Public Comments for New Monumental Arch

Total comments: 32

October 30, 2026

Name: Loretta Bolton
Date: October 30, 2026 10:45:14 pm

Subject: Public Comment regarding the Proposed 250-Foot Arch near Arlington National Cemetery
Dear Members of the National Capital Planning Commission,
I am writing to express my strong opposition to the construction of the proposed 250-foot Arch near Arlington National Cemetery.
As a concerned citizen, I urge the Commission to vote against this project during the upcoming meeting on November 5. The proposed structure would directly encroach upon more than 40 historic properties within the sacred memorial landscape surrounding the cemetery, permanently altering an area of profound national significance.
Our nation's preservation laws represent a fundamental promise to protect the places that hold our shared American history. Allowing a massive 250-foot structure to disrupt this solemn landscape contradicts the core principles of careful planning, genuine public participation, and responsible stewardship.

Name: Nancy Pindus
Date: October 30, 2026 9:15:04 pm

Please do not go forward with the building of this Arch. It destroys iconic views of our national’s capital for residents and visitors and disrespects the history of our country and the sacrifice of those who fought for our country’s values. Furthermore, what does this say about our government and democracy when one man’s whim takes precedence over government by the people and for the people? The proposal to build the Arch was never presented to Congress for debate and Congress has not approved the allocation of taxpayer dollars for this purpose. Changes as massive and costly as the proposed Arch are not easily undone, so there must be a firm NO as soon as possible.
Thank you.

Name: Randal Klefbeck
Date: October 30, 2026 8:09:30 pm

This is an absolute waste of space, tax dollars, and area around a sacresact portion of our nation's history for the self aggradizement of one idividual. I has no place nor purpose near this location other than the aforementioned. If it goes forward, it will be a blight to the eye, block other important sightlines to the current monument, and use money that is infinitely better spent on our national parks in other parts of the country. I most strongly object to this project.

Name: Steve Morgan
Date: October 30, 2026 6:41:19 pm

DO NOT ALLOW THE ARCH! Do not, Do not allow a shadow over our servicemen that have given their lives for our country! DO NOT DO NOT ALLOW THE ARCH!

Name: Debbie Jones-Steele
Date: October 30, 2026 6:15:02 pm

National Capital Planning Commission
401 9th Street, NW, Suite 500N
Washington DC, 20004
Dear Committee Members,

I recently learned that Arlington National Cemetery (ANC) is considered by Road Scholar to be one of the world's 17 hauntingly beautiful cemeteries alive with history. Twelve countries are represented on this list. Six of the cemeteries are located in the United States and four – including ANC - are national cemeteries. It is in our country's DNA to honor those who have served in life by treating them in death with compassion and dignity in thoughtful and respectful surroundings. Prior to the 1800's churchyards served as burial grounds. The rural or garden cemetery movement began when city churchyards became crowded past their capacity, resulting in severe health concerns. Locations and landscape design were deliberate choices which played an important role in structuring these modern cemeteries. This trend preceded the development of dedicated public parks, hence cemeteries often served a dual purpose. Not only could the bereaved visit the grave side of loved ones but others were welcome to gather and even picnic while respectfully enjoying the park like settings. From the beginning graveyards housed the dead and provided mourners a place to express their sorrow in safety and comfort.
This combination of finding joy in life while grieving is a condition shared by most of us but expressed in very different ways. People visit cemeteries for a variety of reasons. Some bring their newborn babies to meet a much loved relative or friend, some go to share exciting news, some go to talk, some go to simply sit nearby, some weep, some may even list a litany of grievances. After the Uvalde school massacre the NYTimes printed a picture of a 5th grader dancing to a recently released Taylor Swift single at the graveside of her best friend who had not survived the shooting. In another issue they featured the image of a young woman at ANC lying across the grave of her fiancé who was recently killed in the Afghan war. The love and loss conveyed in both photos is human and heartfelt.
Grief is real, personal, and part of the fabric of our lives. It is characterized by sadness but also joy, love, and fond memories. Allowing people the space to feel it and express it in an appropriate setting must be considered and respected. We should not only honor our fallen comrades but should not forget the bereaved. Their needs deserve to be considered as well. Not only would the construction process intrude upon their visits but the arch, itself, would disrupt the relationship of Memorial Circle and ANC with their environs. The sense of place is formidable. The somberness and serenity are calming, welcoming and comforting enhancing the solemnity for those lying on the hill above as well as their visitors. Chaos has no place in this journey.
In addition to being garish, the arch as planned, will be an eyesore, jarringly out of scale with its surroundings. Memorial Circle is perfect as it is. All I ask is that you leave it be. Let the fallen rest and their mourners grieve in peace.
Debbie Jones-Steele, November 5, 2026

Name: David Jaworski
Date: October 30, 2026 5:21:00 pm

How can you vote in favor of building the Monumental Arch when the US Treasury needs to borrow money to pay its bills. Congress has not authorized funding of this project.
A better use of the funds earmarked for the New Monumental Arch would be to use the funds to improve the operating rooms at the Veterans Administration hospitals and improve the diagnostic tools needed to treat our veterans and improve their health.

I recommend that you do not approve this project and inform the Administrations that the funds would be better spent on the veterans projects I listed.

If you need to discuss my recommendations further, please reach out to me at the email address I have provided.

Regards,
David J Jaworski

Name: Cynthia Landecker
Date: October 30, 2026 5:17:26 pm

As an American who is proud of the beautiful federal buildings and memorials in Washington, D.C., and as an American who has two family members buried in National Cemeteries in Texas and California, I view the proposed monumental arch with dismay and disgust. Destroying the existing sight lines and viewpoints of the present entrance to Arlington would be to commit a crime against American history and the values of those who created this great country and those who died for serving it.

This gigantic travesty of a structure would actually cast shade on the graves of heroes. This is revolting. The idea of justifying the arch by using it to house defense installations is ludicrous.

I ask the members of the National Capital Planning Commission to put aside any petty personal considerations and to make your decisions with respect and patriotism in your hearts. Vote no” on this proposal in its entirety.

Cynthia Landecker

Name: Brian Arcuri
Date: October 30, 2026 4:45:25 pm

I reject this proposal to build this arch. If anything I should be built elsewhere and I find the one nation under God inscription offensive. E pluribus unum should be on it. It should be located far away from the mall and Arlington national Cemetery.

Name: Maureen Koetz
Date: October 30, 2026 4:44:05 pm

Please find attached a letter to the Chairman, all NCPC members, and its General Counsel outlining the possible violations of law associated with the NCPC approving this project, including potential criminal violations of the Conspiracy to Defraud and Anti-Deficiency Acts as well as the US Constitution.

We appreciate your assuring this assessment is distributed to all NCPC members before the hearing on November 5th.

Thank you.

Attachment

Name: Ann Trowbridge
Date: October 30, 2026 4:19:07 pm

Little has materially changed since the public's overwhelmingly negative feedback to the initial design submission which is very disappointing though expected.

However, once erected, Trump's tasteless, ill-placed and costly arch can be torn down if more serious people are chosen to lead our government. What will suffer forever is the public's confidence in the federal project review process and the ability of the CFA, NCPC, and ACHP to effect better solutions when they have lowered the bar this much to approve this president's highly questionable vanity projects.

Name: Joe Murchison
Date: October 30, 2026 4:07:54 pm

I was fortunate enough to be able to visit France last month (September). Paris is beautiful as always. It was fun to see the Arc de Triomphe again. It is a massive structure. The idea that President Trump wants to build an arch that is 52% higher than the Arc de Triomphe strikes me as so excessive as to be a monstrosity. I totally oppose the planned arch.

Name: Linda Cowell
Date: October 30, 2026 4:05:13 pm

I think it's disgusting to consider building an Arch for a President that never served in the Armed Forces. Arlington honors fallen heroes and that is what it stands for.

Name: Karen E Santiano Francis
Date: October 30, 2026 3:47:09 pm

Attached are my written comments, which I will be giving during the commission meeting on Nov 5

Attachment

Name: Gerald Serventi
Date: October 30, 2026 3:20:05 pm

My comments are simple. The is no need for this arch. we are not now celebrating a great victory or coming together of ideas. The area is special as is tying Arlington and what it means to the Lincoln memorial and rest of Washington DC. There is no need for a tall structure to do that. And finally there is no real threat on the Capital that we need a location for military hardware and another obstacle near the National Airport.

Please turn the application down.

Name: Susan Murany
Date: October 30, 2026 3:18:41 pm

I am a tour guide in this area and have led many tours in Arlington Cemetery. This is our national cemetery, truly hallowed ground, where we lay those who gave all. They deserve to be respected and seen without distraction. This unnecessary arch, a project of a president who has called our soldiers "suckers" and "losers," will not only overwhelm the visitors to the cemetery, but will distract from their solemn remembrance and reverence. This arch is purposely meant to do this. President John F. Kennedy had remarked while taking in the view of the city from outside the Arlington House shortly before his assassination, " It is so magnificent, I could stay here forever." Adding an eternal flame to the current president's arch makes a mockery of our 35th president. Please do not allow permission to build this vanity project.

Name: Andrea Avni
Date: October 30, 2026 1:33:27 pm

Commission Members:

To be blunt, there is no acceptable reason to waste taxpayer money on an ugly unnecessary monument to one sociopath’s ego. In a traffic circle. Obstructing historic view corridors.

All the “arguments” about national security and snipers on top and ammo stored within are ridiculous on their face.

Americans oppose this monstrosity.

Do not approve it.

Name: Julie Collier
Date: October 30, 2026 1:26:43 pm

Public Comment – Julie A Collier
Alexandria, VA resident, Virginia resident since 1987

I have had the honor of driving across Memorial Bridge for over 39 years to and from work in Washington, DC. Each time I’ve admired the Lincoln Memorial and what it stands for and the Arlington House and eternal flame, and for what they signify. The view is especially poignant at night. The proposed arch drastically impacts the meaning of those two

sacred areas and should not be built in this location.

Although effort was made to depict the monument as not seen from many views in Arlington Cemetery, those pictures were taken when the leaves were on the trees. The winter months will show much more of the arch to the families visiting our sacred grounds. In addition, shadows created during the day and excess illumination at night impact the view and meaning of many areas of the cemetery. This project is not meant to provide solace to those visiting and viewing the cemetery.

Memorial Circle is a human controlled traffic circle. There is a delicate balance of pedestrians, bicyclists, and vehicles that respectfully traverse the circle every day. I find this entry especially pleasing and inviting. Despite the volume, this seamless traffic approach moves vehicles smoothly and respects the purpose of this western entrance into the city. Adding hard stop lights and increasing the pedestrian traffic will create a traffic nightmare to the residents that commute to work via this route. In order to avoid this created traffic mess and the lack of viewing directions with the massive monument taking up almost the entire circle, I will find another way into the city.

THE ARCH IS UNECCESSARY AND AT A COST THAT SHOULD BE USED FOR THE BETTERMENT OF THE GENERAL POPULATION VERSUS THE EGO OF THE ONE.

Attachment

Name: Russell Hanson
Date: October 30, 2026 1:03:11 pm

Please do NOT allow this project to proceed. This is a sacred sight with a long standing tradition allowing unobstructed views from Arlington Cemetery into the Washington Mall. It would also cause significant challenges to traffic in this area.

Finally, we do not need a monument to the most corrupt president this country has ever seen. It would be a permanent stain on our democracy.

Name: Veronica Gagnon
Date: October 30, 2026 12:55:16 pm

The new monumental arch will serve no purpose, as the reasons for it keep changing, except to hinder the view from Arlington Cemetery to Washington, DC. It will cast a huge shadow! Is that the president’s goal? To have his shadow cast over DC even after he’s gone? It is merely another vanity project to suit his needs and is something the MAJORITY of Americans don’t want and CANNOT afford.

Name: Cynthia Lehman
Date: October 30, 2026 12:33:52 pm

The planned monument is a vanity project proposed by someone who neither understands nor respects United States history. The damage that has been done to Washington, D.C. in the last 2 years has been shocking. It has to stop now. I am especially distressed by the idea that armed soldiers and drones would have a place within the arch. Truly, what is wrong with us? I don't know of any country in the world that has constructed such a structure. I will feel less safe in the city knowing that armed people are perched on high watching what is going on. Too many people in the United States have been killed by the police and ICE every year for no apparent reason. We need to maintain the beauty of Washington and stop crowding it up with one person's misguided ideas of public spaces.

Name: Kimberly Stronczek
Date: October 30, 2026 12:02:20 pm

This is a huge mistake to our veterans at Arlington Cemetery, dangerous for traffic, air and otherwise. And wasting my tax dollars on glorification project for T. We don't want, don't need more gold. We want affordable prices, we want healthcare, we want peace and unity. We want trees and green spaces.

Public Comments for New Monumental Arch

Total comments: 19

October 31, 2026

Name: Nancy Sheran
Date: October 31, 2026 10:10:15 pm

I oppose the proposed Monumental Arch towering over Arlington Cemetary, as it is currently designed. It's retro design seems anti-American and backward looking. It sends the wrong message. All designs and new construction in Washington DC should go through the normal review and approval channels. We can do better. Let's not destroy the beauty of our Capital city! Save our money for better uses!

Name: Diana Praus
Date: October 31, 2026 9:03:04 pm

The construction of the proposed 250-foot Arch would encroach on more than 40 historic properties in the memorial landscape around Arlington National Cemetery. It is also a colossal waste of taxpayer money. I do not want my tax dollars used to fund a unnecessary and enormous eyesore in the otherwise beautiful and hallowed ground of Arlington National Cemetery.

Name: Susan Sweetland
Date: October 31, 2026 8:50:18 pm

"Displaying an extraordinary abuse of power, the National Park Service deliberately ignored the law and their requirement to develop design alternatives for the Triumphal Arch before shutting down the federally mandated review process in the face of massive public opposition to a project that would destroy the sacred, symbolic visual link between the Lincoln Memorial and Arlington National Cemetery and Arlington House"

We need to honor and respect our historic sites, and this is simply a vanity project for a desperate and dangerous president.

Name: Maureen Reichl
Date: October 31, 2026 8:13:05 pm

This is not desired or necessary; it is only a vanity project for the President. We do not want our tax dollars to be spent on his ego when literally millions of people do not have adequate healthcare or food. It is disrespectful to the memory of those interred there and to their families and loved ones. Washington D.C. is being destroyed, one vanity project at a time.

Name: Kimberly Baer
Date: October 31, 2026 7:26:53 pm

I have long been a huge admirer of the beauty and meaning embedded in the city planning and architecture that makes Washington D.C. so singular. The proposed monumental arch is ill-conceived and horribly designed. It is simply a vanity project and not for the public good. It should NEVER be allowed to move forward.

Name: Nancy Davis
Date: October 31, 2026 6:46:22 pm

I do not support this project. It is unnecessary, ill-conceived, poorly designed, disrespectful to veterans and their families, and would add an ugly eyesore to a currently sacred landscape. It would negatively alter the viewscape between the Lincoln Monument and Arlington Cemetary and impact dozens of other sites. It should not be funded and I do not want my tax dollars wasted on this.

Name: Paula Antoni
Date: October 31, 2026 6:19:43 pm

No Arch
Not here
Not ever

Name: Larysa Kurylas
Date: October 31, 2026 4:48:18 pm

See attached letter.

Attachment

Name: Rebecca Procter
Date: October 31, 2026 3:56:12 pm

Arlington Cemetery is a deeply resonant, somber place of remembrance for Americans killed in war, not to mention an historic location where the leader of the Confederacy kept a home that depended on enslaved people to run it. The memories of war, loss, slavery, turning points in American history, and simply the sober beauty of open space at Arlington are too important and too precious to be denigrated and destroyed by a gaudy, outrageous vanity project. This is all in addition to the fact that placing it here is completely against the laws of this country that are in place to protect our heritage and cultures. I most STRONGLY oppose this project and request that it's construction be denied.

Name: Denise Varner
Date: October 31, 2026 3:48:19 pm

Please don't allow this abomination! It is nothing but yet another vanity project by a narcissistic president who cares only about glorifying himself.

Name: Suzette Fontanelli
Date: October 31, 2026 3:44:37 pm

NO!NO!NO! Why? We don't need to spend the money on a building that will not add any value to the citizens of this country. The cost is enough to say no and if donations are accepted then it becomes political favors for the group in charge.

We have to put an end to the endless spending on useless items and focus on what the people need.

Name: Amanda Murphy
Date: October 31, 2026 3:36:06 pm

Re: Lemmon v. Trump 1:26-cv-00544-TSC

I am a Registered Professional Archaeologist, and Certified Environmental Professional (CEP-IT), with two decades experience working on projects and conducting reviews under the NHPA and NEPA. I write in response to the Lemmon v. Trump amicus brief.

I am opposed to the construction of the arch due to apparent violations of The Commemorative Works Act, 40 U.S.C. §§ 8901–8909, and The National Historic Preservation Act, particularly Section 106 (54 U.S.C. § 306108). I raise three additional considerations concerning the proposed triumphal arch

1. National security, public safety and the proposed location

President Trump, Secretary of Defense Hegseth and EPA Administrator Zeldin have cited national security as a justification for the proposed arch, including its potential use for sniper positions, drones and munitions storage. This raises fundamental questions about the compatibility of those functions with a structure simultaneously promoted as a public monument and tourist attraction, situated in the middle of a busy public road network and an area of considerable pedestrian activity.

What safety assessments have been undertaken? What are the applicable requirements concerning explosives storage, safety distances, firing positions, ballistic danger areas and drone operations? How would these military functions be reconciled with public access, tourism, traffic circulation and emergency services? What arrangements would protect visitors and the surrounding public?

These are not peripheral planning considerations. Having conducted environmental review for military firing ranges and munitions storage, many required safety mitigations are incompatible with the proposed purpose and location of the structure. If national security is genuinely a central purpose of the structure, its operational requirements and associated risks must be fully assessed and reconciled with its proposed public function. The administration cannot invoke military and security considerations to justify the project while disregarding the implications those functions have for public safety and the surrounding environment.

2. The historical and architectural significance of a triumphal arch

A triumphal arch is a specific architectural form with a particular historical purpose: traditionally, the commemoration and celebration of military victories, national achievements and those responsible for them. What precisely is the triumph that this arch is intended to commemorate? Is it a particular military victory, the collective achievements of the American armed forces, the founding of the United States, or the endurance of American democracy?

This distinction matters enormously given the proposed location. The surrounding landscape, particularly Arlington National Cemetery, is dedicated to remembrance, sacrifice and the human cost of military service. The relationship between Arlington House, the cemetery, Memorial Avenue and the Lincoln Memorial also embodies a carefully established history of national reconciliation. The objections raised by veterans in the current litigation underline the importance of considering whether this proposed monument is appropriate to that setting.

There is a fundamental distinction between commemorating military service and celebrating military triumph. The administration should explain what historical achievement is being celebrated, whose achievements are being honoured, and how a triumphal arch complements rather than undermines the established historical and commemorative character of this nationally significant landscape.

3. The democratic and constitutional legitimacy of the proposed monument

A triumphal arch of this scale, particularly one presented as celebrating American victory, democracy and patriotism, is intended to represent something enduring about the United States and its national identity. This raises a fundamental question about whether President Trump is an appropriate person to determine and embody that national symbolism.

This is not simply a question of personal military service or qualifications. It is about the considerable contradiction between the democratic and constitutional values the monument purportedly celebrates and the President's own record and conduct.

That record includes his attempts to overturn the result of the 2020 presidential election and undermine the peaceful transfer of power; his use of military force abroad in circumstances raising serious questions about congressional authorization, including the operation to remove Venezuela's President; the lethal military operations against vessels in

the Caribbean, including allegations concerning the killing of survivors; the use of federal law enforcement against political opponents; actions raising serious questions about due process and the rights of American citizens; and assertions of executive authority that challenge Congress's constitutional power over public expenditure.

There is also the demolition of a substantial part of the White House East Wing, an enduring symbol of American national identity, to accommodate the President's own architectural ambitions, raising questions about the treatment of national heritage as though it were the personal property of the incumbent President.

The United States is a constitutional democracy, not the personal possession of its President. Its history, institutions, military achievements and national symbols belong to its people. A President's electoral mandate does not confer ownership of the nation's history or an unrestricted right to reshape its national identity in his own image.

The question is therefore not simply whether President Trump personally deserves a monument. It is whether a permanent national monument purporting to celebrate American democracy, patriotism and national achievement should be conceived and imposed through the personal preferences of an incumbent President whose conduct has itself repeatedly raised questions about respect for democratic institutions, constitutional constraints and the rule of law.

Ultimately, this proposal raises three interconnected questions: whether it is safe and appropriate to combine military functions with a public tourist attraction in this location; whether a triumphal arch is historically and architecturally appropriate to the landscape and the achievements it purports to celebrate; and whether the project genuinely represents the enduring democratic values of the United States, rather than the personal ambitions and political legacy of the President proposing it.

Name: Ken Mayer
Date: October 31, 2026 2:02:37 pm

At a time when our National Parks are sorely underfunded & visitation continues to increase, where is the money coming from for this project? More important, who has been clamoring for this arch? Shift the funds to Arches National Park or our national parks backlog of work projects desperately need to keep up with visitation. This ill-conceived monumental arch is inappropriate for it’s planned location and a waste of taxpayer money!

Name: Maryrose Wilson
Date: October 31, 2026 1:59:06 pm

Please see attached comments

Attachment

Name: Joanne Vine
Date: October 31, 2026 11:17:44 am

Commissioners:

My name is Joanne Vine. For nearly a year, I have joined Neighbors at Memorial Circle every week to oppose this arch. We have stood there in the cold, the heat, and the rain because we believe this historic place deserves protection.

Today, I am asking you a direct question - why does approval feel inevitable when the objections are so substantial? Is there any concern serious enough for you to refuse this president? His political power cannot absolve you of responsibility for the damage a yes vote would cause.

You have heard opposition from residents, veterans, preservationists, and others who care deeply about our capital. What public benefit could justify imposing this enormous structure on this particular place?

Your preliminary review requested further answers about height justification, traffic safety, visitor access, pedestrian safety, and aviation lighting. And what about the two pending lawsuits and lack of congressional approval? You owe the

public an explanation.

What evidence would convince you to vote no? Answer me that please —because after today, each of you will own your vote, and after this administration is gone, the consequences will remain. I ask you to reject final approval. Protect this Landscape, give the public a reason to believe that your judgment is independent, that there is integrity in this process, that our testimony matters, and that your duty is to the public, which includes saying no to this president. Thank you.

Name: Annette Dluger
Date: October 31, 2026 11:09:50 am

I feel the arch is a huge waste of money, disrespectful to Arlington National Cemetery, and a danger to planes flying into and out of Reagan airport. Please do not approve it.

Name: Jodi Guckenberg
Date: October 31, 2026 10:42:27 am

No to the arch!
Not here
Not ever
Our park areas are for the people. Spend money where it is needed (infrastructure, safety, protection of nature, staffing) not on vanity projects.

Name: Wanda Nelson
Date: October 31, 2026 8:14:51 am

I oppose trumps arch!

Name: Ann Brown
Date: October 31, 2026 1:01:26 am

I strongly oppose the construction of a Triumphal Arch in Memorial Circle outside of Arlington Cemetery. Several of my family members and friends are buried or interred at Arlington Cemetery. The current view of Arlington Cemetery is restful and serene when viewed from both sides of the river. The proposed arch would detract from that reverence. Visitors to the Arch's planned observation deck would intrude on personal burial services in the cemetery; lighting would bathe the cemetery in light at night – a space that is currently intentionally dark out of respect for those who are buried there.

According to the Park Service's own study, the Arch will negatively impact several other Washington D.C. monuments including the Lincoln Memorial. The scale is grossly inappropriate to the surroundings; the planned 250 foot (25 story) Arch is outsized and would dwarf other landmarks. It would block the view of Arlington Cemetery from the D.C. side of the Potomac River and it would interrupt the historically significant corridor from the Lincoln Memorial to the Custis Mansion symbolizing the reunification of the North and South following the Civil War.

I also object to the use of Public Lands for the President's personal vanity project, especially when it appears that the majority of the public opposes the construction of the Arch. This includes lawsuits filed by Veteran's groups and Arlington County.

The President suggests that this Arch would have some military or national security function – inappropriate for a monument visited by the public, inappropriate for placement outside a memorial for our war dead, and unsafe in an already overcrowded air space.

Finally, I take issue with the use of public funds to build a monument that is unwanted and unneeded when there are

many greater needs in our country including healthcare, housing, and food. Congress, not the President, should decide how tax dollars are appropriated.

Public Comments for New Monumental Arch

Total comments: 26

November 1, 2026

Name: Sarah Bell
Date: November 1, 2026 9:30:39 pm

Do not build an arch in DC! It is a waste of taxpayer money and will infringe upon the Arlington National Cemetery. Our veterans deserve our respect. In addition, the Trump administration continues to ignore laws and must be stopped.

Name: PAUL CRUMRINE
Date: November 1, 2026 7:28:47 pm

Attachment

Name: Leah Carrubba
Date: November 1, 2026 7:26:55 pm

I oppose the building of this arch -

Approving architecture in Washington DC without congressional oversight is irresponsible.
Changing the view of Arlington national Cemetery is disrespectful to all of the fallen heroes
This arch will place a literally and figurative shadow over the cemetery and other monuments.

I grew up 40 minutes outside of Washington DC and spent years visiting the monuments and the museums as a child and young adult. This arch is an unnecessary waste of money and goes against the architectural plans for no apparent reason.

Thank you for your attention to this matter.

Leah Carrubba

Name: Joyce Levine
Date: November 1, 2026 7:23:43 pm

Thank you for the opportunity to speak on this matter.

This monument to one man's ego is purely a vanity project. It's out of place and out of scale with its surroundings. America does not build "trumphful" arches - we are far more modest and idealistic than that. Everywhere, our memorials and historical markers are built at human, not "monumental" scale.

This travesty should hold a special place in only one location: the dustbin of history.

Which, by the way, will not view you kindly if you cave to a con man, felon, and insatiable narcissist. If erected, the arch will only suck up taxpayer dollars going up - and, very soon, coming down.

Thank you again. Now do your duty - to all Americans, instead of just one - and vote this abomination down.

Name: Sara Rochon
Date: November 1, 2026 7:16:49 pm

Please, please do not allow this monument to Donald Trump be built. This is just another project to pay homage to him. It will detract from Arlington Cemetery and show disrespect to our veterans who are buried there. And what is the purpose of the Arch? National Security? Those are two magic words for Donald Trump. He figures all he has to do is utter those words and everyone will kowtow to his wishes, which is what has been happening. Please set a precedent and tell him "No". Maybe others may get the spine to follow your lead. Thank you.

Name: Greta Gribkoff
Date: November 1, 2026 6:30:13 pm

I am commenting in strong opposition of the proposed New Monumental Arch for the following reasons:

• The massive arch will obstruct iconic historic sightlines between the Lincoln Memorial and Arlington National Cemetary/Arlington House.
• Congress holds the constitutional power to initiate projects on federal land in DC and has not approved this project. Thus it is unlawful.
Lastly, but most importantly in my view, the arch is a vanity project for the President rather than a genuine tribute and disrupts the solemn atmosphere of family burials and memorials at Arlington National Cemetery.

Name: Sabrina Commisso
Date: November 1, 2026 6:29:20 pm

This arch will destroy a sacred landscape that the US has created over the years to honor presidents that have passed away.
Why is there a proposal to build a monument for a narcissistic sitting president?

Name: Anthony Lucente
Date: November 1, 2026 6:24:40 pm

This project is abomination and disrespectful to the memories of our veterans not to mention President Abraham Lincoln. Vote NO on this 0poorly designed and misplaced "monument". It serves one not many.

Name: R. S. Tracy
Date: November 1, 2026 5:49:02 pm

I object to this arch in every possible way. This obscenity of a structure is a waste of tax payer dollars, it is unwanted by the American people, and violates the law.

We all know that no living president has EVER built a monument commemorating his own greatness. Only DJT has the audacity to do such a thing. Donald Trump will go down as the worst "president" in U.S. history. He has failed at everything.

A history of bankrupting everything he touches, he is deliberately weakening our economy and bankrupting our democracy, turning himself into international joke, and by extension the United states. He has made our country weaker and more vulnerable than at any point in its history. DJT humiliates himself multiple times per day and, in doing so humiliates We the People and our country.

No political figure in the history of our country is less deserving of the honors DJT is attempting to give himself. What he is deserving of is an orange jumpsuit and a small padded room. A towering monstrosity of an arch honoring his despised name? Absolutely not!

The sheer magnitude of this arch, if built, would dominate the Memorial Circle area of Washington, D.C. in which it is to be erected. The arch would dwarf the Lincoln Memorial, built to honor one of our country's greatest presidents. It would

obstruct and overshadow the Arlington National Cemetery, the resting place of those who gave their last full measure of devotion in service to our country. No place in our nation is more sacred than these hallowed grounds.

If built, this arch would stand more than 250 feet tall, about the height of a 25 story skyscraper. The structure would be in violation of the Commemorative Works Act, which states that buildings or structures built on federal land must be approved by Congress. It violates the Height of Buildings Act, which usually does not allow buildings over 160 feet tall. Further, the design of this "monumental" arch looks like something out of the Nazi design book. Not only is this structure rejected 2 to 1 by the American people, it is blatantly illegal.

At a time when American's are struggling to pay for food, healthcare, gas, mortgages/rent, and an unwanted and illegal war, our government wants to spend an estimated $400M of our taxpayer dollars on an unwanted and unnecessary vanity project designed to pander to a man with a 64% disapproval rating? This monumental arch only confirms Donald Trump's May 12, 2026, statement that he does not consider the American people.

This arch is a slap in the face of every single decent hardworking American, and I sincerely hope the members of the Advisory Council on Historic Preservation will have the courage to stand with the American people and reject this monstrous structure which is a testament to poor taste and unmerited self-aggrandizement.

Name: Gwen Dixon
Date: November 1, 2026 5:48:39 pm

Please do not destroy our beautiful landscape with this tacky arch. Further more the entire country needs to give permission to deface OUR landscape. This is a smack in the face to all citizens of America!

Name: Norm Lisy
Date: November 1, 2026 5:08:04 pm

Congress built this ground. Let Congress decide what stands on it. I oppose the arch. My ask has nothing to do with party. Decide on the record whether the Height of Buildings Act binds this project. You have always said it does. Decline final approval until Congress acts.. My ask has nothing to do with party. Decide on the record whether the Height of Buildings Act binds this project. You have always said it does. Decline final approval until Congress acts.

Attachment

Name: Suzanne Ganschinietz
Date: November 1, 2026 4:17:00 pm

I am writing to oppose the Trump Monumental Arch which will destroy the axial relationship of Washington Monument with the approach to the Arlington Memorial Cemetery.Throughout the history of DC planning there has been a respect to the tenets of the McMillan Plan, the design context, and the relationship of the monuments. The monumental size of this arch will disrupt these carefully planned relationships. I am a retired architectural historian with many years in the DC Historic Preservation Office, and I strongly protest this disruption to the balance and beauty of the Nation’s Capital.

Name: Keith Heinrich
Date: November 1, 2026 2:33:45 pm

I harbor no illusion that this meeting is anything but a formality to rubber stamp the President's desire for a massive, tacky gold-plated monstrosity to befoul our Nation's Capitol. I respectfully request, however, that before approving this tacky, gold-plated monstrosity, you spare a moment to think of the thousands of soldiers' families who will have to attend the solemn funerals for their family members all while this monstrosity looms over them in their time of sorrow. Consider

reducing the height or changing the location so that the families of these heroes can experience these solemn burial rites without this monstrosity looming over them.

Name: Rachel Wittel
Date: November 1, 2026 1:40:31 pm

The proposed Triumphal Arch at Memorial Circle would destroy one of America's most symbolic landscapes. It would disrupt over 30 funeral services daily at Arlington Cemetery, where our veterans deserve respect and peace. Not to mention its size, location, cost, and impacts… the people do not want this. I reject this forced project on taxpayers.

Name: Gary Langston
Date: November 1, 2026 12:32:47 pm

November 1, 2026

Ref: NCPC Project ID 8778, New Monumental Arch

This is a text only version of my comments. Please see attachment for a version with graphics. My oral testimony will be submitted separately.

For context, I write as a Retired Army Officer and a Washingtonian for now 30+ years. My parents were a Vietnam Veteran and his “Army Wife”, a Nurse. My wife served for 9 years and is a Combat Veteran of Operation Desert Storm. My father was drafted, served two tours in Vietnam flying and leading helicopter units in combat, returning to the Pentagon in 1969 where he was not permitted to wear his uniform to work due to the hostility that the American public held against those who were serving. He later served as a District Recruiting Commander as the all-volunteer service was created. My mother and father were interred in Section 66 of Arlington National Cemetery in 2012 and 2014, respectively. They would be horrified by chosen site, design, and undemocratic decision process currently being followed, particularly for a commemorative work intended to celebrate the Republic.

I salute the State Historic Preservation Officers and their Staffs for speaking truth to power regarding this undertaking. Mitigating the impact from this site is not achievable. The “Finding of No Significant Impact” is insulting, as is the abrupt termination of the Section 106 review.

These impacts are emotional, not just physical – I encourage all of you now considering this undertaking to take a walk with a Veteran to the impacted sections of Arlington National Cemetery, whether registered landmarks, or final resting places.

Major Comments:

1. Funerals and Gravesite Visits viewable by Tourists from the Observation Deck. While the (now terminated) Section 106 review clearly demonstrated that the Purpose and Need for the Triumphal Arch/New Monumental Arch is not satisfied by the undertaking, and should not be built on Memorial Circle, it UNDERSTATES its negative impacts, particularly as it relates to honoring our fallen at Arlington National Cemetery, including Presidents Kennedy (year round) and Taft (in Winter), and General Colin Powell in Section 60 (at least in winter), to name just three heroes. I can only conclude that the statement that alternative sites would be an entirely different undertaking, and therefore were not considered, are due to the relationship of Memorial Circle to the Memorials for President’s Lincoln and Kennedy, as well as the Custis-Lee family. In other words, this is an intentional modification at the request of a living President, with no desire for historic preservation to educate and unify the country.

Some specifics:

• The Assessment of Effects (AoE) only considers existing, registered, landmarks and places. Therefore, many additional impacts are unreported. For example, while the AoE claims that Section 60 of Arlington Cemetery is not impacted, the current design of the Global War on Terrorism Memorial planned for the National Mall highlights its sightlines to Section 60. Both statements cannot be true. The Viewshed Analysis provided to the Consulting Parties, but not the public, demonstrates that indeed Section 60 is predicted to be within the Viewshed, especially in winter when the leaves are off. Figures 1 and 2 in the appendix attached to this letter include graphics that illustrate this issue more clearly.

• Sections 57, 75, 76 and the Niche Wall are close to the Arch. These sections, established within the past 20 years, are all approximately one half mile from Memorial Circle, and quite often are the site of funerals for Vietnam Era Veterans who were drafted. The impact of the Arch on Arlington National Cemetery is most extreme here and will be more so during "leaf off" conditions not currently depicted in any of the provided renderings (note: I appreciate the updated renderings provided in the most recent project materials – but "leaf off" renderings are needed as well). The appendix includes a graphic to depict the proximity. Now imagine a former draftee on an "Honor Flight" visiting the Mall, the Wall, and the Cemetery, an experience that shifts from solemnity to triumph to solemnity and then to a view of a monument to a living President who did not serve, nor has his family, in contrast to that of Lincoln and Kennedy. See figures 2 and 3 in the Appendix.

• Another Eternal Flame? The new "Eternal Flame" atop the Arch to be installed as a replacement for aircraft warning lights, is an insult to the current Eternal Flame at the Kennedy Gravesite (by copying this honor for a living President). It is also certain to overwhelm the view of the existing Eternal Flame at night due to the intensity of the lighting necessary to satisfy flight safety requirements. This is in addition to the harm from the physical structure of the Arch blocking these beloved historical views from Memorial Bridge and various points along the Potomac riverbank including the Lincoln Memorial and the Watergate Steps. Coupled with the current threat to demolish the Kennedy Center, I can only conclude that the undertaking is an attempt to create a false sense of equivalency between two beloved, assassinated, Presidents, and our currently serving President. See Figure 4 in the Appendix.

2. A Lost Opportunity to Extend the "Monumental Core" and Plan for Future Memorials and Monuments. As noted in several current laws, the National Mall is already full and essentially complete. As the Chair of the Commission on Fine Arts stated during its reviews, there is a need to extend the Monumental Core. By not considering alternative locations (including two suggested by the CFA chair himself), the project is missing out on what could have been a very significant achievement – extending the core and making room for future commemorative works that honor and document our future history. Curiously, while the CFA Chair stated in public that he recommended (as a private citizen) a much smaller Arch be placed at Memorial Circle 26 years ago, that recommendation was rejected at the time. Subsequent to this, the NCPC published its Museums and Memorials Master plan, specifically ruling out Memorial Circle as a viable site. Figure 5, in the appendix to this letter includes a copy of the pertinent section of the plan. Thus, a truly strategic planning opportunity is being squandered, in favor of speed/expediency. I challenge anyone to stand with me at L'Enfant's grave, look over the current city and his vision, consider that the Arch at 250' will tower over L'Enfant's grave at 117' elevation above Sea Level, and still proclaim this is the best site to accommodate the needs of our National Mall for the next 250 years.

3. A lost opportunity to support, not detract from, Arlington National Cemetery. It wasn't that many years ago that Arlington Cemetery was suffering from both mismanagement and a lack of capacity. Thankfully, large investments were made to both Restore Honor and acquire more land. We need to build upon that support and continue to address the space/capacity issue that will return in the 2050-2060 timeframe, while first "doing no harm."

4. The time is now to plan for monuments to the Constitution and the Bill of Rights. Yes, it takes years to approve and implement Commemorative Works for the National Mall. The Global War on Terrorism Memorial is working toward a 2028 completion. Area I is precious, hallowed ground in extremely short supply. Following the law is a required component of supporting and defending the Constitution, and never more important than when planning projects here intended to last hundreds of years, in such a confined space.

Finally, I want to recognize the fine work being done by the Historic Preservation community under extreme pressure, especially the State Historic Preservation Offices of DC and Virginia. Also, I know that many Commissioners, Staff, and NPS personnel working on this project are Veterans themselves, or have family interred at Arlington, or both. We may disagree – that is everyone's right; hence the need to follow the Constitution and our laws to resolve our differences. Especially right now.

The included appendix includes Figures to better illustrate my comments.

With Respect,

/s/
Gary E. Langston, Jr.
Colonel, US Army (Retired)
Washington, DC

List of Figures (provided in the version attached):

1. Relationship of future GWOT Memorial to Section 60, Arlington National Cemetery
2. Viewshed Analysis Map
3. Current View from Sections 57, 75
4. Extract from NCPC Museums and Memorials Master Plan
5. Historic and Current Views of Kennedy Gravesite Eternal Flame

Attachment

Name: Mary Belcher
Date: November 1, 2026 12:03:33 pm

The symbolic visual connection between Arlington Mansion and Washington's National Mall would be broken forever by the construction of the proposed arch at Memorial Circle.
In 1861, President Lincoln and citizens loyal to the Union took over Arlington Mansion to refute the claims of southern White privilege embodied by Robert E. Lee's house on the hill. During the Civil War, the mansion and its grounds became an Army base, military cemetery, and a village for African American refugees of the war.
In the expanse between Arlington Mansion and the U.S. Capitol, thousands of stories that comprise the American story are told: in the graves, the monuments, the restful green spaces, and the shimmering pools.
The members of the National Capital Planning Commission should ask two questions. What would the proposed arch add to the story of our city and country? How would its construction detract from the story that is told in one breathtaking view from the porch of Arlington Mansion to the statue of Freedom atop the U.S. Capitol?
There might be a place in someone's fantasies for a proposed arch of grandiose proportions and gilded statuary. But it has no historical significance. It symbolizes nothing. It carries no meaning in the physical world. It is pointless.

Name: Douglas Roberts
Date: November 1, 2026 11:42:07 am

I am 100% opposed to the "Triumphal Arch" that President Trump wants built near Arlington cemetery.

First, there is no popular support for this. Basically only Pres. Trump wants this and the people he appointed to the board(s).

There is no reason to build this arch to celebrate 250 years of the country.

We cannot afford to build this arch. (If Trump wants it, he should pay for it himself.)

The height of this arch is very much to high for where it is and where it is to be is a bad place for it to be built.

Name: Nina Severini
Date: November 1, 2026 11:19:43 am

I believe Congress should be involved in this project that would dramatically change one of America's most symbolic landscapes so the voices of the people can be heard. Arlington Cemetery is a sacred space and the input of veterans should be included before any structure is built to block that. This is just ONE of the reasons this project needs to be reconsidered or completely abandoned.

Name: Stephen Hirst
Date: November 1, 2026 11:10:46 am

The proposed triumphal arch on Memorial Circle violates the thoughtful planning of the national capital. The sightline between the Lincoln Memorial and Arlington House, built by Martha Washington's descendant and lived in by Robert E. Lee. That sightline falls across Arlington Cemetery and underlines the war and loss that almost undid the nation. That sightline was and remains intentional. A triumphal arch does not belong in this sightline. The planners of the city intended solemnity here, and a triumphal arch would violate and interrupt it.

Further, the arch is so oversized that it threatens the airspace approach to National Airport, one of the busiest and most challenging airports in the nation. If the arch incorporates drone launching as the president states, then it would become a completely unacceptable risk to set in a busy civilian airspace. The arch's height violates the city's building codes as well, and it is surpassingly garish—completely out of keeping with the stately design of the city.

If such an arch must be erected, Memorial Circle is completely the wrong place for it. It would offer both danger and visual blight in that location.

Name: Karen Koltes
Date: November 1, 2026 10:29:47 am

Please see attached.

Attachment

Name: Amy Johnson
Date: November 1, 2026 8:57:04 am

I am against construction of the proposed monumental arch. Its location degrades the area around it, including the view from Arlington National Cemetery. I am against taxpayer fund use for this project.

Name: Jonathan Hirsch
Date: November 1, 2026 8:41:19 am

Attachment

Name: Lila Suna
Date: November 1, 2026 7:38:10 am

Dear Commissioners,
The proposal as now conceived is quite simply a large eyesore. Rather than enhance the view it ruins the line of clear vision between all the existing monuments.

Our 'gateway' stands open via the beautiful bridge and that in itself is the invitation to our beautiful city. The arch shouts a hubris that is ugly and unworthy of the nation's capitol.

