National Capital Planning Commission

**NCPC File No. 8778**

# TRIUMPHAL ARCH

George Washington Memorial Parkway
Washington, DC

Finding of No Significant Impact

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and the National Capital Planning Commission's (NCPC) NEPA Regulations, I have evaluated the Triumphal Arch Environmental Assessment (EA), prepared by the National Park Service (NPS), dated October 2026, and Finding of No Significant Impact (FONSI), prepared by NPS and dated October 9, 2026. The EA is incorporated into this FONSI by reference based on the Commission Action on NCPC Project No. 8778 – Monumental Arch - dated November 5, 2026. Based on the foregoing, I have determined the project will not have a significant impact on the quality of the human environment and therefore an Environmental Impact Statement (EIS) is not required.

## PURPOSE AND NEED

As described in the NPS EA, the purpose of the proposed action 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.

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. Installation of an appropriate structure presents an opportunity to advance that directive.

## PROPOSED ACTION

### Selected Action

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

**No Action Alternative**

Under the no action alternative (Alternative A), no arch would be built at Memorial Circle, in celebration of 250 years of American independence.

## OTHER ALTERNATIVES EVALUATED

The NPS considered several other alternatives, or alternative elements, during the NEPA process. In particular, smaller arches were dismissed from detailed analysis because they would have had greater impacts on the cultural landscapes, specifically the views between the Lincoln Memorial and Arlington National Cemetery. Other components, such as pedestrian tunnels or elevated walkways, were similarly dismissed. A discussion of alternatives or alternative elements considered but dismissed is included in Appendix A of the EA.

## STANDARD FOR EVALUATION

Under NEPA, an EA is sufficient, and an EIS need not be prepared if the EA supports the finding that the federal action will not significantly affect the quality of the human or natural environment. The NEPA documents, including the EA and FONSI prepared by NPS, were prepared in accordance with this standard. As described below, no significant impacts were identified that will require analysis in an EIS.

## POTENTIAL IMPACTS

A description of all potential environmental effects associated with the selected action and no action alternative is included in the EA, incorporated by reference herein. The EA evaluated the significance of the selected action, identified as the proposed action in the EA, by analyzing the potentially affected environment and the degree of the effects of the selected action. Significance is determined solely in relation to reasonably foreseeable adverse effects. The degree of effect is considered by evaluating both short-and-long term effects, both beneficial effects and adverse effects, effects on public health and safety, economic effects and effects on the quality of life of the American People.

The EA discloses the reasonably foreseeable effects of the selected action, including the combined effects of the selected action with those of past, ongoing, and anticipated future actions on the parkway's cultural resources and on visitor access and experience. While other parkway resources may experience some effects, those effects are minimal and were determined not to warrant detailed analysis in the EA. Accordingly, these resources are not discussed further here, as the anticipated effects are so minor that they have no potential to reach a level of significance. For a detailed description of impact topics considered but dismissed, see Appendix A of the EA.

Potentially Affected Environment

A more detailed description of the potentially affected environment is included in the EA under the subheading "Affected Environment and Environmental Consequences" for each resource carried forward for analysis. The initial concepts for the Columbia Island plaza, now Memorial Circle, evolved over many years. Early plans envisioned a grand, highly symbolic landscape that

integrated Arlington Memorial Bridge with a formal traffic ellipse on Columbia Island. The earliest designs proposed that the bridge roadway would meet at a large elliptical plaza from which crossarms extended north and south. Westward, the bridge axis would continue toward Arlington National Cemetery as a formal, hedge lined grand avenue culminating in pylons, gates, and a hemicycle, reinforcing the ceremonial approach. A focal point of the ellipse was to be two monumental 166-foot columns, each topped with a winged figure (representing the North and South) to symbolize national reunion after the Civil War. The ellipse would be framed by a granite balustrade, joining the pylons located at the bridge ends. At the termini of the north and south crossarms, small circular Greek temples were planned, each positioned within a circular roadway that connected to major regional routes, Lee Highway to the north and Mount Vernon Memorial Highway to the south. The column concept was not pursued further. Design revisions eliminated the proposed cross axis, reducing the scheme to a single traffic circle. Kendall's 1932–33 submissions replaced the earlier monumental columns with two basin framed pavilions housing 18-foot gilded bronze figures of Liberty and Unity, retaining an emphasis on axial formality and tree plantings but at a substantially reduced scale. Ultimately, none of the planned monuments or statutes were placed within or near Memorial Circle.

