

National Park Service
U.S. Department of the Interior

George Washington Memorial Parkway
Washington, DC



Triumphal Arch at Memorial Circle
Assessment of Effects Report
August 2026
(Revised)

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Introduction

The National Park Service (NPS) is developing a design for the construction of a monumental arch, the Triumphal Arch (the Arch), within the George Washington Memorial Parkway (Parkway) in Washington, D.C.

The NPS is responsible for completing the Section 106 review for this undertaking under Section 106 of the National Historic Preservation Act of 1966 (NHPA), 54 U.S.C. § 306108, and its implementing regulations (36 CFR Part 800). This Assessment of Effects (AoE) report evaluates the potential effects to historic properties from the proposed construction of the Triumphal Arch (referred to as “the undertaking” in this document) as outlined in 36 CFR § 800.5(a). Potential effects on archeological resources are assessed in a separate Phase IA Archeological Assessment prepared in conjunction with this Assessment of Effects report. It is being prepared as part of the continuing consultation process between the NPS, the District of Columbia Historic Preservation Office (DC HPO), Virginia Department of Historic Resources (VDHR), Federally Recognized Tribes, and other consulting parties.

Section 110(f) of the NHPA (54 U.S.C. § 306107) requires that “prior to approving any undertaking that may directly and adversely affect any” National Historic Landmark (NHL), agencies “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to the landmark.” The Area of Potential Effect (APE) for the proposed undertaking includes several NHLs, and Section 110(f) applies to this assessment of effects for the proposed undertaking.

Section 106 consultation for the proposed undertaking was initiated with DC HPO, VDHR, and other entitled consulting parties per 36 CFR § 800.2(c)(1) and (3) on June 5, 2026. **Appendix A: List of Consulting Parties.**

The NPS prepared an environmental assessment (EA) to assess the proposed action and alternatives and their potential impacts on the environment in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended that was released to the public on June 18, 2026 on the NPS Planning, Environment, & Public Comment (PEPC) website ([ParkPlanning - Triumphal Arch - Environmental Assessment and Finding of No Significant Impact](#)).

Project Area Description

The Arch would be located within Memorial Circle, a formally designed feature of the Parkway at the west end of Arlington Memorial Bridge. The Parkway, administered by the NPS, is a 25-mile scenic and commemorative corridor along the Potomac River that integrates early twentieth century landscape design with transportation, cultural resources, and recreational access. Developed to honor President George Washington and to connect significant historic and cultural sites, it blends naturalistic plantings with sculptural features.

Memorial Circle lies within Lady Bird Johnson Park, a human-made island constructed between 1915 and 1930 and renamed in 1968 in recognition of First Lady Claudia “Lady Bird” Johnson’s conservation and beautification efforts. The park’s landscaped grounds, native trees, pedestrian and bicycle facilities, and cultural features, including the Lyndon Baines Johnson Memorial Grove and the Navy–Merchant Marine Memorial, provide the broader setting that frames and supports Memorial Circle within the Parkway corridor.

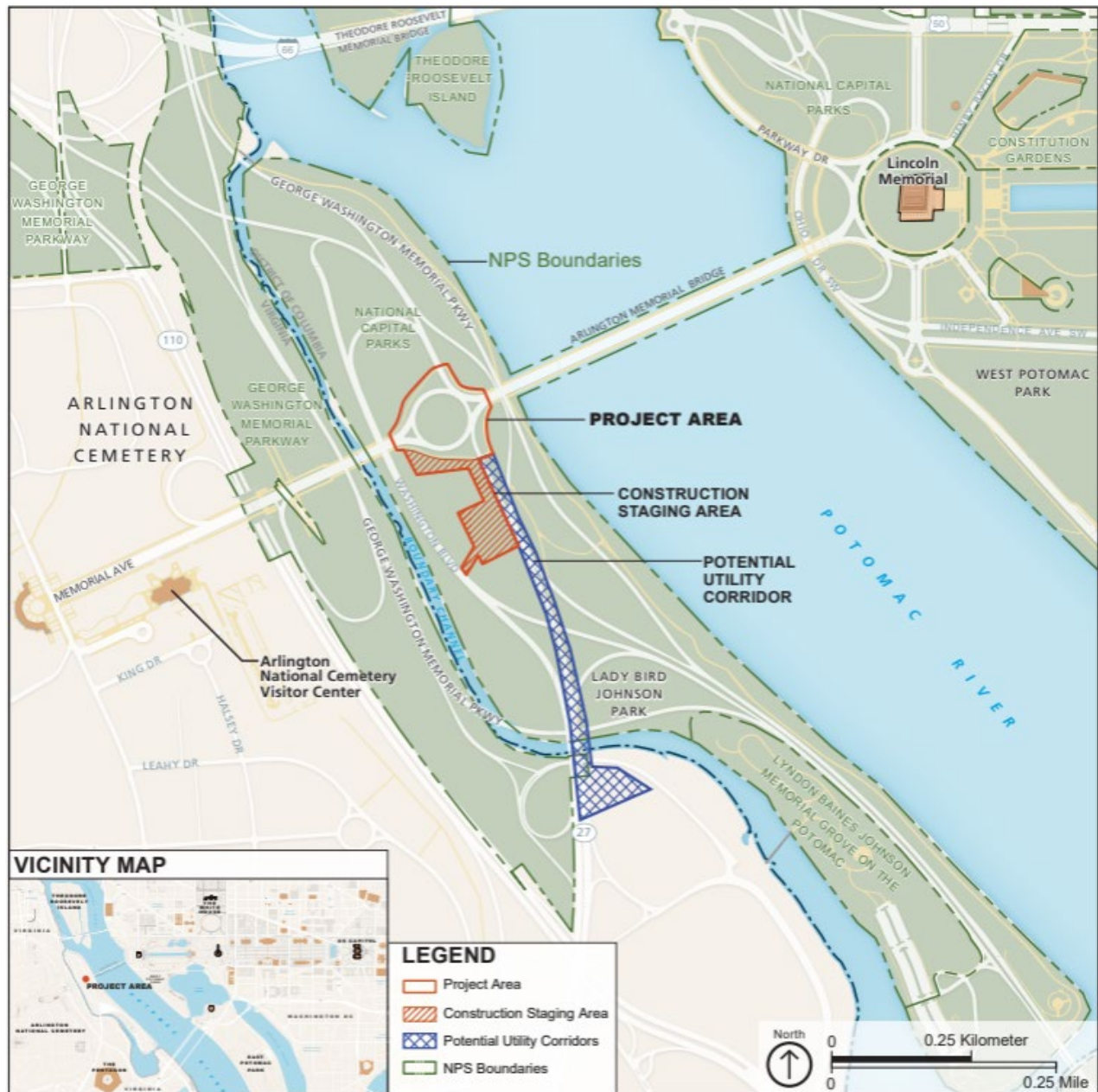


Figure 1: Project Location

Summary of Consultation

A preliminary AoE was released for public review on June 5, 2026 and was open to public comment from June 5 – June 15, 2026. Project materials were provided through the Planning, Environment, and Public Comment (PEPC) system, and comments were accepted on the same platform. This comment period allowed consulting parties, organizations, and members of the public an additional opportunity to review the Assessment of Effects and the draft Programmatic Agreement and to provide feedback on these materials, consistent with the requirements of 36 CFR Part 800. ([ParkPlanning - Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement](#)). The NPS received a total of 100,936 comments during this period. The NPS developed a comment summary that was developed as follows – the NPS downloaded the public comments from PEPC and other channels and used artificial intelligence (AI) tools to organize the comments by subject matter themes. NPS subject matter experts developed and tested tailored prompts to ensure the AI output accurately reflected the full range of issues raised by commentors. Using these AI-generated digests as a foundation, the NPS subject-matter experts reviewed the comments, synthesized them into broader themes, and prepared the comment report. **Appendix B: June 5 – June 15 Public Comment Summary**

Due to additional public interest, the NPS reopened and extended the opportunity to comment from July 10, 2026, to July 30, 2026. During this July comment period, the NPS received a total of 6,254 comments. A comment summary addendum was created in the same manner as the comment summary. Most of the comments submitted during this comment period were already addressed in the summary report prepared for the previous comment period. To avoid redundancy, the addendum addresses only the new comments received. **Appendix C: July 10 – July 30 Public Comment Summary**

On July 10, 2026, the NPS requested, via email, that consulting parties provide their comments and concerns regarding the list of historic properties that was released on June 5, 2026. Comments were due by July 19, 2026. By close of the comment period, the NPS received comments from DC HPO; Virginia DHR; Washington Headquarters Services/Department of War; Arlington County Historic Preservation Program; National Parks Conservation Association; The Cultural Landscape Foundation; Arlington Historical Society; American Institute of Architects |DC; Committee of 100 on the Federal City; National Mall Coalition; National Trust for Historic Preservation. **Appendix D: July 10 – July 19, 2026 Consulting Party Comment Summary**

On July 28, 2026, the NPS requested DC HPO, VDHR, and consulting parties review and comment of a revised APE and list of historic properties by August 6, 2026. By close of the comment period, the NPS received comments from Family Circle of Descendants at Arlington House; National Capital Planning Commission staff; DC Preservation League; National Mall Coalition; National Parks Conservation Association; The Cultural Landscape Foundation; Virginia Department of Historic Resources; Arlington County Historic Preservation Program;

NPS National Historic Landmarks Program; Institute of Architects |DC; and National Trust for Historic Preservation. **Appendix E: August 6, 2026 Consulting Party Comment Summary**

This revised AoE has been prepared as part of the continuing consultation process between the NPS, the DC HPO, VDHR, Federally Recognized Tribes, and other consulting parties.

Description of the Undertaking

The following section describes details of the undertaking, including the purpose of and need for taking action.

Purpose and Need

The purpose of the proposed undertaking is to celebrate 250 years of American independence by honoring America's founding principles through installation of an arch 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, D.C. and the gateway to Arlington National Cemetery, physically and symbolically uniting the nation's history along a corridor already lined with monuments honoring diverse figures of American significance. Executive Order (EO) 14252, *Making the District of Columbia Safe and Beautiful*, directs the Secretary of the Interior to develop proposals to ensure federal buildings and lands uplift and beautify public spaces and generate in the citizenry pride in and respect for our nation, promoting beautification and the preservation of our history and heritage. Installation of an appropriate structure presents an opportunity to advance that directive within one of the most symbolically significant corridors in the Capital.

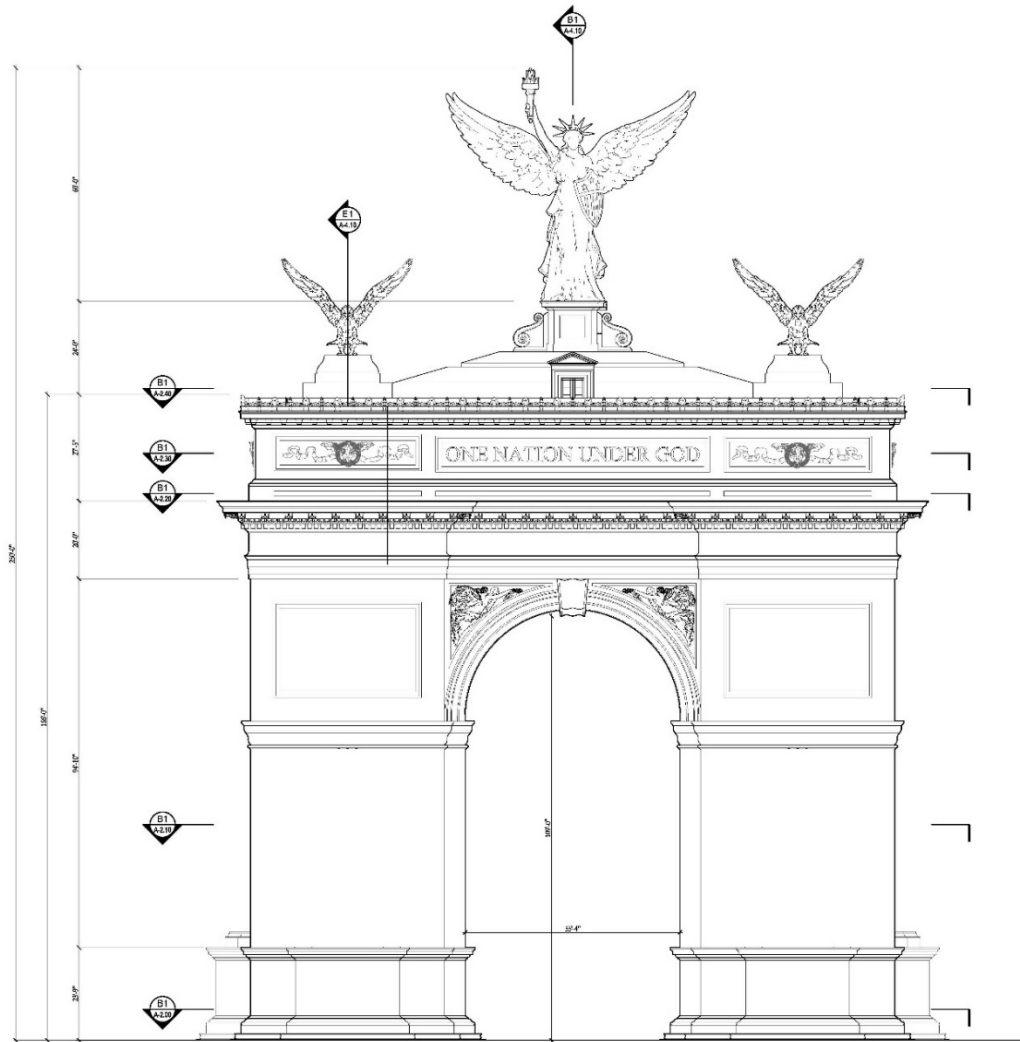
Proposed Undertaking

The proposed undertaking includes construction of the 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.

Appendix F contains plans, sections, and renderings of the proposed undertaking. These are for illustration purposes only and may not reflect the final design.

The Arch would be an approximately 250-foot-tall reinforced concrete structure clad in granite and ornamented by a central winged figure and two eagles, positioned above each Arch leg. Dimensions will be finalized during future design efforts. The following dimensions are current approximations. The principal architectural component would rise approximately 166 feet above finish grade, with surmounting statuary extending the total height to approximately 250 feet. The main footprint of the structure would be approximately 91 feet by 166 feet, with a 15,197-square-foot footprint at ground level. The maximum lateral projection at the upper cornice would extend to 107 feet 4 inches by 183 feet 4 inches. The structure would contain 70,072 gross square feet distributed across five levels: a ground level, two service mezzanine levels would not be open to the general public, a gallery level, and an observation deck level. The observation

deck would provide 9,812 square feet of exterior deck area at 161 feet 6 inches above grade. The Arch would serve as a monumental architectural feature aligned with the axis between Memorial Avenue and the Arlington Memorial Bridge. The Arch would be 166 feet wide with a 55-foot-wide opening, providing views from the observation deck to area landmarks.



The Arch would be built from concrete and finished with granite. The granite used for the Arch would be sourced from one of three quarries, located in Vermont, North Carolina, or California, depending on availability and desired color.

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

The Arch would include six stairways and five elevators. Two pairs of elevators in the north and south legs would serve the lower public levels, and a fifth elevator would serve the observation deck. Two large circular spiral stairs would connect the ground level to the gallery level; two elliptical spiral stairs would connect the gallery level to the observation deck; and two egress stairs would connect all levels to dedicated exit-only doors at grade. (see Appendix F for details)

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

The Arch would be illuminated using a low spill, fully shielded lighting system designed to highlight the Arch. Illumination of the Arch would be supplemented by eight light stanchions, ranging from 14 to 20 feet in height, strategically located around the intersection. In addition, aviation required safety lighting would be incorporated into the design using the least intrusive technology available, ensuring compliance with aircraft visibility requirements while limiting unnecessary light emission.

Project Alternatives

The NPS did not evaluate alternative locations outside Memorial Circle because the proposed undertaking is grounded in the historic design intent for the Arlington Memorial Bridge and Memorial Avenue corridor. The location is not being treated as an interchangeable site for a new commemorative feature; rather, it is the specific location identified in the historic planning framework for the bridge, Memorial Avenue, and Columbia Island/Memorial Circle. The 1924 Report of the Arlington Memorial Bridge Commission described a design concept that included monumental vertical elements at Columbia Island in connection with the bridge's western terminus and the ceremonial approach to Arlington National Cemetery. Those proposed columns were intended to frame, mark, and give architectural emphasis to the transition between Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, and the entrance sequence to Arlington National Cemetery.

Because the current undertaking is intended to respond to and complete that historically contemplated idea at Memorial Circle, the NPS focused its review on whether the proposed Arch, in this location, would affect historic properties and how those effects could be addressed. Locations elsewhere in Washington, D.C. or Virginia would represent a materially different undertaking because they would not implement or reference the 1924 Arlington Memorial

Bridge Commission concept for monumental features at Columbia Island/Memorial Circle. Alternative locations may reduce or avoid some adverse effects associated with Memorial Circle, but they would also sever the project from the specific historic planning precedent that provides the rationale for the undertaking's placement. For that reason, the NPS did not carry forward alternative locations outside Memorial Circle as reasonable alternatives for this undertaking.

Over several decades, the Commission of Fine Arts reviewed concepts including a large elliptical plaza framed by formal cross-axes, monumental pavilions, and prominently, two columns representing national reunion. Although successive design revisions in the 1930s scaled back these ambitions, reducing three planned circles to one and replacing proposed monumental columns with smaller sculptural pavilions, the original vision of a major commemorative feature anchoring the Circle was never fulfilled. The selected action, a Triumphal Arch, continues this historic lineage by introducing a focal point that reflects the site's intended character and celebrates 250 years of American independence. In doing so, it completes a century-old civic design concept while providing a new interpretive and experiential landmark.

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

Changes to Vehicle, Pedestrian, and Bicycle Use

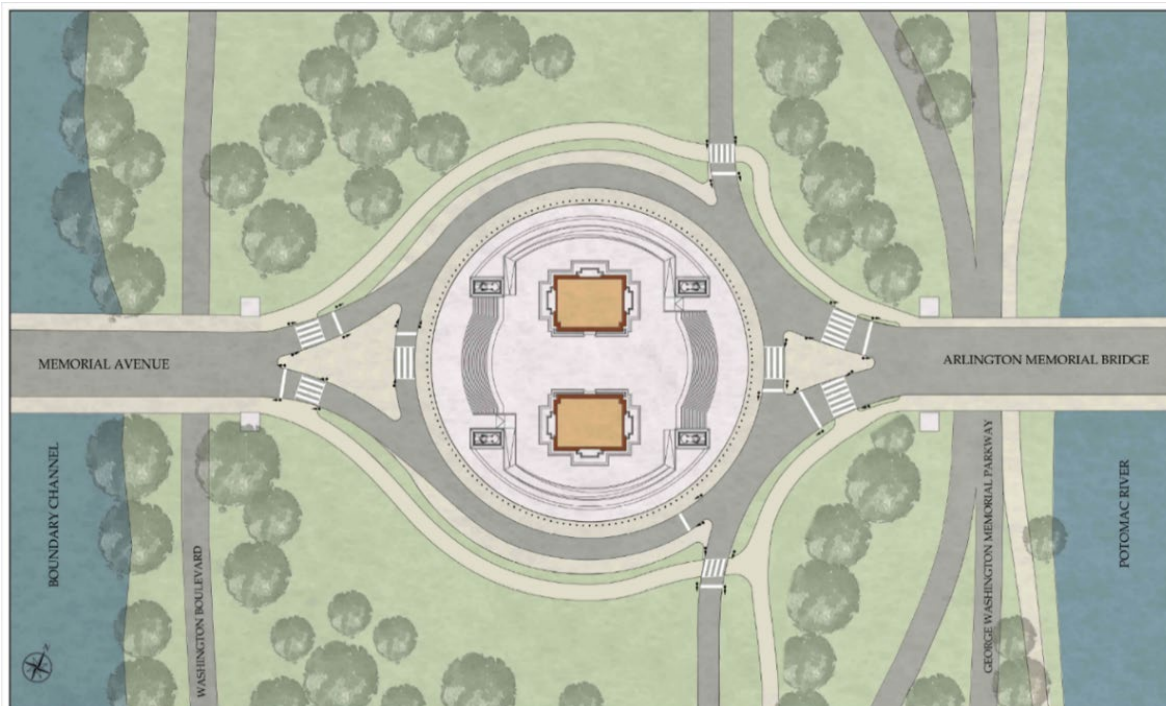
During construction, temporary closures would be implemented, those include:

- Westbound traffic from Arlington Memorial Bridge will be reduced to two lanes.
- Eastbound traffic from Memorial Avenue will not be able to turn northbound on Arlington Boulevard and will be directed onto Arlington Memorial Bridge.
- Northbound traffic from Washington Boulevard will not be permitted into the circle but will need to turn right onto Arlington Memorial Bridge.
- The sidewalk on the south side of the Circle would be temporarily rerouted to the north side.

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

Under the proposed undertaking, new traffic signals would be installed to control vehicle movements within and around Memorial Circle. The signalization plan would coordinate signal phases for all major vehicle approaches and activate pedestrian crossing phases through passive detection to ensure safe and efficient circulation for all users. These upgrades would replace existing yield and merge conditions with full signal control. Signalization-related changes include:

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



The proposed undertaking would also include implementation of a series of physical modifications within and around Memorial Circle. These improvements would reshape roadway geometry, expand pedestrian space, and incorporate new materials and features that calm traffic and create safer conditions for people walking. Construction activities would include enlarging

key median islands, converting existing pavement treatments to more durable and pedestrian friendly materials, and adjusting the circulating roadway to reduce speeds and better accommodate all users. Physical construction-related changes include:

- Enlarged median islands on the east and west sides of Memorial Circle
- Circulating roadway narrowed to approximately 20 feet
- Conversion of the pavement marked truck apron to a mountable concrete truck apron
- Replacement of existing Belgian block along the outer edge of the Circle with grass
- Recommended safety design features such as raised crossings, curb extensions, median refuge islands, reduced curb radii, and rumble strips
- Construction phase changes, including closure of the south half of the Circle, detouring two-way traffic to the north side, elimination of certain left-turn movements, and temporary pedestrian routing with a new temporary crosswalk that is designed in compliance with the Americans with Disabilities Act (ADA) and the Architectural Barriers Act (ABA) and that meets the Public Right-of-Way Accessibility Guidelines (PROWAG) incorporated into the ABA Accessibility Standards.

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

A detailed description of the proposed changes, including maps, figures, and alternative comparisons, is provided in **Appendix G: Transportation Plans**.

Construction Phasing

Construction of the Arch would occur in multiple phases over an approximately two-to-three-year period. Construction activities would generally proceed as described below.

Phase 1—Site Excavation (2–3 months). The initial phase would include site preparation, excavation within the construction footprint, and installation of temporary utilities. Temporary fencing, erosion and sediment control measures, stormwater management protocols, and staging areas would be established. Temporary pedestrian, bicycle and vehicle detours would be implemented.

Phase 2— Foundation and Support of Excavation (4–5 months). Following excavation, drill rigs would be mobilized to install the deep foundation system. Caissons would be installed to a depth of approximately 75 feet to reach bedrock. This phase would involve drilling and constructing reinforced concrete piles to support the future structure. Continuous heavy equipment operations would occur during this period.

Phase 3—Structural Concrete (10–11 months). After the foundation system is completed, crews would construct the primary structural components of the Arch. This phase would include use of

tower cranes (up to 320 feet tall), forklifts, skid steers, and concrete pump systems to construct the vertical and horizontal elements of the Arch.

Phase 4–Precast Cladding (4–5 months). During this phase, the granite panels would be affixed to the Arch. Granite panels would be delivered from their source quarry and assembled on-site as the structure progresses. At the same time, work inside the structure would begin, including installing the stairs and elevators, starting the roofing system to make the building weather tight, and beginning major mechanical, electrical, and plumbing work.

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

Phase 6– Site Hardscapes / Landscaping / Project Completion (6–7 months). At this phase, the project would be near completion. All the stone pavers and site walls would be set during this time, as well as the completion of any other landscape, hardscape, and stormwater management facilities. The interior features would be completed. The demobilization process would be underway and any construction related temporary traffic control would be removed. Permanent traffic changes, including changes to signalization, installation of crosswalks, etc. would be put in place.

Phase 7–Site Restoration and Demobilization (2 months). At the conclusion of construction, the contractor would remove temporary infrastructure, staging materials, and construction fencing. Disturbed turf and landscape areas within NPS jurisdiction would be restored to preconstruction conditions.

Staging Areas

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

Utility Installation

To support operation of the Arch and associated facilities, new potable water, sanitary sewer, electric, gas and telecommunications utilities would be extended to the Memorial Circle area. Connection from existing utilities that would run south along Washington Boulevard to the north

end of the Pentagon campus limits and then extend south further into the campus to access available infrastructure. Perform all road crossings using jack-and-bore methods and cross Boundary Channel using directional drill techniques.

Stormwater Management Actions During Construction

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

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

Long-term Stormwater Management

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

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

Groundwater and Dewatering Approach

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

Soil Excavation

The project would require the removal of approximately 1,400 truckloads of existing soils and the import of roughly 400 truckloads of engineered fill. All construction vehicles would be staged within the designated south project staging lot, with loading and unloading occurring inside the project fence to reduce congestion on adjacent roadways. Daily trucking activity is anticipated to involve between 20 and 30 trucks, transporting an estimated 80 to 100 loads per day. Excavated soils would be transported to approved disposal facilities in Maryland or Virginia, contingent upon the results of in situ characterization and contamination testing.

Construction Equipment and Work Hours

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

Road Closures and Transportation Routes

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

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

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

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

Construction deliveries and haul-off activities would primarily access the project site via I395 using Route 27, which provides the most direct and operationally feasible connection to the south project staging area. As a secondary option, U.S. Route 50 (Arlington Boulevard) may be used when needed, as it offers acceptable access for construction vehicles.

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

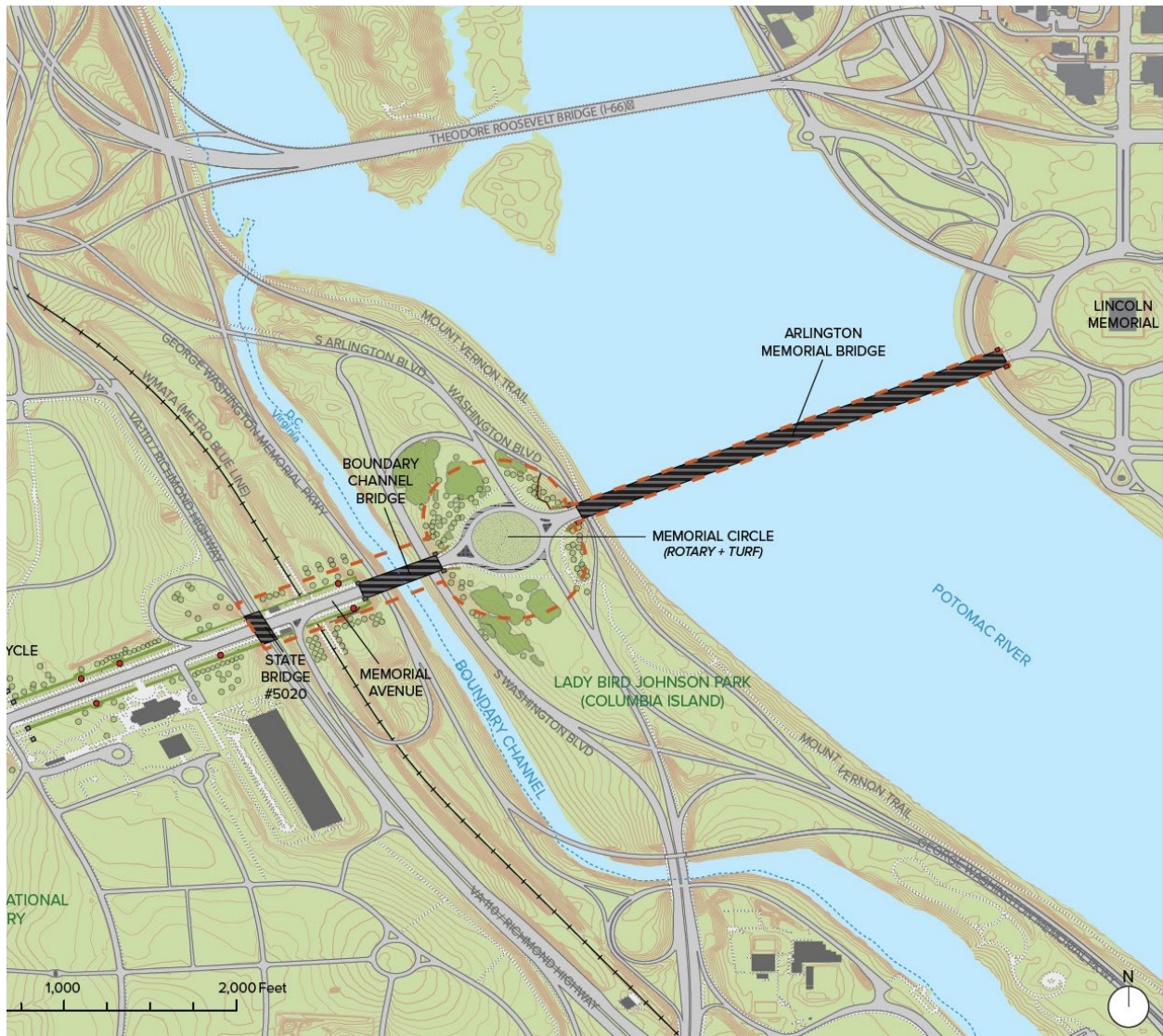
Proposed Visitor Access and Visitor Facilities at the Triumphal Arch

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

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

Historical Summary of the Project Area

The immediate project area is located within the Memorial Avenue Corridor cultural landscape, a nationally significant historic designed landscape extending between the Lincoln Memorial in Washington, D.C., and Arlington National Cemetery in Arlington, Virginia.