Lila Suna
Washington, DC

Name: Laura Fedak
Date: November 1, 2026 7:30:32 am

To Whom It May Concern,

The Monumental Arch would create an adverse effect to the existing historic structures and monuments on the National Mall. The Nations mall is protected by Section 106 of the National Historic Preservation Act.

I’m asking as a citizen of the United States that the National Mall be kept in its current state in order to preserve the historic structures and monuments that already exist.

We the people of the Nation should respect the integrity that already exists and honors the sacrifice of our Nations hero’s by not building the Monumental Arch.

Thank you,
Laura Fedak

Name: Angie Kreyenbuhl
Date: November 1, 2026 5:46:36 am

NO to the Arch. Not here. Not ever.

Name: Christine Holmes
Date: November 1, 2026 4:53:29 am

I am a registered voter and would like to express my strong negative feelings about the proposed arch. It is not legal, is ostentatious and a pure vanity project, but worse than that it interferes with the solemnity and peace of Arlington National Cemetery. NPCA and other advocacy, conservation and historic preservation organizations filed an amicus brief this week in support of Public Citizen’s motion for the district court to HALT the unlawful construction of the Triumphal Arch. I agree and say a hearty NO to the arch.

Public Comments for New Monumental Arch

Total comments: 22

November 2, 2026

Name: Kelly McLear
Date: November 2, 2026 11:58:02 pm

I strongly oppose the proposal to build an architectural in D.C. This makes no sense in relation to the history of our nation's capital , is very unattractive by scale and design, and most importantly, it is a huge waste of taxpayer dollars. The citizens of America have far more important concerns and desires right now than expenditures on a vanity project.

Name: Ron Geida
Date: November 2, 2026 11:07:11 pm

This project sidesteps laws and violates the sanctity of a national park area devoted to conservation and preservation of service members' resting places. It is unlawfully being fast tracked to suit the president's whims for another personal vanity display. I see no need for this project to commence; certainly not without congressional review.

Name: Edward Stierli
Date: November 2, 2026 11:05:32 pm

I am already registered to speak. Attached are comments on behalf of the National Parks Conservation Association.

Attachment

Name: Wendy Shipley
Date: November 2, 2026 8:29:55 pm

Our history is being destroyed by gilded garbage. No arch. Not ever. Not blocking the path to Arlington.

Please listen to the people. This is our National Gateway to our capital city and it’s being cheapened by trump’s idiocy

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Name: Lydia Soo
Date: November 2, 2026 7:34:33 pm

I am against the proposed monumental arch at Memorial Circle in DC.

I am an architectural historian and retired university professor. I sent comments earlier to you, the National Capital Planning Commission, as well as the National Park Service, and Office of Federal Agency Programs. I recently learned from the National Trust for Historic Preservation of this opportunity to once again submit comments to you.

Since first sending you comments, many more reasons have emerged to oppose this project. The latest is how the arch will cast a huge shadow obscuring views to the memorials honoring Vietnam and Korean War veterans as well as Abraham Lincoln and ML King. There continues to be the hare-brained idea of turning the arch into a crowded tourist destination plus military installation--the perfect target for bad actors wanting to make a big statement.

And then there is the appalling design of the arch itself. It is ridiculously oversized, tasteless by classical standards, ugly by modern standards, and a waste of money. The renderings of the arch in its surroundings provided by National Park Service show that it will be a horrifying and grotesque defacement of DC’s elegant historic landscape, so carefully nurtured for centuries. The arch destroys the beauty and poetry of its setting, in particular the views to Arlington National

Cemetery and the Lincoln Memorial. I am not a member of the military nor have any relatives therein but as an American I am deeply offended by this affront to their sacrifice.

Finally, there is the unavoidable and highly inappropriate association of the arch's design with authoritarianism. This symbolic meaning results from the use of colossal triumphal arch type throughout history by ancient Roman emperors, absolutist monarchs, and Fascist dictators to celebrate themselves. Examples include the Arch of Emperor Septimius Severus (Rome), the Arch of Emperor Constantine (Rome), the Arc de Triomphe of Emperor Napoleon Bonaparte (Paris), and the Victory Monument of Benito Mussolini (Bolzano, Italy).

Given its inherent symbolism, the proposed triumphal arch in DC is a perfect expression of the authoritarian aspirations of one man. But these are not and have never been those of the American people. We are and have always been a democracy, not an autocracy. This arch should not be built.

Name: Stephen Mueller
Date: November 2, 2026 7:23:28 pm

Even though the name has been changed from Triumphal to Monumental, I continue to vehemently oppose the construction of any arch in Memorial Circle. As a citizen, a veteran, and someone with family members buried in Arlington National Cemetery, you need to listen to my voice.

And yet you continue to ignore my voice as well as the innumerable others that are in opposition to this project. In the Public Comment section of the Executive Director's Recommendation report for this meeting, it is even acknowledged that "The vast majority of the comments received are in opposition to the project …", but you continue down the path of approving this project. What is not mentioned in the report is the universal rejection of this project by the people that should have the greatest voice; those of us with family members in the cemetery. I do not understand how in good conscience you can so easily dismiss the concerns of those most affected.

I would be more upset by your predetermined intent to approve this project if I did not have confidence that the federal courts will see through your subversion of the approval process, including the ludicrous claim that the arch already has congressional approval under legislation passed in 1925, and find your actions illegal. And if this does come before the US Congress, where it should have started in the first place, I have every confidence that our elected representatives, unlike the administration's appointees on this commission, will listen to the voice of the people and halt this project. Of course, you could save us all a lot of heartache and just reject this project here and now.

Name: Michelle Pezley
Date: November 2, 2026 7:07:25 pm

I concur with the National Trust of Historical Preservation findings and statements that the arch does not meet the Secretary of Interior Standards of historical preservation. I ask that you stop moving the Arch forward.

Michelle Pezley
Iowa

Name: Gianna Kersch
Date: November 2, 2026 6:05:05 pm

November 2, 2026

Chair and Members of the Commission
National Capital Planning Commission
Washington, DC

RE: Formal Opposition to the Proposed Monumental (Triumphal) Arch at Memorial Circle — Request to Reject Final Site and Building Plans

NCPC File No. 8778 | NPS Project No. 136973 | ACHP Case No. 025123

Dear Chair and Members of the Commission:

I am writing as a historic preservation professional working in cultural resource management, historic preservation, and preservation planning to express my unequivocal opposition to the proposed Monumental Arch at Memorial Circle and to urge the National Capital Planning Commission (NCPC) to reject the final site and building plans.

Having reviewed the project's architectural proposals, assessment of effects, environmental documentation, consultation history, and agency findings, I find this undertaking profoundly troubling—not only for the extraordinary and permanent damage it would inflict upon one of the nation's most significant historic commemorative landscapes, but for what its advancement reveals about the federal government's willingness to disregard the principles of responsible preservation planning and meaningful public accountability.

The proposed Monumental Arch is not an enhancement to the nation's capital. It is an unnecessary, intrusive, and fundamentally inappropriate architectural spectacle that would compromise the historic integrity of resources the federal government is entrusted to protect.

More disturbing still, the project's own documentation acknowledges extensive adverse effects on nationally significant historic properties, including National Historic Landmarks. Yet the National Park Service (NPS) has continued to advance the undertaking while treating its location, height, massing, and essential design as effectively beyond reconsideration.

This is not an example of preservation concerns being overlooked because their significance was unknown. The significance of these historic resources has been documented. The adverse effects have been acknowledged. Consulting parties have raised substantive objections and proposed less harmful alternatives. Thousands upon thousands of Americans have expressed their opposition.

Nevertheless, the project continues toward approval.

The fundamental failure of this undertaking is not that the federal government failed to recognize the historic resources it proposes to harm. It recognized them, acknowledged the damage, heard the objections, and has chosen to advance the project anyway.

I. Memorial Circle Is an Integral Part of a Historic Commemorative Landscape, Not Vacant Land Awaiting Monumental Development

Memorial Circle is an essential component of the historic ceremonial landscape connecting the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House.

This landscape embodies an extraordinary convergence of American history, commemorative planning, architectural design, and national memory. Its significance derives not simply from the individual monuments and structures within it, but from their intentional physical, visual, spatial, and symbolic relationships.

Arlington Memorial Bridge and its ceremonial approaches were conceived in the context of national reconciliation following the Civil War. The low profile of the bridge, the carefully organized approaches, and the open vistas between the Lincoln Memorial and Arlington were integral to the composition and its symbolic meaning.

These relationships are character-defining features of the historic landscape. They cannot be reduced to convenient sightlines that may be framed, interrupted, or reconfigured without consequence.

Indeed, NCPC's own November 2026 Executive Director's Recommendation acknowledges that the proposed Arch would preserve certain framed views from lower elevations while **fully obstructing reciprocal views from the higher elevations of Arlington House and the Lincoln Memorial terrace**.

This is an extraordinary admission.

The applicant's argument that the Arch would frame important views through its central opening does not meaningfully address the wholesale transformation of the historic visual experience from other significant vantage points.

A view through a massive new structure is not equivalent to the uninterrupted designed vista that preceded it. Nor can the

introduction of a new observation deck, however expansive its views, compensate for the destruction of historic spatial and visual relationships elsewhere.

The historic landscape is not simply a collection of monuments connected by convenient transportation corridors. The landscape itself is a historic resource.

Open space is not empty space. The absence of a massive structure does not constitute a deficiency in historic design. And the federal government's responsibility to preserve a historic landscape does not diminish simply because someone has conceived an opportunity to occupy it with something larger.

The proposed Arch would fundamentally alter the hierarchy, scale, setting, feeling, and commemorative relationships that define this landscape. Its construction would impose a new and visually dominant focal point upon an established composition that already possesses exceptional national significance.

That is not an act of preservation. It is an act of profound disregard for historic context.

II. The Federal Government Has Acknowledged the Adverse Effects but Has Failed to Demonstrate Adequate Avoidance and Minimization

The Section 106 record is particularly damning.

According to the Advisory Council on Historic Preservation's (ACHP) October 9, 2026, final comments, the NPS identified adverse effects involving six National Historic Landmarks, eight historic districts, eight cultural landscapes, and 20 individually significant or other historic properties.

These are not obscure or marginal resources. They include some of the most nationally significant historic places in the United States.

The magnitude of these acknowledged adverse effects should have prompted an exceptionally rigorous consideration of avoidance and minimization measures. Instead, the consultation record documents a fundamental disagreement over NPS's unwillingness to consider meaningful changes to the undertaking's location, height, scale, massing, and design.

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. Its implementing regulations establish a process for considering ways to avoid, minimize, or mitigate adverse effects.

Section 110(f) establishes an additional responsibility for undertakings that may directly and adversely affect National Historic Landmarks, requiring agencies, to the maximum extent possible, to undertake planning and actions necessary to minimize harm.

These requirements do not prohibit every project that adversely affects historic properties. They do, however, demand something considerably more substantive than the identification of harm followed by an explanation of why the preferred design should remain unchanged.

Yet this appears to be precisely the approach taken here.

The NPS has maintained that relocation or fundamental alterations to the proposal would compromise the project's purpose. But preserving a preferred design is not the same as demonstrating that reasonable opportunities to minimize harm have been exhausted.

Nor is mitigation interchangeable with avoidance or minimization.

Archaeological documentation, interpretive exhibits, educational materials, and commemorative signage may provide legitimate public benefits. They cannot restore a historic view that has been permanently obstructed, recover the integrity of a transformed commemorative landscape, or reverse the introduction of an overwhelmingly dominant structure into a historically restrained setting.

The agency has acknowledged the harm, documented the harm, and proposed measures to interpret or compensate for the harm. What it has conspicuously failed to demonstrate is why the harm must occur at all.

It is difficult to imagine a more consequential test of the federal government's commitment to its own historic preservation responsibilities.

If a project affecting this concentration of nationally significant historic resources does not warrant genuine flexibility in location, scale, and design, it is reasonable to ask what circumstances ever would.

III. The Alternatives Analysis Appears Designed to Justify a Predetermined Outcome

One of the most troubling aspects of the record is the manner in which the project's stated purpose and need have been used to narrow the consideration of alternatives.

The stated objective of celebrating the 250th anniversary of American independence is entirely legitimate. The nation can and should commemorate its history, achievements, founding ideals, and continuing aspirations.

But nothing inherent in that objective requires a 250-foot triumphal arch at Memorial Circle.

The selection of this particular form, scale, and location represents a series of discretionary design and planning decisions. Those decisions should be subject to critical evaluation, not transformed into immutable requirements that effectively disqualify alternatives from consideration.

Yet the project documentation repeatedly characterizes alternative locations and substantially different designs as inconsistent with the undertaking's fundamental purpose.

This reasoning is deeply circular.

When the proposed location, height, scale, and architectural form are treated as essential to the project's purpose, the alternatives analysis ceases to meaningfully test those decisions. It becomes an elaborate justification for a conclusion already reached.

The record includes proposals for alternative locations, reduced massing, different commemorative concepts, and modifications that could substantially reduce adverse effects.

The District of Columbia State Historic Preservation Office, for example, proposed consideration of a location near South Capitol Street and the Anacostia riverfront. Other consulting parties suggested design changes and alternatives rooted in the historic planning record.

These proposals deserved careful substantive consideration.

An agency's responsibility to consider alternatives cannot be adequately discharged by defining the preferred project so narrowly that reasonable departures from it become unacceptable by definition.

The project should be shaped by an understanding of its historic setting—not the other way around.

IV. An Unbuilt Historic Design Is Not a Mandate to Construct an Incompatible Contemporary Monument

The applicant's reliance on the 1924 Arlington Memorial Bridge Commission proposals is especially unconvincing as a historic preservation justification.

Earlier planning concepts contemplated two separate monumental columns flanking the ceremonial axis at Columbia Island. Those columns were not constructed, and the design for Memorial Circle evolved substantially before the historic landscape took its realized form.

The current proposal is not a faithful execution of those earlier concepts. It is a fundamentally different architectural intervention, both physically and symbolically.

Where the earlier columns would have framed the ceremonial axis, the proposed Arch would impose an enormous occupied structure directly across it.

The distinction is not trivial.

The existence of an unbuilt architectural concept does not establish that the present historic landscape is incomplete. Nor does it confer an enduring obligation upon future generations to construct a substantially different monument based upon a selectively interpreted historical precedent.

Historic landscapes evolve through decisions about what to build, what to modify, and what to leave unbuilt. Those decisions are themselves part of the historical record.

The existing Memorial Circle and its relationships to adjacent historic resources represent the realized outcome of that evolution.

Historic preservation is concerned with the significance and integrity of the historic resources that actually exist—not with retroactively constructing abandoned design proposals to rationalize contemporary architectural ambitions.

The suggestion that this massive new arch somehow completes the historic composition mistakes an unexecuted proposal for an enduring preservation mandate.

It is an especially poor basis upon which to justify permanent adverse effects to resources of exceptional national importance.

V. The Proposal Is Fundamentally Incompatible with the Solemn Character of Arlington National Cemetery

Perhaps the most offensive consequence of this undertaking is its impact upon Arlington National Cemetery.

Arlington is not simply another landmark within the monumental core. It is a living national cemetery, a place of mourning, remembrance, military sacrifice, and profound personal significance to veterans, service members, and their families.

Its historic character is inseparable from the dignity of its landscape, the solemnity of its ceremonial approaches, and the visual and symbolic relationships that connect it to the nation's capital.

The proposed Arch would introduce an extraordinary architectural spectacle into this setting, fundamentally changing the experience of approaching and viewing the cemetery.

Its elevated observation deck raises equally troubling questions regarding the privacy and dignity of funerals and burial ceremonies. The prospect of creating a tourist destination from which visitors may overlook cemetery activities is difficult to reconcile with the respect owed to those interred there and to their surviving families.

Construction impacts are also substantial.

The project anticipates years of intensive construction activity near a functioning national cemetery where military funerals occur daily. Although the revised environmental documentation identifies noise-control measures and coordination commitments, the adequacy of those measures must be judged against the actual experience of funeral services, not merely generalized predictions about ambient noise.

The fact that traffic and aircraft already contribute to the area's soundscape does not establish that additional prolonged construction disturbance is inconsequential.

Likewise, the addition of a brilliantly illuminated monumental structure, ornamental statuary, and a continuously burning flame would permanently transform the nighttime setting of the commemorative corridor.

A new attraction of this magnitude is not inherently compatible with a place devoted to solemn remembrance simply because its proponents describe it as patriotic.

There is something profoundly misguided about proposing to honor American sacrifice through a structure that would diminish the very historic landscape in which that sacrifice is commemorated.

Arlington National Cemetery does not require an architectural spectacle to confer dignity upon those buried there.

It already possesses that dignity. Our obligation is to respect it.

VI. A Compressed Consultation Process Cannot Substitute for Meaningful Public Accountability

The procedural history of this undertaking is nearly as disturbing as the proposal itself.

Section 106 consultation was initiated in June 2026. Over the following months, preservation professionals, State Historic Preservation Offices, consulting parties, and members of the public raised substantial concerns about the project's historic-property identification, assessment of effects, alternatives analysis, and proposed mitigation.

The NPS received 100,936 comments during its initial June comment period and another 6,254 during the July comment period.

The National Trust for Historic Preservation and other consulting parties repeatedly identified unresolved deficiencies and challenged the exceptionally compressed opportunities provided for reviewing complex consultation documents.

On September 24, 2026, the ACHP terminated consultation under 36 CFR § 800.7. Although the regulations provide a mechanism for termination when agreement cannot be reached, termination does not mean that the concerns raised by consulting parties have been substantively resolved.

The ACHP subsequently transmitted final comments to the Secretary of the Interior, and the Department acknowledged those comments on October 9.

The process may have reached its regulatory conclusion. That does not make the underlying preservation controversies disappear.

Indeed, the November NCPC staff report records continued strong opposition from the DC State Historic Preservation Office and acknowledges that the majority of comments received by the Commission opposed the project.

A consultation process does not become meaningful merely because the public was permitted to submit comments. Public accountability requires decision-makers to engage seriously with substantive objections and demonstrate how those objections informed their decisions.

The most troubling feature of this process is the apparent unwillingness to reconsider the fundamental elements of the undertaking despite acknowledged adverse effects, sustained professional objections, and extraordinary public concern.

When the public is invited to comment upon a project whose defining characteristics are effectively nonnegotiable, participation risks becoming an administrative exercise rather than a meaningful opportunity to influence the outcome.

That is particularly unacceptable for a project proposed entirely by the federal government, involving federal lands and nationally significant historic resources, without a demonstrated emergency requiring immediate construction.

The National Park Service should be setting the highest standard for public participation and historic resource stewardship—not demonstrating how quickly a controversial project can be moved through the required processes.

VII. Fundamental Questions About Legal Authority and the Undertaking Itself Remain Unresolved

The project also raises serious and contested questions regarding the Commemorative Works Act, the Height of Buildings Act, and the adequacy of environmental review.

The Department of the Interior has advanced an interpretation of the 1925 congressional authorization for Arlington Memorial Bridge that it contends permits the present proposal. NCPC's November staff recommendation adopts an implied-waiver rationale regarding the Height of Buildings Act.

These interpretations deserve careful scrutiny, particularly given the substantial difference between the two slender columns contemplated in earlier plans and the proposed 250-foot structure containing approximately 66,500 gross square feet of occupied space.

The Commemorative Works Act raises additional questions regarding congressional authorization, compatibility with existing commemorative works, and protection of open space and cultural resources.

The NCPC staff report indicates that the Department of the Interior considers the undertaking outside the

Commemorative Works Act and that NCPC relies upon the applicant's determination of applicability.

Given the significance of the proposed action and the substantial objections raised by preservation organizations, these issues should not be treated as incidental matters beyond the concern of responsible federal planning.

I am also deeply troubled by the September 20, 2026, presidential statement described in the National Trust's consultation correspondence, which reportedly introduced a potential military or security purpose involving drones, armed personnel, and ammunition storage.

The publicly available plans and environmental documentation do not clearly establish that such functions are part of the undertaking currently proposed for approval.

If these functions are no longer contemplated, the federal government should say so explicitly.

If they remain proposed, the responsible agencies should identify the associated physical and operational requirements, including any additional security infrastructure, access restrictions, surveillance measures, and changes to the public use of the facility.

Federal agencies must evaluate the undertaking they actually intend to construct and operate—not merely the version of the undertaking most convenient to describe in the administrative record.

An unambiguous, publicly documented project definition is a reasonable prerequisite to final approval.

VIII. Federal Stewardship Requires Restraint, Not Monumental Excess

The National Park Service is entrusted with resources whose significance transcends any administration, political program, or generation.

That responsibility demands professional judgment, thoughtful planning, and a willingness to reject proposals that would cause unreasonable harm to the historic properties and landscapes under federal stewardship.

The purpose of historic preservation is not to prevent all change. As preservation professionals, we recognize that the nation's built environment must accommodate new needs, new interpretations, and new expressions of national identity.

But change must be informed by an understanding of what makes historic places significant.

It must respond to context.

It must recognize that historic landscapes derive meaning from relationships developed over time and that those relationships cannot always be recreated once altered.

And it must acknowledge that the existence of sufficient authority and funding to construct something does not establish the wisdom of doing so.

The proposed Monumental Arch fails these tests.

Its extraordinary size is not evidence of its historical significance. Its classical vocabulary does not establish compatibility with its setting. Its invocation of national unity does not excuse the disruption of a landscape already designed to embody that ideal.

Nor does its association with the nation's 250th anniversary establish that its construction is necessary or appropriate.

The nation's capital is not an architectural trophy case, and its historic commemorative landscapes are not vacant opportunities for the exercise of monumental ambition.

They represent generations of planning, public investment, sacrifice, cultural meaning, and collective memory.

The integrity of these places should not depend upon whether their preservation is convenient to the political or architectural aspirations of those currently exercising federal authority.

IX. Request for Commission Action

For these reasons, I strongly urge the National Capital Planning Commission to reject the proposed final site and building plans for the Monumental Arch at Memorial Circle.

Specifically, I request that the Commission:

1. **Reject the proposed final site and building plans** because the undertaking would impose substantial and permanent adverse effects on nationally significant historic properties and is fundamentally incompatible with the historic commemorative landscape.

2. **Require meaningful reconsideration of less harmful alternatives**, including the no-build alternative, alternative locations, substantially reduced massing, and commemorative approaches that would preserve the existing historic spatial and visual relationships.

3. **Require a detailed and professionally defensible explanation of how the undertaking satisfies Section 110(f) of the NHPA**, particularly regarding the planning and actions undertaken to minimize harm to affected National Historic Landmarks.

4. **Ensure that unresolved questions of legal authority and project definition are satisfactorily addressed** before additional approvals or irreversible commitments are made, including the applicability of the Commemorative Works Act and Height of Buildings Act and any proposed military or security functions.

5. **Require meaningful additional agency coordination and public review for any substantially revised proposal**, including transparent consideration of its impacts on Arlington National Cemetery, the historic commemorative corridor, and the broader monumental landscape.

These requests are not radical. They reflect the fundamental expectations of sound preservation planning, responsible civic design, and accountable federal decision-making.

The Commission is not obligated to endorse an inappropriate project simply because other agencies have advanced it, substantial planning resources have already been committed, or the undertaking has reached an advanced stage of review.

Indeed, the greater the potential for irreversible harm, the greater the responsibility to exercise independent professional judgment.

Conclusion

The proposed Monumental Arch would permanently alter one of the nation's most important historic and commemorative landscapes. Its adverse effects have been acknowledged by the federal government, its design and location have been challenged by preservation professionals and consulting parties, and its advancement has generated extraordinary public opposition.

The country deserves better than a monument whose principal legacy may be the damage it inflicts upon the historic places surrounding it.

It deserves a federal government capable of distinguishing between genuine commemoration and architectural excess, between public engagement and procedural expediency, and between the authority to alter a historic place and the wisdom to preserve it.

The ability to construct a monument does not establish the need for one. The ambition to create something monumental does not justify compromising resources of established national significance. And the federal government's responsibility to protect our shared historic inheritance cannot be suspended simply because preservation interferes with a preferred design.

There is a profound difference between contributing thoughtfully to the nation's commemorative landscape and imposing an architectural spectacle upon it.

The former requires humility, restraint, historical understanding, and respect for the contributions of earlier generations.

The latter requires little more than power, money, and the determination to proceed despite the consequences.

The most meaningful contribution this generation could make to the historic landscape at Memorial Circle may be the decision not to build anything there at all.

I urge the Commission to recognize that distinction, reject the proposed Monumental Arch, and uphold the standards of historic preservation and responsible federal stewardship that the American people have every right to expect.

A triumphal arch constructed at the expense of historic integrity, public trust, and the dignity of our nation's commemorative landscape would represent no triumph whatsoever.

Respectfully submitted,
Gianna Kersch
SOI Qualified Architectural Historian and Historian
Historic Preservation and Cultural Resource Management Professional

Submitted in opposition to the proposed final approval of NCPC File No. 8778.

Name: Ricki Hurwitz
Date: November 2, 2026 5:57:51 pm

This monumental arch is unconstitutional & illegal. Not only does it need to be authorized and funded by an act of Congress, but it violates the Commemorative Works Act by memorializing a sitting president.

Additionally, it violates the 130 ft. height restriction in the DC Comprehensive Plan and in the Height of Buildings Act.

It would significantly adversely affect the surrounding monuments and Arlington National Cemetery. This president is not more important than those who served our country in the military, putting their lives on the line.

The president is trying to reshape spaces sacred to all Americans for his own glorification. He should be ashamed & embarrassed.

As a former resident & frequent visitor to DC, this plan is abhorrent to the dignity and memories embodied in this space of the city.

Do the right thing for the American people, now & in the future. Reject this project.

Name: Dale Oak
Date: November 2, 2026 4:07:14 pm

My name is Dale Oak, and I have been a resident of Northern Virginia for nearly 40 years. I strongly oppose the proposed construction of the "Triumphal Arch." This is the third time I’ve submitted comments in opposition.

Arlington National Cemetery, the Lincoln Memorial, and the surrounding area hold profound meaning for those of us who visit them frequently and reflect on the unique American story they represent. The arch’s proposed location between the Lincoln Memorial and Arlington Cemetery/Lee House will obstruct the line of sight between these important historical landmarks. Given its size and placement, the arch would undermine the vision held by the original planners, architects, and designers of the National Capital’s monuments and memorials.

The establishment in 1864 of the Cemetery on Robert E. Lee's land in a direct line of sight to the Lincoln Memorial is historically significant. The unobstructed vista is an invitation to visitors at both locations to reflect on the high cost of war and the significance of post-Civil War reconciliation. Constructing the proposed arch at Memorial Circle would interrupt this powerful visual connection. It would also dishonor the memory of the 430,000 veterans buried at Arlington National Cemetery, including 16,000 Civil War veterans.

I also have practical objections to placing an arch at Memorial Circle. The Circle is a high-traffic interchange that is

potentially risky to pedestrians and bikers who may wish to visit the site. In addition, a 250-foot-high arch could increase risk to air traffic heading into and out of Reagan National Airport.

At the very minimum, any monument of this scale built on federal grounds should be subject to congressional review and authorization. Congressional action is in keeping with our Nation’s long-standing principle that the citizens’ elected representatives should approve, by law, major public projects. Absent such approval, the proposed arch should not be built.

Attachment

Name: Carol Deibel
Date: November 2, 2026 3:43:12 pm

The proposed Arch is unacceptable on numerous levels. The Arlington Cemetery honors our bravest citizens and should not be overshadowed by a memorial arch. As a family member of two soldiers buried there, it pains me to have their sacrifices denigrated by a man who is obsessed with memorials to himself.

The proposed arch's size and scale would pose a hazard to air traffic in the D.C. area. The area is already a challenge for air traffic, and this would only worsen the problems, not to mention the vehicular traffic issues it would create.

Additionally, with an ever-mounting budget deficit, it is unconscionable to spend phenomenal sums on yet another vanity project, especially one that would significantly impact the historic Arlington Cemetery.

Name: Lydia Kendall
Date: November 2, 2026 2:46:12 pm

STOP the arch from being built. This is a monument to 1 pervert's ego. And it would do environmental, historical and cultural harm to our nations capital.

Name: Holly Taylor
Date: November 2, 2026 1:21:38 pm

Hello: I oppose construction of the New Monumental Arch, and I ask you NOT to approval the final site and building plans. This proposed project is detrimental to the historic landscape of DC and detrimental to the experience of seeing historic landmarks. It is completely inappropriate. Please reject it. Thank you.

Name: Jan Jacobs
Date: November 2, 2026 12:07:33 pm

Enough is enough don't you think? He has banners of his face up on public buildings and is relying on a "cult of personality" propaganda campaign. We're not a dictatorship yet. So no to the arch...plant a tree and flowers instead make it a little island of nature.

Name: Dennis VanLangen
Date: November 2, 2026 11:54:33 am

I am a United States Marine Corps veteran, and I strongly oppose the proposed 250-foot arch at Memorial Circle.

Marines are taught that honor is earned through service and sacrifice, never claimed through display. The approach to Arlington National Cemetery makes that principle visible to the whole country. Crossing Memorial Bridge, a visitor sees the Lincoln Memorial behind and Arlington House ahead, a line deliberately laid out to bind a nation back together after

the Civil War. It is a quiet, dignified passage that prepares the heart for what lies beyond the gates: row upon row of plain white headstones, identical in rank and size, for men and women who asked for nothing more.

This arch would destroy that passage. At 250 feet, it would stand more than twice the height of the Lincoln Memorial and wall off the view to Arlington House. A gilded triumphal monument at the doorstep of our national cemetery is not a tribute to the fallen. It is a monument to the people who ordered its construction, planted where the buried cannot object.

My specific objections:
1. It severs a protected historic landscape. Memorial Avenue and Memorial Circle are contributing elements of the National Register-listed Arlington National Cemetery Historic District. The Commission's own Memorials and Museums Master Plan found this circle unsuitable for a future memorial. Nothing about the site has changed; only the politics have.

2. It disrupts the cemetery's daily work. Arlington conducts some thirty funerals a day. The plan eliminates access to the cemetery from Washington Boulevard and contemplates using Memorial Avenue and the cemetery's own parking garage for arch tourists. Grieving families and funeral processions should never compete with sightseers and construction traffic.

3. Years of construction at the gate. Cranes, closures, and noise at the entrance to a national cemetery for years on end are a disgrace to every family making a final or annual visit, and an obstacle for elderly and disabled visitors, many of them veterans and widows.

4. It bypasses Congress and the public. Congress is supposed to authorize permanent commemorative works on federal land in the capital. None has been given here. The review panels were restocked with the President's appointees, a recommendation to reduce the height was personally rejected, and public comment, overwhelmingly opposed, has been treated as a formality.

5. It is built for vanity, not memory. The stated goal is to build the world's largest triumphal arch. Arlington needs no such boast. The Tomb of the Unknown Soldier says more with its silence than any 250-foot gilded structure ever could.

I took an oath to support and defend the Constitution, not any individual. The ground leading to Arlington belongs to the American people and to those who rest there. I call on the Commission to exercise basic judgment and simple decency, and to reject this project in its entirety.

Semper Fi,
Dennis L. VanLangen

Attachment

Name: Janice Patterson
Date: November 2, 2026 11:20:03 am

This "proposed" massive, bulky structure is not suitable for Washington, DC. Its proposed location obscures Arlington Cemetery and would accelerate the already-intense traffic in that area. The plan has not been addressed and approved by Congress. If it was a realistic plan to mark the nation's 250th anniversary, it would have been designed, developed and completed before July 4, 2026. As it is now, it is too big, too late, too personal, and too expensive. I urge the key planners and relevant decision-makers to opt out of both the placement and the design.

Name: Lisan Martin
Date: November 2, 2026 10:44:45 am

The Trump arch is completely out of scale and style of the monuments in DC. In addition these kinds of monuments are not made to living people and go through a long process of approval, planning and appropriation. This arch is revoltingly out of place and inappropriate for such a controversial president who is actually destroying our democracy while the other monuments are to our founding fathers who built our democracy. I urge you to reject this arch.

Name: Nancy Mansfield
Date: November 2, 2026 10:22:09 am

Please DO NOT APPROVE this project. It is out of scope with the rest of the monuments. Its scale and location will destroy oh-so-very intentionally created way in which the other monuments, including the cemetery, relate to one another.

Additionally, it is out of character with the way Americans honor their leaders. All other monuments have been created as a result of desire by the people to honor the individual. A monument created by the individual it is 'honoring' is not at all and keeping with the notion of an honor. Rather, it will be a permanently Goche reminder of a tribute one individual made to himself, but paid for by the American people. This is not appropriate.

Name: Kim Westervelt
Date: November 2, 2026 10:03:06 am

Title: Opposition to Monumental Arch for Memorial Circle in Washington, DC
Submitter/Category: Citizen Advocate

I am writing as a citizen who grew up outside Washington, DC, and visited Arlington Cemetery as a child and adult. I was taught to recognize the importance and meaning of the hallowed grounds and therefore, I am requesting that the proposed Monumental Arch be stopped immediately and all plans deleted.

I visited Arlington Cemetery as a child and was awestruck by the solemnity, the beautifully maintained site, and the continuing care taken to honor the men and women who died protecting this country. The eternal flame for President John F. Kennedy is simple yet stunning and powerful. It is hallowed ground and continues to inspire awe and pride of service to this country in pictures and personal visits. It is one of the first places out of town guests want to visit.

The proposed arch design will not only block the view of the approach to Arlington Cemetery, but it would also cast shadows on more than 50,000 grave locations across 29 sections, and two memorial areas, one of which is the grave of President John F. Kennedy and the Eternal Flame. It will cause Robert F. Kennedy and Edward M. Kennedy's graves to be in shadows during parts of the day. It will interrupt sight lines from the Lincoln Memorial across Memorial Bridge, designed to symbolize the reconciliation of the North and the South after the Civil War.

This is unacceptable for every man and woman who died in service to our country. These soldiers earned the honor of burial in Arlington Cemetery by serving, but the proposed arch does not memorialize anyone who served. It will serve as an insult to those who gave their lives.

This arch is a project that veterans and military groups deplore, will cause enormous traffic problems, does not make sense as something useful for defense, will cause aviation and flight safety hazards, and bypasses environmental and local reviews.

Most Americans are vehemently opposed to this proposed arch. I urge you to respect their opinions and stop any planning and construction on the proposed Monumental Arch.

Thank you for the opportunity to comment.

Kim Westervelt
Maryland

Name: Marilyn Murchison
Date: November 2, 2026 9:29:44 am

Any local will tell you there is already a large and confusing amount of car traffic in that circle. Further, the NPS itself has said that there would be an adverse effect on other monuments in the area, including the Lincoln Memorial and Arlington National Cemetery.

Name: Joann Auth
Date: November 2, 2026 9:02:49 am

1. Is it necessary for the sustainment of public health and safety in D.C?
2. Is there overwhelming public acclaim to build it?
3. Would it reflect the historical values of our democracy?
4. Would it fully comply with the policies, laws, and spirit of Washington, D.C. maintenance and development?
5. What image would it convey of our country and its diverse population?

Name: Daniel Morrison
Date: November 2, 2026 12:09:08 am

I am totally opposed to the construction of the so-called Monumental Arch, which would tower over the Lincoln Memorial and disrupt the iconic vista from the Lincoln Memorial across the Potomac to the Arlington National Cemetary. The arch is an imitation of the Arc de Triomphe in Paris and does not belong in DC. It represents another chapter in the ongoing vandalization of the nation's capital by Donald Trump's narcissistic vanity projects.

Public Comments for New Monumental Arch

Total comments: 22

November 3, 2026

Name: Carol Galle
Date: November 3, 2026 11:46:02 pm

I do not support the construction of this arch. It's unnecessary, a waste of money and does not align with our history.

Name: Christopher Connell
Date: November 3, 2026 11:34:20 pm

I have pre-registered as a speaker (Speaker # 85) for the November 5th meeting (New Monumental Arch action item). Please accept my written testimony for the upcoming meeting.

Attachment

Name: Abby Smith
Date: November 3, 2026 10:17:21 pm

To the NCPC Commissioners:

I write this comment to express opposition to building the proposed Monumental Arch on Memorial Circle. I write as both a long-time resident of Washington, DC and as the daughter of a WW2 veteran buried at Arlington Cemetery. I frequently walk by and drive by Memorial Circle. I also frequently visit and walk through Arlington Cemetery.

I am surprised that a project that has been opposed by so many people and organizations for so many different reasons has arrived at the point that the NCPC's Executive Director has recommended approval. I can't help thinking that the NCPC has forfeited its independence and accepted twisted logic from the applicant to approve this project.

This arch is going to have the biggest negative impact on those of us who make Washington, DC our home, so I ask the commissioners who represent the interests of the residents of the District of Columbia to vote against approval. These commissioners would be Arrington Dixon and Linda Argo who are appointed by DC Mayor Muriel Bowser, the representative for DC Council Chair Phil Mendelson, and the representative for DC Mayor Muriel Bowser.

But to all the commissioners, listen to the people who have expressed in the hundreds (maybe thousands) of comments to the NCPC that we simply do not need or want the proposed arch which is ill suited in so many ways to the proposed site.

Respectfully,
Abby Smith

Addendum to Comment

I express in the comment above that NCPC has used twisted logic to recommend approval of this arch. Below is one example of this twisted logic.

In previous reviews of the arch, the NCPC challenged the proposed height of the arch as exceeding the height limits of the Height of Buildings Act. The NCPC expressed that it had always honored the Act, but now, the NCPC has accepted the applicant's justification for exceeding the Height of Building Act's height limits as expressed by the Executive Director's Recommendations.

"Notes that, upon consideration of the supplemental materials submitted by the applicant and deliberated among the Commissioners, the Commission agrees that in 1925 Congress authorized a plan submitted by the Arlington Memorial Bridge Commission in 1924 that included elements above the limit prescribed by the 1910 Height of Buildings Act and

gave the Arlington Bridge Commission the discretion to revise the design, which discretion is now exercised by the Department of the Interior.
Finds that, based on the submitted materials and deliberations by the Commission, because Congress implicitly waived the Height of Buildings Act in its 1925 action, the revised design is not required to comply with the Height of Buildings Act. Approves the final height of the project as proposed by the applicant."

I'm a little bit stunned that the Commission is accepting the applicant's argument that Congress, in 1924, "implicitly waived the Height of Buildings Act." (I'm assuming this is referring to the two 166-foot columns planned but never built at Memorial Circle). Those columns are so different from this arch that any implicit waiver in 1924 would absolutely not be applicable to a massive arch in 2026.

Name: Martha LaBare
Date: November 3, 2026 8:53:01 pm

Let's honor the military and Arlington Cemetery, Lincoln and the Lincoln Monument, the design and sightlines and aesthetics of WDC, and common sense. No "defense" arch that will be a target and an eyesore.

Name: Anne Jaegerman
Date: November 3, 2026 8:34:55 pm

The proposed arch in Memorial Circle will not be a monument to our country's history, but rather an expensive and tragic reminder of an era in which the Constitution was ignored.
- The Arch has not been requested by citizens, nor has it been authorized by Congress.
- -The Arch violates the height limit and the McMillan Plan. It bears no resemblance to the two 166 foot pillars which were once included in the plan for Memorial Circle. Those would not have blocked the view line between the Lee House and the Lincoln Memorial. The visual connection between the cemetery and the Lincoln Memorial has a deep meaning to veterans and their families. It is a symbol for all of us of reunification after the Civil War. The Park Service has identified many other sites that will be negatively affected by view obstructions.
- -The Arch would turn what many veterans consider to be sacred ground into a tourist attraction. It would encourage tourists to turn their backs on Arlington Cemetery to view the city. During construction, the noise and commotion would be disruptive to funerals.
- -The Arch violates the comprehensive plan which calls for monuments to have a positive impact on the local community. Instead the Arch will disrupt traffic patterns for thousands of commuters, as well as those wishing to enter the cemetery from Virginia. It will have a negative effect on the peaceful park area used by cyclists and runners, and enjoyed by drivers on the Parkway.
- The Arch design was hasty, largely driven by the taste of one man. It has not been subject to a design competition, or a sufficient design review. It is not held in high regard by architectural critics, or many citizens. Concerns about visual clutter due to light poles and sign stanchions have not been resolved.
- The recent suggestion that an eternal flame would provide aviation safety is ridiculous. It is hard not to believe that this is a further effort by the president to compete with national heroes, in this case, John F. Kennedy, whose grave site includes an eternal flame. It also seems ridiculous to prescribe a flame as a safety measure.
- Perhaps we can assume that the recent suggestion that the Arch could serve as a base for drones, snipers or munitions was simply meant as a joke and a distraction. If not, certainly the whole plan needs to go back to square one.
-
Anne Jaegerman

Name: Marietta Phillips
Date: November 3, 2026 7:01:17 pm

To The Members of the NCPC:

Our nation's capital is a city build amidst vast and lush natural beauty. There isn't more I can say than what has already been offered by veterans and families regarding the sacred site that Arlington National Cemetery has become. LISTEN TO THEM!!!

The Vanity Arch would be a horrific blight on grounds preserved for those who have served our country. Moving forward with this project would be an embarrassment for this Commission. The Arch will not stand, even if it is built. It will be torn down. Your carelessness and lack of stewardship regarding funds is indefensible. This project will disrupt wildlife and the natural beauty. It will disrupt the services of those burying their loved ones. Your approval of this will be your legacy, and the fight against it will be the legacy of all Americans who oppose it - a far greater number than those who support it.

Name: Amy Bergner
Date: November 3, 2026 6:17:42 pm

I am the daughter of a WWI combat veteran buried at Arlington Cemetery, and a longtime resident of Northern Virginia. I oppose the placement of the arch so close to the Cemetery, where it will cast a shadow over my parents' graves and - given its proposed size and placement, disturb the peaceful rest they deserve after their sacrifices for our country. It is a dishonor to all veterans to impinge on this hallowed ground with a project that is so out of step with current architecture and not wanted by the vast majority of people. How will family of those buried at Arlington Cemetery even be able to access their family's resting place if traffic is so disrupted by this proposed arch, and what will happen when the construction disturbs the very ground they lie in?

As a longtime area resident, I am also appalled that this project would be so quickly rammed through without proper consideration of traffic (air and land), disruption to public transit, and sightlines through to the National Mall and monuments. The arch would violate the height restrictions long imposed on construction. It is not a fitting memorial of our nation's 250th anniversary, as approvals have not taken into consideration the views of the people across the country and in the local communities.

Please put a hold on this ill-founded, ill-conceived project.

