally significant historic properties or NHLs, or when the effects are likely to be adverse.

Given the importance of ensuring the opportunity for the NPS to meaningfully consider comments from the parties that participated in consultation, address those comments, and incorporate that analysis into the record for the consideration of alternatives and for the development of mitigation, any further detail or opportunities that can be provided as this undertaking proceeds could also be useful for successful implementation.

As stated in the Section 106 regulations, the views of the public are essential to informed federal decision making (36 CFR § 800.2(d)(1)). More broadly, the NHPA recognizes that preservation of our national heritage is in the public interest so that the country's vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans (Section 1 of the National Historic Preservation Act, Pub. L. No. 89-665, as amended by Pub. L. No. 96-515; 54 U.S.C. § 300101). The ACHP received approximately 7,200 comments from the public during its review period; in addition to the 107,000 comments the NPS received, it is clear this undertaking and its effects on historic properties are of great importance to American citizens. As an

agency operating in the public interest, it is important that the NPS provides details of how its decision on this undertaking recognizes the public interest and its views, and how the agency will ensure the affected historic properties for which it is a steward will be maintained and enriched for those future generations (54 U.S.C. §§ 306101(a), 306102). We appreciate the NPS's extensive efforts thus far in this regard, we urge it to continue to utilize opportunities to further explain how, as an agency with the mission of conserving the scenery and the natural and historic objects within the properties it manages, it is ensuring that its actions with this undertaking are ensuring their protection for the enjoyment of future generations.

Conclusion

Section 800.7(c)(4) of the Section 106 regulations requires you, as the head of the agency, to take these comments into account in reaching a final decision on the undertaking. As stated in Section 110(l) of the NHPA (54 U.S.C. § 306114), you may not delegate this responsibility. A summary of your decision regarding the undertaking that contains the rationale for the decision and evidence of consideration of the ACHP's comments must be provided to the ACHP prior to the final decision on the undertaking and shared with the Section 106 consulting parties and the public. Once you submit your response and decision on the undertaking to the ACHP, the Section 106 review for this undertaking will be complete.

In accordance with Section 201 of the NHPA, 54 U.S.C. § 304101(f), when the office of the chairman of the ACHP is vacant, the vice chairman shall perform the functions of the chairman. Therefore, I have issued these comments in my role as vice chairman on behalf of the ACHP.

The NHPA requires that the federal government exercise leadership in the preservation of the nation's irreplaceable historic heritage. In that spirit, I look forward to your consideration of these comments and recommendations as a productive path forward for this significant undertaking which will celebrate 250 years of American independence.

Sincerely,



Travis Voyles
Vice Chairman

THE SECRETARY OF THE INTERIOR
WASHINGTON

October 9, 2026

Mr. Travis Voyles
Vice Chairman
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Dear Mr. Voyles:

The Department of the Interior is in receipt of your final comments letter dated October 9, 2026, regarding termination of the National Historic Preservation Act (NHPA) section 106 consultation for the proposed Triumphal Arch at Memorial Circle (ACHP Case #025123).

Your recommendations are appreciated and will be taken into account in reaching a final decision on the undertaking. At present, no final decision has been made with respect to the undertaking. Prior to making a final decision, I will prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Advisory Council on Historic Preservation's (Council) comments. Prior to approval of the undertaking, a copy of the summary will be provided to the Council and all consulting parties, and the record will be made available to the public for inspection. A final decision on the undertaking will not be made until the National Capital Planning Commission completes its review.

This concludes the NHPA section 106 consultation process. A copy of this letter will be provided to all consulting parties as well as to the public.

With gratitude,

Doug Burgum
Secretary

APPENDIX F

ENDANGERED SPECIES ACT AND MIGRATORY BIRD TREATY ACT CONSULTATION DOCUMENTATION

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, SW
Washington, D.C. 20242

IN REPLY REFER TO:

16 June 2026

Jerome Ford
Assistant Director, Migratory Bird Program
US Fish and Wildlife Service
Migratory Bird Program
Department of Interior Main Building, Room 3331
1849 C Street, NW
Washington, DC 20240

RE: Triumphal Arch at Memorial Circle MBTA Impacts to Birds of Conservation Concern, US Fish and Wildlife Service IPaC CONSULTATION CODE: 2026-0087688

Dear Mr. Ford,

This provides a summary of the impacts to migratory birds and potential habitat from construction of the Triumphal Arch construction project at Memorial Circle in the George Washington Memorial Parkway, National Park Service, and conservation measures that will allow for the protection of bird species under the Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-712), and the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. §§ 668-668d, USFWS 2007). This project proceeds under Section 3 of Executive Order 13186 (2001) that addresses the responsibilities of Federal agencies to protect migratory birds. The National Park Service with the US Fish and Wildlife Service work collaboratively and with proactive approaches to promote the conservation of migratory bird populations.

The major focus of this letter is to present the pre-construction conservation measures already implemented into the Triumphal Arch construction project designs to reduce impacts on wildlife habitat and outline conservation measures to be implemented to ensure potential impacts are minimized. Preconstruction efforts focused primarily on the timing of activities and the reduction of the overall project footprint and artificial nighttime lighting to protect migratory birds.

Project Overview and Description

The National Park Service (NPS) is developing a design for the construction of the proposed Triumphal Arch at Memorial Circle within the George Washington Memorial Parkway in Washington, D.C., located at the western end of the Arlington Memorial Bridge, connecting to Memorial Avenue and the entrance to the Arlington National Cemetery. The total size of the

project, including staging and access, is approximately 14 acres. (Figure 1)

The project is anticipated to begin at the end of Summer 2026. Construction would occur year-round, 20 hours per day, over an approximately two-to-three-year period. The action area is the 1.5-acres of turf grass within the Memorial Circle and also includes as the staging area approximately 12.5 acres of turf grass between the north and south lanes of Washington Boulevard, District of Columbia. After construction is complete the disturbed turf areas will be replanted. Tree removals are not currently anticipated but may occur, as needed for staging.

The Triumphal Arch would be an approximately 250-foot-tall reinforced concrete structure. Dimensions will be finalized during future design efforts. The following dimensions are current approximations. The Triumphal Arch sits on a base and will rise approximately 166 feet above finish grade with a statue extending the total height to approximately 250 feet.

When completed, exterior lighting would be installed to illuminate the Triumphal Arch and nearby area throughout the night with minimal exterior signage. The Triumphal Arch would be illuminated using a low spill, fully shielded lighting system designed to highlight only the Triumphal Arch with illumination supplemented by eight light stanchions, ranging on vertical posts from 14 to 20 feet in height, and strategically located around the intersection pointing downward. In addition, Federal Aviation Administration required anti-collision safety lighting will be incorporated into the design using the least intrusive technology available, ensuring compliance with aircraft visibility requirements while limiting unnecessary light emissions.

Migratory Bird Treaty Act 1918

The USFWS is the principal Federal agency charged with protecting and enhancing populations and habitats of migratory bird species. A migratory bird is any species or family of birds that live or reproduce in or migrate across international borders at some point during their annual life cycle.

Separate from Endangered Species Act (ESA) Section 7(a)(2) obligations is the mandated responsibilities under the MBTA to protect Spring and Fall migrating birds. USFWS identified 26 birds species with the potential to migrate over the Triumphal Arch action area. These species are listed under the Migratory Bird Treaty Act (MBTA, 16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755, as amended) and include the bald and golden eagles.

USFWS Birds of Conservation Concern

The USFWS Birds of Conservation Concern (BCC) are those species, subspecies, and populations of migratory and non-migratory birds that the USFWS has determined to be the highest priority for conservation actions and assigns BCC species occurring within the action area of projects via the Information for Planning and Consultation (IPaC) system. The Triumphal Arch project location was assigned 26 migratory BCC in USFWS IPaC Project Code-2026-0087688.

The purpose of the BCC list is to prevent or remove the need for additional ESA bird listings by implementing proactive management and conservation actions needed to conserve these species. The USFWS maintains a list of BCC in which species are prioritized and listed by Bird Conservation Regions (BCRs). The Triumphal Arch action area is located in BCR 30, the New England/Mid-Atlantic Coasts [https://nabci-us.org/resources/bird-conservation-regions-map/].

EVALUATION

There is no suitable habitat for Birds of Conservation Concern in this project's action area of 14-acres of turf grass with a small patch of landscape trees completely surrounded by existing roads.

Sensitive Species

From IPaC Project Code-2026-0087688, no federally listed endangered, threatened, or proposed listed bird species occur.

Important Bird Areas

Important Bird Areas (IBA) are sites that provide essential habitat for one or more species of birds. IBAs include sites for breeding, wintering, and/or migrating birds. IBAs are of variable sizes, but usually they are discrete sites that stand out from the surrounding landscape. IBAs may include public or private lands, or both.

The Triumphal Arch will lie between two IBAs. The IBAs represent the best habitats across the District of Columbia and Virginia for bird species at risk as well as those vulnerable to a range of threats. These two IBAs were designated by Birdlife International and US Audubon Society. Both IBAs are within the George Washington Memorial Parkway: Theodore Roosevelt Island that lies 1 mile north of the proposed project and Dyke Marsh Wildlife Preserve is located 11 miles south. These two IBAs will not be impacted by the activities of the action area.

Migratory Bird Species and Birds of Conservation Concern

For this project, the 1,106 migratory birds at eCFR :: 50 CFR 10.13 -- List of Birds Protected by the Migratory Bird Treaty Act. are narrowed down to 26 MBTA BCC (Birds of Conservation Concern) species within the IPaC Project Code-2026-0087688. The 26 MBTA species are listed below. Abbreviations used are BCC--Birds of Conservation Concern, CON--Continental US, BCR--Bird Conservation Region.

The following 10 MBTA species were confirmed in iNaturalist Professional Grade current reports of birds local within Arlington County, VA, checked for species presence.

- Bald Eagle *Haliaeetus leucocephalus*, Non-BCC Vulnerable, Breeds Oct 15 to Aug 31
- Blue-winged Warbler *Vermivora cyanoptera*, BCC – BCR, Breeds May 1 to Jun 30
- Canada Warbler *Cardellina canadensis*, BCC Rangewide (CON), Breeds May 20 to Aug 10
- Chimney Swift *Chaetura pelagica*, BCC Rangewide (CON), Breeds Mar 15 to Aug 25
- Prairie Warbler *Setophaga discolor*, BCC Rangewide (CON), Breeds May 1 to Jul 31

- Prothonotary Warbler *Protonotaria citrea*, BCC Rangewide (CON), Breeds Apr 1 to Jul 31
- Scarlet Tanager *Piranga olivacea*, BCC – BCR, Breeds May 10 to Aug 10
- Wood Thrush *Hylocichla mustelina*, BCC Rangewide (CON), Breeds May 10 to Aug 31
- Black-billed Cuckoo *Coccyzus erythropthalmus*, BCC Rangewide (CON), May 15-Oct 10
- Rusty Blackbird *Euphagus carolinus*, BCC – BCR, Breeds elsewhere

The following 16 MBTA species were not in iNaturalist as locally present but are expected to fly over the action area during Spring and Fall migrations.

- Bobolink *Dolichonyx oryzivorus*, BCC Rangewide (CON), Breeds May 20 to Jul 31
- Cerulean Warbler *Setophaga cerulea*, BCC Rangewide (CON), Breeds Apr 29 to Jul 20
- Eastern Whip-poor-will *Antrostomus vociferus,* BCC Rangewide (CON), May 1 to Aug 20
- Golden Eagle *Aquila chrysaetos,* Non-BCC Vulnerable, Breeds elsewhere
- Grasshopper Sparrow *Ammodramus savannarum perpallidus,* BCC – BCR, Jun 1-Aug 20
- Kentucky Warbler *Geothlypis Formosa*, BCC Rangewide (CON), Breeds Apr 20 to Aug 20
- King Rail *Rallus elegans,* BCC Rangewide (CON), Breeds May 1 to Sep 5
- Least Tern *Sternula antillarum antillarum*, BCC Rangewide (CON), Breeds Apr 25-Sep 5
- Lesser Yellowlegs *Tringa flavipes,* BCC Rangewide (CON), Breeds elsewhere
- Pectoral Sandpiper *Calidris melanotos*, BCC Rangewide (CON), Breeds elsewhere
- Red-headed Woodpecker *Melanerpes erythrocephalus*, BCC Rangewide (CON), Breeds May 10 to Sep 10
- Ruddy Turnstone *Arenaria interpres morinella,* BCC – BCR, Breeds elsewhere
- Semipalmated Sandpiper *Calidris pusilla*, BCC – BCR, Breeds elsewhere
- Short-billed Dowitcher *Limnodromus griseus,* BCC Rangewide (CON), Breeds elsewhere
- Whimbrel *Numenius phaeopus hudsonicus,* BCC – BCR, Breeds elsewhere
- Willet *Tringa semipalmata,* BCC Rangewide (CON), Breeds Apr 20 to Aug 5

IMPACT ASSESSMENT

Potential Impacts of Stressors

NPS is committed to the management of stressors caused by proposed projects and will use conservation measures to reduce impacts by following the nationwide avoidance and minimization measures for migratory birds [Nationwide Avoidance & Minimization Measures for Birds | FWS.gov].

Habitat Impacts—Developed Area

The action area has limited habitat for many bird species. None of the 26 BCC species that USFWS listed use Developed Areas (i.e., turf patches surrounding by impervious roads) as primary breeding, foraging areas or nesting. Instead, any impacts will be during the Spring and Fall migrations when birds pass over the action area at night.

The construction is anticipated to begin at the end of Summer 2026 when most MBTA species' nesting is done, and birds are flocking to migrate or have migrated out of the area.

The approximately 12.5-acre staging area will be in place when migratory birds return during the Spring migration and will continue to be occupied for two to three years during construction. No nests are anticipated to be disturbed. After restoration, the staging area returns as a turf median between north and south lanes of Washington Boulevard that is already maintained by mowing for visual inspection requirements established by the Federal Highway Administration.

Noise Impacts

The majority of noise impacts will be temporary during the construction process, starting at the end of Summer 2026. These noise impacts will end once construction is complete. The surrounding roads carry heavy traffic year-round, which will continue in the long term.

Artificial Lighting Impacts

During construction activities that occur 20 hours per day, time restrictions are not possible. The area is seasonally prone to fog and infrequent low cloud ceilings, causing migrating birds to fly low.

ASSESSMENT OF RISK

The National Park Service is using a landscape stewardship approach to planning and designing Triumphal Arch. NPS has taken measures to avoid and minimize permanent impacts to wildlife habitat and minimized the action area limits-of-disturbance footprint the minimum practicable while allowing safe construction of the Triumphal Arch.

The Triumphal Arch will be located within a traffic circle covered in turf that provides minimal habitat to MBTA species. Specific design requirements for minimal artificial lighting during construction and long-term building illumination are required.

The action area may have bird species already adapted to breeding and foraging near human activities and disturbance, and therefore over the two to three years during construction, potential impacts to foraging or nesting behavior due to noise and disturbance is expected to be very minimal.

Overall, impacts are expected to be minor and associated with temporary displacement from foraging areas within the construction workspaces. Existing activities like regular mowing in the road median and rights-of-way would already preclude many viable ground nests.

Impacts to migratory birds discussed are avoided and minimized to reduce impacts to insignificant levels prior to and during the design phase. To further ensure potential impacts to migratory birds are avoided by the construction of the Triumphal Arch, NPS will continue to implement Best Management Practices, whenever practicable. As a result, potential impacts on migratory birds, and most importantly BCCs, will be reduced and minimized.

Conservation Measures for Conserving Migratory Birds

NPS will implement Best Management Practices during the construction and maintenance of the Triumphal Arch project to protect MBTA species, populations, and habitat to increase long-term sustainability of bird populations through the following efforts:

1. All activities within this project are constrained to previously disturbed areas such as traffic circles and road medians and rights-of-way planted with turf and surrounded by impervious surfaces of Washington Boulevard.
2. There is a minimal semi-natural habitat in a small patch of planted landscape trees in the staging area. If any of these trees need to be removed, it will be done from September 1 to March 31, which is outside the nesting period for most migratory birds.
3. This project will not disturb or pass through any Important Bird Areas; there are no permanent habitat alterations.
4. Replanting the area after construction with turf will use other native plants, as needed, that are not attractants with fruit or provide preferred nesting tree species in the road median and rights-of-way.
5. The Triumphal Arch will not result in any noise increases above what is already produced (ambient) in the action area.
6. To address concerns during peak MBTA species migration periods in Spring and Fall, construction site lights will be down shielded or directed downward to avoid light transmission into the sky. Artificial lights illuminating night work will be kept as close to the ground as possible.
7. After the Triumphal Arch is complete, LED light bulbs, such as 2200k to 3000k, will be used as much as possible to protect and avoid disorientation of MBTA species.

SUMMARY

The Triumphal Arch construction project adheres to responsibilities described in EO 13186 to strengthen migratory bird conservation.

NPS has avoided and minimized potential impacts to MBTA species prior to and during the design phase and will use conservation measures and BMPs for the planned implementation. The construction of the Triumphal Arch is adaptive, and potential impacts will be re-evaluated, as needed, with any new, appropriate additional conservation measures. This ensures the least environmentally damaging practicable approaches will protects MBTA species while completing the construction of the Triumphal Arch.

We certify that we have used the best scientific and commercial data available to complete this analysis.

Sincerely,

J. Patrick Campbell
Associate Regional Director
Resource Stewardship & Science
j_patrick_campbell@nps.gov

Tammy Stidham
Associate Regional Director
Lands & Planning
tammy_stidham@nps.gov

Figure 1. Action Area of approximately 14 acres for the Triumphal Arch at Memorial Circle Construction project with staging area, George Washington Memorial Parkway, NPS.

https:// www.google.com/maps/@38.884468850000005,-77.05957937243342,14z



Please see my Shared Calendar for specific availability.

From: McDonald, David (Dave) <david_mcdonald@fws.gov>
Sent: Wednesday, July 15, 2026 5:47 PM
To: Hoaglund, Jordan W <jordan_hoaglund@nps.gov>
Cc: Lands, Frank W <frank_lands@nps.gov>; Ford, Jerome <jerome_ford@fws.gov>
Subject: Resolution: National Park Service Requests an Expedited MBTA Consultation for Triumphal Arch at Memorial Circle Construction Project--Sensitive Project

Jordan -

Thank you for escalating the need for a response on the Migratory Bird Treaty Act (MBTA) on the Arch. Per Jerome Ford, Assistant Director (SES), Migratory Bird Program

Below is a summary of FWS actions related to NPS' request for consultation:

Technical Assistance Results

- On June 17, 2026, the FWS Migratory Bird Program received a request from the National Park Service (NPS) for expedited consultation under the Migratory Bird Treaty Act (MBTA) regarding potential impacts to migratory birds from construction of the Triumphal Arch at Memorial Circle.
- The MBTA does not establish a formal consultation requirement comparable to Section 7of the Endangered Species Act. Instead, FWS provides technical assistance and recommends measures to avoid or minimize impacts to migratory birds.
- Based on the information provided by the NPS, the project is expected to result in minor, temporary impacts to migratory birds, primarily from construction-related disturbance and nighttime lighting during migration. The NPS has committed to implementing avoidance and minimization measures to reduce those impacts, such as limiting activities to previously disturbed areas, conducting any necessary tree removal outside the primary nesting season, using downward-directed and shielded construction lighting, installing warm-color LED lighting after construction, and restoring disturbed areas following construction.
- FWS staff reviewed the information provided by the NPS, supported the proposed measures, and communicated that support to NPS staff on June 25, 2026. No further FWS action is required for migratory birds.

Please accept this email with Jerome Ford (cc'd) as evidence that the FWS review has been completed, and no further FWS action is required for migratory birds. If you require anything further, please let me know.

V/r

Dave

David McDonald
Chief of Staff
U.S. Fish & Wildlife Service
Department of the Interior
david_mcdonald@fws.gov | Office (279) 321-1297

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
Phone: (410) 573-4599 Fax: (410) 266-9127

In Reply Refer To: 06/10/2026 19:41:27 UTC
Project code: 2026-0087688
Project Name: GWMP Triumphal Arch

Federal Nexus: yes
Federal Action Agency (if applicable): National Park Service

Subject: Record of project representative's no effect determination for 'GWMP Triumphal Arch'

Dear Diane Pavek:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on June 10, 2026, for 'GWMP Triumphal Arch' (here forward, Project). This project has been assigned Project Code 2026-0087688 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the **Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey)**, invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

Determination for the Northern Long-Eared Bat and/or Tricolored Bat

Based upon your IPaC submission and a standing analysis, your project has reached the following effect determinations:

Species	Listing Status	Determination
Northern Long-Eared Bat (*Myotis septentrionalis*)	Endangered	No effect

Tricolored bat (*Perimyotis subflavus*)	Proposed Endangered	No effect

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Monarch butterfly *Danaus plexippus* Proposed Threatened

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the species covered by this key. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions

occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the Chesapeake Bay Ecological Services Field Office and reference Project Code 2026-0087688 associated with this Project.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

GWMP Triumphal Arch

2. Description

The following description was provided for the project 'GWMP Triumphal Arch':

> The proposed Triumphal Arch will be located within the Memorial Circle of the George Washington Memorial Parkway at the western end of the Arlington Memorial Bridge, connecting to Memorial Avenue and the entrance to the Arlington National Cemetery. The total size of the project, including staging and access, is roughly 14 acres. The project is anticipated to begin at the end of Summer 2026 and will be completed within the next two to three years.
>
> The action area is the 1.5 acres of turf grass within the Memorial Circle and includes the approximately 12.5 acres of turf grass between the north and south lanes of Washington Boulevard, District of Columbia, as the staging area.
>
> The proposed 165-foot-tall Triumphal Arch sits atop a 25-foot pedestal and is topped by a 60-foot statue.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@38.884468850000005,-77.05957937243342,14z



DETERMINATION KEY RESULT

Based on the information you provided, you have determined that the Proposed Action will have no effect on the species covered by this determination key. Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for those species.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

   Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

   No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

   No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

   Yes

6. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

   No

7. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

   Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

   Yes

8. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

   No

9. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

   No

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

    Automatically answered

    No

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

    No

12. Is the action located in New England (CT, MA, ME, NH, RI, or VT)?

    No

13. Will the action cause effects to a bridge?

    Note: Covered bridges should be considered as bridges in this question.

    No

14. Will the action result in effects to a culvert or tunnel at any time of year?

    No

15. Are trees present within 1000 feet of the action area? **Note:** If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

16. Does the action area intersect the northern long-eared bat species list area?

    Automatically answered
    Yes

17. [Semantic] Is the action area located within 0.5 miles of radius of an entrance/opening to any known NLEB hibernacula or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

18. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

19. [Semantic] Is the action area located within 150 feet of a documented northern long-eared bat roost site?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.Have you contacted the appropriate agency to determine if your action is within 150 feet of any documented northern long-eared bat roosts?

    Note: A document with links to Natural Heritage Inventory databases and other state-specific sources of information on the locations of northern long-eared bat roosts is available here. Location information for northern long-eared bat roosts is generally kept in state natural heritage inventory databases – the availability of this data varies by state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited.

    Automatically answered
    No

20. Does the action area intersect the tricolored bat species list area?

    Automatically answered
    Yes

21. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

    Automatically answered
    No

22. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

23. Do you have any documents that you want to include with this submission?

    No

PROJECT QUESTIONNAIRE

IPAC USER CONTACT INFORMATION

Agency: National Park Service
Name: Diane Pavek
Address: 4598 MacArthur Blvd, NW
City: Washington
State: DC
Zip: 20007
Email dpavek@nps.gov
Phone: 2023398309

APPENDIX G

CONSULTATION WITH THE COMMISSION ON FINE ARTS

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

23 April 2026

Dear Secretary Burgum:

In its meeting of 16 April, the Commission of Fine Arts reviewed a concept design submission for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission expressed appreciation for your comments in introducing the proposal at the meeting and approved the submission with the following comments.

The Commission members commented that a proposed monumental arch—a feature characteristic of many national capital cities—would contribute positively to the honorific landscape of Washington, D.C., for many generations. Citing the history of monumental planning for the city to include a large marker in Memorial Circle, they expressed support for the location on this important axis between the Lincoln Memorial and Arlington National Cemetery, and they endorsed the 166-foot height of the arch itself as appropriate for this setting. However, they noted that the great scale and solidity of the proposed structure, while framing axial views between the memorials, may block oblique views within this monumental setting. They therefore recommended creating secondary open archways within the legs of the central arch in order to make it more open; they also suggested creating a more appropriately grand entry sequence into the interior public spaces of the arch.

For the 84-foot-high monumental grouping of a gilded, winged allegorical figure and flanking eagles on a stepped base proposed for the top of the arch, the Commission members suggested removing these from the design, observing that the project would appear more compatible with Washington's monumental context without these elements. Regarding the proposed program of sculpture generally, the Commission members requested more information on the various artworks intended for the project, including those for the arched niches, panels, friezes, keystones, and other areas of the arch. They discouraged the inclusion of lions at the base of the arch, which they noted are not native to the United States, but they encouraged substituting native North American examples of heroic, mighty creatures such animals as bison, horses, or grizzly bears. They also suggested removing the wingless bust of an eagle at the keystone of the central arch.

Regarding the treatment of the site, the Commission members acknowledged the difficulty of providing pedestrian access to the arch, which is proposed to be located within a traffic circle. Rather than constructing a tunnel hundreds of feet long to provide this pedestrian access, they recommended adding a surface crosswalk on the western side of the traffic circle, which would allow a symmetrical composition for the ramps that lead from the street level to the elevated plinth at the base of the arch. They also recommended refining the relationship of the site to the traffic circle itself,

extending the landscape design outward to the greatest extent possible, as well as limiting the use of asphalt pavement to the minimum required for traffic and using a different material, such as stone cobbles, for the restricted areas of the circle instead of applied graphic striping as presented.

In its action of concept approval, the Commission requested that the project be reviewed next as a revised concept submission that responds to these comments. The submission should include: more detailed information should be provided about the intended program of sculptures; an extension of the site model to illustrate the axis of the National Mall eastward from the Lincoln Memorial; the illustration of views to the arch from Arlington House, the Hemicycle, and the Lincoln Memorial; and documentation of the absolute heights of the major monuments within this symbolic landscape as measured from sea level.

The Commission of Fine Arts looks forward to the continued review of this substantial addition to the monumental composition of the national capital. Please coordinate the next submission with the staff which, as always, is available to assist you.

Sincerely,

Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Robin Rode, Les Métalliers Champenois
Josh Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

28 May 2026

Dear Secretary Burgum:

In its meeting of 21 May, the Commission of Fine Arts reviewed a revised concept design proposal for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission approved the submission as a final proposal for the architectural design with the following comments, requesting further information about the arch's program of sculpture.

The Commission members expressed appreciation for the presentation, which included additional information about the structure's interior, a more extensive site model, rendered views of the proposed arch within the larger monumental context, and the simplification of various decorative features. They cited the history of heroic architecture proposed for this site in the late nineteenth and early twentieth centuries, including several arches and a pair of 166-foot-tall columns; they commented that this proposal builds on the legacy of the McMillan Plan for Washington, D.C., and would extend the symbolic landscape beyond the National Mall. They noted that the city and its narrative of monuments is not static, and this project provides an opportunity for new national stories. In their discussion, the Commission members noted the numerous objections to the project and advised that many of these issues are not part of the Commission's purview. Instead, they characterized the project as beautiful, and they found that the presentation shows the arch would be visually open and would not block views toward the significant landmarks in this context. They concluded that the arch is appropriately scaled to frame and enhance Arlington House as the landmark that terminates the long ceremonial axis from the Lincoln Memorial, and that it would give the historic home of General Robert E. Lee the visual prominence it deserves as the endpoint of the monumental McMillan Plan sequence extending from the Capitol to Arlington National Cemetery.

In their support for the architectural design of the arch as presented, the Commission members resolved to approve this revised concept submission as a final design, with the exception of the sculpture, bas-relief panels, and statuary in the arched niches, which should be submitted when these elements have been designed. Noting the spare character of arch's inner surfaces, they also suggested adding articulation, such as panels, surface relief, or inscriptions to complete the development of the design.

With this action of final approval, the Commission has concluded its review of the architectural components of this project and looks forward to the review of the comprehensive sculptural program.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Joshua Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

APPENDIX H

CONSULTATION WITH THE NATIONAL CAPITAL PLANNING COMMISSION

Executive Director's Recommendation

Commission Meeting: June 4, 2026

PROJECT
New Monumental Arch
George Washington Memorial Parkway
Memorial Avenue
Washington, DC

SUBMITTED BY
United States Department of the Interior

REVIEW AUTHORITY
Federal Projects in the District
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
8778

NCPC MAP FILE NUMBER
1.45(73.10)46209

APPLICANT'S REQUEST
Approval of comments on concept plans

PROPOSED ACTION
Approve comments on concept plans

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The U.S. Department of the Interior (the "applicant") has submitted concept plans for a new monumental arch to be located in Memorial Circle for Commission comment. The applicant proposes an arch topped with gilded, winged statuary. The overall height from the base to the top of the statuary is 250 feet.

Memorial Circle is located on Columbia Island, which is within the boundary channel of Washington, DC. Construction of the circle began in 1940. It sits at the west terminus of Arlington Memorial Bridge, which was designed by the architectural firm McKim, Mead, & White and opened in 1932. In 2018, the Commission approved rehabilitation of the bridge, which was completed in 2023.

The concept submission provides the Commission with an early opportunity to provide comments to the applicant, both to help guide the project's planning and development, and to also request additional information the Commission will need for future project review.

KEY INFORMATION

- Arlington Memorial Bridge (Memorial Bridge) spans the Potomac River and provides a connection between the Lincoln Memorial on the east and Arlington National Cemetery on the west via Memorial Circle and Memorial Avenue. The bridge, including Memorial Circle, was designed to create a physical and symbolic connection between the North and South.
- Prior to construction, the design of Memorial Circle went through multiple design iterations that began as a formal space with decorative pillars on either side of the axial view to the current design of a traffic circle within oval loops connecting it to area roadways.

- Memorial Bridge was restored between 2019-2023 to address structural, aesthetic and functional issues. Memorial Circle was not included in this restoration.
- In 1980 the bridge, including Memorial Circle, was listed on the National Register of Historic Places for its architectural characteristics and innovative engineering.
- The sight line, design, and landscape features of Memorial Avenue, which includes Memorial Circle, are contributing elements of the National Register-listed Arlington National Cemetery Historic District and Arlington Memorial Bridge.
- The Memorial Circle is administered and maintained by the George Washington Memorial Parkway, a unit of the National Park Service (NPS).
- The proposed project includes a 166-foot-tall arch structure topped with three gilded winged figures which extend to an overall height of 250 feet.
- Access to the arch is proposed by the applicant at ground level using new pedestrian refuge island areas, crosswalks, and traffic signals.
- The U.S. Commission of Fine Arts approved the concept plan for the proposed arch with comments at the April 16, 2026 meeting. The final design was approved at their May 21, 2026 meeting.

RECOMMENDATION

The Commission:

Approves the following concept comments on the proposed monumental arch located in Memorial Circle, on Columbia Island in Washington, DC.

Notes at the concept review stage, the Commission provides comments and requests additional information from the applicant that will inform the preliminary and final reviews by the Commission.

Notes that according to the applicant, the purpose of the arch is to celebrate the triumphs of the American people, inspire patriotism and love of country, and beautify our nation's capital.

Vehicular and Pedestrian Accessibility

Notes that Memorial Circle is an integral part of the vehicular access between the Arlington Memorial Bridge and the George Washington Memorial Parkway, Washington Boulevard, and Memorial Avenue with significant vehicular traffic, especially on the eastern side of the circle.

Notes that visitors cannot currently access the center of Memorial Circle, and the applicant proposes to alter the east triangular island and provide crosswalks on the east and west sides of the circle. However, the plans do not provide details regarding visitor parking, loading/unloading, and Americans with Disabilities Act (ADA) access.

Notes the project introduces a visitor attraction to Memorial Circle, and as such, additional information is necessary to ensure the safety of those accessing the site and minimizing impacts to vehicular travel around the site; and therefore,

Requests the applicant submit for the next review:

- A transportation or traffic study that identifies any potential impacts of the proposed project on the road network and level of service, and evaluates the proposed pedestrian access to ensure that visitors can avoid pedestrian and vehicular conflicts; and
- Information regarding parking and loading/unloading for visitors to the arch to ensure safe access for those of all abilities and minimize disruption to the traffic network.

Visitor Safety

Notes the arch sits within an at-grade plaza surrounded by a seat wall and openings with bollards for pedestrian access aligned with the openings of the arch.

Supports the use of the seat wall as a designed security feature around the arch plaza.

Requests the applicant provide, as part of the next review, a risk assessment and evaluation of the project to ensure that the proposed design will address security considerations.

Aviation Safety

Notes the applicant is currently working with the Federal Aviation Administration (FAA) to evaluate whether the proposed project would impact air navigation given its proximity to Ronald Reagan Washington National Airport.

Recommends the applicant continue consultation with the FAA to evaluate potential impacts of the proposed project on air navigation and provide an update to the Commission as part of the next review.

Advises that any design recommendations provided by the FAA should be incorporated into the proposed project prior to the Commission's final action.

Viewsheds

Notes the sight line, design, and landscape features of Memorial Avenue, which includes Memorial Circle, are contributing elements of the National Register-listed Arlington National Cemetery Historic District and Arlington Memorial Bridge.

Notes the panoramic views from Arlington House at Arlington National Cemetery to the west, and the Lincoln Memorial to the east, have been in place since the 1920s and reflect the visual connectivity characteristic of the McMillan Plan, as noted in the National Register of Historic Places registration form for Arlington National Cemetery.

Notes that, according to the submission materials, the view of the Lincoln Memorial from Arlington House will be blocked by the proposed arch, and views from the Lincoln Memorial to the Arlington House will be altered.

Encourages the applicant to provide, as part of the Section 106 process of the National Historic Preservation Act, any design options that were explored to avoid or minimize impacts on the visual connection between Arlington House and the Lincoln Memorial.

Requests the applicant provide, as part of the next review, updated photo-visualizations (renderings) of existing and proposed pedestrian-level views from the additional locations noted below:

- View from north steps of the Jefferson Memorial looking toward the Lincoln Memorial; and
- Views from the George Washington Memorial Parkway, one looking south toward the circle from a point immediately south of I-66, and one looking north toward the circle from a point near the LBJ Memorial Grove.

Project Design and Materials

Notes that NCPC has consistently taken the position that the Height of Buildings Act applies to all habitable structures in the District of Columbia, including federal projects, which is consistent with Comprehensive Plan Policy UD.B.1.3, highlighting the focus on preserving Washington's picturesque, horizontal character, and reinforcing the Height of Buildings Act.

Requests the applicant provide, as part of the next submission, an analysis and justification for the project's height in light of the Height of Buildings Act.

Notes that the submission does not include information on the site and building materials, the proposed lighting, or the stormwater management compliance.

Requests the applicant provide, as part of the next submission, information regarding the following information:

- The proposed arch and site materials palette, including cladding, paving, pedestrian features, and security elements.
- The proposed lighting strategy, including nighttime renderings from key views demonstrating the lighting concept in context.
- The proposed stormwater management strategy.

Project Coordination and Next Steps

Recommends the applicant work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate regarding any proposed changes or impacts to the surface transportation network.

Recommends the applicant work with the District Department of Energy & Environment regarding the proposed stormwater management approach.

Recommends the applicant work with the District of Columbia State Historic Preservation Office and other consulting parties regarding the National Historic Preservation Act Section 106 process.

Requests the applicant provide, as part of the next submission, updates on the Section 106 process and the National Environmental Policy Act (NEPA) evaluation process, as completion of both processes are required for NCPC final action.

PROJECT REVIEW TIMELINE

Previous actions	**None.**
Remaining actions (anticipated)	– Review of preliminary and final site and building plans

PROJECT ANALYSIS

Executive Summary

The U.S. Department of the Interior has submitted concept plans for a new monumental arch in Memorial Circle, located on Columbia Island in Washington, DC. Per the submission, the proposed arch is 250 feet in height and consists of an arch structure which is 166 feet in height, topped with gilded winged statuary. The arch sits within a plaza that consists of granite pavers and is surrounded by a seat wall with bollards aligning with the openings of the arch. The arch submission details the interior space that includes elevators, stairs, ticketing and security, back of house space, restrooms, programming space, and an observation deck below the statuary. The proposed plan includes changes to Memorial Circle with new pedestrian refuge island areas, new pedestrian crosswalks, and traffic signals. At the concept review stage, the Commission provides comments and requests additional information from the applicant that will inform subsequent Commission review. As such, staff recommends the **Commission approve the following concept comments on the proposed monumental arch located in Memorial Circle, on Columbia Island in Washington, DC.**

Overview

History and Background of Site

The need for a bridge connecting the northern and southern shores of the Potomac River in the area of the Arlington Memorial Bridge was documented as early as the mid-1800s. According to the Cultural Landscape Report (CLR) published by the National Park Service in 2024, the Memorial Avenue Corridor was designed as a symbolic and physical link between the Lincoln Memorial, a tribute to the 16th American President; the entrance to Arlington National Cemetery;

and Arlington House, the former plantation home of Confederate General Robert E. Lee. The concept for a memorial bridge and avenue first emerged after the Civil War and gained momentum when it was included within the McMillan Plan, which proposed improvements to the Washington, DC park system. The design of the corridor took shape amidst the City Beautiful Movement, which promoted formal and classical treatments for architectural, engineering, sculptural, and landscape features—all of which were incorporated into the evolving designs for the Arlington Memorial Bridge and the Memorial Avenue Corridor. Architect William Mitchell Kendall, of renowned firm McKim, Mead & White, was responsible for the corridor's overall design. The corridor was built in phases: Arlington Memorial Bridge was constructed between 1926 and 1932; the Boundary Channel Bridge was built between 1929 and 1930; Memorial Circle was constructed on Columbia Island beginning in 1940; and Memorial Avenue was built beginning in 1930. Memorial Circle was designed as part of the western terminus of the Arlington Memorial Bridge as a means to connect to the George Washington Memorial Parkway, Arlington Boulevard, and Memorial Avenue.

