

The Committee of 100

on the Federal City



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September 16, 2026

By email: tammy_stidham@nps.gov

Ms. Tammy Stidham, Associate Regional Director
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Section 106 Consultation, Triumphal Arch – Assessment of Effects and Failure to Consider
Alternative Locations: Comments of the Committee of 100 on the Federal City

Dear Ms. Stidham:

On behalf of the Committee of 100 on the Federal City (“Committee of 100”), we write in response to your request to the Consulting Parties to provide written comments on the Revised Assessment of Effects Report (“Revised AOE Report”) on the proposed Triumphal Arch (the “Project”). The views stated below also reflect discussions at the Consulting Party meeting of September 9, 2026, in which representatives of the Committee of 100 participated.

A number of the participants in the September 9th meeting raised specific points regarding the properties affected by the Proposed Arch and the evaluation of impacts, which we support, but the undisputable conclusion remains the same: The Project as proposed would have significant adverse effects on historic properties within the Area of Potential Effects, and those impacts would seriously damage the cultural landscapes that help to define the character of the Nation’s Capital. The record on this point is abundantly clear.

It is also abundantly clear that those impacts could be greatly minimized and mitigated by relocating the project to an alternative site. Yet, you made clear in the September 9, 2026, meeting that the National Park Service considers the design and location of the Arch Proposal to be final. You stated: “For this project, we’re not considering alternative locations or changes in design.”

As we have stated previously, the NPS’s refusal to consider either (1) a no-build alternative, or (2) other locations with less damaging impacts forecloses the consideration of less harmful alternatives and violates the agency’s obligations under 36 CFR § 800.6(a) to “develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties.” In our view, that refusal is based on a deeply flawed understanding of the authorities and the historic record cited as justification (in the NPS’s Revised AOE Report, and as confirmed by you during the September 9, 2026, meeting).

The NPS Rationale for Refusing to Consider Alternatives

According to the Revised AOE Report (p. 11), the NPS’s refusal to consider alternative locations is based on the premise that the proposed arch “completes a century-old civic design concept.” The Revised AOE Report states:

“The NPS did not evaluate alternative locations outside Memorial Circle because the proposed undertaking is grounded in the historic design intent for the Arlington Memorial Bridge and Memorial Avenue corridor. The location is not being treated as an interchangeable site for a new commemorative feature; rather, it is the specific location

identified in the historic planning framework for the bridge, Memorial Avenue, and Columbia Island/Memorial Circle. The 1924 Report of the Arlington Memorial Bridge Commission described a design concept that included monumental vertical elements at Columbia Island in connection with the bridge's western terminus and the ceremonial approach to Arlington National Cemetery. Those proposed columns were intended to frame, mark, and give architectural emphasis to the transition between Arlington Memorial Bridge, Memorial Circle, Memorial Avenue, and the entrance sequence to Arlington National Cemetery.

"Because the current undertaking is intended to respond to and complete that historically contemplated idea at Memorial Circle, the NPS focused its review on whether the proposed Arch, in this location, would affect historic properties and how those effects could be addressed. Locations elsewhere in Washington, D.C. or Virginia would represent a materially different undertaking because they would not implement or reference the 1924 Arlington Memorial." Revised AEO Report at 10-11 (emphasis added); see also Revised AOE Report at 35.

Similarly, during the September 9th Consulting Party meeting, you made clear that the NPS has made a final decision to implement the Arch Proposal as currently designed and at the current proposed location, and that NPS would not consider design changes or alternative locations. You explained the NPS's rationale for this decision as follows:

"The basis for the location of this particular arch is due to what is enacted in the 1925 Arlington Memorial Bridge Act, which specifies the specific location along with vertical elements to which a different location would not fulfill the same purpose as the act requirement for the arch. We looked at design changes, and over the years, elliptical plazas, cross-axis monumental pavilions, and two columns had been presented over many years that were never realized. It was determined that the current design best meets the project purpose and need and fulfills the intentions of the Arlington Memorial Bridge Commission Report from 1924 and the Act of 1925. The determination was made that no reasonable avoidance alternative exists."

