



May 15, 2026

Mr. William Scharf
Chair, National Capital Planning Commission
401 9th Street NW, Suite 500
Washington, DC 20004

RE: Comments on the Proposed United States Triumphal Arch, Memorial Circle, George Washington Memorial Parkway, Columbia Island

Dear Chairman Scharf,

The National Parks Conservation Association (NPCA) respectfully submits the following comments on the proposal by the U.S. Department of the Interior to construct a United States Triumphal Arch at Memorial Circle on George Washington Memorial Parkway. NPCA is a nonpartisan organization dedicated to protecting and enhancing America's national parks. With 1.9 million members and supporters, we have advocated for the stewardship of George Washington Memorial Parkway, Arlington National Cemetery, the National Mall, and national park units throughout the National Capital Region for decades.

As a co-approving authority under the Commemorative Works Act (CWA) and a co-regulator under the National Historic Preservation Act and NEPA, NPCA must assess whether this project has followed the planning framework Congress established for the monumental core, and whether it protects the open space and existing commemorative works that belong to all Americans. We urge NPCA to exercise that authority fully and act without schedule pressure or executive urgency.

Our comments address four areas: (1) the project's failure to comply with the Commemorative Works Act's mandatory process, including the specific requirements governing Area I placement; (2) the dramatic and irreversible impacts the proposed structure would impose on the historic viewshed of the National Mall; (3) the proposal's impact to Arlington National Cemetery and its historic and symbolic relationship with the Lincoln Memorial; and (4) the absence of completed NEPA and Section 106 review.

I. The Project Has Not Complied with the Commemorative Works Act

The Commemorative Works Act was enacted in 1986 specifically to replace the ad hoc, executive-driven monument placement that had long created conflict in Washington's civic landscape. Congress designed the CWA to ensure that new commemorative works on federal land in the District are the product of deliberation, democratic accountability, and genuine multi-agency review, not unilateral executive action on a political timeline. The process the CWA establishes is not optional or advisory. It is the law.

The proposed Triumphal Arch, as a permanent monument of national symbolic character to be sited on NPS-administered land in the Commonwealth of Virginia, is a "commemorative work" within the meaning of the CWA. 40 U.S.C. §8902. The administration has argued that 1920s-era legislation authorizing "construction of two tall columns surmounted by statues on Columbia Island" in connection with the design of Arlington Memorial Bridge provides legal authority for the project, preventing the need for the modern CWA process. NPCA urges NPCA to reject this claim. A century-old authorization for decorative bridge columns that were never built and enacted more than six decades before the CWA existed cannot substitute for the comprehensive requirements Congress put in place in 1986 and has refined since. The CWA was enacted precisely because prior, scattered statutory authorizations had proven an inadequate



framework for managing commemorative works in the monumental core. Congress did not intend for agencies to sidestep the modern framework by reviving pre-CWA authorities.

As the CWA applies, the proposed location at Memorial Circle, Columbia Island implicates the statute's Area I requirements. Area I, under 40 U.S.C. §8908, encompasses the most significant portions of the commemorative landscape including the National Mall. Placement of a commemorative work in Area I is not simply a matter of site selection. It triggers a specific and mandatory two-step process: first, the Secretary of the Interior or the Administrator of GSA, in consultation with the National Capital Memorial Advisory Commission (NCMAC), must determine that the proposed work is of "preeminent historical and lasting significance to the United States." 40 U.S.C. §8908(b). Second, that determination must be transmitted to Congress, which must then affirmatively approve placement in Area I by legislation within 150 days, or the authorization lapses to Area II.

To NPCA's knowledge, neither step has been completed. There is no public record of a Secretary's preeminent significance determination for this project, no documented NCMAC consultation, and no congressional action approving Area I placement within the meaning of 40 U.S.C. §8908. The administration's reliance on the 1920s bridge authorization does not satisfy these requirements and NPCA should require the administration to provide a clear and legally supported demonstration that the Area I process has been completed before the Commission takes any approving action.

II. The Proposed Arch Would Cause Dramatic and Irreversible Harm to the Historic Viewshed of the National Mall

The western axis of the National Mall is one of the most significant civic landscapes in the world. The view from the Lincoln Memorial across the Reflecting Pool to the Washington Monument, and the reciprocal view westward from the Capitol across the Mall and out to the horizon beyond the Lincoln Memorial, represent more than 120 years of deliberate planning, refinement, and legal protection. The McMillan Plan of 1902 established the organizing principles of this landscape: long, uninterrupted viewsheds, a clear hierarchy of monumental elements, open space as a civic value in its own right, and a compositional logic in which each element reinforces the others.

The proposed Triumphal Arch would shatter that composition. At 250 feet in height, including a gilded statue, paired eagles, and a public observation deck at its apex, the structure would stand more than twice as tall as the Lincoln Memorial, which rises 99 feet. It would exceed the Arc de Triomphe in Paris by nearly 90 feet. Nothing of comparable scale has been introduced into the western Mall corridor in the history of the monumental core. The Washington Monument, at 555 feet, was designed as the singular vertical punctuation of the entire Mall composition, visible from all directions precisely because nothing else competes with it. A 250-foot arch at Memorial Circle would introduce a second competing visual element of enormous mass at the western end of the Mall, permanently altering the way visitors experience the Lincoln Memorial from the east, the Washington Monument from the west, and the entire landscape in between.

The impact on existing viewsheds would be severe and irreversible. The view from the Lincoln Memorial across Arlington Memorial Bridge to Arlington House, one of the most symbolic vistas in the United States, would be dominated by the arch. The view from the National Mall looking westward toward the Lincoln Memorial, experienced by tens of millions of visitors each year, would be transformed: where visitors now see the Lincoln Memorial rising against an open sky, they would instead see a 250-foot arch looming beyond it. Viewed from the Virginia side of the Potomac, the arch would visually overwhelm the Lincoln Memorial and fundamentally alter the character of the entire monumental skyline.



The Commemorative Works Act requires, as a condition of NCPC site approval, that a commemorative work not “interfere with, or encroach on, an existing commemorative work” and that it protect “open space, existing public use, and cultural and natural resources.” 40 U.S.C. §8905(b). The Secretary of the Interior’s Standards for the Treatment of Historic Properties, which govern Section 106 review, define adverse effects to include the “introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” 36 C.F.R. §800.5(a)(2). A 250-foot arch at Memorial Circle would fail both tests.

III. The Proposed Arch Would Irreparably Harm Arlington National Cemetery and Its Historic Relationship with the Lincoln Memorial

Arlington National Cemetery and the Lincoln Memorial are not merely adjacent landmarks. They are the two anchoring elements of one of the most deliberate and historically resonant acts of civic design in American history. When Congress authorized Arlington Memorial Bridge in 1925, it did so with an explicit symbolic purpose: to physically and visually unite the Lincoln Memorial, representing the Union, with Arlington House and the cemetery that surrounds it, the former home of Robert E. Lee and the ground where the nation’s war dead are interred. The bridge was designed low with a classical restraint that would not interrupt the sightlines between the Memorial and the cemetery. The landscape of Memorial Circle, Columbia Island, and the approach to Arlington was designed to frame and honor that connection.

The proposed Triumphal Arch would physically and symbolically shatter that relationship. Placed at Memorial Circle, the very point where the Memorial Bridge arrives on the Virginia side, where visitors transition from the Lincoln Memorial to the cemetery grounds, the arch would interpose a 250-foot monumental structure between the two sites the bridge was designed to connect. Visitors approaching Arlington from Washington would no longer experience the measured, solemn procession across the bridge that the landscape’s designers intended. They would instead pass through and beneath a massive triumphal arch topped with gilded figural elements, a statement fundamentally at odds with the cemetery’s character and purpose.

Arlington National Cemetery is the hallowed resting place of more than 400,000 veterans and their families. Thirty funeral services are conducted there each day. The cemetery’s power as a place of national mourning and remembrance derives from its deliberate restraint, making a triumphal arch with an observation deck and gilded statuary antithetical to its character in every respect.

We also note that a group of veterans has filed legal action challenging the proposed arch, arguing that it would dishonor their service and harm the experience of families visiting Arlington. Their concerns deserve serious weight in the Commission’s deliberations. The veterans who are buried at Arlington, and the families who visit them, have a profound stake in how the entrance to that cemetery is treated.

IV. NEPA Review and Section 106 Consultation Have Not Been Completed

No NEPA document and no documentation of Section 106 consultation under the National Historic Preservation Act appear in the public record for this project. Both must be completed before NCPC can take approving action.

The proposed arch implicates many historic properties and significant landscape resources that trigger Section 106 review, including: the George Washington Memorial Parkway (an NPS unit and National Historic Landmark); Arlington Memorial Bridge and its contributing designed landscape; the Lincoln Memorial and its setting; Arlington National Cemetery; the Lady Bird Johnson Park historic landscape on Columbia Island; and the National Mall.



NEPA likewise requires rigorous review before any federal commitment is made. There is no plausible categorical exclusion applicable to construction of a 250-foot monumental structure on National Park Service land in the monumental core. An Environmental Impact Statement (EIS) is the appropriate level of analysis given the scale of the action, and it must include visual simulations from key vantage points, as well as analysis of impacts to the historic designed landscapes of Arlington Memorial Bridge, the George Washington Memorial Parkway, and Arlington National Cemetery.

Conclusion

NPCA strongly supports commemorating our nation's 250th anniversary. We support investments that honor our history and strengthen our national parks. But the proposed Triumphal Arch, as designed and on its current timeline, has not followed the appropriate process, has not completed required environmental and historic preservation review, and would cause dramatic and irreversible harm to some of the most significant historic landscapes in the United States.

We urge NCPC to:

- Decline to take approving action until the administration demonstrates full compliance with the Commemorative Works Act;
- Require completion of NEPA review at the Environmental Impact Statement level, with NCPC as a cooperating agency, including comprehensive viewshed analysis from the Lincoln Memorial, the National Mall, the Capitol grounds, and the Virginia approach to Memorial Bridge;
- Require completion of Section 106 consultation, including identification of the area of potential effects encompassing all National Historic Landmark and National Register properties in the viewshed;

The National Mall, George Washington Memorial Parkway, and Arlington National Cemetery are among the most visited and most revered public landscapes in the United States. They are the products of generations of deliberate planning, legal process, and public stewardship. They deserve protection, not transformation. NCPC has both the authority and the responsibility to ensure that new commemorative works honor that legacy. We urge the Commission to exercise that authority fully.

Thank you for your consideration.

Respectfully,

Edward Stierli
Mid-Atlantic Senior Regional Director
National Parks Conservation Association

June 1, 2026

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

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

Dear Chair Scharf and NCPC Commissioners:

[The Society of Architectural Historians \(SAH\)](#) 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 import.

The proposal before you to build a new 250-foot Monumental Arch in Memorial Circle on Columbia Island in Washington DC, is located in one of the country's most significant historical and urban ensembles. As such it requires the highest level of architectural, landscape and urban design, adherence to laws regulating the placement of new monuments, compliance with guidelines prepared by the federal government regarding this site, and rigorous scrutiny and review by agencies like the NCPC that were set up expressly for the purpose of providing oversight.

After reviewing the submission made by the United States Department of the Interior, we feel that the proposal as presented, threatens to negatively impact the historic and architectural context of its setting, disrupts views to existing significant historic monuments, and runs counter to decades of design and preservation guidance for this area that has been prepared by none other than the applicant itself, the U.S. Department of the Interior. In support of our assessment, we offer the following comments:

Architectural History of Memorial Avenue Corridor Reveals Rejection of Tall, Overpowering Architectural Features and Advocates Preservation of Views between Lincoln Memorial and Arlington House.

At the U.S. Commission of Fine Arts (CFA) Meeting on May 21, 2026, the Department of Interior presented images of historic, unbuilt proposals for various bridges and monument designs (1877–1934) between Washington DC and Arlington, in support of the New Monumental Arch.¹ This previously unsubmitted set of images led the CFA Commissioners to note “the history of heroic architecture proposed for this site in the late nineteenth and early twentieth centuries, including several arches and a pair of 166-foot-tall columns.”² They further commented that “this proposal builds on the legacy of the McMillan Plan for Washington, D.C.,” as they proceeded to approve the concept proposal as a final design.³

We counter this claim that the architectural history of this site supports the construction of tall architectural elements and triumphal arches that block sightlines, or that the proposed New Monumental Arch respects the legacy of the 1901 McMillan Plan. The architectural history of this area **reveals the exact opposite**—it shows that as the completion and implementation of the McMillan Plan proceeded in the first half of the twentieth century, prominent architects, the CFA, and the U.S. Senate, continually rejected these former nineteenth-century proposals. Instead, they advocated for the bridge and any potential monuments to be low-profile and not disrupt the axial sightlines between Arlington House and

Lincoln Memorial. This is shown by our commentary below on the images shared at the CFA meeting, and supported by numerous archival records, scholarly literature and planning documents.

The images of unbuilt bridge designs showing tall monumental arches either in the bridge span or at one end of it (1887-Smithmeyer and Pelz; 1900-George Keller; 1900-Buck; 1900-Burr and Casey, 1900-Walker and Morris, 1900-Colonel Bingham), all predate the 1901 McMillan Plan and the subsequent siting and construction of the Lincoln Memorial (1913–22).⁴ In fact, many of the early designs mentioned above were not even in the same location as the present Arlington Memorial Bridge.⁵ Once the McMillan Plan had identified a major monument to be located on the site of the current Lincoln Memorial, and the axis between Arlington House and Lincoln Memorial was established, Arlington Memorial Bridge was designed specifically in 1923 to be a “low-profile” structure. As the 2024 Cultural Landscape Report for the Memorial Avenue Corridor notes, “The original design situated the bascule span mechanical equipment and structural elements below the bridge deck so as not to interfere with the horizontality of the bridge. The integrated design maintained the bridge’s low profile, preserving the views between the Lincoln Memorial to the east and Arlington National Cemetery and the Arlington House plantation to the west.”⁶

Where the current Memorial Circle now sits, the McMillan Plan and its subsequent development (1923-McKim, Mead and White; 1923 and 1930-Arlington Memorial Bridge Commission) showed a slightly enlarged elliptical plaza with two 166-foot tall slender columns, situated not in the center, but on either side, at a certain distance away from the bridge.⁷ As noted in an article in the Washington Post in 1928, these “stately columns [would be] framing in with, but not interfering with the view of the Lincoln Memorial from the direction of Lee Mansion.”⁸ One of these columns was to symbolize the North and the other the South, further reinforcing the symbolic visual connection between the Lincoln Memorial and Arlington House. These columns and their diminutive size and proportion compared to the currently proposed Monumental Arch can easily be seen in the images submitted to the CFA by the Department of the Interior.⁹ This design for columns, like many others, was ultimately shelved, and what was built instead in 1940 was Memorial Circle, which in the 1930s was proposed to incorporate a small water basin with fountains (also not built).¹⁰

This architectural history of the area reveals clearly that “heroic” triumphal arches were ultimately rejected and low-profile structures were approved instead. The two proposed 166-foot-tall columns from the 1920s are completely dissimilar in intent, design, size, height, proportion and location to the 2026 proposed Monumental Arch.