According to the CLR, early designs for the area on Columbia Island that would become Memorial Circle included the bridge roadway meeting at an ellipse plaza where the cross arms would extend north and south from the ellipse. This elliptical plaza design also featured two columns, each 166 feet in height, each topped with a sculpture, intended to represent the post-Civil War reunion of the North and South, on either side of the Memorial Avenue roadway viewshed. The north and south arms of the ellipse plaza ended in small traffic circles, each with a circular Greek temple in the center. The designs for this area changed significantly before construction began on the single large traffic circle known today as Memorial Circle. The Circle has had other minor modifications over the years including reducing the travel lanes around the Circle to one, changing the paving materials, modifications to connecting roadways, and changes to pedestrian access and roadway efficiency as recently as 2020.

Project Description

According to the applicant, the purpose of the arch is to celebrate the triumphs of the American people, inspire patriotism and love of country, and beautify our nation's capital. The proposed arch consists of an arch structure with two legs at a height of 166 feet. The arch sites within a plaza that includes granite pavers encircled by a seat wall and two pedestrian access points lined with bollards. The two access points face east and west, aligned with the opening of the arch. The circle is shown with new pedestrian crosswalks connecting visitors via pedestrian refuge islands next to the traffic circle.

The exterior of the proposed arch will be primarily clad in stone. The vertical faces of the arch include several recessed or framed spaces that would typically house statuary or relief sculpture, though no specific details on the future use of these spaces has yet been identified. The top area of the arch structure that includes the mezzanine, below the observation deck and statuary plinth, includes gilded lettering quoting the American Pledge of Allegiance on both east and west facing sides. Above the primary arch structure and mezzanine is a recessed area housing the observation deck interior space and, above that, the proposed statuary. The proposed statues include a 60-foot-tall central gilded, winged Lady Liberty flanked by a gilded flying eagle on each side. All the

statuary is facing east toward the Lincoln Memorial. There are also additional gold decorative elements on the underside of the arch and on each vertical face.

The proposed interior of the arch at the ground floor level includes ticketing and security, back of house space, stairwells, and elevators in the south leg, with an exit hall, back of house space, stairwells, and elevators in the north leg. The submission plans include a stair hall, restrooms, program spaces, and stair and elevator lobbies that connect up from the legs in the mezzanine. The stair hall includes two additional staircases and an elevator in the center to provide access to the observation deck above.

Vehicular and Pedestrian Accessibility

Memorial Circle safety improvements completed in 2006 and 2007 reduced the number of lanes around the traffic rotary. Along the north and south sides of Memorial Circle, the outermost travel lanes were replaced with concrete shoulder lanes. The concrete lanes were converted to Belgian block several years later during rehabilitation work completed in 2020. After years of vehicular and pedestrian collisions, NPS in 2020 implemented safety measures to Memorial Circle that included higher visibility crosswalks, new signage and rapid flashing beacons, clearer lane markings, lane reductions, and repaved surfaces. A segment of road on the north side of Memorial Circle that connected South Arlington Boulevard and South Washington Boulevard was closed to vehicular traffic. These changes did restrict pedestrian access around the circle and currently visitors cannot cross Memorial Avenue on the east side of the circle or access the center of Memorial Circle.

The arch is intended to be a visitor destination and includes an observation deck. Memorial Circle is an integral part of the vehicular access between the Arlington Memorial Bridge and the George Washington Memorial Parkway, Washington Boulevard, and Memorial Avenue with significant traffic volume, especially on the eastern side of the circle. As such, it will be important to ensure the continued safe operation of the traffic network, as well as the safe passage of visitors.

The plans include new pedestrian crosswalks from the west at Memorial Avenue which meet as a traffic refuge, before proceeding across the Circle into the arch plaza. From the east, two new crosswalks will start at the landing of the Memorial Bridge, also merging into a traffic island before crossing the Circle into the arch plaza. The applicant has stated that signals will be used to control vehicular traffic and allow pedestrians to use the various crosswalks.

The applicant has indicated that it is working with several agencies to evaluate the transportation network to accommodate visitor access and minimize impacts to the road network. As such staff suggests the **Commission recommend the applicant work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate regarding any proposed changes or impacts to the surface transportation network.**

The plans do not provide details regarding visitor parking, loading/unloading, and ADA access. As the project introduces a visitor attraction to Memorial Circle, additional information is

necessary to ensure the safety of those accessing the site and the minimizing impact to vehicular travel around the site. As such, staff recommends the **Commission request the applicant submit for the next review:**

- **A transportation or traffic study that identifies any potential impacts of the proposed project on the road network and level of service, and evaluates the proposed pedestrian access to ensure visitors can avoid pedestrian and vehicular conflicts; and**
- **Information regarding parking and loading/unloading for visitors to the arch to ensure safe access for those of all abilities and minimize disruption to the traffic network.**

Visitor Safety

The proposed arch sits within an at-grade plaza surrounded by a seat wall with openings with bollards for pedestrian access aligned with the openings of the arch. The submission includes some security elements including the seat wall, bollards, and security in the ticketing space. The seat wall as a security element is consistent with integrated design elements that NCPC policies support. As such, staff recommends the **Commission support the use of the seat wall as a designed security around the arch plaza.** Additional information regarding the overall risk and security approach will be helpful as part of the next review. Therefore, staff recommends the **Commission request the applicant provide, as part of the next review, a risk assessment and evaluation of the project to ensure the proposed design will address security considerations.**

Aviation Safety

The proposed project is shown at a height of 250 feet and the location along the Potomac River is 3,000 feet from Ronald Reagan Washington National Airport, near landing approaches for two runways (01/19 and 15/33). According to Title 14, Chapter I, Subchapter E, Part 77 of the Code of Federal Regulations (C.F.R.) Safe, Efficient Use and Preservation of the Navigable Airspace outlines requirements for any construction that is more than 200 feet above ground level to file notice with the Federal Aviation Administration for determination of whether the proposed construction would be a hazard to air navigation. The applicant indicated they are currently working with the Federal Aviation Administration to evaluate whether the proposed project would impact air navigation given its proximity to Ronald Reagan Washington National Airport. This coordination should continue, and staff suggests the **Commission recommend the applicant continue consultation with the FAA to evaluate potential impacts of the proposed project on air navigation and provide an update to the Commission as part of the next review**. Any recommendations that are identified by the FAA review process should be incorporated into the design prior to the Commission's final action. As such, staff suggests the **Commission advise that any design recommendations provided by the FAA should be incorporated into the proposed project prior to the Commission's final action.**

Viewsheds

The proposed location of the arch is at the center of Memorial Avenue and the sight line, design, and landscape features of Memorial Avenue, which includes Memorial Circle, are contributing elements of the National Register-listed Arlington National Cemetery Historic District and Arlington Memorial Bridge. The panoramic views from Arlington House at Arlington National Cemetery to the west and the Lincoln Memorial to the east have been in place since the 1920s and reflect the visual connectivity characteristic of the McMillan Plan. This alignment from the Lincoln Memorial to Arlington House was originally designed as a memorial symbolizing reunification of the North and South after the Civil War. The bridge and Memorial Avenue serve as the ceremonial entrance to Arlington National Cemetery, the nation's most hallowed ground and the final resting place for more than 400,000 service members, veterans, and family members.

According to the renderings in the submission materials, the proposed arch will block the view of the Lincoln Memorial from Arlington House and alter the view from the Lincoln Memorial to Arlington House. Given the importance of this view, staff suggests the **Commission encourage the applicant provide, as part of the Section 106 process of the National Historic Preservation Act, any design options that were explored to avoid or minimize impacts on the visual connection between Arlington House and the Lincoln Memorial.** In addition, staff suggests the **Commission request the applicant provide, as part of the next review, updated photo-visualizations (renderings) of existing and proposed pedestrian-level views from the additional locations noted below:**

- **View from the north steps of the Jefferson Memorial looking toward the Lincoln Memorial; and**
- **Views from the George Washington Memorial Parkway, one looking south toward the circle from a point immediately south of I-66, and one looking north toward the circle from a point near the LBJ Memorial Grove.**

Design

Consistent with Comprehensive Plan Policy UD.B.1.3, the Commission has historically focused on preserving Washington's picturesque, horizontal character, and reinforcing the Height of Buildings Act. The Height of Buildings Act of 1910 (amended 2014) is a federal law that limits building height, and NCPC has always applied the Height of Buildings Act to federal projects. The project appears to include a combination of habitable space and architectural embellishments. As such, further information will be necessary to understand how the project comports with the Height of Buildings Act. As such, staff suggests the **Commission request the applicant provide, as part of the next submission, an analysis and justification for the project's height in light of the Height of Buildings Act.**

Finally, the submission does not yet include information on any proposed lighting, the stormwater management approach, and most of the site and building materials. These are necessary elements for the Commission to review as the design advances. Therefore, staff suggests the **Commission recommends that the applicant work with the District Department of Energy &**

Environment regarding the proposed stormwater management approach and **requests the applicant provide, as part of the next submission, information regarding the following information:**

- **The proposed arch and site materials palette, including cladding, paving, pedestrian features, and security elements.**
- **The proposed lighting strategy, including nighttime renderings from key views demonstrating the lighting concept in context.**
- **The proposed stormwater management strategy.**

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

Staff reviewed the project considering the policies set forth in the *Comprehensive Plan for the National Capital,* particularly those found in the Historic Preservation, Transportation, Visitors & Commemoration, Parks & Open Space, and Urban Design Elements. As a reminder, the Commission takes a holistic approach when applying the Comprehensive Plan policies within the context of the project's needs and objectives when making a consistency determination. Staff will fully analyze the proposed project in accordance with NCPC's policies once it receives the requested information.

National Historic Preservation Act

NCPC has an independent responsibility to comply with the National Historic Preservation Act (NHPA) process. NCPC intends to designate the applicant as the lead federal agency for the purposes of compliance with the Section 106 process of the NHPA. NCPC will not take a final review action until the Section 106 process has been completed. Further, staff suggests the **Commission recommend that the applicant work with the District of Columbia State Historic Preservation Office and other consulting parties regarding the National Historic Preservation Act Section 106 process**.

National Environmental Policy Act

NCPC has a responsibility to comply with the National Environmental Policy Act (NEPA) based on its approval role for federal projects within the District of Columbia. The applicant has indicated an Environmental Assessment (EA) will be prepared for the project. NCPC will not take a final review action until the NEPA process has been completed.

Updates on both NHPA and NEPA compliance will be helpful as part of the next review. Therefore, staff recommends the **Commission request that the applicant provide, as part of the next submission, updates on the Section 106 process and the NEPA evaluation process, as completion of both processes are required for NCPC final action.**

CONSULTATION

Coordinating Committee

The Committee forwarded the proposed comments on concept plans to the Commission with the statement that the proposal was coordinated with some, but not all, participating agencies at its May 13, 2026 meeting. The District of Columbia State Historic Preservation Officer (DCSHPO) is not coordinated and noted that the NHPA, Section 106 process had not yet been initiated. They highlighted the adverse visual effects on the east-west axis of the National Mall, as well as the corridor between the Arlington National Cemetery and Lincoln Memorial. The District Department of Energy and Environment (DOEE) stated coordination is still needed. They recommended the applicant contact DOEE to schedule a preliminary design review meeting (PDRM) as the work will trigger stormwater management requirements. The U.S. Commission of Fine Arts (CFA) staff noted their Commission had previously reviewed concept plans for the project and will review a revised concept at their May meeting. Participating agencies included NCPC, the U.S. General Services Administration, NPS, CFA, the DCSHPO, the District of Columbia Office of Planning, the District Departments of Transportation and Energy & the Environment, and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts, at their April 16, 2026 meeting, approved the concept plans for the monumental arch with comments for the applicant to consider. At their May 21, 2026 meeting, the Commission approved the final design.

ONLINE REFERENCE

The following supporting documents for this project are available online at www.ncpc.gov:

- Submission Package

Prepared by NCPC Staff
05/29/2026

POWERPOINT (ATTACHED)

National Capital Planning Commission

New Monumental Arch

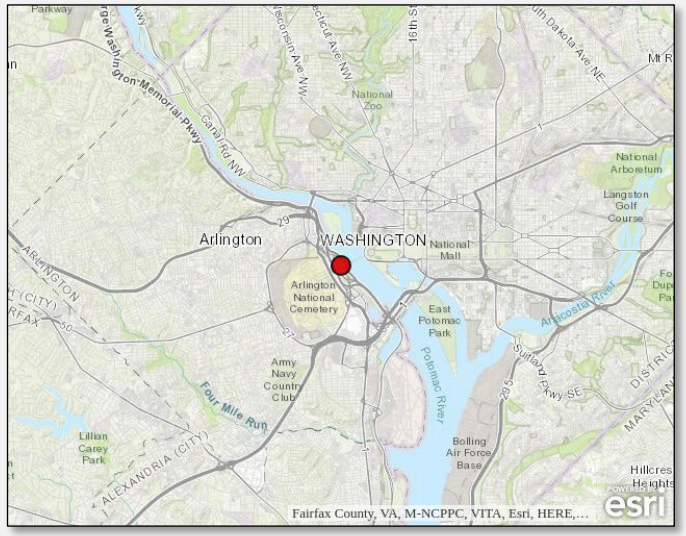
Memorial Avenue, Washington, DC

Approval of Comments on Concept Plans

United States Department of the Interior

June 4, 2026 | File: 8778

Site Location



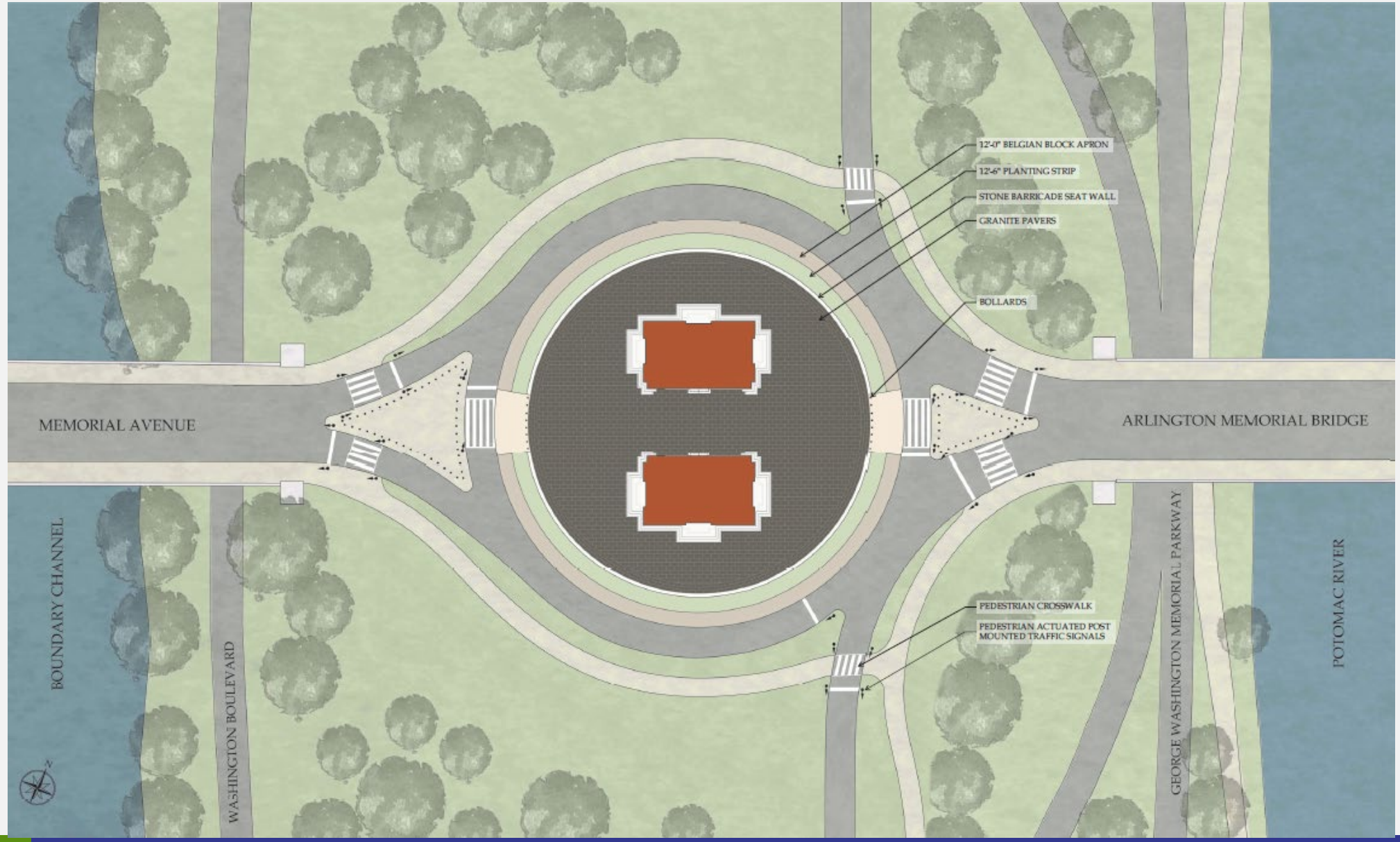


Location Map

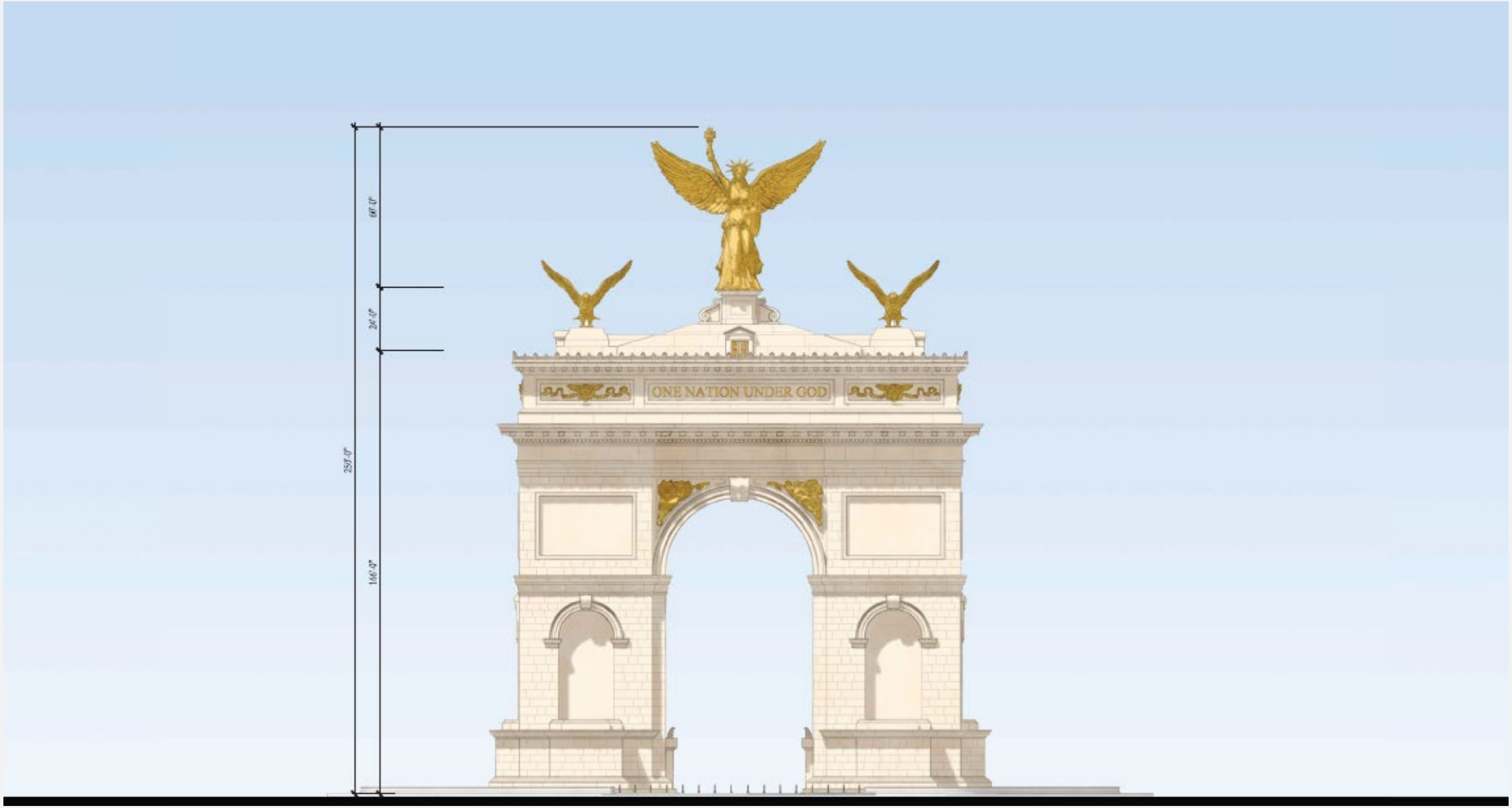
Monumental Arch: Ceremonial Axis Site Plan



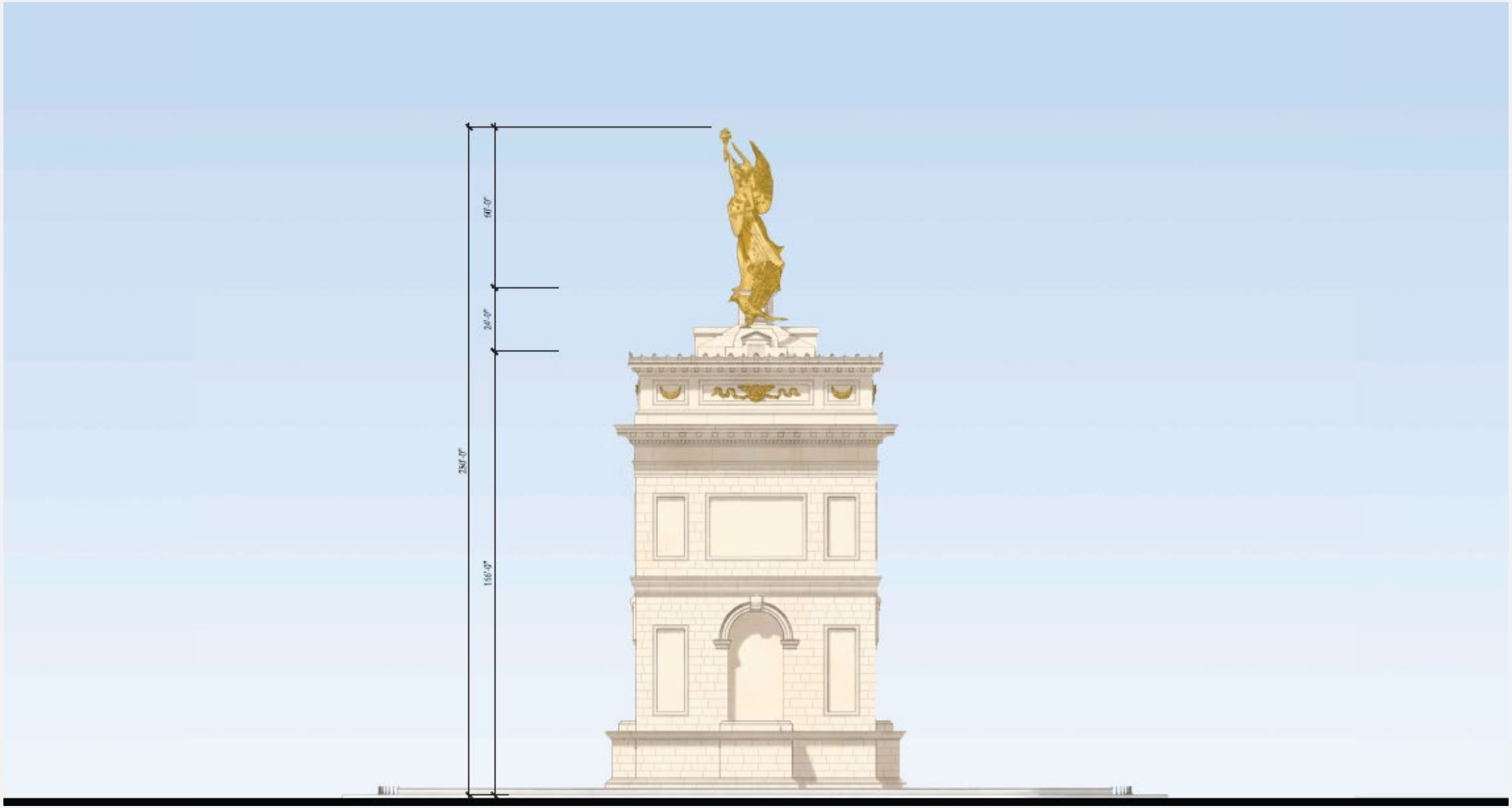
Monumental Arch: Enlarged Site Plan



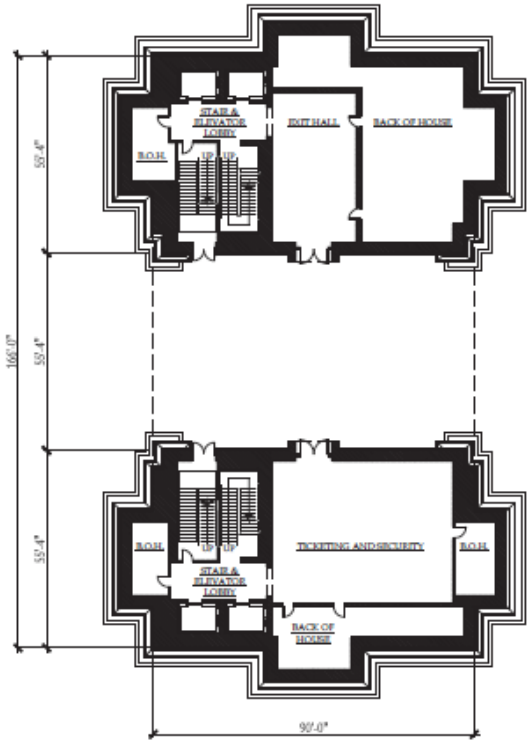
Monumental Arch: Front Elevation



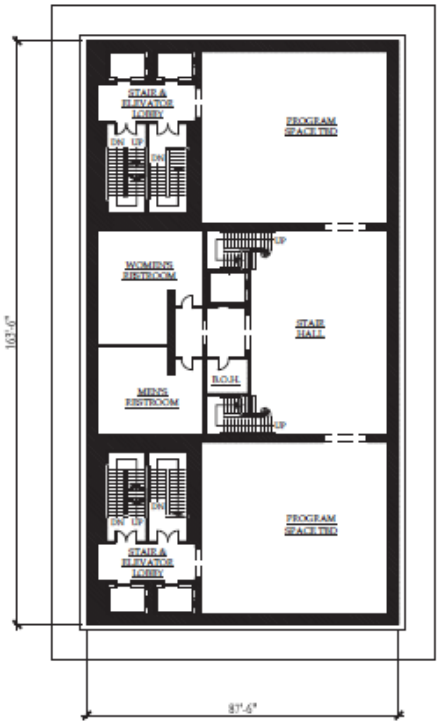
Monumental Arch: Side Elevation



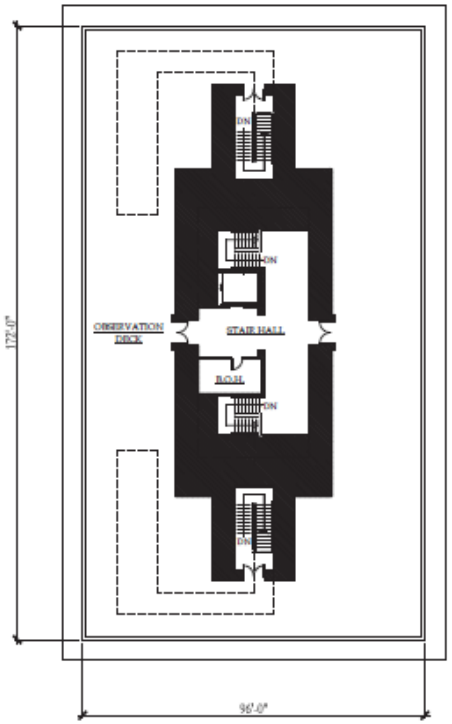
Monumental Arch: Floor Plans



1. GROUND FLOOR LEVEL

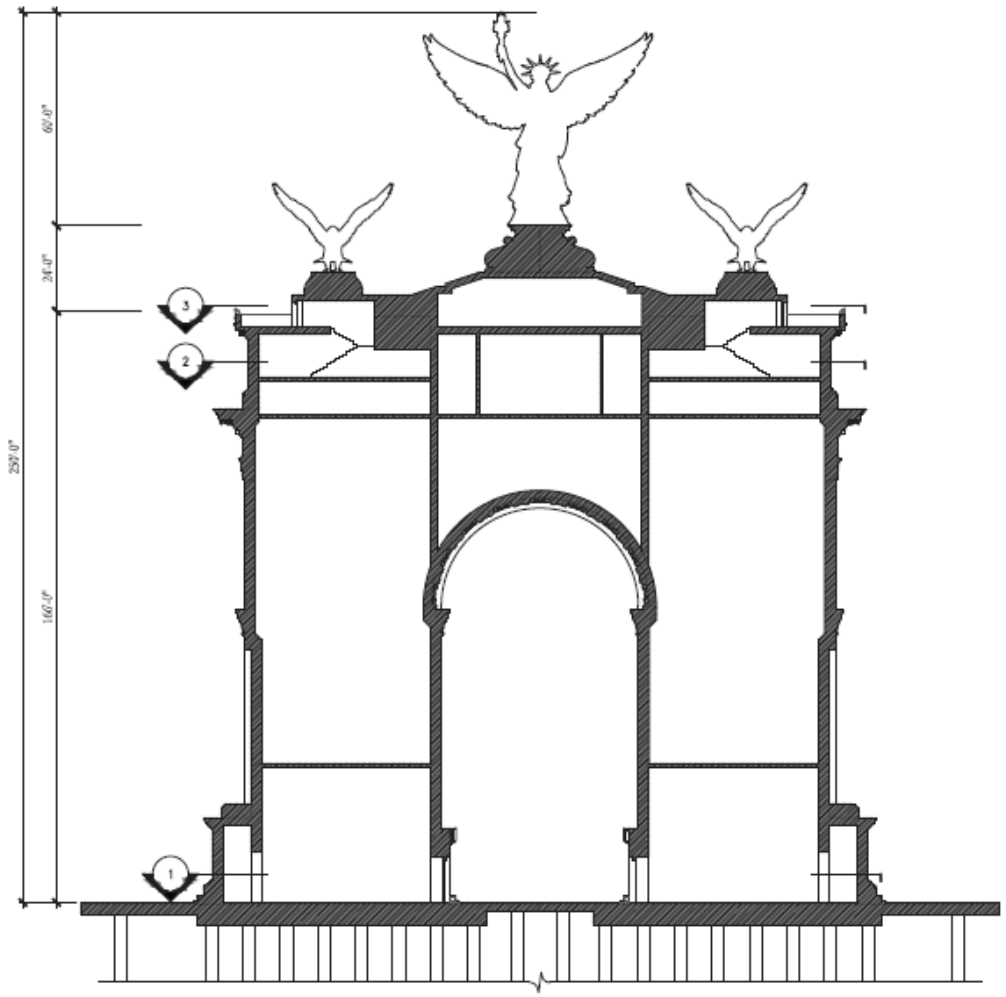


2. MEZZANINE LEVEL

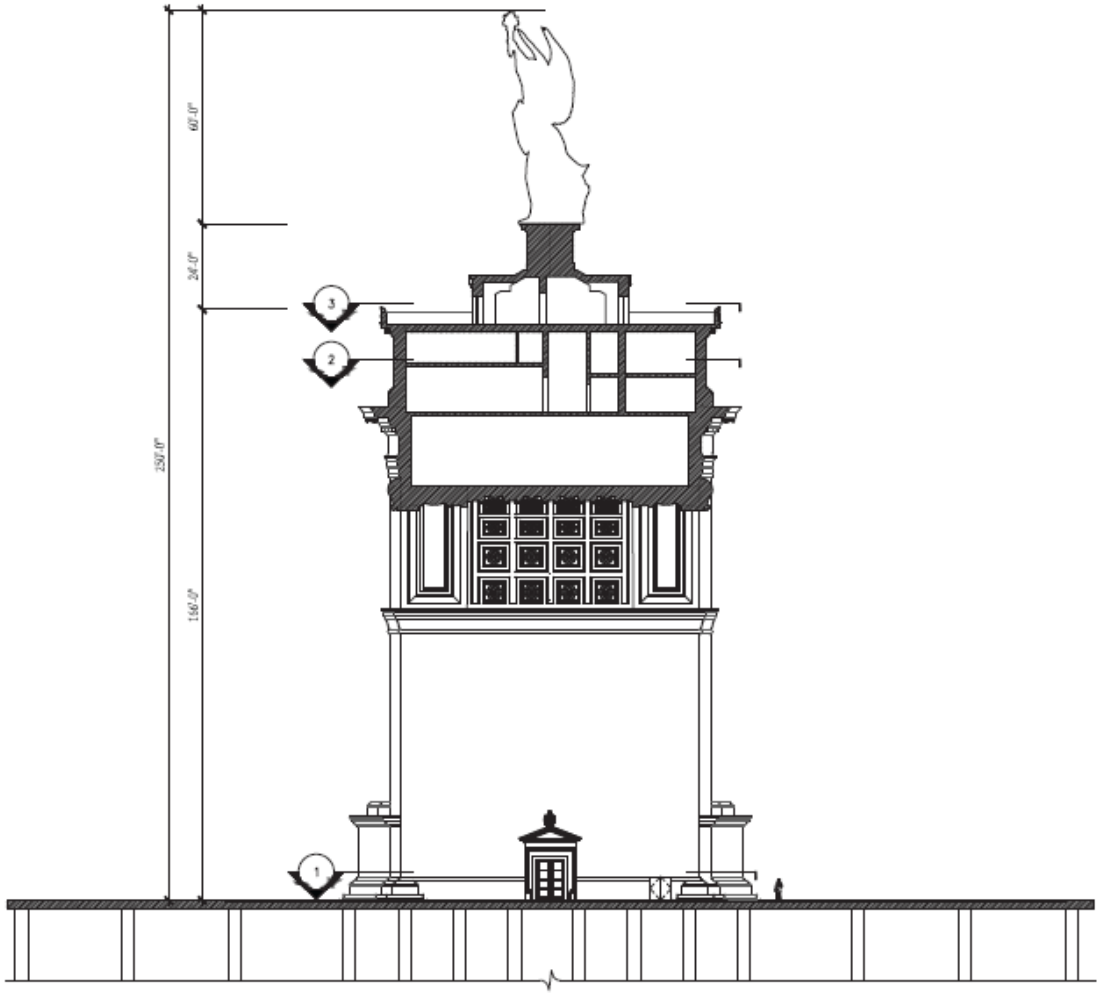


3. OBSERVATION DECK

Monumental Arch: Longitudinal Section



Monumental Arch: Transverse Section



Monumental Arch: Rendering



Rendering: street level view of proposed Arch looking west

Monumental Arch: Rendering



Rendering: street level view of proposed Arch looking southwest

Monumental Arch: Views



View from Arlington House - Before

Monumental Arch: Views



View from Arlington House - After

Monumental Arch: Views



View from
Parkway Drive NW
- Before

Monumental Arch: Views



View from
Parkway Drive NW
- After

Monumental Arch: Views



View from Lincoln Memorial Circle- Before

Monumental Arch: Views



View from Lincoln Memorial Circle- Before

Monumental Arch: Views



View from Lincoln Memorial

Monumental Arch: Views



View from Lincoln Memorial - Before

Monumental Arch: Views



View from Lincoln Memorial - After

Monumental Arch: Views



View from Washington Monument - Before

Monumental Arch: Views



View from Washington Monument - After

Monumental Arch: Views



View from Washington Monument - Before

Monumental Arch: Views



View from Washington Monument - After

Monumental Arch: Views



View from Capitol Hill - Before

Monumental Arch: Views



View from Capitol Hill – After

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

23 April 2026

Dear Secretary Burgum:

In its meeting of 16 April, the Commission of Fine Arts reviewed a concept design submission for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission expressed appreciation for your comments in introducing the proposal at the meeting and approved the submission with the following comments.

The Commission members commented that a proposed monumental arch—a feature characteristic of many national capital cities—would contribute positively to the honorific landscape of Washington, D.C., for many generations. Citing the history of monumental planning for the city to include a large marker in Memorial Circle, they expressed support for the location on this important axis between the Lincoln Memorial and Arlington National Cemetery, and they endorsed the 166-foot height of the arch itself as appropriate for this setting. However, they noted that the great scale and solidity of the proposed structure, while framing axial views between the memorials, may block oblique views within this monumental setting. They therefore recommended creating secondary open archways within the legs of the central arch in order to make it more open; they also suggested creating a more appropriately grand entry sequence into the interior public spaces of the arch.

For the 84-foot-high monumental grouping of a gilded, winged allegorical figure and flanking eagles on a stepped base proposed for the top of the arch, the Commission members suggested removing these from the design, observing that the project would appear more compatible with Washington's monumental context without these elements. Regarding the proposed program of sculpture generally, the Commission members requested more information on the various artworks intended for the project, including those for the arched niches, panels, friezes, keystones, and other areas of the arch. They discouraged the inclusion of lions at the base of the arch, which they noted are not native to the United States, but they encouraged substituting native North American examples of heroic, mighty creatures such animals as bison, horses, or grizzly bears. They also suggested removing the wingless bust of an eagle at the keystone of the central arch.