The corridor consists of the Watergate Steps, the Rock Creek and Potomac Parkway Entrance, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue Bridge over Boundary Channel, Memorial Avenue, and the ceremonial entrance sequence into Arlington National Cemetery at the Arlington Hemicycle. Memorial Circle serves as the link between the Arlington Memorial Bridge and Memorial Avenue, providing a hub to secondary destinations and routes within a compressed urban geography. The circular travel pattern provides a scenic route for commuters to experience the Memorial Avenue Corridor. The entirety of the corridor forms a major component of the monumental core of Washington, D.C. and was conceived as both a

ceremonial gateway to the nation's Capital and a symbolic landscape commemorating national unity and reconciliation following the Civil War.

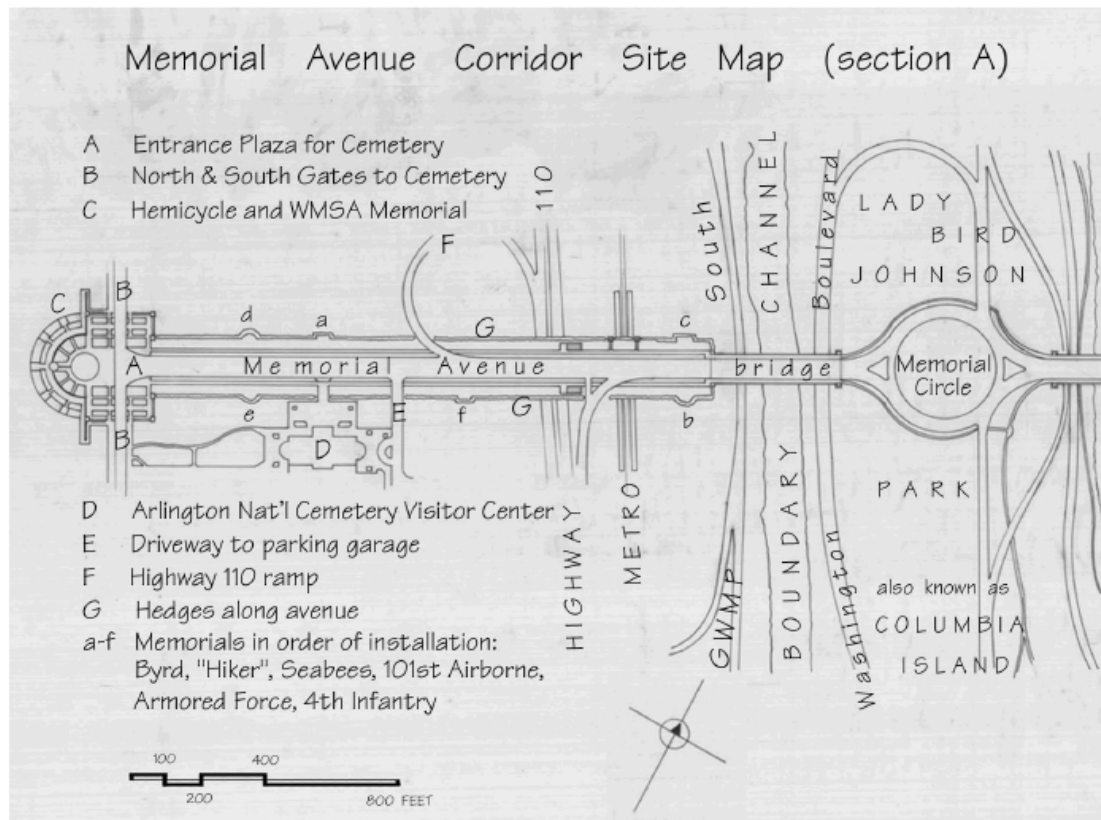


Figure 2 - Section A of the site plan shows the western end of the corridor. Parts of the composition are either named or marked with a letter and identified in the legend. (Drawing by D. Guenther.)

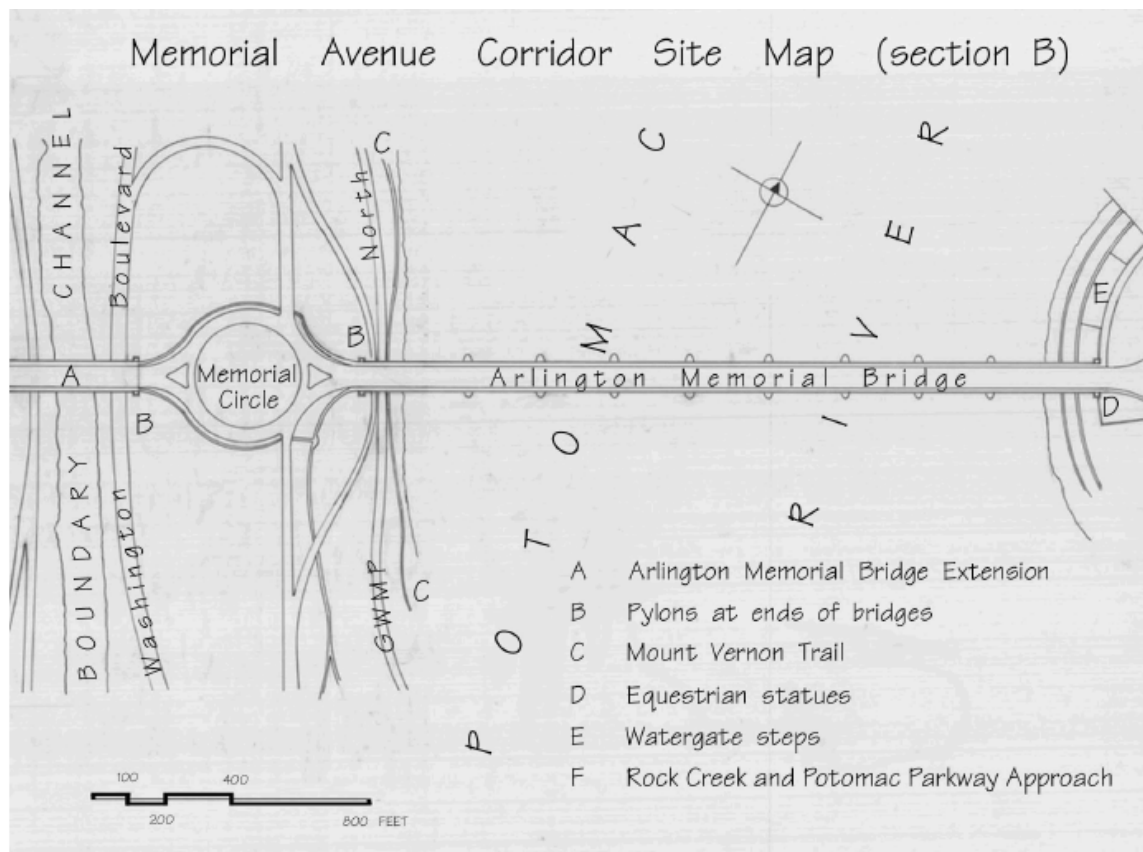


Figure 3 - Section B of the site plan shows the eastern half of the composition. Features are either named or described in the legend. (Drawing by D. Guenther)

The conceptual origins of the corridor date to the report of the 1901–1902 Senate Park Commission, commonly known as the McMillan Plan (U.S. Congress 1902), which proposed a monumental bridge and axial landscape composition linking the planned Lincoln Memorial with Arlington House, the former home of Robert E. Lee.

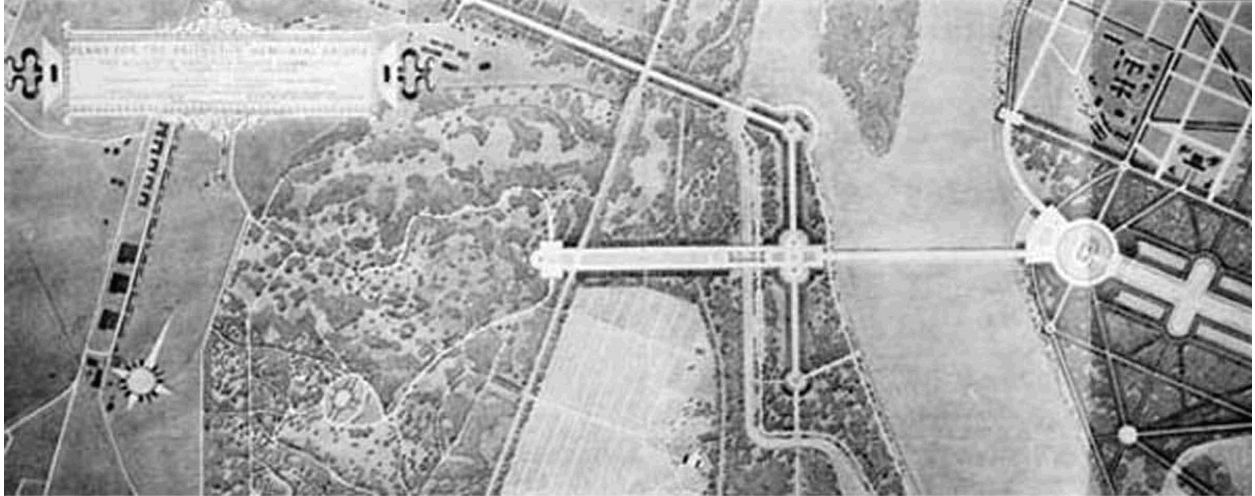
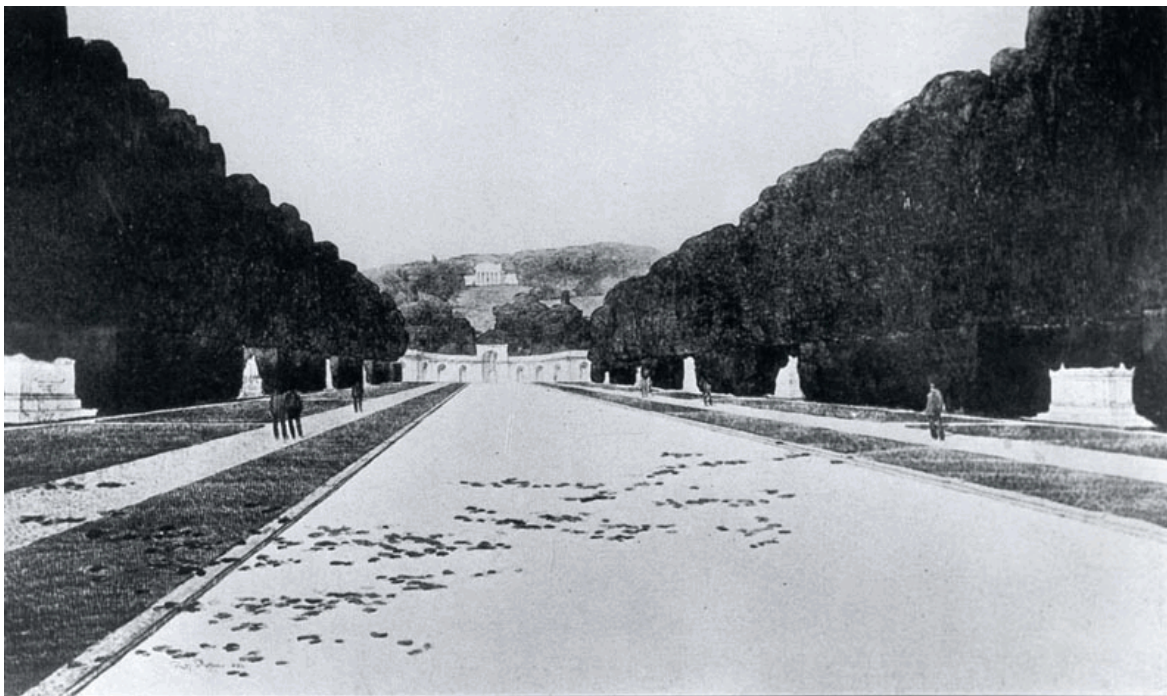


Figure 4 - General Plan for Arlington Memorial Bridge prepared for the Arlington Memorial Bridge Commission by McKim, Mead and White and published in the Commission's 1924 report. (AMB Commission Report)

The bridge alignment and associated ceremonial landscape were intended to physically and symbolically unite North and South through a coordinated monumental composition extending across the Potomac River. The corridor was designed principally by the architectural firm McKim, Mead & White under project architect William Mitchell Kendall and reflects the formal planning principles of the City Beautiful movement and Beaux-Arts monumental design.



ARLINGTON NATIONAL CEMETERY: ENTRANCE FROM THE MEMORIAL BRIDGE
MCKIM, MEAD & WHITE, ARCHITECTS

Figure 5 - McKim, Mead and White perspective drawing of proposed Memorial Avenue entitled "Arlington National Cemetery: Entrance from the Memorial Bridge" c. 1929. (MRCE: Arlington National Cemetery folder, 5584-F)

Construction of the corridor occurred in phases between the 1920s and 1940s. Arlington Memorial Bridge was constructed between 1926 and 1932, while Memorial Avenue and associated bridge and landscape features were developed concurrently. The corridor was designed as a processional sequence integrating architecture, engineering, sculpture, transportation systems, vegetation, and expansive reciprocal views. Arlington Memorial Bridge established a new monumental crossing of the Potomac River and extended the east-west monumental axis of Washington westward toward Arlington National Cemetery and Arlington House. The corridor was conceived as an “Avenue of Heroes,” with memorial niches and commemorative landscapes incorporated into the overall design framework.



Figure 6 - Cemetery entrance and avenue under construction, June 13, 1931. Boundary Channel Bridge nearly completed. Line of trees in middle range mark former railroad/canal. (NPS/NCR: Fairchild Aerial, 17665)

Memorial Circle occupies a central and highly significant position within this composition. Located on Columbia Island, now known as Lady Bird Johnson Park, Memorial Circle forms the ceremonial hinge between Arlington Memorial Bridge, Memorial Avenue, the George Washington Memorial Parkway, and the Mount Vernon Memorial Highway. Early plans for the Columbia Island plaza envisioned a far more monumental treatment than the traffic rotary

This diagrammatic plan illustrates the layout of the Washington Monument grounds, centered around the Washington Monument (labeled 'MONUMENT' in the center). The plan shows the following features:

- Walls and Balustrades:**
 - WEST CIRCULAR BALUSTRADE NORTH
 - EAST CIRCULAR BALUSTRADE NORTH
 - WEST BALUSTRADE NORTH
 - EAST BALUSTRADE NORTH
 - WEST BALUSTRADE SOUTH
 - EAST BALUSTRADE SOUTH
 - WEST CIRCULAR BALUSTRADE SOUTH
 - EAST CIRCULAR BALUSTRADE SOUTH
- Paths and Walkways:**
 - PED. WALK 'ST. LAWRENCE'
 - PED. WALK 'ATLANTIC'
 - PED. WALK 'SOUTH'
 - PED. WALK 'PACIFIC'
- Structures and Landmarks:**
 - BOUNDARY CHANNEL BRIDGE
 - PIYLON NT6
 - PIYLON NT7
 - PIYLON NT4
 - PIYLON NT3
 - MEMORIAL BRIDGE
 - WEST PLAZA WALL NORTH
 - EAST PLAZA WALL NORTH
 - WEST PLAZA WALL SOUTH
 - EAST PLAZA WALL SOUTH
- Dimensions and Distances:**
 - 50'-0"
 - 100'-0"
 - 150'-0"
 - 200'-0"
 - 250'-0"
 - 300'-0"
 - 350'-0"
 - 400'-0"
 - 450'-0"
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- Scale:** 1" = 128'-0"

Architectural drawings of the Washington Monument and surrounding plaza walls. The drawings include:

- West Elevation - West Plaza Walls Etc.**: Shows the Boundary Channel Bridge, West Plaza Wall - South, and the West Circular Balustrade - North. Annotations include "BOUNDARY CHANNEL BRIDGE", "WEST PLAZA WALL - SOUTH", "WEST CIRCULAR BALUSTRADE - NORTH", and "ELEVATION - WEST-EAST AXIS OF PLAZA LOOKING NORTH".
- East Elevation - East Plaza**: Shows the East Plaza Wall - South, Memorial Bridge, and the East Circular Balustrade - North. Annotations include "EAST PLAZA WALL - SOUTH", "MEMORIAL BRIDGE", "EAST CIRCULAR BALUSTRADE - NORTH", and "ELEVATION - WEST-EAST AXIS OF PLAZA LOOKING NORTH".
- Elevation - West-East Axis of Plaza Looking North**: Shows the Washington Monument column and the West Circular Balustrade - South Exterior Elevation. Annotations include "WASHINGTON MONUMENT", "WEST CIRCULAR BALUSTRADE - SOUTH EXTERIOR ELEVATION", and "ELEVATION - WEST-EAST AXIS OF PLAZA LOOKING NORTH".

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Additional proposals included monumental pavilions, fountains, balustrades, Greek temples, and cross-axis roadway compositions before the design was gradually simplified through the 1930s into the existing traffic rotary configuration designed principally by landscape architect Gilmore D. Clarke.

Memorial Circle was ultimately constructed beginning in 1940 and was intended to function as a formal organizing landscape feature within the larger ceremonial composition extending between the Lincoln Memorial and Arlington National Cemetery. Four monumental pylons framing the entrances to Arlington Memorial Bridge and Memorial Avenue were among the principal architectural features implemented from the earlier McKim, Mead & White design concepts.

The landscape surrounding Memorial Circle evolved substantially during the mid-twentieth century. While early designs emphasized formal open spatial relationships around the rotary, the character of the surrounding landscape changed during implementation of the Beautification Program associated with First Lady Claudia “Lady Bird” Johnson during the 1960s. Landscape architect Edward Durell Stone, Jr. developed a planting plan for Columbia Island that introduced extensive plantings of flowering dogwoods, white pines, daffodils, and other vegetation around Memorial Circle and throughout Lady Bird Johnson Park. These plantings transformed the character of Memorial Circle from a largely open rotary into a more heavily framed and naturalistic landscape setting while maintaining the circle’s ceremonial and commemorative role within the larger corridor composition.

Today, the Memorial Avenue Corridor remains nationally significant for its architecture, landscape architecture, engineering, sculpture, and community planning associations, as well as for its symbolic role linking the Lincoln Memorial, Arlington National Cemetery, and Arlington House through a unified monumental landscape composition. Character-defining features include the axial organization of the corridor, ceremonial circulation systems, formal views and vistas, memorial landscapes, bridge and roadway structures, holly hedges and white oak plantings along Memorial Avenue, and the reciprocal visual relationships across the Potomac River between the monumental core of Washington and the Arlington landscape.

Consistent with these historical associations and design developments, the 2024 cultural landscape report (Frisbie et al. 2024) defines the period of significance for the Memorial Avenue Corridor as 1901–1979, and recognizes its significance at the national level under Criteria A (in the area of Politics/Government) and C (in the areas of Architecture, Engineering, Landscape Architecture, Art—Sculpture, and Community Planning and Development), and also Criteria Consideration F (Commemorative property) and G (property elements added within the last 50 years). This period of significance, and these areas of significance, encompass the initial conception and composition of the corridor as a commemorative and recreational landscape, the construction of the Arlington Memorial Bridge and other corridor features, and the fuller realization of the corridor’s design through the installation of memorials and the landscape designs associated with landscape architect Edward Durell Stone, Jr.

Identification of Historic Properties

As part of the Section 106 process, the NPS made a good faith effort to identify historic properties that may be affected by the proposed undertaking. As defined in 36 CFR § 800.16(l), a historic property means any prehistoric or historic district, site, building, structure, or object listed or eligible for listing in the National Register of Historic Places (NRHP or National Register). The identification of historic resources was undertaken within the Area of Potential Effect (APE) established for the undertaking. The NPS presented a preliminary APE to the consulting parties at the first consulting party meeting held virtually on June 15, 2026. The APE was expanded as a result of comments received by the consulting parties to ensure all visual effects were considered. Efforts to identify historic properties within the APE for this undertaking included a review of information provided by the NPS, supplemented by other published and unpublished sources, primarily NRHP nomination forms, the DC Inventory of Historic Sites, Virginia Cultural Resources Information System, cultural landscape inventories, and landscape overview reports. The APE and historic properties within are described below.

Area of Potential Effect

The current regulations implementing Section 106 require the determination and documentation of the APE. The APE is defined in 36 CFR § 800.16(d) as:

“the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The APE for this undertaking includes the project area located at Memorial Circle, at the western terminus of Arlington Memorial Bridge and the eastern approach to Memorial Avenue and Arlington National Cemetery. The APE is centered on this location and extends outward in an approximately 3.5-mile radius to capture historic properties and cultural landscapes from which the proposed Arch may be visible or whose setting, views, vistas, circulation patterns, or commemorative relationships may be affected.

The APE includes the immediate project area at Memorial Circle, where physical changes associated with construction of the Arch, associated circulation improvements, security elements, lighting, utilities, stormwater facilities, and landscape modifications may directly affect historic properties and contributing landscape features. Within this core area are nationally significant resources associated with the cross-Potomac commemorative corridor, including Memorial Circle, Arlington Memorial Bridge and related features, Memorial Avenue, the Memorial Avenue Corridor Cultural Landscape, Lady Bird Johnson Park, Arlington National Cemetery, Arlington House, and the Arlington House Cultural Landscape. These resources are included because the undertaking would introduce a new prominent vertical element within a historically

designed landscape whose significance is tied to axial relationships, ceremonial movement, open views, and reciprocal vistas between Washington, D.C. and Arlington.

The APE also extends eastward across the Potomac River to include portions of the National Mall and associated parklands, including the Lincoln Memorial, Lincoln Memorial Cultural Landscape, West Potomac Park, East and West Potomac Park Historic District, Washington Monument and Grounds, the National Mall Historic District, Constitution Gardens, the World War II Memorial, the Martin Luther King, Jr. Memorial, the Franklin Delano Roosevelt Memorial, the Thomas Jefferson Memorial, the District of Columbia War Memorial, and other related resources. These properties are included because the proposed Arch may affect views from and towards the monumental core, particularly the designed visual relationship between the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, some portions of Arlington National Cemetery, and Arlington House.

The APE extends north and west into Arlington County and along the George Washington Memorial Parkway corridor to include properties such as Arlington Ridge Park, the Marine Corps War Memorial, the Netherlands Carillon, Fort Myer, the Pentagon, and other historic districts or individual historic properties within the mapped viewshed. These resources are included because of their proximity, elevation, visibility toward Memorial Circle, relationship to Arlington National Cemetery and Arlington House, and potential sensitivity to changes in setting, skyline, ceremonial context, and views across the Potomac River.

The APE further includes selected historic properties in the broader Washington, D.C. monumental core and adjacent neighborhoods, including portions of Georgetown, the Rock Creek and Potomac Parkway Historic District, the Old Naval Observatory, the White House, the U.S. Capitol, and other National Register-listed or National Historic Landmark properties identified within the study area. These properties are included to account for the height and visual prominence of the proposed Arch and the potential for effects that may occur at a distance through changes to views, vistas, skyline relationships, or the established visual character of the capital city.

To begin developing the APE for this project, the NPS referenced the APEs developed for other recent federal undertakings that involved major construction and physical prominence in the Potomac River basin, including the rehabilitation of the Arlington Memorial Bridge, the Rehabilitation of the Lincoln Memorial, the rehabilitation of the Tidal Basin and West Potomac Park seawalls, and the Long Bridge Project. Reviewing the APE development and consultation process for these prior projects informed the drafting of the initial APE for this project by identifying considerations and analysis raised in prior efforts that are germane to the current proposed undertaking. Additionally, it allowed the NPS to consider consulting party input on those prior APEs that may also be relevant to the APE of this project.

To establish preliminary boundaries for the APE, aerial imagery basemaps in ArcGIS Pro and Google Earth were used to identify the general extents of potential construction and visual

impacts. To inform the outer boundaries of the preliminary APE and identify critical study areas within it, the NPS analyzed photographs of important viewsheds, as well as architectural landscape renderings developed by the project's designers that overlay the proposed undertaking on those viewsheds. **Appendix H: Landscape Renderings** This analysis of APE outer extents considered areas of higher elevation (from which views would be more likely); major urban infrastructure (particularly elevated structures that would have greater potential to block views); and other urban conditions like building density, street patterns, tree coverage, and potential viewsheds.

The NPS then used existing cultural resources GIS tools to identify, map, and list cultural resources within the APE. The NPS consulted data from the Cultural Resources Inventory System (CRIS), the Virginia Cultural Resources Inventory System (VCRIS), and the National Register Information System including nomination documentation held at the National Archives. Once the APE was drafted, the impacted resources were gathered using a selection-by-location tool in ArcGIS Pro. This geoprocessing tool allows a user to select resources from one set of layers (in this case the data layers containing data for the National Register, National Historic Landmark, CRIS-CL, and CRIS-HS programs) using a defined spatial limit (in this case the preliminary boundary for the APE). APE was further refined through a viewshed analysis.

Viewshed Analysis

In response to comments from consulting parties, the NPS performed a viewshed analysis to identify historic properties that may have a view of the proposed undertaking, within a 3.5-mile radius of the proposed undertaking. The viewshed analysis was created to generate a list of historic properties that will require inclusion in the list of historic properties, due to the potential visibility of the proposed undertaking. Historic properties within the 3.5-mile study area that are shown in the viewshed analysis to have a potential view of the proposed undertaking have been incorporated into the updated list of historic properties and the APE.

Digital Surface Models (DSM) were used to conduct a viewshed analysis and create a viewshed map to show all locations from which the proposed undertaking may be visible, considering topography, vegetation, and structures. The results of the analysis do not guarantee all areas shown within the viewshed will have an unobstructed view of the proposed structure. The purpose of the analysis is to identify areas where visibility is possible to help focus efforts for further evaluation of viewpoints of concern. Some areas have limited data due to the elevation models available. In the Washington D.C. DSM, all data returns were removed from the dataset within the United States Secret Service redaction boundary except for ground points and water points.

Tree canopy data from Arlington County and Washington D.C. was used to remove portions of the resulting viewshed area that would otherwise represent viewpoints from the tops of trees. Some small areas at the edges of the tree canopy remain; however, these areas were not taken

into consideration when identifying historic properties that may have visibility to the proposed undertaking.

Viewshed Analysis Study Area

The extent to which the proposed undertaking is visible is constrained by the physiological limits of human sight. Visual impact assessments (VIAs) use distance zones to define the proximity of the viewer to an object. Federal Highway Administration VIA Guidelines use three distance zones, which are based on distance zones used by the U.S. Forest Service for scenic analysis: Foreground: 0.25 to 0.5 miles, Middle ground: 0.5 miles to 3-5 miles, and Background: 3-5 miles to the limit of visibility (FHWA, 2015).

The Initial Indirect Area of Potential Effect of this analysis includes the foreground and middle ground zones. In the background distance zone, the perceived mass and visibility of project elements are reduced and become a less substantial portion of the total landscape because detail is lost, thus, any available views beyond the middle ground would be greatly diminished. An extent of 3.5 miles was used for the study area (or middle ground) due to the landscape being an urban, built-up area with relatively flat terrain.

The National Register geospatial dataset was used to create an overlay of cultural resources that are listed on the National Register of Historic Places. The dataset was filtered based on resources within the 3.5-mile study area that were not already included in the list of historic properties, and those resources were coded for whether they overlap the viewshed area. The National Register dataset notes that features were created as part of a batch process from the National Register Information System, and accuracy needs to be confirmed individually. Data from the City of Washington D.C., Arlington County, and the City of Alexandria was used to verify locations and boundaries. Polygon data was used for all historic properties to create the overlay and identify potential visibility.

