



National Trust *for*
Historic Preservation®

May 20, 2026

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

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

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 Executive Office of the President and the U.S. Department of the Interior to construct a new Triumphal Arch at Memorial Circle on the George Washington Memorial Parkway. We urge the U.S. Commission of Fine Arts (“CFA”) to consider these comments in connection with its responsibility under the Commemorative Works Act, following consultation with the National Capital Memorial Advisory Commission, to approve site and design proposals for commemorative works so that such works do “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 would also remind the Commissioners that the Commemorative Works Act requires the project to be approved by Congress. *Id.* § 8903.

After reviewing the revised concept plans that have been submitted to CFA, the National Trust remains concerned about the location, height, scale, and design of the proposed Triumphal Arch, the manner in which it interferes with existing commemorative works and fails to protect existing public uses and cultural resources. Notwithstanding comments and recommendations by Commission members at the April 2026 meeting, the modifications to the proposal 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. In addition, the revised proposal does not appear to include secondary open archways within the legs of the central arch in order to make it more open, as recommended by the Commissioners.

The location of the proposed 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 unprecedented height and scale of the proposed Triumphal Arch, which will overwhelm the Lincoln Memorial, Arlington National Cemetery, and Arlington House. The proposed Arch would be double the size of the Lincoln Memorial and would risk disrespecting 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.

In addition, the proposed 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, would dominate Arlington National Cemetery, and be inconsistent with its hallowed character of solemn graves with powerful, unadorned white markers.

Finally, it is 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 be completed "prior to" approval of the project. 54 U.S.C. § 306108. In addition, based on past experience with Section 106 consultation in the National Capitol region, the proposed plans will be improved in response to the collaborative review and comments from the expert professional staff of the involved agencies, including the Commission's own staff. We urge the Commission members to defer any decision in order to be informed by the Section 106 process.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Carol C. Quillen", enclosed within a faint rectangular border.

Carol Quillen
President and Chief Executive Officer

cc: Thomas Luebke, FAIA, Secretary and Federal Preservation Officer, CFA
Jessica Bowron, Acting Director, National Park Service
Tammy Stidham, Associate Regional Director, Lands & Planning, NPS
Turkiya Lowe, Acting Federal Preservation Officer, National Park Service
William Scharf, Chair, National Capital Planning Commission