Name: Helen Epps
Date: November 3, 2026 6:03:11 pm

I wish to submit my comments AGAINST the construction of the Arch in Memorial Circle in from of Arlington Cemetery.

The only reason I can see for such an Arch is because Donald Trump wants it to reflect on his personal glory.

The reasons against it are numerous. I am not an expert but I am someone who has lived in DC for 50 years ,working for many years in Virginia and going across the Memorial Bridge on my commute. I know the area well. I have also had the opportunity to visit Arlington National Cemetery on quite a few occasions.

Among the most salient reasons to reject this project are:
*There is a very real possibility that an Arch of the proposed size would present a significant hazard to all aircraft leaving and landing at Reagan National Airport which is essentially only a mile away. I do not think that this concern has gotten sufficient attention.
*The construction of the Arch and the post-construction re-routing of the many vehicle arteries around it will also pose difficulty to drivers in the area and very possibly cause an increase in accidents.
*The disrespect that this project shows to the Veterans who rest in the Cemetery, and their families, is huge. Not only does it take away the focus from the hallowed ground of these heroes, but it literally will shadow their resting places. It's construction will interfere with on-going burials.
*The Arch would ruin the open sight lines that are part of the original design of the city. which have made DC such a monumental city and National Capitol.
* The construction of the Arch will break any number of laws, including the one which bars construction on national parkland without Congressional action and the 160' height limit for the District of Columbia.

It is highly questionable why there seems to be a bum's rush to get this project underway and to construct 20 hours/day while such projects usually move slowly and take the time to study and evaluate the effect of such a change.

There is much more to be said and it will be said more eloquently by others. Please take this Comment as a strong NO vote fonthis project's approval.

Name: Mary Doyle
Date: November 3, 2026 5:35:44 pm

I support the comments of Public Citizen especially those of veterans like Michael Lemon. There is absolutely no reason to build such a monstrosity in this location. To desecrate those buried in Arlington Cemetery because of the vanity of a President is beyond the pale. This cannot be built.

Name: John Ayers
Date: November 3, 2026 4:53:09 pm

Attachment

Name: Daniel Cortez
Date: November 3, 2026 4:25:16 pm

Arch statement
I am Daniel P. Cortez from Stafford VA, United States Marine Corps Retired. I am a wounded Vietnam veteran that served 20 plus years in the Marine Corps and was decorated for extraordinary heroism.
I am part of the amicus brief being sponsored by the Vietnam Veterans of America, the Korean War Veterans Association, The Chosen Few, The Military Order of the Purple Heart, and the Veterans for America First.
As the chairman of the National Vet Court Alliance, our group and several others were instrumental in passing the Veterans Treatment Court Coordination act of 2019.
We are a nonprofit organization that's dedicated to the prevention of thousands of veterans suicides that occur each year. Sadly 17 or more veterans on the average commit suicide a day, due to combat and training stresses found in theater and garrison.
Our alliance works with and represent over 500 organizations like ours in the nation that establishes specialized veteran dockets in all U.S. Federal, state and tribal jurisdictions for those veterans that struggle with substance abuse and cognitive impairments, helping them obtain what they need to avoid unnecessary incarceration.
I am a court mentor with the Rappahannock Regional Veterans Docket in Spotsylvania Virginia.
What is clear to not only this veteran and our organization, but the petitioners of this brief is we acknowledge the arch and the present construction plan per the 1925 act permits the construction of this structure on Columbia island exceeding height restrictions that were set by the height of building decks and in my opinion in the opinion of others authorizes the immediate construction upon your approval of the proposed arch.
This structure like others in Washington such as the Lincoln Memorial, The Jefferson Memorial, the Washington War Memorial, World War I, II, Korean, Vietnam and Middle East Memorial to name a few, remain therapeutic and provide pride and demonstrates great patriotism.
Sadly I am aware of disgruntled Vietnam veteran malcontents who needed professional help then and need professional help now, refuse to see the arch as our other veterans see our patriotic monuments…. as a lifesaving a structure that enhance the graves of our war dead at Arlington National Cemetery and provides comfort to the living veteran and gold star families.
A reported recent attack on one of the Marine Corps most revered monuments, a copy of the Washington War Memorial located near my home in Triangle, Virginia, by an illegal alien rebuffed by Marine Corps recruiting officials, demonstrates the need not only to build this structure but employ responsible security measure perhaps in the form of drones to not only protect this structure but that of our other national treasures as well from demented agitators.
We who have given blood for our nation or just served honorably know these structures are not based on megalomania but pride, purpose, prayer and above all patriotism found on both sides of the aisle regardless of who sits in the White House or controls congress.
This arch similar in design such as others around the world honoring war dead and service of the living through prayer and patriotism will save lives and we implore this respected body to pass the requirement to construct this arch as soon as

the law allows without delay as testament to the service of all men and women in uniform in further celebration of America’s 250th anniversary.

Name: Clifford Nancarrow
Date: November 3, 2026 3:56:52 pm

Please find attached my PDF formatted statement in opposition to this project.
The comments are duplicated here as may be helpful.

New Monumental Arch
NCPC File Number: 8778
Comments for NCPC Meeting November 5, 2026
Good morning,
I am writing as a United States Navy Veteran from Colorado for the third time to again implore the members of the National Capital Planning Commission to disapprove the request for the siting and construction of this proposed arch. Compelling arguments in opposition to this project have been respectfully made by any number of qualified and credentialed architectural professionals and historical preservation authorities. I have very little to add that you might find persuasive in completing your deliberations but invite you to consider the content of these two websites relating to the history and purpose of the Arlington Memorial Bridge and to a photographic history of Arlington National Cemetery, particularly the 1864 photo of Union soldiers standing on the Arlington House hillside. The proposed arch can only be viewed as an unwelcome and unnecessary intrusion and desecration of the “spacious skies” between the Lincoln Memorial and the hallowed ground of Arlington National Cemetery, open space long intended by those with vision and aesthetic subtlety to serve as a testament to the unity of our nation and its higher principles and purposes. Think of the opportunity you have before you at this meeting to be able to later tell your grandchildren and all future generations of Americans that you summoned your better angels and voted to preserve an important symbolic corridor that in itself speaks to honoring all that is good about our nation in its 250th year.
Thank you.

https://www.nps.gov/gwmp/planyourvisit/memorialave.htm?ftag=YHF4eb9d17
https://www.nationalreview.com/photos/arlington-national-cemetery-history/
Clifford A. Nancarrow

Thank you

Attachment

Name: Mark Coryell
Date: November 3, 2026 2:23:46 pm

The monument proposed by President Trump near the Arlington Memorial Cemetary and the LIncoln Memorial is inappropriate. It will tower over the Lincoln Memorial. It will be an eyesore that blocks views. It could be dangerous to air traffic overhead. In short, the proposed Triumphant Arch is an eyesore. It's a copy, basically, of the Arc de Triumph in Paris, France. It's not an original or creative design that reflects the hopes and desires of the people of this country. Instead, it is an pipe dream of a vain President and want to be Dictator who has little respect for democracy. Please prevent this awful project from happening. Deny all permits and permissions for this project and leave the site as it is.

Name: Alison Turner
Date: November 3, 2026 2:08:48 pm

To: Commissioners and Staff
National Capital Planning Commission
Subject: Formal Objection to the Proposed Triumphal Arch (Memorial Circle / Arlington)
I veteran family member and I am in opposition to the project.
The design and context of a 250-foot height, scale, and gilded design clash with the solemnity of Arlington National Cemetery and the historic D.C. monumental core.

The project does not follow legal or procedural process. For example the absence of explicit Congressional authorization under the Commemorative Works Act and the failure to complete rigorous Section 106 and environmental reviews.
The project lacks Fiscal and Civic process as public resources and park service oversight should target existing infrastructure and maintenance backlogs rather than unbudgeted, politically driven structures.
I request that the NCPC formally reject or postpone approval of the site and building plans.

Name: Leslie Lincoln
Date: November 3, 2026 1:08:32 pm

Please do not allow this arch which is totally out of scale with the careful thought and planning which went into the design
of the Capital.

Name: Soraya Assar
Date: November 3, 2026 12:38:29 pm

The proposed Monumental Arch is a vanity project for one individual. It does not represent anything else. It will destroy the view from the Arlington cemetery to the Lincoln Memorial. A view that was specifically created to help unite a divided nation and remind future generations of the cost of conflict. The Arch will create significant safety issues by building in a high traffic area and on ground that won't sustain this structure. It will cause issues with flights and potentially cause death to those flights negatively impacted. Fiscally, this is money that can be spent in a myriad of ways that would positively impact Americans. Please do not allow one individual to continue to cause so much chaos, chasms, and danger to this country.

Name: Christine JENSEN
Date: November 3, 2026 11:43:13 am

Arlington National Cemetery is the United State’s most hallowed ground. It was very purposely sited in that location by the Quartermaster General, Montgomery Meigs, to bring the dead of the civil was to the doorstep of those he held responsible. It has become one of the cornerstones for the placement of the monuments to those who have contributed to and have sacrificed all for the United States, the Lincoln Memorial and Memorial Bridge led to that ultimate of memorials, the cemetery itself. To look out from the west front of the Capitol and see in the distance the cemetery says so much, that we value the service of the men and women buried there so much we placed their memorial in view of the federal government.

I view the proposed monument in much the same way as the speakers at the dedication of the Gettysburg National Cemetery. The first speaker talked for almost 2 hours and no one remembers what he said. Abraham Lincoln knew that value of simplicity, 272 words which ring as true today as in November 1863. Key in those words, “The brave men, living and dead, who struggled here, have consecrated it, far above our poor power to add or detract.”

An oversize and gaudy arch, purported to have defensive purposes, is unnecessary and distracts from the sacred space that is Arlington National Cemetery.

If the incumbent and the federal government want another memorial it would be so much more meaningful to provide care and support to our veteran’s and their families; health care, housing needs, education, mental health support would have day to day and lasting meaning.

Let the cemetery itself continue to serve as the singular memorial to “The brave men, living and dead”.

Name: David Otto
Date: November 3, 2026 11:01:54 am

Good afternoon, Commissioners.
I represent Third Act DMV, the combined DC, MD, and VA—area chapter of Third Act, a national movement of retirees and elders working to protect democracy and confront the all too real climate crisis.
Here in the DMV, we've given that mission a distinctly local expression, emphasizing the preservation, conservation, and stewardship of public lands, historic landscapes, and cultural institutions.
We regard these places as a shared democratic inheritance, entrusted to us by previous generations and held in trust for those who follow.
Our guiding principle is simple:
Public places belong to the public. Temporary officeholders are their trustees, not their owners.
That brings us here today. But I want to speak about something larger than this arch.
There are two competing understandings of democracy at work in America today.
One recognizes that ours is a pluralistic society. That disagreement is legitimate, even necessary. That institutions like this Commission exist to give the public a voice in decisions affecting our common inheritance.
This understanding rests on deliberation, accountability, separation of powers, and the rule of law.
The other begins with a leader who claims to speak for the people. His electoral victory becomes an all-purpose mandate. His desires become public priorities. His appointed functionaries find—or invent—the authority and justifications to make those desires a reality.
In the first, institutions constrain power. In the second, they become instruments of power.
And that distinction brings us to Memorial Circle.
The President wants a triumphal arch. An enormous, 250-foot monument along one of the most historically significant ceremonial corridors in America.
This is not an empty parcel awaiting improvement. It is a carefully composed landscape connecting the Lincoln Memorial, Arlington Memorial Bridge, and Arlington National Cemetery.
A landscape that honors sacrifice, remembers the dead, and gives physical expression to our national history.
It belongs to the American people.
Consider what has happened during this review.
The National Park Service identified adverse effects on historic properties and nationally significant landscapes.
Consulting parties raised substantial objections. The Advisory Council on Historic Preservation terminated consultation toward an agreement resolving those adverse effects.
Yet the project continued toward final approval.
We've watched an elaborate machinery of government mobilized around a monument whose necessity has never been convincingly established.
Architectural renderings. Transportation studies. Environmental findings. Lighting plans. Agency consultations.
All devoted to answering one question:
How do we build what the President wants?
But there's another question. One that should have come first, through genuine public deliberation:
Should we build it at all?
That is the difference between stewardship and servitude.
Commissioners, institutional integrity isn't measured merely by whether the paperwork is complete.
It's measured by the independence of your judgment. By your willingness to weigh evidence that challenges the desired outcome. By whether public participation can genuinely affect a decision.
And by your willingness to say no.
I'm a veteran, long-time military spouse, and recent retiree from federal public service. I understand how political pressures accumulate, and how easily bureaucratic processes can become exercises in justifying decisions already made.
That is precisely why institutional independence matters.
We are not asking you to defy democracy. We are asking you to practice it.
An electoral victory does not confer ownership of the nation's cultural inheritance, nor relieve public officials of their independent obligations.
Perhaps this Commission will approve the arch today. Perhaps the outcome has already been decided.
But the public record should reflect that citizens came forward, defended this landscape, and insisted that government answer to something greater than one man's ambition.
The question before you is not simply what kind of monument will stand at Memorial Circle.
It is what kind of institution will stand behind the decision.
On behalf of Third Act DMV, I ask you to reject the proposal.
Be stewards of the public trust, not custodians of a presidential wish.
Thank you.

Attachment

Name: Shelley Kilbon
Date: November 3, 2026 10:51:27 am

The proposed Triumphal Arch would destroy one of America's most sacred and symbolic landscapes. Veterans and park advocates oppose the arch and have raised serious concerns about its size, location, cost, and impact. The addition of an “eternal flame” would create a “sky glow” that would be illuminated 10 times the brightness of the Washington Monument. In addition, the Arch would increase morning traffic delays by 50% in and around Memorial Circle. These numbers do not include visitors to the Arch during the morning rush, which suggests traffic delays would be even greater! It's a tacky thing to add to such an iconic place, and the cost, while so many citizens are struggling with daily bills, is absolutely unconscionable. Please don't allow this thing to be built.

Name: Kimberly Moyers
Date: November 3, 2026 10:45:59 am

My Letter for the Triumphal Arch.

Attachment

Name: Mark Wilkins
Date: November 3, 2026 8:58:16 am

I am a retired military officer who served 30 years defending our country around the world. Like most veterans, I oppose the placement of the arch at the entrance to Arlington National Cemetery in the strongest possible terms. It desecrates our nation’s most hollowed grounds and disrespects the sacrifice of the over 400,000 veterans buried there. Think this through- a 12 story monument with an observation deck on top enabling tourists to gawk at and video military funerals and families visiting the gravesites of their loved ones. It’s outrageous and I sincerely hope the committee can come together and either shelve the entire endeavor or find a more suitable place for it. I plan to be buried there and don’t want this monolith casting a shadow over my grave.

Name: William Cook
Date: November 3, 2026 12:04:45 am

NCPC should not approve or endorse the proposed arch, which would encroach on more than 40 historic properties and harm the memorial landscape surrounding Arlington National Cemetery.

Public Comments for New Monumental Arch

Total comments: 26

November 4, 2026

Name: Don Broussard
Date: November 4, 2026 12:01:35 pm

The NCPC's rush to approve this arch — when there are legitimate pending questions about its legality — makes a mockery of the fundamental principles of planning review incumbent in the NCPC's organic act and in city planning practice in general.

1. No building or structure has ever been approved by the NCPC that exceeds the Height of Building Act standard of 160 feet since the Commission's inception.

2. No amount of sophistry can claim that the Arch is authorized by the by the 1925 Act authorizing the Arlington Memorial Bridge. An Arch is not the same as two towers.

3. The Arch is a building — which will have constant human occupancy and is therefor subject to height limits.

4. The recent proposal to include military weapons in or around the proposed Arch fundamentally changes the nature of the project and its impacts — which the NCPC has completely ignored.

Name: Torey Carter-Conneen
Date: November 4, 2026 12:00:56 pm

See attached

Attachment

Name: Barbara Wilson
Date: November 4, 2026 11:59:58 am

Our beautiful Capital is being desecrated by a would-be dictator. How can this be happening? How can this go forward? Is he going to be allowed to destroy that which we have built for 250 years ... to feed his megalomaniacal hunger? It's a tragedy that has spun out of control, in one of the most beloved and unique places on our Earth.

Please, we beg that you use any and all powers that be, to put a stop to this destruction and desecration of our beautiful city. Both of our fathers served in the Navy in the Pacific. Our mothers volunteered for the Red Cross and grew victory gardens ... sacrificing much for the common good to defeat fascism in WWII. Our parents loved this country , this government and our leaders. They valued and trusted the beliefs and laws of our wonderful democracy.What can we do now? We feel so helpless.

We hope that our words in some small way will join with the words and feelings of our fellow citizens and friends around the World ... Please stop this madness. Please continue to fight to restore and to improve our wonderful Capital.

Thank you,

Steve & Barbara Wilson

Name: Caitlin McCurdy
Date: November 4, 2026 11:56:54 am

Good morning,

Please find attached Cultural Heritage Partners' comment opposing the Triumphal Arch.

If you have any questions or need additional information before tomorrow's meeting, please let us know.

Kind regards,
Caitlin

Caitlin McCurdy
Attorney at Law
Cultural Heritage Partners, PLLC
Direct/Text: [redacted]

Attachment

Name: Kevin Wheeler
Date: November 4, 2026 11:55:01 am

please OPPOSE the monumental ARCH. the arch's scale is ugly and dwarfs DC's architecture, destroying the beautiful views between the lincoln memorial and arlington cemetery. the arch's 250 foot height violates the building heights act, and therefore is against the law. the 250 foot height puts passengers flying in and out of DC National Airport, and those living in the flight path, in danger, and the Administration's commitment to conduct a full study with NPS to evaluate the long term impact of navigating the airspace should be done by a third party in advance, not afterwards, of NCPC's consideration. the arch's justifications continue to shift - DC being the only major western capital without an arch (childish), 250th anniversary (duplicative), gives visitors an observation deck (also duplicative, i.e. old post office bell tower, washington monument, natl cathedral, Capitol Dome, dozens of building rooftops), and recently national security (redundant, puts a bulls eye highly populated area…). construction will create years of traffic and noise pollution.
the gold statues and ornamentation clash with DC's understated architectural beauty as envisioned for a gvt for the people rather than for out of touch kings and queens. vets have sued to stop it. the arch is so unpopular it has received the second most number of written objections except to the ballroom. the arch does not have congressional approval as mandated by law. please NO ARCH.

Name: Cynthia Morrison
Date: November 4, 2026 11:54:07 am

Please pardon me if you have already received my submission.
I did not get a confirmation, because I think I was timed out, so I am trying again.

I respectfully request that the Commission open and review the attached PDF in its entirety and include it in the official record for NCPC File No. 8778.

This consolidated submission contains my comprehensive written statement concerning the proposed Triumphal Arch at Memorial Circle, including historical documentation, federal agency findings, environmental and transportation concerns, military and security implications, supporting photographs, a detailed inventory of potential cumulative impacts, and principal sources with supporting hyperlinks.

It also includes my previously submitted comments to the Advisory Council on Historic Preservation (ACHP), together with documentation of their submission date.

As a Gold Star mother whose son served in both the United States Air Force and United States Space Force, I respectfully ask the Commission to give careful consideration to the potential consequences for Arlington National Cemetery, grieving military families, and the historic memorial landscape connecting Arlington with the Lincoln Memorial.

Thank you for your time and consideration.
Cynthia Morrison

Attachment

Name: Antonio Vintro
Date: November 4, 2026 11:53:04 am

To the members of the Committee

I am writing to voice my strong opposition to the proposal to construct a monumental arch between the Lincoln Memorial s and Arlington cemetery .

-As you can see in the attached photo the arch will block the visual axis between the Lincoln and the Nations cemetery. Blocking this view destroys the essential symbolic relationship between the two memorials .

- The proposed arch is oversized and will overshadow physically and metaphorically the sacred space that is Arlington cemetery .

-With a 40 trillion dollar deficit shouldn't we be saving our money

Thanks for your consideration

Cordially

Antonio. Vintro image0.jpeg

Name: Priya Jain
Date: November 4, 2026 11:53:02 am

Attachment

Name: Brian Parizot
Date: November 4, 2026 11:52:09 am

My wife and I moved to Washington, DC in January of this year. Not for work–we're both recent retirees. And certainly not because it's an inexpensive place to live on a fixed income. We moved here because we fell in love with the city over the course of 16 years of visiting it on and off, with and without our children.

We hear a lot lately about "standing", as in a plaintiff must have standing to file a lawsuit, such as those against the arch.

I want to talk about another form of standing—social standing. If legal standing is required to initiate a lawsuit, I believe social standing is required to effect significant productive change in a community. As a new resident in DC, I may not have standing to object to the arch, at least not compared to the veterans whose valor is memorialized in the city's monuments, and whose experience of Arlington Cemetery is diminished or damaged by the proposed Arch. And I may not have standing compared to the lifelong residents here who have seen the ups and downs of decades of administrations trying to put their stamp on this city, and who would benefit from a more humanitarian use of the millions of dollars required to build the arch.

And this lack of standing is exactly the point.

Because while this president has been here longer than me, he also doesn't have standing to undo decades of respect for norms and traditions, like leaving the view from the Lincoln Memorial to Arlington Cemetery clear.

The people of this city and this nation don't want the Arch, for reasons that have been listed here today and elsewhere for months. This is about respect for a city and its people who have earned that respect, by their service and their

commitment to their home city and country.

I call on this President to defer to those who have standing to say what's right for this place, this city and this country. Respect decades of tradition and the wishes of the people you are supposed to be serving. Stop the plans for the arch.

Name: Judy Chesser
Date: November 4, 2026 11:40:59 am

I am testifying on behalf of the Committee of 100. I am #55 on the witness list. Thank you, Judy Chesser

Attachment

Name: Charles Birnbaum
Date: November 4, 2026 11:36:37 am

Attached is the testimony Charles A. Birnbaum, Founding President & CEO of The Cultural Landscape Foundation, plans to present to the NCPC on Thursday, November 5. He is currently number 78 on the list of speakers scheduled to testify.

Sincerely,

Nord Wennerstrom
Director of Communications
The Cultural Landscape Foundation
1711 Connecticut Avenue NW, Suite 200
Washington, DC 20009

Attachment

Name: Maria Gillette
Date: November 4, 2026 11:35:00 am

I strongly oppose the proposed New Monumental Arch.

I find the design extraordinarily ugly, unnecessary, and completely out of place in Washington's historic monumental landscape. It would not enhance this nationally significant setting. It would diminish it.

As many architects, planners, historians, and concerned citizens have warned, Washington's beauty derives from its careful balance, dignity, simplicity, and respect for historic sightlines. This proposal moves in the opposite direction. The arch's enormous scale would disrupt the character of the capital and compete with, rather than complement, the landmarks that define it.

I urge the Commission to reject this project and preserve the architectural integrity of our nation's capital.

Name: Ross Wells
Date: November 4, 2026 11:29:10 am

My parents were GI's who served in the army during the second world war. Both are buried at Arlington National Cemetery, on hallowed ground. My father volunteered and served for 4 straight years in Europe under the command of General Omar Bradley. He was wounded during the London Blitz and spent time in a hospital recovering until he was able to rejoin his company, right after the French counter-invasion on D-Day. My mother was a WAC, a volunteer in the Women's Army Corps and served stateside as an x-ray technician for over 3 years. They met after the war ended and started our family a few years later. Neither of them liked to bring up the subject of the war but if we asked, they would share some of what they went through. They were part of the wholesale mobilization of our country fighting the

murderous evils of fascism. Our whole country sacrificed mightily for our own freedom and that of our allies, who refused to be conquered by the murderous AXIS powers.

Now, our own President has cozied up to the worst authoritarian leaders in the world. His military defies international law and kill suspected drug carriers without trials or evidence. He is enamored of world leaders who hold absolute power and oppress their own people, such as Saudi Arabia, North Korea and worst of all Vladimir Putin of Russia. Putin invaded Ukraine to overthrow its elected government. But Ukraine has showed the world what bravery and sacrifice look like. Meanwhile, our President is throttling any hope of peace negotiations by giving Putin everything he wants: disparaging Zelenskyy: abandoning sanctions and withholding miliary satellite data and badly needed weapons. This allows Russia to continue killing hundreds of thousands of Ukrainian soldiers and innocent civilians. President Trump, is now complicit, in Putin's drive to attack and annihilate a democratic, sovereign nation. His actions threaten not just the good people of Ukraine but the entire world.

Why is this project even being considered? Rushing construction on a gargantuan vanity-arch, just outside the hallowed grounds of Arlington Cemetery and directly across from the Lincoln Memorial is patently illegal. Building this vanity monument requires approval from Congress -- and Congress has NOT authorized it. YOU have the power to reject this ill-conceived project and stop it in its tracks. Is approving an illegal monument to the most corrupt President in U.S. history the kind of legacy that you want your children to remember you by? Those of us who have loved ones who sacrificed and died so we could be free of fascism are looking to YOU for justice. Please show the world that you all have spines and vote this damned-arch-down.

Thank you

Ross Wells
[redacted]
Takoma Park, ME 20912
[redacted]

Name: James Dougherty
Date: November 4, 2026 11:21:59 am

My written testimony is attached. My organizational authorization is on top

Attachment

Name: Steve Boyd-Smith
Date: November 4, 2026 10:58:10 am

I am writing to oppose construction of the proposed monumental arch.

Broadly-speaking, I believe in progress. I believe change is necessary. I also believe in the inherent value of history, design, art, and nature. The proposed arch is an affront to the beautifully planned balance of the those last four. It would desecrate 40 historic properties, most importantly, to me, Arlington National Cemetery. As such, the Commission's approval would go against its mission to "preserve and enhance the extraordinary historical, cultural, and natural resources and federal assets of the National Capital Region...."

I urge you to reject the proposed monumental arch.

Name: Laura Driemeyer
Date: November 4, 2026 10:51:55 am

Dear Commissioners,

I strongly urge the National Capital Planning Commission (NCPC) to oppose the plan to construct the Triumphal Arch at

Memorial Circle for the following reasons:
• Such projects require Congressional approval under the Commemorative Works Act which mandates that commemorative projects on federal land in Washington, D.C. must be authorized by Congress and to date that has not occurred
• The design of such projects must incorporate reasoned consideration of environmental and historical impacts that it may have on the National Environmental Policy Act of 1969 and the National Historic Preservation Act of 1966
• Due to its overall design, scale, and enormous gilded statues it will destroy the integrity of the comprehensive design of the L'Enfant and McMillan plans for the Nation's Capital, which includes open space, clear sightlines, and commemorative purpose
• It will adversely affect multiple historic properties including several National Historic Landmarks, most notably one of this country's most iconic landscapes and places of solemnity and significance for so many in this country, Arlington National Cemetery
• It will create significant shadows on Arlington National Cemetery
• It will destroy this Nation's iconic and beloved Memorial Landscape that includes Arlington House, Arlington National Cemetery, Arlington Memorial Bridge, Memorial Avenue, and the Lincoln Memorial, by irrevocably altering and blocking those solemn, evocative, balanced, and restrained vistas

As an architectural historian, I support construction projects within this Nation's historic landscape that follow a considered approach, and do not create multiple adverse effects to historic properties including National Historic Landmarks, one this country's highest recognitions for a historic property. I hope the Commissioners will also support such preservation approaches that respect established standards on such a significant and important landscape.

Thank you for your consideration.

Laura B. Driemeyer, PhD
Architectural Historian

Name: Kitty StJohn
Date: November 4, 2026 10:49:07 am

Commissioners – your vote tomorrow on Thursday, November 5, 2026, for or against the building of the New Monumental Arch at Memorial Circle, is an important one. It is a vote that is more than the building of "the Arch"…and you know it. Vote wisely, as this is actually a decision about our Democracy. Our Democracy is at stake here!

Commissioners - have you ever visited the Memorial Circle on foot, walked all around and seen how beautiful it is?! If you haven't, I highly recommend you do. Have you ever walked around the Lincoln Memorial and looked across the Potomac River and into Arlington Cemetery?! If you haven't, I highly recommend you do. Have you even taken the Arlington Cemetery Trolley up and around to the Arlington House and looked down and across to Washington DC? If you haven't, I highly recommend you do. I think you would feel a sense of awe, peace, and pride.

Commissioners - you will be hearing from patriotic and passionate American citizens, veterans, and politicians who love this country and know that this Arch has no place here or anywhere in the United States. You spend a great deal of time considering antennas and parking garages and have delayed your vote for additional studies. I request do the same regarding the Arch – delay your vote or just vote "No."

Commissioners - your mission at NCPC states that it, "seeks 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." Are you doing that?!

Respectfully submitted,
Kitty St. John

Name: MARJORIE Isaacson
Date: November 4, 2026 10:39:06 am

I add my voices to the many citizens and highly qualified professionals in the fields of architecture, historic preservation, and history who OBJECT to the proposed Monumental Arch. I am not sure why, in the context of all the unconscionable

things this administration has done and continues to do to irreparably damage the world and our country, and the many crimes against people, the environment, and morality that have occurred, this desecration of our nation's capital strike such anger in my heart. Seeing how small and ugly his petty remodeling and decorating obsessions are and that we're allowing our treasured national symbols and the values they represent to be destroyed causes pain in my very soul.

The president's plan should be denied because he perverted the process and because it is an insult to American values. It is ugly and expensive and will no doubt be as big a boondoggle as the Reflecting Pool renovation. We have seen how this works - destruction first, you can argue about it afterwards forever but the resource is gone. Don't let a single other ill-conceived boondoggle occur. Use your authority to stop the destruction. This includes the painting of buildings, the Kennedy Center, the list goes on and on....

The proposal that describes what the Arch is supposed to represent is inconsistent with American values. The size and scale are totally inappropriate for the site and will detract from the surrounding monuments. The design is mediocre and derivative. Finally, the US cannot afford this vanity project. And the current administration has also proven it is not competent to hire people that have the appropriate expertise to carry out this folly. DO NOT ALLOW THIS PROJECT TO GO FORWARD. Thank you.

Name: Mary Beth Cox
Date: November 4, 2026 10:32:52 am

"Can you hear me now?" The people have spoken and the message is clearly a dissatisfaction with Trump and his administration. When is the government going to listen to the people? They spoke yesterday. The people do not want this arch. Trump needs to focus solely on the country, not on arches, ballrooms, golf courses and reflecting pools. He needs to be stopped! Don't do nothing. Stop him!

Name: Jyoti Patel
Date: November 4, 2026 10:09:49 am

This new "monumental" arch is a travesty and an affront to DC, Virginia, Arlington Cemetery, the people who live here, visit here, and all residents of the USA. Trump has no reasoning behind building this arch other than his own ego. He will use it as a sniper's nest, as a military installation, at the grand entry point between the Lincoln Memorial and Arlington Cemetery. At a connection point between a memorial to a great man and the great American citizens who have served and died on behalf of this country. It is ugly, it is selfish, it is boorish, and it is tacky. It serves no benefit to ANYONE other than Donald Trump. It is abhorrent it is even being considered to be built.

Name: Laura Georgi
Date: November 4, 2026 9:46:43 am

Project 8778
No to Trump's Arch. This is a stupid waste of taxpayers' money. As an atheist, I object strongly to the prominent "UNDER GOD" on the proposed monument, as a violation of the First Amendment's establishment clause. As a former undergraduate Classics major it is my firmly held belief that the arch is totally the wrong aesthetic for a democratic republic. Anyhow, what triumph does it celebrate? Losing to Iran? Destroying the very things that make us great, like our Constitution, the rule of law, our universities and scientific research enterprise, our diversity? Construction would mean years of major disruption for monument that 99% of commenters do not want. The administration has conceded that building it will be detrimental to nearby historic properties. The obvious way to "minimize visual intrusion" and "minimize … construction effects," as required, is simply not to construct this monstrosity.
Siting a pedestrian attraction in the middle of a roundabout in a major commuter thoroughfare was monumentally stupid, and now the administration wants to build it as a sniper and drone nest, which is even more monumentally stupid. Nest for sitting ducks. While the documents posted along with this agenda item do not appear to reflect it, Trump's reflecting pool speech on November 2, 2026 still referred to the arch as a "military complex." This change has profound implications for the design of the monument which at a minimum should require the administration to withdraw the proposal and start the approval process over again with the new design

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Name: John Pomeroy
Date: November 4, 2026 9:37:27 am

To: Chairman Mark Paoletta and Members of the National Capital Planning Commission
From: John Pomeroy
Date: November 4, 2026
Reference: NCPC File No. 8778
Subject: Security Problems created by the Proposed Arch at Washington Circle

On the agenda for the November 5 meeting of the National Capital Planning Commission (NCPC) is approval of the final site and building plans that have been submitted to NCPC for the new monumental arch (the "Arch") at Memorial Circle within the George Washington Memorial Parkway (the "Arch Plans"). I respectfully urge the NCPC to recommend that the Arch Plans not be approved and not be permitted to proceed until such plans have been revised and resubmitted to provide for the dual purpose of the Arch as (i) an attraction for tourists to visit, and (ii) a military installation needed for national security purposes, as claimed by Defense Secretary Pete Hegseth and Markwayne Mullin, the Homeland Security Secretary.

As reported by the New York Times, on October 28, 2026, Mr. Hegseth and Mr. Mullin both submitted sworn statements to a federal court claiming that the Arch was needed for national security purposes, and that "even though national security was never invoked in the initial proposal for the arch, the project was now needed to keep the United States safe from drone attacks." Furthermore, Mr. Hegseth told the court that "The arch is a generational national defense opportunity to mitigate these evolving threats" and that the arch's proposed height created a "significant elevation advantage." According to the New York Times, Mr. Mullin likewise told the court that the Arch was "intended to incorporate a number of features that will support national security." Both men said in their statements that no changes would be needed to the design of the Arch to convert it into a base of anti-drone operations. It is reported that Mr. Hegseth said in his statement that "[t]he implementation of the capabilities discussed in this declaration would not require any structural modifications or alterations to the existing plans for the arch."

It is simply unbelievable that the existing Arch Plans that envision a steady stream of tourists visiting the site are compatible with the use of the Arch as a secure military installation with sniper weapons and drone equipment. The following must be recognized:

1. The Arch's proposed height creates a "significant elevation advantage" for snipers – not just U.S. military snipers but a terrorist sniper who has succeeded in covertly taking a position on the upper level of the Arch. The height is a "double-edged sword." There is nothing in the Arch Plans that provide any assurance that a determined group of terrorists could not take control of the Arch and wreak havoc. The Arch must be a secure facility that cannot be occupied by foreign or domestic terrorists.

2. Moreover, last month President Trump claimed that the Arch would be used as a military depot outfitted with "large numbers of drones," snipers and ammunition. For that to occur, the Arch will need to be well guarded by U.S. security personnel 24 hours a day, 7 days a week to ensure that such weaponry does not fall into the hands of a terrorist group.

3. Even if, despite the statements made by President Trump, Mr. Hegseth and Mr. Mullin, it was decided that the Arch would not be used for military purposes, the mere presence of the Arch with its "significant elevation advantage" at the proposed location on Washington Circle creates a substantial and unacceptable security risk. The U.S. Secret Service and other armed security services will need to take control of the Arch for security purposes whenever dignitaries attend events at Arlington National Cemetery, the Lincoln Memorial, the Iwo Jima Memorial or other locations where a sniper or terrorist at the top of the Arch would have a commanding view of the event. This does not even consider the ongoing threat that the towering Arch creates to aviation activities at National Airport, not only to landing and departing aircraft in bad weather but also the threat to aircraft from an armed terrorist operating from the vantage point of the top of the Arch.

The bottom line is that no consideration has been given by the NCPC, the National Park Service, the Advisory Council on Historic Preservation or other deliberative governmental commission, council or department to the security threat created by the mere presence of the Arch with its "significant elevation advantage" at the proposed location on Washington Circle. The NCPC's consideration of the Arch Plans should be tabled until appropriate governmental bodies can assess these issues to determine the real purpose of the Arch and the modifications that need to be made to the Arch Plans to address the security problems. To blindly rush forward with the construction of the Arch in the face of these obvious but unconsidered security problems would be a monumental disservice to the United States.

Name: Margaret Love
Date: November 4, 2026 9:35:32 am

I would like to submit a very short comment on my option of the Monumental Arch project. My comment is really a question. Why is this necessary? Washington DC is a beautifully planned city with gorgeous views as it is now. The understatement of “victorious” events is what makes our city so special. It is not Paris or any other city in the world. Leave it alone. It is perfect as is.

Name: Robyn Konrad
Date: November 4, 2026 9:27:44 am

I am opposed to this arch as:
It is very expensive.
It is way too big and obstructive
There was no input from the citizens of our country.
Its architectural design is not approved through the appropriate governmental channels.
It would be a constant reminder of the self glorification of President Trump.

Name: Deborah Demaree
Date: November 4, 2026 9:00:49 am

please, this does not belong in our beautiful city. Remember, Air Florida, remember National Airport, remember the magnificent Vista from the Lee Mansion to the Lincoln Memorial, and what it means to our shared history. The gilding on the lions is already way too much! Do not approve this monument to one man

---

Name: William (Will) Sellers
Date: November 4, 2026 7:09:07 am

Dear Commissioners,

I urge you to reject the proposed New Monumental Arch at Memorial Circle and protect the historic landscape between the Lincoln Memorial and Arlington National Cemetery.

I am a lifelong Northern Virginian. I lost both of my parents in the last two years, and my father, an Army veteran, is awaiting inurnment at Arlington. This landscape is not an empty space waiting for another monument. It is a place where families remember service, sacrifice, emancipation and the people and principles that helped shape our country.

My parents strongly opposed Donald Trump, and even when my father could no longer walk, he worked to ensure his vote against Trump was counted. To have a monumental arch associated with the president placed along this route to Arlington would be painful to our family and, I believe, diminish the dignity of a place that belongs to all Americans and honors their sacrifices.

The project’s historic-preservation review identified adverse effects on 42 historic properties. Before granting final approval, please explain how those effects on the cemetery, memorial landscape and public views have been weighed, why less damaging alternatives were rejected, and how the concerns raised by the Advisory Council on Historic Preservation have been addressed. Please also consider the unresolved legal challenges concerning congressional authorization and the proposed height.

I ask you to withhold final approval and preserve the character of this historic setting. Thank you for considering my comment.

Will Sellers
Hamilton, Virginia

-----Original Message-----
From: Joyce Bissonette
Sent: Thursday, October 29, 2026 3:12 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Monumental Arch
]

I am writing to beg you to deny
permission to build a huge arch as specified by President Trump.
Not only will it destroy the view of the Arlington Cemetery it will also present a danger to National Airport flight paths, presenting a possibility of an air collision and loss of life.
I think our military is prepared to meet any attack so that we don't need a "base" in the middle of the city. An attack in that area is highly unlikely so military presence with armaments is not necessary.
This would certainly increase traffic, too, which no one wants.
The size alone, sitting all by itself, does not in any way contribute to the symmetry of that area. It would stand out like the proverbial "sore thumb".
Washington is a beautiful city. Let's not destroy it further.
Sincerely,
Joyce Bissonette

From: Kathleen Quinlivan
Sent: Thursday, October 29, 2026 8:15 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Arch.

I come from a generations long military family. My parents are buried in Arlington. Captain W. D. Quinlivan and Rita Frances Quinlivan. Outraged best describes my feelings in regards to the Trump Arch. This MUST NOT be allowed. The thought of convicted felon towering over those who bravely defended democracy/ constitution is nauseating. The arch is shameful & must be stopped. Please don't let this proceed. Thank you Kathleen Quinlivan

From:
Sent: Thursday, October 29, 2026 8:21 PM
To: Main Attendant Voice Mail <mainattendantvm@ncpc.gov>
Subject: [External] Shared Voicemail (Main Attendant)

My name is Kathleen Quinlivan, K-A-T-H-L-E-E-N, last name Q-U-I-N-L-I-V, as in Victor, A-N. I'm calling in regards to the The Trump Arch, my parents are buried in Arlington, and this cannot happen. We're not in North Korea. I think it's despicable. It's disgraceful. It's outrageous, and it must not happen. I'm adamant against this. Absolutely not. A felon standing over soldiers. Disgusting. Call back if you wish. I've emailed as well.

-----Original Message-----
From: Vicki Addley
Sent: Friday, October 30, 2026 2:32 AM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Vote No on the Proposed Arc

Please don’t let a 25-story shadow fall over Arlington.

This is a sacred place for our veterans who’ve earned the sunrise, not the shadow of an individual who has disrespected this space.

Vicki Addley

From: Lynn Alderman
Sent: Friday, October 30, 2026 9:13 AM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Trump arch

Dear sir or madam-

I'm writing to record my most heartfelt objection to the upcoming proposed Trump Arch.

If it is built, we will all have to live with the uncomfortable irony of a monument built in honor of a draft dodger, overshadowing the graves of service men and women who have given their lives for our country. This includes my father in law, a Silver star and Legion of Merit recipient who served in 3 wars and attained the rank of Colonel in the Marines.

Please, in the name of all that is sacred, do not approve this obscenity.

Submitted for your thoughtful consideration,

Lynn Alderman

From: Lunell Haught
Sent: Friday, October 30, 2026 2:48 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Stop the Arch

The landscape of our capitol is changing dramatically, and I urge you to not proceed with the 'arch' which refocuses the landscape. For what purpose? What is the arch really supposed to tell people - or demonstrate. Please do not move forward with enabling it to be constructed.

Thank you for your attention.

Lunell Haught
Spokane, WA

-----Original Message-----
From: NCPC System <info@ncpc.gov>
Sent: Saturday, October 31, 2026 2:55 PM
To: NCPC General Information <info@ncpc.gov>
Subject: NCPC Website Email

From: Wesley Edwards

Attached is a public comment for the November 5, 2026 Commission Meeting.
It relates to Agenda Item 5A - Monumental Arch, NCPC File Number 8778

Submission to the National Capital Planning Commission (NCPC)
November 5, 2026 Commission Meeting
Agenda Item 5A - Monumental Arch
NCPC File Number 8778

The Commission should reject the proposal to build a 250-foot Monumental Arch in Memorial Circle in Washington, DC, in its entirety.

The proposed Arch would be both larger and taller than the Lincoln Memorial. This fact alone should settle the question. If not, the negative effects on Arlington National Cemetery and other historic landmarks should. These have been well-documented, including by Vote Vets'geospatial study.

The Commission's statutory duty is "to **preserve** the important historical and natural features of the National Capital" (at 40 USC § 8711(a); emphasis added).

In addition, Commission staffare expected to perform in a manner that is consistent with professional principles and guidelines. For example, the AICP Code of Ethics and Professional Conduct (revised November 2021) requires planners to "[i]dentify the human and environmental consequences of alternative actions including the short and long-term costs and benefits" and [i]dentify social and cultural values which should be preserved as well as natural elements" (Part A(2)(4)).

