



COMMONWEALTH of VIRGINIA

Department of Historic Resources

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June 15, 2026

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

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

Dear Ms. Neresian:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



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

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June 15, 2026

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

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

Dear Ms. Nersesian:

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

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

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

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

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

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

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

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

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

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

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

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

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

Ms. Jennifer T. Nersesian
Initiation of Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle
June 15, 2026
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If you should have any questions or comments regarding any of these matters, please contact me at david.maloney@dc.gov or 202-442-8850 or Andrew Lewis at andrew.lewis@dc.gov or 202-442-8841.

Sincerely,



David Maloney
District of Columbia State Historic Preservation Officer

26-0593

cc: Consulting Parties

Travis Voyles
Vice Chairman

Reid J. Nelson
Executive Director



June 15, 2026

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

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

Dear Ms. Bowron:

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

Section 800.6(a)(1)(iii) of these regulations requires that we notify you as the head of the agency of our decision to participate in consultation. By copy of this letter, we are also notifying Jennifer Nersesian Regional Director, National Capital Region, and Tammy Stidham, Associate Regional Director – Lands and Planning, of this decision.

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

Sincerely,

Reid J. Nelson
Executive Director

Re: Proposed Triumphal Arch - Section 106 consultation meeting

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

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

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

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

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

6. Thank you for providing the viewshed visualizations. It would be helpful to have visualizations from more locations, including from the NHLs. Providing views with leaf-off conditions would also be advisable.
7. TABLE 2: It appears you missed the "Observatory Hill Historic District" National Register listing (NRIS# SG100000479; [Asset Detail](#)). The nomination includes detailed information of views from the campus surrounding the Old Naval Observatory.
8. TABLE 3 - NHL Assessment of Effects:
 - a. Pentagon - Agree with finding. The arch is likely to affect the viewsheds from the Pentagon's two ceremonial entrances on the north and east elevations. Additional visualizations might help confirm if the effects will be adverse.
 - b. Fort Myer NHL District: Agree that the arch will likely be visible from the Fort Myer NHL district and has potential to cause adverse effects. The proposed Arch location is about 5,000 feet southeast of the flagpole at Whipple Field (adjacent to the NHL Fort Myer district) and about 200 feet lower in elevation. While there are intervening trees and the elevation change is significant (approx. 230 feet versus 30 feet), there is still possibility that the upper elements of the arch will be visible.

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

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

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

- c. US Capitol Building– The viewshed simulation provided shows that the arch will be visible, but its distance from the NHL and its location off the main east-west axis along the Mall would minimize its prominence.
- d. Smithsonian Institution Building: Agree that there will be no adverse effect on this NHL.
- e. Georgetown NHL District: As a historic port town, its location on the river and views from the waterfront upriver and downriver are important. Agree that there will be no adverse effect to the NHL because of the distance, intervening landforms and vegetation, and the general visual clutter already present in the viewshed.

f. Old Naval Observatory NHL: The National Register nomination for Observatory Hill district [listed 1/12/2017; NRIS# 100000479] gives insights into the important views from this prominent location: “Written descriptions and images from the mid and late 19th century attest to the park-like character of Observatory Hill, suggesting that it was visited by the public for recreation and for the views it offered.” “the Observatory Hill district possesses a variety of features (Table 1) that give character to the cultural landscape: topography; land use; spatial organization; circulation; vegetation; small-scale features; and views and vistas”

i. Views and Vistas

1. Views to and from the National Mall - upper campus, Period: Old Naval Observatory, Contributing
2. Views to and from Arlington National Cemetery - upper campus, Period: Old Naval Observatory, Contributing
3. View to Georgetown -upper campus - Period: Old Naval Observatory, Contributing
4. View to Lincoln Memorial - lower campus - Period: Hygienic Laboratory/NIH, Contributing