Today, Memorial Circle functions as a major traffic rotary and heavily used multimodal hub, connecting Arlington Memorial Bridge, the George Washington Memorial Parkway, U.S. Route 50/Arlington Boulevard, and access roads to Arlington National Cemetery. The area accommodates consistently high levels of vehicular traffic, particularly during weekday commuting periods, creating a busy and complex traffic circulation for all users, while pedestrians and cyclists move through key connections such as Memorial Bridge, the Mount Vernon Trail, and access points to Arlington National Cemetery and the Metrorail station. These high traffic volumes also generate consistently elevated ambient noise levels throughout Memorial Circle, with continuous roadway traffic and frequent aircraft overflights contributing noise to the soundscape. Visitation is driven largely by commuters, recreational trail users, and visitors traveling to nearby destinations rather than to the Circle itself. Most pedestrians and cyclists pass through the area via the Mount Vernon Trail, Memorial Bridge, or access from the Cemetery and Metrorail station. Although the Circle offers notable views of the Lincoln Memorial, Arlington House, and the Potomac River, the overall experience is dominated by transportation activity and is typically brief. For more information about traffic and circulation, visitor experience and noise at Memorial Circle, see Sections 3.7, 3.8 and 3.9 of the EA and Appendix B.

Memorial Circle sits within a broader project area that is defined by the historic axial views that connect the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, and Arlington House, views intentionally established to create a unified ceremonial landscape spanning the Potomac River. These reciprocal sightlines, still experienced today from both the Lincoln Memorial and Arlington House, are central to the historic character and visual integrity of the area. The area surrounding these views includes a concentration of cultural landscapes and historic districts that converge at or near Memorial Circle, including the George Washington Memorial Parkway, the Memorial Avenue Corridor, Lady Bird Johnson Park, the Lincoln Memorial cultural landscape, Arlington National Cemetery, and the Arlington House Cultural Landscape. Finally, although the broader project area contains a number of recorded archeological resources, only one known site lies within or near the anticipated limits of disturbance at Memorial Circle, and the Circle itself sits atop approximately fill that substantially limits the likelihood of intact archeological deposits. For specific information about the historic views, cultural landscapes and

historic districts, as well as other historic resources affected and archeology, see Sections 3.2, 3.3, 3.4 and 3.5 of the EA and Appendix C.

The project area supports typical urban parkway resources, including wildlife species, maintained vegetation, and landscaped soils shaped by decades of transportation use and routine management. Natural ecological functions are limited due to the highly engineered setting. Among these resources, groundwater and surface water are the most relevant to the project. Groundwater occurs in shallow, perched conditions influenced by the nearby Potomac River, generally about 15 feet below the surface, and fluctuates seasonally and during major storm or tidal events. Surface water within Memorial Circle is entirely engineered: rainfall drains across paved and landscaped areas into storm inlets and is conveyed toward the Potomac River, with no natural surface water features present. As a result, hydrologic conditions in the area are dominated by stormwater runoff, engineered drainage, and river stage fluctuations. For additional information on effects to the park's natural resources, see Sections 3.6 and 3.10 of the EA and Appendix A.

Short and Long-term Beneficial and Adverse Effects

*Cultural Resources – Historic Views*

The Triumphal Arch would alter several historic views throughout the Memorial Avenue corridor, most notably the longstanding axial alignment between Arlington House and the Lincoln Memorial. The Arch would occupy the center of this designed vista, obstructing the reciprocal view and impacting the clarity of this sightline. Partial obstructions would occur in views between the Arlington Hemicycle and the Lincoln Memorial and in east–west and north–south views across Memorial Circle, where the Arch would reduce openness and introduce a new visual focal element. Although these changes represent adverse effects on the integrity of the corridor's historic viewshed, the defining spatial organization of the landscape remains discernible, and the Lincoln Memorial, Arlington House, and other major landmarks would remain visible in broader panoramic views. Because the project does not eliminate historic visual relationships but modifies them in ways that remain understandable within the designed landscape, these adverse changes do not reach the threshold of significance and would not impede visitors' ability to perceive or interpret the historic setting.