Recent and Past Planning and Preservation Guidance by Various Federal Agencies, including NCPD and Dept. of the Interior, Reject the Installation of a Tall Permanent Monument in Memorial Circle.

Since the 1940s no design proposal has sought to block the visual connection between Lincoln Memorial and Arlington House. All federal planning and design studies have only reinforced the importance of maintaining low profiles and avoiding any tall or permanent structures in this area. NCPD’s own Memorials and Museums Master Plan (2001), noted that the “existing circle at the west end of Memorial Bridge is not seen as an appropriate location of a future memorial.”¹¹ The most recent 2024 Cultural Landscape Report for Memorial Avenue Corridor, commissioned by the Department of the Interior, and meant to serve as a guide for future stewardship and planning, notes that “[future] Treatments should preserve the corridor’s axis, and the viewshed connections and significant vistas that were foundational to its design and ongoing function.”¹² It goes on to note that “Within the [Memorial] circle, protection of views is key.”¹³ It suggests that the circle could “be considered as a future site of temporary commemorative works” which should be “appropriately scaled and placed around the verges of the circle (and perhaps within the circle itself on rare occasions).”¹⁴ The Report was so concerned about views, low profiles and horizontality that it limited an alternative option of adding plantings to Memorial Circle only to a height of 1-2 feet (compare that to 250 feet!) and ultimately rejected it in favor of maintaining the historic grass turf.¹⁵

In closing, there is no historic precedence or federal guidance that supports the construction of a massive 250-foot permanent masonry Monumental Arch in the center of Memorial Circle. Your own NCPD Executive Director’s review of this concept design notes that “the sight line, design, and landscape features of Memorial Avenue, which includes Memorial Circle, are contributing elements of the National Register-listed Arlington National Cemetery Historic District and Arlington Memorial Bridge.”¹⁶ It further notes that “the panoramic views from Arlington House at Arlington National

Cemetery to the west, and the Lincoln Memorial to the east, have been in place since the 1920s and reflect the visual connectivity characteristic of the McMillan Plan.” The review concurs that “according to the submission materials, the view of the Lincoln Memorial from Arlington House will be blocked by the proposed arch, and views from the Lincoln Memorial to the Arlington House will be altered.” It encourages the applicant “to provide, as part of the Section 106 process of the National Historic Preservation Act, any design options that were explored to avoid or minimize impacts on the visual connection between Arlington House and the Lincoln Memorial.” It requests that “the applicant provide, as part of the next submission, updates on the Section 106 process and the National Environmental Policy Act (NEPA) evaluation process, as completion of both processes are required for NCPD final action.” Along with these, the NCPD Executive Directors Recommendation includes various concerns about the design—from pedestrian, and vehicular safety, ADA access, compliance with FAA regulations and Height of Buildings Act, to insufficient information about site and building materials, lighting and other elements.

Despite the fact that the applicant did not make substantive changes to the proposed arch as requested by the CFA in their April concept review (like removing statues atop the arch thus reducing height, introducing open archways to facilitate views, etc.), CFA voted in May to fast-track the project by granting their final approval.¹⁷ We urge the NCPD not to replicate approving plans that fall short of regulatory and public mandates. Instead, we implore you to take seriously the comments included here and in the NCPD Executive Director’s Recommendation, and insist that the applicant provides the requested information, addresses concerns, and complies with applicable laws and regulations, before advancing this design to preliminary and final approval.

Thank you for the opportunity to provide comments and we sincerely hope that you will consider them in making decisions for one of the most significant historic and cultural sites in our country.

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., Pushpita Eshika, Ph.D., Yannick Etoundi, Bryan Clark Green, Ph.D., Başak Kalfa, Ph.D., Mary Rzepczynski Swati Chattopadhyay, Ph.D. (ex-officio member), Ben Thomas, Ph.D. (ex-officio member)

¹ U.S. Department of the Interior, *Precedent Studies for Columbia Island (1887–1934)*, May 21, 2026, <https://www.cfa.gov/records-research/project-search/cfa-21-may-26-1> (accessed May 23, 2026)

² Thomas E. Luebke, FAIA, Secretary of the U.S. Commission of Fine Arts to Doug Burgum, Secretary of the Interior, U.S. Department of the Interior, “Letter on new Monumental Arch,” U.S. Commission of Fine Arts, May 28, 2026. <https://www.cfa.gov/records-research/project-search/cfa-21-may-26-1> (accessed May 29, 2026)

³ Luebke, “Letter on new Monumental Arch,” May 28, 2026.

⁴ U.S. Department of the Interior: National Park Service, *Cultural Landscape Report: Memorial Avenue Corridor, George Washington Parkway*, Frisbie M, Lester M, Mao C, Penberthy R, Shang H, Wang Z, Drake R, May 2024, Washington, DC, 75–81. <https://irma.nps.gov/DataStore/Reference/Profile/2313163>. See also, Pamela Scott, “The City Designed as a Work of Art: The Emergence of the Senate Park Commission’s Monumental Core,” in *Designing the Nation’s Capital: the 1901 Plan for Washington, D.C.*, eds. Sue Kohler and Pamela Scott (Washington D.C.: U.S. Commission of Fine Arts, 2006), 112–121.

⁵ The pre-1901 bridge and memorial designs assumed a potential location for the bridge between Arlington and Washington D.C. on a proposed extension of New York Avenue and 23rd St NW. In 1913, an appropriation was made for the Burr-Casey 1900 bridge proposal but was ultimately rejected by the CFA in 1922. See Scott, *Designing the Nation’s Capital*, 118 and, Kurt G.F. Helfrich, “Beloved Ancien: William T. Patridge’s Recollections of the Senate Park Commission and the Subsequent Mall Development,” in *Designing the Nation’s Capital*, 312. See also U.S. Department of the Interior, *Cultural Landscape Report*, 76.

⁶ U.S. Department of the Interior, *Cultural Landscape Report*, 27.

⁷ U.S. Department of the Interior, *Precedent Studies for Columbia Island (1887–1934)*. See also, U.S. Department of the Interior, *Cultural Landscape Report*, 86–91.

⁸ “Big Plaza for End of Arlington Span Planned by Board,” *The Washington Post*, May 25, 1928.

⁹ U.S. Department of the Interior, *Precedent Studies for Columbia Island (1887–1934)*.

¹⁰ U.S. Department of the Interior, *Cultural Landscape Report*, 94–95.

¹¹ National Capital Planning Commission, *Memorials and Museums Master Plan*, Washington DC: National Capital Planning Commission, 2001, 35, https://www.ncpc.gov/docs/Memorials_and_Museums_Master_Plan_full_2001.pdf (accessed March 15, 2026).

¹² U.S. Department of the Interior, *Cultural Landscape Report*, 351.

¹³ U.S. Department of the Interior, *Cultural Landscape Report*, 366.

¹⁴ U.S. Department of the Interior, *Cultural Landscape Report*, 366.

¹⁵ U.S. Department of the Interior, *Cultural Landscape Report*, 385.

¹⁶ National Capital Planning Commission, *Executive Director’s Recommendation: New Monumental Arch*, NCPC File Number 8778, Washington DC: National Capital Planning Commission, May 29, 2026, <https://www.ncpc.gov/files/download.php?id=7780> (accessed May 30, 2026).

¹⁷ Thomas E. Luebke, FAIA, Secretary of the U.S. Commission of Fine Arts to Doug Burgum, Secretary of the Interior, U.S. Department of the Interior, “Letter on new Monumental Arch,” U.S. Commission of Fine Arts, April 23, 2026, <https://www.cfa.gov/records-research/project-search/cfa-16-apr-26-1> (accessed April 26, 2026). See also Luebke, “Letter on new Monumental Arch,” May 28, 2026, <https://www.cfa.gov/records-research/project-search/cfa-21-may-26-1> (accessed May 29, 2026).

My name is Bill Vaughan, speaking for myself only. Thank you for the opportunity.

I hope that you will recommend drastically reducing or even canceling this Arch project.

My father and grandfather are buried side by side at the American cemetery above Omaha Beach.

3 times I've been able to visit them...a deeply spiritual, religious, tearful experience.

So I have strong feelings about what a military cemetery should be.

It should be about the men and women beneath the tombstones, row on row on row on row.

The proposed massive 250 foot pile with its gold gilding will, in my opinion, detract from the honored dead that Arlington is supposed to be all about.

Think Lincoln who basically said 'in a larger sense, we can not dedicate, we can not consecrate, we can not hallow, this ground. The brave men, buried here, have consecrated it, far above our poor power to add or detract.'

This Arch does detract: no matter what we say, people will think of Triumphal Arches, built by megalomaniac Caesars and Napoleons, glorifying wars.

Americans don't glorify wars—or at least we shouldn't.

In my opinion. every war is a failure, a failure of preparedness,

Let's not build an Arch to failure or to the glory of war.

My mother and grandmother were living together at Fort Riley when the death telegrams were delivered to them at the same moment.

They felt no glory that day.

And my mother felt no glory weeks later when my father's personal effects were delivered. This is his West Point ring. Can you see the gouge marks where the stone was pried out and stolen by someone in his regiment's graves unit? There was no glory that day.

War and glory? Please, we should inscribe on any war monument or this Arch, Wilfred Owens' "Dulce et Decorum Est" or John Sargent's painting "Gassed"---art not of glory but horror.

We should all concentrate on those buried on the Arlington hillside. The Arch is a disrespectful distraction.

Spend the money on making the VA better to serve those who have served.

Thank you.

Comments by Susan Douglas at NCPC public comment session on June 4, 2026 in re. the Arch

Good afternoon Chairman Scharf and Commissioners,

I am horrified by how quickly the Triumphal Arch project is moving through the approval process in spite of strong public opposition and compelling reasons for halting this plan.

The Commission on Fine Arts recently granted final approval for the Arch design in spite of receiving 1,600 written comments, of which only 3 were in favor, and concerns voiced by some in person.

My concerns about the Arch are as follows:

There is a law that bars all construction on federal parkland in the nation's capital without the express authority of Congress. The administration said it won't seek Congressional approval and will instead rely on an authorization from 1925 related to a project never built. Using a 100-year-old loophole to avoid seeking Congressional approval is specious.

The Arch is a vanity project for Trump. Ostensibly meant to honor America's 250th birthday, Trump admitted at a dinner last year that the Arch was being built for him. Video of those comments is widely available online. Presidents should not build their own memorials. Memorials are a reflection of the public's judgment of a leader's legacy, and are built after that legacy has been established.

Building the Arch on Memorial Circle is a desecration of the sacred space where 400,000 soldiers and family are buried. The grotesque size of the Arch would block the historic sightline between the Robert E Lee Memorial at Arlington National Cemetery and the Lincoln Memorial, a view intended to symbolize North/South reunification after the Civil War.

At 250 feet tall, the Arch will dwarf everything in its midst and ruin the vista for the nearly 70,000 drivers who cross DC's Grand Entrance each day. Construction of this Arch will create a traffic nightmare in an already busy corridor.

The FAA has launched a study of the possible flight safety risks given the Arch's proximity to Washington National Airport and its complex flight patterns. This is standard FAA procedure

for anything over 200 feet tall. The review process could take up to 9 months.

Memorial Circle is already under permit for testing and boring in preparation for construction work because the soil in this location is predominantly dredged alluvial soil and is considered a poor choice for a massive stone monument. Extensive and expensive foundational supports will be required to support the Arch.

Congressman Don Beyer is so concerned about this project that he recently co-sponsored a bill to block the Arch, stating the project is tasteless and disrespects those buried at the Cemetery, including several of his family members. Public Citizen has filed a lawsuit on behalf of several Vietnam Veterans and an architectural historian to block construction of the Arch.

Any discussion of constructing the Arch is premature at best pending the FAA's safety review, until structural viability at the site has been determined, and until there is a verdict in the ongoing lawsuit filed by Public Citizen and Congressman Beyer's bill.

That aside, this Arch must be stopped.

Democracies do not construct memorials to living presidents. Disrupting the historically significant view between the Lincoln Memorial and Arlington National Cemetery is an affront to our history, to the men and women at Arlington National Cemetery who gave their lives in service to our country, and to those who remember them. It is, in fact, arch insanity, and I urge you to shut down this plan.

GARY E. LANGSTON, JR.
Washington, DC 20016

May 28, 2026

National Capitol Planning Commission (via online Portal and Email)

Subject: Comments on the Proposed Arch for the May 21, 2026 Review

I am a Veteran and a resident of Washington, DC. My parents, interred in section 66, were a Vietnam Veteran and his Army Wife/Nurse. I served for 29 years in the US Army, and my wife is a Veteran of the Persian Gulf War. We also have several ancestors who served in the US Armed Forces dating back as far as the War of 1812.

These are my personal comments.

Any memorial at Memorial Circle must respect those interred there, their descendants (current and future generations), and remain consistent with the solemn symbolism provided by the linkage of the Lincoln Memorial, Memorial Bridge and Drive, the Hemicycle and the Women's Military Museum within it, the Eternal Flame and the Kennedy Gravesite, and the former Custis Lee Mansion now known as Arlington House.

In fact a solemn Memorial, rather than a Monument, is called for here, in order to promote a further unification of our country, and respect these very hallowed grounds. The best way to insure that anything built in Memorial Circle is to follow the law, collaborate on the design with affected stakeholders, and present the project to the US Congress for approval. To do otherwise is disrespectful to the living.

That said, the following comments are keyed to the renderings (only recently posted on the NCPC web site) should the American People, through their Elected Representatives, choose to move forward with an Arch at this location.

1. The renderings provided clearly demonstrate that multiple views of the Lincoln Memorial are blocked, destroying the symbolism of the unification of the country, as provided by the original design and current status.
2. Other than the view from Arlington House, above the Kennedy Gravesite, there are no views of the proposed Arch and its viewing stand from within the grounds of Arlington Cemetery. These should be provided and carefully reviewed to understand the impact of the Arch as seen from multiple locations inside the Cemetery, to include the Tomb of the Unknowns, the Kennedy Gravesite, and numerous sections of the Cemetery. What will visitors from within multiple locations of the Cemetery see?
3. There is no lighting design information provided. Need a night view of this, and from other locations along the Potomac River. There are no night-time renderings

GARY E. LANGSTON, JR.
Washington, DC 20016

in the current slide decks. As is well known, many of the most awe-inspiring views of Washington are seen at night. The design of any improvements to Memorial Circle must take into account lighting. The prominence of Arlington House, the Air Force Memorial, and the Flag at Quarters 1 on Ft Myer at night is subtle, respectful, and breathtaking. I also wonder whether the viewing platform is intended to open at night or operate at similar hours as the Cemetery. The first snapshot below was taken on 19 May at approximately 11PM, to illustrate one “as-is” perspective. Anything on Memorial Circle should be carefully designed so as to not overwhelm this solemn view.

