

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

Susan Douglas comments to NCPC Meeting July 9, 2026 in re: Triumphal Arch

Good afternoon, Chairman Scharf and fellow Commissioners.

In June, I voiced concern about the Arch and its disregard for the historical viewshed, the disrespect it would convey to those who fought for our country, traffic issues at Memorial Circle, FAA concerns about local air safety, and a pending lawsuit and Congressional bill, both intended to stop construction of the Arch.

Today I have two concerns: construction of the Arch requires Congressional approval, and the National Environmental Policy Act (NEPA) must be carefully considered.

We have just celebrated the 250th anniversary of our independence which was secured and has been sustained by the U.S. Constitution since 1787. It is the supreme law of the land and serves as the foundation for our legal system.

Article IV, Section 3, Clause 2 of the Constitution states in part:

“The Congress shall have power to dispose of and make all needful rules and regulations respecting the territory or other property belonging to the United States...”

Known as the Property Clause, it grants Congress **supreme authority** over these assets. Simply put, Congress decides whether, where, when and what kind of monument may be built on federal land.

Memorial Circle is administered by the National Park Service. It is federal land and falls under the jurisdiction of the Property Clause of the US Constitution. **Approval for building on this land rests solely with Congress.**

Trump’s assertion that he does not need Congressional approval for the Arch is absurd. He is relying on Congressional authorization granted in 1925 for two pillars that were never built and bear no resemblance whatsoever in size, scope, or style, to the proposed Arch. This 100-year-old authorization provides no legal standing given updated federal laws and review processes.

At your June meeting, you agreed that NEPA requires you to assess the environmental effects of the Arch before rendering a decision.

The NEPA process provides for public review and comment on any significant impact on the human environment resulting from the Arch, to include Human Relevance – in other words any direct or indirect threat or harm to **cultural resources**.

The Arch is a direct threat to the historic and cultural significance of the viewshed between Arlington National Cemetery and the Lincoln Memorial. That viewshed symbolizes the reunification of the North and South following the Civil War. This is our history, and it must not be re-written.

Memorial Circle is an open and reflective space which commands the solemnity owed to the hallowed grounds where over 40,000 soldiers and their family members are buried. This peaceful space is a cultural resource and must be preserved. The Arch would directly harm those for whom this space is sacred.

Public comments provided to CFA, NCPC, and NPS have been overwhelmingly opposed to the Arch for this very reason – harm to human relevance.

- Over 1,600 written comments were sent to the CFA, and 99.8% were opposed.
- You received nearly 2,000 written comments between this meeting and the last – and the vast majority are strongly opposed. All in-person comments at the last meeting were opposed.
- During a recent public comment period provided by the National Park Service, 100,936 comments were submitted. NPS conducted a rigorous AI review of the comments and the summary is replete with opposition and little support for the Arch.

The people have spoken. We do not want this Arch built at Memorial Circle, sacred ground for Arlington National Cemetery and part of the historically significant view from the Cemetery to the Lincoln Memorial.

The Preamble to the Constitution begins with three iconic words: “We the People.”

Those all-important words symbolize the foundation of American democracy and the power of its citizens to govern themselves. I urge you to listen to and respect the wishes of the people and to acknowledge that Congress has the final word in this matter.

SOCIETY OF
ARCHITECTURAL
HISTORIANS

July 7, 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 July 9, 2026, meeting, the National Capital Planning Commission (NCPC) is scheduled to vote on the preliminary and final 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. All project information submitted to date overwhelmingly indicates that the Arch will have detrimental impacts on numerous highly important cultural and natural resources in the area. SAH voiced its concerns via written and oral testimony at the concept review stage of this project in June 2026.¹ Many of these concerns were echoed by your own NCPC staff report at the time.² Despite any substantive improvements to the concept design, the applicant has submitted their plans for preliminary and final approval in less than a month. We ask that NCPC vote **not to approve** this project and offer the following reasons for our determination:

1. The Assessment of Effects Report submitted by the applicant as part of the Section 106 process, determines a finding of **“adverse effects” to a large number of cultural resources**.³ These include both direct and indirect effects to resources designated on the National Historic Landmarks and National Register of Historic Places lists, such as the Arlington Memorial Bridge, Arlington National Cemetery, Arlington House and many others. As indicated by the proposal and confirmed by the Report, direct effects would cause a significant impact to the Arlington Memorial Bridge such that its integrity would be irreparably harmed. The Report confirms that the proposed Arch will create a visual “intrusion” that will substantially detract from the historic integrity of contributing elements and undermine the whole historic landscape. Negative impacts to such a large number of resources that are cumulatively considerable such as these, should trigger a serious reconsideration of the entire project. Moreover, as pointed out by Section 106 comments from the District of Columbia Historic Preservation Office (DC HPO), Virginia Department of Historic Resources (VDHR), and the National Historic Landmarks (NHL) Program, the applicant has missed many impacted cultural resources.⁴ This means two things—first, the applicant’s assessments are woefully incomplete, and second the harmful impacts of the project are even more substantial than currently known.

2. This project **does not stem from any critical public needs** such as transportation, safety, etc., but simply from an Executive Order (EO 14252) that seeks to broadly promote “beautification” in the nation’s capital.⁵ This beautification should not come at the cost of irreparably harming our existing national historic properties and heritage landscapes. Importantly, the EO also calls for “preservation of our history and heritage,” which this project runs counter to.
3. When proposed projects would cause adverse effects to cultural resources, Federal agencies are required to develop and evaluate alternatives or modifications that could avoid, minimize or mitigate those effects. This is a key component of the Section 106 process. Yet, the applicant simply states that the only alternative considered was one with various “smaller Arch heights,” which was ultimately rejected as it more fully obstructed the view.⁶ This **exploration of alternatives is seriously inadequate**. Where is the assessment of other sites/locations, or non-arch designs for the monument? Especially for an undertaking where so many historic resources are harmed, the applicant should explore and present a robust slate of alternatives that will have fewer adverse effects, such as the SHPOs recommendation to change the proposed location to the traffic circle on South Capitol Street between Nationals Park and Audi Field.
4. The applicant has also submitted a draft Programmatic Agreement (PA) between consulting parties to resolve adverse impacts.⁷ This **PA seems ill-suited, premature and ineffective**. PAs are appropriate for large evolving projects where, *by necessity*, there are forthcoming design issues associated with an iterative process, and/or unknown resources such as subsurface archaeology that would be impractical to evaluate during project planning phases. No such situation exists here, as the project is well defined (construction of a single monument with a known design). NPS should instead plan to execute a Memorandum of Agreement (MOA) with specific pre-established mitigation measures for each historic resource that is adversely affected. This should be done *after* and not *before* consulting parties and public comments have been received, reviewed, and meaningfully considered. Finally, the mitigation methods/processes proposed in the PA are unlikely to minimize the adverse effects of the proposed project, thus rendering them useless.
5. The required Section 106, NEPA and other **consultations have been rushed and perfunctory**. The Section 106 consulting parties and the public were given a mere 10 calendar days to provide comments on a nationally important project with such substantial adverse effects. The District of Columbia Historic Preservation Office (DC HPO) and Virginia Department of Historic Resources (VDHR) both object to this fast-tracking and maintain that it is insufficient to do a reasonable and accurate review. Many other relevant cultural organizations that requested consulting party status were not allowed/invited to comment as part of Section 106. The Environmental Assessment (EA) for National Environmental Policy Act (NEPA) compliance, prepared by the applicant, conveniently issued a “Finding of No Significant Impact,” while admitting that the proposal obstructs key historic views along Memorial Avenue, Memorial Circle, and the broader axial relationship between the Lincoln Memorial, Arlington House and Arlington National Cemetery.⁸
6. The environmental review must be efficient, effective and inclusive of all federal requirements at the outset of the process to **minimize duplicative effort and wasted taxpayer dollars**. As such, analysis under section 4(f) of the US Department of Transportation Act of 1966 is still an outstanding concern. Several USDOT agencies have been involved at various levels of planning and approval for this project, including a required Federal Aviation Administration (FAA) permit (due to its extraordinary height and proximity to flight paths for Ronald Reagan National Airport), and Federal Highway Administration (FHWA) involvement (as the project sits along George Washington Memorial Parkway and includes traffic studies performed by the Volpe National Transportation Systems Center). Therefore, we believe the project still requires Section 4(f) analysis and a satisfactory determination that no feasible and prudent alternative to this proposal exists, that avoids all Section 4(f) properties including historic as well as natural and recreational resources. If, and only if, it is found that no alternative exists, then the project must include all possible planning to minimize harm to such resources, further reinforcing the need for a more thorough section 106 analysis with required stakeholder input as has been enumerated above.

7. The proposal continues to have **various unresolved functional issues** related to traffic, pedestrian safety, stormwater management, lighting, aviation compliance, etc. that should be addressed before pushing this design to final approval.⁹

The U.S. has a long and fine tradition of public debate over the meaning and form of monuments in Washington, D.C.¹⁰ From the rejection of Horatio Greenough's 1841 sculpture depicting George Washington as a Roman emperor to the long, deliberative process that led to the 2004 World War II memorial, Americans have fostered a culture of debate and open-ended public participation. The public design competition for the Vietnam Veterans Memorial brought more than 1400 entries, and Maya Lin's winning entry went through multiple iterations before becoming one of the most beloved and imitated memorials in the world. Landscape architect Lawrence Halprin won the competition to design the Franklin Delano Roosevelt Memorial in 1974 and it was not dedicated until 1997, more than 40 years after the idea of the memorial was first proposed. While these long timelines do provoke frustration, they also ensure results of which we can be proud. The U.S. does not rush decisions about additions and changes to our memorial landscape, and we welcome broad public input. We change ideas when they are bad and reject memorials that are not timely. These deliberative processes reflect our democratic ideals and ensure broad consensus.

We urge you to do the same—reject this hasty and inappropriate proposal, respect public opinion, and engage in a deliberative design process to ensure we end up with a fitting memorial for America's Semiquincentennial.

Sincerely,



Priya Jain, AIA

Chair, Society of Architectural Historians (SAH) Heritage Conservation Committee

Members, SAH Heritage Conservation Committee: Fallon Samuels Aidoo, Ph.D.; Kenneth Breisch, Ph.D., Kathryn E. Holliday, Ph.D., Margarita Jerabek, Ph.D., Daniel Leckie, PMP, Mary Rzepczynski, Shuyi Yin, Ph.D., Günce Uzgören, Ph.D. Swati Chattopadhyay, Ph.D. (ex-officio), Ben Thomas, Ph.D. (ex-officio)

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).

² National Capital Planning Commission, *Executive Director's Recommendation: New Monumental Arch*, NCPC File Number 8778, Washington DC: National Capital Planning Commission, June 4, 2026, <https://www.ncpc.gov/files/download.php?id=7780> (accessed May 30, 2026).

³ National Park Service, U.S. Department of the Interior, *Triumphal Arch at Memorial Circle: Assessment of Effects Report*, June 2026, <https://www.ncpc.gov/files/download.php?id=7862> (accessed June 22, 2026).

⁴ Roger W. Kirchen (Virginia Department of Historic Resources) to Jennifer T. Neresian (National Park Service), June 15, 2026; David Maloney (District of Columbia State Historic Preservation Office) to Jennifer T. Neresian (National Park Service), June 15, 2026; Kathryn G. Smith (National Historic Landmarks Program) to Tammy Stidham (National Park Service), June 15, 2026, all letters are combined in a single document located at <https://www.ncpc.gov/files/download.php?id=7864> (accessed June 22, 2026).

⁵ Donald J. Trump, "Executive Order 14252 - Making the District of Columbia Safe and Beautiful," *Federal Register* 90, no.14559, (March 27, 2025): 14559–14561. <https://www.federalregister.gov/d/2025-05837> (accessed June 5, 2026).

⁶ National Park Service, *Triumphal Arch at Memorial Circle: Assessment of Effects Report*, 22.

⁷ National Park Service, U.S. Department of the Interior, *Draft Programmatic Agreement Among the National Park Service, the National Capital Planning Commission, District of Columbia State Historic Preservation Office, and Virginia State Historic Preservation Office, Regarding the Triumphal Arch Project*, July 2026, <https://www.ncpc.gov/files/download.php?id=7863> (accessed June 22, 2026).

⁸ National Park Service, U.S. Department of the Interior, *Triumphal Arch at Memorial Circle: Environmental Assessment*, DOI-NPS-136973, June 2026, <https://www.ncpc.gov/files/download.php?id=7860> (accessed June 22, 2026).

⁹ National Capital Planning Commission, *Executive Director's Recommendation: New Monumental Arch*, NCPC File Number 8778, Washington DC: National Capital Planning Commission, July 9, 2026, <https://www.ncpc.gov/files/download.php?id=7780> (accessed July 2, 2026)



July 9th, 2026

Good afternoon, Chairman and Commissioners,

My name is **Shady Migally**. I am a professional architect and the designer of the **Independence Arch**, an alternative proposal for the monumental arch at Memorial Circle.

The updated design is displayed behind me today, and I have submitted revised hard copies to the Commission. These revisions address the historic preservation and visual concerns identified during the Section 106 review and in public comments, preserving key historic sightlines while creating a distinctly American national landmark.

I agree with a key point raised by architectural critics: authentic classical architecture is defined by proportion, hierarchy, and disciplined composition, rather than the replication of historic monuments. The Independence Arch was conceived as an original American civic monument that preserves the historic landscape and incorporates a meaningful annual Independence Day solar event that commemorates the signing of the Declaration of Independence in a way found nowhere else in the world, rather than an imitation.

This proposal demonstrates that we can achieve the project's patriotic purpose while preserving Memorial Circle's character and creating a landmark worthy of America's 250th anniversary.

As a practicing architect, I am presenting a complete architectural solution rather than simply expressing opposition to the current proposal. In the spirit of the Section 106 process, which encourages the consideration of alternatives that avoid or minimize adverse effects, I ask the Commission to recognize this fully developed alternative.

Along with my testimony, I am submitting a comprehensive design package documenting the architectural concept, site planning, preservation considerations, public benefits, and supporting analysis for the Independence Arch.

I respectfully ask the Commission to give this alternative thoughtful consideration.

Thank you for your time and consideration.

Respectfully submitted,

Shady Migally

Founder & CEO, ME Innovations

Architect and Designer of the Independence Arch



ME Innovations

Design . Architecture . 3D Visualization

+1(916)755-8071 | smigally@meininnovations.us

California, USA | www.meininnovations.us

THE INDEPENDENCE ARCH

A Distinctly American Monument Honoring the Civil War Veterans and the Generations of Americans Who Preserved Our Nation's Freedom



ME Innovations
Design . Architecture . 3D Visualization



THE INDEPENDENCE ARCH

TABLE OF CONTENTS

1. Formal Request Letter	1-A
2. Section 106 Response Memorandum	1-B
3. Decision-Maker Brief	1-C
4. Executive Summary	1-D
5. Project Overview	
• Project Location	2
• Design Vision & Introduction	3
• Annual Solar Alignment & Analysis	4
• Comparison with the Current Proposal	8
• Historic Sightline Preservation	11
6. Architectural Documentation	
• Site Plan	12
• Floor Plans	13
• Building Elevations	16
• Longitudinal & Cross Sections	18
7. Architectural Visualizations	
• Grand Museum Interior	19
• Monument Wall Relief & Sculpture Program	20
• Side Elevation Rendering	21
• 3D Massing Model	22
• Nighttime Rendering	23
8. Preservation & Context Analysis	
• Historic Sightline Preservation Diagram	24
• Comparative Sightline Analysis	26
9. Appendices	
• Design Statistics & Technical Data.....	27
• Author Biography & Qualifications	29
• Professional Design Statement	30
• References	31

INDEPENDENCE ARCH | AN ALTERNATIVE MEMORIAL FOR AMERICA'S 250TH ANNIVERSARY

DECISION MAKER BRIEF

Prepared by: Shady Migally
Founder & CEO | ME Innovations
Designer of the Independence Arch

Purpose

The Independence Arch is a fully developed alternative design for the proposed Memorial Circle monument. It has been prepared to achieve the commemorative objectives of America's 250th Anniversary while responding to preservation concerns identified during the ongoing Section 106 consultation process.

Recent comments submitted by consulting parties emphasize the importance of evaluating additional alternatives that minimize impacts on nationally significant historic resources. The Independence Arch has been specifically designed to address these concerns while creating a uniquely American national monument.

Key Design Advantages

Preserves Historic Sightlines

- Maintains visual relationships between the Lincoln Memorial, Arlington House, Arlington National Cemetery, and Memorial Circle through a large open central passage.
- Reduces obstruction of nationally significant views while preserving the ceremonial character of the site.



Reduced Visual Impact

Rather than relying primarily on solid mass, the Independence Arch achieves monumentality through an open structural composition, reducing perceived bulk while maintaining a strong civic presence.



THE ALTERNATIVE PROPOSAL



THE CURRENT PROPOSAL

America's Annual Civic Ceremony

Every July 4 at solar noon, sunlight enters a precisely engineered oculus within the monument and illuminates an inscribed stone at ground level bearing words from the Declaration of Independence.

This annual event transforms the monument into a recurring national ceremony celebrating America's founding ideals.



INDEPENDENCE ARCH | AN ALTERNATIVE MEMORIAL FOR AMERICA'S 250TH ANNIVERSARY

DECISION MAKER BRIEF

Educational Destination

The proposal incorporates:

- Museum exhibits
- Educational galleries
- Visitor orientation facilities
- Observation Rooftop deck overlooking Washington
- Year-round public programming

The monument therefore serves as both a national memorial and an educational institution.



How the Proposal Responds to Section 106 Concerns

The Independence Arch has been developed to respond directly to issues identified during consultation, including:

- Preservation of important historic views
- Reduced visual mass
- A distinctive commemorative concept rooted in American history
- Enhanced educational and visitor experience
- A fully developed alternative suitable for comparative technical evaluation

Public Interest

Following publication on social media, the proposal generated significant public engagement, including thousands of positive reactions and numerous comments encouraging submission to federal decision-makers. This response reflects meaningful public interest in exploring alternative approaches to commemorating America's 250th Anniversary.

facebook.com/IndependenceArch

Request

The Independence Arch is respectfully submitted for formal technical review as a reasonable design alternative.