NCPC action must serve the public interest and consider the effects of any development on the National Capital and the environment.

There is no justification for the arch and no compelling balance of interests that preserves the statutory goal of preservation.

The project is wasteful, hasty, ugly and ill-conceived. It is poorly designed and planned. The grandiosity renders the project absurd, not meaningful.

It is an eyesore waiting to happen.

The mistakes here are documented and foreseeable.

So much so that approval would embarrass this Commission and damage its reputation for years to come.

People in the future will wonder who decided to approve this arch and why they allowed the Lincoln Memorial to be overshadowed. Why did they offend the dignity of this honored ground? Why cast shadow over the honored dead at Arlington, when they were specifically warned of this result?

The Commission should reject the proposal for the Arch and abandon it altogether as harmful to the Lincoln Memorial, Arlington National Cemetery and the larger National Capital Region.

Sincerely,

Wesley Edwards
Bellingham, Washington

October 31, 2026

From: Judith Miller
Sent: Saturday, October 31, 2026 5:50 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] The proposed triumphal arch

To members of the committee to be read before or read out loud at the November 5th meeting:

When asked whom the Triumphal Arch was meant to honor, Trump said "Me." Why would you even consider approving a towering, glaringly out-of-place tower demanded by an egomaniac?

Allowing an overwhelming structure to dominate not only the Lincoln Memorial and the Arlington House but also the Arlington National Cemetery would be an affront to the extraordinary importance and sacrifice they represent. It is your duty to honor the serenity and symbolism of the site.

Thank you,
Judith Miller

From: Meg Cowan
Sent: Sunday, November 1, 2026 12:39 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] File 8778 — New Monumental Arch

Dear NCPC Staff:

Attached are two documents for inclusion in the official record for File 8778, New Monumental Arch, scheduled for consideration on November 5, 2026.

The first is my comprehensive written opposition to the proposed final site and building plan approval. The second contains my prepared three-minute oral testimony.

I am already registered to testify at the November 5 meeting.

Please confirm receipt of both attachments and their inclusion in the materials provided to the Commissioners.

Thank you for your assistance.
Meg Cowan

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It relates to Agenda Item 5A - Monumental Arch, NCPC File Number 8778

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November 5, 2026 Commission Meeting
Agenda Item 5A - Monumental Arch
NCPC File Number 8778

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It is an eyesore waiting to happen.

The mistakes here are documented and foreseeable.

So much so that approval would embarrass this Commission and damage its reputation for years to come.

People in the future will wonder who decided to approve this arch and why they allowed the Lincoln Memorial to be overshadowed. Why did they offend the dignity of this honored ground? Why cast shadow over the honored dead at Arlington, when they were specifically warned of this result?

The Commission should reject the proposal for the Arch and abandon it altogether as harmful to the Lincoln Memorial, Arlington National Cemetery and the larger National Capital Region.

Sincerely,

Wesley Edwards
Bellingham, Washington

October 31, 2026

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Sent: Saturday, October 31, 2026 5:50 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] The proposed triumphal arch

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When asked whom the Triumphal Arch was meant to honor, Trump said "Me." Why would you even consider approving a towering, glaringly out-of-place tower demanded by an egomaniac?

Allowing an overwhelming structure to dominate not only the Lincoln Memorial and the Arlington House but also the Arlington National Cemetery would be an affront to the extraordinary importance and sacrifice they represent. It is your duty to honor the serenity and symbolism of the site.

Thank you,
Judith Miller

From: Jay Miller
Sent: Monday, November 2, 2026 1:17 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Triumphal Arch approval vote/decision.

To members of the committee to be read before or read out loud at the November 5th meeting:

When asked whom the Triumphal Arch was meant to honor, Trump said "Me." A humbly ask, even if you approve of a Triumphal Arch to honor President Trump, that you do not approve its proposed location. Please, out of respect for our veterans, deny approval of the towering, glaringly out-of-place, behemoth hastily proposed by President Trump. It is out of place and disrespects the legacy and memory of those that fought for our liberties.

Allowing an overwhelming structure to dominate the Lincoln Memorial, Arlington House, Arlington National Cemetery and the historic and deliberately planned vista between them would be an affront to the extraordinary importance and sacrifice they represent. It is your duty to honor the serenity, symbolism and inspiration of the site.

Thank you,
John Miller
Palisade, Colorado

From: Trudy Smith
Sent: Monday, November 2, 2026 1:20 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] The White House

Is the People's House, not his. What he has done to the Oval Office is a disgrace. Gawdy is not a style.

Trudy

-----Original Message-----
From: Wallis Swanson
Sent: Monday, November 2, 2026 2:16 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Triumphal Arch

Commission members,

I am opposed to Trump's Triumphal Arch.

Wallis Swanson

-----Original Message-----
From: Cara Schwegler
Sent: Monday, November 2, 2026 2:21 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Oppose Triumphal Arch

To whom it may concern,
I vehemently oppose the construction of the Triumphal Arch. It will overwhelm the National Arlington Cementary and House and the Lincoln Memorial. This would be a dishonor to our country.

Sincerely,
Cara Schwegler
Kansas City, MO

From: Gary Beckman
Sent: Monday, November 2, 2026 4:24 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Proposed arch

Re: proposed triumphal arch, 11-2-2026
To: National Capital Planning Commission
This monstrosity has NOT been approved by Congress as required by LAW!! It is much too large and tall for that location; it is an aviation hazard! Also, an Environmental Assessment MUST be completed before any construction is started. Doing any ground work before this is all completed is ILLEGAL! Millions of Americans, including military veterans like myself, and VoteVets organization oppose this grandiose structure blocking the view from Arlington National Cemetery to the National Mall. The National Capital Planning Commission and Congress should not allow this construction as planned. STOP this illegitimate work until, if and when, any and all studies and approvals are completed. IF it is eventually built, at a smaller sale or different location, it should NOT have Trump's name on it anywhere, as MOST Americans disapprove of his presidency and his treatment of our military in general!

Gary Beckman
Las Vegas, NV

From: Carole Mccann
Sent: Monday, November 2, 2026 5:35 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Re: Final Agenda for NCPC's November 5, 2026 Meeting

NO ARCH NO ARCH NO ARCH NO ARCH NO ARCH NO ARCH NO ARCH NO ARCH NO ARCH

NO BALLROOM NO BALLROOM NO BALLROOM NO BALLROOM NO BALLROOM NO BALLROOM NO BALLROOM

NO TRUMP NO TRUMP NO TRUMP NO TRUMP NO TRUMP NO TRUMP NO TRUMP NO TRUMP NO TRUMP

From: NCPC System <info@ncpc.gov>
Sent: Monday, November 2, 2026 6:55 PM

Subject: NCPC Website Email

From: Nan Vantucci

SAY NO TO THE ARCH. TRRUMP IS DESTROYING OUR NATIONS CAPITAL. HE WANTS TO store DRONES AND SNIPERS??? He wants protection for himself after he incites another insurrection.

He has so many issues in this country, why is he focusing on “projects “?

-----Original Message-----
From: Kris Schaufelberger
Sent: Monday, November 2, 2026 9:34 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Trump's Triumphal Arch

Members of the committee please read out loud at the meeting November 5th, 2026.

I agree with my son-in-law:

Allowing an overwhelming structure to dominate the Lincoln Memorial, Arlington House, Arlington National Cemetery and the historic and deliberately planned vista between them would be an affront to the extraordinary importance and sacrifice they represent. It is your duty to honor the serenity, symbolism and inspiration of the site.

“When asked whom the Triumphal Arch was meant to honor, Trump said “Me”. The man who called fallen service members suckers and losers.

Arlington is not a place for a photo op. Trump turned it into one when he found a group of people visiting there. He had a huge smile for the cameras while they were all standing on graves of fallen service members.

Why is it necessary?

Arlington is a quiet place, a place to remember those who died in service to this country. The sight of the thousands of white markers. Each has the remains of a person who had a life, family and friends left behind.

A place to grieve, to honor sacrifice, to reflect.

Respectfully,

Kris Schaufelberger
Grand Junction, CO

Honoring the military sacrifices is something I grew up with. Dad was a Navy pilot who did several tours in Viet Nam. Several pilots were lost, either killed or missing. Mom accompanied the Chaplin for the notifications. School friends’ dads. Gone.

Years later my brother was killed while serving in the Navy. Decades later we all still grieve. It still hurts.

From: Sarah Moss
Sent: Tuesday, November 3, 2026 12:05 AM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Triumphant Arch

To the National Capital Planning Commission,

My name is Sarah Moss. I am a resident of Missouri, the wife of a former Marine, the daughter of a former Navy Officer and the Granddaughter of a WWII Bombardier and Purple Heart recipient. I was born in Virginia, and I am also a Registered Republican.

Today, I'm writing to object to the Triumphant Arch. Not because we don't have so many reasons to feel Triumphant as a Nation. Indeed we do! I'm not writing to object to the structure itself as much as I'm writing to object to its location.

Triumphal Arches evoke a feeling of Pomp and Circumstance. It's a National Site of Celebration. The Arlington National Cemetery is a solemn place of rest, and I pray that it stays that way for those buried there and for the families paying respect. When people visit the final resting place of the deceased, they are looking for calm and quiet - a refuge and place for reflection or prayer. A Triumphant Arch evokes energy and excitement, and I believe that the tone and purpose for each of these sites are not compatible with one another in such close proximity. I am writing to request that the plans for a Triumphant Arch are reconsidered for another location in the DC Area that would be a more appropriate site for ceremony and celebration. Even patriots who celebrate national pride in their hearts each day do not feel celebratory when visiting the gravesite of someone they have loved and lost.

Thank you for taking the time to hear my request today. Please reach out to me if there are additional steps I need to take to have my voice heard by your department,

Sincerely,
Sarah

From: Shady Migally | ME Innovations
Sent: Tuesday, November 3, 2026 1:33 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Supplement to October 25 Public Comment — New Monumental Arch, NCPC File 8778

Dear Chairman and Members of the National Capital Planning Commission,

Please accept this supplement to my October 25, 2026 public comment concerning the New Monumental Arch at Memorial Circle, NCPC File 8778, scheduled for consideration on November 5. Please read it together with my earlier submission and associate it with my Independence Arch design materials and June and July public testimony.

I support commemorating America's 250th anniversary with a distinguished American landmark that serves the public and respects the exceptional historic setting of Memorial Circle and Arlington National Cemetery.

My principal request remains a documented explanation of whether the Commission substantively evaluated my Independence Arch alternative design, what criteria it applied, and why it pursued or declined further consideration. Recent materials and developments reinforce the importance of addressing the following matters before final action.

1. Documented consideration of alternative designs
The October 26 amicus submission in *Lemmon v. Trump* raises concerns about whether alternatives were considered. I recognize that it presents the participating organizations' arguments, rather than a judicial determination or an endorsement of my proposal.

Please ask DOI/NPS to identify which Independence Arch materials, if any, were examined; whether that examination involved technical assessment; and the reasons for advancing or declining further evaluation. Acknowledgment or circulation as public comment should be distinguished from substantive consideration of the design.

My proposal's open form, distribution of structural mass, visitor-access concept, solar annual event, and educational program offer specific strategies for evaluation. If those strategies were screened out because of feasibility, project purpose, cost, site constraints, or other factors, please identify the basis in the record.

2. Seasonal shadows and consistent visual comparisons
The Washington Post's October 27 analysis raises questions about shadows on Arlington National Cemetery. Its findings warrant examination alongside the applicant's analysis.

Please obtain a reproducible seasonal shadow study identifying the model assumptions, affected areas, and duration of effects, including during visitor hours and ceremonies. Please explain any material differences between published analyses and the analysis relied upon for approval.

Please compare relevant alternative configurations using consistent terrain, orientation, dates, times, and modeling assumptions. The Independence Arch also proposes a height of 250 feet; I do not presume that openness eliminates shadow impacts. I request an objective assessment of whether its distribution of structural mass could reduce shadow coverage or duration.

This comparison should complement evaluation of historic sightlines and visual mass, particularly the Lincoln Memorial–Arlington House relationship and the cemetery's solemn setting.

3. Cemetery privacy, ceremonies, and observation facilities
Please assess how elevated observation areas could affect mourners, funeral ceremonies, and cemetery operations. Relevant considerations include viewing distances, direct sightlines, visitor activity, and the effectiveness of potential safeguards, in coordination with Arlington National Cemetery.

My alternative also includes an observation terrace and should be evaluated against the same standards. Where warranted, that evaluation should consider design adjustments, screening, viewing restrictions, and operating measures. Respect for the cemetery should be a measurable design and operational requirement.

4. Clarify military or security functions and the scope being approved
Please state whether the project submitted for approval includes, anticipates, or reserves capacity for military or national-security functions beyond ordinary visitor protection.

If such functions are contemplated, please identify how they relate to the stated project purpose and where their effects on public access, circulation, visitor operations, and historic resources have been evaluated. Please also explain whether they change the criteria used to assess alternative designs, including the Independence Arch.

If these functions fall outside the submitted scope, please identify the review process for any later material change before implementation. This request concerns publicly reviewable uses and effects, not sensitive operational details.

5. Explain the proposed height finding and establish clear implementation commitments
The staff report recommends final approval and proposes a finding that Congress's 1925 action implicitly waived the Height of Buildings Act for this project. Please explain the scope of that finding and distinguish the legal height determination from the assessment of visual, preservation, and operational effects.

Because the Independence Arch also proposes 250 feet, I claim no reduced-height advantage. Please clarify whether the proposed determination affects the criteria for evaluating alternative configurations at this location.

Please also distinguish enforceable approval conditions from recommendations for continued coordination. For transportation, cemetery access, pedestrian safety, drop-off arrangements, and architectural and aviation lighting, please identify the responsible agencies, required actions, and

matters that must be resolved before construction or public opening. Where monitoring is proposed, please identify how unacceptable impacts would trigger corrective action.



Independence Arch—previously submitted alternative concept. Images illustrate architectural form and design intent. Shadow performance, sightline effects, and operational feasibility remain subject to technical evaluation.

Requested action

Before final approval, I respectfully request that the Commission obtain the explanations needed to address these material questions and document how public comments, preservation concerns, and submitted alternatives informed its decision.

If essential information remains incomplete, please defer action sufficiently to obtain it and allow meaningful public review. Please clarify how outstanding approvals, conditions, and DOI's decision rationale will be addressed before irreversible work forecloses reasonable design responses.

I recognize that DOI is the applicant and that NCPC's review is not a design competition. I seek a fair, technically grounded assessment of the relevant strategies already submitted through the public process and a transparent explanation of their treatment.

I remain available to provide a concise technical briefing and supporting design information at no cost and without obligation to the reviewing agencies.

Please read this supplement together with my October 25 public comment and previously submitted design materials. Please provide this supplement and my referenced submissions to

all participating Commissioners and alternates. Please acknowledge receipt and confirm inclusion in the project record.

Respectfully submitted,

Referenced materials

- **NCPC staff report for November 5, 2026**

Link: (https://www.ncpc.gov/docs/actions/2026November/8778_New_Monumental_Arch_Staff_Report_Nov2026.pdf)

- **The Washington Post's October 27 shadow analysis**

Link: https://www.washingtonpost.com/investigations/interactive/2026/10/27/trumps-arch-would-cast-shadow-arlington-cemetery/

- **October 26 amicus submission in Lemmon v. Trump**

Link: https://savingplaces.org/arch-amicus-brief

Shady Migally, Int'l Assoc.AIA
Founder / CEO
ME Innovations
Architecture. Visualization. Design Intelligence

California, USA

From: Susan Smith
Sent: Tuesday, November 3, 2026 1:57 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Arch

To members of the committee to be read before or read out loud at the November 5th meeting:

When asked whom the Triumphal Arch was meant to honor, Trump said "Me." Please, out of respect for our veterans, deny approval of the towering, glaringly out-of-place behemoth demanded by one egocentric president.

Allowing an overwhelming structure to dominate the Lincoln Memorial, Arlington House, Arlington National Cemetery and the historic and deliberately planned vista between them would be an affront to the extraordinary importance and sacrifice they represent. It is your duty to honor the serenity, symbolism and inspiration of the site.

Sue Quanty Smith
Raytown, MO

From: George
Sent: Tuesday, November 3, 2026 2:43 PM
To: NCPC General Information <info@ncpc.gov>
Cc: Adria de Haume
Subject: [External] Arch de Trump

November 3, 2026

Mark Paoletta, Chairman
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, D. C. 20004

Comment submitted to *info@ncpc.gov*

Re: Commission Meeting, Open Session - November 5, 2026 at 1:00 pm (Online)
Agenda Item: United States Department of the Interior - Memorial Avenue, Washington, D.C. - New Monumental Arch

Dear Mr. Paoletta:

This letter is written in opposition to the monumental arch with the name Arch de Trump. It is a spectacle that is meant to glorify Donald Trump and is totally inappropriate.
Thank you for your consideration.
George
George C Roush, MD

From: Marsha -
Sent: Tuesday, November 3, 2026 4:12 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Arch

I am so against the building of the proposed Arch. It is gaudy, disrespectful, ugly and too expensive for our budget.
thank you
Marsha Salzberg
Bowie, MD

From: J Curnow
Sent: Tuesday, November 3, 2026 6:02 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Against the arch

To the Commission members,
We are against Trump's Triumphal Arch.
He is one President among many. Do not change Washington DC's urban planning to benefit of one single person.
Thank you,
Pat and Joly Curnow

From:
Sent: Tuesday, November 3, 2026 6:19 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Trump Arch

I am writing this note to state my opposition to the construction of the Trump Arch. This failed presidency does not warrant any Trump Memorials.

Sincerely,

Katherine Williams

From: John Miller
Sent: Tuesday, November 3, 2026 6:29 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] The proposed Triumphal Arch meeting on November 5th

Dear Commission members,

Please vote no on the proposed Triumphal Arch which is highly inappropriate. A yes vote would be desecrating hallowed grounds.

The formal axial layout and uninterrupted vista between the Lincoln Memorial and the Arlington National Cemetery was intentional to convey permanence and national unity. To protect a strict, low-profile sightline, the McMillan Commission (1901-02) **explicitly** eliminated large ornamental towers from the planning of the connecting Arlington Memorial Bridge.

We urge you to put honor for our nation's established historical monuments and respect for veterans and their sacrifices first. Casting that aside in favor of one man's insatiable desire for attention would be shameful. We're sure you know this.

Thank you,
The John E Miller, Jr. family

From: Christy Miller
Sent: Monday, November 2, 2026 1:32 PM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Proposed Triumphal Arch

To members of the committee to be read before or read out loud at the November 5th meeting:

When asked whom the Triumphal Arch was meant to honor, Trump said "Me." Please, out of respect for our veterans, deny approval of the towering, glaringly out-of-place behemoth demanded by one egocentric president.

Allowing an overwhelming structure to dominate the Lincoln Memorial, Arlington House, Arlington National Cemetery and the historic and deliberately planned vista between them would be an affront to the extraordinary importance and sacrifice they represent. It is your duty to honor the serenity, symbolism and inspiration of the site.

Sincerely,
Christina Miller
Mission Hills, KS

From: Maria Gillette
Sent: Wednesday, November 4, 2026 11:30 AM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Opposition to New Monumental Arch NCPC File No. 8778

Attached please find my comment regarding NCPC File No. 8778.

Subject: Opposition to New Monumental Arch (NCPC File No. 8778)

Dear Commissioners,

I strongly oppose the proposed New Monumental Arch.

I find the design extraordinarily ugly, unnecessary, and completely out of place in Washington's historic monumental landscape. It would not enhance this nationally significant setting. It would diminish it.

As many architects, planners, historians, and concerned citizens have warned, Washington's beauty derives from its careful balance, dignity, simplicity, and respect for historic sightlines. This proposal moves in the opposite direction. The arch's enormous scale would disrupt the character of the capital and compete with, rather than complement, the landmarks that define it.

I urge the Commission to reject this project and preserve the architectural integrity of our nation's capital.

Sincerely,

Maria Gillette
Pittsburgh, Pennsylvania

From: Antonio Vintro
Sent: Wednesday, November 4, 2026 11:50 AM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Opposition to arch proposal

4th November 2026

To the members of the Committee

I am writing to voice my strong opposition to the proposal to construct a monumental arch between the Lincoln Memorial s and Arlington cemetery .

-As you can see in the attached photo the arch will block the visual axis between the Lincoln and the Nations cemetery. Blocking this view destroys the essential symbolic relationship between the two memorials .

- The proposed arch is oversized and will overshadow physically and metaphorically the sacred space that is Arlington cemetery .

-With a 40 trillion dollar deficit shouldn’t we be saving our money

Thanks for your consideration

Cordially

Antonio. Vintro


and Lincoln memorial
Is obstructed

From: Mary Schroth
Sent: Wednesday, November 4, 2026 11:58 AM
To: NCPC General Information <info@ncpc.gov>
Subject: [External] Triumphal Arch Comments

Dear Commission Members,

I respectively request that you do not approve the current plan for the Triumphal Arch. Multiple issues and concerns remain unaddressed.

The National Park Service Assessment of Effects report acknowledged that the project would cause adverse impacts on 42 historic properties, including 6 National Historic Landmarks, by disrupting sacred viewsheds between the Lincoln Memorial, Arlington House, and Arlington National Cemetery. This has not been addressed.

Due to the lack of agreement among consulting parties and limited public comment windows, the ACHP ended the Section 106 review prematurely. This early termination resulted in limiting meaningful public participation. Concerns and issues remain unaddressed.

A project of this size and magnitude requires careful consideration and review which typically takes years to thoroughly explore.

Please delay further action on the Triumphal Arch to complete the preliminary work necessary. Please also delay your approval of this project in order to save the American people from an expensive and unwanted vanity project in Washington, DC. The mid-term election results demonstrated that Americans are not enamored of these vanity projects throughout Washington, DC.

Thank you for your consideration,
Mary Schroth

--
Mary Schroth
MONONA WI

From: Chris Brown
Sent: Wednesday, November 4, 2026
To: NCPC General Information
Subject: [External] Monumental Arch

I am testifying today in opposition to the proposed monumental Arch.

Even though the outcome is a sure thing the deck is stacked and we know the outcome.

My opposition has nothing to do with traffic or security or any of the reasons commonly mentioned in the media regarding this project. I am probably the only one today to oppose this project on purely aesthetic grounds.

The arch is truly ugly .It is gaudy and it is part of a trend that is growing

In America today.

Ugly is the new beautiful. Americans have lost all sense of what looks good.

We can see this in the growing list of things that are ugly . The list includes but is not limited to wind farms, sound walls billboards, light pole banners, street vending, solar panel farms replacing forest and of course data centers and their ugly transmission lines.

These are all examples of visual clutter. The two last additions to the mall ,the world war II memorial and the African museum are examples of such clutter. They are the wrong design in the wrong space.

It would be nice if the commission could remember one thing when it comes to the White House grounds the national Mall and Washington in general. Less is more.

The arch is simply not needed visually aesthetically or for any other reason.

I urge the commission especially those appointed by the president to do the gutsy thing and vote no on this project. Don't worry he won't fire you because that would be vindictive.

THE KURYLAS STUDIO ARCHITECTURE
www.thekurylasstudio.com

Washington, DC

31 October 2026

National Capitol Planning Commission
401 9th St. NW, Suite 500N
Washington, DC 20004

via NCPC website and e-mail: info@ncpc.gov

Dear Commissioners,

As a United States citizen, District of Columbia resident, and practicing architect, I am writing in strong opposition to the administration's **Arch**, proposed to be built in Memorial Circle in Washington, DC.

To say, as the chair of your commission has written in The Federalist, that the current administration is righting a wrong and merely fulfilling the wishes of the 1925 Congress is patently false and an insult to intelligence. Justifying a massive 250 ft. tall arch centered on Memorial Bridge as a reasonable equivalent to the two widely-spaced slender 166 ft. tall columns approved 100 years ago fails the lowest test of logic. The gall of such claims, in fact, borders on cynicism.

One might accept the building of the two original columns as fulfilling a historic intent, approved on the key condition that the columns frame in and not interfere with the view of the Lincoln Memorial from the the Lee Mansion. But the current administration's proposal of a monstrous arch completely eclipses that view.

I chose to focus on architectural and urbanistic criticism of the proposed **Arch.** There are many other justifiable reasons to object, not least of which is the lack of congressional authorization for the construction of a commemorative work on federal land.

Thank you for your consideration.

Respectfully submitted,

Lampsa Kurylas

cc Phil Mendelson, Chairman of the DC City Council and NCPC Member via pmendelson@dccouncil.gov

Muriel Bowser, Mayor of DC via muriel.bowser@dc.gov
Oye Owolewa, US Shadow Representative from DC via adeoye.owolewa@dc.gov
Paul Strauss, US Shadow Senator from DC via senator@dc.gov
Ankit Jain, US Shadow Senator from DC via ankit.jain@dc.gov

To: National Capital Planning Commission
Re: File 8778 — New Monumental Arch
Meeting: November 5, 2026
Subject: Opposition to Final Site and Building Plan Approval

Dear Members of the National Capital Planning Commission:

I am a New Hampshire resident with more than forty years of experience in tourism. That experience has taught me the importance of preserving historic landmarks and protecting places whose significance extends far beyond their appeal as tourist destinations.

I have previously expressed my strong opposition to the proposed New Monumental Arch. Having reviewed the Executive Director's recommendation for approval, I am now even more deeply troubled.

The Commission's own staff acknowledges serious damage to historic views, continued transportation concerns, and the proposed use of Arlington National Cemetery's parking facilities for arch visitors. Yet it recommends approval.

I find that recommendation baffling and profoundly disappointing.

1. Historic Preservation and the Extraordinary Scale of the Arch

Perhaps the most astonishing finding in the staff report is its acknowledgment that the proposed 250-foot arch would completely obstruct reciprocal views between the Lincoln Memorial terrace and Arlington House from higher elevations.

How can the Commission acknowledge such damage to this historic landscape and nevertheless recommend approval?

The Lincoln Memorial honors a president who helped preserve our Union. Arlington National Cemetery honors generations of Americans who served and sacrificed for their country. Arlington House occupies a prominent position overlooking that cemetery and is an integral part of the area's complex history.

These landmarks should not be visually subordinated to an enormous new presidential project.

The historic relationship among the Lincoln Memorial, Arlington Memorial Bridge, Arlington House, and Arlington National Cemetery deserves protection, not competition from a monumental spectacle.

2. Commercialization of Sacred Ground

Arlington National Cemetery is sacred ground. It is an active military cemetery where families bury loved ones, veterans honor fallen comrades, and visitors reflect upon sacrifices made in service to our country.

The proposed arch is hardly a simple commemorative structure. It includes elevators, ticketing, security screening, public restrooms, an observation deck, and extensive visitor facilities. A possible gift shop and café have also been discussed.

Think about what is being proposed: transforming the solemn ceremonial approach to Arlington National Cemetery into a destination for sightseeing, shopping, and potentially dining.

To me, that is a cheapening of our nation's history and an outrageous insult to the dignity of those buried nearby.

Even without a gift shop or café, this structure would function as a major tourist attraction, fundamentally changing the character of its surroundings.

3. The Human Cost: Noise, Crowds, and Grieving Families

My decades in tourism have taught me that large groups inevitably generate noise and activity. Tour guides address passengers, visitors gather for photographs, buses arrive and depart, and conversations and laughter are normal parts of sightseeing.

Most of this behavior is entirely innocent and unintentional. But what is acceptable at an ordinary tourist attraction can be profoundly disrespectful near a military funeral or a grieving family.

Imagine gathering to say a final goodbye to a loved one who served our country, only to have the solemnity of that moment interrupted by the noise and commotion of sightseeing crowds.

No family should have to compete with the sounds and distractions of a tourist attraction while honoring someone they have lost.

The staff report recommends monitoring construction noise near Arlington National Cemetery. But what about the noise and distractions that could continue for decades after construction ends?

The proposal also contemplates using Arlington National Cemetery's parking facilities for arch visitors and tour buses.

Why should facilities serving grieving families, veterans, and cemetery visitors be expected to accommodate an entirely separate tourist attraction?

These are human consequences, not merely operational details. The Commission must give them the consideration they deserve.

4. Unresolved Transportation, Environmental, and Legal Concerns

The staff report documents substantial transportation concerns, including 21 comments from the District Department of Transportation requesting additional information or clarification. Arlington County has also raised concerns about traffic, safety, and the adequacy of the review period.

Nevertheless, staff recommends approval while allowing further coordination to continue.

Why should final approval be granted before these issues have been satisfactorily resolved?

Questions also remain about the legal justification for the arch's extraordinary height, the effects of its proposed lighting, and the adequacy of environmental and historic-preservation reviews.

President Trump has also publicly discussed possible military or security-related uses of the structure, including drones, snipers, and ammunition. Although these functions do not appear in the published plans, the public deserves an unequivocal explanation of whether any such uses are contemplated.

The Commission should require complete transparency and convincing answers before considering final approval.

5. The Commission's Responsibility to the American People

The National Capital Planning Commission has a responsibility that extends beyond accommodating the wishes of any presidential administration.

Its duty is to protect the historic, cultural, and commemorative character of our nation's capital for present and future generations.

The staff report acknowledges serious impacts on historic views, substantial public opposition, and continuing concerns about transportation and cemetery operations. Yet it recommends approval.

This raises troubling questions about the judgment behind that recommendation and whether the public interest is receiving the independent consideration it deserves.

Our nation's achievements are already represented magnificently by the Lincoln Memorial, Arlington Memorial Bridge, Arlington House, and Arlington National Cemetery.

These places do not need a 250-foot tourist attraction competing for attention.

An anniversary celebration should not become an excuse to compromise the very history it is intended to honor.

I respectfully but emphatically urge the Commission to **reject the Executive Director's recommendation and deny final site and building plan approval for File 8778.**

Arlington National Cemetery deserves reverence, not commercialization. Our nation's history deserves preservation, not a monument to presidential vanity.

Thank you for considering my opposition.

Supporting reference: National Capital Planning Commission, *New Monumental Arch, File 8778 — Executive Director's Recommendation*, November 2026. Relevant discussion includes historic views (page 6), cemetery parking and transportation (pages 4 and 9), construction noise (pages 4 and 11), historic-preservation objections (page 13), and transportation-agency comments (pages 41–42).

https://www.ncpc.gov/docs/actions/2026November/8778_New_Monumental_Arch_Staff_Report_Nov2026.pdf

Elizabeth M. Mechem
[redacted]
Lawrence, KS 66049
[redacted]

October 21, 2026

National Capital Planning Commission
401 9th Street NW, North Lobby, Suite 500
Washington, DC 20004
info@ncpc.gov

RE: Comments on the New Monumental Arch, Applicant: US Department of the Interior, NCPC File Number: 8778

Dear Chairperson and Members of the Commission,

I am writing to you today in advance of the November 2026 meeting in which the proposed Monumental Arch will be discussed. The Monumental Arch project is disrespectful and insulting to the memories of those buried there, as well as to all veterans and their families. It appears as if no thought was put at any stage of the project to the impact on families of those buried at Arlington National Cemetery.

This is an incredibly personal issue for me. My father is a highly decorated retired career Marine. Dad served with distinction in both Korea and Vietnam. Among his numerous prestigious medals are two Purple hearts awarded during the first of his two tours in in Vietnam. I personally made the burial arrangements at Arlington for my parents. They will share the same grave upon his eventual passing, an honor that my father truly earned.

Everything about the Monumental Arch project is wrong. The arch's proposed placement, with its gauche and oversized design, will only steal focus from the simple white gravestones. The project simply does not fit the beautiful, reflective setting of the Arlington National Cemetery.

Moreover, its plan to attract tourism will ruin the private, respectful, and contemplative atmosphere provided to families of the departed. Merely the idea of families burying their loved ones having to pass under the prying eyes of tourists snapping photos is utterly abhorrent. Would you want to have a funeral with tourists taking pictures of one of life's saddest moments from the top of an ugly monument? We families of these brave veterans certainly do not.

Lastly, there is simply no need for this arch. If it is about celebrating our country's 250th anniversary, then another site should be picked where open celebrations could be held without disturbing funerals and family visits to Arlington National Cemetery. The arch is certainly not, as President Trump has claimed, about security, as no need beyond the current security level has ever been demonstrated. We certainly do not need it to act as an armory. That would just make the arch itself the target of bad actors.

I implore you; please do not let this arch be built. As an active veteran's cemetery, the cemetery must remain solemn, hallowed ground. The arch would serve no real purpose. Instead, it would take the focus from the honored dead and create a sideshow circus, destroying the current peace that is provided for reflection and remembrance.

Sincerely,

Elizabeth M. Mechem
Daughter of Anne Sweeney and Col. William T. Sweeney, USMC (Ret.)

CC: Senator Roger Marshall of Kansas
Senator Jerry Moran of Kansas
Representative Tracey Mann of Kansas' 1st District

October 27, 2026

To Relevant Congressional Committees, Executive Branch Officials, and Veteran Community Stakeholders:

Vietnam Veterans of America (VVA), the Military Order of the Purple Heart (MOPH), and the Korean War Veterans Association (KWVA) along with The Chosin Few issue this joint statement regarding the ongoing national discussions surrounding the proposed United States Triumphal Arch in Washington, D.C.

Our organizations—all non-partisan, congressionally chartered Veterans Service Organizations—do not write to endorse or oppose any specific architectural design or proposal. Rather, we write to urge our fellow veterans, community leaders, and elected officials to approach this opportunity with the unifying spirit intended by federal law, free from political bias or reflexive opposition.

The historical foundation for monumental construction at Memorial Circle sits within the *Arlington Memorial Bridge Act of 1925 (Public Law 68-542)*. Enacted over a century ago, Congress authorized a grand ceremonial gateway connecting the National Mall to Arlington National Cemetery. The core statutory and patriotic purpose of this 1925 mandate was clear: to build a lasting, unifying monument that honors the service and sacrifice of American veterans while symbolically uniting the nation.

This initiative is not about any single president, administration, or political party. It represents a long-standing national objective to celebrate American heritage, sacrifice, and civic unity.

We recognize that proposals of this scale naturally raise diverse opinions regarding design aesthetics, monument height, visual sightlines, and historical preservation:

- Substantive Design Considerations: Legitimate questions concerning height, architectural style, visual alignment with existing landmarks, or cost are constructive parts of the capital planning process. If stakeholders have concerns about the look, scale, or specific details of a proposed monument, those topics should be brought directly to the planning table for open, objective discussion.

- Rejecting Political Bias: What must be avoided is opposing or supporting a monumental opportunity simply due to political bias or partisan divisions. Denying an effort to honor

veterans and unite the country simply for the sake of opposing a specific office or sponsor does a disservice to the veteran community and the nation as a whole.

Our organizations urge all veterans and veteran advocacy groups to work together constructively. Let us focus the conversation on substance, design, and adherence to proper review processes rather than political division. Honor for our nation's service members should remain a sacred, non-partisan priority that brings Americans together.

Respectfully submitted,

Jeffrey Brodeur
National Executive Director, Korean War Veterans Association
Harold Trieber
National President, Korean War Veterans Association

Frances Figueroa-Lowe
National Commander, Military Order of the Purple Heart

Shayne Jarosz
President, The Chosin Few

Thomas Burke
National President, Vietnam Veterans of America

[redacted]
Lincoln, CA 95648
October 27, 2026

National Capitol Planning Commission
Commission Meeting on November 5, 2026

RE: Proposed Action Item File Number 8778: United States Department of the Interior, Memorial Avenue, Washington DC -New Memorial Arch

Dear Members of the National Capital Planning Commission,

I am submitting this letter to document my opposition to the proposed New Memorial Arch (a/k/a *Triumphal Arch*). The proposal is the idea of one man, Donald Trump. Whatever his station, nothing entitles him to desecrate the outstanding design of Memorial Circle which unites other iconic memorials of Washington DC, with the memorial honoring our veterans in Arlington Cemetery. No one person --- however rich or powerful--- is entitled to build an ugly barrier to the necklace of views and symbols between the greatest leaders of our nation and those who sacrificed their lives for our democracy.

Of course, the law (The Commemorative Works Act) requires that Congress must first authorize such a proposal. Not surprisingly, Mr. Trump the proponent skips the rules and claims almighty power on this (as he has with so many of his ideas). But you, as Commission members, must follow the law and be the guardians against trespass of such an important place. The obvious ugliness of this proposal and its effect on the tranquility and solemnity of Arlington Cemetery and the attendant visitors and family members is reason enough to reject this. Experts can also confirm the violation of height requirements and the need to maintain the carefully planned vistas and design of the entire area well over 100 years ago. The meaning of this place is clear to every American who respects our history and the

sacrifices made. Why is it being destroyed? For the ego of one man. A man who did not serve his country during the Vietnam War.

My father was a World War II veteran. My mother fought in the French Resistance. Both are interred at Arlington Cemetery. This is personal to me, my family and to my 7 year old grandson. To visit Arlington is to understand the tangible gifts of freedom that all who are interred there have left for us. So many, many families consider Arlington as a place of honor for their departed and as a place of tranquility for the loved ones who come to pay their respects. And Arlington serves as a reminder to never forget the Wars, the horrors, that these departed experienced. It is our duty to protect and maintain this beautiful tribute to our History and to the more than 400,000 veterans who are interred there.

Please reject the proposal in its entirety as nothing less than total destruction of everything that Arlington National Cemetery and Memorial Circle has represented for over 150 years.

Sincerely,

Marguerite Schellentrager
Email: [redacted]

The Arch Proposal

I implore you Commissioners to NOT APPROVE the proposed ARCH. Bogus reasons given for why it's needed. It's another example of Trump and his ego needs and has nothing to do with National Security. Please do the right thing and uphold the beauty and the landscape of Washington, D.C., the people's city.

Mary Kinnick

Retired university professor

October 22, 2026

The Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President,

I write as a disabled veteran of the United States Navy and Director of Veterans Affairs for Conservative Action Now to express my wholehearted support for the construction of the Triumphal Arch at Memorial Circle, near Arlington National Cemetery. To me, this arch is not simply a proposed monument. It is a symbol of my family's legacy and of the generations who have defended the American Republic.

Our family has served this nation in uniform since its founding. My father served in United States Marine Corps reconnaissance, and my uncles served in the Marine Corps as well. My grandfather served in the United States Air Force, my great-grandfather served during World War II, and generations before them answered the call. I continued that tradition in the United States Navy. Today my niece carries it forward as a Navy sailor.

For my family, the 250 years of American independence we commemorate are our story, too. Those years were secured not only by celebrated leaders and historic victories, but by ordinary American families who answered their country's call, generation after generation. The duty to serve and the willingness to sacrifice are woven into our history.

As a disabled veteran, I know that service does not always end when the uniform comes off. Some sacrifices remain with us throughout our lives. The freedom we enjoy has a human cost, borne by service members and the families who stand beside them.

That is why the Triumphal Arch holds such profound meaning. At the approach to Arlington National Cemetery, it would offer a visible reminder of the courage and dedication that have sustained America from its founding through its 250th anniversary.

From Valley Forge to Iwo Jima, from the Pacific to the deserts and mountains where Americans have served in our own lifetimes, each generation inherited a nation worth defending and left that responsibility to the next. Some service members came home; others remain forever in the places where our nation remembers its fallen.

I believe the arch should be built with the dignity its setting requires. The sanctity of Arlington National Cemetery must remain paramount. Construction and public access should respect military funerals, grieving families, and the solemnity of those sacred grounds.

I would welcome a lasting tribute at the arch or its surrounding plaza to the men and women of our Armed Forces, and to the families whose sacrifices too often go unseen. Such a tribute would help visitors understand that American independence is not merely a date in history. It is a living responsibility.

I respect the right of fellow veterans to express differing opinions about the project. But no individual lawsuit or group speaks for all who have worn our nation's uniform. My family and I fully support this monument and what it would mean to families whose service spans generations.

Mr. President, the Triumphal Arch represents our story, too. It honors those who came before us, those serving today, and those who will carry the oath into the future. Its meaning to my family is both personal and profound: 250 years of service, sacrifice, and love of country.

Thank you for thinking of families like ours. Thank you for recognizing that America's 250th anniversary belongs also to the generations who helped build, defend, and preserve this great nation. We fully support the Triumphal Arch and hope it will stand for centuries as a testament to that enduring legacy.

God bless you, Mr. President, our veterans and military families, and the United States of America.

Respectfully,



Kimberly Taiko Moyers

Director of Veterans Affairs, Conservative Action Now
Veterans for Christ Initiative
2 Step Act Board Member
Sea Cadets Member
United States Navy Disabled Veteran

Good afternoon, Commissioners.

I represent Third Act DMV, the combined DC, MD, and VA—area chapter of Third Act, a national movement of retirees and elders working to protect democracy and confront the all too real climate crisis.

Here in the DMV, we've given that mission a distinctly local expression, emphasizing the preservation, conservation, and stewardship of public lands, historic landscapes, and cultural institutions.

We regard these places as a shared democratic inheritance, entrusted to us by previous generations and held in trust for those who follow.

Our guiding principle is simple:

Public places belong to the public. Temporary officeholders are their trustees, not their owners.

That brings us here today. But I want to speak about something larger than this arch.

There are two competing understandings of democracy at work in America today.

One recognizes that ours is a pluralistic society. That disagreement is legitimate, even necessary. That institutions like this Commission exist to give the public a voice in decisions affecting our common inheritance.

This understanding rests on deliberation, accountability, separation of powers, and the rule of law.

The other begins with a leader who claims to speak for the people. His electoral victory becomes an all-purpose mandate. His desires become public priorities. His appointed functionaries find—or invent—the authority and justifications to make those desires a reality.

In the first, institutions constrain power. In the second, they become instruments of power.

And that distinction brings us to Memorial Circle.

The President wants a triumphal arch. An enormous, 250-foot monument along one of the most historically significant ceremonial corridors in America.

This is not an empty parcel awaiting improvement. It is a carefully composed landscape connecting the Lincoln Memorial, Arlington Memorial Bridge, and Arlington National Cemetery.

A landscape that honors sacrifice, remembers the dead, and gives physical expression to our national history.

It belongs to the American people.

Consider what has happened during this review.

The National Park Service identified adverse effects on historic properties and nationally significant landscapes. Consulting parties raised substantial objections. The Advisory Council on Historic Preservation terminated consultation toward an agreement resolving those adverse effects.

Yet the project continued toward final approval.

We've watched an elaborate machinery of government mobilized around a monument whose necessity has never been convincingly established.