4. Daytime and Nighttime renderings from other locations along the banks of the Potomac River should be provided, to inform both the physical and lighting designs. One example is the second photo below, also taken on 19 May.
5. The design of the winged statue at the top of the Arch is the singularly dominant feature of the Arch, since it alone can be seen from the West Front of the Capitol, the Mall, and many other locations. I am confused as to what it signifies to a viewer from those locations, but any sculptures should reinforce the solemnity of the nearby hallowed grounds. Memorial Circle is as much an entrance to Arlington Cemetery as it is an entry to the City of Washington.
6. Slide 3 (among others). The choice of “One Nation Under God” should be reconsidered. I recognize it is a traditional sentiment from our Nation’s History, but it, in 2026, does conflict with the beliefs of a significant minority of the people interred at Arlington. Additionally, this quote most commonly heard today within Pledge of Allegiance as it was revised during the Cold War. While I do not have a specific substitute in mind, I would suggest that the Committee and the Designers search for another phrase directly attributable to the Declaration of Independence, Memorialize our Founding Fathers, and do so with the support of the American People through their elected members of Congress.

Respectfully,

/s/

Gary E. Langston, Jr.
Washington, DC 20016

Attached Below: Night-time Photos taken on May 19, 2026

GARY E. LANGSTON, JR.
Washington, DC 20016



Figure 1 (Above): Night View Similar to Slide 18 taken on May 19, 2026

GARY E. LANGSTON, JR.
Washington, DC 20016

Figure 2 (Below): Night View Taken from East of Memorial Bridge, May 19, 2026





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

**Public Testimony of Carol Quillen
President and CEO of the National Trust for Historic Preservation
Before the National Capital Planning Commission
Regarding the Proposed Monumental Arch at Memorial Circle**

Thursday, June 4, 2026

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

My name is Carol Quillen, and I serve as President and CEO of the National Trust for Historic Preservation. Thank you for this opportunity to be with you today to share comments about the proposed arch project on behalf of the National Trust.

This Commission works on behalf of the American people. You play a critical role—questioning, reviewing, and helping to refine proposed projects that define our nation’s capital city and ideally embody both our founding ideals and our ongoing commitment to build a more perfect union. The value you bring was on full display during this Commission’s review of the National World War I Memorial. Over a series of meetings, this Commission helped refine the original submission, modifying it to respect the iconic water basin that defined the site and improving pedestrian access. The result was a substantively improved design that highlighted the best of the site’s existing features, while also creating a more fitting memorial to our nation’s heroic service members.

Since our nation’s founding, we Americans have understood the symbolic power of Washington, D.C. Our capital is a planned city. In their design, context, and relationship to each other, our most meaningful buildings and monuments communicate our system of government and the principles on which it is based. Achieving this in a democratic republic has required meticulous planning and deep respect for what has gone before. Each generation has left its mark, and they have done so in carefully calibrated, measured steps that honor our history and our aspirations. It’s our responsibility to remember this two-century long tradition of design discipline, and to strive to be worthy of and then pass on this inheritance.

From this perspective, the proposed Arch project poses significant risks. It flouts centuries of planning. It would diminish some of the nation’s most sacred landmarks. And its hasty design, lack of consultation, and rush to construction undermine the ideal of government by and for the people. We therefore respectfully offer specific comments on the proposed location, height, scale, and design of the arch project.



**National Trust for
Historic Preservation**

Save the past. Enrich the future.

First, the proposed location. The center of Memorial Circle is not an appropriate place to construct a monument equivalent in height to a 20-story building. The colossal bulk of the proposed arch would block the hallowed vista from the Lincoln Memorial, across Arlington Memorial Bridge, to Arlington National Cemetery and Arlington House. One of the American people's most sacred landscapes, this visual link communicates the magnitude of the Civil War, the obligation its unimaginable cost imposes on all Americans, and the aspiration of a post-Civil War reconciliation in a new birth of freedom.

Although there have been earlier proposals to place structures at this location, including the idea for two memorial columns, these proposed columns would have *framed* the views of Arlington House and the Lincoln Memorial, not interrupted them. And, after reflection, none of these earlier proposals were built.

Second, with its height and scale, the proposed arch would overwhelm neighboring landmarks. It is double the size of the Lincoln Memorial. It is also, as NCPC staff note, inconsistent with the Height of Buildings Act that protects and honors the plan of the city.

Third, constructing a mammoth arch at the entrance to Arlington National Cemetery would brazenly disrespect the cemetery's solemn character. As the hallowed resting place of 400,000 veterans and their families, Arlington Cemetery is a powerful reminder of American military sacrifice, selfless service, and national unity. The arch would communicate a jarring indifference to the sacrifice of our veterans and mar the outward view for military families and visitors.

Finally, as indicated in your staff report, the applicant has not yet initiated review of this project under Section 106 of the National Historic Preservation Act. The law clearly mandates that this review process be completed "*prior to*" approval. Submitting these plans for collaborative review and expert commentary as the National Historic Preservation Act requires would signal respect for the rule of law, improve the project, and help protect the President's legacy.

Our concerns are serious. We respectfully urge you to withhold your approval for this project until the legally required Section 106 process has been completed and so that it has the benefit of the careful scrutiny that our capital city and the American people deserve. The National Trust for Historic Preservation remains eager and ready to support you through that process with our decades of experience collaborating with NCPC on these matters.

Thank you again for the opportunity to be here today.

June 3, 2026

Mr. William Scharf
Chair, National Capital Planning Commission
401 9th Street NW, Suite 500
Washington, DC 20004
info@ncpc.gov

Prepared Testimony — National Capital Planning Commission

Re: *NCPC File No. 8770 — Memorial Circle, George Washington Memorial Parkway, Columbia Island — New Monumental Arch*

My name is Bryan Clark Green. I am an architectural historian in Richmond, Virginia. The Commission of Fine Arts has already granted final approval for this proposal. This Commission is reviewing it for the first time. I want to spend my three minutes explaining why that sequence is not a reason to defer to the CFA's judgment — but to exercise your own.

The Commission of Fine Arts voted unanimously on May 21 to approve the proposed arch — despite receiving approximately six hundred public comments of which 99.5 percent were in opposition, and without requiring full schematic designs. An FAA aerial hazard review, required for any structure exceeding two hundred feet, remains unresolved. A federal lawsuit filed by Vietnam War veterans under the Commemorative Works Act of 1986 is actively pending. This Commission is being asked to provide concept approval within that same incomplete legal and regulatory framework. The CFA's vote does not discharge this Commission's independent responsibility.

The site is the problem no design adjustment can solve. Memorial Circle occupies the midpoint of the commemorative axis the McMillan Commission designed to carry the symbolic weight of national reunion — the line from the Lincoln Memorial across Arlington Memorial Bridge to Arlington House above the national cemetery. The circle's openness was not vacancy awaiting a monument. It was the spatial release the axis required. The Women in Military Service for America Memorial inscribes that axis in physical form, achieves presence without imposing scale, and holds the sequence open for the cemetery beyond. A 250-foot arch — more than twice the height of the Lincoln Memorial — would not enter that sequence. It would end it.

Consider what 250 feet means. At that height, this would be the tallest classical triumphal arch in the world — 86 feet taller than the Arc de Triomphe in Paris, 53 feet taller than the Arch of Triumph in Pyongyang. Those dimensions were not arrived at by analyzing the site. They were chosen to produce the largest triumphal arch ever built. And this Commission is being asked to place it at the entrance to Arlington National Cemetery.

The revised design, made at the President's direction, retained the winged angel and golden eagles while removing only the ground-level golden lions. The project architect described the arch as 'not primarily a monument dedicated to the dead, but to the living.' Arlington National Cemetery hosts hundreds of funeral services every month. It is, by any measure, primarily dedicated to the dead. The approach to it from the bridge has been, for nearly a century, deliberately restrained. A price tag of at least \$100 million does not change that.

The Commemorative Works Act requires congressional authorization, an environmental assessment, and a finding that the site is appropriate. None of those conditions has been met. The administration's claim that 1920s legislation connected to Arlington Memorial Bridge already provides the necessary authority is not a serious substitute for that process.

New Monumental Arch, File 8778
National Capital Planning Commission
June 3, 2026
Page 2

I urge this Commission to decline concept approval and to require that the statutory process be completed before any further review proceeds. The commemorative landscape at Memorial Circle took more than a century to compose. It deserves more than a compressed review schedule and a borrowed legal theory to undo it.

Thank you for the opportunity to testify before you today.

Sincerely,

A handwritten signature in black ink, appearing to read "B. C. Green", with a horizontal line extending to the right from the end of the name.

Bryan Clark Green, Ph.D.

June 3rd 2026

Jimi Shaughnessy Testimony to The National Capital Planning Commission regarding project: New Monumental Arch, file # 8778

I am here today to voice my opposition to the planned construction of the memorial arch. I speak as a private citizen: a Marine Corps combat veteran, son of a veteran, and grandson of generations of combat veterans spanning nearly 200 years.

Buried in Section 60 are my great-grandfather and great-grandmother. He was a combat veteran who led the charge on horseback against Pancho Villa. She was a combat nurse who tended to wounded young men during World War II. They never questioned whether they should serve — only how long they would be permitted to.

As a young Marine, I was shaped by their example. Their commitment to service and country became values I carried through my own enlistment and combat tour — a tour in which I lost friends before I could learn their full names.

For what did the sons and daughters of America die? Was it for fame? Will your children line up to become fodder for someone's vanity?

Now a gigantic arch threatens to cast its shadow over my family, my friends, and my fellow leathernecks — a monument to self-aggrandizement rising over hallowed ground.

A 250-foot triumphal arch topped with golden statues and an observation deck is a profound disruption at the entrance to sacred soil. The space at the gates of Arlington exists as a threshold — a transitory passage between service and burial. To preserve that integrity, it must remain open and unobstructed.

Service members and their families navigate many transitions throughout a military career and beyond. The transition out of the military is among the most dangerous periods a veteran will face. That final transition — from service to rest — is not theirs to manage. It is ours. It falls to us, the living, to receive our wounded and our dead with the highest esteem and care.

An arch is not what they need.

Who is this arch for? Is it for me? The president has already answered that question — it is for him.

This arch would obstruct the very sight line of the bridge, a symbol of unity and reconciliation connecting those divided by war and grief. Rather than honoring that unity, it deepens a wound that has not yet healed.

Hasty construction is no path to a monument worthy of this nation. Previous memorials were shaped by extensive public input and rigorous agency review, ensuring that the final design reflected our shared values. This proposal has had neither.

Others have already raised the serious safety hazards of placing a monument in a roundabout at a high-traffic intersection — consistent with this administration's pattern of placing pedestrians in harm's way.

Meanwhile, funding has been stripped from the VA, NPS, and DOI, degrading the capacity of the very agencies that provide direct services to veterans and their families. If you want to truly support the men and women who served, direct this money to those agencies. Our National Park Service is an ideal place for transitioning service members to find meaningful careers in public service — and healing along the way. Park staff provide safety, accessibility, and veteran-specific programming every single day.

How will this project be funded? With tax dollars? Redirected entrance fees from parks across the country? Anonymous private donations flowing into another undisclosed fund? The public deserves an answer.

No one needs this arch.

It is inappropriate, unnecessary, insulting, and a waste of our land, our time, and our money.

If the president wants his own arch, he is welcome to sift through the rubble of the East Wing demolition piling up along the banks of the Potomac and build one himself.

Jimi Shaughnessy

USMC Combat Veteran (2003-2010)

Testimony of James Lardner



One of the great glories of this city, for visitors and residents alike, is the Lincoln Memorial after dark. The proposed arch, as many veterans and others have noted, would block our view of the Memorial, day and night, from most places on the Arlington side of the river. As other critics point out, its massive size and the winged figures on top make the arch reminiscent of the celebratory architecture of brutalist dictatorships more than democracies. But beyond those powerful considerations, the arch, with its decorative floodlighting and FAA-mandated clearance lighting, would make the Lincoln Memorial at nighttime a dimmer and less striking sight from almost every direction.

TESTIMONY OF DAVID SCOTT PARKER TO THE NATIONAL CAPITAL PLANNING COMMISSION

HEARING ON JUNE 4, 2026, REGARDING THE PROPOSED “TRIUMPHAL ARCH”

Thank you, Chairman Scharf and Commission members.

I’m David Parker, a practicing architect for 35 years and Fellow of the American Institute of Architects. As a preservationist, I appreciate your deliberation of the current proposal and would like to make a few observations:

First, the proposed arches’ LOCATION at Memorial Bridge between Arlington National Cemetery and the Lincoln Memorial is a National Register listed landscape and site “*designed to create a physical and symbolic connection between the North and South.*” The overriding significance of this relationship created by Washington’s 1902 McMillan plan to symbolize national unity, and the historic viewshed between these two solemn landmarks, cannot be diminished and should not be impeded. The fact that views will be obscured by the proposed structure from various vantage points is undeniable.

The HEIGHT of the proposed arch exceeds Washington’s “HEIGHT OF BUILDINGS ACT OF 1910”, which generally limits structures to a maximum of 130’ and the NCPC Project Summary notes that the proposed 250’ height of the arch has *yet* to be justified. The NCPC report also observes that the proposed arch is only 3000 feet from Reagan-National Airport (substantially closer than 2 miles minimum distance and 200’ maximum height mandating FAA review) and that is in the immediate flight path of two major runways. All of which begs the question—*why this high?*

The proposed arch has been touted by the applicant as necessary to compete with other cities with its immense SIZE as a prerequisite to be *larger* than any other monumental arch in the World. This justification assumes that physical scale and DOMINANCE are more essential than meaning, or the appropriateness of scale to this very solemn setting and quite specific context.