A comparative evaluation of this proposal would assist federal agencies in determining whether America's commemorative goals can be achieved while addressing preservation concerns identified during the Section 106 process.



Sincerely,

Shady Migally
ME INNOVATIONS



SITE LOCATION AND LANDMARKS, WASHINGTON, DC.

Envisioned as the world's largest Independence Arch, this monument is designed to embody the scale, confidence, and enduring leadership of the United States while offering the American people a timeless landmark that is uniquely their own. More than a monumental structure, the Arch is conceived as a civic destination that harmonizes with the surrounding historic landscape, preserving and complementing the character of nearby national landmarks. Its architecture expresses unity, democratic ideals, and the enduring promise of freedom, creating a distinguished gateway that honors the Nation's founding while projecting strength, dignity, and optimism for generations to come.

WE NEED PRESTIGE, BEAUTY, & STRENGTH

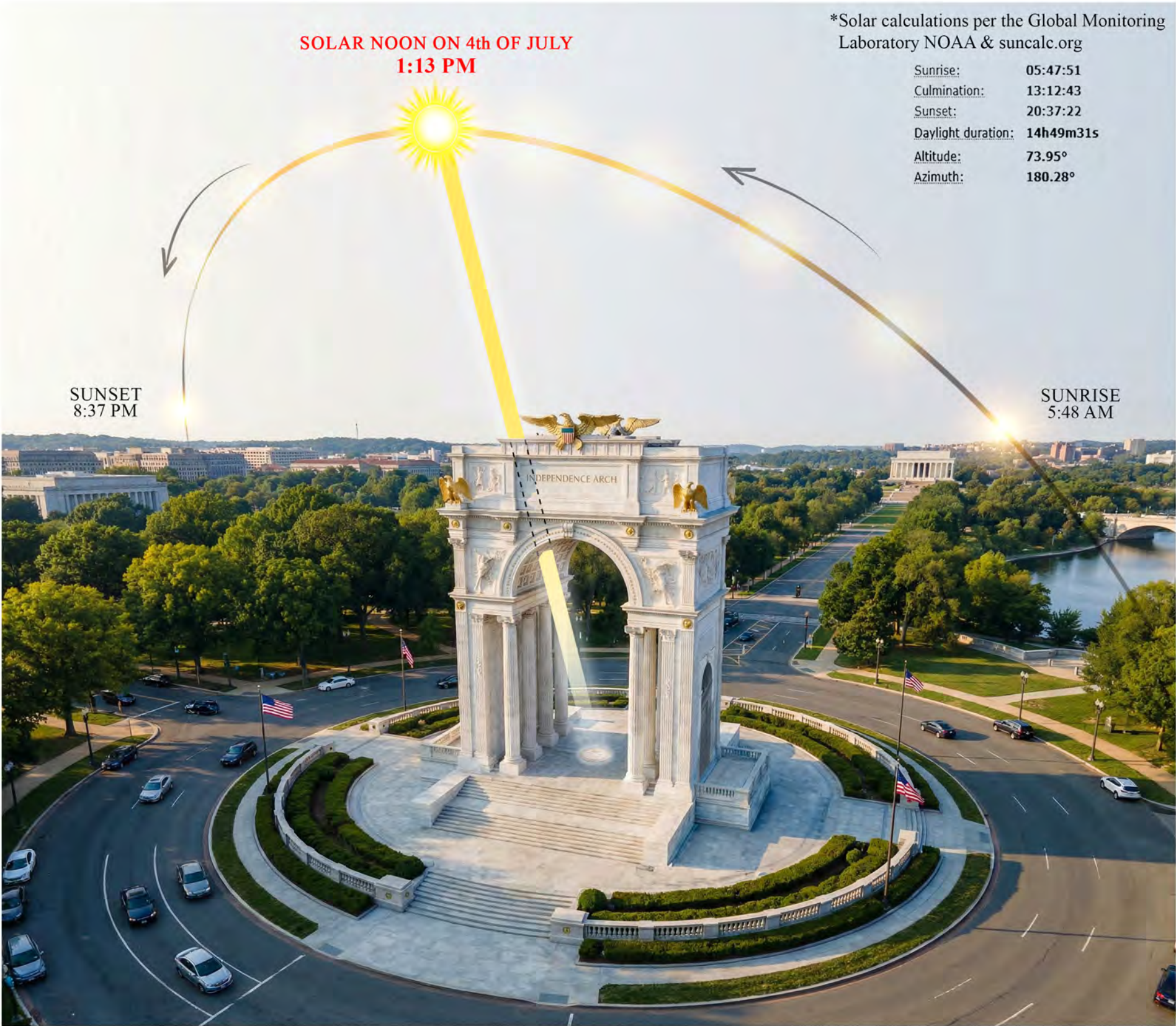


The Independence Arch complements the Lincoln Memorial and Washington Monument, reinforcing the ceremonial axis between the Lincoln Memorial and Arlington National Cemetery while preserving the historic landscape.

Interactive Architecture... An Annual Alignment of Light and Liberty

Only on July 4 at solar noon (approximately 1:13 PM EDT) does the sun reach its maximum annual altitude of about 74° over Washington, D.C. At that precise moment, a circular roof oculus channels a concentrated beam of sunlight through a calibrated shaft onto a stone datum below, commemorating Independence Day through the natural alignment of the sun rather than applied symbolism.

This circular illumination occurs only during the annual alignment. At all other times, the beam shifts or disappears, symbolizing that liberty is not static, but is realized through enduring alignment with the ideals upon which the Nation was founded.



Annual July 4 solar analysis for Washington, D.C., showing the sun's altitude at 1:13 PM (solar noon). At this precise moment, a 16° inclined solar tube aligns with the incoming sunlight to illuminate the monument's stone datum.



In this way, the monument becomes an interactive civic landmark requiring no mechanical systems or human intervention. Each Independence Day, it marks the anniversary through the natural alignment of the sun, reminding Americans that freedom is not static, but continually renewed, echoing the enduring promise of a...

“ New birth of freedom ”

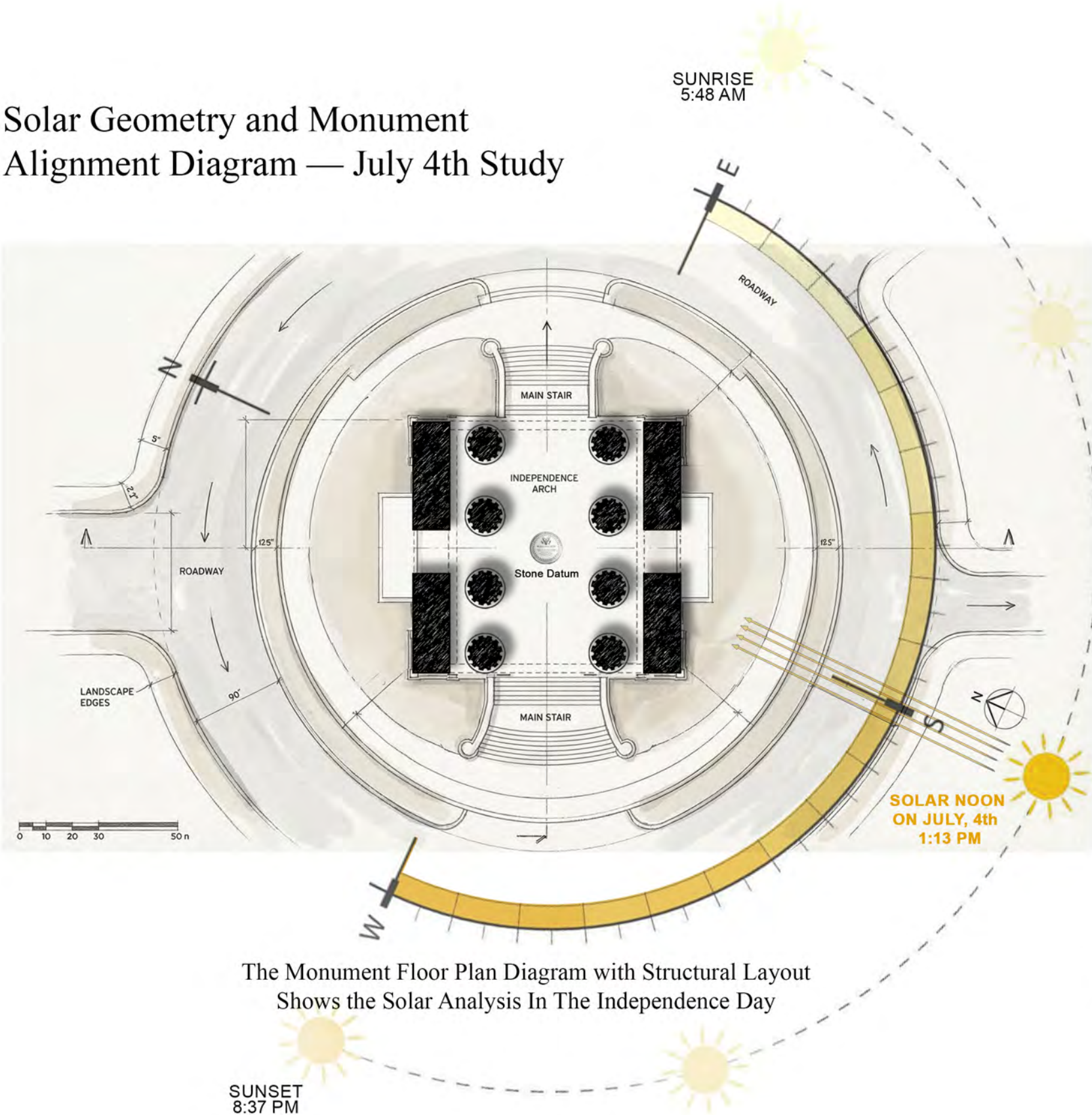
This annual event has the potential to become a globally recognized civic tradition, drawing international attention to America's founding ideals and demonstrating the Nation's enduring leadership, confidence, and commitment to liberty.



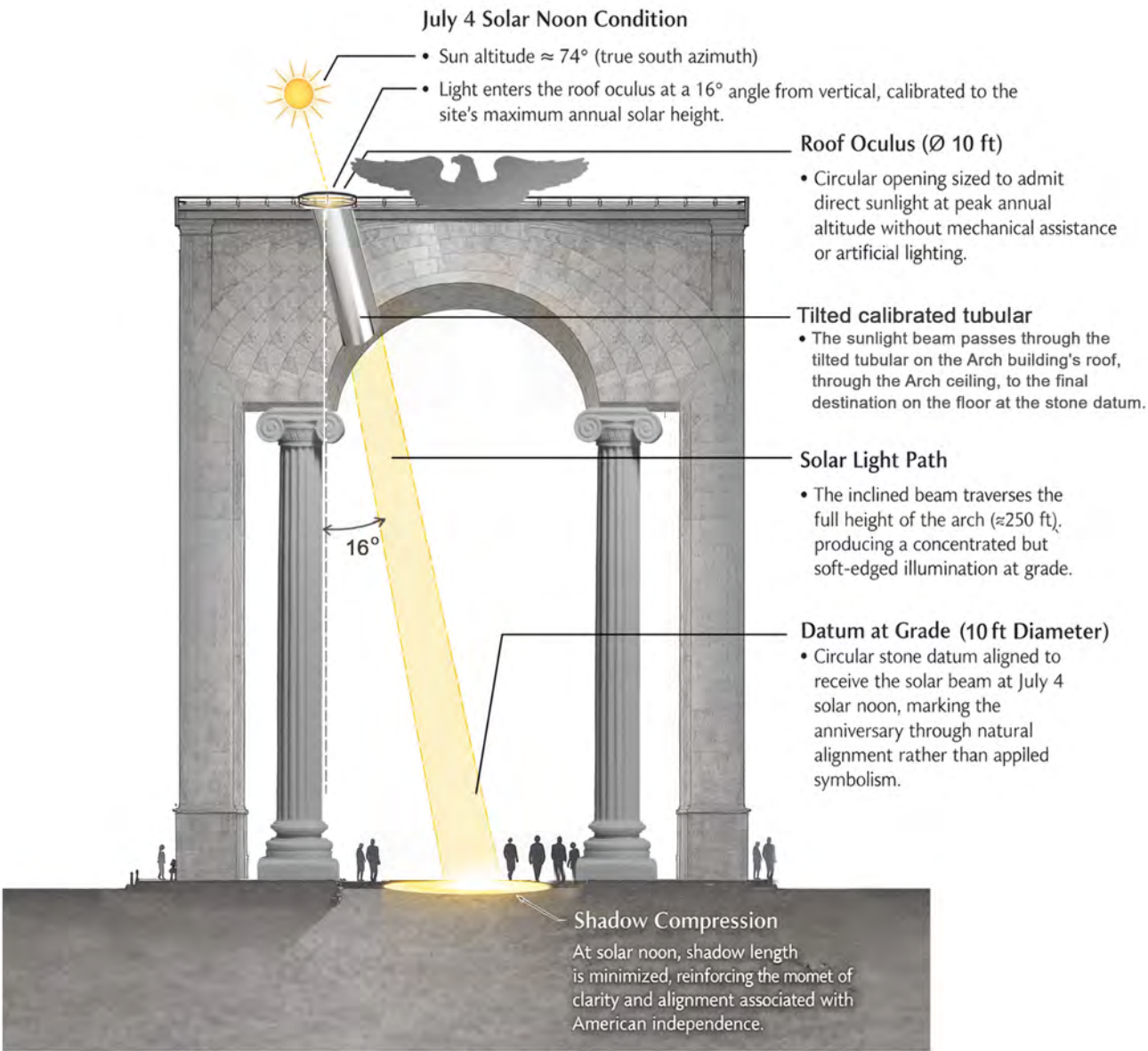
The sunlight passes through the Arch roof in a time frame of about 20 min, once a year

10-foot Circular stone datum aligned to receive the solar beam at July 4th solar noon

Solar Geometry and Monument
Alignment Diagram — July 4th Study



The Monument Floor Plan Diagram with Structural Layout
Shows the Solar Analysis In The Independence Day



Section Diagram Shows the Solar Alignment Roof-to-Datum Illumination,
and Study of the Light Transmission, Solar Projection, and Target Calibration.



Aerial Perspective Showing Sunbeam Reaching the Floor Through the Arch Roof and Illuminating the Stone Datum Within the Arch Shadow

Rather than drawing from traditional precedents, the design deliberately avoids direct resemblance to monuments such as the Arc de Triomphe, instead establishing a new and uniquely American civic form. Symbolic elements, including the American eagle, are thoughtfully integrated to convey strength, unity, and progress, positioning the monument as a lasting national icon and a defining cultural achievement of its time.

250 ft.

164 ft.



