

June 15, 2026

National Park Service
George Washington Memorial Parkway

RE: Section 106 Comments on the Proposed Triumphal Arch at Memorial Circle and Draft Programmatic Agreement

Dear National Park Service:

The American Society of Landscape Architects (ASLA) appreciates the opportunity to comment on the Assessment of Effects Report and Draft Programmatic Agreement for the proposed Triumphal Arch at Memorial Circle. Founded in 1899, ASLA represents more than 16,000 landscape architects nationwide.

ASLA strongly opposes the proposed Triumphal Arch at Memorial Circle because it would permanently alter the historic integrity of the Memorial Avenue Corridor and the broader monumental landscape of the National Capital Region. As documented in the Assessment of Effects Report, the National Park Service (NPS) concluded that the project would adversely affect numerous nationally significant historic resources and alter the viewsheds and landscape relationships that define them.

The National Historic Preservation Act requires federal agencies to consider and resolve adverse effects to historic properties. Section 110(f) further requires federal agencies to minimize harm to National Historic Landmarks to the maximum extent possible—a heightened stewardship responsibility that is particularly relevant given the nationally significant resources affected by the arch proposal.

NPS has determined that the proposed arch would adversely affect numerous nationally significant historic resources, including the Memorial Avenue Corridor Cultural Landscape, Arlington National Cemetery, Arlington Memorial Bridge, Arlington House, the Lincoln Memorial Cultural Landscape, and the National Mall Historic District. These places are significant cultural landscapes whose character is augmented by the broader spatial, visual, and symbolic relationships that connect them. The setting is key to how precious these places are.

From a landscape architecture perspective, viewsheds and spatial relationships are not merely aesthetic features; they are character-defining features of the historic landscape. The visual relationship between Arlington National Cemetery, Arlington Memorial Bridge, and the monumental core of Washington, D.C., is fundamental to the design, meaning, and visitor experience of the Memorial Avenue Corridor. Landscape architects understand that the most successful and enduring commemorative landscapes are often defined as much by what is preserved as by what is constructed. Preserving these viewsheds and landscape relationships is essential to maintaining the historic integrity, cultural meaning, and visitor experience of this

nationally significant cultural landscape. As NPS acknowledges, the proposed arch would alter these historic relationships and diminish the integrity of affected historic properties.

Several notable past proposals for monuments in Washington, D.C., were either scaled back or wisely left unbuilt. The Jefferson Memorial complex envisioned by Franklin D. Roosevelt (which rallied an opposition movement known as the “cherry tree rebellion”), the proposal for a Tidal Basin mega fountain as a memorial to Teddy Roosevelt, and the massive pyramid mausoleum for George Washington proposed by Benjamin Latrobe all would have had a huge impact. The correct decision for the NPS on the Section 106 review is to add this triumphal arch to the list of things not built.

ASLA is particularly concerned that the Draft Programmatic Agreement relies primarily on mitigation measures to address impacts that NPS has already determined to be adverse. While documentation, interpretation, design refinements, and landscape treatments may reduce certain impacts, they cannot replace the loss of historic viewsheds and landscape relationships once they are altered. As a result, the agreement does not adequately resolve the underlying impacts identified in the Assessment of Effects Report. Once these character-defining viewsheds and landscape relationships are altered, they cannot be fully restored through mitigation.

ASLA is also concerned that archaeological investigations remain ongoing. Both the Assessment of Effects Report and Draft Programmatic Agreement acknowledge the need for additional archaeological evaluation and future review of utility corridor impacts. Until these investigations are complete, the full extent of potential effects on archaeological resources cannot be fully understood.

For these reasons, ASLA respectfully urges NPS not to advance the proposed Triumphal Arch and to preserve the historic integrity of the Memorial Avenue Corridor, the Arlington National Cemetery viewshed, and the broader monumental landscape of the National Capital Region.

Thank you for the opportunity to comment.

Sincerely,

Torey Carter-Conneen

Chief Executive Officer

American Society of Landscape Architects