Architectural renderings. Transportation studies. Environmental findings. Lighting plans. Agency consultations.

All devoted to answering one question:

How do we build what the President wants?

But there's another question. One that should have come first, through genuine public deliberation:

Should we build it at all?

That is the difference between stewardship and servitude.

Commissioners, institutional integrity isn't measured merely by whether the paperwork is complete.

It's measured by the independence of your judgment. By your willingness to weigh evidence that challenges the desired outcome. By whether public participation can genuinely affect a decision.

And by your willingness to say no.

I'm a veteran, long-time military spouse, and recent retiree from federal public service. I understand how political pressures accumulate, and how easily bureaucratic processes can become exercises in justifying decisions already made.

That is precisely why institutional independence matters.

We are not asking you to defy democracy. We are asking you to practice it.

An electoral victory does not confer ownership of the nation's cultural inheritance, nor relieve public officials of their independent obligations.

Perhaps this Commission will approve the arch today. Perhaps the outcome has already been decided.

But the public record should reflect that citizens came forward, defended this landscape, and insisted that government answer to something greater than one man's ambition.

The question before you is not simply what kind of monument will stand at Memorial Circle.

It is what kind of institution will stand behind the decision.

On behalf of Third Act DMV, I ask you to reject the proposal.

Be stewards of the public trust, not custodians of a presidential wish.

Thank you.

New Monumental Arch

NCPC File Number: 8778

Comments for NCPC Meeting November 5, 2026

Good morning,

I am writing as a United States Navy Veteran from Colorado for the third time to again implore the members of the National Capital Planning Commission to **disapprove** the request for the siting and construction of this proposed arch. Compelling arguments in opposition to this project have been respectfully made by any number of qualified and credentialed architectural professionals and historical preservation authorities. I have very little to add that you might find persuasive in completing your deliberations but invite you to consider the content of these two websites relating to the history and purpose of the Arlington Memorial Bridge and to a photographic history of Arlington National Cemetery, particularly the 1864 photo of Union soldiers standing on the Arlington House hillside. The proposed arch can only be viewed as an unwelcome and unnecessary intrusion and desecration of the “spacious skies” between the Lincoln Memorial and the hallowed ground of Arlington National Cemetery, open space long intended by those with vision and aesthetic subtlety to serve as a testament to the unity of our nation and its higher principles and purposes. Think of the opportunity you have before you at this meeting to be able to later tell your grandchildren and all future generations of Americans that you summoned you better angels and voted to preserve an important symbolic corridor that in itself speaks to honoring all that is good about our nation in its 250th year.

Thank you.

https://www.nps.gov/gwmp/planyourvisit/memorialave.htm?ftag=YHF4eb9d17

https://www.nationalreview.com/photos/arlington-national-cemetery-history/

Clifford A. Nancarrow

Comments to the National Capital Planning Commission
Submitted by John Ayers
November 3, 2026
Re: New Monumental Arch, NCPC File Number 8778

As discussed below, as a threshold matter the three presidential appointees to the National Capital Planning Commission do not appear to possess the city or regional planning experience Congress expressly requires for service on the Commission.[1]

Undeterred by such formalities, the commissioners plow ahead, and in an October 5, 2026 article in *The Federalist*, Chairman Mark Paoletta presented his case for approving the proposed triumphal arch and announced his intention to vote in its favor, well before the Commission's November 5 final review and vote.[2]

Chairman Paoletta cited, almost in passing, the military's determination that this tourist attractions would also serve as a necessary platform for advanced defense capabilities. We now know a bit more about those proposed capabilities, and what we have learned raises fundamental questions about the plans before this Commission and whether they have received adequate review by the Chairman or the Commission.

The Chairman's article also raises at least two additional concerns over his advocacy in favor of the arch. First, in describing the authority granted by the 1925 Arlington Memorial Bridge Act[3] (the "1925 Act"), he seems to selectively quote Congress's authorization to make design changes, omitting the words "said bridge" and "without increasing the total cost of the project." Those omissions matter. They obscure important qualifications in the statutory language and make the authority Congress granted appear broader and less constrained than the text itself establishes.

Second, Chairman Paoletta characterized the absence of a monument at Memorial Circle as a century-long disgrace to America's veterans. That accusation is difficult to reconcile with the historical purpose of the original design or with the extraordinary commemorative landscape that exists today, including Arlington Memorial Bridge and Arlington National Cemetery.

These issues—military functions, statutory authority, the historical justification offered for the arch and the ongoing litigation—warrant careful, independent examination and thus a delay in the vote. The Commission should not treat its Chairman's publicly announced support as a substitute for that responsibility.

[1] 40 U.S.C. § 8711(b)(1)(B) (requiring appointed citizen members to have "experience in city or regional planning").
[2] Mark Paoletta, "Trump's Triumphal Arch Completes a Longstanding National Aspiration," *The Federalist* (Oct. 5, 2026), https://thefederalist.com/2026/10/05/trumps-triumphal-arch-completes-a-longstanding-national-aspiration/.
[3] Act of Feb. 24, 1925, ch. 303, § 1, 43 Stat. 974.

A Military Facility That Apparently Requires No Changes to the Plans?

In sworn declarations filed in federal court, Secretaries Pete Hegseth and Markwayne Mullin describe a structure intended to accommodate military command-and-control facilities, protected operational spaces, counter-drone systems, secure communications, and storage for drones, equipment, and ammunition.[4]

These are not incidental security features of a public monument. They describe a permanent military facility within a structure also intended to accommodate thousands of tourists.

Yet both secretaries declare under penalty of perjury that implementation of the proposed capabilities would not require structural modifications or alterations to the existing plans for the arch and that the security features will be fully integrated into its design.[5]

If these military functions are already accommodated within the existing design, they are not apparent in the publicly available plans submitted to the Commission. In fact, at an October 30 hearing before Judge Tanya Chutkan, Justice Department counsel was unable to provide any details about the national-security component at all.[6] How, then, can the Commission independently determine that the proposed design adequately accommodates them?

The issue is not whether sensitive military details must be publicly disclosed. It is whether the Commission has independently reviewed sufficient information to understand the actual project it is being asked to approve.

Chairman Paoletta announced his support before these declarations were filed. The other commissioners should not be asked to approve the project without resolving the substantial questions they raise.

If the Commission cannot determine whether the existing plans adequately accommodate these military functions and whether their consequences have been reviewed, it should defer its vote.

Veterans Deserve Better Than This Argument

A troubling anchor of Chairman Paoletta's argument to approve in *The Federalist* is his use of veterans to give his preferred monument a moral urgency that the historical record does not support.

He declares: "It is a national embarrassment that policy makers have neglected for more than 100 years to build a congressionally authorized monument on this circle to honor our nation and its veterans."[7] He later calls the absence of a monument at Memorial Circle "a disgrace to our country and especially to our veterans."[8]

That is a remarkable characterization, particularly given what stands on either side of Memorial Circle. Congress's Arlington Memorial Bridge was built as a monumental expression of national reconciliation and remembrance of military sacrifice.[9] It leads directly to Arlington National Cemetery, where

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[4] Declaration of Pete Hegseth, *Lemmon v. Trump*, No. 1:26-cv-00544-TSC, ECF No. 74-9 (D.D.C. Oct. 28, 2026); Declaration of Markwayne Mullin, *Lemmon*, ECF No. 74-8 (D.D.C. Oct. 27, 2026).
[5] Hegseth Declaration ¶ 15; Mullin Declaration ¶ 16.
[6] CBS News, "Judge skeptical of administration's defense of Trump's proposed arch**"** (Oct. 30, 2026), https://www.cbsnews.com/news/trump-arch-arguments-judge-hearing/.
[7] Paoletta, *supra* note 2.
[8] *Id.*
[9] *See* National Park Service, "Arlington Memorial Bridge Rehabilitation," https://www.nps.gov/places/arlington-memorial-bridge.htm (ensure the bridge continues to serve as a memorial to the sacrifices of our nation's veterans.

generations of Americans who served their country are honored and laid to rest. And much of the opposition to the proposed arch arises precisely from concern about protecting the historic setting and solemnity of these places—honoring and protecting veterans.

To characterize this landscape as a century-long disgrace to veterans because one element of the original design was never constructed is an extraordinary distortion of what is actually there.

The Chairman's own historical account makes the accusation still harder to justify. He acknowledges that the two columns originally proposed for Columbia Island were designed to symbolize reconciliation between North and South following the Civil War. The broader bridge project unquestionably honored military sacrifice, but these particular columns represented the reunification of a divided nation.[10]

How does the failure to build two columns symbolizing national reconciliation become a century of disrespect toward America's veterans? The Chairman never establishes that connection.

Veterans deserve to be honored. They also deserve better than to be used as a rhetorical justification for a monument whose legality and historical foundation remain in serious dispute.

The irony becomes even more disturbing when the Chairman highlights the proposed observation deck, promising visitors "unparalleled views into Arlington National Cemetery."[11]

Arlington is not a tourist attraction to be admired from above. It is an active national cemetery where families bury their loved ones and mourn their loss. The cemetery's own visitor etiquette instructs visitors to maintain their distance from funeral services and move away from areas of active mourning.[12]

Yet the Chairman promotes an elevated public viewing platform overlooking this sacred ground as a selling point for a monument supposedly intended to honor those who served. That strikes me as profoundly undignified.

Congress Authorized a Project, Not a Blank Check

The distinction between what Congress originally authorized and what the Chairman now claims that authorization permits is central to this debate. The 1925 Act unquestionably authorized an ambitious project, including features on Columbia Island (although I have not found any actual reference to the Circle as the "centerpiece" of the project as the Chairman writes). But whether that authorization extends to the fundamentally different structure now proposed is another matter entirely.

And just as the Chairman stretches the historical record to transform two unbuilt reconciliation columns into a century of disrespect toward veterans, he takes similar liberties with the statute itself. Here, however, the problem is even more straightforward. He writes:

> "Finally, in 1925, Congress enacted the recommendation of the Arlington Memorial Bridge Commission and tasked the executive branch with constructing the project, including the 'monumental treatment' of Columbia Island, subject to design changes that in the executive branch's 'discretion may be found to be necessary or advisable.'"[13]

Here's what Congress actually said:

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[10] Paoletta, *supra* note 2.
[11] *Id.*
[12] *See* Arlington National Cemetery, "Visitor Tips and Cemetery Etiquette," https://www.arlingtoncemetery.mil/Visit/Visitor-Tips.
[13] Paoletta, *supra* note 2.

> "Provided, That said commission may make such changes in design and location of said bridge without increasing the total cost of the project as in its discretion may be found to be necessary or advisable."[14]

Notice what disappeared in Paoletta's version: "said bridge" and "without increasing the total cost of the project."

The Chairman's phrasing is no accident of emphasis. By placing the "monumental treatment" of Columbia Island immediately before his abbreviated quotation of Congress's modification authority, he makes it appear that Congress expressly granted sweeping discretion to redesign the island's monuments. But Congress did not say that. It authorized changes to "said bridge," subject to an express cost limitation.

Whether "said bridge" encompasses the broader undertaking is a legitimate question of statutory interpretation. But that only makes the Chairman's omission more troubling. He presents a contested interpretation as though it were the plain language of Congress.

Congress's Words Matter Here, Too

One final statutory question concerns the Commission itself—and why Congress required its members to have planning experience in the first place.

Under 40 U.S.C. § 8711(b)(1)(B), Congress expressly requires the Commission's five appointed citizen members, including all three presidential appointees, to possess experience in city or regional planning.[15]

Yet NCPC's Web site offers that there is a "Full biography forthcoming" for the 3 presidential appointees—though Levenbach and Blair have been have been on the Commission for over a year. Their publicly known professional backgrounds appear to be principally in law, government, and public policy—not city or regional planning.

The statute does not demand a planning degree or professional license. It does, however, require planning experience. Surely the public is entitled to know what that experience is.

And this is not merely a question of credentials. It goes directly to the judgment being exercised here.

The Chairman repeatedly treats the absence of a monument at Memorial Circle as an embarrassment, as though an unbuilt element of a century-old design necessarily represents a failure that must now be corrected.

Yet the Chairman himself invokes the 1902 McMillan Plan, declaring that it "still governs DC's planning." The McMillan Plan remains a foundational influence, but the federal Comprehensive Plan provides the operative planning framework for NCPC today.[16] And as I have already documented in the record, the proposed arch conflicts with as many as twelve provisions of that Plan.

Both the McMillan planning tradition and the current Comprehensive Plan recognize the importance of open spaces, monumental vistas, and protected sightlines. The original designs for Columbia Island were debated and reconsidered over time.

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[14] The 1925 Act.
[15] 40 U.S.C. § 8711(b)(1)(B).
[16] *See* National Capital Planning Commission, *Comprehensive Plan for the National Capital: Federal Elements*, https://www.ncpc.gov/plans/compplan/ (describing the federal planning framework); *see also* Paoletta, *supra* note 2 (discussing the McMillan Plan).

A commissioner with meaningful planning experience might ask a different question: Is the open Memorial Circle actually a problem that needs to be solved?

Conclusion

Chairman Paoletta's defense of the proposed arch is troubling enough on its own terms. But it is even more troubling in the context of the serious legal challenges now surrounding this project that include the Height of Buildings Act, the Commemorative Works Act, the National Environmental Policy Act, the National Historic Preservation Act, and other federal laws. These are not minor procedural objections. They go to whether the federal government has the legal authority to build this monument, whether it has complied with the laws governing construction in the nation's capital, and whether it has adequately considered the consequences for one of America's most historically significant landscapes.

The public deserves a Commission that applies Congress's laws, respects the historical record, and exercises its own judgment—not one that simply finds reasons to approve the President's preferred monument.

I urge the Commission to reject the proposal. At a minimum, it should defer any vote until it has sufficient information to evaluate the proposed military functions and the plans it is being asked to approve.

NEW MONUMENTAL ARCH
TESTIMONY OF CHRISTOPHER J. CONNELL

NATIONAL CAPITAL PLANNING COMMISSION
NOVEMBER 5, 2026 MEETING

PROPOSED ACTION ITEM: New Monumental Arch

NCPC File Number: 8778
Agency: United States Department of the Interior
Installation: George Washington Memorial Parkway

TESTIMONY TEXT

My name is Christopher Connell. I am speaking today as an individual and as a citizen of the District of Columbia.

A lot has been said recently about the height of the Monumental Arch project, but I would like to speak about what lies below the surface. The National Park Service's revised Environmental Assessment report of October 2026, states that the 4-to-5-month foundation-building phase of the project would involve below ground excavation of approximately 75 vertical feet to reach bedrock. This depth would be necessary to establish a foundational infrastructure anchored on bedrock to support the arch (Exhibits A & B, attached). To put this into perspective, seventy-five feet to reach bedrock is nearly three times as deep as the Führerbunker in Berlin during World War II and the same depth as the caissons submerged below the East River to support the Manhattan anchorage of the Brooklyn Bridge in the late 19th century. The NPS report also states that approximately 1,400 truckloads of subsoil would be hauled off to Maryland or Virginia during the excavation phase. We can better understand the enormity of the proposed project if we multiply 1,400 truckloads by an average hauling capacity of 420 cubic feet of soil per truckload. This gives us a product of 588,000 (or nearly a half million) cubic feet of excavated subsoil and alluvial deposits. I respectfully request that the Commission take additional time to study the details of the excavation phase of the project. If careful attention isn't paid to such issues as shifting subsoil layers and ground water flow and, if no-bid contracting and "botched" work are the outcome as we have seen elsewhere, the arch will prove structurally unsound. Like the Leaning Tower of Pisa, the proposed arch would rest on unstable substrata, and its legacy would, ironically, see it "leaning to the left" (or to the right)—depending on one's perspective.

Before there was a Memorial Circle, before there was a Columbia Island, and before there was an Arlington National Cemetery, this area was part of a larger plantation and estate owned by the Custis-Lee families. In the 1950s, Murray H. Nelligan, the National Park Service historian for the Custis-Lee Mansion, authored a handbook, *Custis-Lee Mansion: The Robert E. Lee Memorial* which included a map depicting Arlington Estate as it had existed in 1860 (Exhibit C). This map

identified the location of slave cabins and a slave cemetery situated not far from today's axis that runs through Memorial Circle between Arlington House and the Lincoln Memorial. When we consider the history of this site, and when we read the wording "Liberty and Justice for All" that is proposed for the Virginia-facing side of the arch, it doesn't take much to be deeply offended by this insensitive and ill-conceived motif.

From both a geotechnical and historical standpoint, I respectfully request that the Commission re-evaluate the scope and intention of the proposed monumental arch and not approve the site and building plans.

EXHIBIT A: CONSTRUCTION SHOWING WEST TERMINUS OF MEMORIAL BRIDGE AND COLUMBIA ISLAND IN FOREGROUND (note: the height differential between the bridge decking and the spoil basin on Columbia Island)

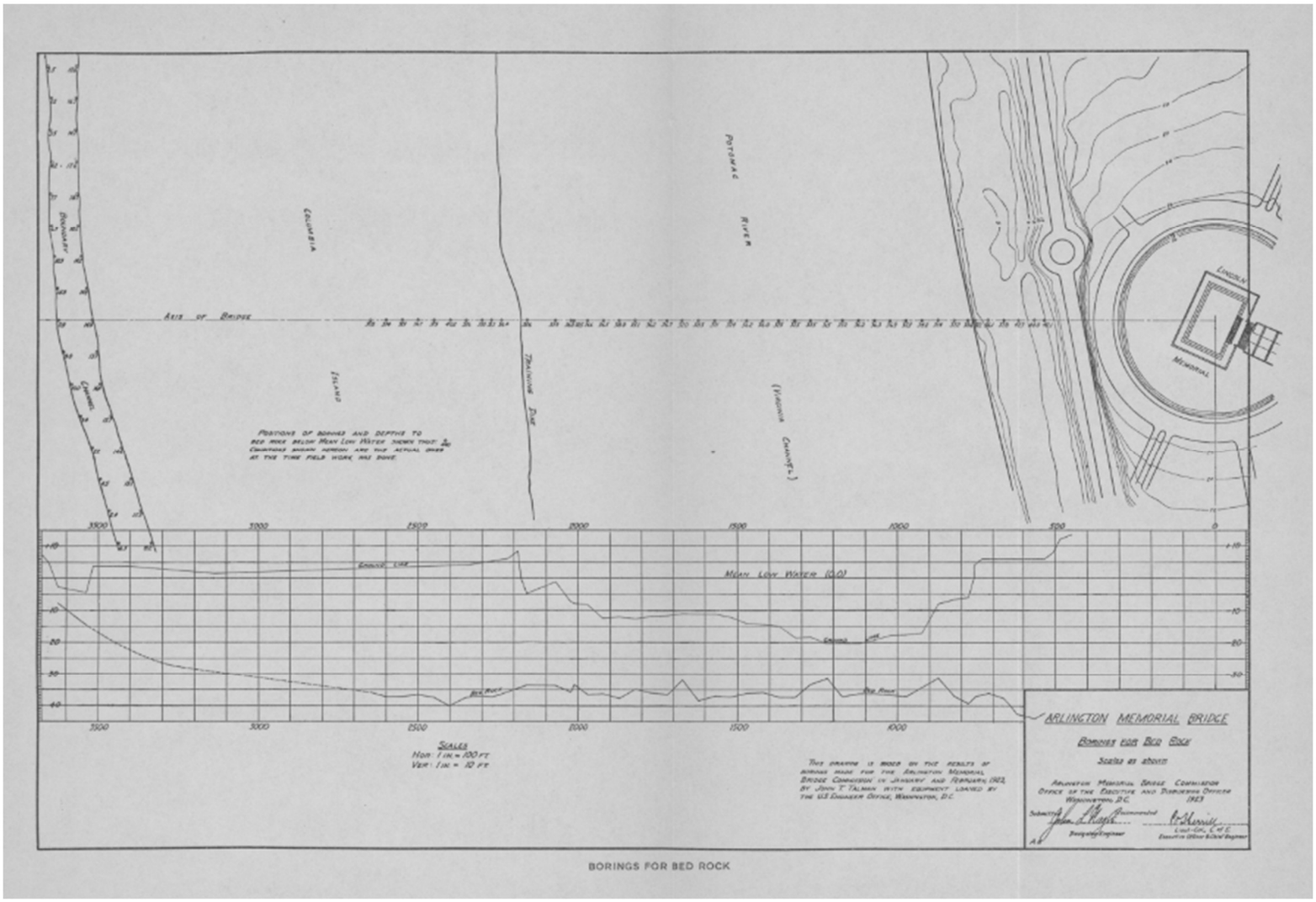


Citation:

War Department. Army Air Forces. Arlington Memorial Bridge across Potomac River – at Washington, D.C. , [1930], photograph, U.S. National Archives and Records Administration, NAID 68152166 / Local ID: 18-AA-140-10. https://catalog.archives.gov/id/68152166

This aerial photograph taken from the Virginia side of the Potomac as Arlington Memorial Bridge was nearing completion clearly illustrates the height differential between the depression of the spoil basin on Columbia Island and the bridge decking and bridge abutment immediately beyond it. ***This discrepancy was solved when several tons of sand and gravel "sucked from [the] river" (as reported by The Washington Post in October 1930) were added to the existing spoil basin, raising the level of Columbia Island an additional thirty feet to meet the Virginia terminus of the soon-to-be completed bridge.***

EXHIBIT B: BORINGS FOR BED ROCK (1924 AMBC REPORT TO THE US SENATE)



Citation:

United States Congress. Senate, et al. Arlington Memorial Bridge. Message from the President of the United States, transmitting ... the report of the Arlington Memorial Bridge Commission ... April 21 calendar day, . -- Read, referred to the Committee on Commerce, and ordered to be printed. April 24 calendar day, April 25, 1924. -- The Committee on Commerce discharged, and referred to the Committee on Public Buildings and Grounds and ordered to be printed, with illustrations. [Washington, D.C.: U.S. Government Printing Office, 1924]. https://www.loc.gov/item/2024878157

A substantial and detailed communication submitted to the United States Senate in 1924 by the Arlington Memorial Bridge Commission under the chairmanship of President Calvin Coolidge, this report explained (in part) how Columbia Island would integrate with the overall bridge project and what the high/low cost estimates would be to achieve this. Concluding the report are various engineering drawings of bridge elevations, bridge arch and deck construction, including a "borings to bed rock" technical drawing that follows the bridge axis from the Washington side to the center of Columbia Island. ***It is important to note that these boring data indicate, at their most extreme, a depth of 40.2 feet (below mean low water) before bedrock is reached near the center of Columbia Island [p. 57].***

EXHIBIT C: ARLINGTON HOUSE, 1860

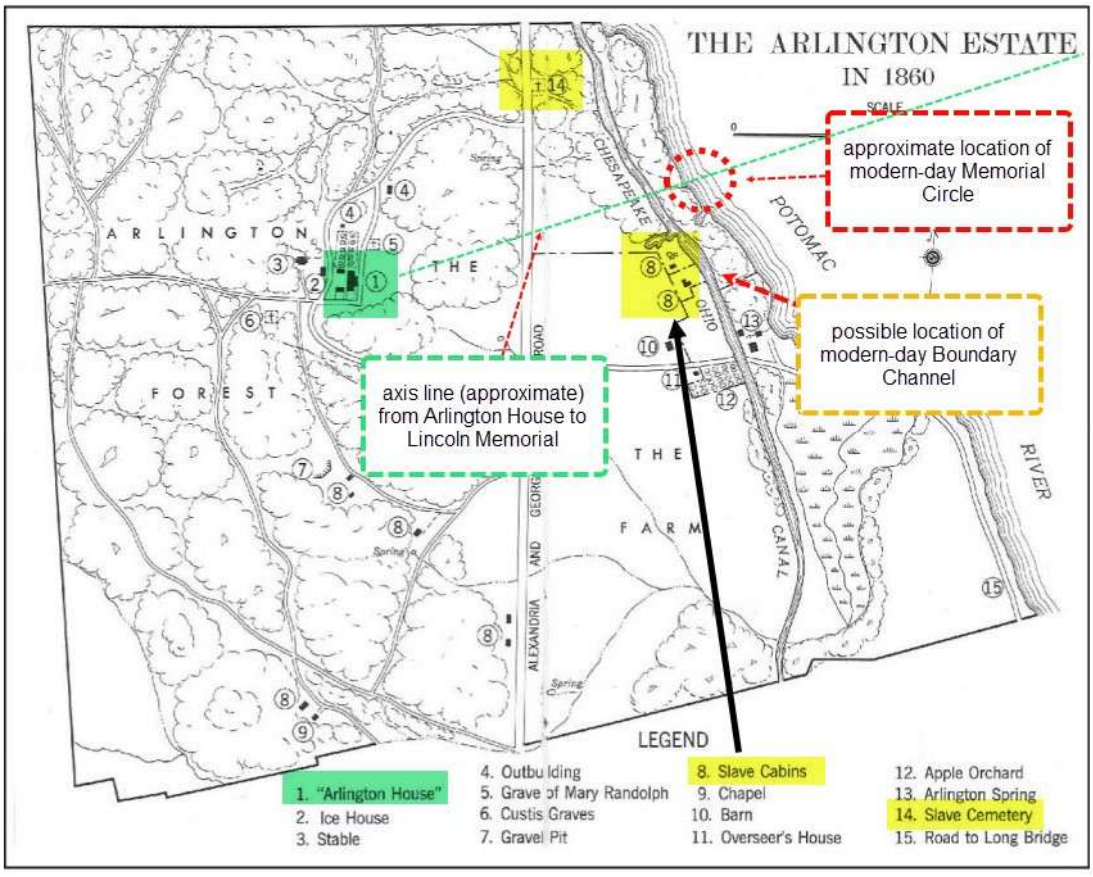


Figure 12 Composite Map of Antebellum Arlington Estate (Nelligan 1962)

Citation:

Nelligan, Murray H. Custis-Lee Mansion: The Robert E. Lee Memorial (Historical Handbook Series no. 6) U.S. Department of the Interior. National Park Service, Washington, D.C., 1950, 1962 (revised). https://www.gutenberg.org/files/50570/old/50570-h/50570-h.htm

An informative historical survey of Arlington House and of the Custis and Lee families, this handbook also includes a map depicting Arlington Estate as it existed in 1860. ***This map identifies the location of slave cabins and a slave cemetery that had existed near the Potomac River and situated on both sides of the modern-day axis running through Memorial Circle between Arlington House and the Lincoln Memorial (p. 22).***

DarkSky International - DC Chapter
700 7th St. SW Ste 805
Washington DC 20024
www.darkskydc.org

November 3, 2026

Secretary
National Capital Planning Commission
401 9th St. NW
Washington DC 20004

Re: Commission Meeting of November 5, 2026

I will submit oral testimony regarding the proposed new Arch on behalf of the DarkSky DC Board of Directors. My written testimony is attached.

Jim Dougherty

Chair, DarkSky DC

202-607-7093

jimdougherty@aol.com

Comments on Proposed Triumphal Arch

("New Monumental Arch" / NCPC File Number: 8778)

Submitted by
Jim Dougherty, Chair
DC Chapter, DarkSky International

November 4, 2026

SUMMARY OUTLINE:

I - BACKGROUND ON DARKSKY DC

II - PROBLEMS WITH THE PROPOSED LIGHTING REGIME

A, Under FAA Rules, the Arch Should Have Red "Obstruction Lights"
B. The Proposed Lighting Regime is Excessively Bright
C. The FAA's Bizarre Mandate to Require Placement of a "Non-Standard Eternal Flame" on the Arch.
D. The Proposed Light Color of 4000° K CCT is Unpleasant to the Eye, Will Increase Light Pollution, and Clearly Violates NCPC Regulations.
E. Upward-pointing Floodlights That Are Situated under the Landing Path to DCA Runway 19 Will Pose an Extreme Hazard to Air Navigation

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I BACKGROUND ON DARKSKY DC

DarkSky International (formerly known as the International Dark-Sky Association, or IDA) is a global non-profit organization founded in 1988. Its mission is to restore natural nighttime environments, combat light pollution, and protect the heritage of starry night skies for humans and wildlife.

DarkSky DC is a chapter of DarkSky International. Since 2009 our leadership has been a voice for controlling needless nighttime lighting. Earlier this year our team of advocates urged the NCPC to tone down the proposed uplighting of Union Station.

II. PROBLEMS WITH THE PROPOSED LIGHTING REGIME

A, The Arch Should be Equipped with Red "Obstruction Lights"

The Federal Aviation Administration ("FAA") has promulgated rules governing the placement and marking of obstructions that are erected along the landing paths to airfields. FAA AC 70/7640 1N (2026) (114 pp) ("FAA 7640"). Chapter 4 of these regulations prescribe "Lighting Standards."

Significantly, FAA 7640 contains this language regarding "obstruction lights" in urban areas:

Sec. 4.3.8. Obstruction Lights in Urban Areas. (p. 4-2)

*When a structure is located in an urban area where there are numerous other white lights (e.g., streetlights), red obstruction lights with appropriate marking or a medium-intensity **dual system** is recommended. (emphasis added)*

In other words, all potential hazards to aviation in urban areas should have either (1) red lights or (2) BOTH red lights and external white spotlighting. Musco's lighting plan doesn't comply. It proposes no red lights.

But it wasn't always so. On its initial review of the proposed lighting regime FAA demanded red lights for the arch. But, mysteriously, that requirement was waived after confidential interagency negotiations. (Reuters, Sept. 23). No reason was offered.

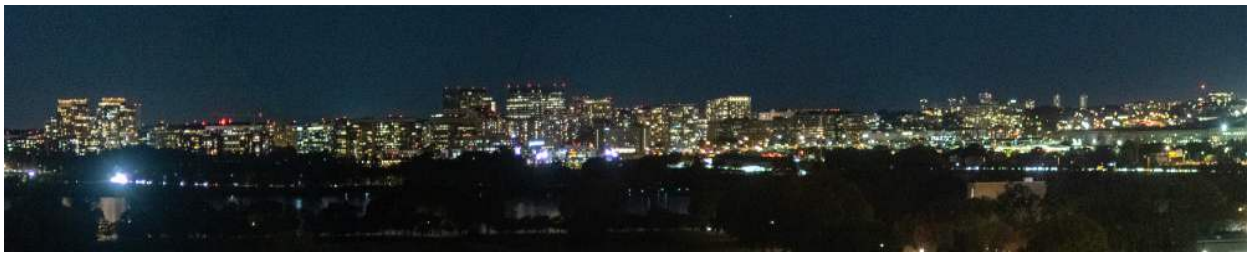
Red obstruction lights are normally required on structures near DCA, including the Washington Monument and the Capitol Power Plant. This has been mandated for scores of buildings, on both sides of the river, for a couple of miles north and south.



Here's an image of the skyline east of DCA, at the SWDC Wharf

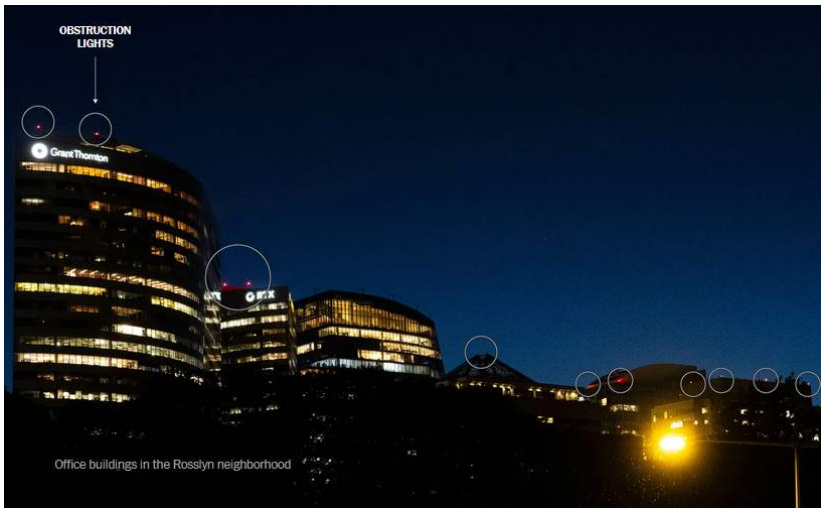
Here are two halves of an ultra-wide image of the skyline west of DCA, in Crystal City.





And here's an image of Rosslyn at night:

Scores of roofline red lights are visible in these images.

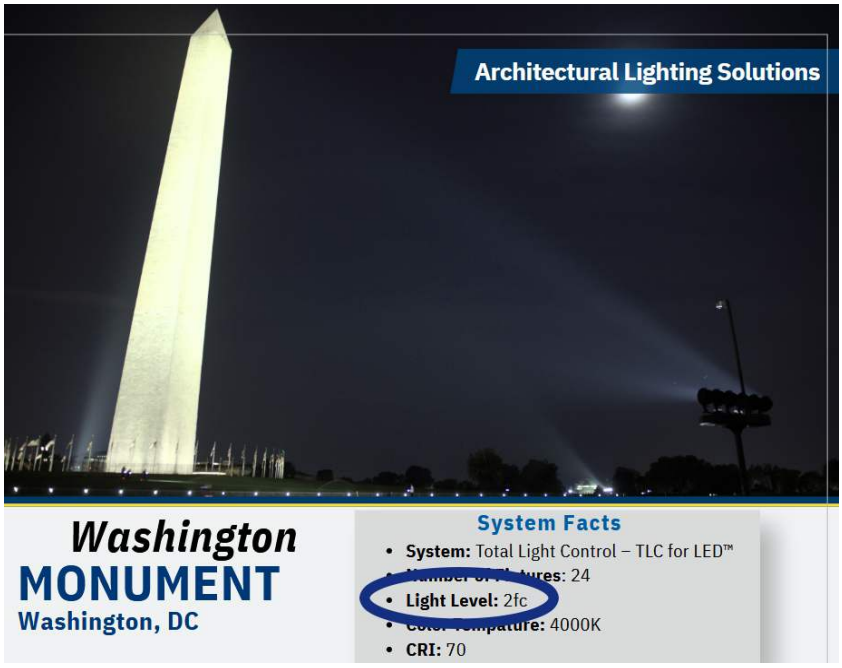


New York Times image

B. The Proposed Lighting Regime is Excessively Bright

We are unaware of regulatory limits on the amount of light that can be hurled at monuments – and, inevitably, into the night sky. We suggest this one: **none should be brighter than the Washington Monument**. The pre-eminent monument in Washington is – and will remain – the Washington Monument. New monuments should not be sized – or illuminated – to rival the Monument. But that appears to be what President Trump is attempting to do.

According to the lighting contractor that has been selected by the National Park Service ("NPS") – Musco Lighting – the average brightness of the Washington Monument is 2 foot-candles ("fc") The level of lighting allows it to be seen from Shenandoah National Park - 75 miles away.



However, NPS proposes to throw 7.5 times as much light on the granite faces of the arch – 15 fc!



Images and language copied from Musco's lighting plan cannot be cited as the document has no page numbers.

And the statuary **will receive even more light**, in part because of the planned placement of 116 floodlights on top of the granite/concrete structure – all pointed up into the night sky. This will yield thirty-eight foot-candles (19 times the brightness of the Washington Monument) on a gold-plated (highly reflective) surface 250 feet up in the air! This is far in excess of the regulatory prescription of 15 fc. One must suspect that a call for "More Light!" was received from a higher authority.



C. The FAA's Bizarre Mandate to Require Placement of a "Non-Standard Eternal Flame" on the Arch

The FAA's Determination of No Hazard to Air Navigation (8 pp.) was issued Sept. 18, 2026. Inexplicably it requires the arch to have a "non-standard" eternal flame on top to enhance visibility to "airmen." Condition #7, p. 7.:

7. CONDITIONS
The proposed structure should be appropriately marked/lighted with a non-standard eternal flame *and continuously floodlighted by searchlight projectors installed at three or more equidistant points around the base of the structure. The searchlight projectors should provide an average illumination of at least 15 foot-candles (161.46 lux) over the top one-third of the structure, in accordance with FAA AC 70/7460-1N, Paragraph 4.5, to make it more conspicuous to airmen.*

This makes little sense. We contend that, given:

- the vast amounts of light that will be showered on this vast (two-acre) canvas of high-albedo granite;
- the banks of lights that will be roof-mounted and concentrated upward on the golden statue,
- the array of six large banks of floodlights on the ground,
- all in all a total of more that 200 upward-pointing floodlights producing over 3 million lumens (by our calculations)

... it is preposterous and/or arbitrary and capricious to think that placing a propane torch in the hand of the golden-winged-warrior-goddess statue will enhance the visibility of this colossus to "airmen."



The propane torch is not what will make the arch visible to "airmen."

D. The Proposed Light Color of 4000° K CCT is Unpleasant to the Eye, Will Increase Light Pollution, and Clearly Violates NCPC Regulations.

The Lighting Plan proposes that **all** of the lights that will be installed at the site will be of the "cool white" variety - expressed by cognoscenti as "4000° K CCT". (Color Corrected Temperature). This is objectionable on several grounds.

First, "cool white" lighting is seen by experts as crisper or harsher than "soft white" or "warm white" lighting. Public opinion surveys have shown that most people prefer "soft white" or "warm white" lighting.

Second, cool-white light creates more light pollution. When cooler, bluish light reaches the atmosphere it has a greater tendency to scatter and create a glare zone in the region. Its can also create a haze that reduces visibility.

For these and other reasons the NCPC has banned the use of "cool white" lighting in and around the Monumental Core. Its "Monumental Core Streetscape Project" finalized in 2025, https://www.ncpc.gov/plans/streetscape, prescribes acceptable and unacceptable lighting colors. The pertinent table – attached as Appendix 1 – is found on p. 25 of the NCPC guidance. It identifies acceptable colors for various applications. **Not one category of lighting is permitted to be any "cooler" than 3000° K CCT.** Many applications are required to use warmer light. Thus the NCPC cannot approve the current proposal without violating its own regulations.

E. Upward-pointing Floodlights That Are Situated under the Landing Path to Runway 19 Will Pose an Extreme Hazard to Air Navigation

Nothing in the materials distributed by NPS or the FAA address the crucial question of whether the hundreds of upward-pointing floodlights will impair the visibility of pilots attempting to land to the south on Runways 15 or 19 – despite the fact that these powerful floodlights are located directly along the landing path, depicted below:



Image - New York Times

Certainly no one has forgotten the tragic air disaster – involving the same runway (#19) – that took place earlier this year and cost 67 people their lives. It has been reported that one of the causes of the crash was the plethora of distracting light sources around the airport. https://www.washingtonpost.com/investigations/interactive/2025/dca-crash-cause-lights/

The FAA issued a "Determination of No Hazard to Air Navigation" on Sept. 28 of this year. Though the draft "DNHAN" issued back in July had recognized the arch as a hazard and called for installation of warning lights, after "interagency review" all of that bothersome language was removed from; the final DNHAN states:

3. EFFECT ON AERONAUTICAL OPERATIONS

*Aeronautical study disclosed that the proposal would have **no effects** on existing or proposed arrival, departure, or en route instrument flight rule (IFR) operations, minimum flight altitudes, minimum vectoring altitudes (MVA), aeronautical procedures, or aeronautical facilities at DCA... (emphasis added).*

Undoubtedly this was well-received at the White House.

The last three pages of the DNHAN are devoted to public comments and the FAA's responses thereto.

One of those comments -- and the FAA's response -- is pertinent here:

Comment 4: *A comment stated that required Part 77 obstruction lighting combined with planned decorative monument lighting will increase pilot night-vision impairment, hinder the ability to identify other aircraft at night, and cause severe glare during arrivals and departures.*

FAA Response*: The obstruction lighting recommended for the proposed structure will be Night Vision Goggle (NVG) compatible. Additionally, glint and glare evaluations fall outside the regulatory scope of 14 CFR Part 77 for off-airport aeronautical studies...*

In other words, according to the FAA, evaluating "glint and glare" that penetrates into cockpits of aircraft approaching DCA "is not our job." Unstated was whether they expect commercial pilots to use night vision goggles when landing on Runway 19 at night.

Respectfully submitted,

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DarkSky
DC CHAPTER

Appendix 1 - NCPC Lighting Guidance

Guidance Summary Chart:

Component Type & Tier	Color Temperature Guidance	Brightness/Dimness Guidance	Other Guidance
Structures: Civic Buildings, Memorials, Monuments, and Bridges			
Tier 1	Soft white (3,000K)	Most visually prominent in the nighttime sky.	
Tier 2	Soft white (3,000K)	More visually prominent than Tier 3 and the surrounding urban context.	
Tier 3	Soft white (3,000K)	More visually prominent than surrounding urban context.	
Landscapes: Parks and Open Spaces			
Tier 1	Soft white (3,000K) for nationally significant open space and urban settings. Warm white (2,700K) for natural/waterfront and residential settings and pedestrian walkways.	Brighter lighting in urban settings. Dimmer lighting in nationally significant open space, natural/waterfront, and residential settings.	Protect the primary nighttime vistas including the dim lighting on the Mall within the U.S. Capitol Building's western viewshed.
Tier 2	Soft white (3,000K) for nationally significant open space and urban settings. Warm white (2,700K) for natural/waterfront and residential settings and pedestrian walkways.	Brighter lighting in urban settings. Dimmer lighting in nationally significant open space, natural/waterfront, and residential settings.	
Tier 3	Soft white (3,000K) for nationally significant open space and urban settings. Warm white (2,700K) for natural/waterfront and residential settings and pedestrian walkways.	Brighter lighting in urban settings. Dimmer lighting in nationally significant open space, natural/waterfront, and residential settings.	
Streetscapes: Avenues and Streets			
Radiating & Edging	Soft white (3,000K) for nationally significant open space and urban settings. Warm white (2,700K) for natural/waterfront and residential settings and pedestrian walkways.	Brightness and dimness dependent on views to important illuminated structures. Generally, brighter lighting in urban settings. Dimmer lighting in nationally significant open space, natural/waterfront, and residential settings. (Streetlight dimming achievable through coordination with DDOT)	See the Pennsylvania Avenue Lighting Plan (1977) for more details on this street's unique lighting design.
Connecting & Traversing	Soft white (3,000K) for nationally significant open space and urban settings. Warm white (2,700K) for natural/waterfront and residential settings and pedestrian walkways.	Brightness and dimness dependent on views to important illuminated structures. Generally, brighter lighting in urban settings. Dimmer lighting in nationally significant open space, natural/waterfront, and residential settings. (Streetlight dimming achievable through coordination with DDOT)	
Local	Determined by DDOT (2,700K to 3,000K)	Determined by DDOT	Determined by DDOT

November 4, 2026

Mr. Mark Paoletta, Chairman
National Capital Planning Commission
401 9th Street, NW
Suite 500N
Washington, D.C. 20004

Dear Commission Chairman Paoletta and Commissioners,

Thank you for the opportunity to comment on the proposed Triumphal Arch that would be built at the western terminus of Memorial Bridge to honor the nation's 250th anniversary. The Cultural Landscape Foundation (TCLF), a national, Washington, D.C.-based education and advocacy organization, first reiterates its comments of May 28, 2026 (attached), and July 8, 2026 (attached), stating that at 250-feet-tall, the arch would be a significant addition to the Monumental Core, which stretches from the U.S. Capitol Grounds to Arlington National Cemetery, and includes the White House Grounds and the National Mall. Memorial Bridge physically and symbolically links the north and south to heal the division of the Civil War. And this connection is reinforced via a purposefully protected and unimpeded visual relationship between Arlington House, the onetime home of Confederate General Robert E. Lee, and the Lincoln Memorial. The Arch would interrupt and sever these iconic visual and spatial relationships that are integral to the visionary City Beautiful-era McMillan Plan, which is a cornerstone of the Monumental Core's design intent and its inherent symbolism. In addition, the Arch would also disrupt the visual relationship between the Lincoln Memorial and the John F. Kennedy Gravesite and Eternal Flame. These nationally significant and symbolic relationships have been carefully stewarded by the National Capital Planning Commission (NCPC) for decades.

