

DRAFT

**Environmental Assessment
for
Exterior Improvements to the
Eisenhower Executive Office Building**

**Executive Office of the President
Office of Administration**

October 2026

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Executive Office Building

Acronyms and Abbreviations

°F	degrees Fahrenheit	NAAQS	National Ambient Air Quality Standards
ACHP	Advisory Council on Historic Preservation	NCPC	National Capital Planning Commission
ACM	Asbestos Containing Material	NEPA	National Environmental Policy Act
APE	Area of Potential Effects	NHL	National Historic Landmark
BIM	Building Information Modeling	NHLD	National Historic Landmark District
BMPs	Best Management Practices	NHPA	National Historic Preservation Act of 1966
CAA	Clean Air Act	NHS	National Historic Site
CDFs	Character-Defining Features	NO _x	Oxides of Nitrogen
CFR	Code of Federal Regulations	NPS	National Park Service
CO	Carbon Monoxide	NRHP	National Register of Historic Places
dB	decibel	OA	Office of Administration
dBA	A-weighted decibel scale	O ₃	Ozone
DC HPO	State Historic Preservation Office for the District of Columbia	PM ₁₀	particulate matter with aerodynamic size less than or equal to 10 micrometers
DCMR	District of Columbia Municipal Regulations	PM _{2.5}	particulate matter with aerodynamic size less than or equal to 2.5 micrometers
EA	Environmental Assessment	PP	Preservation Plan
EEOB	Eisenhower Executive Office Building	psi	Pounds per square inch
EO	Executive Order	ROI	Region of Influence
EOP	Executive Office of the President	tpy	Tons per year
FONSI	Finding of No Significant Impact	U.S.	United States
FR	Federal Register	U.S.C.	United States Code
GSA	General Services Administration	USEPA	United States Environmental Protection Agency
HBIM	Heritage Building Information Modeling	VOC	Volatile Organic Compound
HSR	Historic Structure Report		
LBP	Lead-Based Paint		

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1.0 Purpose and Need

1.1 Introduction

This Environmental Assessment (EA) evaluates the potential environmental impacts of an effort by the Office of Administration (OA) in the Executive Office of the President (EOP) to restore and beautify the Dwight D. Eisenhower Executive Office Building (EEOB) and bring it into visual alignment with the neighboring White House. Section 590 of Public Law 100-461 authorizes the OA Director to accept gifts, property, and voluntary services to support renovation and rehabilitation of the EEOB, and establishes a United States (U.S.) Treasury fund for those purposes. OA proposes to rehabilitate and improve the granite façade of the EEOB and to better align its visual character with that of the White House (Proposed Action).

The assessment of environmental impacts is an important and integral part of OA's decision-making process. While OA is not a federal agency and thus is not required to comply with the National Environmental Policy Act of 1969, as amended (NEPA; 42 United States Code [U.S.C.] §§ 4321 et seq.), OA has prepared this EA voluntarily to analyze and disclose the potential environmental effects of the Proposed Action.

1.2 Background

The EEOB is located to the west of the White House at 17th Street and Pennsylvania Avenue NW. Designed by Alfred B. Mullet and constructed between 1871 and 1888, it is an example of French Second Empire style architecture. The building's façade is primarily constructed of a salt-and-pepper gray "Petersburg" granite quarried in Richmond, Virginia, while the foundation and first level are light gray "Vinalhaven Island" granite from Maine. While originally built to house the State, War, and Navy Departments, these tenants had vacated the building by 1947. Subsequently, the EEOB came to house the agencies which comprise the Executive Office of the President, and has now evolved from its original Cabinet purposes into a functional extension of the White House.

From its completion, the EEOB's highly ornate design has generated criticism, with some observers viewing it as incompatible with the surrounding neoclassical federal architecture (Quinn Evans Architects, 1993). By the time the building was completed, the French Second Empire style had gone out of fashion (USEOP, 1984). Subsequently, several proposals were developed to either significantly modify the building's exterior or demolish it entirely, including plans to replace its French Second Empire features with a neoclassical façade similar to that of the neighboring Treasury Building, which had been constructed from 1836 to 1869 (Bloch, 1957; National Parks Service, 2024). However, the scale and cost of such modifications ultimately prevented their implementation. The EEOB was later designated a National Historic Landmark (NHL) in 1969 (DeFerrari, 2014), and listed on the National Register of Historic Places (NRHP) and the District of Columbia Inventory of Historic Sites

in 1972. The EEOB is also a contributing resource to the Lafayette Square National Historic Landmark District (NHLD).

Today, the building represents a successful example of adaptive reuse, or the practice of retaining and rehabilitating a historic structure so that it remains fully functional while preserving its defining architectural features. Renovations and preservation efforts have been ongoing since 1981 (Quinn Evans Architects, 1993). An extensive multi-year project completed in 1994 restored the roof and decorative cast iron elements. In 1995, major heating, ventilation, and air conditioning upgrades eliminated the need for window air-conditioning units. Additional modernization projects were implemented in the early 2000s to enhance antiterrorism and force protection measures following September 11, 2001. Roof repairs, façade cleaning, and painting of cast iron ornamentation also occurred from the early 2000s to 2010s. However, no work has been completed to meaningfully elevate its aesthetic appearance.

1.3 Purpose and Need

Pursuant to Executive Order (EO) 14344, *Making Federal Architecture Beautiful Again*, “applicable Federal public buildings should uplift and beautify public spaces, inspire the human spirit, ennoble the United States, and command respect from the general public.” The EO further directs that “when renovating...applicable Federal public buildings...the feasibility and potential expense of building redesign to meet those criteria should be examined. Where feasible and economical, such redesign should be given substantial consideration, **especially with regard to the building’s exterior**” (emphasis added). These requirements are particularly salient with reference to buildings like the EEOB, which stand at the center of the Nation’s capital and are closely associated with the home of the executive branch of government. At present, several areas of the EEOB’s façade are deteriorating, including areas of granular disintegration, delamination, incipient spalling, cracking, chipping, as well as gypsum salt accumulation, efflorescence, stains from exposure to contaminants, and biological growth which have increased over time, diminishing the building’s appearance and stature. Aside from visible degradation at various locations, the gray façade of the EEOB, in combination with its size and massing, conveys a darker, drab, and uninspiring presence at the heart of American government, historically detracting from the aesthetic presentation of the much smaller White House, which is directly adjacent to it. The current state of the EEOB is inconsistent with EO 14344 and, given the cultural significance of the White House and the EEOB’s close proximity and functional relationship with it, it is especially important that its physical appearance be restored and enhanced so as to elevate, rather than detract from, the White House and the landscape in which it sits.

The purpose of the Proposed Action, therefore, is to improve the public experience of the EEOB, and by extension the White House and the surrounding public areas, consistent with recent federal architectural policy emphasizing design quality and civic presence. The Proposed Action is needed to meet federal policy objectives for civic architecture, to restore

and enhance the visual character of the EEOB in a manner appropriate for its proximity and close functional relationship to the White House, and to support institutional dignity.

1.4 Public Involvement

This EA and a Draft Finding of No Significant Impact (FONSI) are available for public comment over a 30-day period. A Notice of Availability for the EA and FONSI for public review and comment was published in the Federal Register.

This Proposed Action is also voluntarily engaging in National Capital Planning Commission (NCPC) review in accordance with its authority under 40 U.S.C. §§ 8701 et seq. to review project plans and development proposals for federal property. OA coordinated with NCPC during preparation of the EA, and comments received during the NCPC submission process were considered in the analysis. OA first presented the Proposed Action to NCPC for concept review at the NCPC's meeting on May 7, 2026.

The Commission of Fine Arts (CFA) also participates in the design review of government properties in the National Capital. OA voluntarily presented the Proposed Action for concept review at the CFA's meeting on April 16, 2026, and received concept approval from CFA the same day.

OA voluntarily provided the Draft Assessment of Effects Report to the District of Columbia Historic Preservation Office (DC HPO) and the Consulting Parties. Copies of relevant correspondence are included in **Appendix A**.

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2.0 Description of the Proposed Action and Alternatives

NEPA requires all reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief summary of the reasons for their dismissal. For this analysis, an alternative is considered “reasonable” if it is technically and economically feasible and would meet the Proposed Action’s purpose and need. “Unreasonable” alternatives that would not meet the Proposed Action’s purpose and need were dismissed from further consideration and evaluation in this EA.

2.1 Proposed Action

OA proposes to rehabilitate and improve the granite façade of the EEOB to restore and beautify its physical appearance, consistent with EO 14344, and to better align the building’s visual character with that of the White House.

2.1.1 Exterior Painting (Preferred Alternative)

Under the Exterior Painting Alternative (the Preferred Alternative), the EEOB’s whole granite façade (excluding the interior courtyards) would be painted with white mineral silicate paint (**Figure 1** and **Appendix B**). The White House is also painted with a mineral silicate paint, and painting the EEOB with the same type of paint would not only improve the current state of the EEOB, consistent with EO 14344, but also align the two buildings visually and better represent the EEOB as a functional extension of the White House (**Figure 2** and **Appendix B**).

Figure 1. Rendering of Proposed Exterior Painting (Preferred Alternative)



Figure 2: Rendering of Preferred Alternative and West Wing of White House

Mineral silicate paints are advertised as highly breathable and durable wall coatings that are composed of natural materials and potassium silicate. However, before initiating any work on the façade of the EEOB, several mineral silicate paint formulations would be tested to identify the best specific brand and application protocol (e.g., primers, intermediates, and topcoats, if appropriate) for the Preferred Alternative. Laboratory testing on representative granite samples would include adhesion and accelerated weathering tests to evaluate the performance, durability, and reliability of the paint. Field test panels using equivalent granite samples may also be used to confirm coating performance, application methods, and compatibility with the granite. Although paint removal is not anticipated, the testing phase would also be used to evaluate removal techniques that could be implemented in the future without harming the granite and mortar joints. To date, OA has contracted a firm to complete testing of both the adhesion and removability of this paint on the specific type of stone used in the EEOB (**Appendix C**). The initial findings indicate the paint's adhesion is adequate and comparable to other types of post-applied exterior surface coatings, and that paint removal via pressure washing is effective; however, more testing is planned.

To begin work, heavy-duty scaffolding would need to be installed to safely reach all floors of the building. The scaffolding system would be designed and installed by a qualified contractor specializing in commercial scaffolding to ensure structural stability, worker safety, and compliance with applicable Occupational Safety and Health Administration standards. Installation would be coordinated with building operations in order to minimize disruptions to building occupants. The scaffolding would remain in place for the duration of the work and be inspected regularly in accordance with safety requirements. Upon completion of the work, the

scaffolding would be professionally dismantled and removed from the site, and temporary staging areas would be restored to pre-construction conditions.