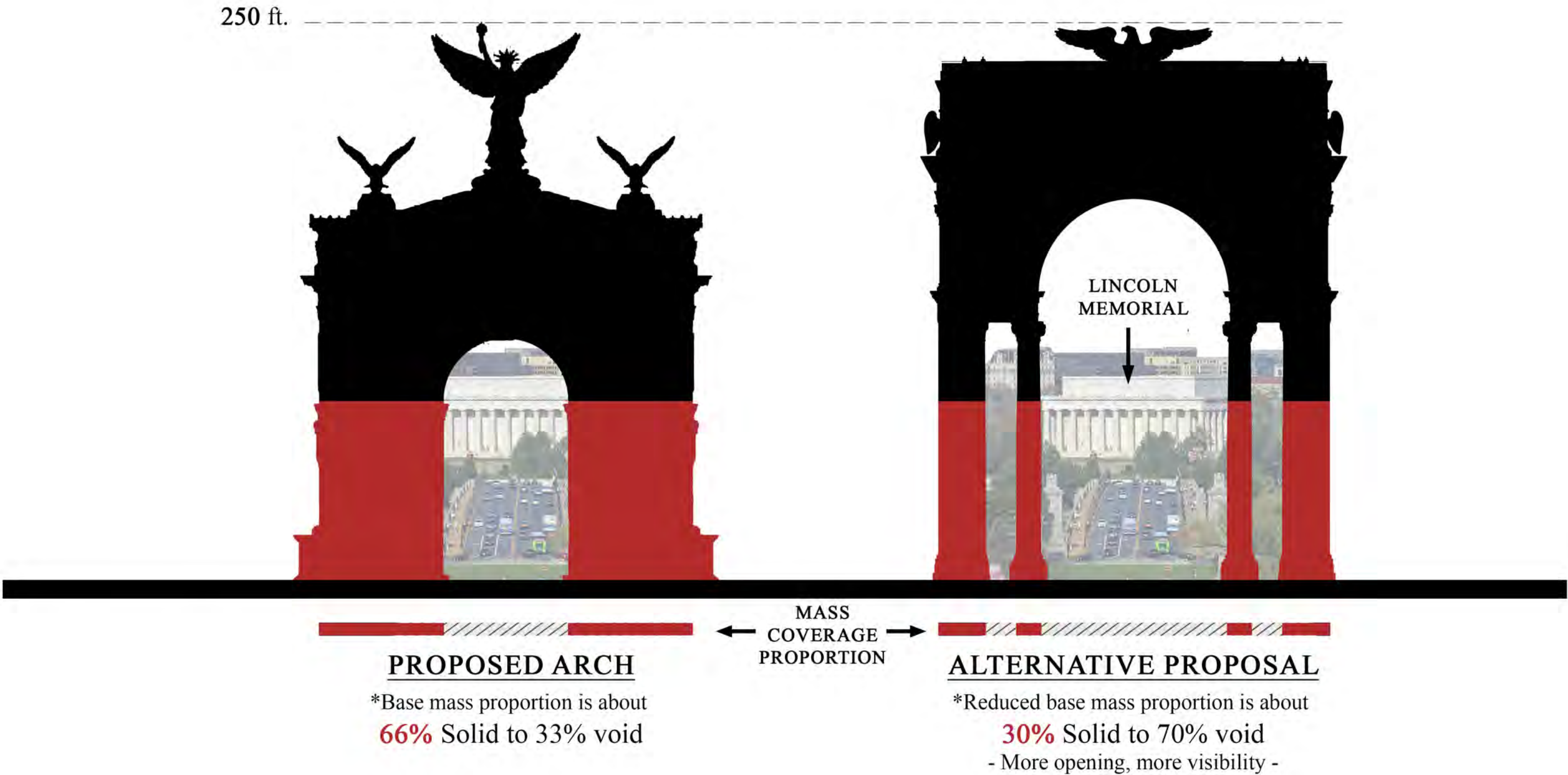
ARC DE TRIOMPHE
PARIS

PROPOSED ARCH
WASHINGTON, DC

ALTERNATIVE PROPOSAL
WASHINGTON, DC

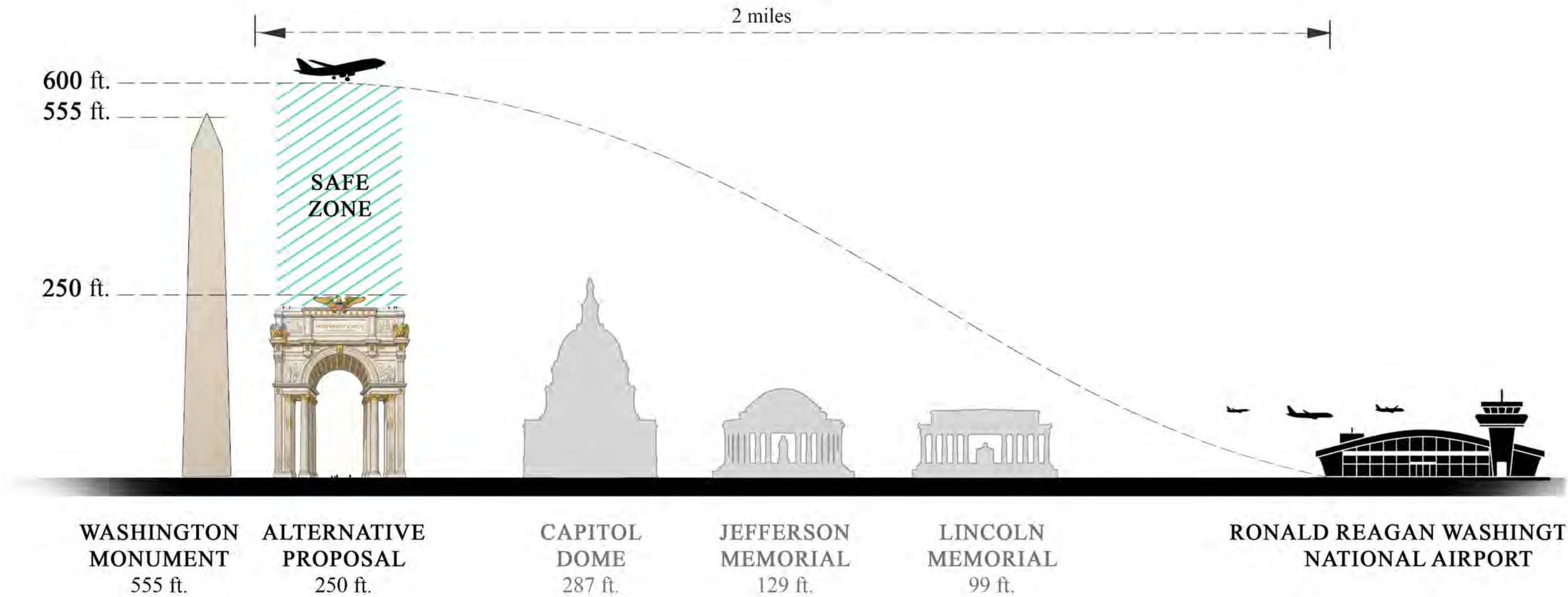
How the independence arch will conect the relationship between the arlington national cemetery and lincoln memorial?

The proposal is developed as a distinct architectural solution that departs from traditional precedents while maintaining clarity of form, proportion, and constructability. The alternative proposal arch is designed with a reduced base mass to enhance spatial openness and preserve key axial relationships within the site.



Will the 250 ft Arch height affect the airline traffic?

Both the Washington Monument and the Independence Arch are about **2 miles** away from the nearest airport (Ronald Reagan Washington National Airport). According to the Federal Aviation Administration (FAA), an airplane at 2 miles from the runway threshold is typically around **600 feet** above ground level (AGL) on a standard 3-degree glide path. This is based on the aviation rule of thumb of descending 300 feet per 1 nautical mile (NM) of distance from the runway.



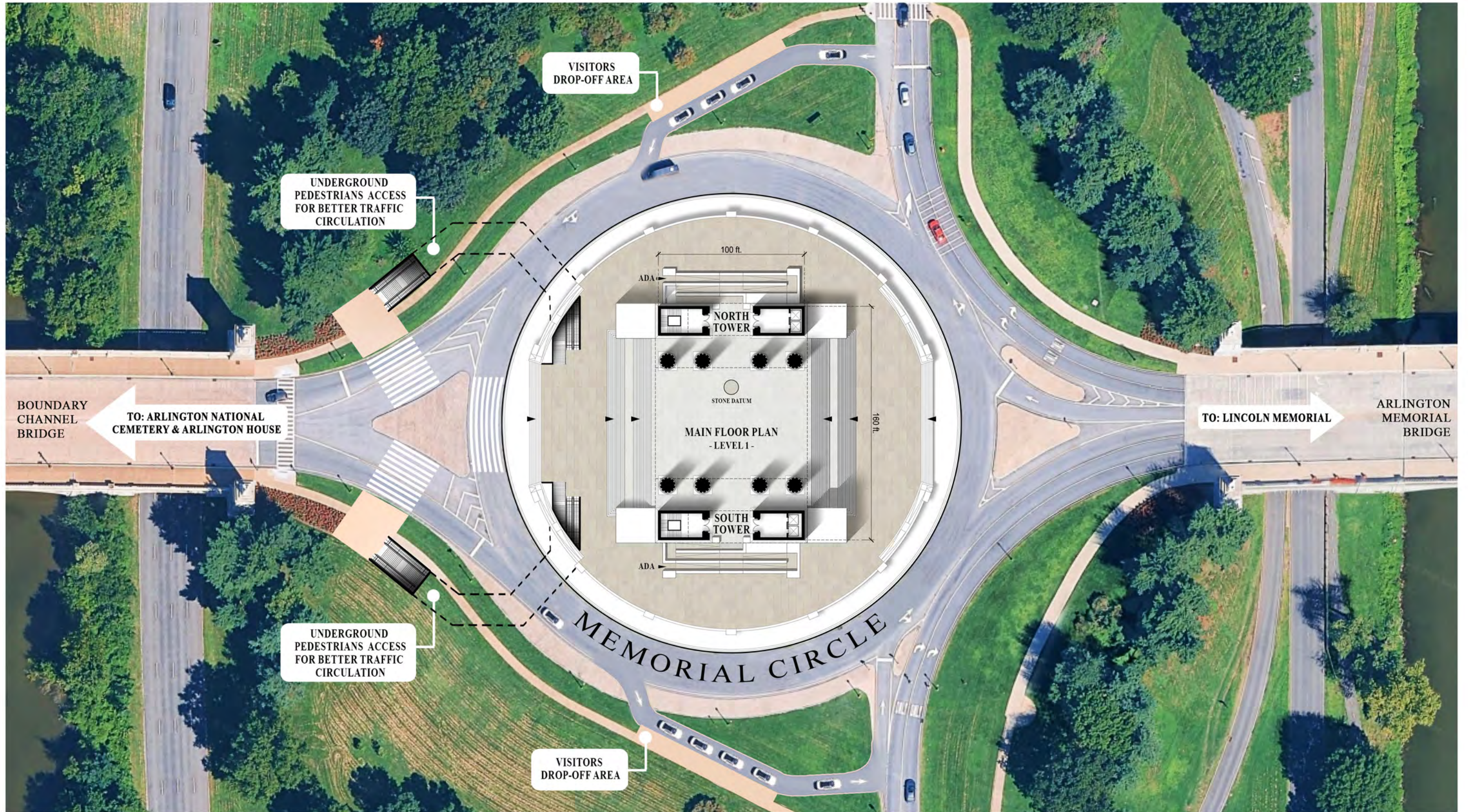


▲ Before

◀ After

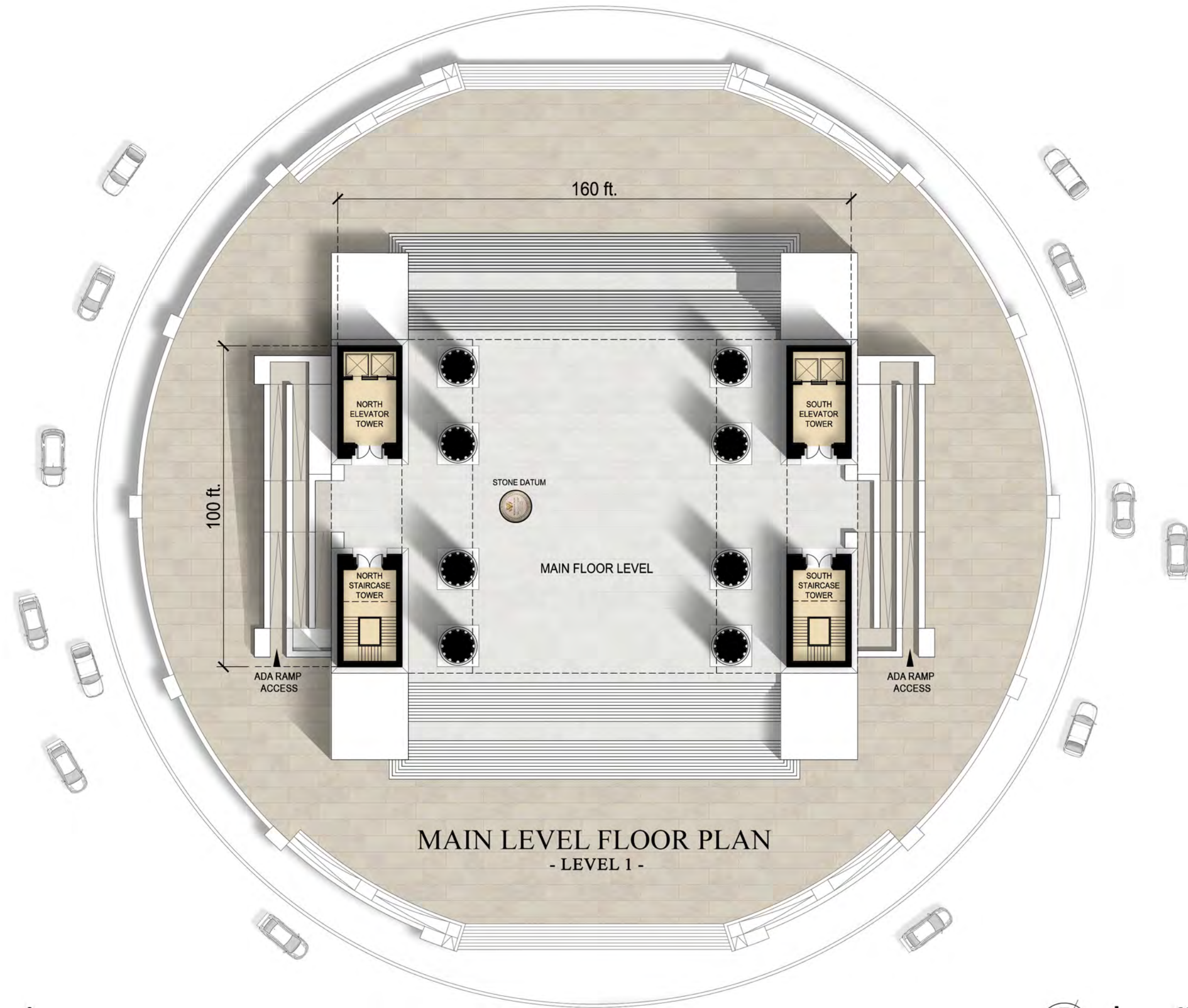
The view from the Lincoln Memorial and the Arlington Memorial Bridge reveals the strong visual relationship between the Arch, Arlington House, and Arlington National Cemetery.

The proposed Arch enhances the significance of these existing landmarks by framing them within a unified civic composition, reinforcing their prominence while drawing focused attention to their symbolic and visual importance.