<https://www.nps.gov/media/video/view.htm?id=D72EFC1E-63E0-4D5E-9DDC-4CC28B53ED2B>

In response to questions by the Consulting Parties as to how a massive arch could be seen as "completing" a proposal for two slender columns, you replied, "In our view, we are performing what was originally intended."

As discussed further below, it is our view that the NPS's assertion that the proposed arch is intended to "complete a historically contemplated commemorative feature at Memorial Circle" is not supported by the record.

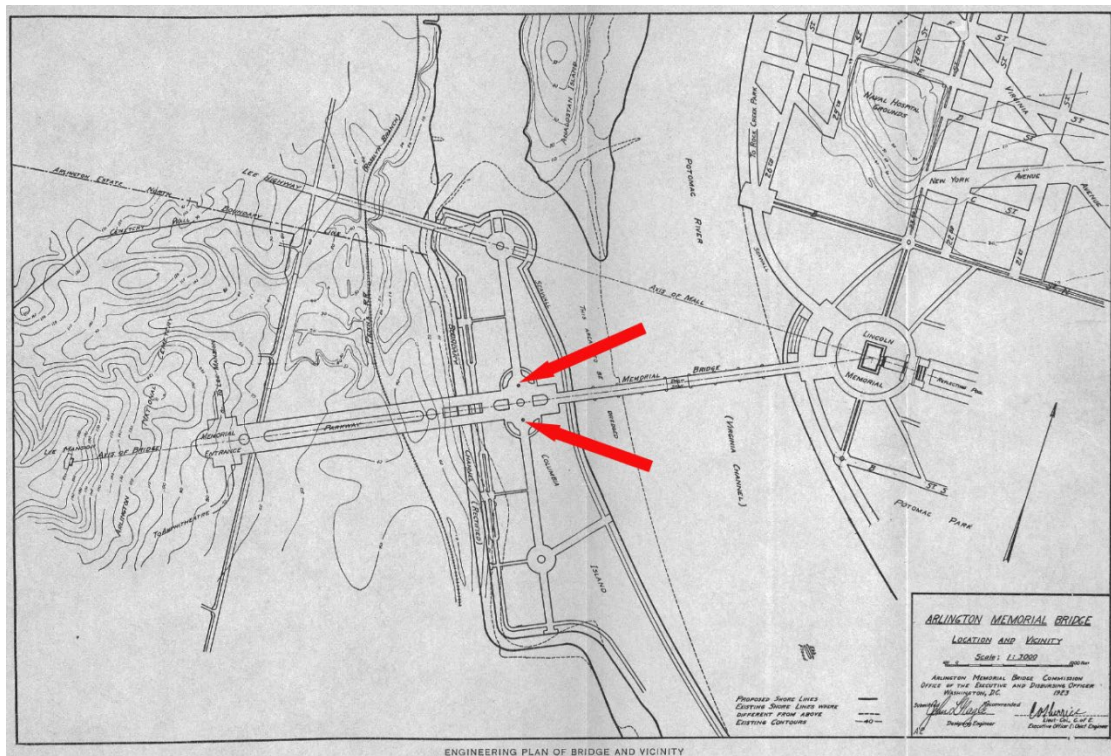
The Historical Record: What the Bridge Commission Actually Proposed in 1924

The *entire* discussion of the design concept for Columbia Island in the Report of the Arlington Memorial Bridge Commission (Senate Doc. No. 95, 68th Cong., 1st Sess., 1924) ("1924 Commission Report") is as follows:

