National Park Service
US Department of the Interior

George Washington Memorial Parkway

DECISION RECORD

TRIUMPHAL ARCH AT MEMORIAL CIRCLE

1. DECISION

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

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

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

1.1. Description of the Selected Action

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

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

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

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

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

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

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

Changes to Vehicle, Pedestrian, and Bicycle Use

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

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

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

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

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

Signalization-related changes include the following:

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

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

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

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

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

Construction Phasing

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

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

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

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

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

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

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

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

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

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

Staging Areas

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

Utility Installation

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

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

Stormwater Management Actions

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

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

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

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

Groundwater and Dewatering Approach

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

Soil Excavation

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

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

Construction Equipment and Work Hours

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

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

Road Closures and Transportation Routes

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

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

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

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

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

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

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

Visitor Access and Visitor Facilities at the Triumphal Arch

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

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

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

National Security uses

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

1.2 Authority

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

2. CONSULTATION

2.1. National Historic Preservation Act

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

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

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

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

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

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

2.2 Endangered Species Act

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

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

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

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

2.4 United States Commission of Fine Arts

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

2.5 National Capital Planning Commission

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

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

2.6 Federal Aviation Administration

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

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

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

3. PUBLIC INVOLVEMENT

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

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

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

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

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

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

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

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

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

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

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

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

5. RATIONALE FOR DECISION

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

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

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

6. APPROVAL

Recommended:

JESSICA BOWRON

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

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

Approved:

NOV 05 2026

Doug Burgum, United States Secretary of the Interior

APPENDICES

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

REVISED FINDING OF NO SIGNIFICANT IMPACT

(SEPARATE FILE)

APPENDIX B

MITIGATIONS

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

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

D.1. General Mitigations

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

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

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

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

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

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

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

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

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

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

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

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

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

D.2. Mitigations Applying to Historic Properties

Construction Management Control

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

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

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

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

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

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

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

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

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

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

Archaeological Investigation

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

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

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

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

Park Improvements

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

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

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

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

Documentation

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

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

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

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

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

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

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

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

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

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

Interpretation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX C

NON-IMPAIRMENT DETERMINATION

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

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

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

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

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

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

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

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

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

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

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

PURPOSE AND FUNDAMENTAL RESOURCES AND VALUES OF GEORGE WASHINGTON MEMORIAL PARKWAY

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

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

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

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

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

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

NON-IMPAIRMENT DETERMINATION

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

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

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

Cultural Resources – Historic Views

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

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

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

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

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

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

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

Cultural Resources – Cultural Landscapes and Historic Districts

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

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

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

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

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

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

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

Cultural Resources – Archaeology

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

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

Water Resources

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

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

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

Noise

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

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

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

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

Night Skies

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

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

APPENDIX D

TRIUMPHAL ARCH PROJECT

PUBLIC COMMENT RESPONSE SUMMARY REPORT

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

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

CULTURAL RESOURCES

Lincoln Memorial

Adverse Effects

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

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

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

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

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

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

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

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

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

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

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

Proposed Alternatives or Mitigations related to the Lincoln Memorial

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

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

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

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

Arlington National Cemetery

Adverse Effects

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

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

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

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

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

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

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

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

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

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

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

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

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

Beneficial Effects

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

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

Proposed Alternatives or Mitigations Related to Arlington National Cemetery

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

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

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

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

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

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

Arlington House

Adverse Effects

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

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

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

Proposed Alternatives or Mitigations Related to Arlington House

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

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

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

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

George Washington Memorial Parkway and Memorial Circle

Adverse Effects

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Beneficial Effects

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

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

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

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

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

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

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

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

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

National Mall

Adverse Effects

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

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

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

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

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

NPS has complied with all required planning reviews and approvals.

Beneficial Effects

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

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

Proposed Alternatives or Mitigations Related to the National Mall

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

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

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

National Historic Landmarks

Adverse Effects

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

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

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

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

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

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

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

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

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

Historic Bridges

Adverse Effects

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

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

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

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

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

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

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

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

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

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

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

Proposed Alternatives or Mitigations Related to Historic Bridges

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

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

Other Historic Properties

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

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

Views and Viewsheds - Generally

Adverse Effects

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

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

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

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

Beneficial Effects

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

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

Proposed Alternatives or Mitigations Related to Views and Viewsheds

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

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

Cultural Landscapes - Generally

Adverse Effects

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

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

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

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

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

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

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

Proposed Alternatives or Mitigations Related to Cultural Landscapes

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

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

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

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

Archaeology

Some commenters recommended conducting archaeological studies where relevant.

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

VISITOR EXPERIENCE, ACCESS, AND SAFETY CONCERNS

Visitor Experience

Adverse Effects

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

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

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

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

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

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

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

Beneficial Effects

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

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

Proposed Alternatives or Mitigations Related to Visitor Experience

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

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

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

Traffic and Circulation

Adverse Effects

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

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

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

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

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

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

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

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

Beneficial Effects

Some commenters asserted that the project could improve pedestrian safety.

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

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

Proposed Alternatives or Mitigations Related to Traffic and Circulation

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

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

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

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

Health and Safety

Adverse Effects

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

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

Aviation Safety

Adverse Effects

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

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

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

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

Proposed Alternatives or Mitigations Related to Aviation Safety

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

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

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

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

PROJECT DESIGN AND LOCATION

Arch Design and Scale

Adverse Effects

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

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

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

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

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

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

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

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

Beneficial Effects

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

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

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

Proposed Alternatives or Mitigations Related to Arch Design and Scale

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

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

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

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

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

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

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

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

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

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

Arch Location – Generally

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

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

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

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

ENVIRONMENTAL CONCERNS

Lady Bird Johnson Park

Adverse Effects

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

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

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

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

Proposed Alternatives or Mitigations Related to Lady Bird Johnson Park

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

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

Water Quality

Adverse Effects

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

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

Proposed Alternatives or Mitigations Related to Water Quality

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

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

Air Quality

Adverse Effects

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

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

Environmental – General

Adverse Effects

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

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

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

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

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

Proposed Alternatives or Mitigations Related to Environmental Issues-General

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

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

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

DECISION MAKING PROCESS & PUBLIC INPUT

Public Review and Input

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

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

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

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

Beneficial Effects

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

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

Proposed Alternatives or Mitigations Related to Public Review and Input

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

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

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

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

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

SOCIOECONOMICS, OPERATIONS

Socioeconomics

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

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

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

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

National Park Service Operations

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

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

REFERENCE:

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

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

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

APPENDIX E

NATIONAL HISTORIC PRESERVATION ACT CONSULTATION CORRESPONDENCE

(SEPARATE FILE)

APPENDIX F

ENDANGERED SPECIES ACT AND MIGRATORY BIRD TREATY ACT CONSULTATION DOCUMENTATION

(SEPARATE FILE)

APPENDIX G

CONSULTATION WITH THE COMMISSION OF FINE ARTS

(SEPARATE FILE)

APPENDIX H

CONSULTATION WITH THE NATIONAL CAPITAL PLANNING COMMISSION

(SEPARATE FILE)

APPENDIX I

FEDERAL AVIATION ADMINISTRATION REPORTS

(SEPARATE FILE)