Proponents of the Arch are ignoring some legal requirements while employing fallacious and/or selective interpretations of others:

1. First, Congressional authorization is required for this project. 40 USC §8106 is very clear: "A building or structure shall not be erected on any reservation, park, or public grounds of the Federal Government in the District of Columbia **without express authority of Congress**." [emphasis added]
2. In addition, in the Commemorative Works Act, Congress barred the construction of any "commemorative work" in the District—including any "monument . . . or other structure . . . designed to perpetuate . . . the memory of an individual, group, event, or other significant element of American history"—**unless Congress has "specifically authorized" it.** [emphasis added]
3. The Arch would violate the Height of Buildings Act, which this body has abided by for many, many decades. Passed in 1899 and amended in 1910, the Act contains **no exemption for federal buildings**.
4. The Arch is not consistent with the plan submitted by the Arlington Memorial Bridge Commission in 1924 that included a proposal for two columns In Memorial Circle. The 1924 report stated the columns' intent was **"framing in but not interfering with the view"** between the Lincoln Memorial and Arlington House. [emphasis added]
5. In 1916, the same year he wrote the Organic Act creating the National Park Service and outlining the agency's important mission, the landscape architect and city planner Frederick

> Law Olmsted, Jr., a member of the McMillan Commission, the Commission of Fine Arts, and an earlier version of this Commission, warned against proposed large ornamental towers on Arlington Memorial Bridge saying: "**Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part."** [emphasis added]

For these reasons and the profoundly deleterious effects the Arch would have on the Monumental Core, and dozens of National Register-designated properties in the District of Columbia and Virginia, TCLF urges the Commissioners to reject this proposal.

Feel free to contact me with any questions and thank you for your consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

May 28, 2026

Mr. William Scharf, Chairman
National Capital Planning Commission
401 9th Street, NW
Suite 500N
Washington DC 20004

Dear Commission Chairman Scharf and Commissioners,

Thank you for the opportunity to comment on the proposed Triumphal Arch that would be built at the western terminus of Memorial Bridge. At 250-feet-tall, the arch would be a significant addition to the Monumental Core, which stretches from the U.S. Capitol Grounds to Arlington National Cemetery, and includes the White House Grounds and the National Mall. The proposed arch interrupts and severs key visual and spatial relationships that are integral to the Monumental Core's design intent and its inherent symbolism, discussed below, and which have been stewarded by NCPC for more than a century.

There are two critical points in Washington, D.C.'s landscape legacy—Pierre L'Enfant's plan of 1791 and the McMillan Plan of 1902. The latter was devised by a distinguished group that included the landscape architect Frederick Law Olmsted, Jr.

Olmsted, Jr.'s impact on the development of the capital city is exceptional. Along with the McMillan Commission, he was a member of the first Commission of Fine Arts (CFA) in 1910, and served until 1918; he was the principal author of the Organic Act that created the National Park Service (which manages much of the city's Monumental Core), a member of the first National Capital Park Commission (1924-26) and National Capital Parks and Planning Commission (1926-32), both predecessors to the current commission, and the principal designer of the White House Grounds plan of 1935, which has guided work on those grounds for more than 90 years. The CFA's website notes: "Olmsted Jr.'s work of many decades on the National Mall created a unified spatial composition from a sequence of disconnected landscapes."

According to the National Park Service's Cultural Landscape Report (CLR) of 1999 for the Lincoln Memorial and West Potomac Park, "Olmsted exercised a unique influence over the development of the Lincoln Memorial grounds, serving as arbiter of design decisions regarding all aspects of the treatment of the landscape." In addition, "Layout, spatial relationships, planting, and site features were often conceived, shaped, and reviewed by the landscape architect member of the commission prior to approval by the full commission."

Visually connecting the Lincoln Memorial to Arlington National Cemetery is Memorial Bridge described in the National Register of Historic Places nomination (1980) as "Washington's most beautiful bridge"; it was designed by William Mitchell Kendall, a partner at the architectural firm McKim, Mead & White. Earlier bridge designs include one from 1886 by Paul Pelz that "featured Renaissance Revival Towers and articulated steel arches crossing the Potomac River," and competition winning design from 1899 by Edward Pearce Casey that included "Triumphal Arches on piers [that] emphasized an imperial architectural image" as noted in *Civic Art: A Centennial History of the U.S. Commission of Fine Arts* (p. 107).

Indeed, as part of the campaign to get this present proposed arch built, its proponents have circulated images of those aforementioned Memorial Bridge designs and others from the late nineteenth and early twentieth century that include arches and other tall vertical elements.

All of those proposals were ultimately rejected. To argue that these proposals prove an arch was predestined is fallacious, at best. Similarly, the suggestion that L'Enfant called for the construction of one or more arches in the city is based on an inventive interpretation of a letter between L'Enfant and Thomas Jefferson in 1791. L'Enfant said no such thing.

According to the National Park Service the present Memorial Bridge was "Symbolically … designed to show the strength of a united nation by joining a memorial on the north side of the Potomac River (the Lincoln Memorial) with one on the south (Arlington House, the Robert E. Lee Memorial)." The architect envisioned an elaborate sculptural program … including seated figures of the first four American presidents on the D.C. side and reclining statues of oceans and river gods on Columbia Island. The bridge itself was to have forty allegorical statues." That entire sculptural program was eliminated by the CFA, as some statuary and pylons were seen as too tall in relation to the memorial.

The Lincoln Memorial is a hinge point (on a bent axis) visually connecting the Washington Monument and the Reflecting Pool to the east, and Arlington House. The Historic American Engineering Record report of 1988 about Arlington Memorial Bridge by historian Elizabeth Nolin noted: "As the final link in the chain of monuments which start at the Capitol building, the Arlington Memorial Bridge connects the Mall in Washington, D.C. with Arlington National Cemetery in Virginia. Designed to connect, both physically and symbolically, the North and the South, this bridge, as designed in the Neoclassical style, complements the other monumental buildings in Washington such as the White House, the Lincoln Memorial, and the Jefferson Memorial."

Some 110 years ago, Olmsted, Jr. wrote a letter to Secretary of War Newton D. Baker concerning the proposed Memorial Bridge design; his sage observations are apt today: **"The existing bridge design was the result of a competition held about 1899, before the Lincoln Memorial was even dreamed of…** [emphasis added]

"The bridge plans were carefully studied by members of the so-called Park Commission of 1900, of which I am the sole survivor. As a result of that study certain recommendations about them were made an essential part of our general plan. Among other things we said:

"Such modifications would call for the removal of the central ornamental towers, which would conflict with the proposed Lincoln Memorial."

"**These towers are the most conspicuous feature of the design and are so large and elaborate as to compete with the Lincoln Memorial** not only in an artistic sense but in point of cost. To eliminate them from the design would involve its complete restudy as an artistic problem. **Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part."** [emphasis added]

We hope that the words and precedent of a founding NCPC commissioner who greatly influenced the overall design of the city offers this commission valuable insight and worthwhile guidance.

Feel free to contact me with any questions and thank you for your consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

July 8, 2026

Mr. William Scharf, Chairman
National Capital Planning Commission
401 9th Street, NW
Suite 500N
Washington DC 20004

Dear Commission Chairman Scharf and Commissioners,

Thank you for the opportunity to comment on the proposed Triumphal Arch that would be built at the western terminus of Memorial Bridge. The Cultural Landscape Foundation (TCLF), a national, Washington, D.C.-based education and advocacy organization, first reiterates its comments of May 28, 2026, stating that at 250-feet-tall, the arch would be a significant addition to the Monumental Core, which stretches from the U.S. Capitol Grounds to Arlington National Cemetery, and includes the White House Grounds and the National Mall. Memorial Bridge physically and symbolically links the north and south to heal the division of the Civil War. And this connection is reinforced via an unimpeded view from Arlington House, the onetime home of Confederate General Robert E. Lee, to the Lincoln Memorial. The arch would interrupt and sever these key visual and spatial relationships that are integral to the Monumental Core's design intent and its inherent symbolism, and which have been stewarded by NCPC for more than a century.

TCLF requests that National Capital Planning Commission (NCPC) defer any decisions on "Preliminary Site and Building Plans" until after the conclusion of a full review under Section 106 of the National Historic Preservation Act, the completion of which is a prerequisite for NCPC final approval. The Section 106 process, which could affect the site selection and design of the arch, should have preceded presentation of the project to NCPC and the U.S. Commission of Fine Arts (CFA). Unfortunately, the latter has already voted to give the project final design approval despite not having seen or reviewed final designs. TCLF requests NCPC not take a similarly precipitous and procedurally dubious step at this preliminary stage.

TCLF is fully in agreement with David Maloney, the District of Columbia State Historic Preservation Officer (DC SHPO), who wrote in a letter to the National Park Service (NPS) on June 26, 2026, that the proposal would "severely damage an exceptional cultural landscape and one of the most important symbolic places in the nation." That letter, submitted as part to the project's Section 106 review, also stated: "The unprecedented nature of this proposal and the extraordinary level of public interest clearly require full consideration of alternatives that could avoid, minimize, or mitigate adverse effects. The potential for such effects on National Historic Landmarks elevates the requirement for planning to minimize harm. Exclusion of alternatives that may involve site relocation or diminution of the structure is not consistent with these requirements."

Since the documented adverse effects cannot be appropriately avoided, minimized or mitigated in the current location, the project should be rejected. The DC SHPO notes there are other locations in Washington, D.C. for such a project, which could be brought before NCPC for review.

Lastly, TCLF goes back the comments of landscape architect Frederick Law Olmsted, Jr. whose work of many decades as a member of the McMillan Commission of 1901, the CFA, and two predecessor iterations of NCPC, created a unified spatial composition on the National Mall from a sequence of

disconnected landscapes. In 1916, Olmsted said that the arch shaped centrally located ornamental towers of a proposed Memorial Bridge design should be eliminated. The design pre-dated the McMillan Plan of 1902 and the idea of a Lincoln Memorial and that **"**not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part."

Feel free to contact me with any questions and thank you for your consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

The Committee of 100
on the Federal City

945 G Street, N.W., Washington, D.C. 20001 ◆ www.committeeof100.net ◆ info@committeeof100.net

November 4, 2026

Statement of Judy Chesser, Chair, Committee of 100 on the Federal City
Before the National Capital Planning Commission

Regarding the Request for Approval of Final Site and Building Plans, *New Monumental Arch, Memorial Avenue, Washington, DC* (Meeting of November 5, 2026, NCPC File Number: 8778)

The Committee of 100 on the Federal City (Committee of 100) again writes in strong opposition to the proposal to construct a large, monumental arch in Memorial Circle, at the west end of Arlington Memorial Bridge.

Applicable Laws

We re-iterate our previous comments, submitted on June 3, 2026, and July 6, 2026, that the proposal is fundamentally and substantively inconsistent with the planning principles established by the Senate Park Commission's 1902 plan (the "McMillan Plan") and subsequent federal planning and design guidance. Simply put, the project's enormous size, its towering scale, and its garish and vainglorious design are incompatible with the nationally significant—even sacred—cultural landscape defined by the Lincoln Memorial, the Arlington Memorial Bridge, and Arlington National Cemetery, not to mention scores of other historic sites and landscapes across the Nation's Capital and neighboring Virginia.

We also reiterate our view that the NCPC should refuse to approve a proposal for an installation requiring congressional approval under the Commemorative Works Act (CWA), 40 U.S.C. §§ 8901–8909 and the Height of Buildings Act, Pub. L. No. 61-196, 36 Stat. 452, but which has not been so authorized. In past practice, the NCPC has declined to approve proposals that were inconsistent with federal mandates and should decline to do so in this case.

In particular, we condemn in the strongest possible terms the bootstrapping rationale developed by the federal agency proponents of this project that congressional authorization of a completely different project more than a century ago—a project intended for a completely different purpose and one eventually rejected by the Arlington Memorial Bridge Commission - constitutes congressional approval of this project for purposes of the CWA. To be frank, the Administration's insistence that the 1925 conceptual approval of two slender columns should now be read as congressional approval of a massive arch towering over the iconic monumental core of the Nation's Capital is an insult to the intelligence of the American people.

The Public Does Not Support the Proposed Arch

Besides the lack of Congressional approval, it is clear that the public does not support the proposed Arch. There are at least 3 lawsuits opposing the proposed Arch, involving the Commonwealth of Virginia, the District of Columbia and the County of Arlington. According to NCPC itself, 93% of roughly 11,000 comments previously submitted to NCPC very strongly opposed the Arch. In June,

the National Park Service reported that 100,936 comments were submitted over a 10-day period from June 5 - 15, 2026. See Appendix B, Triumphal Arch Project Public Comment Summary Report. PEPCparkplanning.nps.gov.

The 1925 law does not grant Congressional approval in 2026.

A different law passed over one hundred years ago, 1925, does not empower President Trump to build his arch today as the Administration argues without explicit Congressional approval.

In 1924, the Arlington Memorial Bridge Commission sent their report to Congress, offering several options and draft legislation. The relevant part of the report was that the Commission suggested "two stately columns" that would be "surmounted by statues."

In 1925, Congress passed the legislation but left the ultimate design of what would be built at the end of Arlington Bridge for the Bridge Commission to decide.

Temporarily, the Commission kept an option for 2 columns of 166 feet in height, 15 feet in diameter and 300 feet apart, saying that the design would "not interfere" with the view from the Lincoln Memorial to the Lee Mansion (Arlington House).

The historical record also suggests not that the Commission wasn't able to complete the columns, but that officials chose not to construct the columns.

The columns were removed by the Commission from the design. No less a renowned figure than Frederick Law Olmsted rejected a similar proposal as a "slap in the face to the Lincoln Memorial."

Commission of Fine Arts (CFA) Member Adolph A. Weinman, a famed American sculptor, stated that it would be "better not to erect the columns," saying they were "too massive" and "like two smokestacks" in conflict with Bridge, Lincoln Memorial and Washington Monument.

There were concerns, shared by President Herbert Hoover, that the columns would interfere with flights to a nearby airport roughly where the Pentagon is now.

Facing these objections, the commission decided in December 1931 not to build the columns, which had evolved to 181 feet tall from the previous 166-foot number. Thus, the Bridge Commission specifically rejected the columns.

Viewshed

In the 1924 report, the Arlington Memorial Bridge Commission described the two columns, later rejected, as "framing in but not interfering with the view of the Lincoln Memorial from the direction of the Lee Mansion."

The Arlington Memorial Bridge Commission explicitly did not want anything to interrupt the sightline from Robert E. Lee's home in Arlington National Cemetery looking east across the bridge toward the Lincoln Memorial. Views between the two were integral to the whole composition, designed to evoke reconciliation between the North and the South.

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One objection to the arch is that it would interfere with this view, as renderings by Mr. Trump's architect acknowledged:



View from Arlington House with arch/ Rendering via Harris Design
The symbolic sightline to the Lincoln Memorial …would be interrupted by the arch. Harrison Design

Differences between columns and Arch

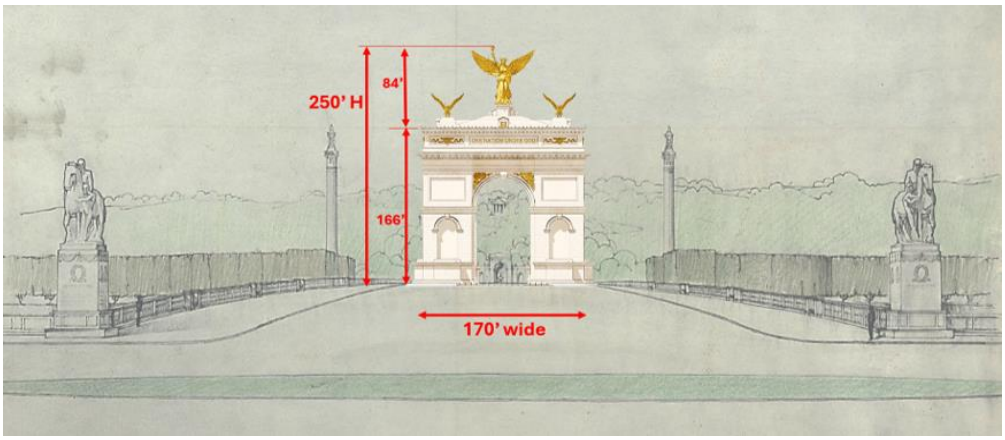
"The idea that this proposal is somehow justified by what happened in the 1920s and '30s with the proposals for the bridge — not to be blunt about it, but it just doesn't pass the laugh test," David Maloney, the District of Columbia's state historic preservation officer, told the National Park Service in a recorded meeting in September.

None of the original objections to the columns is remedied by the Arch proposal, In addition, the Administration trying to base their strategy on history creates incongruities.

Location: Because they are intent on citing the 1925 law as authorization, the Administration has said they will not look at any alternatives regarding location. The National Park Service has concluded that the Arch would interfere with over 40 nearby monuments and landmarks. But the Administration has insisted that the Arch can't be located anywhere else —presumably because moving it would break the thin reed connecting the Arch to the rejected columns of one hundred years ago.

Design: The Administration cites the previously rejected columns as authorization but has declined to consider designs actually resembling the original columns. The view of the Triumphal Arch superimposed makes clear that the current proposal not only would not "complete" the 1924 design, but it is also plainly incompatible with it.

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(Illustrations: *McKim, Mead & White, Architectural Records, PR42*, Department of Prints, Photographs, and Architectural Collections, NY Historical Society; Annotations by David Scott Parker, David Scott Parker Architects.)

What does "conclusion" mean?

As to the equestrian statues, the Arts of War and Peace, now gilded, were gifts of the Italian government and installed in 1951. An official history of the bridge said that the dedication of those statues, "brought work on the Memorial Bridge to a conclusion." (emphasis added)

The sightline between the Lincoln Memorial and Arlington House, previously the home of Robert E. Lee, was meant to commemorate the reunification of the North and South. The unity that peace brought after years of horrific civil war. The Triumphal Arch is to celebrate a victory. It is not entirely clear what victory, but this is antithetical to the solemn meaning of the place.

And now, the Administration has said that the Arch will serve the military, the president added last month, as a platform for snipers.

The plan to complete building of the Arch within 2 to 3 years on a schedule of 20 hours per day inherently means that construction will be taking place during veteran burials at Arlington cemetery.

An additional, but no less serious a concern is that the 300 foot plus construction cranes pose a risk to flights landing at National Airport.

Timeline of Changing Legal Basis Cited for Arch

Last fall, the President said he wanted a monument like those in other western nations but bigger. At that point he did not mention the 1924 Arlington Memorial Bridge Commission report or its plans for a pair of 166-foot columns at the bridge's western end. Note that those columns were only 15 feet wide - a far smaller design than the current proposal, which is 250 in height and 170 feet wide. President Trump, to be consistent, could, a century later, consider those 166-foot columns.

Only after litigation was filed, and the government responded in March, did they cite the 1924 "authorization."

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By April of this year, before the Commission of Fine Arts meeting, the Arch was being described as 166 feet tall —just like a version of the columns — with the statues on top bringing the total height to 250 feet.

The review processes undertaken by the National Park Service under the National Historic Preservation Act (NHPA), 54 U.S.C. §§ 300101 et seq., and the National Environmental Policy Act (NEPA), 42 U.S.C. 4321 et seq., were both deeply flawed and fail to meet applicable statutory and regulatory requirements, among other things, by excluding consideration of any alternative location, by failing to consider any design changes that might avoid, modify, or mitigate the considerable adverse effects of the project, and by failing to give any consideration to major changes in use (i.e. the addition of military functions) announced late in the review process but never included or considered in that process.

We urge the NCPC to defer its approval of the Applicant's proposal unless and until the Applicant has re-opened the flawed review processes and complies with its responsibilities under these laws. Regardless of whether the Applicant does so or not, the NCPC should understand that its approval of a project that is based on a flawed Section 106 consultation process and a flawed NEPA review process administered by that applicant would itself violate the NCPC's own legal obligations.

For these reasons, we urge the National Capital Planning Commission to reject the Applicant's Request for Approval, or at the very least defer approval until the required statutory authorization is enacted and the regulatory processes are reopened and properly completed for this project.

Respectfully Submitted,

Judy Chesser

Judy Chesser
Chair
Committee of 100 on the Federal City
chair@committeeof100.net

Cc: Members of the Commission
David Maloney, DC SHPO

Founded more than a century ago, the Committee of 100 on the Federal City is a nonprofit organization dedicated to safeguarding and advancing Washington's historic distinction, natural beauty, and overall livability. The Committee's work recognizes the critical value of public planning, informed by traditions that originate from the L'Enfant Plan and the McMillan Commission, continuing to the current day.

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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).

Written Statement to the National Capital Planning Commission

November 5, 2026 Commission Meeting
New Monumental Arch at Memorial Circle — NCPC File No. 8778

Submitted by Cynthia Morrison
Raleigh, North Carolina
Gold Star Mother

Introduction and Request to Withhold Final Approval

Dear Chairman and Members of the Commission:

My name is Cynthia Morrison, I am a resident of North Carolina and a Gold Star mother.

On July 9, 2026, I had the privilege of addressing this Commission regarding the proposed 250-foot triumphal arch at Memorial Circle, at the ceremonial entrance to Arlington National Cemetery.

I am submitting this additional written statement because, in the months since that meeting, I have continued examining the project's plans, environmental assessments, historic preservation findings, visual renderings, lighting specifications, and proposed changes to the surrounding transportation network.

I also submitted written comments to the Advisory Council on Historic Preservation, expressing my concerns about the project's effects on this historically significant landscape. I am including a copy of my original submission, provided as **Attachment 1,** for the Commission to consider alongside the additional information presented here.

The more I have learned, the more concerned I have become.

My concerns have only deepened with the October 27 publication of The Washington Post's independent shadow analysis, which raises additional questions about the project's potential effects on Arlington National Cemetery and the surrounding memorial landscape.

I respectfully urge the National Capital Planning Commission to withhold final approval of this project. The Commission should not authorize an irreversible transformation of this nationally significant historic landscape while substantial questions remain concerning the project's visual, environmental, historic preservation, transportation, operational, and cumulative impacts.

I want to reiterate something I made clear in my July testimony: **I am not opposed to commemorating the 250th anniversary of the United States.** Nor am I opposed to the creation of a meaningful monument honoring our nation's founding, history, and ideals.

My concern is with this particular proposal — its extraordinary scale, its location, its function as a major visitor destination, and its consequences for a historic memorial landscape whose significance is already established.

A Family's Legacy of Military Service and Sacrifice

I come to this discussion from generations of military service. My father served our country, my grandfather served, and my uncles on both sides of my family served as well.

My son, Landon Joseph Morrison, carried forward that tradition. He graduated from the United States Air Force Academy and served honorably, attaining the rank of Captain during his service in the United States Air Force and the United States Space Force. He separated from military service in June 2024. He passed away on July 21, 2025, from a condition determined to be 100% service connected.

For me, honoring those who serve is not an abstract principle. It is part of my family's history and my lived experience.

When Landon was in the eighth grade, we visited Arlington National Cemetery together. We watched the changing of the guard at the Tomb of the Unknown Soldier, stood among the seemingly endless rows of headstones, and reflected on the meaning of military service and sacrifice.

That experience helped shape his understanding of service and his commitment to our country.

Today, as a Gold Star mother, I understand even more deeply what Arlington represents to the families who come there to bury their loved ones, visit their graves, and honor their memory.

Arlington National Cemetery is not merely a historic landscape or a destination for visitors. It is an active national cemetery, a place of profound personal loss, and one of our nation's most sacred places of remembrance.

The landscape surrounding Arlington deserves the degree of care, restraint, and protection commensurate with that responsibility.

The open corridor connecting the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, and Arlington National Cemetery was not created by accident. It is a deliberately composed commemorative landscape whose historic significance rests in its openness, perspective, reciprocal views, and symbolic relationship between national leadership, reconciliation, service, sacrifice, and remembrance.

Its meaning is conveyed not only through what was constructed, but through what was intentionally left open.

The proposed arch would introduce an unprecedented monumental structure into the center of that historic relationship. Its effects would extend far beyond the appearance of the structure itself, potentially changing how this landscape is seen, approached, illuminated, occupied, and experienced for generations.

The question before the Commission is not simply whether the proposed arch can be constructed at Memorial Circle. It is whether permanently transforming this historic landscape can be justified when its existing commemorative significance, historic integrity, and profound emotional impact are inseparable from the very openness, unobstructed views, and solemn atmosphere that this massive structure would fundamentally compromise.

I respectfully submit that it cannot.

The Historic Memorial Landscape and the Kennedy Gravesite

Memorial Circle is not an empty parcel of land awaiting a monumental use. It is part of an intentionally designed commemorative landscape connecting the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House.

The openness, perspective, reciprocal views, and uninterrupted visual relationships within this landscape are themselves historically significant.

The word *Memorial* appears repeatedly throughout this corridor for a reason. The Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, and Memorial Avenue form a deliberate physical and symbolic progression leading to Arlington National Cemetery.

That progression connects President Lincoln's leadership in preserving the Union with the extraordinary human cost of war and the generations of military service and sacrifice represented at Arlington.

The open space is not an absence of meaning.
It is an essential part of how that meaning is conveyed.

President Kennedy, Jacqueline Kennedy, and the Historic Visual Axis

The importance of preserving this visual relationship becomes particularly compelling when examining the history of President John F. Kennedy's gravesite.

On March 3, 1963, President Kennedy made an unscheduled visit to Arlington House. According to historical accounts, a National Park Service ranger explained that Arlington Memorial Bridge had been designed to connect Arlington House with the Lincoln Memorial, symbolizing the reunification of the nation following the Civil War.

Standing on the hillside at Arlington House, looking across the Potomac River toward Washington, President Kennedy was reportedly so moved by the view that he remarked:

"I could stay here forever."

Eight months later, President Kennedy was assassinated.



Figure 1. Jacqueline Kennedy at Arlington National Cemetery, with the Lincoln Memorial and Washington Monument visible across the Potomac River. Photographer and date unknown.

Following his death, Jacqueline Kennedy played a central role in the decision to bury her husband at Arlington National Cemetery. The hillside below Arlington House was selected for his gravesite, along the historic visual axis connecting Arlington House with the Lincoln Memorial.

Jacqueline Kennedy subsequently worked with architect John Carl Warnecke on the design of the permanent gravesite and memorial landscape.

The design was intentionally restrained. Its low profile, natural materials, and integration into the hillside allowed the gravesite to become part of the surrounding landscape rather than dominate it.

That restraint preserved the openness of the setting and the larger visual relationship among Arlington House, the cemetery, Memorial Avenue, Arlington Memorial Bridge, and the monumental core of Washington.

Contemporary accounts described the permanent Kennedy memorial as completing the approximately 1.3-mile axis connecting the gravesite with the Lincoln Memorial across the Potomac River.

This history is especially meaningful because President Kennedy himself had stood on that hillside and recognized the extraordinary character of the view. Months later, that same landscape became his final resting place, and the permanent memorial was designed to respect and preserve its existing historic relationships.

The view is therefore not incidental scenery. It is part of the history, design, and commemorative significance of President Kennedy's gravesite and the larger memorial landscape.

The proposed 250-foot triumphal arch would introduce an unprecedented vertical structure directly into that historic axis.

It would fundamentally alter the visual relationship that existed before President Kennedy's burial, influenced the design of his permanent memorial, and has remained part of the experience of Arlington National Cemetery for more than six decades.

Rather than respecting the deliberate restraint of the existing memorial landscape, a structure of this scale and prominence would not merely compete with it but dominate it, redirecting attention away from the historic relationship among the Lincoln Memorial, Arlington Memorial Bridge, Arlington House, and Arlington National Cemetery.

A landscape deliberately preserved through architectural restraint should not now be overwhelmed by an entirely new monument whose scale and prominence would undermine the very qualities that give the existing landscape its meaning.

I respectfully ask the Commission to consider the Kennedy gravesite not simply as another historic resource within the project's area of potential effects, but as a powerful example of why the integrity of this historic visual axis deserves exceptional protection.

Federal Historic Preservation Findings and Unresolved Adverse Effects

The National Park Service identified adverse effects to 42 historic properties in its Section 106 review. These effects concern more than a view of a proposed building: they include historic vistas, reciprocal sightlines, setting, feeling, association, spatial organization, and the design continuity of a nationally significant commemorative landscape. The Advisory Council on Historic Preservation terminated consultation on September 24, 2026, and issued its final comments to the Secretary of the Interior on October 9. Termination of consultation should not be mistaken for a finding that the adverse effects have been eliminated or accepted by the public.

The Department of the Interior’s October 9 response stated that no final decision had been made and that the Secretary would consider the Council’s comments before deciding the undertaking, after NCPC review. I ask the Commission to identify specifically which adverse effects remain, which measures would avoid or minimize them, and which would merely document or interpret damage that cannot be undone. No amount of signage or landscaping can restore an open historic axis after a 250-foot building has been placed within it.

Shadows Across Arlington and the Memorial Landscape

The Washington Post published an independent shadow analysis on October 27, 2026. Its modeling reported that the proposed structure could cast shadows onto portions of Arlington National Cemetery on as many as 284 days of the year and potentially affect areas containing more than 75,000 graves. These are reported modeling results, not an agency-certified grave-by-grave finding; the duration, timing, and precise footprint require independent technical review. The report also raised questions about the Kennedy gravesite, the Military Women's Memorial, and the surrounding landscape.

The consequences of these shadows would not be confined to Arlington National Cemetery. As the sun moves westward in the afternoon and evening, the arch's shadows would extend eastward across the Potomac River and the surrounding memorial landscape. The Washington Post's modeling identifies potential shadow impacts reaching toward the Lincoln Memorial, the Reflecting Pool, and the Martin Luther King Jr. Memorial. Additional reporting raises concerns about the Vietnam Veterans and Korean War Veterans Memorials. These are not merely ordinary shadows cast by buildings in an urban setting. They would be introduced by a new, exceptionally tall structure into a carefully designed landscape of national remembrance, potentially altering the experience of multiple memorials on both sides of the river.

For families visiting the graves of loved ones at Arlington National Cemetery, and for the countless Americans and international visitors who come to reflect, remember, and pay their respects at our nation's memorials throughout the National Mall and surrounding memorial landscape, the experience of natural light, open sky, and the familiar historic setting is not an incidental design consideration. These surroundings are integral to the solemnity, symbolism, and intended experience of these sacred and historically significant places.

I request comprehensive, publicly available, seasonal, time-stamped shadow diagrams encompassing all potentially affected memorials on both sides of the Potomac River, using the final proposed dimensions, terrain, vegetation, and actual visiting hours. The analysis should distinguish short-duration shadows from sustained effects and explain why consequences of this magnitude were not prominently disclosed earlier in the review process.

Nighttime Illumination and Aviation Warning Lights

The final lighting submission should be evaluated against the existing lighting hierarchy of the Lincoln Memorial, Arlington House, the Kennedy gravesite, and Arlington National Cemetery. Project materials describe extensive architectural and site lighting; the lighting plans must be assessed in terms of actual illumination, glare, skyglow, light spill, and winter visibility—not merely attractive nighttime renderings. Any aviation safety lighting should be identified separately, with the responsible aviation authority's conditions made clear.

The proposed arch's nighttime illumination must be evaluated in the context of the existing lighting hierarchy of the Lincoln Memorial, Arlington House, the Kennedy gravesite, Arlington National Cemetery, and the surrounding memorial landscape on both sides of the Potomac River. These historic places possess distinct nighttime characteristics that contribute to their solemnity, symbolism, and intended experience. Introducing a massive, prominently illuminated structure into this carefully composed landscape would fundamentally alter those relationships.

Darkness itself is an essential part of Arlington National Cemetery's solemn nighttime character. Unlike the illuminated monuments across the Potomac, Arlington's thousands of individual graves remain largely unlit after dark. Although certain prominent structures receive carefully controlled illumination, the cemetery's prevailing darkness preserves an atmosphere of tranquility, restraint, and reverence. It is a meaningful contrast to the illuminated monumental landscape of Washington, D.C., and one that deserves deliberate protection.

The importance of preserving this nighttime environment is demonstrated by Arlington National Cemetery's own historic preservation review. In December 2020, the cemetery prepared a formal assessment concerning the permanent illumination of a single existing flagpole in front of Arlington House. That comparatively modest proposal involved just two small spotlights, yet the assessment examined an area extending approximately 1,300 yards in length and 1,000 yards in width. It identified historic properties within the affected area and documented nighttime views from the Kennedy gravesite, Memorial Avenue, Memorial Circle, and other locations. The assessment ultimately concluded that the flagpole lighting would have no adverse effect on the historic properties. If illuminating a single flagpole warranted that level of documentation and scrutiny, how can the dramatically greater nighttime consequences of a 250-foot illuminated arch be considered adequately evaluated without similarly comprehensive, publicly accessible studies?

The project's lighting plans must be evaluated for actual illumination levels, glare, skyglow, light spill, and seasonal visibility, particularly during winter months when vegetation provides less screening. Any required aviation warning lights should be identified and evaluated separately, with the applicable requirements and determinations of the responsible aviation authorities clearly documented. These effects cannot be adequately assessed through attractive architectural renderings alone.

I request comprehensive, photometrically grounded, publicly available nighttime visual simulations from significant locations throughout the affected historic landscape, including the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington House, the Kennedy gravesite, and appropriate locations within Arlington National Cemetery. These simulations should also include views from the Washington Monument and from the western-facing steps of the World War II Memorial, looking toward the Lincoln Memorial and proposed arch, providing both elevated and ground-level perspectives from the National Mall area. They should accurately depict the proposed architectural illumination, any required aviation warning lights, existing ambient lighting conditions, and seasonal variations, including leaf-off conditions.

The Commission should explain how the proposed arch's nighttime illumination would remain visually subordinate to, rather than compete with or overwhelm, the established character of these nationally significant memorials. Particular attention should be given to whether its lighting would diminish the visual prominence and contemplative setting of the Kennedy Eternal Flame and other existing memorial features.

Finally, the operational hours of the surrounding plaza, interior spaces, and observation deck must be clearly established. Would the plaza remain accessible throughout the night? Would the building and observation deck have restricted operating hours? Could visitors occupy an elevated observation deck overlooking Arlington National Cemetery after the cemetery has closed to the public? These are important questions involving public access, security, privacy, and the dignity of those interred at Arlington and their families. They deserve clear answers before final approval.

A Large, Occupied Building Rather Than a Simple Memorial Arch

The NCPC November 2026 project synopsis describes a roughly 250-foot arch, 166 feet wide, with a 55-foot opening, and an interior containing six stairways and five elevators, including access to an observation deck. The June Assessment of Effects describes an occupied, multilevel structure and a roughly 9,812-square-foot exterior observation deck at approximately 161 feet 6 inches above grade. The plans therefore depict a substantial public destination with circulation, utilities, security screening, and public occupancy—not a purely symbolic, open-air monument.

The public deserves a clear accounting of the building's final floor area, maximum occupancy, visitor capacity, timed-entry or ticketing policies, accessibility, restrooms, exhibits, commercial amenities, and responsibility for long-term operations and maintenance. Equally important, who will control the observation deck, when will it close, and what enforceable restrictions will protect grieving families from possible photography and observation into an active national cemetery?

A structure of this height, complexity, and anticipated public use also raises significant questions about fire protection, emergency evacuation, and medical response. I request a publicly reviewable life-safety and emergency operations plan identifying the applicable building and fire codes, maximum occupancy limits, fire detection and suppression systems, emergency communications, evacuation routes, stairway capacity, accessible evacuation procedures, and protocols for safely evacuating visitors from the observation deck if elevators become unavailable. How would firefighters and emergency medical personnel reach visitors on the upper levels, particularly during a fire, power failure, severe weather event, or security emergency?

Emergency medical access presents another serious concern. Memorial Circle is already a heavily traveled transportation hub, and the proposed arch would introduce additional pedestrian activity, visitor queues, security screening, and potentially significant congestion. Would emergency medical personnel or first-aid facilities be stationed on-site during operating hours? Where would ambulances stage, and how would they reach the building during peak traffic, road closures, or security lockdowns? What response-time modeling has been conducted, and how would emergency access be coordinated among the National Park Service, District of Columbia, Arlington County, and other responsible agencies? These questions are particularly important given the location's role in providing access to Arlington National Cemetery.

The elevated observation deck also warrants explicit consideration of fall prevention and suicide-prevention safeguards. At more than 160 feet above ground level, the consequences of a fall would be catastrophic. What permanent physical protections would prevent accidental falls or intentional jumps? Have the proposed barriers been independently evaluated for their height, design, resistance to climbing, and effectiveness without compromising the historic landscape? What procedures would govern intervention, emergency medical response, and temporary closure in the event of a crisis? These are foreseeable life-safety considerations that should be resolved through professional risk assessment and appropriate design protections, rather than left to future operational decisions.

The Commission should also clarify nighttime access. Would the surrounding plaza remain open 24 hours, as the Lincoln Memorial generally is? Would the building and observation deck operate on a timed-entry schedule, and could visitors overlook Arlington National Cemetery after its public visiting hours? These are distinct operational questions with implications for security, emergency staffing, public safety, and the dignity of those interred at Arlington. None should be left to assumption.

Before granting final approval, the Commission should require documentation demonstrating that the proposed structure can be safely occupied, evacuated, secured, and served by emergency responders under both ordinary and foreseeable emergency conditions. Architectural plans showing stairways and elevators are not a substitute for a comprehensive, coordinated emergency operations plan.

Newly Described Military and Security Functions: What Is Actually Being Approved?

In a sworn declaration filed in federal court on October 28, 2026, Secretary of Defense Pete Hegseth described the proposed triumphal arch as serving both commemorative and military-security purposes. His declaration identifies intended military command-and-control capabilities, communications and surveillance infrastructure, counter-unmanned-aircraft systems, elevated protective-overwatch and counter-sniper positions, and secure storage for military equipment, ammunition, and drones. These are not merely speculative concerns raised by members of the public. They are functions described under penalty of perjury by a senior federal official.

Particularly significant is the declaration's assertion that these military functions would be incorporated into the existing architectural design without requiring structural modifications. Yet the November NCPC project synopsis states that, apart from updated transportation and lighting plans, no other plan elements have changed. These statements are not necessarily contradictory, but they raise an essential question: Have the military and security functions described in federal court been fully disclosed to the NCPC and evaluated as part of the undertaking now before the Commission?

A monument designed to accommodate military surveillance, counter-drone operations, armed protective positions, command-and-control functions, and ammunition storage presents operational considerations fundamentally different from those of a conventional public memorial. How would these functions coexist with tourists, pedestrians, tour buses, emergency vehicles, and funeral processions? What additional security personnel, access restrictions, surveillance equipment, protective barriers, emergency procedures, and operational infrastructure would be required? Would certain areas become restricted, and under what circumstances could military security operations result in the closure of the observation deck, surrounding plaza, or adjacent roadways?

Recent developments at Mar-a-Lago illustrate how security requirements can extend far beyond the boundaries of a protected facility. Federal authorities have deployed military air-defense and counter-drone systems in surrounding areas, while aviation restrictions, road closures, and controlled-access measures have affected nearby transportation and public spaces. Although the proposed arch serves a different purpose and would not necessarily require comparable measures, the military-security functions described in Secretary Hegseth's sworn declaration raise legitimate questions about what additional protective infrastructure could be deemed necessary at Memorial Circle, by whom, and under what standards.

Has a comprehensive threat and security assessment been conducted that considers not only the protection of the proposed structure, but also whether its military functions could introduce additional security risks into this heavily visited historic landscape? Could future protective requirements involve additional equipment, barriers, restricted areas, temporary closures, or changes to surrounding transportation infrastructure? How would such measures affect Arlington National Cemetery, funeral processions, emergency responders, and the public's continued access to these nationally significant memorials?

The federal government's experience protecting high-profile sites demonstrates how security requirements can produce an expanding security footprint, with consequences extending well beyond the facility itself. The NCPC must understand and evaluate the potential full security footprint of this project before granting final approval—not discover its consequences incrementally after construction.

These questions also have implications for public safety, emergency response, historic preservation, and the project's environmental assessment. The Commission should require the responsible agencies to clarify which military functions are definite operational requirements, which are contingent capabilities, and how each has been incorporated into the submitted plans. If the intended uses introduce impacts not previously evaluated, the appropriate agencies should determine whether supplemental review is required before final approval.

The public-facing architectural renderings largely depict a serene, uncluttered monument. They do not demonstrate how the site would function with the military-security capabilities described in the sworn declaration. I request realistic, publicly available operational visualizations identifying confirmed features and clearly distinguishing potential contingencies, including security screening, restricted areas, surveillance and counter-drone equipment, armed protective positions, pedestrian queues, protective barriers, and possible emergency lockdowns.

The public deserves to know the complete nature and intended functions of the structure being proposed at the ceremonial entrance to Arlington National Cemetery. The Commission should not grant final approval without reconciling the descriptions presented in federal court with the architectural, operational, environmental, and historic preservation materials submitted for its review.