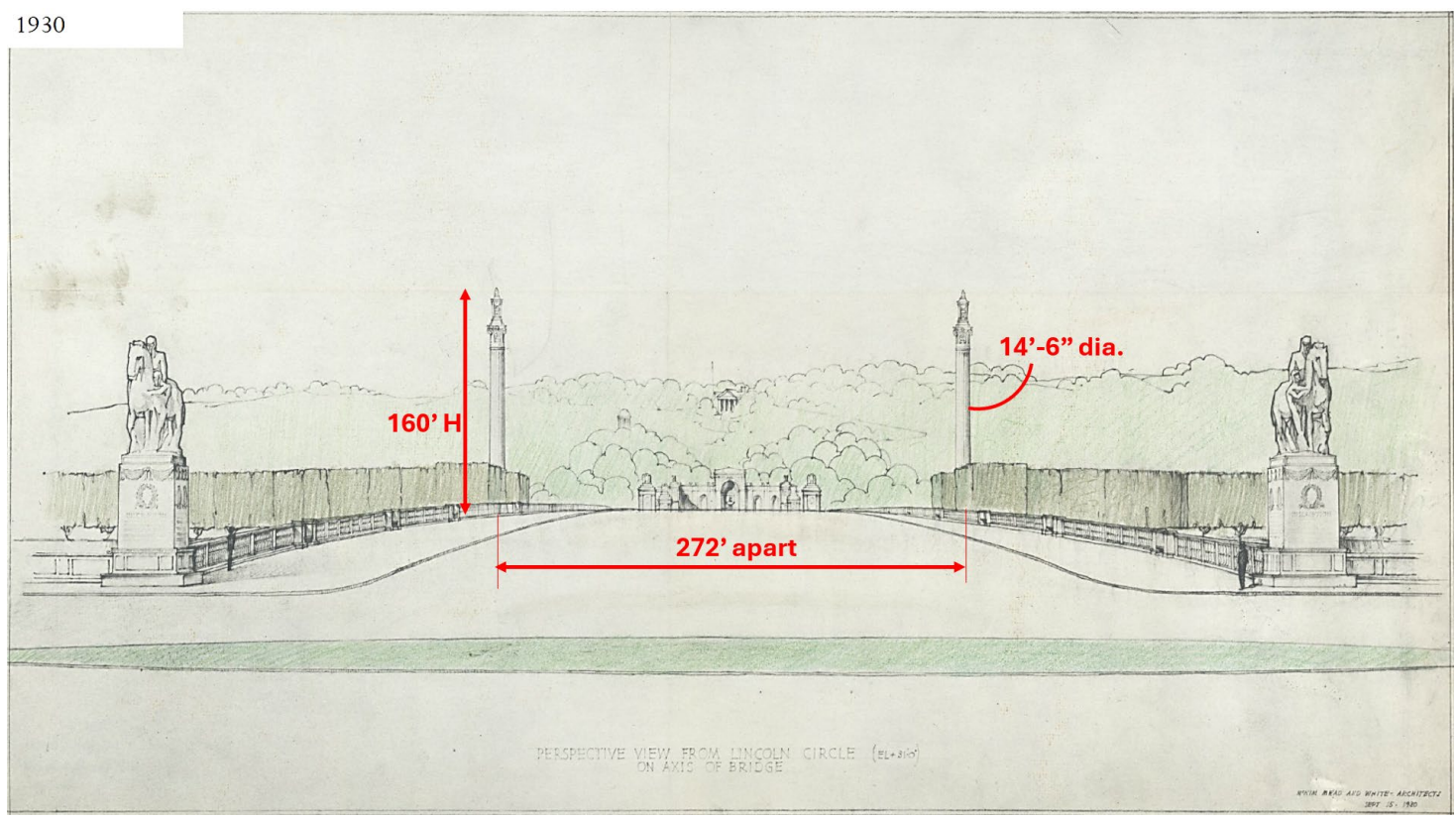
The SYMBOLISM of the proposed arch itself is contradictory and incongruent in this place. “TRIUMPHAL” arches throughout history have been built to “*symbolize specific military victory, imperial power and political legacy, or to honor victorious generals and emperors while acting as state propaganda.*” The historical association of triumphal arches is inconsistent with the vague explanations currently being offered as a rationale for this immense structure.

According to the applicant, the PURPOSE of this arch “*is to celebrate the triumphs of the American people*” however the overriding solemnity of this specific location codified by the McMillan Plan is ignored by this very generalized trope.

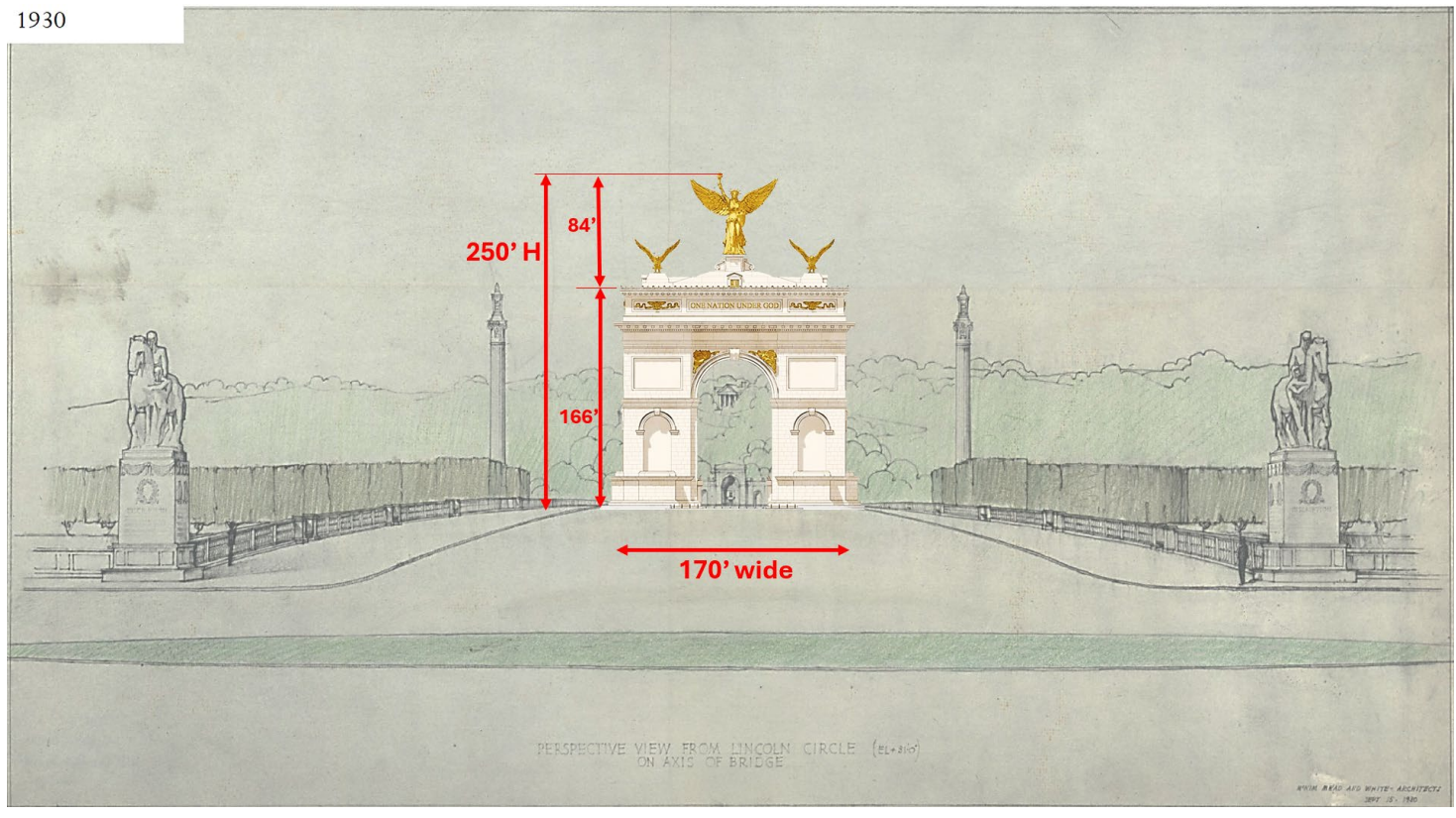
Additionally, the MATERIALS and ORNAMENTATION PROGRAM for the many surfaces and the immense 41’H x 21’W panels on all sides of the arch have not been defined. SCALE in renderings can be misleading, and each of these currently blank panels is as large as a four-story townhouse. *What will any inscriptions there say and who will any sculptures commemorate or glorify?*

The "COMMEMORATIVE WORKS ACT" signed into law by President Ronald Reagan on November 14, 1986, 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." Relative to this law, please review the comparative images below of a pair of tall columns once suggested but never built, which have been cited by the applicant as precedent for the current Triumphal Arch.

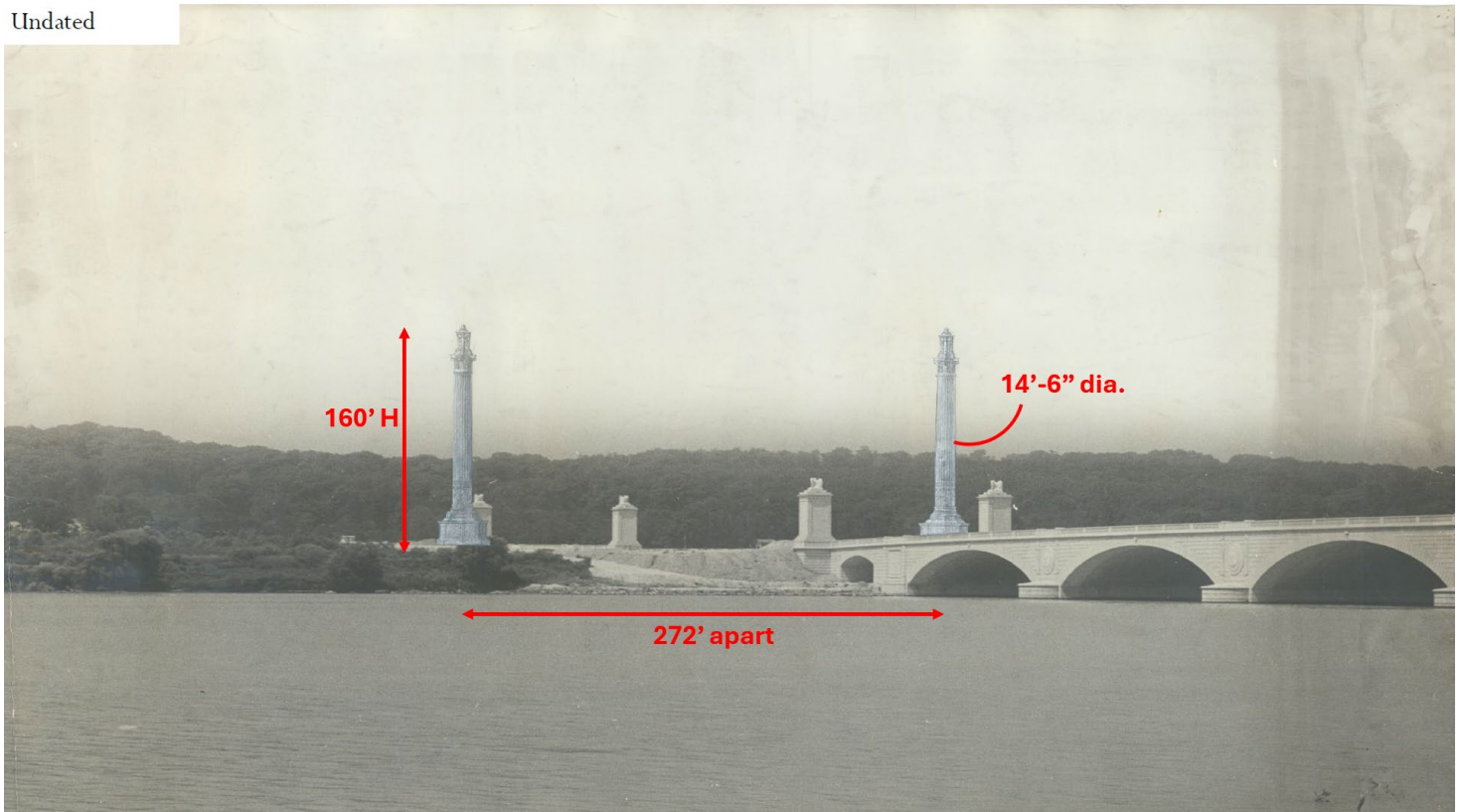
1930



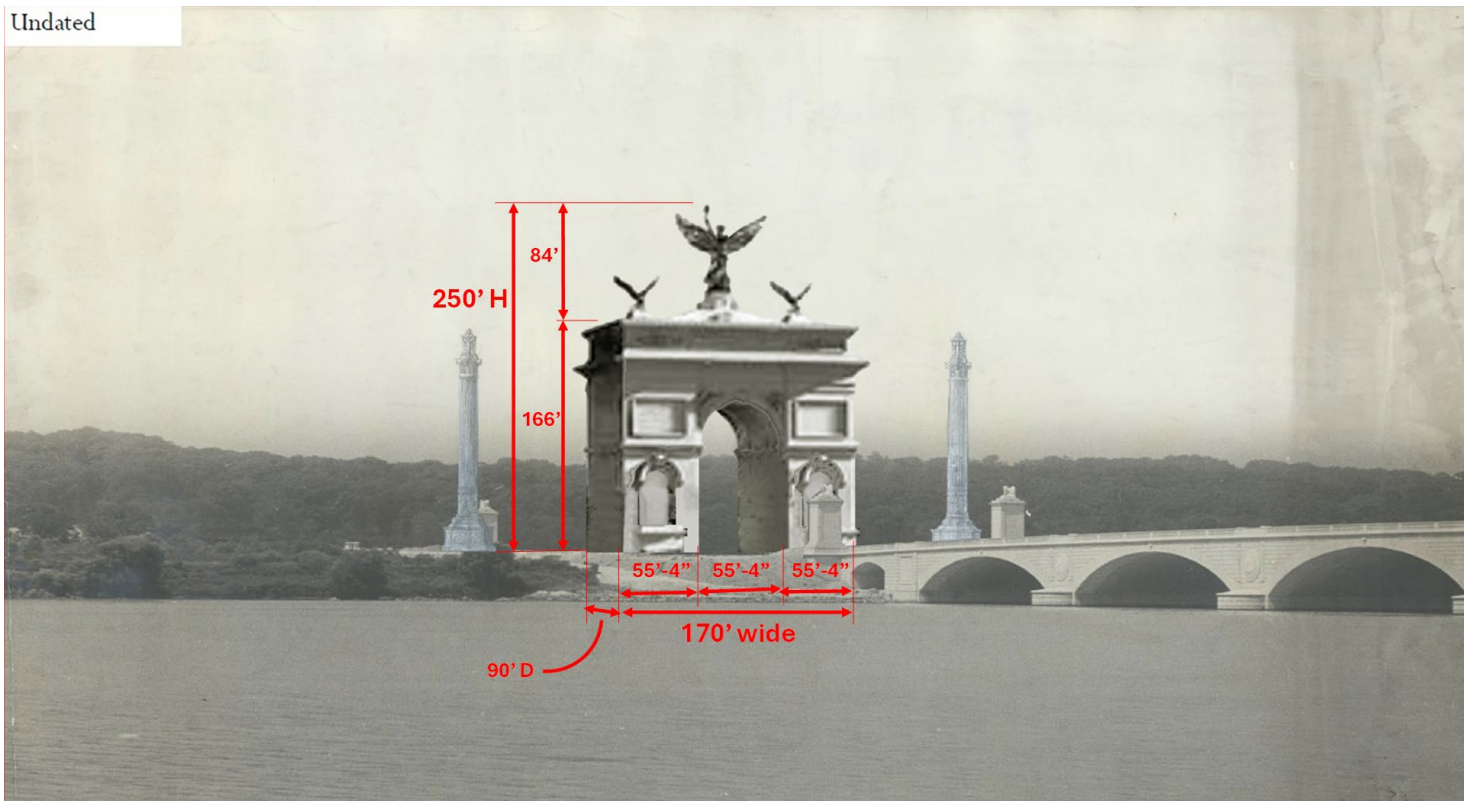
1930



Undated



Undated



The Commemorative Works Act requires that the current project be approved by Congress, and clearly the columns suggested but never built 100 years ago have nothing whatsoever to do with the current Triumphal Arch.

