THE SECRETARY OF THE INTERIOR
WASHINGTON

November 5, 2026

Mr. Travis Voyles
Vice Chairman
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Re: Response to ACHP Final Comments – Proposed Triumphal Arch at Memorial Circle (ACHP Case #025123)

Dear Mr. Voyles:

Thank you for the Advisory Council on Historic Preservation's (ACHP's) October 9, 2026, final comments concerning the proposed Triumphal Arch at Memorial Circle. The Department of the Interior (Department) recognizes its responsibilities under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, its implementing regulations at 36 CFR Part 800, and Section 110(f) of the NHPA, 54 U.S.C. § 306107. As noted in my October 9, 2026, correspondence, the Department committed to considering the ACHP's comments in reaching a final decision. The Department has since considered those comments in developing its proposed decision regarding the undertaking. Consistent with 36 CFR § 800.7(c)(4), this letter provides a summary of the Department's proposed decision, including the rationale for the decision and evidence of consideration of the ACHP's comments.

Summary of the Proposed Decision

The undertaking considered in this response is the Triumphal Arch, as described in the National Park Service's (NPS's) September 22, 2026, correspondence to the ACHP and the related project record. The undertaking includes construction of the Triumphal Arch within Memorial Circle, associated plaza and landscape improvements, utility and stormwater infrastructure, traffic and pedestrian circulation modifications, security features, lighting, and temporary construction staging and laydown areas.

In reviewing the undertaking and developing a proposed decision on the implementation of the Triumphal Arch, the Department has considered the ACHP's recommendations, the Section 106 consultation record, the NPS's Final Assessment of Effect, the October 2026 Revised Environmental Assessment and the associated Finding of No Significant Impact, the views of consulting parties and the public, and the avoidance, minimization, and mitigation measures developed through the Section 106 consultation process.

In summary, the Department is proposing to implement the Triumphal Arch Project at Memorial Circle, located within the George Washington Memorial Parkway, a unit of the National Park System. 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. NPS executed a Finding of No Significant Impact on October 9, 2026, documenting the determination that the proposed Triumphal Arch would not result in significant environmental effects. Before the Department issues a final decision, the NPS will prepare a Non-Impairment Determination, which would include a determination of whether the action will harm the integrity of park resources or values to the degree that constitutes impairment under the NPS Organic Act and NPS Management Policies 2006.

The Department carefully considered the ACHP's October 9, 2026, final comments in developing its proposed decision regarding the proposed Triumphal Arch at Memorial Circle, consistent with 36 CFR § 800.7(c)(4). Particular consideration was given to the ACHP's recommendations concerning compliance with Section 110(f) of the NHPA, the avoidance and minimization of adverse effects to National Historic Landmarks (NHLs), the protection of Arlington National Cemetery's historic and ceremonial character, the development and implementation of mitigation measures, and the views expressed by consulting parties and the public. In evaluating these recommendations, the Department reviewed the Final Assessment of Effect, the alternatives considered, the identified adverse effects to historic properties, and the measures available to minimize and mitigate those effects. In reaching its proposed decision, the Department carefully weighed the undertaking's effects on historic properties against the public interest it serves. The Department recognizes that the undertaking will alter certain views, setting, and spatial relationships associated with nearby historic properties, resulting in adverse effects that cannot be fully avoided at the proposed location. On balance, the Department has concluded that the undertaking serves an important public interest by commemorating 250 years of American independence, reinforcing the ceremonial significance of the Memorial Avenue corridor, and providing new opportunities for public education, contemplation, and appreciation of the Nation's history. In reaching this conclusion, the Department also considered the measures necessary to minimize these effects, protect the solemn character of Arlington National Cemetery, and support the continued preservation and interpretation of affected historic properties for future generations. The Department is committed to implementing appropriate measures to minimize and mitigate these effects, consistent with its responsibilities as a steward of the Nation's historic and cultural resources.

Response to ACHP Comments

This section reflects the Department's consideration of, and response to, the ACHP's October 9, 2026, final comments on the undertaking.

Compliance with Section 110(f) of the NHPA

The ACHP recommended that NPS continue to detail and provide any additional information available on its efforts to meet the requirements of Section 110(f) of the NHPA, 54 U.S.C. § 306107, regarding adverse effects on NHLs. The Department recognizes the heightened preservation responsibilities established under Section 110(f) of the NHPA, which requires federal agencies, to the maximum extent possible, to undertake such planning and actions as may be necessary to minimize harm to NHLs. The NPS undertook an extensive identification and effects assessment that included 261 historic properties within the Area of Potential Effects, including 31 NHLs. The Final Assessment of Effect identifies adverse effects to six NHLs: the Fort Myer NHL District, Georgetown Historic District, National War College, Old Naval Observatory, Pentagon, and United States Capitol.

The NPS considered the possibility that adverse effects to these NHLs could be minimized through alternative locations and changes in the scale and design of the Arch, but concluded that these changes would not minimize adverse effects while meeting the purpose and need of the undertaking.

