Executive Director's Recommendation

Commission Meeting: November 5, 2026

PROJECT
New Monumental Arch
George Washington Memorial Parkway
Memorial Avenue
Washington, DC

SUBMITTED BY
United States Department of the Interior

REVIEW AUTHORITY
Federal Projects in the District
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
8778

NCPC MAP FILE NUMBER
1.45(73.10)46221

APPLICANT'S REQUEST
Approval of final site and building plans

PROPOSED ACTION
Approve final site and building plans with comments

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The U.S. Department of the Interior (the "applicant") has submitted the final site and building plans for a new monumental arch to be located in Memorial Circle for Commission approval. The Commission approved the preliminary plans at the July 9, 2026 meeting and provided comments on the concept plans at the June 4, 2026 meeting. The applicant proposes an arch topped with gold statuary in the center of Memorial Circle in Washington, DC. The overall height from the base to the top of the statuary is 250 feet.

Memorial Circle is located on Columbia Island, which is within the boundary channel of Washington, DC. Construction of the circle began in 1940. It sits at the west terminus of Arlington Memorial Bridge, which was designed by the architectural firm McKim, Mead, & White and opened in 1932. In response to the Commission's previous requests, the applicant has provided final details regarding various topics, including the site and building design, height, circulation, and lighting.

KEY INFORMATION

- The Arlington Memorial Bridge (Memorial Bridge) spans the Potomac River and provides a connection between the Lincoln Memorial on the east and Arlington National Cemetery on the west via Memorial Circle and Memorial Avenue. The bridge, including Memorial Circle, was designed to create a physical and symbolic connection between the North and South.
- Prior to construction, the design of Memorial Circle went through multiple design iterations that began as a formal space with decorative pillars on either side of the axial view to the current design of a traffic circle within oval loops connecting it to area roadways.

- The Memorial Bridge was restored between 2019-2023 to address structural, aesthetic and functional issues. Memorial Circle was not included in this restoration.
- In 1980 the bridge, including Memorial Circle, was listed on the National Register of Historic Places for its architectural characteristics and innovative engineering.
- The sight line, design, and landscape features of Memorial Avenue, which includes Memorial Circle, are contributing elements of the National Register-listed Arlington National Cemetery Historic District and Arlington Memorial Bridge.
- The Memorial Circle is administered and maintained by the George Washington Memorial Parkway, a unit of the National Park Service (NPS).
- The proposed project includes a 166-foot-tall arch structure topped with three gilded figures which extend to an overall height of 250 feet.
- Access to the arch is proposed by the applicant at ground level using new pedestrian refuge island areas, crosswalks, and traffic signals.
- The Commission provided comments on the concept plans for the project at the June 4, 2026 meeting and approved the preliminary design with comments at the July 9, 2026 meeting.
- The U.S. Commission of Fine Arts approved the concept plan for the proposed arch with comments at the April 16, 2026 meeting. The final design was approved at their May 21, 2026 meeting.

RECOMMENDATION

The Commission:

Approves the final site and building plans for the proposed Monumental Arch, located at Memorial Circle on Columbia Island in Washington, DC.

Supports the purpose of the project to celebrate America's Semiquincentennial.

Notes the general site was identified as a location for potential design features as part of the McMillan Commission (1902) and Arlington Bridge Commission (1925); and

Notes that, in response to the Commission's requests at preliminary review, the applicant has provided additional information regarding various topics as outlined in this report and further detailed in the analysis.

Arch Height

Notes that the Commission requested a justification for the project's height at the preliminary review and the applicant has provided a justification.

Notes that while the Commission previously considered the question of applicability of the Height of Buildings Act to the federal government, a conclusion to that question is not needed for the project here before the Commission.

Notes that, upon consideration of the supplemental materials submitted by the applicant and deliberated among the Commissioners, the Commission agrees that in 1925 Congress authorized a plan submitted by the Arlington Memorial Bridge Commission in 1924 that included elements above the limit prescribed by the 1910 Height of Buildings Act and gave the Arlington Bridge Commission the discretion to revise the design, which discretion is now exercised by the Department of the Interior.

Finds that, based on the submitted materials and deliberations by the Commission, because Congress implicitly waived the Height of Buildings Act in its 1925 action, the revised design is not required to comply with the Height of Buildings Act.

Approves the final height of the project as proposed by the applicant.

Pedestrian Accessibility

Notes the applicant has submitted an updated traffic study that evaluates the proposed pedestrian access to ensure that visitors can avoid pedestrian and vehicular conflicts and reduces the number of individual traffic signal poles from 32 to 17 as requested by the Commission.

Supports the reduction of the number of signal poles which helps remove visual clutter and maintain pedestrian and vehicular safety.

Vehicular Network

Notes that the applicant has prepared an updated traffic study that identifies potential impacts from the project on the road network and level of service, identifies potential traffic delays and alternate routes from the removal of northbound and westbound movements around Memorial Circle, and the broader impacts of the long-term traffic modifications as requested by the Commission.

Finds that while the project may alter overall vehicular traffic movement around the circle and increase delays on Washington Boulevard from the south, the design will improve pedestrian and bicycle safety and circulation around Memorial Circle as compared to current conditions.

Notes that the applicant has stated that further refinement of traffic signal timing will occur as visitation to the arch is better understood.

Encourages the applicant to continue to work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate, regarding the proposed changes and impacts to the surface transportation network through construction and project implementation.

Loading/Unloading

Notes that the Commission requested the applicant provided details regarding pick-up, drop-off, and loading locations, and coordinate with Arlington National Cemetery regarding the use of Memorial Avenue and the cemetery parking garage for visitor parking.

Notes that the applicant has submitted updated information regarding parking and loading/unloading for visitors to the arch that proposes utilizing the Arlington National Cemetery Garage for visitor parking and Memorial Avenue for visitor pick up and drop off.

Encourages the applicant to continue coordination with Arlington National Cemetery regarding the use of the Memorial Avenue and the cemetery parking garage for arch visitor parking as the project is implemented.

Aviation Safety

Notes the Commission requested the final plans include any navigational or safety lighting as required by the Federal Aviation Administration.

Notes the Federal Aviation Administration provided the applicant with a *Determination of no hazard to air navigation* finding for the proposed arch with a condition for safety lighting that includes a non-standard eternal flame and continuous floodlighting by searchlight projectors installed at three or more equidistant points to provide illumination to the top one-third of the structure which are included in the final submission.

Project Design and Materials

Notes that the Commission previously requested the applicant provide a narrative describing the proposed lighting concept and its relationship to the Lincoln Memorial and Arlington National Cemetery that includes relevant details on the proposed lighting stanchions and any other site lighting, including illumination levels proposed (foot lambers, or other measure) to understand the relative brightness of the monument as compared to other national monuments and memorials, and to protect the lighting hierarchy of the National Mall.

Notes that the applicant submitted the final lighting plan that includes architectural accent lighting at the building crown and underside of the arch, and to up-light the statuary, six ground-mounted light stanchions around the circle to ensure the arch is brilliantly illuminated and to meet Federal Aviation Administration (FAA) requirements.

Notes the proposed lighting levels have been designed to maintain approximately 15 footcandles at elevations of 150 feet and higher to eliminate the need for FAA aircraft warning lights.

Notes the applicant will utilize either Sierra White granite, Bethel White granite, Barre Granite, or Carrara Marble based on availability and the procurement process.

Encourages the applicant to monitor and refine the proposed lighting plan after implementation to ensure a balance between required lighting and the project's setting.

Encourages the applicant to continuously monitor the noise level of construction activities to minimize impacts to Arlington National Cemetery.

Project Coordination

Notes the applicant is lead federal agency for the preparation of an Environmental Assessment (EA) and Finding of No Significant Impact pursuant to the National Environmental Policy Act, and NCPC utilized the applicant's EA for purposes of compliance with the Act.

Notes the applicant submitted a final Environmental Assessment and final Finding of No Significant Impact.

Adopts the Environmental Assessment prepared by the National Park Service, dated October 2026 for use by the Commission.

Notes the National Park Service initiated the Section 106 process of the National Historic Preservation Act on June 5, 2026, with a draft Assessment of Effects and Programmatic Agreement and held consulting parties meetings on June 15 and September 9, 2026. The Advisory Council on Historic Preservation advised that it was terminating consultation for the project on September 24, 2026 and provided final comments to the applicant on October 9, 2026, which the applicant acknowledged as received on October 9, 2026, which concluded the Section 106 process.

Notes NCPC designated the National Park Service as lead federal agency for the purpose of compliance with the Section 106 process of the National Historic Preservation Act on June 10, 2026.

PROJECT REVIEW TIMELINE

Previous actions	**June 4, 2026** – Comments on concept plans **July 9, 2026 –** Approved preliminary site and buildings plans
Remaining actions (anticipated)	– None

PROJECT ANALYSIS

Executive Summary

The U.S. Department of the Interior has submitted final plans for a new monumental arch in Memorial Circle, located on Columbia Island in Washington, DC. Per the submission, the overall design is 250 feet tall and consists of an arch structure which is 166 feet in height, topped with statuary. The project sits within a plaza that consists of granite pavers and is surrounded by a seat wall with bollards aligning with the openings of the arch. The plan includes changes to Memorial Circle with new pedestrian refuge island areas, new pedestrian crosswalks, and traffic signals. In July 2026, the Commission approved the preliminary plans for the proposed project with recommendations. The Commission expressed support for the purpose of the arch, which is to celebrate America's Semiquincentennial. In addition, the Commission found the scale of the arch and its opening have a relational impact on direct and panoramic views from different elevations resulting in tradeoffs, which should be considered in balance with the project's overall purpose

and need. In its current form, the proposed arch will allow for framed views of the Lincoln Memorial and Arlington House from the lower elevations of Memorial Bridge and Memorial Avenue; fully obstruct reciprocal views of the Lincoln Memorial and Arlington from the higher elevations of Arlington House and the Lincoln Memorial terrace; and introduce a new panoramic view of the monumental core from the observation deck. Further, the Commission requested additional information regarding a series of items related to the function and operations of the facility, as well as other details of the project at the final review. The applicant has provided information in response to those requests, and therefore, the **Commission may approve the final site and building plans for the proposed Monumental Arch.** A summary of the submission responses and analysis follows in the report below.

Overview

History and Background of Site

According to the Cultural Landscape Report (CLR) published by the National Park Service in 2024, the Memorial Avenue Corridor was designed as a symbolic and physical link between the Lincoln Memorial, a tribute to the 16th American President; the entrance to Arlington National Cemetery; and Arlington House, the former plantation home of Confederate General Robert E. Lee. Architect William Mitchell Kendall, of the firm McKim, Mead & White, was responsible for the corridor's overall design. The corridor was built in phases: Arlington Memorial Bridge was constructed between 1926 and 1932; the Boundary Channel Bridge was built between 1929 and 1930; Memorial Circle was constructed on Columbia Island beginning in 1940; and Memorial Avenue was built beginning in 1930. Memorial Circle was designed as part of the western terminus of the Arlington Memorial Bridge as a means to connect to the George Washington Memorial Parkway, Arlington Boulevard, and Memorial Avenue.

According to the CLR, early designs for the area on Columbia Island that would become Memorial Circle included the bridge roadway meeting at an ellipse plaza where the cross arms would extend north and south from the ellipse. This elliptical plaza design also featured two columns, each 166 feet in height, each topped with a sculpture, intended to represent the post-Civil War reunion of the North and South, on either side of the Memorial Avenue roadway viewshed. The north and south arms of the ellipse plaza ended in small traffic circles, each with a circular Greek temple in the center. The designs for this area changed significantly before construction began on the single large traffic circle known today as Memorial Circle. The Circle has had other minor modifications over the years including reducing the travel lanes around the Circle to one, changing the paving materials, modifications to connecting roadways, and changes to pedestrian access and roadway efficiency as recently as 2020.

Project Purpose

According to the applicant, the purpose of the project is to celebrate 250 years of American independence by honoring America's founding principles through installation of a structure at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial

gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American heritage. Staff supports the celebration of the 250th anniversary of the nation's independence and therefore recommends the **Commission support the purpose of the project to celebrate America's Semiquincentennial.**

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

Project Description

The proposed project consists of an arch structure with two vertical supports at a height of 166 feet. The arch sits within a plaza that includes granite pavers encircled by a seat wall and two pedestrian access points lined with bollards. The two access points face east and west, aligned with the opening of the arch. The circle is shown with new pedestrian crosswalks connecting visitors via pedestrian refuge islands next to the traffic circle. Since the preliminary design the applicant has studied the transportation plan and eliminated 15 of the 32 traffic signal poles and has noted that traffic face and pedestrian signal head should be installed on the same fixture. The remainder of the project design is consistent with the plan the Commission approved at preliminary review.

The exterior of the proposed arch will be primarily clad in stone. The top area of the arch structure that includes the mezzanine, below the observation deck and statuary plinth, includes gold lettering quoting the American Pledge of Allegiance on both east and west facing sides. Above the primary arch structure and mezzanine is a recessed area housing the observation deck interior space and, above that, the proposed statuary. The proposed statues include a 60-foot-tall central gold, winged female figure flanked by a gold flying eagle on each side. All the statuary is facing east toward the Lincoln Memorial. There are also additional gold decorative elements on the underside of the arch and on each vertical face.

The proposed interior of the arch at the ground floor level includes ticketing and security, back of house space, stairwells, and elevators in the south vertical support, with an exit hall, back of house space, stairwells, and elevators in the north vertical support. The plans include a stair hall, restrooms, program spaces, and stair and elevator lobbies that connect up from the legs in the mezzanine. The stair hall includes two additional staircases and an elevator in the center to provide access to the observation deck above.

Arch Height

NCPC's role as the central planning agency for the federal government in the nation's capital has included application of the Height of Buildings Act of 1910 (HBA) to preserve the horizontal skyline of the District. During the preliminary review of the project in July 2026, the Commission requested that the applicant submit a justification for the project's height as part of the final review. The applicant has submitted a justification that states, in part "the 1925 Act [of Congress] authorizing implementation of the Memorial Bridge Commission's 1924 report explicitly authorized a structure on Columbia Island exceeding the height restriction of the HBA."

The Commission considered the justification provided by the applicant and convened an Executive Session for Commission deliberation. The consensus of the majority of Commissioners was that:

- As the 1925 Congress authorized a plan submitted by the Arlington Memorial Bridge Commission in 1924 that included elements above the limit prescribed by the HBA, Congress provided an implied waiver to the HBA which remains today;
- Congress gave the Arlington Bridge Commission the discretion to revise the design and, when the Arlington Bridge Commission was abolished in 1933 its authorities were transferred to the Department of the Interior by the President;
- Thus, the discretion to revise the design of elements in the 1924 Arlington Memorial Bridge Commission report is now exercised by the Department of the Interior, and the Commission accepts the project submission as an exercise of that discretion; and therefore,
- The **Commission finds that, based on the submitted materials and deliberations by the Commission, because Congress implicitly waived the Height of Buildings Act in its 1925 action, the revised design is not required to comply with the Height of Buildings Act;** and further
- **The Commission approves the height of the project as submitted by the applicant.**

Pedestrian Accessibility

The arch is intended to be a visitor destination and includes an observation deck. Memorial Circle is an integral part of the vehicular access between the Arlington Memorial Bridge and the George Washington Memorial Parkway, Washington Boulevard, and Memorial Avenue with significant traffic volume, especially on the eastern side of the circle. As such, it will be important to ensure the continued safe operation of the traffic network, as well as the safe passage of visitors. At preliminary review, the Commission requested a transportation or traffic study that evaluated the proposed pedestrian access to ensure that visitors can avoid pedestrian and vehicular conflicts. The applicant submitted an updated traffic study that evaluated pedestrian safety and level of service and determined the proposed traffic configuration is safest for pedestrians. Additionally, the study determined the design should provide sufficient space for pedestrians to cross safely with some delay during peak visitation periods. The study acknowledges that further refinements are expected to the traffic signal phasing and timing as the project is implemented.

Vehicular Accessibility

At the preliminary review, the Commission also requested updated information regarding the potential off-site impacts to the vehicular transportation network in response to comments from

the District Department of Transportation and Arlington County, Virginia. The updated traffic study included additional analysis to the larger road network and level of service with updated routes to replace the eliminated northbound and westbound movements through Memorial Circle. The updated study found that the only recurring congestion in the study area after the implementation of the project occurs during the weekday morning commuter peak period along Washington Boulevard at the merge with the George Washington Memorial parkway ramp, south of Memorial Circle. The study found based on research at similar sites indicates that the project will likely attract the highest volumes of visitors during the early afternoon, weekends, and holidays, when vehicular traffic demand through the area is lower. The updated analysis further concluded that the majority of both existing and future delays are driven by the weave merge south of Memorial Circle and not by the planned traffic signals or pedestrian circulation improvements. The existing weave merge leads to an average queue length of 2,700 feet and is anticipated to increase to 3,000 feet after the implementation of the project. This increase will not extend to the I-395 interchange which is approximately 7,000 feet to the south of the project site.

Staff acknowledges the proposed plan will alter traffic movement, and as described in the submission materials, may increase vehicular delays to help improve pedestrian access. As such, staff recommends the **Commission find that while the project may alter overall traffic movement around the circle and increase delays on Washington Boulevard from the south, the design will improve pedestrian and bicycle safety and circulation** and **supports the reduction of the number of signal poles which helps remove visual clutter and maintain pedestrian and vehicular safety.** NCPC received additional comments from both the District Department of Transportation and Arlington County, Virginia regarding the transportation study materials. In reply, the applicant submitted responses to offer clarity and emphasize their commitment to continued coordination on the transportation design as the project is implemented.

After the project is completed, the applicant has stated that further refinement of traffic signal timing will occur as visitation to the arch is better understood. Regarding this and other issues, staff suggests the **Commission request the applicant continue to work with the Federal Highway Administration, District Department of Transportation, Arlington County, and other agencies as appropriate, regarding the proposed changes and impacts to the surface transportation network through construction and project implementation.**

Loading/Unloading

At preliminary review, the Commission requested information regarding parking and loading/unloading for visitors to the arch to ensure safe access for those of all abilities and minimize disruption to the traffic network. The application has coordinated with Arlington National Cemetery (ANC), the National Park Service (NPS) and the U.S. Park Police (USPP) on a curb use management plan to address the various visitors to the site. The proposed plan includes the use of the ANC parking facilities for private vehicles and motorcoach parking will also be accommodated by ANC. The plan states that Memorial Avenue, with 60 feet of right of way and four lanes, will be used for pick-up and drop-off for visitors to the site. The plan also designates areas for NPS and USPP staff parking. Therefore, staff suggests the **Commission encourage the applicant to continue coordination with Arlington National Cemetery regarding the use of Memorial Avenue and the cemetery**

parking garage for arch visitor parking as the project is implemented.

Aviation Safety

The proposed project is shown at a height of 250 feet and the location along the Potomac River is approximately 3,000 feet from Ronald Reagan Washington National Airport, near landing approaches for two runways (01/19 and 15/33). At the previous review, the Commission requested the applicant incorporate any navigational safety lighting as required by the Federal Aviation Administration (FAA) and continue consultation with the FAA to evaluate potential impacts of the proposed project on air navigation. The FAA has provided the applicant with a *Determination of no hazard to air navigation* finding for the proposed arch with a condition for safety lighting that includes a non-standard eternal flame and continuous floodlighting by searchlight projectors installed at three or more equidistant points to provide illumination to the top one-third of the structure. These elements are included in the final submission.

Project Design and Materials

The Commission previously requested the applicant provide, as part of this submission, the final granite cladding selection and the application states that several stone cladding options remain under consideration. These include Sierra White granite; Bethel White granite; Barre Granite; and Carrara Marble. A final selection will be made during the procurement process.