Regarding the treatment of the site, the Commission members acknowledged the difficulty of providing pedestrian access to the arch, which is proposed to be located within a traffic circle. Rather than constructing a tunnel hundreds of feet long to provide this pedestrian access, they recommended adding a surface crosswalk on the western side of the traffic circle, which would allow a symmetrical composition for the ramps that lead from the street level to the elevated plinth at the base of the arch. They also recommended refining the relationship of the site to the traffic circle itself,

extending the landscape design outward to the greatest extent possible, as well as limiting the use of asphalt pavement to the minimum required for traffic and using a different material, such as stone cobbles, for the restricted areas of the circle instead of applied graphic striping as presented.

In its action of concept approval, the Commission requested that the project be reviewed next as a revised concept submission that responds to these comments. The submission should include: more detailed information should be provided about the intended program of sculptures; an extension of the site model to illustrate the axis of the National Mall eastward from the Lincoln Memorial; the illustration of views to the arch from Arlington House, the Hemicycle, and the Lincoln Memorial; and documentation of the absolute heights of the major monuments within this symbolic landscape as measured from sea level.

The Commission of Fine Arts looks forward to the continued review of this substantial addition to the monumental composition of the national capital. Please coordinate the next submission with the staff which, as always, is available to assist you.

Sincerely,

Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Robin Rode, Les Métalliers Champenois
Josh Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

28 May 2026

Dear Secretary Burgum:

In its meeting of 21 May, the Commission of Fine Arts reviewed a revised concept design proposal for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission approved the submission as a final proposal for the architectural design with the following comments, requesting further information about the arch's program of sculpture.

The Commission members expressed appreciation for the presentation, which included additional information about the structure's interior, a more extensive site model, rendered views of the proposed arch within the larger monumental context, and the simplification of various decorative features. They cited the history of heroic architecture proposed for this site in the late nineteenth and early twentieth centuries, including several arches and a pair of 166-foot-tall columns; they commented that this proposal builds on the legacy of the McMillan Plan for Washington, D.C., and would extend the symbolic landscape beyond the National Mall. They noted that the city and its narrative of monuments is not static, and this project provides an opportunity for new national stories. In their discussion, the Commission members noted the numerous objections to the project and advised that many of these issues are not part of the Commission's purview. Instead, they characterized the project as beautiful, and they found that the presentation shows the arch would be visually open and would not block views toward the significant landmarks in this context. They concluded that the arch is appropriately scaled to frame and enhance Arlington House as the landmark that terminates the long ceremonial axis from the Lincoln Memorial, and that it would give the historic home of General Robert E. Lee the visual prominence it deserves as the endpoint of the monumental McMillan Plan sequence extending from the Capitol to Arlington National Cemetery.

In their support for the architectural design of the arch as presented, the Commission members resolved to approve this revised concept submission as a final design, with the exception of the sculpture, bas-relief panels, and statuary in the arched niches, which should be submitted when these elements have been designed. Noting the spare character of arch's inner surfaces, they also suggested adding articulation, such as panels, surface relief, or inscriptions to complete the development of the design.

With this action of final approval, the Commission has concluded its review of the architectural components of this project and looks forward to the review of the comprehensive sculptural program.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Joshua Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

Commission Action

July 9, 2026

PROJECT
New Monumental Arch
George Washington Memorial Parkway
Memorial Avenue
Washington, DC

SUBMITTED BY
United States Department of the Interior

REVIEW AUTHORITY
Federal Projects in the District
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
8778

NCPC MAP FILE NUMBER
1.45(73.10)46221

APPLICANT'S REQUEST
Approval of preliminary site and building plans

ACTION TAKEN
Approved preliminary site and building plans with comments

The Commission:

Approves the preliminary site and building plans for the proposed Monumental Arch, located at Memorial Circle on Columbia Island in Washington, DC, with comments to be addressed prior to final review.

Supports the purpose of the project to celebrate America's Semiquincentennial.

Notes the general site was identified as a location for potential design features as part of the McMillan Commission (1902) and Arlington Bridge Commission (1925); and

Notes, as with these previously contemplated designs, any new monumental structure at this location must balance urban design, visitor experience, historic preservation, transportation, and other considerations.

Notes that, in response to the Commission's concept review requests, the applicant has provided additional information regarding various topics as outlined in this report and further detailed in the analysis.

Height of Buildings Act

Notes that NCPC's role as the central planning agency for the federal government in the nation's capital has included application of the Height of Buildings Act to preserve the horizontal skyline of the District.

Notes that in light of the applicant submission, NCPC is continuing to consider the positions regarding the Height of Buildings Act and whether it is binding on the federal government, which the Commission will need to decide prior to taking final action on the project.

Requests the applicant provide a justification for the project's height when the project returns to NCPC for final approval.

Pedestrian Accessibility

Notes the Commission requested a transportation or traffic study that evaluated the proposed pedestrian access to ensure that visitors can avoid pedestrian and vehicular conflicts.

Notes the proposed design has been updated to include four full traffic signals at each of the eight pedestrian crossings, instead of flashing pedestrian signals, as well as eliminating vehicular merge movements through the circle, including northbound and westbound traffic movements around the circle from northbound Washington Boulevard, improving driver expectations.

Finds traffic movement will be simplified and the addition of pedestrian-activated traffic signals will provide safer pedestrian and bicycle circulation for visitors to the arch, as well as daily commuters.

Finds that while the proposed traffic signals will improve pedestrian safety, the inclusion of 32 individual traffic signal poles around the circle could also create visual clutter in the viewshed and **encourages** the applicant to consider fewer individual traffic signal poles should additional analysis warrant a reduction without compromising safety.

Vehicular Network

Notes that the Commission requested a transportation or traffic study that identifies any potential impacts of the proposed project on the road network and level of service.

Notes that the applicant has prepared a traffic study, and according to the submission, there will be impacts to vehicular traffic and access around the circle including:

- Potential traffic delays during the weekday morning peak of almost half a mile on the Washington Boulevard and the George Washington Memorial Parkway; and
- Removal of northbound and westbound movements around the circle from Washington Boulevard, where visitors will no longer be able to access Arlington National Cemetery from Washington Boulevard.

Finds that while the project will limit overall vehicular traffic movement around the circle and potentially increase delays on Washington Boulevard from the south, the design will improve pedestrian and bicycle safety and circulation.

Notes that the applicant has stated that further refinement of traffic signal timing will occur as visitation to the arch is better understood.

Requests the applicant provide, as part of the final submission, updated information regarding the potential off-site impacts to the vehicular transportation network in response to comments from the District Department of Transportation and Arlington County, Virginia.

Requests the applicant continue to work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate, regarding the proposed changes and impacts to the surface transportation network.

Loading/Unloading

Notes that the Commission requested information regarding parking and loading/unloading for visitors to the arch to ensure safe access for those of all abilities and minimize disruption to the traffic network.

Notes that the applicant is proposing to utilize the Arlington National Cemetery Garage for visitor parking and Memorial Avenue for visitor pick up and drop off.

Requests the applicant provide details regarding pick-up, drop-off, and loading locations, and coordinate with Arlington National Cemetery prior to final review regarding the use of the Memorial Avenue and the cemetery parking garage for arch visitor parking.

Visitor Safety

Notes at concept review, the Commission requested the applicant provide, as part of this review, a risk assessment and evaluation of the project to ensure that the proposed design will address security considerations.

Note the applicant included a summary of the project's security considerations and details regarding the site elements.

Supports the integration of site security features, including the seat wall, to help protect the visitor experience while not detracting from the project design.

Aviation Safety

Notes the Commission previously recommended the applicant continue consultation with the Federal Aviation Administration to evaluate potential impacts of the proposed project on air navigation and provide an update to the Commission as part of the next review, and advised them that any design recommendations provided by the FAA should be incorporated into the proposed project prior to the Commission's final action.

Notes the Federal Aviation Administration conducted a limited aeronautical review concerning the feasibility of the arch and found the structure would have no significant adverse effect on airspace and visual/instrument procedures at Ronald Reagan Washington National Airport, subject to the inclusion of red obstruction lights.

Notes the Federal Aviation Administration requires a full aeronautical study for the actual design of the arch prior to its construction; and therefore

Requests the final plans include any navigational or safety lighting as required by the Federal Aviation Administration.

Advises the applicant that if, subject to the full Federal Aviation Administration study, any component of the project design must be altered, the updated design must be submitted to the Commission for review.

Viewsheds

Notes at concept review, the Commission requested:

- Updated photo-visualizations (renderings) of existing and proposed pedestrian-level views from the north steps of the Jefferson Memorial looking toward the Lincoln Memorial, and from the George Washington Memorial Parkway, one looking south toward the circle from a point immediately south of I-66, and one looking north toward the circle from a point near the Lyndon B. Johnson Memorial Grove; and
- Design options that were explored to avoid or minimize impacts on the visual connection between Arlington House and the Lincoln Memorial.

Notes that the applicant has included updated renderings from several vantage points which demonstrate the visual impact of the arch.

Finds that based on newly submitted renderings from the north and south of the George Washington Memorial Parkway and more distant views, the visual impacts will be evident but less visible than the direct views from the Memorial Avenue/Arlington Bridge axis.

Notes the applicant has stated that various smaller arch heights were evaluated. The smaller arches were ultimately dismissed because according to the applicant, they would have had greater impacts on the cultural landscapes, specifically the views between the Lincoln Memorial and Arlington National Cemetery. The smaller designs fully obstructed this view and did not create any new viewing opportunities, in contrast to the proposed arch, which would allow a less obstructed view through its central opening. In addition, because the arch is intended to celebrate 250 years of American independence, the smaller heights were not considered representative of this milestone.

Finds the scale of the arch and its opening have a relational impact on direct and panoramic views from different elevations resulting in tradeoffs, which should be considered in balance with the project's overall purpose and need. In its current form, the proposed arch will:

- Allow for framed views of the Lincoln Memorial and Arlington House from the lower elevations of Memorial Bridge and Memorial Avenue.
- Fully obstruct reciprocal views of the Lincoln Memorial and Arlington from the higher elevations of Arlington House and the Lincoln Memorial terrace; and
- Introduce a new panoramic view of the monumental core from the observation deck.

Requests the applicant continue to consult as necessary with the federal agencies and the Section 106 consulting parties, to continue to explore ways to minimize impacts to historic resources, and to determine appropriate mitigation to resolve adverse effects, to be included in a Programmatic Agreement.

Project Design and Materials

Notes that the Commission previously requested the applicant provide, as part of this submission, information regarding the proposed arch and site materials palette, including cladding, paving, pedestrian features, and security elements, the proposed lighting strategy, including nighttime renderings from key views demonstrating the lighting concept in context, and the proposed stormwater management strategy.

Notes that the applicant has submitted the proposed materials including three potential granite cladding options for the exterior of the arch with the final selected dependent on availability and desired color.

Requests that, prior to final review, the applicant provide information about the final granite cladding selection.

Notes that the applicant intends to include lighting at the site including in-ground recessed uplighting, up-lights above the impost base, entablature, and attic story, and to up-light the statuary, with eight 14- to 20-foot tall, ground-mounted light stanchions around the circle to ensure the arch is brilliantly illuminated.

Requests the applicant submit a narrative describing the proposed lighting concept and its relationship to the Lincoln Memorial and Arlington National Cemetery that includes relevant details on the proposed lighting stanchions and any other site lighting, including illumination levels proposed (foot lambers, or other measure) to understand the relative brightness of the monument as compared to other national monuments and memorials, and to protect the lighting hierarchy of the National Mall.

Notes that the applicant included stormwater management details in the submission and will utilize bioretention with native grasses and shrubs around the perimeter of the circle to accommodate runoff, and additional coordination with the District Department of Energy and Environment will be necessary to meet all applicable permitting requirements.

Project Coordination

Notes the Commission previously requested as part of this submission, updates on the Section 106 process and the National Environmental Policy Act (NEPA) evaluation process, as completion of both processes is required prior to the Commission's final action.

Notes the applicant is lead federal agency for the preparation of an Environmental Assessment and Finding of No Significant Impact pursuant to the National Environmental Policy Act, and NCPC utilized the applicant's EA for purposes of compliance with the Act.

Notes the National Park Service initiated the Section 106 process of the National Historic Preservation Act on June 6, 2026, and prepared a draft Assessment of Effects and Programmatic Agreement and held a consulting parties meeting on June 15, 2026.

Notes NCPC designated the National Park Service as lead federal agency for the purpose of compliance with the Section 106 process of the National Historic Preservation Act.

7/10/2026

Meghan Hottel-Cox
Secretary to the National Capital Planning Commission

Executive Director's Recommendation

Commission Meeting: November 5, 2026

PROJECT
New Monumental Arch
George Washington Memorial Parkway
Memorial Avenue
Washington, DC

SUBMITTED BY
United States Department of the Interior

REVIEW AUTHORITY
Federal Projects in the District
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
8778

NCPC MAP FILE NUMBER
1.45(73.10)46221

APPLICANT'S REQUEST
Approval of final site and building plans

PROPOSED ACTION
Approve final site and building plans with comments

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The U.S. Department of the Interior (the "applicant") has submitted the final site and building plans for a new monumental arch to be located in Memorial Circle for Commission approval. The Commission approved the preliminary plans at the July 9, 2026 meeting and provided comments on the concept plans at the June 4, 2026 meeting. The applicant proposes an arch topped with gold statuary in the center of Memorial Circle in Washington, DC. The overall height from the base to the top of the statuary is 250 feet.

Memorial Circle is located on Columbia Island, which is within the boundary channel of Washington, DC. Construction of the circle began in 1940. It sits at the west terminus of Arlington Memorial Bridge, which was designed by the architectural firm McKim, Mead, & White and opened in 1932. In response to the Commission's previous requests, the applicant has provided final details regarding various topics, including the site and building design, height, circulation, and lighting.

KEY INFORMATION

- The Arlington Memorial Bridge (Memorial Bridge) spans the Potomac River and provides a connection between the Lincoln Memorial on the east and Arlington National Cemetery on the west via Memorial Circle and Memorial Avenue. The bridge, including Memorial Circle, was designed to create a physical and symbolic connection between the North and South.
- Prior to construction, the design of Memorial Circle went through multiple design iterations that began as a formal space with decorative pillars on either side of the axial view to the current design of a traffic circle within oval loops connecting it to area roadways.

- The Memorial Bridge was restored between 2019-2023 to address structural, aesthetic and functional issues. Memorial Circle was not included in this restoration.
- In 1980 the bridge, including Memorial Circle, was listed on the National Register of Historic Places for its architectural characteristics and innovative engineering.
- The sight line, design, and landscape features of Memorial Avenue, which includes Memorial Circle, are contributing elements of the National Register-listed Arlington National Cemetery Historic District and Arlington Memorial Bridge.
- The Memorial Circle is administered and maintained by the George Washington Memorial Parkway, a unit of the National Park Service (NPS).
- The proposed project includes a 166-foot-tall arch structure topped with three gilded figures which extend to an overall height of 250 feet.
- Access to the arch is proposed by the applicant at ground level using new pedestrian refuge island areas, crosswalks, and traffic signals.
- The Commission provided comments on the concept plans for the project at the June 4, 2026 meeting and approved the preliminary design with comments at the July 9, 2026 meeting.
- The U.S. Commission of Fine Arts approved the concept plan for the proposed arch with comments at the April 16, 2026 meeting. The final design was approved at their May 21, 2026 meeting.

RECOMMENDATION

The Commission:

Approves the final site and building plans for the proposed Monumental Arch, located at Memorial Circle on Columbia Island in Washington, DC.

Supports the purpose of the project to celebrate America's Semiquincentennial.

Notes the general site was identified as a location for potential design features as part of the McMillan Commission (1902) and Arlington Bridge Commission (1925); and

Notes that, in response to the Commission's requests at preliminary review, the applicant has provided additional information regarding various topics as outlined in this report and further detailed in the analysis.

Arch Height

Notes that the Commission requested a justification for the project's height at the preliminary review and the applicant has provided a justification.

Notes that while the Commission previously considered the question of applicability of the Height of Buildings Act to the federal government, a conclusion to that question is not needed for the project here before the Commission.

Notes that, upon consideration of the supplemental materials submitted by the applicant and deliberated among the Commissioners, the Commission agrees that in 1925 Congress authorized a plan submitted by the Arlington Memorial Bridge Commission in 1924 that included elements above the limit prescribed by the 1910 Height of Buildings Act and gave the Arlington Bridge Commission the discretion to revise the design, which discretion is now exercised by the Department of the Interior.

Finds that, based on the submitted materials and deliberations by the Commission, because Congress implicitly waived the Height of Buildings Act in its 1925 action, the revised design is not required to comply with the Height of Buildings Act.

Approves the final height of the project as proposed by the applicant.

Pedestrian Accessibility

Notes the applicant has submitted an updated traffic study that evaluates the proposed pedestrian access to ensure that visitors can avoid pedestrian and vehicular conflicts and reduces the number of individual traffic signal poles from 32 to 17 as requested by the Commission.

Supports the reduction of the number of signal poles which helps remove visual clutter and maintain pedestrian and vehicular safety.

Vehicular Network

Notes that the applicant has prepared an updated traffic study that identifies potential impacts from the project on the road network and level of service, identifies potential traffic delays and alternate routes from the removal of northbound and westbound movements around Memorial Circle, and the broader impacts of the long-term traffic modifications as requested by the Commission.

Finds that while the project may alter overall vehicular traffic movement around the circle and increase delays on Washington Boulevard from the south, the design will improve pedestrian and bicycle safety and circulation around Memorial Circle as compared to current conditions.

Notes that the applicant has stated that further refinement of traffic signal timing will occur as visitation to the arch is better understood.

Encourages the applicant to continue to work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate, regarding the proposed changes and impacts to the surface transportation network through construction and project implementation.

Loading/Unloading

Notes that the Commission requested the applicant provided details regarding pick-up, drop-off, and loading locations, and coordinate with Arlington National Cemetery regarding the use of Memorial Avenue and the cemetery parking garage for visitor parking.

Notes that the applicant has submitted updated information regarding parking and loading/unloading for visitors to the arch that proposes utilizing the Arlington National Cemetery Garage for visitor parking and Memorial Avenue for visitor pick up and drop off.

Encourages the applicant to continue coordination with Arlington National Cemetery regarding the use of the Memorial Avenue and the cemetery parking garage for arch visitor parking as the project is implemented.

Aviation Safety

Notes the Commission requested the final plans include any navigational or safety lighting as required by the Federal Aviation Administration.

Notes the Federal Aviation Administration provided the applicant with a *Determination of no hazard to air navigation* finding for the proposed arch with a condition for safety lighting that includes a non-standard eternal flame and continuous floodlighting by searchlight projectors installed at three or more equidistant points to provide illumination to the top one-third of the structure which are included in the final submission.

Project Design and Materials

Notes that the Commission previously requested the applicant provide a narrative describing the proposed lighting concept and its relationship to the Lincoln Memorial and Arlington National Cemetery that includes relevant details on the proposed lighting stanchions and any other site lighting, including illumination levels proposed (foot lambers, or other measure) to understand the relative brightness of the monument as compared to other national monuments and memorials, and to protect the lighting hierarchy of the National Mall.

Notes that the applicant submitted the final lighting plan that includes architectural accent lighting at the building crown and underside of the arch, and to up-light the statuary, six ground-mounted light stanchions around the circle to ensure the arch is brilliantly illuminated and to meet Federal Aviation Administration (FAA) requirements.

Notes the proposed lighting levels have been designed to maintain approximately 15 footcandles at elevations of 150 feet and higher to eliminate the need for FAA aircraft warning lights.

Notes the applicant will utilize either Sierra White granite, Bethel White granite, Barre Granite, or Carrara Marble based on availability and the procurement process.

Encourages the applicant to monitor and refine the proposed lighting plan after implementation to ensure a balance between required lighting and the project's setting.

Encourages the applicant to continuously monitor the noise level of construction activities to minimize impacts to Arlington National Cemetery.

Project Coordination

Notes the applicant is lead federal agency for the preparation of an Environmental Assessment (EA) and Finding of No Significant Impact pursuant to the National Environmental Policy Act, and NCPC utilized the applicant's EA for purposes of compliance with the Act.

Notes the applicant submitted a final Environmental Assessment and final Finding of No Significant Impact.

Adopts the Environmental Assessment prepared by the National Park Service, dated October 2026 for use by the Commission.

Notes the National Park Service initiated the Section 106 process of the National Historic Preservation Act on June 5, 2026, with a draft Assessment of Effects and Programmatic Agreement and held consulting parties meetings on June 15 and September 9, 2026. The Advisory Council on Historic Preservation advised that it was terminating consultation for the project on September 24, 2026 and provided final comments to the applicant on October 9, 2026, which the applicant acknowledged as received on October 9, 2026, which concluded the Section 106 process.

Notes NCPC designated the National Park Service as lead federal agency for the purpose of compliance with the Section 106 process of the National Historic Preservation Act on June 10, 2026.

PROJECT REVIEW TIMELINE

Previous actions	**June 4, 2026** – Comments on concept plans **July 9, 2026 –** Approved preliminary site and buildings plans
Remaining actions (anticipated)	– None

PROJECT ANALYSIS

Executive Summary

The U.S. Department of the Interior has submitted final plans for a new monumental arch in Memorial Circle, located on Columbia Island in Washington, DC. Per the submission, the overall design is 250 feet tall and consists of an arch structure which is 166 feet in height, topped with statuary. The project sits within a plaza that consists of granite pavers and is surrounded by a seat wall with bollards aligning with the openings of the arch. The plan includes changes to Memorial Circle with new pedestrian refuge island areas, new pedestrian crosswalks, and traffic signals. In July 2026, the Commission approved the preliminary plans for the proposed project with recommendations. The Commission expressed support for the purpose of the arch, which is to celebrate America's Semiquincentennial. In addition, the Commission found the scale of the arch and its opening have a relational impact on direct and panoramic views from different elevations resulting in tradeoffs, which should be considered in balance with the project's overall purpose

and need. In its current form, the proposed arch will allow for framed views of the Lincoln Memorial and Arlington House from the lower elevations of Memorial Bridge and Memorial Avenue; fully obstruct reciprocal views of the Lincoln Memorial and Arlington from the higher elevations of Arlington House and the Lincoln Memorial terrace; and introduce a new panoramic view of the monumental core from the observation deck. Further, the Commission requested additional information regarding a series of items related to the function and operations of the facility, as well as other details of the project at the final review. The applicant has provided information in response to those requests, and therefore, the **Commission may approve the final site and building plans for the proposed Monumental Arch.** A summary of the submission responses and analysis follows in the report below.

Overview

History and Background of Site

According to the Cultural Landscape Report (CLR) published by the National Park Service in 2024, the Memorial Avenue Corridor was designed as a symbolic and physical link between the Lincoln Memorial, a tribute to the 16th American President; the entrance to Arlington National Cemetery; and Arlington House, the former plantation home of Confederate General Robert E. Lee. Architect William Mitchell Kendall, of the firm McKim, Mead & White, was responsible for the corridor's overall design. The corridor was built in phases: Arlington Memorial Bridge was constructed between 1926 and 1932; the Boundary Channel Bridge was built between 1929 and 1930; Memorial Circle was constructed on Columbia Island beginning in 1940; and Memorial Avenue was built beginning in 1930. Memorial Circle was designed as part of the western terminus of the Arlington Memorial Bridge as a means to connect to the George Washington Memorial Parkway, Arlington Boulevard, and Memorial Avenue.

According to the CLR, early designs for the area on Columbia Island that would become Memorial Circle included the bridge roadway meeting at an ellipse plaza where the cross arms would extend north and south from the ellipse. This elliptical plaza design also featured two columns, each 166 feet in height, each topped with a sculpture, intended to represent the post-Civil War reunion of the North and South, on either side of the Memorial Avenue roadway viewshed. The north and south arms of the ellipse plaza ended in small traffic circles, each with a circular Greek temple in the center. The designs for this area changed significantly before construction began on the single large traffic circle known today as Memorial Circle. The Circle has had other minor modifications over the years including reducing the travel lanes around the Circle to one, changing the paving materials, modifications to connecting roadways, and changes to pedestrian access and roadway efficiency as recently as 2020.

Project Purpose

According to the applicant, the purpose of the project is to celebrate 250 years of American independence by honoring America's founding principles through installation of a structure at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial

gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage. Staff supports the celebration of the 250th anniversary of the nation's independence and therefore recommends the **Commission support the purpose of the project to celebrate America's Semiquincentennial.**

According to the applicant, Arlington Memorial Bridge and Memorial Avenue serve as a ceremonial entrance to Washington, DC, and the gateway to Arlington National Cemetery, physically and symbolically uniting the nation's history along a corridor already lined with monuments honoring diverse figures of American significance. Executive Order 14252, *Making the District of Columbia Safe and Beautiful*, directs the Secretary of the Interior to develop proposals to ensure Federal buildings and lands uplift and beautify public spaces and generate in the citizenry pride in and respect for our Nation, promoting beautification and the preservation of our history and heritage. The project presents an opportunity to advance that directive within one of the most symbolically significant corridors in the Capital.

Project Description

The proposed project consists of an arch structure with two vertical supports at a height of 166 feet. The arch sits within a plaza that includes granite pavers encircled by a seat wall and two pedestrian access points lined with bollards. The two access points face east and west, aligned with the opening of the arch. The circle is shown with new pedestrian crosswalks connecting visitors via pedestrian refuge islands next to the traffic circle. Since the preliminary design the applicant has studied the transportation plan and eliminated 15 of the 32 traffic signal poles and has noted that traffic face and pedestrian signal head should be installed on the same fixture. The remainder of the project design is consistent with the plan the Commission approved at preliminary review.

The exterior of the proposed arch will be primarily clad in stone. The top area of the arch structure that includes the mezzanine, below the observation deck and statuary plinth, includes gold lettering quoting the American Pledge of Allegiance on both east and west facing sides. Above the primary arch structure and mezzanine is a recessed area housing the observation deck interior space and, above that, the proposed statuary. The proposed statues include a 60-foot-tall central gold, winged female figure flanked by a gold flying eagle on each side. All the statuary is facing east toward the Lincoln Memorial. There are also additional gold decorative elements on the underside of the arch and on each vertical face.

The proposed interior of the arch at the ground floor level includes ticketing and security, back of house space, stairwells, and elevators in the south vertical support, with an exit hall, back of house space, stairwells, and elevators in the north vertical support. The plans include a stair hall, restrooms, program spaces, and stair and elevator lobbies that connect up from the legs in the mezzanine. The stair hall includes two additional staircases and an elevator in the center to provide access to the observation deck above.

Arch Height

NCPC's role as the central planning agency for the federal government in the nation's capital has included application of the Height of Buildings Act of 1910 (HBA) to preserve the horizontal skyline of the District. During the preliminary review of the project in July 2026, the Commission requested that the applicant submit a justification for the project's height as part of the final review. The applicant has submitted a justification that states, in part "the 1925 Act [of Congress] authorizing implementation of the Memorial Bridge Commission's 1924 report explicitly authorized a structure on Columbia Island exceeding the height restriction of the HBA."

The Commission considered the justification provided by the applicant and convened an Executive Session for Commission deliberation. The consensus of the majority of Commissioners was that:

- As the 1925 Congress authorized a plan submitted by the Arlington Memorial Bridge Commission in 1924 that included elements above the limit prescribed by the HBA, Congress provided an implied waiver to the HBA which remains today;
- Congress gave the Arlington Bridge Commission the discretion to revise the design and, when the Arlington Bridge Commission was abolished in 1933 its authorities were transferred to the Department of the Interior by the President;
- Thus, the discretion to revise the design of elements in the 1924 Arlington Memorial Bridge Commission report is now exercised by the Department of the Interior, and the Commission accepts the project submission as an exercise of that discretion; and therefore,
- The **Commission finds that, based on the submitted materials and deliberations by the Commission, because Congress implicitly waived the Height of Buildings Act in its 1925 action, the revised design is not required to comply with the Height of Buildings Act;** and further
- **The Commission approves the height of the project as submitted by the applicant.**

Pedestrian Accessibility

The arch is intended to be a visitor destination and includes an observation deck. Memorial Circle is an integral part of the vehicular access between the Arlington Memorial Bridge and the George Washington Memorial Parkway, Washington Boulevard, and Memorial Avenue with significant traffic volume, especially on the eastern side of the circle. As such, it will be important to ensure the continued safe operation of the traffic network, as well as the safe passage of visitors. At preliminary review, the Commission requested a transportation or traffic study that evaluated the proposed pedestrian access to ensure that visitors can avoid pedestrian and vehicular conflicts. The applicant submitted an updated traffic study that evaluated pedestrian safety and level of service and determined the proposed traffic configuration is safest for pedestrians. Additionally, the study determined the design should provide sufficient space for pedestrians to cross safely with some delay during peak visitation periods. The study acknowledges that further refinements are expected to the traffic signal phasing and timing as the project is implemented.

Vehicular Accessibility

At the preliminary review, the Commission also requested updated information regarding the potential off-site impacts to the vehicular transportation network in response to comments from

the District Department of Transportation and Arlington County, Virginia. The updated traffic study included additional analysis to the larger road network and level of service with updated routes to replace the eliminated northbound and westbound movements through Memorial Circle. The updated study found that the only recurring congestion in the study area after the implementation of the project occurs during the weekday morning commuter peak period along Washington Boulevard at the merge with the George Washington Memorial parkway ramp, south of Memorial Circle. The study found based on research at similar sites indicates that the project will likely attract the highest volumes of visitors during the early afternoon, weekends, and holidays, when vehicular traffic demand through the area is lower. The updated analysis further concluded that the majority of both existing and future delays are driven by the weave merge south of Memorial Circle and not by the planned traffic signals or pedestrian circulation improvements. The existing weave merge leads to an average queue length of 2,700 feet and is anticipated to increase to 3,000 feet after the implementation of the project. This increase will not extend to the I-395 interchange which is approximately 7,000 feet to the south of the project site.

Staff acknowledges the proposed plan will alter traffic movement, and as described in the submission materials, may increase vehicular delays to help improve pedestrian access. As such, staff recommends the **Commission find that while the project may alter overall traffic movement around the circle and increase delays on Washington Boulevard from the south, the design will improve pedestrian and bicycle safety and circulation** and **supports the reduction of the number of signal poles which helps remove visual clutter and maintain pedestrian and vehicular safety.** NCPC received additional comments from both the District Department of Transportation and Arlington County, Virginia regarding the transportation study materials. In reply, the applicant submitted responses to offer clarity and emphasize their commitment to continued coordination on the transportation design as the project is implemented.

After the project is completed, the applicant has stated that further refinement of traffic signal timing will occur as visitation to the arch is better understood. Regarding this and other issues, staff suggests the **Commission request the applicant continue to work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate, regarding the proposed changes and impacts to the surface transportation network through construction and project implementation.**

Loading/Unloading

At preliminary review, the Commission requested information regarding parking and loading/unloading for visitors to the arch to ensure safe access for those of all abilities and minimize disruption to the traffic network. The application has coordinated with Arlington National Cemetery (ANC), the National Park Service (NPS) and the U.S. Park Police (USPP) on a curb use management plan to address the various visitors to the site. The proposed plan includes the use of the ANC parking facilities for private vehicles and motorcoach parking will also be accommodated by ANC. The plan states that Memorial Avenue, with 60 feet of right of way and four lanes, will be used for pick-up and drop-off for visitors to the site. The plan also designates areas for NPS and USPP staff parking. Therefore, staff suggests the **Commission encourage the applicant to continue coordination with Arlington National Cemetery regarding the use of Memorial Avenue and the cemetery**

parking garage for arch visitor parking as the project is implemented.

Aviation Safety

The proposed project is shown at a height of 250 feet and the location along the Potomac River is approximately 3,000 feet from Ronald Reagan Washington National Airport, near landing approaches for two runways (01/19 and 15/33). At the previous review, the Commission requested the applicant incorporate any navigational safety lighting as required by the Federal Aviation Administration (FAA) and continue consultation with the FAA to evaluate potential impacts of the proposed project on air navigation. The FAA has provided the applicant with a *Determination of no hazard to air navigation* finding for the proposed arch with a condition for safety lighting that includes a non-standard eternal flame and continuous floodlighting by searchlight projectors installed at three or more equidistant points to provide illumination to the top one-third of the structure. These elements are included in the final submission.

Project Design and Materials

The Commission previously requested the applicant provide, as part of this submission, the final granite cladding selection and the application states that several stone cladding options remain under consideration. These include Sierra White granite; Bethel White granite; Barre Granite; and Carrara Marble. A final selection will be made during the procurement process.

In addition the Commission requested the applicant submit a narrative describing the proposed lighting concept and its relationship to the Lincoln Memorial and Arlington National Cemetery that includes relevant details on the proposed lighting stanchions and any other site lighting, including illumination levels proposed (foot lambers, or other measure) to understand the relative brightness of the monument as compared to other national monuments and memorials, and to protect the lighting hierarchy of the National Mall. The applicant submitted a lighting study of other similar monuments and memorials on or near the National Mall and their corresponding nighttime lighting levels. The study demonstrates similar lighting levels to that proposed at the project. The applicant also submitted the final lighting plan that includes architectural accent lighting at the building crown and underside of the arch, and to up-light the statuary, six ground-mounted light stanchions around the circle to ensure the arch is illuminated and to meet FAA requirements. The proposed lighting levels have been designed to maintain approximately 15 footcandles at elevations of 150 feet and higher to eliminate the need for FAA aircraft warning lights, as conditioned in the FAA *Determination of no hazard to air navigation* finding. Adjustments of lighting levels and details often occur after implementation. As such, staff recommends the **Commission encourage the applicant to monitor and refine the proposed lighting plan after implementation to ensure a balance between required lighting and the project setting.**

Staff notes the applicant also considered comments regarding construction impacts to ANC. As part of the submission, including the EA, the applicant evaluated potential noise levels at the project site during and after construction to understand any impacts to the area and possible

mitigation strategies. The noise level study modeled how pile driving for the project foundations, which is the loudest anticipated activity, could affect sound conditions in the area. The modeling found that adding noise blankets or noise curtains as mitigation could reduce the sound impact of the pile driving to at, or below, the maximum sound level recommended around cemeteries. The model results also noted that the area is already a high ambient noise area and much of the anticipated construction noise would be indistinguishable from the existing ambient noise or from the noise generated by other construction projects planned or ongoing in the area. Ongoing coordination should occur between the applicant and ANC as construction commences. Therefore, staff recommends the **Commission encourage the applicant to continuously monitor the noise level of construction activities to minimize impacts to Arlington National Cemetery.**

Finally, staff notes the applicant is proposing to utilize bioretention with native grasses and shrubs around the perimeter of the circle to accommodate stormwater runoff. Additional coordination with the District Department of Energy and Environment will be necessary to meet applicable permitting requirements.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

Staff reviewed the project considering the policies set forth in the *Comprehensive Plan for the National Capital,* particularly those found in the Urban Design, Historic Preservation, Parks and Open Space, and Visitors and Commemoration Elements as described in this report. Several Comprehensive Plan policies acknowledge the need to balance new uses and contemporary needs within existing landscapes and the built legacy of Washington, DC (POS.A.8 and POS.A.12). This should be done in balance with protecting key design elements like viewsheds as described at preliminary review (HP.D.3). The policies recognize that the Nation's Capital will continue to change and develop over time.

As a reminder, the Commission takes a holistic approach when applying the Comprehensive Plan policies in the context of the project's needs and objectives when making a determination regarding consistency. On the whole, the project is generally consistent with the Federal Elements of the *Comprehensive Plan for the National Capital*.

National Historic Preservation Act

Both NPS and NCPC have a responsibility to comply with the National Historic Preservation Act. NPS initiated the Section 106 process of the National Historic Preservation Act on June 6, 2026. NCPC notified NPS in writing on June 10, 2026, that, in accordance with the relevant regulations, NCPC was designating NPS as the lead federal agency for purpose of compliance with the Section 106 process of the National Historic Preservation Act. Subsequently, NCPC participated in the Section 106 process as a consulting party. At preliminary review, the Commission requested the applicant continue to consult as necessary with the federal agencies and the Section 106 consulting

parties, to continue to explore ways to minimize impacts to historic resources, and to determine appropriate mitigation to resolve adverse effects.

NPS prepared a draft Assessment of Effects and Memorandum of Agreement and held a consulting parties meetings on June 16, 2026 and September 9, 2026. On September 24, 2026, the Advisory Council on Historic Preservation (ACHP) notified NPS and all consulting parties, including NCPC, that it had terminated consultation on the project pursuant to 36 CFR § 800.7(a)(4). ACHP held a meeting on September 29, 2026 to allow consulting parties to provide any views on this undertaking and proposed resolution of adverse effects. On October 7, 2026, the ACHP provided its final comments to the Secretary of Interior, and the Secretary of Interior responded on October 9, 2026, which officially concluded the Section 106 process according to the relevant regulations.

Thus, NCPC participated in the Section 106 process per its obligations regarding the project. Termination concludes the Section 106 process, and, as NCPC had designed NPS lead agency, the termination also concluded NCPC's responsibilities under the National Historic Preservation Act.

National Environmental Policy Act

Both NPS and NCPC have a responsibility to comply with the National Environmental Policy Act (NEPA). NPS is lead agency and prepared an Environmental Assessment, dated October 2026, and issued a Finding of No Significant Impact for the project on October 9, 2026. As noted in the EA, the construction of the arch will celebrate 250 years of American independence by honoring America's founding principles through installation of a structure at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American Heritage. However, the EA states the impacts are not likely to be significant. Further, the proposed project will meet the stated purpose and need. Per NEPA and NCPC's NEPA regulations, NCPC may utilize environmental documentation prepared by another agency for a project submitted to NCPC. As such, the **Commission may adopt the Environmental Assessment prepared by the National Park Service, dated October 2026 for use by the Commission**. A Finding of No Significant Impact (FONSI) was prepared based upon the EA and the submission materials. The FONSI will be signed following the Commission's action on the application.