In addition, early design concepts for Memorial Circle envisioned additional architectural features, including two large commemorative columns, that would have introduced prominent vertical elements into the same views. These unbuilt components demonstrate that substantial structural features were once anticipated as part of the Circle's monumental composition and would themselves have altered or partially interrupted the historic sightlines. In this context, the Arch's modification of views represents a shift consistent with the corridor's longstanding design evolution, and the presence of a vertical form is not wholly incompatible with the area's historic planning framework.

*Cultural Resources – Cultural Landscapes and Historic Districts*

The Triumphal Arch would affect all the cultural landscapes within the project area by introducing a prominent vertical structure into settings historically defined by low horizons and open spatial organization. Within the George Washington Memorial Parkway cultural landscape, the Arch

would interrupt long, horizontally oriented views that emphasize natural scenery and modestly scaled built features, becoming a dominant visual element along a route intentionally designed to foreground the Potomac River corridor. In the Memorial Avenue Corridor, the Arch would modify the formal axial organization and symmetrical plantings that define the procession between Arlington National Cemetery and the monumental core, altering views toward the Lincoln Memorial and reshaping the historic experience of movement along the axis. Similar changes would occur in Lady Bird Johnson Park, where the Arch would alter the naturalistic river landscape intended to contrast with the more formal monumental core, and in views from the Lincoln Memorial, where the Arch would intrude into long established cross-river vistas toward Arlington House. From Arlington National Cemetery and from Arlington House, the Arch would appear as a prominent center feature that interrupts the historic axial view between the mansion and the Lincoln Memorial, as well as the view from the Cemetery's historic orientation toward Washington, DC.

These effects must be evaluated in light of Memorial Circle's own design history. Early planning concepts for Columbia Island envisioned a highly symbolic plaza with two monumental 166-foot columns, each topped with a winged figure, establishing a strong vertical expression at the heart of the Circle. Although this project was not completed at the time, its scale and intent demonstrate that a tall architectural feature at this location is consistent with early designs. Over the years, the Circle's design underwent multiple revisions, each reviewed by the U.S. Commission of Fine Arts, as the designs were gradually scaled back, simplified, and reshaped. By the early 1930s, the Circle had taken on its current form as a single traffic rotary with modest basins and plantings. Later planning documents have likewise recognized Memorial Circle as an appropriate location for architectural features. Because the site has historically accommodated shifting design intentions and evolving landscape concepts, the introduction of a new architectural feature, while taller than the originally proposed columns, is consistent with the Circle's planning evolution and can be understood as aligning with its later role as a formalized node capable of supporting architectural expression.

While the Arch would introduce permanent adverse effects by altering view composition, diminishing openness, and changing the visual hierarchy among contributing features, the defining characteristics of the cultural landscapes would remain discernible. The primary spatial organization of the Parkway, the Memorial Avenue Corridor, and the cross-river alignment would continue to be understood; contributing features such as the Lincoln Memorial, Arlington House, Arlington National Cemetery, the Potomac River, and the surrounding parklands would remain visible in broader panoramas; and historic visual relationships, though modified, would generally not be eliminated. The contributing elements of these landscapes retain their experiential and interpretive coherence, even with the introduction of a new focal element.

Views from the Arch itself could strengthen these visual relationships by offering new elevated perspectives that reveal the continued alignment of major landmarks within the broader cultural landscape. For all of these reasons, the impacts, though adverse and in some cases substantial, would not rise to the level of significance, as they do not eliminate visitors' overall ability to perceive, understand, or interpret the historic setting.

In addition to the long-term impacts associated with placement of the Arch, installation of utilities and Arch-related construction activities would introduce short-term adverse effects on cultural

landscapes and historic districts. These construction activities would be temporary and, for utilities, limited in spatial extent at any given time; therefore, their effects would not rise to the level of significant impacts. Installation of new utilities on or within historic bridges would occur alongside existing utility lines and would not alter the character-defining features or qualities that convey the bridges' historic significance. Subsurface placement would leave the bridges' appearance unchanged once surfaces are restored, and any exterior additions would be minor and incremental. These changes would not diminish the bridges' integrity of design, materials, workmanship, or setting, nor would they measurably affect their contribution to the surrounding cultural landscape. Accordingly, these effects would not constitute a significant impact.