In addition the Commission requested the applicant submit a narrative describing the proposed lighting concept and its relationship to the Lincoln Memorial and Arlington National Cemetery that includes relevant details on the proposed lighting stanchions and any other site lighting, including illumination levels proposed (foot lambers, or other measure) to understand the relative brightness of the monument as compared to other national monuments and memorials, and to protect the lighting hierarchy of the National Mall. The applicant submitted a lighting study of other similar monuments and memorials on or near the National Mall and their corresponding nighttime lighting levels. The study demonstrates similar lighting levels to that proposed at the project. The applicant also submitted the final lighting plan that includes architectural accent lighting at the building crown and underside of the arch, and to up-light the statuary, six ground-mounted light stanchions around the circle to ensure the arch is illuminated and to meet FAA requirements. The proposed lighting levels have been designed to maintain approximately 15 footcandles at elevations of 150 feet and higher to eliminate the need for FAA aircraft warning lights, as conditioned in the FAA *Determination of no hazard to air navigation* finding. Adjustments of lighting levels and details often occur after implementation. As such, staff recommends the **Commission encourage the applicant to monitor and refine the proposed lighting plan after implementation to ensure a balance between required lighting and the project setting.**

Staff notes the applicant also considered comments regarding construction impacts to ANC. As part of the submission, including the EA, the applicant evaluated potential noise levels at the project site during and after construction to understand any impacts to the area and possible

mitigation strategies. The noise level study modeled how pile driving for the project foundations, which is the loudest anticipated activity, could affect sound conditions in the area. The modeling found that adding noise blankets or noise curtains as mitigation could reduce the sound impact of the pile driving to at, or below, the maximum sound level recommended around cemeteries. The model results also noted that the area is already a high ambient noise area and much of the anticipated construction noise would be indistinguishable from the existing ambient noise or from the noise generated by other construction projects planned or ongoing in the area. Ongoing coordination should occur between the applicant and ANC as construction commences. Therefore, staff recommends the **Commission encourage the applicant to continuously monitor the noise level of construction activities to minimize impacts to Arlington National Cemetery.**

Finally, staff notes the applicant is proposing to utilize bioretention with native grasses and shrubs around the perimeter of the circle to accommodate stormwater runoff. Additional coordination with the District Department of Energy and Environment will be necessary to meet applicable permitting requirements.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

Staff reviewed the project considering the policies set forth in the *Comprehensive Plan for the National Capital,* particularly those found in the Urban Design, Historic Preservation, Parks and Open Space, and Visitors and Commemoration Elements as described in this report. Several Comprehensive Plan policies acknowledge the need to balance new uses and contemporary needs within existing landscapes and the built legacy of Washington, DC (POS.A.8 and POS.A.12). This should be done in balance with protecting key design elements like viewsheds as described at preliminary review (HP.D.3). The policies recognize that the Nation's Capital will continue to change and develop over time.

As a reminder, the Commission takes a holistic approach when applying the Comprehensive Plan policies in the context of the project's needs and objectives when making a determination regarding consistency. On the whole, the project is generally consistent with the Federal Elements of the *Comprehensive Plan for the National Capital*.

National Historic Preservation Act

Both NPS and NCPC have a responsibility to comply with the National Historic Preservation Act. NPS initiated the Section 106 process of the National Historic Preservation Act on June 6, 2026. NCPC notified NPS in writing on June 10, 2026, that, in accordance with the relevant regulations, NCPC was designating NPS as the lead federal agency for purpose of compliance with the Section 106 process of the National Historic Preservation Act. Subsequently, NCPC participated in the Section 106 process as a consulting party. At preliminary review, the Commission requested the applicant continue to consult as necessary with the federal agencies and the Section 106 consulting

parties, to continue to explore ways to minimize impacts to historic resources, and to determine appropriate mitigation to resolve adverse effects.

NPS prepared a draft Assessment of Effects and Memorandum of Agreement and held a consulting parties meetings on June 16, 2026 and September 9, 2026. On September 24, 2026, the Advisory Council on Historic Preservation (ACHP) notified NPS and all consulting parties, including NCPC, that it had terminated consultation on the project pursuant to 36 CFR § 800.7(a)(4). ACHP held a meeting on September 29, 2026 to allow consulting parties to provide any views on this undertaking and proposed resolution of adverse effects. On October 7, 2026, the ACHP provided its final comments to the Secretary of Interior, and the Secretary of Interior responded on October 9, 2026, which officially concluded the Section 106 process according to the relevant regulations.

Thus, NCPC participated in the Section 106 process per its obligations regarding the project. Termination concludes the Section 106 process, and, as NCPC had designed NPS lead agency, the termination also concluded NCPC's responsibilities under the National Historic Preservation Act.

National Environmental Policy Act

Both NPS and NCPC have a responsibility to comply with the National Environmental Policy Act (NEPA). NPS is lead agency and prepared an Environmental Assessment, dated October 2026, and issued a Finding of No Significant Impact for the project on October 9, 2026. As noted in the EA, the construction of the arch will celebrate 250 years of American independence by honoring America's founding principles through installation of a structure at the intersection of Arlington Memorial Bridge and Memorial Avenue within George Washington Memorial Parkway, in a manner consistent with the avenue's established role as a ceremonial gateway and "Avenue of Heroes" celebrating valor, sacrifice, and American Heritage. However, the EA states the impacts are not likely to be significant. Further, the proposed project will meet the stated purpose and need. Per NEPA and NCPC's NEPA regulations, NCPC may utilize environmental documentation prepared by another agency for a project submitted to NCPC. As such, the **Commission may adopt the Environmental Assessment prepared by the National Park Service, dated October 2026 for use by the Commission**. A Finding of No Significant Impact (FONSI) was prepared based upon the EA and the submission materials. The FONSI will be signed following the Commission's action on the application.

Commemorative Works Act

The applicant, the Department of the Interior, has indicated that the project is not subject to the Commemorative Works Act (CWA) and NCPC relies on the applicant to determine whether the CWA applies. In this case, NCPC is reviewing the project pursuant to the National Capital Planning Act.

CONSULTATION

Coordinating Committee

The Committee forwarded the proposed final site and building plans to the Commission with the statement that the proposal has been coordinated with some, but not all participating agencies. Commission of Fine Arts staff inquired about the lighting levels and noted their Commission has approved the project. The Department of Energy and Environment (DOEE) noted coordination was ongoing, and they are waiting for a storm water management plan to be submitted into the surface and groundwater system (SGS). The project reviewer will have further comments down the line.

The District of Columbia State Historic Preservation Office (DC SHPO) commented "they were not coordinating on this project and continue to strongly object to the proposed arch along with every consulting party that participated in the abbreviated Section 106 review process and the majority of the public who submitted comments." Participating agencies included NCPC, the U.S. General Services Administration, NPS, CFA, the DC SHPO, the District of Columbia Office of Planning, the District Departments of Transportation and Energy & the Environment, and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts, at their April 16, 2026 meeting, approved the concept plans for the monumental arch with comments for the applicant to consider. At their May 21, 2026 meeting, the Commission approved the final design.

PUBLIC COMMENT

NCPC has received a substantial number of public comments on the project. As of the date of this report, approximately 1,300 comments have been submitted. The vast majority of the comments received are in opposition to the project, specifically the height, scale, location, traffic impacts, and lack of sufficient public review process for the project. Others raised concerns about the celebratory intent in a solemn location. Some comments raised objections to components of the project outside of NCPC's purview such as the cost and compliance with the Commemorative Works Act. NCPC also received some comments in support, which have generally mentioned the need to celebrate the 250th anniversary of American independence. NCPC staff considered these concerns in the evaluation of the project as detailed in the analysis above.

ONLINE REFERENCE

The following supporting documents for this project are available online at www.ncpc.gov:

- Submission Package
- Project Synopsis

ATTACHMENTS

1. Agency Comments and Responses
2. U.S. Commission of Fine Arts letters

National Capital Planning Commission

New Monumental Arch

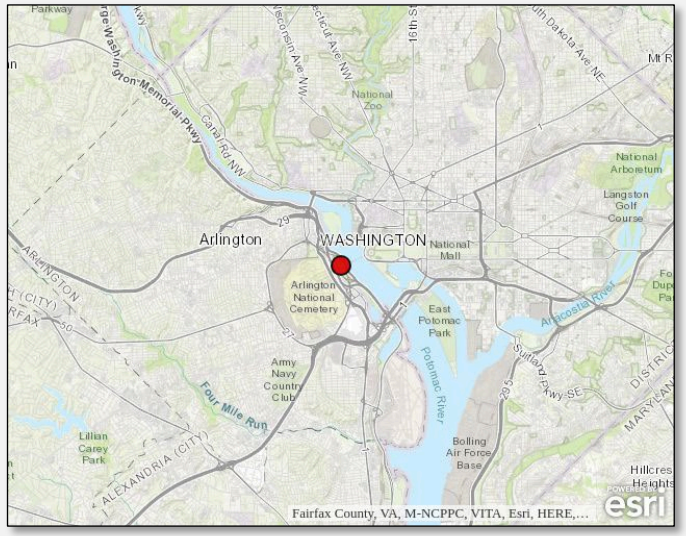
Memorial Avenue, Washington, DC

Approval of Final Site and Building Plans

United States Department of the Interior

November 5, 2026 | File: 8778

Site Location





Location Map

Project Location



Description of Project Area

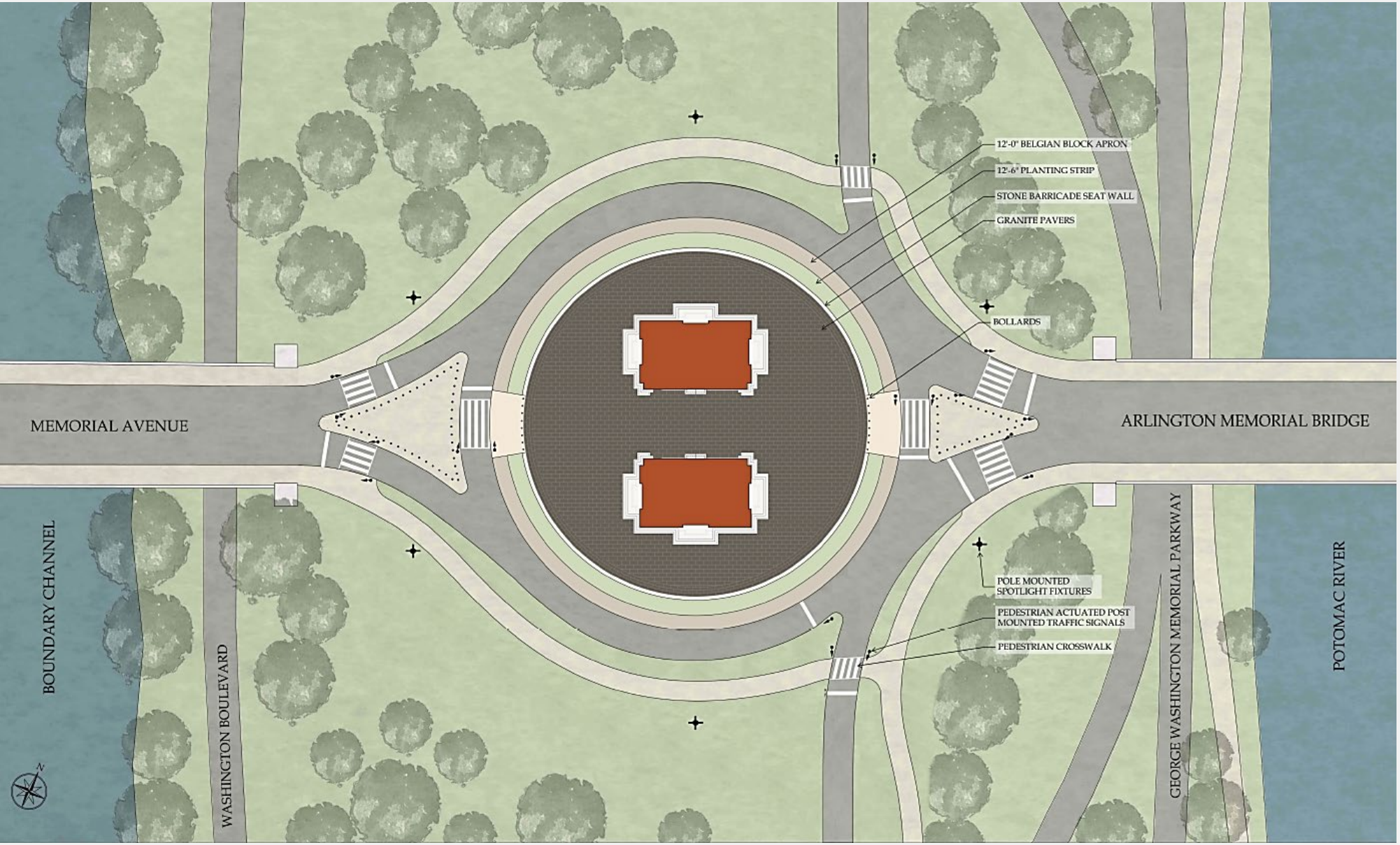


The project site is Memorial Circle, which is at the intersection of Memorial Bridge, Memorial Avenue and Washington Boulevard in Washington, DC.

The proposed construction and materials staging area is south of the project site.

Arlington National Cemetery is west of the project site and the Lincoln Memorial is east of the project site, across the Potomac River.

Final Site Plan



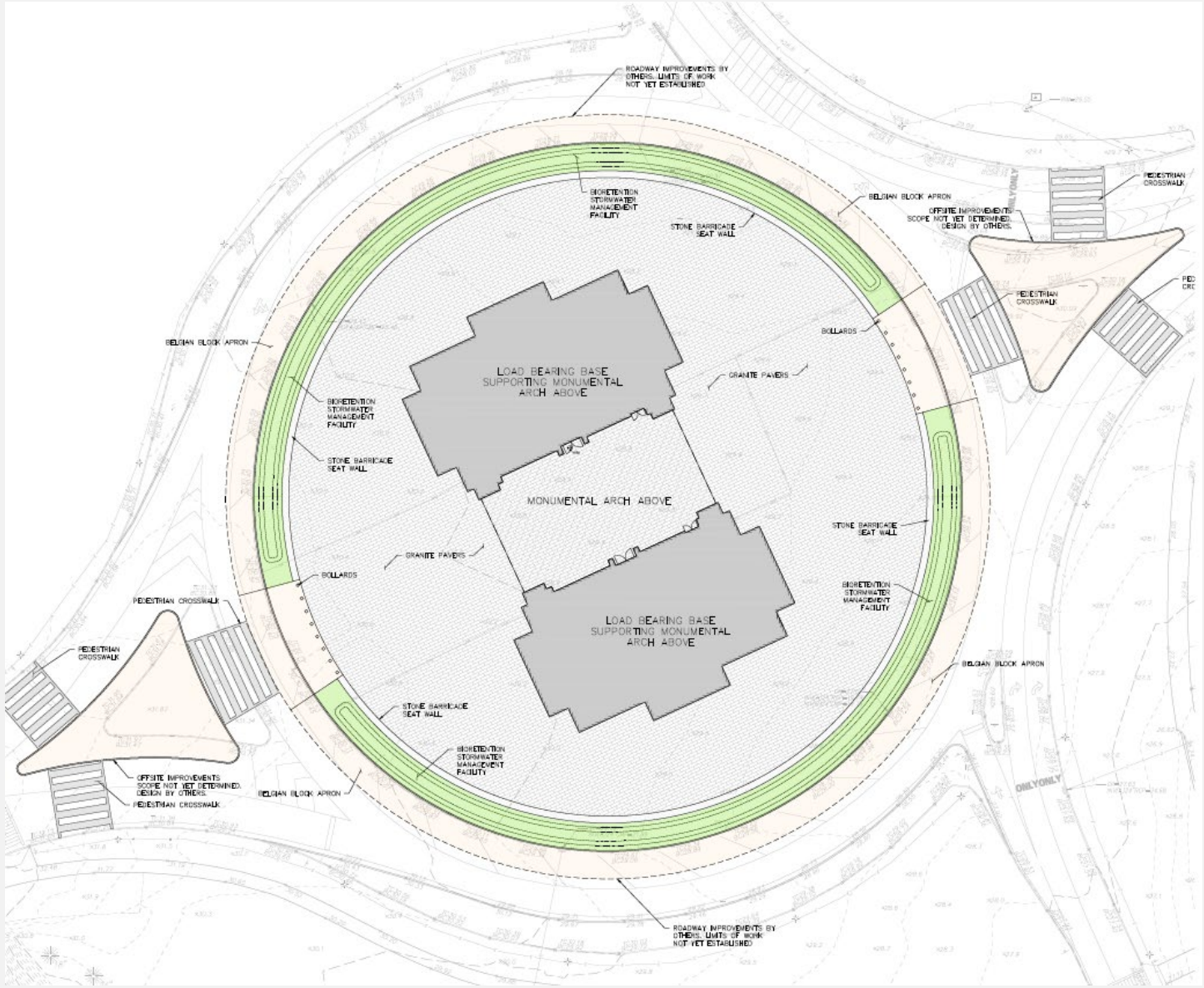
Proposed Elements:

- Belgian Block Apron
- Planting Strip
- Stone Seat Wall
- Granite pavers
- Recessed Up-Lights
- Bollards
- Pole Mounted Spotlights
- Pedestrian Crosswalk
- Traffic Signals

Updates:

- 15 Traffic Signals removed, 2 minimum maintained at each pedestrian crossing

Final Design



LEGEND:

LOAD BEARING BASE SUPPORTING MONUMENTAL ARCH ABOVE	
ARCH OVERHEAD	
GRANITE PAVERS	
LANDSCAPE	

Final Architectural and Design Program



Design

Final Monumental Arch Rendering



Final Monumental Arch Rendering



Updated Traffic Access Analysis



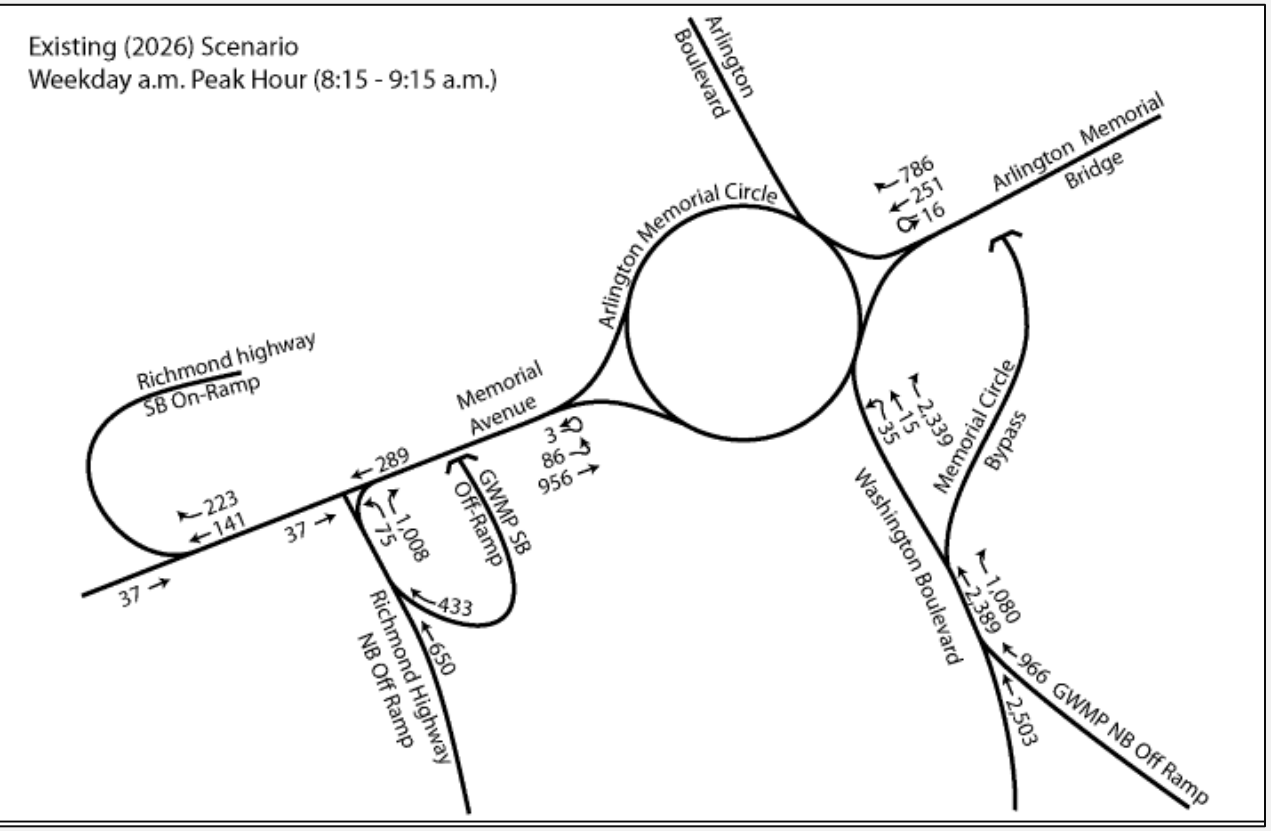
The study area was expanded to the south and west to evaluate potential impacts to the broader transportation network resulting from concerns that projected vehicle queues extended beyond the original study limits. Previous iterations of the traffic analysis only included AMC. This analysis was expanded to 4 additional approaches in the larger transportation network. The study includes the following areas and intersections:

