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Anna West Winter



Save Our Heritage

Protecting the birthplace of the American Revolution,
the cradle of the American Environmental Movement,
and the home of the American Literary Renaissance.

September 29, 2026

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

Re: Comments on the Triumphal Arch at Memorial Circle

Dear Ms. Loichinger:

On behalf of *Save Our Heritage*, I write to oppose the proposed Monumental Arch, also known as the Triumphal Arch, at Memorial Circle, and to object to the early termination of its Section 106 review. Our organization protects the historic landscape of Concord, Massachusetts, and its surroundings: the birthplace of the American Revolution, the cradle of the American Environmental Movement, and the home of the American Literary Renaissance. We have worked closely with the *National Trust for Historic Preservation*, and we share its concerns.

Our nation's story began not with a coronation or a conquest, but with ordinary people. On April 19th, 1775, farmers from Concord and neighboring towns gathered at the North Bridge. They had sought representation through every lawful means. When those efforts failed, those "embattled farmers," as Ralph Waldo Emerson memorialized, fired "the shot heard round the world." That shot set in motion the founding of a nation built not on kingdoms, pageantry, or monuments to power, but on the natural rights of every person and on the idea that government draws its authority from the governed.

The commemorations of that day reflect its spirit. The monument at the North Bridge is a modest granite obelisk. The Minute Man statue by Daniel Chester French depicts a farmer who has left his plow to take up his musket. Nearly half a century later, French sculpted the seated Abraham Lincoln who gazes across the Potomac toward Arlington. It was Lincoln who gave lasting voice to the experiment those farmers began: "government of the people, by the people, for the people." The Arch would stand directly in that line of sight, and it would overshadow the very memorial that honors him.

Washington, D.C. has long reflected these founding principles. Its low, horizontal skyline, its restrained memorials, and its open vistas express a quiet but unmistakable strength that is admired throughout the world. Our founding rested on the brilliance of ideas, not on massive or glittering edifices. A triumphal arch belongs to the tradition of empires. It is foreign to the character of a republic that has always let its principles, rather than its ornaments, speak for it.

We ask the Council to consider the following concerns:

First, the Arch would cause serious and lasting harm to one of the nation's most sacred landscapes. Its scale and location would overwhelm the Lincoln Memorial, Arlington House, and Arlington Memorial Bridge, and would disrupt the long, open vista that honors the veterans buried at Arlington National Cemetery and the nation's reunification after the Civil War. The National Park Service has itself acknowledged that the project would adversely affect 37 historic properties. Its height would also break with the long practice of applying the Height of Buildings Act to federal projects, a principle that has given the capital its beloved skyline.

Second, the review process has not given the public or consulting parties a meaningful opportunity to be heard. Section 106 exists so that federal projects do not needlessly harm the nation's historic places without first weighing less harmful alternatives. Here, consultation was limited and rushed, parties including the *National Trust* were excluded, and the review was terminated before consultation was complete. A comment period of three and a half business days is not adequate for a project of this national significance.

Third, reasonable alternatives were never seriously evaluated, including another site, a smaller structure, or a different design. The District of Columbia State Historic Preservation Officer has proposed the base of South Capitol Street at the Anacostia riverfront, which would avoid harm to existing memorials, sit on axis with the U.S. Capitol, and give visitors a welcoming setting.

We respectfully urge the Council, in its comments to the Secretary of the Interior, to recommend that the Arch not proceed at Memorial Circle as proposed, and that less harmful alternatives be fully evaluated before any decision is made.

The farmers who stood at the North Bridge needed no ornament to secure their place in history. Their courage and their convictions were enough. We ask that their memory, and the memory of all who have sacrificed for this nation, be honored by preserving the dignity and restraint of the landscape between the Lincoln Memorial and Arlington National Cemetery.

Thank you for your consideration.

Sincerely,



Anna West Winter
Executive Director
Save Our Heritage
anna@saveourheritage.com

cc: Elizabeth S. Merritt, Deputy General Counsel, National Trust for Historic Preservation