Thank you.

David Parker, FAIA

National Capital Planning Commission

My name is Paul Anthony Romano, III. I live in Springfield, Virginia. I am 76 years old, and I am a veteran. I have never protested for anything or against it in my life. In 1968 when I was inducted into the Air Force, I raised my right hand and swore to the Constitution of the United States against all enemies, foreign and domestic, and would bear true faith and allegiance to the same, and that I will obey the orders of the President of the United States and the officers above me according to regulations and the Uniform Code of Military Justice. Here today I stand in strong opposition to the building of the Arch at Memorial Circle. It is nothing more than an ego arch for the current occupant of the White House. It is a slap in the face to every veteran who is laid at rest not only in Arlington National Cemetery but every National Cemetery in the around the world. In 1994 I had a great pleasure and honor to attend a reunion for all the veteran who fought in Italy in World War II my stepfather being one of them who also received The Silver Star, two Bronze Medals for Valor and was a POW for a short period of time. I spent 16 days with the greatest generation of men and women who were called and STOOD THE WATCH just like all the individuals that are laid to rest in Arlington National Cemetery. They all STOOD THE WATCH. I have personal friends who gave their all their lives in Vietnam Andy Castelda, Sean Mashburn, Gearld Lotridge, John W. Kennedy, Rodger Holifield and Blucher Hall these were young men that I grew up but would never have the chance to grow old with, and someday I will be laid to rest there as well. Only Congress can approve the building of this arch. This administration has bypassed every legal process in any project they have wanted to do in Washington by adding the name of the current occupant of the White House to The Kennedy Center by tearing down the East Wing of the White House, which they were not going to touch to build this Big Beautiful Ballroom that and they were only going to use private donations, and a certain member of the Senate wants to pass \$1 billion legislation to add to the fund for the Big Beautiful Ballroom it is time to put a stop to this madness. When the legislation was introduced in Congress for the first time for the WWII Memorial, was in 1987 then similar legislation was introduced in 1989, 1991 and 1993. In 1993 President Clinton signed Public Law 103-32 authorizing the American Battle Monuments Commission to establish a World War II Memorial in the District. Not to bore you with all the dates and the process it took from 1987 to November 11, 2000 before ground breaking took place after many public hearings and approval from the Congress that was just 13 years. And on May 29, 2004 the Memorial was dedicated. So, from the time the first legislation was introduced to the dedication, 17 years, had passed,

yet this administration wants the proposed timeline and bypass all regulations to build on federal property. He just said the other night during a news interview that he does not have to get approval from Congress to be the Arch because the Interior Department (National Park Service) owns the land. Many of us in this room have been called to STAND THE WATCH, and we all would do it again if called. The individuals who are laid to rest at our National Cemeteries, and those of us who answered the call and those in the future who will answer the call to Stand The Watch and they will so what I am asking, begging this commission to do today is to STAND THE WATCH and vote no on the arch. It is nothing more than a monument to his own ego. Remember when he was in Normandy and did not want to look at the graves because the dead were suckers and losers, which he also said about Sen. John McCain, who was a true American hero.

Dear NCPC Secretariat,
The following is a copy of my testimony.

“One Nation Under God, indivisible, with Liberty and Justice for All”

On this arch, the word INDIVISIBLE is missing.

February 7, 2025, the current President established the White House Faith Office.

April 21, 2026, the current President released a video for the "America Reads the Bible" event, where he read 2 Chronicles 7:11–22, where the Lord says “seek my face.”

“One Nation Under God”

Exodus 34:17

Thou shalt not make to thyself any molten gods.

“One Nation Under God”

Deuteronomy 4:15

Keep therefore your souls carefully. You saw not any similitude in the day that the Lord God spoke to you in Horeb from the midst of the fire:

“One Nation Under God”

Ezekiel 14:6

Therefore say to the house of Israel: Thus saith the Lord God: Be converted, and depart from your idols, and turn away your faces from all your abominations.

“One Nation Under God”

Jeremiah 51:17

Every man is become foolish by his knowledge: every founder is confounded by his idol, for what he hath cast is a lie, and there is no breath in them.

“One Nation Under God”

Habakkuk 2:18

What doth the graven thing avail, because the maker thereof hath graven it, a molten, and a false image? because the forger thereof hath trusted in a thing of his own forging, to make dumb idols.

“One Nation Under God”

Psalms 113:12-16

The idols of the Gentiles are silver and gold, the works of the hands of men. They have mouths and speak not: they have eyes and see not. They have ears and hear not: they have noses and smell not. They have hands and feel not: they have feet and walk not: neither shall they cry out through their throat. Let them that make them become like unto them: and all such as trust in them.

“One Nation Under God”

Isaiah 42:17-23

They are turned back: let them be greatly confounded, that trust in a graven thing, that say to a molten thing: You are our god. Hear, ye deaf, and, ye blind, behold that you may see. Who is blind, but my servant? or deaf, but he to whom I have sent my messengers? Who is blind, but he that is sold? or who is blind, but the servant of the Lord? Thou that seest many things, wilt thou not

observe them? thou that hast ears open, wilt thou not hear? And the Lord was willing to sanctify him, and to magnify the law, and exalt it. But this is a people that is robbed and wasted: they are all the snare of young men, and they are hid in the houses of prisons: they are made a prey, and there is none to deliver them: a spoil, and there is none that saith: Restore. Who is there among you that will give ear to this, that will attend and hearken for times to come?

“One Nation Under God”

Romans 1:22-23

For, professing themselves to be wise, they became fools. And they changed the glory of the incorruptible God into the likeness of the image of a corruptible man and of birds, and of four footed beasts and of creeping things.

“One Nation Under God”

Acts 17:29

Being therefore the offspring of God, we must not suppose the divinity to be like unto gold or silver or stone, the graving of art and device of man.

So, when our government has a golden statue crafted and places the words “One Nation Under God” beneath it, I have to wonder, to what god are they attempting to place the United States of America under? With humility, I thank you for receiving this testimony.

Respectfully,

Danilo Augusto Feliciano

Good afternoon, Mr. Chairman and Members of the Commission. My name is Steven Rhodes, and I am a resident of Alexandria, Virginia. I am speaking today to request that the Commission deny concept approval for File Number 8778, the proposed New Monumental Arch at Memorial Circle.

This objection is not based on aesthetic preference, but on clear statutory, procedural, and logistical deficiencies that conflict with the Commission's planning mandates.

First, the proposal lacks the explicit legislative foundation required by federal law.

Because Columbia Island falls within Area I of the Monumental Core, this project is strictly governed by the Commemorative Works Act under 40 U.S.C. Section 8903. The statute explicitly mandates independent authorization from the United States Congress before any commemorative work can be established in this zone. Advancing a design concept via executive agency directives while bypassing direct congressional authorization represents a fundamental statutory circumvention. Furthermore, the inclusion of revenue-generating infrastructure—specifically commercial ticketing hubs and private event galleries—is structurally incompatible with the preservation mandates governing this restricted civic space.

Second, the project is moving forward in violation of standard administrative sequence.

Under Section 106 of the National Historic Preservation Act, federal agencies must complete a comprehensive consultation process to evaluate adverse effects on historic properties prior to taking actions that alter historic viewsheds. Inverting this process by deploying corporate contracting channels to conduct preliminary site work and geotechnical surveying fast-tracks physical execution before public and state historic preservation reviews are legally concluded.

Finally, the programmatic scale introduces unstudied logistical risks. Memorial Circle is a highly complex traffic rotary that manages significant daily commuter volumes and solemn funeral processions entering Arlington National Cemetery. Introducing a high-occupancy observation platform and commercial event venue at this exact intersection will inevitably create severe vehicular chokepoints, transit delays, and pedestrian hazards on the George Washington Memorial Parkway.

The National Capital Planning Commission has a statutory obligation to protect the operational and architectural integrity of the monumental core. Because this proposal bypasses Congress, shortcuts the National Historic Preservation Act, and threatens regional transit logistics, I urge the Commission to uphold its oversight mandate and deny approval to this concept layout.

Thank you.



THE INDEPENDENCE ARCH

AMERICAN DESIGN ALTERNATIVE FOR THE MONUMENTAL ARCH

My name is Shady Migally. I am an American architect and founder of ME Innovations, with more than 22 years of professional experience in architectural design across multiple countries.

I want to begin by saying that I fully support the vision of creating the Monumental Arch to celebrate America's 250th anniversary. This is an exceptional national opportunity.

However, rather than relying on copying historical European landmarks, especially the Arc de Triomphe in Paris, and adding an 84-foot-high winged statue on top to achieve the total height of 250 feet, I believe this project presents a rare opportunity to create what the American people truly deserve: a defining civic monument that reflects not only our strength and permanence, but also the American identity, culture, symbolism, innovation, and leadership.

In response to comments and concerns raised during recent reviews, I respectfully developed an alternative American design that complements rather than detracts from the surrounding historic landmarks while preserving the historic sightlines and relationship among the Lincoln Memorial, Arlington House, and Arlington National Cemetery through a more open architectural form. The proposal also enhances the public experience through integrated museum spaces and a panoramic rooftop terrace at 230 feet, offering a unique view of these landmarks that deepens visitors' connection with them.

At the center of the concept is an annual event that occurs every year on July 4th at noon, when sunlight passes through a calibrated oculus in the roof arch and illuminates a stone datum on the ground inscribed with words from the Declaration of Independence. This recurring event is intended to transform Independence Day into a shared national civic moment, uniting architecture, science, history, and public meaning while symbolizing a renewed "new birth of freedom" each year.

The goal is not simply to construct another monumental structure, but to create a timeless American landmark that inspires pride across generations and captures global attention as a masterclass in symbolic civic design.

I respectfully offer this concept as a constructive supporting study and as an example of the level of symbolic clarity, civic meaning, and uniquely American identity that this historic national project deserves as it continues to evolve.

Sincerely,

Shady Migally

ME INNOVATIONS

THE INDEPENDENCE ARCH

A Civic Threshold for America's 250th Anniversary



Envisioned as the largest Independence Arch in the world, this monument is designed to reflect the scale, confidence, and leadership of the United States while providing the American people with a work of architecture that is both timeless and uniquely theirs. The Arch is conceived not just as an object but as a national landmark carefully designed to blend in and harmonize with the nearby historical landmarks. It communicates unity, democratic ideals, and America's role as a global leader. Its form and presence create a powerful civic gateway that honors the nation's founding while projecting strength, openness, and continuity into the future.

WE NEED PRESTIGE, BEAUTY, & STRENGTH



The Independence Arch does not compete with the Lincoln Memorial or Washington Monument; it mediates between them conceptually, and aligned with the ceremonial axis connecting the Lincoln Memorial and Arlington National Cemetery.

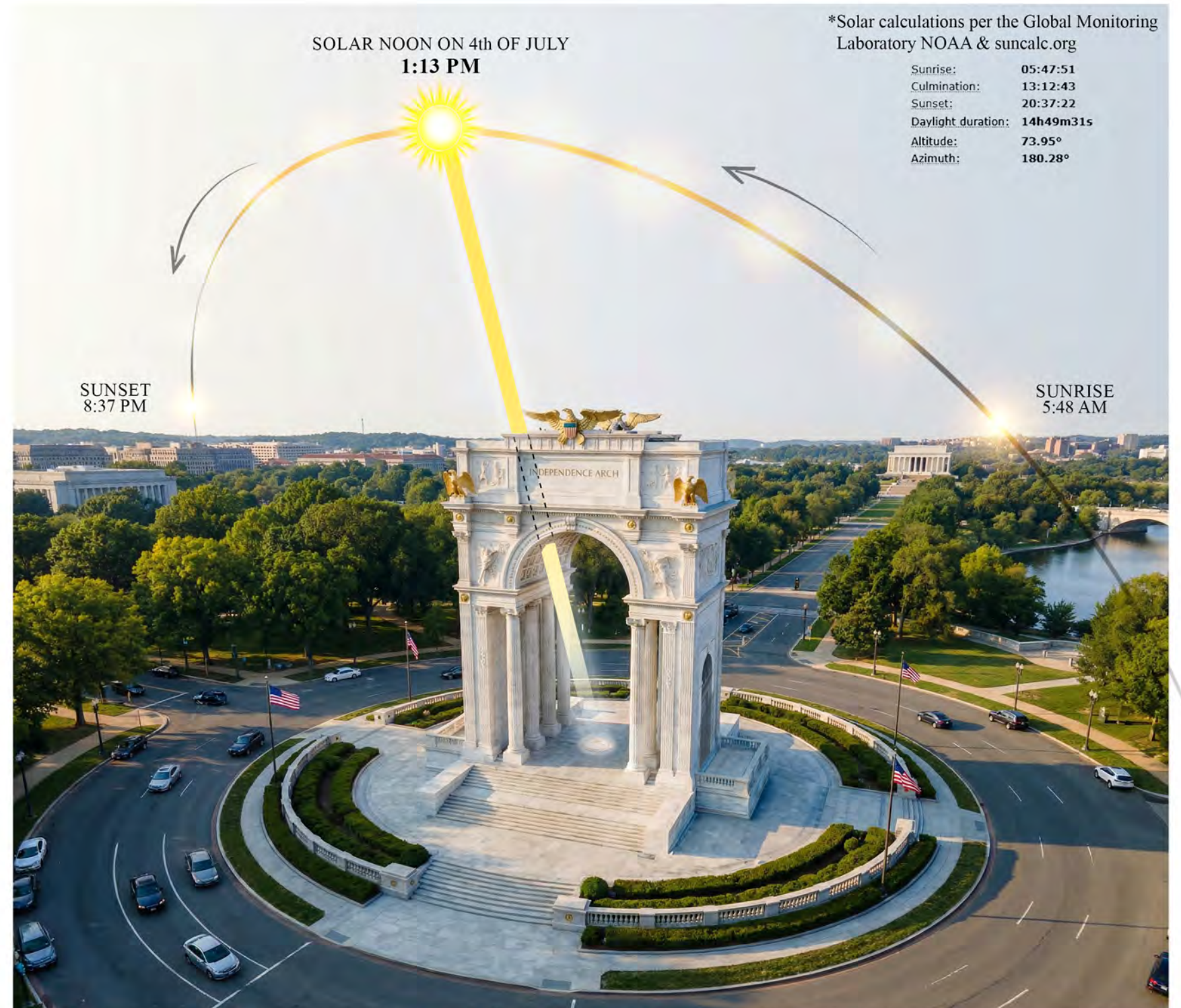
Interactive Architecture... An Annual Alignment of Light and Liberty

Only on **July 4th** at solar noon (approximately 1:13 PM EDT), the sun reaches its maximum annual altitude of roughly 74 degrees from the South in Washington, DC. At this moment, a circular roof oculus admits a concentrated beam of light through a specific diameter tube that reaches a calibrated stone datum at the floor, marking the anniversary through alignment with natural solar geometry rather than applied symbolism.