1. AMC, including all surrounding approaches
2. Washington Boulevard at GWMP Ramps
3. Memorial Avenue at Richmond Highway/GWMP Off-Ramp
4. Memorial Avenue at Richmond Highway SB On-Ramp
5. Richmond Highway NB Off-Ramp at GWMP SB Off-Ramp

Existing Traffic Counts

Weekday Morning Peak Hour Traffic Counts

Existing 2026



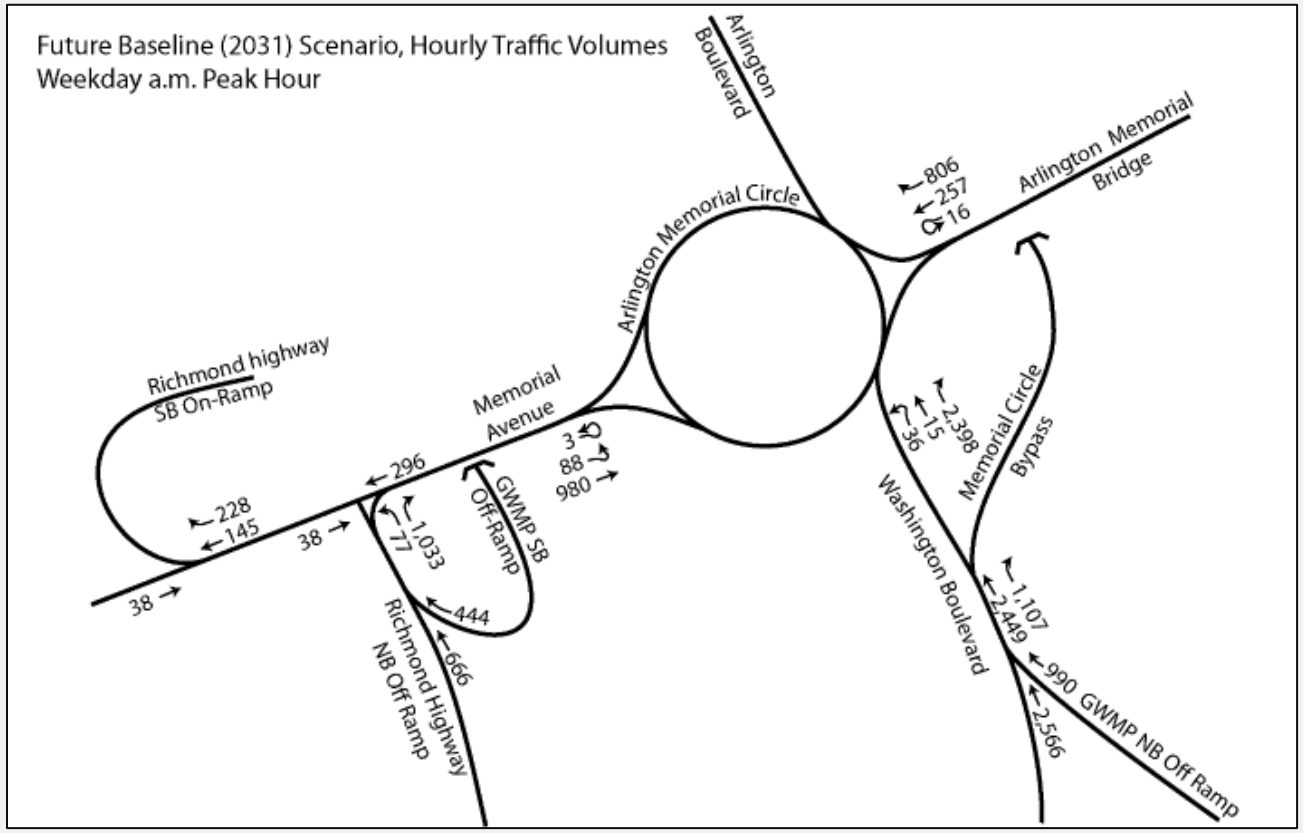
Throughout AMC, the highest traffic volumes occur at the Washington Boulevard northbound right turn movement and the Memorial Avenue eastbound through movement. Traffic from Washington Boulevard and from Memorial Avenue combine into traffic traveling over the AMB towards Washington D.C.

The highest volume occurs during the morning commuting period with a shorter and a higher peak exceeding 3,000 vehicles per hour.

Future Baseline Traffic Counts

Weekday Morning Peak Hour Traffic Counts

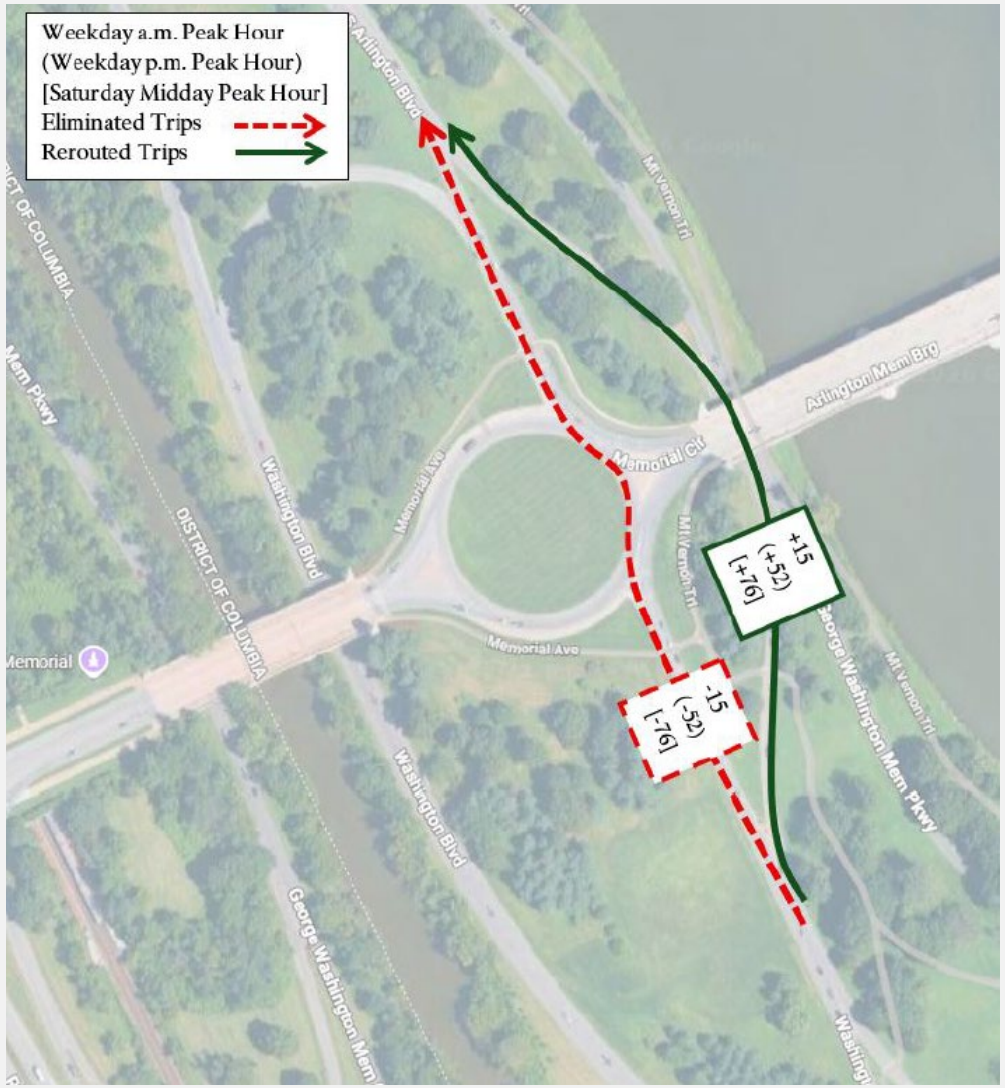
No Change 2031



Consistent with standard traffic study methodology, existing traffic volumes were projected to future-year conditions to evaluate and compare anticipated traffic operations without the proposed project (Future Baseline) and with the proposed improvements in place (Future Build). By comparing these two scenarios the traffic model can present a better measure of the impact of the project after it is fully operational. The future year for this project was established as five years, consistent with a typical short-term future traffic forecasting period.

Future traffic volumes were projected using a growth rate of 0.5% per year over five years. This growth rate is consistent with the forecasting of other regional transportation models and is supported by travel demand projections developed by the Metropolitan Washington Council of Governments (MWCOG).

Proposed Traffic Circulation Changes



Project eliminates:

1. Washington Boulevard northbound through movements
2. Washington Boulevard northbound to westbound Memorial Avenue

Traffic will be rerouted

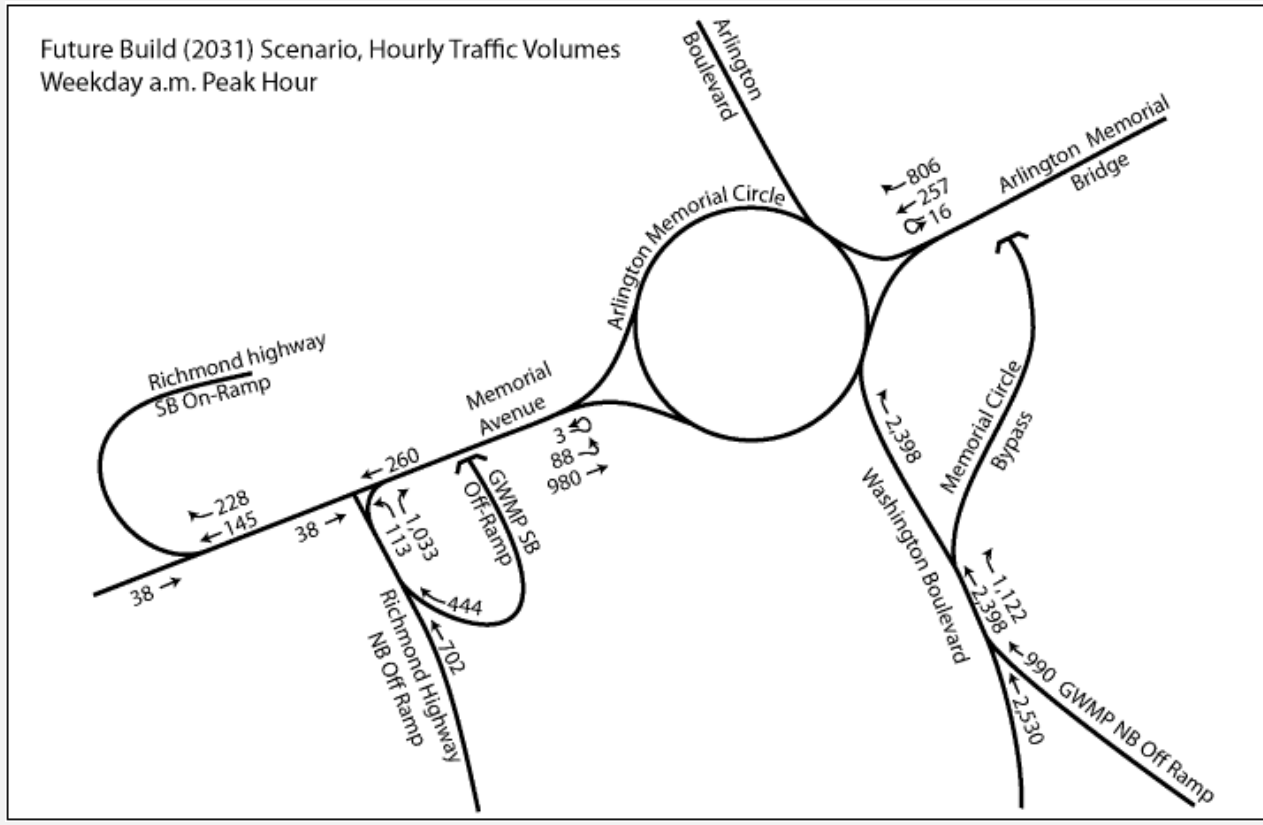


Future Traffic Counts

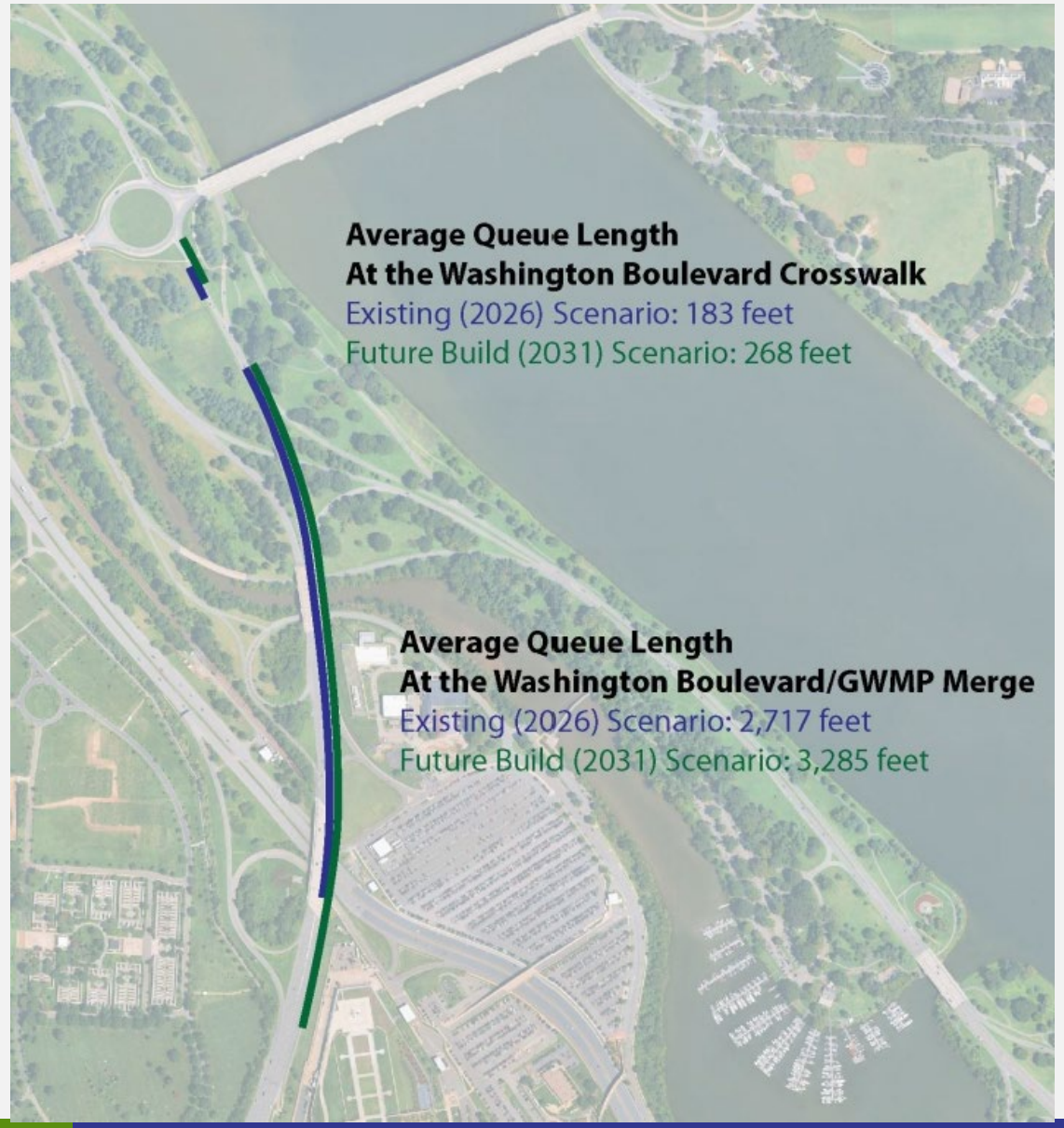
Weekday Morning Peak Hour Traffic Counts

The proposed signalized concept eliminates one approach lane serving two movements through AMC, the Washington Boulevard northbound through movement to Arlington Boulevard and the Washington Boulevard northbound left-turn movement to Memorial Avenue. The traffic volumes can detour to alternative routes as shown. The figure also shows the traffic volume expected to detour during the weekday a.m. peak hours and have been incorporated in the traffic volumes and traffic modeling analysis.

Future with Proposed Arch 2031

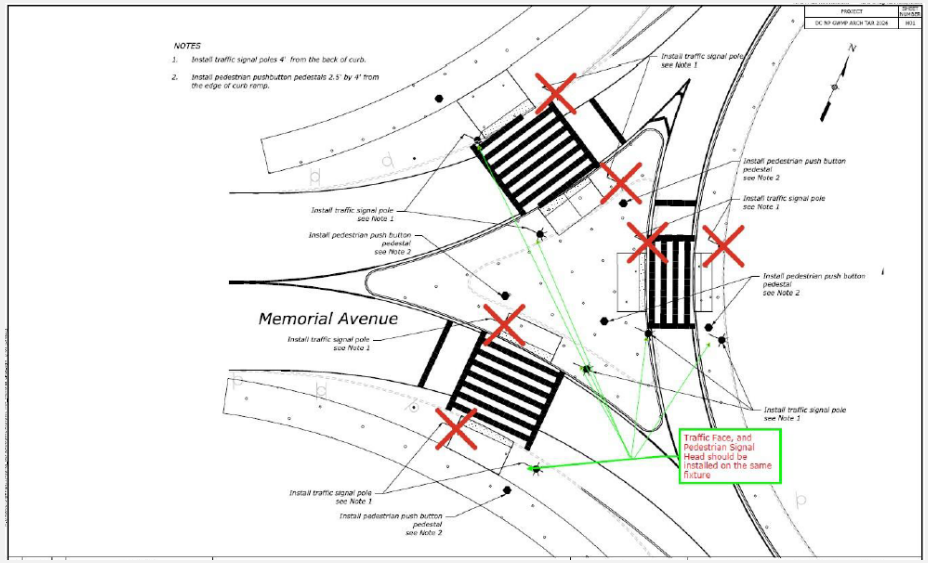


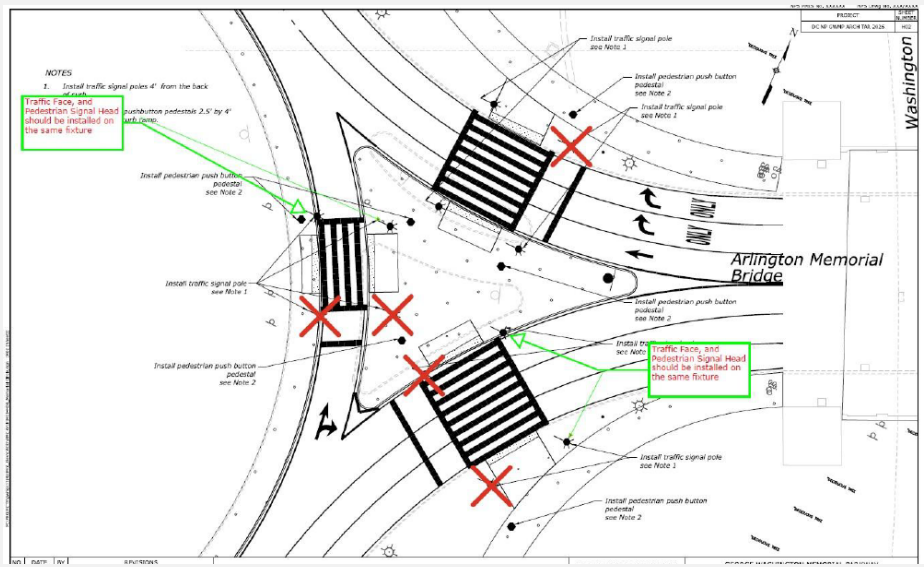
Future Queue Length - Washington Boulevard