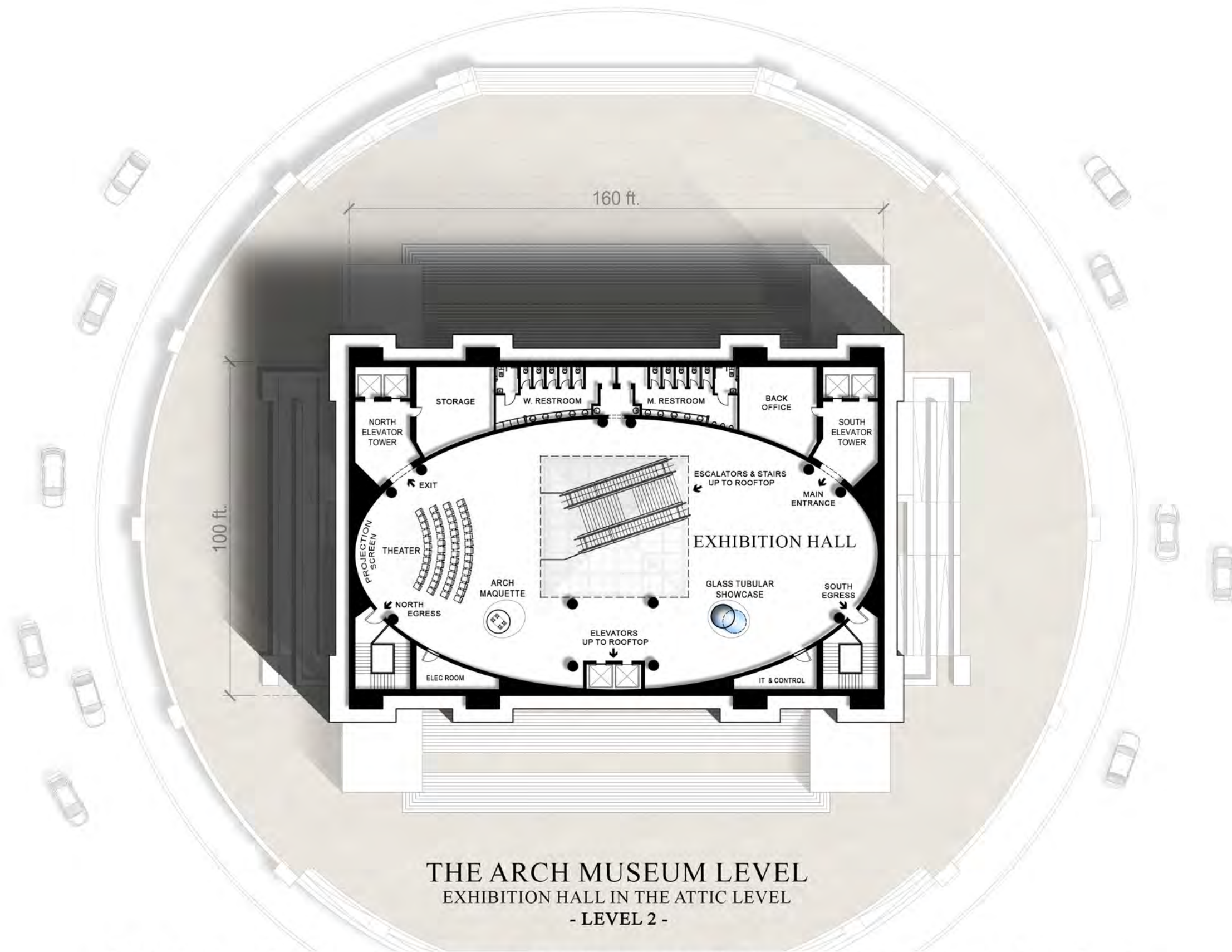


SITE PLAN

COPYRIGHT 2026 ME INNOVATIONS LLC, ALL RIGHTS RESERVED

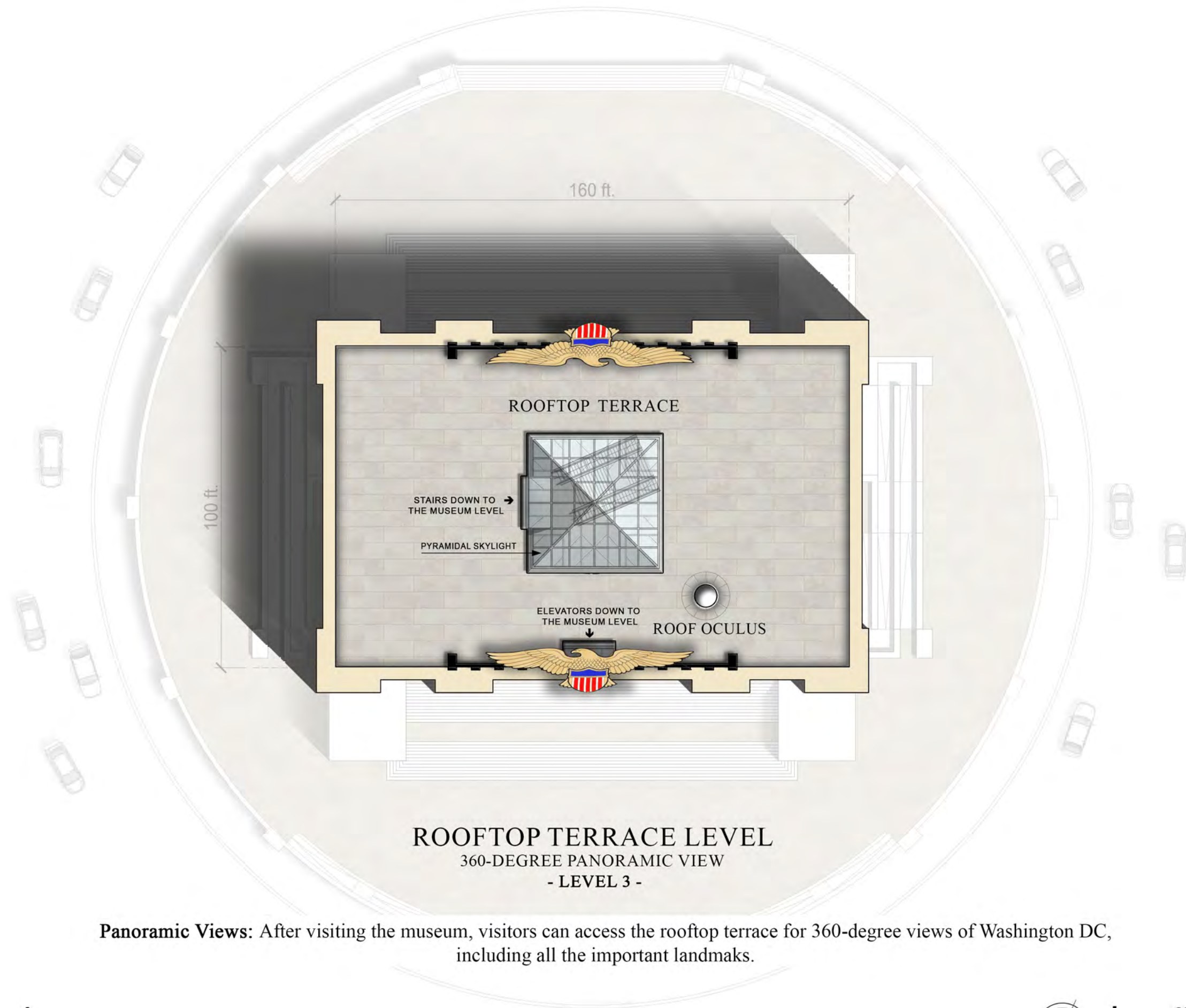


MAIN LEVEL FLOOR PLAN
- LEVEL 1 -

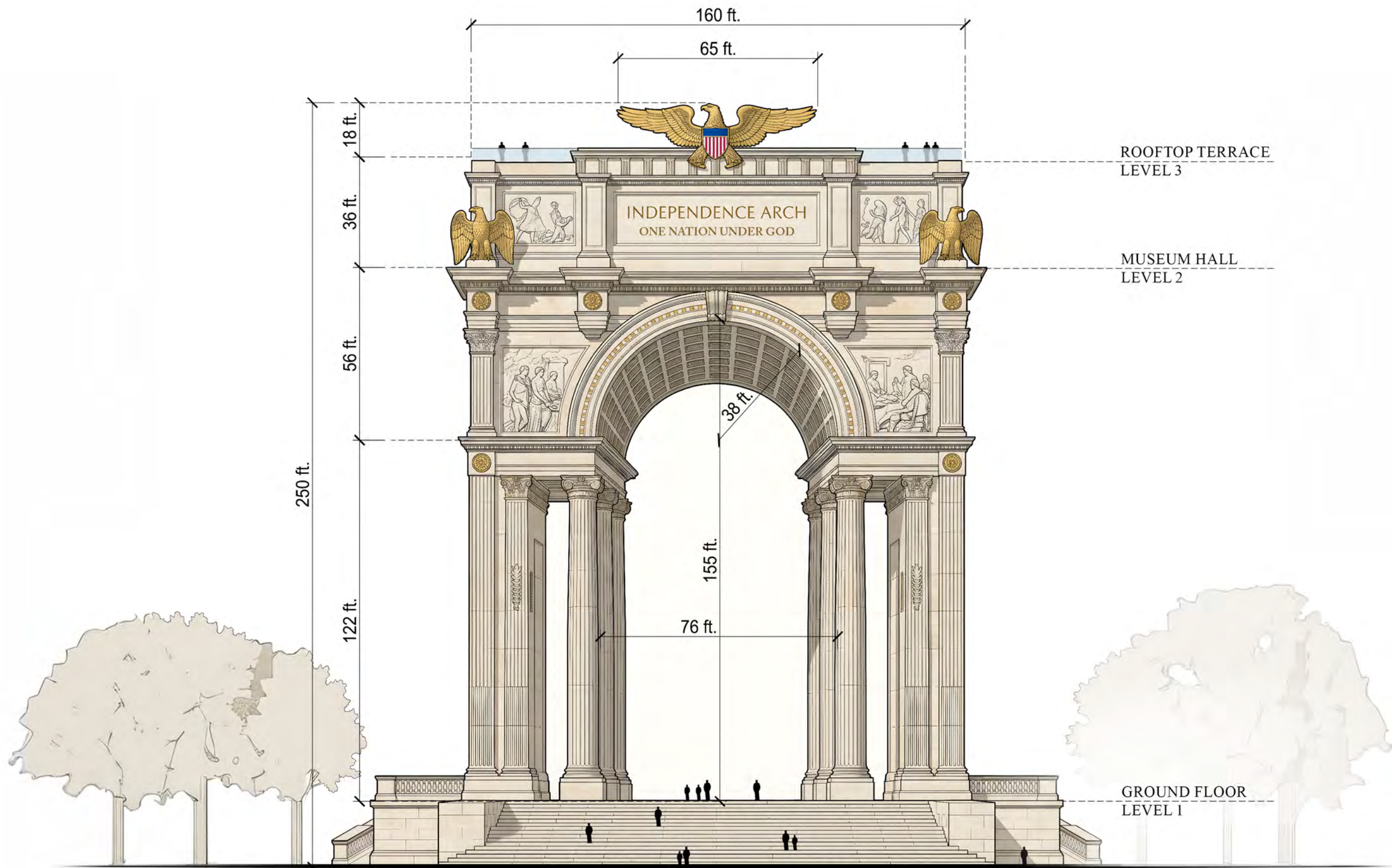


Exhibition Area: Features artifacts, documents, and media screens detailing the history of the monument and its sculptures.

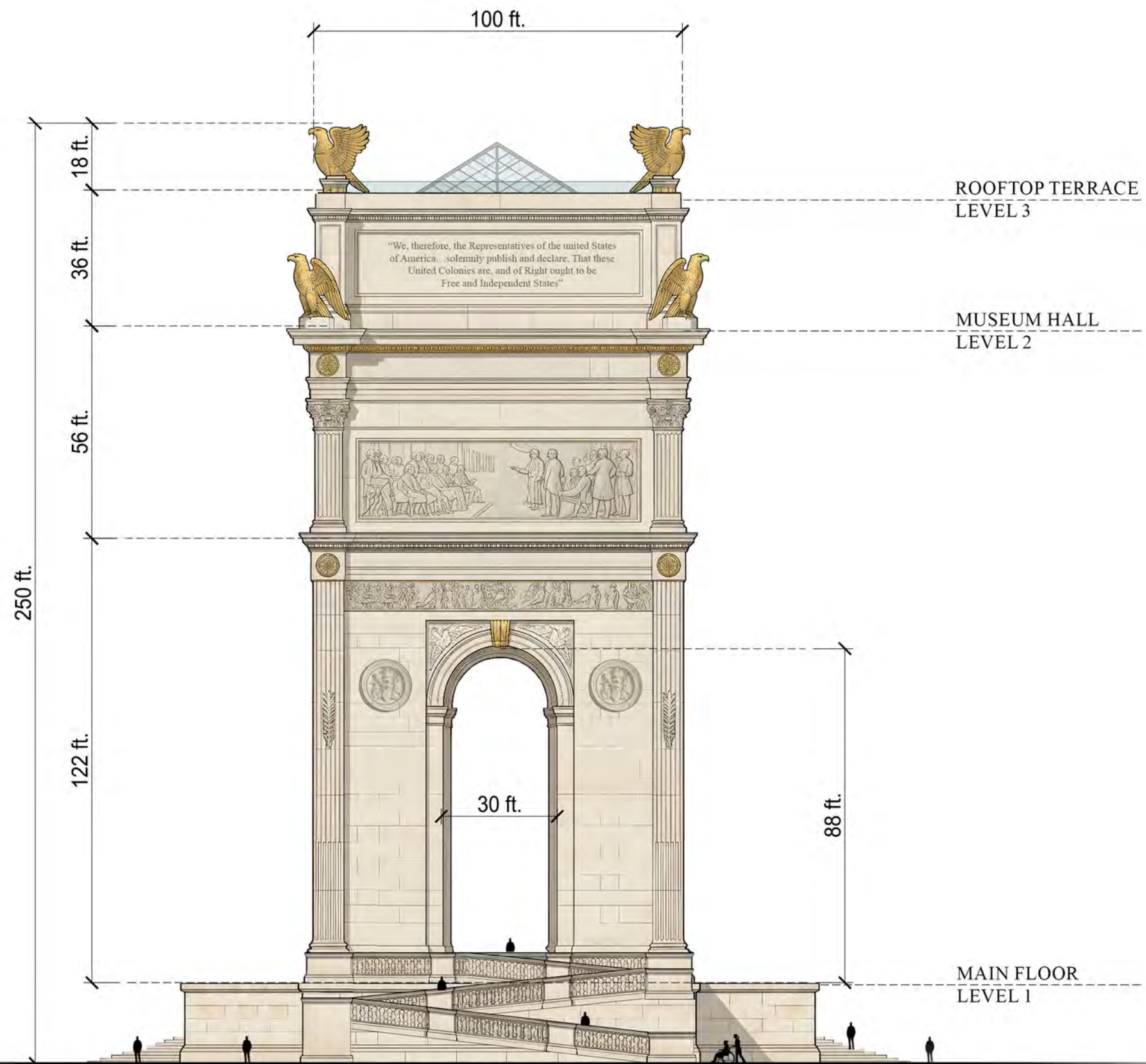
Model Display: Includes a model of the monument to help visitors understand its architecture.



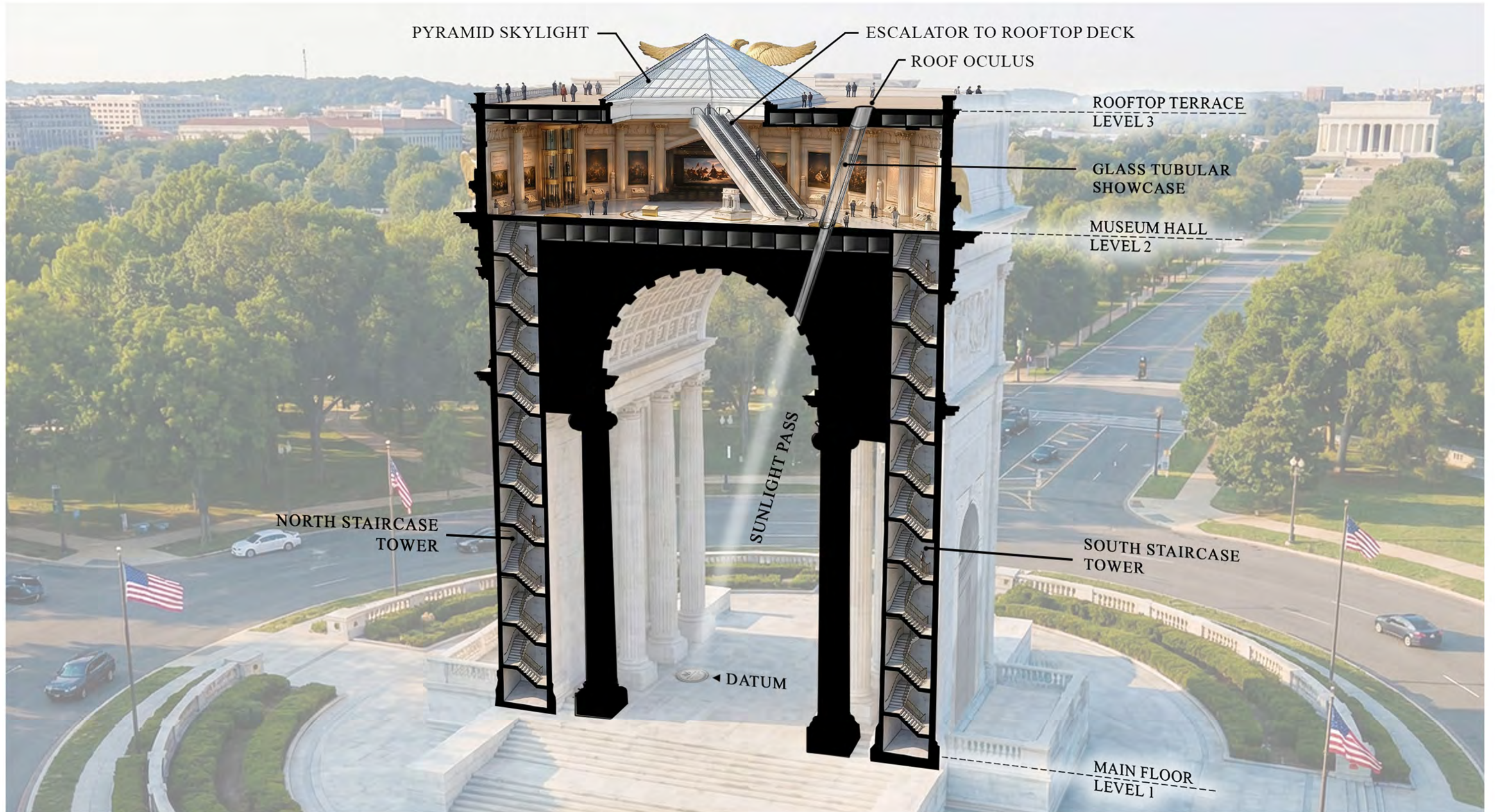
Panoramic Views: After visiting the museum, visitors can access the rooftop terrace for 360-degree views of Washington DC, including all the important landmarks.



FRONT ELEVATION



SIDE ELEVATION



SECTION



THE GRAND MUSEUM ATRIUM

Exhibition Hall: Showcasing artifacts, documents, historical exhibits, and theater that detail the monument's history and its sculptural program. (Maximum occupancy: 250 people.)



The Arch's wall surfaces feature finely carved marble reliefs, subtle gilded accents, and engraved portraits interpreting pivotal moments surrounding the signing of the Declaration of Independence. Executed with classical discipline and material restraint, these elements are integrated into the architectural fabric rather than applied as ornament. The artwork honors the individuals, debates, and resolutions that shaped the nation's founding while preserving the monument's overall clarity, dignity, and civic permanence.



Side view perspective showing the openness in the side elevations



3D Massing Model



Night view showcasing the effects of architectural and landscape lighting. The overall composition conveys solemnity, permanence, and a strong national presence, expressed with a historically grounded atmosphere.



THE ALTERNATIVE PROPOSAL



THE CURRENT PROPOSAL

LINCOLN MEMORIAL SIGHTLINE PRESERVATION DIAGRAM
VIEW FROM ARLINGTON HOUSE



THE ALTERNATIVE PROPOSAL



THE CURRENT PROPOSAL

ARLINGTON HOUSE SIGHTLINE PRESERVATION DIAGRAM
VIEW FROM LINCOLN MEMORIAL



THE ALTERNATIVE PROPOSAL



THE CURRENT PROPOSAL

Independence Arch: A Superior Alternative Preserving Historic Sightlines, Complementing Arlington's Historic Landscape, and Creating a Distinctly American National Landmark

A P P E N D I C E S

DESIGN STATISTICS & TECHNICAL DATA

Project Information

Item	Description
Project:	Independence Arch.
Project Type:	National Monument, Museum & Observation Landmark.
Proposed Location:	Memorial Circle, Washington, D.C.
Purpose:	Commemorate America's 250th Anniversary while honoring the generations of Americans who defended and preserved the Nation's freedom.
Designer:	Shady Migally, Founder & CEO, ME Innovations LLC
Architectural Style:	Neoclassical Architectural Style
Design Philosophy:	An original American civic monument rooted in classical principles while avoiding direct replication of historic European

Monument Dimensions

Item	Data
Overall Height:	250 ft (76.2 m)
Observation Deck Elevation	Approximately 230 ft
Overall Width:	160 ft
Overall Depth:	100 ft
Main Arch Opening Width:	76 ft
Main Arch Opening Height:	155 ft
Structural System:	Reinforced concrete and structural steel frame with natural stone cladding
Primary Exterior Material:	Granite / White Colorado Yule Marble
Foundation System:	Reinforced concrete mat foundation and deep foundation system (Conceptual)
Design Life:	200+ years

Museum

Item	Data
Museum Type:	American History Museum integrated within the monument
Museum Levels:	Attic Level Below the Observation Roof deck
Total Museum Area:	16,000 sq ft
Primary Exhibits:	Declaration of Independence, American Revolution, Civil War, U.S. Military History, American Innovation, Freedom Timeline
Accessibility:	Fully ADA Accessible
Vertical Circulation:	Elevators, escalators and Staircases
Public Restrooms:	Included
Gift Shop:	Included
Educational Space:	Included
Theater	Included

Observation Deck

Item	Data
Viewing Elevation	Approximately 230 ft
Viewing Direction	360° panoramic views
Maximum Occupancy	2,400 people (comfort levels generally limit it to 1500 to 2000 people)
Access	Elevator, Escalator, Staircase
ADA Accessible	Yes
Primary Views	Lincoln Memorial, Washington Monument, U.S. Capitol, Arlington National Cemetery, Potomac River, National Mall

Historic Preservation Benefits

- Preserves the historic visual relationship between the Lincoln Memorial and Arlington House.
- Reduces visual obstruction compared with the current proposal.
- Maintains Memorial Circle as an open ceremonial landscape.
- Responds to concerns raised during the Section 106 consultation process.
- Enhances public interpretation through an integrated museum.
- Improves visitor circulation and accessibility.
- Creates a destination while respecting the site's historic character.

DESIGN STATISTICS & TECHNICAL DATA

Annual Solar Alignment

Item	Data
Event Date:	July 4 (Annually)
Event Time:	Solar Noon (approximately 1:13 PM EDT)
Sun Altitude:	Approximately 74° (True South Azimuth)
Vertical Angle:	Approximately 16°
Alignment Feature:	Roof Oculus and Solar Tube
Beam Target:	Stone Datum Inscribed with Words of the Declaration of Independence.
Beam Diameter:	Approximately 10 ft
Illumination Duration:	Approximately 20 minutes
Symbolic Meaning:	Annual renewal of liberty and the enduring light of the Declaration of Independencen triumphal arches.