Commemorative Works Act

The applicant, the Department of the Interior, has indicated that the project is not subject to the Commemorative Works Act (CWA) and NCPC relies on the applicant to determine whether the CWA applies. In this case, NCPC is reviewing the project pursuant to the National Capital Planning Act.

CONSULTATION

Coordinating Committee

The Committee forwarded the proposed final site and building plans to the Commission with the statement that the proposal has been coordinated with some, but not all participating agencies. Commission of Fine Arts staff inquired about the lighting levels and noted their Commission has approved the project. The Department of Energy and Environment (DOEE) noted coordination was ongoing, and they are waiting for a storm water management plan to be submitted into the surface and groundwater system (SGS). The project reviewer will have further comments down the line.

The District of Columbia State Historic Preservation Office (DC SHPO) commented "they were not coordinating on this project and continue to strongly object to the proposed arch along with every consulting party that participated in the abbreviated Section 106 review process and the majority of the public who submitted comments." Participating agencies included NCPC, the U.S. General Services Administration, NPS, CFA, the DC SHPO, the District of Columbia Office of Planning, the District Departments of Transportation and Energy & the Environment, and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts, at their April 16, 2026 meeting, approved the concept plans for the monumental arch with comments for the applicant to consider. At their May 21, 2026 meeting, the Commission approved the final design.

PUBLIC COMMENT

NCPC has received a substantial number of public comments on the project. As of the date of this report, approximately 1,300 comments have been submitted. The vast majority of the comments received are in opposition to the project, specifically the height, scale, location, traffic impacts, and lack of sufficient public review process for the project. Others raised concerns about the celebratory intent in a solemn location. Some comments raised objections to components of the project outside of NCPC's purview such as the cost and compliance with the Commemorative Works Act. NCPC also received some comments in support, which have generally mentioned the need to celebrate the 250th anniversary of American independence. NCPC staff considered these concerns in the evaluation of the project as detailed in the analysis above.

ONLINE REFERENCE

The following supporting documents for this project are available online at www.ncpc.gov:

- Submission Package
- Project Synopsis

ATTACHMENTS

1. Agency Comments and Responses
2. U.S. Commission of Fine Arts letters

National Capital Planning Commission

New Monumental Arch

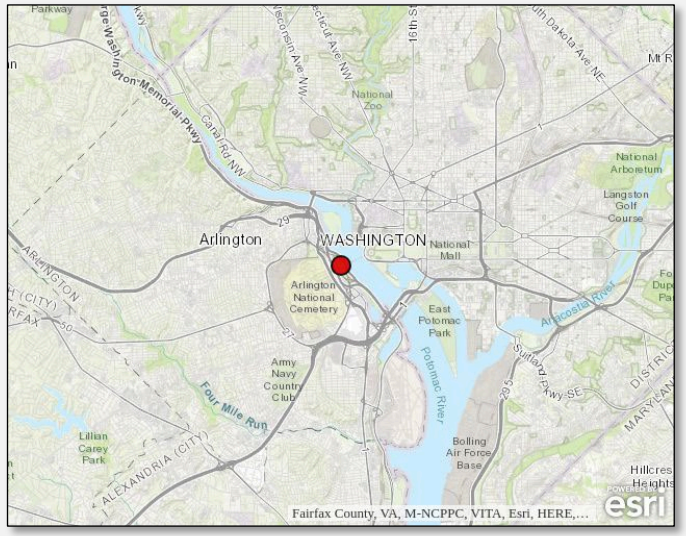
Memorial Avenue, Washington, DC

Approval of Final Site and Building Plans

United States Department of the Interior

November 5, 2026 | File: 8778

Site Location





Location Map

Project Location



Description of Project Area

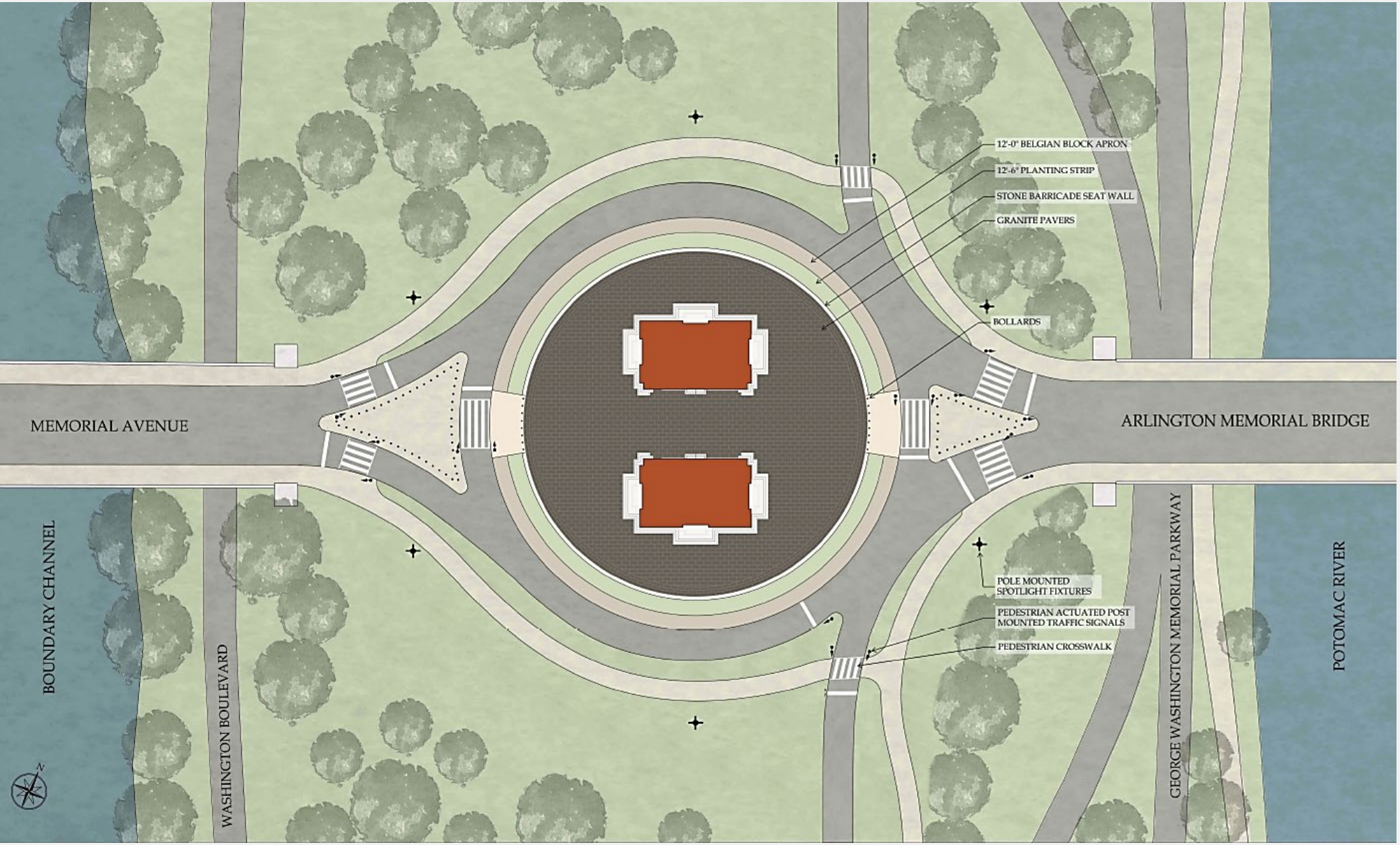


The project site is Memorial Circle, which is at the intersection of Memorial Bridge, Memorial Avenue and Washington Boulevard in Washington, DC.

The proposed construction and materials staging area is south of the project site.

Arlington National Cemetery is west of the project site and the Lincoln Memorial is east of the project site, across the Potomac River.

Final Site Plan



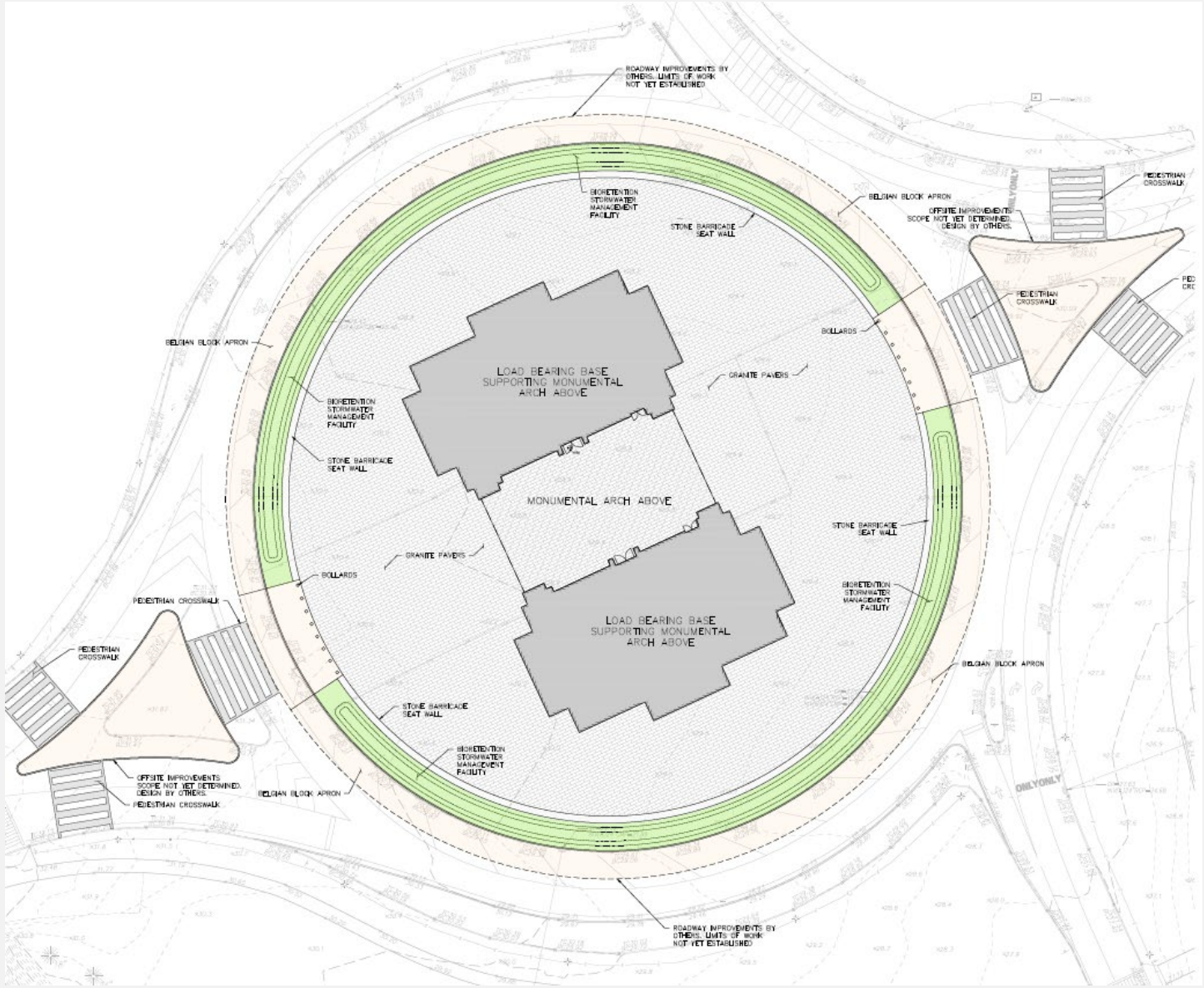
Proposed Elements:

- Belgian Block Apron
- Planting Strip
- Stone Seat Wall
- Granite pavers
- Recessed Up-Lights
- Bollards
- Pole Mounted Spotlights
- Pedestrian Crosswalk
- Traffic Signals

Updates:

- 15 Traffic Signals removed, 2 minimum maintained at each pedestrian crossing

Final Design



LEGEND:

LOAD BEARING BASE SUPPORTING MONUMENTAL ARCH ABOVE	
ARCH OVERHEAD	
GRANITE PAVERS	
LANDSCAPE	

Final Architectural and Design Program



Design

Final Monumental Arch Rendering



Final Monumental Arch Rendering



Updated Traffic Access Analysis



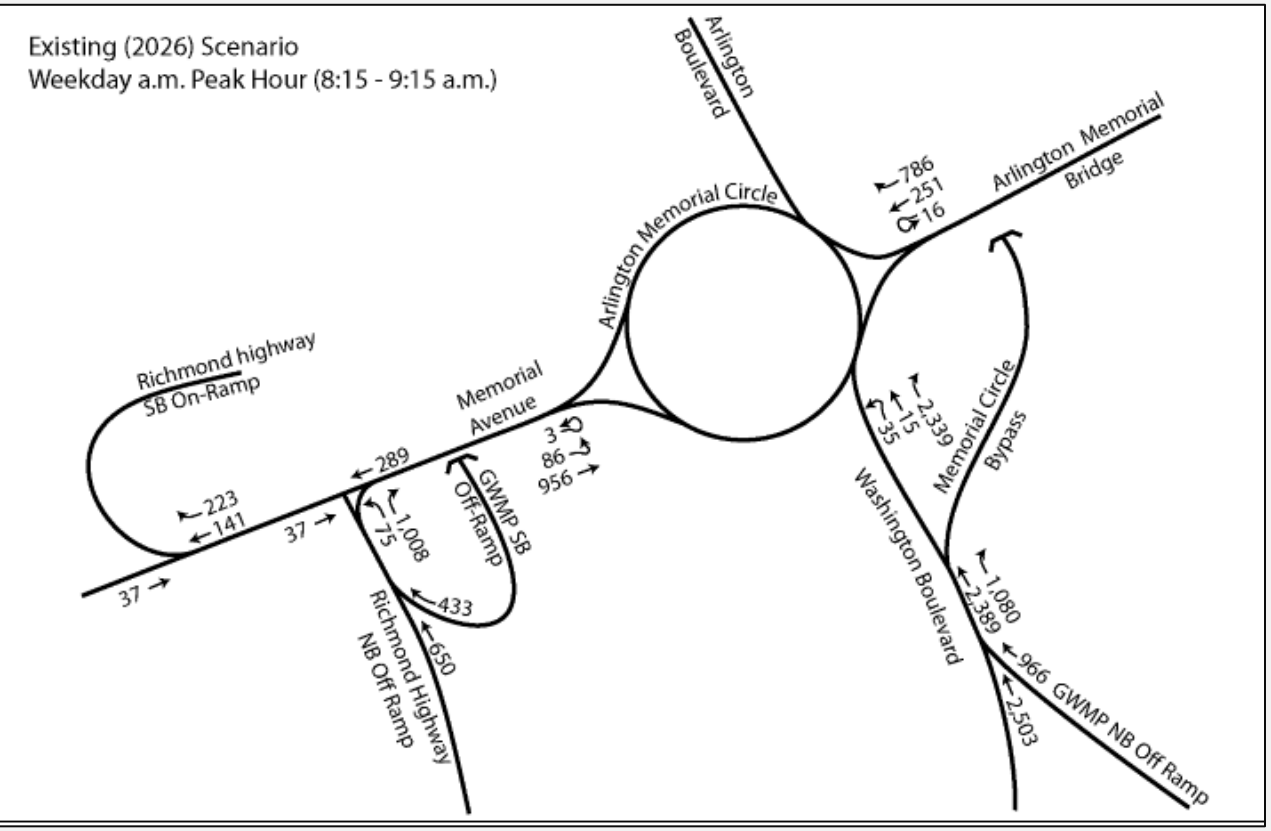
The study area was expanded to the south and west to evaluate potential impacts to the broader transportation network resulting from concerns that projected vehicle queues extended beyond the original study limits. Previous iterations of the traffic analysis only included AMC. This analysis was expanded to 4 additional approaches in the larger transportation network. The study includes the following areas and intersections:

1. AMC, including all surrounding approaches
2. Washington Boulevard at GWMP Ramps
3. Memorial Avenue at Richmond Highway/GWMP Off-Ramp
4. Memorial Avenue at Richmond Highway SB On-Ramp
5. Richmond Highway NB Off-Ramp at GWMP SB Off-Ramp

Existing Traffic Counts

Weekday Morning Peak Hour Traffic Counts

Existing 2026



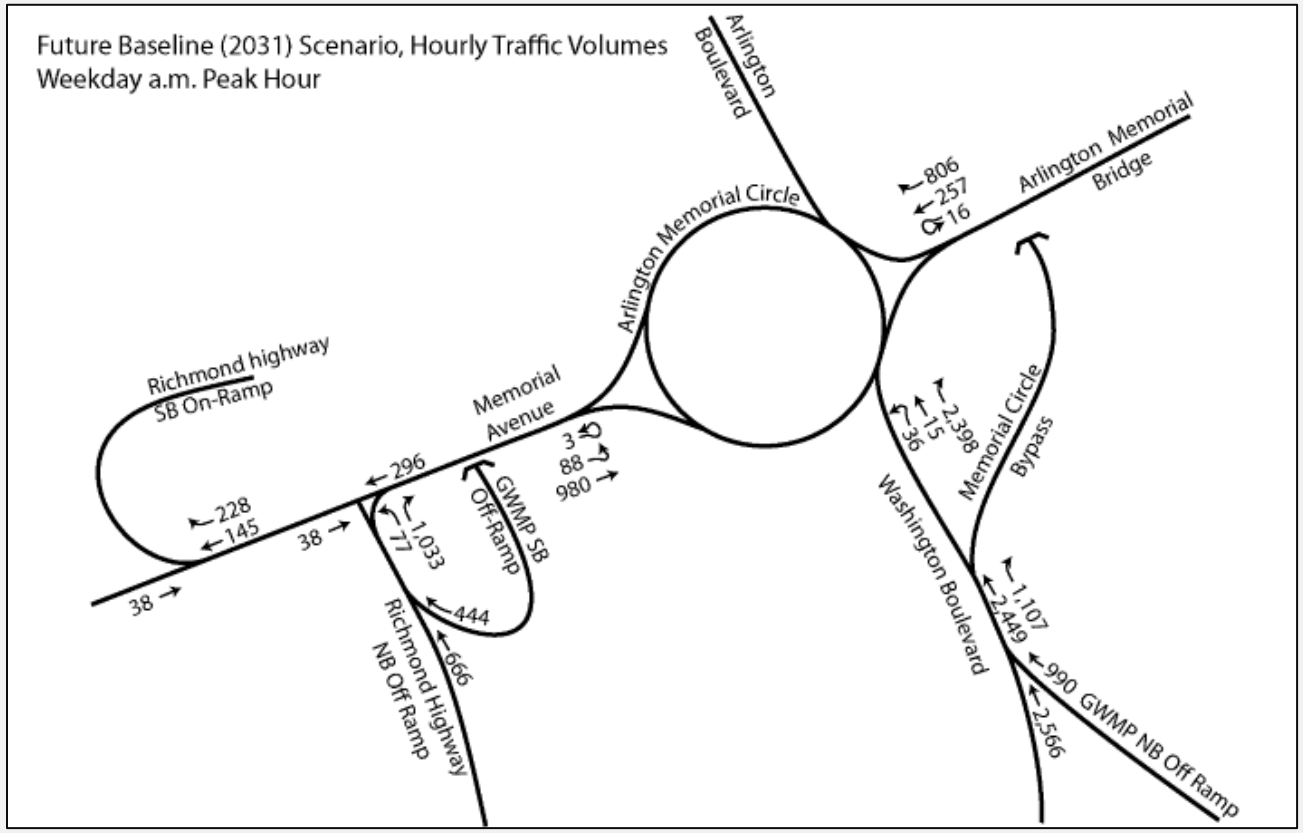
Throughout AMC, the highest traffic volumes occur at the Washington Boulevard northbound right turn movement and the Memorial Avenue eastbound through movement. Traffic from Washington Boulevard and from Memorial Avenue combine into traffic traveling over the AMB towards Washington D.C.

The highest volume occurs during the morning commuting period with a shorter and a higher peak exceeding 3,000 vehicles per hour.

Future Baseline Traffic Counts

Weekday Morning Peak Hour Traffic Counts

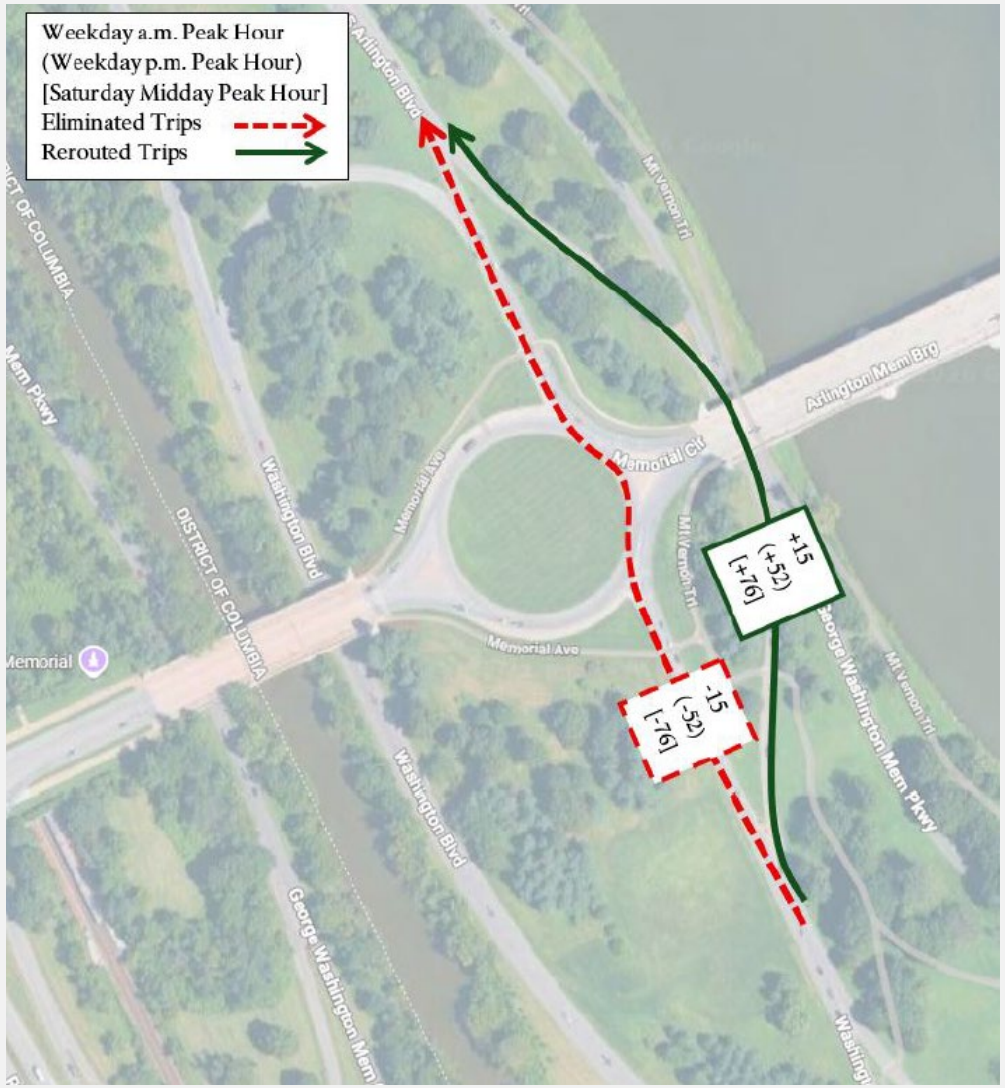
No Change 2031



Consistent with standard traffic study methodology, existing traffic volumes were projected to future-year conditions to evaluate and compare anticipated traffic operations without the proposed project (Future Baseline) and with the proposed improvements in place (Future Build). By comparing these two scenarios the traffic model can present a better measure of the impact of the project after it is fully operational. The future year for this project was established as five years, consistent with a typical short-term future traffic forecasting period.

Future traffic volumes were projected using a growth rate of 0.5% per year over five years. This growth rate is consistent with the forecasting of other regional transportation models and is supported by travel demand projections developed by the Metropolitan Washington Council of Governments (MWCOG).

Proposed Traffic Circulation Changes



Project eliminates:

1. Washington Boulevard northbound through movements
2. Washington Boulevard northbound to westbound Memorial Avenue

Traffic will be rerouted

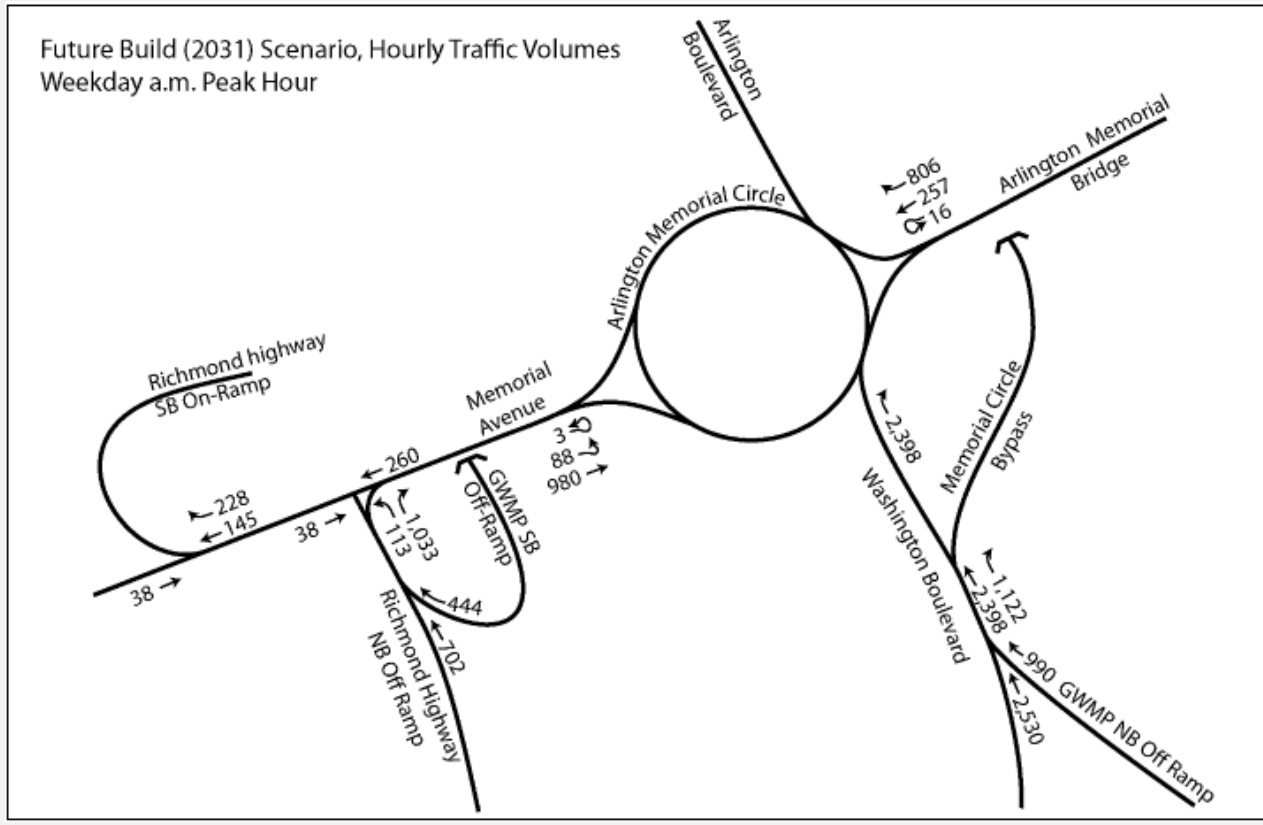


Future Traffic Counts

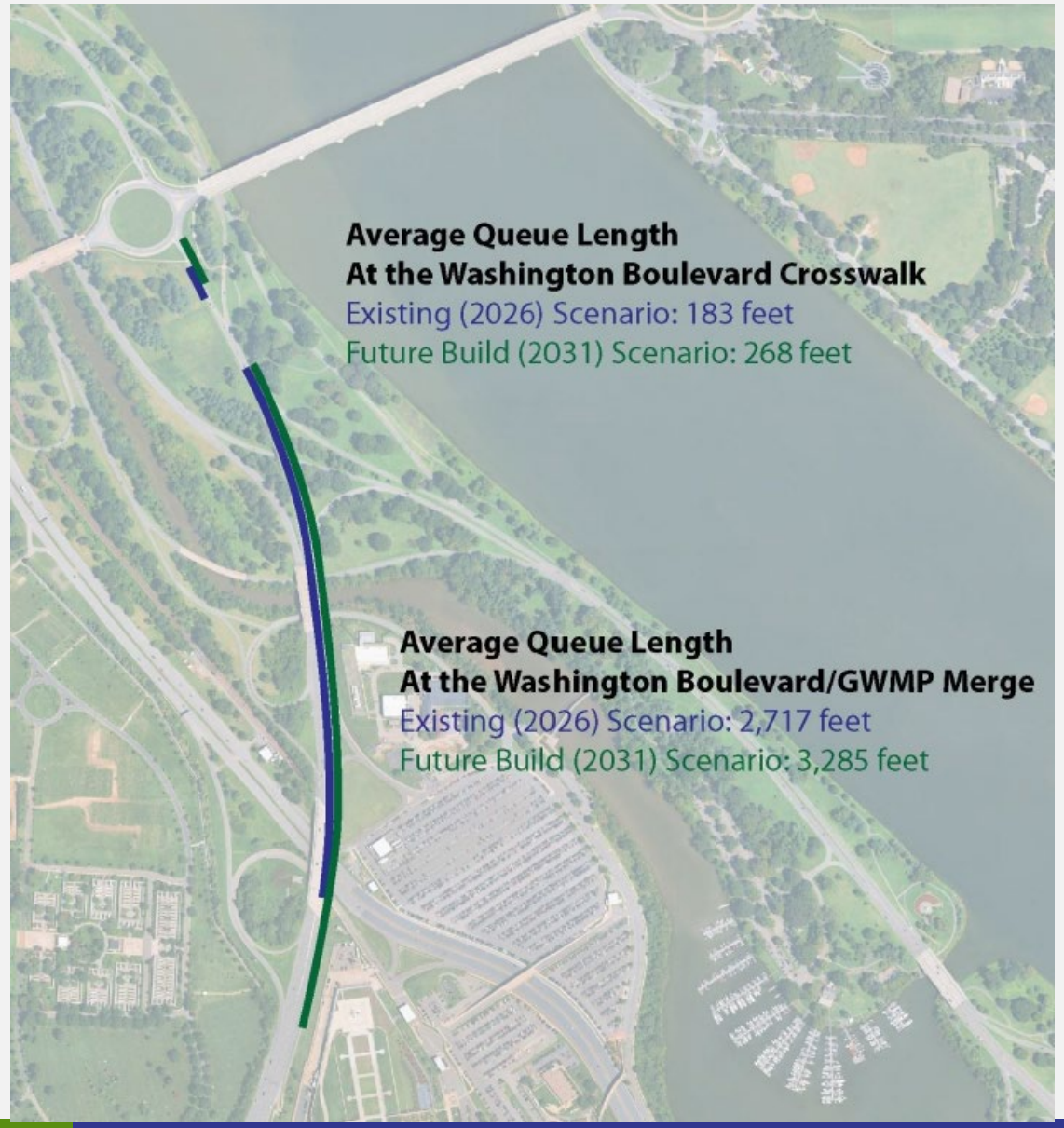
Weekday Morning Peak Hour Traffic Counts

The proposed signalized concept eliminates one approach lane serving two movements through AMC, the Washington Boulevard northbound through movement to Arlington Boulevard and the Washington Boulevard northbound left-turn movement to Memorial Avenue. The traffic volumes can detour to alternative routes as shown. The figure also shows the traffic volume expected to detour during the weekday a.m. peak hours and have been incorporated in the traffic volumes and traffic modeling analysis.

Future with Proposed Arch 2031

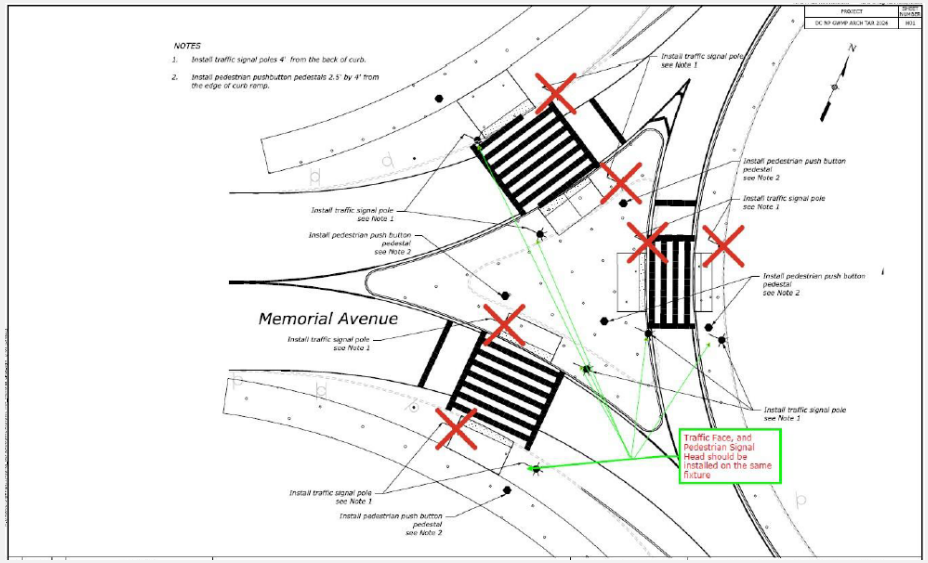


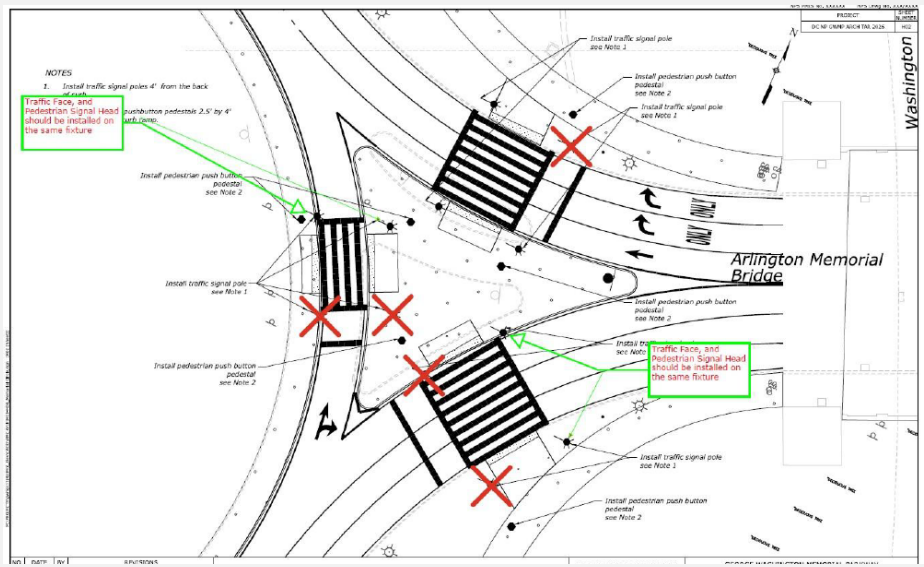
Future Queue Length - Washington Boulevard

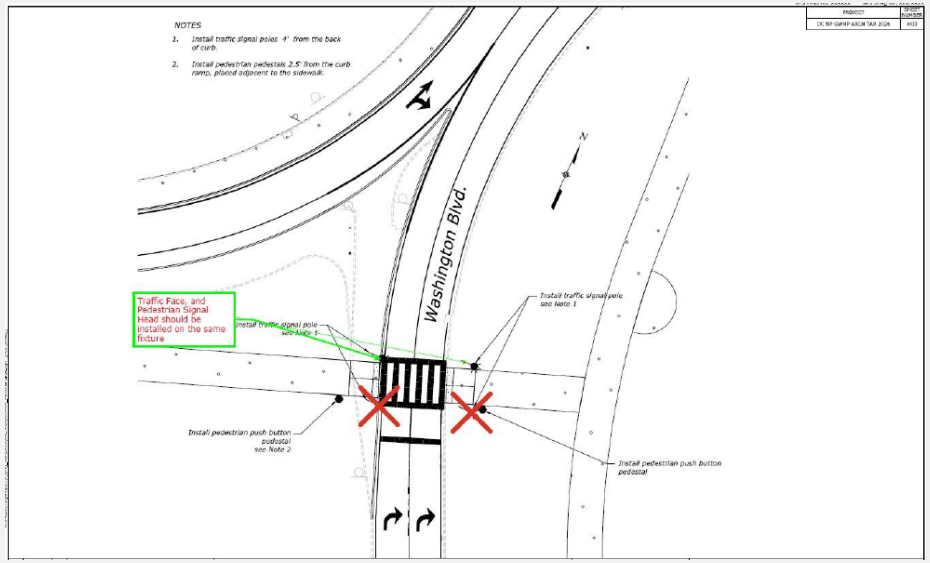


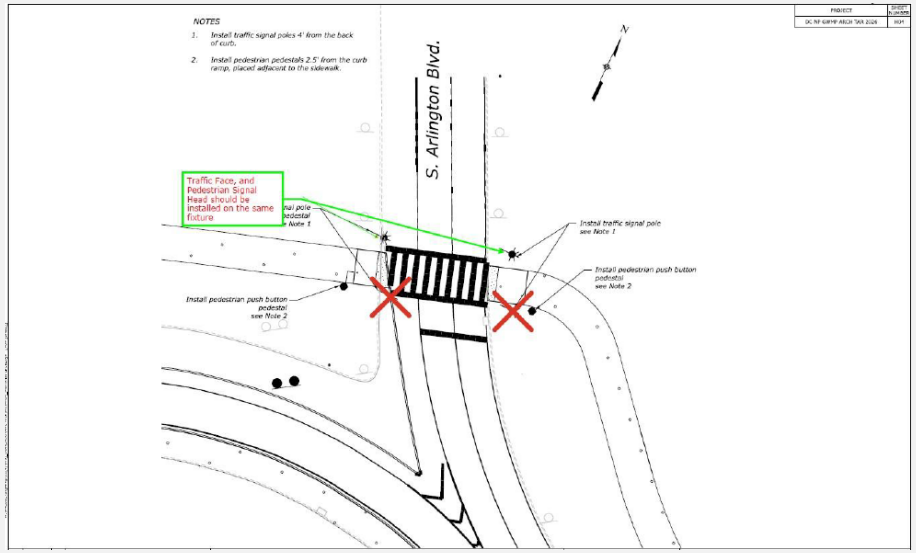
The traffic operations analysis demonstrates that during the weekday morning commuter peak period congestion originates along Washington Boulevard at the merge point with the GWMP ramp, south of AMC. The weave condition leads to an average queue length of about 2,700 feet today and is expected to maintain a length of about 3,000 feet in the future. This average queue length does not extend to the interchange with I-395, which is approximately 7,000 feet south of AMC.