After scaffolding has been installed, the granite façade would be cleaned to prepare the granite surfaces for painting. Dampness, biological growth, soiling, staining, and efflorescence would all be addressed as part of surface preparation. To begin the cleaning process, the granite would be saturated with water at low pressure to remove any large debris. Then, a liquid detergent would be applied with a pump sprayer or soft bristle brush to remove grime, dirt, and stains that have been created by biological growth and environmental pollutants. A small area of the granite would be tested to determine the efficacy of any cleaning products prior to full application, and the products would be applied according to the product manufacturer's specifications. The cleaner would then be rinsed from the building with medium pressure power washers positioned at least 18 inches from the building surface.

Concurrently with cleaning, the Preferred Alternative would also include the following preservation measures, as necessary, to prepare the granite surfaces for painting. These measures would be performed in accordance with Secretary of the Interior's Standards for the Treatment of Historic Properties (NPS, 2017):

- **Repointing.** Repointing would consist of removing deteriorated mortar from masonry joints and installing new mortar that matches the historical material. This measure would restore the weather-resistant seal between stone units and prevent water infiltration that could accelerate stone deterioration. Repointing would be completed in accordance with Brick Industry Association Guidelines and applicable portions of the Secretary of the Interior's Standards.
- **Sealant replacement.** Sealant replacement involves removing aged or failing joint sealant and installing new silicone sealant at all applicable joints. Sealant for a building is typically replaced every 10 to 20 years to maintain watertight conditions and reduce the potential for moisture intrusion. The work would follow manufacturer specifications and preservation best practices consistent with the Secretary of the Interior's Standards.
- **Stone crack repair.** Stone crack repair includes stabilizing and sealing cracks in the granite. It would be used in circumstances where the existing stone unit is in relatively good condition. These repairs help to prevent water intrusion and extend the life of the existing material.
- **Dutchmen repair.** Dutchmen repair involves cutting out deteriorated pieces of stone, inserting a precisely fitted replacement piece, and securing it with stainless steel pins and epoxy. These repairs are used to address localized damage while retaining the majority of the existing stone.
- **Stone replacement.** When stone deterioration is too extensive to repair, the entire granite unit can be removed and replaced with new stone that matches the existing material in composition and appearance.

After cleaning and stone preservation measures have been completed and all stone, mortar, and sealant are dry, paint would be applied to the façade using a roller, sprayer, or brush, depending on the features being painted and in accordance with the application methods identified during the testing process. Construction quality control measures, including monitoring environmental conditions (e.g., temperature, sunlight, and humidity) and application consistency, would be employed to ensure proper coating and long-term performance of the paint. A qualified testing and inspecting agency would be engaged to inspect and monitor the painting process to ensure that granite moisture levels and coating thickness are consistent with the standards established during laboratory and field testing.

Mineral silicate paints are long-lasting; the paint does not fade or peel and resists weathering. However, to maintain the appearance of the EEOB, routine maintenance would be necessary. The façade would be soft washed annually using a 2,800 pounds per square inch (psi) pressure washer with the nozzle positioned several feet away to remove biological growth, soiling, and pollution. Spot painting may be necessary if gradual wear or discoloration are identified. Spot painting would involve cleaning any areas to be painted and applying additional coats of paint. Scaffolding would be installed as needed to access all levels of the building for soft washing and any necessary spot painting. The same maintenance protocol is implemented for the White House.

In addition to painting the granite, the Preferred Alternative may also include re-painting the cast iron. Cast iron painting would involve cleaning the building's decorative cast iron elements, such as chimneys, sculptures, cornices, railings, and roof trim, to remove dirt, corrosion, and peeling paint. Some existing coatings may contain lead-based paint (LBP); where present, lead-containing materials would be abated in accordance with applicable federal, state, and local regulations prior to repainting. The new paint coating would protect the iron from moisture and ongoing oxidation.

After painting is completed, exterior façade lighting would be added to the EEOB to further enhance the building's exterior appearance and highlight the newly painted walls through a layered approach consisting of general flood lighting and building-mounted accent lighting. A detailed lighting plan would be developed during final design in consultation with qualified lighting specialists familiar with federal preservation standards and in accordance with General Services Administration (GSA) guidelines for upgrading historic building lighting as well as the NCPC's lighting policy and framework. The lighting plan would include details, such as the number and location of fixtures, intensity of light, equipment, and installation method, consistent with guidance from GSA, NCPC, National Park Service (NPS), and other consulting parties. New lighting fixtures would be located in inconspicuous positions and designed to avoid visual competition with historic features. The type of light would be clear, and the intensity would be appropriate for a monumental building in the downtown core.

Work under the Preferred Alternative would occur on weekdays, generally between 6:00 a.m. and 4:00 p.m. Equipment staging and material laydown areas would be established

immediately adjacent to the building, and would not extend onto public sidewalks or rights-of-way. These areas would be organized to maintain safe access to the building and surrounding areas throughout the duration of construction. Because painting activities are temperature dependent, they would likely experience seasonal stoppages during peak winter and summer weeks. Typically, paint application can occur between temperatures of approximately 40 degrees Fahrenheit (°F) to 86°F.

2.1.2 Partial Painting Alternative

Under the Partial Painting Alternative, only the upper portions of the EEOB granite façade would be painted with white paint (**Figure 3** and **Appendix B**). The foundation and first level of the EEOB have a different gray tone than the upper granite walls because the granite was quarried in a separate location. The upper granite walls above the foundation and first level would be painted in the same manner described for the Preferred Alternative, while the foundation and first level would only be cleaned. The additional masonry preservation measures and cast iron painting described under the Preferred Alternative would also be performed on all levels of the building as necessary. As described under the Preferred Alternative, a detailed lighting plan would be developed during final design, and exterior façade lighting would be added in accordance with federal preservation standards and guidance from GSA, NCPC, NPS, and other consulting parties. This alternative would be less costly and time-intensive, as a portion of the building would remain unpainted, but would still improve the aesthetics of the EEOB. Annual maintenance described under the Preferred Alternative would also be conducted under the Partial Painting Alternative.

Figure 3. Rendering of Partial Painting Alternative



2.1.3 Cleaning and Lighting Alternative

Under the Cleaning and Lighting Alternative, the EEOB would be cleaned and exterior façade lighting would be added in accordance with the Secretary of Interior Standards for Historic Properties. The EEOB has undergone periodic cleaning as part of ongoing maintenance, and the specifications developed for this alternative would be consistent with those implemented during prior cleaning efforts. Cleaning would use the gentlest means possible to avoid damage to the stone or mortar. Effectiveness of cleaning methods may vary depending upon the condition being treated and severity of soiling, so multiple cleaning methods may be applied to the building.

Before a cleaning method is selected and building-wide cleaning is performed, test panels would be evaluated for efficacy of the method and the effect on the stone. Scaffolding would be installed in order to reach the entire building, and cleaning would occur during the months when environmental conditions are most appropriate (i.e., where there is no possibility of freezing temperatures or when temperatures are too high). The primary cleaning method for the granite would be water and a soft bristle brush. Acidic or alkaline chemical cleaners may be utilized, if needed, following the Secretary of Interior Standards. Because both acidic and alkaline cleaners may pose hazards to historic masonry, these more aggressive methods would only be undertaken where necessary and only after completing testing and mockups with review by a qualified Architectural Conservator. More ornate areas, such as delicate carvings and sculptures, may require gentler cleaning methods.

A detailed lighting plan would be developed during final design, and exterior façade lighting would be added in accordance with federal preservation standards and guidance from GSA, NCPCH, NPS, and other consulting parties.

2.2 No Action Alternative

Under the No Action Alternative, cleaning and painting of the EEOB façade would not occur. Weathering of the building façade would continue, and the aesthetics of the building would not be brought into alignment with the White House. The No Action Alternative would not meet the purpose of and need for the Proposed Action; however, it is carried forward for analysis in this EA to provide a comparison of baseline conditions to the Proposed Action. The No Action Alternative reflects the status quo and serves as a benchmark against which effects of the Proposed Action can be evaluated.

2.3 Alternatives Eliminated from Further Consideration

OA initially considered three additional alternatives to achieve the purpose of and need for the Proposed Action. These alternatives included recladding the façade, bush hammering the façade, and painting the façade with an acrylic or latex-based paint. OA eliminated these alternatives from further consideration because of their cost and potential for significant environmental impacts, as described below.

2.3.1 Recladding

OA considered adding new, lighter colored stone panels (e.g., limestone or similar) on top of the granite façade to more closely match the color of the White House. Although this alternative may have met the purpose of and need for the Proposed Action, OA determined that this approach would introduce substantially greater cost and environmental disturbance associated with procuring, transporting, and installing the new stone panels. Therefore, this alternative was eliminated from further consideration.

2.3.2 Bush Hammering

Bush hammering the granite would involve using a repeated impact method to alter the surface of the stone, thereby creating a lighter appearance more consistent with the surrounding architecture. However, this approach could compromise the durability of the stone and would permanently change the texture of the granite. As such, this alternative was eliminated from further consideration.

2.3.3 Acrylic or Latex-Based Paint

The use of acrylic or latex-based paint was considered in lieu of mineral silicate paint. Although this alternative may have met the purpose of and need for the Proposed Action, OA determined that these paint types would pose a greater risk to the longevity of the granite. Acrylic and latex-based paints are less permeable than mineral silicate paints and could trap moisture, potentially causing the granite to crack or flake during freeze-thaw cycles. Painting the building with these types of paint could result in moisture retention, efflorescence, and subflorescence that could harm the granite. Therefore, this alternative was eliminated from further consideration.

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3.0 Affected Environment and Environmental Consequences

This chapter describes the affected environment and potential environmental consequences for resource areas that could be affected by the action alternatives. Resources dismissed from detailed analysis in the EA, and the justification for their dismissal, are presented in **Table 1**.