The circular illumination occurs only at the anniversary alignment. At other times, the light deforms or disappears, reinforcing independence as a condition achieved through alignment rather than permanence."



Site: Memorial Circle, a traffic circle located at the Virginia-side entrance of the Arlington Memorial Bridge.



An annual analysis of the July 4th sun path in Washington, DC, highlighting the specific solar altitude at 1:13 PM. At this exact time, the tubular structure is configured with a 16° tilt from the vertical to achieve direct alignment with the incoming solar beam.



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

In this way, the monument becomes an interactive civic instrument, without any mechanism or human intervention, marking Independence Day as a shared national event and reminding Americans each year that freedom is not static, but continually renewed, echoing the enduring promise of a ...

“ New birth of freedom ”

This will become a global event, drawing the attention of all nations to this historic moment every year. This will demonstrate that..

We are the biggest, most powerful nation.



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



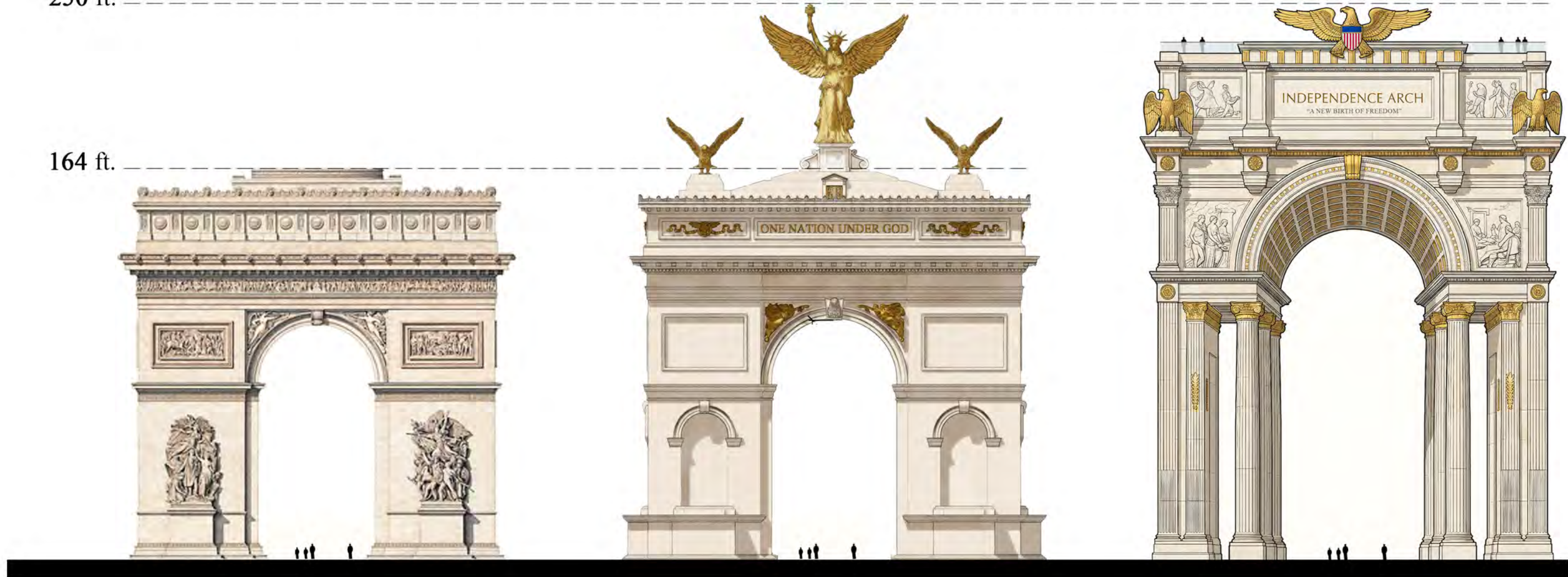
THE GRAND MUSEUM ATRIUM

Exhibition Hall: Features artifacts, documents, historical exhibits, and media screens detailing the history of the monument and its sculptures. (maximum occupancy is 250 people)

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

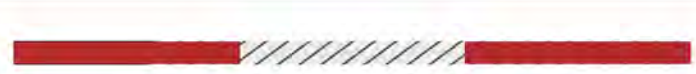
PROPOSED ARCH
WASHINGTON, DC

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.

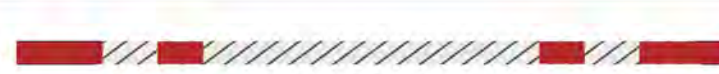
250 ft.



PROPOSED ARCH

*Base mass proportion is about
66% Solid to 33% void

← MASS
COVERAGE
PROPORTION →



ALTERNATIVE PROPOSAL

*Reduced base mass proportion is about
30% Solid to 70% void
- More opening, more visibility -

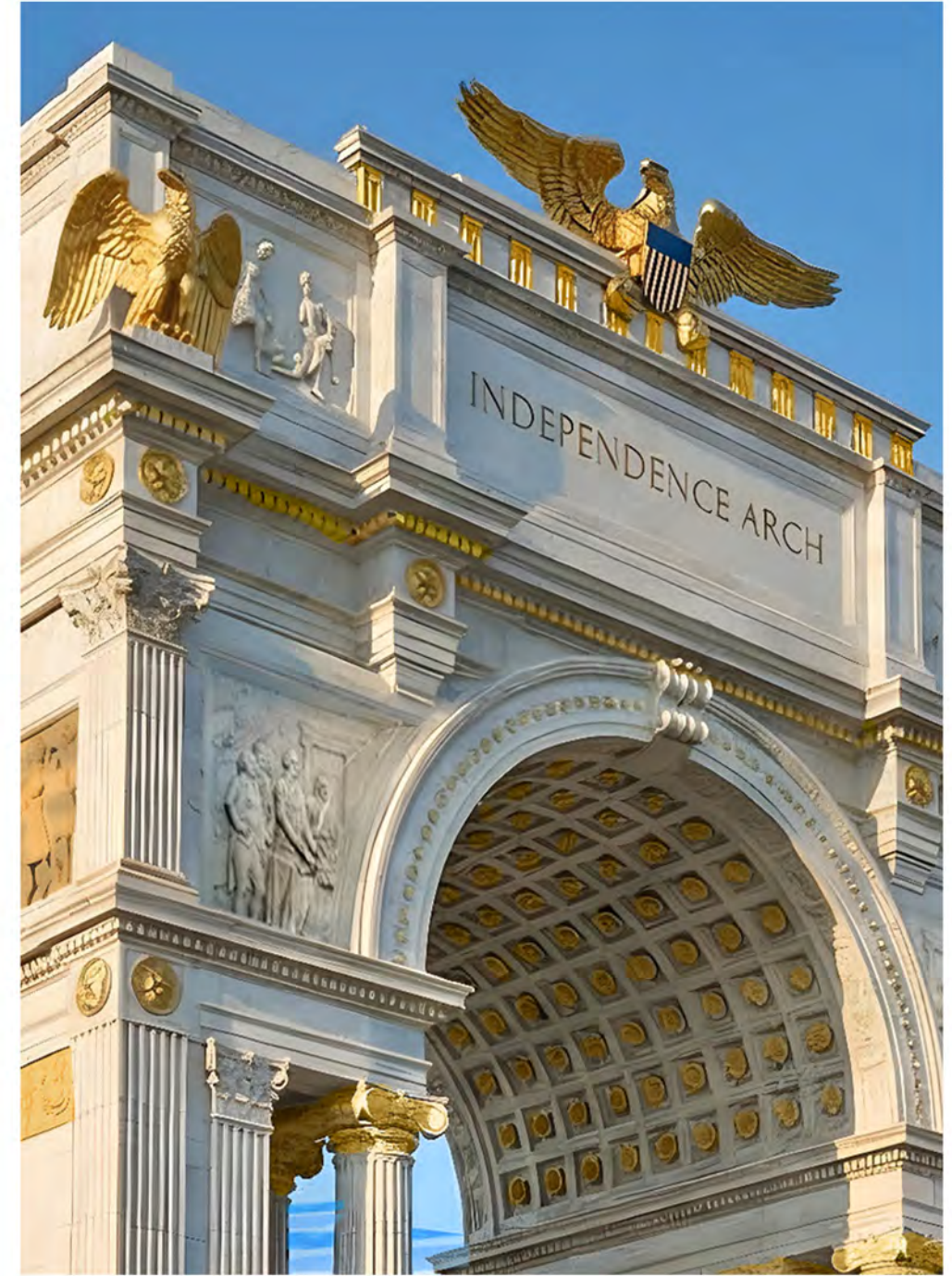


▲ Before

◀ After

The view from the Lincoln Memorial and the Arlington Memorial Bridge reveals the visual relationship among 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 and drawing focused attention to their symbolic and visual importance.



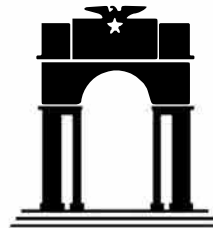
The wall surfaces of the Arch incorporate finely carved marble reliefs, restrained gilded accents, and engraved portraits that interpret pivotal moments surrounding the signing of the Declaration of Independence. Executed with classical discipline and material restraint, these elements are integrated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



Side view perspective showing more details on the side elevations, and an optional set of golden accents



Night view shot showing the effects of architectural and landscape lighting. Overall mood conveys solemnity, permanence, and national presence that is historically appropriate.



THE INDEPENDENCE ARCH

DESIGN AND VISUALIZATION BY



ME Innovations
Design . Architecture . 3D Visualization

Shady Migally

IF NEEDED, WE MIGHT PREPARE MORE INFORMATION, STUDIES, AND DETAILS FOR THE FEDERAL / CIVIC REVIEW,
OR PROVIDING MORE PHOTOS / VIDEOS WILL BE AVAILABLE UPON REQUEST



Thank you for giving me the opportunity to speak on the proposed arch. My name is Holly Berkley Fletcher, I hold a Ph.D. in American History, specializing in the Civil War era. I strongly object to the building of the proposed arch between Memorial Bridge and Arlington Cemetery because it is an affront to the history and symbolism of the site.

In 1864, General Montgomery Meigs made a deliberate decision to bury Union dead at the estate of his former friend and mentor, Confederate General Robert E. Lee. Meigs considered Lee's loyalty to the Confederacy an enormous betrayal of the United States, which it was, and he wanted to send a message, both to Lee personally and to nation, that the South's insurrection had a high cost. Meigs chose the hillside just below the mansion both to ensure the Lees would never want to live there again and for its beautiful vista over the Potomac towards the Capitol.

Decades later, in 1902, the Macmillan Commission designed and implemented a city plan for Washington based on L'Enfant's original ideas. (incidentally, L'Enfant is also buried at Arlington). The Lincoln Memorial was purposefully placed in the direct sightline of Arlington, with the Memorial Bridge connecting the two.

The symbolism of union, reconciliation, and the high price of freedom was intentional. It is one of the most meaningful pieces of civic design in the world. It was never meant to be triumphal. It is somber, reflective, and profound, much like Lincoln's 2nd Inaugural and his Gettysburg Address, which are etched into the walls of his memorial.

The proposed 250-foot arch, the message of which seems rather generic and unnecessary, would completely obstruct the view between Arlington the the Lincoln Memorial, and in fact would completely dominate the Washington skyline, as it is over twice the height of the Lincoln.

I can't help but think this offense is part of an intentional revision of history, in which the gravity of insurrection is minimized, the Confederacy's repugnant cause of white supremacy is sanitized, and the anniversary of our hard-fought democracy becomes a cowardly avoidance of the painful lessons of the past.

I am proud to be an American not in some shallow, triumphal sense. I am proud to be an American for the way we have learned, grown, and evolved from our failures together. Our triumph is defined by our commitment to continue becoming a more perfect union.

I am also a former CIA Africa analyst of almost 20 years who was raised in Kenya under a dictatorial regime. This arch, both in design and meaning, reminds me more of the tacky, bombastic, self-aggrandizing displays of the strongman vanity I have witnessed so much of there than the expression of a mature, dignified nation whose greatness is self-evident and proven over time through fidelity to its founding principles.

Thank you.

Testimony Before the National Capital Planning Commission

June 4, 2026

Good afternoon members of the Commission. My name is David Weinberg and I am a resident of Washington DC. I am here today to strongly oppose the proposed 250-foot United States Triumphal Arch at Memorial Circle. This project is a radical, unprecedented mistake that threatens Washington's historic skyline, bypasses democratic oversight, and creates immediate public hazards.

The most urgent issue is the sheer visual disruption. At 250 feet tall, this arch will completely dwarf the 99-foot Lincoln Memorial. It destroys the sacred, quiet axis connecting Arlington National Cemetery to the Lincoln Tribute, inserting a loud visual barrier into a landscape meant for solemn reflection. This ignores a core lesson from the historic McMillan Plan. Over a century ago, planners intentionally rejected massive entrance columns on the Virginia side of the bridge specifically to protect the quiet harmony of this very skyline.

Compounding this design flaw is a deeply flawed process. This project deliberately avoids standard public input and historic preservation reviews. It faces active federal lawsuits from veterans and direct opposition from lawmakers because it circumvents the democratic oversight required for our public spaces.

Finally, we cannot ignore the severe practical hazards. Memorial Circle is a vital, high-speed traffic roundabout for tens of thousands of daily commuters. Placing a major tourist attraction here without pedestrian safety studies will cause severe gridlock and put millions of visitors in direct physical danger.

We must not trade a century of carefully cultivated civic harmony for short-term monumentalism. I urge the Commission to reject this proposal.

Thank you.

Testimony before the National Capital Planning Commission, June 4, 2026
Regarding the proposed New Monumental Arch at Memorial Circle
Stephen Eubank

I'm here today representing my family and close relatives, 7 of whom would, I'm sure, be here if they weren't interred in the hallowed ground of Arlington National Cemetery—along with more than 400,000 others who served their country to defend our freedom and democracy.

The proposed Monumental Arch will be a monumental disgrace to the nation and a monstrous insult to the heroes in the cemetery. I hope those of you foisting it on us will be haunted forever by the ghosts of those 400,000.

I'm not an architect—a failing I seem to share with the majority of the planning commission. However, in the words of my architect brother, "Architecturally it's so awful it doesn't merit an architectural critique. It couldn't possibly be more unimaginative or unoriginal or uncreative. "

At nearly double the maximum height allowed under D.C.'s Height of Buildings Act, it is intentionally designed to obstruct views of the Lincoln Memorial, but highlight the Lee Mansion—the former home of the military leader of a war against the United States that was fought to maintain some people's claims that they owned other humans. Maybe you don't realize that Congress established the Lee Mansion memorial to honor his role in "promoting peace and reunion following the Civil War" and that Memorial Bridge was built to be a literal bridge spanning the gap between Lincoln and Lee and between us as Americans, to signify that we could heal the wounds of that war.

Yes, it's a good idea to create a monument to commemorate the 250th anniversary of our founding, but this is not the way to do it. There has been no public input, no considered planning. The majority of Americans don't want this thing. How does that befit a democratic nation's 250th anniversary? In my written remarks I've noted the planning and completion dates for monuments on the Mall.