Traffic Signal Updates



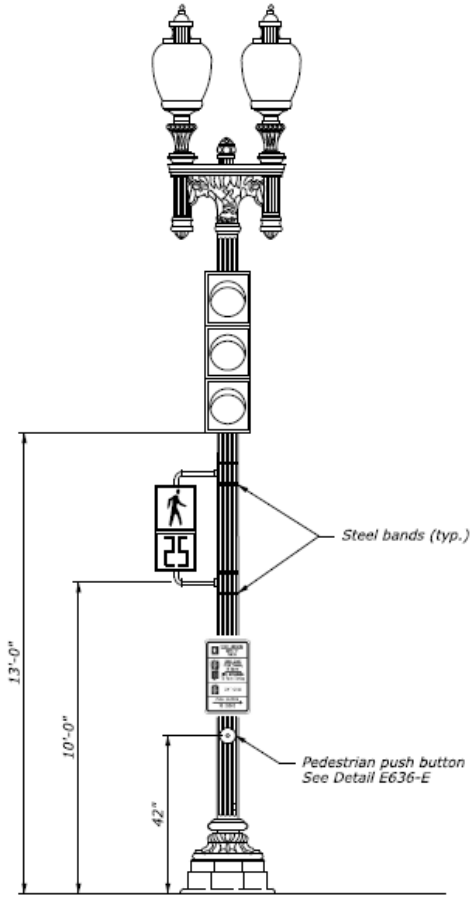




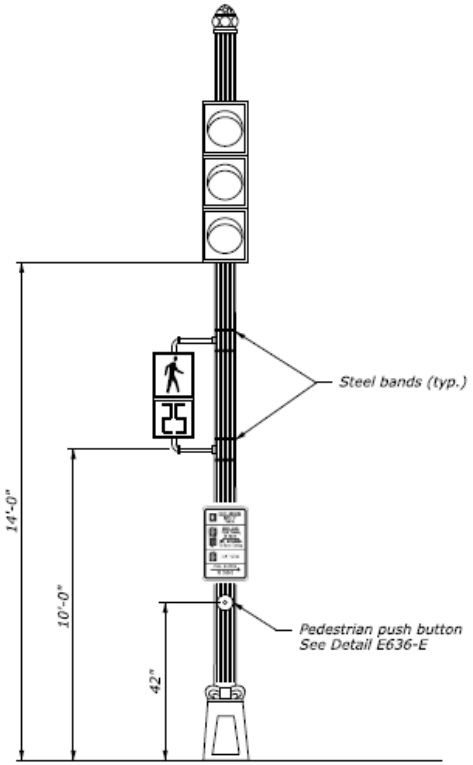


To reduce visual clutter within the landscape and provide a more representative estimate of the infrastructure required, an analysis was conducted to evaluate potential sight-distance and visibility constraints for each signal face. Based on this analysis, 15 traffic signal posts were eliminated from the preliminary design. Each signalized crosswalk will retain a minimum of two traffic signal posts and the necessary three-section vehicular signal indications, pedestrian signal indications, and accessible pedestrian push buttons.

Final Transportation Details



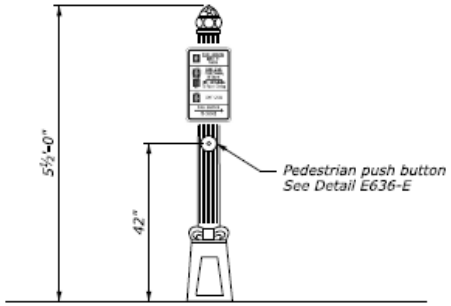
TWIN 20 STYLE LIGHTING STANDARD WITH LED RETROFIT UPGRADE



20 FOOT TALL STEEL TRAFFIC SIGNAL POLE

NOTES:

1. Mount all new steel traffic signal poles on a transformer. See Detail E636-D for transformer base details.
2. Use stainless steel strapping to affix hardware to poles, unless otherwise specified.

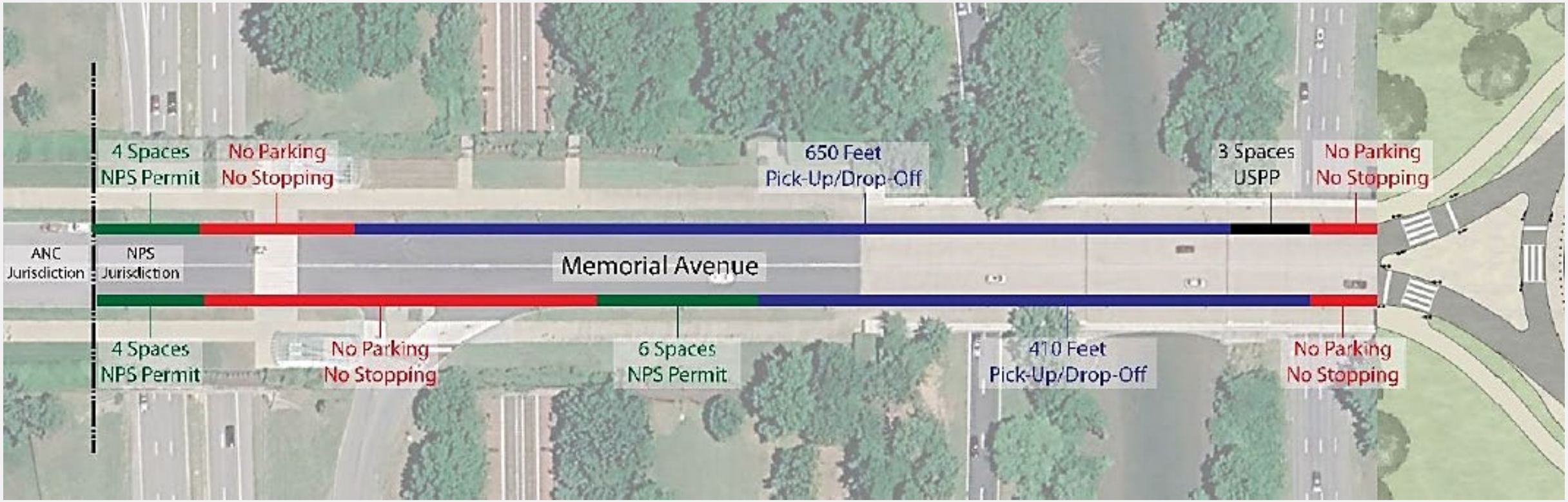


STEEL PEDESTAL POLE

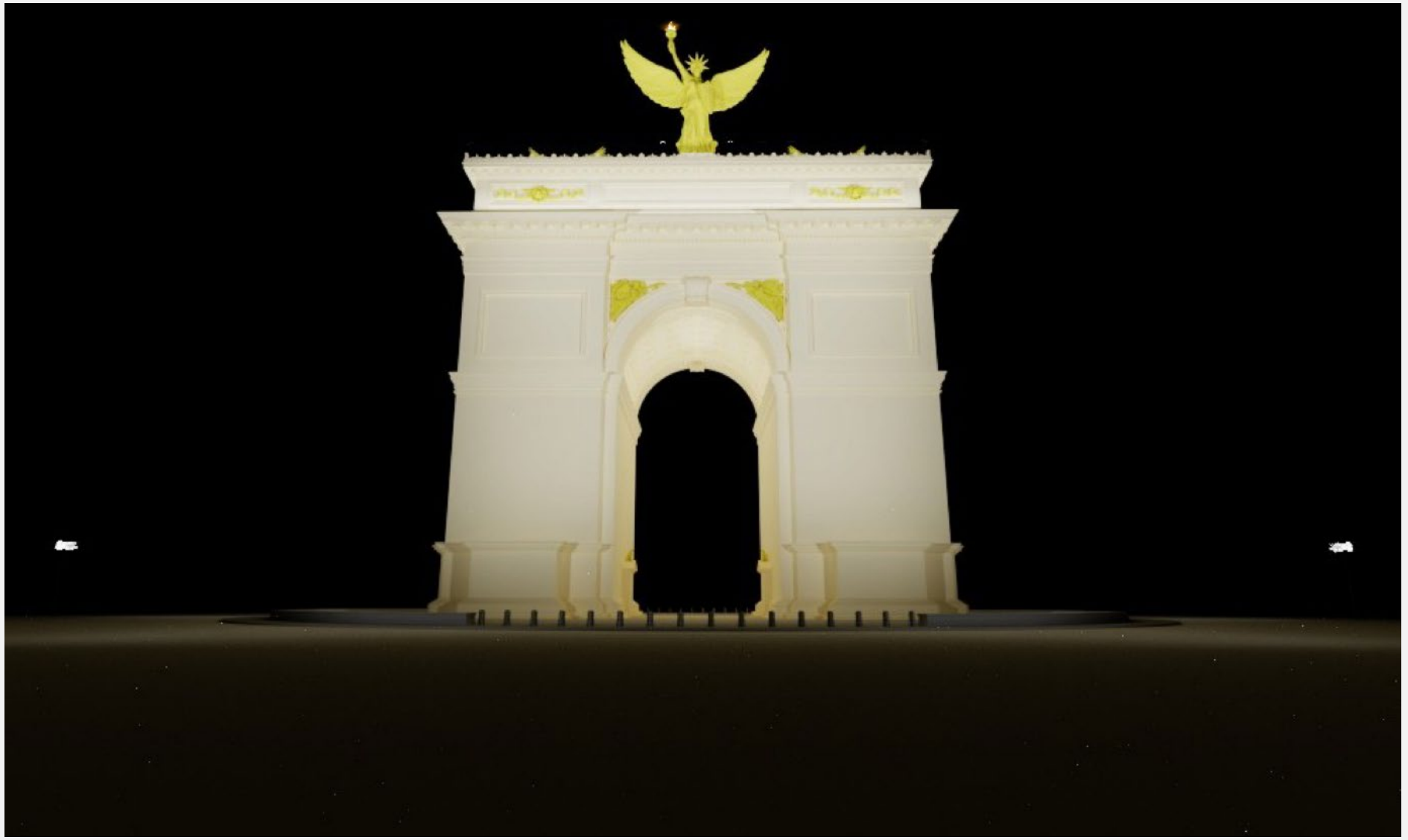
Traffic Signal Hardware Arrangement on Metal Poles

Final Curb Use Management Plan

Per the submission, memorial Avenue is approximately 60 feet wide, providing sufficient roadway width to accommodate curbside activities while maintaining two-way vehicular operations. Dedicated curbside space will support passenger pick-up and drop-off, staff parking, bus loading and unloading, and other delivery and service activities. Existing parking at ANC provides capacity for personal vehicles, while motorcoach parking and staging will continue to be accommodated primarily at ANC, with Memorial Avenue available to support overflow operations as needed. Coordination with ANC regarding parking, curbside operations, and site access will continue as the project advances.

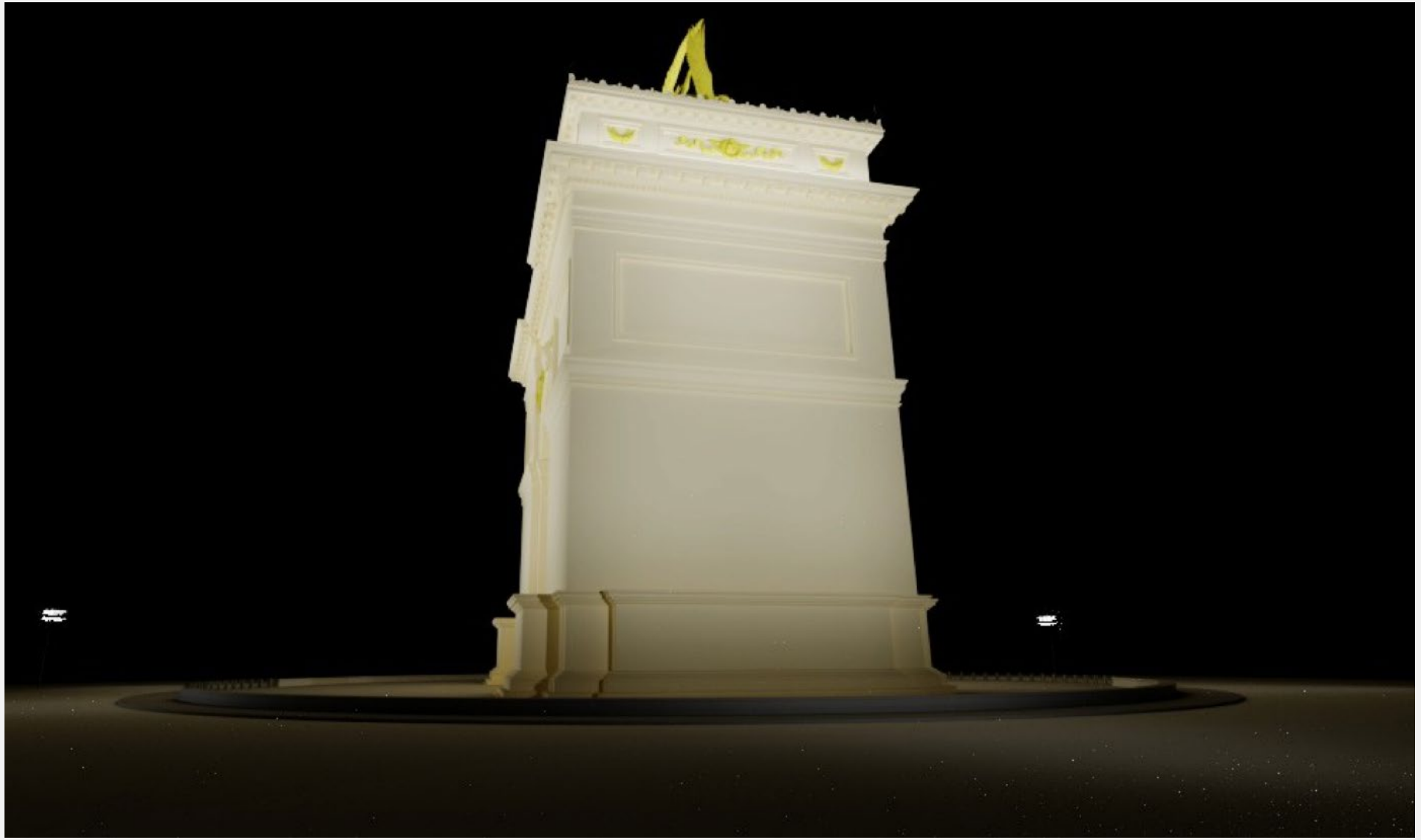


Final Lighting Rendering



According to the applicant, the proposed lighting design for the arch is intended to create a timeless nighttime presence that highlights the monument's architectural significance while maintaining visual comfort for motorists, visitors, and the surrounding environment. The design focuses on emphasizing the arch's defining architectural features, enhancing depth and dimension, and delivering a balanced, uniform visual appearance from all viewing angles.

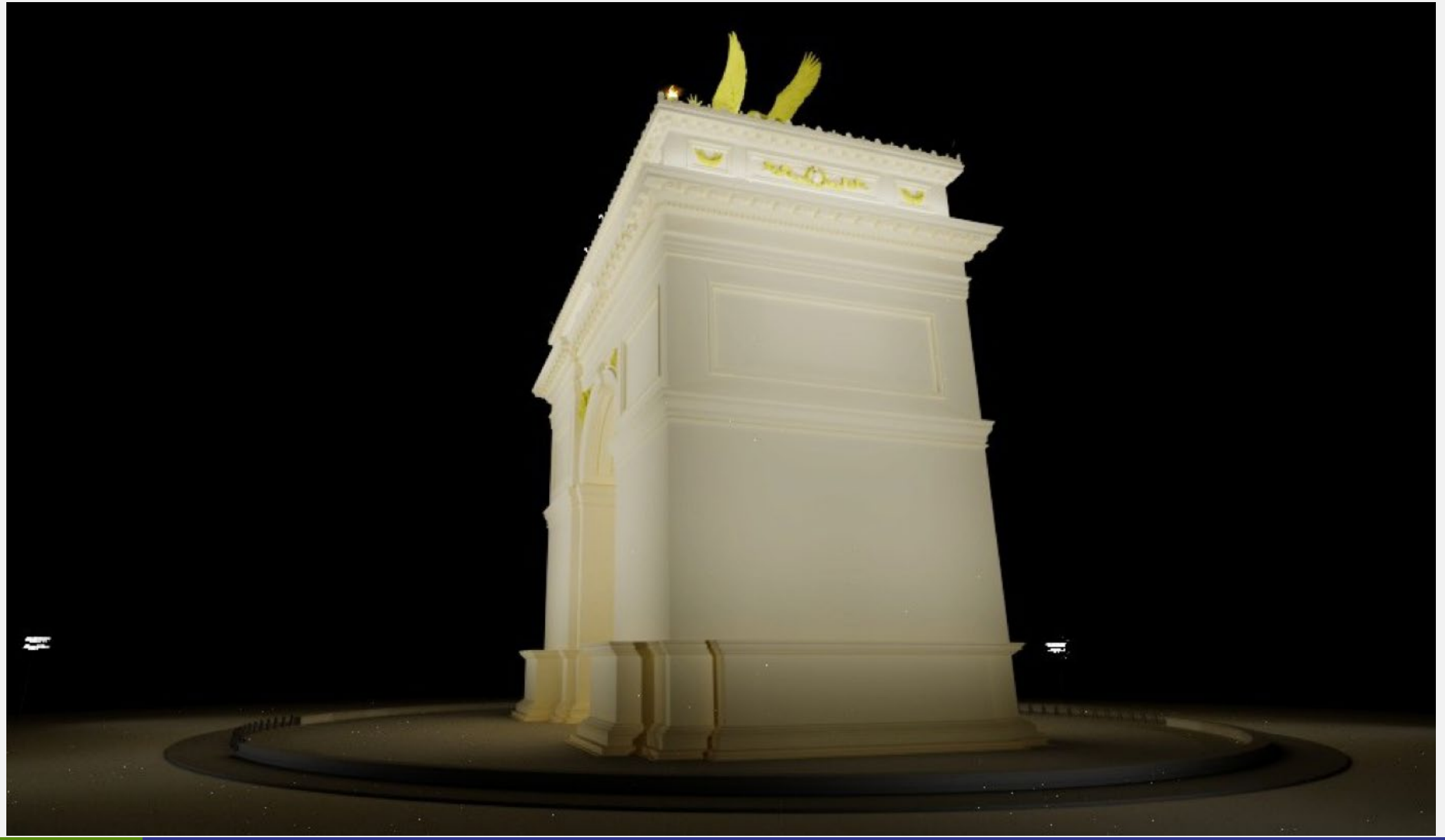
Final Lighting Rendering



Final Lighting Rendering



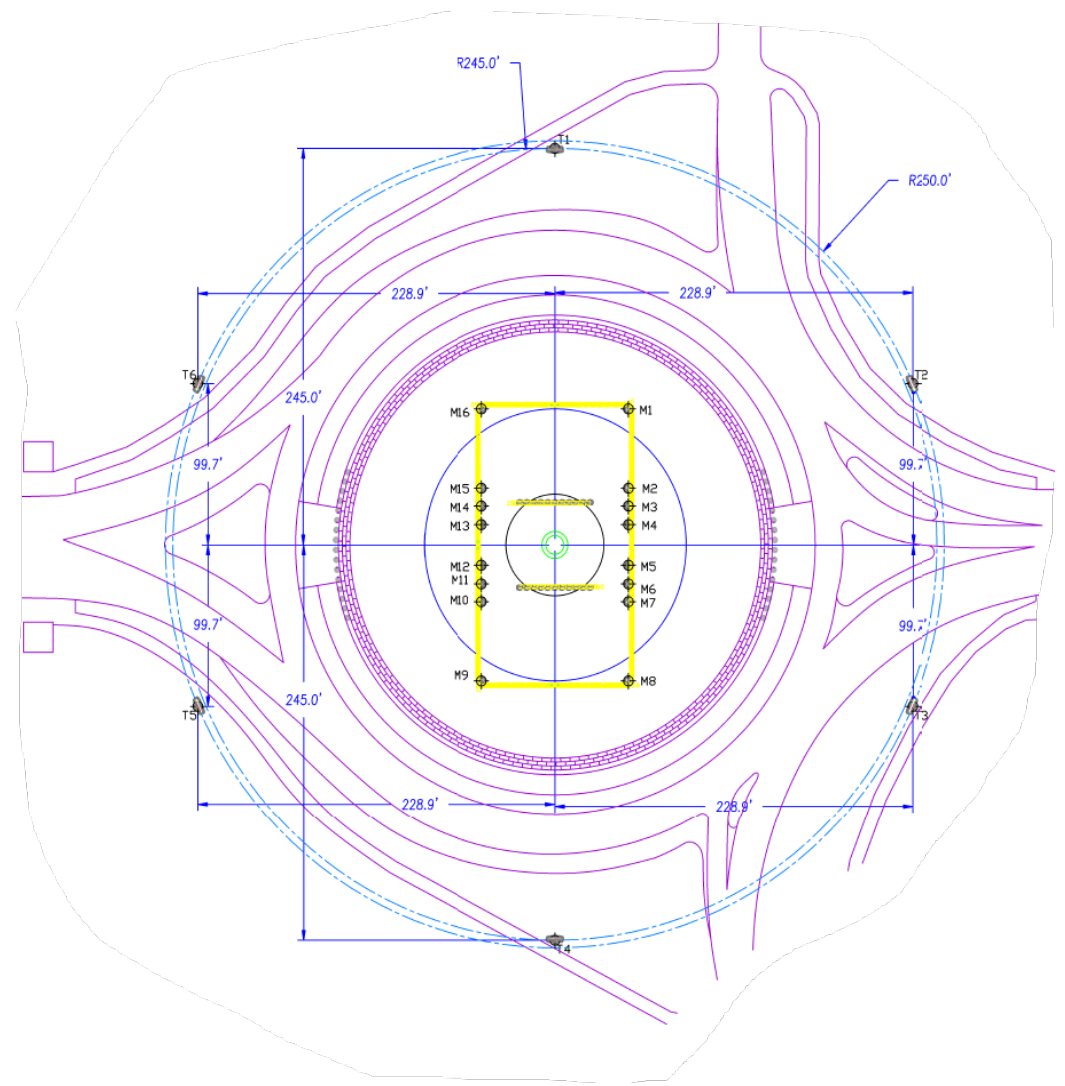
Final Lighting Rendering

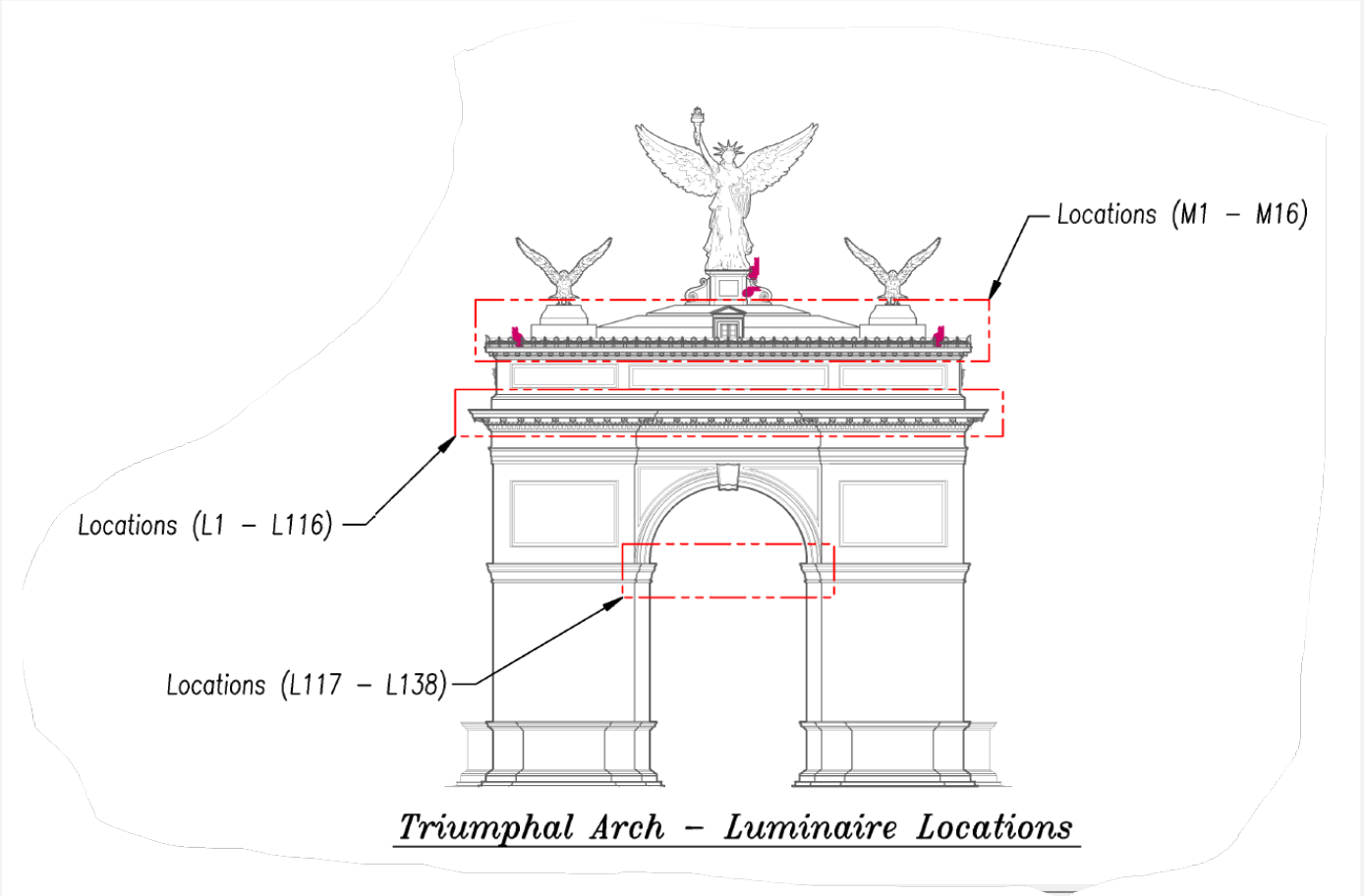


Final Lighting Rendering



Final Lighting Plan





Final FAA Lighting Plan

On September 18, 2026 the FAA provided NPS with a “DETERMINATION OF NO HAZARD TO AIR NAVIGATION” finding for the Triumphal Arch. Section 7, provides the following condition for safety lighting; “*The proposed structure should be appropriately marked/lighted with a non-standard eternal flame and continuously floodlighted by searchlight projectors installed at three or more equidistant points around the base of the structure. The searchlight projectors should provide an average illumination of at least 15 foot-candles (161.46 lux) over the top one-third of the structure, in accordance with FAA AC 70/7460-1N, Paragraph 4.5, to make it more conspicuous to airmen.*”

Conceptual Eternal Flame

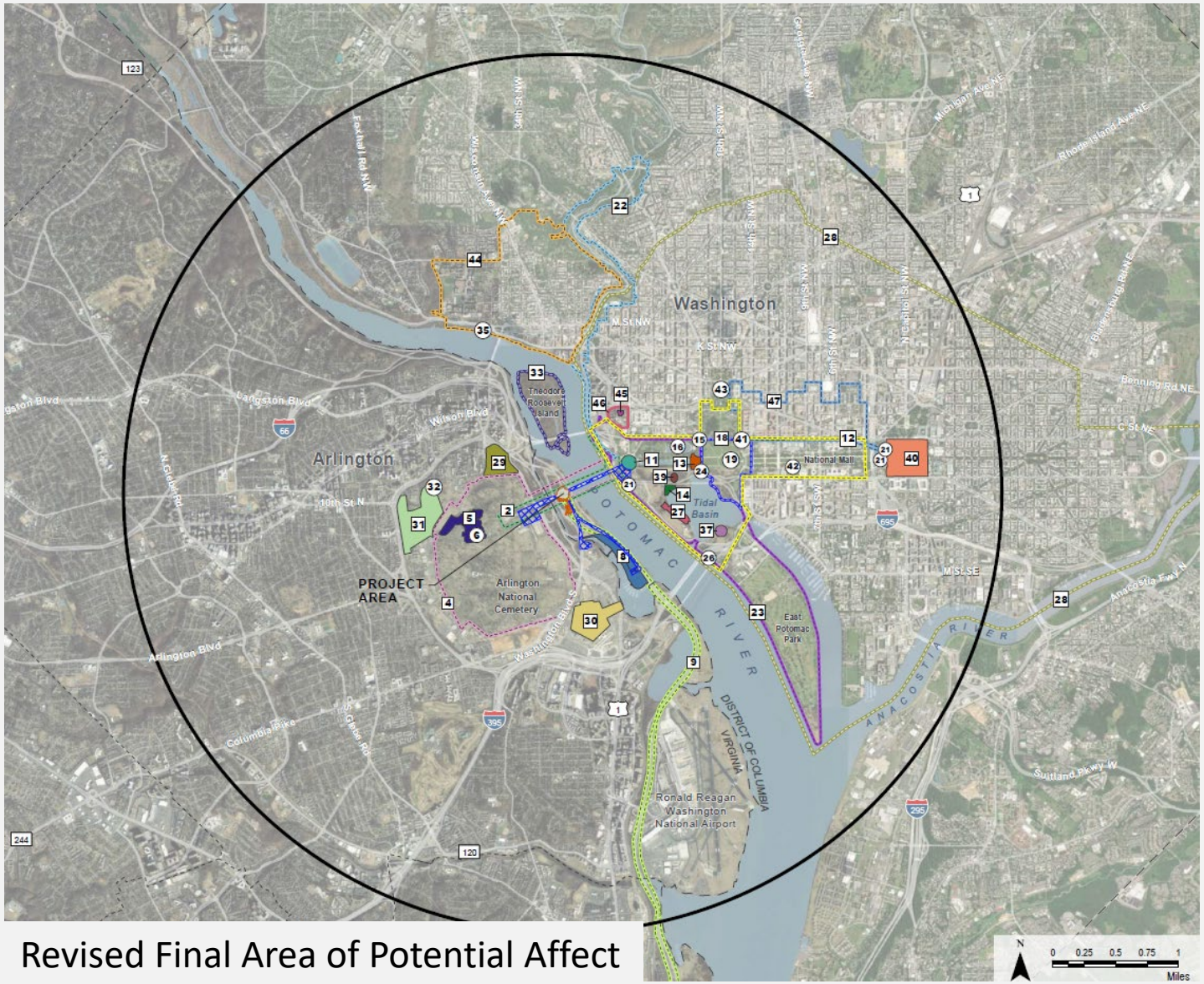


Environmental Considerations

To comply with the National Environmental Policy Act, the NPS prepared an Environmental Assessment (EA) analyzing the alternatives and evaluating the potential environmental effects associated with constructing the proposed Triumphal Arch on the George Washington Memorial Parkway. The EA was prepared in accordance with 516 DM 1, U.S. Department of the Interior, Handbook of National Environmental Policy Act Implementing Procedures, February 2026 (DOI NEPA Handbook) and its appendices, along with the National Environmental Policy Act Implementing Regulations at 43 Code of Federal Regulations (CFR) Part 46.

The Environmental Assessment was completed in October 2026 and was submitted with the design materials. The FONSI documents the NPS's determination that the proposed Triumphal Arch in Memorial Circle would not result in significant environmental impacts. The final FONSI was signed on October 9, 2026.

Historical Considerations



Revised Final Area of Potential Affect

NPS initiated the Section 106 process of the National Historic Preservation Act on June 5, 2026. NPS prepared a draft Assessment of Effects and Memorandum of Agreement on June 5th and held consulting parties meetings on June 15th and September 9th. NCPC designated NPS lead agency for Section 106.

On September 22, 2026 NPS forwarded a summary of its consultation efforts for the proposed arch to the Advisory Council on Historic Preservation (ACHP). On September 24, 2026, ACHP notified NPS and all consulting parties, including NCPC, that it had terminated consultation on the project pursuant to 36 CFR § 800.7(a)(4). ACHP held a meeting on September 29, 2026 to allow consulting parties to provide any views on this undertaking and proposed resolution of adverse effects. ACHP provided its final comments to the Secretary of Interior on October 9, 2026, and the Secretary of Interior responded, which officially concludes the Section 106 process according to the relevant regulations.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION

d. Planning and Sustainability Division

October 22, 2026

National Capital Planning Commission
Attention: Jamie Herr
401 9th Street, NW | Suite 500
Washington, DC 20004

RE: New Monumental Arch (NCPC Case # 8778)

Dear Ms. Herr:

Thank you for the opportunity to provide comments on the August 2026 Arlington Memorial Circle Transportation Access, Safety, and Operations Analysis in advance of the November 5 NCPC Hearing for the New Monumental Arch (case # 8778). The District Department of Transportation (DDOT) previously provided comments, dated June 23, 2026, and June 26, 2026 on the Arlington Memorial Circle Traffic Signal Plan, Temporary Traffic Control Plan (sheets N01 – N10 in the 30% plan set), and Draft Environmental Assessment for the New Monumental Arch. At the time, DDOT noted various deficiencies in the materials provided for review to independently assess the full breadth of impacts on the District's transportation network and whether mitigation on District facilities is necessary.

DDOT received the August 2026 Arlington Memorial Circle Transportation Access, Safety, and Operations Analysis from NCPC on October 13, 2026. DDOT would like to request additional time to provide a more detailed analysis. Specifically, DDOT would like a chance to have direct communications with the applicant and access to the Syncro/Sim Traffic files that the traffic analysis was based on. Enclosed is DDOT's review of the transportation analysis comprising 21 comments, some of which reiterate unresolved items from DDOT's earlier review in June. DDOT's current comments request additional data, justifications or bases for various assumptions, clarification of various findings, and a safe, ADA-compliant Maintenance of Traffic Plan during construction. Based on the materials made available to review on this project to date, DDOT expresses concerns regarding the safety of multimodal transportation around the Arlington Memorial Circle with the addition of a New Monumental Arch, as well as during construction.

We look forward to responses from the design team on these comments and for the ability to review further planning milestones as the design progresses. Should you have any questions, please contact Erkin Ozberk, Development Review Program Manager, at erkin.ozberk1@dc.gov or 202-409-9189.

Sincerely,

Kelsey E. Bridges

Kelsey Bridges
Associate Director, Planning and Sustainability Division

Project Name: Arlington Memorial Arch

DDOT Comments

Item	Reviewer Name	Source	Comment Date	DDOT Comment	Design Team Response	Response Date	Action	DDOT Comment	Date
1	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 2	10/19/2026	The expanded study area includes locations south and west of Memorial Circle but omits the east end of Arlington Memorial Bridge and the connecting District intersections. This omission limits DDOT's ability to evaluate network-wide impacts. The report states that "the queue on the westbound AMB… does not appear to spill back into Lincoln Memorial Circle" (Page 2). This conclusion relies on signal phasing and timing assumptions that DDOT has not reviewed or approved. Queue lengths may be longer if the proposed phasing requires						
2	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 7	10/19/2026	The Friday PM data show "zero (0) throughput" between 6:30 PM and 9:30 PM (Page 7), which is highly abnormal. Please confirm whether Arlington Memorial Bridge was closed during this period and document the cause.					
3	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 15	10/19/2026	Table 4 presents peak-month daily visitation estimates of 2,000, 5,800, and 22,400 people, yet Table 5 shows only 0, 40, and 80 vehicle trips in the AM, PM, and Saturday peak hours (Page 15). The report does not demonstrate how these volumes were derived or which visitation scenario they represent. Please provide: Hourly visitor profiles for each scenario Mode share and vehicle occupancy assumptions Distinction between visitors already in the area vs. new trips or rerouted trips Justification for the zero-AM assumption and the 50/50 arrival–departure split					
4	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 15, 16, 17	10/19/2026	The proposed signalized concept removes the Washington Boulevard northbound through movement to Arlington Boulevard and the northbound left-turn movement to Memorial Avenue (Pages 15–17). The report does not explain the rationale, feasibility, or enforcement mechanism for eliminating these movements. The site plan and signal plan still depict the approach lane, and without Synchro files, DDOT cannot verify the proposed phasing. Removal of movements cannot be justified solely by improved operational results. Moreover, in Figure 15, there is no easily accessible alternative route for the northbound left-turn traffic originating from GWMP.					
5	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 20	10/19/2026	The report states that the signal operation "presents the maximum number of pedestrian phases called to the signal" (Page 20). Please clarify whether this refers to pedestrian recall, maximum service frequency, or another modeling assumption. DDOT cannot verify results without reviewing the Synchro files.					
6	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 21	10/19/2026	The report asserts that the 95th percentile queue "will likely only occur for a few minutes during the entire peak hour" (Page 21). This cannot be inferred without reporting upstream blockage frequency and duration. In extreme cases, queues may persist for the full hour, making the 95th percentile queue equivalent to the average and maximum queue.					
7	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 22-24	10/19/2026	Tables 7–9 show delay and queues on several free-flow approaches under Existing Conditions (Pages 22–24). Please explain the source of delay for these movements.					
8	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 22	10/19/2026	The delay at Int #2 Washington Blvd at GWMP Ramp Merge shows significant drop in Future Baseline scenario compared to Existing Condition, despite the assumed traffic growth. Please explain.					
9	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 22	10/19/2026	Under Future Build scenario, the delay and LOS for Ramp NB L movement at #Int 3 Memorial Ave at Richmond Hwy Off-Ramp increased significantly compared to Existing and Baseline. Please explain the contributing factors.					
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12	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 27	10/19/2026	Please evaluate each pedestrian waiting area and crossing separately, using net usable space after poles, bollards, accessible routes, and circulation paths are deducted.					