Table 1. Resources Dismissed from Detailed Analysis

Environmental Resource	Justification
Land Use	Land uses adjacent to the EEOB include federal land occupied by the White House, Lafayette Square, President's Park, and the Renwick Gallery of the Smithsonian, and high-density commercial office buildings. The Proposed Action would not alter the function, occupancy, or footprint of the EEOB. No changes in land use or compatibility with surrounding uses would occur. Therefore, land use is dismissed from further analysis.
Geology, Topography, and Soils	The Proposed Action would not involve ground disturbance (except perhaps to anchor scaffolding in some locations), excavation, grading, or changes to topography. Therefore, no impacts to geology, topography, or soils would occur, and these resources are dismissed from further analysis.
Water Resources	The area surrounding the EEOB consists of impervious surfaces and maintained lawn areas, and no wetlands are present. The EEOB is located outside of any Federal Emergency Management Act-regulated floodplains (FEMA, 2010). There would be no increase in impervious surfaces as a result of the Proposed Action. Further, the Proposed Action would not result in new point or nonpoint sources of water pollution and would not involve meaningful ground disturbance, in-water work, or modification of surface waters, wetlands, floodplains, or groundwater resources. As such, these resources are dismissed from further analysis.
Archaeology	The EEOB property is previously disturbed. The Proposed Action does not include any new ground disturbance (except perhaps to anchor scaffolding in some locations) or change to existing site paving and grading. As such, there is no potential for the Proposed Action to affect archaeological sites, and this resource is dismissed from further analysis.
Recreation	The Proposed Action would not alter access to or availability of recreational resources or facilities surrounding the EEOB. The President's Park, Lafayette Square, and the First Infantry Division Monument would be accessible during the implementation of the Proposed Action. All public sidewalks and the pedestrian portion of Pennsylvania Avenue in front of the White House would be able to be used normally. Staging for all work would occur in areas that are restricted from public access. Accordingly, recreational resources are dismissed from further analysis.

Environmental Resource	Justification
Socioeconomics and Children's Environmental Health and Safety	The Proposed Action would not result in changes to the number of personnel employed at the EEOB; therefore, no long-term changes to local socioeconomic conditions are anticipated. Implementation of the Proposed Action may result in temporary benefits from increased expenditures for materials and labor but would have a minimal effect on the regional economy. There is no potential for significant economic effects. No changes to population, demographics, income, community services and facilities, or housing would occur. EO 13045, <i>Protection of Children from Environmental Health and Safety Risks</i>, directs federal agencies to identify and assess projects for potential disproportionate impacts to children's environmental health and safety. During the implementation of the Proposed Action, children would not be allowed access to work areas in order to protect them from Proposed Action activities and work hazards. A daycare facility is located across the street from the EEOB in a separate building. However, given the temporary nature of the work and the physical separation between the EEOB and the daycare facility, the Proposed Action would not result in disproportionate impacts to children's environmental health and safety, as children would not be present in the vicinity of the EEOB any more than the general public. Accordingly, socioeconomics and children's environmental health and safety are dismissed from further analysis.
Traffic and Transportation	A major north-south arterial that runs between the National Mall and Dupont Circle, 17th Street NW, is located to the west of the EEOB. The portion of Pennsylvania Avenue that is located north of the EEOB is closed to vehicle traffic. The Proposed Action would not require new transportation facilities or modification of these existing roadways. The Proposed Action would result in a temporary increase in vehicle traffic associated with contractor vehicles and the transportation of construction equipment and materials to the EEOB, but there is no potential for these impacts to be significant. In the long-term the Proposed Action would not increase vehicle traffic or affect the existing level of service on any roadways. Therefore, traffic and transportation are dismissed from further analysis.
Utilities	The Proposed Action would not require modifications to existing utility infrastructure or the installation of new utility connections. No changes to water, wastewater, stormwater, electric, gas, or telecommunications systems would occur beyond minor temporary use of the building's water and electricity while work is performed. Therefore, the Proposed Action would not result in any long-term changes to utility demand or capacity, and utilities are dismissed from further analysis.

Environmental Resource	Justification
Wildlife & Habitat	The EEOB is located in a developed urban area where vegetation primarily consists of maintained landscaping; high-quality wildlife habitat is not present. The Proposed Action would occur on and immediately adjacent to the existing building and would not involve vegetation removal. Federally listed species identified by the USFWS Information for Planning and Consultation tool include the northern long-eared bat (<i>Myotis septentrionalis</i>, endangered), the tricolored bat (<i>Perimyotis subflavus</i>, proposed endangered), and the monarch butterfly (<i>Danaus plexippus</i>, proposed threatened) (USFWS, 2026). Areas surrounding the EEOB do not contain suitable roosting habitat (e.g., trees, caves, and mines) for the bat species, as the EEOB is within a developed urban area with vegetation limited to frequently mowed grass and ornamental trees and shrubs. Additionally, no suitable forage areas (e.g., forest, forest edges, waterways) for the bat species are present near the EEOB. No tree or vegetation removal would occur as part of the Proposed Action and no milkweed for monarch breeding would be affected. Because the Proposed Action is limited to façade work on an existing structure and would not alter any habitat, the Proposed Action would have no effect on listed species or designated critical habitat. As such, wildlife and habitat are dismissed from further analysis.

3.1 Visual Resources and Aesthetics

Visual resources and aesthetics refer to the visible features on a landscape, both manmade and natural, moving and stationary. Although visual quality is partly subjective, visual characteristics that often render an area less attractive include clashing or incoherent architectural elements, unorganized mixing of open and built spaces, presence of litter, and dead or dying vegetation. Actions that remedy or mitigate such characteristics generally improve visual quality.

The Region of Influence (ROI) for visual resources and aesthetics includes the viewsheds from which the EEOB is potentially visible. The EEOB is most prominently visible along 17th Street NW and Pennsylvania Avenue NW, two major roadways in central Washington, D.C. Importantly, however, the EEOB is also visible from Lafayette Square and the Ellipse, the two most popular public viewing locations for the White House (NPS, 2025), which is a major draw for the visitors. In these viewsheds, the EEOB and Treasury Building frame the White House. Finally, the EEOB is visible from elevated vantage points, such as the Washington Monument and Old Post Office Tower.

3.1.1 Affected Environment

The EEOB has a monumental presence along the 17th Street and Pennsylvania Avenue streetscapes. Due to its massive size and shallow setbacks, the building's visibility is almost completely unobscured along these streets. The building is further distinguishable by its French Second Empire architecture style and gray granite façade, which is unique among the classical

buildings that characterizes much of Washington, D.C.'s federal architecture. Due to the granite exterior, the building naturally has a more drab and muted color. In addition, at present, some areas of cracking, iron oxidation, biological growth, soiling, dirt, staining, and chipping are visible on the building, particularly on features that project out from the walls, such as porticos, staircases, windowsills, and cornices. As a result, the EEOB's current condition does not elevate the visual character of the surrounding public area, including the adjacent White House.

The White House, the seat of the United States' Executive Branch, and the President's Park, in which the White House sits, draw crowds of visitors from around the world due to their beauty and cultural significance. The President's Park includes Lafayette Square and the Ellipse, which are located directly north and south of the White House respectively. The White House and its surroundings are also visible from bordering streets and raised historic structures. Views were major factors in Pierre Charles L'Enfant's 1791 plan of Washington, D.C., and the White House and its grounds represent one of the most culturally and historically significant views in Washington, D.C. The EEOB and Treasury Building, two similarly scaled and massed unpainted stone buildings, frame the White House when viewing it from the Ellipse or Lafayette Square. These views have been continually maintained by the NPS to preserve them for the enjoyment and inspiration of the American public.

3.1.2 Environmental Consequences

3.1.2.1 Exterior Painting – Preferred Alternative

The primary improvement under the Preferred Alternative would involve cleaning the surface of the EEOB and coating it with white mineral silicate paint. The Preferred Alternative would also include other preservation measures, such as repainting decorative cast iron elements, repairing cracks in masonry, addressing existing causes of degradation and replacing any heavily deteriorated stones. In order to complete this work, heavy-duty scaffolding would be professionally installed to safely reach all floors of the building. During this period, scaffolding and construction equipment would obscure the building and temporarily disrupt the character of the viewsheds around the building, causing a *short-term, less-than-significant adverse impact* to visual resources and aesthetics.

Following the completion of the improvements and removal of temporary construction features (i.e., scaffolding), the new lighter color of the EEOB would create more aesthetically pleasing and uplifting appearance for the building relative to the darker, drab, and uninspiring nature of the existing gray, in accordance with federal architectural policy. It would also elevate and establish a visual connection with the White House, and improve the public experience of the surrounding area. Existing stains and surface soiling would be addressed as part of the painting process, and the lighter color would appear cleaner. Routine cleaning and maintenance would ensure that the paint retains its clean appearance. In order to complete this work, scaffolding would need to be installed temporarily, which may result in short-term adverse impacts to views of the building on an annual basis. No changes to the landscaping, site layout, or

architectural form of the EEOB would occur. Masonry preservation measures and re-painting of the cast iron features would further enhance the building's visual character at close proximity by addressing standard maintenance needs. The addition of exterior façade lighting would also highlight the EEOB's historic architectural features and newly painted appearance. The lighting plan would consider light levels, color temperature, and fixture placement; it would be developed in consultation with qualified specialists, and consistent with federal preservation standards and appropriate for a monumental building in the downtown core. Overall, the Preferred Alternative would have *long-term, beneficial impacts* on visual resources and aesthetics.

3.1.2.2 Partial Painting Alternative

Impacts to visual resources under the Partial Painting Alternative would be similar to those described under the Preferred Alternative. Heavy-duty scaffolding would be professionally installed around the building in order to clean all levels and paint the upper levels, as well as undertake any necessary masonry preservation measures. During this period, scaffolding and construction equipment would obscure the building and temporarily disrupt the character of the viewsheds around the building. Therefore, *short-term, less-than-significant adverse impacts* to visual resources and aesthetics would occur, although the duration of these impacts would be shorter than the duration expected under the Preferred Alternative.

Upon completion of the improvements and removal of scaffolding, the EEOB would be noticeably cleaner and create a more aesthetically pleasing appearance for the building relative to the darker, drab, and uninspiring nature of the existing gray granite. Although the entire building would not be painted, the upper floors, which are most visible from more distant and open lines of sight, would be. The existing difference in color between the upper levels and first two levels of the building would be maintained. Masonry preservation measures and repainting of the cast iron features would further enhance the building's visual character at close proximity by addressing standard maintenance needs. The addition of exterior façade lighting would also highlight the EEOB's historic architectural features and new painted appearance, as described under the Preferred Alternative. As with the Preferred Alternative, routine cleaning and maintenance would be necessary and may result in short-term adverse impacts to views of the building on an annual basis. Overall, the Partial Painting Alternative would have *long-term, beneficial impacts* on visual resources and aesthetics.

3.1.2.3 Cleaning and Lighting Alternative

Under the Cleaning and Lighting Alternative, the EEOB would be cleaned of the gypsum salt accumulation, efflorescence, soiling, stains, and biological growth, and exterior façade lighting would be added. Cleaning would require scaffolding to reach the entire exterior of the building for cleaning. The presence of scaffolding and equipment before and during cleaning would cause a *short-term, less-than-significant adverse impact* to visual resources and aesthetics. After cleaning is complete, the improved cleanliness of the building under this alternative would be apparent from nearby viewpoints, but not at greater distances. The additional exterior

façade lighting would offer improvements by highlighting the EEOB's historic architectural features, but would lack the more noticeable visual improvement of lighting a newly painted building. As such, this alternative would not fully achieve the intended effect of improving the public experience of the EEOB, and by extension the White House and the surrounding public realm. Despite this, the Cleaning and Lighting Alternative would still result in *long-term, beneficial impacts* to visual resources and aesthetics.