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), NPS consulted with the District of Columbia State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP) and other Consulting Parties regarding the proposed project. On June 10, 2026, NCPC notified NPS in writing that, in accordance with the relevant regulations, NCPC was designating NPS as the lead federal agency for purposes of compliance with the Section 106 process of the NHPA. NPS prepared a draft Assessment of Effects and Memorandum of Agreement and held 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.

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 NHPA.

*Cultural Resources – Archeology*

Construction of the Arch and associated landscaping, grading, stormwater management features, and utilities would involve both permanent and temporary ground disturbance within Memorial Circle and along Memorial Avenue. This work includes installation of new potable water, sanitary sewer, electric, and telecommunications utility lines, which could potentially intersect with Site 44AX0028 (Alexandria Canal), a historically documented feature that crosses what is now Memorial Avenue. Although much of the canal has been destroyed, limited subsurface remnants may remain within the project area. Additional construction activities within Memorial Circle could also encounter archeological materials if any survive beneath the approximately 14-foot fill cap that was placed during earlier twentieth century landscape modification.

Despite these possibilities, the potential for intact archeological resources within the area of disturbance is considered low due to extensive prior ground alteration associated with the canal's historic destruction, twentieth century roadway construction, and repeated fill placement over time. Any remaining deposits, if present, would likely be highly disturbed and lack contextual integrity. The project incorporates mitigation measures to ensure that, in the event archeological materials are present, they would be identified and appropriately treated. These measures include

developing an archeological work plan in consultation with the relevant State Historic Preservation Officers and potentially conducting a Phase IB subsurface investigation, if necessary, including geoarchaeological analysis, to determine the presence or absence of archeological resources before construction proceeds.

*Water Resources*

Although the proposed action would alter infiltration by replacing the central lawn with an impermeable surface, any required dewatering or subsurface construction would follow standard geotechnical practices and adhere to District and federal requirements, preventing uncontrolled groundwater effects. The shallow groundwater system beneath Memorial Circle is already primarily governed by natural Potomac River fluctuations, clay lenses, and discontinuous fill layers, and these processes would continue independent of the project. While perched groundwater could locally mound or become pressurized, conditions typical of Potomac terrace soils, such effects can be effectively managed through routine monitoring and maintenance. Because the project does not introduce long-term hydrologic modifications to groundwater, these changes would not substantially alter groundwater availability, flow patterns, or aquifer conditions, and therefore would not rise to the level of significant impacts.

Surface water behavior within Memorial Circle is fully controlled by engineered stormwater systems and the adjacent Potomac River's tidal regime. Although the project would increase impervious area and therefore runoff volumes, stormwater would continue to be captured and conveyed through existing (and if necessary, upgraded) drainage infrastructure designed to handle roadway discharge. The site lies outside the 100- and 500-year floodplains, and the project would not alter riverine hydrology, tidal patterns, or flood risk. With appropriate stormwater design and adherence to District and federal requirements, runoff increases would not result in changes to Potomac River conditions, sedimentation, or long-term reductions in water quality. Because drainage would remain fully contained within engineered systems, no significant surface-water impacts are anticipated.

*Traffic and Circulation*

During the two– to three–year construction period, cyclists and pedestrians would encounter temporary detours that, in some cases, lengthen travel routes. For much of this period, users approaching from the south side of Memorial Circle would be rerouted to the north side, increasing travel times and reducing the directness of access to the Mount Vernon Trail, the Metrorail station, and Arlington National Cemetery. Although all detours would remain accessible, users could still face navigational challenges; these would be mitigated through clear signage and active wayfinding. Pedestrians would also experience closer proximity to construction equipment, noise, temporary barriers, and occasional overlap with regional infrastructure projects, which could compress foot traffic into fewer open corridors and create variability in walking times. Throughout construction, NPS would maintain safe conditions through established Maintenance of Traffic (MOT) measures. At the conclusion of construction, all temporary detours and closures would be removed, and bicycle and pedestrian circulation would return to similar patterns as was present before construction, with small variations. Because these effects would be temporary, localized to the immediate project area, fully mitigated through established MOT practices, similar in scale to routine construction disruptions in the region, and would continue to allow access to the area

through detours without causing traffic or circulation delays, they would not rise to the level of significant impacts.