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Project Name: Arlington Memorial Arch

DDOT Comments

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Wednesday, October 28, 2026

Kelsey Bridges
Associate Director, Planning and Sustainability Division
Department of Transportation (DDOT)
Government of the District of Columbia

RE: National Park Service (NPS) Responses to the District Department of Transportation (DDOT) Comments dated October 22, 2026, on the Transportation Access, Safety, and Operations Analysis for Triumphal Arch at Arlington Memorial Circle

Dear Kelsey Bridges:

Thank you for your agency's review and associated comments on the Transportation Access, Safety, and Operations Analysis. Please kindly note that some comments that were submitted appear to have been inadvertently truncated when the spreadsheet was exported to PDF. The responses provided below address the available comment contents to the extent possible. The National Park Service (NPS) appreciates your input and remains committed to continued coordination throughout the project.

Comment #1 | PDF Page/Sheet: 2

- **Comment:** "The expanded study area includes locations south and west of Memorial Circle but omits the east end of Arlington Memorial Bridge and the connecting District intersections. This omission limits DDOT's ability to evaluate network-wide impacts.

  The report states that 'the queue on the westbound AMB… does not appear to spill back into Lincoln Memorial Circle' (Page 2). This conclusion relies on signal phasing and timing assumptions that DDOT has not reviewed or approved. Queue lengths may be longer if the proposed phasing requires [remaining text clipped in source]."
- **Response:** NPS does not anticipate impacts to DDOT roadways at this time but remains committed to continued coordination through the signal permit process.

Comment #2 | PDF Page/Sheet: 7

- **Comment:** "The Friday PM data show 'zero (0) throughput' between 6:30 PM and 9:30 PM (Page 7), which is highly abnormal. Please confirm whether Arlington Memorial Bridge was closed during this period and document the cause."
- **Response:** Arlington Memorial Bridge was closed to public vehicular traffic on Friday, June 12, 2026 from approximately 6:30 PM to 11:59 PM for Freedom 250th events. Please note that volumes in the late evening were not the basis for any modeling.

Comment #3 | PDF Page/Sheet: 15

- **Comment:** "Table 4 presents peak-month daily visitation estimates of 2,000, 5,800, and 22,400 people, yet Table 5 shows only 0, 40, and 80 vehicle trips in the AM, PM, and Saturday peak hours (Page 15). The report does not demonstrate how these volumes were derived or which visitation scenario they represent.

  Please provide:
  - Hourly visitor profiles for each scenario
  - Mode share and vehicle occupancy assumptions

    - Distinction between visitors already in the area vs. new trips or rerouted trips
    - Justification for the zero-AM assumption and the 50/50 arrival–departure split"
- **Response:** Several potential growth scenarios were presented to evaluate signal operations under conservative, high-visitation conditions. To account for high pedestrian demand, the signal analysis assumed pedestrian recall during each applicable signal phase, providing pedestrian service every cycle regardless of whether a crossing request was registered. Meanwhile, the geometric design accommodates pedestrian volumes associated with the high-visitation scenario through sufficient crosswalk widths and pedestrian queuing capacity. Pedestrian level of service calculations were conducted to ensure that even high volumes of pedestrians could be accommodated during each phase.

  The vehicle demand estimates presented in Table 5 are additional vehicle trips to the area, generated by the Triumphal Arch, not existing trips (e.g., those visiting Arlington National Cemetery). These additional trips assume that access to the site will operate similarly to other nearby monuments, with limited ticketed entry helping to manage demand. Most visitors are also expected to arrive at an off-site location and continue to the site on foot or by bicycle, visiting as one stop within a broader National Mall experience rather than as a standalone destination.

Comment #4 | PDF Page/Sheet: 15, 16, 17

- **Comment:** "The proposed signalized concept removes the Washington Boulevard northbound through movement to Arlington Boulevard and the northbound left-turn movement to Memorial Avenue (Pages 15–17). The report does not explain the rationale, feasibility, or enforcement mechanism for eliminating these movements.

  The site plan and signal plan still depict the approach lane, and without Synchro files, DDOT cannot verify the proposed phasing. Removal of movements cannot be justified solely by improved operational results.

  Moreover, in Figure 15, there is no easily accessible alternative route for the northbound left turn traffic originating from GWMP."
- **Response:** The northbound through movement from Washington Boulevard serves extremely low traffic demand. Eliminating the movement allows the high-volume movements from the circle toward eastbound Arlington Memorial Bridge and northbound Washington Boulevard to Arlington Memorial Bridge to operate concurrently, improving intersection efficiency. In addition to operational benefits, restricting the movement also eliminates a vehicle conflict point, while the associated lane removal shortens the pedestrian crossing distance and reduces pedestrian exposure time. It's anticipated that northbound through traffic destined for Arlington Boulevard will use the bypass beneath Arlington Memorial Bridge as an alternative route. Northbound through traffic destined for Arlington National Cemetery is expected to use nearby alternative routes, as shown in Figure 15, with diverted traffic volumes not anticipated to materially affect traffic operations. During each of the three analysis periods, 40 or fewer vehicles were expected to require diversion due to the elimination of this movement. Vertical channelization elements integrated into the surrounding landscape design are expected to prevent this movement. These elements will be further refined as the design progresses.

Comment #5 | PDF Page/Sheet: 20

- **Comment:** "The report states that the signal operation 'presents the maximum number of pedestrian phases called to the signal' (Page 20). Please clarify whether this refers to pedestrian recall, maximum service frequency, or another modeling assumption. DDOT cannot verify results without reviewing the Synchro files."
- **Response:** The signal analysis assumed pedestrian recall was enabled for all modeled pedestrian phases, providing pedestrian service every cycle regardless of whether a crossing request was registered. This assumption was used to evaluate traffic operations under a high-visitation pedestrian scenario.

Comment #6 | PDF Page/Sheet: 21

- **Comment:** "The report asserts that the 95th percentile queue 'will likely only occur for a few minutes during the entire peak hour' (Page 21). This cannot be inferred without reporting upstream blockage frequency and duration. In extreme cases, queues may persist for the full hour, making the 95th percentile queue equivalent to the average and maximum queue."
- **Response:** The study team acknowledges that queuing may persist beyond the anticipated duration under certain operating conditions; however, the associated queue lengths are not expected to extend to upstream intersections or obstruct upstream traffic movements. This consideration will inform subsequent refinements to the operational analysis as the design progresses.

Comment #7 | PDF Page/Sheet: 22–24

- **Comment:** "Tables 7–9 show delay and queues on several free-flow approaches under Existing Conditions (Pages 22–24). Please explain the source of delay for these movements."
- **Response:** The minor delays indicated in Tables 7-9 on several free-flow approaches are attributable to speed reductions associated with turning maneuvers and associated vehicle interactions. Vehicles are expected to operate at these approaches without stopping, but they may make minor speed adjustments. These speed adjustments result in limited delay, with operations remaining at LOS A.

Comment #8 | PDF Page/Sheet: 22

- **Comment:** "The delay at Int #2 Washington Blvd at GWMP Ramp Merge shows significant drop in Future Baseline scenario compared to Existing Condition, despite the assumed traffic growth. Please explain."
- **Response:** The improvement in the reported MOEs reflects variability between SimTraffic simulation runs rather than an anticipated improvement in future traffic conditions. The simulation uses random seeds to represent variations in vehicle arrivals and driver behavior, which can produce modest differences in results even under similar operating conditions.

Comment #9 | PDF Page/Sheet: 22

- **Comment:** "Under Future Build scenario, the delay and LOS for Ramp NB L movement at #Int 3 Memorial Ave at Richmond Hwy Off-Ramp increased significantly compared to Existing and Baseline. Please explain the contributing factors."
- **Response:** Northbound left-turn delay increases by approximately 30 seconds during the AM peak period, with no increase during the PM or Saturday analysis periods. This increase is primarily attributable to the modeling assumption that all traffic diverted by the elimination of the northbound through/left-turn movement from Washington Boulevard at AMC would reroute to Richmond Highway.

Comment #10 | PDF Page/Sheet: 22

- **Comment:** "Eastbound queues at Int #1e spill back into Int #3 during both AM and PM peaks (Page 22). The northbound right-turn movement at Int #3 carries heavy volumes, and spillback would prevent discharge, causing additional congestion on Richmond Hwy and GWMP. The current model does not seem to capture this interaction and the potential impact."
- **Response:** The SimTraffic model accounts for queue spillback from the eastbound approach at Intersection #1e into Intersection #3. The northbound right-turn movement at Intersection #3 exhibits average queue lengths of 121 feet and 51 feet and 95th-percentile queue lengths of 443 feet and 272 feet during the AM and PM peak periods, respectively. Although spillback from Intersection #1e may intermittently affect operations at Intersection #3, the resulting queues are not expected to disrupt traffic operations along northbound Richmond Highway or southbound GWMP.

Comment #11 | PDF Page/Sheet: 22

- **Comment:** "The existing delays and queues at Int #5 - Richmond Hwy Ramp at GWMP Ramp does not appear to match or calibrated with the real world condition. Google Typical Traffic shows congestion for both AM and PM peaks.

  Please share the Synchro/SimTraffic models and explain how the model represents the weaving and lane changes at this intersection, and explain if Synchro/SimTraffic is an adequate tool that can represent a critical interaction like this.

  Same for Future Baseline and Future Build scenarios."

- **Response:** Synchro/SimTraffic was selected as an appropriate tool for this stage of the analysis in order to evaluate the proposed lane configurations, signal operations, delay, and queuing, particularly due to the interactions between closely spaced intersections. The proposed design does not introduce yield-controlled interactions, new weaving conditions, or substantial changes to traffic within existing weaving operations that would be appropriate for the more detailed behavioral modeling available in VISSIM. However, although the analysis did not identify substantial operational impacts to the existing merge of the GWMP and Richmond Highway ramps approaching Memorial Ave, NPS recognizes this area as a location where VISSIM could provide additional analytical value and will consider its use for future analyses.

Comment #12 | PDF Page/Sheet: 27

- **Comment:** "Please evaluate each pedestrian waiting area and crossing separately, using net usable space after poles, bollards, accessible routes, and circulation paths are deducted."
- **Response:** The detailed geometry of individual pedestrian waiting areas and crossings will be refined during subsequent design phases, accounting for bollard placement, accessible route requirements, and other physical constraints that affect the effective width and usable area available for pedestrian queuing and crossing.

Comment #13 | PDF Page/Sheet: 27

- **Comment:** "The calculated pedestrian delay appears to be per-crossing estimates, not a complete route evaluation. Please clarify whether delays reflect single-stage or multi-stage crossings."
- **Response:** The calculated pedestrian crossing delay provided in the analysis is a per-crossing estimate. As design development progresses, NPS will evaluate strategies to minimize cumulative pedestrian delay along pedestrian routes to the extent feasible. This evaluation may include a multi-

stage pedestrian delay analysis to quantify cumulative delay across sequential crossings and inform signal phasing and coordination.

Comment #14 | PDF Page/Sheet: 28

- **Comment:** "In Figure 21 MOT for the two-way circulation, there would not be space for the westbound vehicles to queue at the proposed temporary pedestrian crossing, when there is a pedestrian call placed. The inner lane for the westbound approach has to be thru only while the outer lane should be marked as right turn only."
- **Response:** NPS intends to shift the proposed crossing farther west during subsequent design iterations to provide sufficient queue storage for westbound vehicles without obstructing right-turn movements.

Comment #15 | PDF Page/Sheet: 12

- **Comment:** "Table 2 uses 11:15 a.m.-12:15 p.m. and noon-1:00 p.m. as two of its four hours. These overlap by 15 minutes, so the table does not document four distinct hours as presented. MUTCD Section 4C.01, paragraph 15, specifies nonoverlapping separate hours.

  Correct Table 3 title to reference the south crosswalk at Washington [remaining text clipped in source]."

- **Response:** The second period should read "12:15 PM to 1:15 PM" and will be corrected in any future iterations of the analysis.

Comment #16 | PDF Page/Sheet: 31

- **Comment:** "The availability of a 60-foot roadway and an assertion of ANC parking capacity do not establish that the proposed operation can accommodate peak demand without blocking travel lanes, accessible loading, pedestrian routes, or emergency access.

  The PUDO maneuvers can cause friction and thus impact the capacity. It's unclear how the models capture such effect."

- **Response:** Different demand scenarios were considered to ensure signal operations were evaluated under a conservative, high-visitation condition. Pick-up and drop-off facilities and adjacent roadways are not sized to accommodate the maximum theoretical demand, as doing so could require disproportionate curb space and the creation of parking lots for infrequent surges in activity. Instead, curbside activity considers practical operating capacity, with occasional demand surges addressed through operational management. However, NPS recognizes that modeling the weaving and merging interactions associated with curbside activity using a tool such as VISSIM could provide additional analytical value and will consider its use in future analyses.

Comment #17 | PDF Page/Sheet: 28

- **Comment:** "The temporary two-way circulation layout needs to be proved to be feasible using AutoTurn analysis, considering the truck swept paths, emergency response, etc."
- **Response:** NPS will incorporate vehicle swept-path analysis using AutoTURN into subsequent design iterations to verify the feasibility of the temporary two-way circulation layout for applicable design vehicles, including trucks and emergency response vehicles. The layout will be refined as needed to accommodate turning maneuvers, vehicle clearance requirements, and emergency access.

ARLINGTON VIRGINIA

DEPARTMENT OF ENVIRONMENTAL SERVICES
Division of Transportation

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October 22, 2026
SENT VIA EMAIL: jamie.herr@ncpc.gov

Jamie E. Herr, AICP
Community Planner, Current Planning Division
National Capital Planning Commission
401 9th Street, NW
Washington, DC 20004

RE: Review of Transportation Access, Safety, and Operations Analysis for Triumphal Arch at Arlington Memorial Circle

Dear Jamie Herr:

Thank you for your notification dated October 13, 2026, regarding the proposed Triumphal Arch at Arlington Memorial Circle (AMC) and request for Arlington County comments on the applicant's Transportation Access, Safety, and Operations Analysis. We acknowledge the feedback deadline of October 22, 2026, and note that the requested nine-day review period is significantly shorter than the typical 60-day review period provided by the National Capital Planning Commission (NCPC) for projects impacting Arlington County. As a result, this compressed review period will negatively impact the County's ability to provide a comprehensive response to the proposed project and assessment of the transportation impacts to Arlington County.

In this letter, we provide Arlington County staff feedback regarding the transportation analysis document provided on October 13, 2026, for the proposed Triumphal Arch at Arlington Memorial Circle project. The AMC road network connects to Arlington County, and changes to this site will impact on Arlington's transportation network. Arlington County Division of Transportation (DOT) reviewed the transportation analysis for the proposed project and identified concerns related to safety and operations for all modes, analysis methodology, maintenance of traffic, and multimodal design, with detailed comments provided in Attachment 1.

- *Multimodal Safety and Operations:* The analysis focuses primarily on pedestrian and vehicle operations and does not include a similar level of detail for bicycles, nor does it include a robust safety analysis. Furthermore, it lacks a complete assessment of broader circulation patterns for all modes or an analysis of existing sidewalk and trail widths to determine the additional space needed to safely accommodate increased pedestrian, bicycle, and micromobility volumes.
    - The analysis lacks detailed information related to pedestrians, bicycles, and micromobility circulation to, through, and around the edges of the circle. AMC provides a critical regional connection between the Mount Vernon Trail, the Route 110 Trail, Arlington Memorial Bridge, and the broader regional trail network and key destinations, including Arlington National Cemetery, Rosslyn, and Washington, DC.
    - The analysis includes a more detailed assessment of pedestrian crossing impacts, including Pedestrian Level of Service, but does not include an equivalent assessment for bicycle traffic despite bicycles accounting for 40-50% of multimodal

users. These users need to be considered alongside pedestrians in the crossing analysis. The sidewalks and trails adjacent to the proposed crossings likewise should be analyzed to understand the space needed to accommodate the combination of 1) projected volumes of pedestrians and bicyclists waiting to cross and 2) projected pedestrian and bicycle through volumes.
    - The report does not include a safety analysis of existing and future safety conditions, which is critical given the volume of pedestrian and bicyclist demand resulting from this project.

- *Traffic Safety and Operations:*
    - The report indicates that there are major operational issues to the south of the site where the George Washington Memorial Parkway (GWMP) and Washington Boulevard merge. The report claims that the impacts from the project do not reach this area, but in reality, the delays and queuing at the weave are essentially metering traffic into the study area, which means the demand at the circle is underestimated. There are no planned improvements or mitigations to this condition despite the projected increase in pedestrian and vehicular volumes. Unless this condition is improved, the results of the analysis artificially inflate the safety and operations at AMC.
    - County comments note additional operational and safety concerns with the GWMP/Washington Boulevard merge area, as future conditions may worsen queueing and congestion.
    - The analysis identifies curbside space for pick-up and drop-off (PUDO) along Memorial Avenue but does not assess the level of PUDO demand expected and whether the proposed supply is sufficient to meet this demand. Increased PUDO activity that is not accommodated along the curb will spill over into adjacent street space, creating safety and operations issues for all modes. Given the anticipated demand in traffic, a transportation management plan should be developed.
    - A safety analysis of existing and future safety conditions is not provided. This is critical given the numerous weaves and merges on roadways surrounding AMC. The analysis does not address the crash hotspots that were identified in the Memorial Circle Safety Improvements Environmental Assessment dated November 2018.

- *Traffic Analysis Methodology:*
    - The County continues to recommend that the analysis include more robust multimodal traffic analysis tools, such as VISSIM. More detailed traffic analysis is needed to fully understand how AMC, the proposed signalization, bike/pedestrian crossings, and travel lane changes would operate for all modes. The tools used for the analysis – Synchro and SimTraffic – do not include sufficient level of detail to assess these impacts.
    - The 2031 buildout year should be extended to a longer planning horizon that incorporates long-range regional growth, land use changes, and transportation network improvements as part of the analysis.

- *Maintenance of Traffic (MOT) During Construction:*
    - The temporary traffic closures and detours described during construction will have regional traffic impacts that need to be considered beyond the immediate

work area. A broader detour and circulation plan is needed to understand how regional traffic will be redirected around and outside of the work area and the traffic impacts of those detours on parallel roadways.
    - The MOT does not adequately accommodate detours for both pedestrians and bicyclists. Detours need to be sufficiently wide, clearly signed for all modes, and as direct as possible to support two-way multimodal travel.

- *Multimodal Design:* The estimated increases in pedestrian and bicycle volumes require sufficiently wide facilities, including the adjacent sidewalks and trails leading to and through the study area, to safely accommodate a high volume of two-way pedestrian, bicycle, and micromobility traffic with a mixing of modes and travel speeds.
    - The current design does not adequately accommodate future demand for projected growth from approximately 1,400 current daily pedestrian and bicycle users to as many as 22,400 total daily users.
    - Based on these volumes, the design needs to include more space on adjacent sidewalks and trails to accommodate pedestrian crowding and queueing at signals and minimize conflicts with moving two-way pedestrian, bicycle, and micromobility traffic.
    - Pedestrian and bicycle access routes between the project area and nearby Metro station entrances need to be factored into the analysis and considered for improvements to sufficiently accommodate increased volume.

In general, the analysis does not sufficiently address operational and safety concerns that will affect all modes of travel as well as public safety services during and after construction. Thank you again for including us in this process.

Sincerely,

Dan Nabors, P.E.
Director, Division of Transportation
Arlington County Department of Environmental Services

Attachment 1

CC: Mark Schwartz, County Manager
Shannon Flanagan-Watson, Deputy County Manager
Michelle Cowan, Deputy County Manager
Greg Emanuel, Chief Environmental Officer, Department of Environmental Services (DES)
Jane Rudolph, Director, Department of Parks and Recreation (DPR)
Erik Beach, Parks Planning Division Chief, DPR
Samia Byrd, Director, Department of Community Planning, Housing and Development (CPHD)
Anthony Fusarelli, Jr., Planning Division Chief, CPHD
Chikwe Njoku, Neighborhood Services Division Chief, CPHD
Lorin Farris, Historic Preservation Section Supervisor, CPHD
Jennifer Smith, Comprehensive Planning Manager, CPHD
Matt Ladd, Comprehensive Planning Section Supervisor, CPHD

Arlington County Division of Transportation (DOT) Comments

Triumphal Arch at Arlington Memorial Circle			
Transportation Access, Safety, and Operations Analysis Comments from Arlington County			
Comment Number	PDF Page #	Sheet #	Comment
1	1		The report should include pedestrian, bicycle and micromobility circulation improvements around the Circle. The existing network around the circle is an importation bicycle/micromobility connection from the MVT to Washington D.C. Arlington National Cemetery, Rosslyn and Points South.
2	1		Bicycle counts should be included in the report early with the pedestrian counts
3	12		Report indicates an increase in pedestrian and bicycle arrivals to ANC and future memorial site from 1400 per day, existing, up to 22,400 per day, future. Bicycle, Scooter, and Capital Bikeshare parking/docking stations should be provided to accommodate the projected increase in visitors by bicycle, scooter and shared micromobility. Bicycle/Scooter/Bikeshare stations provided with the ANC Entry Area Corridor Project would be insufficient. Providing designated parking spaces around Metro Rail will ensure that more people are able to arrive by other modes than automobile. Providing designated bicycle and micromobility parking spaces will encourage people to park outside of the memorial space and prevent clutter/unwanted parking under the Arch.
4	12		No mention of improvements to existing trails such as widening to accommodate existing and projected increases to walking and biking within the Study.
5	12		The Study does not provide Bicyclist Level of Service and delay calculations despite the notated projected increases to biking within the project vicinity and trail network.
6	12		Section 3.4.1 Acknowledges the 1,400 daily pedestrian and bicycle trips at AMC are expected to increase between 40% and 1500%, or between 2,000 pedestrians and 22,400 pedestrians using AMC on a daily basis. The proposed plan does not accommodate the growth this projected growth.

7	15		Clarify why vehicle trip generation rates are expected to be 0 during the weekday AM peak hour factoring ANC operations and staff entering the proposed site.
8	15		It is unclear from the Study how the AMC will be modified or signalized to prevent NB through and left turn movements from occurring from Washington Blvd.
9	22		Why do the MOEs for Washington Blvd at study intersection #2 improve under no-build (future baseline) conditions?
10	22		The MOE for Washington Blvd at study intersection #2 in the future build condition are significantly worse in the AM peak period between the Future Baseline to the Future Build Scenario. The queuing spills back across the bridge towards the Pentagon north parking access. This project should propose mitigations for the exacerbated issues at the merge. Conversely, please explain how the results show that Washington Blvd MOE improve with the build condition over the future baseline condition in the PM peak period? The diverted volumes are low and should not result in such a drastic improvement to the delay and queuing.
11	22-23		The queuing from Study intersections #1a and #1b appear to influence each other in the future build scenario for the AMC approaches. Please confirm through simulation that the results accurately capture queuing from both stop bars.
12	26		The HCM explicitly considers the width of sidewalks and trails, usually through the concept of effective width, when determining pedestrian and bicycle LOS yet this was not taken into consideration as part of this study.
13	26-27		The additional information on Pedestrian LOS and available median square footage is noted, and a similar level of analysis is needed for the square footage of adjacent sidewalks/trails on both ends of each crossing so that the waiting space for pedestrians is scaled appropriately. The study should reference applicable design guidance (such as the Shared Use Path Level of Service guidance in the AASHTO Guide for the Development of Bicycle Facilities) to determine the appropriate width of the adjacent sidewalks to accommodate both 1) projected crossing volumes per signal cycle waiting to cross and 2) projected volumes of 2-way pedestrian and bicycle traffic. If additional waiting space at the crosswalk approaches is not provided,

			pedestrians waiting to cross will block the 2-way movement along adjacent sidewalks/multi-use trails, including connections to Arlington Memorial Bridge and the Mount Vernon Trail. The study notes the already high existing volumes of pedestrians and bicyclists, with increases of 40-1,500% projected.
14	28		Proposed pedestrian detour should also include bicyclists riding to/from the 110 Trail
15	28		The proposed 6' sidewalk detour needs to be widened to accommodate 2-way pedestrian and bicycle traffic. As noted throughout the document there is a high mixing of these two modes along adjacent trails and sidewalks, and the detour needs to be sufficiently wide for 2-way moving bike and ped traffic to safely navigate the detour (10' minimum clear width).
16	28		Revise all pedestrian signage to indicate both pedestrians and bicyclists.
17	31		Again, Bicycle, Scooter, Capital bikeshare parking/stations should be planned for and included in this section
18	31		MVT Trail through users should be separated from people visiting the Arch.
19	31		Given anticipated levels of attendees visiting the AMC and one-hour turnover of visitors as illustrated in the Study, the proposed curbside loading/unloading of passengers appears insufficient for TNC vehicles, tour buses, delivery vehicles, and personal vehicles. Demonstrate how adequate space will be provided for peak visitation periods at the AMC.
20		M04-M06	Show Mount Vernon Trail Connections where they exist
21		P01,P03	Recommend a sidewalk, at least, around the southern portion of the circle to separate trail users from people wishing to visit the Arch. Current MVT trail widths are not wide enough to accommodate projected pedestrian and bicyclist volume. The increase in volume would create additional conflicts and degrade the LOS of the trail. AASHTO Guide for the Development of Bicycle Facilities 6.4.3. Recommended Sared Use Path Widths
22		P03	The eliminated movement from Washington Blvd through the circle should be reinforced with some channelizing devices, such as bollards or flexposts to keep drivers from attempting the maneuver.
23		N06	Detour must be provided for the closure of the Mount Vernon Trail. If possible leave the southern Crosswalk open during this phase and direct users around the circle to Mem. Bridge

24	General		A detailed safety analysis of existing and future safety conditions is not provided. This is critical given the different modes currently interacting and expected to interact in the future. No safety analysis of weaves and merges. No analysis showing how crash hotspots would be addressed identified in the Memorial Circle Safety Improvements Environmental Assessment dated November 2018.
25	General		The report indicates that there are major operational issues to the south of the site where the GW Parkway and Washington Blvd merge. The report notes that the delays and queuing at the weave essentially meter traffic into the study area. There are no planned improvements or mitigations to this condition despite the increase in pedestrian and vehicular volumes. This project needs to mitigate the impacts at the critical weaving section through improvements to either the roadway geometry or operations.
26	General		The Build year of 2031 is utilized as the future condition, but there is no planning year analysis that reflects regional background growth or planned COG model changes to land use and transportation infrastructure. Typically, for modifications to interchanges such as those this project is proposing, we would utilize a planning horizon at least 20 years into the future.
27	General		There are no provisions to provide improvements to the sections of memorial drive between the project area and the metro access. Since the metro station is likely the point of access for a large number of visitors, there should be attention and mitigation of conflicts along the pedestrian paths from the metro station to the planned monument.
28	General		Passive Pedestrian detection will be result in higher pedestrian delay at the signalized locations due to the conflux of shared use paths and likelihood that bicycles will be utilizing the crossings. For example, detection of approaching bicycles prior to waiting in the landing area will be difficult. It is likely that the pedestrian activations will occur every cycle during the peak periods so the simulation tools used should reflect this accurately.
29	General		Where conditions are oversaturated or there are major multimodal operational impacts, VISSIM should be utilized to simulate the interactions between the modes as well as sections of the weave areas where queuing is impacting operations. Synchro/SimTraffic is not a good tool to show conflicts between pedestrians and yielding vehicles. The permitted conflicts between pedestrians

			and yielding vehicles might not be accurately shown with this tool. Synchro should not be used to model weaving condition, hence results further upstream might not be accurately depicted.
30	General		There is a substantial amount of bicycle traffic that travels around the existing circle to access the regional trail network (including the Mount Vernon Trail and Washington Boulevard Trail) and Washington DC. The study provides detail on Pedestrian LOS but does not provide a similar metric that accounts for the high volumes of existing and projected bicycle activity, and the high level of mixing of pedestrian and bicycle traffic that occurs throughout the study area. Consider safe and direct bicycle movements in the alignments and design of the sidewalks, crossings, and construction detours in the project area, such as sufficiently wide sidewalks, curb ramps, and crosswalks to accommodate high-volume two-way mixed pedestrian and bicycle traffic, as well as desire lines for bicyclists particularly between the MVT, ANC, Washington Blvd Trail, and Memorial Bridge.
31	General		Given anticipated volumes of vehicles, pedestrians, and bicyclists during the peak hour, demonstrate how signalized crossing movements will be enforced.

Wednesday, October 28, 2026

Dan Nabors, P.E.
Director, Division of Transportation
Arlington County Department of Environmental Services
2100 Clarendon Boulevard, Suite 900
Arlington, VA 22201

RE: National Park Service (NPS) Responses to Arlington County Division of Transportation (DOT) Comments dated October 22, 2026, on the Transportation Access, Safety, and Operations Analysis for Triumphal Arch at Arlington Memorial Circle

Dear Dan Nabors:

Thank you for your agency's thoughtful review and associated comments on the Transportation Access, Safety, and Operations Analysis. Please see responses to the provided comments below. The National Park Service (NPS) appreciates your input and remains committed to continued coordination throughout the project on potential impacts within your agency's jurisdiction.

Comment #1 | Page/Sheet: 1

- **Comment:** "The report should include pedestrian, bicycle and micromobility circulation improvements around the Circle. The existing network around the circle is an importation bicycle/micromobility connection from the MVT to Washington D.C. Arlington National Cemetery, Rosslyn and Points South."
- **Response:** The proposed improvements include enhancements to pedestrian, bicycle, and micromobility circulation around the Circle through realigned and widened pathways consistent with the surrounding network, as well as new traffic signals to provide safer crossing opportunities. The needs of pedestrians, cyclists, and micromobility users will continue to inform the design as it progresses.

Comment #2 | Page/Sheet: 1

- **Comment:** "Bicycle counts should be included in the report early with the pedestrian counts."
- **Response:** Bicycle volumes were captured during data collection but were reported in combination with pedestrian volumes for the purpose of the warrant analysis.

Comment #3 | Page/Sheet: 12

- **Comment:** "Report indicates an increase in pedestrian and bicycle arrivals to ANC and future memorial site from 1400 per day, existing, up to 22,400 per day, future. Bicycle, Scooter, and Capital Bikeshare parking/docking stations should be provided to accommodate the projected increase in visitors by bicycle, scooter and shared micromobility. Bicycle/Scooter/Bikeshare stations provided with the ANC Entry Area Corridor Project would be insufficient. Providing designated parking spaces around Metro Rail will ensure that more people are able to arrive by other modes than automobile. Providing designated bicycle and micromobility parking spaces will encourage people to park outside of the memorial space and prevent clutter/unwanted parking under the Arch."

- **Response:** Opportunities to incorporate bicycle and scooter parking and shared micromobility docking stations will be evaluated in later phases as the design progresses. These facilities are anticipated to be located outside of the central circle, while maintaining convenient connections to the surrounding pedestrian and bicycle network, to encourage parking and docking outside of the site's perimeter.

Comment #4 | Page/Sheet: 12

- **Comment:** "No mention of improvements to existing trails such as widening to accommodate existing and projected increases to walking and biking within the Study."
- **Response:** Walkways within the site boundaries will be widened to provide continuity with the surrounding multiuse trail network. Proposed widths and transitions will account for the constrained pathway connections along Arlington Memorial Bridge and Memorial Avenue Bridge, where limited opportunities for widening could create pinch points in the network. The nearby portion of the Mount Vernon Trail is also being widened through a separate Mount Vernon Trail – North project.

Comment #5 | Page/Sheet: 12

- **Comment:** "The Study does not provide Bicyclist Level of Service and delay calculations despite the notated projected increases to biking within the project vicinity and trail network."
- **Response:** Projected increases in bicycle activity do not, by themselves, establish the need for separate bicycle level of service and delay calculations. Bicycle volumes were captured during data collection but were reported in combination with pedestrian volumes for the purpose of this phase of the analysis. As the design progresses, we will assess whether additional bicyclist operational analysis is warranted at signalized crossings to inform the design.

Comment #6 | Page/Sheet: 12

- **Comment:** "Section 3.4.1 Acknowledges the 1,400 daily pedestrian and bicycle trips at AMC are expected to increase between 40% and 1500%, or between 2,000 pedestrians and 22,400 pedestrians using AMC on a daily basis. The proposed plan does not accommodate the growth this projected growth."
- **Response:** Section 3.4.1 presents several potential growth scenarios to evaluate operations under a conservative, high-visitation condition. To account for this demand, the signal analysis assumed pedestrian recall during each applicable signal phase, providing pedestrian service every cycle regardless of whether a crossing request was registered. The geometric design also prioritized crossing widths and pedestrian queuing areas to accommodate the anticipated demand.

Comment #7 | Page/Sheet: 15

- **Comment:** "Clarify why vehicle trip generation rates are expected to be 0 during the weekday AM peak hour factoring ANC operations and staff entering the proposed site."
- **Response:** Based on visitation patterns at comparable sites, visitation demand is not expected to meaningfully overlap with the weekday AM peak hour. A small number of additional vehicle trips associated with staff arrivals and other site-related activities may occur during the AM peak hour;

however, the resulting incremental traffic demand is anticipated to have a negligible effect on traffic operations.

Comment #8 | Page/Sheet: 15

- **Comment:** "It is unclear from the Study how the AMC will be modified or signalized to prevent NB through and left turn movements from occurring from Washington Blvd."
- **Response:** Prohibited movements are anticipated to be deterred through vertical channelization integrated with the surrounding landscape design. The design of these elements will be further refined as the design progresses.

Comment #9 | Page/Sheet: 22

- **Comment:** "Why do the MOEs for Washington Blvd at study intersection #2 improve under no-build (future baseline) conditions?"
- **Response:** The improvement in the reported MOEs reflects variability between SimTraffic simulation runs rather than an anticipated improvement in future traffic conditions. The simulation uses random seeds to represent variations in vehicle arrivals and driver behavior, which can produce modest differences in results even under similar operating conditions.

Comment #10 | Page/Sheet: 22

- **Comment:** "The MOE for Washington Blvd at study intersection #2 in the future build condition are significantly worse in the AM peak period between the Future Baseline to the Future Build Scenario. The queuing spills back across the bridge towards the Pentagon north parking access. This project should propose mitigations for the exacerbated issues at the merge. Conversely, please explain how the results show that Washington Blvd MOE improve with the build condition over the future baseline condition in the PM peak period? The diverted volumes are low and should not result in such a drastic improvement to the delay and queuing."
- **Response:** The results shown in the analysis reflected variability among SimTraffic simulation runs. These simulations use random seeds to represent variations in vehicle arrivals and driver behavior, which can produce modest differences in results even under similar operating conditions**.** To reduce the influence of run-to-run variability, five new simulation runs were completed for the AM peak hour, and the resulting MOEs were averaged. The updated results are presented in the attached table and corresponding queue length graphic.

  Relative to the future baseline scenario, the updated results indicate an increase in delay of 18.5 seconds per vehicle, an increase in the 50th-percentile queue length of less than 100 feet, and an increase in the 95th-percentile queue length of approximately 300 feet.

Comment #11 | Page/Sheet: 22–23

- **Comment:** "The queuing from Study intersections #1a and #1b appear to influence each other in the future build scenario for the AMC approaches. Please confirm through simulation that the results accurately capture queuing from both stop bars."

- **Response:** The two signals were modeled as independent operations to estimate queue formation at each location. The queue lengths are measured from each respective stop bar.

Comment #12 | Page/Sheet: 26

- **Comment:** "The HCM explicitly considers the width of sidewalks and trails, usually through the concept of effective width, when determining pedestrian and bicycle LOS yet this was not taken into consideration as part of this study."
- **Response:** Walkways within the site boundaries will be widened to provide continuity with the surrounding multiuse trail network. Proposed widths and transitions will account for the constrained pathway connections along Arlington Memorial Bridge and Memorial Avenue Bridge, where there are limited opportunities for widening. The nearby portion of the Mount Vernon Trail is also being widened through a separate Mount Vernon Trail – North project**.**

Comment #13 | Page/Sheet: 26–27

- **Comment:** "The additional information on Pedestrian LOS and available median square footage is noted, and a similar level of analysis is needed for the square footage of adjacent sidewalks/trails on both ends of each crossing so that the waiting space for pedestrians is scaled appropriately. The study should reference applicable design guidance (such as the Shared Use Path Level of Service guidance in the AASHTO Guide for the Development of Bicycle Facilities) to determine the appropriate width of the adjacent sidewalks to accommodate both 1) projected crossing volumes per signal cycle waiting to cross and 2) projected volumes of 2-way pedestrian and bicycle traffic. If additional waiting space at the crosswalk approaches is not provided, pedestrians waiting to cross will block the 2-way movement along adjacent sidewalks/multi-use trails, including connections to Arlington Memorial Bridge and the Mount Vernon Trail. The study notes the already high existing volumes of pedestrians and bicyclists, with increases of 40-1,500% projected."
- **Response:** The detailed geometry of individual pedestrian waiting areas, crossings, and adjacent infrastructure will be refined during subsequent design phases, accounting for physical constraints that affect the effective width and usable area for non-motorized users to the greatest extent feasible.