ii. Observatory Hill National Register nomination, Page 7-41 - "Significant views that remain intact include those to the National Mall and West Potomac Park and to Arlington House and Arlington National Cemetery. As two prominent landmarks in the Washington landscape, the Naval Observatory and Arlington House have had a reciprocal relationship since the Observatory's completion in 1844. Views from the Observatory to locations on the National Mall have been present since the nineteenth century, particularly views of the Washington Monument. The intended relationship between the Mall and the Observatory Grounds is evident in the 1902 McMillan Plan, which specifically mentions that the hill had an exceptionally beautiful view and depicted the area as a parkland extension of the Mall. Subsequent development of Observatory Hill and its surrounding area—most notably the addition of the U.S. Institute of Peace (completed in 2010) on the south slope of the hill—has somewhat obstructed views from the historic district. Nonetheless, it retains a visual relationship with the west end of the National Mall and West Potomac Park."

"Views toward Observatory Hill were especially important during the nineteenth century when the Observatory provided local time service, dropping a ball down a pole mounted on the Observatory dome at noon each day. Most artists' depictions of Observatory Hill focused on views from the river or across the river toward the Observatory, highlighting its prominence over the Potomac River and overlooking the city. The hill's visibility diminished as the city grew, but the hill and the dome of the Observatory are still visible from the Potomac and from Arlington."

- "Views and vistas from upper campus have been an important aspect of its landscape since before the construction of the Naval Observatory. These views exist because of the prominence of the hill in Washington's topography. Although some of the views from the hill

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

iii.

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

9. Programmatic Agreement Draft

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

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

Best,
Kathryn

Kathryn G. Smith
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Community Preservation Assistance Program Manager
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NCR Website <https://www.nps.gov/RESSNCR>

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From: Stidham, Tammy <Tammy_Stidham@nps.gov>

Sent: Friday, June 12, 2026 11:18 AM

Subject: Proposed Triumphal Arch - Section 106 consultation meeting

When: Monday, June 15, 2026 1:00 PM-3:00 PM.

Where: Microsoft Teams Meeting

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

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

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

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

- Assessment of Effects
- Draft Programmatic Agreement

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

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

Thank you for your consideration and participation in this consultation.

Tammy Stidham

Associate Regional Director- Lands and Planning

National Park Service

1100 Ohio Drive SW

Washington, DC 20242

voice- (202)619-7474

mobile- (202)438-0028

tammy_stidham@nps.gov

Microsoft Teams meeting

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United States Department of the Interior

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

IN REPLY REFER TO:

June 22, 2026

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

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

Dear Mr. Maloney,

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

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

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

Sincerely,

Jennifer T. Nersesian
Regional Director



June 26, 2026

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

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

Dear Ms. Nersesian:

Thank you again for initiating Section 106 consultation this month on the proposed Triumphal Arch in Memorial Circle, and for holding the first consultation meeting on June 15, 2026. We provided our initial comments verbally at the meeting and in our letter of the same date. Thank you also for your letter of June 22, 2026, seeking clarification of our comments.

Let me first summarize the verbal comments we presented at the June 15 meeting. We were unable to submit those comments in writing due to the quick turn-around in your schedule but will take the opportunity to do so now. As stated in our letter of June 15, the triumphal arch would be the tallest and most visible monument constructed in the District since completion of the Washington Monument. Once complete, it would be the largest monumental arch in the world. In response to a question at the June 15 meeting, your project team characterized the triumphal arch as celebratory rather than memorial, yet its placement in Memorial Circle at the opposite end of Arlington Memorial Bridge from the Lincoln Memorial would make it an inseparable part of a memorial composition in the nation's capital commemorating the reunification of the nation after the Civil War. It would become the most prominent element of that memorial composition. For these reasons alone, the effects of the proposed undertaking on historic properties should be carefully considered in accordance with Section 106 regulations.

Given the international stature that such a triumphal arch would assume, we began our comments by seeking insight from comparable monuments in other cities, notably the Arc de Triomphe in Paris and the 9/11 Memorial in New York City. Both of those famous and heavily visited monuments serve as focal points and destination venues that attract and can accommodate large crowds for public gatherings. In turn, the monuments feed the vitality of street life, businesses, and cultural attractions the urban fabric around them. In contrast, the proposed triumphal arch would be isolated and constrained on a high-volume traffic circle on Columbia Island, which is entirely parkland removed from the urban fabric of Washington. The location does not suggest a likelihood of success for a celebratory monument.