"Even before the reclamation of Columbia Island by the dredging operations of the Corps of Engineers had advanced materially it was always considered as a suitable site for formal

park treatment, a fitting end for the Memorial Bridge, as well as an important feature in itself. Being so intimately related to the bridge, it was thought proper that the plans for the ultimate development of Columbia Island as a park should be included as part of the project for the Memorial Bridge. Accordingly, the lines of the shore of the island have been somewhat rectified to permit a cross axis almost perpendicular to the main axis of the bridge and extending the full length of the island. The intersection of these two axes has suggested a plaza with fitting architectural adornment *in a measure supplemental to the Lincoln Memorial across the river, and for this purpose two stately columns are proposed to be erected here, framing in but not interfering with the view of the Lincoln Memorial from the direction of the Lee Mansion*. These columns symbolize the one the North and the other the South. They are surmounted by statues of Victory, the stylobates whence they rise offering surfaces suitable for decorations, bas-relief, and inscriptions. The columns are 166 feet high, or practically of the same height as the Calonne de Juillet in Paris.” 1924 Commission Report, at 9, 40-41 (emphasis added).

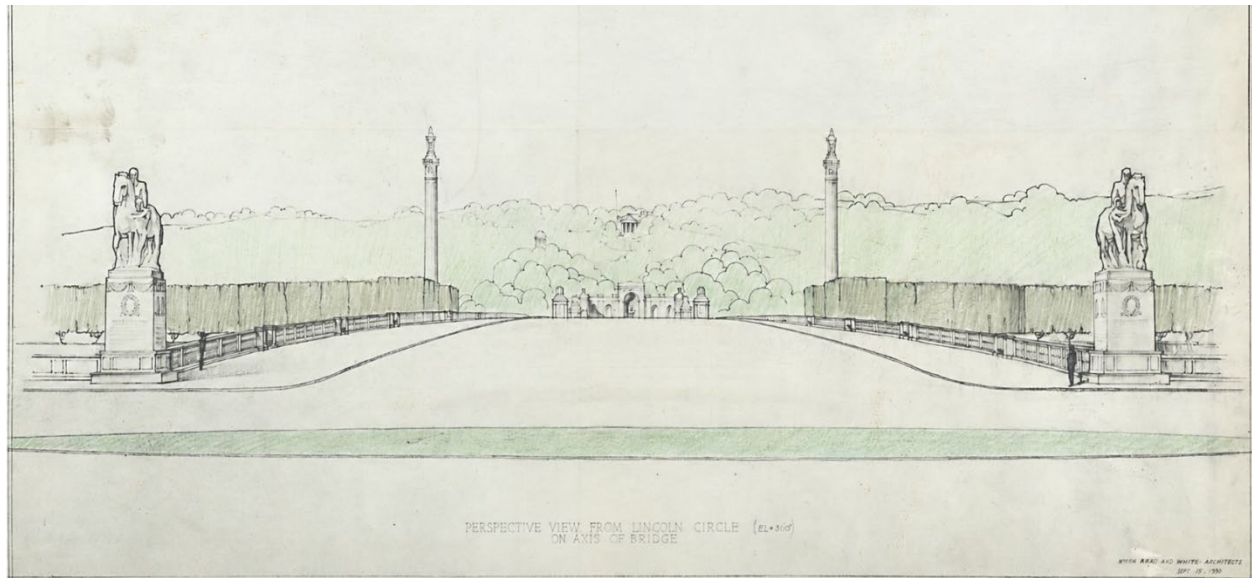
Scaled drawings accompanying the text (in plates in the 1924 report) place the two columns at approximately 300 feet apart, with diameters of less than 15 feet above the column base:



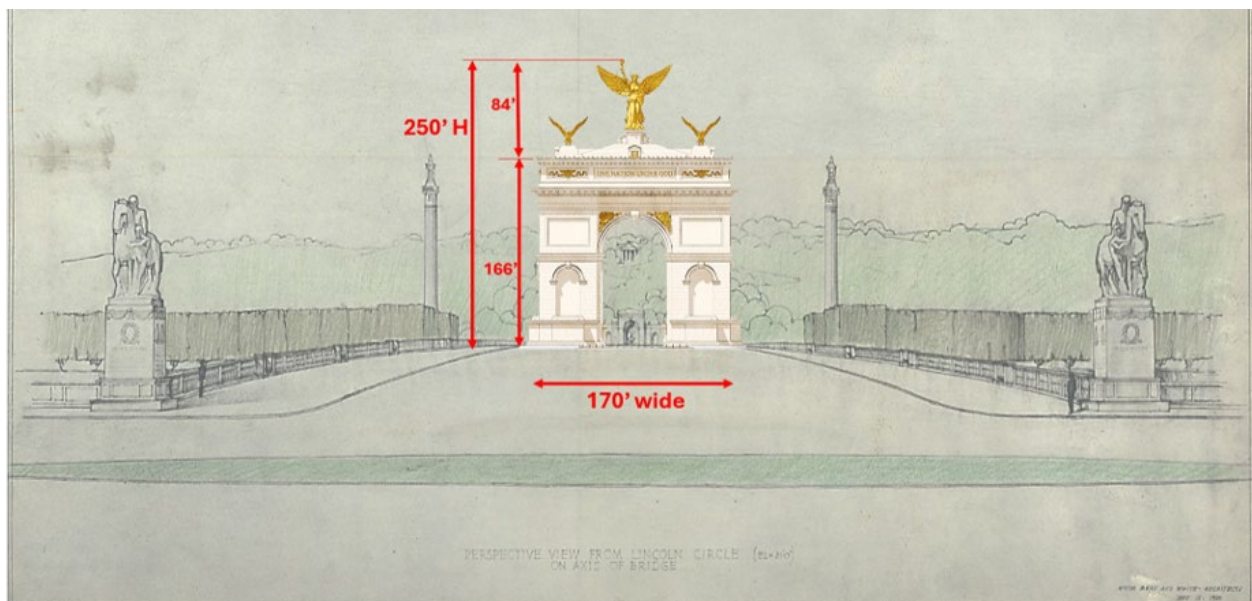
Source: 1924 Bridge Commission Report, p. 52, columns indicated with red arrows.

The distance between the columns, and their slender design, were intentional: The specific language of the 1924 Commission report makes clear that the additional architectural elements contemplated for the center of Columbia Island, i.e. the two columns, were to be (1) “supplemental” to the Lincoln Memorial, and (2) “not interfering” with the view of the Lincoln Memorial from Lee Mansion, at the heart of Arlington Memorial Cemetery. Two narrow columns 300 feet apart would have met these key 1924 design criteria; a massive triumphal arch would not.

A nearly contemporaneous rendering of a view across the proposed Memorial Bridge showing the two columns, by McKim, Mead and White, shows how open the viewshed would remain towards Arlington Memorial Cemetery.



The same view with the proposed Triumphal Arch superimposed makes clear that the proposal not only would not “complete” the 1924 design, but it is also plainly incompatible with it:



(Illustrations: *McKim, Mead & White, Architectural Records, PR42*, Department of Prints, Photographs, and Architectural Collections, New York Historical Society; Annotations by David Scott Parker, David Scott Parker Architects.)

It is impossible to reconcile these illustrations with the NPS’s determination that a massive triumphal arch—more than twice the height of the Lincoln Memorial and significantly blocking views between that memorial and the Arlington Memorial Cemetery—would somehow “complete a

historically contemplated commemorative feature at Memorial Circle.” In terms of size, scale, massing, and design, the proposed arch is not in any way comparable to the unbuilt columns contemplated in the 1924 design proposal; moreover, it would blatantly violate the two 1924 design criteria fundamental to the intended design of that unbuilt commemorative feature.¹

It is the view of the Committee of 100 that the NPS’s assertion that it is “completing” the earlier design concept—with a different design that violates the key stated criteria on which the original concept was based—is neither a factual nor a reasonable basis to refuse to consider less harmful alternatives as required by 36 CFR § 800.6(a).

The Historical Record (Cont’d): What Congress Actually Approved in 1925

The NPS’s position appears to be that, because the 1924 design proposal by the Arlington Memorial Bridge Commission was approved by Congress in legislation in 1925, and because commemorative additions were part of that design (notwithstanding the obvious differences between two narrow columns and a massive triumphal arch), the NPS proposal is simply implementing the stated intention of the Congress. A closer review of the 1925 statute reveals that Congress’s approval was more open-ended than NPS suggests, and deferred to the Commission to approve the final design of the bridge and its environs. The Commission’s final design did not include either the two columns, or a massive arch.