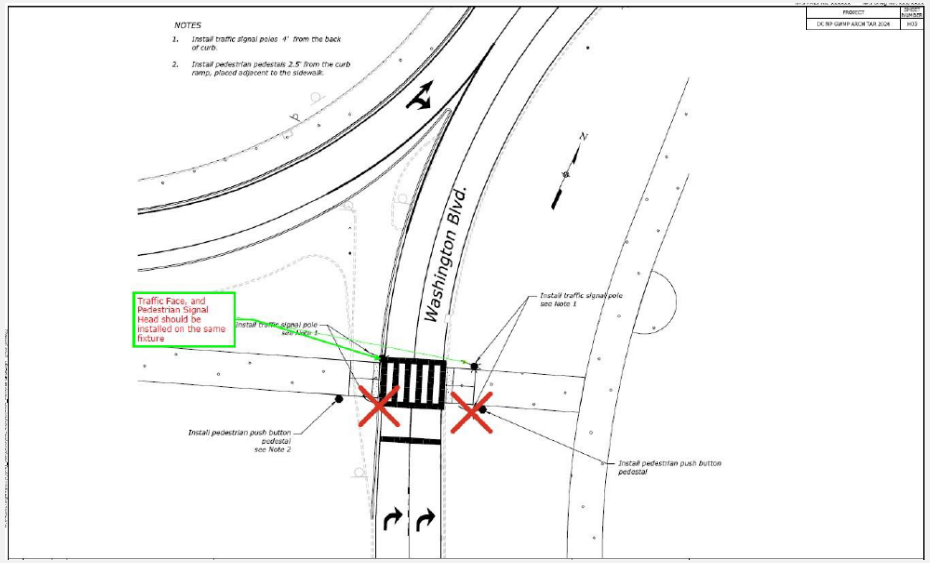


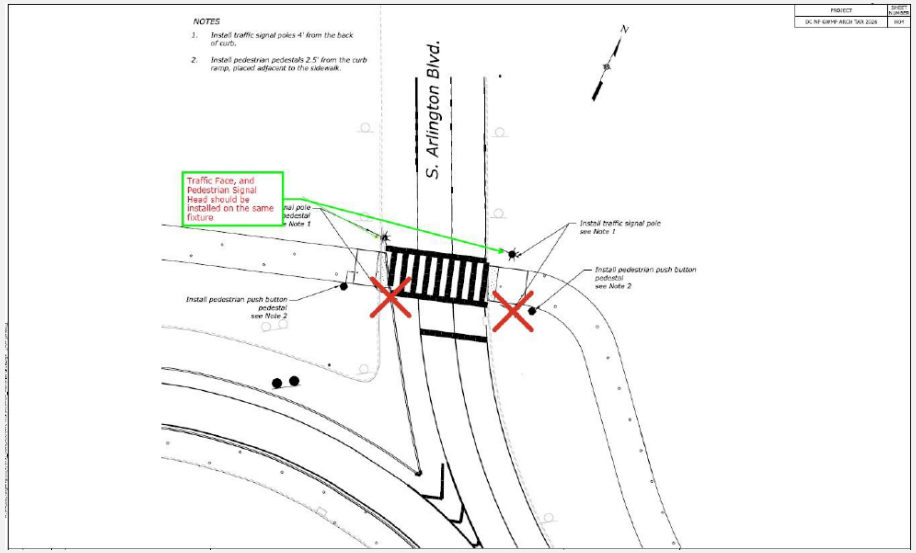
The traffic operations analysis demonstrates that during the weekday morning commuter peak period congestion originates along Washington Boulevard at the merge point with the GWMP ramp, south of AMC. The weave condition leads to an average queue length of about 2,700 feet today and is expected to maintain a length of about 3,000 feet in the future. This average queue length does not extend to the interchange with I-395, which is approximately 7,000 feet south of AMC.

Traffic Signal Updates



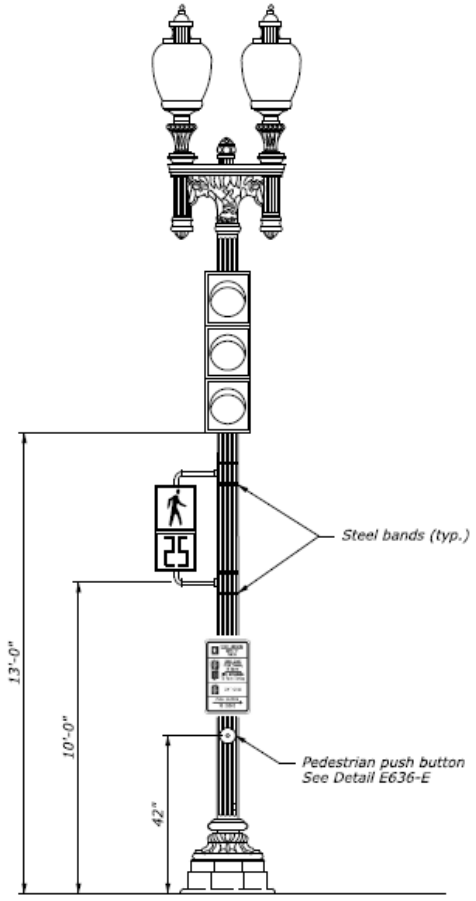




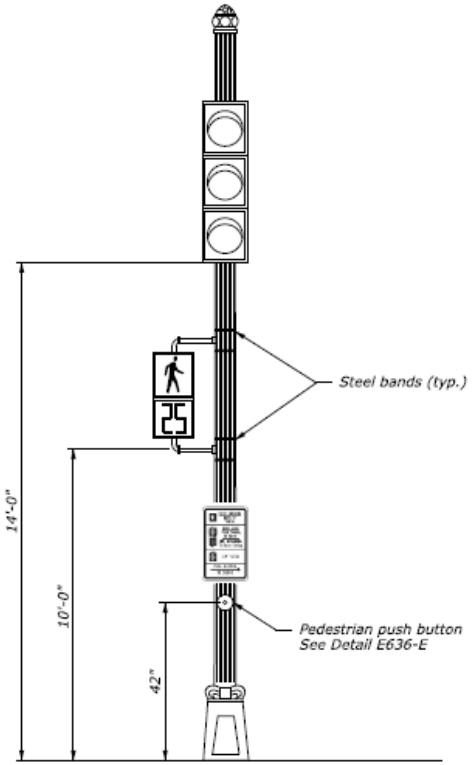


To reduce visual clutter within the landscape and provide a more representative estimate of the infrastructure required, an analysis was conducted to evaluate potential sight-distance and visibility constraints for each signal face. Based on this analysis, 15 traffic signal posts were eliminated from the preliminary design. Each signalized crosswalk will retain a minimum of two traffic signal posts and the necessary three-section vehicular signal indications, pedestrian signal indications, and accessible pedestrian push buttons.

Final Transportation Details



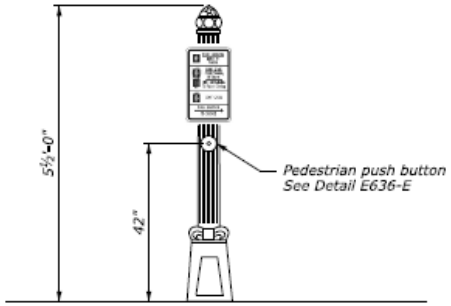
TWIN 20 STYLE LIGHTING STANDARD WITH LED RETROFIT UPGRADE



20 FOOT TALL STEEL TRAFFIC SIGNAL POLE

NOTES:

1. Mount all new steel traffic signal poles on a transformer. See Detail E636-D for transformer base details.
2. Use stainless steel strapping to affix hardware to poles, unless otherwise specified.

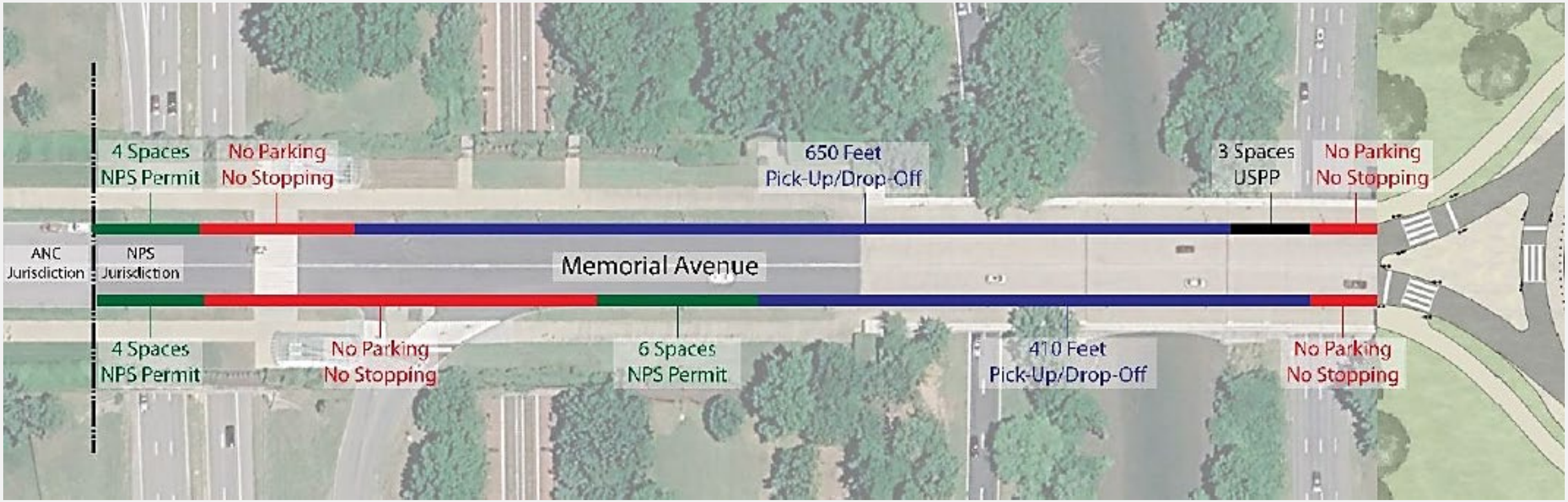


STEEL PEDESTAL POLE

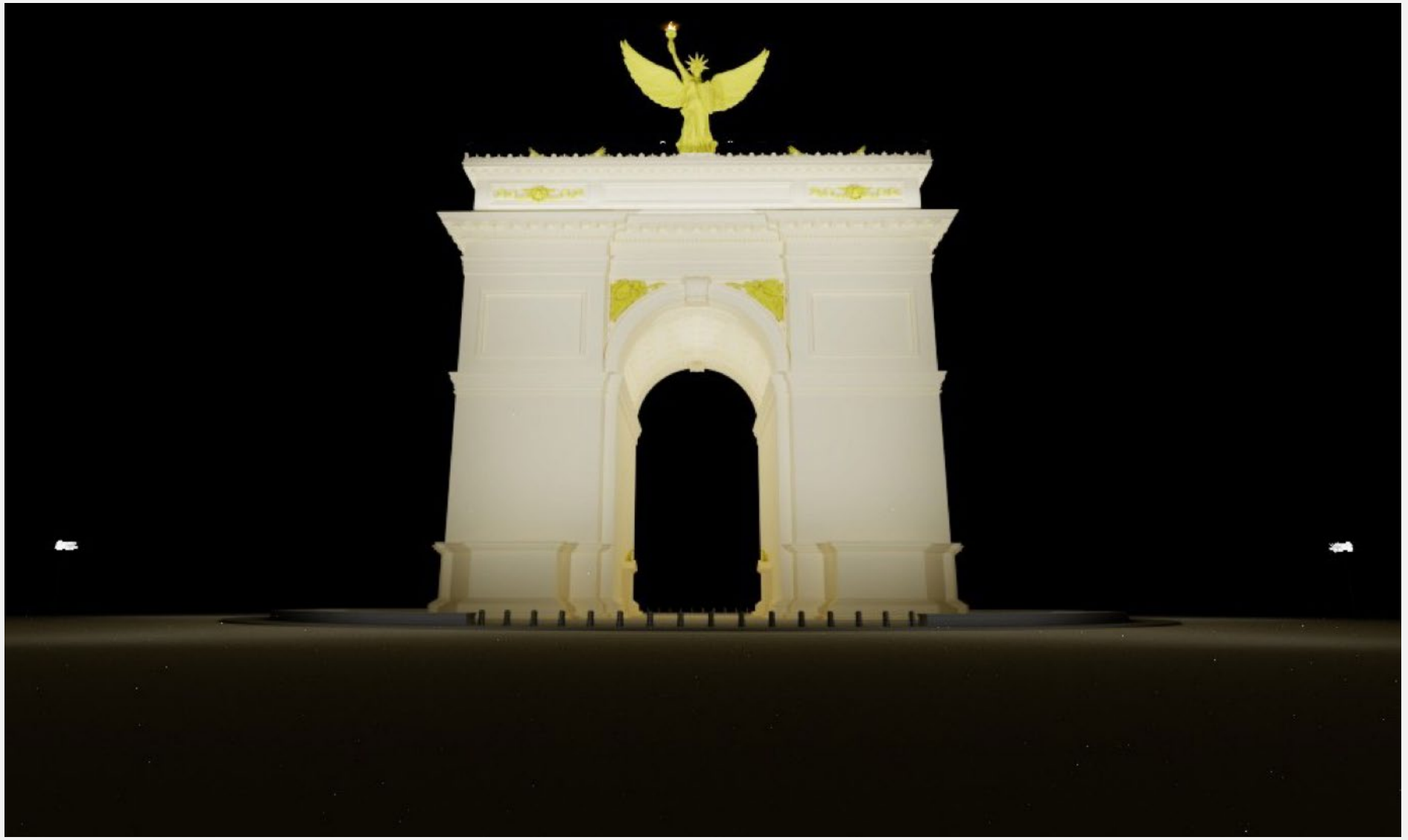
Traffic Signal Hardware Arrangement on Metal Poles

Final Curb Use Management Plan

Per the submission, memorial Avenue is approximately 60 feet wide, providing sufficient roadway width to accommodate curbside activities while maintaining two-way vehicular operations. Dedicated curbside space will support passenger pick-up and drop-off, staff parking, bus loading and unloading, and other delivery and service activities. Existing parking at ANC provides capacity for personal vehicles, while motorcoach parking and staging will continue to be accommodated primarily at ANC, with Memorial Avenue available to support overflow operations as needed. Coordination with ANC regarding parking, curbside operations, and site access will continue as the project advances.

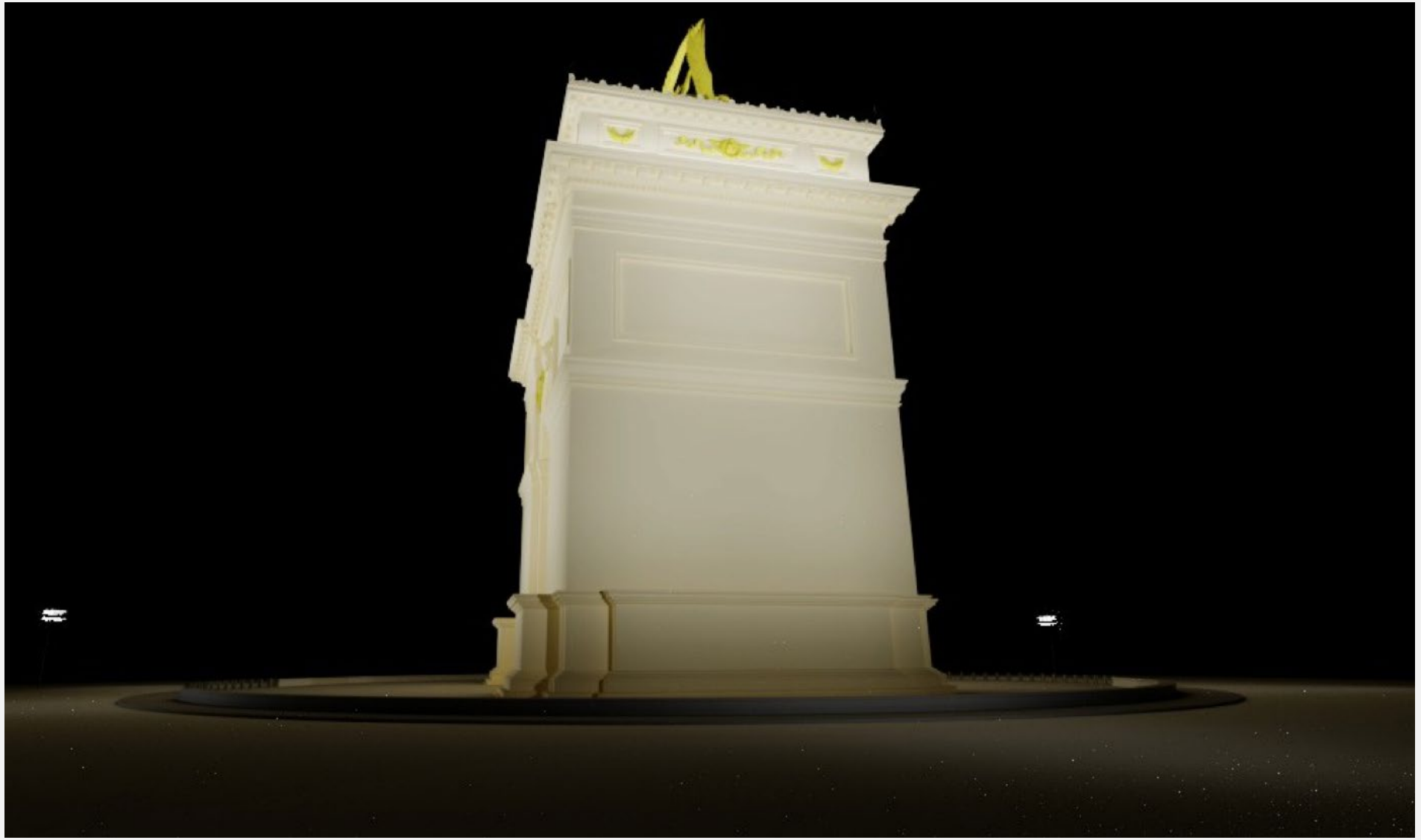


Final Lighting Rendering



According to the applicant, the proposed lighting design for the arch is intended to create a timeless nighttime presence that highlights the monument's architectural significance while maintaining visual comfort for motorists, visitors, and the surrounding environment. The design focuses on emphasizing the arch's defining architectural features, enhancing depth and dimension, and delivering a balanced, uniform visual appearance from all viewing angles.