Whether a building includes some viewshed area is based on the elevations of the top surface of the structure which, in the case of most buildings, would be the roof but this could also include other types of top levels such as terraces or observation decks. Historic properties with viewpoints of concern should be verified as to whether there are actual observation points within the identified viewshed area or whether views from upper floor levels would have visibility of the proposed structure. **Appendix I: Revised APE Maps**

Historic Properties within the Project Area

The properties within the project area comprise a cohesive historic and commemorative landscape centered on Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, Lady Bird Johnson Park, and the entrance sequence to Arlington National Cemetery. These resources are significant because they collectively form the ceremonial connection between Washington, D.C. and Arlington, linking the Lincoln Memorial, Arlington Memorial Bridge, Memorial

Avenue, Arlington National Cemetery, and Arlington House through designed circulation, formal landscape features, commemorative objects, and contributing views and vistas.

The Memorial Avenue Corridor Cultural Landscape is a National Register-listed cultural landscape that includes memorials, statues, monuments, the Arlington Hemicycle and pylons, Arlington National Cemetery gates and gate pylons, vegetation, circulation features, and designed views. Its significance is tied to its role as the formal approach to Arlington National Cemetery and as a commemorative landscape that frames views toward the Washington Monument, Arlington House, the Lincoln Memorial, the Potomac River, the Capitol dome, and other monuments.

Arlington Memorial Bridge and related features are identified as contributing resources to the Memorial Avenue Corridor Cultural Landscape. The project area features include the Memorial Avenue Bridge/Boundary Channel Bridge, Memorial Circle pylons, Memorial Avenue and Memorial Circle circulation systems, pedestrian systems on the bridges and avenues, Boundary Channel, granite curbs and paving, cast-iron inlet grates, Washington standard lampposts, and related small-scale features. These elements are significant because they define the physical and symbolic connection between the Lincoln Memorial and Arlington National Cemetery.

The Lady Bird Johnson Park Cultural Landscape is also located within the project area and is identified as a NRHP listed property. NRHP cultural landscape. It includes Memorial Circle, portions of the George Washington Memorial Parkway, Lyndon B. Johnson Memorial Grove, Mount Vernon Memorial Highway, the Mount Vernon Trail, Columbia Island Marina, Boundary Channel, Columbia Lagoon, vegetation, buildings and structures, and small-scale features. Its significance is tied to its role as a designed park and parkway landscape that frames Memorial Circle and supports views toward the Lincoln Memorial, Arlington House, Arlington National Cemetery, the National Mall, the Potomac shoreline, and surrounding parklands.

Within and adjacent to the project area, the Arlington National Cemetery Historic District, Arlington House, and the Arlington House Cultural Landscape are important components of the same commemorative corridor. The cemetery includes contributing landscapes, circulation systems, gates, walls, drainage features, monuments, memorials, graves, small-scale features, and views to and from Arlington House, Memorial Bridge, the Lincoln Memorial, the D.C. shoreline, Fort Myer, the Netherlands Carillon, and the Washington Monument.

Overall, the project area should be understood as an integrated historic landscape rather than a collection of isolated resources. Its significance derives from the combined effect of its formal circulation, bridge and roadway infrastructure, memorials and monuments, designed vegetation, cemetery entrance features, parkland setting, and long-established visual relationships across the Potomac River. These character-defining features support the area's historic integrity of design, setting, feeling, association, and commemorative function. **Appendix J: List of Historic Properties within or Adjacent to the Project Area**

Historic Properties in the Area of Potential Effect

Additional resources that may be affected are those from which this proposed undertaking would be visible. The potential effects relate to possible changes to setting, viewsheds, and the broader spatial organization of the Potomac basin landscape. In particular, the Arch would introduce a new vertical feature into a landscape system historically characterized by carefully managed horizontal monumental compositions, open river-oriented views, and coordinated scenic parkway experiences. As a result, these resources were evaluated for effects related to visual prominence, altered landscape relationships, and changes to the historic character of the monumental river corridor.

The table includes a listing of historic districts, cultural landscapes, and archeological sites within the APE, which includes the project area, as well as contributing features and elements within them. The table also details the designation of the properties. **Appendix K: List of Historic Properties in the APE**

Archeological Resources

The NPS performed a Phase IA Archaeological Assessment for the proposed construction of a 250-foot monumental arch at Lady Bird Johnson Park, Washington, DC.

The Phase IA Archaeological Assessment was conducted to comport with Federal guidelines and meet the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. Pertinent legislation includes Sections 106 and 110 of the NHPA, the American Antiquities Act (AAA), the Archaeological Resources Protection Act (ARPA), the National Environmental Policy Act (NEPA), and the Native American Graves Protection and Repatriation Act (NAGPRA), as applicable.

Maryland's Medusa database records eight (8) archaeological sites located within a one-mile radius of the project area. Virginia's V-CRIS database identified thirteen (13) archaeological resources, one hundred and eighteen (118) individually identified above-ground architecture resources, and six (6) somewhat overlapping historic districts within a one-mile radius of the APE on the Virginia side of the Potomac River. The APE is also within the study area of the War of 1812 and within one mile of the Core Area for that battle. Archaeological sites within a one-mile radius of the APE include the Arlington House Site (44-AR-0017), which contributes to the NRHP listed Arlington House Historic District; two NHRP-eligible sites, the Arlington House Ravine (44-AR-0032) and Chaffee Place Site (44-AR-50); five (5) historic and precolonial sites, which have not been evaluated for eligibility; and six (6) sites that have been determined by Virginia's Division of Historic Resources to be ineligible for listing on the NRHP. Eighty-two (82) of the 118 individually identified above-ground resources are listed as associated with historic districts. These historic districts are the Arlington House Historic District (1 property), Fort Myer Historic District (28 properties), Arlington National Cemetery Historic District (34 properties), Pentagon Office Building Complex Historic Districts (4 properties), the Mount

Vernon Memorial Highway Historic District (2 properties), and the George Washington Memorial Parkway Historic District (14 properties), all of which are listed in the NRHP.

As of the date of this report, information provided by the DC HPO indicates that at least nine (9) archaeological sites have been encountered in broadly similar settings elsewhere in the District.

Phase IA archaeological assessment utilized a predictive model to determine the potential for precolonial and/or historic archaeological resources within the portion of the APE where ground disturbing activities would occur for the proposed undertaking. The predictive model synthesized information about known archaeological sites, past cultural resource surveys, environmental factors, known historic resources, and a pedestrian survey of the property. The results of geotechnical borings conducted within this portion of the APE are also considered as part of this predictive model.

Historic mapping and the preliminary geotechnical borings indicate that the portion of the APE where ground disturbing activities would occur is located on approximately 14-feet of fill. This fill, deposited between 1915 and 1927, caps an earlier landscape of alluvial deposits of sandy clay, likely laid down on sandbars or shallow tidal flats / floodplains during the late precolonial period or early historic period. Investigations in areas of fill have provided important information about Washington, DC's buried landscapes, ranging in age from roughly 10,000 BC to the colonial. The APE is located in an area that would have provided attractive resources during precolonial and early colonial periods. In the 18th century, when it was submerged, this portion of the APE was located in a shallow area between channels near the busy Georgetown Port. The Arlington House waterfront was also an important aspect of its 19th-century landscape.

As a result, Phase IA sensitivity assessment has characterized this portion of the APE as having moderate to high sensitivity for intact precolonial and/or historic archaeological resources. At present, the installation of H-Pile piers under the footings of the arch is anticipated to extend approximately 71 feet below grade to reach bedrock. The installation of a proposed sanitary sewer pump station is anticipated to reach approximately 15 feet below grade. A Phase IB subsurface archaeological investigation would be appropriate to determine the presence/absence of previously unrecorded significant archaeological resources within these portions of the APE which may be impacted by the proposed project. The NPS will conduct a Phase 1B assessment prior to the start of any construction activities.

Identification of Effects

Effects assessments are based on the criteria of adverse effect, 36 CFR § 800.5(a)(1), as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects can include physical destruction or damage to all or part of a property; alterations, including restoration, rehabilitation, and repair, that are inconsistent with the Secretary's Standards for the Treatment of Historic Properties and applicable guidelines; and change of the character of the property's use or of physical features within the property's setting that contribute to its significance (36 CFR § 800.5(a)(2)).

With an understanding of each historic property's significance, characteristics, and integrity, the criteria of adverse effect was applied. A finding of "no adverse effect," or "adverse effect" is recommended for each historic property:

- No Adverse Effect: A finding of "no adverse effect" means that effect(s) from the undertaking do not meet the Criteria of Adverse Effect in 36 CFR § 800.5(a)(1) .
- Adverse Effect: A finding of "adverse effect" means that effect(s) of the undertaking meet the Criteria of Adverse Effect in 36 CFR § 800.5(a)(1) .

The following analysis is an assessment of effects of the undertaking on historic properties within the APE and is based upon the criteria of adverse effect.

Effects Analysis

The undertaking would adversely affect several historic properties within the APE through changes in spatial organization, land use, setting, vegetation, and views and vistas. **Appendix L: Assessment of Adverse Effects.**

The undertaking would alter the characteristics that qualify identified historic properties for listing in the NRHP. The analysis considered effects, including physical changes, visual effects, changes to setting and context, impacts to contributing views and vistas, changes to circulation and spatial organization, construction-related effects, and nighttime visual effects associated with illumination. The analysis determined that adverse effects would occur where the proposed undertaking would introduce a new, visually prominent vertical feature into significant designed views, commemorative landscapes, cultural landscapes, and historic settings.

The most substantial adverse effects are concentrated in the Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, Arlington House, and Lincoln Memorial corridor. Within this area, the undertaking would alter the character, setting, and design continuity of a nationally significant commemorative landscape whose significance is defined by axial relationships, formal circulation patterns, designed views, and symbolic connections between Washington, D.C. and Arlington. The proposed undertaking would be prominently visible within the Memorial Avenue Corridor Cultural Landscape and would alter views toward the Washington Monument, Arlington House, the Lincoln Memorial, the Capitol dome, and other elements of the monumental core. The undertaking would also affect Memorial Circle circulation, contributing landscape features, and the visual continuity of the Arlington Memorial Bridge and Memorial Avenue composition.

The undertaking would adversely affect several National Mall and monumental-core resources, including the Lincoln Memorial Cultural Landscape, Lincoln Memorial, National Mall Site and National Mall Historic District, The Mall Cultural Landscape, Washington Monument, Washington Monument and Grounds Historic District, and Washington Monument and Grounds Cultural Landscape. These effects are primarily visual and spatial and would result from changes to reciprocal views, axial relationships, and long-distance views across the Potomac River. The analysis recognizes that these properties derive significance from designed orientations, formal planning relationships, commemorative use, and the balance of natural and built features within the monumental landscape.

Additional adverse effects were determined for historic properties where the undertaking would be visible within significant viewsheds or would alter setting, context, or nighttime visual character. These include, among others, the East and West Potomac Park Historic District, L'Enfant Plan of the City of Washington, Arlington Ridge Park, Pentagon, Fort Myer NHL District, George Mason Memorial, Thomas Jefferson Memorial, Thomas Jefferson Memorial Cultural Landscape, United States Capitol, Georgetown Historic District, Old Naval Observatory, Observatory Hill Historic District, Key Bridge, National Cathedral, National War College, and selected other properties where visibility or changes to contributing views would diminish character-defining features.

Archeological Resources

With regard to archeological resources, additional investigation is needed to fully determine the effects of the undertaking. A subsurface investigation of Memorial Circle is necessary to determine the presence or absence of deeply buried resources, and a survey of the potential utility corridor locations may be needed to identify resources within those areas. The results of these investigations will be used to determine whether the portion of the APE that would have ground disturbing activities contains archeological resources that are eligible, or may be eligible, for listing in the NRHP, and whether the proposed undertaking will have adverse effects on these resources. A programmatic agreement will be developed for this project to define the continued

consultation process for the identification and evaluation of resources, and the resolution of any adverse effects on NRHP-eligible archeological resources.

Overall, the undertaking would result in adverse effects to historic properties where it would alter significant views, vistas, designed spatial relationships, commemorative axes, cultural landscape features, circulation patterns, setting, feeling, association, or nighttime visual character.

Avoidance, Minimization, and Mitigation Measures

The NPS has worked to avoid or resolve the adverse effects to historic properties by developing and evaluating alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects.

Avoidance

During and prior to the design process, various smaller Arch heights were evaluated to avoid, minimize, or mitigate impacts on historic properties, including NHLs. The smaller Arch heights were ultimately dismissed because they would have had greater impact on the cultural landscapes, specifically the views between the Lincoln Memorial and Arlington National Cemetery. The smaller designs fully obstructed this view, instead of framing it, and did not create any new viewing opportunities, by contrast to the proposed Arch, which would allow a less obstructed view through its central opening and provide new viewing opportunities. In addition, because the Arch is intended to celebrate 250 years of American independence, the smaller heights were not considered representative of this milestone, unlike the 250-foot Arch proposed in the undertaking.

Avoidance of adverse effects through relocation was not carried forward because the undertaking is inherently location dependent. The proposed Triumphal Arch is not being advanced as a feature that could be placed at any central or prominent location within Washington, D.C. or Virginia. Rather, the undertaking is grounded in the historic planning and design intent for the Arlington Memorial Bridge, Memorial Avenue, Columbia Island, and Memorial Circle. The 1924 Report of the Arlington Memorial Bridge Commission contemplated monumental vertical elements at Columbia Island/Memorial Circle in association with the western terminus of Arlington Memorial Bridge and the ceremonial approach to Arlington National Cemetery. Those vertical features were intended to frame and mark the transition between Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, and the entrance sequence to Arlington National Cemetery. As a result, the proposed location is central to the purpose of the undertaking and is not interchangeable with another site.

Because the purpose of the undertaking is to respond to and complete a historically contemplated commemorative feature at Memorial Circle, alternative locations outside Memorial Circle would not meet the project's location-specific objective. Other sites may avoid or reduce some of the adverse effects associated with introducing a new monumental structure at Memorial Circle; however, relocation would also sever the project from the specific historic planning precedent that provides the rationale for the undertaking. A relocated arch elsewhere in Washington, D.C. or Virginia would constitute a materially different commemorative project rather than an alternative that fulfills the same purpose. For this reason, alternative locations outside Memorial Circle are not reasonable avoidance alternatives.

Avoidance through eliminating the proposed vertical commemorative feature was also not consistent with the undertaking's purpose. Over several decades, the Commission of Fine Arts reviewed concepts for Memorial Circle that included a major formal civic composition, including an elliptical plaza, cross-axes, monumental pavilions, and two columns representing national reunion. Although later design revisions reduced the scale of those earlier concepts and ultimately replaced the proposed monumental columns with smaller sculptural pavilions, the original vision of a major commemorative feature anchoring Memorial Circle was never fully realized. The proposed Triumphal Arch is intended to continue that historic design lineage by introducing a focal point at the location historically associated with a more prominent commemorative treatment. A no-build or non-monumental landscape treatment would avoid certain adverse effects, but it would not accomplish the undertaking's core purpose of completing the historically contemplated civic and commemorative role of Memorial Circle.

The NPS recognizes that the selected location contributes to the undertaking's adverse effects because Memorial Circle is part of a highly sensitive historic and commemorative landscape. The site is visually and spatially connected to Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, the Lincoln Memorial, the National Mall, and other historic properties whose significance is tied to setting, feeling, association, design, and views. However, the same characteristics that make Memorial Circle sensitive from a preservation perspective are also the characteristics that make it the historically appropriate location for the undertaking. The project's effects therefore could not be fully avoided without either relocating the Arch away from the historically identified site or eliminating the principal commemorative feature, both of which would fail to meet the undertaking's purpose and need.

The NPS also considered the relationship of the undertaking to the George Washington Memorial Parkway and the broader Potomac River commemorative landscape. Placement of the Arch within the Parkway is consistent with the Parkway's purpose as a scenic roadway and commemorative landscape honoring national ideals and protecting the cultural and natural resources that frame the Potomac River corridor. The Arch would provide a new destination for learning, contemplation, and sightseeing, and would offer visitors an elevated vantage point from which to experience the Potomac River, Memorial Circle, Arlington Memorial Bridge, Arlington National Cemetery, and the surrounding monumental landscape. The undertaking also includes circulation and pedestrian-access improvements intended to improve visitor safety, comfort, and access within the existing transportation setting.

Accordingly, the NPS determined that adverse effects could not be fully avoided while still meeting the undertaking's location-dependent purpose. The NPS will therefore focus on measures to minimize and mitigate adverse effects within the constraints of the selected location and design. These measures may include design refinement where feasible, lighting controls, compatible materials and finishes, reduction of visual clutter, construction-period protections, archaeological identification and treatment, documentation of affected historic properties and

viewsheds, interpretation, landscape restoration, visitor-orientation improvements, and other commitments developed through consultation. These measures would not eliminate all adverse effects, but they would reduce, manage, document, or mitigate effects while retaining the location and commemorative function that are central to the undertaking.

Minimization and Mitigation

Mitigation measures that document, interpret, or compensate for adverse effects after they occur do not negate an adverse effect finding. However, the NPS has identified conditions and future actions to minimize or mitigate adverse effects, including lighting controls, material and finish refinements, reduction of visual clutter, construction-period protection measures, vibration and noise controls, archaeological investigations and monitoring, viewshed and cultural landscape documentation, interpretation, landscape restoration, visitor wayfinding, and other commitments to be developed through consultation. Where additional information is needed, including for archaeological resources or final utility alignments, the NPS will complete further identification and evaluation before ground disturbance and will consult on appropriate treatment measures if historic properties may be affected.

Potential minimization and mitigation measures for the project's adverse effects that could be considered during the development of a Memorandum of Agreement (MOA):

1. Construction Management Control

- **Develop and implement a vibration monitoring plan** - Install vibration monitors near Arlington Memorial Bridge and other historic structures, bridge approaches, historic stonework, pylons, retaining walls, and other sensitive resources. Establish thresholds requiring work modification or stoppage if vibration exceeds approved limits.
- **Screening of Construction Areas** - Use neutral, visually recessive screening to reduce temporary visual effects from construction fencing, equipment, trailers, stockpiles, and staging areas.
- **Control Temporary Lighting** - Limit construction lighting to the minimum necessary, direct it downward, shield it, and prohibit unnecessary nighttime lighting that would affect historic views or cemetery solemnity.
- **Construction Noise Control Plan** - Establish enforceable limits, monitoring, notification, and work restrictions for noise-generating activities. Would include the use of sound barriers or acoustic blankets, locate generators where noise is reduced, coordinate with Arlington National Cemetery, and limits nighttime work.
- **Ceremonial Route Protection Plan** - Coordinate with Arlington National Cemetery to avoid disruptive construction activities during funerals, wreath ceremonies, major commemorative events, and ceremonial movements.

- **Work-hour limitations** - Restrict work hours for high-noise, high-vibration, or highly visible construction activities to minimize effects on visitor experience and ceremonial use of historic properties.
- **Pedestrian and visitor access protection** - Maintain safe, legible pedestrian routes to Arlington Memorial Bridge, Memorial Avenue, LBJ Park, Arlington National Cemetery, and nearby memorials during construction.
- **Construction Management Plan** - Require a Construction Management Plan to minimize construction-period effects to historic properties, adjacent resources, traffic circulation, visitor access, and the surrounding commemorative landscape. The plan would address traffic control, sediment and erosion controls, laydown-area limits and restoration, off-site fabrication to reduce on-site activity, limited worker parking with use of Metro or remote parking, enclosed workforce break areas, self-contained restroom facilities, vibration and movement monitoring for adjacent structures, coordination of pile-driving and other disruptive activities around planned events, use of a fixed tower crane to reduce street impacts, and off-site fabrication of arch cladding to minimize truck trips, equipment, labor, and laydown needs at the project site.
- **Construction Dust Control Plan** - Fugitive emission sources include the transfer of sand and aggregate, truck loading, mixer loading, vehicle traffic, and wind erosion from sand and aggregate stockpiles. The amount of fugitive emissions generated during the transfer of sand and aggregate depends primarily on the surface moisture content of these materials. Wetting materials prior to moving or if dust is being generated reduces air emissions that then become sediment that falls into surrounding waterways.
- **Maintain Construction Site and Staging Area BMPs for Wildlife/IPM** - All trash receptacles must be lidded and emptied regularly to avoid attracting wildlife. Trailer crawl spaces should be screened to avoid wildlife utilizing them. Doors should be fitted, remain closed when not in use, and maintain sweeps to avoid rodent infiltration.

2. Archeological Investigation

- **Implement Archaeological Identification, Protection, Monitoring, and Treatment Measures** – complete additional archaeological identification, evaluation, monitoring, and treatment prior to and during ground disturbance. Measures would include review of final design and utility routes for archaeological sensitivity; preparation of an Archaeological Work Plan; completion of Phase IB, geoarchaeological, or other investigations where warranted; avoidance of significant archaeological resources where feasible; preparation of an Archaeological Treatment Plan or Data Recovery Plan if avoidance is not feasible; archaeological monitoring during excavation, foundation work, and utility installation; stop-work and notification procedures for unanticipated discoveries; specific protocols for human remains and culturally sensitive materials;

contractor cultural-resource training; and final reporting, analysis, and curation of recovered materials and records. This could include the following:

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

4. Park Improvements

- **Rehabilitate Memorial Avenue historic landscape** - Rehabilitate contributing landscape features along Memorial Avenue to reinforce its historic role as the ceremonial approach between Arlington Memorial Bridge and Arlington National Cemetery. Improvements could include restoration of turf panels, medians, walkways, curbs, planting patterns, tree canopy, lighting, and other character-defining landscape features that contribute to the formal procession from the bridge to the cemetery. Work would be designed to preserve the corridor's axial organization, solemn character, and commemorative function while improving landscape condition, pedestrian safety, and long-term maintainability.
- **Restore or enhance Arlington Memorial Bridge approach landscapes** – Restore or enhance the designed landscapes at the approaches to Arlington Memorial Bridge to improve the integrity of associated historic landscape features and strengthen the visual and ceremonial relationship between the Lincoln Memorial, the Arlington Memorial Bridge, Memorial Circle, and Memorial Avenue. Improvements could include repair or replacement in kind of damaged paving, curbs, walls, planting areas, lawn panels, and other contributing features; removal or consolidation of non-historic visual clutter; and rehabilitation of landscape areas disturbed by construction, staging, utilities, or circulation changes. These measures would be implemented using materials, planting treatments, and design details compatible with the historic bridge setting.
- **Improve visitor wayfinding and pedestrian orientation** - Improve visitor wayfinding between Memorial Avenue, Arlington National Cemetery, Arlington House, nearby transit facilities, and associated pedestrian routes to reduce confusion, improve safety, and minimize conflicts among visitors, vehicles, funeral processions, and daily cemetery operations. Wayfinding improvements could include coordinated directional signage, pavement markings, accessible route information, maps, digital tools, and discreet

interpretive orientation at key decision points. All wayfinding elements would be designed to be visually compatible with the historic setting, avoid unnecessary sign clutter, and support movement through the corridor without diminishing the solemn and ceremonial character of Memorial Avenue and Arlington National Cemetery.

5. Documentation

- **Prepare Historic American Landscapes Survey (HALS) documentation for Memorial Circle and the Memorial Avenue corridor** - Prepare HALS documentation for Memorial Circle, Memorial Avenue, and associated designed landscape features to create a permanent record of the corridor prior to project implementation. The documentation would address the corridor's historic development, spatial organization, circulation patterns, planting structure, lawn panels, views and vistas, small-scale features, and relationship to Arlington Memorial Bridge, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, and the Lincoln Memorial. Documentation would include large-format photography, written historical narrative, existing-condition plans, and other materials meeting applicable HALS standards.
- **Prepare Historic American Building Survey (HABS)/HALS documentation for affected designed landscapes and views** - Prepare appropriate HABS and/or HALS documentation for affected historic properties, designed landscapes, and significant views that may experience adverse visual, spatial, or setting-related effects. This documentation would record character-defining features, designed views, circulation relationships, landscape composition, and the physical and visual connections among the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, Arlington House, and adjacent parklands. The documentation would supplement existing National Register or National Historic Landmark documentation where current records do not fully describe viewsheds, spatial relationships, or cultural landscape significance.
- **Complete historic viewshed documentation** - Prepare a systematic photographic and narrative record of existing views and vistas within the cross-Potomac commemorative corridor. The documentation would include key viewpoints from the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, Fort Myer, and other locations identified through consultation. Photography would be completed in leaf-on and leaf-off conditions, during daytime and nighttime conditions, and, where feasible, during ceremonial or high-use conditions to document how the corridor is experienced in different seasonal, lighting, and operational contexts. The final record would identify the viewpoint, date, time, lens information, field of view, direction, and historic significance of each view.

- **Develop a 3D digital model and LiDAR record of the corridor** - Prepare a three-dimensional digital documentation package, which may include LiDAR scanning, photogrammetry, GIS-based viewshed modeling, or other digital survey methods, to create a permanent record of pre-project spatial relationships and existing conditions. The model would document the relationship among Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, Arlington House, Lady Bird Johnson Park, and the Lincoln Memorial, including topography, circulation, landscape features, and key sightlines. The digital record could be used for archival purposes, future preservation planning, public interpretation, and comparison with post-construction conditions.
- **Prepare archival-quality drone and ground photography** - Complete archival-quality aerial and ground-based photography to document existing views, landscape organization, circulation patterns, and cultural landscape relationships before construction. Drone photography would be used where permitted and appropriate to capture the spatial relationship of the corridor from above, including the alignment from the Lincoln Memorial across Arlington Memorial Bridge to Memorial Circle, Memorial Avenue, Arlington National Cemetery, and Arlington House. Ground photography would document the visitor-level experience from key public viewpoints and ceremonial routes. All photography would be catalogued and retained as part of the project's permanent mitigation record.
- **Conduct oral histories related to the commemorative corridor** - Develop an oral history program to document the meaning, use, and public significance of the Lincoln Memorial–Arlington House commemorative corridor. Interviewees could include historians, veterans, preservation professionals, Arlington National Cemetery families, representatives of veterans' organizations, NPS staff, Arlington National Cemetery staff, landscape architects, design experts, and others with knowledge of the corridor's history, symbolism, and contemporary use. Oral histories would address the meaning of the visual axis, the ceremonial role of Memorial Avenue and Arlington Memorial Bridge, the experience of visiting Arlington National Cemetery and Arlington House, and the evolution of the corridor as a commemorative landscape. Transcripts and recordings would be archived and, where appropriate, made available for interpretation, research, or public education.
- **Develop a history of the creation of Lady Bird Johnson Park** - Prepare a focused historical study documenting the creation, design, naming, development, and evolution of Lady Bird Johnson Park within the broader Columbia Island and Memorial Circle landscape. The study would address the park's relationship to Arlington Memorial Bridge, the George Washington Memorial Parkway, Memorial Circle, the Potomac River, and the commemorative landscape connecting Washington, D.C. and Arlington. The history would also examine the park's landscape design, plantings, circulation, commemorative associations, environmental setting, and role as a visual and physical

frame for Memorial Circle. The final product could support future management, interpretation, National Register documentation, and cultural landscape treatment recommendations.

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

6. Interpretation

- **Develop an interpretive program on the Lincoln Memorial–Arlington House axis** - Develop an interpretive program explaining the historic, symbolic, and commemorative relationship among the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House. The program would address the corridor's design intent, its association with national unity and reconciliation, its role as a ceremonial connection between Washington, D.C. and Arlington, and the ways in which the landscape has evolved over time. Interpretation could be delivered through ranger-led programs, digital media, waysides, printed materials, and educational content.
- **Develop a digital interactive or wayside viewshed exhibit**- Create an interactive digital exhibit, wayside exhibit, or combination of both that allows visitors to compare historic, existing, and post-project views within the commemorative corridor. The exhibit would help visitors understand how views across the Potomac River have changed over time and how the monumental core evolved through successive periods of planning, design, commemoration, transportation development, landscape change, and federal stewardship. The exhibit could include historic maps, plans, photographs, visual simulations, annotated viewsheds, and layered “then-and-now” comparisons.
- **Install interpretive waysides at Memorial Circle and Memorial Avenue** - Install a limited number of compatible interpretive waysides at Memorial Circle and along Memorial Avenue to explain the design history and significance of Memorial Circle, Columbia Island, Arlington Memorial Bridge, Memorial Avenue, and the McMillan-era commemorative landscape. The waysides would describe the corridor's role as a formal ceremonial approach, its relationship to Arlington National Cemetery and Arlington House, and its connection to the Lincoln Memorial and National Mall. The signs would

be designed to be visually compatible with the historic setting and located to avoid sign clutter or interference with character-defining views.