The 1924 Commission Report included draft legislation that expressly assumed that the design concepts included in the report were not intended to be final. Specifically, the recommended legislation would have authorized the construction of the bridge “in accordance with the design, surveys, and estimates of cost” recommended in the 1924 Commission Report, except that the Commission would be expressly authorized to “make such changes in design and location of said bridge without increasing the cost of the project as in its discretion may be found to be necessary or advisable.” (1924 Commission Report, at 16.) This language was, in fact, included in the final legislation approving the project. Pub. L. No. 68-463 § 1, 43 Stat. 974 (1925). This makes clear that the final design of the project was not actually set by Congress, but left to the discretion of the Commission.

And indeed, the Commission made numerous changes to the design of the bridge project—including the Columbia Island portion—before the project was eventually constructed. A number of individuals and organizations expressed concern about the columns, both because of their height and proximity to the nearby Hoover Airport but also from a design standpoint.²

¹ It is also worth noting that the 1924 design principles echoed the earlier history of planning for the memorial bridge project. Earlier designs including large arches and ornamental towers were expressly rejected. See The Cultural Landscape Foundation, [A Slap in the Face of the Lincoln Memorial](#), May 17, 2026, quoting Frederick Law Olmsted, Jr.: “These towers are the most conspicuous feature of the design and are so large and elaborate as to compete with the Lincoln Memorial not only in an artistic sense but in point of cost. To eliminate them from the design would involve its complete restudy as an artistic problem. Not to eliminate them would be like a slap in the face to the Lincoln Memorial and to the [McMillan] plan of which it forms a part.”

² For example, Adolph A. Weinman, a member of the Commission of Fine Arts, “came to the conclusion that it might be better not to erect the columns, that they will be too massive, and as to height, might seem like two smokestacks standing there, and furthermore would be in conflict with the view of the pylons of the

Consequently, in December 1931, the Arlington Bridge Commission disapproved the proposed columns and they were eliminated from the design. Sue Kohler, *The Commission of Fine Arts: A Brief History, 1910-1995* at 26 (Commission of Fine Arts 1996).

The Commission's decision, supported by the Commission of Fine Arts, to eliminate the columns and other commemorative structures on Columbia Island cannot be seen as somehow failing to implement a design intended by Congress (or, as NPS suggests, to "complete" a Congressionally approved design); under the authority delegated by Congress, the Commission's decision to eliminate the columns superseded the 1924 design. NPS's proposal to change the commemorative landscape of Columbia Island more than a century later, with a new design that violates the key stated design criteria for the 1924 proposal, and which ignores the fact that the 1924 design was ultimately changed by the Commission under authority delegated by Congress, flies in the face of the original 1924 concept, the plain language of the statute, and the history of the Commission's actions. While the National Park Service clearly is entitled to propose a new design, it is not entitled to implement that design without complying with the various statutes mandating express Congressional approval, including the Commemorative Works Act, 40 U.S.C. §§ 8901–8909, the Height of Buildings Act, Pub. L. No. 61–196, 36 Stat. 452, and 40 U.S.C. §8106.

* * * * *

For the reasons stated above, it is the view of the Committee of 100 on the Federal City that the NPS's refusal to consider alternative locations or a no-build alternative under this unsupported rationale is inconsistent with the requirements of the agency's obligations under 36 CFR § 800.6(a). We again urge NPS to halt further consideration of the Arch Proposal unless and until the project is expressly authorized by Congress, or unless the project is redesigned at a location and configuration that is consistent with the authority granted to the National Park Service.

Sincerely,

Judy Chesser

Judy Chesser
Chair

Paul Edmondson

Paul W. Edmondson
Member, Historic Preservation Subcommittee

cc:

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Consulting Parties

Arlington Memorial Bridge, the Lincoln Memorial, and. the Washington Monument." Minutes of the Commission of Fine Arts, July 1, 1931, at 4.