Smaller Arch designs were considered but not selected because they would less effectively preserve the historic views between the Lincoln Memorial and Arlington National Cemetery. By contrast, the proposed proportions and central opening retain views through the structure.

Alternative locations outside Memorial Circle were not carried forward because they would separate the undertaking from the historic planning basis for its location. The NPS determined that the undertaking is location-dependent because its purpose is to establish a commemorative feature at Memorial Circle that responds to historic planning precedent while celebrating the Nation's 250th anniversary and the important role of the Nation's military achieving and sustaining the freedoms and liberty we enjoy today. While alternative locations were evaluated for their potential to reduce effects to historic properties, the Department concluded that relocation outside Memorial Circle would not fulfill the undertaking's specific commemorative and location-dependent purpose.

Measures incorporated into the project design also reduce adverse effects on NHLs, including the use of shielded and low spill lighting and required noise reduction measures during pile driving.

Accordingly, the Department preliminarily concludes that the proposed Arch design, together with the avoidance and minimization measures reflected in the record, will minimize harm to NHLs to the maximum extent possible, consistent with Section 110(f).

Maintaining the Status and Significance of Arlington National Cemetery

The ACHP recommended that the Department detail what steps the Department intends to take to address adverse effects on Arlington National Cemetery, to ensure that the Cemetery will maintain its ability to convey its status and significance as a solemn resting place for those who have served our nation.

The Department recognizes the unique national significance of Arlington National Cemetery as a solemn historic, commemorative, ceremonial, and funerary landscape. The consultation record identifies adverse effects principally associated with changes to contributing views, setting, feeling, and association. The Department recognizes that the significance of this landscape extends beyond its individual physical features and includes its ceremonial function, historic associations, and symbolic relationship to national unity, sacrifice, and remembrance.

The NPS would develop specific construction-management and operational measures in coordination with Arlington National Cemetery and other responsible federal agencies. These measures would address construction noise and vibration, ceremonial activities, traffic and funeral procession access, pedestrian circulation, security, visitor management, and protection of adjacent historic resources.

The NPS evaluated views from a range of locations within the Cemetery, focusing particularly on higher-elevation areas and locations with long-range views toward the Potomac River and the monumental core. That analysis found that the Triumphal Arch would be visible from some locations, but it would not be visible from Sections 35, 60, or 66, or from the Tomb of the Unknown Soldier.

The undertaking would not alter cemetery operations, burial activities, or funeral processions. Construction-related noise and visual effects would be temporary, and the required noise reduction measures would substantially reduce construction noise within the Cemetery. To minimize construction-related noise and protect the solemn and ceremonial character of Arlington National Cemetery, the NPS would require the use of noise-reduction measures including noise blankets or curtains surrounding pile-driving equipment, which represents the loudest anticipated construction activity. Noise modeling presented in the Revised Environmental Assessment indicates that these measures could reduce noise levels by an average of approximately 28 decibels at certain locations within the Cemetery, with most areas remaining below the 57 dBA hourly equivalent sound-level threshold evaluated in the assessment. The NPS would also coordinate with Arlington National Cemetery to identify scheduled funerals, ceremonies, and other sensitive activities and, to the extent practicable, adjust the timing of higher-noise construction activities to minimize interference. Additional measures could include the use of quieter equipment where feasible, construction noise monitoring, and adjustments to work activities when necessary to protect the Cemetery’s ceremonial functions.

Following construction, the continuing effects would principally consist of changes to historic views and visual relationships identified in the Final Assessment of Effect. Those effects would not alter Arlington National Cemetery’s continuing commemorative, ceremonial, and funerary functions or its role as a national memorial landscape.

The Department anticipates that the undertaking will maintain Arlington National Cemetery’s ability to convey its status and significance as a solemn resting place for those who have served our nation.

Implementation of Mitigation Measures

The ACHP recommended that, if the Department proceeds with the undertaking, it should determine and communicate the next steps for carrying out and implementing any mitigation measures addressing adverse effects to NHLs and other historic properties. The ACHP also noted that several measures identified during consultation, including data recovery, interpretive materials, and educational opportunities, would benefit from additional detail to ensure that they are effective.

The Department agrees that careful development of implementation details will be critical to the effectiveness of these mitigation measures and appreciates the ACHP's offer to provide advice on the implementation of mitigation measures. The Department will communicate applicable implementation details as those measures are developed and carried forward through further design and through construction of the proposed project, and will carefully consider any additional recommendations that the ACHP may provide in future regarding these mitigation measures.

Certain avoidance and minimization measures are already incorporated into the undertaking, as described in the Final Assessment of Effect and Revised Environmental Assessment, including construction noise reduction measures and lighting design measures to reduce effects on surrounding historic properties.

Other measures identified during Section 106 consultation address construction management, archaeological resources, documentation of affected historic properties and views, landscape improvements, interpretation, and educational opportunities. As the Department moves towards implementing these measures, the Department is committed to taking into account ACHP input, public interest, applicable professional standards, and the subject matter expertise of the Department's staff and of our partner agencies and consulting parties to ensure that these measures are designed and implemented effectively.