Sustainability & Building Performance

Item	Data
Daylighting:	Extensive natural daylight within museum and circulation spaces
Energy Strategy:	High-performance building envelope (Conceptual)
Building Materials:	Durable natural stone designed for long service life
Estimated Service Life:	More than 200 years
Maintenance Strategy:	Low-maintenance exterior materials
Universal Accessibility:	Fully ADA compliant

Visitor Experience

Item	Data
Museum:	Immersive American history exhibits
Observation Deck:	Panoramic rooftop experience
Annual Solar Ceremony:	July 4 solar alignment event
Educational Programs:	Historical interpretation
Photography Opportunities:	360° views of Washington
Accessibility:	Elevators, Escalators, ramps, and accessible routes throughout

Architectural Symbolism

Item	Data
Monument Height:	Celebrates America's 250th Anniversary
Classical Architecture:	Continuity with America's civic architecture
Independence Arch:	Gateway to freedom and national unity
Integrated Museum:	America's continuing story
Annual Solar Alignment:	The enduring light of liberty
Declaration of Independence:	Founding ideals of the Nation
Thirteen Primary Stone Bars:	The original Thirteen Colonies
Fifty Secondary Elements:	The Fifty States
Rooftop Observation Deck:	Looking toward America's future

Design Objectives

- Create a uniquely American national monument
- Honor America's founding principles
- Respect the historic landscape
- Preserve significant sightlines
- Educate future generations
- Create a world-class civic destination
- Establish an annual Independence Day architectural event
- Integrate history, architecture, and public engagement into a single national landmark

PROFESSIONAL DESIGN STATEMENT

INDEPENDENCE ARCH: A VISION FOR AMERICA'S NEXT GREAT NATIONAL MONUMENT

Architecture has the power to tell a nation's story. The most enduring civic monuments do more than commemorate history, they inspire future generations, embody national ideals, and create meaningful public experiences that strengthen our shared identity.

The Independence Arch was conceived with this philosophy in mind.

Rather than replicating a historic European triumphal arch, this proposal seeks to create a monument that is unmistakably American in both its symbolism and purpose. It is designed to celebrate the principles established in the Declaration of Independence while honoring the sacrifices of the generations of Americans who preserved those ideals, including the more than 14,000 Civil War veterans buried at Arlington National Cemetery.

The design embraces the classical architectural tradition that has long characterized the nation's civic buildings, yet it establishes its own identity through original composition, symbolism, and public experience. Every major design element was developed to express American history rather than imitate foreign precedent.

The monument is intended to serve several complementary purposes. It functions as a national memorial, an educational museum, a public observation destination, and a place for civic reflection. Visitors would experience the story of the United States through museum exhibits before ascending to a panoramic observation deck overlooking the nation's most significant historic landmarks. In this way, the monument becomes both a destination and an educational journey.

One of the defining features of the Independence Arch is its annual solar alignment. Each year on July 4, at solar noon, a precisely aligned beam of sunlight illuminates an inscription of the Declaration of Independence within the monument. This recurring event symbolizes the enduring light of liberty and the continuing renewal of the American experiment in self-government. Rather than existing only as a static monument, the Independence Arch becomes a living civic landmark that marks Independence Day through an architectural event unique to the United States.

Equally important was the responsibility to respect the historic setting of Memorial Circle. The proposal was developed with careful attention to preserving the visual relationship between the Lincoln Memorial, Arlington House, Arlington National Cemetery, and the surrounding commemorative landscape. The design seeks to demonstrate that a significant national monument can enrich the site while maintaining the historic character and sightlines that define this important place.

The Independence Arch is offered respectfully as an alternative concept intended to contribute constructively to the ongoing public dialogue surrounding America's 250th Anniversary memorial. It is not presented in opposition to the goals of commemorating the nation's founding, but as an opportunity to achieve those goals through an original architectural expression that is rooted in American history, responsive to preservation principles, and designed to inspire future generations.

As an architect, I believe our nation's most important monuments should reflect not only the achievements of the past but also the values we hope to carry forward. The Independence Arch is my contribution to that vision, an enduring symbol of freedom, unity, remembrance, and the continuing promise of the United States of America.

Shady Migally
Founder & CEO, ME Innovations LLC
Architect and Designer of the Independence Arch

REFERENCES

Federal Planning & Regulatory Agencies

1. National Capital Planning Commission (NCPC)
2. National Park Service (NPS)
3. U.S. Commission of Fine Arts (CFA)
4. Federal Highway Administration (FHWA)
5. Federal Aviation Administration (FAA) Obstruction Evaluation Group
6. Advisory Council on Historic Preservation (ACHP)
7. Library of Congress
8. National Archives and Records Administration

Project-Specific Federal Review Documents

9. NCPC Project No. 8778 – New Monumental Arch, Memorial Circle. Project materials, environmental documents, transportation studies, Section 106 consultation records, and public comments.
10. Commission of Fine Arts Review – New Monumental Arch, Memorial Circle, April 16, 2026.
11. Commission of Fine Arts Review – New Monumental Arch, Memorial Circle, May 21, 2026.
12. NCPC Comments on Concept Plans for the New Monumental Arch, June 4, 2026.
13. Combined Section 106 Comment Letters submitted during federal review process. Available through NCPC Project No. 8778.
14. Assessment of Effects Report and Draft Programmatic Agreement prepared under Section 106 consultation. Available through NCPC Project No. 8778.
15. Public Testimony Submitted to NCPC regarding the Monumental Arch Proposal.
16. Public Comment Summary Reports submitted during federal review.

Historic Preservation & Section 106 References

17. National Historic Preservation Act of 1966, as amended.
18. Section 106 Regulations (36 CFR Part 800).
19. Secretary of the Interior's Standards for the Treatment of Historic Properties.
20. George Washington Memorial Parkway Cultural Landscape Documentation.
21. Arlington Memorial Bridge Historic Structure Reports.
22. Arlington National Cemetery Historic Preservation Documentation.
23. Lincoln Memorial Historic Structure Reports.
24. Memorial Circle Historic Context Studies.

Historic Planning & Design References

25. Pierre Charles L'Enfant, Plan of the City of Washington (1791).
26. Daniel Burnham et al., The McMillan Plan (1901–1902).
27. U.S. Senate Park Commission Reports (McMillan Commission Reports).

28. Historic studies of Columbia Island and Memorial Circle precedent proposals submitted to CFA.
29. National Mall and Memorial Parks Historic Resource Studies.

Solar Alignment & Astronomical References

30. NOAA Solar Calculator – Official solar noon, solar elevation, azimuth, sunrise, and sunset calculations.
31. NOAA Solar Position Calculator – Solar altitude and azimuth calculations.
32. U.S. Naval Observatory Astronomical Applications Department
33. National Oceanic and Atmospheric Administration (NOAA), Solar Geometry and Solar Position Methodology.

Aviation, Airspace & Height References

34. FAA Obstruction Evaluation Program.
35. Title 14 CFR Part 77 – Safe, Efficient Use, and Preservation of Navigable Airspace.
36. FAA OEAAA (Obstruction Evaluation / Airport Airspace Analysis) System.
37. Ronald Reagan Washington National Airport (DCA) Airspace Protection Requirements.
38. FAA Aeronautical Study Guidance for Structures Affecting Navigable Airspace.
39. Height of Buildings Act Analysis prepared for NCPC Project No. 8778

Architectural & Monument Precedent Studies

40. Lincoln Memorial
41. Arlington National Cemetery
42. Arlington House
43. Arlington Memorial Bridge
44. Washington Monument
45. Historic studies of national memorials, ceremonial gateways, and civic monuments in Washington, D.C.

Primary Historical Sources

46. United States Declaration of Independence
47. American Revolution
48. American Civil War
49. Gettysburg Address, 1863.
50. Arlington National Cemetery historical records.
51. National Archives founding documents collection.

***All solar calculations, federal review documentation, historic preservation references, and planning materials cited herein were obtained from official United States Government sources unless otherwise noted.**



THE INDEPENDENCE ARCH

ARCHITECTURAL CONCEPT, DESIGN, AND VISUALIZATION BY



ME Innovations

Design . Architecture . 3D Visualization

Shady Migally

Additional Information Available Upon Request

- This presentation package is intended to provide an overview of the Independence Arch concept and its principal design, planning, and preservation benefits.
- Further technical studies, preservation analyses, architectural documentation, renderings, photographs, and video presentations can be prepared and provided to support future Federal, civic, and stakeholder review processes.



My name is Margaret Cowan, and I live in Wilmot, New Hampshire. As an American citizen, I strongly oppose approval of the preliminary and final site and building plans for the proposed New Monumental Arch.

NCPC should not approve this project. At its June meeting, the Commission identified serious unresolved issues involving traffic and pedestrian safety, parking and loading, height justification, FAA coordination, materials, lighting, security, Section 106, and NEPA. These are not minor details to be cleaned up after approval. They are threshold issues that go to whether this project is appropriate, lawful, safe, and respectful of its setting.

The aviation issue alone should prevent approval at this time. A preliminary FAA review is not the same as a completed aeronautical study, especially for a 250-foot structure near Reagan National Airport and its approach and departure corridor. The fact that this so-called monument would require red obstruction lights only underscores how inappropriate it is for the solemn landscape near Arlington National Cemetery.

I have worked in New Hampshire tourism for more than forty years, including as a tour guide in the White Mountain National Forest. I know what happens when a place becomes a required stop: buses arrive, crowds gather, traffic backs up, trash appears, restrooms and walkways are strained, and the place itself starts serving the attraction instead of the other way around.

That may be manageable in a large recreation area designed for visitors. It is entirely wrong for the solemn civic and commemorative landscape near Arlington National Cemetery and the nation's memorial core.

Most importantly, this proposal is an affront to the men and women buried at Arlington National Cemetery. Those who gave their lives in service to this country should not have a 250-foot vanity monument looming over the landscape where they are laid to rest. Arlington is not a backdrop, a branding opportunity, or a place for self-glorification. To impose this arch there would be, in my opinion, a desecration of the memory of our war dead.

A 250-foot occupied arch with elevators, ticketing, restrooms, programming space, and an observation deck would create a spectacle and a pressure point in a place that demands restraint. This project would not honor that landscape. It would desecrate it.

NCPC should not approve the preliminary or final site and building plans. The application should be rejected, deferred, or withdrawn.

Thank you.

Margaret Cowan
Wilmot, New Hampshire

I am an architect who has been practicing in Washington DC for almost 50 years. I am also an inveterate history buff, especially of American history. As both, I appreciate the profound significance that DC's iconic buildings have on the symbolic expression of that history. The very fabric of the Federal City is in itself a monument to the founding of this country, a constitutional republic based on the radical idea that the people can govern themselves. Now, on the eve of the 250th anniversary of that idea, I fear that the National Capital Planning Commission, in conjunction w/ the National Park Service, is about to approve and embark on a project that will destroy one of the most symbolic aspects of that physical monument. That project is the proposed triumphal arch at Memorial Circle.

NCPC and NPS has already received thousands of comments, 99% of which are adamantly opposed to construction of this arch. Major objections are based on important considerations: safety (pedestrian, vehicular *and* air!); design (the height and mass of the arch is wildly inappropriate); environment (no Environmental Impact Study has been done); legal (various federal laws governing construction of federal monuments as well as those requiring adherence to local review processes have been flouted); funding (Congress must appropriate this and to date has not); structural (can the island on which Memorial Circle sits support the arch's massive stone and concrete piers?).

But the most important one, that threatens the monumental expression of the Federal City as a symbol of American democracy, is the destruction of the iconic axis between the Lincoln Memorial and Arlington House. Described on NPS's own website as the Memorial Avenue Corridor, this axis was 'conceived as a grand entryway to Arlington Cemetery and a symbolic link between the Lincoln Memorial and Arlington House.' The sightline established between the DC and Virginia anchors was intentional and meant to symbolize the call for national reconciliation that occurred after the Civil War.

And this it has, profoundly, majestically, meaningfully. But over the years, the 'Memorial Avenue Corridor' has become so much more: not only as an integral part of the nation's architecture of remembrance, but as a profound memorial for veterans, for families of the fallen buried at ANC, for all Americans who honor and cherish the service rendered by our troops. The monstrously inappropriate size of this 'triumphal arch' will block this sightline, destroying the visual connection and its symbolic memorial to sacrifice, honor and valor.

NCPC must stop this obscene proposal before it is ever built. And before it can further desecrate the brave men and women who are buried at Arlington National Cemetery.

REMARKS TO NCPC ON PROPOSED TRUMP ARCH
JUNE 23, 2026

- Such important, enduring monumental undertakings should undergo a careful review by concerned stakeholders, to include veterans and their families, local residents and the general public, historians, architects and our local and congressional representatives, and Section 106 stakeholders.

- In particular, Congressional consideration and approval of such monuments is essential to the capital's national character and broad public support and legitimacy.

- Integrity Matters. Failure to proceed in keeping with the integrity of the statutory and congressional process will profoundly undermine the integrity of the result and its durability.

I read the 185 page report and many significant issues remain outstanding and need to be addressed before proceeding further.

- As a proud Vietnam vet, I recall the early, intense controversy surrounding the design and construction of the Vietnam Veterans Memorial. An often painful process of discussion and debate nonetheless produced an outcome with broad public acceptance and veteran support making it one of the most revered and visited sites in Washington, DC.

- Such a deliberative, consultative process about this planned arch could lead to a more lasting and positive result than a rushed top-down imposed outcome that is broadly and intensely opposed as illustrated by public comments to date.

Lastly, I urge members to walk the hallowed ground at Arlington National Cemetery to feel the impact of this monumental arch - -

especially on internment ceremonies and gravesite visitation and access.

As a combat veteran, I feel a duty to protect the memory and honor the sacrifice of my comrades and all those buried there. This vainglorious monumental arch does neither.

Thank you

July 8, 2026

Dear Commissioners,

Thank you for listening to my testimony.

I am Neil Rocklin. Three and a half years ago I was elected to serve as Commissioner for ANC 2F02.

Last month I attended the National Capital Planning Commission meeting. I heard testimonies regarding the Monumental Arch and returned to my District planning to poll my constituents to gather their opinions about The Arch, and I asked if they desired for me to testify before you. It was unanimous. All respondents wanted their voice to be heard, and all were opposed to the Monumental Arch.

On July 2, I read in the Washington Post, "D.C. Official tells Trump to build his arch somewhere else." Then, I reviewed all my constituents' opinions to discover what was the basis for their opposition. My constituents objected to:

1. the Monumental Arch blocking the sight lines from the Lincoln Memorial to the Lee House, destroying the solemnity of Arlington National Cemetery,
2. the scale of the Arch exceeding the height restriction, dwarfing The Lincoln Memorial,
3. the unclear intent and meaning of The Arch.

These objections would be mitigated by placing the Arch in an alternate location, "specifically at the newly created oval marking the arrival of South Capitol Street and the Anacostia River... It would create an energizing focal point for a still-emerging neighborhood, suitable for a celebratory crowd" as shared by the District of Columbia State Historic Preservation Officer, David Maloney, in his June 26 letter to the National Park Service.

I conclude that by adopting the recommendation for an alternate site, The Monumental Arch would not become an object of divisiveness and win the support of my constituents serving to unite people in the District of Columbia and become another reason for citizens throughout the country to visit their nation's capital.

Thank you for your attention and consideration.

Neil Rocklin
Commissioner ANC2f02

Updated: July 7, 2026

National Capital Planning Commission (File Number 8778)

Subject: Triumphal Arch – Oral Testimony on 9 July 2026 (with additional notes and sources included as an Appendix)

My comments today focus on the Section 106 Review Results and the Executive Director's Summary. They are informed by recent conversations with multiple members of Congress, as well as Gold Star family members. I've been encouraged to speak out by all of them, to inform more of the American People about how the Arch would harm these hallowed grounds. Even former Washington Post Publisher Don Graham weighed in on this in a Facebook Post¹, encouraging residents and Visitors to Washington to view the Eternal Flame at night from the Potomac Waterfront, before the Arch or its lighting blocks that uniquely Washington experience, this viewshed.

I am a Retired Army Officer and a Washingtonian. My parents, interred in section 66, were a Vietnam Veteran and his "Army Wife", a Nurse. My wife served for 9 years and is a Combat Veteran of the Persian Gulf War.

I visit the Cemetery often and have walked to the ground at the affected locations on multiple occasions, including all of the documents provided in support of this meeting.

I would happily walk these grounds again with anyone who is interested, because seeing in person and hearing Veteran stories is essential to understanding the issue.

1. **The Direct Effects Boundary in Drawing #1 is misleading and should be Re-drawn to include all locations inside Arlington National Cemetery that would have "line of sight" to the Arch.** The Assessment of Effects Report defines the Direct Effects Boundary in a way that ignores impacts to Sections 55, 56, 57, 60, 66, 73, 74, 75, and 76, where many Veterans of the Vietnam, Gulf War, and GWOT era are and are being interred or inurned in the Niche Wall. The renderings from the proposed Viewing Platform skip over a portion of the view in the

GARY E. LANGSTON, JR.
Colonel, US Army (Retired)
Washington, DC

Southwest direction looking over these sections and so fail to illustrate the problem. I submitted comments about this to the National Park Service during the Section 106 review, but these have apparently been rejected or not considered. Limiting the assessment to only National Historic Landmarks, without considering the impact on funerals or visits by the living to gravesites in view of the Arch, overlooks the impact on several sections inside the Cemetery.

2. **No “Leaf-Off” Renderings.** Additionally, by not providing “leaf-off” renderings, you are not taking into account the significant changes to the Arlington Cemetery viewshed in Winter. I noted that at least one of the Historic Preservation experts made this same comment. This will show additional impact to the Taft Memorial in Section 30, and sections 36A, 51 and 53 to the North of Memorial Avenue, as well as a more severe impact to sections 55, 56, 57, 60, 66 and 73-76. The effect is that both active funerals and visits by loved ones in these sections will have a Viewing Platform that overlooks many existing, and many yet to be dug, gravesites.
3. Given this, I believe that **Table 1 in the Assessment of Effects Report, with its NRHP Designations, has overlooked an important impact that should be considered.** Just as important as the tone and solemnity of the formal entrance to Arlington Cemetery is, so too is the solemn environment of the actual gravesite locations. This reiterates the issue that the Triumphal Arch is a celebratory monument, not a solemn memorial, and therefore the proposed location - Memorial Circle - is in direct conflict with the Purpose of the Triumphal Arch.
4. Even the NCPC’s own “Memorials and Museums Master Plan”² explicitly states: **“the existing circle at the west end of Memorial Bridge is not viewed as appropriate for the location of a future memorial.”** Instead, it identifies, as Prime Location #1, the area nearby the Spanish War Veterans Memorial.³ Not Memorial Circle.

