

Triumphal Arch Project

Public Comment Summary Report

A public comment period for the proposed Triumphal Arch project was conducted from June 5, 2026, to June 15, 2026, in accordance with the National Historic Preservation Act (NHPA) Section 106 regulations. 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 this period.

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 commentors. 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 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, imperial, or authoritarian monuments and is not rooted in American traditions, diminishing the symbolism and integrity of the Lincoln Memorial and its surrounding landscape.

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 National Park Service'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.

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, 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; the solemn approach is central to visitor experience.

Some commenters asserted that the arch would visually overshadow graves, funeral processions, and the contemplative setting of Arlington National Cemetery, with 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.

Beneficial Effects

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

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.

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.

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.

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 high-speed 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 had 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."

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.

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.

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.

Beneficial Effects

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

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.

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. 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 commentors also asserted that NPS failed to analyze potential effects on the Old Naval Observatory NHL and incorrectly conflated the Quarters 1 NHL, and the Fort Myer NHL.

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.

Other Historic Properties

Some commentors 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 commentors asserted the NPS omitted include the 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.

Beneficial Effects

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

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 in order to avoid permanent visual obstruction.

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 National Park Service'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.

Commentors 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.

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.

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

Archeology

Some commenters recommended conducting archaeological studies where relevant.

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 ceremonial flyovers, and that constructing the Arch would largely eliminate this longstanding public use.

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.

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.

Traffic and Circulation

Adverse Effects

Some commenters asserted that construction would cause substantial and prolonged traffic disruptions, including multi-year 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.

Beneficial Effects

Some commenters asserted that the project could improve pedestrian safety.

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.

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.

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.

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.

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.

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.

Proposed Alternatives or Mitigations Related to Arch Design and Scale

Some commenters asserted that the arch should be redesigned without gold accents, or re-envisioned 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.

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.

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

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.

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.

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.

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.

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.

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.

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.

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.

Commentors 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 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.

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.

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.

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.