



September 16, 2026

Ms. Tammy Stidham
Associate Regional Director – Lands and Planning
National Park Service
National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

RE: DC SHPO Comments on the Assessment of Effects Report for the Triumphal Arch Project

Dear Ms. Stidham:

Thank you for providing the District of Columbia State Historic Preservation Officer (DC SHPO) with a revised Assessment of Effects (AOE) Report and related documents for the proposed Triumphal Arch Project and for hosting a second consulting parties meeting on September 9, 2026. We also appreciated receiving electronic copies of the more than 100,000 public comments we had requested from the National Park Service (NPS) on several prior occasions. Based upon our review of this additional information and our participation in the recent meeting, we are writing to provide additional comments regarding the effects of the Triumphal Arch on historic properties in accordance with Section 106 of the National Historic Preservation Act.

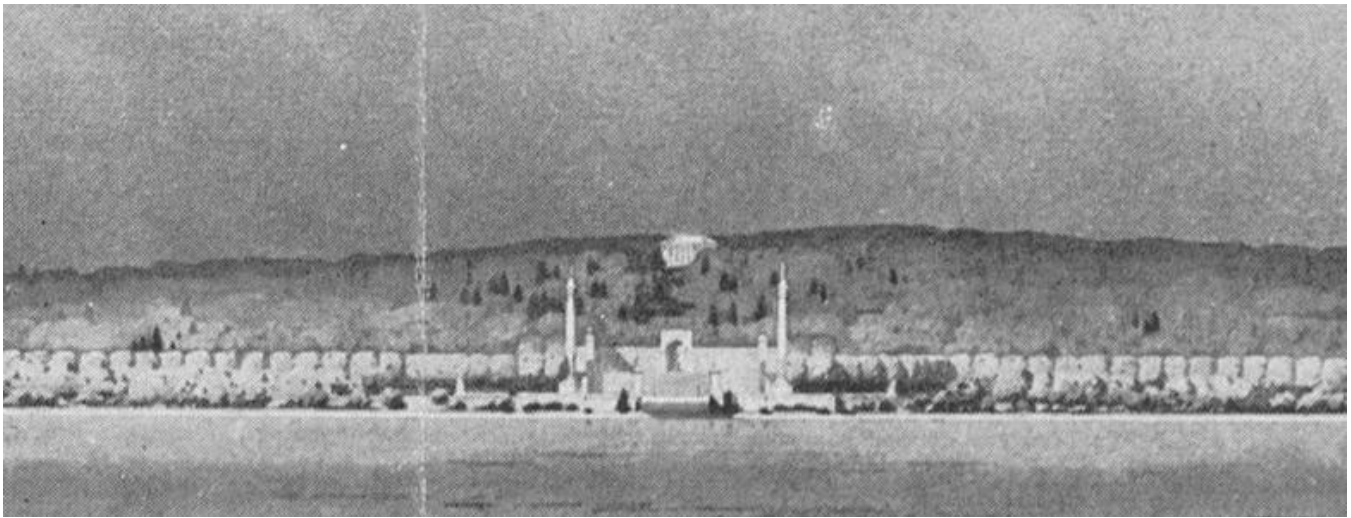
The DC SHPO concurs with the expanded Area of Potential Effect (APE) and NPS's determination that even more historic properties than originally anticipated will be adversely affected by the undertaking. According to the NPS summary tables (see attached), these include at least six National Historic Landmarks, eight historic districts, eight cultural landscapes and twenty individual properties.

However, we do not agree with every proposed finding of "no adverse effect." Theodore Roosevelt Island, for example, would also be adversely affected since its boundaries extend south of the bridge that the AOE suggests will block views of the arch. The use of 320' tower cranes for approximately one full year of construction would also cause adverse visual effects. Archaeological resources may also be adversely affected (see additional comments that follow).

In more general terms, we find that the language used to describe the nature of the adverse effects significantly underestimates the degree to which the integrity of the affected historic properties would be diminished. For example, the arch would not merely be "prominently visible." Instead, it would visually overwhelm the surrounding historic context. Likewise, the balanced architectural relationship of the Arlington Memorial Bridge complex would not merely be "altered." Instead, it would be irreparably compromised. Both these concerns are particularly relevant to the Lincoln Memorial since the proposed 250' arch would be more than twice as tall as the 99' memorial.

Foremost among our concerns with the revised AOE are the counterintuitive arguments the Purpose and Need section suggests as justification for the adverse effects. The NPS has cited the 1924 Report of the Arlington Memorial Bridge Commission and the corresponding 1925 Act of Congress authorizing construction of the bridge and related features as the legal basis for building an arch in Memorial Circle. Other sections of the AOE make similar references to suggest the arch is “inherently location dependent” and that it will somehow “complete” the McKim Mead & White design contemplated in the 1924 Report. The DC SHPO does not agree.

Obviously, neither the 1925 Act of Congress nor the design of Memorial Circle contemplated the 250th anniversary of our nation since both were completed over a century before the event. Moreover, McKim Mead & White’s design envisioned two slender columns carefully situated to frame the view between the Lincoln Memorial and Arlington House and to more directly signify reunification by using one column to symbolize the North and the other, the South (see rendering below).



