Re: CFA 21/MAY/26-1
Memorial Circle, George Washington Memorial Parkway, Washington, DC.
New Monumental Arch. Revised Concept.

Good morning, I'm Elizabeth Merritt, Deputy General Counsel at the National Trust for Historic Preservation.

After reviewing the revised concept plans that have been submitted for the proposed Triumphal Arch, the National Trust remains extremely concerned about the location, height, scale, and design of the proposed Arch. The Commemorative Works Act requires that works such as the proposed Triumphal Arch must be sited at a location that "does not interfere with, or encroach on, an existing commemorative work," and "to the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources." [40 U.S.C. § 8905(b)(2)]. We believe these criteria in the Commemorative Works Act call for the Commission to reject the proposed location and design for the Arch. In addition, the Commemorative works Act specifically requires the project to be authorized by Congress. [*Id.* § 8903]

This Commission, at last month's meeting, had several useful comments and recommendations in response to the initial concept presentation. Notwithstanding those recommendations, the modifications to the proposal since the April meeting have been minimal. Most notably, the 68-foot-high sculpture at the top of the proposed Arch has not been removed or reduced, contrary to the Commissioners' recommendation.

The location of the proposed Arch, at Memorial Circle, would interrupt the highly significant relationship between the Lincoln Memorial, across Arlington Memorial Bridge, and Arlington National Cemetery and Arlington House. This vista is one of the most symbolic landscape vistas in Washington, DC, and was designed to represent the post-Civil War reconciliation between the northern states and the southern states. Arlington Memorial Bridge was intentionally designed with a low profile to respect the visual and symbolic vistas connecting the National Mall and Arlington National Cemetery. If built as planned at the proposed location, the new Triumphal Arch would obscure these very deliberate relationships between the Lincoln Memorial, Arlington Memorial Bridge, and Arlington House.

The National Trust is also deeply concerned about the unprecedented height and scale of the proposed Triumphal Arch, which would overwhelm the Lincoln Memorial, Arlington National Cemetery, and Arlington House. The proposed Arch would especially diminish and disrupt the iconic and powerful presence of the beloved Lincoln Memorial.

The proposed location of the Arch is <u>also</u> inconsistent with the solemn historic character of Arlington National Cemetery. As the hallowed resting place of 400,000 veterans and their families, Arlington National Cemetery is a powerful reminder of American military sacrifice, and national unity, all within sight of the monumental core of the Nation's Capital. Distinguished by its rolling hillsides with uniform rows of solemn graves lined with powerful, unadorned headstones, Arlington National Cemetery is a living memorial that

hosts hundreds of funeral services every month. The Arch, as proposed, would dominate the National Cemetery, and would be inconsistent with its solemn and hallowed character.

Finally, it's important to note that review of the proposal under Section 106 of the National Historic Preservation Act has not yet been initiated. We understand that the National Park Service will be initiating Section 106 consultation soon, but the statute mandates that the review process must be completed "prior to" approval of the project. The whole purpose of Section 106 is to develop and evaluate alternatives, and modifications to the project, that would avoid and minimize its adverse effects. In addition, based on our experience with Section 106 consultation in the National Capitol region, we anticipate that the proposed plans could well be substantially modified in response to the collaborative review process and comments from the expert professional staff with the involved agencies. We urge the Commission members to defer any decision in order to be informed by the results of the Section 106 process.

Thank you for considering these comments from the National Trust for Historic Preservation.