Comment #14 | Page/Sheet: 28

- **Comment:** "Proposed pedestrian detour should also include bicyclists riding to/from the 110 Trail."
- **Response:** Please continue to coordinate with the NPS as this connection is developed further to ensure alignment between the two projects.

Comment #15 | Page/Sheet: 28

- **Comment:** "The proposed 6' sidewalk detour needs to be widened to accommodate 2-way pedestrian and bicycle traffic. As noted throughout the document there is a high mixing of these two modes along adjacent trails and sidewalks, and the detour needs to be sufficiently wide for 2-way moving bike and ped traffic to safely navigate the detour (10' minimum clear width)."

- **Response:** Detailed sizing of detour widths will be refined during subsequent design phases. The needs of pedestrians, cyclists, and other micromobility users will continue to inform the detour design as it's further developed.

Comment #16 | Page/Sheet: 28

- **Comment:** "Revise all pedestrian signage to indicate both pedestrians and bicyclists."
- **Response:** Signing and marking plans will be refined as the design develops.

Comment #17 | Page/Sheet: 31

- **Comment:** "Again, Bicycle, Scooter, Capital bikeshare parking/stations should be planned for and included in this section."
- **Response:** Opportunities to incorporate bicycle and scooter parking and shared micromobility docking stations will be evaluated in later phases as the design progresses.

Comment #18 | Page/Sheet: 31

- **Comment:** "MVT Trail through users should be separated from people visiting the Arch."
- **Response:** Pedestrian areas will be refined during subsequent design phases to accommodate anticipated visitor queuing and gathering within existing site constraints while maintaining adequate clear width for through trail traffic.

Comment #19 | Page/Sheet: 31

- **Comment:** "Given anticipated levels of attendees visiting the AMC and one-hour turnover of visitors as illustrated in the Study, the proposed curbside loading/unloading of passengers appears insufficient for TNC vehicles, tour buses, delivery vehicles, and personal vehicles. Demonstrate how adequate space will be provided for peak visitation periods at the AMC."
- **Response:** Different demand scenarios were considered to ensure signal operations were evaluated under a conservative, high-visitation condition. Pick-up and drop-off facilities are not sized to accommodate the maximum theoretical demand, as doing so could require disproportionate curb space and the creation of parking lots for infrequent surges in activity. Instead, curbside activity considers practical operating capacity, with occasional demand surges addressed through operational management.

Comment #20 | Page/Sheet: M04–M06

- **Comment:** "Show Mount Vernon Trail Connections where they exist."
- **Response:** The plans depict the existing connection to the Mount Vernon Trail in the southeastern quadrant of the site.

Comment #21 | Page/Sheet: P01, P03

- **Comment:** "Recommend a sidewalk, at least, around the southern portion of the circle to separate trail users from people wishing to visit the Arch. Current MVT trail widths are not wide enough to accommodate projected pedestrian and bicyclist volume. The increase in volume would create

additional conflicts and degrade the LOS of the trail. AASHTO Guide for the Development of Bicycle Facilities 6.4.3. Recommended Shared Use Path Widths."

- **Response:** Pathways within the site boundaries will be widened with consideration of existing site constraints and connections to the surrounding pedestrian and bicycle network. Dedicated queuing and gathering areas will be provided where visitors are anticipated to linger, separating stationary activity from through movements. Constrained pathway connections along Arlington Memorial Bridge and Memorial Avenue Bridge limit widening opportunities on the east and west sides of the site. The adjacent segment of the Mount Vernon Trail will be widened as part of the separate Mount Vernon Trail – North project.

Comment #22 | Page/Sheet: P03

- **Comment:** "The eliminated movement from Washington Blvd through the circle should be reinforced with some channelizing devices, such as bollards or flexposts to keep drivers from attempting the maneuver."
- **Response:** Prohibited movements are anticipated to be deterred through vertical channelization integrated with the surrounding landscape design. The design of these elements will be further refined as the design progresses.

Comment #23 | Page/Sheet: N06

- **Comment:** "Detour must be provided for the closure of the Mount Vernon Trail. If possible leave the southern Crosswalk open during this phase and direct users around the circle to Mem. Bridge"
- **Response:** NPS will evaluate opportunities to minimize construction impacts on pedestrians and bicyclists to the greatest extent feasible as the design progresses, including maintaining access through the southern crosswalk for the majority of the proposed construction phase and limiting closures to periods when required by construction activities.

Comment #24 | Page/Sheet: General

- **Comment:** "A detailed safety analysis of existing and future safety conditions is not provided. This is critical given the different modes currently interacting and expected to interact in the future. No safety analysis of weaves and merges. No analysis showing how crash hotspots would be addressed identified in the Memorial Circle Safety Improvements Environmental Assessment dated November 2018."
- **Response:** A standalone predictive safety analysis is not necessary at this stage of the design to assess the anticipated safety benefits of the proposed concept relative to existing conditions. Signalization will assign separate phases to conflicting movements, reducing the need for drivers, pedestrians, and bicyclists to identify safe gaps in traffic or rely on other drivers yielding the right-of-way. This separation is intended to reduce conflicts at existing crash hotspots. Together with the proposed lane configurations, signalization is also intended to reduce merging and weaving conflicts and make movements more predictable for all users. These measures provide a technical basis for the anticipated safety benefits within existing site and operational constraints, with targeted safety evaluations to follow as appropriate during later design phases.

Comment #25 | Page/Sheet: General

- **Comment:** "The report indicates that there are major operational issues to the south of the site where the GW Parkway and Washington Blvd merge. The report notes that the delays and queuing at the weave essentially meter traffic into the study area. There are no planned improvements or mitigations to this condition despite the increase in pedestrian and vehicular volumes. This project needs to mitigate the impacts at the critical weaving section through improvements to either the roadway geometry or operations."
- **Response:** The proposed improvements are not anticipated to substantially impact existing conditions at the Washington Boulevard merge south of the area. To better evaluate this and reduce the influence of run-to-run variability, five new simulation runs were completed for the AM peak hour, and the resulting MOEs were averaged. The updated results are presented in the attached table. Relative to the future baseline scenario, the results indicate an increase in delay of 18.5 seconds per vehicle, an increase in the 50th-percentile queue length of less than 100 feet, and an increase in the 95th-percentile queue length of approximately 300 feet. This is also shown in the updated queue length graphic attached.

Comment #26 | Page/Sheet: General

- **Comment:** "The Build year of 2031 is utilized as the future condition, but there is no planning year analysis that reflects regional background growth or planned COG model changes to land use and transportation infrastructure. Typically, for modifications to interchanges such as those this project is proposing, we would utilize a planning horizon at least 20 years into the future."
- **Response**: For the purpose of this analysis, a five-year build-out horizon was selected to evaluate the operational performance of the completed improvements under projected near-term traffic conditions. Longer-term planning horizons may be considered in subsequent analyses as the design progresses.

Comment #27 | Page/Sheet: General

- **Comment:** "There are no provisions to provide improvements to the sections of memorial drive between the project area and the metro access. Since the metro station is likely the point of access for a large number of visitors, there should be attention and mitigation of conflicts along the pedestrian paths from the metro station to the planned monument."
- **Response:** Safe access from nearby Metrorail stations is provided through the broader pedestrian and bicycle network connecting to the site, including the safety and access improvements shown in the plans. Specific access and safety concerns related to Metrorail access will be further evaluated during subsequent design phases as needed.

Comment #28 | Page/Sheet: General

- **Comment:** "Passive Pedestrian detection will be result in higher pedestrian delay at the signalized locations due to the conflux of shared use paths and likelihood that bicycles will be utilizing the crossings. For example, detection of approaching bicycles prior to waiting in the landing area will be difficult. It is likely that the pedestrian activations will occur every cycle during the peak periods so the simulation tools used should reflect this accurately."

- **Response:** The traffic simulation assumed pedestrian calls during every signal cycle, representing a conservative condition in which pedestrian service is provided every cycle. Passive detection is anticipated to be limited to the crossing waiting area to minimize false calls from passing users. Under this configuration, pedestrians and bicyclists would stop within the detection zone to register a crossing request without needing to physically press a pushbutton, then would wait for the applicable crossing indication before proceeding. The passive detection design will be further refined in subsequent design phases.

Comment #29 | Page/Sheet: General

- **Comment:** "Where conditions are oversaturated or there are major multimodal operational impacts, VISSIM should be utilized to simulate the interactions between the modes as well as sections of the weave areas where queuing is impacting operations. Synchro/SimTraffic is not a good tool to show conflicts between pedestrians and yielding vehicles. The permitted conflicts between pedestrians and yielding vehicles might not be accurately shown with this tool. Synchro should not be used to model weaving condition, hence results further upstream might not be accurately depicted."
- **Response:** Synchro/SimTraffic was selected as an appropriate tool for evaluating the proposed lane configurations, signal operations, delay, and queuing, particularly due to the interactions between closely spaced intersections. The proposed design does not introduce yield-controlled interactions, new weaving conditions, or substantial changes to existing weaving operations. Although the analysis did not identify substantial operational impacts at existing merge locations, NPS recognizes that VISSIM could provide additional insight into merging and weaving operations south of the site, including interactions between the GWMP and Richmond Highway ramps approaching Memorial Avenue and along Washington Boulevard. NPS will consider its use in subsequent analyses as design development progresses.

Comment #30 | Page/Sheet: General

- **Comment:** "There is a substantial amount of bicycle traffic that travels around the existing circle to access the regional trail network (including the Mount Vernon Trail and Washington Boulevard Trail) and Washington DC. The study provides detail on Pedestrian LOS but does not provide a similar metric that accounts for the high volumes of existing and projected bicycle activity, and the high level of mixing of pedestrian and bicycle traffic that occurs throughout the study area. Consider safe and direct bicycle movements in the alignments and design of the sidewalks, crossings, and construction detours in the project area, such as sufficiently wide sidewalks, curb ramps, and crosswalks to accommodate high-volume two-way mixed pedestrian and bicycle traffic, as well as desire lines for bicyclists particularly between the MVT, ANC, Washington Blvd Trail, and Memorial Bridge."
- **Response:** Safe and direct bicycle movements were considered in developing the proposed design and will continue informing later design phases. Bicycle activity alone does not establish the need for separate bicycle LOS and delay calculations, and at this stage, those measures are not necessary to assess the anticipated safety and access benefits relative to existing conditions. These benefits include new north–south access on the west side of Arlington Memorial Bridge and signalized crossings that reduce bicyclists' reliance on finding safe gaps in traffic or drivers yielding the right-of-way. Bicyclist movements, including desire lines and the capacity of shared-use facilities, will continue to inform pathway and crossing geometries as the design is further refined.

Comment #31 | Page/Sheet: General

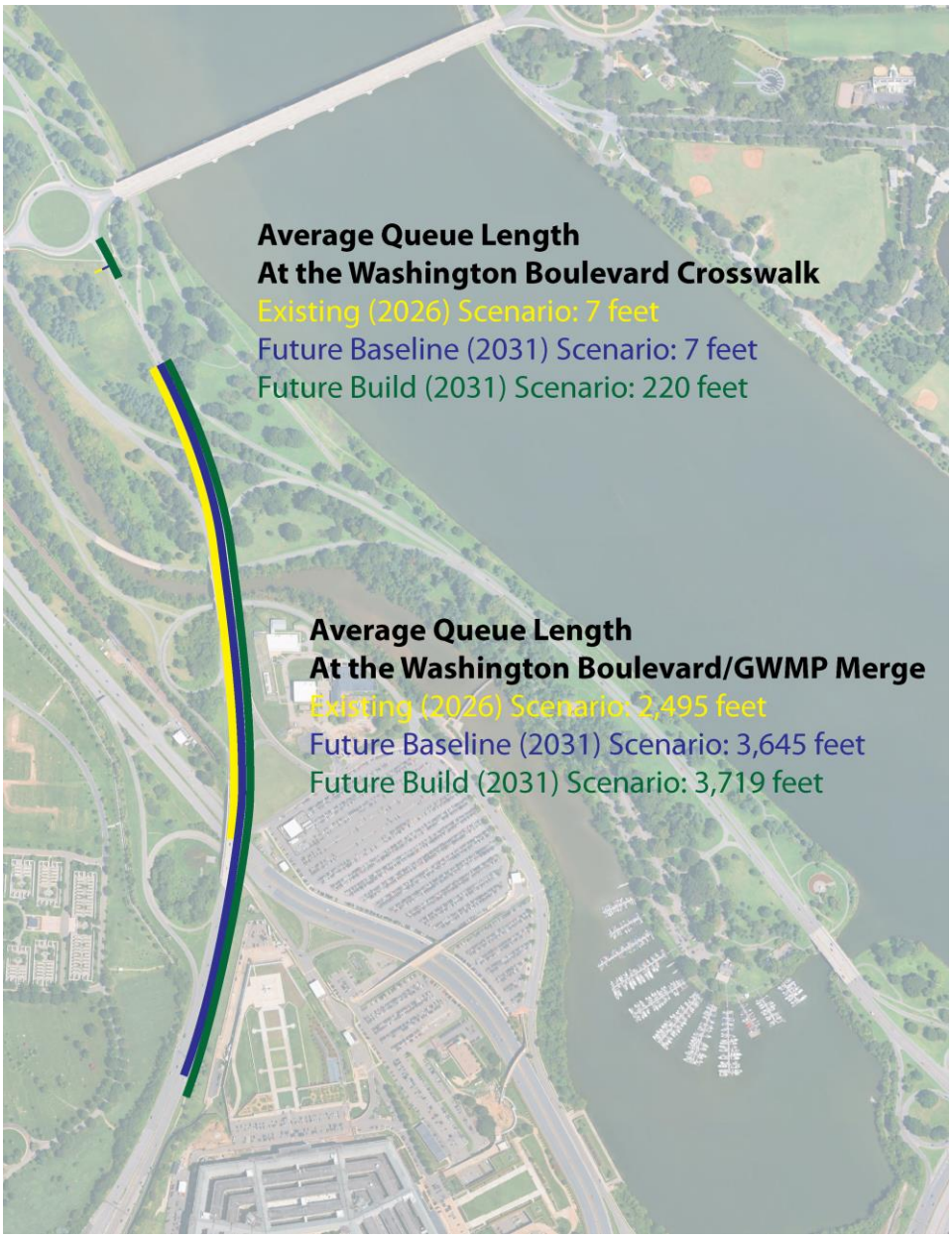
- **Comment:** "Given anticipated volumes of vehicles, pedestrians, and bicyclists during the peak hour, demonstrate how signalized crossing movements will be enforced."
- **Response:** Pedestrian compliance will be encouraged through clearly visible and accessible pedestrian signals, convenient crossing alignments, and signal operations that minimize unnecessary waiting while providing adequate crossing and clearance intervals. These elements will be further refined during future design iterations to ensure that the designated crossings are convenient to use and that the signal indications are clear and predictable, helping increase compliance and reduce the need for enforcement.

October 2026 Update – Average of 5 Simulation Runs

Traffic Operations Analysis Summary, Weekday a.m. Peak Hour

Scenario	Existing	Existing	Existing	Existing	Future Baseline	Future Baseline	Future Baseline	Future Baseline	Future Build	Future Build	Future Build	Future Build
Intersection/Approach	LOS	Delay (s)	Average Queue Length (ft)	95th %ile Queue Length (ft)	LOS	Delay (s)	Average Queue Length (ft)	95th %ile Queue Length (ft)	LOS	Delay (s)	Average Queue Length (ft)	95th %ile Queue Length (ft)
#1a: Washington Blvd at AMC/AMB	A	2.6	-	-	A	2.7	-	-	A	8.2	-	-
AMC EB L/T	A	3.4	6	28	A	3.4	4	23	B	12.7	300	534
Washington Blvd NB T	E	46.0	33	68	E	46.3	36	73				
Washington Blvd NB R	A	1.4	7	61	A	1.4	7	59	A	5.7	200	340
Washington Blvd NB R	A	1.4	2	29	A	1.4	4	41	A	6.2	220	361
#1b: Arlington Blvd at AMC/AMB	A	1.5	-	-	A	1.5	-	-	B	11.9	-	-
AMB WB T	A	4.7	50	73	A	4.7	52	77	A	8.8	81	163
AMB WB R	A	0.5	9	36	A	0.5	10	39	A	9.0	118	193
AMB WB R	A	0.3	2	19	A	0.3	1	11	B	10.8	129	205
AMC NB L/T	A	1.7	3	20	A	1.7	3	17	D	41.0	66	121
#1c: Washington Blvd Crosswalk	A	8.1	-	-	A	8.6	-	-			-	-
Washington Blvd NB T	A	8.0	212	376	A	8.7	211	384				
Washington Blvd NB T	A	8.1	212	374	A	8.6	218	389				
#1d: Arlington Blvd Crosswalk	A	1.9	-	-	A	1.8	-	-	A	0.4	-	-
Arlington Blvd NB T	A	1.9	41	96	A	1.8	38	89	A	0.4	1	8
Arlington Blvd NB T	A	1.9	50	110	A	1.9	52	111	A	0.3	0	4
#1e: Memorial Ave at AMC	A	8.0	-	-	A	8.5	-	-	C	23.7	-	-
Memorial Ave EB R	A	9.9	4	83	B	10.5	0	0	C	28.6	183	694
AMC SB T	D	27.4	0	0	D	27.9	0	0	B	17.1	36	97
AMC SB R	A	0.2	0	0	A	0.2	0	0	A	0.1	30	62
#2: Washington Blvd at GWMP Ramp Merge	F	138.0	-	-	F	194.8	-	-	F	213.3	-	-
Washington Blvd NB T	F	166.8	2,489	4,881	F	236.0	3,627	7,046	F	299.1	3,714	7,344
Washington Blvd NB T	F	211.8	2,495	4,872	F	300.5	3,645	7,013	F	282.1	3,719	7,330
GWMP Ramp NWB R	A	5.5	29	125	A	6.1	40	175	A	7.2	68	196
GWMP Ramp NWB R	A	1.1	13	87	A	1.4	14	84	A	1.1	22	114
#3: Memorial Ave at Richmond Hwy Off-Ramp	A	3.4	-	-	A	3.5	-	-	A	6.1	-	-
Memorial Ave EB T	A	0.0	0	0	A	0.0	0	0	A	0.0	0	0
Memorial Ave WB T	A	2.0	0	0	A	1.9	0	0	A	6.0	0	0
Ramp NB L	C	15.5	55	231	B	14.4	55	206	C	17.1	75	274
Ramp NB R	A	3.0	58	283	A	3.3	61	291	A	5.1	90	368
#4: Memorial Ave at Richmond Hwy On-Ramp	A	0.7	-	-	A	0.7	-	-	A	1.2	-	-
Memorial Ave EB T	A	0.0	0	0	A	0.0	0	0	A	0.0	0	0
Memorial Ave WB T	A	1.9	0	0	A	1.8	0	0	A	3.0	0	0
Memorial Ave WB R	A	0.1	0	6	A	0.1	1	7	A	0.1	0	0
#5: Richmond Hwy Ramp at GWMP Ramp	A	4.4	-	-	A	4.3	-	-	A	4.1	-	-
Richmond Hwy NB T	A	5.4	2	25	A	5.3	0	0	A	5.7	3	42
GWMP Ramp NWB R	A	2.8	0	5	A	2.9	1	10	A	1.5	1	16

October 2026 Update – Average of 5 Simulation Runs
Average Queue Length Diagram



U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

23 April 2026

Dear Secretary Burgum:

In its meeting of 16 April, the Commission of Fine Arts reviewed a concept design submission for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission expressed appreciation for your comments in introducing the proposal at the meeting and approved the submission with the following comments.

The Commission members commented that a proposed monumental arch—a feature characteristic of many national capital cities—would contribute positively to the honorific landscape of Washington, D.C., for many generations. Citing the history of monumental planning for the city to include a large marker in Memorial Circle, they expressed support for the location on this important axis between the Lincoln Memorial and Arlington National Cemetery, and they endorsed the 166-foot height of the arch itself as appropriate for this setting. However, they noted that the great scale and solidity of the proposed structure, while framing axial views between the memorials, may block oblique views within this monumental setting. They therefore recommended creating secondary open archways within the legs of the central arch in order to make it more open; they also suggested creating a more appropriately grand entry sequence into the interior public spaces of the arch.

For the 84-foot-high monumental grouping of a gilded, winged allegorical figure and flanking eagles on a stepped base proposed for the top of the arch, the Commission members suggested removing these from the design, observing that the project would appear more compatible with Washington's monumental context without these elements. Regarding the proposed program of sculpture generally, the Commission members requested more information on the various artworks intended for the project, including those for the arched niches, panels, friezes, keystones, and other areas of the arch. They discouraged the inclusion of lions at the base of the arch, which they noted are not native to the United States, but they encouraged substituting native North American examples of heroic, mighty creatures such animals as bison, horses, or grizzly bears. They also suggested removing the wingless bust of an eagle at the keystone of the central arch.

Regarding the treatment of the site, the Commission members acknowledged the difficulty of providing pedestrian access to the arch, which is proposed to be located within a traffic circle. Rather than constructing a tunnel hundreds of feet long to provide this pedestrian access, they recommended adding a surface crosswalk on the western side of the traffic circle, which would allow a symmetrical composition for the ramps that lead from the street level to the elevated plinth at the base of the arch. They also recommended refining the relationship of the site to the traffic circle itself,

extending the landscape design outward to the greatest extent possible, as well as limiting the use of asphalt pavement to the minimum required for traffic and using a different material, such as stone cobbles, for the restricted areas of the circle instead of applied graphic striping as presented.

In its action of concept approval, the Commission requested that the project be reviewed next as a revised concept submission that responds to these comments. The submission should include: more detailed information should be provided about the intended program of sculptures; an extension of the site model to illustrate the axis of the National Mall eastward from the Lincoln Memorial; the illustration of views to the arch from Arlington House, the Hemicycle, and the Lincoln Memorial; and documentation of the absolute heights of the major monuments within this symbolic landscape as measured from sea level.

The Commission of Fine Arts looks forward to the continued review of this substantial addition to the monumental composition of the national capital. Please coordinate the next submission with the staff which, as always, is available to assist you.

Sincerely,

Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Robin Rode, Les Métalliers Champenois
Josh Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

28 May 2026

Dear Secretary Burgum:

In its meeting of 21 May, the Commission of Fine Arts reviewed a revised concept design proposal for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission approved the submission as a final proposal for the architectural design with the following comments, requesting further information about the arch's program of sculpture.

The Commission members expressed appreciation for the presentation, which included additional information about the structure's interior, a more extensive site model, rendered views of the proposed arch within the larger monumental context, and the simplification of various decorative features. They cited the history of heroic architecture proposed for this site in the late nineteenth and early twentieth centuries, including several arches and a pair of 166-foot-tall columns; they commented that this proposal builds on the legacy of the McMillan Plan for Washington, D.C., and would extend the symbolic landscape beyond the National Mall. They noted that the city and its narrative of monuments is not static, and this project provides an opportunity for new national stories. In their discussion, the Commission members noted the numerous objections to the project and advised that many of these issues are not part of the Commission's purview. Instead, they characterized the project as beautiful, and they found that the presentation shows the arch would be visually open and would not block views toward the significant landmarks in this context. They concluded that the arch is appropriately scaled to frame and enhance Arlington House as the landmark that terminates the long ceremonial axis from the Lincoln Memorial, and that it would give the historic home of General Robert E. Lee the visual prominence it deserves as the endpoint of the monumental McMillan Plan sequence extending from the Capitol to Arlington National Cemetery.

In their support for the architectural design of the arch as presented, the Commission members resolved to approve this revised concept submission as a final design, with the exception of the sculpture, bas-relief panels, and statuary in the arched niches, which should be submitted when these elements have been designed. Noting the spare character of arch's inner surfaces, they also suggested adding articulation, such as panels, surface relief, or inscriptions to complete the development of the design.

With this action of final approval, the Commission has concluded its review of the architectural components of this project and looks forward to the review of the comprehensive sculptural program.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Joshua Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

APPENDIX I

FEDERAL AVIATION ADMINISTRATION REPORTS

Federal Aviation Administration
Report of Internal Review
ASN: 2026-AEA-5959-OE
Generated by Kelly R Nelson on 2026-06-01

The Obstruction Evaluation Group, AJV-15, has conducted a limited aeronautical review under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Building Monumental Arch
County, State: District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	AGL	AMSL
pt-1	38-53-08.01N	77-3-34.80W	29 Ft	190 Ft	219 Ft
pt-2	38-53-09.08N	77-3-37.04W	29 Ft	190 Ft	219 Ft
pt-3	38-53-07.54N	77-3-36.03W	29 Ft	190 Ft	219 Ft
pt-4	38-53-09.54N	77-3-35.84W	29 Ft	190 Ft	219 Ft
pt-5	38-53-08.56N	77-3-35.88W	29 Ft	250 Ft	279 Ft

This review was initiated as a result of:

A request for aeronautical review from another FAA component, another agency, or a person with a valid interest in the matter.

The results of this review can be found on the attached page(s).

NOTE: THE RESULTS OF THIS LIMITED FAA REVIEW IS NOT AN OFFICIAL DETERMINATION OF FINDINGS BUT ONLY A REPORT BASED ON THE GENERAL OR ESTIMATED INFORMATION SUPPLIED FOR THE STRUCTURE. ANY FUTURE, OFFICIAL AERONAUTICAL STUDY MAY REVEAL DIFFERENT RESULTS.

Additional Information for ASN 2026-AEA-5959-OE

Proposal: To review a(n) Building at a height of 250 feet above ground level, 279 feet above mean sea level.

Location: The structure is located 2.29 nautical miles northwest of DCA Airport reference point.

Part 77 Obstruction Standard(s) Exceeded:
Section 77.17 (a) (2) by 50 feet - a height that exceeds 229 feet above mean sea level within 1.65 nautical miles of DCA.

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:
Section 77.19 (a) Horizontal Surface by 115 feet as applied to DCA .
Section 77.19 (b) Conical Surface by 55 feet as applied to DCA .

In order to complete this limited aeronautical review, the Obstruction Evaluation Group requested and received input from:

Other
ASN: 2026-AEA-5959-OE

This Feasibility Study, otherwise known as a limited aeronautical review, was conducted by the Federal Aviation Administration (FAA) for the National Park Service's proposed Building. Architectural drawings, surveys, coordinates, and overall height are still not fully available at this time.

1. LOCATION OF PROPOSED CONSTRUCTION
The proposed building submitted for review, 250 feet (ft.) above ground level (AGL), 279 ft. above mean sea level (AMSL), would be located approximately 1.65 nautical miles (NM) northwest of the approach end Runway (RWY) 15 at Ronald Reagan Washington National Airport (DCA) in Arlington, VA. To date, the FAA has only received a proposal with estimated coordinates for review. Therefore, the limited review noted below was completed in the form of a Feasibility Report as stated in paragraph 1.

Each of the five structure points have been studied separately under the following aeronautical study numbers:

PT1: 38-53-08.01N / 77-03-34.80W / 190 ft. above ground level (AGL) / 219 ft. above mean sea level (AMSL)
PT2: 38-53-09.08N / 77-03-37.04W / 190 ft. AGL / 219 ft. AMSL
PT3: 38-53-07.54N / 77-03-36.03W / 190 ft. AGL / 219 ft. AMSL
PT4: 38-53-09.54N / 77-03-35.84W / 190 ft. AGL / 219 ft. AMSL
PT5: 38-53-08.56N / 77-03-35.88W / 250 ft. AGL / 279 ft. AMSL

2. OBSTRUCTION STANDARDS EXCEEDED
The proposal has been identified as an obstruction under the standards of Title 14, Code of Federal Regulations (CFR), Part 77, as applied to DCA:

a. Section 77.17 (a)(2): A height that is 200 feet AGL, or above the established airport elevation, whichever is higher, within 3 nautical miles of the established reference point of an airport, excluding heliports, with its longest runway more than 3,200 feet in actual length, and that height increases in the proportion of 100 feet for each additional nautical mile from the airport up to a maximum of 499 feet. The proposal would exceed by the following:

PT5: 50 feet (ft.)

b. Section 77.19 (a): Horizontal Surface. A horizontal plane 150 feet above the established airport elevation, the perimeter of which is constructed by swinging arcs of a specified radii from the center of each end of the primary surface of each runway of each airport and connecting the adjacent arcs by lines tangent to those arcs. The proposal would exceed the horizontal surface by the following:

PT1: 55 ft.
PT3: 55 ft.
PT5: 115 ft.

c. Section 77.19 (b): Conical surface. A surface extending outward and upward from the periphery of the horizontal surface at a slope of 20 to 1 for a horizontal distance of 4,000 feet. The proposal would exceed the conical surface by the following:

PT2: 55 ft.
PT4: 55 ft.

3. EFFECT ON AERONAUTICAL OPERATIONS
a. The impact on arrival, departure, and en route procedures for aircraft operating under VFR:

1) The hypothetical building would exceed the DCA Part 77.17(a)(2) surface by 50 feet, the DCA Part 77 horizontal surface by up to 115 feet, and the DCA conical surface by 55 ft.

2) The hypothetical building would not penetrate the DCA Visual Flight Rules (VFR) traffic pattern airspace (TPA).

b. The impact on arrival, departure, and en route procedures for aircraft operating under IFR: The hypothetical building would not affect any identified instrument flight procedures into DCA.

c. The impact on all existing and planned public-use airports and aeronautical facilities: None.

d. The cumulative impact resulting from the proposed construction or alteration of a structure when combined with the impact of other existing or proposed structures: None.

4. CONCLUSIONS
The feasibility study revealed that the hypothetical building, at the filed heights listed above, would have no significant adverse effect on airspace and visual/instrument procedures at Ronald Reagan Washington International Airport. The buildings penetration of the Part 77.17(a)(2) surface, horizontal surface, and the conical surface would require it to be lit with red obstruction lights. It would not penetrate the visual traffic pattern protected airspace at Ronald Reagan Washington National Airport, nor would it have any effect on airport facilities or radio/visual navigational and landing aids.

This feasibility study does not constitute a determination of no hazard to air navigation from the FAA. Its purpose is to give the proponent information on effects the proposed structure would have on airspace and aeronautical procedures, and prescribe ways to eliminate or mitigate those effects, in order to allow the proponent to plan for and design the actual structure that will be built on the site. A full aeronautical study will be required for the actual design of the building prior to its construction.

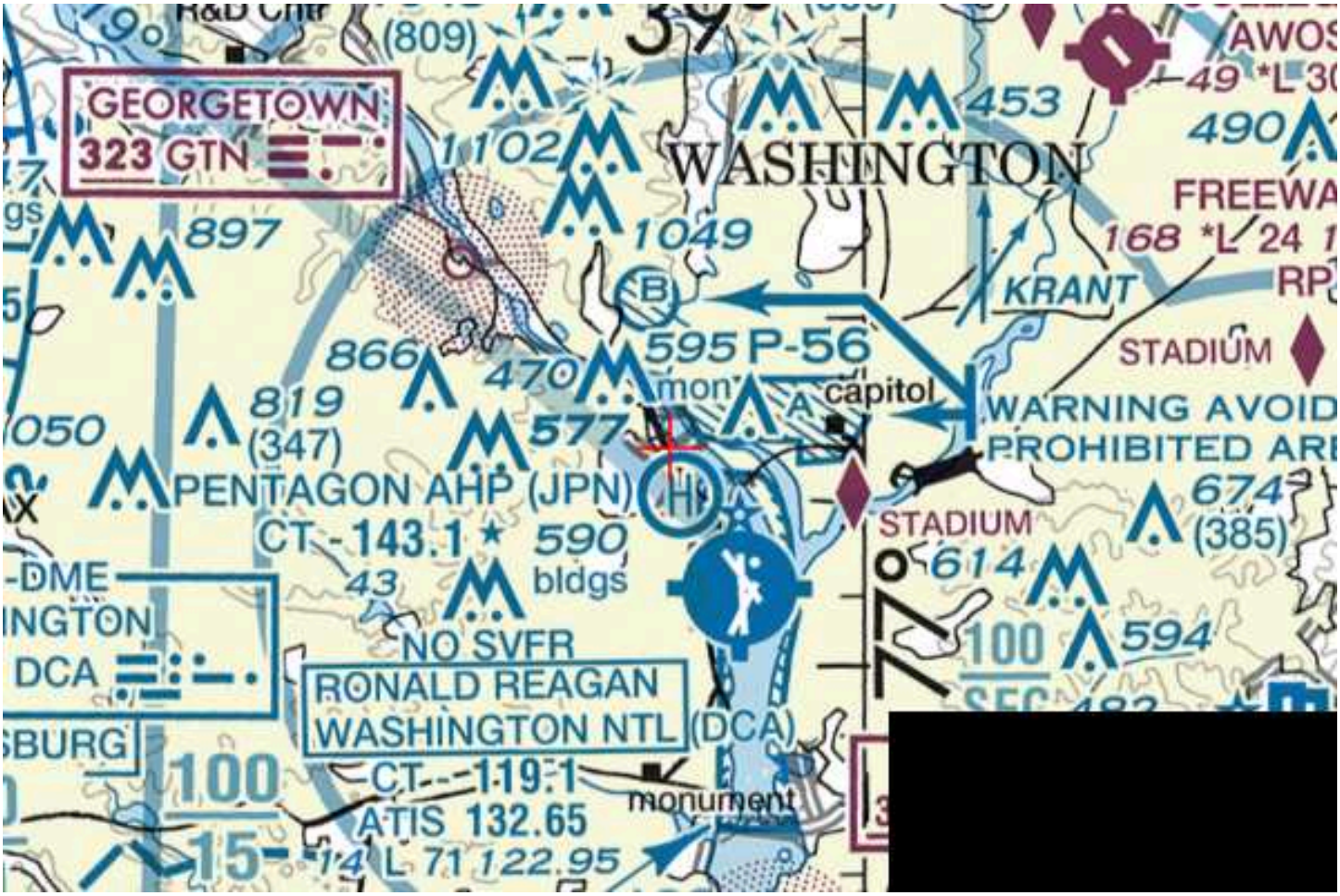
Additional Comments:
1. The future e-filing of the proposal will require e-filing all four corners and the high point of the proposal when specific data becomes available.

2. The sponsor should submit the proposal using the site elevation/finished floor elevation (FFE). Please review requirements for both site elevation and above ground level elevation rounding as noted on FAA Form 7460-1, Notice of Proposed Construction or Alteration.

Based on this review, the structure should be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M Change 1 , Obstruction Marking and Lighting, red lights-Chapters 4,5(Red),&15 .

The owner of the structure must be advised to report any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

Sectional Map for ASN 2026-AEA-5959-OE



****REPORT OF INTERNAL REVIEW****

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-AEA-8684-OE

Issued Date: 07/28/2026

NATIONAL PARK SERVICE
NATIONAL PARK SERVICE
1849 C Street
Washington, DC 20240

****DETERMINATION OF NO HAZARD TO AIR NAVIGATION FOR TEMPORARY STRUCTURE****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Mobile Crane Monumental Arch
County, State: District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	38-53-09.00N	77-3-37.80W	29 Ft	130 Ft	159 Ft
pt-2	38-53-10.00N	77-3-35.40W	28 Ft	130 Ft	158 Ft
pt-3	38-53-07.30N	77-3-36.90W	29 Ft	130 Ft	159 Ft
pt-4	38-53-08.00N	77-3-34.10W	27 Ft	130 Ft	157 Ft

This aeronautical study revealed that the temporary structure does not exceed obstruction standards and would not be a hazard to air navigation provided the condition(s), if any, in this letter is (are) met:

SEE ATTACHMENT FOR ADDITIONAL CONDITION(S) OR INFORMATION

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of a structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination did not include an evaluation of the permanent structure associated with the use of this temporary structure. If the permanent structure will exceed Title 14 of the Code of Federal Regulations, part 77.9, a separate aeronautical study and FAA determination is required.

This determination concerns the effect of this temporary structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Aviation Administration Flight Procedures Office if the structure is subject to the issuance of a Notice to Airmen (NOTAM).

If you have any questions, please contact our office at 1-404-305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-AEA-8684-OE

Signature Control No: 715494975-716405125 (TMP)
Kelly Nelson
Specialist

Additional Condition(s) or Information for ASN 2026-AEA-8684-OE

Proposal: To construct and/or operate a(n) Mobile Crane to a height of 130 feet above ground level, 159 feet above mean sea level.

Location: The structure will be located 2.28 nautical miles northwest of DCA Airport reference point.

Part 77 Obstruction Standard(s) Exceeded and Aeronautical Impacts, if any:

Aeronautical study revealed that the temporary structure will not exceed any Part 77 obstruction standard. Aeronautical study confirmed that the temporary structure will have no effect on any existing or proposed arrival, departure or en route instrument/visual flight rules (IFR/VFR) operations or procedures. Additionally, aeronautical study confirmed that the temporary structure will have no physical or electromagnetic effect on the operation of air navigation and communications facilities and will not impact any airspace and routes used by the military. Based on this aeronautical study, the FAA finds that the temporary structure will have no adverse effect on air navigation and will not impact any aeronautical operations or procedures.

Based on this aeronautical study, the structure would not constitute a substantial adverse effect on aeronautical operations or procedures because it will be temporary. The temporary structure would not be considered a hazard to air navigation provided all of the conditions specified in this determination are strictly met.

As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M Change 1, Obstruction Marking and Lighting, flags/red lights-Chapters 3(Marked),4,5(Red),14(Temporary),&15.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that the manager of RONALD REAGAN WASHINGTON NTL, (703) 417-8050 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site.

It is required that the manager of RONALD REAGAN WASHINGTON NTL ATCT, 703-413-0335 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site. Additionally, please provide contact information for the onsite operator in the event that Air Traffic Control requires the temporary structure to be lowered immediately.