- **Develop an NPS webpage on the development and significance of the cross-Potomac commemorative corridor** - Develop a publicly accessible webpage describing the development of Lady Bird Johnson Park, the Lincoln Memorial, Arlington National Cemetery, Arlington House, Arlington Memorial Bridge, Memorial Avenue, and the scenic and symbolic connections among these resources. The webpage would provide historical context for the corridor, explain its commemorative and landscape significance, and present historic plans, photographs, maps, and interpretive narratives showing how the corridor has changed over time. The webpage could also serve as a central repository for related interpretive materials, historic documentation, and links to digital exhibits.
- **Develop a webpage on the history and significance of triumphal arches** - Develop an interpretive webpage explaining the history, symbolism, and evolution of triumphal arches as monumental forms. The webpage would address the origins and use of triumphal arches in different historical and cultural contexts, their association with military victory, civic identity, national celebration, and public memory, and how the proposed Arch relates to or differs from those traditions. The webpage could also discuss how monumental forms are evaluated within historic landscapes and how new memorials become part of an evolving public landscape.
- **Display archaeological materials recovered from project-related investigations where appropriate** - Develop a curated display of archaeological materials recovered from the Arch project and other related improvement projects, where appropriate and consistent with applicable laws, curation standards, and consultation outcomes. The display could be located within a climate-controlled public or interpretive space in the base of the Arch and would present recovered materials in a manner that explains their historical context, research value, and relationship to the development of Columbia Island, Lady Bird Johnson Park, Memorial Circle, and the Potomac River landscape. Sensitive materials, including human remains, funerary objects, sacred objects, or culturally sensitive items, would not be displayed unless expressly appropriate and consistent with applicable consultation and legal requirements.
- **Develop an exhibit on archaeological investigations, made land, and landfilling** - Develop an exhibit explaining the archaeological investigation process, the importance of made land surfaces, and the engineering history of landfilling in the development of Lady Bird Johnson Park and Washington, D.C. The exhibit would describe how archaeologists identify buried landforms, former shorelines, fill episodes, historic deposits, and other subsurface evidence of landscape change. It would also

explain the broader role of land reclamation, dredging, filling, and shoreline modification in the growth of the capital city and the creation of parkland along the Potomac River.

- **Install QR-code interpretation on maritime activity along the Potomac River** – Develop discreet signage with a QR code linking to information about maritime activity along the Potomac River, particularly in relation to Washington, D.C., Arlington, Columbia Island, and the development of the river corridor. The digital content could address navigation, commerce, military activity, ferry crossings, bridges, shoreline change, dredging, landfilling, stormwater management and related water quality, and the transformation of the Potomac from a working river landscape into a monumental, recreational, and ceremonial setting.
- **Install interpretation on Native peoples and the Potomac River** - Develop interpretive signage, digital content, or both, addressing Native peoples with ancestral connections to the Potomac River and surrounding landscape. The interpretation would explain the importance of the river for travel, trade, subsistence, settlement, and cultural life before and during early colonial contact. This content would be developed in consultation with affiliated Tribes to ensure that the interpretation is accurate, respectful, and appropriate, and that it reflects Tribal perspectives where Tribes wish to provide them.
- **Install signage and QR-code interpretation on affected scenic viewsheds and vistas** - Develop a coordinated set of interpretive signs and QR-code-linked digital materials explaining the scenic viewsheds and vistas affected by the proposed project. The interpretation would identify key views, explain their original design intent and historic significance, and describe how the Arch fits within the continued evolution of Washington, D.C.'s memorial landscape and public commemoration. The signs would be limited in number, carefully sited, and designed to avoid adding visual clutter to sensitive historic views.
 - **Lincoln Memorial viewshed:** Interpretation would explain the view from the Lincoln Memorial toward Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House, including the symbolic association of this cross-Potomac axis with national unity, reconciliation, and remembrance.
 - **Arlington National Cemetery viewshed:** Interpretation would describe views from cemetery approaches, Memorial Avenue, Arlington House, and other appropriate vantage points toward the Lincoln Memorial and the monumental core, emphasizing the ceremonial and commemorative role of the corridor.
 - **Lady Bird Johnson Park:** Interpretation would explain the creation, design, naming, and evolution of Lady Bird Johnson Park, including its relationship to Columbia Island,

Memorial Circle, Arlington Memorial Bridge, the George Washington Memorial Parkway, and the Potomac River landscape.

- **Mount Vernon Trail / regional trail connections:** Interpretation would explain relevant trail connections, pedestrian routes, and recreational corridors within the broader commemorative landscape, including their relationship to the Potomac River, park development, and public access.
- **Digital map stories and QR-code content:** QR codes could link to map-based stories showing the development of each location over time, including historic plans, photographs, aerial imagery, design drawings, National Register documentation, and changes in views, circulation, landform, vegetation, and commemorative use.

Compliance with Section 110(f)

The APE includes National Historic Landmarks and the Assessment of Effects identifies adverse effects to certain NHLs, the NPS has addressed the heightened requirements of Section 110(f) of the NHPA, which requires federal agencies, to the maximum extent possible, to undertake planning and actions necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking.

The NPS has determined that the purpose and need for the undertaking require the proposed Arch to be located at Memorial Circle. As explained above, the NPS considered various measures to avoid or minimize impacts to NHLs, including smaller Arch heights, relocation, no-build, or elimination of the proposed vertical commemorative feature but these alternatives were not carried forward because they would either have greater impacts to historic properties or would not meet the location-dependent purpose of the undertaking. In particular, relocating the Arch outside Memorial Circle would avoid some adverse effects, but it would also sever the undertaking from the historic planning precedent that provides the rationale for the project. For that reason, the NPS determined that avoidance through relocation would constitute a materially different undertaking rather than a reasonable avoidance measure for this undertaking.

Accordingly, the NPS's efforts to minimize harm to NHLs has focused on measures that can reduce, manage, or mitigate adverse effects while retaining the proposed location and design, including viewshed documentation, cultural landscape documentation, construction-period protections, archaeological investigations, interpretive measures, landscape restoration, visitor wayfinding, and other treatment or mitigation commitments tied directly to the affected NHLs. The NPS identified NHLs within the APE. The list of NHLs within the APE is below.

The NPS also assessed whether the proposed undertaking would directly and adversely affect all NHLs within the APE. The analysis recognized that the significance of many of these properties is tied not only to individual buildings or structures, but also to their setting, views, vistas, ceremonial approaches, designed landscapes, and relationships to the National Mall, Potomac River, Arlington National Cemetery, Arlington House, and the monumental core. The effects

analysis determined that adverse effects to NHLs would generally result from visual, spatial, and nighttime changes rather than direct physical alteration. In particular, the analysis identified adverse effects where the proposed Arch would be visible within significant viewsheds or would alter contributing views, vistas, setting, feeling, association, or nighttime visual character.

Because adverse effects on all NHLs within the APE could not be fully avoided while still meeting the undertaking's purpose and need, the NPS focused on minimization and mitigation measures that could reduce, manage, document, or compensate for harm to NHLs and other historic properties. These measures, discussed above, include lighting controls to reduce nighttime visual effects; construction-period protection measures; vibration, noise, access, and traffic controls; archaeological identification, evaluation, and treatment; documentation of affected historic properties and cultural landscapes; viewshed documentation; interpretation of the Memorial Circle, Arlington Memorial Bridge, Memorial Avenue, and cross-Potomac commemorative corridor; landscape restoration; and visitor-orientation and pedestrian-safety improvements.

The NPS also provided the Advisory Council on Historic Preservation, SHPOs, the Secretary of the Interior's representative/NHL Program, and consulting parties an opportunity to review and comment on the undertaking, the APE, the identification of historic properties, the previous assessment of effects, and proposed measures to resolve adverse effects. Through this process, the NPS considered comments regarding the extent of the APE, NHL identification, the adequacy of the viewshed analysis, potential effects to contributing views, the availability of avoidance alternatives, and the sufficiency of proposed minimization and mitigation measures.

The effects analysis identifies 31 NHL-designated properties in the APE and assesses 6 of those NHLs as having adverse effects, and 25 NHLs as having no adverse effects, as set forth in the table below.

NHL	Assessment of Effect
Andrew Rankin Memorial Chapel, Frederick Douglass Memorial Hall, Founders Library	No Adverse Effect
Arts and Industries Building	No Adverse Effect
Ashburton House	No Adverse Effect
Baker, Newton D., House	No Adverse Effect
Bayly, Mountjoy, House	No Adverse Effect
City Hall	No Adverse Effect
Constitution Hall	No Adverse Effect
Davidson Building	No Adverse Effect

NHL	Assessment of Effect
Fort Myer NHL District	Although not expected to be prominently visible throughout the resource, the undertaking would be visible in some conditions from Buffalo Soldier Avenue and the open field west of McNair Road. The analysis also notes that the undertaking would be illuminated and visible at night, resulting in adverse effects.
Founders Library	No Adverse Effect
Georgetown Historic District	The undertaking would be visible from multiple locations within the historic district and would alter waterfront views that define the resource.
Healy Building, Georgetown University	No Adverse Effect
Hughes, Charles Evans, House	No Adverse Effect
Lafayette Building	No Adverse Effect
Lafayette Square Historic District	No Adverse Effect
Memorial Continental Hall	No Adverse Effect
National War College	The analysis identifies distant views that would include the proposed undertaking and states that these views may introduce an adverse effect to the property.
Old Naval Observatory	The undertaking would be visible from the grounds and upper levels of the building. The analysis states that it would adversely affect contributing views, including reciprocal views with Arlington National Cemetery, and that nighttime views would include the illuminated undertaking.
Pension Building	No Adverse Effect
Pentagon	The undertaking would be visible from contributing views to and from Washington, D.C., including the east and north terraces. The analysis notes that the Pentagon's northeastern and eastern facades, River Entrance Terrace, Mall Entrance Terrace, parade ground, and landscaping are designed to interface with views of the Monumental Core, and the proposed undertaking would be constructed within that contributing viewshed. Nighttime illumination is also identified as part of the adverse effect.
Quarters 1, Fort Myer	No Adverse Effect

NHL	Assessment of Effect
Sewall-Belmont House National Historic Site	No Adverse Effect
Smithsonian Building	No Adverse Effect
St. John's Church	No Adverse Effect
Supreme Court Building	No Adverse Effect
Tudor Place	No Adverse Effect
United Mine Workers of America	No Adverse Effect
United States Capitol	The undertaking would be visible from the upper stories of the Capitol, altering contributing views. The analysis also identifies nighttime illumination as contributing to the adverse effect.
White House	No Adverse Effect
Wilson, Woodrow, House	No Adverse Effect
Windsor Lodge	No Adverse Effect

The adverse-effect findings for NHLs are driven primarily by visual, spatial, and nighttime effects, rather than direct physical alteration. The affected NHLs are generally those with identified contributing views toward the Monumental Core, the Potomac River corridor, Arlington National Cemetery, or Washington, D.C.'s symbolic landscape. The analysis treats the Arch's height, visibility, and illumination as the basis for adverse effects where those changes would alter contributing views, vistas, setting, feeling, or association.

For NHLs assessed as no adverse effect, the analysis generally relies on one or more of the following rationales: the undertaking would not be visible from the resource; visibility would be limited to rooftops or upper stories; views are not identified as contributing; or intervening buildings, vegetation, distance, or orientation would prevent the undertaking from diminishing the property's qualifying characteristics. For example, Quarters 1, Fort Myer was determined no adverse effect because the undertaking would not be visible, while the Smithsonian Building and White House are also assessed as no adverse effect because the undertaking would not be visible from those resources.

Accordingly, the NPS given heightened consideration to NHLs; identifying NHLs within the APE; assessing adverse effects to NHLs based on the characteristics that qualify them for designation; evaluating whether harm could be avoided; explaining why relocation or no-build alternatives would not meet the undertaking's location-dependent purpose; consulting with the ACHP, SHPOs, NHL Program, and consulting parties; and developing planning actions to minimize harm to NHLs to the maximum extent possible within the constraints of the undertaking. While the NPS acknowledges that the proposed undertaking would result in adverse effects to certain NHLs, Section 110(f) does not require that all harm be eliminated where avoidance would defeat the purpose of the undertaking. Rather, it requires the agency to undertake planning and actions necessary to minimize harm to the maximum extent possible,

which the NPS has done through identification, evaluation, consultation, consideration of avoidance, and development of minimization and mitigation measures, and will continue to do through continued consultation.

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Appendix A – Consulting Parties

These parties are marked with a single asterisk were invited to participate on June 5, 2026. Other stakeholders and interested parties were invited to participate in consultation per 36 CFR §§ 800.2(c)(5) and 800.3(f)(2) on or following July 10, 2026 and those are marked with a double asterisk.

Consulting Parties

- District of Columbia Historic Preservation Office*
- Virginia Department of Historic Resources*
- Advisory Council on Historic Preservation*
- Absentee Shawnee Tribe of Indians of Oklahoma Nation
- Catawba Indian Nation*
- Chickahominy Indian Tribe*
- Chickahominy Tribe Eastern Division*
- Delaware Nation*
- Monacan Indian Nation*
- Nansemond Indian Nation*
- Pamunkey Indian Tribe*
- Rappahannock Tribe*
- Shawnee Tribe*
- Upper Mattaponi Indian Tribe*
- National Capital Planning Commission*
- Commission of Fine Arts*
- Arlington County*
- District of Columbia – Ward 2*
- Arlington National Cemetery*
- Department of War*
- The Trump-Kennedy Center*
- National Park Service - National Mall and Memorial Parks*
- National Park Service - Rock Creek Park*
- National Park Service – National Capital Region National Historic Landscape Program*
- Federal Highway Administration*
- Architect of the Capitol*
- Georgetown 2E ANC Commission*
- National Trust for Historic Preservation**
- Committee of 100 on the Federal City**
- DC Preservation League**

- The Cultural Landscape Foundation**
- National Parks Conservation Association**
- American Institute of Architects**
- Veterans and Defense Affairs for the Commonwealth of Virginia**
- Preservation Virginia**
- Virginia Museum of History and Culture**
- Arlington Historical Society **
- Friends of Joint Base Myer-Henderson Hall**
- Pentagon Memorial Foundation**
- Virginia Department of Veterans Services**
- Veterans of Foreign Wars – National Organization**
- The American Legion – National Organization**
- Family Circle of Descendants at Arlington House**
- America's Gold Star Families**

Appendix B – June 5 – July 15 Public Comment Summary

(see separate document)

Appendix C – July 10 – July 30 Public Comment Summary Addendum

(see separate document)

Appendix D - July 10 – July 19 Consulting Party Comment Summary

Issue / topic	DC SHPO	Virginia DHR	WHS / DoW	Arlington HPP	NPCA	TCLF	Arlington Historical Society	AIA DC	Committee of 100	National Mall Coalition	National Trust
Consulting party status / participation	Supports granting status to additional organizations; asks opportunities for parties and public to remain open until consultation concludes.	Responds as SHPO; reminds NPS that federal agency, not SHPO, must make reasonable/good-faith identification effort.	Requests consulting party status; states Sarah Koepfel is correct POC.	Provides local historic preservation program comments on APE, effects, and archaeological resources.	Accepts consulting party status but states process to date has been inadequate.	Accepts status; objects that initial meeting occurred before TCLF and other organizations were invited; asks whether more meetings will occur.	Provides historical consultation through article; supports careful review through established federal, state, and local processes.	Accepts opportunity to participate and looks forward to constructive consultation.	Accepts consulting party status; states views should not be treated as concurrence.	Accepts consulting party status; associates with Committee of 100 comments.	Accepts consulting party role; appreciates broader public comment reopening but finds materials legally insufficient.
Timing / adequacy of Section 106 process	States public and consulting party comment opportunities should remain open until consultation concludes.	Requests opportunity to review GIS modeling and viewshed basis before accepting APE approach.	No additional process comments beyond request to participate.	Notes need for additional study before effects can be fully understood.	Objects that consultation began late, after FONSI and NCPC preliminary approval; asks deadline be extended at least 30 days and not close before public comment.	States consultation began after CFA final design review; July 30 letter asks how NPS will address avoid/minimize/mitigate requirement and when determination will be issued.	States project of this scale warrants open, transparent review and public input before decisions are made.	Objects to 10-day review period as inadequate for scale and complexity of undertaking.	Objects to rushed and perfunctory NHPA/NEPA process; asks NPS share public comments and response/analysis.	States lack of timely, meaningful public process before CFA/NCPC undermined meaningful consultation.	States Section 106 after FONSI is after-the-fact review and does not satisfy “prior to” requirement.
APE / viewshed analysis	Recommends robust APE because 250-ft arch would be permanent skyline addition; asks evaluation from higher-elevation places such as St. Elizabeths, National Cathedral, and Cedar Hill; questions exclusion of East Potomac Park/JBAB.	Questions reliance on GIS not provided; asks for viewshed study, not just renderings; notes Virginia views are underrepresented; asks explanation of Arlington Boulevard boundary.	No new APE information; notes NPS already evaluated Pentagon Historic District in EA.	Strongly recommends expanding indirect APE to higher-elevation Arlington areas and nearby neighborhoods.	Requests expanded, defensible APE and sharing of basis for APE/identification; asks more complete engagement before effects resolution.	Emphasizes arch interrupts visual/spatial relationships across Monumental Core; July 30 asks whether no-build or alternate locations are foreclosed.	Emphasizes open views and planned sightlines as integral to Arlington Memorial Bridge, Arlington House, Lincoln Memorial, and broader landscape.	States limited focus on direct Lincoln-to-ANC sightline is insufficient; larger viewshed significance is disrupted.	States cultural landscape and viewshed impacts are profound and not adequately addressed.	Says affected cultural resources list is severely lacking and effects to L’Enfant/McMillan Plans receive little serious analysis.	Finds AoE incomplete and calls for more complete analysis of historic resources and visual effects.
Historic properties / effect findings	Requests continued robust evaluation of historic properties within expanded APE; points to PropertyQuest as source for DC properties.	States NPS must identify/evaluate historic properties not listed in NRHP; provides additional known resources in and beyond APE.	No further comments beyond existing evaluation of Pentagon Historic District.	Concurs with list of 43 resources but disagrees with effect findings for LBJ Grove, WWII Memorial, Jefferson Memorial, Theodore Roosevelt Island, and others.	States adverse effects have not been fully addressed and most directly affected parties were not meaningfully engaged.	Cites AoE finding that undertaking changes integrity of setting, design, feeling, association, location, views, vistas, circulation, and designed landscape relationships.	Identifies Arlington House, Arlington National Cemetery, Arlington Memorial Bridge, Lincoln Memorial, Capitol/Washington Monument sightline as nationally important historic landscape.	States bridge and related features serve as symbolic linkage between North and South and visual continuity would be obstructed.	States adverse effects to historic sites and cultural landscapes of highest order are documented and acknowledged.	States arch creates grave adverse effects to design, symbolism, and meaning of capital city and Mall.	States Effects Report correctly identifies multiple adverse effects but fails to adequately avoid/minimize or resolve them.
Lincoln Memorial-Arlington House / ANC axis	Prior comments referenced inconsistency with Memorial Avenue symbolic view corridor; July letter focuses on broader skyline/APE.	Requests analysis of visibility from Virginia and high-elevation views that could affect reciprocal relationships.	No comment.	Requests reassessment of indirect visual effects; concerned about effects to Arlington neighborhoods and elevated viewpoints.	Flags project as consequential addition to monumental landscape; alternatives should address corridor impacts.	States arch severs key visual/spatial relationships and competes with Lincoln-ANC/Arlington House reunification views.	Describes bridge/axis as symbol of national reconciliation, unity, remembrance, and shared sacrifice; views are integral.	States proposed design disrupts Lincoln Memorial-to-Arlington viewshed significance and balanced architectural relationship.	Says NPS should focus on alternatives/modifications to avoid damage to cross-Potomac cultural landscape.	States corridor honors service, not triumph; triumphal form violates meaning of Memorial Circle and sacrifice of veterans.	Supports relocation to avoid harm to existing memorials and preserve corridor relationships.
Alternatives / avoidance / minimization	Earlier quoted by commenters: avoidance should begin with range of locations; South Capitol/Douglass Bridge and	Requests viewshed study before APE/effects finalized; alternative-specific	No comment.	Reassessment/expanded APE needed before appropriate avoidance/minimization can be determined.	Says EA considered only two alternatives; requests genuine consultation on	States no credible avoidance; July 30 asks whether no-build and alternative-location options are	Calls for thorough process before decisions; does not identify specific alternative site.	States NPS must consider re-siting and cannot limit analysis to narrow sightline/design justifications.	Requests withdrawal of AoE and serious consideration of alternative locations, including Douglass	Urges project be sent back to drawing board; asks what alternative symbolic forms and	States NPS failed to consider less harmful alternatives; specifically supports South

Issue / topic	DC SHPO	Virginia DHR	WHS / DoW	Arlington HPP	NPCA	TCLF	Arlington Historical Society	AIA DC	Committee of 100	National Mall Coalition	National Trust
	Sousa Bridge discussed by others.	comments not primary focus.			alternatives and modifications.	being considered or foreclosed.			Bridge and NCPC master plan sites.	locations should be considered.	Capitol/Anacostia riverfront location.
Agreement document / PA vs MOA	No direct July 24 comment on PA form; expects consultation to remain open.	No PA-specific comment in APE/identification letter.	No comment.	Comments focus on APE/effects/archaeology rather than PA form.	Objects to draft PA placeholders and unrevised June 5 materials; seeks comment disposition and revised process.	Says mitigation is token and Section 106 process is undermined; July 30 asks procedural questions about determinations and disagreement resolution.	No PA-specific comment.	Comments on draft PA in relation to inadequate process and failure to avoid/minimize.	Says AoE should be withdrawn and NPS should not limit consultation to minor design changes.	Associates with Committee of 100 objections to project/process.	States PA is inappropriate under 36 CFR 800.14(b); recommends MOA instead.
Mitigation / documentation / interpretation	Comments focused on APE and continued public/party comment opportunities.	Requires better identification/evaluation before effects and mitigation can be determined.	No comment.	States comprehensive reassessment needed before mitigation; archaeological effects must be addressed.	Requests meaningful resolution of adverse effects tied to full consultation; criticizes lack of changes from comments.	States proposed minimization/mitigation barely registers as token and cannot offset extraordinary effects.	Supports expert analysis/public input to inform preservation, planning, and environmental review.	Says reports fail to consider avoidance or mitigation for all substantially affected resources.	States NPS must develop/evaluate alternatives or modifications that avoid, minimize, or mitigate adverse effects.	Questions whether a 250th memorial could add meaning through different forms/locations; implies interpretation cannot substitute for poor siting/form.	Says documentation/mitigation cannot substitute for avoidance/minimization; asks substantive revisions.
Archaeology / cultural resources inventory	References PropertyQuest for additional DC historic-property information; no detailed archaeology comment in July letter.	Identifies need to evaluate archaeological resources; expects NPS to identify unevaluated resources within APE.	No comment.	Identifies Alexandria Canal plus 13 additional V-CRIS archaeological sites; requests DC archaeological resources and effects be identified.	Requests adequate identification/evaluation and consulting party role in resource identification.	No archaeology-focused comment in July 18/30 letters.	No archaeology-specific comment.	No archaeology-specific comment.	Focuses on cultural landscapes/viewsheds; not detailed archaeology.	States cultural resources list is lacking; not detailed archaeological inventory.	Raises legal/Section 106 deficiencies; may require fuller identification but not focused on specific archaeological sites.
Legal authority / CWA / 40 U.S.C. 8106 / Height Act	July 24 letter does not raise legal-authority issues; focuses on APE.	No legal-authority comment in APE/identification letter.	No comment.	No legal-authority comment.	Raises Commemorative Works Act, Height Act, and related legal concerns; asks compliance be resolved.	Raises lack of congressional authorization, Commemorative Works Act, Height Act, and 40 U.S.C. § 8106 concerns.	References longstanding concern with building heights/visual character through Rosslyn case, not statutory CWA analysis.	States CWA and 40 U.S.C. § 8106 require Congressional authorization; raises Height Act concerns.	Raises CWA, Height Act, 40 U.S.C. § 8106, Section 4(f), NEPA, FAA/FHWA issues.	States laws protect historic plans and public consultation; associates with Committee of 100.	States undertaking fails to comply with CWA, Height Act, NEPA, and Section 4(f).
NEPA / Section 4(f) / other federal reviews	No NEPA or Section 4(f) comment in July 24 letter.	No NEPA/4(f) comment in July 21 letter.	Notes NPS evaluated Pentagon Historic District in June 2026 EA.	No NEPA-specific comment; requests effects reassessment.	States NEPA process inadequate and EA considered only two alternatives.	References process after CFA approval; no detailed NEPA/4(f) analysis in July 18/30 excerpts.	Calls for review through CFA, NCPC, NEPA, and Section 106 before decisions.	Focuses on NHPA, CWA, 8106, Height Act; no detailed 4(f).	Objects to rushed NHPA/NEPA process; raises Section 4(f), FAA, FHWA implications.	Focuses on public process, historic plans, form/location; not detailed NEPA/4(f).	States NEPA and Section 4(f) compliance are deficient and should be addressed.
Design form / symbolism / design competition	No July 24 comment on design symbolism.	No design-form comment beyond visibility/scale driving APE.	No comment.	Focuses on effects to resources; no design competition comment.	Calls project one of most consequential additions to monumental landscape; alternatives should examine project assumptions.	States no design competition for second-largest monument in Monumental Core; triumphal arch at this site is incompatible development.	Emphasizes established symbolism of bridge/axis as reconciliation, unity, remembrance, sacrifice.	States form/scale disrupts balanced architectural relationship and viewshed.	States NPS improperly foreclosed alternatives to location/height/form and should not limit changes to minor design details.	Argues “the form itself is wrong”; triumphal arches mean triumph/victory/conquest while corridor honors service/sacrifice.	Supports less harmful location and more complete alternative/design analysis.

Issue / topic	DC SHPO	Virginia DHR	WHS / DoW	Arlington HPP	NPCA	TCLF	Arlington Historical Society	AIA DC	Committee of 100	National Mall Coalition	National Trust
Requested NPS next steps	Keep consultation/comment open; evaluate higher-elevation views; explain APE exclusions; use PropertyQuest for resources.	Provide GIS/viewshed model; expand/justify APE; identify/evaluate listed and unevaluated properties; analyze visibility from Virginia.	Designate WHS as consulting party; no further substantive comments on Pentagon beyond EA.	Expand indirect APE; reassess effect findings; identify additional archaeological resources and effects.	Extend deadlines; share comments and dispositions; schedule sustained consultation; revisit alternatives and PA.	Hold additional meetings; explain avoid/minimize/mitigate approach; clarify no-build/alternate location; answer timing and determination questions.	Conduct thorough, open public process considering preservation, visual impacts, planning, and public input.	Obtain congressional authorization; extend consultation; consider re-siting and broader avoidance/minimization.	Share public comments and responses; withdraw AoE; evaluate alternative locations/heights; provide documentation basis.	Send project back to drawing board; address purpose, form, location, meaning, L’Enfant/McMillan Plans, public process.	Substantially revise AoE/draft PA; use MOA; evaluate South Capitol alternative; comply with NHPA/CWA/HBA/NE PA/4(f).

Source Notes

- DC SHPO, Additional Comments on the Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle, July 24, 2026.
- Virginia Department of Historic Resources, Comments regarding APE and Identification, DHR File No. 2026-4065, July 21, 2026.
- Washington Headquarters Services / Department of War email, July 16, 2026.
- Arlington County Historic Preservation Program memorandum, July 16, 2026.
- National Parks Conservation Association, Section 106 Response Letter, July 18, 2026.
- The Cultural Landscape Foundation, Section 106 letter, July 18, 2026
- Arlington Historical Society email and attached article, July 19, 2026.
- AIA Washington DC comments, July 19, 2026.
- Committee of 100 on the Federal City comments, July 17, 2026.
- National Mall Coalition consulting party comments, July 19, 2026.
- National Trust for Historic Preservation comments, July 19, 2026.

Appendix E - August 6, 2026 Consulting Party Comment Summary

Commenters represented: Family Circle of Descendants at Arlington House; NCPC staff; DC Preservation League; National Mall Coalition; National Parks Conservation Association; The Cultural Landscape Foundation; Virginia Department of Historic Resources; Arlington County Historic Preservation Program; NPS National Historic Landmarks Program; AIA|DC; National Trust for Historic Preservation.