In stark contrast, the proposed Triumphal Arch would effectively replace much of the important view with a frame – a massive frame that would significantly narrow and restrict, if not completely obstruct portions of the view corridor. And since the proposed arch does not symbolize reunification in any way, it would be more accurate to describe the current proposal as antithetical to McKim Mead & White’s design and the 1925 Act than to suggest it will fulfill or complete them in any way.

A triumphal arch would also run counter to the fervent opposition expressed by a significant majority of the more than 100,000 public comments the NPS solicited but does not appear to be heeding. We are still analyzing the massive electronic files, but our efforts thus far demonstrate that a majority of comments in opposition to the arch were submitted from all fifty states and most, if not all, U.S. territories. Matching, or possibly exceeding the national trend, approximately 93% of the roughly 11,000 comments submitted from within the District of Columbia expressed very strong opposition to the proposal.

Given the overwhelming public objections and related consulting party concerns, one would expect the AOE to offer some sort of generalized responses or at least justifications for why the comments are being disregarded. However, the only acknowledgment appears to be a public comment summary which downplays the volume of opposition by consistently using the ambiguous qualifier “some” to describe the number of objections. The consulting party comment summary merely lists the comments and provides no response of any sort. For these reasons, the DC SHPO requests the NPS to develop responses that, at a minimum, respond to the various headings under which the public comments were categorized (e.g. individual cultural resources, visitor experience, etc.).

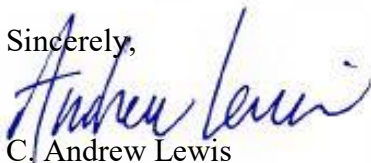
In addition to a lack of credible support for an arch in historic designs, past acts of Congress or current public opinion, what the AOE underscores more than anything is that the NPS has still failed to meaningfully identify and evaluate alternative designs or locations that could avoid or minimize the project’s multiple adverse effects. Consideration of smaller arches and the dismissal of the South Capitol Street alternative site we previously suggested fail to constitute adequate consideration of alternatives, especially in light of the number and nature of the adverse effects.

Since NPS seems convinced that Memorial Circle is the most fitting site for a commemorative monument, we request meaningful consideration of an alternative that more accurately reflects the spirit and intent of the 1924 McKim Mead & White design and the 1925 Act of Congress. Specifically, we request the NPS to evaluate design concepts consisting of two columns that truly frame, rather than limit the historic view corridor. We maintain that the development and meaningful consideration of some such alternative designs and/or alternative locations is essential for the NPS to comply with the most fundamental requirements of Section 106 for this undertaking.

With regard to archaeology, the NPS determined that Phase I archaeological identification survey was warranted but the draft Phase IB workplan received by the DC SHPO on August 24, 2026, was not approved. Following consultation with NPS on September 9, 2026, the archaeological consulting team is revising the draft archaeological workplan to include geoarchaeological coring and analysis by a qualified geoarchaeologist. The need for and locations of subsequent Phase IB mechanical trenching will be determined during consultation when the results of the geoarchaeological investigations are available. Until the identification survey is complete and identified resources are evaluated, the DC SHPO will be unable to assess the effects of this undertaking on archaeological resources.

If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to receiving the information requested in this letter at your earliest convenience and to consulting further with all parties to continue the Section 106 review of this undertaking.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
District of Columbia State Historic Preservation Office

TRIUMPHAL ARCH ADVERSE EFFECT SUMMARY TABLES

Historic Properties

	Total Assessed	Adverse Effect	No Adverse Effect
National Historic Landmarks	31	6	25
Historic Districts	53	8	45
Cultural Landscapes	10	8	2
Individual / Other Historic Properties	167	20	147
TOTAL	261	42	219

Historic Properties – Adverse Effect

National Historic Landmarks — 6

- Fort Myer NHL District
- Georgetown Historic District
- National War College
- Old Naval Observatory
- Pentagon
- United States Capitol

Historic Districts — 8

- Arlington National Cemetery Historic District
- Arlington House Historic District
- Mount Vernon Memorial Highway Historic District
- National Mall Site and National Mall Historic District
- Washington Monument and Grounds Historic District
- Rock Creek and Potomac Parkway Historic District
- East and West Potomac Park Historic District
- Observatory Hill Historic District

Cultural Landscapes — 8

- Memorial Avenue Corridor Cultural Landscape
- Lady Bird Johnson Park Cultural Landscape
- Arlington House Cultural Landscape
- Lincoln Memorial Cultural Landscape
- The Mall Cultural Landscape
- Washington Monument and Grounds Cultural Landscape
- Thomas Jefferson Memorial Cultural Landscape
- Mount Vernon Memorial Highway North Cultural Landscape Inventory

Individual / Other Historic Properties — 20

- Arlington Memorial Bridge and Associated Features
- Arlington House (Robert E. Lee Memorial)
- Lyndon B. Johnson Memorial Grove
- Lincoln Memorial
- World War II Memorial
- Washington Monument
- L'Enfant Plan of the City of Washington, District of Columbia
- Arlington Ridge Park
- George Mason Memorial
- Thomas Jefferson Memorial
- Alban Towers Apartment Building
- American Institute of Pharmacy Building
- George Washington Memorial Parkway
- Halcyon House
- Francis Scott Key Bridge
- National Cathedral
- Vigilant Firehouse
- Bridge #5020 / State Bridge #5020
- Old Warehouse Area and Ground Maintenance Complex
- Frederick Douglass National Historic Site