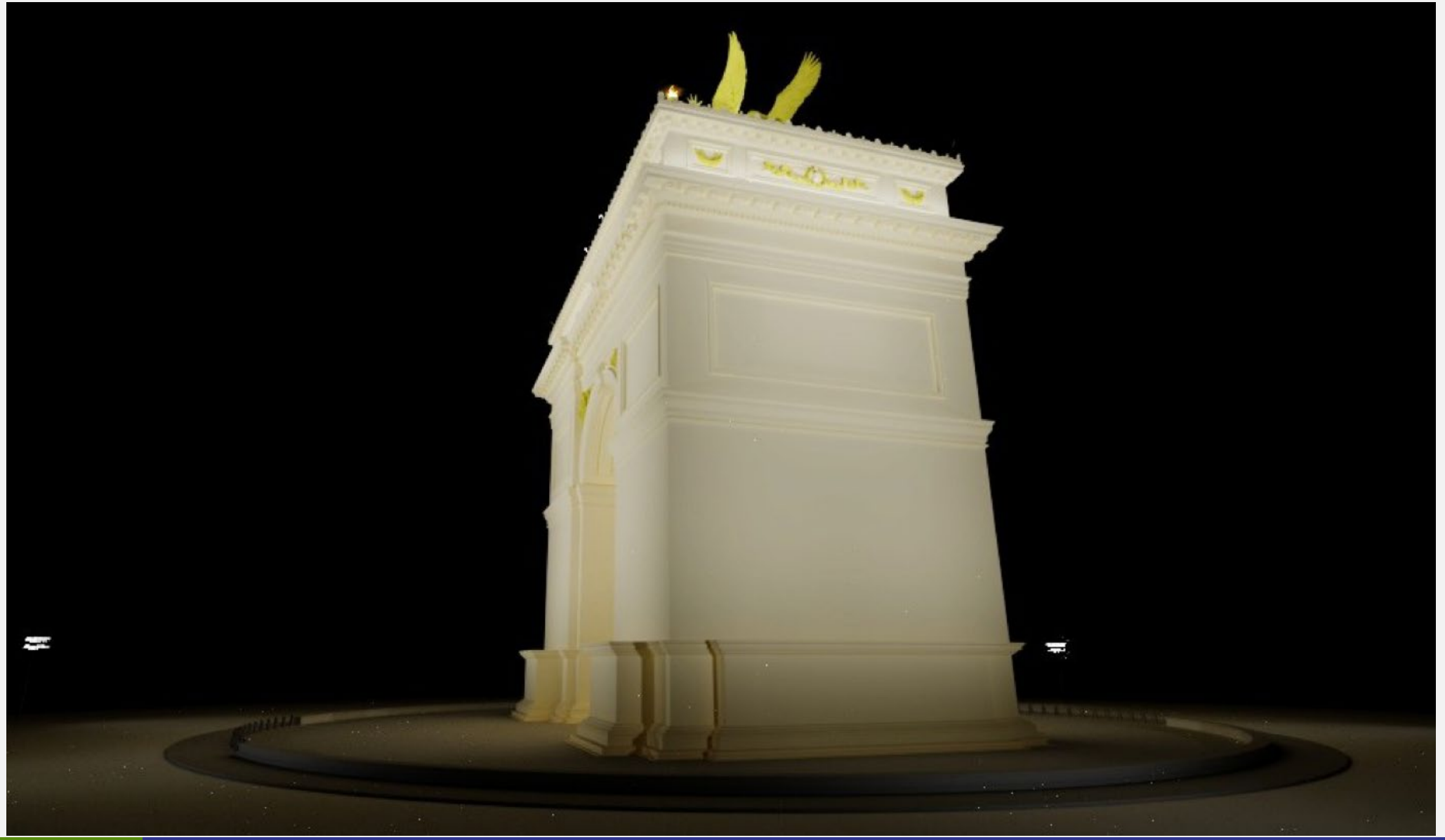
Final Lighting Rendering



Final Lighting Rendering



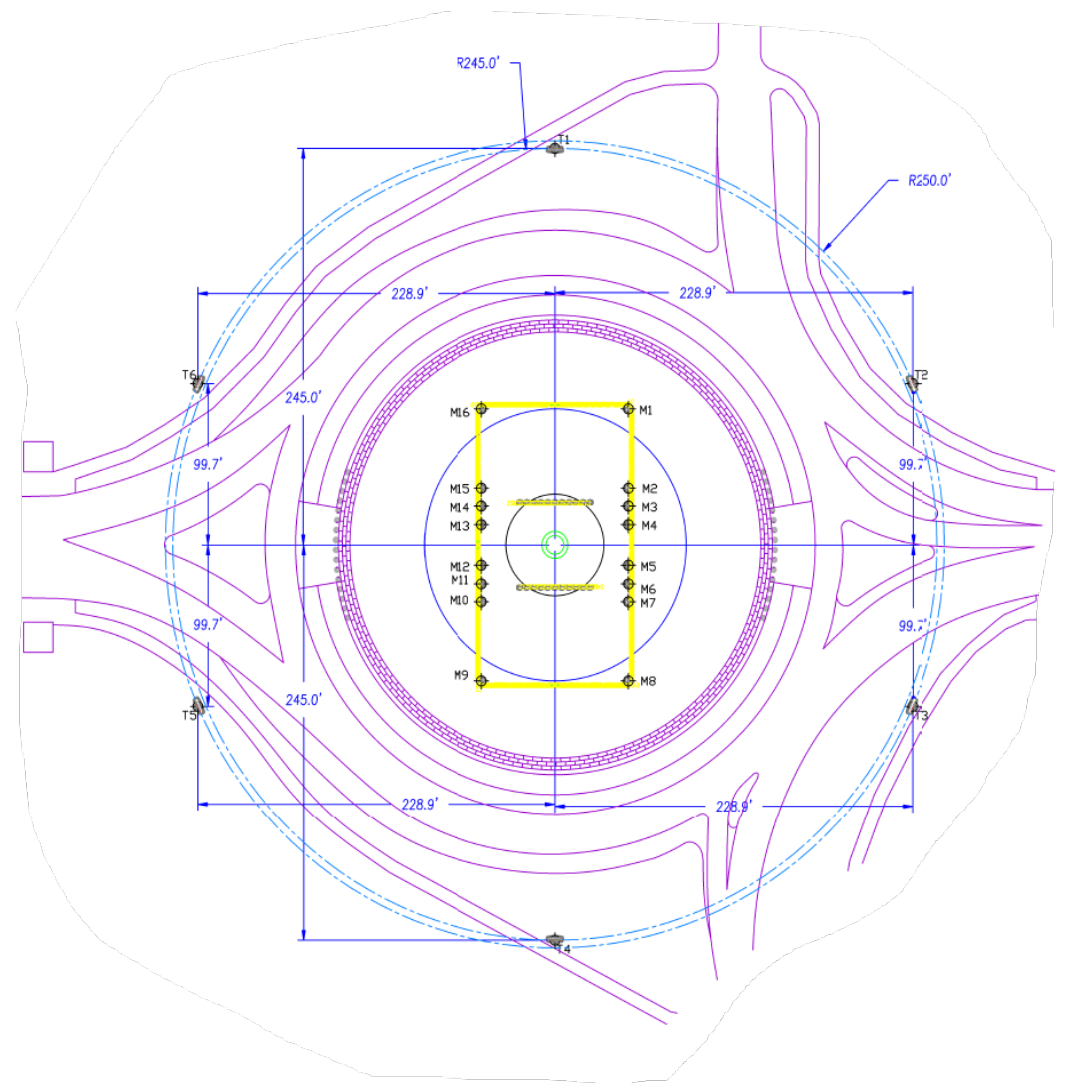
Final Lighting Rendering

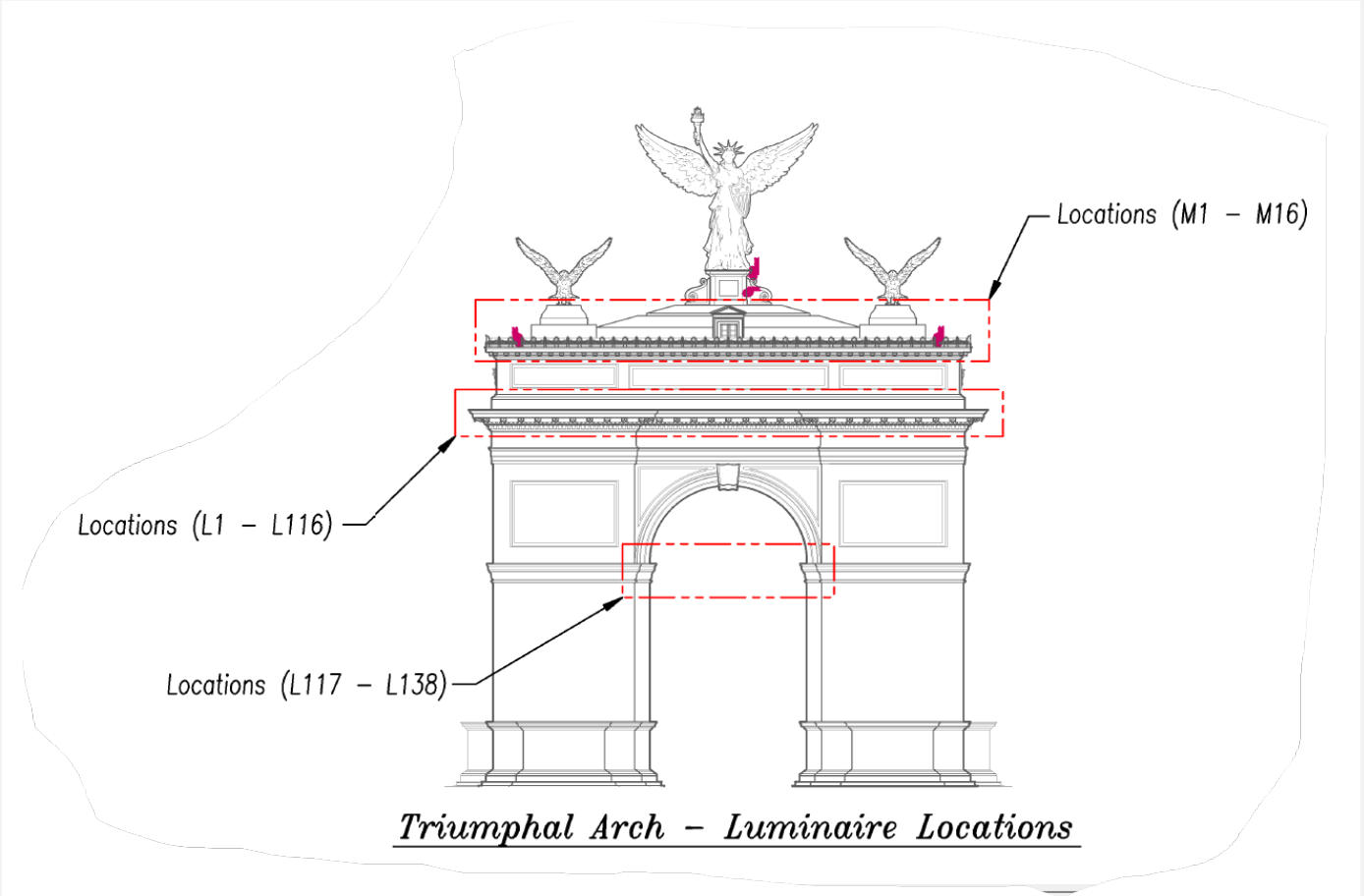


Final Lighting Rendering



Final Lighting Plan





Final FAA Lighting Plan

On September 18, 2026 the FAA provided NPS with a “DETERMINATION OF NO HAZARD TO AIR NAVIGATION” finding for the Triumphal Arch. Section 7, provides the following condition for safety lighting; “*The proposed structure should be appropriately marked/lighted with a non-standard eternal flame and continuously floodlighted by searchlight projectors installed at three or more equidistant points around the base of the structure. The searchlight projectors should provide an average illumination of at least 15 foot-candles (161.46 lux) over the top one-third of the structure, in accordance with FAA AC 70/7460-1N, Paragraph 4.5, to make it more conspicuous to airmen.*”

Conceptual Eternal Flame

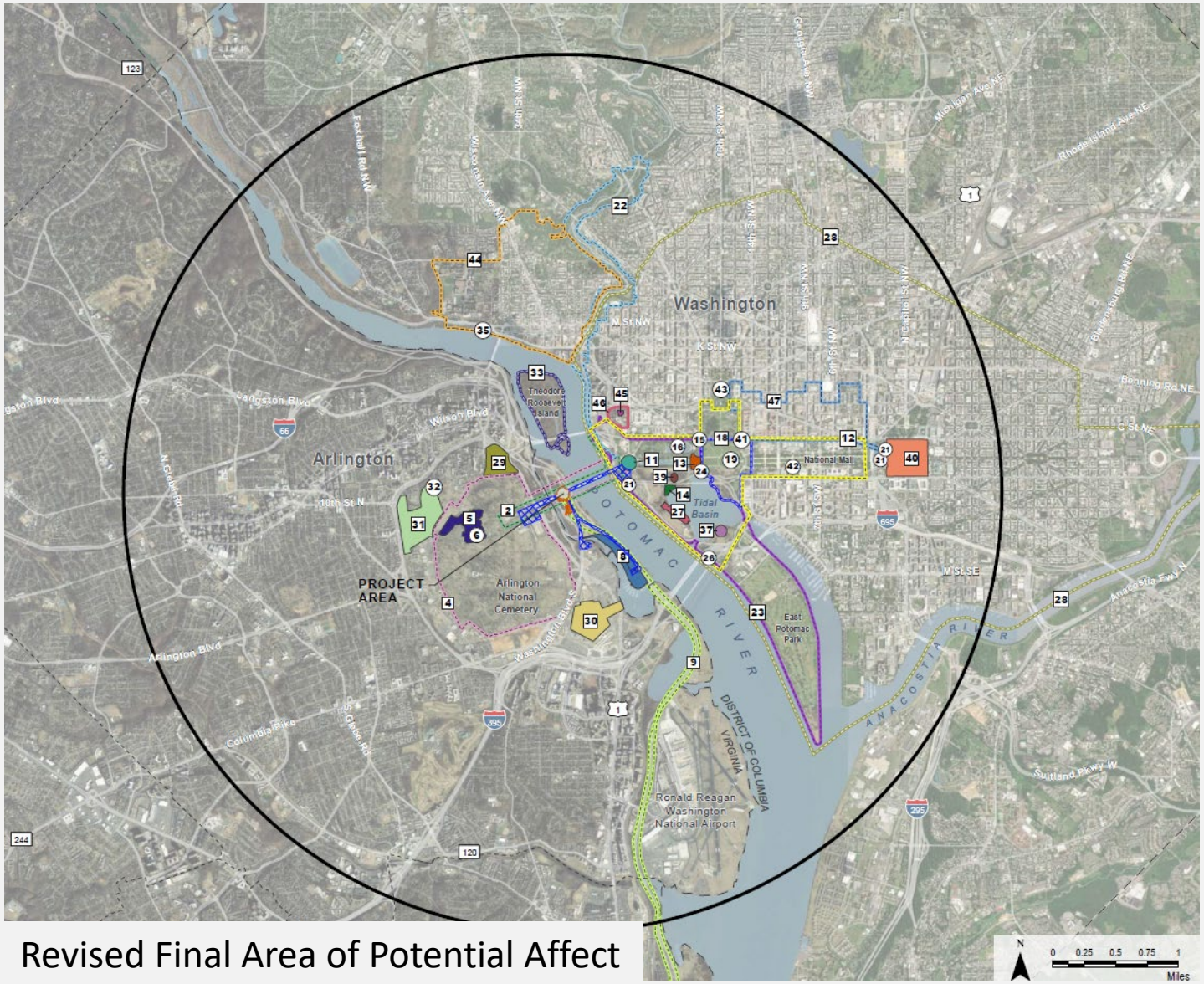


Environmental Considerations

To comply with the National Environmental Policy Act, the NPS prepared an Environmental Assessment (EA) analyzing the alternatives and evaluating the potential environmental effects associated with constructing the proposed Triumphal Arch on the George Washington Memorial Parkway. The EA was prepared in accordance with 516 DM 1, U.S. Department of the Interior, Handbook of National Environmental Policy Act Implementing Procedures, February 2026 (DOI NEPA Handbook) and its appendices, along with the National Environmental Policy Act Implementing Regulations at 43 Code of Federal Regulations (CFR) Part 46.

The Environmental Assessment was completed in October 2026 and was submitted with the design materials. The FONSI documents the NPS's determination that the proposed Triumphal Arch in Memorial Circle would not result in significant environmental impacts. The final FONSI was signed on October 9, 2026.

Historical Considerations



Revised Final Area of Potential Affect

NPS initiated the Section 106 process of the National Historic Preservation Act on June 5, 2026. NPS prepared a draft Assessment of Effects and Memorandum of Agreement on June 5th and held consulting parties meetings on June 15th and September 9th. NCPC designated NPS lead agency for Section 106.

On September 22, 2026 NPS forwarded a summary of its consultation efforts for the proposed arch to the Advisory Council on Historic Preservation (ACHP). On September 24, 2026, ACHP notified NPS and all consulting parties, including NCPC, that it had terminated consultation on the project pursuant to 36 CFR § 800.7(a)(4). ACHP held a meeting on September 29, 2026 to allow consulting parties to provide any views on this undertaking and proposed resolution of adverse effects. ACHP provided its final comments to the Secretary of Interior on October 9, 2026, and the Secretary of Interior responded, which officially concludes the Section 106 process according to the relevant regulations.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION

d. Planning and Sustainability Division

October 22, 2026

National Capital Planning Commission
Attention: Jamie Herr
401 9th Street, NW | Suite 500
Washington, DC 20004

RE: New Monumental Arch (NCPC Case # 8778)

Dear Ms. Herr:

Thank you for the opportunity to provide comments on the August 2026 Arlington Memorial Circle Transportation Access, Safety, and Operations Analysis in advance of the November 5 NCPC Hearing for the New Monumental Arch (case # 8778). The District Department of Transportation (DDOT) previously provided comments, dated June 23, 2026, and June 26, 2026 on the Arlington Memorial Circle Traffic Signal Plan, Temporary Traffic Control Plan (sheets N01 – N10 in the 30% plan set), and Draft Environmental Assessment for the New Monumental Arch. At the time, DDOT noted various deficiencies in the materials provided for review to independently assess the full breadth of impacts on the District's transportation network and whether mitigation on District facilities is necessary.

DDOT received the August 2026 Arlington Memorial Circle Transportation Access, Safety, and Operations Analysis from NCPC on October 13, 2026. DDOT would like to request additional time to provide a more detailed analysis. Specifically, DDOT would like a chance to have direct communications with the applicant and access to the Syncro/Sim Traffic files that the traffic analysis was based on. Enclosed is DDOT's review of the transportation analysis comprising 21 comments, some of which reiterate unresolved items from DDOT's earlier review in June. DDOT's current comments request additional data, justifications or bases for various assumptions, clarification of various findings, and a safe, ADA-compliant Maintenance of Traffic Plan during construction. Based on the materials made available to review on this project to date, DDOT expresses concerns regarding the safety of multimodal transportation around the Arlington Memorial Circle with the addition of a New Monumental Arch, as well as during construction.

We look forward to responses from the design team on these comments and for the ability to review further planning milestones as the design progresses. Should you have any questions, please contact Erkin Ozberk, Development Review Program Manager, at erkin.ozberk1@dc.gov or 202-409-9189.

Sincerely,

Kelsey E. Bridges

Kelsey Bridges
Associate Director, Planning and Sustainability Division

Project Name: Arlington Memorial Arch

DDOT Comments

Item	Reviewer Name	Source	Comment Date	DDOT Comment	Design Team Response	Response Date	Action	DDOT Comment	Date
1	TSED-ZZ	Arlington Memorial Circle: Transportation Access, Safety, and Operations Analysis Page 2	10/19/2026	The expanded study area includes locations south and west of Memorial Circle but omits the east end of Arlington Memorial Bridge and the connecting District intersections. This omission limits DDOT's ability to evaluate network-wide impacts. The report states that "the queue on the westbound AMB… does not appear to spill back into Lincoln Memorial Circle" (Page 2). This conclusion relies on signal phasing and timing assumptions that DDOT has not reviewed or approved. Queue lengths may be longer if the proposed phasing requires						
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Project Name: Arlington Memorial Arch

DDOT Comments

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Wednesday, October 28, 2026

Kelsey Bridges
Associate Director, Planning and Sustainability Division
Department of Transportation (DDOT)
Government of the District of Columbia

RE: National Park Service (NPS) Responses to the District Department of Transportation (DDOT) Comments dated October 22, 2026, on the Transportation Access, Safety, and Operations Analysis for Triumphal Arch at Arlington Memorial Circle

Dear Kelsey Bridges:

Thank you for your agency's review and associated comments on the Transportation Access, Safety, and Operations Analysis. Please kindly note that some comments that were submitted appear to have been inadvertently truncated when the spreadsheet was exported to PDF. The responses provided below address the available comment contents to the extent possible. The National Park Service (NPS) appreciates your input and remains committed to continued coordination throughout the project.

Comment #1 | PDF Page/Sheet: 2

- **Comment:** "The expanded study area includes locations south and west of Memorial Circle but omits the east end of Arlington Memorial Bridge and the connecting District intersections. This omission limits DDOT's ability to evaluate network-wide impacts.