This determination expires on 01/28/2028 unless extended, revised, or terminated by the issuing office.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed within 5 days after the temporary structure is dismantled.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.


WASHINGTON
GEORGETO
323 GTN
897
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KRANT
595 P-56
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capitol
STADIUM
WARNING AVOID
PROHIBITED ARE
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(385)
PENTAGON AHP (JPN)
CT 143.1 ★ 590
43
bldgs
614
100
594
SFC 482
NO SVFR
RONALD REAGAN
WASHINGTON NTL (DCA)
CT 119.1
ATIS 132.65
L 71 122.95
monument
OXONN
332 VQK
DCA
100
15
77°

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-AEA-8685-OE

Issued Date: 07/28/2026

NATIONAL PARK SERVICE
NATIONAL PARK SERVICE
1849 C Street
Washington, DC 20240

****DETERMINATION OF NO HAZARD TO AIR NAVIGATION FOR TEMPORARY STRUCTURE****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Mobile Crane Monumental Arch
County, State: District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	38-53-09.00N	77-3-37.80W	29 Ft	260 Ft	289 Ft
pt-2	38-53-10.00N	77-3-35.40W	28 Ft	260 Ft	288 Ft
pt-3	38-53-07.30N	77-3-36.90W	29 Ft	260 Ft	289 Ft
pt-4	38-53-08.00N	77-3-34.10W	27 Ft	260 Ft	287 Ft

This aeronautical study revealed that the temporary structure does exceed obstruction standards but would not be a hazard to air navigation provided the condition(s), if any, in this letter is (are) met:

SEE ATTACHMENT FOR ADDITIONAL CONDITION(S) OR INFORMATION

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of a structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination did not include an evaluation of the permanent structure associated with the use of this temporary structure. If the permanent structure will exceed Title 14 of the Code of Federal Regulations, part 77.9, a separate aeronautical study and FAA determination is required.

This determination concerns the effect of this temporary structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Aviation Administration Flight Procedures Office if the structure is subject to the issuance of a Notice to Airmen (NOTAM).

If you have any questions, please contact our office at 1-404-305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-AEA-8685-OE

Signature Control No: 715496070-716407636 (TMP)
Kelly Nelson
Specialist

Proposal: To construct and/or operate a(n) Mobile Crane to a height of 260 feet above ground level, 289 feet above mean sea level.

Location: The structure will be located 2.28 nautical miles northwest of DCA Airport reference point.

Part 77 Obstruction Standard(s) Exceeded and Aeronautical Impacts, if any:
Section 77.17 (a) (2) by 60 feet - a height that exceeds 229 feet above mean sea level within 2.28 nautical miles of DCA.

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:
Section 77.19 (a) Horizontal Surface by 125 feet as applied to DCA.

Preliminary FAA study indicates that the above mentioned structure would:
have no effect on any existing or proposed arrival, departure, or en route instrument flight rules (IFR) operations or procedures.
not exceed traffic pattern airspace
have no physical or electromagnetic effect on the operation of air navigation and communications facilities.
have no effect on any airspace and routes used by the military.

Based on this aeronautical study, the structure would not constitute a substantial adverse effect on aeronautical operations or procedures because it will be temporary. The temporary structure would not be considered a hazard to air navigation provided all of the conditions specified in this determination are strictly met.

As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M Change 1, Obstruction Marking and Lighting, flags/red lights-Chapters 3(Marked),4,5(Red),14(Temporary),&15.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that the manager of RONALD REAGAN WASHINGTON NTL, (703) 417-8050 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site.

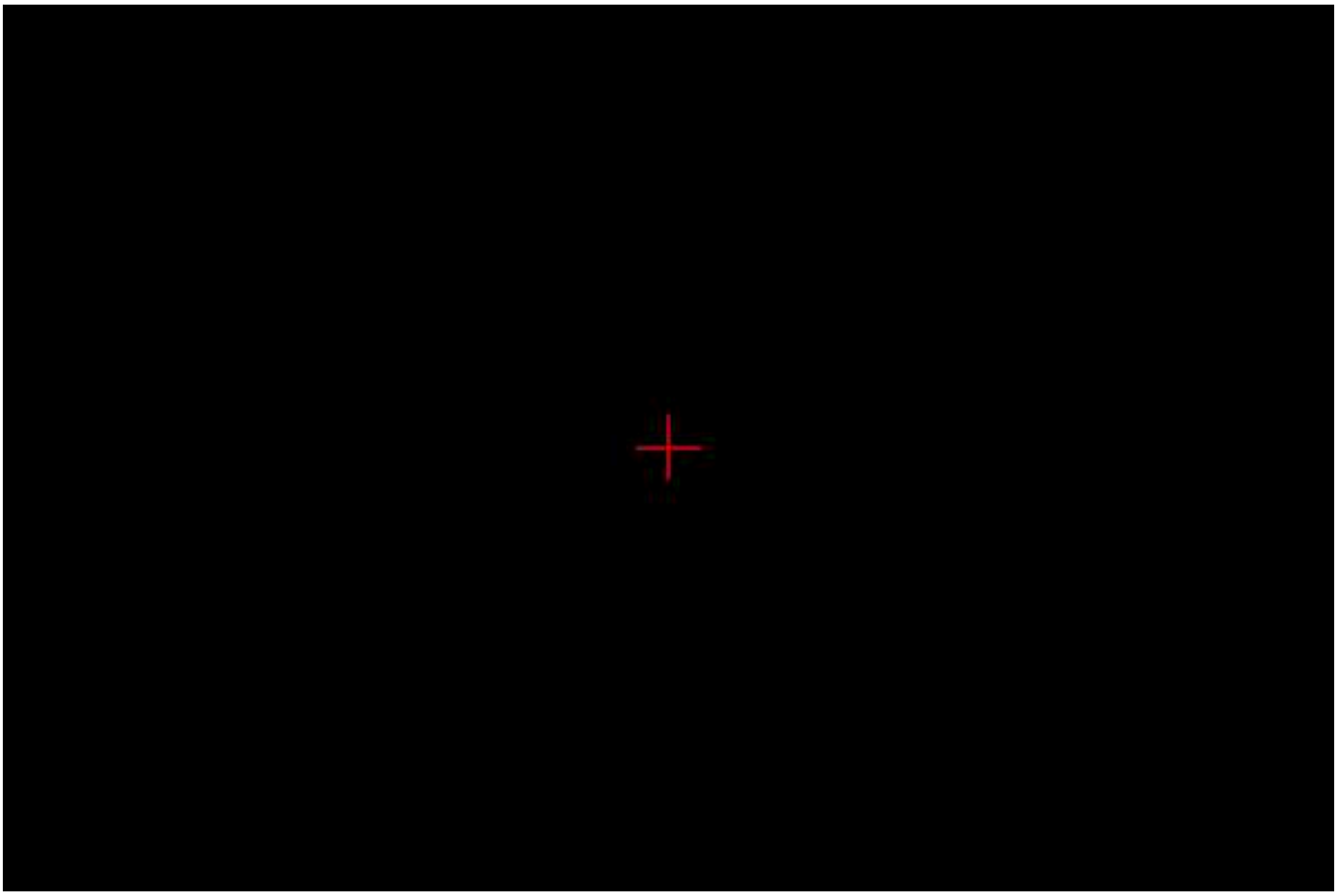
It is required that the manager of RONALD REAGAN WASHINGTON NTL ATCT, 703-413-0335 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site. Additionally, please provide contact information for the onsite operator in the event that Air Traffic Control requires the temporary structure to be lowered immediately.

This determination expires on 01/28/2028 unless extended, revised, or terminated by the issuing office.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed within 5 days after the temporary structure is dismantled.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

Sectional Map for ASN 2026-AEA-8685-OE



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-AEA-8628-OE

Issued Date: 07/28/2026

NATIONAL PARK SERVICE
NATIONAL PARK SERVICE
1849 C Street
Washington, DC 20240

**** NOTICE OF PRELIMINARY FINDINGS ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Building Monumental Arch
County, State: District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	AGL	AMSL
pt-1	38-53-09.13N	77-3-36.98W	32 Ft	173 Ft	205 Ft
pt-2	38-53-09.55N	77-3-35.83W	32 Ft	173 Ft	205 Ft
pt-3	38-53-07.97N	77-3-34.89W	32 Ft	173 Ft	205 Ft
pt-4	38-53-07.55N	77-3-36.04W	32 Ft	173 Ft	205 Ft
pt-5	38-53-08.61N	77-3-36.11W	32 Ft	260 Ft	292 Ft

Initial findings of this study indicate that the structure as described exceeds obstruction standards and/or would have an adverse physical or electromagnetic interference effect upon navigable airspace or air navigation facilities. Pending resolution of the issues described below, the structure is presumed to be a hazard to air navigation.

See Attachment for Additional information.

NOTE: PENDING RESOLUTION OF THE ISSUE(S) DESCRIBED ABOVE, THE STRUCTURE IS PRESUMED TO BE A HAZARD TO AIR NAVIGATION. THIS LETTER DOES NOT AUTHORIZE CONSTRUCTION OF THE STRUCTURE EVEN AT A REDUCED HEIGHT. ANY RESOLUTION OF THE ISSUE(S) DESCRIBED ABOVE MUST BE COMMUNICATED TO THE FAA SO THAT A FAVORABLE DETERMINATION CAN SUBSEQUENTLY BE ISSUED.

IF MORE THAN 60 DAYS FROM THE DATE OF THIS LETTER HAS ELAPSED WITHOUT ATTEMPTED RESOLUTION, IT WILL BE NECESSARY FOR YOU TO REACTIVATE THE STUDY BY FILING A NEW FAA FORM 7460-1, NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION.

If we can be of further assistance, please contact our office at 1-404-305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-AEA-8628-OE.

Signature Control No: 714939644-716400302 (NPF)
Kelly Nelson
Specialist

Attachment(s)
Additional Information

A full list of acronyms and abbreviations are available at the FAA's public website at https://www.faa.gov/about/abbreviations.

The proposed building project, consisting of five (5) points, would be located between 1.65 and 1.68 nautical miles (NM) northwest of the Ronald Reagan National (DCA), Arlington, VA, Runway (RWY) 15 landing threshold.

Each of the five building points have been studied separately using the following information:

PT1: 38-53-09.13N / 77-03-36.98W / 173 ft. above ground level (AGL) / 205 ft. above mean sea level (AMSL)
PT2: 38-53-09.55N / 77-03-35.83W / 173 ft. AGL / 205 ft. AMSL
PT3: 38-53-07.97N / 77-03-34.89W / 173 ft. AGL / 205 ft. AMSL
PT4: 38-53-07.55N / 77-03-36.04W / 173 ft. AGL / 205 ft. AMSL
PT5: 38-53-08.61N / 77-03-36.11W / 260 ft. AGL / 292 ft. AMSL

The proposed building project has been identified as an obstruction under the standards of Title 14, Code of Federal Regulations (CFR), Part 77, as applied to DCA as follows:

Section 77.17 (a)(2): A height that is 200 feet AGL, or above the established airport elevation, whichever is higher, within 3 nautical miles of the established reference point of an airport, excluding heliports, with its longest runway more than 3,200 feet in actual length, and that height increases in the proportion of 100 feet for each additional nautical mile from the airport up to a maximum of 499 feet. The proposed crane points would exceed by the following:

PT5: 60 feet (ft.)

Section 77.19 (a): Horizontal Surface. A horizontal plane 150 feet above the established airport elevation, the perimeter of which is constructed by swinging arcs of a specified radii from the center of each end of the primary surface of each runway of each airport and connecting the adjacent arcs by lines tangent to those arcs. The proposal would exceed the Horizontal Surface by the following:

PT3: 41 ft.
PT4: 41 ft.
PT5: 128 ft.

Section 77.19 (b): Conical surface. A surface extending outward and upward from the periphery of the horizontal surface at a slope of 20 to 1 for a horizontal distance of 4,000 feet. The proposals exceed the Conical Surface by the following:

PT1: 40 ft.
PT2: 41 ft.

Options for this study include the following:

1. Agree to reduce the height of the structures to:

PT1: 133 ft. AGL / 165 ft. AMSL

PT2: 132 ft. AGL / 164 ft. AMSL
PT3: 132 ft. AGL / 164 ft. AMSL
PT4: 132 ft. AGL / 164 ft. AMSL
PT5: 132 ft. AGL / 164 ft. AMSL

This height would eliminate all impacts. A favorable determination letter could be issued with a marking and lighting recommendation.

2. To pursue a favorable determination at the originally submitted height for all filings except the filings listed below, further study and coordination would be necessary. Further FAA study will involve a public notice circularization and 37-day comment period. The outcome cannot be predicted. A marking and lighting recommendation will be made if a favorable determination is issued.

3. Request termination of study and relocate the proposal.

Submit your response to Kelly.r.nelson@faa.gov. If the FAA does not receive a response to this letter within 60 days, the study will expire as noted on Page 1.

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-AEA-8583-OE

Issued Date: 08/06/2026

NATIONAL PARK SERVICE
NATIONAL PARK SERVICE
1849 C Street
Washington, DC 20240

****DETERMINATION OF NO HAZARD TO AIR NAVIGATION FOR TEMPORARY STRUCTURE****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Crane Tower Crane
County, State: District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	38-53-08.01N	77-3-35.32W	29 Ft	297 Ft	326 Ft

This aeronautical study revealed that the temporary structure does exceed obstruction standards but would not be a hazard to air navigation provided the condition(s), if any, in this letter is (are) met:

SEE ATTACHMENT FOR ADDITIONAL CONDITION(S) OR INFORMATION

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of a structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination did not include an evaluation of the permanent structure associated with the use of this temporary structure. If the permanent structure will exceed Title 14 of the Code of Federal Regulations, part 77.9, a separate aeronautical study and FAA determination is required.

This determination concerns the effect of this temporary structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Aviation Administration Flight Procedures Office if the structure is subject to the issuance of a Notice to Airmen (NOTAM).

If you have any questions, please contact our office at 1-404-305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-AEA-8583-OE

Signature Control No: 714710462-717910253 (TMP)
Kelly Nelson
Specialist

Proposal: To construct and/or operate a(n) Crane to a height of 297 feet above ground level, 326 feet above mean sea level.

Location: The structure will be located 2.29 nautical miles northwest of DCA Airport reference point.

Part 77 Obstruction Standard(s) Exceeded and Aeronautical Impacts, if any:
Section 77.17 (a) (2) by 97 feet - a height that exceeds 229 feet above mean sea level within 2.29 nautical miles of DCA.

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:
Section 77.19 (a) Horizontal Surface by 162 feet as applied to DCA.
Section 77.19 (d) Approach Surface by 27 feet as applied to DCA.

Preliminary FAA study indicates that the above mentioned structure would:
have no effect on any existing or proposed arrival, departure, or en route instrument flight rules (IFR) operations or procedures.
not exceed traffic pattern airspace
have no physical or electromagnetic effect on the operation of air navigation and communications facilities.
have no effect on any airspace and routes used by the military.

Based on this aeronautical study, the structure would not constitute a substantial adverse effect on aeronautical operations or procedures because it will be temporary. The temporary structure would not be considered a hazard to air navigation provided all of the conditions specified in this determination are strictly met.

As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M Change 1, Obstruction Marking and Lighting, flags/red lights-Chapters 3(Marked),4,5(Red),14(Temporary),&15.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that the manager of RONALD REAGAN WASHINGTON NTL, (703) 417-8050 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site.

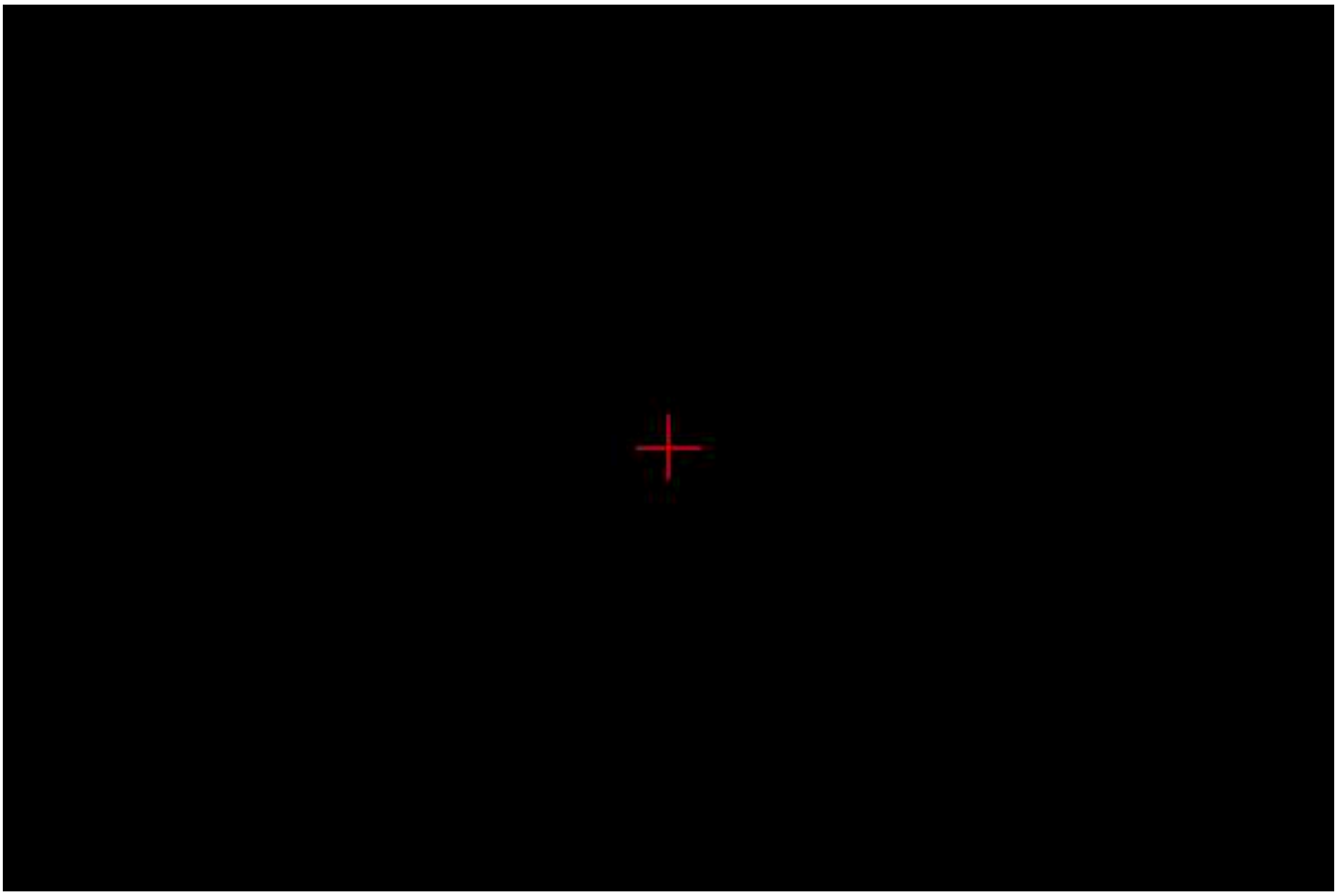
It is required that the manager of RONALD REAGAN WASHINGTON NTL ATCT, 703-413-0335 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site. Additionally, please provide contact information for the onsite operator in the event that Air Traffic Control requires the temporary structure to be lowered immediately.

This determination expires on 02/06/2028 unless extended, revised, or terminated by the issuing office.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed within 5 days after the temporary structure is dismantled.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

Sectional Map for ASN 2026-AEA-8583-OE



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-AEA-8584-OE

Issued Date: 08/06/2026

NATIONAL PARK SERVICE
NATIONAL PARK SERVICE
1849 C Street
Washington, DC 20240

****DETERMINATION OF NO HAZARD TO AIR NAVIGATION FOR TEMPORARY STRUCTURE****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Crane Assist Crane
County, State:	District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	38-53-08.09N	77-3-35.04W	29 Ft	310 Ft	339 Ft

This aeronautical study revealed that the temporary structure does exceed obstruction standards but would not be a hazard to air navigation provided the condition(s), if any, in this letter is (are) met:

SEE ATTACHMENT FOR ADDITIONAL CONDITION(S) OR INFORMATION

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of a structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination did not include an evaluation of the permanent structure associated with the use of this temporary structure. If the permanent structure will exceed Title 14 of the Code of Federal Regulations, part 77.9, a separate aeronautical study and FAA determination is required.

This determination concerns the effect of this temporary structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Aviation Administration Flight Procedures Office if the structure is subject to the issuance of a Notice to Airmen (NOTAM).

If you have any questions, please contact our office at 1-404-305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-AEA-8584-OE

Signature Control No: 714711573-717911151 (TMP)
Kelly Nelson
Specialist

Proposal: To construct and/or operate a(n) Crane to a height of 310 feet above ground level, 339 feet above mean sea level.

Location: The structure will be located 2.29 nautical miles northwest of DCA Airport reference point.

Part 77 Obstruction Standard(s) Exceeded and Aeronautical Impacts, if any:
Section 77.17 (a) (2) by 110 feet - a height that exceeds 229 feet above mean sea level within 2.29 nautical miles of DCA.

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:
Section 77.19 (a) Horizontal Surface by 175 feet as applied to DCA.
Section 77.19 (d) Approach Surface by 40 feet as applied to DCA.

Preliminary FAA study indicates that the above mentioned structure would:
have no effect on any existing or proposed arrival, departure, or en route instrument flight rules (IFR) operations or procedures.
not exceed traffic pattern airspace
have no physical or electromagnetic effect on the operation of air navigation and communications facilities.
have no effect on any airspace and routes used by the military.

Based on this aeronautical study, the structure would not constitute a substantial adverse effect on aeronautical operations or procedures because it will be temporary. The temporary structure would not be considered a hazard to air navigation provided all of the conditions specified in this determination are strictly met.

As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M Change 1, Obstruction Marking and Lighting, flags/red lights-Chapters 3(Marked),4,5(Red),14(Temporary),&15.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that the manager of RONALD REAGAN WASHINGTON NTL, (703) 417-8050 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site.

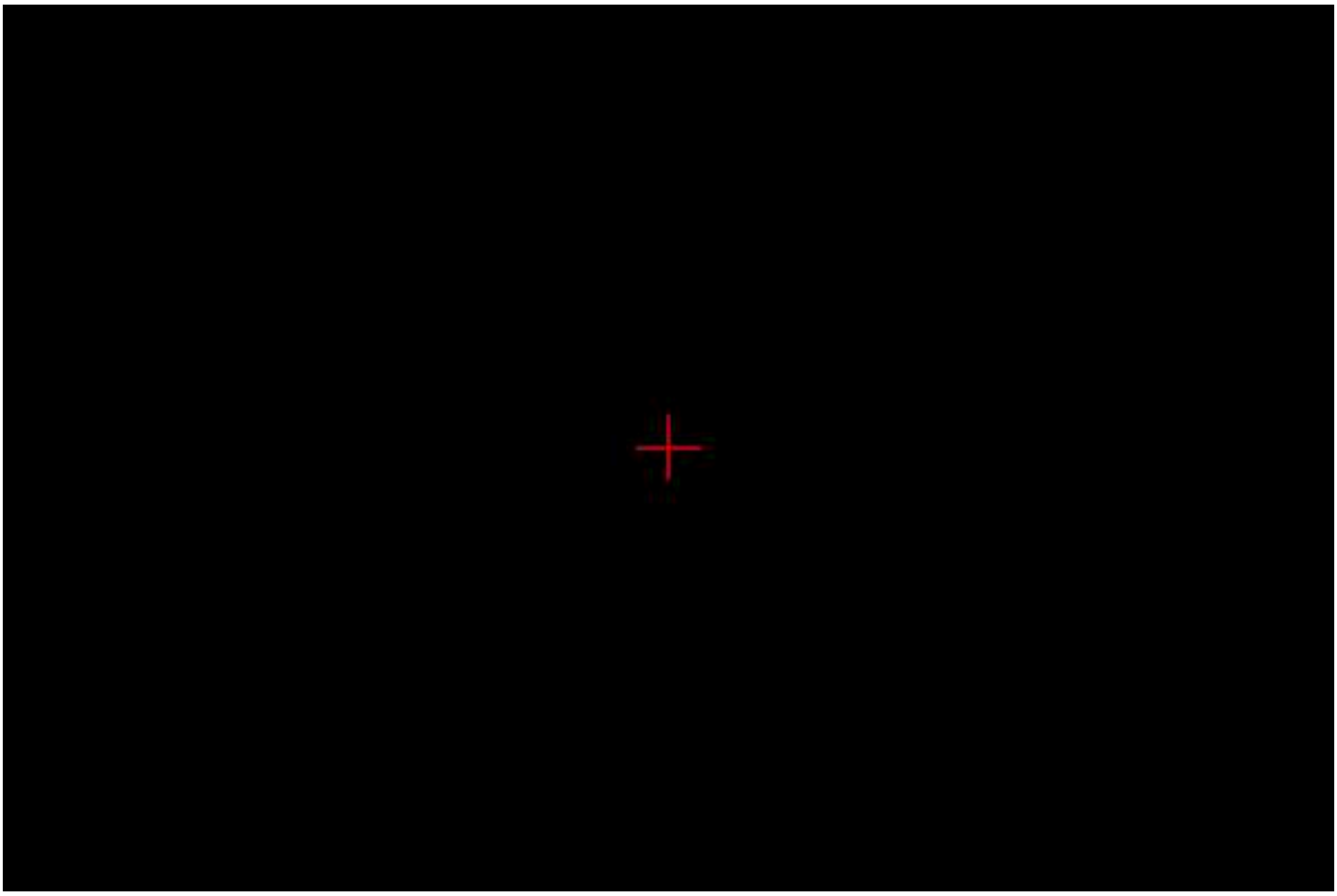
It is required that the manager of RONALD REAGAN WASHINGTON NTL ATCT, 703-413-0335 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site. Additionally, please provide contact information for the onsite operator in the event that Air Traffic Control requires the temporary structure to be lowered immediately.

This determination expires on 02/06/2028 unless extended, revised, or terminated by the issuing office.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed within 5 days after the temporary structure is dismantled.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

Sectional Map for ASN 2026-AEA-8584-OE



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-AEA-8628-OE

Issued Date: 09/18/2026

NATIONAL PARK SERVICE
NATIONAL PARK SERVICE
1849 C Street
Washington, DC 20240

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Building Monumental Arch
County, State: District of Columbia, District of Columbia

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	38-53-09.13N	77-3-36.98W	32 Ft	173 Ft	205 Ft
pt-2	38-53-09.55N	77-3-35.83W	32 Ft	173 Ft	205 Ft
pt-3	38-53-07.97N	77-3-34.89W	32 Ft	173 Ft	205 Ft
pt-4	38-53-07.55N	77-3-36.04W	32 Ft	173 Ft	205 Ft
pt-5	38-53-08.61N	77-3-36.11W	32 Ft	260 Ft	292 Ft

This aeronautical study revealed that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. Therefore, pursuant to the authority delegated to me, it is hereby determined that the structure would not be a hazard to air navigation provided the following condition(s) is(are) met:

As a condition to this Determination, the structure is to be marked/lighted with lighting, as noted below.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

__X__ At least 10 days prior to start of construction (7460-2, Part 1)
__X__ Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

See attachment for additional condition(s) or information.

This determination expires on 03/18/2028 unless:

(a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
(b) extended, revised, or terminated by the issuing office.
(c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is subject to review if an interested party files a petition that is received by the FAA on or before October 18, 2026. In the event an interested party files a petition for review, it must contain a full statement of the basis upon which the petition is made. Petitions can be submitted to the Manager, Rules and Regulations Group via email at OEPetitions@faa.gov, or via mail to Federal Aviation Administration, Air Traffic Organization, Rules and Regulations Group, 5th floor, 600 Independence Ave, SW., Washington, DC 20597. FAA encourages the use of email to ensure timely processing.

This determination becomes final on October 28, 2026 unless a petition is timely filed. In which case, this determination will not become final pending disposition of the petition. Interested parties will be notified of the grant of any review. Any questions regarding your petition, contact Rules and Regulations Group via telephone (202) 267-8783.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

This aeronautical study considered and analyzed the impact on existing and proposed arrival, departure, and en route procedures for aircraft operating under both visual flight rules and instrument flight rules; the impact

on all existing and planned public-use airports, military airports and aeronautical facilities; and the cumulative impact resulting from the studied structure when combined with the impact of other existing or proposed structures. The study disclosed that the described structure would have no substantial adverse effect on air navigation.

An account of the study findings, aeronautical objections received by the FAA during the study (if any), and the basis for the FAA's decision in this matter can be found on the following page(s).

If we can be of further assistance, please contact Kelly Nelson, at 1-404-305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-AEA-8628-OE.

Signature Control No: 714939644-725003318 (DNH)
Julie A. Morgan
Manager, Obstruction Evaluation Group

Attachment(s)
Additional Information
Map(s)

A full list of acronyms and abbreviations are available at the FAA's public website at https://www.faa.gov/about/abbreviations.

1. LOCATION OF PROPOSED CONSTRUCTION

The proposed building project, consisting of five (5) points, would be located between 1.65 and 1.68 nautical miles (NM) northwest of the Ronald Reagan Washington National Airport (DCA), Arlington, VA, Runway (RWY) 15 landing threshold.

Each of the five building points have been studied separately using the following information:

PT1: 38-53-09.13N / 77-03-36.98W / 173 ft. above ground level (AGL) / 205 ft. above mean sea level (AMSL)
PT2: 38-53-09.55N / 77-03-35.83W / 173 ft. AGL / 205 ft. AMSL
PT3: 38-53-07.97N / 77-03-34.89W / 173 ft. AGL / 205 ft. AMSL
PT4: 38-53-07.55N / 77-03-36.04W / 173 ft. AGL / 205 ft. AMSL
PT5: 38-53-08.61N / 77-03-36.11W / 260 ft. AGL / 292 ft. AMSL

2. OBSTRUCTION STANDARDS EXCEEDED

The proposed building project has been identified as an obstruction under the standards of Title 14, Code of Federal Regulations (CFR), Part 77, as applied to DCA:

Section 77.17 (a)(2): A height that is 200 feet AGL, or above the established airport elevation, whichever is higher, within 3 nautical miles of the established reference point of an airport, excluding heliports, with its longest runway more than 3,200 feet in actual length, and that height increases in the proportion of 100 feet for each additional nautical mile from the airport up to a maximum of 499 feet. The proposed crane points would exceed by the following:

PT5: 60 feet (ft.)

Section 77.19 (a): Horizontal Surface. A horizontal plane 150 feet above the established airport elevation, the perimeter of which is constructed by swinging arcs of a specified radii from the center of each end of the primary surface of each runway of each airport and connecting the adjacent arcs by lines tangent to those arcs. The proposal would exceed the Horizontal Surface by the following:

PT3: 41 ft.
PT4: 41 ft.
PT5: 128 ft.

Section 77.19 (b): Conical surface. A surface extending outward and upward from the periphery of the horizontal surface at a slope of 20 to 1 for a horizontal distance of 4,000 feet. The proposals exceed the Conical Surface by the following:

PT1: 40 ft.
PT2: 41 ft.

3. EFFECT ON AERONAUTICAL OPERATIONS

Aeronautical study disclosed that the proposal would have no effects on existing or proposed arrival, departure, or en route instrument flight rule (IFR) operations, minimum flight altitudes, minimum vectoring altitudes

(MVA), aeronautical procedures, or aeronautical facilities at DCA or at any other known public use or military airport. Information on the proposals shall be forwarded for appropriate aeronautical charting.

4. CIRCULARIZATION AND COMMENTS RECEIVED

In order to facilitate the public comment process, the study was circularized on July 28, 2026, to all known aviation interests and to non-aeronautical interests that may be affected by the proposals. One response was received as a result of the circularization. The comments are summarized below.

Comment 1: A comment indicated that the proposed structure limits aircraft maneuverability during runway 19 instrument approaches (including RNAV, River Visual 19, and LDA procedures) due to its proximity to Prohibited Area 56 (P-56).

Response: The proposed structure will not restrict aircraft maneuverability during instrument approach procedures to RWY 19 at DCA. Published minimum and recommended altitudes throughout these approach procedures remain well above the proposed structure's height. Furthermore, the site is situated approximately 0.47 NM west of the nearest boundary of P-56, ensuring adequate lateral separation from restricted airspace.

Comment 2: A comment stated that DCA RWY 1 departures require an immediate left turn toward the Arch. Meeting One Engine Inoperative (OEI) obstacle avoidance requirements may force operators to reduce takeoff weight, delay departures during low visibility/ceilings, require excessive climb gradients, decline SIDs/ODPs, or cancel flights.

Response: OEI obstacle departure profiles fall outside the regulatory scope of 14 CFR Part 77. Part 77 establishes standard imaginary surfaces intended to safeguard aircraft during normal operating conditions. Conversely, OEI procedures address contingency scenarios and are developed by individual air carriers to account for specific aircraft weights, payloads, environmental conditions, and fleet performance characteristics. Because these escape paths are carrier-specific, proprietary, and highly variable, they are not evaluated under Part 77 airspace studies.

Comment 3: A comment stated that the MT Vernon Visual RWY 1 procedure lacks a missed approach procedure, creating a high collision risk with the Arch and potential delays or evasive actions during a go-around. Runway 1 instrument approach missed procedures require an immediate climbing left turn toward the Arch's location to avoid P-56, leaving limited options to safely amend missed approach procedures.

Response: Though the proposed structure is located northwest of the departure end of Runway 1 at DCA, an analysis of historical DCA flight track data indicates that missed approach operations rarely enter the immediate project area, with no recorded overflights. Furthermore, the closest aircraft executing a missed approach in the proximity of the project area maintained an altitude of 2,000 feet AMSL. Consequently, operational data does not suggest that fixed-wing or rotary-wing aircraft would require flight path modifications upon completion of the proposed construction.

Comment 4: A comment stated that required Part 77 obstruction lighting combined with planned decorative monument lighting will increase pilot night-vision impairment, hinder the ability to identify other aircraft at night, and cause severe glare during arrivals and departures.

Response: The obstruction lighting recommended for the proposed structure will be Night Vision Goggle (NVG) compatible. Additionally, glint and glare evaluations fall outside the regulatory scope of 14 CFR Part 77 for off-airport aeronautical studies. In the event of any lighting outage, the structure owner is required

to immediately submit an obstruction NOTAM to notify pilots of the unlit structure until repairs and/or maintenance are completed.

Comment 5: A comment stated that the OE/AAA study evaluates the Arch as a standalone case rather than accounting for the cumulative effects and risks of structures in heavily constrained airspace

Response: The FAA evaluates each Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) filing on an individual basis, incorporating all existing structures into the aeronautical study baseline. Based on this evaluation, the proposed structure introduces no additional aeronautical impact beyond that of existing structures in the surrounding area.

Comment 6: The Arch will reduce overall DCA airport capacity and throughput while threatening flight safety. ALPA opposes mitigations that increase pilot workload (such as raised minima, excessive climb gradients, or complex visual procedures).

Response: The proposed structure was evaluated under the standards of 14 CFR Part 77 and FAA Order JO 7400.2. The evaluation confirmed that the structure does not require an increase to published instrument approach procedure minima, nor does it necessitate excessive climb gradients or complex visual flight procedures for aircraft operating at the airport. Furthermore, concerns regarding general airport capacity and operational throughput fall outside the regulatory scope of 14 CFR Part 77 aeronautical studies.

Comment 7: A comment states that flying the LDA RWY 19 procedure requires navigating a step-down fix and a 40-degree right turn close to the runway, which significantly increases pilot workload to maintain a stable approach while avoiding the proposed structure.

Response: Regarding the LDA RWY 19 approach at DCA, the step-down fix WEVPU is located prior to the location of the proposed structure. Per the Standard Instrument Approach Procedure (SIAP), aircraft must cross WEVPU at or above 1,100 feet AMSL. Because the proposed structure is situated between the WEVPU and ZAXEB fixes, aircraft on this segment may descend to the Minimum Descent Altitude (MDA) of 780 feet AMSL. With a proposed maximum height of 292 feet AMSL, the structure provides 488 feet of vertical clearance below the MDA segment floor. Furthermore, the required 40-degree visual alignment turn, which initiates at ZAXEB, occurs well past the location of the proposed structure.

5. DETERMINATION - NO HAZARD TO AIR NAVIGATION. It is determined that the proposal would not have a substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on any air navigation facility and would not be a hazard to air navigation as long as all conditions written within this determination are met.

6. BASIS FOR DECISION

Study for possible visual flight rules (VFR) effect disclosed the proposal would exceed section 77.17 (a) 2, 77.19 (a) horizontal surface and 77.19 (b) conical surface, as noted above; but would have no greater effect on any existing or proposed arrival or departure VFR operations or procedures when compared to either existing terrain or other existing obstructions in proximity to the proposal. The proposal would not conflict with any airspace required to conduct normal VFR traffic pattern and/or visual approach operations at DCA or at any other public-use, joint-use, or military airport. Therefore, at the heights listed above, the proposed structure would have no substantial adverse effects on any existing or proposed VFR arrival, VFR departure, en route, minimum flight altitudes, or VFR helicopter routes in the vicinity of this location.

The cumulative impact of the proposal, when combined with other proposed and existing structures, is not considered to be significant. Study did not disclose any adverse effects on existing or proposed public-use or military airports or navigational facilities, nor do the proposals affect the capacity of any known existing or planned public-use or military airport.

7. CONDITIONS

The proposed structure should be appropriately marked/lighted with a non-standard eternal flame and continuously floodlighted by searchlight projectors installed at three or more equidistant points around the base of the structure. The searchlight projectors should provide an average illumination of at least 15 foot-candles (161.46 lux) over the top one-third of the structure, in accordance with FAA AC 70/7460-1N, Paragraph 4.5, to make it more conspicuous to airmen.

Sectional Map for ASN 2026-AEA-8628-OE