We cited insightful comments of those testifying recently to the National Capital Planning Commission, including veterans and family members of those buried at Arlington National Cemetery, about locating the arch at its entrance. Much eloquent testimony was given on how a 250-foot-high triumphal monument would be divisive and not healing. It would also severely damage an exceptional cultural landscape and one of the most important symbolic places in the nation.

Given the substantial adverse effects at the Memorial Circle location, we recommended that the National Park Service consider an alternate location for the arch, specifically at the newly created oval marking the arrival of South Capitol Street at the Anacostia River and its shift in direction to cross the new Frederick Douglass Bridge. This location offers multiple advantages. It is on direct axis with the Capitol and would mark the entrance to the original city on one of the four cardinal axes emanating from the Capitol dome. The 166-foot height of its main block would be more in scale with the 288-foot height of the Capitol dome. It would establish a direct visual interrelationship with the Capitol dome in the same manner as the other reciprocal vistas that characterize the L'Enfant city. It marks the intersection with Potomac Avenue, creating additional designed views. Its elongated shape would better accommodate a crowd that could arrive at multiple crossings controlled by traffic lights. It sits between Nationals Park and Audi Field, whose combined capacity is 60,000 seats. It would create an energizing focal point for a still-emerging neighborhood, suitable for a celebratory crowd. With the new RFK stadium at 70,000 seats and other historic recreational facilities a short distance away along the Anacostia River, it could become a symbol of sports triumph and an icon for a hoped-for DC Olympic Games. And importantly, it would enhance the historic L'Enfant Plan and the city's monumental landscape rather than detracting from it.

We appreciate your informing us about the numerous public comments you have received. We are particularly interested in any comments from DC residents and organizations so that we can better fulfill our responsibility to reflect the interests of the District of Columbia and its citizens. We are also interested in how you will be making comments available to consulting parties and taking them into account. We look forward to discussing this at a future consulting parties meeting.

As required by 36 CFR 800.3(c)(3), consultation is carried out in a manner commensurate with the nature of the undertaking and its effects on historic properties. The unprecedented nature of this proposal and the extraordinary level of public interest clearly require full consideration of alternatives that could avoid, minimize, or mitigate adverse effects. The potential for such effects on National Historic Landmarks elevates the requirement for planning to minimize harm. Exclusion of alternatives that may involve site relocation or diminution of the structure is not consistent with these requirements.

Our recommended alternative site is not a mitigation measure but a way to avoid adverse effects, which is a preferred outcome in Section 106 review. We would like to hear the views of other parties on it and any other suggestions. As part of the consultation process, we would like to know if NPS has considered other ways to avoid the adverse effects associated with this undertaking, and if so, what they were and why they were rejected. We have made no decision on whether there are measures that could adequately minimize or mitigate the adverse effects of the proposal and cannot make such a decision without first hearing and considering the views and suggestions of routinely qualified consulting parties who have expressed an interest in participating as such. These parties have so far been denied the opportunity to participate. We look forward to further consultation with you and all interested consulting parties as set forth in the regulations.

Sincerely,



David Maloney
District of Columbia State Historic Preservation Officer

26-0593

cc: Consulting Parties

From: Maloney, David (OP) <david.maloney@dc.gov>
Sent: Thursday, July 2, 2026 12:37 PM
To: Stidham, Tammy <tammy_stidham@nps.gov>
Subject: Clarification for the record

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

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

Thanks,

David



David Maloney (he/him/his)

State Historic Preservation Officer • DC Office of Planning

899 North Capitol Street NE, Suite 7100 • Washington, DC 20002

202-442-8850

david.maloney@dc.gov

planning.dc.gov

Telework Day: Tuesdays. I can still be reached via email and phone during these days.

[Sign up here](#) for OP's newsletter and announcements