Impact/Why this is Very Important: several Veterans have described this as having the Arch’s Viewing Platform “Looming Over” the graves of their loved ones, spoiling the experience.

GARY E. LANGSTON, JR.
Colonel, US Army (Retired)
Washington, DC

My written statement includes photos and maps to better illustrate the problems I have just described.

5. As many of you know, 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, while first "doing no harm."
6. The best way ahead is to **fully collaborate on site selection and design with affected stakeholders (as the Section 106 process is intended to do), and present the project to the American People via the Congress for approval. The NCPC's own Master Plan lays this out very well.**

The NCPC should REJECT this site because it is NOT suitable for any sort of Triumphal Monument, for the reasons stated above.

I know that many Commissioners, Staff, and NPS personnel working on this project are Veterans themselves, or have family interred at Arlington, or both, and are under pressure. Thank you all for your service.

I welcome your questions and would welcome the opportunity to walk with anyone to the several sections I mentioned in my comments.

With Respect,

/s/

Gary E. Langston, Jr.

Appendix: Additional Detail and Endnotes

Appendix: Additional Detail and Endnotes

Regarding Comments 1-3:

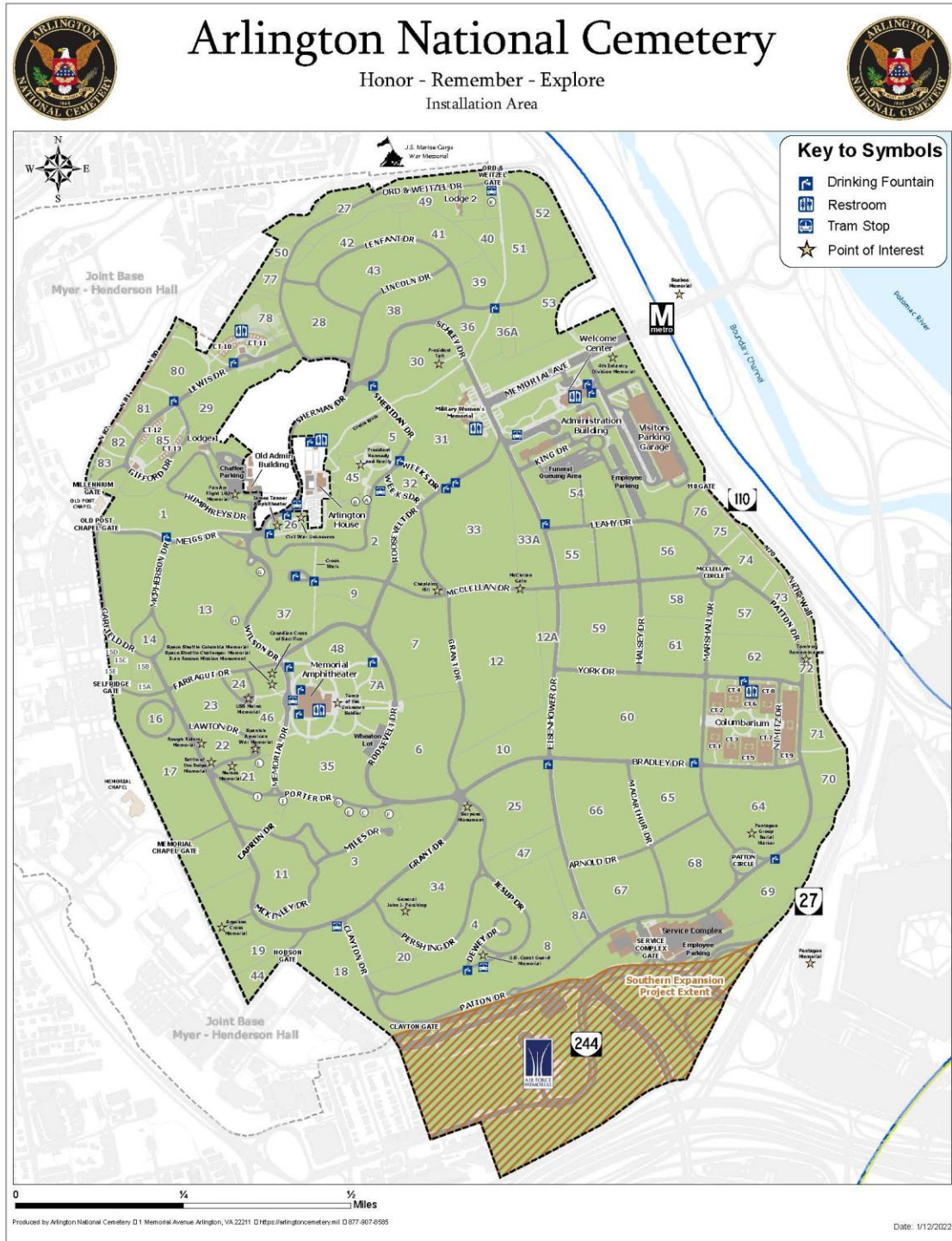
This photo was taken on May 31, 2026, overlooking Section 75 in the Northeast direction. There is no equivalent rendering in the project documentation. The Niche Wall containing cremated remains can be seen along the tree line at the boundary of the Cemetery. The Washington Cathedral and Rosslyn are visible in the far background. The top of the Lincoln Memorial is barely visible between some of the treetops. Without professional renderings, it is difficult to appreciate how much of the Arch will be in view from this location, with and without leaves on the trees. There are frequent funerals in this area, in fact many recent nearby graves, just out of frame of this photo, are currently awaiting installation of headstones.



Section 75 Viewshed Looking Northeast – What is the Arch Impact Here?

GARY E. LANGSTON, JR.
Colonel, US Army (Retired)
Washington, DC

The Sections I called out in my remarks include (Leaf On and Leaf Off): 55,
56, 57, 60, 66, 73, 74, 75, and 76. With Leaves Off: 30, 36A, 51, 53⁴



GARY E. LANGSTON, JR.
Colonel, US Army (Retired)
Washington, DC

Regarding Comments 1-3 (cont'd):

Should this undertaking proceed, it is my strong belief that the Viewshed in this area will be severely impacted by the installation of a Triumphal Arch (even more so in Winter than this photo would suggest). To make matters worse, many of the recent graves in this area contain the remains of our Vietnam Veteran cohort, the vast majority of whom were drafted, and then returned to a country that did NOT appreciate their service (to say the least). Several of them have remarked about the fact that while they were drafted and served, our current President (and his family) did not.

Others, including a Gold Star Mother of a son who lost his life in Afghanistan I was honored to speak with, remarked that she is offended by the idea that tourists on a viewing platform would be able to look down upon her as she visits her son's grave (in Section 60).

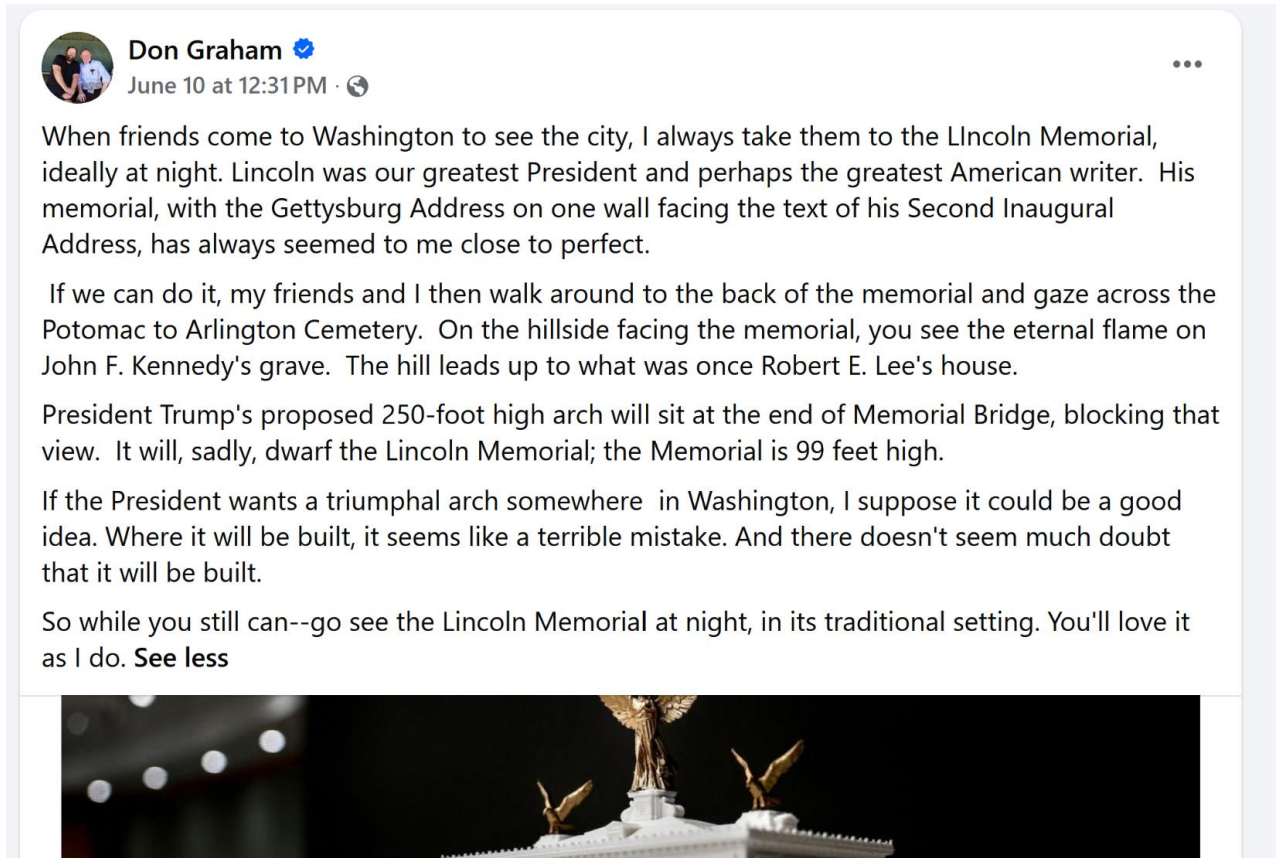
Given this, it's vital that a much more thorough review of the impact to the interior of Arlington Cemetery be performed with cemetery personnel, historians (including military historians) and docents, and perhaps even Ladies of Arlington who are the most intimately familiar with both the grounds as well as funeral operations, but most importantly with the families of veterans, and veterans themselves who may be considering Arlington as their final resting place.

Regarding the Eternal Flame at Night, from a Distance:

Shortly after seeing Don Graham's post on Facebook (below), my wife and I took his advice viewed the Eternal Flame at night – we were able to see the Flame from several locations on Memorial Bridge that would be physically blocked by the Arch columns. Additionally, there are great views from multiple locations along the Potomac Waterfront, including the Lincoln Memorial, but also the Watergate Steps. We believe these views will be overwhelmed by Arch lighting, and we agree with Mr Graham: go see it now before construction starts, because it's likely to be gone forever.

GARY E. LANGSTON, JR.
Colonel, US Army (Retired)
Washington, DC

We were not the only people out that night taking Mr Graham's advice.



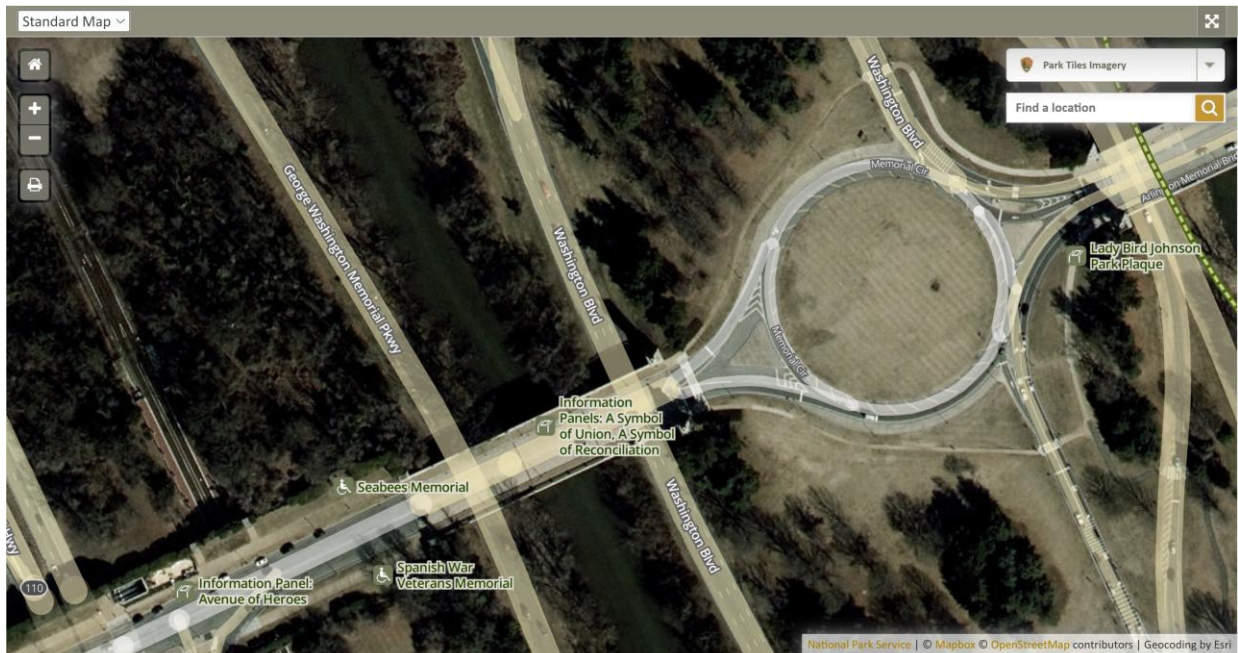
ENDNOTES

¹ Don Graham's Facebook Post elicited, as you might expect, a lot of sentimental comments from the public. This public post can be viewed at:
<https://www.facebook.com/search/top/?q=don%20graham%20eternal%20flame>

² The NCPC Memorials and Museums Master Plan (a living document), is online at: <https://www.ncpc.gov/plans/memorials/>

³ The location of Spanish War Veterans Memorial (sometimes referred to as "The Hiker", is depicted in the screenshot from the current National Park Service map below. <https://www.nps.gov/gwmp/planyourvisit/maps.htm>

GARY E. LANGSTON, JR.
Colonel, US Army (Retired)
Washington, DC



Above: Current Map of Memorial Avenue and Memorial Circle

Below: Primary Site #1, NCPC Memorials and Museums Master Plan Page 35

Memorial Avenue at George Washington Memorial Parkway

Site 1 35

Commemorative Opportunity:

Jurisdiction: Federal – National Park Service

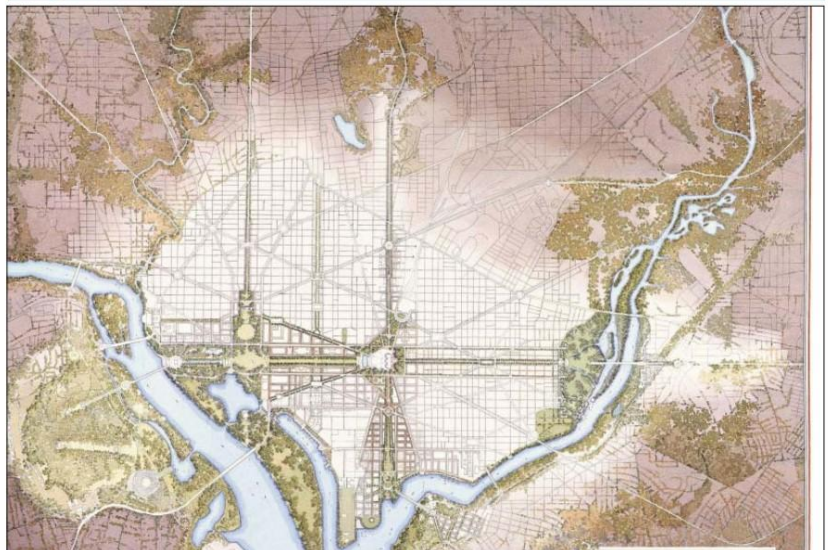
A primary memorial site opportunity exists in association with Memorial Avenue. Although the existing circle at the west end of Memorial Bridge is not viewed as appropriate for the location of a future memorial, a major destination site opportunity exists to the west of the circle on the Virginia side of the channel.

The destination memorial site is estimated at from two to four acres. While memorial development would not likely require many physical improvements in the site vicinity, development could require upgrades to existing utilities.

Site development can both enhance existing parkland and complement the existing memorials along Memorial Avenue toward the entrance of Arlington National Cemetery.

A memorial at this location could enhance design principles of the McMillan Plan including the historic built environment of Memorial Bridge and Memorial Avenue without competing with existing memorials.

Design Considerations:



⁴ A current Map of Arlington National Cemetery Sections can be viewed at:
<https://www.arlingtoncemetery.mil/Visit/Map-of-ANC>

Linsay Burnett NCPC Testimony
July 9, 2026
Re: New Monumental Arch

My name is Linsay Burnett. I was a combat photographer and public affairs sergeant with the 1st Brigade Combat Team, 101st Airborne Division, deployed to Iraq in 2004. One day I may be laid to rest at Arlington, across the river from where you propose to build. I am also the daughter of two retired National Park Rangers, who spent their careers protecting places like this one across our country. I come to you as the person this arch claims to honor, and the person raised to protect what it would destroy. It betrays both.

The Park Service's own report says this can be built twenty hours a day, year round, for up to three years, under cranes taller than the arch itself. Arlington buries its dead close to thirty times a day. Under this plan, families would lower their loved ones into the ground to the sound of pile drivers. Taps against a concrete pump. We ask our dead for everything. The least we owe them is silence, and for three years we would deny them even that.