Issue / Topic	Family Circle	NCPC	DCPL	National Mall Coalition	NPCA	TCLF	Virginia DHR	Arlington HPP	NHL Program	AIA DC	National Trust
Overall position / effect finding	Urges NPS to formalize the adverse effect finding and conclude that no-build is the best course; states the Arch would irreparably harm Arlington House and related resources.	States revised APE, preliminary assessment of effect table, and visual analysis appear thorough and complete; no additional comments at this time.	States the AoE correctly identifies severe, irreversible adverse effects to more than 200 historic properties and cultural resources.	Supports alternative sites; notes NPS analysis finds the Arch could adversely affect 37 nearby historic sites.	Agrees adverse effect findings for all 37 properties should be carried into the final determination and not watered down.	Strongly opposes siting the Arch at Memorial Circle and concurs with the extensive adverse effects identified in NPS materials.	Continues to agree the undertaking would adversely affect numerous historic properties, but says finalizing the effect determination is premature.	Concurs with the preliminary finding of adverse effect but reserves final opinion pending final data and clearer methodology.	Generally agrees with the effect findings, with impacts to the long list of historic sites and cultural landscapes identified by NPS.	Objects to the proposed Arch and concurs with impacts to the long list of historic sites and cultural landscapes identified by NPS.	Strongly opposes the Arch due to location, height, scale, and design; states it would cause substantial adverse effects to nationally significant resources.
Consultation process, timing, and procedural adequacy	States descendants and the public have been left out of decisions affecting Arlington House; asks whether NPS will listen and follow the law.	Requests that comments from other consulting parties be shared if possible; looks forward to continued consultation to resolve adverse effect.	States this is not a proper Section 106 process and characterizes the process as having no avoidance, minimization, or mitigation.	Calls for serious discussion in the Section 106 public review process before decisions on site, size, and form.	Requests at least 60 more days, a consulting party meeting before any finding, and written responses to comments received to date.	Says Section 106 began after CFA final design approval; notes only one consulting party meeting and that TCLF and others were invited later.	States NPS has not addressed prior SHPO or public/consulting party comments and has constrained consulting party participation and timing.	States the comment deadline does not follow standard protocols and the request appears to shift the federal agency's responsibility to consulting parties.	No process objection; provides technical comments on effect findings and table corrections.	Urges NPS to carefully consider consulting party expertise and input in next steps.	Objects to the 9-day review period and says it is unreasonable for a 61-page property list with 37 acknowledged adverse effects.
APE and viewshed methodology	Emphasizes the Arlington House viewshed across the Potomac and its relationship to the Lincoln Memorial and Arlington Memorial Bridge.	Finds the revised final APE, preliminary assessment table, and visual analysis appear thorough and complete.	States effects extend across the capital, including properties as far as Washington National Cathedral.	Does not challenge methodology in detail; emphasizes need to consider alternative sites given acknowledged adverse effects.	Says 3.5-mile study area stops too soon; requests expanded viewshed, winter/leaf-off analysis, correction for missing Secret Service redaction data, field verification, simulations, and underlying data.	Argues the Arch interrupts and severs key visual and spatial relationships integral to the Monumental Core.	States NPS has only addressed additional viewshed impacts and not other reasonably foreseeable effects from long-term traffic, pedestrian, and use changes.	Appreciates 3.5-mile APE expansion but asks whether seasonal vegetation was evaluated; requests map terminology and methodology be clarified.	Questions how visibility conclusions were reached in the Secret Service redaction boundary where building/tree returns were removed.	Focuses on the visual/spatial connection rather than model method; says the link between Lincoln Memorial and Arlington House will be destroyed.	States the "indirect APE" label is wrong because many visual effects are direct; says cumulative, later-in-time, and distant effects have not been fully evaluated.
Identification of historic properties and datasets	Identifies Arlington House, Arlington House Historic District, Arlington House Cultural Landscape, Arlington National Cemetery Historic District, and related sites as harmed.	No additional comments; requested sharing other consulting party comments.	States more than 200 historic sites and cultural resources are affected.	Notes 37 nearby historic sites could be adversely affected.	States 208 historic properties are within the APE and identification is not finished; asks for stewards and additional parties to be invited.	Concurs with adverse effects listed in the preliminary effect tables; objects that significant cultural landscape values are being overridden.	States NPS has not met 36 CFR 800.4 because it considered NRHP-listed properties but not eligible properties, including V-CRIS resources.	Requests inclusion of locally significant NRHP-eligible resources, archaeological resources in the expanded APE, clearer table/map cross-references, addresses, and VA/DC sorting.	Requests map numbers in effect table and corrections to NHL listings, including Davidson Building and Founders Library entry.	References a broad concentrated landscape of cultural resources and the interdependence of Monumental Core spaces and structures.	States NPS must include NRHP-eligible, not merely listed, properties and says additional adverse effects need to be acknowledged.
Application of criteria of adverse effect	States the project meets 36 CFR 800.5(a)(1) by altering setting, design, feeling, association, views, circulation, and landscape relationships.	No technical comments on criteria; accepts materials as thorough and complete.	Frames effects as severe, irreversible, and damaging to viewshed, setting, and feeling.	Supports serious discussion of acknowledged adverse effects and alternatives.	Requests reversal or reexamination of several no-adverse-effect findings, including WWI, MLK, FDR, DC War Memorial, and Theodore Roosevelt Island.	Concurs with NPS statements that effects change integrity of setting, design, feeling, association, and sometimes location through visual, spatial, and physical changes.	Says finalizing an effect determination is premature because identification under 800.4 remains incomplete.	Asks NPS to define parameters for adverse visual effect, rooftop/upper-level visibility, human-scale views, facades, secondary elevations, and public right-of-way assumptions.	Generally agrees but recommends reassessing Healy Hall and Pan American Union Building and revising National War College to no adverse effect.	States the proposal will aesthetically and symbolically destroy the Lincoln Memorial–Arlington House axis.	Says additional adverse effects should be acknowledged, especially upper-level/rooftop views and red obstruction lights.
Lincoln Memorial–Arlington House / Memorial Avenue axis	States the architect's intention was to unite North and South through views from Lincoln Memorial across Memorial Bridge to Arlington House; that intention cannot be mitigated with a structure between them.	No separate comment in this correspondence.	States the project causes permanent damage to the sacred visual axis connecting Lincoln Memorial, Arlington Memorial Bridge, Arlington House, and Arlington National Cemetery.	Supports alternative sites because the Memorial Circle location affects highly meaningful historic sites.	Identifies the corridor among the properties harmed and says the Arch would damage the plan and western end of the National Mall.	States the Arch permanently interrupts the intentional visual and symbolic connection between the Lincoln Memorial and Arlington House, and between JFK gravesite and the Lincoln Memorial.	Asks whether NPS addressed DCHPO comments about alternate locations to avoid effects to nationally significant properties and NHLs.	States setting, design, feeling, and association for directly affected resources could be altered.	No broad axis comment; gives specific property-level corrections.	Provides detailed history of the McMillan/AMB axis and states the project occludes and transforms vistas from both Lincoln Memorial and Arlington House.	States most devastating effects would be to Arlington National Cemetery, Lincoln Memorial, and National Mall; supports South Capitol Street alternative.
Arlington House, Arlington National Cemetery, families, and ceremonial use	Emphasizes descendant connection to Arlington House, enslaved and free ancestors, healing/education, and the viewshed as integral; requests notification/consultation for 19th-century finds and African-American remains.	No substantive comment.	Identifies Arlington House and Arlington National Cemetery as part of sacred visual axis harmed by the project.	No specific family/cemetery operational detail in Aug. 6 letter.	Requests analysis of Memorial Avenue funeral processions, traffic/circulation, security perimeter, cemetery sections beyond 43/60/66, and invites veterans/family organizations.	States visitors would be visible on the rooftop observation deck during solemn interment/numment ceremonies held dozens of times daily.	Raises NPS jurisdiction/control over many adversely affected historic properties and special consideration for nationally significant values.	Notes construction noise, atmosphere, traffic, pollution, and vehicle shifts would affect Arlington County and historic resources.	No specific cemetery/family comment.	Notes the experience of moving along the corridor, including to funerals, would be overwhelmed by the Arch.	States the assessment does not consider effects on 6,000+ burial ceremonies during three years of construction or cultural heritage tourism at ANC.
National Historic Landmarks / Section 110(f)	Discusses Arlington House significance but does not frame comments expressly under 110(f).	No comment.	No specific 110(f) analysis; asserts widespread damage to national historic resources.	No specific 110(f) analysis in Aug. 6 letter.	States 37 adverse effects include six NHLs; asks NPS to carry findings forward and address NHL harm.	References Monumental Core and nationally significant resources but primarily frames comments through cultural landscape standards and alternatives.	Invokes 54 U.S.C. 306107 and asks whether NPS considered alternate locations/designs or no-build to minimize harm to NHLs.	No specific 110(f) citation; requests methodology and comprehensive assessment.	Provides technical NHL-specific corrections and reassessment requests, including Healy Hall, National War College, Pan American Union Building, Davidson Building, Founders Library, and data gaps.	No direct 110(f) citation; discusses national significance of the axis and Monumental Core.	States the project fails to comply with Section 106 and 110(f), and that additional effects require study.
Alternatives, no-build, relocation, temporary, reduced scale	Requests no-build as the best course and states the Arch should not be constructed at Memorial Circle or anywhere else.	No comment.	Urges NPS to change direction; states no mitigation can adequately minimize the structure.	Supports alternative sites including South Capitol Street and Barney Circle; also suggests a temporary arch to allow time for lawful analysis.	Requests alternatives analysis before any finding; DC SHPO locations, Memorials and Museums Master Plan sites, smaller designs, non-permanent commemorations, no action.	Asks whether no-build or alternative location options are being considered or foreclosed; urges alternative site or abandonment.	States NPS has not addressed alternatives; asks if alternate locations/designs/no-build were considered and says effects can be avoided while meeting 250th anniversary goal.	Does not propose specific alternatives in this letter; asks for future mitigation/minimization consultation.	No alternatives request.	Opposes project as sited, scaled, and designed; does not offer a specific alternate site.	Supports South Capitol Street alternative proposed by DC SHPO; says less harmful alternatives appear already rejected.
Design competition, purpose, form, and symbolism	States the Arch form is colonialist and not a memory of triumph for Indigenous peoples or descendants associated with the land.	No comment.	Objects to out-of-scale insertion and effects on capital skyline and character.	Temporary arch precedent cited; asks for time to analyze best site, size, and form for a permanent monument.	Notes other ways to mark the 250th anniversary should be considered without permanent monument in this landscape.	States no design competition was held for what would be the second-largest monument in the Monumental Core; says the form/site were treated as a fait accompli.	Focuses on alternatives and NHL harm, not design competition.	No design competition comment.	No design competition comment.	States the Arch clashes with solemn memorialization and is an inappropriate, over-scaled proposal with vague purpose.	Opposes planned location, height, scale, and design; reiterates broader legal and consultation concerns.
Height Act, statutory authority, CWA, NEPA, Section 4(f)	Asks whether the law will be followed; no specific statutory list beyond NHPA comments.	No comment in this correspondence.	States project violates the Height of Buildings Act; says neither Executive Branch, NCPC, nor NPS can waive or reinterpret the statute.	Calls for thoughtful and lawful analysis; no detailed statutory discussion in this Aug. 6 email.	Maintains objections regarding congressional authorization and environmental review; asks NPS to identify statutory authority and reopen NEPA/withdraw FONSI or prepare EIS.	Raises lack of congressional authorization, Commemorative Works Act, Height of Buildings Act, and 40 U.S.C. 8106.	Focuses on NHPA/36 CFR Part 800 and 54 U.S.C. 306102(b)/306107; no Height Act comment in Aug. 6 letter.	No legal/statutory authority comment beyond Section 106 process.	No legal authority comment.	Suggests subject/purpose conflicts with CWA if no commemorative purpose; prior comments also raised statutory issues.	Reiterates alleged noncompliance with Height Act, NHPA Sections 106/110(f), Section 4(f), NEPA, and CWA authorization.
Construction, utility, traffic, cumulative, and operational effects	Focuses on permanent visual/spatial/cultural impacts; requests archaeology/discovery consultation.	No comment.	No specific construction effects; frames effects as irreversible and citywide.	No specific construction or utility comment.	Says construction damage, staging, trenching, utilities, traffic, security perimeter, visitor use, and cumulative effects from other federal projects are missing from assessment.	Notes observation deck visibility during ceremonies and permanent visual disruption; less focus on construction mechanics.	States NPS did not address reasonably foreseeable effects from long-term changes in air, vehicular, and pedestrian traffic caused by the Arch.	Urges consideration of construction noise, atmospheric effects, traffic shifts, pollution, and increased vehicle traffic in Arlington and D.C.	No construction comment.	States moving through the corridor, including for funeral use, would be overwhelmed.	States no consideration of 6,000+ burial ceremonies, cultural heritage tourism, construction traffic patterns, or volumes.
Archaeology, Tribes, descendant communities, and discoveries	Requests notification for 19th-century resources; asks to be consulted on post-review discoveries and African-American human remains/burials.	No comment.	No specific archaeology comment.	No specific archaeology comment.	States archaeology is absent and requests archaeological survey; asks for federally recognized Tribes to be consulted government-to-government.	References Indigenous use and cultural landscape values mainly through previous concerns; no detailed archaeology protocols in Aug. 6 letter.	States identification is incomplete; prior concerns include eligible properties; Aug. 6 letter emphasizes broader 800.4 identification deficiency.	States archaeological resources in the expanded APE must be analyzed and data was not included.	No archaeology comment.	No archaeology comment.	Focuses on NRHP-eligible resources; no specific archaeology protocol in excerpted Aug. 6 comments.
Lighting, nighttime effects, rooftop/upper-level views	Does not specifically address lighting; visual intrusion should include physical size/height and lighting refinement.	No comment.	No specific lighting detail; addresses skyline and viewshed damage.	No lighting comment.	Requests lighting analysis, nighttime simulations, and notes nighttime lighting is cited for many adverse effects without a lighting plan.	Objects to visual/spatial effects; no separate lighting methodology comment in Aug. 6 letter.	No specific lighting comment in Aug. 6 letter.	No specific lighting comment; asks for methodology for visual effect and rooftop/upper-level visibility assumptions.	Questions visibility conclusions where DSM data were removed in Secret Service redaction zone.	No specific lighting comment.	Says rooftop/upper-level visibility can be adverse, especially with flashing red lights in evening.
Mitigation, agreement document, PA/MOA	Suggests revisions to PA: add Family Circle as consulting party; include structure size/height in visual mitigation; consult Family Circle on discoveries.	Looks forward to continued consultation to resolve adverse effect.	States no PA or mitigation measure can adequately minimize the structure.	Temporary arch proposed as alternative to allow proper study before permanent monument.	Requests MOA rather than PA; says PA would defer avoidance/minimization/mitigation specifics; asks not to seek NCPC final approval Sept. 3.	States proposed minimization/mitigation are token gestures and cannot deter extraordinary adverse effects; says PA consistency with cultural landscape standards would be baseless.	Says meaningful alternatives are prerequisite to avoidance/minimization; requests sufficient time and public comments.	Welcomes future conversations about mitigation/minimization after final determinations.	Requests table corrections and reassessments; no agreement document comment.	Does not discuss agreement type; urges NPS to consider consulting party input.	Says less harmful alternatives appear rejected and full accounting of all types of adverse effects is necessary before resolution.
Requested next steps	Formalize adverse effect; select no-build; add Family Circle to PA/consulting party list; require consultation for 19th-century finds and African-American remains.	Share other consulting party comments if possible; continue consultation to resolve adverse effect.	Change direction; do not proceed as proposed.	Analyze alternative sites and temporary structure option before permanent decision.	Issue final adverse effect for all 37; expand/rerun viewshed; provide simulations/lighting/data; analyze construction/archaeology/cumulative effects; invite more parties; extend schedule; use MOA; reopen NEPA; identify authority.	Answer whether no-build/alternative location are foreclosed; find alternative site or abandon project.	Complete 800.4 identification, consider alternatives/no-build, address prior comments, share public comments, give sufficient review time.	Clarify methodology/datasets/maps; include local NRHP-eligible and archaeological resources; define adverse effect parameters; provide finalized data.	Reassess Healy Hall/Pan American Union; revise National War College; add map numbers; correct NHL entries; explain Secret Service redaction data effect.	Consider consulting party expertise; oppose erection of Arch in its current location/design.	Provide more time; evaluate direct/cumulative/construction effects and NRHP-eligible properties; consider South Capitol alternative; acknowledge additional adverse effects.

Appendix F - Architectural Plans

(see separate document)

Appendix G - Transportation Changes

(see separate document)

Appendix H – Landscape Rendering

(see separate document)

Appendix I - Area of Potential Effect Maps (Revised)

(see separate document)

Appendix J - List of Historic Properties within the Project Area

Map ID	Resource Name	NRHP Designation
1	Memorial Avenue Corridor Cultural Landscape	National Register of Historic Places (NRHP) cultural landscape
	Memorials: 101st Airborne Division Memorial, 4th Infantry Division Memorial, American Armored Force Memorial, Seabees Memorial, United Spanish War Veterans Memorial (The Hiker), Women in Military Service for America Memorial	Contributing
	Statues and Monuments: Arts of War-Sacrifice, Arts of War-Valor, Rear Admiral Richard Evelyn Byrd Monument	Contributing
	Arlington Hemicycle and Pylons	Contributing
	Arlington Hemicycle circular pool (including basin in central niche)	Contributing
	Arlington National Cemetery Gates and Gate Pylons (Gatehouses)	Contributing
2	Arlington Memorial Bridge and Related Features	Contributing/NRHP
	Memorial Avenue Bridge (Arlington Memorial Bridge Extension, also referenced as Boundary Channel Bridge)	Contributing
	Memorial Circle Pylons	Contributing
	Circulation: Memorial Avenue, Memorial Circle, and the pedestrian system on the two bridges (Memorial and Arlington) and avenues	Contributing
	Boundary Channel below Memorial Avenue Bridge (Arlington Memorial Bridge Extension)	Contributing
	Small-scale features: original cast-iron inlet grates along both bridges and Memorial Avenue; Washington standard lampposts, "Durax" centerline of Memorial Avenue and both bridges; granite block "Durax" surface of Memorial Avenue Bridge; granite curbstones; granite header stones at the ends of bridges; granite lamppost bases; paving of sidewalks on two bridges and avenue, and triangular "islands" of granite blocks at east and west ends of Memorial Circle	Contributing
	Vegetation: Grass panels and Holly hedge along Memorial Avenue, White oak border of Memorial Avenue, White pines at four pylons near Memorial Circle, White oaks near Arlington Cemetery gates and hemicycle stairways, Yews along hemicycle stairways and wrought iron fence	Contributing
	Views and vistas: View of the Washington Monument from various locations along the corridor, view to hemicycle and Arlington House - the Robert E. Lee Memorial, view to Lincoln Memorial, views of green parkland along both sides of Potomac from Arlington Memorial Bridge, and views to river, the Capitol dome, and other monuments from Memorial Circle	Contributing
3	Lady Bird Johnson Park Cultural Landscape	NRHP cultural landscape
	Circulation: George Washington Memorial Parkway (GWMP) (see below under George Washington Memorial Parkway Cultural Landscape); Lyndon B. Johnson Memorial Grove; Memorial Circle; Mount Vernon Memorial Highway; Mount Vernon Trail (southern portion, to Humpback Bridge); Columbia Island Marina, parking lot and entrance to Lyndon Baines Johnson (LBJ) Memorial Grove	Contributing
	Vegetation: All of the stone plantings, Cottonwoods, crabapple, pear and elm trees remaining from 1932 planting, daffodils, dogwoods, large white pines near pylons, plantings of LBJ Memorial Grove, yews at Navy and Merchant Marine Memorial	Contributing

Map ID	Resource Name		NRHP Designation
		Buildings and Structures: Arlington Memorial Bridge Boundary Channel Extension; Bridge over Boundary Channel; Boundary Channel Bridge (New); Columbia Island Marina snack bar; Memorial Circle, four pylons; rip rap, historic, south end of island; LBJ Memorial Grove, wooden entrance deck on Virginia shore including walks, stone walls, etc.; LBJ Memorial Grove, megalith; LBJ Memorial Grove, flagstone plaza; LBJ Memorial Grove, entire site; LBJ Memorial Grove, pedestrian bridge; Navy and Merchant Marine Memorial; flagstone plaza; U.S. Route 50 Overpass, westbound; Washington Boulevard Bridge; Washington Boulevard Overpass; Arlington Memorial Bridge; LBJ Memorial Grove, low stone-and-concrete wall along flagstone walk	Contributing
		Views and vistas: GWMP, northbound views north of Arlington Memorial Bridge to Theodore Roosevelt Island, D.C. shoreline, Kennedy Center; GWMP, northbound views to LBJ Memorial Grove, megalith, and Navy and Merchant Marine Memorial; GWMP, northbound views to Washington shoreline and National Mall; GWMP, northbound views up river to Arlington Memorial Bridge; LBJ Memorial Grove views and vistas along entry route, from plaza on VA shore, across bridge, along walks to meadow area and to Grove and flagstone plaza; LBJ Memorial Grove vistas from flagstone plaza to National Mall and East and West Potomac Parks; Memorial Circle views east to Lincoln Memorial, west to Arlington House and Arlington National Cemetery, north up island and south down island; Mount Vernon Trail views along trail near Potomac River shore, corresponding to views from northbound and southbound GWMP	Contributing
		Small-scale features: benches, granite panels, light posts, plaque, drinking fountains, guardrails	Contributing
		Water features: Boundary Channel; Columbia Lagoon (also called Columbia Basin, Pentagon Lagoon)	Contributing
4	Arlington National Cemetery Historic District		NRHP historic district
		Vegetation and Landscapes: Argonne Cross Landscape; Arlington Hemicycle Landscape; Chaplains Hill; Civil War Unknowns Landscape; Columbarium Courts Landscape; Confederate Memorial Section; Custis Woods; James Tanner Amphitheater; Kennedy Family Gravesites; Memorial Amphitheater; Memorial Arboretum; Millenium Woods and Stream; Nurses Memorial Associated Features; Pershing Gravesite Landscape; Red Spring Landscape; Scatter Area; Trees, Medal of Honor; Trees, Memorial Tres; Trees, State Champions and Co-Champions; U.S. Coast Guard Memorial; picturesque plantings patterns, hedgerows, oak trees	Contributing
		Views and vistas: View of Air Force Memorial; View of Arlington House from Kennedy Memorial; View to Arlington House down Crook Walk from Memorial Amphitheater; View of Arlington National Cemetery (ANC) from Memorial Bridge Memorial Drive, and Lincoln Memorial; View of ANC from Washington D.C. Potomac Shoreline (between 14 th Street Bridge and Memorial Bridge); View of Lincoln Memorial and Washington Monument from Arlington House, Kennedy Gravesite; View to Main Gates from Southern perspective and Northern perspective; Views to Memorial Amphitheater from various locations; View to Netherlands Carillon; View of Old Amphitheater from various locations; View of the Pentagon from Pentagon Memorial; View to Spanish-American War Memorial from U.S.S Maine Memorial; View to U.S.S Maine Memorial from Memorial Amphitheater; View toward Fort Myer Gate and Chapel from ANC; Views of Washington Monument from ANC	Contributing
		Boundary Gates, Demarcations and Walls: Welcome Center Gate; Welcome Center Parking Gate; Administration Building Gate; East /Jefferson Davis Highway Gate; Service Complex Gate; South/Clayton Gate; Hobson Gate; Memorial Chapel Gate; West Gate (Selfridge); Fort Meyer/Old Post Chapel Gate; Ord & Weitzel Gate (New); Memorial Avenue north gate; Memorial Avenue south gat	Contributing
		Circulation Systems: Crook Walk; Custis Walk; Custis Walk Extension; Footbridges, Crook Walk; Memorial Avenue ("Avenue of Heroes"); Memorial Avenue Fountain Plaza; Memorial Avenue West Terminus (Cobblestone Drive); Millenium Bridge (Gifford Drive Bridge); Pedestrian Bridge; Road System; Sidewalks; Stairs and stone steps	Contributing
		Drainage Features: Select Drainage Ditches and Culverts; Historic Concrete Channels; Red Spring	Contributing

Map ID	Resource Name	NRHP Designation
	Monuments and Memorials: 2nd Connecticut (Volunteer) Heavy Artillery Regiment; Civil War Headstones; Confederate Headstones; 1903 Government Headstones; USCT and Freedman Village Residents; "Standard" Headstones; Flat Headstones; Victorian-Era Monuments; Group Headstones; 3rd Infantry Division Memorial; 4th Infantry (Ivy) Division Memorial; 101st Airborne Division Memorial; Air Force Memorial Complex; Apollo 1 Memorial Plaque; Argonne Cross (and associated features); Armored Forces Memorial; Chaplains Hill; Battle of the Bulge Memorial; Richard Evelyn Byrd Memorial; Canadian Cross Memorial; Civil War Unknown; Confederate Memorial; Iran Rescue Mission Memorial; John F. Kennedy Memorial Gravesite; Robert F. Kennedy Memorial Gravesite; Korean War Veterans Memorial; Nurses Memorial; Office of Strategic Services Memorial; Pan Am Flight 103 Memorial; Pentagon Group Burial Marker; Rough Riders Memorial; Space Shuttle Challenger Memorial; Space Shuttle Columbia Memorial; Spanish-American War Memorial; Third Infantry Division Memorial; Tomb of Remembrance; Tomb of the Unknowns and Associated Features; U.S. Coast Guard Monument; U.S.S. Maine Memorial; U.S.S. Serpens Memorial; U.S.S Thresher Memorial; Unknown Dead of 1812; Tree Memorial Markers & Living Memorials	Contributing
	Memorial Graves: Custis Graves; George Crook; Sir John Dill Monument; Matthew Henson; Philip Kearny Monument; Edward M. Kennedy; Major Pierre L'Enfant; Robert Todd Lincoln; Audie Murphy; Gen. John Pershing; Robert Edwin Peary; Mary Randolph; Wallace Fitz Randolph; Revolutionary War Ground Tablets; Philip Henry Sheridan; William H. Taft; John Wingate Weeks; MG Horatio Wright	Contributing
	Small-scale features: Arlington House Flagpole, benches, bollards, drinking fountains, exterior lighting,	Contributing
	Arlington House	Contributing/NRHP
	Arlington Memorial Bridge	Contributing/NRHP
	Arlington House Cultural Landscape	Contributing/NRHP
	Arlington Hemicycle / Military Women's Memorial	Contributing
	Administration Building	Contributing
	Columbarium Pavilion 1	Contributing
	Columbarium Pavilion 2	Contributing
	Millenium Pavilion 11	Contributing
	Millenium Pavilion 12	Contributing
	Hemicycle ("The Court of Honor", "The Great Entrance", Military Women's Memorial)	Contributing
	Lodge 1 (Superintendent's Lodge)	Contributing
	Lodge 1 Gazebo	Contributing
	Lodge 2 (Assistant Superintendent's Lodge)	Contributing
	Lodge 2 Garage	Contributing
	Memorial Amphitheater	Contributing
	Old Amphitheater (James R. Tanner Amphitheater)	Contributing
	Parking: Chaffee Lot; Funereal Queuing; Wheaton Lot	Contributing
	Receiving Vault	Contributing
	Service Complex #1 (4 buildings)	Contributing

Map ID	Resource Name		NRHP Designation
		Service Complex #2 (8 buildings)	Contributing
		Tourmobile (Tram) Bus Stop Structure (Tour Bus Shelter)	Contributing
		Welcome Center (Visitor's Center)	Contributing
5	Arlington House Historic District (also known as Robert E. Lee Historic District)		NRHP historic district
		Site: Landscape and associated features	Contributing
6		Arlington House (also known as the Robert E. Lee Memorial)	Contributing/NRHP
		North Slave Quarter and Kitchen	Contributing
		South Slave Quarter, Storehouse, and Smokehouse	Contributing
		Potting Shed	Contributing
		National Park Service Administration Building, 1931	Contributing
		Mary Randolph's Tomb	Contributing
		Custis Burial Plot	Contributing
		Civil War-era Officers' Graves and Grave Markers Site along Lee Avenue and East of Mansion	Contributing
		Well, ca. 1805, superstructure	Contributing
		Civil War Unknown Soldiers Monument, 1866	Contributing
		Arlington National Cemetery Old Amphitheater	Contributing
		General Sheridan, Admiral Porter, and General Wright Monuments	Contributing
		Pierre Charles L'Enfant Grave and Monument	Contributing
		Arlington House Cultural Landscape	Contributing
7	Arlington House Cultural Landscape		NRHP cultural landscape
		Land Use: Arlington Woods; Flower and Vegetable Gardens	Contributing
		Spatial Organization: Building locations; yard; garden terraces; Arlington Woods	Contributing
		Buildings and Structures: Arlington House; North Slave Quarters; South Slave Quarters; Potting shed; Below-ground section of well	Contributing
		Circulation: Trace road at the north end of Arlington Woods; Flower garden central path; Kitchen garden central path; East/west oriented road connecting Lee Drive and Sherman Avenue between yard and flower garden; Potting shed access road; Portion north/south section of Custis Walk on National Park Service property	Contributing
		Vegetation: trees in mixed hardwood forest of Arlington Woods ravine	Contributing