Washington, planning begun in 1833. Monument completed in 1885.

Lincoln 1911 - 1922

Jefferson 1934 - 1943

Vietnam Vets 1979 - 1984

Korean War 1979 - 1995

FDR 1955 - 1997

George Mason ??? - 1997

WW II 1994 - 2004

MLK, Jr. 1984 - 2011

Eisenhower 1999 - 2020

Here are my take-home messages:

1) Presidents don't build monuments to themselves, nor do they define their own legacies; instead, we as a nation have clear processes to decide whom to honor and how.

2) Planning and construction take decades.

Why the rush in this case? Because, as Trump himself admitted, this is **not** a monument for the nation, but for himself.

There is no one less deserving of a monument than the man who perpetrates fraud on our courts in order to avoid \$100 million in back taxes and to pay off insurrectionists for loyalty to him above country.

There is no one less deserving of a monument in this spot than the man who tried to use graves of those he calls “suckers and losers” as the backdrop for a campaign ad.

There is no one less deserving to be honored with a statue of “Lady Liberty” than a man who wants to erase history, including the stories of those buried at Arlington who were immigrants [for example, 18% of WW I vets], who held at least 39 distinct sets of religious beliefs, and who were of all races, genders, and skin colors.

Let him build it at Mar-a-Lago and I’ll pay for a plaque to go with it, reading:

“My name is Ozymandias, king of kings:

Look on my works, ye Mighty, and despair!”

Submission to the National Capital Planning Commission (NCPC)

File No. 8778 — Proposed Memorial Circle Triumphal Arch

Applicant: Harrison Design — Submission dated May 7, 2026

Submitted by John Ayers, Washington, DC

June 2, 2026

Executive Summary

The Comprehensive Plan for the National Capital: Federal Elements, January 2026 (the “Comprehensive Plan” or the “Plan”) emphasizes, in its own words, “fundamental concepts of beauty and order,” not as a judgment about whether individual structures are attractive, but as a standard for the composition of the city as a whole: its visual hierarchy, its protected sight lines, and the spatial relationships among its civic elements that make Washington legible as a national capital. The Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, and Arlington House are not isolated landmarks that happen to align. They form one ceremonial sequence, held together in a single sight line, conceived by the McMillan Commission as what the Comprehensive Plan calls “a complete work of civic art.” The importance of that sequence derives not from any single structure but from the spatial relationships among its elements — relationships NCPC’s own Comprehensive Plan is charged with protecting.

The planning question this proposal poses is whether inserting a 250-foot triumphal arch into the center of that sequence — at the western terminus of the Mall’s primary ceremonial axis, where the Comprehensive Plan calls for particular vigilance against visual incursion — preserves the composition or destroys it. The applicants’ own submission answers that question. Their “View from Lincoln Memorial — After” (Sheet 24) shows the arch rising to dominate the full axial terminus of Arlington Memorial Bridge, displacing the Lincoln Memorial from its position as the western anchor of the Mall axis and the gateway to the Arlington ceremonial sequence beyond. The Washington Monument views, the Arlington House views, and every approach across the Potomac tell the same story. The applicants have documented, in their own materials, that the proposed arch is a visual incursion into the Primary East-West Vista — a formally designated Preeminent Viewshed whose contributing elements are listed in the National Register of Historic Places.

The Comprehensive Plan contains at least twelve numbered policies that strongly support if not directly call for rejection of this proposal. They protect the visual hierarchy of national symbols, the openness of axial termini, the settings of National Historic Landmarks (“NHL”), the scale of memorial elements relative to their surroundings, and the integrity of designated view corridors. The proposal conflicts with every one of them. It also lacks the independent review that would normally give prior approval by the Commission of Fine Arts (“CFA”) its evidentiary weight. The CFA that advanced this concept was reconstituted in its entirety by the project’s sponsor before the vote.

The Comprehensive Plan does not exist to help decision-makers find places to put monuments. It exists to help determine when a monument does not belong. This one does not.

The members of National Capital Planning Commission, stewards of our capital city, are not being asked whether the proposed triumphal arch is impressive, expensive, classical, or presidential. They are being asked whether the proposal is consistent with the Commission’s own

Comprehensive Plan for the National Capital — the document NCPC has itself described as “the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review.”

That distinction matters.

Reasonable people can disagree about whether a monumental arch is attractive. The question before the Commission is different: does the proposal advance or undermine the planning principles the Commission has adopted to guide development within the Monumental Core? Those principles are not ambiguous. They are codified, numbered, and applied by NCPC staff in every project review.

Applicable Comprehensive Plan Policies

The Comprehensive Plan states that its Federal Elements — along with the District Elements, federal and District agencies’ systems plans, individual installation master plans and subarea plans, development controls, and design guidelines — “constitute the road map for NCPC’s land use planning and development decision-making processes in the [National Capital Region].” (Comprehensive Plan Introduction, p. 11).

The Federal Elements contain the directly applicable policies for evaluating this proposal. The Plan defines Washington’s symbolic identity as expressed, in part, through “a visual order of importance (hierarchy) that emphasizes symbols and structures” visible “from both composite skyline views and linear views along particular streets.” (Urban Design Element, p. 17) It further states that “from closer vantage points, the low scale of buildings and spacious settings around other landmarks, such as the White House, Lincoln Memorial, Jefferson Memorial, and Smithsonian museums, creates a fitting character for a capital city set in natural beauty” (Urban Design Element, p. 19) and that “the urban design principles that give preeminence to its most important national symbols, and particular viewsheds to them, has generally been retained.” (Urban Design Element, p. 19). The General Principles for Viewshed Maintenance in the Technical Addendum state that NCPC supports the principle of creating “a wide visual frame and natural backdrop (‘breathing room’) around the U.S. Capitol, White House, Washington Monument, and other major symbolic elements within the monumental core.” (Technical Addendum to Urban Design Element, p. 10.) The Lincoln Memorial is among those major symbolic elements. The proposed arch eliminates its breathing room on the western approach entirely and directly inverts the visual hierarchy the Plan is charged with protecting.

The Urban Design Element’s “Significant Structures + Civic Art” section includes a Policy Guide box for proposals involving significant structures, civic art, and the symbolic skyline. It directs readers to policies B.1, B.3, B.4, and B.5 as the applicable framework, stating: “For policies relating to significant structures, civic art, and the symbolic skyline, please see:” B.1 Capital City Character: General Urban Design Policies; B.3 The L’Enfant City and the Public Realm; B.4 The Monumental Core; and B.5 Preeminent Viewsheds and View Corridors. (Urban Design Element, p. 11) . The Lincoln Memorial and Arlington House are both specifically enumerated in that section as Gateway structures, and Memorial Circle sits on the preeminent view corridor connecting them shown on the accompanying map. The Plan has already identified this site, these structures, and these policies as the relevant analytical framework. The applicants’ proposal falls squarely within it.

Policy UD.B.1.3 calls on the Commission to “[p]reserve Washington’s picturesque, horizontal character, and reinforce the Height Act.” (Urban Design Element, p. 22.) The proposed arch is 250 feet tall. Within the District of Columbia, the Height Act would prohibit it. The applicants have

sited the structure in Arlington County, on the Virginia side of Memorial Circle, where the Height Act does not apply. The Comprehensive Plan directly addresses this jurisdictional gap. The Urban Design Element acknowledges that “[b]ecause the Height Act does not extend beyond the District, a conceptual understanding of building height in Arlington with respect to the primary vistas is defined through a resolution of the Arlington Board” — a resolution it characterizes as non-binding. (Urban Design Element, p. 13.) The Plan then states: “[i]t is critical to engage local jurisdictions to address mutual interests in the overall urban design quality of the nation’s capital and region, and to prepare strategies that holistically consider the quality of the primary vistas.” (Urban Design Element, p. 13.) The 2013 Height Master Plan, cited in the Comprehensive Plan, reaffirmed the Height Act’s principles as continuing to serve national interests. (Technical Addendum to the Urban Design Element, p. 4.) NCPC is the one body whose jurisdiction and mandate bridge the DC-Virginia boundary. The Commission’s review of this proposal is precisely the mechanism the Plan contemplates for protecting primary vistas from Virginia-side development the Height Act cannot reach. Approving a 250-foot structure that would be illegal on the DC side of the circle would render that mandate meaningless.

Policy UD.B.1.4 (Capital City Character) calls on the Commission to “[v]isually reinforce the preeminence of the U.S. Capitol, White House, Washington Monument, and other major nationally significant resources by protecting the visual frame around them” and to “[c]arefully examine the use of vertical elements within the setting of major national resources.” (Urban Design Element, p. 22.) The Lincoln Memorial is among those major nationally significant resources. A 250-foot arch placed directly on its approach axis — interposing a new dominant vertical element between the Lincoln Memorial and every vantage point across the Potomac — is precisely the kind of intrusion this policy is designed to prevent.

Policy UD.B.3.1(2) (The L’Enfant City and the Public Realm) is the most directly applicable provision in the element. It calls on the federal government to “[p]rotect the visual openness and functional qualities of L’Enfant public spaces by preventing visual incursions into the rights-of-way wherever possible,” and states explicitly that this protection “is particularly important at intersections and termini of radial and axial avenues.” (Urban Design Element, p. 27.) Memorial Circle is precisely such a terminus. The proposed arch would introduce a 250-foot structure at the location the Comprehensive Plan identifies as requiring the greatest vigilance against visual incursion.

Policy UD.B.4.1 (The Monumental Core) calls for planning in and around the Monumental Core to “consider the relationship between the design of new development and significant adjacencies, such as major public spaces, urban and historic fabric, and along the preeminent viewsheds described within this element.” It further calls for new development to “not infringe on the civic qualities and integrity of the National Mall and the surrounding monumental core” and to “respect existing lines of sight from the National Mall and existing relationships, including height and mass within that line of sight.” (Urban Design Element, p. 29.) The 1902 McMillan Commission drew the Arlington Memorial Bridge axis directly between the then-proposed Lincoln Memorial and Arlington House as a deliberate act of civic design. The bridge itself is identified in the Urban Design Element as a “Capital Gateway” that “provides a formal processional entry into Washington, DC” — an entry point where “elements of the monumental core are visible.” (Urban Design Element, p. 8.) Inserting a 250-foot arch at the midpoint of that processional does not respect the existing relationships. It displaces them.

Policy UD.B.5.1 (Preeminent Viewsheds and View Corridors) calls on the federal government to “[p]rotect and enhance panoramic and street-level linear views of the U.S. Capitol, White House, Washington Monument, and other major skyline elements” and to “[r]emove visual intrusions to increase visibility.” (Urban Design Element, p. 33.) The Technical Addendum defines

a visual incursion as a built element that, among other criteria, “detracts from the preeminence of a major national resource along a view corridor,” “visually severs major landscape elements,” or “detracts from the character of historic, cultural, or other open space areas.” (Technical Addendum to Urban Design Element, p. 11.) The proposed arch satisfies all three criteria simultaneously — as confirmed by the before-and-after visualizations submitted by the applicants across eleven vantage points. The “View from Lincoln Memorial — After” (Sheet 24 of the applicants’ submission) shows the arch rising to dominate the full axial terminus of Arlington Memorial Bridge, displacing the Lincoln Memorial from its position as the western anchor of the Mall axis and the gateway to the Arlington ceremonial sequence beyond.

The Technical Addendum’s inventory of Preeminent Viewsheds makes this concrete. The “Primary Vista East-West Vista” — the east-west axis running from the U.S. Capitol along the National Mall to the Lincoln Memorial and westward to the horizon — is a formally designated Preeminent Viewshed whose contributing elements are listed in the National Register of Historic Places as part of the L’Enfant Plan of the City of Washington nomination. The Addendum documents three specific observation points within this viewshed: View 1 from the west steps of the U.S. Capitol; View 2 from the west facade of the Washington Monument; and View 3 from the west portico of the Lincoln Memorial. (Technical Addendum to Urban Design Element, p. 19). The Addendum’s own description of existing conditions states that the Arlington backdrop is currently perceived as “fairly uniform, without individual vertical elements interrupting the skyline and competing with the visual frame around the Lincoln Memorial and Washington Monument” — and identifies this condition as what must be maintained. The proposed arch is precisely such an individual vertical element at precisely these observation points. The applicants’ own submission documents the interference: their Washington Monument before-and-after visualizations correspond to View 2, and Sheet 24 corresponds to View 3. Both show the arch as the dominant object in this formally designated, NRHP-listed Preeminent Viewshed. Arlington National Cemetery is separately identified in the Technical Addendum’s inventory of publicly accessible federal lands with documented views as offering a “view to the monumental core; general panoramic view of the skyline.” (Technical Addendum to Urban Design Element, p. 35.) The proposed arch would be sited directly within that documented view corridor, between Arlington National Cemetery and the monumental core it looks toward.

The Historic Preservation Element adds further authority. Policy HP.A.2 calls on the federal government to “[p]rotect the reciprocal views along the rights-of-way established by L’Enfant streets, as well as to and from squares, circles, and reservations.” (Historic Preservation Element, p. 5.) The visual relationship between the Lincoln Memorial and Arlington House — the reciprocal view across the Potomac that the McMillan Commission built the bridge axis to formalize — is exactly what this policy protects. Policy HP.D.3 independently calls on the federal government to “[p]rotect the settings, including viewsheds, greenspaces, and tree canopies, of historic properties, as integral parts of the property’s historic character.” (Historic Preservation Element, p. 9.) Three National Historic Landmarks are independently affected. Arlington Memorial Bridge’s setting — the open ceremonial approach across the Potomac — is inseparable from its historic character. Arlington House’s setting includes its designed eastward prospect toward the Lincoln Memorial and the capital beyond — the view from which Robert E. Lee made his fateful decision in 1861, and which remains a formally documented feature of the property’s historic significance. Arlington National Cemetery’s setting includes the ceremonial approach along Memorial Avenue and Memorial Circle, integral to the solemn character the cemetery has carried since 1864. The proposed arch would permanently intrude into all three settings. No Section 106 consultation record appears in the applicants’ submission.

The Parks and Open Space Element adds five further directly applicable policies.

Policy POS.A.1 calls on the federal government to “[r]ehabilitate, protect, and, where feasible, enhance historic designed landscapes and civic streets, including squares, circles, and triangles associated with The Plan of the City of Washington.” (Parks & Open Space Element, p. 13.) Memorial Circle is a designed civic circle associated with the McMillan Plan’s ceremonial approach to Arlington and falls within the category of historic designed landscapes this policy is charged with protecting.

Policy POS.A.2 calls on the federal government to “[p]rotect and maintain both the north-south and east-west cross-axes of the National Mall and its historic landscape as a complete work of civic art.” (Parks & Open Space Element, p. 13.) The east-west axis extends to the Lincoln Memorial and westward toward Arlington. The proposed arch intrudes into that axis at its most sensitive transitional point.

