



September 29, 2026

Jaime Loichinger via email at jloichinger@achp.gov
Director, Office of Federal Agency Programs
Advisory Council on Historic Preservation

RE: Comments of The American Institute of Architects Pursuant to 36 C.F.R. § 800.7(c) Triumphal Arch Project at Memorial Circle, ACHP Case #025123

Dear Director Loichinger:

The American Institute of Architects (AIA) submits these comments in response to the Advisory Council on Historic Preservation's September 24, 2026, notice terminating consultation on the proposed Triumphal Arch Project at Memorial Circle. AIA appreciates the opportunity to provide its views as the Council develops its comments.

AIA represents more than 100,000 architects and design professionals committed to advancing the value of architecture and design in the United States. Our members plan, design, preserve, and adapt civic landscapes and public buildings across the nation, including in Washington, DC.

AIA urges the Council to advise the Secretary of the Interior that the proposed 250-foot triumphal arch must not proceed at Memorial Circle.

The Council's termination letter recognizes that the project would adversely affect historic properties, that those effects have generated substantial public concern, and that alternatives to avoid or minimize the effects are especially important because National Historic Landmarks are within the area of potential impact. It also reports NPS's view that alternatives would alter the project's fundamental nature and fail to achieve its goals. It is precisely when a proposal's stated objectives cannot be achieved without serious harm to nationally significant historic resources that the agency must reconsider the location, scope, and design of the undertaking.

Washington's monuments are not a collection of isolated objects. It is a deliberately composed civic landscape in which buildings, open spaces, views, movement corridors, topography, and memorial symbolism work together. The proposed arch must be evaluated accordingly. A 250-foot permanent arch at the central hinge of this landscape cannot coexist with the rest of the area's historic sequence, reciprocal views, civic meaning, and solemn function.

The relationship between the Lincoln Memorial and Arlington House is among the most important axes in the Nation's Capital. It was conceived as a physical and symbolic connection between Washington and Arlington: between the Lincoln Memorial and the former estate of Robert E. Lee; between the District and Virginia; and between the nation's past division and its aspiration toward reunion.

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Arlington Memorial Bridge and its approaches were designed to reinforce rather than dominate that relationship. The low, horizontal bridge allows the eye to move across the Potomac toward the Arlington hillside. Memorial Circle functions as a transition; it receives visitors arriving from Washington and directs them toward the cemetery and Arlington House. It is a point of movement and orientation, not an object intended to interrupt the corridor or compete with the landmarks that define it.

A 250-foot triumphal arch positioned in the center of that sequence would reverse the landscape's established logic. It would:

- Interrupt the reciprocal visual relationship between the Lincoln Memorial and Arlington House.
- Block, alter, or dominate historically significant views along Memorial Avenue, Arlington Memorial Bridge, and the adjacent landscape.
- Change Memorial Circle from a spatial hinge into the dominant visual event of the corridor.
- Overwhelm the scale and carefully calibrated horizontal character of the bridge, river crossing, road approaches, and cemetery threshold.
- Replace a landscape of reconciliation, remembrance, and open civic connection with a structure whose scale, centrality, and traditional symbolism convey triumph and conquest.

The project would also change the approach to Arlington National Cemetery, a national cemetery and place of remembrance where military families and the public gather for funerals, burial services, commemoration, mourning, and reflection.

The approach through Memorial Circle is part of the ceremonial transition into a setting defined by grief, service, sacrifice, and national memory. A monumental structure celebrating triumph at the cemetery's threshold is incompatible with the solemnity of that procession and the character of the adjoining historic landscape.

Section 106 requires an agency to develop and evaluate alternatives or modifications to an undertaking that could avoid, minimize, or mitigate adverse effects. When National Historic Landmarks are implicated, the federal agency is required by law to plan and undertake actions necessary to minimize harm to the maximum extent possible.

NPS has reportedly concluded that alternatives capable of avoiding or minimizing harm would alter the project's fundamental nature and prevent achievement of its goals. That conclusion appears to treat the project's existing siting and basic concept as fixed before the alternatives analysis begins.

A genuine alternatives analysis must ask whether a project of this kind should be located at Memorial Circle at all. It should evaluate:

- Alternative locations that do not interrupt the Lincoln Memorial–Arlington House axis or affect the cemetery’s historic setting.
- A no-build alternative at Memorial Circle.
- Lower-scale, less visually intrusive, or differently configured memorial approaches.
- Designs that preserve the established views, topography, hierarchy, and ceremonial experience of the historic landscape.
- Whether the objectives offered for the proposal can be achieved through a commemorative project that is compatible with the site’s significance, rather than one that displaces it.

The nation’s most important memorial landscapes were designed as enduring systems of architecture, landscape, movement, memory, and democratic civic space. Memorial Circle is a crucial part of a carefully composed and nationally significant landscape.

AIA asks ACHP to advise the Secretary of the Interior that the proposed Triumphal Arch cannot be reconciled with that landscape at Memorial Circle, and that the appropriate resolution is to select a different course.