



National Trust *for*
Historic Preservation®

April 15, 2026

Mr. Rodney Mims Cook, Jr.
Chair
U.S. Commission of Fine Arts
401 F Street, NW, Suite 312
Washington, DC 20001

Re: CFA 16/APR/26-1 Memorial Circle, George Washington Memorial
Parkway, Columbia Island, Washington, DC. New monumental arch.
Concept. April 15, 2026

Dear Mr. Cook:

The National Trust for Historic Preservation in the United States (“National Trust”) is a private charitable, educational, nonprofit corporation headquartered in Washington, D.C. and chartered by Congress in 1949 to further the historic preservation policy of the United States. 54 U.S.C. § 312102(a). This Congressional charter obligates the National Trust to “facilitate public participation in the preservation of sites, buildings, and objects of national significance or interest.”

We respectfully submit the following comments concerning the current proposal by the U.S. Department of the Interior to construct a new Triumphal Arch at Memorial Circle, George Washington Memorial Parkway. We urge the U.S. Commission of Fine Arts (CFA) to consider these comments in connection with its responsibility to (1) advise on the plans and merits of the designs of public buildings to be erected in the District of Columbia by the federal government, and (2) advise on the merits, location, and design of statues, fountains, and monuments to be erected in the public squares, streets, and parks in the District of Columbia under the authority of the federal government; (3) review, advise, consult, and approve in accordance with the duties of CFA provided for in the Commemorative Works Act.

After our initial review of the information available to the public, the National Trust is concerned about the location, scale, and design of the proposed

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Triumphal Arch. The location of the proposed Triumphal Arch, at Memorial Circle, will interrupt the highly significant relationship between the Lincoln Memorial, across Arlington Memorial Bridge, to Arlington National Cemetery and Arlington House. One of the most symbolic landscape vistas in Washington, DC, the vista was designed to represent the post-Civil War reconciliation of the north and south of the United States. Arlington Memorial Bridge was intentionally designed with a low profile to respect the visual and symbolic vistas connecting the National Mall and National Cemetery. If constructed as planned at the proposed location, the new Triumphal Arch will obscure the intentional axial and aesthetic relationships between the Lincoln Memorial, Arlington Memorial Bridge, and Arlington House.

The National Trust is also deeply concerned about the overwhelming height and scale of the proposed Triumphal Arch, which will overwhelm the Lincoln Memorial, Arlington National Cemetery, and Arlington House. While some element may be appropriate at this location, the planned Triumphal Arch is double the size of the Lincoln Memorial and will risk diminishing the preeminent importance of this powerful and beloved monument. As such, the Triumphal Arch is inconsistent with the McMillan Plan and subsequent planning decisions that have stewarded the National Mall as a unified composition characterized by long, open, and uninterrupted viewsheds, with a clear hierarchy of monumental elements, that culminates at its western end at the Lincoln Memorial.

Finally, the location of the Arch, at the entrance to Arlington National Cemetery, is inconsistent with the solemn historic character of Arlington National Cemetery. The hallowed resting place of 400,000 veterans and their families, Arlington National Cemetery is a powerful reminder of American military sacrifice, selfless service, and national unity, all within sight of the monumental core of the Nation's Capital. Distinguished by the Tomb of the Unknowns, Memorial Avenue, and rolling hillsides of uniform rows of simple headstones, Arlington National Cemetery is a living memorial that honors thirty funeral services each day. The Arch, as proposed, will overwhelm Arlington National Cemetery, and be inconsistent with its simple historic character of solemn graves with simple white markers.

Thank you for considering the views of the National Trust for Historic Preservation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carol Quillen", with a stylized flourish at the end.

Carol Quillen
President and Chief Executive Officer
National Trust for Historic Preservation

CC: Jessica Bowron, Acting Director, National Park Service
Ed Forst, Administrator, General Services Administration
Turkiya Lowe, Acting Federal Preservation Officer, National Park Service

Thomas Luebke, FAIA, Secretary and Federal Preservation Officer,
Commission of Fine Arts
William Scharf, Chair, National Capital Planning Commission
Kristi Tunstall Williams, Federal Preservation Officer,
General Services Administration