



June 26, 2026

Ms. Jennifer T. Nersesian, Regional Director  
National Capital Region  
National Park Service  
1100 Ohio Drive, SW  
Washington, DC 20024

RE: Section 106 Consultation for the Proposed Triumphal Arch in Memorial Circle

Dear Ms. Nersesian:

Thank you again for initiating Section 106 consultation this month on the proposed Triumphal Arch in Memorial Circle, and for holding the first consultation meeting on June 15, 2026. We provided our initial comments verbally at the meeting and in our letter of the same date. Thank you also for your letter of June 22, 2026, seeking clarification of our comments.

Let me first summarize the verbal comments we presented at the June 15 meeting. We were unable to submit those comments in writing due to the quick turn-around in your schedule but will take the opportunity to do so now. As stated in our letter of June 15, the triumphal arch would be the tallest and most visible monument constructed in the District since completion of the Washington Monument. Once complete, it would be the largest monumental arch in the world. In response to a question at the June 15 meeting, your project team characterized the triumphal arch as celebratory rather than memorial, yet its placement in Memorial Circle at the opposite end of Arlington Memorial Bridge from the Lincoln Memorial would make it an inseparable part of a memorial composition in the nation's capital commemorating the reunification of the nation after the Civil War. It would become the most prominent element of that memorial composition. For these reasons alone, the effects of the proposed undertaking on historic properties should be carefully considered in accordance with Section 106 regulations.

Given the international stature that such a triumphal arch would assume, we began our comments by seeking insight from comparable monuments in other cities, notably the Arc de Triomphe in Paris and the 9/11 Memorial in New York City. Both of those famous and heavily visited monuments serve as focal points and destination venues that attract and can accommodate large crowds for public gatherings. In turn, the monuments feed the vitality of street life, businesses, and cultural attractions the urban fabric around them. In contrast, the proposed triumphal arch would be isolated and constrained on a high-volume traffic circle on Columbia Island, which is entirely parkland removed from the urban fabric of Washington. The location does not suggest a likelihood of success for a celebratory monument.

We cited insightful comments of those testifying recently to the National Capital Planning Commission, including veterans and family members of those buried at Arlington National Cemetery, about locating the arch at its entrance. Much eloquent testimony was given on how a 250-foot-high triumphal monument would be divisive and not healing. It would also severely damage an exceptional cultural landscape and one of the most important symbolic places in the nation.

Given the substantial adverse effects at the Memorial Circle location, we recommended that the National Park Service consider an alternate location for the arch, specifically at the newly created oval marking the arrival of South Capitol Street at the Anacostia River and its shift in direction to cross the new Frederick Douglass Bridge. This location offers multiple advantages. It is on direct axis with the Capitol and would mark the entrance to the original city on one of the four cardinal axes emanating from the Capitol dome. The 166-foot height of its main block would be more in scale with the 288-foot height of the Capitol dome. It would establish a direct visual interrelationship with the Capitol dome in the same manner as the other reciprocal vistas that characterize the L'Enfant city. It marks the intersection with Potomac Avenue, creating additional designed views. Its elongated shape would better accommodate a crowd that could arrive at multiple crossings controlled by traffic lights. It sits between Nationals Park and Audi Field, whose combined capacity is 60,000 seats. It would create an energizing focal point for a still-emerging neighborhood, suitable for a celebratory crowd. With the new RFK stadium at 70,000 seats and other historic recreational facilities a short distance away along the Anacostia River, it could become a symbol of sports triumph and an icon for a hoped-for DC Olympic Games. And importantly, it would enhance the historic L'Enfant Plan and the city's monumental landscape rather than detracting from it.

We appreciate your informing us about the numerous public comments you have received. We are particularly interested in any comments from DC residents and organizations so that we can better fulfill our responsibility to reflect the interests of the District of Columbia and its citizens. We are also interested in how you will be making comments available to consulting parties and taking them into account. We look forward to discussing this at a future consulting parties meeting.

As required by 36 CFR 800.3(c)(3), consultation is carried out in a manner commensurate with the nature of the undertaking and its effects on historic properties. The unprecedented nature of this proposal and the extraordinary level of public interest clearly require full consideration of alternatives that could avoid, minimize, or mitigate adverse effects. The potential for such effects on National Historic Landmarks elevates the requirement for planning to minimize harm. Exclusion of alternatives that may involve site relocation or diminution of the structure is not consistent with these requirements.

Our recommended alternative site is not a mitigation measure but a way to avoid adverse effects, which is a preferred outcome in Section 106 review. We would like to hear the views of other parties on it and any other suggestions. As part of the consultation process, we would like to know if NPS has considered other ways to avoid the adverse effects associated with this undertaking, and if so, what they were and why they were rejected. We have made no decision on whether there are measures that could adequately minimize or mitigate the adverse effects of the proposal and cannot make such a decision without first hearing and considering the views and suggestions of routinely qualified consulting parties who have expressed an interest in participating as such. These parties have so far been denied the opportunity to participate. We look forward to further consultation with you and all interested consulting parties as set forth in the regulations.

Sincerely,



David Maloney  
District of Columbia State Historic Preservation Officer

26-0593

cc: Consulting Parties