You may look at Memorial Circle and see empty lawn. It is not empty. It was left open on purpose. Ninety years ago, two columns were approved for that spot and never built. Fourteen feet across, set hundreds of feet apart, they would not have touched the view. The open ground is the design. It lets the line between the Lincoln Memorial and Arlington hold its meaning, a country made whole after the Civil War. And the excuse for skipping Congress is that same permission, for columns we were wise enough never to raise.

Free nations build arches to the dead. In Belgium, the Menin Gate is a triumphal arch carved with fifty-four thousand names of the missing, and every night a town stops its traffic to sound the Last Post beneath it. America's own law carries the same instinct. The Commemorative Works Act forbids a memorial to any person until twenty-five years after their death, so that history, not vanity, decides. America does not build monuments to its living rulers. Dictators do. Kim Il-sung built one in Pyongyang for his birthday. Saddam built one in Baghdad, cast from molds of his own arms. Asked by CBS's Ed O'Keefe who this arch was for, President Trump said, "Me." America does not gild the living.

On June 4th, this commission refused to approve the arch. You demanded answers from the Interior Department, on the height under the Height of Buildings Act, on the danger to air traffic, on pedestrian safety. Those problems have not been cured, and the deepest ones cannot be. Congress has never authorized it. The design was sole-sourced through an unrelated contract, to avoid open bidding. And Interior now swears it is "not a memorial," even as the President calls it his, so it can slip past the Commemorative Works Act entirely.

This is National Park Service land, the ground my parents gave their careers to keep, in the words of the Park Service's own founding law, "unimpaired for those who come after us." Your commission has its own charge, to protect the design of this city. Reject this arch.

Thank you.



NCPC SPOKEN TESTIMONY

National Capital Planning Commission

July 9, 2026

Edward Stierli, Mid-Atlantic Senior Regional Director

National Parks Conservation Association

Good afternoon and thank you for the opportunity to speak today. I'm Ed Stierli with the National Parks Conservation Association. We are a nonpartisan organization with 1.9 million members and supporters, and we have advocated for the national parks of this region for decades.

Let me say at the outset that NPCA supports commemorating the 250th. We support investments that honor American history and strengthen our parks. That is not what is before you today.

First and foremost, Congress has never authorized this work.

The Commemorative Works Act allows a commemorative work on Park Service land here only as specifically authorized by law. The authorization cited for this project dates to the 1920s. It directed a commission that no longer exists to place two decorative columns at the bridgehead, within a spending limit that has long since been spent. Those columns were never built.

Whatever that provision once contemplated, it was not a 250-foot arch and cannot provide the authorization the Commemorative Works Act requires today. The District's preservation officer put it plainly. This would be the largest and most visible memorial constructed in this capital since the Washington Monument. Only Congress can decide whether such a work belongs here.

Second, the environmental review has real holes in it.

The Environmental Assessment examines exactly two alternatives: build it or do nothing. No alternative sites. No alternative designs. No reduced heights. For a project of this magnitude, that is not an alternatives analysis.

The document concedes the arch would obstruct the reciprocal view between the Lincoln Memorial and Arlington House. It identifies adverse effects to at least six National Historic Landmarks and describes caissons drilled 75 feet to bedrock, cranes rising 320 feet, construction up to 20 hours a day for two to three years, and 80 to 100 truckloads a day at the gateway to a cemetery where 30 funerals are conducted every weekday.

In this case, impacts of this significance require a full Environmental Impact Statement.

Additionally, the historic preservation review has been compressed, and it left out the people with the most at stake.

Virginia's Historic Preservation Officer described the consultation as a fait accompli and noted that the applicant's plans were already marked "released for construction." The District's preservation officer had never been contacted about this project until June 5, and declined to concur in the draft Programmatic Agreement.

NATIONAL PARKS CONSERVATION ASSOCIATION

777 6th Street NW, Suite 700, Washington, DC 20001 | 800.628.7275 | nps.org



No veterans organization was named a consulting party. Not one. At the gateway to Arlington.

The public was given ten calendar days to review more than 180 pages of technical material. In those ten days the Park Service received more than 100,000 comments, overwhelmingly opposed.

A ten-day comment period and a consultation that excludes veterans is not the deliberate process these landscapes have always been given.

NPCA is a consulting party in the Section 106 review of the White House visitor screening facility. That process has worked. Relevant partners were brought to the table early, concerns were heard, alternatives were considered, and historic resources around it will be better protected. This administration has shown it can build and preserve at the same time when the consultation is given room to function.

We ask the Commission to decline approval of the preliminary site and building plans until that record exists: congressional authorization under the Commemorative Works Act, an Environmental Impact Statement with NCPC as a cooperating agency and a genuine analysis of alternative sites and designs, and a Section 106 process with a meaningful comment period and full participation.

The National Mall, the George Washington Memorial Parkway, and Arlington National Cemetery are the products of generations of deliberate planning and public stewardship. This Commission has the authority to insist on a complete record before it acts. We respectfully urge you to use it.

Thank you.

Testimony to the National Capital Planning Commission – July 9, 2026
Re: New Monumental Arch (File number: 8778)
Peggy F. Barlett

My parents' and grandparents' remains are at Arlington National Cemetery, and I treasure the quiet dignity of this site. Visible from many vantage points, it is elegant and spacious, yet connected to the monuments across the beautiful river.

The New Monumental Arch, as proposed, will clash with these surroundings. It is much too big. Its design is fussy, imitative, and intrudes on the harmony of the surrounding area. A female figure with wings and two enormous birds are not consistent with the dignity of the Jefferson and Lincoln memorials. The scale of the arch contaminates the sightlines from both sides of the bridge and seeks to dwarf and intimidate the visitor.

I share concerns about lighting such a tall and intrusive structure, requiring perhaps eight 20-foot-tall light stanchions and the pinnacle red blinking aviation lights recommended by the Federal Aviation Administration. I share the concern that the project as conceived may violate the lighting hierarchy of the National Mall.

I also am concerned with pedestrian safety for visitors since the arch is located in the middle of a busy traffic circle. The addition of traffic lights addresses pedestrian safety but will also cause significant traffic delays. The proposed 32 traffic signal poles do not support a serene environment.

Such a construction is fundamentally flawed. It is egotistical in size and ambition and is jarring to the aesthetics of the Mall area. I urge you to reject this proposed design as not in keeping with Arlington's solemn memorial to service and sacrifice.

Good evening.

My name is **Kristopher Reichert**. I grew up in Arizona and have called the Washington region home for the past eight years.

I was raised in the tradition of Barry Goldwater, John McCain, and Jeff Flake, Republicans who believed conservatism was defined not by loyalty to a person, but by fidelity to constitutional principles. Today, I consider myself an Eisenhower Independent because I believe that kind of principled, steady leadership is becoming increasingly difficult to find in either political party.

I am here to oppose the proposed Monumental Arch.

Not simply because of who occupies the White House today, but because of what this proposal signals to every administration that follows.

One of the enduring traditions of the American republic has been restraint in elevating sitting presidents through permanent national monuments and civic symbolism. Our greatest memorials emerged through time, public consensus, and history's judgment, not the preferences of those holding office.

That tradition reflects a fundamental American principle: our institutions, our symbols, and our nation are larger than any one individual.

History reminds us that governments centered on strong personalities often intertwine the identity of the state with the identity of the leader through monuments, architecture, and civic symbolism. We saw it in Stalin's Soviet Union, Hitler's Germany, Mussolini's Italy, Mao's China, and countless other authoritarian regimes. America has always sought to be different. We rejected kings. We rejected personality cults. We built a republic where the Constitution, not a single individual, is meant to endure.

I will acknowledge that restoring monuments and fountains throughout our capital is a worthwhile goal. But restoration cannot stop at the surface.

Fresh paint, restored fountains, and polished stone are welcome, but they remain cosmetic if we ignore the deeper work of strengthening the institutions, civic trust, and democratic norms that made those monuments worth building in the first place.

The greatness of our capital has never come from marble alone. It comes from the principles it represents.

President Dwight D. Eisenhower once said, ***"A people that values its privileges above its principles soon loses both."***

No administration, regardless of party, should claim the privilege of permanently reshaping America's monumental core without first demonstrating the principled restraint that has defined our Republic for nearly 250 years.

I respectfully ask the Commission to reject this proposal.

Thank you.

Stephanie J. Fisher-Gold Star Mother

ARMY SSG. Thomas Kent Fogarty

KIA 06MAY 2012-interred Section 60 ANC

OBJECTION to Proposed 'Triumphal Arch'

To those concerned my name is Stephanie Fisher and I have been a Gold Star Mother for over 14 years now. My son, ARMY SSG Thomas Kent Fogarty is buried in Section 60 of ANC. He died in a roadside bomb attack in Afghanistan while serving his 3rd deployment to OIF and OEF. He was 30 yrs old and left behind 2 young sons ages 3 and 5 yrs old.

Over the years I have brought his boys multiple times to Arlington to visit their fathers grave. I needed to explain where their Daddy was, to tell them his story and why he volunteered to be a soldier. I wanted to console them by letting them see that he was resting in a very beautiful and special spot reserved for the heroes in our country. I wanted them to know exactly where to find him in the years to come.

The choice to bury our son so far from home was a solemn one, but I needed to insure he was where he would want to be. With his fellow soldiers on sacred ground that defines our country. Arlington epitomizes and honors the sacrifices made in human flesh by our nation, and many have died defending our Democracy and upholding the Rule of Law outlined by our Founding Fathers.

When I visit Tommy's grave I always gaze out to the vistas of the greater DC. I focus on the Capitol and the Lincoln Memorial. Seeing them clearly always gives me so much comfort and pride and renews my strength. But most of all, it gives me SOLACE.

I cannot describe to you what a balm that is to my broken heart.

The architects of Arlington were geniuses in their design, anyone tampering with that demonstrates a complete lack of hubris. The audacity of putting any structure in Memorial Circle shows a complete lack of respect for ANC.

The Circle is brilliant in its simplicity. It is not just open land left for a builder's whims. It needs nothing and serves several purposes. Coming off the bridge the open vista draws you down Memorial Drive to where Arlington House and the eternal Flame glows by its side. That flame is the heartbeat of Arlington National Cemetery, our country, and what we stand for. To obscure it, to lessen it, to detract from it is beyond my comprehension!

On a practical note, the Circle and traffic lanes need clear views for safety for drivers and pedestrians who cross the bridge. Picture that area congested with more foot traffic, a possible parking area to see the thing up close would likely be needed, It would likely need traffic lights to accommodate the spectacle.

Memorial Drive is its own sacred spot on the entrance to the cemetery. The magnificent Division sculptures that line both sides of the drive are the powerful and silent sentinels who stand an unwavering guard over the graves of those who served them in both War and Peace.

Imagine them being dwarfed by a massive Las Vegas Strip hotel type monstrosity. Ostentatiousness does not belong anywhere near this place in my opinion.

Along with many other views and vantage points outward from the cemetery I lastly think of the sightlines from the hill where Arlington House presides and the Eternal Flame burns for us beside it. I cannot imagine standing up there in the future, looking out over our beloved Washington DC, the river, and all the vistas beyond, and seeing any Arch. It is massive. It would have to have lights on top due to air traffic. It is undignified.

It will block the clear view of the bridge, altering traffic and pedestrian traffic. Logistically there would have to be traffic lights to restrain the drivers who can no longer clearly see what is going on in the traffic roundabout. There would be no more roundabout. It would become an intersection. A gaudy and misplaced spectacle.

The other terrible fear is if the current POTUS who is proposing this project erected a statue of himself there or decides that will be his royal crypt. I hope with all my heart this project or any variation of it never comes to fruition. Sincerely, Stephanie Fisher

Comments for the National Capital Planning Commission

The National Mall is America's sacred ground. It marks our victories and mourns our defeats. It inspires humility through the weight of its dignity. It achieves grace by modesty—the understatement that could represent the sacrifice of war in a marble wall or kneeling statute; the anguish and redemption of emancipation in a solitary mausoleum. This is a dignity worth preserving.

In this sacred space, the proposed Monumental Arch would be an obscenity. It would tower over the Lincoln Memorial. It would suggest, by juxtaposition, that the accomplishments of past generations are somehow inferior, or that their quiet dignity was weakness. The opposite is the case.

Most concerning, the Monumental Arch would stamp the Mall with the architecture of despotism. It would impose a sad, faint echo of tyrants like Napoleon and Trajan who left the world burning in their wake. That may be President Trump's preferred legacy. But it should not be America's.

Respectfully,

Sam Van Kopp



National Trust for
Historic Preservation
Save the past. Enrich the future.

**Public Testimony of Rob Nieweg
Senior Vice President of the National Trust for Historic Preservation
Before the National Capital Planning Commission
Regarding the New Monumental Arch Proposal**

Thursday, July 9, 2026

Good afternoon, Mr. Chairman and Members of the National Capital Planning Commission.

My name is Rob Nieweg and I speak here today on behalf of the National Trust for Historic Preservation, as the Trust's Senior Vice President for Preservation Initiatives. We're grateful for this additional opportunity to provide input on the New Monumental Arch proposal.

The National Trust already shared serious concerns with this Commission about earlier iterations of the proposal. To be clear, we strongly oppose construction of the Monumental Arch at this location for the following reasons:

First, the location and scale of the Arch would overwhelm nearby historic landmarks such as the Lincoln Memorial, Arlington House, and Memorial Bridge. It would be inconsistent with the solemn character of Arlington National Cemetery, and would mar the highly-meaningful vista across Memorial Bridge, which has long been defined by restrained grandeur in its memorials, and long open sightlines honoring the veterans buried at Arlington and national reunification after the Civil War.

Second, the proposal is inconsistent with Washington's urban planning framework. This Commission has applied the Height of Buildings Act to federal projects for the last 88 years. The result is a capital city beloved for its low horizontal skyline that rightly emphasizes the U.S. Capitol Building and the Washington Monument. We support the staff legal analysis that continues to apply the Height Act to federal projects. Abandoning this approach now would upend a consistent urban planning principle that has been a century in the making.

Third, federal law requires the review of the proposed Arch under Section 106 of the National Historic Preservation Act to be completed "*prior*" to approval by NCPC and other



National Trust for Historic Preservation

Save the past. Enrich the future.

agencies. The purpose of this review is an important one – to ensure that new construction does not needlessly harm the nation’s historic places without at least considering less harmful alternatives. While we were pleased to see this Section 106 process *begin* in recent weeks, we are deeply concerned about the limited nature of the consultation, the rushed timeline, the exclusion of many parties (including the National Trust) from the consultation process, and the failure to consider less harmful alternatives. We urge this Commission to fully consider the Section 106 findings before granting final approval.

Fourth, egregious flaws and significant uncertainties remain in the updated proposal under review today. Each new rendering submitted for this project underlines our primary concern, that the Arch proposal is totally inappropriate in its scale and location. The new images clearly show that the Arch blocks the view of the Lincoln Memorial from vantage points on the Virginia side. It looms larger on the skyline than everything other than the Washington Monument. From the District side, placing the Arch in the foreground completely overpowers the sacred rolling wooded hills and rows of white grave markers at Arlington National Cemetery.

Fifth, we disagree with the argument that the proposed Arch is not subject to the Commemorative Works Act. The Arch requires the approval of Congress, which has not yet been obtained, and we urge the Commission to proceed with your review in accordance with the requirements of the Commemorative Works Act.

We also support the suggestion by the DC State Historic Preservation Officer to consider alternative locations that would be more appropriate for this project. In a June 26 letter the SHPO proposed shifting the Arch to the base of South Capitol Street at the Anacostia riverfront. Moving the project to this location would avoid adverse effects on existing memorials. This location would also place the Arch on a direct axis with the U.S. Capitol Building, and would create a celebratory focal point for the bustling neighborhood that continues to emerge between Audi Field and Nationals Park. It’s a much more inviting and hospitable place for crowds of visitors to see the Arch. We urge the Commission to give serious consideration to this much less harmful alternative.

Thank you for considering the views of the National Trust for Historic Preservation.



Testimony Before the National Capital Planning Commission

**Rebecca Miller, Executive Director
DC Preservation League**

**NCPC File Number: 8778
New Monumental Arch
Memorial Circle, George Washington Memorial Parkway, Washington, DC**

Good Afternoon, Chairman Cook, and Members of the Commission:

My name is Rebecca Miller, Executive Director of the DC Preservation League (DCPL). Founded in 1971, DCPL has spent more than five decades advocating for the protection of Washington's historic and built environment. Thank you for the opportunity to testify today.

I am testifying today to express the organization's opposition to both the proposed construction of a monumental triumphal arch within Memorial Circle and the National Park Service's (NPS) deeply flawed handling of the Section 106 review process under the National Historic Preservation Act (NHPA).

The proposal to insert an oversized, historically discordant triumphal arch into Washington's meticulously planned landscape represents a profound misunderstanding of the city's civic architecture. This landscape is defined by the L'Enfant and McMillan plans, which emphasize open vistas and democratic symbolism.

As we have stated previously, the "precedent" images shown by the architect were never built and do not justify this current concept. There are hundreds, if not thousands, of unrealized sketches for areas of Washington, these are not precedent either. Forcing a triumphal arch into this context ignores the capital's unique cultural landscape.

The applicant's assertion that the 1910 Height of Buildings Act does not apply to federal buildings and memorials is false. When Pierre L'Enfant designed Washington, DC in 1791, he envisioned a grand, horizontal city modeled after Paris, featuring wide avenues and clear sightlines radiating toward monumental public buildings.

While the McMillan Plan of 1902 was a visionary report and not a binding law, it completely shifted the political climate in Washington. When Congress drafted the revised Height of Buildings Act of 1910, lawmakers used the exact aesthetic logic of the McMillan Plan to justify the math, cementing the plan's horizontal, European-style vision into law. The 1910 Height of Buildings Act rendered the 1899 law moot, and specifically states that "No building shall be erected, altered, or raised in any manner to exceed the height of one hundred and thirty feet on a business street or avenue as the same is now or hereafter may be lawfully designated, except on the north side of Pennsylvania avenue between First and Fifteenth

streets, northwest, where an extreme height of one hundred and sixty feet will be permitted." There is no exception for federal buildings or monuments. To diminish this federal law to simply one that limits DC Zoning is not correct. Not only does the DC Government have no ability to change this law, but exempting this project from the Act would set a precedent that would unravel more than a century of careful planning and practice by this commission.

