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
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Approved:

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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.