Even with the projected increase in visitors to Memorial Circle, the proposed traffic and circulation improvements would provide substantial long-term safety and mobility benefits for pedestrians and bicyclists. These improvements would also maintain stable traffic operations, and long-term traffic delays are not anticipated once the final circulation pattern is implemented. New fully signalized crossings, simplified controls, and expanded refuge islands would reduce conflict points and create more intuitive travel paths. Improved sight distance and design features such as raised crossings, curb extensions, and coordinated wayfinding would further enhance driver awareness and support safe, orderly movement. Together, these elements would result in a beneficial effect on nonmotorized circulation and safety and no significant adverse impacts.

Similarly, the proposed action would not result in significant impacts on parking availability at Arlington National Cemetery. Because existing personal-vehicle parking facilities typically operate well below capacity and are anticipated to accommodate additional personal-vehicle demand, there would be no significant adverse impacts on personal-vehicle parking availability at Arlington National Cemetery. Drop-off areas for buses and motorcoaches would continue to operate at or near capacity; however, impacts from the proposed action would not be significant because the number of additional buses associated with the project is not expected to increase substantially, existing overflow parking along Memorial Avenue would continue to be available, and, should demand increase in the future, additional designated bus or motorcoach drop off are could be considered in the future to improve circulation.

*Visitor Experience*

Under the selected action, visitors would experience temporary adverse effects during construction. Detours, lane closures, trail adjustments, and construction activity would interrupt normal travel patterns and increase noise and visual intrusions. These effects would be limited to the two- to three-year construction period and carefully managed through established measures to maintain safe pedestrian and cyclist movement while keeping traffic flowing. Because the disruptions would be temporary, localized to the roads, trails and sidewalks near Memorial Circle, and similar in scale to routine construction activity commonly experienced in the region, these construction impacts are not considered significant adverse impacts to the visitor experience.

Once complete, the project would create a new visitor destination at Memorial Circle, a beneficial impact to visitors. Visitors approaching from the National Mall or from Arlington National Cemetery would experience prominent views of the Arch as they arrive, and upgrades, including improved signaling, raised crosswalks, enhanced wayfinding, and bicycle racks, would substantially improve safety and navigation compared to existing conditions. The Arch itself would introduce a new interpretive opportunity, offering interior exhibits, ADA accessible visitor amenities, and elevated views toward major landmarks.

The Arch would also introduce permanent changes to some long-familiar views, including interruption of the historic axial sightline between the Lincoln Memorial and Arlington House. Some visitors may perceive this as an adverse change to the visual character of the landscape. However, these changes would not constitute significant adverse impact to visitor experience

because many established views would remain available and the Arch would create new elevated and framed views that enhance the visual experience of the area.

Overall, although the proposed action would introduce temporary construction impacts and permanent modifications to certain views, these effects would not result in significant adverse impacts as described above. In the long term, the project would improve visitor safety, accessibility, interpretive opportunities, and amenities at Memorial Circle.

*Noise*

Although construction of the Arch would generate intermittent high-intensity noise, particularly during pile-driving activities, these effects would be temporary, localized, and effectively minimized through mandatory use of noise blankets. Parts of Arlington National Cemetery are considered a setting where serenity and quiet are essential to its purpose. Modeling demonstrates that the required noise blanket would reduce peak sound levels, including at sensitive receptor locations within Arlington National Cemetery, keeping nearly all areas, including the Tomb of the Unknown Soldier and primary ceremonial spaces, below 57 dBA. Because pile driving is limited in duration and would occur only during a discrete phase of construction, higher noise levels would not persist throughout the overall construction period, and subsequent work would produce substantially lower sound levels. Some sound from construction activities would be audible across the Potomac River near the Lincoln Memorial and adjacent recreational areas; however, the combination of distance, existing urban ambient noise, and the temporary nature of the work would prevent disruption or permanent changes to the soundscape. With noise blankets in place, no substantial noise propagation toward the Lincoln Memorial and other commemorative landscapes across the Potomac is expected. Nighttime activities would be more perceptible due to lower background noise, but these effects would remain transient and would cease upon project completion.