Map ID	Resource Name		NRHP Designation
		Views and Vistas: View between Arlington House and Washington, D.C.; View between kitchen garden, through yard to flower garden; view north and south along Lee Drive	Contributing
		Small-scale features: rectangular cut bench or mounting stone	Contributing
8	LBJ Memorial Grove		NRHP
9	Mount Vernon Memorial Highway		NRHP historic district
		Richmond, Fredericksburg & Potomac Railroad (RF&P) Underpass	Contributing
		Route 1/I-395 Downstream Underpass	Contributing
		Route 1/I-395 Upstream Underpass	Contributing
		Mount Vernon Memorial Highway alignment	Contributing
		Mount Vernon Trail adjacent to the Mount Vernon Memorial Highway	Contributing
10	Lincoln Memorial Cultural Landscape		NRHP cultural landscape
		Spatial organization: axial relationship with the Mall, axial alignment of the Lincoln Memorial statue with the Approachway, Washington Monument, and U.S. Capitol, axiality of the Reflecting Pool, radial arrangement of central rond-point around Lincoln Memorial Circle, radial arrangement of secondary allées, descent of the Watergate plaza and steps to the Potomac River, location of monuments and memorials establishing the landscapes termini, layout of Ohio Drive SW and Parkway Drive NW along the western edge of the cultural landscape, parallel with the Potomac River shoreline, Open character of playing fields and turf panels between the radial roads and the parkway	Contributing
		Land Use: Commemorative land use as a memorial landscape, dedicated to President Abraham Lincoln, John Ericsson, and Martin Luther King, Jr., Commemorative use as a memorial tree grove, dedicated to the individuals and organizations represented, a space of protest associated with the Civil Rights Movement and First Amendment causes, passive and active recreational use	Contributing
		Topography: Generally flat topography consistent with the construction of East/West Potomac Parks via reclamation, Mounded (round point) topography within Lincoln Memorial Circle, Steeply sloped topography on the east and west sides of Lincoln Memorial Circle, descending to the Reflecting Pool and the Potomac River, Gently sloping topography from the Belvedere and Parkway Drive to 23rd Street NW, Steeply sloping abutments flanking the Parkway Drive and Arlington Memorial Bridge overpasses	Contributing
		Vegetation: plantings in Lincoln Memorial Circle, elm allées and trees, turf island at Constitution Avenue Belvedere, turf panels along Reflecting Pool, in Lincoln Memorial Circle, and between radial roads and parkway, plantings along Watergate Steps area and approach road, remnant naturalistic groves of memorial trees	Contributing
		Circulation: Lincoln Memorial Circle and associated concrete sidewalks, Parkway Drive NW and associated concrete sidewalks, 23rd Street NW/SW and associated concrete sidewalks, Henry Bacon Drive NW and associated concrete sidewalks, Daniel French Drive SW and concrete sidewalk on northeast side, Ohio Drive SW and associated concrete sidewalks, traffic circle and concrete sidewalks at the Belvedere, gravel service road to underground storage area, remnant bridle paths west of Lincoln Memorial Circle, primary, east-west asphalt allée paths, Secondary, north-south concrete paths at east end of Reflecting Pool, Paths and stairs between Reflecting Pool plaza and Lincoln Memorial Circle, Approachway, raised terrace stairs, and stylobate, Gravel walk around outer edge of raised terrace, Lincoln Memorial Circle former parking area, including granite block edging, Watergate Steps area concrete sidewalks, Concrete sidewalks around Ericsson Monument, Concrete sidewalk along south side of Constitution Avenue	Contributing

Map ID	Resource Name		NRHP Designation
		Potomac River seawall between Theodore Roosevelt Bridge and John Ericsson Monument	Contributing
11		Lincoln Memorial statue and structure, including raised terrace, marble stylobate steps, and granite walls	Contributing/NRHP
		John Ericsson Monument and compass terrace	Contributing
		Parkway Drive overpass, including integrated balustrades and benches	Contributing
		Statuary on approach pedestals (Music and Harvest, and Aspiration and Literature)	Contributing
		Underground storage area and retaining walls on Parkway Drive NW	Contributing
		Watergate Steps including plaza wing walls, integrated balustrades and benches	Contributing
		Constitution Avenue Belvedere	Contributing
		Reflecting Pool	Contributing
		Views and vistas: reciprocal views along and between contributing features, panoramic views from the Lincoln Memorial structure toward Watergate Steps, Arlington Memorial Bridge, Arlington House—The Robert E. Lee Memorial, and Parkway Drive, and framed views long Lincoln Memorial porticoes	Contributing
		Small-scale features: granite benches at entrance to Approachway	Contributing
		Small-scale features: cast-iron frame wooden slat benches, Alaska and Hawaii plaque, Martin Luther King Jr “I have a Dream” plaque, memorial tree plaques, Washington Standard lampposts, and Twin-20 lampposts.	Managed as cultural resource
12	National Mall Historic District		NRHP historic district
		Vistas/Views: views from Mall to Union Square; views to building facades from Mall; views up cross streets; vista Capitol to Washington Monument	Contributing
		Circulation roads and walkways and small-scale features	Contributing
		The Mall (Reservation Nos. 3, 3A, 3B, 4, 5, 6, and 6A)	Contributing site/NRHP
		Reservation No. 553	Contributing site
		Reservation No. 201	Contributing site
		National Gallery of Art Sculpture Garden	Contributing site
		President’s Park South	Contributing site
		Ellipse	Contributing site
		Washington Monument Grounds (Reservation No. 2)	Contributing site
		Sylvan Theater	Contributing site
		German-American Friendship Garden	Contributing site
		West Potomac Park (Reservation No. 332)	Contributing site
		Constitution Gardens	Contributing site
		Vietnam Veterans Memorial	Contributing site
		Lincoln Memorial grounds	Contributing site

Map ID	Resource Name		NRHP Designation
		District of Columbia War Memorial grounds	Contributing site
		Korean War Veterans Memorial	Contributing site
13		World War II Memorial	Contributing site
		Thomas Jefferson Memorial grounds	Contributing site
		Franklin Delano Roosevelt Memorial	Contributing site
		George Mason Memorial	Contributing site
14		Martin Luther King, Jr. Memorial	Contributing site/NRHP
		Lock B Archeological Site	Contributing site
		Lockkeeper's House Foundation Archeological Site	Contributing site
		White House Stable Archeological Site	Contributing site
		Tiber Creek Sewer Archeological Site	Contributing site
		Smithsonian Institution Building	Contributing building
		Arts and Industries Building	Contributing building
		U.S. Department of Agriculture Administration Building	Contributing building
		National Museum of Natural History	Contributing building
		Freer Gallery of Art	Contributing building
		National Gallery of Art West Building	Contributing building
		National Museum of American History	Contributing building
		Hirshhorn Museum and Sculpture Garden	Contributing building
		National Air and Space Museum	Contributing building
		National Gallery of Art East Building	Contributing building
		Quadrangle	Contributing building
		National Museum of the American Indian	Contributing building
		Survey Lodge	Contributing building
		Monument Lodge	Contributing building
		National Museum of African American History and Culture	Contributing building
		Constitution Gardens Refreshment Kiosk	Contributing building
15		Lockkeeper's House	Contributing structure/NRHP
		Bulfinch Gatehouses (U.S. Capitol Gatehouse)	Contributing structure
		Bulfinch Gatepost (U.S. Capitol Gateposts)	Contributing structure

Map ID	Resource Name		NRHP Designation
		Washington Monument	Contributing structure/NRHP
		Flood Control Levee	Contributing structure
		Lincoln Memorial	Contributing structure/NRHP
		Reflecting Pool	Contributing structure
		Watergate steps	Contributing structure
		Constitution Avenue Belvedere	Contributing structure
		District of Columbia War Memorial	Contributing structure
		Stone Seawalls	Contributing structure
		Tidal Basin	Contributing structure
		Outlet Bridge	Contributing structure
		Inlet Bridge	Contributing structure
		Kutz Bridge	Contributing structure
		Independence Avenue Extension	Contributing structure
		Thomas Jefferson Memorial	Contributing structure/NRHP
		Constitution Avenue, NW	Contributing structure
		Madison Drive	Contributing structure
		Jefferson Drive	Contributing structure
		Maryland Avenue, SW	Contributing structure
		Pennsylvania Avenue, NW	Contributing structure
		Henry Bacon Drive	Contributing structure
		Daniel French Drive	Contributing structure
		Lincoln Circle	Contributing structure
		Ohio Drive	Contributing structure
		Terminus of the Rock Creek and Potomac Parkway	Contributing structure
		3rd Street, SW	Contributing structure
		4th Street, SW	Contributing structure
		7th Street, NW-SW	Contributing structure
		14th Street, NW-SW	Contributing structure
		Raoul Wallenberg Place (15th Street south of Independence Avenue)	Contributing structure

Map ID	Resource Name	NRHP Designation
	17th Street, NW	Contributing structure
	23rd Street, NW	Contributing structure
	E Street, NW	Contributing structure
	Downing Urn	Contributing object
	Joseph Henry Memorial	Contributing object
	National Grange Marker	Contributing object
	Ellipse Meridian Stone	Contributing object
	General William Tecumseh Sherman Memorial	Contributing object
	Butt-Millet Memorial Fountain	Contributing object
	Zero Milestone	Contributing object
	First Division Monument	Contributing object
	Original Patentees of the District of Columbia Memorial	Contributing object
	Second Division Memorial	Contributing object
	Boy Scout Commemorative Tribute	Contributing object
	John Saul Plaque	Contributing object
	National Christmas Tree Plaque	Contributing object
	Jefferson Pier	Contributing object
	Elevation Obelisk	Contributing object
	100th Anniversary Plaques	Contributing object
	Washington City Canal Memorial Stone and Plaque	Contributing object
16	Memorial to the 56 Signers of the Declaration of Independence	Contributing object/NRHP
	John Ericsson Monument	Contributing object
	<i>The Arts of Peace: Aspiration and Literature</i>	Contributing object
	<i>The Arts of Peace: Music and Harvest</i>	Contributing object
	<i>The Arts of War: Sacrifice</i>	Contributing object
	<i>The Arts of War: Valor</i>	Contributing object
	First Airmail Flight Marker	Contributing object
	Number 4 Fountain	Contributing object
	Commodore John Paul Jones Statue	Contributing object
	First Cherry Tree Planting Plaque	Contributing object

Map ID	Resource Name		NRHP Designation
		Japanese Lantern	Contributing object
		Japanese Pagoda	Contributing object
		Cuban Friendship Urn	Contributing object/NRHP
17	The Mall Cultural Landscape		NRHP cultural landscape
		Vegetation: grass panels, elm tree panels, Ulmus americana planted 1920s-1975, Ulmus americana cultivars replacement of the original elms	Contributing
		Circulation: Jefferson Drive, Madison Drive, 3rd Street, 4th Street, 7th Street, 14th Street, North Vista Walk (formerly Washington Drive), South Vista Walk (formerly Adams Drive), sidewalks along Madison and Jefferson Drives, walk along 5th Street axis, walk along 6th Street axis, walk along 8th Street axis, walk along 9th Street axis, walk along 10th Street axis, walk along 12th Street axis, walk along 13th Street axis	Contributing
		Views and vistas: vista from the Capitol to Washington Monument, views from Mall to Union Square, views to building facades from Mall, views to elms from walks and grass panels, views up cross streets	Contributing
		Small-scale features: benches (1930s design for NCP) and streetlights (1930s design for Mall)	Contributing
18	Washington Monument and Grounds Historic District		NRHP historic district
		Views and vistas: Axial views through Jefferson Pier of the White House and Thomas Jefferson Memorial; Views from the site to the Lincoln Memorial, White House, Thomas Jefferson Memorial, and the U.S. Capitol; Views from top of Monument to the surrounding city and important sites	Contributing
		Circulation roads and walkways, vegetation, and small-scale features	Contributing
		Monument Lodge	Contributing building
		Survey Lodge/Boiler House	Contributing building
		Washington Monument Grounds cultural landscape	Contributing site
		German-American Friendship Garden	Contributing site
		Sylvan Theater	Contributing site
19		Washington Monument	Contributing structure/NRHP
		Bulfinch Gateposts (2) (U.S. Capitol Gateposts)	Contributing structure
		Raoul Wallenberg Place (15th Street south of Independence Avenue)	Contributing structure
		Independence Avenue corridor (including Maine Avenue corridor)	Contributing structure
		Tidal Basin Parking Lot Corridor	Contributing structure
		Tidal Basin Walk with metal pipe handrail – near Tidal Basin Parking Lot	Contributing structure
		Survey Lodge service drive	Contributing structure

Map ID	Resource Name		NRHP Designation
		100th Anniversary Plaques (2)	Contributing resource
		Benches – cast-iron-and-wood slat at perimeter of site (1 group)	Contributing resource
		Cobblestone gutters along Survey Lodge service drive (1 group)	Contributing resource
		Washington Globe lights along the service drive behind the Survey Lodge (1 group)	Contributing resource
		Twin-20 streetlights along Independence and Maine Avenues (1 group)	Contributing resource
		Ring of 50 aluminum flagpoles (1 group)	Contributing resource
		Jefferson Pier Marker	Contributing resource
		Elevation Obelisk	Contributing resource
20	Washington Monument Grounds Cultural Landscape		NRHP cultural landscape
		Vegetation: Street Trees along Tidal Basin Parking; Lawn; Mulberry Tree; Street Trees along 17th Street, Constitution Avenue, 14th Street; Cherry Groves along Tidal Basin; Open Groves; Elm tree along Raoul Wallenberg Place; Elms along Tidal Basin Parking Lot; Elm in southwest grove near Survey Lodge; Catalpa tree behind Survey Lodge; and Large Elm along Tidal Basin near intersection of Raoul Wallenberg and Maine Avenue	Contributing
		Circulation: 17th Street corridor, including sidewalks; Constitution Avenue corridor, including sidewalks; 14th Street corridor, including sidewalks; Independence and Maine Avenue corridors; Tidal Basin Parking Lot corridor; Tidal Basin walk; Raoul Wallenberg Place corridor; Flagstone steps at the Sylvan Theater	Contributing
		Washington Monument	Contributing/NRHP
		Monument Lodge	Contributing
		Survey Lodge	Contributing
		Jefferson Pier survey marker	Contributing
		Bulfinch gateposts (U.S. Capitol Gateposts)	Contributing/NRHP
		Independence Avenue Overpass	Contributing
		Seawall	Contributing
		Views and vistas: Views from D.C. and surrounding region to Monument, Views from top of Monument to the surrounding city and important sites, Views from the site to the Lincoln Memorial, White House, Thomas Jefferson Memorial, and the U.S. Capitol, Vistas of the Monument from Lincoln Memorial, White House, Thomas Jefferson Memorial, and the U.S. Capitol, Axial views through Jefferson Pier of the White House and Thomas Jefferson Memorial, Screened views of the site features	Contributing
		Small-scale features: Elevation Obelisk, Twin-20 double lamp streetlights, Washington Globe single lamp streetlights, Cast-iron and wood slat benches, Ring of flagpoles, Dedication plaque at monument base, Stone-lined drainage ditch at Survey Lodge Service Drive, and Pipe Handrail - Tidal Basin	Contributing
21	Civil War Monuments in Washington, D.C.	Inclusive of Ulysses S. Grant Memorial	NRHP

Map ID	Resource Name		NRHP Designation
22	Rock Creek Park and Potomac Parkway Historic District		NRHP historic district
		Spatial organization: the linear arrangement of the parkway including component roads, pedestrian circulation, open spaces, etc. from north to south; the linear arrangement of the seawall, shared use trail and lawn, parkway roadway proper, and lawn from west to east	Contributing
		Land use as a link connecting Rock Creek Park to West Potomac Park, as a commuter roadway, and a recreational area	Contributing
		Circulation: Rock Creek Potomac Parkway roadway; Pedestrian path to the west of the parkway, between Virginia Avenue, N.W., and F Street, N.W.; Kennedy Center Promenade; granite block median and shoulder; and granite curbs	Contributing
		Topography: human-made site, with a gentle slope rolling downwards from the adjacent properties to the east toward the Potomac River seawall	Contributing
		Vegetation: Sycamore Allée, ca. 1936 vegetation, ca. 1966 vegetation, medium to large specimen trees, trees adjacent to the Roosevelt bridge	Contributing
		Stone seawall along the Potomac Waterfront Section of the Rock Creek Potomac Parkway	Contributing
		The Belvedere (Constitution Avenue, N.W.)	Contributing
		Retaining walls and rip rap along the banks of the Rock Creek	Contributing
		Kennedy Center Stone Retaining Wall	Contributing
		Aluminum handrail along the promenade and integrated bench seat to the east of the promenade	
		Views and vistas from the parkway to the surrounding environs, including the Potomac River, Theodore Roosevelt Island, Georgetown and Key Bridge, Arlington Memorial Bridge, Virginia, shoreline, and West Potomac Park.	Contributing
		Twin-20 Lampposts at the Belvedere	Contributing
23	East and West Potomac Park Historic District		
		Views and Vistas from locations: Tidal Basin; Tidal Basin Inlet Bridge; Tidal Basin Outlet Bridge; Potomac River Seawall; Commodore John Paul Jones Statue; Cuban Friendship Urn; Franklin Delano Roosevelt Memorial; Korean War Veterans Memorial; Martin Luther King, Jr. Memorial; World War II Memorial; Franklin Delano Roosevelt Memorial Visitor Center; Martin Luther King, Jr. Memorial Visitor Center; World War II Memorial Restrooms; World War II Memorial Visitor Center; East Basin Drive Bridge.	
		Lockkeeper's House	Contributing/NRHP
		Stone Seawalls	Contributing
		Tidal Basin	Contributing
		Tidal Reservoir Outlet Bridge	Contributing
		Commodore John Paul Jones Statue	Contributing
		Japanese Cherry Trees	Contributing
		Lincoln Memorial	Contributing/NRHP

Map ID	Resource Name		NRHP Designation
		Dutch Elm Trees	Contributing
		Reflecting Pool	Contributing
		Lincoln Memorial Grounds	Contributing
		John Ericsson Monument	Contributing
		Arlington Memorial Bridge	Contributing/NRHP
		District of Columbia World War I Memorial	Contributing
		Flood Control Levee	Contributing
		Jefferson Memorial	Contributing
		Independence Avenue Extension	Contributing
		Jefferson Memorial Grounds	Contributing
		Kutz Bridge	Contributing
		Guard House	Contributing
		Japanese Lantern	Contributing
		Japanese Pagoda	Contributing
		Constitution Gardens	Contributing
		56 Signers Memorial	Contributing/NRHP
		Vietnam Veterans Memorial	Contributing
		Vietnam Women's Memorial	Contributing
		Franklin Delano Roosevelt Memorial	Contributing/NRHP
		Korean War Veterans Memorial	Contributing
		Stone Seawalls	Contributing
		Potomac Railroad Bridge	Contributing
		Ohio Drive, SW	Contributing
		U.S. Engineers' Storehouse	Contributing
		East Potomac Park Field House	Contributing
		East Potomac Park Golf Course	Contributing
		East Potomac Park Miniature Golf Course	Contributing
		East Potomac Park Swimming Pool	Contributing

Map ID	Resource Name		NRHP Designation
24	American Revolutionary Statuary in the District of Columbia	Inclusive of Commodore John Paul Jones Statue	NRHP

Sources: Army National Military Cemeteries and Virginia State Historic Preservation Officer (2026); Arlington National Cemetery et al. (n.d. [2026]); Bobeczko and Robinson (1998); Dillon (1972); EDAW, Inc. (1992a, 1992b); EHT Tracerics, Inc. and Stantec (2018); Frisbie et al. (2024); Krakow (1993); McIntosh (1979, 1980a, 1980b); National Park Service (2004, 2005, 2006a, 2006b, 2009a, 2009b, 2015, 2016, 2018a, 2018b, 2022a, 2022b, 2024); Pfanz (1980, 1981); Robinson et al. (2016); Scott (1977); Seagraves et al. (1980); Smith et al. (2013); Virginia Polytechnic Institute and State University (2009).

NHL: National Historic Landmark; NRHP: Designated Listed/Eligible for the National Register of Historic Places.

Appendix K - List of Historic Properties within the APE

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
25	Mount Vernon Memorial Highway Cultural Landscape – North of Alexandria	NRHP	Views and Vistas: Northbound vista of the Washington Monument; Northbound views of the Potomac; Views of the U.S. Capitol Building Northbound vista of the Washington Monument; Southbound view of the Roaches Run lagoon.
26	Cuban Friendship Urn	NRHP	Located in West Potomac Park with views of the Potomac River.
27	Franklin Delano Roosevelt Memorial	NRHP	Views from memorial to the Tidal Basin. View from Eleanor Roosevelt statue to the White House.
28	L'Enfant Plan of the City of Washington, District of Columbia	NRHP	Primary vista from U.S. Capitol along the Mall to the Lincoln Memorial and the western horizon; vistas along radiating avenues; vistas along orthogonal avenues; vistas along major cross-axes; tangential views; other frontal vistas; axial street vistas
29	Arlington Ridge Park	NRHP	Views and Vistas: view along Ridge Path to Netherlands Carillon; view from Marine Corps War Memorial to parade ground; view from Netherlands Carillon to flower beds below; view from Netherlands Carillon to Mall; view from reviewing stand to parade ground, and across parade ground to Marine Corps War Memorial; view from U.S. Marine Corps War Memorial to Lincoln Memorial, Watergate Steps, and National Mall; views along entrance drive into park; views along pedestrian walks to Marine Corps Memorial statue; views along Ridge Path and from Netherlands Carillon grounds to National Mall; views from park to Arlington National Cemetery.
30	Pentagon	NHL/NRHP	View/vista: view of Arlington National Cemetery, vistas of the Monumental Core of Washington D.C., across the Potomac, clear views of Washington from Arlington National Cemetery, and vice versa.
31	Fort Myer Historic District	NHL/NRHP	Views toward Washington D.C, Arlington Cemetery; the Pentagon; Potomac River. Contributing resource Whipple Field is significant for its sweeping eastward/southeastward vista of the monumental core of DC.
32	Quarters 1, Fort Myer	NHL/NRHP	Views toward Washington D.C, Arlington Cemetery; the Pentagon.
33	Theodore Roosevelt Island Historic District	NRHP	Views to and from the memorial plaza and statue.
34	Theodore Roosevelt Island Cultural Landscape	NRHP	Views and Vistas: Internal views within and across memorial plaza.
35	Washington Canoe Club	NRHP	Views and Vistas: Views from north of the Washington Canoe Club (WCC) boathouse toward the Chesapeake & Ohio Canal (C&O Canal) and Georgetown; Views from the aqueduct's northern abutment toward the Potomac River, the WCC, the C&O Canal, Georgetown, the Potomac Boat Club, and Key Bridge; Views from the C&O Canal toward the Potomac River, the WCC boathouse, and the aqueduct's northern abutment; Views from the WCC boathouse's façade toward the Virginia shore, Key Bridge, and Three Sisters Islands; Vista along the C&O Canal.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
36	George Mason Memorial	NRHP	Views and Vistas: Inward views of the George Mason Memorial; vista from the George Mason Memorial Sculpture to the Inlet Bridge.
37	Thomas Jefferson Memorial	NRHP	Views and Vista to and from to the Thomas Jefferson statue to the Tidal Basin and White House and Washington Monument.
38	Thomas Jefferson Memorial Cultural Landscape	NRHP	Views and vistas: View across Tidal Basin to Cherry Trees; view south to Interstate 395 and 14 th Street Bridge; View West to Potomac River past Franklin Delano Roosevelt Memorial; Vista North to White House and Washington Monument; Vista to Lincoln Memorial; Vistas to East and West of Memorial.
39	DC War Memorial Cultural Landscape	NRHP	Views and Vistas: View looking north of the Reflecting Pool; View looking south of the Tidal Basin.
40	United States Capitol	NHL/NRHP	Views/vistas of the National Mall, the Tidal Pool, the Washington Monument; and other adjacent resources. Axial views up Pennsylvania Avenue NW and SE. Views to Union Station.
41	U.S. Capitol Gatehouses and Gateposts	NRHP	No contributing views. Gateposts flank 15 th Street and Constitution Avenue, NW in Washington Monument Grounds and President's Park. Gatehouse in SE corner of President's Park.
42	Smithsonian Building	NHL/NRHP	Views/vistas of the National Mall, within the National Mall. Views of the Potomac River from the waterfront.
43	White House	NHL/NRHP	Views/vistas along North-south axis, view along east-west axis; Andrew Jackson statue as focal point; corner statues as focal points; urban views to nearby squares; view to the Washington Monument
44	Georgetown Historic District	NHL/NRHP	Views/vistas of Rock Creek and Potomac Parkway.
45	Old Naval Observatory	NHL/NRHP	View of the Potomac River below Theodore Roosevelt Island, including Memorial Bridge, Arlington Cemetery, and Arlington House; view over Theodore Roosevelt Island and the Georgetown waterfront, including Key Bridge; view over West Potomac Park and the Lincoln Memorial.
46	Observatory Hill Historic District	NRHP	View to the National Mall/West Potomac Park; Reciprocal views to and from Arlington House/Arlington National Cemetery; Views from Memorial Bridge; View to Lincoln Memorial/West Potomac Park.
47	Pennsylvania Avenue National Historic Site	NRHP	Contributing resources include Old Post Office and Clock Tower. Views and vistas of the Pennsylvania Avenue National Historic Site.
48	Alban Towers Apartment Building	NRHP	Some of most "spectacular" views of city from property.
49	Alice Pike Barnley Studio House	NRHP	Not identified
50	All Souls Church, Unitarian	NRHP	Located at height ("important rise in the topography of the city along 15 th and 16 th Streets north of Florida Avenue known as Meridian Hill") in northwest Washington. Constructed adjacent to collection of grand Beaux-Arts style mansions and foreign legations surrounding a formal, Neo-Classical style park then under construction. Developers of area were inspired by City Beautiful movement to create enclave of architecturally notable buildings to replace modest Civil War era frame houses. Vision was to transform 16 th Street into "a ceremonial gateway to the White House".
51	American Institute of Pharmacy Building	NRHP	The building is visually integral part of ceremonial public spaces developed under McMillan Plan as extension of the Mall to the Potomac
52	Andrew Rankin Memorial Chapel, Frederick Douglass Memorial Hall, Founders Library	NRHP/NHL	Not identified
53	Arlington Heights Historic District	NRHP	Not identified

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
54	Arts and Industries Building	NRHP/NHL	On the Mall on east side of original Smithsonian building
55	Ashburton House	NRHP/NHL	View to Lafayette Square
56	Auditor's Building Complex	NRHP	Not identified
57	Aurora Highlands Historic District	NRHP	Views to Washington D.C.
58	Babcock-Macomb House	NRHP	Resource is oriented towards Massachusetts Avenue
59	Baker, Newton D., House	NRHP/NHL	Not identified
60	Banneker Recreation Center	NRHP	Relationship to Howard University across the street
61	Barr Building	NRHP	Views to and from Farragut Square
62	Bayly, Mountjoy, House	NRHP/NHL	Not identified
63	Beale, Joseph, House	NRHP	Views of recourse from Massachusetts Avenue and Sheridan Circle
64	Bond Building	NRHP	Relationship to New York Avenue axis between Mount Vernon Square and the White House to the downtown commercial grid; setting within the L'Enfant Plan
65	Cairo Apartment Building	NRHP	Views of downtown Washington and surrounding area.
66	Capitol Hill Historic District	NRHP	Views within the district, downtown Washington, and the surrounding area.
67	Cardozo, Francis L., Senior High School	NRHP	Views of monumental Washington, Arlington, and the broad Potomac River valley.
68	Cathedral Mansions Apartment Buildings	NRHP	Not identified
69	Central Heating Plant	NRHP	Views within Washington D.C.'s central business district and immediately adjacent neighborhoods, including the National Mall.
70	Chase's Theater and Riggs Building	NRHP	Not identified
71	Christ Church	NRHP	Not identified
72	Christ Church	NRHP	Views within Georgetown Historic District and immediately adjacent neighborhoods.
73	City Hall	NRHP/NHL	Not Identified
74	City Tavern	NRHP	Not identified
75	Cleveland Park Historic District	NRHP	Views within the district; views of the city center.
76	Clifton Terrace	NRHP	Views of the city of Washington, D.C.;
77	Codman-Davis House	NRHP	Not identified
78	Commercial National Bank	NRHP	Not identified
79	Constitution Hall	NRHP/NHL	View to eighteenth street between C and D streets, northwest. Otherwise not identified.
80	Corcoran Hall	NRHP	Not identified
81	Cosmos Club	NRHP	View south to Massachusetts Avenue.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
82	Customhouse and Post Office	NRHP	Not identified
83	Davidson Building	NRHP/NHL	Views from Dupont Circle neighborhood on the west side of nineteenth street, northwest, and north of south street.
84	District Building	NRHP	Not identified
85	District of Columbia Municipal Center and Plaza	NRHP	View from south of Judiciary Square and north of Indiana Avenue
86	Downtown Historic District	NRHP	View from northwest sector of the District of Columbia, between Pennsylvania Avenue and Mount Vernon Square; View from Market Square: a portion of Indiana Avenue between Market Square and Sixth Street, a portion of D Street between Seventh and Sixth Streets, a portion of E Street between Eighth and Seventh Streets, portions of G Street between Eleventh and Seventh Streets, portions of H Street between Eighth and Fourth Streets, portions of I Street between Eighth and Fifth Streets, portions of Eleventh Street between F and H Streets, portions of Eighth Street between Pennsylvania Avenue and I Street, portions of Sixth Street between G and I Streets, and portions of Fifth Street between G and I Streets View to the Pennsylvania Avenue National Historic Site/Market Square area
87	Dumbarton House	NRHP	View to historic Georgetown, District of Columbia; View to Rock Creek and the Q Street Bridge; View to nearby Evermay (erected in 1790s) and Dumbarton Oaks (which dates to 1801)
88	Duncanson-Cranch House	NRHP	Not identified
89	Dupont Circle Historic District	NRHP	Focal point of vistas to and from the Circle, part of original L'Enfant plan
90	Eastern Market	NRHP	Not identified
91	Embassy of Mexico--MacVeagh House	NRHP	Not identified
92	Euclid Apartments	NRHP	Not identified
93	Everglades, The	NRHP	Not identified
94	Evermay	NRHP	Distant views to Rock Creek Park and downtown Washington
95	Fifteenth Street Financial Historic District	NRHP	Located on axis with US Treasury
96	Foggy Bottom Historic District	NRHP	Not identified
97	Folger Shakespeare Library	NRHP	Setting is in Capital Hill section of city, close to Library of Congress
98	Forrest-Marbury House	NRHP	Not identified
99	Founders Library	NRHP/NHL	Not identified
100	Fourteenth Street Historic District	NRHP	Views within district and to immediately adjacent neighborhoods
101	Friendship House	NRHP	Not Identified

