



June 15, 2026

**FROM:** The Committee of 100 on the Federal City  
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**TO:** Jennifer Madello, Superintendent, George Washington Memorial Parkway, NPS  
Tammy Stidham, Associate Regional Director, Lands & Planning, NPS

**CC:** David Maloney, State Historic Preservation Officer, District of Columbia

**SUBJECT:** Triumphal Arch - Section 106 Assessment of Effect and Draft Programmatic Agreement  
(ID: 136973)

In response to the public notice posted on June 5, 2026, the Committee of 100 on the Federal City (Committee of 100) respectfully submits the following comments to the National Park Service regarding the proposal to construct a large, monumental arch in Memorial Circle (the Proposal) , at the west end of Memorial Bridge, as described in the materials posted on the National Park Service (NPS) web site.

First, from a procedural standpoint:

1. We reiterate our request (to Ms. Stidham, dated June 8, 2026) that the Committee of 100 be permitted to participate as a consulting party for the Section 106 consultations on the Arch Proposal initiated by the National Park Service.
2. We respectfully urge the National Park Service to provide the public with a more meaningful opportunity to provide comments to the National Park Service regarding the Proposal. It is deeply concerning that NPS has provided the public only 10 days (four of which are weekend days) to provide comments regarding a proposal of this magnitude and significant adverse impact on critical cultural landscapes within the Nation's Capital. We ask NPS to extend the public comment period for at least 30 days.
3. Given the limited opportunity for the public to provide comments to NPS, we ask that NPS give due consideration to the extensive record of public comments provided to the National Capital Planning Commission on the Proposal, which are posted on the NCPC's web site (<https://www.ncpc.gov>).
4. We urge NPS to defer finalizing any plans regarding the Project until proper authorization for the Project has been obtained from Congress, in order to ensure compliance with the Commemorative Works Act (40 U.S.C. §§ 8901–8909); and the Height of Buildings Act (Pub. L. 61-196, 36 Stat. 452 (1910), as amended, Pub. L. 113-103, 128 Stat. 1152 (May 16, 2014)) and 40 U.S.C. § 8106.

Second, from a substantive standpoint:

1. We agree with the NPS's determination in the Assessment of Effects Report (AOE) that the Project would adversely affect historic properties meeting the criteria found in 36 CFR § 800.5(a)(1) within the Area of Potential Effects because it would alter, directly and indirectly, characteristics of those properties that qualify them for inclusion in the National Register of Historic Places.

We similarly agree that the Project would have adverse effects meeting the criteria of 36 CFR § 800.5(a)(1) that change the integrity of setting, design, feeling, association, and, in some instances, location by introducing visual, spatial, and physical changes that affect character-defining views, reciprocal vistas, circulation patterns, and designed landscape relationships.

**We believe those adverse effects are extremely significant and damaging to the cultural landscapes that help to define the character of the Nation's Capital. To be more specific, we ask that you consider our comments to the National Capital Planning Commission (appended below).**

2. **We strongly disagree with the NPS's discussion of avoidance, minimization, and mitigation options as described in the AOE, which fail to consider either a no-build option, or any reasonable alternative location and/or design.**

**The failure to consider a no-build option and the NPS's apparent prior decision that the current planned location at Memorial Circle is the *only* option available to the agency was made, to our knowledge, without any consideration of (or opportunity for public comment regarding) the adverse potential impacts of that decision on historic properties under the National Historic Preservation Act, or on the cultural and historic aspects of the human environment under the National Environmental Policy Act, treating that decision as final (as the AOE does) effectively forecloses any meaningful opportunity to address those impacts.**

**We urge NPS to reopen and reconsider this decision, and to initiate a public review process that allows serious consideration of alternatives and options that would eliminate or minimize the obvious adverse impacts of the current Proposal.**

Thank you for considering the comments of the Committee of 100 on the Federal City.

Sincerely,  
*Judy Chessser*  
Judy Chessser, Chair

*Founded more than a century ago, the Committee of 100 on the Federal City is a nonprofit organization dedicated to safeguarding and advancing Washington's historic distinction, natural beauty, and overall livability. The Committee's work recognizes the critical value of public planning, informed by traditions that originate from the L'Enfant Plan and the McMillan Commission, continuing to the current day.*

## Appendix

### **Committee of 100 Comments to the National Capital Planning Commission, filed June 2, 2026, regarding the Adverse Impacts of the Proposal:**

#### **The Proposal would adversely impact spatial relationships established under the McMillan Plan, and the primacy of the Lincoln Memorial as the western terminus of the National Mall**

The *Report of the Senate Park Commission* (1902) (better known as the McMillan Plan) re-envisioned the Mall as a unified composition defined by long, uninterrupted perspectives and a clear hierarchy of elements. The Commission emphasized that “[t]he Mall should be treated as one broad, open, and continuous public ground.” (McMillan Plan, p. 25.) The McMillan Plan establishes a dominant east–west axis culminating in a major memorial at the western end, the then-proposed Lincoln Memorial. (McMillan Plan, p. 51-52 and accompanying plates).