  The report states that 'the queue on the westbound AMB… does not appear to spill back into Lincoln Memorial Circle' (Page 2). This conclusion relies on signal phasing and timing assumptions that DDOT has not reviewed or approved. Queue lengths may be longer if the proposed phasing requires [remaining text clipped in source]."
- **Response:** NPS does not anticipate impacts to DDOT roadways at this time but remains committed to continued coordination through the signal permit process.

Comment #2 | PDF Page/Sheet: 7

- **Comment:** "The Friday PM data show 'zero (0) throughput' between 6:30 PM and 9:30 PM (Page 7), which is highly abnormal. Please confirm whether Arlington Memorial Bridge was closed during this period and document the cause."
- **Response:** Arlington Memorial Bridge was closed to public vehicular traffic on Friday, June 12, 2026 from approximately 6:30 PM to 11:59 PM for Freedom 250th events. Please note that volumes in the late evening were not the basis for any modeling.

Comment #3 | PDF Page/Sheet: 15

- **Comment:** "Table 4 presents peak-month daily visitation estimates of 2,000, 5,800, and 22,400 people, yet Table 5 shows only 0, 40, and 80 vehicle trips in the AM, PM, and Saturday peak hours (Page 15). The report does not demonstrate how these volumes were derived or which visitation scenario they represent.

  Please provide:
  - Hourly visitor profiles for each scenario
  - Mode share and vehicle occupancy assumptions

    - Distinction between visitors already in the area vs. new trips or rerouted trips
    - Justification for the zero-AM assumption and the 50/50 arrival–departure split"
- **Response:** Several potential growth scenarios were presented to evaluate signal operations under conservative, high-visitation conditions. To account for high pedestrian demand, the signal analysis assumed pedestrian recall during each applicable signal phase, providing pedestrian service every cycle regardless of whether a crossing request was registered. Meanwhile, the geometric design accommodates pedestrian volumes associated with the high-visitation scenario through sufficient crosswalk widths and pedestrian queuing capacity. Pedestrian level of service calculations were conducted to ensure that even high volumes of pedestrians could be accommodated during each phase.

  The vehicle demand estimates presented in Table 5 are additional vehicle trips to the area, generated by the Triumphal Arch, not existing trips (e.g., those visiting Arlington National Cemetery). These additional trips assume that access to the site will operate similarly to other nearby monuments, with limited ticketed entry helping to manage demand. Most visitors are also expected to arrive at an off-site location and continue to the site on foot or by bicycle, visiting as one stop within a broader National Mall experience rather than as a standalone destination.

Comment #4 | PDF Page/Sheet: 15, 16, 17

- **Comment:** "The proposed signalized concept removes the Washington Boulevard northbound through movement to Arlington Boulevard and the northbound left-turn movement to Memorial Avenue (Pages 15–17). The report does not explain the rationale, feasibility, or enforcement mechanism for eliminating these movements.

  The site plan and signal plan still depict the approach lane, and without Synchro files, DDOT cannot verify the proposed phasing. Removal of movements cannot be justified solely by improved operational results.

  Moreover, in Figure 15, there is no easily accessible alternative route for the northbound left turn traffic originating from GWMP."
- **Response:** The northbound through movement from Washington Boulevard serves extremely low traffic demand. Eliminating the movement allows the high-volume movements from the circle toward eastbound Arlington Memorial Bridge and northbound Washington Boulevard to Arlington Memorial Bridge to operate concurrently, improving intersection efficiency. In addition to operational benefits, restricting the movement also eliminates a vehicle conflict point, while the associated lane removal shortens the pedestrian crossing distance and reduces pedestrian exposure time. It's anticipated that northbound through traffic destined for Arlington Boulevard will use the bypass beneath Arlington Memorial Bridge as an alternative route. Northbound through traffic destined for Arlington National Cemetery is expected to use nearby alternative routes, as shown in Figure 15, with diverted traffic volumes not anticipated to materially affect traffic operations. During each of the three analysis periods, 40 or fewer vehicles were expected to require diversion due to the elimination of this movement. Vertical channelization elements integrated into the surrounding landscape design are expected to prevent this movement. These elements will be further refined as the design progresses.

Comment #5 | PDF Page/Sheet: 20

- **Comment:** "The report states that the signal operation 'presents the maximum number of pedestrian phases called to the signal' (Page 20). Please clarify whether this refers to pedestrian recall, maximum service frequency, or another modeling assumption. DDOT cannot verify results without reviewing the Synchro files."
- **Response:** The signal analysis assumed pedestrian recall was enabled for all modeled pedestrian phases, providing pedestrian service every cycle regardless of whether a crossing request was registered. This assumption was used to evaluate traffic operations under a high-visitation pedestrian scenario.

Comment #6 | PDF Page/Sheet: 21

- **Comment:** "The report asserts that the 95th percentile queue 'will likely only occur for a few minutes during the entire peak hour' (Page 21). This cannot be inferred without reporting upstream blockage frequency and duration. In extreme cases, queues may persist for the full hour, making the 95th percentile queue equivalent to the average and maximum queue."
- **Response:** The study team acknowledges that queuing may persist beyond the anticipated duration under certain operating conditions; however, the associated queue lengths are not expected to extend to upstream intersections or obstruct upstream traffic movements. This consideration will inform subsequent refinements to the operational analysis as the design progresses.

Comment #7 | PDF Page/Sheet: 22–24

- **Comment:** "Tables 7–9 show delay and queues on several free-flow approaches under Existing Conditions (Pages 22–24). Please explain the source of delay for these movements."
- **Response:** The minor delays indicated in Tables 7-9 on several free-flow approaches are attributable to speed reductions associated with turning maneuvers and associated vehicle interactions. Vehicles are expected to operate at these approaches without stopping, but they may make minor speed adjustments. These speed adjustments result in limited delay, with operations remaining at LOS A.

Comment #8 | PDF Page/Sheet: 22

- **Comment:** "The delay at Int #2 Washington Blvd at GWMP Ramp Merge shows significant drop in Future Baseline scenario compared to Existing Condition, despite the assumed traffic growth. Please explain."
- **Response:** The improvement in the reported MOEs reflects variability between SimTraffic simulation runs rather than an anticipated improvement in future traffic conditions. The simulation uses random seeds to represent variations in vehicle arrivals and driver behavior, which can produce modest differences in results even under similar operating conditions.

Comment #9 | PDF Page/Sheet: 22

- **Comment:** "Under Future Build scenario, the delay and LOS for Ramp NB L movement at #Int 3 Memorial Ave at Richmond Hwy Off-Ramp increased significantly compared to Existing and Baseline. Please explain the contributing factors."
- **Response:** Northbound left-turn delay increases by approximately 30 seconds during the AM peak period, with no increase during the PM or Saturday analysis periods. This increase is primarily attributable to the modeling assumption that all traffic diverted by the elimination of the northbound through/left-turn movement from Washington Boulevard at AMC would reroute to Richmond Highway.

Comment #10 | PDF Page/Sheet: 22

- **Comment:** "Eastbound queues at Int #1e spill back into Int #3 during both AM and PM peaks (Page 22). The northbound right-turn movement at Int #3 carries heavy volumes, and spillback would prevent discharge, causing additional congestion on Richmond Hwy and GWMP. The current model does not seem to capture this interaction and the potential impact."
- **Response:** The SimTraffic model accounts for queue spillback from the eastbound approach at Intersection #1e into Intersection #3. The northbound right-turn movement at Intersection #3 exhibits average queue lengths of 121 feet and 51 feet and 95th-percentile queue lengths of 443 feet and 272 feet during the AM and PM peak periods, respectively. Although spillback from Intersection #1e may intermittently affect operations at Intersection #3, the resulting queues are not expected to disrupt traffic operations along northbound Richmond Highway or southbound GWMP.

Comment #11 | PDF Page/Sheet: 22

- **Comment:** "The existing delays and queues at Int #5 - Richmond Hwy Ramp at GWMP Ramp does not appear to match or calibrated with the real world condition. Google Typical Traffic shows congestion for both AM and PM peaks.

  Please share the Synchro/SimTraffic models and explain how the model represents the weaving and lane changes at this intersection, and explain if Synchro/SimTraffic is an adequate tool that can represent a critical interaction like this.

  Same for Future Baseline and Future Build scenarios."

- **Response:** Synchro/SimTraffic was selected as an appropriate tool for this stage of the analysis in order to evaluate the proposed lane configurations, signal operations, delay, and queuing, particularly due to the interactions between closely spaced intersections. The proposed design does not introduce yield-controlled interactions, new weaving conditions, or substantial changes to traffic within existing weaving operations that would be appropriate for the more detailed behavioral modeling available in VISSIM. However, although the analysis did not identify substantial operational impacts to the existing merge of the GWMP and Richmond Highway ramps approaching Memorial Ave, NPS recognizes this area as a location where VISSIM could provide additional analytical value and will consider its use for future analyses.

Comment #12 | PDF Page/Sheet: 27

- **Comment:** "Please evaluate each pedestrian waiting area and crossing separately, using net usable space after poles, bollards, accessible routes, and circulation paths are deducted."
- **Response:** The detailed geometry of individual pedestrian waiting areas and crossings will be refined during subsequent design phases, accounting for bollard placement, accessible route requirements, and other physical constraints that affect the effective width and usable area available for pedestrian queuing and crossing.

Comment #13 | PDF Page/Sheet: 27

- **Comment:** "The calculated pedestrian delay appears to be per-crossing estimates, not a complete route evaluation. Please clarify whether delays reflect single-stage or multi-stage crossings."
- **Response:** The calculated pedestrian crossing delay provided in the analysis is a per-crossing estimate. As design development progresses, NPS will evaluate strategies to minimize cumulative pedestrian delay along pedestrian routes to the extent feasible. This evaluation may include a multi-

stage pedestrian delay analysis to quantify cumulative delay across sequential crossings and inform signal phasing and coordination.

Comment #14 | PDF Page/Sheet: 28

- **Comment:** "In Figure 21 MOT for the two-way circulation, there would not be space for the westbound vehicles to queue at the proposed temporary pedestrian crossing, when there is a pedestrian call placed. The inner lane for the westbound approach has to be thru only while the outer lane should be marked as right turn only."
- **Response:** NPS intends to shift the proposed crossing farther west during subsequent design iterations to provide sufficient queue storage for westbound vehicles without obstructing right-turn movements.

Comment #15 | PDF Page/Sheet: 12

- **Comment:** "Table 2 uses 11:15 a.m.-12:15 p.m. and noon-1:00 p.m. as two of its four hours. These overlap by 15 minutes, so the table does not document four distinct hours as presented. MUTCD Section 4C.01, paragraph 15, specifies nonoverlapping separate hours.

  Correct Table 3 title to reference the south crosswalk at Washington [remaining text clipped in source]."

- **Response:** The second period should read "12:15 PM to 1:15 PM" and will be corrected in any future iterations of the analysis.

Comment #16 | PDF Page/Sheet: 31

- **Comment:** "The availability of a 60-foot roadway and an assertion of ANC parking capacity do not establish that the proposed operation can accommodate peak demand without blocking travel lanes, accessible loading, pedestrian routes, or emergency access.

  The PUDO maneuvers can cause friction and thus impact the capacity. It's unclear how the models capture such effect."

- **Response:** Different demand scenarios were considered to ensure signal operations were evaluated under a conservative, high-visitation condition. Pick-up and drop-off facilities and adjacent roadways are not sized to accommodate the maximum theoretical demand, as doing so could require disproportionate curb space and the creation of parking lots for infrequent surges in activity. Instead, curbside activity considers practical operating capacity, with occasional demand surges addressed through operational management. However, NPS recognizes that modeling the weaving and merging interactions associated with curbside activity using a tool such as VISSIM could provide additional analytical value and will consider its use in future analyses.

Comment #17 | PDF Page/Sheet: 28

- **Comment:** "The temporary two-way circulation layout needs to be proved to be feasible using AutoTurn analysis, considering the truck swept paths, emergency response, etc."
- **Response:** NPS will incorporate vehicle swept-path analysis using AutoTURN into subsequent design iterations to verify the feasibility of the temporary two-way circulation layout for applicable design vehicles, including trucks and emergency response vehicles. The layout will be refined as needed to accommodate turning maneuvers, vehicle clearance requirements, and emergency access.

ARLINGTON VIRGINIA

DEPARTMENT OF ENVIRONMENTAL SERVICES
Division of Transportation

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October 22, 2026
SENT VIA EMAIL: jamie.herr@ncpc.gov

Jamie E. Herr, AICP
Community Planner, Current Planning Division
National Capital Planning Commission
401 9th Street, NW
Washington, DC 20004

RE: Review of Transportation Access, Safety, and Operations Analysis for Triumphal Arch at Arlington Memorial Circle

Dear Jamie Herr:

Thank you for your notification dated October 13, 2026, regarding the proposed Triumphal Arch at Arlington Memorial Circle (AMC) and request for Arlington County comments on the applicant's Transportation Access, Safety, and Operations Analysis. We acknowledge the feedback deadline of October 22, 2026, and note that the requested nine-day review period is significantly shorter than the typical 60-day review period provided by the National Capital Planning Commission (NCPC) for projects impacting Arlington County. As a result, this compressed review period will negatively impact the County's ability to provide a comprehensive response to the proposed project and assessment of the transportation impacts to Arlington County.

In this letter, we provide Arlington County staff feedback regarding the transportation analysis document provided on October 13, 2026, for the proposed Triumphal Arch at Arlington Memorial Circle project. The AMC road network connects to Arlington County, and changes to this site will impact on Arlington's transportation network. Arlington County Division of Transportation (DOT) reviewed the transportation analysis for the proposed project and identified concerns related to safety and operations for all modes, analysis methodology, maintenance of traffic, and multimodal design, with detailed comments provided in Attachment 1.

- *Multimodal Safety and Operations:* The analysis focuses primarily on pedestrian and vehicle operations and does not include a similar level of detail for bicycles, nor does it include a robust safety analysis. Furthermore, it lacks a complete assessment of broader circulation patterns for all modes or an analysis of existing sidewalk and trail widths to determine the additional space needed to safely accommodate increased pedestrian, bicycle, and micromobility volumes.
    - The analysis lacks detailed information related to pedestrians, bicycles, and micromobility circulation to, through, and around the edges of the circle. AMC provides a critical regional connection between the Mount Vernon Trail, the Route 110 Trail, Arlington Memorial Bridge, and the broader regional trail network and key destinations, including Arlington National Cemetery, Rosslyn, and Washington, DC.
    - The analysis includes a more detailed assessment of pedestrian crossing impacts, including Pedestrian Level of Service, but does not include an equivalent assessment for bicycle traffic despite bicycles accounting for 40-50% of multimodal

users. These users need to be considered alongside pedestrians in the crossing analysis. The sidewalks and trails adjacent to the proposed crossings likewise should be analyzed to understand the space needed to accommodate the combination of 1) projected volumes of pedestrians and bicyclists waiting to cross and 2) projected pedestrian and bicycle through volumes.
    - The report does not include a safety analysis of existing and future safety conditions, which is critical given the volume of pedestrian and bicyclist demand resulting from this project.

- *Traffic Safety and Operations:*
    - The report indicates that there are major operational issues to the south of the site where the George Washington Memorial Parkway (GWMP) and Washington Boulevard merge. The report claims that the impacts from the project do not reach this area, but in reality, the delays and queuing at the weave are essentially metering traffic into the study area, which means the demand at the circle is underestimated. There are no planned improvements or mitigations to this condition despite the projected increase in pedestrian and vehicular volumes. Unless this condition is improved, the results of the analysis artificially inflate the safety and operations at AMC.
    - County comments note additional operational and safety concerns with the GWMP/Washington Boulevard merge area, as future conditions may worsen queueing and congestion.
    - The analysis identifies curbside space for pick-up and drop-off (PUDO) along Memorial Avenue but does not assess the level of PUDO demand expected and whether the proposed supply is sufficient to meet this demand. Increased PUDO activity that is not accommodated along the curb will spill over into adjacent street space, creating safety and operations issues for all modes. Given the anticipated demand in traffic, a transportation management plan should be developed.
    - A safety analysis of existing and future safety conditions is not provided. This is critical given the numerous weaves and merges on roadways surrounding AMC. The analysis does not address the crash hotspots that were identified in the Memorial Circle Safety Improvements Environmental Assessment dated November 2018.

- *Traffic Analysis Methodology:*
    - The County continues to recommend that the analysis include more robust multimodal traffic analysis tools, such as VISSIM. More detailed traffic analysis is needed to fully understand how AMC, the proposed signalization, bike/pedestrian crossings, and travel lane changes would operate for all modes. The tools used for the analysis – Synchro and SimTraffic – do not include sufficient level of detail to assess these impacts.
    - The 2031 buildout year should be extended to a longer planning horizon that incorporates long-range regional growth, land use changes, and transportation network improvements as part of the analysis.

- *Maintenance of Traffic (MOT) During Construction:*
    - The temporary traffic closures and detours described during construction will have regional traffic impacts that need to be considered beyond the immediate

work area. A broader detour and circulation plan is needed to understand how regional traffic will be redirected around and outside of the work area and the traffic impacts of those detours on parallel roadways.
    - The MOT does not adequately accommodate detours for both pedestrians and bicyclists. Detours need to be sufficiently wide, clearly signed for all modes, and as direct as possible to support two-way multimodal travel.

- *Multimodal Design:* The estimated increases in pedestrian and bicycle volumes require sufficiently wide facilities, including the adjacent sidewalks and trails leading to and through the study area, to safely accommodate a high volume of two-way pedestrian, bicycle, and micromobility traffic with a mixing of modes and travel speeds.
    - The current design does not adequately accommodate future demand for projected growth from approximately 1,400 current daily pedestrian and bicycle users to as many as 22,400 total daily users.
    - Based on these volumes, the design needs to include more space on adjacent sidewalks and trails to accommodate pedestrian crowding and queueing at signals and minimize conflicts with moving two-way pedestrian, bicycle, and micromobility traffic.
    - Pedestrian and bicycle access routes between the project area and nearby Metro station entrances need to be factored into the analysis and considered for improvements to sufficiently accommodate increased volume.

In general, the analysis does not sufficiently address operational and safety concerns that will affect all modes of travel as well as public safety services during and after construction. Thank you again for including us in this process.

Sincerely,

Dan Nabors, P.E.
Director, Division of Transportation
Arlington County Department of Environmental Services

Attachment 1

CC: Mark Schwartz, County Manager
Shannon Flanagan-Watson, Deputy County Manager
Michelle Cowan, Deputy County Manager
Greg Emanuel, Chief Environmental Officer, Department of Environmental Services (DES)
Jane Rudolph, Director, Department of Parks and Recreation (DPR)
Erik Beach, Parks Planning Division Chief, DPR
Samia Byrd, Director, Department of Community Planning, Housing and Development (CPHD)
Anthony Fusarelli, Jr., Planning Division Chief, CPHD
Chikwe Njoku, Neighborhood Services Division Chief, CPHD
Lorin Farris, Historic Preservation Section Supervisor, CPHD
Jennifer Smith, Comprehensive Planning Manager, CPHD
Matt Ladd, Comprehensive Planning Section Supervisor, CPHD

Arlington County Division of Transportation (DOT) Comments

Triumphal Arch at Arlington Memorial Circle			
Transportation Access, Safety, and Operations Analysis Comments from Arlington County			
Comment Number	PDF Page #	Sheet #	Comment
1	1		The report should include pedestrian, bicycle and micromobility circulation improvements around the Circle. The existing network around the circle is an importation bicycle/micromobility connection from the MVT to Washington D.C. Arlington National Cemetery, Rosslyn and Points South.
2	1		Bicycle counts should be included in the report early with the pedestrian counts
3	12		Report indicates an increase in pedestrian and bicycle arrivals to ANC and future memorial site from 1400 per day, existing, up to 22,400 per day, future. Bicycle, Scooter, and Capital Bikeshare parking/docking stations should be provided to accommodate the projected increase in visitors by bicycle, scooter and shared micromobility. Bicycle/Scooter/Bikeshare stations provided with the ANC Entry Area Corridor Project would be insufficient. Providing designated parking spaces around Metro Rail will ensure that more people are able to arrive by other modes than automobile. Providing designated bicycle and micromobility parking spaces will encourage people to park outside of the memorial space and prevent clutter/unwanted parking under the Arch.
4	12		No mention of improvements to existing trails such as widening to accommodate existing and projected increases to walking and biking within the Study.
5	12		The Study does not provide Bicyclist Level of Service and delay calculations despite the notated projected increases to biking within the project vicinity and trail network.
6	12		Section 3.4.1 Acknowledges the 1,400 daily pedestrian and bicycle trips at AMC are expected to increase between 40% and 1500%, or between 2,000 pedestrians and 22,400 pedestrians using AMC on a daily basis. The proposed plan does not accommodate the growth this projected growth.