3.1.2.4 No Action Alternative

Under the No Action Alternative, cleaning and painting of the EEOB façade would not occur. Weathering and soiling of the building façade would continue, and the aesthetics of the building would not uplift the White House and surrounding public areas in the manner expected of federal architecture. Therefore, the No Action Alternative would result in *long-term, less-than-significant adverse impacts* to visual resources and aesthetics.

3.2 Cultural Resources

Cultural resources are historic properties as defined by the National Historic Preservation Act of 1966 (NHPA); cultural items as defined by the Native American Graves Protection and Repatriation Act; archaeological resources as defined by the Archaeological Resources Protection Act; sacred sites as defined by EO 13007, *Indian Sacred Sites*, to which access is afforded under the American Indian Religious Freedom Act; and collections and associated records as defined by 36 CFR Part 79.

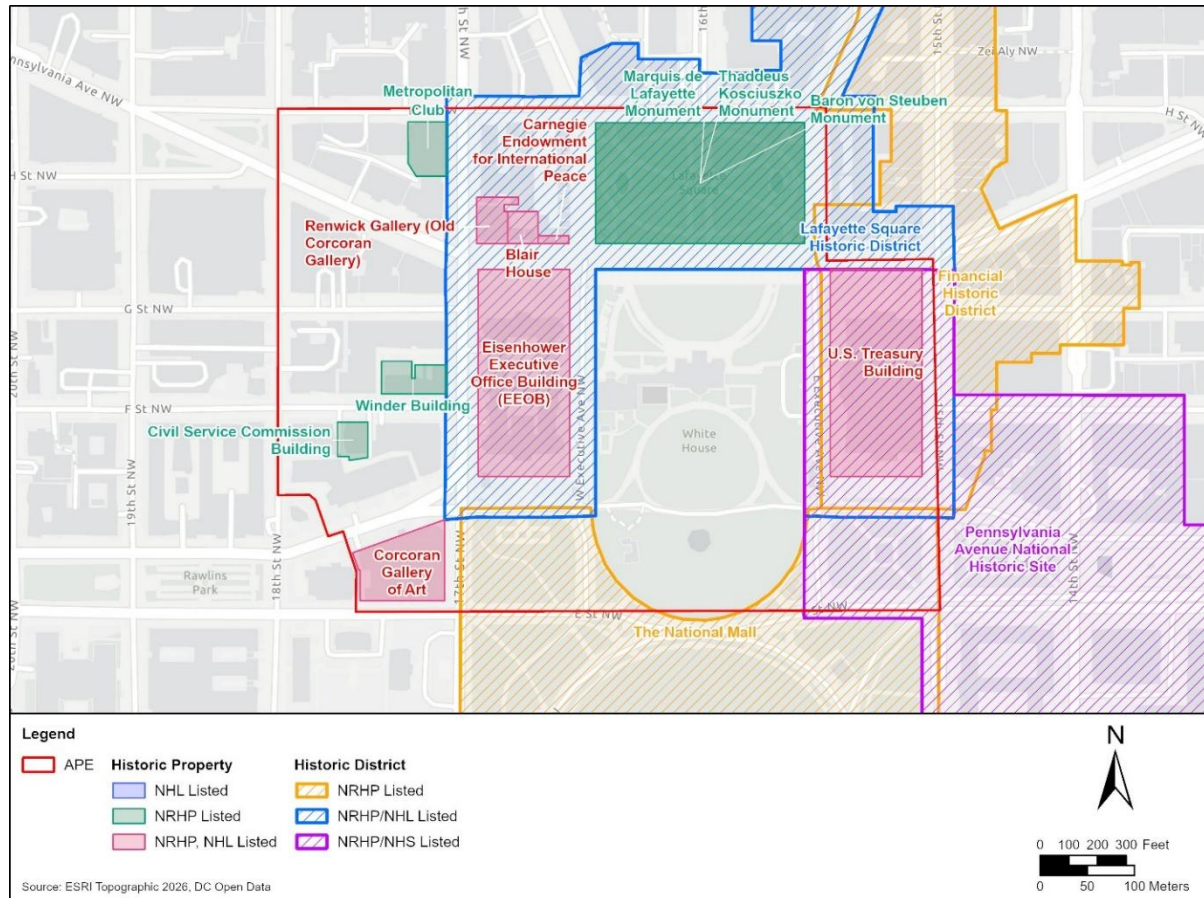
Historic properties covered by the NHPA include any prehistoric or historic district, site, building, structure, or object with known or potential significance with regard to pre- or post-American history, architecture, archaeology, engineering, or culture. Section 106 of the NHPA requires federal agencies to consider the effect an undertaking may have on historic properties. Additionally, as an individually designated NHL within an NHL, the EEOB is subject to Section 110(f) of the NHPA.

Although the Proposed Action would be considered an undertaking under the NHPA, the United States Government maintains that the EEOB is on the White House grounds and, as a result, is exempt from NHPA Section 106 review procedures pursuant to Section 107 of the NHPA. Furthermore, OA is also not a federal agency and not subject to the NHPA. However, OA is voluntarily following NHPA procedures for this Proposed Action because they provide a generally well-understood framework by which to consider potential effects on cultural resources and incorporate input from agencies with special expertise in cultural resources. Accordingly, OA has prepared an Assessment of Effects Report to evaluate the effects of the alternatives in accordance with the NHPA (**Appendix C**). OA has engaged the CFA, and sought consultation with NCPC (see **Section 1.4**), DC HPO, and the ACHP.

The ROI for cultural resources is the area of potential effects (APE), which is a geographic area that may be directly or indirectly affected by the Proposed Action. The APE for the Proposed Action is bounded by 18th Street, NW to the west, E Street, NW to the south, 15th

Street, NW and Lafayette Square to the east, and H Street, NW to the north (**Figure 4**). The APE boundaries reflect the outer limits from which views toward the property may reasonably be adversely affected. Distant views, primarily of only the EEOB's roof, were generally excluded from the APE.

Figure 4. Area of Potential Effects (APE)



3.2.1 Affected Environment

The EEOB is individually listed in the NRHP and designated as an NHL. The building also contributes to the Lafayette Square Historic District, which is listed in the NRHP and designated as a NHL. The Lafayette Square Historic District encompasses Lafayette Square and the surrounding blocks of historically significant buildings (**Figure 4**). The centerpiece of the Lafayette Square Historic District is Lafayette Square. Key contributing governmental buildings in the district include the U.S. Treasury Department, Chamber of Commerce Building, and the EEOB.

The EEOB provides office space for components of the Executive Office of the President. Constructed between 1871 and 1888, the building was originally known as the State, War, and Navy Building and served as headquarters for those three federal departments. The building was renamed in 1999 in honor of President Dwight D. Eisenhower (GSA, 2026; The White

House, n.d.). The EEOB is widely recognized as one of the most prominent examples of French Second Empire style architecture in the United States. The six-story building occupies a full city block adjacent to the White House and is constructed primarily of gray granite with ornamental cast-iron detailing. Character-defining features (CDFs) on the building exterior include carved granite columns and pilasters, granite cornices, constructed sculpture accentuated by shadows, window architraves and crown mold belt courses, a mansard roof sheathed in slate shingles, ornate cast iron trim, railings, cornices, and chimneys, original doors, windows with elements that are either original or have been replaced in kind, and the exterior granite walls.

Interior spaces contain numerous historically significant architectural features dating to the original construction period. These include granite staircases with bronze balustrades, stained glass skylights and domes, and extensive cast-iron structural and decorative elements. Several ceremonial and historically important rooms remain intact, including the Indian Treaty Room and historic departmental libraries, which feature marble wall panels, ornamental plasterwork, encaustic tile floors, and gold-leaf decorative elements.

Since the 1980s, the building has historically undergone periodic restoration and modernization to maintain functionality while preserving historic character. Restoration efforts have addressed building systems and historic interiors while maintaining significant architectural features. The building continues to serve as office space for approximately 1,500 federal employees and houses several offices associated with the Executive Office of the President (GSA, 2026; The White House, n.d.).

In addition to the EEOB and Lafayette Square Historic District, the APE also includes the following listed resources, a smaller portion of two NRHP-listed historic districts, and one National Historic Site (NHS):

- **Corcoran Gallery of Art.** The Corcoran Gallery of Art is a three-story, Beaux Arts-style building constructed between 1894 and 1897 on the west side of 17th Street, NW between E Street and New York Avenue, NW. Its main entrance and character-defining curved wall faces 17th Street and the EEOB and White House/President's Park.
- **Civil Service Commission Building.** Completed in 1911, the Civil Service Commission building is a six-story structure that served as the headquarters of the U.S. Civil Service Commission from 1911 to 1932. Located mid-block and facing north on F Street, NW, the façade of the property includes views toward the EEOB's west side.
- **Winder Building.** The Winder Building is a substantial structure located on the west side of 17th Street directly across from the EEOB's west pavilion and entrance. It stands five stories in height and includes a raised basement and painted brick walls. Constructed between 1847 and 1848 and designed as a government

building, it is one of the few surviving pre-Civil War office buildings in Washington, D.C.