Funerals, Military Honors, and the Privacy of Grieving Families

Arlington National Cemetery is an active cemetery where military honors and funeral services take place while visitors and families mourn. Approximately 24 to 27 funeral services are conducted each weekday, making the protection of funeral processions, military honors, and grieving families a daily responsibility—not an occasional consideration. The proposed observation deck and plaza would introduce a new elevated vantage point and substantial visitor activity near that sacred setting. Families should not be made into a spectacle. Public observation, amplified events, photography, drones, and security activity deserve explicit, enforceable rules, not vague assurances.

Arlington National Cemetery's own visitor and media policies recognize the importance of protecting grieving families from unwanted observation and photography. Visitors are expected to respect funeral services, maintain appropriate distances, and refrain from intrusive photography of individuals who are visibly mourning. Yet the proposed observation deck would introduce an entirely new elevated vantage point outside the cemetery's boundaries, potentially allowing visitors to observe, photograph, or record private moments of grief from above. How would Arlington's established expectations of dignity and privacy be protected when observers are no longer physically within the cemetery and subject to its visitor rules?

I ask for a written consultation record with Arlington National Cemetery leadership addressing funeral processions, the sound of Taps, rifle salutes, chaplains' words, visitation, privacy, and uninterrupted access. What agency would have the authority to restrict photography, amplified sound, public events, or observation-deck activity that interferes with funeral services? Would Arlington National Cemetery leadership have any authority to request temporary restrictions or closures when the dignity and privacy of grieving families are at risk?

The Commission should require enforceable safeguards for both construction and permanent operation, including clearly defined responsibilities among agencies, procedures for complaints, and emergency restrictions when necessary. These protections should be established before approval, rather than left to future operational decisions after the observation deck and public plaza have been constructed.

Construction Impacts:
Soil Conditions, Foundation Engineering, Noise, and Disruption

Subsurface Conditions, Foundation Engineering, and Excavation

Memorial Circle occupies Columbia Island, a man-made landscape created using material dredged from the Potomac River and situated between the Potomac River and Boundary Channel. The site's underlying soil conditions present significant engineering challenges for a structure of the proposed arch's size and weight.

During the April 16, 2026, Commission of Fine Arts meeting, the project design team acknowledged that the soil conditions were unfavorable for a traditional foundation. Preliminary engineering calculations indicated that the proposed structure could require piles spaced approximately five feet apart beneath a thick concrete mat foundation.

At the May 21, 2026, Commission of Fine Arts meeting, the project representative reported that two geotechnical borings had been completed, with bedrock encountered approximately 70 feet below the surface. These findings raise important questions about the depth and design of the foundation, the extent of excavation, groundwater management, and the long-term stability of the structure and surrounding infrastructure.

What do the completed geotechnical investigations establish about soil bearing capacity, groundwater levels, pile depths, settlement risks, and the structural loads associated with this 250-foot monument? Have the foundation design and construction methods undergone independent geotechnical and structural engineering review?

The National Park Service's Assessment of Effects Report estimates approximately 1,400 truckloads of excavated soil and 400 truckloads of engineered fill. Such extensive earthmoving raises additional questions about construction traffic, staging, disposal, vibration, erosion and sediment control, and potential effects on nearby roadways, utilities, historic resources, and waterways.

What excavation depths and methods are proposed? Would groundwater pumping or temporary excavation support be necessary? Could pile installation or excavation affect adjacent infrastructure through vibration, ground movement, or changes in groundwater conditions? What protections would prevent sediment-laden runoff or construction-related contamination from entering the Potomac River or Boundary Channel?

Before granting final approval, the NCPC should require disclosure of the geotechnical findings, foundation design assumptions, anticipated excavation quantities, construction methods, groundwater management plans, and associated environmental and transportation impacts. A project of this magnitude, constructed on historically dredged land between two waterways, warrants a transparent and independently supported engineering assessment.

Construction Duration, Noise, Vibration, and Funeral Operations

The June 2026 National Park Service Assessment of Effects described an estimated two-to-three-year construction period, potentially involving two 10-hour shifts per day—up to 20 hours of construction activity—along with tall cranes, extensive excavation, heavy equipment, and substantial truck movements. Even if these represent maximum scenarios rather than a finalized construction schedule, their potential effects on funeral ceremonies, military honors, nearby roads, the river corridor, and cemetery visitors are substantial.

Arlington National Cemetery conducts approximately 24 to 27 funeral services each weekday, generally between 9 a.m. and 3 p.m. Historical congressional records also document approximately five to ten Saturday services. These figures illustrate the extraordinary challenge of coordinating prolonged, potentially noisy construction activity with the daily responsibilities of an active national cemetery.

How can a construction schedule involving up to 20 hours of daily activity be reconciled with the solemnity of as many as 27 military funeral services occurring during a six-hour period?

What hours would heavy equipment, drilling, pile installation, concrete operations, nighttime illumination, and truck deliveries actually be permitted? Would construction stop during funerals and military honors? If so, how would those suspensions be coordinated when multiple services may occur simultaneously at different locations throughout the cemetery? How much of the proposed construction day would remain available for disruptive work?

Have independent noise and vibration studies been conducted at actual funeral locations, particularly those nearest Memorial Circle? Have the agencies evaluated whether construction noise could interfere with the playing of Taps, rifle volleys, chaplains' words, spoken prayers, and the quiet moments families share during burial services? Would noise from construction continue to affect families visiting gravesites outside scheduled funeral hours?

The potential effects extend beyond noise alone. How would vibration, dust, construction traffic, nighttime lighting, and emergency access be monitored? What restrictions would govern heavy truck movements during funeral processions? How would construction activities affect Memorial Bridge, Memorial Circle, surrounding roads, and emergency vehicles traveling to or from the cemetery?

If meaningful protections require repeated or prolonged construction suspensions, the public deserves to understand how those restrictions would affect the project's schedule, costs, and feasibility. Conversely, if construction is expected to continue during funeral services, the responsible agencies must disclose anticipated noise levels and explain how the dignity of those ceremonies will be protected.

I request a detailed, enforceable construction management plan developed in direct consultation with Arlington National Cemetery leadership. That plan should establish measurable noise and vibration limits, monitoring locations, restricted activities, procedures for suspending disruptive work, funeral-procession protections, emergency access requirements, and clear authority to enforce those restrictions. Compliance should be publicly reported, with procedures for addressing violations and complaints.

Protecting military funeral services cannot be left to informal coordination or promises of consideration after construction begins. The NCPC should require the necessary engineering studies, construction-impact assessments, and enforceable protections before granting final approval.

Permanent Traffic Redesign, Visitor Access, and Safety

The proposed triumphal arch would require substantial changes to Memorial Circle and its surrounding transportation network, including roadway configurations, traffic signals, pedestrian crossings, visitor circulation, security screening, bus and rideshare operations, and access to Arlington National Cemetery. The NCPC project materials acknowledge continuing interagency coordination on transportation.

This is not an isolated development site. Memorial Circle is part of a nationally significant ceremonial landscape and an important regional transportation corridor. Its roadways serve commuters, pedestrians, cyclists, tourists, emergency responders, funeral processions, and families visiting Arlington National Cemetery. These uses are not interchangeable, and their competing demands must be evaluated before final approval.

Existing Roadway Hazards and Crash Prevention

Questions have been raised about existing traffic hazards at Memorial Circle, including vehicles traveling at excessive speeds from Memorial Bridge, roadway departures, and the possibility of vehicles crossing curbs or entering landscaped areas.

I request a comprehensive review of documented crashes and traffic incidents at Memorial Circle and its approaches, including collision locations, vehicle speeds where known, roadway departures, pedestrian and bicycle incidents, and crashes involving curbs, medians, or landscaped areas.

The Commission should also examine whether the proposed redesign would eliminate existing hazards, introduce new conflict points, or place substantial fixed structures in areas potentially vulnerable to errant vehicles.

Importantly, roadway safety improvements were being considered before the proposed arch. Existing traffic and pedestrian safety problems should be addressed on their own merits, independently of whether this monument is constructed. The need to improve Memorial Circle's traffic operations does not, by itself, establish the necessity of building a 250-foot arch.

Protective Barriers, Bollards, and the Actual Appearance of the Site

A structure of this magnitude, designed to attract large numbers of visitors and potentially accommodate the military and security functions described in recent federal court filings, raises significant questions about physical security and vehicle-impact protection.

Would protective bollards, concrete barriers, vehicle checkpoints, retractable barriers, security fencing, or other permanent or temporary protective measures be required around the monument, its observation deck entrances, and surrounding pedestrian areas?

Such measures could be deemed necessary by the agencies responsible for security, whether as part of the initial design or in response to changing threat assessments. Their location, dimensions, appearance, and operational effects should therefore be disclosed and evaluated before final approval.

The public-facing architectural renderings emphasize an open, landscaped ceremonial setting. But those images do not necessarily illustrate the full range of protective infrastructure that might be required during ordinary operations, major events, heightened security conditions, or emergency closures.

Where would protective barriers be installed? Would they extend into Memorial Circle, along Memorial Bridge, or toward the approaches to Arlington National Cemetery? Would they interrupt historic views,

alter the character of the landscape, constrain pedestrian movement, or complicate access for emergency vehicles and funeral processions?

I request realistic, clearly labeled site plans and visual simulations showing confirmed security infrastructure and separately identified, reasonably foreseeable security contingencies. The Commission should not approve an idealized architectural presentation without understanding the potential physical and operational appearance of the completed site.

Funeral Processions, Emergency Access, and Regional Traffic

The proposed redesign must be evaluated in the context of Arlington National Cemetery's continuing funeral operations. Funeral processions cannot be treated as ordinary tourist traffic or expected to compete with crowds arriving at a major visitor attraction.

How would funeral processions be prioritized at redesigned intersections and crossings? Would the current principal cemetery approach be altered or closed? If so, what would replace it, and how would families, funeral vehicles, and cemetery personnel be affected?

Memorial Bridge is also an important regional crossing. Traffic congestion, roadway closures, security restrictions, and unexpected incidents can have consequences extending beyond the immediate project area into Washington, D.C., and Northern Virginia.

I request transparent, scenario-based transportation modeling addressing peak tourist visitation, holiday crowds, major public events, funeral processions, construction detours, and temporary security lockdowns.

The analysis should also examine emergency situations: a serious collision on Memorial Bridge, a medical emergency at the observation deck, a fire requiring apparatus access, an ambulance transporting a patient, or an evacuation occurring while funeral services are underway.

If protective barriers or security checkpoints restrict vehicle movement, how would ambulances, fire apparatus, and other emergency vehicles pass through them without dangerous delays? Which agency would have authority to close or reopen roadways, and how would federal, District of Columbia, and Virginia agencies coordinate their responses?

These are operational questions with direct consequences for public safety. They should be resolved through documented interagency planning rather than deferred until after construction.

Pedestrian Circulation, Accessibility, and Visitor Congestion

The arch's proposed observation deck and visitor facilities could generate substantial pedestrian activity, including queues for security screening, elevators, restrooms, and other amenities.

Where would visitors wait during periods of heavy demand? Could queues extend into pedestrian crossings, landscaped areas, or circulation routes? Would sufficient space remain for people who are simply traveling through Memorial Circle rather than visiting the monument?

The Commission should require detailed pedestrian-capacity and accessibility studies addressing people using wheelchairs, walkers, and other mobility aids; families with children; tour groups; cyclists; and visitors crossing between Memorial Bridge, Arlington National Cemetery, and nearby memorial destinations.

The transportation analysis should also account for tour buses, rideshare pickups, taxis, delivery vehicles, and the possibility that visitors unfamiliar with the roadway configuration may stop unexpectedly, cross outside designated areas, or create additional conflicts with moving traffic.

Accessible routes must remain functional during peak visitation, security restrictions, special events, and emergencies—not merely under ideal operating conditions.

Food Trucks, Street Vendors, and Commercial Visitor Activity

The National Mall provides a familiar example of how food trucks, street vendors, souvenir sales, tour buses, rideshare vehicles, and commercial visitor services can become established features of a heavily visited public landscape.

Given that the proposed arch is intended to become a major tourist destination, what provisions would govern the food trucks, street vendors, commercial services, and associated visitor activity that such an attraction could generate at Memorial Circle? Would food trucks, souvenir vendors, mobile concessions, or other commercial operations be permitted? Who would authorize and regulate them, and where would they be located?

How would vendor parking, pedestrian queues, deliveries, trash collection, sanitation, and service-vehicle movements affect traffic circulation, public safety, landscaping, and the surrounding historic environment?

Even if these activities are not presently proposed or authorized, the Commission should examine foreseeable visitor-service demands and require clear policies governing future commercial uses.

The concern is not simply whether a food truck or souvenir stand might appear near the monument. It is whether the cumulative effects of tourism, commercial activity, transportation infrastructure, and security operations could gradually transform the ceremonial entrance to Arlington National Cemetery into a congested visitor and entertainment destination.

That possibility deserves serious consideration before irreversible changes are made to this historic landscape.

Required Transportation and Operational Review

Before granting final approval, I respectfully request that the NCPC require a comprehensive, publicly available transportation and site-operations plan that addresses documented crash hazards, roadway design, pedestrian safety, accessible access, funeral processions, emergency response, protective infrastructure, visitor queues, commercial activity, and security-related closures.

The public should be able to see how the completed project would function under realistic conditions, not only how it appears in architectural renderings.

The Commission should also require clear identification of the agencies responsible for traffic management, security restrictions, enforcement, maintenance, and long-term operations, together with an explanation of how proposed safeguards would be implemented and funded.

The ceremonial approach to Arlington National Cemetery should not be fundamentally redesigned around a major tourist attraction without first demonstrating that the resulting transportation system will be safe, accessible, functional, and respectful of the sacred place it serves.

Aviation Safety, Military Funeral Flyovers, and Obstruction Lighting

The proposed 250-foot triumphal arch would stand near Ronald Reagan Washington National Airport, within an already complex and heavily used aviation environment. Its extraordinary height and location warrant careful consideration of aircraft operations, temporary construction equipment, nighttime illumination, and ceremonial military aviation associated with Arlington National Cemetery.

On September 18, 2026, the Federal Aviation Administration issued its aeronautical determination concluding that the proposed arch would not constitute a hazard to air navigation, subject to specified marking and lighting conditions. I acknowledge that finding. However, the FAA's determination does not resolve every question concerning the project's visual, operational, and historic-preservation impacts.

Significantly, the FAA's preliminary review had contemplated red obstruction lights, while its final determination instead specified a nonstandard illuminated eternal flame atop the structure and floodlight projectors directed toward the arch to make it visible to pilots.

This distinction is important. Aviation-required lighting is not merely a decorative architectural feature. It is an operational requirement that could substantially influence the monument's nighttime appearance and its relationship to the Lincoln Memorial, Memorial Bridge, Arlington National Cemetery, and the surrounding memorial landscape.

The Commission should establish whether the final lighting design submitted for approval fully incorporates the FAA's requirements, including the precise configuration, intensity, direction, operating hours, and maintenance of the proposed illumination. Have realistic nighttime simulations been prepared showing the aviation-required lighting from significant viewpoints on both sides of the Potomac River?

The FAA's aeronautical review also did not constitute a comprehensive assessment of potential glint and glare. I request clarification of whether the proposed floodlighting and illuminated torch have undergone separate evaluation for possible visual distraction to pilots, effects on nearby roadways, and impacts on the nighttime character of Arlington National Cemetery.

Temporary construction equipment presents additional considerations. The proposed excavation and foundation work may require tall cranes and other equipment extending above the completed monument's height. The public should be informed of the maximum anticipated equipment heights, applicable FAA notice or approval requirements, and any restrictions necessary to protect aviation operations throughout construction.

Finally, Arlington National Cemetery is a place where military funeral honors may include ceremonial aircraft flyovers. Although I do not claim that the arch would necessarily prohibit or interfere with these operations, I request written confirmation that the appropriate military aviation authorities and cemetery leadership have been consulted concerning the proposed structure, construction cranes, and any associated operational restrictions.

The Commission should disclose the results of that coordination and explain whether any changes to ceremonial flight procedures, routes, or operating conditions would be necessary.

A determination that the arch does not constitute a hazard to air navigation should not be treated as a determination that its aviation-related lighting, construction requirements, or potential effects on military funeral honors are without consequence. Those distinct impacts deserve transparent consideration before final approval.

Environmental Effects and Cumulative Review

The environmental consequences of the proposed triumphal arch cannot be adequately understood by examining its individual components in isolation. The project involves substantial excavation and foundation construction, new impervious surfaces, stormwater infrastructure, permanent illumination, increased visitor activity, transportation changes, and potentially extensive security operations. These activities would occur within a historically significant landscape situated between the Potomac River, Boundary Channel, and Arlington National Cemetery. The central question is whether the environmental review has adequately considered the combined effects of the monument as it would actually be constructed, illuminated, secured, visited, and operated.

Wildlife and Seasonal Environmental Conditions

Memorial Circle is not an ecologically vacant site. Photographs taken in November 2022 and August 2024 document Canada geese using its grassy areas during different seasons. These photographs, provided with the photographer's permission and included as Exhibit A, offer direct evidence of wildlife activity at the proposed construction location. Deer have also been observed grazing in the area, including a recent sighting reported by a visitor to Memorial Circle. Longer-term observations of bird activity further suggest that wildlife use of this landscape is not an isolated occurrence.

Although these observations do not, by themselves, establish that the proposed arch would cause ecological harm, they reinforce the need to determine whether the environmental assessment adequately examined seasonal wildlife activity, migratory species, terrestrial wildlife, habitat disturbance, construction impacts, and potential disorientation or collision risks associated with extensive nighttime illumination.

Subsurface Conditions, Water Resources, and Construction Effects

The site's location on dredged fill presents additional environmental questions. Commission of Fine Arts proceedings identified challenging subsurface conditions at Memorial Circle, including bedrock approximately 70 feet below the surface, raising important questions about the environmental effects of excavation and foundation construction. Deep foundations, excavation, groundwater management, concrete placement, and substantial construction-vehicle activity could introduce environmental consequences that deserve careful evaluation. The Commission should clarify how the project would manage excavated materials, groundwater, sediment, stormwater runoff, and potential effects on the adjacent Potomac River and Boundary Channel. These concerns should be evaluated alongside construction noise, vibration, vegetation disturbance, and the cumulative effects of prolonged activity in this sensitive setting.

Permanent Illumination and Combined Operational Impacts

The project's environmental footprint would not end when construction is completed. Architectural floodlighting, FAA-related aviation illumination, increased nighttime visitation, traffic circulation, security equipment, and other operational requirements could produce continuing effects on wildlife, surrounding habitats, and the character of the riverfront landscape. The Commission should determine whether these effects have been assessed collectively, including their interaction across seasons and during nighttime hours. An assessment of individual lighting fixtures or transportation features does not necessarily establish that their combined consequences have been adequately evaluated.

Changes to the Project and the Adequacy of Environmental Review

Of particular concern is whether the environmental assessment and Finding of No Significant Impact fully reflect the latest project configuration and intended operations. The military and security functions described in the October 28, 2026 sworn federal court declaration, the FAA's September 18 aviation-lighting determination, and the continuing development of transportation, visitor-access, and security arrangements raise questions about the completeness of the environmental record. The existence of additional information does not automatically establish that a supplemental environmental assessment is legally required. It does, however, warrant a transparent explanation of whether these functions and requirements were considered, what potential effects were evaluated, and whether any changes or new information call for additional analysis.

I respectfully request that the National Capital Planning Commission identify the environmental studies supporting its conclusions, disclose any remaining areas of uncertainty, and explain whether the environmental assessment and Finding of No Significant Impact adequately address the reasonably foreseeable cumulative effects of the project in its current form, including the newly disclosed military and security functions described in the October 28, 2026 sworn declaration of the Secretary of Defense, and the additional infrastructure, equipment, operational activities, and protective measures those functions could require.

The question is not simply whether an environmental assessment was completed. It is whether that assessment meaningfully examined the consequences of the monument and its associated operations as they are actually proposed.

Historical Congressional Authorization and the Limits of Precedent

The administration has cited congressional authorization dating to 1925 as justification for constructing the proposed triumphal arch at Memorial Circle. However, the historical authorization must be understood in the context of what Congress actually approved at that time, rather than treating it as an unrestricted authorization for any future monument or facility at this location.

The Act of February 24, 1925 (43 Stat. 974) authorized construction of Arlington Memorial Bridge, its approaches, associated roadways, and landscape features, in accordance with the designs, surveys, and cost estimates submitted to Congress by the Arlington Memorial Bridge Commission on April 22, 1924.

Those historical plans contemplated two slender monumental columns, approximately 166 feet tall, positioned on opposite sides of the ceremonial approach. Their purpose was to frame the historic visual relationship between Arlington and the Lincoln Memorial, not to obstruct it. The columns were never constructed, and the completed Memorial Circle preserved the openness of this nationally significant landscape.

The proposed 250-foot triumphal arch is fundamentally different in scale, massing, design, purpose, and operation. It would occupy the center of the historic visual corridor and incorporate elevators, an observation deck, public facilities, extensive illumination, and substantial changes to surrounding transportation and visitor circulation.

Even more significantly, the original congressional authorization did not contemplate the military and national-security functions now described in the October 28, 2026 sworn declaration of the Secretary of Defense. The declaration identifies intended functions involving surveillance and communications

equipment, command-and-control capabilities, armed overwatch, counter-drone operations, and associated equipment storage.

These functions introduce an entirely different dimension to the project. A commemorative landscape feature authorized in connection with a memorial bridge a century ago cannot simply be assumed to provide congressional authorization for a modern military and security installation.

The 1925 statute permitted certain changes to the bridge's design and location within the authorized project's limitations. Whether that provision can legally support the present proposal is a question requiring careful examination of the statute, the incorporated 1924 plans, subsequent congressional actions, and applicable federal law.

I respectfully request that the National Capital Planning Commission identify the specific statutory authority relied upon for the proposed arch, provide the original congressional plans and relevant legislative history, and explain how that authority extends to the substantially different structure and functions now proposed.

The Commission should also clarify whether the newly described military functions require separate authorization, additional agency consultation, or reconsideration of the project's historic-preservation and environmental reviews.

I recognize that questions concerning the project's legal authority are being contested in federal litigation. I am not asking the Commission to resolve those disputes. I am asking it to ensure that its administrative record clearly distinguishes what Congress authorized in 1925 from what the federal government proposes to construct and operate in 2026.

A century-old authorization for a memorial bridge and its associated landscape features should not be treated as blanket authorization for a monumental, occupied, and potentially militarized structure that fundamentally alters the historic setting the original project was designed to preserve.

Procurement, Costs, and Long-Term Stewardship

The public deserves a complete and transparent financial accounting before a project of this magnitude receives final approval. To date, fundamental questions remain concerning the total projected cost of the proposed triumphal arch, its sources of funding, the contractors engaged to perform the work, and the financial obligations that would continue long after construction is completed.

Federal procurement records identify a National Park Service task order, 140P2026F0145, awarded to Otak, Inc. in May 2026 for environmental assessment and compliance services associated with the Memorial Circle project. This preliminary-services award should not be confused with a contract to construct the arch. The identity of any general construction contractor, the status of construction-related contracts, the procurement methods employed, and the full estimated project budget should be publicly disclosed.

Questions have also been raised about the possible use of existing White House contracts for work associated with the arch. These reports warrant clarification, including whether such contracting arrangements were ultimately used, the legal authority for doing so, and whether competitive procurement requirements were satisfied. Public confidence requires transparency regarding how contractors are selected, how costs are established, and how federal resources are committed.

The financial implications extend well beyond the monument's initial construction. Its challenging subsurface conditions, substantial foundation requirements, elevators, observation deck, visitor facilities, extensive lighting systems, security infrastructure, and redesigned transportation network would create continuing operational and maintenance responsibilities. The Commission should require a comprehensive life-cycle cost assessment addressing staffing, utilities, inspections, repairs, equipment replacement, emergency services, security operations, and eventual major rehabilitation.

The newly described military and national-security functions introduce additional questions. Who would finance, install, operate, maintain, and eventually replace the surveillance equipment, communications systems, counter-drone capabilities, and other specialized infrastructure identified in the Secretary of Defense's October 28, 2026 sworn declaration? Would these costs be included in the monument's published budget, funded through separate Department of Defense appropriations, or distributed among multiple federal agencies? Which agency would ultimately be responsible for coordinating and funding these operations?

The public also deserves clarity regarding the distinction between private contributions and taxpayer obligations. Even if private donations finance some or all of the initial construction, that would not necessarily eliminate federal expenditures for site preparation, transportation improvements, security, staffing, maintenance, or future repairs. The Commission should identify the proposed funding sources, any conditions attached to private contributions, and the agencies responsible for long-term stewardship.

I respectfully request that the National Capital Planning Commission require disclosure of a credible total project budget, a detailed funding and procurement plan, and an assessment of the monument's anticipated long-term operating and maintenance costs before granting final approval.

A permanent monument should not be approved without a clear understanding of who will pay for its construction, who will be responsible for its operation and security, and what financial obligations will be passed to future generations.

Public Participation, Changed Project Descriptions, and Comparable Review

The Section 106 historic preservation consultation process concluded without agreement on how to resolve the project's adverse effects, and the Advisory Council on Historic Preservation received public comments after consultation was terminated. The project's publicly described functions have continued to evolve. A complete and responsible review requires the National Capital Planning Commission to identify precisely which version of the undertaking is before it, explain how material changes have been evaluated, and demonstrate that the concerns raised by preservation advocates, veterans, Gold Star families, and other members of the public have received substantive consideration.

Meaningful public participation requires more than an opportunity to comment on architectural renderings. It requires access to a complete and accurate description of the undertaking, including its intended functions, operational requirements, and reasonably foreseeable consequences. The October 28, 2026 sworn declaration of the Secretary of Defense introduced military and national-security functions that substantially expand the public's understanding of the proposed monument. The Commission should explain whether these functions were included in the undertaking previously presented for public and agency review, whether they were evaluated during the Section 106 and environmental review processes, and whether the public and consulting agencies have had a meaningful

opportunity to examine and respond to them. Public participation cannot fulfill its intended purpose if the nature of the project continues to evolve while opportunities for review are drawing to a close.

The accelerated timetable also deserves a transparent explanation. Recent reporting and litigation have raised questions about whether the public and reviewing agencies have had sufficient time to examine the complete undertaking, particularly as its described uses have changed. The question is not whether any single comparison proves illegality; it is whether this proposal has received the thorough, independent review warranted by its extraordinary location and the permanent, irreversible transformation of a nationally significant historic landscape that its construction would bring about.

I participated in the Commission's July 9, 2026 public meeting and am returning to speak on November 5 because the concerns surrounding this proposal have not diminished. They have grown as additional information has emerged. Public participation should not be measured simply by the number of comments received or speakers heard. It should be measured by whether the concerns raised are meaningfully examined, whether material questions receive substantive answers, and whether the public's participation can genuinely inform the Commission's decisions before those decisions become final.

The National Desert Storm and Desert Shield Memorial offers a useful comparison. Its development extended over many years and involved congressional authorization, planning, design, fundraising, federal review, and construction. These stages should be distinguished rather than combined into a single approval period. The relevant principle is not that every memorial must follow an identical timetable, but that the urgency of commemorating a particular anniversary should not displace adequate historic preservation review, environmental analysis, public participation, financial transparency, or serious consideration of alternatives.

The nation's 250th anniversary is an extraordinary milestone worthy of thoughtful commemoration. But its significance should encourage greater care, not greater haste. A monument intended to represent the nation's history and endure for generations deserves a review process that is equally deliberate, transparent, and respectful of the historic places and people it will affect.

I respectfully request that the Commission explain how the project's evolving design and newly disclosed functions have been incorporated into its review; identify any additional consultation or public participation warranted by those changes; and provide substantive responses to unresolved concerns before taking final action. **Once this historic landscape is permanently transformed, no subsequent public hearing, supplemental study, or administrative reconsideration can restore the uninterrupted setting that exists today.**

Alternatives and Specific Requests to the Commission

I support meaningful national commemoration of the United States' 250th anniversary. But a monument honoring our nation should strengthen, not overwhelm, the historic places where Americans already remember leadership, reconciliation, service, and sacrifice. Memorial Circle is not simply an empty space available for construction. Its open landscape and the uninterrupted visual connection between the Lincoln Memorial and Arlington National Cemetery are integral to the historic and symbolic significance of this solemn and sacred setting.

I also urge the Commission to consider whether an alternative location could achieve the project's commemorative purpose while earning broader public support. The substantial opposition expressed to

the Memorial Circle location should not be dismissed as opposition to commemorating our nation's 250th anniversary. Many Americans, myself included, support meaningful national commemoration but believe this particular location is inappropriate. Would it not better serve the nation to identify a site where public consultation demonstrates greater acceptance, where the monument could be welcomed rather than contested, and where its construction would not require the permanent alteration of an already sacred and historically significant landscape? A monument intended to celebrate the American people should, to the greatest extent possible, reflect their participation, their values, and their shared sense of national heritage.

I respectfully request that the Commission withhold final approval; require a single, complete description of the proposed structure and all intended military and security functions; publish independent shadow and nighttime lighting analyses; establish enforceable protections for funerals, cemetery access, and construction activities; disclose transportation, environmental, procurement, operating, and funding details; and meaningfully address the Advisory Council on Historic Preservation's findings and unresolved concerns regarding adverse effects.

I further request that the Commission evaluate and publicly present reasonable alternative locations or substantially less intrusive designs, including their historic, environmental, transportation, security, and financial implications. Public participation should be an integral part of evaluating those alternatives, with meaningful opportunities for Americans to express their views before a permanent location is selected. The degree of public acceptance should be considered alongside the project's other planning and preservation requirements.

I also request realistic, seasonally varied visualizations of ordinary and peak-day operations—not merely idealized architectural renderings. These need to include bus and rideshare queues, pedestrian volumes, barriers, emergency access, potential security closures, and views from Arlington House and the Kennedy gravesite. These visualizations should also account for the proposed structure's nighttime illumination and the reasonably foreseeable infrastructure and operational requirements associated with its newly described military and security functions. Every illustration should clearly distinguish between approved design elements, proposed operational arrangements, reasonable projections, and features that remain speculative.

A national monument should be a place where Americans can come together in remembrance and celebration, not a source of lasting division imposed upon a historic landscape that already holds profound meaning for our nation. I respectfully ask the Commission to protect what cannot be replaced and to consider alternatives that would allow this anniversary to be commemorated in a manner worthy of the American people and the generations who will follow us.

Closing

When Landon and I walked through Arlington together nearly twenty years ago, the landscape itself helped him understand the meaning of service and sacrifice. That experience remains part of his story and mine. The generations buried there, and the families who continue to visit them, deserve a setting in which remembrance remains the central purpose—not a backdrop for spectacle.

There are other places to commemorate our nation’s founding. There is only one Arlington, and only one historic corridor connecting it to the Lincoln Memorial. Please protect this relationship for the generations who will come after us.

Respectfully submitted,

Cynthia Morrison
Raleigh, North Carolina
Gold Star Mother of *Landon Joseph Morrison*
U.S. Air Force and U.S. Space Force Veteran
U.S. Air Force Academy, Class of 2016

Exhibit A - Wildlife at Memorial Circle: Photographic Documentation
Photographs reproduced with the photographer's permission, contact information available upon request.

Figure A-1. Canada geese observed at Memorial Circle, November 2022.



Figure A-2. Canada geese observed at Memorial Circle, August 2024



Exhibit B

An Inventory of 97 Documented and Potential Impacts, Operational Concerns, and Unresolved Questions — Not an Exhaustive List

Important Disclosure: This inventory is not exhaustive. It identifies 97 documented findings and project features, impacts projected in published analyses, military and security functions described in sworn declarations, reasonably foreseeable consequences, and unresolved questions requiring further evaluation. Not every item represents an approved design element, confirmed operational plan, or inevitable outcome. The purpose of this inventory is to illustrate the extraordinary breadth and cumulative nature of the issues that must be thoroughly evaluated and publicly disclosed before final approval.

Historic Preservation, Commemorative Landscape, and Visual Impacts

- Destruction of the intentionally designed historic viewsheds
- Adverse effects on 42 historic properties
- Visual domination of Arlington Memorial Bridge
- Alteration of the Lincoln Memorial–Arlington House ceremonial axis
- Disruption of Arlington National Cemetery's solemn setting
- Shadows across more than 75,000 military graves
- Shadows affecting surrounding national memorials
- Intrusive nighttime illumination
- Light pollution
- Changes to historic landscape design
- Permanent transformation of the memorial landscape
- Loss of the intended openness and tranquility of Memorial Circle

Arlington National Cemetery, Funeral Services, and Visitor Privacy

- Elevated observation deck overlooking military graves and funeral services
- Privacy concerns for grieving families
- Funeral procession delays and disruptions
- Changes to Arlington National Cemetery access
- Changes to cemetery parking garage access
- Heavy equipment near active military funerals
- Emergency access for Arlington National Cemetery itself
- Potential conflicts between emergency vehicle access, security barriers, and funeral processions

Military Functions, Security Infrastructure, and Operational Conflicts

- Military surveillance operations
- Drone and counter-drone operations
- Sniper and armed overwatch positions
- Ammunition and military equipment storage
- Military command-and-control facilities
- Potential National Guard patrols
- Security checkpoints and restricted areas
- Reinforced bollards and vehicle barriers
- Potential concrete security barricades
- Increased security staffing and operating costs
- Potential security lockdowns
- Conflicting civilian and military uses
- Increased terrorism and security-risk considerations
- Potential future expansion of security infrastructure
- Incomplete disclosure of military functions

Transportation, Pedestrian Safety, and Surrounding Neighborhoods

- Permanent changes to Memorial Circle traffic patterns
- Increased traffic congestion
- Vehicle collision and crash risks
- Pedestrian safety concerns
- New signalized pedestrian crossings
- Tour bus congestion
- Taxi and rideshare congestion
- Increased visitor traffic
- Large pedestrian crowds
- Traffic overflow into surrounding roadways and intersections
- Increased congestion in nearby residential neighborhoods
- Cut-through traffic on neighborhood streets
- Disruption to residents and local businesses
- Increased noise and vehicle emissions in surrounding communities
- Spillover parking in surrounding neighborhoods
- Road closures and construction detours

Public Safety, Emergency Services, and Aviation

- Emergency evacuation challenges
- Emergency Medical Services (EMS) response times
- Emergency vehicle access complications
- Potential need for on-site EMS personnel or standby ambulances
- Emergency response to traffic accidents and pedestrian injuries
- Ambulance access during heavy congestion or security lockdowns
- Coordination of emergency services across jurisdictional boundaries
- Emergency medical response and evacuation from the rooftop observation deck
- Accessibility and ADA compliance challenges
- Elevator capacity and emergency egress
- Visitor screening and crowd management
- Aviation warning lights
- FAA and Reagan National Airport safety considerations

Construction, Environmental Effects, and Ecological Resources

- Noise pollution
- Construction noise and vibration
- Years of construction disruption
- Construction-related air pollution
- Excavation and archaeological impacts
- Underground utility relocation
- Stormwater runoff and drainage changes
- Potential flooding concerns
- Impacts on migratory birds
- Wildlife habitat disturbance
- Potomac River environmental impacts
- Loss or alteration of green space
- Environmental review adequacy
- Cumulative impacts of surrounding federal projects

Tourism, Commercial Activity, and Long-Term Operations

- Potential food trucks and street vendors
- Increased commercial activity
- Potential public events and demonstrations
- Permanent transformation of a ceremonial entrance into a tourist destination

- Waste management and sanitation demands
- Maintenance and structural preservation costs
- Long-term security and operational expenses
- Unresolved construction funding questions
- Federal contracting and procurement transparency

Legal Authority, Agency Coordination, and Public Accountability

- Questions about 1925 congressional authorization
- Height of Buildings Act questions
- Historic preservation compliance
- Pending federal litigation
- Public participation and transparency concerns
- Coordination among federal, state, and local agencies
- Conflicts between agency jurisdictions

Incomplete Public Visualizations and Disclosure

- Idealized architectural renderings that do not depict anticipated operational conditions
- Incomplete visualization of traffic, pedestrian crowds, security infrastructure, and military operations
- Lack of realistic simulations showing cumulative impacts on surrounding neighborhoods and cemetery activities

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The central concern is not simply the impact of any one feature. It is the cumulative transformation of a historically significant ceremonial landscape through the combined effects of monumental construction, tourism, transportation changes, security infrastructure, military functions, and long-term operations. These effects deserve comprehensive, transparent evaluation before any irreversible decision is made.

Exhibit C

Proposed Triumphal Arch at Memorial Circle
Illustrative Visualization of Potential Cumulative Visual and Operational Impacts

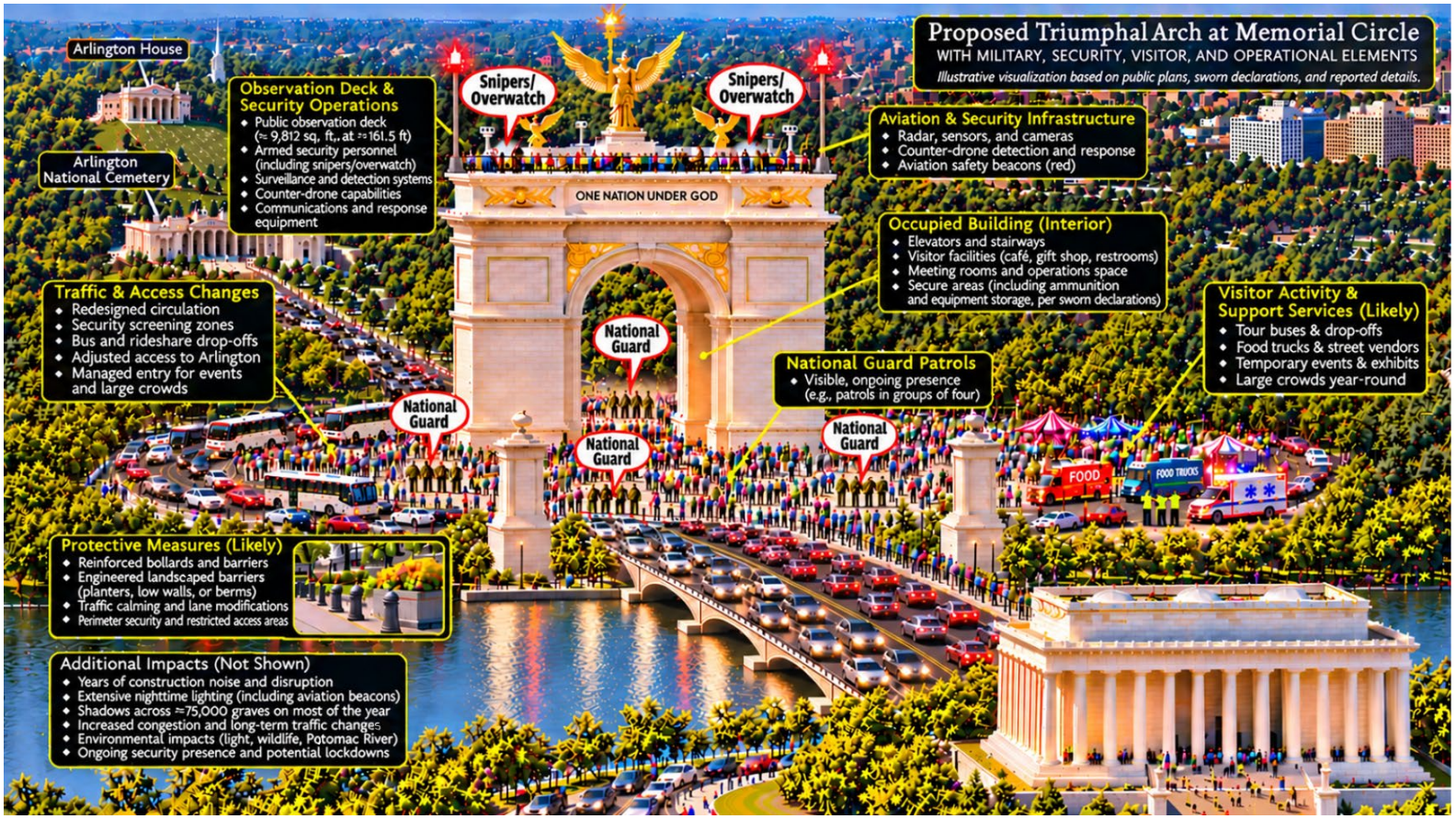
The architectural renderings presented to the public depict a largely serene, orderly setting. However, they do not fully convey how the proposed monument might function as a major tourist destination incorporating public amenities, extensive illumination, transportation changes, security infrastructure, and newly described military functions.

This AI-assisted composite was created to encourage consideration of the broader physical and operational changes that could accompany the project. It illustrates how multiple features and activities, considered together, could fundamentally alter the character of Memorial Circle and its historic relationship with Arlington National Cemetery, Arlington Memorial Bridge, and the Lincoln Memorial.

Important Disclosure: This image is an illustrative, AI-assisted composite, not an official architectural rendering, engineering drawing, or prediction of final conditions. It incorporates a combination of publicly described project features, documented concerns, and hypothetical scenarios intended to illustrate potential cumulative impacts. Not every depicted element has been approved, confirmed, or established as a necessary consequence of the project.

I am not a professional architectural designer or visualization specialist, and I created this illustration using the limited resources available to me as a private citizen. Despite repeated efforts to improve its accuracy, certain limitations remain. In particular, the roadway alignment and connection between Arlington Memorial Bridge and Memorial Circle are not depicted correctly. This is an unintended limitation of the image-generation process, not a proposed or anticipated alteration to the existing roadway configuration. Readers are asked to envision the bridge and circle properly connected as they are in the actual landscape.

The purpose is not to predict precisely what Memorial Circle will look like, but to demonstrate why the public deserves realistic, comprehensive visualizations of the project's full range of foreseeable impacts before final approval.



Principal Sources and Supporting References

NCPC New Monumental Arch (Project No. 8778) | Consolidated and consecutively numbered

1. National Capital Planning Commission — New Monumental Arch, Project No. 8778.
https://www.ncpc.gov/review/project/8778/
Contains the June, July, and November 2026 submissions, architectural plans, renderings, lighting plans, transportation materials, environmental documents, staff reports, and Commission actions. Central primary-source reference.

2. National Park Service — Revised Section 106 Assessment of Effects, August 28, 2026.
https://planning.nps.gov/document.cfm?documentID=153235&parkID=186&projectID=136973
Evaluates effects on historic properties, designed landscapes, viewsheds, and ceremonial relationships between Arlington and Washington.

3. National Park Service — Original Assessment of Effects and Draft Programmatic Agreement, June 2026.
https://planning.nps.gov/document.cfm?documentID=151576
Earlier assessment, supporting maps, historic property tables, and public comment materials; useful for tracing the review.