Consideration of Public Views and Other Comments

The ACHP noted that the Department has the responsibility to seek and consider the views of the public in making its decision; recommended that the Department continue to assess the use of 36 CFR § 800.3(g) for undertakings that have the potential to adversely affect historic properties of national significance and generate a large degree of public interest; provide further detail or opportunities to consider comments from consulting parties as the undertaking proceeds; and provide details of how its decision on this undertaking recognizes the public interest and its views, and how the agency will ensure the affected historic properties for which it is a steward will be maintained and enriched for future generations.

The Department agrees that seeking and considering the views of the public was an important part of the decision-making process for this undertaking. The NPS provided multiple opportunities for consulting parties and members of the public to review the undertaking, comment on its effects on historic properties, and provide views on alternatives and potential mitigation. The consultation record reflects substantial participation by consulting parties and the

public, including approximately 107,000 comments submitted to the NPS during the consultation process and additional comments submitted directly to the ACHP. The Department acknowledges the additional comments received by the ACHP and the views expressed by consulting parties, including both State Historic Preservation Officers, preservation organizations, federal agencies, and other interested stakeholders.

The comments addressed a range of topics, including location, height, massing, architectural form, historical planning precedent, viewsheds, alternatives, archaeological resources, construction effects, and adequacy of proposed measures to avoid, minimize, or mitigate adverse effects. These comments have informed the identification of historic properties; expansion of the Area of Potential Effects; assessment of adverse effects (including additional analysis of historic views and of effects to Arlington National Cemetery); and consideration of potential mitigation measures.

The Department did not rely on 36 CFR § 800.3(g) for this undertaking as neither SHPO agreed to expedite the process under § 800.3(g). However, for future undertakings, the NPS plans to continue to assess the use of this provision when the proposed undertaking involves effects to nationally significant historic properties or NHLs, or when the effects are likely to be adverse.

The Department appreciates the ACHP's recommendation to provide details of how the Department's decision on this undertaking recognizes the public interest and its views, and how the agency will ensure the affected historic properties for which it is a steward will be maintained and enriched for future generations. The Department recognizes that consulting parties and members of the public expressed a range of views regarding the proposed location and design, including whether adverse effects could be avoided while accomplishing the undertaking's purpose. Those views have been considered as part of the decision-making process. The Department's ultimate decision will reflect consideration of the full administrative record, including the effects identified, alternatives evaluated, mitigation and minimization measures considered, and the views submitted by consulting parties and the public.

The Department recognizes that the historic and commemorative landscapes of our Nation's Capital are among the most significant expressions of our shared national heritage. These places connect generations of Americans to the principles of liberty, unity, sacrifice, and service upon which our country was founded. As the United States commemorates 250 years of independence, the proposed Triumphal Arch presents an opportunity to honor those enduring principles while creating a new destination for public enjoyment, education, contemplation, and reflection. Situated within the historic ceremonial corridor linking the Lincoln Memorial, Arlington Memorial Bridge, and Arlington National Cemetery, the Arch is intended to provide visitors with an additional perspective from which to appreciate the Nation's history, its monumental landscape, and the ideals that continue to guide its future. For these reasons, any decision to approve the Arch will recognize and advance the public interest and will ensure that the priceless landscapes which the Department stewards will be maintained and enriched for future generations.

Rationale for the Decision

The Department's proposed decision reflects the purpose and need identified for the undertaking and the historic role of Memorial Circle and Memorial Avenue as a ceremonial gateway. The purpose of the proposed Triumphal Arch is to commemorate the 250th anniversary of American independence by honoring the Nation's founding principles through the construction of a monumental arch at Memorial Circle. The undertaking is intended to reinforce the historic and ceremonial role of the Arlington Memorial Bridge and Memorial Avenue corridor as a symbolic gateway between Washington, D.C., and Arlington National Cemetery, while providing a new destination for public interpretation, reflection, and appreciation of the Nation's history, including the essential role in our heroic military victories securing our freedoms. The Department considered a no-action alternative, alternative locations, and changes in the scale and design of the Arch. The Department determined that alternative locations would not retain the undertaking's relationship to the historic planning and ceremonial context of Memorial Circle, and that smaller designs would less effectively preserve historic views. The selected design retains historic views through the Arch's central opening and incorporates measures to avoid and minimize identified effects. After considering the purpose and need, alternatives, design rationale, adverse effects, and avoidance, minimization, and mitigation measures reflected in the record, the Department determined that the undertaking represents the appropriate alternative for purposes of its proposed decision.

Consistent with 36 CFR § 800.7(c)(4), the Department will provide this letter to consulting parties and make it available to the public.

The Department appreciates the ACHP's careful consideration of this nationally significant undertaking and its recommendations for protecting historic properties associated with the Nation's monumental and commemorative landscape. Thank you again for the ACHP's participation and input throughout this process.

Sincerely,



Doug Burgum
Secretary of the Interior