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
102	Fulford, The	NRHP	Views within Meridian Hill Subdivision, valued for its scenic views
103	Garfinckel's Department Store	NRHP	Not identified
104	George Washington Memorial Parkway	NRHP	Views of the city; Northern section protects scenic vistas into D.C. and along the corridor; Includes view of monumental core and skyline of Washington D.C., which was a central purpose for its establishment and continued protection
105	Georgetown Academy for Young Ladies	NRHP	Views within Georgetown Historic District; southward view of Georgetown, downtown Washington, the Potomac River, and beyond
106	Georgetown University Astronomical Observatory	NRHP	Not Identified
107	Glenn Arms, The	NRHP	Views within the Adams Morgan neighborhood and the Meridian Hill Subdivision, and immediately adjacent neighborhoods
108	Grace Protestant Episcopal Church	NRHP	Not Identified
109	Greater U Street Historic District	NRHP	Views within district and immediately adjacent neighborhoods
110	Halcyon House	NRHP	Not identified
111	Harbour Square	NRHP	Views to the Potomac River; views towards immediately adjacent neighborhoods; views of downtown Washington's monumental core, the Washington Channel and Anacostia River, Georgetown
112	Healy Building, Georgetown University	NRHP/NHL	Not identified
113	Heurich, Christian, Mansion	NRHP	Not identified
114	Hotel Washington	NRHP	Views along 15 th and F Streets and Pennsylvania Avenue, NW, including the White House; views within the Pennsylvania Avenue National Historic Site and the 15 th Street Financial Historic District
115	House at 2437 Fifteenth Street, NW	NRHP	Views of Meridian Hill Park, Sixteenth Street Historic District, and immediately adjacent neighborhoods.
116	Howard, Gen. Oliver Otis, House	NRHP	Views within Howard University and immediately adjacent neighborhoods.
117	Hughes, Charles Evans, House	NRHP/NHL	Views of Massachusetts Avenue and Sheridan Circle
118	Hume School	NRHP	Arlington Ridge neighborhood; view of Crystal City area, land surrounding school to remain open
119	Ingleside	NRHP	Mount Pleasant Neighborhood
120	Interior Department Offices	NRHP	Views of the Ellipse, Washington Monument, and National Mall
121	Kalorama Triangle Historic District	NRHP	Recognized as an area with a strong visual, distinct identity within three major thoroughfares, Connecticut Avenue, Calvert Street, and Columbia Road
122	Kennedy-Warren Apartment Building	NRHP	Views of Connecticut Avenue, Rock Creek Park, and Smithsonian National Zoological Park; surrounded on three sides by government-owned parkland
123	Key, Francis Scott, Bridge	NRHP	Views of Potomac River, Theodore Roosevelt Island, Three Sisters, North Highland and Rosslyn neighborhoods in VA, George Washington Memorial Parkway, K Street, C&O Canal, Georgetown neighborhood
124	Keystone, The	NRHP	Views of Pennsylvania Ave, 22 nd St, and Washington Circle
125	Lafayette Building	NRHP/NHL	Views of Lafayette Park, McPherson Square, the White House, Vermont Avenue, I Street, 15th Street, and H Street

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
126	Lafayette Square Historic District	NRHP/NHL	Views of the White House, Ellipse, Pennsylvania Avenue NW, I Street NW, H Street NW, 15 th Street, 16 th Street, 17 th Street, E Street NW, G Street NW, F Street NW, New York Avenue NW
127	Lisner Auditorium	NRHP	Views of George Washington University, H Street NW, and 21 st Street NW
128	Lyon Park Historic District	NRHP	Views of 10th Street North, Arlington Boulevard, North Irving Street, Washington Boulevard, and North Pershing Drive; Views of district including 1171 contributing features
129	Massachusetts Avenue Historic District	NRHP	Views of Massachusetts Avenue, Dupont Circle Historic District, Kalorama Historic Area, Sheridan Circle, Rock Creek, and Naval Observatory Complex
130	Memorial Continental Hall	NRHP/NHL	Views of 17th Street NW, the Ellipse, the White House, Washington Monument, National Mall
131	Meridian House	NRHP	Views of Meridian Hill Park, 16 th Street NW, 17 Street NW, Crescent Place, and Belmont Street NW
132	Meridian Manor	NRHP	Views of Chapin Street, 15th Street, 14th Street, Belmont Street, and Meridian Hill Park
133	Meridian Mansions	NRHP	Views of 16 th Street NW and Meridian Hill Park
134	Milton Hall	NRHP	Views of George Washington University, Washington Circle, 23 rd Street NW, and I Street NW
135	Miner Normal School	NRHP	Views of Georgia Avenue, Fairmont Street, Howard Place, and Howard University campus
136	Moran Building	NRHP	Views of G Street NW and 5 th Street NW
137	Mount Pleasant Historic District	NRHP	Views of 16th Street, Harvard Street; and Rock Creek Park
138	Mount Vernon Square Historic District	NRHP	Views of New York Avenue NW, 7 th Street NW, M Street NW, US Capitol
139	Mount Vernon Triangle Historic District	NRHP	Views of Massachusetts Avenue, 5 th , K, and I Streets, Cobb Park, US Capitol
140	Mount Zion United Methodist Church	NRHP	Views of 29 th Street NW and Georgetown Historic District
141	Mullett Rowhouses	NRHP	Contributing views not identified; Views exist within and beyond Foggy Bottom neighborhood
142	National Academy of Sciences	NRHP	Views to the south of wooded terraces by Charles Downing Lay in consultation with Bertram Goodhue; Views within and beyond Foggy Bottom neighborhood, near Lincoln Memorial and West Potomac Park
143	National Archives	NRHP	Views within and beyond the Pennsylvania Avenue National Historic Site
144	National Cathedral, The	NRHP	The National Cathedral is one of three “dominant visual focal points” in D.C; Views are expansive within and beyond the 57-acre landscaped site on top of Mount Saint Alban in Northwest Washington; View from the cathedral is “one of the most magnificent in the city”
145	National Geographic Society Headquarters	NRHP	Views exist within and beyond area of development of National Geographic Society between Sixteenth, Seventeenth and M Streets; Landscaped plaza adjacent to east
146	National Home for Destitute Colored Women and Children	NRHP	Views exist within and beyond Columbia Heights neighborhood, from the building’s “siting at the height of the hill”
147	National Metropolitan Bank Building	NRHP	Views to ceremonial route between Capitol and White House; Visually integrated with 15 th Street financial district
148	National War College	NRHP/NHL	Views exist within and beyond site of the Army War College and Washington Arsenal, with Washington Channel of the Potomac River and East Potomac Park to the west, Parade Ground to the north and Anacostia River to the south.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
149	Northumberland Apartments	NRHP	Visual significance noted for association with New Hampshire Avenue streetscape between Sixteenth Street and Florida Avenue, where diagonal intersecting roads of L'Enfant's plan define irregular shaped lots and short blocks with a variety of building types and styles considered to be unusual, rich and intact.
150	Old Woodley Park Historic District	NRHP	Located on high ground with reciprocal views to the east and south of Rock Creek Park, and the National Cathedral to the west; Views toward parklands
151	Olympia Apartments	NRHP	Views within and beyond the setting of the Columbia Heights neighborhood along 14 th Street, a historical major thoroughfare in and out of D.C.
152	Pan American Union	NRHP	Views within and beyond the 17 th Street corridor, on a 5-acre site, with "Blue Aztec" garden and reflecting pool and Van Ness House Stables
153	Pennsylvania Avenue National Historic Site	NRHP	View from downtown Washington; View of the White House and the Capitol
154	Penrose Historic District	NRHP	Not Identified
155	Pension Building	NRHP/NHL	View from downtown Washington; View from Fourth, Fifth, F, and G Street, otherwise not identified.
156	Phillips, Duncan, House	NRHP	View from Twenty-First Street and Q Street, NW; View of Dupont Circle, including the Larz Anderson House, the Cosmos Club, and the Indian Embassy
157	Potomac Electric Power Company Substation No. 25	NRHP	View from/to Adams Morgan neighborhood; View facing Champlain Street and Old Morgan School Place
158	President's Park South	NRHP	View to the White House grounds, Executive Avenue, Constitution Avenue, Sixteenth Street N.W; View to monuments in park, including The General William Tecumseh Sherman Monument, The First Division Monument, The Butt-Millet Memorial Fountain, The Second Division Memorial, The Zero Milestone, The Original Patentees of the District of Columbia Memorial, The Boy Scout Commemorative Tribute, The Haupt Fountains, The National Christmas Tree, and The Bulfinch Gatehouses
159	Prospect House	NRHP	View to the Potomac River
160	Quality Hill	NRHP	View south from NE corner of 35 th and Prospect St., Georgetown
161	Randall Junior High School	NRHP	Not Identified
162	Riggs--Tompkins Building	NRHP	Not identified
163	Riggs National Bank, Washington Loan And Trust Company Branch	NRHP	Not identified
164	Sewall-Belmont House National Historic Site	NRHP/NHL	Not identified
165	Sheridan--Kalorama Historic District	NRHP	View to the city; overlooks the steep grade of the Rock Creek Park
166	Sixteenth Street Historic District	NRHP	The Sixteenth Street Historic District is characterized by the linear experience Sixteenth Street, a Major Element of the L'Enfant Plan
167	Sixteenth Street Historic District (Boundary Increase)	NRHP	Vista south to the White House; stretch of 16th Street from from Lafayette Square to its current boundary at Florida Avenue on the north
168	Southeast Branch Library	NRHP	Not identified
169	Southern Railway Building	NRHP	Not identified

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
170	St. John's Church	NRHP/NHL	Not identified
171	St. Matthew's Cathedral And Rectory	NRHP	Not identified
172	Stockton Hall	NRHP	Not identified
173	Strivers' Section Historic District	NRHP	Not identified
174	Strong, Hattie M., Residence Hall	NRHP	Not identified
175	Sun Building	NRHP	Not identified
176	Supreme Court Building	NRHP/NHL	Not identified
177	Tiber Island	NRHP	Not identified
178	Tower Building	NRHP	Not identified
179	Trinity Towers	NRHP	Sited on one of city's highest points, offering commanding views of downtown from upper story apartments.
180	Tucker House and Myers House	NRHP	Not identified
181	Tudor Place	NHL/NRHP	View to Georgetown
182	Twin Oaks	NRHP	Not identified
183	U.S. Civil Service Commission Building	NRHP	Not identified
184	U.S. Department of Agriculture Administration Building	NRHP	View across Jefferson Drive to Mall lawn
185	U.S. Department of Agriculture Cotton Annex	NRHP	Not identified
186	U.S. Department of Housing and Urban Development	NRHP	View to southwest quadrant of Washington, D.C.; View from D Street, Seventh Street, Southwest Freeway, and L'Enfant Plaza/Ninth Street
187	U.S. Department of State Building	NRHP	View from D Street, C Street, 21st Street, and 23 rd Street
188	U.S. Department of the Interior	NRHP	View from C and E Streets and Eighteenth to Nineteenth Streets NW; View to the White House, DAR Constitutional Hall, the Red Cross Building, Simon Bolivar Park, Pan American Annex, the Office of Personnel Management, Rawlins park, and the old Interior Building (currently the General Services Administration)
189	Union Station	NRHP	View to the Capitol; View from the intersection of Massachusetts and Delaware Avenues
190	United Mine Workers of America	NRHP/NHL	View from Fifteenth Street, I Street, and Vermont Avenue; View to McPherson Square.
191	US Courthouse--District of Columbia	NRHP	View from Judiciary Square and Municipal Center complex; View from Constitution Avenue, Third Street, C Street, and John Marshal Place in northwest quadrant of the city; View toward National Mall
192	US Department of Agriculture South Building	NRHP	View from southwest quadrant of Washington, D.C.; View from Independence Avenue, C Street, Twelfth Street, and Fourteenth Street. View to the National Mall, the Washington Monument, the Freer Gallery, the Smithsonian Castle, and Paul Cret's Central Heating Plant – all prominent buildings in Washington, D.C.'s monumental core
193	US General Accounting Office Building	NRHP	Seven-story view, from square 518; View from G, H, Fourth, and Fifth Street

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
194	US Public Health Service Building	NRHP	View from Constitution Avenue, C Street, Nineteenth Street, and Twentieth Street, otherwise not identified
195	Vigilant Firehouse	NRHP	View from Wisconsin Avenue, view to C&O Canal
196	Wardman Park Annex and Arcade	NRHP	View to Rock Creek Park and the city; View from 140-foot above street level, hilltop site at the intersection of Woodley Road, N.W.; the eight-story wings radiating from spoke-like from its central octagonal tower provides all rooms with exterior views
197	Washington Heights Historic District	NRHP	View from northwest quadrant of the District of Columbia; View from general boundaries of Connecticut Avenue and Columbia Road, 18 th street, and Florida Street. Washington Heights is located on a rise that begins at Florida Avenue and continues northward to Columbia Road, where the topography becomes level.
198	Washington National Airport Terminal and South Hangar Line	NRHP	View to George Washington Memorial Parkway; View to the Potomac River; View to Roaches Run and Waterfowl Sanctuary; View toward Washington skyline
199	Watergate	NRHP	View to Potomac River and Rock Creek Parkway; View to Virginia Avenue to the northeast and New Hampshire Avenue to the southeast
200	Watterston House	NRHP	View from Capitol Hill National Register Historic District, View toward nearby Capitol, Supreme Court, and Library of Congress
201	Western High School	NRHP	View from 35 th and R Streets; View to Georgetown Historic District
202	Westory Building	NRHP	View from northeast corner of Fourteenth and F streets
203	White – Meyer House	NRHP	Views to and from Sixteenth Street
204	Willard Hotel	NRHP	View from Square 225; view from Pennsylvania Avenue
205	Wilson, Woodrow, House	NRHP/NHL	View from Embassy Row section of Northwest Washington
206	Windsor Lodge	NRHP/NHL	Not identified
207	Wire Building	NRHP	View to McPherson Square
208	Wyoming Apartments	NRHP	View to southwest Columbia Road at the juncture of Connecticut Avenue and California Street
209	1948 Southern Addition (Current Name)	Determined Eligible	Not identified
210	Abingdon (Historic/Current), Abingdon Ruins (Historic/Current)	Determined Eligible	Not identified
211	Al's Motors (NRHP Listing), Gold's Gym (Current)	NRHP; VLR	Not identified
212	Arlington Cinema and Drafthouse (Current Name), Arlington Theater (Historic)	DHR Staff: Potentially Eligible	View to Columbia Pike/Walter Reed Drive Commercial Historic District; occupies prominent location along the Columbia Pike Commercial Corridor.
213	Arlington Forest Historic District (Historic/Current)	NRHP; VLR	Streetscape views within the district; wooded setting within the district.
214	Arlington Hall Junior College (Historic), Arlington Hall Station Historic District (Current)	Determined Eligible	Axial views along the central path south to Building E and north to Buildings H and I and panoramic views from various points along the route of a former U-shaped drive that historically defined the Grove; view from central path toward Building D and reciprocal view north toward Building E and views along the historic paths toward the former fountain area; view within historic district and neighboring streets.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
215	Arlington Post Office (Historic/Current), Clarendon Post Office (Current)	NRHP; VLR	Designed as focal point of streetscape at intersection of North Hudson Street and Washington Boulevard; views within the Clarendon Commercial Historic District and neighboring streets; otherwise, not identified.
216	Arlington Service Center (Historic), NSF Arlington (Current), U.S. Naval Radio Station Arlington (Historic), U.S. Naval Radio Station Arlington Historic District (Descriptive)	DHR Staff: Potentially Eligible	Not identified
217	Arlington Village Historic District (Historic/Current)	NRHP; VLR	Views within the historic district and to adjacent streets; otherwise, not identified.
218	Arthur W. Walls House (Historic), Lomax African Methodist Episcopal Zion Church (NRHP Listing), Manse, 2704 S. 24th Road (Function/Location),	NRHP; VLR	Not identified
219	Barcroft Apartments (Historic), Building 18 (Historic), Multiple Dwelling, 1124- 1138 South Wakefield Street (Function/Location)	Determined Eligible	Views within surrounding Barcroft Apartments Historic District and to adjacent streets; otherwise, not indicated.
220	Barcroft Apartments (Historic), Commercial Building (Descriptive), Commercial Strip, 4700-4714 Columbia Pike (Function/Location)	Determined Eligible	Views within surrounding Barcroft Apartments Historic District and adjacent streets; otherwise, not identified.
221	Barcroft Apartments (NRHP Listing), Barcroft Apartments Historic District (Historic/Current)	NRHP; VLR	Views within the historic district and adjacent streets; otherwise, not indicated.
222	Barcroft Community House (Historic), Barcroft School House (Historic), St. Paul's Episcopal Church (Historic)	NRHP; VLR	Not identified.
223	Barcroft Historic District (Current)	Determined Eligible	Views within the historic district and adjacent streets; otherwise, not indicated.
224	Bridge #5020 (Current Name), State Bridge #5020 (NRHP Listing)	Determined Eligible	Views of Arlington National Cemetery; views of Memorial Avenue landscaping; designed to disappear into Memorial Avenue landscaping; views within Arlington Memorial Bridge Historic District and adjacent streets.
225	Buckingham Historic District and Boundary Increases (Historic/Current)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
226	Cabocel (Historic/Current), Colonial Village (Historic)	NRHP; VLR	Views within the residential complex and immediate vicinity; otherwise, not identified.
227	Caleb Cushing House (Historic), The Glebe (NRHP Listing)	NRHP; VLR	Located on an elevated position; views of and from the Waverly Hills Historic District; otherwise, not identified.
228	Calvert Manor (Historic)	NRHP; VLR	Not identified.
229	Carlin Springs (Historic), Glencarlyn Historic District (NRHP Listing)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
230	Charles Richard Drew House (NRHP Listing)	NHL, NRHP, VLR	Views to and from surrounding Penrose Historic District; otherwise, not identified.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
231	Cherrydale Fire Station #3 (Historic), Cherrydale Volunteer Fire House (Historic)	NRHP; VLR	Views to and from the surrounding Cherrydale Historic District; otherwise, not identified.
232	Cherrydale Historic District (Historic/Current)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
233	Clarendon Commercial Historic District (Historic/Current)	Determined Eligible	Views within the district and adjacent streets; otherwise, not identified.
234	Columbia Forest Historic District (Historic/Current)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified
235	Columbia Pike/South Walter Reed Drive Commercial Historic District (Current)	DHR Staff: Potentially Eligible	Views within the district and adjacent streets; otherwise, not identified
236	Green Valley Pharmacy (NRHP Listing), Hyman Grocery Store (Historic)	Determined Eligible	Not identified
237	Commercial Building, 919-927 South Walter Reed Drive (Function/Location), Elkins Building, Commercial Building, 2801-2811 Columbia Pike (Current Name)	DHR Staff: Potentially Eligible	Not identified
238	Eagle Automotives (Current Name), Filling Station (Historic)	DHR Staff: Potentially Eligible	Not identified
239	Filling Station (Historic), Shell/Liberty Gas Station (Current)	DHR Staff: Potentially Eligible	Not identified
240	Commons of Arlington (Historic/Current), Walter Reed Gardens Historic District (Historic/Current)	NRHP; VLR	View of adjacent streets; otherwise, not identified.
241	Dorchester Apartments (Current), Garden Apartment Complex, 1900 Columbia Pike (Function/Location)	DHR Staff: Potentially Eligible	Not identified
242	Dorothy Hamm Middle School (Current Name), H-B Woodlawn School (Historic/Current), Stratford Junior High School (NRHP Listing)	NRHP; VLR	Not identified
243	Garden Apartment Complex, 3710 Columbia Pike (Function/Location), Oakland Apartments (Current)	DHR Staff: Potentially Eligible	Views within the residential complex and immediate vicinity; otherwise, not identified.
244	Garden Apartment Complex, 4010-4032 Columbia Pike (Function/Location), Quebec Apartments (Current)	DHR Staff: Potentially Eligible	Views within the residential complex and immediate vicinity; otherwise, not identified.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
245	Glebe Center (Historic), Glebe Shopping Center (Current)	NRHP; VLR	Views of adjacent streets; otherwise, not identified
246	Halls Hill Historic District (Historic), High View Park (Current Name), Highview Park (Alternate Spelling)	Determined Eligible	Highest elevation in Arlington County; otherwise, not identified.
247	Harry Gray House (NRHP Listing), House, 1005 S. Quinn St. (Function/Location)	NRHP; VLR	Views within Arlington View neighborhood; otherwise, not identified.
248	House, 2306 North Richmond Street (Function/Location), Joseph J. Accardo House (Historic)	Determined Eligible	Not identified.
249	Key Boulevard Apartments (Historic)	Determined Eligible	Views of adjacent streets; otherwise, not identified.
250	Lee Gardens North Historic District (Historic/Current)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
251	Lyon Village Historic District (Historic/Current)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
252	Maywood Historic District (Historic/Current)	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
253	Monroe Courts Historic District	NRHP; VLR	Views within the district and adjacent streets; otherwise, not identified.
254	Mount Vernon Memorial Highway North Cultural Landscape Inventory (Current Name)	Determined Eligible	Views of Washington D.C. and monuments; views of Potomac River;
255	Old Dominion Historic District (Historic/Current)	Determined Eligible	Views within district and adjacent streets; views of Washington D.C.; views of Potomac River;
256	Old Warehouse Area and Ground Maintenance Complex (Function/Location)	DHR Staff: Potentially Eligible	Limited views within the surrounding Arlington National Cemetery Historic District; otherwise, not identified.
257	Parkfairfax Historic District (Historic/Current)	NRHP; VLR	Pastoral vistas in areas between or behind groups of buildings out of sight of the roads; tree-lined streetscapes; views within the surrounding historic district.
258	Reeb Hall (Historic), Unitarian Church of Arlington (Historic/Current), Unitarian Universalist Church of Arlington (NRHP Listing)	NRHP; VLR	Views of surrounding hilly, wooded setting; otherwise, not identified.
259	Wakefield Manor Apartments (Historic/Current), Wakefield Manor Garden Apartment Complex (Historic/Current)	Determined Eligible	Not identified.
260	Waverly Hills Historic District (Historic/Current)	NRHP; VLR	Views within the historic district and adjacent streets; otherwise, not identified.
261	Waycroft-Woodlawn Historic District (Historic/Current)	Determined Eligible	Views within the historic district's wooded setting and adjacent streets; otherwise, not identified.

Map ID	Resource Name	NRHP Designation	Contributing Views/Vistas
262	Frederick Douglass National Historic Site	NRHP	Panoramic distant views toward the monumental core and south west waterfront; visual relationship between Douglass House and street; View east from bay window of Douglass House; view south from bay window of Douglass House

Sources: Army National Military Cemeteries and Virginia State Historic Preservation Officer (2026); Arlington National Cemetery et al. (n.d. [2026]); Bobeczko and Robinson (1998); Dillon (1972); EDAW, Inc. (1992a, 1992b); EHT Tracerics, Inc. and Stantec (2018); Frisbie et al. (2024); Krakow (1993); McIntosh (1979, 1980a, 1980b); National Park Service (2004, 2005, 2006a, 2006b, 2009a, 2009b, 2015, 2016, 2018a, 2018b, 2022a, 2022b, 2024); Pfanz (1980, 1981); Robinson et al. (2016); Seagraves et al. (1980); Scott (1977); Smith et al. (2013); Virginia Polytechnic Institute and State University (2009); (Adams 1982); (Adams 1983); (Adams 1989a); (Adams 1989b); (Adams 1989c); (Adams 1989d); (Adams 2009); (Adams and Christian 1976); (Albee et al. 2005); (Alexander et al. 1976a); (Alexander et al. 1976b); (Allen et al. 1990); (Barsoum 1994a); (Barsoum 1994b); (Barsoum 1994c); (Barsoum 1994d); (Barsoum 1994e); (Barsoum 1994f); (Barsoum 1995a); (Barsoum 1995b); (Barsoum 1995c); (Beauchamp 1973); (Beauchamp 1974); (Beauchamp 1977); (Beauchamp 1978a); (Beauchamp 1978b); (Beauchamp 1980); (Beauchamp 1983a); (Beauchamp 1983b); (Beauchamp 1993); (Beauchamp 2001); (Beauchamp and Adams 1983); (Bird 1991a); (Bird 1991b); (Brasell 2006a); (Brasell 2006b); (Brassel 2006c); (Brassel 2006d); (Brassel 2006e); (Breiseth et al. 2007); (Brown 1973a); (Brown 1973b); (Brown 1973c); (Brown 1973d); (Brown 1973e); (Brown 1973f); (Boese 2016); (Callcott 1994); (Callcott 1995a); (Callcott 1995b); (Closs 1986); (DC Preservation League 2009); (DC Preservation League 2015); (Eig 1987); (Eig and Mueller 1989); (Eig and Williams 1994); (EHT Tracerics 1983); (EHT Tracerics 2008); (Erem et al. 2008); (Field et al. 1990); (Flynn and Hughes 2006a); (Flynn and Hughes 2006b); (Flynn and Hughes 2006c); (Franklin 1979); (Friedlander and Bowers 1984); (Gamble and Redburn 1972); (Gamble et al. 1972a); (Gamble et al. 1972b); (Ganschinietz 1971a); (Ganschinietz 1971b); (Ganschinietz 1971c); (Ganschinietz 1971d); (Ganschinietz 1971e); (Ganschinietz 1971f); (Ganschinietz 1971g); (Ganschinietz 1971h); (Ganschinietz 1972a); (Ganschinietz 1972b); (Ganschinietz 1972c); (Ganschinietz 1972d); (Ganschinietz 1973a); (Ganschinietz 1973b); (Ganschinietz 1974); (Ganschinietz 1976); (Ganschinietz 1979); (Ganschinietz ; 1982); (Ganschinietz 1984a); (Ganschinietz 1984b); (Ganschinietz 1985); (General Service Administration 1978); (Gentry 2018a); (Gentry 2018b); (Gerson and Ganschinietz 1972); (Harper 2005); (Helwig 1978); (Helwig ; 1979); (Helwig and Ganschinietz 1978); (History Matters 2002); (Hooper et al. 1994); (Hughes 1987); (Hughes and Moffett 2000); (Hughes et al. 2001a); (Hughes et al. 2001b); (Jones et al. 2022); (Krakow 1993); (Levy 1973); (Lowe 2000); (Mackintosh 1979); (Marzella 2015); (Marzella et al. 2018); (McClane 2022); (McDermott 1970); (Milner 1973); (Morton 1971a); (Morton 1971b); (Morton 1971c); (Pitts 1986); (Poh 1974); (Pousson and Williams 2009); (Pousson and Williams 2012); (Pousson and Williams 2015); (Pousson and Williams 2016); (Rebeck 1986); (Riggle 2003); (Robinson and Gasparini 2008); (Robinson and Kerr 2003); (Schroer et al. 1977); (Schroer et al. 1980); (Scott 1984); (Sefton 2012); (Sefton 2018); (Sefton 2019); (Sefton and Williams 2005); (Snyderman 1987); (Snyderman 1988); (Snyderman 1990a); (Snyderman 1990b); (Snyderman 1991); (Sommerville 1985); (Taylor 1969a); (Taylor 1969b); (Taylor 1969c); (Taylor 1969d); (Taylor 1970a); (Taylor 1970b); (Taylor 1970c); (Taylor 1970d); (Taylor 1971); (Trieschmann 1999); (Trieschmann 2006); (Trieschmann and Hughes 1995); (Trieschmann et al. 1998); (Trieschmann et al. 2006); (Virginia Historic Landmarks Commission 1979); (Weeks 1986); (Williams 2005); (Williams 2012); (Williams 2016); (Williams 2020); (Wood 1987); (Young 2013); (Young et al. 2015); Albee and Trieschmann (2002, 2003); Bird (1985); Bobeczko (1998); Didden, Trieschmann, and Weidlich (2001); EHT Tracerics Inc. (2007, 2008); Hallock (2003); Hallock and Trieschmann (2003); Licese-Torres (2004); Moffett (2002); Riggle and Trieschmann (2003); Ritson (2014); Shrimpton (1997); Trieschmann (2003); Virginia Department of Historic Resources (2003).