In summary, because construction noise would be intermittent, confined to active work areas, and substantially reduced through the required noise blankets that minimize the loudest activities, the proposed action would not significantly affect the acoustic environment. Construction noise would not significantly degrade the ceremonial or contemplative qualities of Arlington National Cemetery or other commemorative locations within the George Washington Memorial Parkway, nor would it significantly alter the acoustic character of commemorative areas across the Potomac River. As a result, the temporary nature of the noise, combined with effective attenuation measures and already elevated ambient sound levels, means that construction noise would not rise to the level of significance.

*Night Skies*

Night skies from Memorial Circle are characterized by an urban night-sky environment shaped by regional skyglow, monument lighting, roadway illumination, and aviation activity. The proposed lighting on the Arch, including illumination of the Circle, the Arch walls, and the FAA-required lighting on the roof, would introduce a new prominent vertical light source and increase localized skyglow; however, these effects would occur within an already highly luminous setting with substantial existing artificial light. Fully shielded fixtures around Memorial Circle and tapered illumination on the Arch’s surfaces would limit light spill and reduce unnecessary brightness.

Although the statuary lighting and torch would be visible from portions of the surrounding landscape, the incremental increase in brightness would not meaningfully alter nighttime functioning. Because the surrounding area already experiences substantial ambient lighting, and because the project incorporates lighting controls that minimize skyglow and off-site glare to the extent possible and are consistent with existing lighting on nearby memorials and monuments, the anticipated changes would not rise to the level of significant impacts on night-sky quality or the nighttime experience of the broader ceremonial landscape.

*Effects on Public Health and Safety*

NPS assessed the significance of the proposed action's effects on public health and safety. The proposed action would not result in significant adverse effects on public health and safety. Construction would be limited to Memorial Circle and adjacent staging areas, requiring temporary closures, detours, and Maintenance of Traffic measures. These short-term conditions are typical of major civil work and would be carefully managed through peak-hour avoidance, real-time queue monitoring, signal timing adjustments, and continuous ADA-compliant pedestrian routes. Thus, none of the short-term construction impacts are expected to be a significant impact on public health or safety. As described in Appendix A of the EA, associated equipment use and vehicle trips would not significantly affect regional air quality, with emissions remaining well below applicable thresholds. During construction, certain travel routes for pedestrians, cyclists, and motorists may be temporarily rerouted or restricted to maintain a safe environment, with all changes clearly marked and managed under NPS safety protocols.

Even with the anticipated increase in visitors to Memorial Circle, improvements to circulation and safety at Memorial Circle, including signalized crosswalks, reduced conflict points among travel modes, and upgraded pedestrian and bicycle facilities, would provide long-term safety benefits without disrupting traffic flow. Thus, the proposed action would result in safety improvements for pedestrians and cyclists.

Although Memorial Circle is used intermittently (approximately five times per year) for Park Police medevac operations, the Park Police have identified other nearby areas that can safely accommodate helicopter landings when operational needs require. While Memorial Circle offers a convenient location, the availability of these alternative sites ensures that emergency response functions would continue without meaningful disruption. As a result, removing the Circle from medevac use would not result in significant changes to public safety or diminish overall emergency response capability.

Because of Memorial Circle's proximity to Ronald Regan Washington National Airport, NPS has considered whether the proposed project would adversely affect aviation safety. NPS does not possess specialized expertise in aviation safety and therefore relies on the expertise of the Federal Aviation Administration (FAA). The FAA completed a feasibility study and concluded that the proposed project would have no significant adverse effect on airspace or on visual or instrument procedures at Ronald Reagan Washington National Airport and would not have any effect on airport facilities or radio/visual navigational and landing aids. The FAA subsequently completed an aeronautical study for the Arch and concluded, "the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities," and that the Arch would not be a hazard to air navigation (Federal

Aviation Administration. 2026. *Determination of no hazard to air navigation*: 2026-AEA-8628-OE [Report]. Obstruction Evaluation Group. Available at: *https://oeaaa.faa.gov*). The FAA feasibility study and aeronautical study determined that the Arch would require an obstruction light. The FAA approved a natural-gas-powered flame on the torch atop the Arch's tallest statuary. The "eternal flame" will serve as the Arch's required obstruction light (Federal Aviation Administration, 2026). NPS will implement any required mitigation measures and will address additional FAA compliance steps as the project progresses through subsequent design and implementation phases.