- **Metropolitan Club.** Constructed in 1908, the Metropolitan Club was Washington, D.C.'s first literary and social club for men. The building sits at the southwest corner of the intersection of 17th and H Streets, NW. Its membership included political appointees and important businessmen and is noted for its location near many key governmental buildings, including the EEOB, though it has limited views of the building due to its location a full block to the north.
- **Renwick Gallery (Old Corcoran Gallery).** Built 1859-1864 and designed by renowned architect James Renwick, Jr., the building originally housed the Corcoran collection of American and European art. The building sits in a prominent and highly visible location at the corner of 17th Street and Pennsylvania Avenue, NE, facing the EEOB's north elevation.
- **Blair House.** The 1824 Blair House and its three adjacent 19th century rowhouses are significant for their federal and early 19th century architecture as well as their association with numerous important historical events, including their role as the President's official guest house since the 1940s. The Blair House complex is located on Pennsylvania Avenue adjacent to the Renwick Gallery. It sits directly across from the EEOB's north side.
- **Carnegie Endowment for International Peace.** Known today as the Peter Parker House, the Carnegie Endowment for International Peace building was constructed as a private dwelling in 1860. It is situated just east of Blair House at the corner of Pennsylvania Avenue and Jackson Place, NW. Facing east, its side (south) elevation faces the EEOB. The building later served as the headquarters for the Carnegie Endowment from 1910 until 1948.
- **U.S. Treasury Building.** The Treasury Building was constructed between 1836 and 1869 to house the federal government's Treasury Department. It flanks the White House on the east side and extends more than a block along the 15th Street streetscape. It was built over the course of several decades and is the result of designs by five major architects, including Alfred B. Mullet (architect of the EEOB).
- **Financial Historic District.** The Financial Historic District is a largely linear historic district that extends along 15th Street from the Treasury Building at Pennsylvania Avenue on the south to the north side of K Street on its northern end. The district includes 36 contributing buildings, including the Treasury Building. The district includes excellent and monumentally scaled examples of 19th and early 20th century classical and revival-style bank and office buildings.
- **Pennsylvania Avenue NHS.** The Pennsylvania Avenue NHS is the historic ceremonial route for the Presidential inaugural parade. It is a largely linear historic district that extends the broad, radiating Pennsylvania Avenue between the White

- House and Capitol, including a large portion of the federal and local governmental cores. The site includes many nationally important buildings such as the U.S. Treasury Building, Ford's Theater, and the Old Patent Office as well as numerous features and elements of the 1791 L'Enfant Plan. The APE intersects a very small portion of the site's westernmost edge to include the Treasury Building. The EEOB is not within its boundaries and views of the EEOB to and from the site are distant.
- **National Mall Historic District.** The National Mall Historic District is one of the country's earliest and most significant designed landscapes and a major element of the 1791 L'Enfant Plan and 1901-02 McMillan Plan for the City of Washington. The district includes the historic mall, Washington Monument and U.S. Capitol grounds, President's Park South, and the many museums and institutions that line the historic mall. While the APE includes a small portion of the district's northern side, the EEOB was intentionally excluded from the district due to the historic extent and design of the National Mall.

Although located within the APE for the Proposed Action, the White House is not subject to NHPA procedures pursuant to Section 107. Accordingly, the White House is not listed on the NRHP and is not included in any historic district. In addition, while the White House is designated as an NHL, it is not regulated under Section 110(f) of the NHPA.

3.2.2 Environmental Consequences

3.2.2.1 Exterior Painting (Preferred Alternative)

The NHPA Section 106 implementing regulations define an adverse effect, in part, as one which may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR § 800.5).

Under the Preferred Alternative, the interior of the EEOB would not be modified. Of the EEOB's exterior CDFs, the granite walls are among the most visible and imposing. Masonry preservation activities for these walls, such as repointing, crack repair, and sealant replacement, would follow previous exterior restoration efforts' means and methods and Secretary of the Interior's Standards. However, the granite walls have never historically been coated. Water-repellent or waterproof coatings can cause moisture entrapment below the surface of the coating and potentially result in flaking of the stone. Mineral silicate paints are intended to be vapor permeable and allow moisture to pass through to prevent entrapment; however, they may still reduce the vapor permeability of the surface relative to bare stone. Standard measures of vapor permeance consider a rating of greater than 10 perms to be "vapor permeable" (Buildingscience.com, 2013). Mineral silicate paints have vapor permeance ratings between approximately 75 and 85 perms. Therefore, if moisture-related issues are addressed

before the building is painted, as is proposed, these highly vapor permeable paints are unlikely to cause significant moisture retention.

Testing of removal of mineral silicate paints from natural stone has not been heavily studied. However, preliminary adhesion and removal testing conducted by OA's contractor indicates that pressure washing may effectively remove the paint from the granite with minimal visible surface changes, supporting a recommendation for a more comprehensive testing protocol (**Appendix C**).

The exterior granite walls and details are a CDF and central component of the EEOB's style, function, and original design intent. The two types of gray and pink-hued granite used in the building's façade were chosen by Alfred B. Mullett based on the color and quality of the raw material. Therefore, the design, materials, workmanship, setting, and feeling that is conveyed through the building's exterior materials would be diminished and fundamentally altered by coating it with paint. Despite the use of reputable products, it would result in a highly visible change to a nationally significant building (for which reversibility is uncertain) that would impair historical continuity and diminish the EEOB's value as an exemplar of the French Second Empire architectural style.

The addition of exterior façade lighting is not expected to result in adverse effects. Because fixtures would be installed in inconspicuous locations, and wiring and conduits would be concealed within existing building cavities or behind walls, the work would not alter any CDFs. Consultation with qualified lighting specialists during final design would take into account the number and location of fixtures, intensity of light, equipment, and installation method in accordance with federal preservation standards to enhance the visibility and appreciation of the EEOB's historic façade.

Because the courtyards of the EEOB would remain unpainted, a portion of the building would remain in the original condition. In addition, to reduce the potential for adverse effects under the Preferred Alternative, OA would implement several mitigation measures to address management, documentation, and public appreciation of the EEOB. These mitigation measures would include the following:

- Heritage Building Information Modeling (HBIM) or Building Information Modeling (BIM) would be conducted via drone and/or lidar scanning to create a digital record of the building and serve as a baseline and guide for monitoring conditions and planning future rehabilitation or restoration efforts.
- A detailed exterior maintenance plan would be developed to outline maintenance requirements for the selected paint formulation.
- The Historic Structure Report (HSR) and Preservation Plan (PP) for the EEOB would be updated to incorporate current research, document physical changes to the building, and record major repairs that have occurred.
- The existing 1969 NRHP nomination form for the EEOB would be updated.

- Public education materials and an exhibit within the EEOB describing the EEOB's original architectural design, stylistic features, and historic use of unpainted granite would be prepared. These materials would be supplemented by color photographs showing the EEOB's original appearance and may consist of walking tours, website content, or interpretive panels.
- Web-based materials highlighting the work and career of Alfred B. Mullett would be developed to enhance public understanding of the building's design and historical significance.
- An oral history project recording interviews with former employees who worked in the EEOB would be conducted.

The proposed change in the appearance of the EEOB would also affect the Lafayette Square Historic District and the Treasury Building. The EEOB has a monumental presence within the historic district, particularly along 17th Street and Pennsylvania Avenue; as such, it is central to the character and integrity of the Lafayette Square Historic District. By painting the EEOB, the Preferred Alternative would impact historic viewsheds from the west and north of the historic district and alter the architectural character of the district. The Preferred Alternative would also disrupt the visual hierarchy between the EEOB, White House, and Treasury Building that has been in place for over 125 years. The hierarchy currently consists of the EEOB and Treasury Building as two similarly scaled and massed unpainted stone buildings that serve the Executive Branch of the federal government and flank the White House. The White House is by comparison much smaller in size and scale, but its placement at the center of the grounds and white color communicates its importance.

Overall, the design, materials, workmanship, setting, and feeling that is conveyed through the EEOB's primary exterior material would technically be diminished relative to its historical condition. The unpainted exterior granite walls, including their natural detail (e.g., grey and pink hues), were hand-selected by the architect and are central to the building's historic character and original design intent. Painting the granite would alter these characteristics, resulting in an adverse effect to the EEOB under the NHPA. Similarly, the integrity of setting, materials, feeling, and/or association of the Lafayette Square Historic District and Treasury Building would be adversely affected. However, while the appearance, particularly the color, of the building would evolve from gray to white, the overall style of the EEOB, including its monumental and imposing nature, would remain consistent with its current and historical conditions, as would its role in the architectural landscape. Further, adverse effects on the EEOB's historic character would be reduced through the implementation of mitigation measures, which include long-term management plans, updated documentation, and enhanced public interpretation. As such, there would be *long-term less-than-significant adverse effects* to cultural resources under the Preferred Alternative, including the EEOB, Lafayette Square Historic District, and Treasury Building.

Several additional buildings in the APE have either a historic functional relationship to the EEOB, or the EEOB contributes to their overall setting, feeling, and association. These include the Winder Building, Blair House, and the Metropolitan Club. Both the Winder Building and Blair House have a historical relationship to the EEOB as government-owned buildings that, together with the EEOB and White House, contribute to the character of the area as the city's governmental core. The Metropolitan Club was intentionally located near the EEOB, White House, and other key governmental buildings to serve their employees and visiting dignitaries. Whether the EEOB is painted is of less importance to the integrity of these historic properties; based on the criteria of adverse effect, there would be no adverse effect to these additional buildings under the NHPA, and consequently very minor *long-term, less-than-significant adverse effects* under NEPA.

There would be *no effect* to the following cultural resources in the APE: the Corcoran Gallery of Art, Civil Service Commission Building, Renwick Gallery (Old Corcoran Gallery), Carnegie Endowment for International Peace, Financial Historic District, Pennsylvania Avenue NHS, and National Mall Historic District. These properties either lack a historical and sustained functional relationship with the EEOB or do not feature views of the EEOB as a key characteristic feature.

3.2.2.2 Partial Painting Alternative

Impacts to cultural resources under the Partial Painting Alternative would be similar to those described under the Preferred Alternative, though leaving the foundation and first level unpainted would reduce the magnitude of the effects to the building, as three of the building's seven floors (the basement, ground floor and fifth floor/roof) would remain unchanged. The addition of new façade lighting is not expected to result in adverse effects. Because painting the exterior of the EEOB's upper floors would impact the building's historic appearance for the same reasons described for the Preferred Alternative, the Partial Painting Alternative would result in an adverse effect to the EEOB, Lafayette Square Historic District, and Treasury Building under the NHPA. As with the Preferred Alternative, there would be no adverse effect to the Winder Building, Blair House, and the Metropolitan Club.

As noted above with regards to the Preferred Alternative, the overall architectural style and massing of the EEOB would remain unchanged under the Partial Painting Alternative, as would its role in the architectural landscape. Therefore, in NEPA terms, there would be *long-term, less-than-significant adverse effects* to the EEOB, Lafayette Square Historic District, and Treasury Building under the Partial Painting Alternative, and there would be very minor, *long-term, less-than-significant adverse effects* to the Winder Building, Blair House, and the Metropolitan Club. There would be *no effect* to other cultural resources in the APE.

3.2.2.3 Cleaning and Lighting Alternative

Under the Cleaning and Lighting Alternative, the EEOB would be cleaned and exterior façade lighting would be added. Appropriate, gentle cleaning methods at soiled areas of the building,

combined with the use of test panels to evaluate various cleaning methods before they are applied consistently, would have an overall beneficial effect on the building by removing soiling, stains, and biological growth that could be harmful if left untreated over the long term. Cleaning would also improve the overall appearance of the building when viewed at close proximity. Exterior façade lighting designed in accordance with federal preservation standards would enhance the visibility and appreciation of the EEOB's historic façade. Therefore, the Cleaning and Lighting Alternative would have *long-term, less-than-significant beneficial effects* on cultural resources in the APE. This Alternative would result in no adverse effect to the EEOB and no effect on other historic properties under the NHPA.