I will move on to the regulatory vehicle by which the NPS is attempting to bypass public accountability. This Section 106 process hasn't devolved into a bureaucratic farce—it started as one! It is clearly an exercise designed to shield this controversial project from genuine public and expert scrutiny, rather than to reduce its harmful impacts on our shared heritage, which is owned by the public.

Under 36 CFR § 800.2(c)(5), the regulations explicitly state that organizations with a demonstrated interest in the preservation of historic properties or with local expertise "shall be invited to participate" as consulting parties based on their relationship to the undertaking. The DC Preservation League, established in 1971, is Washington's leading citywide historic preservation advocacy organization. For over half a century, DCPL has worked collaboratively with federal agencies, including the NPS, to steward the capital's historic resources. To ignore DCPL's request for party status or to contend that DCPL lacks a "demonstrated interest" or relevant expertise to consult on a monumental intervention of this scale is a bad-faith assertion that defies reason. By systematically denying consulting status to DCPL and other preservation non-profits, NPS has insulated itself from expert criticism and effectively eroded the local preservation community's ability to participate in a process specifically designed to protect public resources. The agency's refusal to allow these entities a seat at the table confirms that the NPS is not seeking open consultation, but rather a manufactured consensus. This approach violates both the spirit and the letter of the National Historic Preservation Act.

The implications of this heavy-handed maneuver extend far beyond the immediate threat of the triumphal arch. If allowed to stand, this exclusion sets a devastating precedent for the future of federal historic preservation compliance nationwide. If the National Park Service—the ultimate custodian of our nation's parks, historic sites, and the National Register of Historic Places itself—can arbitrarily lock out long-established preservation organizations from a Section 106 review, any federal agency can do the same. This action signals that the public and its non-profit advocates are merely impediments to be managed and excluded, rather than legitimate partners in stewardship.

To retain a semblance of legitimacy, the National Capital Planning Commission, which has Section 106 authority, should take over this process to ensure it is carried out in a manner that includes site alternatives, minimization alternatives, and inclusion of consulting parties like the DC Preservation League and other non-profit preservation organizations that have requested inclusion. The Section 106 process should be reset, and the review of alternative sites should begin, as has happened for other major memorials or monuments.

The cultural landscapes of our nation's capital belong to the American public, not to any single administration or individual's whims. It is crucial to address this mockery of a process before irreversible damage is done to our historic and built environment, as well as to the integrity of the regulatory framework designed to protect it.

For the above reasons, DCPL encourages you to reject this proposal.

Thank you for your time and attention to the views of the DC Preservation League.

Thank you for the opportunity to speak. I am Geoffrey Barron, on behalf of Third Act DC. Third Act is a *national* organization mobilizing older Americans to help protect our climate and our democracy. Founded four years ago, the organization includes 100,000 volunteers in 29 states. *Third Act DC* is the organization's DC chapter, with 1200 local members.

We members of Third Act DC join the many hundreds of individuals and organizations who overwhelmingly have made it clear in testimony before the Commission of Fine Arts and before you, that we do not want an arch at Memorial Circle. It will take over, block, and dominate the vistas and the reverential spaces of and between the Lincoln Memorial and Arlington Cemetery that planners designed and visitors have cherished for generations.

In addition, I speak here in line with Third Act's mission to protect democracy.

In 1986, the US Congress passed a law, the Commemorative Works Act, specifically to ensure democratic accountability and participation in the approving of new monuments in Washington. Yet the Trump administration is coming to your commission, and mounting a legal battle, not to follow the intent and guidelines of that legislation, but rather to attempt an end run around it. And, as with the demolition of the East Wing of the White House, is already having initial work done at the site.

As we celebrate our 250th anniversary, I trust that everyone in this room cherishes Lincoln's vision of our government as "of the people, by the people, and for the people." We elect presidents in the hope and trust that they will forward this vision and work on behalf of all Americans. That is their job. But that is not what President Trump is doing with this arch. He is attempting to impose **his** will and **his** desires on the American people and the people of Washington.

Our monuments, like our government, *should be* of the people, by the people, and for the people. When a leader attempts to impose his will on his people without their consent, when he uses the powers of his office to try to skirt the law or act in spite of it, we call that authoritarianism. We could also call it bullying.

A monument that is erected through bullying will be resented and reviled by the people it is imposed on. Do you commissioners want to be a part of that?

Thank you.



July 9, 2026

New Monumental Arch
NPCP File Number: 8778
Agency: US Department of the Interior
Re: Prepared Testimony for the National Capital Planning Commission Meeting

When President Trump first unveiled a model of the proposed triumphal arch, a reporter asked him a simple question: “Who is it for?” His answer was just as simple: “Me” he said.

That answer should tell us everything we need to know. Our public lands are not there to serve the vanity of any president. They belong to every American, and they should be managed with future generations in mind.

As the Campaign Director for the Sierra Club’s Outdoors for All Campaign, I spend every day working to expand access to our public lands while protecting the places that make those experiences possible.

Across the country, America’s national parks are facing a crisis. The Trump administration has cut National Park Service staff through widespread reductions in force even as parks continue to welcome millions of visitors every year. Visitors are seeing the consequences as fewer people are left to care for the places they came to experience.

Now, instead of directing resources toward those parks, the administration is taking money that visitors paid through National Park entrance fees and redirecting it to Trump’s personal vanity projects in Washington. Trump’s proposed arch is simply the latest example of those misplaced priorities.

Americans pay those entrance fees because they expect that money will be used to care for the parks they visit. They expect it will preserve historic places, improve visitor experience, and protect these landscapes for future generations. That is not what is happening.

This proposal would permanently alter National Park Service land that frames the entrance to Arlington National Cemetery. At 250 feet, the proposed structure would be twice as tall as the Lincoln Memorial, and would block the line of sight that connects the Lincoln Memorial with the entrance to Arlington. This is the gateway to Arlington National Cemetery where more than 400,000 servicemembers are laid to rest. It is a place that calls for thoughtful stewardship and deep respect.

Jackie Ostfeld
Outdoors for All Director
Sierra Club

TESTIMONY OF DAVID SCOTT PARKER TO THE NATIONAL CAPITAL PLANNING COMMISSION

HEARING ON JULY 9, 2026, regarding the proposed “NEW MONUMENTAL ARCH”

Thank you, Chairman Scharf and Commission members.

I’m David Parker, a practicing architect and preservationist for 35 years and Fellow of the American Institute of Architects. I spoke to you before on this application but would like to make additional observations and recommendations based upon recent reports from various agencies and parties consulting on NEPA compliance and the NHPA Section 106 review:

First, the proposed LOCATION at Memorial Bridge between Arlington National Cemetery and the Lincoln Memorial is highly problematic, and the adverse impacts it will create cannot be mitigated. The NEPA Compliance Table in your current documents lists 299 National Register Contributing Resources that could be adversely affected by this project, including sacred and solemn places like the eternal flame in Arlington National Cemetery from which views will be impaired. *(NPS, Assessment of Effects Report, Appendix D)*. The current NCPC Executive Director’s Report acknowledges that the proposed arch will “*Fully obstruct reciprocal views of the Lincoln Memorial and Arlington from the higher elevations of Arlington House and the Lincoln Memorial terrace...*”. The arch in this location will be a direct violation of the McMillan Plan and of the most basic rationale for placement of the Lincoln Memorial and creation of Memorial Bridge, which were “*designed to create a physical and symbolic connection between the North and South.*” The arch would be an imposition and impediment interrupting the solemnity of this nationally significant historic setting. Furthermore, it should be noted that the 2001 Memorials and Monuments Master Plan prepared by NCPC in cooperation with the Commission of Fine Arts and the National Capital Memorial Commission specifically states that “*the existing circle at the west end of Memorial Bridge is NOT viewed as appropriate for the location of a future memorial...*” *(Master Plan at p.35) (emphasis added)*.

Second, the SYMBOLISM of the proposed arch itself is contradictory and incongruent in this place. “TRIUMPHAL” arches throughout history have, according to Roman history scholar Aaron Poplin been built to “present a particular narrative about rulers and nation-states, and not necessarily ones that adhere closely to historical fact.” It is important to note that this arch is proposed as a “monument” rather than as a “memorial”. The essential difference is that monuments are built for admiration and historical CELEBRATION, while memorials are built for respectful REMEMBRANCE. The historical association of triumphal arches is inconsistent with the vague explanations currently being offered as a rationale for the immense structure in this sacred place.

Third, the HEIGHT of the proposed arch exceeds Washington, DC’s “HEIGHT OF BUILDINGS ACT OF 1910”, which, according to your own General Counsel’s published comments, NCPC has always considered BINDING on Federal projects. The NCPC Executive Director’s Recommendations to make the arch compliant while altering its design to maintain the overall desired height of 250’ would significantly change its proportions while dramatically enlarging and elongating the statuary atop it. These alterations would also undoubtedly require reducing the size of the arch’s opening, thus further diminishing and obscuring the keyhole views that the applicant claims it will frame. It is impossible to evaluate these potential changes without seeing revised drawings and numerous comparative perspective renderings.

Fourth, ALTERNATIVES with less adverse impacts should be considered. As part of the Section 106 review process, the DC State Historic Preservation Officer recently proposed an alternate site for this arch at the 3.1-acre South Capitol Street “Oval” adjacent to the Anacostia waterfront. (see composite image and map below)



AERIAL VIEWS DEPICTING POTENTIAL ALTERNATE SITE ON SOUTH CAPITAL AVENUE

A monument arch at this location would avoid most of the adverse effects on historic places while eliminating interference with established memorials and the solemnity of the Lincoln Memorial and the graves at Arlington National Cemetery. This site would position the arch as a celebratory gateway to Washington on a direct axis with the Capitol building and the new Frederick Douglass Memorial Bridge, while creating a dramatic focal point for the vibrant neighborhood between Audi Field and Nationals Park, yielding cultural and economic benefits to the area. It should also be observed that this on-axis location is much closer to the US Capitol than the presently proposed Memorial Bridge Circle (*1 ¼ mile versus 2 ¾ miles*).

Finally, this project should be subject to Congressional approval under the “COMMEMORATIVE WORKS ACT” of 1986, which requires that the proposal “*not interfere with, or encroach on, an existing commemorative work,*” and “*to the maximum extent practicable, [that] it protects open space, existing public use, and cultural and natural resources.*” 40 U.S.C. 8905(b)(2).

Thank you.

David Parker, FAIA

Thank you for listening.

My name is Susan Grodsky.

I am a native Washingtonian.

—I was born at Columbia hospital.

—I attended Watergate concerts as a child, sitting in the back steps of the Lincoln memorial.

—I visit Arlington national cemetery on occasional, visiting friends who are interred there.

ALL of points I was going to make have already been made. So I will tell you this story.

When I was in fourth grade, we began our days the same way. We stood, faced the flag and recited the pledge of allegiance.

Then we did what our teacher called democracy in action. We voted on what game we were going to play at recess.

Well, one morning the Freeze Tag contingent was very well organized and they won the vote. I was part of the Red Rover contingent and I wasn't happy. I started to object. Then all of the freeze tag adherents started shouting at me "majority rules, majority rules, shut up Susan majority rules."

Well, I don't know where you all stand on Red Rover versus Freeze Tag. But I hope you agree with me on the takeaway point: in a democracy , majority rules.

The comments have been overwhelmingly in opposition to this arch.

As you make your decision, remember what you must have learned in fourth grade: in a democracy, majority rules."

--Susan J Grodsky



July 9, 2026

New Monumental Arch
NCPC File Number: 8778
Agency: US Department of the Interior
Re: Prepared Testimony for the National Capital Planning Commission Meeting

Honoring the legacy of the servicemembers who gave their lives in defense of this country requires protecting the hallowed ground where they rest from desecration by President Trump and his vanity projects.

Every day I choose to honor the triumph and legacies of servicemembers like Medgar Evers, LtCol Hector Santa Ana, and Major Meghan McClung whose will to serve represents the soul of what this nation could be. I am speaking to you on behalf of the millions of members of the Sierra Club as the director of their Military Outdoors Campaign. For (20) years we've supported and uplifted the veteran community by creating opportunities to heal in nature and uplifting veteran voices in conservation.

Today, I come to you as a Marine Corps veteran, son of a sailor, brother of an airman, and cousin, nephew, and friend of countless members of my extended family who have served in every branch of America's military. I have earned the right, and have the obligation to speak for the people currently interred in Arlington – people who gave their lives to defend an imperfect nation with the expectation that people like you will protect their legacies, our land, and the integrity of our republic today by rejecting this monument.

I was in my mid-twenties, and just months away from my first deployment when I first gave serious thought to where I would want to be buried if I died at war. Every material possession that I owned could fit in my Jeep Wrangler, materials didn't stress me out. Contemplating death itself didn't stress me out. Nothing made me stop and think more than the question of whether I would earn the right to be buried in America's most hallowed ground, Arlington National Cemetery, by displaying valor in combat.

In 2014, I drove alone to Arlington from Marine Corps Base Quantico to better understand what it meant to make the ultimate sacrifice. I departed from Manion Hall, a barracks named after [First Lieutenant Travis Manion](#), a young man who was killed in battle in 2007. I knew his [grave](#) would be located in section 60, where the people close to my age, in a conflict that I would join, were laid to rest – over 7,000 of them there. I certainly didn't want to die, but I trusted that my country would treat my final resting place with the solemn honor and respect that the servicemembers buried in Arlington have earned. I thought about these things in the spring of 2015 where I would support the establishment of "Camp Manion" where Marines led the effort to defeat ISIS in western Iraq.

Since then, I've seen families hosting picnics at the gravesites of their loved ones. I've seen soldiers wipe away their tears. I've felt the heaviness of the moment watching the guards post at the tomb of the unknown soldier. I know that ensuring that none of these lives were expended



in vain requires defending democratic practices at home today and increasing support to the veterans among us.

I am testifying today on behalf the the Sierra Club program to protect our public lands from further desecration, ensure adherence to the law regardless of pressures from the executive, and most importantly refuse to allow any monument to a monarch who hasn't served to cast a shadow on those who gave their lives for this country.

When I drove to Arlington before during my time at The Basic School, I believed that if the worst happened, my country would protect that sacred landscape with the dignity it deserved. This is an important time to remember the steps this administration has already taken to diminish the legacies of heroes at Arlington. This is a time to honor the 400,000 buried on those grounds by protecting their legacies. This is a time to demand those who honor commitments to living veterans by committing resources to individual wellness and correcting systemic environmental injustices in the communities where they live.

Sherman Neal II, Esq.
Veteran, United States Marine Corps
Deputy Director, Military Outdoors
Sierra Club

Members of the Commission, thank you.

I oppose this arch—not because of its scale or its cost, though those objections are already in the record. I oppose it because, whatever it is called, it adopts the architectural language of the triumphal arch—a language of empire that is foreign to the American founding.

The NCPC calls it a "monumental arch," not a triumphal one. But a new label doesn't change the symbolism and this architectural tradition begins in Rome.

In Rome, a triumph was an honor granted by the Senate. When Augustus effectively reserved the triumph for the imperial family, one of the Republic's defining civic honors became an imperial prerogative, symbolizing Rome's transformation from republic to empire. The great surviving Roman arches were built for emperors, and the triumphal arch became one of history's clearest symbols of imperial power.

The early American republic chose a different path. When triumphal arches appeared in the founding era — like the one erected to welcome Washington — they were intentionally temporary, built for the moment and taken down. The defining image of our founding is not a conqueror passing beneath an arch; it is Washington resigning his commission and returning power to civilian authority. In nearly two and a half centuries, the federal government has never built a permanent triumphal arch in the monumental core. That is not an oversight. It is a consistent republican tradition.

Proponents cite the observation that Washington is the only major Western capital without a monumental arch. But that argument makes the case against the arch. Every capital in that comparison — Paris, London, Rome — is or was the seat of an empire or a monarchy. The absence of such an arch in Washington is not a deficiency to be corrected, but distinction to be preserved.

Consider the company this arch would keep: Napoleon's Paris. Mussolini's Rome. Pyongyang, where the Arch of Triumph glorifies Kim Il-sung. At 250 feet, this proposal would stand taller than Pyongyang's.

The site makes that symbolism even more troubling. In a Roman triumph, the procession displayed captives and spoils. Placing a victory arch at the threshold of Arlington turns more than 400,000 Americans buried there into the backdrop for someone else's triumph. The long, open approach from the Lincoln Memorial was designed as an act of humility. It needs no gate. In a republic, the honored dead answer to no one who passes above them.

Today I speak as a retired federal law enforcement officer, as a military spouse, and granddaughter of a soldier killed at Okinawa. In every case, the oath was the same — not

to a ruler, but to the Constitution. That is the American distinction: we sacrifice in service to a republic, not an empire. Our capital was designed to reflect that distinction. A triumphal arch has no place in it.

I urge you to reject it.

Thank you.

National Capital Planning Commission
Public Hearing on July 9, 2026
File No. 8778 (New Monumental Arch)

Testimony of Thomas J. Moore

I have been a resident of the National Capital Area continuously since 1976. I was a resident and taxpayer in the District of Columbia from 1976 to 1981. From 1981 to date, I have been a resident and taxpayer in Virginia.

I have for five decades regularly traveled over the Memorial Bridge between Virginia and the District, and am familiar with the area around the Memorial Bridge. The proposed New Monumental Arch is completely out of character for the area. The only structures over five stories visible from Memorial Bridge are the high rises in the areas of Virginia known as Rosslyn, Crystal City, and Pentagon City. I understand that the New Monumental Arch is proposed to have a height of 250 feet, or about 25 stories. This is out of character for the low rise architecture of Washington, DC, and would block the current panoramic views available from Memorial Bridge, the west side of the Lincoln Memorial, and most of Arlington National Cemetery.

I encourage you to reject the New Monumental Arch as currently planned.

Thank you for having a public hearing on this matter.