The siting of the Lincoln Memorial at that location was not incidental; it implemented the Commission’s intent that the western terminus of the Mall be occupied by a single, commanding architectural focus aligned with the Capitol. (Id. See also National Park Service, *National Mall Cultural Landscape Report* (2010), ch. 2 (describing implementation of the McMillan Plan).) It is telling that the McMillan Plan intentionally compares the proposed Lincoln Memorial to the *Arc de Triomphe* in Paris:

At the [western end of the Mall], a great *rond pointe*, placed on the main axis of the Capital and the [Washington] Monument, becomes a gate of approach to the park system of the District of Columbia. Centering upon it as a great point of reunion are the drives leading southeast to Potomac Park and northwest by the Riverside Drive to the Rock Creek system of parks from this elevation of 40 feet. The Memorial Bridge leads across the Potomac directly to the base of the hill crowned by the mansion house of Arlington. Crowning the *rond pointe* as the *Arc de Triomphe* crowns the *Place de l’Étoile* at Paris, should stand a memorial erected to the memory of that one man in our history as a nation who is worthy to be named with George Washington - Abraham Lincoln. . . . Whatever may be the exact form selected for the memorial to Lincoln, and type it should possess the quality of universality, and also it should have the character essentially distinct from that of any monument either now existing in the District or hereafter to be erected. (McMillan Plan, pp. 51-52)

Installing an actual triumphal arch in the viewshed of the Lincoln memoria—and, to be specific, one that would be more than half again as tall as the *Arc de Triomphe* and more than double the height of the Lincoln Memorial as built—would diminish the fundamental character of the Lincoln Memorial as envisioned in the McMillan Plan. A new arch would compete directly with the Lincoln Memorial for primacy, undermining the hierarchy established by the Plan. The Lincoln Memorial’s prominence derives from its isolation, proportional scale, and position at the terminus of a two-mile vista, rather than from sheer height alone. Introducing a massive vertical element into this composition would draw the eye away from the Lincoln Memorial, interrupting the intended visual progression along the axis of the Mall and minimizing the Lincoln Memorial by comparison, altering its perceived scale and authority.

We would also note that [NPCA’s] Executive Director’s Recommendations state that NCPA has consistently taken the position that the Height of Buildings Act applies to “all federal projects . . . consistent with Comprehensive Plan Policy UD.B.1.3, highlighting the focus on preserving

Washington's picturesque, horizontal character, and reinforcing the Height of Buildings Act." The Director continues by requesting that the applicant "provide, as part of the next submission, an analysis and justification for the project's height in light of the Height of Buildings Act." The Committee of 100 has been a strong supporter of the Height Act and believes it no less applicable to this proposal than to any other project in the District of Columbia.

### **The Proposal would adversely impact the cultural landscape The Lincoln Memorial and its Relationship to Arlington Cemetery**

The McMillan Plan also recognizes the Lincoln Memorial as the "starting point" for a "concourse" connecting the National Mall, the then-planned Potomac Park on the Virginia side of the Potomac, and Arlington Cemetery. The Plan makes clear that this connection carries both spatial and symbolic meaning. (See generally McMillan Plan, pp. 55-59). The McMillan Plan emphasized the desirability of "broader and simpler" treatment for the Memorial Bridge, recommending "the removal of [central ornamental towers envisioned under a previous plan], which could conflict with the proposed Lincoln Memorial." (Id. pp. 57-58.) Those towers were considered by no less an authority than Frederick Law Olmsted, Jr.—the last surviving member of the McMillan Commission—as "so large and elaborate as to compete with the Lincoln Memorial... Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the plan of which it forms a part." See *Letter from Frederick Law Olmsted, Jr. to Newton D. Baker*, April 4, 1916 (National Archives, Olmsted Assocs. Records). They were eliminated.

In the same way, the massive proposed triumphal arch, as currently planned, would disrupt the low-scale concourse and open viewshed between the Lincoln Memorial and Arlington Cemetery as envisioned by the McMillan Commission, which was eventually followed through in the design and construction of the Arlington Memorial Bridge.

The McMillan Plan similarly emphasized a "broader and simpler" treatment for the "reservations" on the west side of the Memorial Bridge, between "the Potomac Park and the Arlington Estate." (McMillan Plan at p. 58). The plan notes the visual power of simple monuments to the dead and warns against larger monuments that detract from the "simplicity and uniformity of the whole," stating that

In particular, the noble slopes toward the river should be vigorously protected against the invasion of monuments which utterly annihilate the sense of beauty and repose. This is one of the most beautiful spots in the vicinity of Washington; it should not be defaced or touched in any way. . . . (McMillan Plan, p. 59.)

While the members of the McMillan Commission were referring to large monuments constructed as funerary memorials, the proposed construction of a massive triumphal arch of the immense size and scale as currently proposed—in the location currently proposed between the Memorial Bridge and Arlington Cemetery—would similarly violate that intention.

In summary, a new arch of overwhelming height and scale at the location proposed in the concept plan presented to the NCPC would:

- Displace the Lincoln Memorial as the dominant western focal point of the National Mall;
- Alter the perceived scale and importance of the memorial;
- Interrupt the visual, symbolic, and intentionally low-scale "concourse" between the Lincoln Memorial and Arlington National Cemetery; and
- Undermine the integrity of the McMillan Plan as a coherent composition.