4. Advisory Council on Historic Preservation — Termination of Section 106 Consultation, September 2026.
https://www.achp.gov/news/achp-announces-termination-section-106-consultation-triumphal-arch-project
Explains preservation concerns and documents identification of 42 historic properties within the Area of Potential Effects.

5. Advisory Council on Historic Preservation — Formal Comments to the Secretary of the Interior, October 2026.
https://www.achp.gov/news/achp-vice-chairman-voyles-sends-triumphal-arch-comment-letter-secretary-interior
Records ACHP recommendations and its role in concluding the Section 106 review process.

6. National Park Service — Environmental Assessment and Finding of No Significant Impact, revised October 9, 2026.
https://parkplanning.nps.gov/document.cfm?documentID=151577
Addresses construction, environmental consequences, alternatives, and environmental significance. A FONSI is not itself final project approval.

7. NCPC — July 9, 2026 Preliminary Approval and Commission Requirements.
https://www.ncpc.gov/news/item/264/1/
Documents requests for additional information on transportation, lighting, aviation, and building height before final review.

8. Arlington National Cemetery — Arlington House Flagpole Illumination: Project Description, Area of Potential Effects, and Assessment of Effect, December 18, 2020.
https://arlingtoncemetery.mil/Portals/0/Docs/Public-Notices/ARHO-Flagpole-Lighting-Public-210103.pdf?ver=2021-01-04-202222-960
Assessment of two spotlights illuminating the Arlington House flagpole, including study area, nighttime photographs, and views toward the Lincoln Memorial.

9. NCPC — November 2026 Architectural Lighting Plan, Project No. 8778.
https://www.ncpc.gov/review/project/8778/
Applicant's proposed architectural illumination and related lighting documentation, available among the November project materials.

10. The Washington Post — "How Trump's arch could disrupt the solemn nighttime of Arlington Cemetery," October 27, 2026.
https://www.washingtonpost.com/style/2026/10/27/how-trumps-arch-could-disrupt-solemn-nighttime-arlington-cemetery/

Independent reporting and criticism on cemetery nighttime character, proposed lighting, and the flagpole review; not an official agency finding.

11. The Washington Post — Independent 3D Shadow Analysis, October 27, 2026.
https://www.washingtonpost.com/investigations/interactive/2026/10/27/trumps-arch-would-cast-shadow-arlington-cemetery/
Interactive projected-shadow modeling for Arlington and memorials east of the Potomac, with methodology and distinctions about duration and visiting hours.

12. NCPC — Height of Buildings Act Justification, November 2026.
https://www.ncpc.gov/review/project/8778/
Applicant's position on building-height restrictions and historical authorization; not a settled judicial determination.

13. The Washington Post — D.C. and Virginia Lawsuit Concerning the Proposed Arch, October 31, 2026.
https://www.washingtonpost.com/dc-md-va/2026/10/31/dc-virginia-sue-block-trumps-proposed-triumphal-arch/
Reporting on challenges involving authorization, preservation, transportation, emergency access, and consolidation; legal claims remain disputed.

14. U.S. District Court for the District of Columbia — Declaration of Pete Hegseth, October 28, 2026.
Lemmon et al. v. Trump et al., Case No. 1:26-cv-00544-TSC, Document 74-9 (7 pages).
https://storage.courtlistener.com/recap/gov.uscourts.dcd.289572/gov.uscourts.dcd.289572.74.9.pdf
Sworn declaration describing the proposed triumphal arch as a dual-purpose national monument and military-security facility. Identifies planned counter-unmanned-aircraft capabilities, military command-and-control functions, communications and surveillance infrastructure, elevated protective-overwatch and counter-sniper positions, and secure storage for equipment, ammunition, and drones. Paragraph 15 asserts that these functions would be integrated into the existing architectural design without structural modifications.

15. WPTV — Air-Defense Systems Deployed Near Mar-a-Lago
Air-defense systems spotted on barge outside Mar-a-Lago as security measures expand
Local reporting documenting expanded federal security measures around Mar-a-Lago, including military air-defense equipment positioned on a barge in the Intracoastal Waterway. Provides a real-world example of how security infrastructure protecting a high-profile facility can extend into surrounding public areas and transportation corridors.

16. The War Zone — Laser Counter-Drone System Protecting Mar-a-Lago
Laser Weapon Now Guarding Trump's Mar-a-Lago Estate
Defense reporting examining the deployment of a laser-based counter-drone system and associated protective capabilities near Mar-a-Lago. Provides additional context for the potential physical and operational footprint of military-security systems beyond the boundaries of a protected facility.

17. Arlington National Cemetery — Official Media Policy
Arlington National Cemetery — Media Policy
Issuing Agency: Arlington National Cemetery, U.S. Department of the Army
Official cemetery guidance governing media access, photography, filming, and respect for grieving families and funeral services. Relevant to concerns that the proposed triumphal arch's elevated observation deck could enable visitors to observe or photograph mourners from outside cemetery grounds, potentially beyond the reach of existing cemetery policies.

18. Arlington National Cemetery — Visitor Tips and Etiquette Guidelines
Arlington National Cemetery — Visitor Tips
Issuing Agency: Arlington National Cemetery, U.S. Department of the Army
Official visitor guidance addressing respectful conduct, funeral services, military honors, and the solemn character of Arlington National Cemetery. Provides a basis for evaluating whether the proposed arch's observation deck, public plaza, events, and visitor activities would be compatible with the dignity and established expectations of conduct associated with this active national cemetery.

19. U.S. Commission of Fine Arts — Meeting Minutes, April 16, 2026.
https://cfa.gov/records-research/record-cfa-actions/2026/04/cfa-meeting/minutes

Official design-review record describing Columbia Island's unfavorable foundation conditions, preliminary piles spaced approximately five feet apart, and a thick concrete mat foundation.

20. U.S. Commission of Fine Arts — Meeting Minutes, May 21, 2026
Commission of Fine Arts — May 21, 2026 Meeting Minutes
Issuing Agency: U.S. Commission of Fine Arts (CFA)
Official meeting record documenting the design review of the proposed triumphal arch, including discussion of geotechnical investigations, subsurface conditions on Columbia Island, and preliminary foundation considerations. Relevant to concerns about the engineering requirements of constructing a massive monument on historically dredged land, including excavation, pile foundations, groundwater conditions, construction methods, and potential effects on surrounding infrastructure.

21. Arlington National Cemetery — Official Funeral Information
Arlington National Cemetery — Funeral Information
Issuing Agency: Arlington National Cemetery, U.S. Department of the Army
Official cemetery information concerning funeral services, scheduling, military honors, and cemetery operations. Provides context for the approximately 24–27 weekday funeral services conducted at Arlington and the importance of coordinating construction activities with an active national cemetery. Relevant to concerns about construction noise, vibration, heavy equipment, traffic, funeral processions, and the uninterrupted conduct of military honors.

22. U.S. House of Representatives — Congressional Record Concerning Arlington National Cemetery Funeral Operations
Congressional Hearing Material — Arlington National Cemetery Funeral Operations (2021)
Issuing Institution: U.S. House of Representatives, Committee on Appropriations
Congressional hearing material providing historical information about Arlington National Cemetery's funeral operations, including approximately five to ten Saturday services. Supports consideration of the potential effects of extended construction schedules on weekend funeral activities. Because this is a historical source, the Saturday figure should not be presented as a verified current schedule without additional confirmation.

23. National Park Service — Memorial Circle Safety Improvements, Finding of No Significant Impact (June 7, 2019)
https://parkplanning.nps.gov/document.cfm?documentID=96231
Official environmental decision documenting an earlier Memorial Circle transportation safety initiative, undertaken years before the proposed arch. Supports the argument that pedestrian, cyclist, and roadway safety improvements have an independent planning history and should not be presented as requiring construction of the monument.

24. National Park Service — Memorial Circle Safety Improvements, News Release (June 13, 2019)
https://www.nps.gov/gwmp/learn/news/national-park-service-completes-plan-to-improve-safety-at-memorial-circle.htm
Official explanation of the National Park Service's earlier plans to improve Memorial Circle through changes to roadway signage, pavement markings, crosswalks, and traffic circulation while protecting the historic character of the ceremonial landscape. Provides accessible historical context for the project's existing safety concerns and earlier alternatives.

25. District of Columbia Department of Licensing and Consumer Protection — DLCP and Partner Agencies Take Action to Protect Consumers on the National Mall (June 2, 2025)
https://dlcp.dc.gov/release/dlcp-and-partner-agencies-take-action-protect-consumers-national-mall
Official District government report documenting a multiagency enforcement operation involving food trucks and street vendors on the National Mall. The operation resulted in 32 food trucks being towed, five junk vehicles removed, and 46 citations issued. The agency identified concerns involving unlicensed vending, sanitation, and overcrowding. Supports the request to evaluate foreseeable commercial activity, parking, enforcement, pedestrian circulation, and sanitation at a major visitor destination.

26. District of Columbia Department of Licensing and Consumer Protection — National Mall Vending Notice (June 26, 2025)
https://dlcp.dc.gov/release/national-mall-vending-notice
Official guidance explaining vending restrictions, licensing requirements, and designated vending areas around the National Mall. Demonstrates that commercial vending in heavily visited public spaces requires explicit operational rules

and enforcement. Supports the request for clear policies governing any future food trucks, souvenir vendors, or mobile concessions at Memorial Circle.

27. Federal Aviation Administration (FAA) — Statement on Washington, D.C., Triumphal Arch Determination (September 18, 2026)
https://www.faa.gov/newsroom/statements/general-statements
Official FAA statement confirming that the proposed triumphal arch was determined not to pose a hazard to aircraft following an aeronautical review of airspace, air traffic patterns, and operations around Ronald Reagan Washington National Airport and nearby military and public-use airports.
The determination includes conditions requiring nonstandard obstruction marking and lighting, specifically an illuminated eternal flame atop the structure and floodlight projectors directed toward the arch to improve its visibility to pilots.
Supports Section 12's discussion of aviation safety, required nighttime illumination, and the need to ensure that the final architectural and lighting plans reviewed by NCPC accurately reflect the FAA's determination.
FAA Aeronautical Study Identification: 2026-AEA-8628-OE.

28. National Capital Planning Commission — New Monumental Arch, Revised Environmental Assessment (November 2026)
https://www.ncpc.gov/files/projects/2026/8778_New_Monumental_Arch_NEPA_Document_-_EA_Nov2026.pdf
Official environmental assessment addressing the proposed arch's environmental effects, including construction activities, soils, groundwater, stormwater management, vegetation, wildlife, lighting, and other environmental considerations.
Supports the discussion of whether the environmental review adequately evaluates seasonal wildlife activity, construction disturbance, subsurface conditions, nighttime illumination, and the cumulative effects of the project's latest design and intended operations.

29. National Park Service — Revised Finding of No Significant Impact, Triumphal Arch Revised Environmental Assessment (2026)
https://www.ncpc.gov/files/projects/2026/8778_New_Monumental_Arch_NEPA_Document_-_Applicant_FONSI_Nov2026.pdf
Official National Park Service document addressing the anticipated environmental impacts of the proposed 250-foot triumphal arch at Memorial Circle, including construction activities, excavation, foundation requirements, stormwater management, transportation changes, visitor operations, lighting, cultural resources, and cumulative environmental effects.
The document states the agency's conclusion that the proposed project would not result in significant environmental impacts, while acknowledging that a separate project decision document and non-impairment determination remain to be completed.
Supports the request that NCPC critically evaluate whether the environmental findings adequately address the project's current design, intended military and security functions, and reasonably foreseeable cumulative impacts before granting final approval.

30. United States Congress — Act of February 24, 1925, Chapter 303, 43 Stat. 974, Arlington Memorial Bridge Authorization
https://www.gao.gov/products/8713
Original congressional authorization for construction of Arlington Memorial Bridge, including its approaches, roadways, and associated landscape features, based on plans submitted to Congress on April 22, 1924. The statutory language is reproduced in an April 3, 1925, decision of the U.S. Comptroller General.
Supports the distinction between the bridge and landscape project authorized by Congress in 1925 and the substantially different monumental structure and military functions proposed in 2026.

31. Society of Architectural Historians — Statement on Proposed Monumental Arch in Memorial Circle in Washington, D.C. (June 2, 2026)
https://sah.org/2026/06/02/sah-statement-on-proposed-monumental-arch-in-memorial-circle-in-washington-dc/
Professional historical analysis examining the McMillan Plan, Arlington Memorial Bridge's original design, the proposed pair

of monumental columns, and the preservation of the historic visual axis between Arlington House and the Lincoln Memorial.

32. National Park Service — Memorial Circle Arch Environmental Assessment and Compliance Services, Federal Contract Award (May 21, 2026)
https://www.governmentcontracts.us/government-contracts/opportunity-details/18993258090500159.htm
Federal contract award notice documenting the National Park Service's May 21, 2026 award to Otak, Inc. for environmental assessment and compliance services associated with the proposed triumphal arch at Memorial Circle.
Task Order: 140P2026F0145
Parent Contract: 140P2022D0020
Reported Award Value: $500,601.42
Supports the discussion of documented preliminary project expenditures, contractor identification, and procurement transparency. This award concerns environmental assessment and compliance services and should not be confused with a construction contract or the total projected cost of the monument.

33. The Washington Post — "White House Planned to Start Triumphal Arch Work Under Unrelated Contract" (May 14, 2026)
https://www.washingtonpost.com/investigations/2026/05/14/trump-officials-okd-use-white-house-contract-begin-triumphal-arch-work/
Investigative reporting by Sarah Blaskey and Jonathan O'Connell examining internal federal communications concerning a proposal to use an existing White House engineering-services contract for preliminary work associated with the triumphal arch.
The reporting describes questions about competitive procurement, contract scope, pricing transparency, and the use of existing contracting arrangements for a project outside the White House complex. It does not establish that the proposed arrangement was ultimately implemented.
Supports the request for disclosure of all project-related contracts, procurement methods, contractor responsibilities, and expenditures before final approval

34. National Park Service — National Desert Storm and Desert Shield Memorial: Project History and Timeline
https://www.nps.gov/dsds/learn/index.htm
Official National Park Service timeline documenting congressional authorization in 2014, site approval in 2018, design approvals through 2022, issuance of a construction permit in March 2025, and dedication on October 24, 2026.
Provides a documented comparison illustrating the extended planning, review, authorization, and construction process followed for another nationally significant memorial.

35. Cynthia Morrison — Written Public Comments Submitted to the Advisory Council on Historic Preservation Regarding the Proposed Triumphal Arch at Memorial Circle (2026)
Written comments submitted to the Advisory Council on Historic Preservation during its consideration of the proposed triumphal arch and its effects on the historic setting of Arlington Memorial Bridge, Memorial Circle, the Lincoln Memorial, and Arlington National Cemetery. Personal correspondence submitted as part of the federal historic-preservation public participation process.
Supporting documentation: Attachment 1 — Original ACHP Written Comments (PDF).

36. Arlington National Cemetery — Memorial Arboretum Walking Tour, John F. Kennedy Gravesite.
https://education.arlingtoncemetery.mil/Portals/2/Memorial%20Arboretum%20Walking%20Tour.pdf
Official cemetery educational material supporting President Kennedy's reported 1963 remark, Jacqueline Kennedy's selection of John Warnecke to design the memorial, and the gravesite's landscape context.

Attachment 1

Prior Written Comments to the Advisory Council on Historic Preservation (ACHP)
Submitted September 29, 2026
The following is a copy of my original written comments submitted to the Advisory Council on Historic Preservation concerning the proposed Triumphal Arch at Memorial Circle (NCPC File No. 8778).
These comments are included as part of the record of my continued participation in the federal review process and to provide additional context for the concerns raised in my November 5, 2026 statement to the National Capital Planning Commission.
A copy of my original submission email, documenting the date of submission, follows the comments.

Comments on the Triumphal Arch at Memorial Circle - submitted 9.29.26

Introduction and National Park Service Findings

My name is Cynthia Morrison, and I am submitting this comment as a concerned citizen and Gold Star Mother regarding the proposed Triumphal Arch at Memorial Circle.

I support the commemoration of our nation's 250th anniversary. My concern is not with commemorating that milestone, but with placing a structure of this extraordinary scale and function within one of the most historically significant and solemn memorial landscapes in the United States.

The National Park Service has determined that this undertaking would adversely affect 42 historic properties, including National Historic Landmarks, historic districts, cultural landscapes, and other historic properties. Among the effects identified by NPS are alterations to character-defining views, vistas, axial relationships, reciprocal sightlines, setting, feeling, association, spatial organization, and design continuity.

Those findings should carry substantial weight in the decision about whether and how this undertaking proceeds.

The Historic Memorial Landscape

Memorial Circle is not an empty parcel of land awaiting a monumental use. It is part of an intentionally designed commemorative landscape connecting the Lincoln Memorial, Arlington Memorial Bridge, Memorial Avenue, Arlington National Cemetery, and Arlington House. The openness, perspective, and reciprocal views within this landscape are themselves historic resources.

The word "Memorial" appears repeatedly throughout this landscape for a reason: the Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, and Memorial Avenue form a deliberate physical and symbolic progression leading to Arlington National Cemetery.

The Kennedy Gravesite and the Historic Visual Axis

The historic significance of this visual relationship is especially evident in the history of President John F. Kennedy's gravesite.

On March 3, 1963, President Kennedy made an unscheduled visit to Arlington House. According to historical accounts, a National Park Service ranger explained to him that Arlington Memorial Bridge had been specifically designed to link Arlington House with the Lincoln Memorial, symbolizing the reunification of the nation after the Civil War and the strength of a reunited Union. Standing on the Arlington hillside and looking across the Potomac at the sweeping view of Washington before him, President Kennedy remarked,
"I could stay here forever."

Eight months later, he was assassinated.



Following President Kennedy's death, Jacqueline Kennedy played a central role in the decision to bury her husband at Arlington National Cemetery. The hillside below Arlington House was selected for his gravesite, along the historic axis between Arlington House and the Lincoln Memorial. Jacqueline Kennedy subsequently worked with architect John Carl Warnecke on the development of the permanent gravesite and memorial landscape. The design was intentionally restrained, allowing the gravesite to become part of the surrounding landscape rather than dominate it. Its low profile, use of natural materials, and integration into the hillside preserved the openness of the setting and the larger visual relationship between Arlington House, the cemetery, and the monumental core of Washington.

This history makes the significance of the view particularly clear. President Kennedy himself stood at Arlington House and was moved by this landscape. Months later, that same landscape became his final resting place. His permanent memorial was then designed within the existing relationship among Arlington House, Memorial Avenue, Arlington Memorial Bridge, the Potomac River, and the Lincoln Memorial.

Contemporary accounts of the permanent memorial explicitly described the Kennedy gravesite as completing the approximately 1.3-mile axis with the Lincoln Memorial across the Potomac.

That view is therefore not incidental scenery. It is part of the history, design, and commemorative meaning of the Kennedy gravesite and of the larger memorial landscape connecting Arlington National Cemetery with the Lincoln Memorial.

Placing a 250-foot monumental structure at Memorial Circle would introduce an unprecedented vertical element directly into that historic axis. It would permanently change a view and spatial relationship that existed before President Kennedy's burial, influenced the design of his gravesite,

and has remained part of the experience of Arlington for more than six decades.

Rather than becoming part of this carefully composed memorial landscape, a structure of this scale, height, and location would visually dominate it.

Transforming Memorial Circle into a Visitor Destination

The proposed undertaking would also fundamentally change how Memorial Circle functions and how this historic landscape is experienced.

This is not simply a freestanding commemorative arch through which people would pass. The project documents describe a substantial visitor destination. The structure would contain security screening and lobby areas, multiple elevators and stairways, exhibition and gallery space, a potential café and gift shop, and an exterior observation deck.

Memorial Circle itself would be substantially developed as a paved public plaza, with security barriers and bollards, surveillance and access-control systems, utilities, significant lighting, and permanent modifications to pedestrian and vehicular circulation.

All of this is proposed for the center of Memorial Circle, an existing traffic circle at the ceremonial entrance to Arlington National Cemetery. Rather than remaining an open component of the ceremonial approach to Arlington, the center of the circle would become a destination that visitors would be expected to enter, occupy, and remain within.

These features matter when evaluating effects on the historic landscape. Visitors would have to reach this destination within an already complex transportation corridor. The resulting pedestrian activity, vehicle traffic, tour buses and other transportation demands, security operations, crossings, queuing, and general visitor activity would fundamentally change how Memorial Circle functions and is experienced.

Arlington County has already raised concerns about the increased multimodal traffic anticipated from the project, including pedestrian safety, parking, and traffic circulation.

Nighttime Effects on the Memorial Landscape

The effect would continue after sunset. Another important consideration is the preservation of Arlington's nighttime character. Arlington National Cemetery limits nighttime visitor activity, and its parking facility closes promptly at 6 p.m., one hour after the cemetery closes, rather than operating as a continuous public destination.

This restraint is consistent with the solemn character of Arlington as a place of remembrance. After hours, the darkness, quiet, and visual openness are themselves important elements of the experience and character of this landscape.

The proposed Arch would introduce a fundamentally different nighttime presence. The undertaking includes extensive exterior and interior lighting, and the Federal Aviation Administration has required conspicuous nighttime illumination of the structure for aviation visibility. A structure approximately 250 feet tall, illuminated at night and occupied by visitors using an observation deck and other

amenities, along with security systems and ongoing operations, would introduce an entirely different intensity of activity into this landscape.
This raises significant questions about effects on the nighttime setting, feeling, association, visual continuity, and solemn character of Arlington National Cemetery and the surrounding memorial corridor.

Construction and Arlington's Funeral Operations

The construction required to create that destination would itself be extraordinary. Current plans contemplate construction for approximately two to three years, potentially operating as much as 20 hours per day, year-round, with major construction equipment and cranes reaching substantially higher than the completed structure.

Project officials have indicated that construction activities would be modified or mitigated to avoid disrupting funerals at Arlington National Cemetery. Yet Arlington conducts 24 to 27 funeral services every weekday, between 9 a.m. and 3 p.m., with as many as six committal services in a single hour. Given that schedule, it is difficult to understand how construction of this duration and intensity could be meaningfully modified around funeral services without either repeatedly interrupting construction or subjecting grieving families and funeral processions to substantial construction activity.

It is difficult to fathom all of this occurring immediately adjacent to Arlington National Cemetery, which is not simply a historic site preserved as a place from the past, but a living place of remembrance where families continue to bury and visit those they love and where Americans come to remember generations of service and sacrifice. The character of this landscape therefore has a continuing human purpose. Quiet, dignity, openness, perspective, and solemn reflection matter here.

The Observation Deck, Privacy, and Dignity

The proposed observation deck introduces an additional and deeply concerning dimension to the impact of this undertaking. Unlike a traditional memorial structure experienced from the ground, an elevated observation deck would place visitors at a vantage point overlooking the surrounding landscape, including portions of Arlington National Cemetery where private ceremonies of mourning and remembrance take place.

Arlington is not a scenic backdrop or a tourist attraction. Creating an elevated visitor experience that allows tourists to look down upon an active national cemetery raises fundamental questions about privacy, dignity, and the appropriate relationship between public access and sacred space. Those concerns are not theoretical. Families conducting funerals below could potentially find themselves within the view of visitors on the observation deck, where they could be photographed or recorded during some of the most private and vulnerable moments of their lives. The possibility that images or video of a family's final farewell could subsequently appear on social media only deepens the concern.

A place of national remembrance should not require grieving families to become part of the view.

The question therefore is not simply whether a 250-foot arch can physically fit within Memorial Circle. The question is what Memorial Circle, and the larger memorial corridor connecting the

Lincoln Memorial and Arlington National Cemetery, would become once a monumental, brightly illuminated, heavily visited destination of this scale and intensity is placed at its center.

Newly Announced Military Functions and the Scope of the Undertaking

I am also deeply concerned by the recently announced proposal to incorporate operational military functions into the Triumphal Arch, including the storage and rapid deployment of drones, sniper positions on the roof and plaza areas, and the storage of sniper ammunition.

The undertaking described in the Section 106 record appears to have been evaluated principally as a monumental structure and visitor destination with associated security, transportation, utility, plaza, and landscape infrastructure. The newly announced military functions raise an important question: Is the undertaking now being publicly described materially different from the undertaking whose effects were evaluated during Section 106 consultation?

If the purpose, operation, security requirements, access controls, infrastructure, or physical characteristics of the undertaking have changed, those changes and their effects on historic properties should be fully evaluated before irreversible action occurs.

They also raise practical questions about how an operational military facility requiring heightened security could coexist with public pedestrian and vehicle circulation, funeral processions, visitors to Arlington National Cemetery, tourists, and the ceremonial function of Memorial Circle.

Why Arlington's Character Still Matters

As a Gold Star Mother, Arlington is not simply a historic site to me. It represents a promise our country makes to those who serve and to the families who carry their memory forward.
My son, Landon, visited Arlington National Cemetery during his formative years. Standing among the rows of headstones and reflecting on the men and women laid to rest there, he made a deliberate decision that he, too, wanted to serve our country. That commitment shaped the course of his life. He attended the United States Air Force Academy and went on to serve as an officer in both the United States Air Force and the United States Space Force.

I share this because Arlington's significance is not confined to the past. The experience of standing in that landscape, amid its openness, its solemnity, the seemingly endless rows of headstones, and the visible reminders of generations of service and sacrifice, continues to shape those who visit it. For my son, that experience helped shape his sense of purpose and his commitment to serve our country.

I understand deeply why places devoted to honoring service and sacrifice deserve exceptional care, and why the character of Arlington and the historic landscape surrounding it should be protected for the generations who will stand there after us.

Request to the Advisory Council on Historic Preservation

Section 106 exists because some changes to historic places cannot be undone once they occur. Consultation should be meaningful, and avoidance of harm should be seriously considered,

particularly when the federal government itself has determined that this undertaking will adversely affect dozens of nationally significant historic resources.

I am also concerned that the public was given only a few business days following the termination of consultation to submit comments on an undertaking of this magnitude and national significance. A project that would permanently alter dozens of historic properties and one of the nation's most important commemorative landscapes warrants meaningful opportunity for public review and participation.

I respectfully ask the Advisory Council on Historic Preservation, in its comments to the Secretary of the Interior, to give substantial weight to NPS's documented adverse-effect findings; the concerns raised by consulting parties regarding avoidance, minimization, and mitigation; the protection afforded to National Historic Landmarks under Section 110(f); and the newly announced addition of operational military functions, including the storage and rapid deployment of drones, sniper positions on the roof and plaza areas, and the storage of sniper ammunition, that do not appear to have been part of the undertaking evaluated during the Section 106 consultation.

Most importantly, I ask that the federal government seriously consider an alternative location.

Our nation can commemorate its 250th anniversary without permanently altering the historic and commemorative relationship between the Lincoln Memorial and Arlington National Cemetery.

The open landscape itself is part of the memorial.
Its meaning is conveyed through openness, perspective, continuity, and reflection.
Once that relationship is fundamentally altered, it cannot truly be restored.

Please protect it.

Respectfully,
Cynthia Morrison, Raleigh, NC
Gold Star Mother of Landon Joseph Morrison
United States Air Force & United States Space Force Veteran
United States Air Force Academy, Class of 2016

Comment on the Triumphal Arch at Memorial Circle

From: Morrison (rockyriverstables@yahoo.com)

To: jloichinger@achp.gov

Bcc: rockyriverstables@gmail.com; rockyriverstables@yahoo.com; gary.e.langston.jr@gmail.com

Date: Tuesday, September 29, 2026 at 08:16 PM EDT

Dear Ms. Loichinger,

Please accept the following comments regarding the proposed Triumphal Arch at Memorial Circle for consideration by the Advisory Council on Historic Preservation. I have also attached a PDF copy of my comments for the record.

Introduction and National Park Service Findings

My name is Cynthia Morrison and I am submitting this comment as a concerned citizen and Gold Star Mother regarding the proposed Triumphal Arch at Memorial Circle.

I support the commemoration of our nation's 250th anniversary. My concern is not with commemorating that milestone, but with placing a structure of this extraordinary scale and function within one of the most historically significant and solemn memorial landscapes in the United States.

The National Park Service has determined that this undertaking would adversely affect 42 historic properties, including National Historic Landmarks, historic districts, cultural landscapes, and other historic properties. Among the effects identified by NPS are alterations to character-defining views, vistas, axial relationships, reciprocal sightlines, setting, feeling, association, spatial organization, and design continuity.

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Request to the Advisory Council on Historic Preservation

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I am also concerned that the public was given only a few business days following the termination of consultation to submit comments on an undertaking of this magnitude and national significance. A project that would permanently alter dozens of historic properties and one of the nation's most important commemorative landscapes warrants meaningful opportunity for public review and participation.

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Respectfully,
Cynthia Morrison
Gold Star Mother of Landon Joseph Morrison
United States Air Force & United States Space Force Veteran
United States Air Force Academy, Class of 2016



Cynthia Morrrison ACHP Public Comment - Triumphal Arch - September 2026.pdf
215.2

Attachment 2 — July 9, 2026 Statement to the National Capital Planning Commission

This attachment contains my original written statement prepared for the NCPC's July 9, 2026 public meeting concerning the proposed Triumphal Arch at Memorial Circle (NCPC File No. 8778).

Although I addressed the Commission during that meeting, I did not separately submit the complete written statement at that time because I was unfamiliar with the submission procedures. I did bring a hardcopy and left it with the commission.

I am including it now to provide a more complete record of my participation and to document the concerns I raised earlier in the review process. My November 5, 2026 written statement builds upon those concerns and incorporates additional research and developments that have emerged since July.

Written Statement to the National Capital Planning Commission for 7/9/26 Meeting

My name is Cynthia Morrison, and I am a resident of North Carolina.
I submit this statement in my capacity as a citizen and as a Gold Star mother.

My perspective comes from generations of service. My father served our country, my grandfather served, and my uncles on both sides of my family served as well. Service, sacrifice, and honoring those who wear the uniform have always been part of my family's story.

My son, Landon Joseph Morrison, carried forward that tradition. He was a graduate of the United States Air Force Academy and served honorably in both the United States Air Force and the United States Space Force. Tragically, he passed last July from what was determined to be 100% service-connected condition.

For me, honoring those who serve is not an abstract idea… it is part of my family's history and my lived experience. Landon's service, and the service of so many like him, is part of why I feel a responsibility to speak on matters involving our nation's memorial landscapes.

I wish to state at the outset that I am not opposed to commemorating the 250th anniversary of the United States, nor to the creation of meaningful memorials honoring our nation's history. My concern is not with commemoration itself, but with this specific proposal… particularly its location, scale, and impact on an existing historic memorial corridor.

The open space between the Lincoln Memorial and Arlington National Cemetery is not vacant or incidental land. It is a deliberately designed and historically significant memorial vista.

That unobstructed corridor was intended to create a direct visual and symbolic relationship between President Lincoln's leadership in preserving the Union and the immense human cost

represented by those interred at Arlington National Cemetery.

This landscape functions through restraint. Its meaning is conveyed through openness, perspective, and continuity rather than through built structure.

In my understanding, the absence of a monument in this corridor is itself an intentional and essential part of its commemorative design.

From a personal perspective, this landscape carries profound meaning.

When I travel to Washington, D.C., and cross Arlington Memorial Bridge between the Lincoln Memorial and Arlington National Cemetery, I am reminded that this is not simply a crossing between two points in our nation's capital. It is part of a carefully designed memorial landscape, created to connect these two sacred spaces.

Whether looking toward Arlington from the Lincoln Memorial side or looking back toward the Lincoln Memorial from Arlington, the unobstructed vista creates a powerful visual and symbolic relationship between leadership, history, service, and sacrifice. The bridge and the landscape surrounding it were intentionally designed to link the ideals of unity and national purpose represented by Lincoln with the profound reality of service, loss, and remembrance represented by those laid to rest at Arlington.

I have walked those grounds with my son at a formative time in his life, including a visit in which we observed the changing of the guard at the Tomb of the Unknown Soldier. We stood among the rows of headstones and reflected on the meaning of service and sacrifice.

Even after that experience, he chose to serve his country.

For me, that view toward Arlington is not merely visual.
It is symbolic.
It represents remembrance, continuity, and the lived reality of military service and loss.

It is for this reason that I am concerned that introducing a large triumphal arch into this setting would fundamentally alter the character of this memorial corridor.

Such a structure would likely shift the visual and symbolic focus of the landscape away from Arlington National Cemetery itself and toward the monument.

In doing so, it would change the balance between reflection and structure that currently defines the experience of this space.

I respectfully request that the Commission consider not only the intent of the proposed structure, but also the existing historic and commemorative framework into which it would be

placed.

Some landscapes derive their meaning not from what is added to them, but from what has been intentionally left undisturbed.

Thank you for your consideration of my comments.

Respectfully submitted,
Cynthia Morrison
Raleigh, NC

CULTURAL HERITAGE PARTNERS
LAW • POLICY • STRATEGY

November 4, 2026

National Capital Planning Commission
401 9th Street NW
Washington, DC 20004

Re: Opposition to Triumphal Arch at Memorial Circle

Dear Commissioners:

Cultural Heritage Partners, PLLC, strongly opposes the proposed Triumphal Arch at Memorial Circle. The project would fundamentally alter one of the Nation's most significant commemorative landscapes and permanently disrupt historic views and axial relationships connecting the Lincoln Memorial, Arlington Memorial Bridge, and Arlington National Cemetery. It would introduce a massive new structure into a landscape whose design and meaning depend on its carefully preserved openness and monumental scale. The Arch is not an appropriate addition to this setting, and the Commission should reject the proposal.

The Arch Would Irreparably Damage a Nationally Significant Historic Landscape

Memorial Circle sits at the ceremonial entrance to Arlington National Cemetery, connecting Arlington Memorial Bridge to Memorial Avenue and the cemetery beyond. The Arch would occupy the axis between the Lincoln Memorial and Arlington National Cemetery, obstructing a historic line of sight that has existed for nearly a century. These are not incidental views. They are defining elements of the monumental core of Washington, D.C., and of the symbolic relationship between the Nation's capital and its most hallowed military cemetery. The Arch would intrude upon this established commemorative landscape, compete with existing memorials and fundamentally change the experience of approaching the cemetery. Its effects would extend well beyond its physical footprint, diminishing the historic setting, feeling, association, and visual relationships that give these places their meaning.

The National Park Service's own Assessment of Effects identified adverse effects to 42 historic properties, including six National Historic Landmarks, eight historic districts, and eight cultural landscapes. Those adverse effects include introducing a prominent new vertical element into nationally significant historic landscapes; altering character-defining views, vistas, axial relationships, and reciprocal sightlines; changing historic circulation patterns and contributing landscape features at Memorial Circle and Memorial Avenue; and introducing nighttime visual effects through illumination. These are not minor or speculative impacts. They go to the heart of what makes these historic properties nationally significant.

The Project's Purpose and Scope Remain Unsettled

The Administration continues to describe the Arch project in materially different terms—sometimes as a commemorative arch, and sometimes as a military installation. The National Park Service initially presented the project as a commemorative and decorative arch. The President subsequently described it as serving a military purpose, including facilities for drones, snipers, and ammunition. The Administration has since doubled down on that military purpose and submitted a declaration from Secretary Hegseth in opposition to the motion for a preliminary injunction in the Arch litigation. This military use is a fundamental change in the proposed structure's purpose, use, design, security requirements, and potential effects.

The Commission should not evaluate or approve a project based on an incomplete or outdated description of actual project plans. The public and reviewing agencies need a clear understanding of the undertaking, including its final design, dimensions, operational functions, security infrastructure, and associated site improvements. Without that information, the Commission cannot meaningfully evaluate the project's full impacts on the monumental core and surrounding historic properties.

The Commission Must Consider Historic Preservation Impacts

The National Historic Preservation Act ("NHPA") reflects Congress's determination that the federal government must account for the effects of its actions on historic properties. The proposed Arch presents precisely the kind of undertaking that warrants careful, transparent, and comprehensive review. The National Park Service has already identified adverse effects to dozens of historic properties, including multiple National Historic Landmarks. Moreover, Section 110(f) of the NHPA requires federal agencies to undertake, to the maximum extent possible, planning and actions necessary to minimize harm to National Historic Landmarks that may be directly and adversely affected.

The Commission, as a federal agency, must comply with the NHPA. Section 106 requires federal agencies to take into account the effects of an undertaking on historic properties and afford the Advisory Council on Historic Preservation and the public a meaningful opportunity to comment. These are mandatory obligations, not discretionary considerations. The fundamental problem is the location and scale of the proposed structure. A monumental arch inserted into Memorial Circle would permanently alter the historic landscape and its defining views and relationships. No mitigation can restore the unobstructed axis or undo the introduction of a competing monumental structure into this carefully designed commemorative setting. The project's acknowledged impacts, the number and significance of affected historic properties, and the continuing uncertainty surrounding its design and military purpose demand more than an abbreviated or piecemeal review. NCPC has not fulfilled its obligations under NHPA with respect to the proposed Arch.

The Commission Should Reject the Proposed Arch

The monumental core of Washington, D.C. is not an empty canvas for new construction. Memorial Circle and Memorial Avenue are integral parts of that design, and the proposed Arch would disrupt the relationships among the memorials, diminish the setting of Arlington National Cemetery, and permanently alter a historic landscape that belongs to the American public. The Commission has both the opportunity and the responsibility to protect the integrity of this nationally significant landscape. We

urge NCPC to reject the proposed Triumphal Arch and any associated site improvements that would compromise the historic character and commemorative purpose of Memorial Circle.

Respectfully submitted,



Marion Werkheiser
Managing Partner

Oral and Written Testimony of Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer of the American Society of Landscape Architects
Before the National Capitol Planning Commission
On the United States Department of the Interior, Memorial Avenue, Washington, DC – New Monumental Arch (NCPC File Number 8778)
November 5, 2026

Good afternoon, Chairman and members of the Commission.

My name is Torey Carter-Conneen, and I serve as Chief Executive Officer of the American Society of Landscape Architects, also known as ASLA. ASLA represents more than 17,000 landscape architects who plan and design infrastructure projects nationwide.

Thank you for the opportunity to testify today.

ASLA strongly opposes the proposed Triumphal Arch at Memorial Circle and respectfully urges the Commission not to approve the final site and building plans.

This project would permanently alter one of our nation's most significant historic landscapes, disrupt important viewsheds, and diminish the historic relationships connecting Arlington National Cemetery to the monumental core of Washington, D.C.

These impacts are not speculative.

Recently, the National Park Service, through its own review, formally identified adverse effects on historic properties associated with the proposed arch.[1]

NPS identified 42 historic properties within the project's area of potential effects, including six National Historic Landmarks and eight cultural landscapes. Its assessment determined that the proposed arch would adversely affect nationally significant historic resources.

These include Arlington National Cemetery, Arlington Memorial Bridge, Arlington House, the Lincoln Memorial Cultural Landscape, and the National Mall Historic District.

[1] National Park Service, *Triumphal Arch Assessment of Effect (Revised)*, August 28, 2026, https://parkplanning.nps.gov/document.cfm?documentID=153235.

As you know, the National Historic Preservation Act establishes a clear responsibility for federal agencies to consider the effects of their actions on historic properties. Section 106 requires meaningful consideration of adverse effects, while Section 110(f) establishes a heightened responsibility to minimize harm to National Historic Landmarks to the maximum extent possible.[2]

These protections are particularly important for a project of this scale and significance.

As recently as September 24, the Advisory Council on Historic Preservation abruptly terminated consultation on the proposed Section 106 agreement, acknowledging significant public concerns about the project.[3]

This history alone should give the Commission pause as it considers final approval.

For many, including the landscape architecture community, the Memorial Avenue Corridor is far more than a roadway or a collection of monuments. It is a carefully designed commemorative landscape where open space, sightlines, and visual connections are essential to its historic character.

Siting memorials in public spaces should be done with careful and deliberate review to help ensure the preservation of the public realm, respect for the significance of the proposed memorial, and its relationship to any existing memorials.[4]

The proposed 250-foot arch would introduce a massive structure into this setting, permanently interrupting the visual relationships between Arlington National Cemetery, Arlington Memorial Bridge, and the Lincoln Memorial.

Viewsheds are not simply aesthetic features. They are defining elements of historic landscapes that shape how people experience and understand these important places.

And once these views are lost, they cannot be fully restored.

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[2] National Historic Preservation Act of 1966, Pub. L. No. 89-665, § 106, 80 Stat. 915, 917 (1966) (codified as amended at 54 U.S.C. § 306108). https://uscode.house.gov/us/usc/119-120/t54/s306108

[3] Advisory Council on Historic Preservation, "ACHP Announces Termination of Section 106 Consultation on Triumphal Arch Project," September 24, 2026. https://www.achp.gov/news/achp-announces-termination-section-106-consultation-triumphal-arch-project

[4] American Society of Landscape Architects (ASLA), Memorials, Public Policy Statement (2018). https://www.asla.org/getcontentasset/635ab5c2-891f-4a64-8c38-8b7ac8a4b5ae/547f34a1-c94b-4748-b717-f9bca7683a68/memorials_2018.pdf

NPS's own assessment acknowledges that the submitted plans do not eliminate its adverse effects.[5] ASLA also believes the plans do not fully address the historic viewsheds and spatial relationships that would be altered by the proposed arch.

Landscape architects recognize that thoughtful design is not always about what we build—sometimes, it is about understanding what should remain untouched.

Washington's monumental landscape is a shared national treasure, shaped by generations of careful planning and stewardship. Its historic views, open spaces, and visual relationships deserve protection just as much as the monuments themselves.

ASLA urges the Commission to look beyond the proposed design and consider what its approval would mean for the long-term preservation and stewardship of our nation's capital.

The question before this Commission is not simply whether this arch can be built. It is whether it should be built at the expense of a historic place that is treasured and belongs to all Americans.

We urge you to choose protecting America's history and cultural heritage.

ASLA respectfully urges you to reject the request for approval of the final site and building plans for the proposed Triumphal Arch.

Thank you for your consideration.



Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer
American Society of Landscape Architects

About ASLA: Founded in 1899, the American Society of Landscape Architects (ASLA) is the professional association for landscape architects in the United States, representing more than 17,000 members. Landscape architects lead the planning, design, and stewardship of healthy, equitable, safe, and resilient environments.

[5] National Park Service, Triumphal Arch at Memorial Circle: Assessment of Effects Report (Revised), August 2026, p. 37, "Minimization and Mitigation." https://planning.nps.gov/showFile.cfm?projectID=136973&sfid=862935