3.2.2.4 No Action Alternative

Under the No Action Alternative, cleaning and painting of the EEOB façade would not occur. Over time, soiling, stains, and biological growth would continue to accumulate on the stone, which may contribute to gradual deterioration of the material. This deterioration could diminish the EEOB's visual quality and impact viewsheds within the APE. Therefore, the No Action Alternative would result in a potential adverse effect on the EEOB and Lafayette Square Historic District under the NHPA, corresponding to a *long-term, less-than-significant adverse effect* under NEPA. There would be no effect on any other cultural resources in the APE.

3.3 Air Quality

Air quality conditions at a given location are a function of several factors including the amounts of pollutants emitted locally and regionally, as well as how they disperse into the air. Primary factors affecting pollutant dispersal include wind speed and direction, atmospheric stability, climate and temperature, and topography.

Air quality is affected by stationary emissions sources (e.g., boilers, emergency generators, and industrial processes), mobile sources (e.g., motor vehicles, construction equipment, and aircraft), and area sources (e.g., vehicle and aircraft fuel transfer, storage, and dispensing). The ROI for air quality is the National Capital Interstate Air Quality Control Region, which includes Washington, D.C. (40 Code of Federal Regulations [CFR] § 81.12).

3.3.1 Affected Environment

3.3.1.1 Criteria Pollutants

Under the Clean Air Act (CAA) and its amendments, the U.S. Environmental Protection Agency (USEPA) identifies air pollutants that may reasonably be anticipated to endanger human health or welfare and establishes standards to regulate these pollutants (42 U.S.C. §§ 7408-7409). National Ambient Air Quality Standards (NAAQS) are established by the USEPA for six pollutants (as listed under Section 108 of the CAA of 1970): carbon monoxide (CO); lead; nitrogen dioxide; ozone (O₃); particulate matter, divided into two size classes of 1)

aerodynamic size less than or equal to 10 micrometers (PM₁₀), and 2) aerodynamic size less than or equal to 2.5 micrometers (PM_{2.5}); and sulfur dioxide.

USEPA and state/local air quality control agencies monitor and evaluate outdoor air quality for compliance with the NAAQS. Areas where monitored outdoor air concentrations are within an applicable NAAQS are considered in attainment of that NAAQS. If sufficient ambient air monitoring data are not available to decide, the area is instead deemed as attainment/unclassifiable. Areas where monitored outdoor air concentrations exceed the NAAQS are designated by the USEPA as nonattainment. Nonattainment designations for some pollutants (e.g., O₃) can be further classified based on the severity of the NAAQS exceedances. Lastly, areas that have historically exceeded the NAAQS but have since instituted controls and programs that have successfully remedied these exceedances are known as maintenance areas.

Washington, D.C. is designated by the USEPA as a maintenance area for the 2008 8-hour O₃ NAAQS and as a moderate nonattainment area for the 2015 O₃ NAAQS (EPA, 2026). This means that ambient O₃ concentrations in Washington, D.C. exceed the 8-hour O₃ standards identified in 40 CFR Part 50, 73 Federal Register (FR) 16436, and 80 FR 65292. The ROI is considered in attainment/unclassifiable for all other criteria pollutants.

The General Conformity Rule (40 CFR Part 51, Subpart W) requires federal agencies to prepare written Conformity Determinations for federal actions in or affecting NAAQS in nonattainment areas to demonstrate that their actions will not cause or contribute to violations of the NAAQS, except when the action is exempt because the total increase in emissions is insignificant, or *de minimis*. Because the Proposed Action would occur in an area considered nonattainment for the current O₃ NAAQS, a General Conformity applicability analysis has been prepared. Additionally, Washington, D.C. is included in the Ozone Transport Region. As such, OA has evaluated the emissions of O₃ precursors (i.e., oxides of nitrogen [NO_x] and volatile organic compounds [VOC]) to determine the applicability of General Conformity regulations. In Washington, D.C., *de minimis* levels for VOC and NO_x are 50 and 100 tons per year, respectively (40 CFR § 93.153).

3.3.2 Environmental Consequences

Emissions from mobile combustion sources that would be used to implement the Proposed Action (e.g., generators, pressure washers, aerial lifts, contractor personal commute vehicles, material delivery trucks) were calculated using the latest version of USEPA's Motor Vehicle Emissions Simulator model's 2026 emission rates. Evaporative VOC emissions from primer and paint application were calculated using a VOC content of 100 grams per liter, which is the maximum allowable VOC content for surface coating products, per 20 D.C. Municipal Regulations § 774.10. This results in a conservative estimate, as mineral silicate paints typically have a much lower VOC content. VOC emissions for cast iron painting were estimated using a VOC content of 50 grams per liter, based on representative manufacturer material safety data sheets (Benjamin Moore, 2025). Emissions estimates for each Proposed Action alternative are depicted in **Table 2** and are further discussed in the following sections.

All activities and resulting emissions were assumed to occur in 2026 to provide the highest annual emissions scenario.

Contractors would be required to maintain non-road equipment in accordance with manufacturers' specifications to reduce exhaust emissions. Non-road equipment used for each of the three Proposed Action alternatives would be certified in accordance with USEPA regulations for non-road engines (40 CFR Parts 89 and 1039).

Table 2. Proposed Action Projected Annual Emissions, 2026

Pollutant	Exterior Painting (Preferred Alternative) Emissions (tpy)	Partial Painting Alternative Emissions (tpy)	Cleaning and Lighting Alternative Emissions (tpy)	General Conformity <i>de minimis</i> Threshold (tpy)
VOC	3.862	3.340	0.439	50
NO _x	4.203	4.196	3.778	100
CO	17.186	16.578	7.954	N/A
SO _x	0.007	0.007	0.006	N/A
PM ₁₀	0.207	0.206	0.168	N/A
PM _{2.5}	0.196	0.195	0.160	N/A

3.3.2.1 Exterior Painting (Preferred Alternative)

The Preferred Alternative would have *short-term, less-than-significant adverse impacts* to the existing air quality environment in the vicinity of the Proposed Action during the proposed cleaning, surface preparation, painting, and maintenance activities. The Preferred Alternative would have the greatest potential emissions of the three Proposed Action alternatives. Criteria pollutant emissions would include exhaust emissions from non-road equipment used for scaffolding erection and removal, pressure washing, paint spraying application, and maintenance activities. Fugitive VOCs would be emitted during stone primer and paint application and cast iron painting. Fuel combustion in contractor employee commute vehicles and material delivery and debris hauling trucks would contribute to the short-term increase of cleaning, painting, and maintenance-related emissions.

Ongoing annual maintenance emissions would result primarily from fuel combustion in contractor vehicles accessing the site, trucks delivering and removing scaffolding and heavy equipment, and construction equipment needed for erecting and removing scaffolding and performing maintenance activities. Estimated annual emissions from maintenance activities are 0.465 tpy of VOC, 3.781 tpy of NO_x, 8.505 tpy of CO, 0.006 tpy of SO_x, 0.169 tpy of PM₁₀, and 0.161 tpy of PM_{2.5}. The nature and magnitude of the Preferred Alternative are expected to create only temporary localized air quality impacts to the immediate area surrounding the EEOB during the initial work and ongoing annual maintenance activities.

Because the Proposed Action would be located in an area that is considered in nonattainment for the 2015 8-hour O₃ NAAQS, the Preferred Alternative's estimated annual emissions were compared to the *de minimis* thresholds for the O₃ precursors VOC and NO_x. Annual emissions resulting from the Preferred Alternative would be below the *de minimis* thresholds; therefore, the General Conformity Rule is not applicable to the Preferred Alternative, and no further analysis is warranted.

3.3.2.2 Partial Painting Alternative

The Partial Painting Alternative would have *short-term, less-than-significant adverse impacts* to the existing air quality environment in the vicinity of the Proposed Action during the proposed cleaning and limited surface preparation and painting activities. Criteria pollutants emitted would be comparable to the Preferred Alternative; however, the Partial Painting Alternative would result in lower emissions rates than the Preferred Alternative due to less non-road equipment operation associated with surface preparation and painting activities and fewer fugitive VOC emissions associated with stone and cast iron painting.

Ongoing annual emissions from maintenance would result from the same sources and at the same rates described for the Preferred Alternative; therefore, the Partial Painting Alternative would create only temporary localized air quality impacts to the immediate area surrounding the EEOB during the initial work and ongoing annual maintenance activities.

Similar to the Preferred Alternative, the estimated annual emissions associated with the Partial Painting Alternative were compared to the *de minimis* thresholds for the O₃ precursors VOC and NO_x. Annual emissions resulting from the Partial Painting Alternative would be below the *de minimis* thresholds; therefore, the General Conformity Rule is not applicable to this Alternative, and no further analysis is warranted.

3.3.2.3 Cleaning and Lighting Alternative

The Cleaning and Lighting Alternative would have *short-term, less-than-significant adverse impacts* to the existing air quality environment in the vicinity of the Proposed Action during the proposed cleaning activities. Criteria pollutant emissions would be similar to the Preferred Alternative and Partial Painting Alternative; however, the Cleaning and Lighting Alternative would not include stone surface primer and paint application or cast iron painting and would not cause fugitive VOC emissions associated with these products. For these reasons, the Cleaning and Lighting Alternative would cause fewer air pollutant emissions than the Preferred Alternative and Partial Painting Alternative.

Consistent with the Preferred Alternative and Partial Painting Alternative, the Cleaning and Lighting Alternative would create only temporary localized air quality impacts to the immediate area surrounding the EEOB. No new ongoing emissions would occur upon completion of the cleaning activities.

As with the Preferred Alternative and Partial Painting Alternative, annual emissions for the Cleaning and Lighting Alternative would be below the *de minimis* thresholds for VOC and NO_x. Therefore, the General Conformity Rule is not applicable to the Cleaning and Lighting Alternative, and no further analysis is warranted.

3.3.2.4 No Action Alternative

Under the No Action Alternative, the proposed surface cleaning, preparation, and painting and maintenance activities would not occur and there would be *no impact* to air quality. The ambient air quality environment would remain in its current existing condition.

3.4 Noise

Sound is vibrations in the air, which are known as compression waves. Just like a pebble dropped into a pond creates ripples, the compression waves, formed of air molecules pressed together, radiate from a source and decrease with distance. If these vibrations reach a human eardrum at a sufficient rate and intensity, we perceive it as sound. When the sound is unwanted, we refer to it as noise. Generally, sound becomes noise to a listener when it interferes with normal activities. Sound within the range of human hearing is measured on a logarithmic scale, known as the decibel (dB). The human ear does not hear all frequencies equally; the A-weighted decibel scale (dBA) is used to reflect the selective sensitivity of human hearing (USEPA, 1974).