7	15		Clarify why vehicle trip generation rates are expected to be 0 during the weekday AM peak hour factoring ANC operations and staff entering the proposed site.
8	15		It is unclear from the Study how the AMC will be modified or signalized to prevent NB through and left turn movements from occurring from Washington Blvd.
9	22		Why do the MOEs for Washington Blvd at study intersection #2 improve under no-build (future baseline) conditions?
10	22		The MOE for Washington Blvd at study intersection #2 in the future build condition are significantly worse in the AM peak period between the Future Baseline to the Future Build Scenario. The queuing spills back across the bridge towards the Pentagon north parking access. This project should propose mitigations for the exacerbated issues at the merge. Conversely, please explain how the results show that Washington Blvd MOE improve with the build condition over the future baseline condition in the PM peak period? The diverted volumes are low and should not result in such a drastic improvement to the delay and queuing.
11	22-23		The queuing from Study intersections #1a and #1b appear to influence each other in the future build scenario for the AMC approaches. Please confirm through simulation that the results accurately capture queuing from both stop bars.
12	26		The HCM explicitly considers the width of sidewalks and trails, usually through the concept of effective width, when determining pedestrian and bicycle LOS yet this was not taken into consideration as part of this study.
13	26-27		The additional information on Pedestrian LOS and available median square footage is noted, and a similar level of analysis is needed for the square footage of adjacent sidewalks/trails on both ends of each crossing so that the waiting space for pedestrians is scaled appropriately. The study should reference applicable design guidance (such as the Shared Use Path Level of Service guidance in the AASHTO Guide for the Development of Bicycle Facilities) to determine the appropriate width of the adjacent sidewalks to accommodate both 1) projected crossing volumes per signal cycle waiting to cross and 2) projected volumes of 2-way pedestrian and bicycle traffic. If additional waiting space at the crosswalk approaches is not provided,

			pedestrians waiting to cross will block the 2-way movement along adjacent sidewalks/multi-use trails, including connections to Arlington Memorial Bridge and the Mount Vernon Trail. The study notes the already high existing volumes of pedestrians and bicyclists, with increases of 40-1,500% projected.
14	28		Proposed pedestrian detour should also include bicyclists riding to/from the 110 Trail
15	28		The proposed 6' sidewalk detour needs to be widened to accommodate 2-way pedestrian and bicycle traffic. As noted throughout the document there is a high mixing of these two modes along adjacent trails and sidewalks, and the detour needs to be sufficiently wide for 2-way moving bike and ped traffic to safely navigate the detour (10' minimum clear width).
16	28		Revise all pedestrian signage to indicate both pedestrians and bicyclists.
17	31		Again, Bicycle, Scooter, Capital bikeshare parking/stations should be planned for and included in this section
18	31		MVT Trail through users should be separated from people visiting the Arch.
19	31		Given anticipated levels of attendees visiting the AMC and one-hour turnover of visitors as illustrated in the Study, the proposed curbside loading/unloading of passengers appears insufficient for TNC vehicles, tour buses, delivery vehicles, and personal vehicles. Demonstrate how adequate space will be provided for peak visitation periods at the AMC.
20		M04-M06	Show Mount Vernon Trail Connections where they exist
21		P01,P03	Recommend a sidewalk, at least, around the southern portion of the circle to separate trail users from people wishing to visit the Arch. Current MVT trail widths are not wide enough to accommodate projected pedestrian and bicyclist volume. The increase in volume would create additional conflicts and degrade the LOS of the trail. AASHTO Guide for the Development of Bicycle Facilities 6.4.3. Recommended Sared Use Path Widths
22		P03	The eliminated movement from Washington Blvd through the circle should be reinforced with some channelizing devices, such as bollards or flexposts to keep drivers from attempting the maneuver.
23		N06	Detour must be provided for the closure of the Mount Vernon Trail. If possible leave the southern Crosswalk open during this phase and direct users around the circle to Mem. Bridge

24	General		A detailed safety analysis of existing and future safety conditions is not provided. This is critical given the different modes currently interacting and expected to interact in the future. No safety analysis of weaves and merges. No analysis showing how crash hotspots would be addressed identified in the Memorial Circle Safety Improvements Environmental Assessment dated November 2018.
25	General		The report indicates that there are major operational issues to the south of the site where the GW Parkway and Washington Blvd merge. The report notes that the delays and queuing at the weave essentially meter traffic into the study area. There are no planned improvements or mitigations to this condition despite the increase in pedestrian and vehicular volumes. This project needs to mitigate the impacts at the critical weaving section through improvements to either the roadway geometry or operations.
26	General		The Build year of 2031 is utilized as the future condition, but there is no planning year analysis that reflects regional background growth or planned COG model changes to land use and transportation infrastructure. Typically, for modifications to interchanges such as those this project is proposing, we would utilize a planning horizon at least 20 years into the future.
27	General		There are no provisions to provide improvements to the sections of memorial drive between the project area and the metro access. Since the metro station is likely the point of access for a large number of visitors, there should be attention and mitigation of conflicts along the pedestrian paths from the metro station to the planned monument.
28	General		Passive Pedestrian detection will be result in higher pedestrian delay at the signalized locations due to the conflux of shared use paths and likelihood that bicycles will be utilizing the crossings. For example, detection of approaching bicycles prior to waiting in the landing area will be difficult. It is likely that the pedestrian activations will occur every cycle during the peak periods so the simulation tools used should reflect this accurately.
29	General		Where conditions are oversaturated or there are major multimodal operational impacts, VISSIM should be utilized to simulate the interactions between the modes as well as sections of the weave areas where queuing is impacting operations. Synchro/SimTraffic is not a good tool to show conflicts between pedestrians and yielding vehicles. The permitted conflicts between pedestrians

			and yielding vehicles might not be accurately shown with this tool. Synchro should not be used to model weaving condition, hence results further upstream might not be accurately depicted.
30	General		There is a substantial amount of bicycle traffic that travels around the existing circle to access the regional trail network (including the Mount Vernon Trail and Washington Boulevard Trail) and Washington DC. The study provides detail on Pedestrian LOS but does not provide a similar metric that accounts for the high volumes of existing and projected bicycle activity, and the high level of mixing of pedestrian and bicycle traffic that occurs throughout the study area. Consider safe and direct bicycle movements in the alignments and design of the sidewalks, crossings, and construction detours in the project area, such as sufficiently wide sidewalks, curb ramps, and crosswalks to accommodate high-volume two-way mixed pedestrian and bicycle traffic, as well as desire lines for bicyclists particularly between the MVT, ANC, Washington Blvd Trail, and Memorial Bridge.
31	General		Given anticipated volumes of vehicles, pedestrians, and bicyclists during the peak hour, demonstrate how signalized crossing movements will be enforced.

Wednesday, October 28, 2026

Dan Nabors, P.E.
Director, Division of Transportation
Arlington County Department of Environmental Services
2100 Clarendon Boulevard, Suite 900
Arlington, VA 22201

RE: National Park Service (NPS) Responses to Arlington County Division of Transportation (DOT) Comments dated October 22, 2026, on the Transportation Access, Safety, and Operations Analysis for Triumphal Arch at Arlington Memorial Circle

Dear Dan Nabors:

Thank you for your agency's thoughtful review and associated comments on the Transportation Access, Safety, and Operations Analysis. Please see responses to the provided comments below. The National Park Service (NPS) appreciates your input and remains committed to continued coordination throughout the project on potential impacts within your agency's jurisdiction.

Comment #1 | Page/Sheet: 1

- **Comment:** "The report should include pedestrian, bicycle and micromobility circulation improvements around the Circle. The existing network around the circle is an importation bicycle/micromobility connection from the MVT to Washington D.C. Arlington National Cemetery, Rosslyn and Points South."
- **Response:** The proposed improvements include enhancements to pedestrian, bicycle, and micromobility circulation around the Circle through realigned and widened pathways consistent with the surrounding network, as well as new traffic signals to provide safer crossing opportunities. The needs of pedestrians, cyclists, and micromobility users will continue to inform the design as it progresses.

Comment #2 | Page/Sheet: 1

- **Comment:** "Bicycle counts should be included in the report early with the pedestrian counts."
- **Response:** Bicycle volumes were captured during data collection but were reported in combination with pedestrian volumes for the purpose of the warrant analysis.

Comment #3 | Page/Sheet: 12

- **Comment:** "Report indicates an increase in pedestrian and bicycle arrivals to ANC and future memorial site from 1400 per day, existing, up to 22,400 per day, future. Bicycle, Scooter, and Capital Bikeshare parking/docking stations should be provided to accommodate the projected increase in visitors by bicycle, scooter and shared micromobility. Bicycle/Scooter/Bikeshare stations provided with the ANC Entry Area Corridor Project would be insufficient. Providing designated parking spaces around Metro Rail will ensure that more people are able to arrive by other modes than automobile. Providing designated bicycle and micromobility parking spaces will encourage people to park outside of the memorial space and prevent clutter/unwanted parking under the Arch."

- **Response:** Opportunities to incorporate bicycle and scooter parking and shared micromobility docking stations will be evaluated in later phases as the design progresses. These facilities are anticipated to be located outside of the central circle, while maintaining convenient connections to the surrounding pedestrian and bicycle network, to encourage parking and docking outside of the site's perimeter.

Comment #4 | Page/Sheet: 12

- **Comment:** "No mention of improvements to existing trails such as widening to accommodate existing and projected increases to walking and biking within the Study."
- **Response:** Walkways within the site boundaries will be widened to provide continuity with the surrounding multiuse trail network. Proposed widths and transitions will account for the constrained pathway connections along Arlington Memorial Bridge and Memorial Avenue Bridge, where limited opportunities for widening could create pinch points in the network. The nearby portion of the Mount Vernon Trail is also being widened through a separate Mount Vernon Trail – North project.

Comment #5 | Page/Sheet: 12

- **Comment:** "The Study does not provide Bicyclist Level of Service and delay calculations despite the notated projected increases to biking within the project vicinity and trail network."
- **Response:** Projected increases in bicycle activity do not, by themselves, establish the need for separate bicycle level of service and delay calculations. Bicycle volumes were captured during data collection but were reported in combination with pedestrian volumes for the purpose of this phase of the analysis. As the design progresses, we will assess whether additional bicyclist operational analysis is warranted at signalized crossings to inform the design.

Comment #6 | Page/Sheet: 12

- **Comment:** "Section 3.4.1 Acknowledges the 1,400 daily pedestrian and bicycle trips at AMC are expected to increase between 40% and 1500%, or between 2,000 pedestrians and 22,400 pedestrians using AMC on a daily basis. The proposed plan does not accommodate the growth this projected growth."
- **Response:** Section 3.4.1 presents several potential growth scenarios to evaluate operations under a conservative, high-visitation condition. To account for this demand, the signal analysis assumed pedestrian recall during each applicable signal phase, providing pedestrian service every cycle regardless of whether a crossing request was registered. The geometric design also prioritized crossing widths and pedestrian queuing areas to accommodate the anticipated demand.

Comment #7 | Page/Sheet: 15

- **Comment:** "Clarify why vehicle trip generation rates are expected to be 0 during the weekday AM peak hour factoring ANC operations and staff entering the proposed site."
- **Response:** Based on visitation patterns at comparable sites, visitation demand is not expected to meaningfully overlap with the weekday AM peak hour. A small number of additional vehicle trips associated with staff arrivals and other site-related activities may occur during the AM peak hour;

however, the resulting incremental traffic demand is anticipated to have a negligible effect on traffic operations.

Comment #8 | Page/Sheet: 15

- **Comment:** "It is unclear from the Study how the AMC will be modified or signalized to prevent NB through and left turn movements from occurring from Washington Blvd."
- **Response:** Prohibited movements are anticipated to be deterred through vertical channelization integrated with the surrounding landscape design. The design of these elements will be further refined as the design progresses.

Comment #9 | Page/Sheet: 22

- **Comment:** "Why do the MOEs for Washington Blvd at study intersection #2 improve under no-build (future baseline) conditions?"
- **Response:** The improvement in the reported MOEs reflects variability between SimTraffic simulation runs rather than an anticipated improvement in future traffic conditions. The simulation uses random seeds to represent variations in vehicle arrivals and driver behavior, which can produce modest differences in results even under similar operating conditions.

Comment #10 | Page/Sheet: 22

- **Comment:** "The MOE for Washington Blvd at study intersection #2 in the future build condition are significantly worse in the AM peak period between the Future Baseline to the Future Build Scenario. The queuing spills back across the bridge towards the Pentagon north parking access. This project should propose mitigations for the exacerbated issues at the merge. Conversely, please explain how the results show that Washington Blvd MOE improve with the build condition over the future baseline condition in the PM peak period? The diverted volumes are low and should not result in such a drastic improvement to the delay and queuing."
- **Response:** The results shown in the analysis reflected variability among SimTraffic simulation runs. These simulations use random seeds to represent variations in vehicle arrivals and driver behavior, which can produce modest differences in results even under similar operating conditions**.** To reduce the influence of run-to-run variability, five new simulation runs were completed for the AM peak hour, and the resulting MOEs were averaged. The updated results are presented in the attached table and corresponding queue length graphic.

  Relative to the future baseline scenario, the updated results indicate an increase in delay of 18.5 seconds per vehicle, an increase in the 50th-percentile queue length of less than 100 feet, and an increase in the 95th-percentile queue length of approximately 300 feet.

Comment #11 | Page/Sheet: 22–23

- **Comment:** "The queuing from Study intersections #1a and #1b appear to influence each other in the future build scenario for the AMC approaches. Please confirm through simulation that the results accurately capture queuing from both stop bars."

- **Response:** The two signals were modeled as independent operations to estimate queue formation at each location. The queue lengths are measured from each respective stop bar.

Comment #12 | Page/Sheet: 26

- **Comment:** "The HCM explicitly considers the width of sidewalks and trails, usually through the concept of effective width, when determining pedestrian and bicycle LOS yet this was not taken into consideration as part of this study."
- **Response:** Walkways within the site boundaries will be widened to provide continuity with the surrounding multiuse trail network. Proposed widths and transitions will account for the constrained pathway connections along Arlington Memorial Bridge and Memorial Avenue Bridge, where there are limited opportunities for widening. The nearby portion of the Mount Vernon Trail is also being widened through a separate Mount Vernon Trail – North project**.**

Comment #13 | Page/Sheet: 26–27

- **Comment:** "The additional information on Pedestrian LOS and available median square footage is noted, and a similar level of analysis is needed for the square footage of adjacent sidewalks/trails on both ends of each crossing so that the waiting space for pedestrians is scaled appropriately. The study should reference applicable design guidance (such as the Shared Use Path Level of Service guidance in the AASHTO Guide for the Development of Bicycle Facilities) to determine the appropriate width of the adjacent sidewalks to accommodate both 1) projected crossing volumes per signal cycle waiting to cross and 2) projected volumes of 2-way pedestrian and bicycle traffic. If additional waiting space at the crosswalk approaches is not provided, pedestrians waiting to cross will block the 2-way movement along adjacent sidewalks/multi-use trails, including connections to Arlington Memorial Bridge and the Mount Vernon Trail. The study notes the already high existing volumes of pedestrians and bicyclists, with increases of 40-1,500% projected."
- **Response:** The detailed geometry of individual pedestrian waiting areas, crossings, and adjacent infrastructure will be refined during subsequent design phases, accounting for physical constraints that affect the effective width and usable area for non-motorized users to the greatest extent feasible.

Comment #14 | Page/Sheet: 28

- **Comment:** "Proposed pedestrian detour should also include bicyclists riding to/from the 110 Trail."
- **Response:** Please continue to coordinate with the NPS as this connection is developed further to ensure alignment between the two projects.

Comment #15 | Page/Sheet: 28

- **Comment:** "The proposed 6' sidewalk detour needs to be widened to accommodate 2-way pedestrian and bicycle traffic. As noted throughout the document there is a high mixing of these two modes along adjacent trails and sidewalks, and the detour needs to be sufficiently wide for 2-way moving bike and ped traffic to safely navigate the detour (10' minimum clear width)."

- **Response:** Detailed sizing of detour widths will be refined during subsequent design phases. The needs of pedestrians, cyclists, and other micromobility users will continue to inform the detour design as it's further developed.

Comment #16 | Page/Sheet: 28

- **Comment:** "Revise all pedestrian signage to indicate both pedestrians and bicyclists."
- **Response:** Signing and marking plans will be refined as the design develops.

Comment #17 | Page/Sheet: 31

- **Comment:** "Again, Bicycle, Scooter, Capital bikeshare parking/stations should be planned for and included in this section."
- **Response:** Opportunities to incorporate bicycle and scooter parking and shared micromobility docking stations will be evaluated in later phases as the design progresses.

Comment #18 | Page/Sheet: 31

- **Comment:** "MVT Trail through users should be separated from people visiting the Arch."
- **Response:** Pedestrian areas will be refined during subsequent design phases to accommodate anticipated visitor queuing and gathering within existing site constraints while maintaining adequate clear width for through trail traffic.

Comment #19 | Page/Sheet: 31

- **Comment:** "Given anticipated levels of attendees visiting the AMC and one-hour turnover of visitors as illustrated in the Study, the proposed curbside loading/unloading of passengers appears insufficient for TNC vehicles, tour buses, delivery vehicles, and personal vehicles. Demonstrate how adequate space will be provided for peak visitation periods at the AMC."
- **Response:** Different demand scenarios were considered to ensure signal operations were evaluated under a conservative, high-visitation condition. Pick-up and drop-off facilities are not sized to accommodate the maximum theoretical demand, as doing so could require disproportionate curb space and the creation of parking lots for infrequent surges in activity. Instead, curbside activity considers practical operating capacity, with occasional demand surges addressed through operational management.

Comment #20 | Page/Sheet: M04–M06

- **Comment:** "Show Mount Vernon Trail Connections where they exist."
- **Response:** The plans depict the existing connection to the Mount Vernon Trail in the southeastern quadrant of the site.

Comment #21 | Page/Sheet: P01, P03

- **Comment:** "Recommend a sidewalk, at least, around the southern portion of the circle to separate trail users from people wishing to visit the Arch. Current MVT trail widths are not wide enough to accommodate projected pedestrian and bicyclist volume. The increase in volume would create

additional conflicts and degrade the LOS of the trail. AASHTO Guide for the Development of Bicycle Facilities 6.4.3. Recommended Shared Use Path Widths."

- **Response:** Pathways within the site boundaries will be widened with consideration of existing site constraints and connections to the surrounding pedestrian and bicycle network. Dedicated queuing and gathering areas will be provided where visitors are anticipated to linger, separating stationary activity from through movements. Constrained pathway connections along Arlington Memorial Bridge and Memorial Avenue Bridge limit widening opportunities on the east and west sides of the site. The adjacent segment of the Mount Vernon Trail will be widened as part of the separate Mount Vernon Trail – North project.

Comment #22 | Page/Sheet: P03

- **Comment:** "The eliminated movement from Washington Blvd through the circle should be reinforced with some channelizing devices, such as bollards or flexposts to keep drivers from attempting the maneuver."
- **Response:** Prohibited movements are anticipated to be deterred through vertical channelization integrated with the surrounding landscape design. The design of these elements will be further refined as the design progresses.

Comment #23 | Page/Sheet: N06

- **Comment:** "Detour must be provided for the closure of the Mount Vernon Trail. If possible leave the southern Crosswalk open during this phase and direct users around the circle to Mem. Bridge"
- **Response:** NPS will evaluate opportunities to minimize construction impacts on pedestrians and bicyclists to the greatest extent feasible as the design progresses, including maintaining access through the southern crosswalk for the majority of the proposed construction phase and limiting closures to periods when required by construction activities.