The proposed action does not involve hazardous materials or other threats to human health. While construction would cause temporary, localized disruptions, it would not introduce significant adverse health or safety risks. Instead, the project would enhance safety for pedestrians and bicyclists moving through Memorial Circle.

*Economic Effects*

NPS assessed the significance of any economic effects. NPS considered economic impacts but dismissed them from detailed analysis, as explained in Appendix A of the EA. The socioeconomic environment around Memorial Circle includes a mix of local, regional, and national businesses, government facilities, residences, and tourism destinations; however, Memorial Circle itself is not a visitor draw and functions primarily as a transportation space rather than an economic destination. Construction of the proposed Arch would introduce temporary changes to travel patterns for pedestrians, cyclists, and motorists, creating limited short-term inconvenience but no meaningful effects on the regional economy, tourism sector, or local employment.

The proposed Arch would create a new visitor experience along the corridor of national remembrance. Although visitation could increase substantially once the Arch opens, visitors to Washington, DC typically visit multiple monuments, museums, and attractions during a single trip. As a result, while the Arch would contribute incrementally to the collective economic activity generated by the region's cultural destinations, it would not constitute a major economic driver on its own. Construction would also produce a short-term need for workers and minor increases in local business activity, but these effects would be small relative to the size of the surrounding economy and would be below the level of detection. For these reasons, there would be no significant adverse economic effects from the project.

*Effects on the Quality of Life of the American People*

NPS assessed the significance of the proposed action's effects on the quality of life of the American people. As described in the EA, the proposed action would affect visitor access and experience at Memorial Circle, resulting in both adverse and beneficial impacts. In the short term, construction activity, limited access, and temporary detours would create adverse effects for pedestrians, cyclists, and motorists moving through the area. Over the long term, however, the completed Triumphal Arch and associated improvements would reopen to the public and enhance opportunities for meaningful engagement with the historic ceremonial landscape connecting Washington, D.C. and Arlington. The improvements to traffic and circulation under the proposed action would benefit the American people by enhancing circulation, safety, and the overall ease of

travel through this prominent gateway, specifically pedestrians and cyclists traveling between the National Mall and Arlington National Cemetery.

Although some historic views would be adversely affected, the proposed action would not reduce educational opportunities or significantly adversely impact public understanding of the surrounding park areas. Rather, the Triumphal Arch would provide new opportunities for interpretation, orientation, and reflection within a nationally significant setting. Over time, the Arch would directly benefit the American people by creating a new public space for viewing, learning, and appreciating the historic Potomac River corridor and its monumental alignments. The Arch's visitor facilities, including its exhibit space, mezzanine level, and public amenities described in the EA, would offer an improved and accessible environment for experiencing the area's history and landscape.

Collectively, the Arch would reinforce shared civic identity, strengthen public appreciation for this nationally important setting, and contribute positively to the quality of life of the American people. The proposed action would not restrict the public's ability to consume, purchase, or use products from public lands. It would also have no impact on public services, traditional land and water use practices, or the cultural heritage of Native American communities. Additionally, the selected alternative would not affect passive recreational use of ecosystems.

Rationale for the Decision

The proposed action to construct a Triumphal Arch at Memorial Circle, as part of the George Washington Memorial Parkway, in Washington, DC is the selected action. The EA evaluated two alternatives: a no action alternative and proposed action, which is the selected action. In addition, NPS considered several other alternatives, or alternative components, for the arch. These were dismissed due to the potential for greater impacts. The no action alternative was not selected because it does not meet the project's purpose and need, as it would not 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; nor does it support Executive Order 14252.

In summary, the selected action best meets the project's purpose and need 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, in celebration of 250 years of American independence.

**NCPC DETERMINATION AND FINDING**

Based on the information contained in the EA and FONSI prepared by NPS, described above, adopted by NCPC in the Commission Action on NCPC Project No. 8778 on November 5, 2026, the selected action does not constitute a major federal action meeting the criteria that normally requires preparation of an EIS. The selected alternative will not have a significant effect on the

human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Diane Sullivan
Diane Sullivan
Acting Executive Director

11/05/26
Date