Normal speech has a sound level of approximately 60 dBA. Sound levels above 120 dBA begin to be perceived as uncomfortable, while sound levels between 130 and 140 dBA are considered painful (Cowan, 1994; Egan, 2007). Examples of common sound levels encountered in daily life are shown in **Table 3**.

Table 3. Common Sound Levels

Sound Source	Sound Pressure Level (dBA)
Air Raid Siren at 50 feet	120
Maximum Levels at Rock Concerts (Rear Seats)	110
On Sidewalk by Passing Heavy Truck or Bus	90
On Sidewalk by Typical Highway	80
On Sidewalk by Passing Automobiles with Mufflers	70
Typical Urban Area	60-70
Typical Suburban Area	50-60
Quiet Suburban Area at Night	40-50
Typical Rural Area at Night	30-40
Isolated Broadcast Studio	20
Audiometric (Hearing Testing) Booth	10
Threshold of Hearing	0

Sources: (Cowan, 1994; Egan, 2007)

Natural factors such as topography, vegetation, temperature, and relative humidity can further reduce noise over distance. Acoustically “hard” sites (i.e., sites with a smooth reflective surface

along the direct sound path between the source and the receiver, such as paved parking lots or bodies of water) offer little or no ground attenuation due to acoustical absorption. “Soft” sites, on the other hand, are porous ground surface conditions characterized by loose soils, fresh-fallen snow, grass, or scattered bushes and trees that do increase attenuation (WSDOT, 2020).

A large object in the direct path between a noise source and a receiver can substantially attenuate noise levels at that receiver location. The amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. The lower the frequency, and hence the larger the wavelength, the less noise reduction the barrier provides. Natural terrain features such as hills and dense woods, as well as fabricated features such as buildings and walls, can substantially alter noise levels (WSDOT, 2020).

The ROI for noise includes areas within 1,000 feet of the Proposed Action. At this distance, most noise emitted from construction equipment attenuates to background levels of around 60 dBA under normal conditions. However, for this action, noise may attenuate to background levels in less than 1,000 feet given the shielding from large buildings adjacent to the EEOB to the west and north.

3.4.1 Affected Environment

The ambient noise environment in the vicinity of the ROI is characterized primarily by urban sources such as vehicular traffic on surrounding arterial roadways, local street traffic, transit operations, emergency vehicle activity, aircraft overflights associated with regional airports, and typical urban activities including building operations, landscaping equipment, and construction or maintenance work. Due to the dense urban development, buildings, paved surfaces, and other infrastructure may reflect and channel noise within street corridors, although nearby structures can also provide partial shielding that reduces noise propagation to indoor facilities and exterior areas beyond line of sight.

Sensitive receptors typically include residential dwellings, schools, childcare centers, hospitals, recreation spaces, and other noise-sensitive land uses. In Washington, D.C., these receptors commonly occur in close proximity to commercial and institutional uses due to the mixed-use development pattern found throughout Washington, D.C. As such, sensitive receptors may be located within several hundred feet of potential noise-generating activities. Sensitive noise receptors located within 1,000 feet of the EEOB include the Small Savers Montessori Child Development Center; the Goodwill Excel Center; the Center for School, Health and Education; buildings associated with the George Washington University; Lafayette Square; President's Park; and the Ellipse. The presence of major transportation corridors and dense development may influence how noise travels between sources and these sensitive receptors.

Noise in Washington, D.C. is regulated under the District of Columbia Noise Control Act and implementing regulations contained in Title 20 of the District of Columbia Municipal Regulations (DCMR). These regulations establish maximum permissible sound levels based

on zoning classification and time of day. Although federal land is not zoned, the areas surrounding the EEOB are within commercial zone D-2, D-5, and D-6 (D.C. Office of Zoning, 2025). Commercial zones allow up to 65 dBA during the daytime and 60 dBA at night; however, construction projects must adhere to additional regulations for construction noise under 20 DCMR Chapter 28. Daytime construction noise is limited to a maximum level of 80 dB at 25 feet from the edge of the site between 7:00 a.m. and 7:00 p.m., Monday through Saturday, while construction after 7:00 p.m. is limited to the zone maximum, in this case 60 dB at 25 feet from the edge of the site (DOB, 2024). Construction outside these hours, including work on Sundays or legal holidays, requires an after-hours permit issued by the District Department of Buildings.

3.4.2 Environmental Consequences

3.4.2.1 Exterior Painting (Preferred Alternative)

Proposed cleaning and painting activities associated with the Preferred Alternative could result in a temporary increase in noise levels within the ROI. Equipment such as lifts, scaffolding systems, airless and compressed-air paint sprayers, low-pressure washers, and other power tools, equipment, and vehicles powered by electric motors or gas engines could potentially be used and would be the primary source of noise during implementation of the Proposed Action. These types of equipment generate noise levels comparable to light construction or maintenance activities. The loudest activities would likely occur during surface preparation and cleaning, which may involve low-pressure washing, hand sanding, hand scraping, or other gentle methods to remove deteriorated paint and dirt and prepare surfaces.

Buildings located along Pennsylvania Avenue NW and 17th Street NW would be the closest receptors to the Proposed Action (i.e., within approximately 300 feet). Noise impacts would be the greatest at and immediately adjacent to the EEOB and would decrease with distance. For example, typical equipment such as cranes and generators can produce noise levels of approximately 100 dB at the source. This noise would decrease by about 6 dBA per doubling of distance, to approximately 80 dBA at 100 feet and 60 dBA at 1,000 feet (Montgomery County, 2026). Similarly, a low-pressure washer generates about 80 dBA at the source, with noise levels diminishing to less than 60 dBA at distances of 100 feet and beyond (PWNA, 2016).

As mentioned previously, sensitive receptors in Washington, D.C. may be located within 1,000 feet of potential noise-generating activities due to Washington, D.C.'s mixed-use development pattern. Although these receptors may be located relatively close to the Proposed Action, noise generated by cleaning and painting activities would be temporary and would attenuate with distance from the source. Noise levels associated with commonly used painting and surface preparation equipment are generally consistent with typical urban ambient noise conditions and are comparable to other routine building maintenance activities occurring throughout Washington, D.C.

Best Management Practices (BMPs), such as maintaining equipment in good working order, using manufacturer-recommended mufflers on generators or compressors, and limiting the use of louder equipment to daytime hours, would further minimize noise impacts during implementation of the Proposed Action. Although contractors may arrive and begin site preparations as early as 6 a.m., no activities exceeding the typical commercial noise threshold (60 dBA) would occur prior to 7 a.m. Because painting and associated surface preparation activities would be temporary, localized, and conducted during permitted daytime hours in accordance with Washington, D.C. regulations, the Preferred Alternative would result in *short-term, less-than-significant adverse impacts* to the overall noise environment. Following completion of the painting activities and dismantling of the scaffolding, the only ongoing or operational noise sources associated with the Preferred Alternative would be from annual cleaning and maintenance operations. Noise levels associated with these operations (i.e., low-pressure washing, scaffolding installation) would be consistent with typical urban ambient noise conditions and would only occur during permitted daytime hours. Therefore, the Preferred Alternative would have *no long-term impacts* to the ambient noise environment, and noise conditions in the surrounding area would return to typical urban background levels.

3.4.2.2 Partial Painting Alternative

Impacts to noise conditions and sensitive receptors under the Partial Painting Alternative would be similar to those described under the Preferred Alternative. The same types of noise-generating equipment would be used and would be the primary source of noise during implementation. Therefore, *short-term, less-than-significant adverse impacts* to the overall noise environment would occur, although the duration of these impacts would be shorter than the duration expected under the Preferred Alternative, since less of the façade would be painted. Following completion of the painting activities and dismantling of the scaffolding, the only ongoing or operational noise sources associated with the Partial Painting Alternative would be from annual cleaning and maintenance operations, which would be consistent with typical urban ambient noise conditions and would only occur during permitted daytime hours. Therefore, the Partial Painting Alternative would have *no long-term impacts* to the ambient noise environment, and noise conditions in the surrounding area would return to typical urban background levels.

3.4.2.3 Cleaning and Lighting Alternative

Under the Cleaning and Lighting Alternative, the EEOB would be cleaned and exterior façade lighting would be added. Scaffolding would be installed to reach the entire building, and a gentle method of cleaning with water, soft bristle brushes, and acidic or alkaline chemical cleaners would be used. Overall, the Cleaning and Lighting Alternative would have *short-term, less-than-significant adverse impacts* to noise primarily when scaffolding is installed and dismantled, and *no long-term impacts* to the overall noise environment.

3.4.2.4 No Action Alternative

Under the No Action Alternative, cleaning and painting of the EEOB façade would not occur. Therefore, there would be *no impact* on the overall noise environment of the ROI.

3.5 Solid and Hazardous Waste

This section assesses solid and hazardous waste that could be generated due to the Proposed Action. Solid waste, as defined by 40 CFR § 261.2, refers to any discarded material, including materials that are abandoned, recycled, or inherently waste-like. Hazardous substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment. Hazardous materials are regulated through a number of federal laws and regulations, most commonly the Resource Conservation and Recovery Act. The most comprehensive list is contained in 40 CFR Part 302, and identifies quantities of these substances that, when released to the environment, require notification to a federal government agency. Hazardous wastes, defined in 40 CFR § 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (solids or liquids) not otherwise excluded by 40 CFR § 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR Part 261. Petroleum products are specifically exempted from 40 CFR Part 302, but some are also generally considered hazardous substances due to their physical characteristics (especially fuel products), and their ability to impair natural resources.

The ROI for solid and hazardous waste consists of the EEOB property.

3.5.1 Affected Environment

As an active office building, the EEOB generates solid waste comparable to commercial office buildings of similar size. Waste generated by the EEOB is primarily paper, plastic, and food-based waste, which is disposed of by D.C. municipal sanitation systems and private sanitation contractors. The EEOB does not store or generate hazardous materials or waste.

The EEOB was constructed between 1871 and 1888, before hazardous building materials such as LBP were regulated. LBP regulation began in 1971 with the Lead-Based Paint Poisoning Prevention Act, which constrained the use of LBP primarily in residential buildings. Other relevant regulations include the Clean Water Act of 1972 and Safe Drinking Water Act of 1974, which regulate the release of lead into water. Since construction of the EEOB occurred before these regulations were implemented, LBP may be present on the building in areas where the Proposed Action is expected to occur. In particular, LBP may exist on the building's decorative cast-iron elements; the coatings of said cast-iron elements are currently peeling due to age. Although the cast-iron features have been routinely maintained and repainted since 1993, it is unknown if historical LBP remains on some features. Similarly, asbestos-containing materials (ACM) were first connected to health risks in the 20th century, well after the EEOB's construction had been completed, and are now regulated under the CAA and Toxic Substances Control Act. ACM may be present in the EEOB's internal building materials; however, it is

not expected to be present in any of the building's external elements that would be affected by the Proposed Action.