Comment #24 | Page/Sheet: General

- **Comment:** "A detailed safety analysis of existing and future safety conditions is not provided. This is critical given the different modes currently interacting and expected to interact in the future. No safety analysis of weaves and merges. No analysis showing how crash hotspots would be addressed identified in the Memorial Circle Safety Improvements Environmental Assessment dated November 2018."
- **Response:** A standalone predictive safety analysis is not necessary at this stage of the design to assess the anticipated safety benefits of the proposed concept relative to existing conditions. Signalization will assign separate phases to conflicting movements, reducing the need for drivers, pedestrians, and bicyclists to identify safe gaps in traffic or rely on other drivers yielding the right-of-way. This separation is intended to reduce conflicts at existing crash hotspots. Together with the proposed lane configurations, signalization is also intended to reduce merging and weaving conflicts and make movements more predictable for all users. These measures provide a technical basis for the anticipated safety benefits within existing site and operational constraints, with targeted safety evaluations to follow as appropriate during later design phases.

Comment #25 | Page/Sheet: General

- **Comment:** "The report indicates that there are major operational issues to the south of the site where the GW Parkway and Washington Blvd merge. The report notes that the delays and queuing at the weave essentially meter traffic into the study area. There are no planned improvements or mitigations to this condition despite the increase in pedestrian and vehicular volumes. This project needs to mitigate the impacts at the critical weaving section through improvements to either the roadway geometry or operations."
- **Response:** The proposed improvements are not anticipated to substantially impact existing conditions at the Washington Boulevard merge south of the area. To better evaluate this and reduce the influence of run-to-run variability, five new simulation runs were completed for the AM peak hour, and the resulting MOEs were averaged. The updated results are presented in the attached table. Relative to the future baseline scenario, the results indicate an increase in delay of 18.5 seconds per vehicle, an increase in the 50th-percentile queue length of less than 100 feet, and an increase in the 95th-percentile queue length of approximately 300 feet. This is also shown in the updated queue length graphic attached.

Comment #26 | Page/Sheet: General

- **Comment:** "The Build year of 2031 is utilized as the future condition, but there is no planning year analysis that reflects regional background growth or planned COG model changes to land use and transportation infrastructure. Typically, for modifications to interchanges such as those this project is proposing, we would utilize a planning horizon at least 20 years into the future."
- **Response**: For the purpose of this analysis, a five-year build-out horizon was selected to evaluate the operational performance of the completed improvements under projected near-term traffic conditions. Longer-term planning horizons may be considered in subsequent analyses as the design progresses.

Comment #27 | Page/Sheet: General

- **Comment:** "There are no provisions to provide improvements to the sections of memorial drive between the project area and the metro access. Since the metro station is likely the point of access for a large number of visitors, there should be attention and mitigation of conflicts along the pedestrian paths from the metro station to the planned monument."
- **Response:** Safe access from nearby Metrorail stations is provided through the broader pedestrian and bicycle network connecting to the site, including the safety and access improvements shown in the plans. Specific access and safety concerns related to Metrorail access will be further evaluated during subsequent design phases as needed.

Comment #28 | Page/Sheet: General

- **Comment:** "Passive Pedestrian detection will be result in higher pedestrian delay at the signalized locations due to the conflux of shared use paths and likelihood that bicycles will be utilizing the crossings. For example, detection of approaching bicycles prior to waiting in the landing area will be difficult. It is likely that the pedestrian activations will occur every cycle during the peak periods so the simulation tools used should reflect this accurately."

- **Response:** The traffic simulation assumed pedestrian calls during every signal cycle, representing a conservative condition in which pedestrian service is provided every cycle. Passive detection is anticipated to be limited to the crossing waiting area to minimize false calls from passing users. Under this configuration, pedestrians and bicyclists would stop within the detection zone to register a crossing request without needing to physically press a pushbutton, then would wait for the applicable crossing indication before proceeding. The passive detection design will be further refined in subsequent design phases.

Comment #29 | Page/Sheet: General

- **Comment:** "Where conditions are oversaturated or there are major multimodal operational impacts, VISSIM should be utilized to simulate the interactions between the modes as well as sections of the weave areas where queuing is impacting operations. Synchro/SimTraffic is not a good tool to show conflicts between pedestrians and yielding vehicles. The permitted conflicts between pedestrians and yielding vehicles might not be accurately shown with this tool. Synchro should not be used to model weaving condition, hence results further upstream might not be accurately depicted."
- **Response:** Synchro/SimTraffic was selected as an appropriate tool for evaluating the proposed lane configurations, signal operations, delay, and queuing, particularly due to the interactions between closely spaced intersections. The proposed design does not introduce yield-controlled interactions, new weaving conditions, or substantial changes to existing weaving operations. Although the analysis did not identify substantial operational impacts at existing merge locations, NPS recognizes that VISSIM could provide additional insight into merging and weaving operations south of the site, including interactions between the GWMP and Richmond Highway ramps approaching Memorial Avenue and along Washington Boulevard. NPS will consider its use in subsequent analyses as design development progresses.

Comment #30 | Page/Sheet: General

- **Comment:** "There is a substantial amount of bicycle traffic that travels around the existing circle to access the regional trail network (including the Mount Vernon Trail and Washington Boulevard Trail) and Washington DC. The study provides detail on Pedestrian LOS but does not provide a similar metric that accounts for the high volumes of existing and projected bicycle activity, and the high level of mixing of pedestrian and bicycle traffic that occurs throughout the study area. Consider safe and direct bicycle movements in the alignments and design of the sidewalks, crossings, and construction detours in the project area, such as sufficiently wide sidewalks, curb ramps, and crosswalks to accommodate high-volume two-way mixed pedestrian and bicycle traffic, as well as desire lines for bicyclists particularly between the MVT, ANC, Washington Blvd Trail, and Memorial Bridge."
- **Response:** Safe and direct bicycle movements were considered in developing the proposed design and will continue informing later design phases. Bicycle activity alone does not establish the need for separate bicycle LOS and delay calculations, and at this stage, those measures are not necessary to assess the anticipated safety and access benefits relative to existing conditions. These benefits include new north–south access on the west side of Arlington Memorial Bridge and signalized crossings that reduce bicyclists' reliance on finding safe gaps in traffic or drivers yielding the right-of-way. Bicyclist movements, including desire lines and the capacity of shared-use facilities, will continue to inform pathway and crossing geometries as the design is further refined.

Comment #31 | Page/Sheet: General

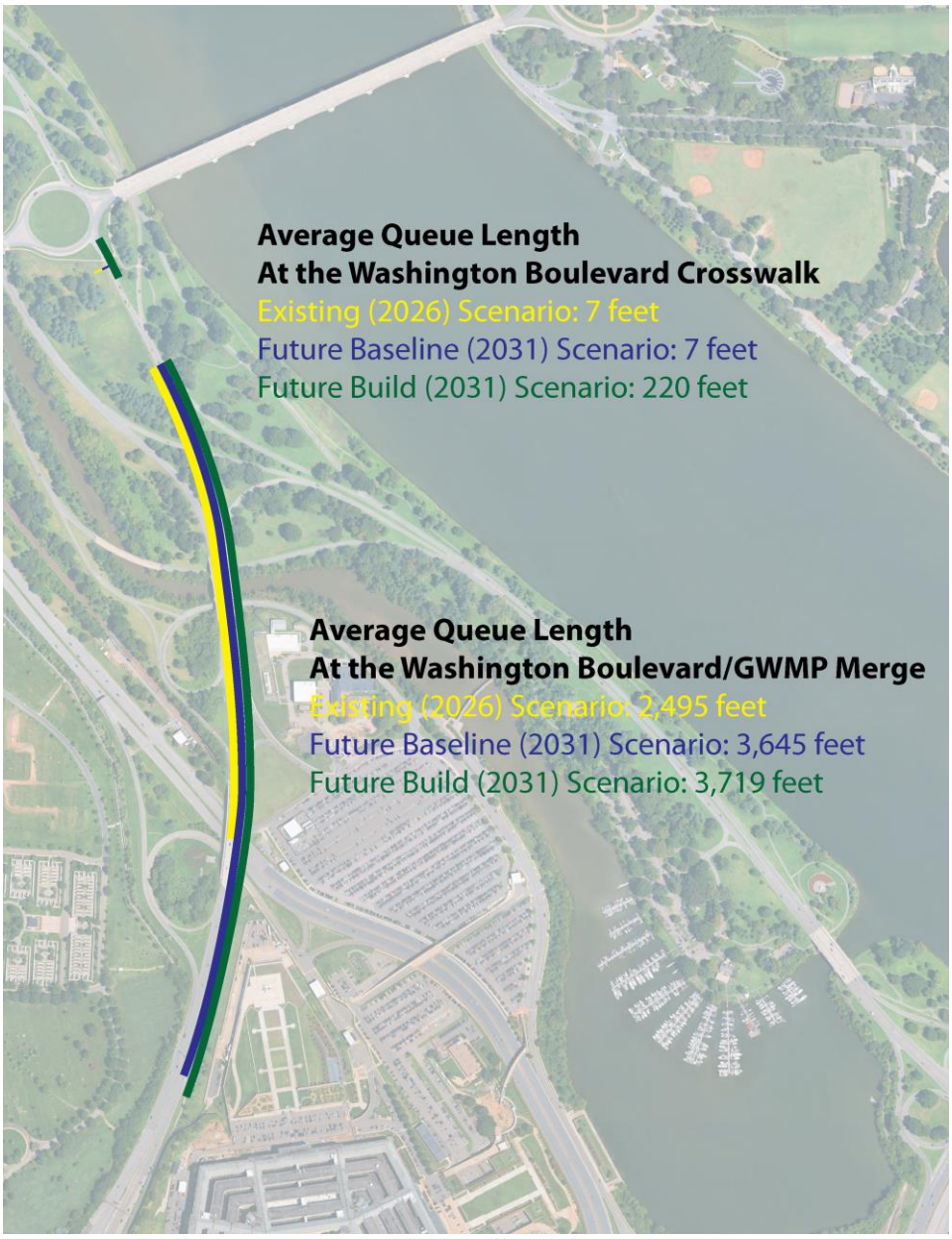
- **Comment:** "Given anticipated volumes of vehicles, pedestrians, and bicyclists during the peak hour, demonstrate how signalized crossing movements will be enforced."
- **Response:** Pedestrian compliance will be encouraged through clearly visible and accessible pedestrian signals, convenient crossing alignments, and signal operations that minimize unnecessary waiting while providing adequate crossing and clearance intervals. These elements will be further refined during future design iterations to ensure that the designated crossings are convenient to use and that the signal indications are clear and predictable, helping increase compliance and reduce the need for enforcement.

October 2026 Update – Average of 5 Simulation Runs

Traffic Operations Analysis Summary, Weekday a.m. Peak Hour

Scenario	Existing	Existing	Existing	Existing	Future Baseline	Future Baseline	Future Baseline	Future Baseline	Future Build	Future Build	Future Build	Future Build
Intersection/Approach	LOS	Delay (s)	Average Queue Length (ft)	95th %ile Queue Length (ft)	LOS	Delay (s)	Average Queue Length (ft)	95th %ile Queue Length (ft)	LOS	Delay (s)	Average Queue Length (ft)	95th %ile Queue Length (ft)
#1a: Washington Blvd at AMC/AMB	A	2.6	-	-	A	2.7	-	-	A	8.2	-	-
AMC EB L/T	A	3.4	6	28	A	3.4	4	23	B	12.7	300	534
Washington Blvd NB T	E	46.0	33	68	E	46.3	36	73				
Washington Blvd NB R	A	1.4	7	61	A	1.4	7	59	A	5.7	200	340
Washington Blvd NB R	A	1.4	2	29	A	1.4	4	41	A	6.2	220	361
#1b: Arlington Blvd at AMC/AMB	A	1.5	-	-	A	1.5	-	-	B	11.9	-	-
AMB WB T	A	4.7	50	73	A	4.7	52	77	A	8.8	81	163
AMB WB R	A	0.5	9	36	A	0.5	10	39	A	9.0	118	193
AMB WB R	A	0.3	2	19	A	0.3	1	11	B	10.8	129	205
AMC NB L/T	A	1.7	3	20	A	1.7	3	17	D	41.0	66	121
#1c: Washington Blvd Crosswalk	A	8.1	-	-	A	8.6	-	-			-	-
Washington Blvd NB T	A	8.0	212	376	A	8.7	211	384				
Washington Blvd NB T	A	8.1	212	374	A	8.6	218	389				
#1d: Arlington Blvd Crosswalk	A	1.9	-	-	A	1.8	-	-	A	0.4	-	-
Arlington Blvd NB T	A	1.9	41	96	A	1.8	38	89	A	0.4	1	8
Arlington Blvd NB T	A	1.9	50	110	A	1.9	52	111	A	0.3	0	4
#1e: Memorial Ave at AMC	A	8.0	-	-	A	8.5	-	-	C	23.7	-	-
Memorial Ave EB R	A	9.9	4	83	B	10.5	0	0	C	28.6	183	694
AMC SB T	D	27.4	0	0	D	27.9	0	0	B	17.1	36	97
AMC SB R	A	0.2	0	0	A	0.2	0	0	A	0.1	30	62
#2: Washington Blvd at GWMP Ramp Merge	F	138.0	-	-	F	194.8	-	-	F	213.3	-	-
Washington Blvd NB T	F	166.8	2,489	4,881	F	236.0	3,627	7,046	F	299.1	3,714	7,344
Washington Blvd NB T	F	211.8	2,495	4,872	F	300.5	3,645	7,013	F	282.1	3,719	7,330
GWMP Ramp NWB R	A	5.5	29	125	A	6.1	40	175	A	7.2	68	196
GWMP Ramp NWB R	A	1.1	13	87	A	1.4	14	84	A	1.1	22	114
#3: Memorial Ave at Richmond Hwy Off-Ramp	A	3.4	-	-	A	3.5	-	-	A	6.1	-	-
Memorial Ave EB T	A	0.0	0	0	A	0.0	0	0	A	0.0	0	0
Memorial Ave WB T	A	2.0	0	0	A	1.9	0	0	A	6.0	0	0
Ramp NB L	C	15.5	55	231	B	14.4	55	206	C	17.1	75	274
Ramp NB R	A	3.0	58	283	A	3.3	61	291	A	5.1	90	368
#4: Memorial Ave at Richmond Hwy On-Ramp	A	0.7	-	-	A	0.7	-	-	A	1.2	-	-
Memorial Ave EB T	A	0.0	0	0	A	0.0	0	0	A	0.0	0	0
Memorial Ave WB T	A	1.9	0	0	A	1.8	0	0	A	3.0	0	0
Memorial Ave WB R	A	0.1	0	6	A	0.1	1	7	A	0.1	0	0
#5: Richmond Hwy Ramp at GWMP Ramp	A	4.4	-	-	A	4.3	-	-	A	4.1	-	-
Richmond Hwy NB T	A	5.4	2	25	A	5.3	0	0	A	5.7	3	42
GWMP Ramp NWB R	A	2.8	0	5	A	2.9	1	10	A	1.5	1	16

October 2026 Update – Average of 5 Simulation Runs
Average Queue Length Diagram



U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

23 April 2026

Dear Secretary Burgum:

In its meeting of 16 April, the Commission of Fine Arts reviewed a concept design submission for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission expressed appreciation for your comments in introducing the proposal at the meeting and approved the submission with the following comments.

The Commission members commented that a proposed monumental arch—a feature characteristic of many national capital cities—would contribute positively to the honorific landscape of Washington, D.C., for many generations. Citing the history of monumental planning for the city to include a large marker in Memorial Circle, they expressed support for the location on this important axis between the Lincoln Memorial and Arlington National Cemetery, and they endorsed the 166-foot height of the arch itself as appropriate for this setting. However, they noted that the great scale and solidity of the proposed structure, while framing axial views between the memorials, may block oblique views within this monumental setting. They therefore recommended creating secondary open archways within the legs of the central arch in order to make it more open; they also suggested creating a more appropriately grand entry sequence into the interior public spaces of the arch.

For the 84-foot-high monumental grouping of a gilded, winged allegorical figure and flanking eagles on a stepped base proposed for the top of the arch, the Commission members suggested removing these from the design, observing that the project would appear more compatible with Washington's monumental context without these elements. Regarding the proposed program of sculpture generally, the Commission members requested more information on the various artworks intended for the project, including those for the arched niches, panels, friezes, keystones, and other areas of the arch. They discouraged the inclusion of lions at the base of the arch, which they noted are not native to the United States, but they encouraged substituting native North American examples of heroic, mighty creatures such animals as bison, horses, or grizzly bears. They also suggested removing the wingless bust of an eagle at the keystone of the central arch.

Regarding the treatment of the site, the Commission members acknowledged the difficulty of providing pedestrian access to the arch, which is proposed to be located within a traffic circle. Rather than constructing a tunnel hundreds of feet long to provide this pedestrian access, they recommended adding a surface crosswalk on the western side of the traffic circle, which would allow a symmetrical composition for the ramps that lead from the street level to the elevated plinth at the base of the arch. They also recommended refining the relationship of the site to the traffic circle itself,

extending the landscape design outward to the greatest extent possible, as well as limiting the use of asphalt pavement to the minimum required for traffic and using a different material, such as stone cobbles, for the restricted areas of the circle instead of applied graphic striping as presented.

In its action of concept approval, the Commission requested that the project be reviewed next as a revised concept submission that responds to these comments. The submission should include: more detailed information should be provided about the intended program of sculptures; an extension of the site model to illustrate the axis of the National Mall eastward from the Lincoln Memorial; the illustration of views to the arch from Arlington House, the Hemicycle, and the Lincoln Memorial; and documentation of the absolute heights of the major monuments within this symbolic landscape as measured from sea level.

The Commission of Fine Arts looks forward to the continued review of this substantial addition to the monumental composition of the national capital. Please coordinate the next submission with the staff which, as always, is available to assist you.

Sincerely,

Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Robin Rode, Les Métalliers Champenois
Josh Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

28 May 2026

Dear Secretary Burgum:

In its meeting of 21 May, the Commission of Fine Arts reviewed a revised concept design proposal for a new monumental arch to be constructed within Memorial Circle on the George Washington Memorial Parkway, on the axis of Arlington Memorial Bridge. The Commission approved the submission as a final proposal for the architectural design with the following comments, requesting further information about the arch's program of sculpture.

The Commission members expressed appreciation for the presentation, which included additional information about the structure's interior, a more extensive site model, rendered views of the proposed arch within the larger monumental context, and the simplification of various decorative features. They cited the history of heroic architecture proposed for this site in the late nineteenth and early twentieth centuries, including several arches and a pair of 166-foot-tall columns; they commented that this proposal builds on the legacy of the McMillan Plan for Washington, D.C., and would extend the symbolic landscape beyond the National Mall. They noted that the city and its narrative of monuments is not static, and this project provides an opportunity for new national stories. In their discussion, the Commission members noted the numerous objections to the project and advised that many of these issues are not part of the Commission's purview. Instead, they characterized the project as beautiful, and they found that the presentation shows the arch would be visually open and would not block views toward the significant landmarks in this context. They concluded that the arch is appropriately scaled to frame and enhance Arlington House as the landmark that terminates the long ceremonial axis from the Lincoln Memorial, and that it would give the historic home of General Robert E. Lee the visual prominence it deserves as the endpoint of the monumental McMillan Plan sequence extending from the Capitol to Arlington National Cemetery.

In their support for the architectural design of the arch as presented, the Commission members resolved to approve this revised concept submission as a final design, with the exception of the sculpture, bas-relief panels, and statuary in the arched niches, which should be submitted when these elements have been designed. Noting the spare character of arch's inner surfaces, they also suggested adding articulation, such as panels, surface relief, or inscriptions to complete the development of the design.

With this action of final approval, the Commission has concluded its review of the architectural components of this project and looks forward to the review of the comprehensive sculptural program.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

cc: Nicolas Leo Charbonneau, Harrison Design
Joshua Fisher, Executive Office of the President
Marcel Acosta, National Capital Planning Commission