SOCIETY OF ARCHITECTURAL HISTORIANS

November 4, 2026

Mr. William Scharf
Chair, National Capital Planning Commission (NCPC)
401 Ninth Street NW, Suite 500N
Washington, DC 20004

Re: New Monumental Arch Project, NCPC File Number: 8778

Dear Chair Scharf and NCPC Commissioners:

At its November 5, 2026, meeting, the National Capital Planning Commission (NCPC) is scheduled to vote on approval of final site and building plans for the proposed Monumental Arch in Memorial Circle, Washington, D.C. (NCPC File No. 8778), submitted by the U.S. Department of the Interior. The Commission has invited public input to inform their review, and we, the Heritage Conservation Committee of the Society of Architectural Historians (SAH), respectfully submit the following comments for the Commission's consideration.

SAH is a nonprofit membership organization founded in 1940, with headquarters in Chicago, IL, that serves an international network of institutions and individuals who focus on the history of the built environment and its role in shaping contemporary life. As the leading scholarly organization for architectural historians in North America, SAH limits its advocacy to matters of national and international importance.

The proposed 250-foot Monumental Arch is in Memorial Avenue Corridor, a nationally significant cultural landscape that extends between the Lincoln Memorial in Washington, D.C., and the Arlington National Cemetery in Arlington, Virginia. SAH previously voiced its concerns about this proposal via written and oral testimony at both the concept and preliminary review stage of this project in June and July of 2026.[1] The project has now been resubmitted to NCPC for final approval. Based on our review, the applicant has done little to nothing to address the substantial adverse impacts caused by this project to our nation's most significant historic sites. The applicant's own assessments have continually noted that adversely affected historic properties include six National Historic Landmarks (NHLs), eight historic districts, eight cultural landscapes, and twenty individual or other types of historic properties. The applicant further noted that archaeological resources, which are still being identified, would also be adversely affected by the undertaking.[2] The project has also generated a huge amount of expert and public commentary in opposition to the project. Yet, the applicant has disregarded these concerns, instead asking the ACHP to (and ultimately being successful in) terminating the Section 106 process that could have mitigated the adverse impacts through a process of consultation and collaboration.

We ask that NCPC vote **not to approve** this project. We offer the following brief comments for our recommendation, and refer you to our more substantive commentary on these issues included in our prior (June/July) letters:

1. The applicant's claim included in the submission that the architectural history of this site supports the construction of monumental triumphal arches is incorrect. In fact, as enumerated in our June 2026 letter, the 1901 McMillan Plan and its further development throughout the early 20th century leading up to and beyond the construction of Memorial Circle, has constantly upheld that any structures built within this corridor should not interfere with the sightlines between Lincoln Memorial and Arlington House, and that they be low-profile. The two unbuilt 166-foot-tall columns from the 1920s, that the applicant has been utilizing to justify congressional

approval, location and height of this 250-foot monumental arch, were completely dissimilar in intent, design, size, height, proportion and location. Most importantly, they avoided many of the adverse impacts, especially to viewsheds, that this project has.

2. The applicant has not provided any compelling justification for why this project needs to be in this location where it causes harm to so many existing historic resources. Surely, there are multiple viable sites in Washington DC (as suggested by various consulting parties in the terminated Section 106 consultation), which would have met the goal of memorializing America's 250th anniversary, without causing irreparable harm to our country's revered and designated historic sites.
3. The project suffers from various unresolved questions around materials, transportation, pedestrian safety, to name a few, all of which were raised by your own NCPC staff reports. The applicant's response to these concerns, submitted as part of the final approval package, falls woefully short. For most questions, the applicant notes that they will be resolved in future phases of the project. This indicates that the applicant is not ready for final approval and NCPC should exercise its due diligence in requesting and deliberating on this information when it is ready.
4. The applicant's complete disregard of overwhelming commentary from the public and various civic and cultural organizations in the country in opposition to this project sets an alarming precedent. It undermines the intent of the National Historic Preservation Act, passed by Congress to protect our cultural resources, and the democratic ideal that the views of the public are essential to informed federal decision making.

We urge the NCPC to exercise its mandated authority and meet its stated mission to "to preserve and enhance the extraordinary historical, cultural, and natural resources and federal assets of the National Capital Region, to support the needs of the federal government and enrich the lives of the region's visitors, workers, and residents."[3] This project falls short on multiple fronts and NCPC should not grant its final approval.

Sincerely,



Priya Jain, AIA
Chair, Society of Architectural Historians (SAH) Heritage Conservation Committee
Members, SAH Heritage Conservation Committee: Fallon Samuels Aidoo, Ph.D.; Kathryn E. Holliday, Ph.D., Margarita Jerabek, Ph.D., Daniel Leckie, PMP, Mary Rzepczynski, Shuyi Yin, Ph.D., Günce Uzgören, Ph.D.
Ben Thomas, Ph.D. (ex-officio)

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[1] Priya Jain (and Society of Architectural Historians Heritage Conservation Committee) to William Scharf (National Capital Planning Commission), June 1, 2026, https://sah.org/2026/06/02/sah-statement-on-proposed-monumental-arch-in-memorial-circle-in-washington-dc/ (accessed June 2, 2026), and July 8, 2026, https://sah.org/2026/07/08/sah-submits-comments-to-national-capital-planning-commission-regarding-proposed-monumental-arch-project/ (accessed Nov 4, 2026).
[2] National Park Service, U.S. Department of the Interior, *Truimphal Arch at Memorial Circle: Assessment of Effects Report*, June 2026, https://www.ncpc.gov/files/download.php?id=7862 (accessed June 22, 2026).
[3] National Capital Planning Commission, "Mission Statement," https://www.ncpc.gov/about/ (accessed Nov 4, 2026).