



June 16, 2026

Ms. Jessica Bowron, Acting Director  
National Park Service  
1849 C Street NW  
Washington, DC 20240

Dear Acting Director Bowron:

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

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

The "precedent" images shown by the architect were never built and do not justify this current concept. A precedent is an earlier action, event, or decision that serves as a guide for similar situations. It acts as a benchmark; there are hundreds, if not thousands, of unrealized sketches for areas of Washington. Forcing a triumphal arch into this context ignores the capital's unique cultural landscape.

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

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

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

To retain a semblance of legitimacy for this process, the National Park Service should immediately grant consulting party status to the DC Preservation League and all other non-profit preservation organizations that have requested inclusion. NPS should reset the Section 106 process and begin the review of alternative sites, as has taken place for other major memorials or monuments.

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

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Miller". The signature is fluid and cursive, with the first name being more prominent than the last.

Rebecca Miller  
Executive Director