NRHP = Designated listed/eligible for the National Register of Historic Places; NHL = National Historic Landmark; VLR = Virginia Landmarks Register Listing; DHR = Virginia Department of Historic Resources

Determined Eligible resources = Determined NRHP Eligible by DHR Staff; DHR Board; or that have been issued a Federal Determination of Eligibility.

Appendix L - Assessment of Adverse Effect

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Memorial Avenue Corridor Cultural Landscape	A, B, C, D, F, G	The proposed undertaking would be prominently visible throughout the resource. The proposed undertaking would adversely affect the corridor's setting, context and viewshed, including the obstruction of distant views that characterize the historic resource, and which serve as a defining feature of the corridor, including: the view of the Washington Monument from various locations along the corridor; view to Hemicycle and Arlington House; view to Lincoln Memorial; and views to the Capitol dome and other resources of the D.C. monumental core from Memorial Circle. Due to proposed illuminations the undertaking would be visible at night. Memorial Avenue corridor is architecturally significant as a mile-long axial composition. Memorial Circle is the one portion of the Memorial Avenue composition that was not designed by McKim Mead and White architectural firm; the circle is attributed to Gilmore Clarke, an early designer of the American Parkway. With the proposed undertaking, the corridor would be physically altered with an intrusion that changes the circulation patterns, and contributing viewsheds, and modifies the design continuity of the corridor. The corridor is identified as meeting moderate rather than high integrity, although its primary architectural features are identified as retaining high integrity. With the proposed undertaking, these architectural resources may be adversely affected. In addition, the proposed undertaking may result in the loss of contributing landscape elements. The pines at the four pylons near Memorial Circle are identified as contributing to the cultural landscape and may be adversely affected. The granite block paving surfaces, along the bridges as well as appearing in triangular islands to the east and west of Memorial Circle, are also contributing elements and should be retained.	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Arlington Memorial Bridge and Associated Features	C	The proposed undertaking would be prominently visible throughout the resource. Views from the resource and to the resource, as well as the bridge's immediate setting would be altered. Due to proposed illuminations the undertaking would be visible at night. The Arlington Memorial Bridge historic resource encompasses architectural, landscape, and sculptural features to the east and west, including Memorial Circle. The bridge and associated features serve as a symbolic linkage of the North and South by connecting the Lincoln Memorial and Arlington House. With the proposed undertaking, this balanced architectural relationship would be altered, and the visual continuity would be obstructed. The sculptural and landscape elements that define Memorial Circle, including two sets of 35-foot-tall granite pylons and the circulation pattern, circular lawn and annual floral plantings, would be removed or diminished. The design continuity of Memorial Drive is also a contributing element of the resource.	The proposed undertaking would result in adverse effects to the historic property.
Lady Bird Johnson Park Cultural Landscape	A, C	The island's significance is tied to its central role in the axial composition linking the Lincoln Memorial with the entrance to Arlington National Cemetery. The main axis of Arlington Memorial Bridge, Memorial Circle, and Boundary Channel Extension bridge are as originally built, with medium integrity, and are significant for their design as well as their association with the history of the American parkway. The proposed undertaking would affect the circulation of Memorial Circle, a contributing resource of the cultural landscape. Anticipated construction staging is planned for a portion of the park, which may alter contributing vegetation. The proposed undertaking would physically obstruct contributing views within the landscape and along Arlington Memorial Bridge, and it would alter views to resources such as Arlington House, Lincoln Memorial, the Potomac River, and Arlington Memorial Bridge. Due to proposed illuminations the undertaking would be visible at night.	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Arlington National Cemetery Historic District	A, B, C, D, F, G	The proposed undertaking would alter and partially obstruct contributing views from Arlington House and Kennedy Gravesite to Lincoln Memorial and Washington Monument. The undertaking would also alter contributing views to and from Memorial Amphitheater from various locations. The proposed undertaking would alter contributing views of ANC from the Lincoln Memorial, Memorial Bridge, Memorial Drive. Due to proposed illuminations the undertaking would be visible at night. Sections 43, 60 and 66 of the Arlington National Cemetery were assessed in further detail due to the sensitivity of these grounds. According to visual analyses, the proposed undertaking would be visible from ground level at Section 43 but would not be visible from Section 60 or 66. The proposed undertaking would result in effects to contributing resources in the Arlington National Cemetery Historic District, including circulation system resources that are identified as contributing to the historic district and contributing monuments adjacent to the proposed site. Adverse effects from the proposed undertaking would also result from the partial obstruction of the resource's visual relationship with Lincoln Memorial and the Memorial Avenue Corridor. The axial relationship of the historic property to other major monuments is integral to its historic significance.	The proposed undertaking would result in adverse effects to the historic property.
Arlington House Historic District	A, B, C, D	The proposed undertaking would alter contributing views east from Arlington House. There is potential that the proposed undertaking would partially obstruct views of Lincoln Memorial and Arlington Memorial Bridge from Arlington House. Due to proposed illuminations the undertaking would be visible at night. Arlington House is oriented with long views toward Washington D.C. This relationship to Washington D.C. and the Potomac is a character-defining feature of the resource. Contributing resources in the historic district also derive significance from their orientation and views toward the Potomac River and Washington D.C.	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Arlington House (Robert E. Lee Memorial)	A, B, C, D	The proposed undertaking would alter contributing views east from Arlington House, disrupting the symbolic spatial relationship between Arlington House, the Lincoln Memorial and the Memorial Avenue Corridor. Due to proposed illuminations the undertaking would be visible at night.	The proposed undertaking would result in adverse effects to the historic property.
Arlington House Cultural Landscape	A, B, C, D, F	The proposed undertaking would alter contributing views from and to the resource, including the view between the house and Washington D.C. Due to proposed illuminations the undertaking would be visible at night.	The proposed undertaking would result in adverse effects to the historic property.
Lyndon B. Johnson Memorial Grove	A, C	The resource would have views of the proposed undertaking. Primary views from the resource are generally eastward across the Potomac River and views of the undertaking would therefore not be prominent but may have an adverse effect to the setting.	The proposed undertaking may result in adverse effects to the historic property.
Mount Vernon Memorial Highway Historic District	A, C	The resource's setting would be changed with the proposed undertaking. Due to proposed illuminations the undertaking would be visible at night. The proposed undertaking would occupy the northern terminus of the resource, altering circulation patterns in this designed landscape.	The proposed undertaking would result in adverse effects to the historic property.
Lincoln Memorial Cultural Landscape	A, C	The setting and context of the cultural landscape would be adversely affected by the loss of contributing vistas as well as the altered character of the landscape and built environment in westward views from the Lincoln Memorial grounds. Due to proposed illuminations the undertaking would be visible at night. The proposed undertaking would result in an adverse effect to the reciprocal views between the Lincoln Memorial and Arlington House, which are identified as a contributing resource in the cultural landscape.	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Lincoln Memorial	A, B, C,	The Lincoln Memorial west façade is oriented toward the proposed undertaking. Views across the river would therefore be altered by the proposed undertaking. Due to proposed illuminations the undertaking would be visible at night. The resource is significant for its architectural design, as a major element of the McMillan Commission Plan to form the western terminus of the Mall composition and as the northeastern terminus of an axis that extends across the Arlington Memorial Bridge to Arlington House. The proposed undertaking would result in an adverse effect to the Lincoln Memorial as it would change the interrelationships of the existing monumental landscape, which forms an intentional balance between natural and built features, axial and picturesque landscape elements.	The proposed undertaking would result in adverse effects to the historic property.
National Mall Site and National Mall Historic District	A, C, D, F	The character of views of the Potomac River would be altered with the proposed undertaking, as the proposed undertaking introduces a feature that is dissimilar to its surroundings on the west side of the river. Due to proposed illuminations the undertaking would be visible at night. The resource includes grounds and memorials that derive significance from their distant views, with designs and orientations that rely on direct views of civic monuments.	The proposed undertaking would result in adverse effects to the historic property.
The Mall Cultural Landscape	A, B, C	The character of views of the Potomac River would be altered with the proposed undertaking, as the proposed undertaking introduces a feature that is dissimilar to its surroundings on the west side of the river. Due to proposed illuminations the undertaking would be visible at night. The resource includes grounds and memorials that derive significance from their distant views, with designs and orientations that rely on direct views of civic monuments.	The proposed undertaking would result in adverse effects to the historic property.
World War II Memorial	F, G	The resource would be visible at ground level from a location at the northeast end of the fountain	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Martin Luther King Jr. Memorial	F, G	The proposed undertaking would not adversely affect the resource's contributing views, due to distance, the topography of the site, and intervening vegetation and buildings. Primary views from the memorial are southeast to the Jefferson Memorial. The undertaking would therefore not be prominent or direct.	No adverse effect is anticipated.
Lockkeeper's House and C&O Extension	A, C	The resource is located on the south side of Constitution Avenue, situated with its primary elevation-oriented north and away from the proposed undertaking.	No adverse effect is anticipated.
56 Signers Memorial	F, G	No adverse effects.	No adverse effect is anticipated.
Washington Monument	A, C, D	The proposed undertaking would be visible from the contributing grounds immediately north of the Monument, thereby altering the setting and contributing vistas from the Washington Monument. Due to proposed illuminations the undertaking would be visible at night.	The proposed undertaking would result in adverse effects to the historic property.
Washington Monument and Grounds Historic District	A, C, B, F, G	Views from the top of the monument are a contributing resource and would be altered with the proposed undertaking. The grounds and base of the monument would include direct views of the proposed undertaking. Due to proposed illuminations the undertaking would be visible at night.	The proposed undertaking would result in adverse effects to the historic property.
Washington Monument and Grounds Cultural Landscape	A, C, F	The context and setting of the resource would be adversely affected by the proposed undertaking, due to the visibility of the proposed undertaking. The proposed undertaking would be illuminated and visible at night. Views to the monument are identified as a contributing resource; these views would be altered and obstructed by the proposed undertaking, resulting in an adverse effect to the cultural landscape.	The proposed undertaking would result in adverse effects to the historic property.
Rock Creek and Potomac Parkway Historic District	A, C	Views southwest toward Memorial Bridge are a contributing resource in the Historic District and would be altered with the proposed undertaking. The proposed undertaking would be illuminated and visible at night.	The proposed undertaking would result in adverse effects to the historic property.
Civil War Monuments in Washington, D.C.	A, C	Civil War Monuments include the Ulysses S. Grant Memorial. Views west along the primary mall axis from the front of the Grant Monument near the U.S. Capitol would not include the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
East and West Potomac Park Historic District	A, B, C, F, G	Contributing views from the resource are generally oriented toward the Tidal Basin as well as vistas from built resources within the parks. However, the West Potomac Park riverfront would have direct views of the proposed undertaking. The proposed undertaking would be illuminated and visible at night.	The proposed undertaking would result in adverse effects to the historic property.
American Revolutionary Statuary in the District of Columbia	A, C	The resource includes the John Paul Jones Memorial. Due to the distance of this resource from the proposed undertaking site, and the diminished visibility, this resource would not experience adverse indirect effects.	No adverse effect is anticipated.
Mount Vernon Memorial Highway Cultural Landscape - North of Alexandria	C	The proposed undertaking would be visible from the resource, although it would not affect contributing views.	No adverse effect is anticipated.
Cuban Friendship Urn	B, C	The proposed undertaking would not be visible.	No adverse effect is anticipated.
Franklin Delano Roosevelt Memorial	F, G	The proposed undertaking would not be visible, due to the topography of the site as it is lower than the surrounding land to the west.	No adverse effect is anticipated.
L'Enfant Plan of the City of Washington, District of Columbia	A, B, C	Views toward the Lincoln Memorial are a contributing resource and would be altered with the proposed undertaking. The proposed undertaking would be illuminated and visible at night, disrupting the composition of reciprocal views that characterize the resource. The proposed undertaking would disrupt the 160-foot height limit that has preserved the broad, horizontal nature of the city and that was central to the original L'Enfant Plan and subsequent modifications, including those of the McMillan Plan. The Lincoln Memorial is defined as the western terminus of the National Mall; the proposed undertaking would disrupt this balance.	The proposed undertaking would result in adverse effects to the historic property.
Arlington Ridge Park	A, C, F, G	Situated on a ridge with long views across the Potomac River, to the monumental core, southeastern views from the site would include the proposed undertaking. The proposed undertaking would be illuminated and visible at night.	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Pentagon	A, B, C	Contributing views, including the views to and from Washington D.C from the east and north terraces, would include the proposed undertaking. Views of the resource from the south may also include the proposed undertaking. The proposed undertaking would be illuminated and visible at night. The northeastern and eastern facades of the Pentagon are designed to capture unobstructed vistas of Washington D.C.'s Monumental Core across the Potomac River, with large terraces including the River Entrance Terrace and Mall Entrance Terrace, the parade ground, and landscaping that are designed to interface with these views. The proposed undertaking would be constructed within this contributing viewshed.	The proposed undertaking would result in adverse effects to the historic property.
Fort Myer NHL District	A	The proposed undertaking would not be prominently visible from the resource, due to differentiation in elevation and intervening tree cover. However, the undertaking would be visible in some conditions from Buffalo Soldier Avenue and the open field west of McNair Road. The proposed undertaking would be illuminated and visible at night.	The proposed undertaking would result in adverse effects to the historic property.
Quarters 1, Fort Myer	A, B, C	The proposed undertaking would not be visible.	No adverse effect is anticipated.
Theodore Roosevelt Island	A, C, D, F	The island is characterized by thick vegetation and the Theodore Roosevelt Memorial bridge is an intervening structure between the site and proposed undertaking.	No adverse effect is anticipated.
Washington Canoe Club	A, C	The proposed undertaking would not be visible.	No adverse effect is anticipated.
George Mason Memorial	A, F	Contributing view from the George Mason Memorial Sculpture to the Inlet Bridge. In leaf off condition, the proposed undertaking would potentially be visible, including at night due to planned illumination.	The proposed undertaking would result in adverse effects to the historic property.
Thomas Jefferson Memorial	A, C, F	The resource would have views of the proposed undertaking from the front steps and plaza to the north and the ground and walkway to the west of the memorial.	The proposed undertaking would result in adverse effects to the historic property.
Thomas Jefferson Memorial Cultural Landscape	A, C	The resource would have views of the proposed undertaking from the front steps and plaza to the north and the ground and walkway to the west of the memorial.	The proposed undertaking would result in adverse indirect effects to the historic property.
DC War Memorial Cultural Landscape	A, F	The resource is within a park setting of mature trees that largely block long views to the west.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
United States Capitol	A, C	The proposed undertaking would be visible from the upper stories of the Capitol building, thereby altering contributing views. The proposed undertaking would be illuminated and visible at night.	The proposed undertaking would result in adverse effects to the historic property.
U.S. Capitol Gatehouses and Gateposts	C	The proposed undertaking would not be visible from the resource.	No adverse effect is anticipated.
Smithsonian Building	A, C	The proposed undertaking would not be visible.	No adverse effect is anticipated.
White House	A, C	The proposed undertaking would not be visible from the resource.	No adverse effect is anticipated.
Georgetown Historic District	A, C, D	The proposed undertaking would be visible from multiple locations in the historic district, altering the waterfront views that define the resource.	The proposed undertaking would result in adverse effects to the historic property.
Old Naval Observatory	A, B, C	Visible from the grounds as well as upper levels of the building, the proposed undertaking would adversely affect the resource's contributing views, including reciprocal views with Arlington National Cemetery. Views at night would include the illuminated resource.	The proposed undertaking would result in adverse effects to the historic property.
Observatory Hill Historic District	A, B, C, D	The proposed undertaking would adversely affect the resource's contributing views, including reciprocal views with Arlington House and Arlington National Cemetery. Views at night would include the illuminated resource.	The proposed undertaking would result in adverse effects to the historic property.
Pennsylvania Avenue National Historic Site (Old Post Office and Clock Tower)	A, C	The proposed undertaking would not adversely affect the resource's significance views, due to the property's orientation and primary views as well as its distance from the proposed undertaking. Distant views of the resource from the west would not be adversely affected.	No adverse effect is anticipated.
Alban Towers Apartment Building	A, C	Views to D.C. are character-defining and would be changed with the proposed undertaking. The proposed undertaking would be distant but visible from the resource.	The proposed undertaking would result in adverse effects to the historic property.
Alice Pike Barnley Studio House	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
All Souls Church, Unitarian	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
American Institute of Pharmacy Building	C*	The undertaking would be visible from the area at the primary elevation of the building, and would alter the resource's character-defining relationship to the McMillan Plan.	The proposed undertaking would result in adverse effects to the historic property.
Andrew Rankin Memorial Chapel, Frederick Douglass Memorial Hall, Founders Library	A, B	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Arlington Heights Historic District	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Arts and Industries Building	A,C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Ashburton House	A*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Auditor's Building Complex	A,C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Aurora Highlands Historic District	A,C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Babcock--Macomb House	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Baker, Newton D., House	A,B*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Banneker Recreation Center	A,C	The proposed undertaking would not be visible from the ground level nor would it be visible from the level of the recreation center, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Barr Building	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Bayly, Mountjoy, House	A,B*	The resource is oriented southeast, away from the proposed project site, and would therefore not retain direct views of the proposed undertaking.	No adverse effect is anticipated.
Beale, Joseph, House	C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Bond Building	A,C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Cairo Apartment Building	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Capitol Hill Historic District	A, C*	The historic district is located at a distance from the proposed undertaking and views would likely be obstructed by intervening buildings, including the Capitol Building	No adverse effect is anticipated.
Cardozo, Francis L., Senior High School	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Cathedral Mansions Apartment Buildings	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Central Heating Plant	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Chase's Theater and Riggs Building	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Christ Church	A, C*	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Christ Church	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
City Hall	A, B*	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
City Tavern	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Cleveland Park Historic District	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Clifton Terrace	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Codman-Davis House	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Commercial National Bank	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Constitution Hall	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Corcoran Hall	C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Cosmos Club	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Customhouse and Post Office	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Davidson Building	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
District Building	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
District of Columbia Municipal Center and Plaza	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Downtown Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Dumbarton House	A*, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Duncanson-Cranch House	C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Dupont Circle Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Eastern Market	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Embassy of Mexico--MacVeagh House	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Euclid Apartments	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Everglades, The	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Evermay	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Fifteenth Street Financial Historic District	A, C	Views to the proposed undertaking would likely be diminished by intervening buildings and vegetation.	No adverse effect is anticipated.
Foggy Bottom Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Folger Shakespeare Library	A, C	Views to the proposed undertaking would likely be diminished by intervening buildings and vegetation.	No adverse effect is anticipated.
Forrest-Marbury House	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Founders Library	A, B	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Fourteenth Street Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Friendship House	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Fulford, The	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Garfinckel's Department Store	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
George Washington Memorial Parkway	B, C	The proposed undertaking would be visible, introducing a change to the contributing views. The undertaking would be illuminated at night, which would also present a change to the setting and views from the parkway.	The proposed undertaking would result in adverse effects to the historic property.
Georgetown Academy for Young Ladies	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Georgetown University Astronomical Observatory	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Glenn Arms, The	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Grace Protestant Episcopal Church	C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Greater U Street Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Halcyon House	C	The primary elevation and the adjacent property at ground level would have direct views of the proposed undertaking.	The proposed undertaking would result in adverse effects to the historic property.
Harbour Square	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Healy Building, Georgetown University	C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Heurich, Christian, Mansion	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Hotel Washington	C	Views from the resource to the proposed undertaking would likely be diminished or obstructed by intervening buildings and vegetation.	No adverse effect is anticipated.
House at 2437 Fifteenth Street, NW	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Howard, Gen. Oliver Otis, House	A, B*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Hughes, Charles Evans, House	B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Hume School	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Ingleside	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Interior Department Offices	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Kalorama Triangle Historic District	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Kennedy--Warren Apartment Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Key, Francis Scott, Bridge	C	The resource's contributing views would include the proposed undertaking. Views of Potomac River, Theodore Roosevelt Island, George Washington Memorial Parkway would be altered with the proposed undertaking. The planned illuminations would also substantially alter nighttime views from the bridge.	The proposed undertaking would result in adverse effects to the historic property.
Keystone, The	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Lafayette Building	A, B	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Lafayette Square Historic District	A, B, C	Views from the resource to the proposed undertaking would likely be diminished or obstructed by intervening buildings and vegetation.	No adverse effect is anticipated.
Lisner Auditorium	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Lyon Park Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Massachusetts Avenue Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Memorial Continental Hall	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Meridian House	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Meridian Manor	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Meridian Mansions	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Milton Hall	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Miner Normal School	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Moran Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Mount Pleasant Historic District	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Mount Vernon Square Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Mount Vernon Triangle Historic District	A, C, D	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Mount Zion United Methodist Church	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Mullett Rowhouses	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
National Academy of Sciences	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
National Archives	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
National Cathedral, The	A, C*	The proposed undertaking would be visible and would alter the contributing long distance views from the resource	The proposed undertaking would result in adverse effects to the historic property.
National Geographic Society Headquarters	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
National Home for Destitute Colored Women and Children	A	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
National Metropolitan Bank Building	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
National War College	A, C*	The resource is characterized by distant views, which would include the proposed undertaking and may introduce an adverse effect to the property.	The proposed undertaking would result in adverse effects to the historic property.
Northumberland Apartments	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Old Woodley Park Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Olympia Apartments	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Pan American Union	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Pennsylvania Avenue National Historic Site	A, C	Views from the resource to the proposed undertaking would likely be diminished or obstructed by intervening buildings and vegetation.	No adverse effect is anticipated.
Penrose Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Pension Building	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Phillips, Duncan, House	A*, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Potomac Electric Power Company Substation No. 25	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
President's Park South	A*	Views from the resource to the proposed undertaking would likely be diminished or obstructed by intervening buildings and vegetation.	No adverse effect is anticipated.
Prospect House	In progress B*, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Quality Hill	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Randall Junior High School	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Riggs--Tompkins Building	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Riggs National Bank, Washington Loan And Trust Company Branch	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Sewall-Belmont House National Historic Site	A, C*	Views from the resource to the proposed undertaking would likely be diminished or obstructed by intervening buildings and vegetation.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Sheridan--Kalorama Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Sixteenth Street Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Sixteenth Street Historic District (Boundary Increase)	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Southeast Branch Library	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Southern Railway Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
St. John's Church	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
St. Matthew's Cathedral And Rectory	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Stockton Hall	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Strivers' Section Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Strong, Hattie M., Residence Hall	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Sun Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Supreme Court Building	A,C*	Views from the resource to the proposed undertaking would likely be diminished or obstructed by intervening buildings and vegetation.	No adverse effect is anticipated.
Tiber Island	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Tower Building	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Trinity Towers	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Tucker House and Myers House	C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Tudor Place	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Twin Oaks	A, B*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
U.S. Civil Service Commission Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
U.S. Department of Agriculture Administration Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
U.S. Department of Agriculture Cotton Annex	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
U.S. Department of Housing and Urban Development	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
U.S. Department of State Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
U.S. Department of the Interior	A*, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Union Station	A	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
United Mine Workers of America	A, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
US Courthouse--District of Columbia	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
US Department of Agriculture South Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
US General Accounting Office Building	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
US Public Health Service Building	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Vigilant Firehouse	A*, C	The proposed undertaking would be visible from the resource and may alter the resource's relationship to its setting.	The proposed undertaking would result in adverse effects to the historic property.
Wardman Park Annex and Arcade	A*, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Washington Heights Historic District	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Washington National Airport Terminal and South Hangar Line	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Watergate	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Watterston House	A*, B, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Western High School	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Westory Building	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
White – Meyer House	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Willard Hotel	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Wilson, Woodrow, House	A*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Windsor Lodge	A*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Wire Building	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Wyoming Apartments	A*, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
1948 Southern Addition (Current Name)	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Abingdon (Historic/Current), Abingdon Ruins (Historic/Current)	D	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Al's Motors (NRHP Listing), Gold's Gym (Current)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Arlington Cinema and Drafthouse (Current Name), Arlington Theater (Historic)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Arlington Forest Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Arlington Hall Junior College (Historic), Arlington Hall Station Historic District (Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Arlington Post Office (Historic/Current), Clarendon Post Office (Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Arlington Service Center (Historic), NSF Arlington (Current), U.S. Naval Radio Station Arlington (Historic), U.S. Naval Radio Station Arlington Historic District (Descriptive)	A, B	The proposed undertaking would only be visible from the top of the radio tower, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Arlington Village Historic District (Historic/Current)	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Arthur W. Walls House (Historic), Lomax African Methodist Episcopal Zion Church (NRHP Listing), Manse, 2704 S. 24th Road (Function/Location),	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Barcroft Apartments (Historic), Building 18 (Historic), Multiple Dwelling, 1124-1138 South Wakefield Street (Function/Location)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Barcroft Apartments (Historic), Commercial Building (Descriptive), Commercial Strip, 4700-4714 Columbia Pike (Function/Location)	Not identified	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Barcroft Apartments (NRHP Listing), Barcroft Apartments Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Barcroft Community House (Historic), Barcroft School House (Historic), St. Paul's Episcopal Church (Historic)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Barcroft Historic District (Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Bridge #5020 (Current Name), State Bridge #5020 (NRHP Listing)	C	The proposed undertaking would be visible from the resource and may alter the resource's relationship to its setting.	The proposed undertaking would result in adverse effects to the historic property.
Buckingham Historic District and Boundary Increases (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Cabocel (Historic/Current), Colonial Village (Historic)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Caleb Cushing House (Historic), The Glebe (NRHP Listing)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Calvert Manor (Historic)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Carlin Springs (Historic), Glencarlyn Historic District (NRHP Listing)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Charles Richard Drew House (NRHP Listing)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Cherrydale Fire Station #3 (Historic), Cherrydale Volunteer Fire House (Historic)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Cherrydale Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Clarendon Commercial Historic District (Historic/Current)	A, C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Columbia Forest Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Columbia Pike/South Walter Reed Drive Commercial Historic District (Current)	C	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Green Valley Pharmacy (NRHP Listing), Hyman Grocery Store (Historic)	A, B	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Commercial Building, 919-927 South Walter Reed Drive (Function/Location), Elkins Building, Commercial Building, 2801-2811 Columbia Pike (Current Name)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Eagle Automotives (Current Name), Filling Station (Historic)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Filling Station (Historic), Shell/Liberty Gas Station (Current)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Commons of Arlington (Historic/Current), Walter Reed Gardens Historic District (Historic/Current)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Dorchester Apartments (Current), Garden Apartment Complex, 1900 Columbia Pike (Function/Location)	A, C*	The proposed undertaking would only be visible from the rooftop level, and therefore views to and from the resource would not be adversely affected by the proposed undertaking.	No adverse effect is anticipated.
Dorothy Hamm Middle School (Current Name), H-B Woodlawn School (Historic/Current), Stratford Junior High School (NRHP Listing)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Garden Apartment Complex, 3710 Columbia Pike (Function/Location), Oakland Apartments (Current)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Garden Apartment Complex, 4010-4032 Columbia Pike (Function/Location), Quebec Apartments (Current)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Glebe Center (Historic), Glebe Shopping Center (Current)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Halls Hill Historic District (Historic), High View Park (Current Name), Highview Park (Alternate Spelling)	A	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Harry Gray House (NRHP Listing), House, 1005 S. Quinn St. (Function/Location)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
House, 2306 North Richmond Street (Function/Location), Joseph J. Accardo House (Historic)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Key Boulevard Apartments (Historic)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Lee Gardens North Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Lyon Village Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Maywood Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Monroe Courts Historic District (NRHP Listing)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Mount Vernon Memorial Highway North Cultural Landscape Inventory (Current Name)	A, C	The proposed undertaking would be visible from the resource and may alter the resource's relationship to its setting.	The proposed undertaking would result in adverse effects to the historic property.

Resource Name	Criteria of Significance	Adverse Effects	Summary of Adverse Effects
Old Dominion Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Old Warehouse Area and Ground Maintenance Complex (Function/Location)	A, C*	The resource would be visible from the lawn and walkway areas along Lewis Drive and may alter the resource's relationship to its setting.	The proposed undertaking would result in adverse effects to the historic property.
Parkfairfax Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Reeb Hall (Historic), Unitarian Church of Arlington (Historic/Current), Unitarian Universalist Church of Arlington (NRHP Listing)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Wakefield Manor Apartments (Historic/Current), Wakefield Manor Garden Apartment Complex (Historic/Current)	C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Waverly Hills Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Waycroft-Woodlawn Historic District (Historic/Current)	A, C	The resource would not retain views of the proposed undertaking.	No adverse effect is anticipated.
Frederick Douglass National Historic Site	A, B	The proposed undertaking would be visible from the resource and may alter the resource's relationship to its setting. The resource would be visible from a location immediately west of the Caretaker's Cottage, and from a point along the brick walkway to the north. The site is beyond the APE and is located 4.3 miles from the project site.	The proposed undertaking would result in adverse effects to the historic property.