Policy POS.A.7 calls on the federal government to “[p]rotect or restore viewsheds that contribute to cultural landscapes and the aesthetic quality, historic significance, and visitor experience of the parks and open space system.” (Parks & Open Space Element, p. 13.) The viewshed from Arlington National Cemetery to the monumental core, the eastward prospect from Arlington House toward the Lincoln Memorial, and the reciprocal view from the Lincoln Memorial across the Potomac each contribute directly to the cultural landscape, historic significance, and visitor experience of the most significant commemorative parks in the national system.

Policy POS.C.5 calls on the federal government to “[a]void the introduction of visual incursions into the rights-of-way or placement of physical elements that would detract from the views of national memorials, civic institutions, or landmarks.” (Parks & Open Space Element, p. 29.) The Lincoln Memorial is a national memorial. The proposed arch is a physical element placed on its approach axis that the applicants’ own submitted visualizations confirm detracts from its view. POS.C.5 does not permit a balancing test. It says “avoid.”

Policy POS.C.6 states that “[m]emorial elements should complement and not compete with the scale of the surrounding landscape and built environment.” (Parks & Open Space Element, p. 29.) The surrounding landscape at Memorial Circle is Arlington Memorial Bridge, its pylons at approximately 40 feet, and an open ceremonial approach deliberately maintained at human scale for over a century. A 250-foot arch with a gilded sculpture group does not complement that landscape. It overwhelms it.

The Comprehensive Plan’s own design guidance for commemorative works states the governing principle plainly: “Memorial or landscape elements may be used to frame or define an edge condition of a view corridor to maintain the openness of vistas ... but new commemorative works should not detract from an existing prominent viewshed.” (Parks & Open Space Element, p. 28.) The Lincoln-to-Arlington viewshed is among the most prominent in the nation’s capital. The applicants’ own before-and-after visualizations demonstrate that the proposed arch detracts from it. The Comprehensive Plan has already answered the question this proposal poses.

The Planning Legacy of the Site

The Comprehensive Plan's Introduction Chapter describes the L'Enfant and McMillan Plans as "the foundation of modern Washington" (Comprehensive Plan Introduction, p. 6) and lists under Principle 1 the need to "preserve historic properties and important L'Enfant and McMillan Plan design features." (Comprehensive Plan Introduction, p. 8.) Policy POS.A.2 encodes this directly, calling on the Commission to "[p]rotect and maintain both the north-south and east-west cross-axes of the National Mall and its historic landscape as a complete work of civic art." (Parks & Open Space Element, p. 13.) That phrase — "complete work of civic art" — is the McMillan Commission's own conceptual framework, now codified as NCPC policy. It means the axis is not a collection of individual monuments that can be evaluated in isolation. It is a composition, and any intervention must be evaluated against what it does to the composition as a whole. An interesting precedent for how that principle applies to Memorial Circle is the McMillan Commission's own treatment of the Baltimore and Potomac Railroad on the Mall. The Commission did not remove the railroad because it was unattractive. It removed it because it interrupted the civic composition — because the Mall's designed openness was not emptiness but the medium through which the relationships among the Capitol, the Monument, and the Lincoln Memorial were made legible. That principle — that compositional openness is itself a planning value, not merely an aesthetic preference — is the foundation on which every subsequent protection of the Mall axis and its approaches has rested. Memorial Circle's openness serves exactly that function on the Arlington axis. The existing pylons, at approximately 40 feet, represent the considered answer to what scale of structure belongs at the circle: large enough to mark the threshold, small enough to preserve the view through it. Policy UD.B.3.1(2) encodes this principle directly, calling for protection of visual openness at axial termini. The McMillan Commission established why.

Memorial Circle is open not because no one thought to fill it. It is open because successive generations of planners understood its role as the visual fulcrum of the Lincoln-to-Arlington sequence. Stand at the Lincoln Memorial and look west: the bridge leads the eye across the river and through the circle, and if the circle is open, the eye continues up Memorial Avenue to Arlington House on the ridge. The sequence reads as a single continuous gesture — Lincoln, bridge, circle, avenue, Arlington House — each element handing off to the next. The circle is where the bridge ends and the avenue begins, and its openness is what makes that handoff legible. Arlington Memorial Bridge was designed in 1925 as an explicit symbol of national reconciliation: the Union president and the former Confederate general's home connected by a single axis. Memorial Circle is the point at which that reconciliation gesture makes contact with Virginia soil. Policy HP.A.2's protection of "reciprocal views ... to and from squares, circles, and reservations" applies with particular force here: the reciprocal view between Lincoln and Arlington House is the designed meaning of the site, and the circle is where it pivots.

The form the applicants have chosen compounds the siting problem. A *triumphal* arch — the applicants' own title block uses that phrase - places that specific form at the precise point where the Lincoln-Arlington reconciliation axis makes its Virginia landfall is not a neutral design decision. It is a direct typological contradiction of the commemorative purpose the site already carries. The Comprehensive Plan's commemorative design guidance calls for new works to "not detract from an existing prominent viewshed." (Parks & Open Space Element, p. 28.) The site has a commemorative identity. The proposed form conflicts with it. That is a planning finding, not an aesthetic judgment, and it falls squarely within the Commission's mandate to evaluate whether a proposed commemorative work is appropriately sited.

The Planning Question

The Lincoln Memorial, Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, Arlington National Cemetery, and Arlington House are not isolated landmarks. Together they form one of the most significant ceremonial and commemorative sequences in the United States. The importance of that sequence derives not from any single structure but from the spatial relationships among them — relationships the McMillan Commission conceived, the Congress funded over decades, and NCPC's own Comprehensive Plan is charged with protecting.

The Comprehensive Plan does not exist to help decision-makers find places to put monuments. It exists to help determine when a monument does not belong.

That determination is made easier here by the fact that the applicants' own submission makes plain: the Harrison Design package contains no written policy analysis, no commemorative purpose statement, and no explanation of how the proposal is consistent with the Comprehensive Plan. Significant interior program areas are labeled "PROGRAM SPACE TBD." The Commission is being asked to approve a permanent intervention in one of the nation's most protected civic landscapes on the basis of drawings alone, for a structure whose purpose has not been sufficiently defined.

Viewed through that lens, the planning question is straightforward: does inserting a 250-foot triumphal arch into the center of this ceremonial sequence — at the western terminus of the Mall's primary ceremonial axis, where the Comprehensive Plan calls for particular vigilance against visual incursion — preserve the composition or interrupt it? Policies UD.B.1.3, UD.B.1.4, UD.B.3.1(2), UD.B.4.1, UD.B.5.1, HP.A.2, HP.D.3, POS.A.1, POS.A.2, POS.A.7, POS.C.5, and POS.C.6, read together with the Commemorative Works Act, the Plan's General Principles for Viewshed Maintenance, and its own commemorative design guidance, provide the answer.

Public Engagement and the Coordination Obligation

The Historic Preservation Element states that "the Commission recognizes that sustained citizen engagement in the public process is fundamental to the broad acceptance of historic preservation decisions." (Historic Preservation Element, p. 3.) The public comment record before the Commission of Fine Arts on this proposal reflects near-unanimous opposition from the citizens of Washington and the surrounding region. That record is part of the administrative history of this proposal and the Commission should weigh it accordingly — not as a popularity contest, but as evidence that the broad acceptance the Plan identifies as fundamental to legitimate historic preservation decisions has not been achieved.

Principle 3 of the Comprehensive Plan calls on NCPC to coordinate federal plans with local jurisdictions and community groups, and to provide for public participation in the review of federal policies, plans, and programs. (Comprehensive Plan Introduction, p. 10.) The Harrison Design submission contains no evidence of coordination with the District of Columbia government, Arlington County, or the community organizations most directly affected by this proposal. A permanent 250-foot structure at the ceremonial gateway between the District and Virginia — a structure that would alter the character of the National Mall's primary western vista, the approach to Arlington National Cemetery, and the setting of three National Historic Landmarks — is precisely the kind of federal action the coordination obligation was designed to govern.

The Comprehensive Plan is explicit that this coordination must continue "in order to manage the capital's growth and development." It further recognizes that "factors such as the establishment

of Home Rule in Washington ... and greater citizen involvement have contributed to increased coordination among federal and local governments.” (Historic Preservation Element, p. 3.) Advancing this proposal without that coordination — over the demonstrated opposition of the affected public — would reverse the direction the Plan calls for.

A Note on Prior Review

The Comprehensive Plan states that Washington “must reflect the highest standards of architecture, urban design, and planning” and that the Federal Elements “emphasize fundamental concepts of beauty and order.” (Comprehensive Plan Introduction, p. 8.) The Historic Preservation Element states that “federal agencies working in concert with local officials and interested citizens must be careful stewards of the historic properties under their care or affected by their decisions” — and identifies NCPC as “one of several public forums where planning and historic preservation consultation can occur.” (Historic Preservation Element, p. 6.) That stewardship obligation is not discharged by a prior review process that lacked institutional independence.

The Commission of Fine Arts, which voted unanimously to advance this concept, was reconstituted in its entirety by the project’s sponsor between October 2025 and the date of that vote. All six sitting members were dismissed mid-term and replaced with new presidential appointees before the arch proposal came forward. The CFA’s advancement of the concept therefore cannot be treated as independent design validation in the ordinary sense. The institutional independence that gives CFA advancement its evidentiary weight in NCPC’s review process was absent.

This is not an argument about the aesthetic judgments of individual CFA members. It is an observation about process: NCPC’s review is the first genuinely independent evaluation of whether this proposal reflects the beauty and order the Plan calls for and whether it meets the stewardship standard the Plan demands. The Commission should weigh it accordingly.

Conclusion

Washington’s monumental core is not valuable because every available space contains a monument. It is valuable because generations of planners understood that open vistas, ceremonial approaches, and carefully composed civic relationships are themselves part of the monument.

The Comprehensive Plan emphasizes fundamental concepts of beauty and order — not as a judgment about any single structure, but as a standard for the composition of the city as a whole. The Commission should evaluate this proposal not as an isolated object but as an intervention in one of the nation’s most important civic landscapes. Measured against the Commission’s own adopted policies — twelve of which directly call for its rejection — the proposal is inconsistent with the principles of viewshed protection, historic continuity, ceremonial integrity, commemorative scale, and commemorative purpose that the Comprehensive Plan is designed to protect. It also lacks the congressional authorization the Commemorative Works Act requires and the coordination with local government and citizens the Plan calls for.

The question is not whether the arch is grand.

The question is whether it belongs where it is proposed.

It does not.

Comments by: Kevin Wheeler
Project Name: The Monumental Arch

Members of the Planning Commission, I ask you to please oppose the design, scale and location of the Monumental Arch.

It is aesthetically unbalanced for the site. The arch's scale is wrong and too large, dwarfing the surrounding sites and blocking existing views. The domineering design and excessive ornamentation lack any of the virtues of DC's architecture that define its understated beauty. The proposed arch would ruin the beautiful, simple, and elegant views from the Lincoln Memorial to the hallowed ground of Arlington Cemetery. It is with good reason that Veterans are suing to stop the Arch.

I ask that the record include a link to Phillip Kennicott's March 23, 2026, Washington Post column entitled, "Trump is the biggest threat to D.C.'s architectural splendor since War of 1812," <https://www.washingtonpost.com/style/2026/03/23/trump-washington-architecture-ballroom-arch/>

Kennicott, the Post's Pulitzer Prize-winning art and architecture critic, provides an informative overview of how D.C.'s beautiful urban plan and architecture was developed, and why the Monumental Arch's design and location fails.

As laid out in Kennicott's column, in 1806, Benjamin Latrobe, "perhaps the first great architect in America," wrote a letter to Congress. "In it, he articulated foundational principles for the aesthetics and architecture of the new republic, which recognized no kings, and no absolute authority beyond the laws and the Constitution."

"Nothing appears so clear," wrote Latrobe, "as that a graceful and refined simplicity is the highest achievement of taste and art." American buildings should be "chaste and simple," and to ornament them just for the sake of surface attraction was folly. "We find ornaments increase in proportion as art declines, or as ignorance abounds."

The Monumental Arch's enormous scale of 250 feet would dwarf the elegant 99 foot Lincoln Memorial, blocking a picturesque view of Arlington Cemetery. The mile of open space between these two American historical and architectural treasures is part of what makes it beautiful.

It's hard not to walk, bike, or drive across the Memorial Bridge or, to stand at Arlington Cemetery or the Lincoln Memorial and look across the bridge, and not have a visceral reaction to the beautiful views. It never gets old. Why ruin that?

There are at least 1,000 reasons to oppose the Monumental Arch: As of April 16, 2026, the Commission of Fine Arts received 1,000 comments, of which 999 were opposed and one was offering an alternative design.

Further, under the Commemorative Works Act, new congressional authorization is legally required to build the structure on protected federal land.

I recently saw an old Meet the Press clip of former Texas Senator Lloyd Bentsen. He said he asked himself three questions when assessing the merits of an issue: Does it work? Do we need it? Can we afford it?

If we were to apply that test to the Monumental Arch, the Arch should not be approved, neither by the Commission nor the Congress: No, the Arch's design and location don't work. No, we don't need the arch. No, we can't afford the hundred or hundreds of millions in construction. We can't afford the maintenance in the years to come, especially at the expense of existing parks and monuments that are already neglected.

The public is against this Arch. The scale and design don't work. It does not have Congressional consent and therefore it is against the law to move forward with the arch. Please do not approve the Monumental Arch.

Thank you for the opportunity to comment.

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Adrian Liaw Testimony

Subject: Opposition to Proposed Arch Project

I respectfully urge the National Capital Planning Commission to reject the proposed arch project.

While the project may be intended as a landmark feature, I believe it does not adequately serve the long-term planning, historic preservation, and public-space objectives that should guide development within the National Capital Region.

First, the proposed arch risks altering the visual character and historic integrity of the surrounding area. Washington, D.C.'s monumental core is internationally recognized for its carefully planned sightlines, open vistas, and balanced relationship between monuments, public spaces, and civic architecture. Introducing a large new vertical structure could detract from these established planning principles and create visual competition with existing nationally significant landmarks.

Second, the project appears to provide limited public benefit relative to its scale and cost. Federal resources and public space should be directed toward projects that improve accessibility, transportation, safety, maintenance of existing infrastructure, and enhancement of public use. The proposed arch does not clearly demonstrate sufficient public value to justify its footprint, construction impacts, and long-term maintenance obligations.

Third, the project may introduce unnecessary environmental and operational impacts, including construction disruption, increased maintenance requirements, and potential effects on surrounding public spaces. Before approving a permanent structure of this magnitude, the Commission should carefully evaluate whether less intrusive alternatives could achieve the same objectives.

Finally, once constructed, such a prominent structure would permanently alter the character of the area. Decisions affecting the nation's capital should be guided by restraint, respect for existing historic resources, and a demonstrated need that outweighs the potential negative consequences.

For these reasons, I respectfully request that the Commission deny approval of the proposed arch project and instead prioritize alternatives that better preserve the historic, visual, and civic character of the National Capital Region.

Thank you for your consideration.