3.5.2 Environmental Consequences

3.5.2.1 Exterior Painting (Preferred Alternative)

Under the Preferred Alternative, the repainting of cast iron elements may require abatement of existing LBP due to the age of the building. LBP would likely be abated either through removal with a chemical paint stripper and light abrasion, or encapsulation under a fresh coat of paint. Throughout cast iron repainting, LBP and any other solid and hazardous waste would be managed in place and disposed of in accordance with all relevant district and federal regulations. Any abatement of LBP would be conducted by properly trained personnel.

Minor quantities of materials used during cleaning and painting activities, such as cleaning agents, paint products, and fuels (e.g., diesel and gasoline for generators), would have the potential for small, localized spills. Cleaning agents and paint products would not be considered hazardous materials, though they may be subject to separate Department of Transportation regulations for the transport of hazardous substances. Small amounts of hazardous materials (e.g., oils, solvents, petroleum products) may be used for equipment and generators; however, these would be managed and disposed of in accordance with federal, state, and local regulations and requirements. Contractors would be responsible for spill prevention and cleanup, and would employ BMPs including frequent removal of any collected solid and hazardous wastes from the site, performing routine equipment inspections, proper storage of painting and cleaning materials to avoid spills, and the usage of nontoxic and biodegradable cleaning agents where possible.

During painting and cleaning, the amount of additional solid waste generated would be negligible and would be managed by construction contractors and disposed of at permitted facilities with adequate capacity. The storage and disposal of all cleaning materials, paint products, and fuels would follow relevant standards and regulations. Thus, alterations to the EEOB under the Preferred Alternative may result in *short-term, less-than-significant adverse impacts* from exposure to LBP or accidental spills and possible *long-term, beneficial impacts* from LBP abatement. Annual maintenance activities would generate a negligible amount of solid waste and would not generate hazardous waste. The storage and disposal of any paint products necessary for spot painting would follow relevant standards and regulations. Therefore, routine maintenance would result in *long-term, less-than-significant adverse impacts* to solid and hazardous waste.

3.5.2.2 Partial Painting Alternative

The amount of solid waste generated under the Partial Painting Alternative would be less than the amount of waste generated under the Preferred Alternative, as less surface preparation and painting would occur. OA would comply with all relevant regulations for paint and cleaning products and would employ the BMPs listed under the Preferred Alternative. LBP would be

abated or encapsulated in the same manner as under the Preferred Alternative, and all relevant district and federal regulations would be followed. Therefore, the Partial Painting Alternative may result in *short-term, less-than-significant adverse impacts* from exposure to LBP or accidental spills and possible *long-term, beneficial impacts* from LBP abatement. As with the Preferred Alternative, the Partial Painting Alternative would require annual maintenance that may result in *long-term, less-than-significant adverse impacts* to solid and hazardous waste.

3.5.2.3 Cleaning and Lighting Alternative

Under the Cleaning and Lighting Alternative, the EEOB exterior be cleaned and exterior façade lighting would be added. Cleaning solvents would still be used. The OA would comply with all relevant storage and disposal regulations and employ the BMPs listed under the Preferred Alternative. Cast-iron elements would not be repainted, so LBP would not be abated or encapsulated. Cleaning the EEOB under the Cleaning and Lighting Alternative may result in *short-term, less-than-significant adverse impacts* from accidental spills.

3.5.2.4 No Action Alternative

Under the No Action Alternative, cleaning and painting of the EEOB façade would not occur, and the building would continue to operate under existing conditions. There would be no change to the generation of solid and hazardous waste; therefore, there would be *no impacts* to solid and hazardous waste.

4.0 Conclusions

This EA reflects the environmental analysis for the Proposed Action based on a review of the best available data and consultation/coordination with applicable agencies. This EA concludes that none of the alternatives for implementing the Proposed Action would have a significant impact on the human environment or require the preparation of an Environmental Impact Statement.

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Appendix A: Correspondence with Stakeholders

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EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF ADMINISTRATION
WASHINGTON, D.C. 20503

July 15, 2026

Mr. David Maloney
State Historic Preservation Officer
District of Columbia, Office of Planning
899 North Capitol Street NE
Washington, DC 20002

Subject: Initiation of Consultation under Section 106 of the National Historic Preservation Act for Exterior Improvements to the Eisenhower Executive Office Building, Washington, DC

Dear Mr. Maloney:

Consistent with Section 106 of the National Historic Preservation Act ("NHPA"), as amended (54 U.S.C. § 306108), and its implementing regulations, 36 C.F.R. Part 800, the Executive Office of the President, Office of Administration ("OA"), is voluntarily initiating consultation with the District of Columbia State Historic Preservation Office ("DC SHPO") regarding the proposed project to improve the granite façade of the Eisenhower Executive Office Building ("EEOB"). On January 22, 2026, DC SHPO informed OA that it would not consult on this Project because the EEOB is located on White House grounds and was, therefore, exempt from Section 106 of the NHPA. If the DC SHPO does not respond to this letter within 30 days, OA will assume that the DC SHPO's position remains that it will not consult on this Project.

As background, OA is not a federal agency and thus is not required to comply with the requirements of the NHPA (54 U.S.C. § 306107). Moreover, the EEOB is within the White House grounds and is therefore exempt from the requirements of the NHPA under Section 107. Even so, OA is voluntarily complying with the procedures of the NHPA for this Project because they provide a generally well-understood framework by which to consider potential effects on cultural resources and incorporate input from agencies with special expertise in cultural resources.

Under 36 CFR § 800.2(c)(1), OA invites DC SHPO to consult regarding the Project. OA further understands that because of the unique status of the District of Columbia, there is no separate local government which will consult pursuant to 36 CFR § 800.2(c)(3). Because the Project is not on tribal lands and does not involve a historic property with significance to Indian tribes and Native Hawaiian organizations, OA does not anticipate consulting with Indian tribes or Native Hawaiian organizations. If DC SHPO declines to consult, OA will invite the Advisory Council on Historic Preservation to consult.

Description of the Project

OA proposes to improve the granite façade of the EEOB to improve the public appearance of the building consistent with Executive Order 14344, Making Federal Architecture Beautiful Again,

and to better align its visual character with that of the White House. The EEOB is listed on the National Register of Historic Places (“NRHP”) and is both an individually designated National Historic Landmark (“NHL”) and a contributing building within the NRHP-designated Lafayette Square Historic District.

OA is considering three alternatives:

Alternative 1 involves cleaning the exterior granite to remove dirt and soiling material on all four exterior elevations to remove unattractive stains and improve the overall public appearance of the building. A gentle, conservation-based cleaning approach would be utilized. A similar approach was approved by reviewing agencies and interested parties when the exterior was last cleaned in the early 2000s.

Alternative 2 involves painting the previously unpainted exterior granite walls on all four elevations in a shade of white with mineral silicate paint to achieve a lighter visually cleaner overall appearance. A mineral-based silicate paint was chosen for its breathability and longevity. There are several mineral silicate paint products approved for use on historic masonry surfaces, including granite. The courtyard elevations would not be painted.

Alternative 3 involves painting the exterior granite walls to the upper floors of all four elevations only, leaving the raised foundation (currently a different type, texture, and shade of granite) unpainted. As with Alternative 2, the paint would be a shade of white mineral silicate paint and the courtyard elevations would remain unpainted.

To inform OA’s decision-making regarding the Project, it intends to undertake a testing protocol on the EEOB that would include (1) a façade condition assessment, (2) laboratory testing of up to thirteen core samples of two inches in depth and diameter, and (3) paint application and removal testing on approximately four inconspicuous 2x2 ft areas: two 2x2 ft sections of the pink granite from the Maine quarry and two 2x2 ft sections of the grey granite from the Virginia quarry.

Area of Potential Effects

Section 106 requires the determination and documentation of the Area of Potential Effects (“APE”). The APE is defined in 36 CFR § 800.16(d) as “the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The draft APE for the Project is bounded by 18th Street, NW to the west, E Street, NW to the south, 15th Street, NW and Lafayette Square to the east, and H Street, NW to the north. The APE boundaries reflect the outer limits from which views toward the property may reasonably generate adverse effects and include views and viewsheds from the surrounding area to the EEOB. Distant views primarily of the EEOB’s roof were excluded from the APE. OA has developed a graphic illustration of the draft APE that is subject to modification through the consultation process. *See* Attachment A.

Identification of Historic Properties

Historic properties within the APE were identified utilizing online databases including the NRHP, D.C. Office of Planning's PropertyQuest and HistoryQuest, Open Data D.C., and the D.C. Inventory of Historic Sites. The project area is within the District's federal core and thus has been well documented through historic resources surveys. A team of qualified architectural historians conducted a site visit on February 27, 2026, to confirm visibility of the building's main exterior floors from surrounding streets.

In addition to the EEOB, the proposed APE includes twelve listed resources—six of which are also NHLs. The properties in the APE are (1) the Lafayette Square Historic District (NRHP, NHL); (2) Corcoran Gallery of Art (NRHP, NHL); (3) Civil Service Commission Building (NRHP); (4) Winder Building (NRHP); (5) Metropolitan Club (NRHP); (6) Renwick Gallery (NRHP, NHL, within Lafayette Square NHD); (7) Blair House (NRHP, NHL, within Lafayette Square NHD); (8) Carnegie Endowment for International Peace (NRHP, NHL, within Lafayette Square NHD); (9) U.S. Treasury Building (NRHP, NHL, within the Lafayette Square and Financial NHDs, within the Pennsylvania Avenue NHS); (10) Financial Historic District (NRHP); (11) Pennsylvania Avenue National Historic Site (NRHP, NHS); and (12) National Mall Historic District (NRHP).

NEPA Coordination

OA will prepare an Environmental Assessment ("EA") to document the analysis of potential impacts of the proposed Project in accordance with the National Environmental Policy Act. OA will develop an Assessment of Effect for the Project as a separate, but parallel, process to the EA.

Public Involvement

Consistent with 36 CFR 800.2(d)(3), OA intends to provide a public comment period. OA has additionally been actively participating in public review processes before the National Capital Planning Commission ("NCPC") and Commission on Fine Arts ("CFA"). Both bodies have held initial hearings, and NCPC offered both an initial comment period and the opportunity for interested parties to testify. OA has reviewed the 573 pages of public comments submitted to the NCPC and will continue to participate in those robust public comment processes.

Sincerely,

**HEATHER
MARTIN**

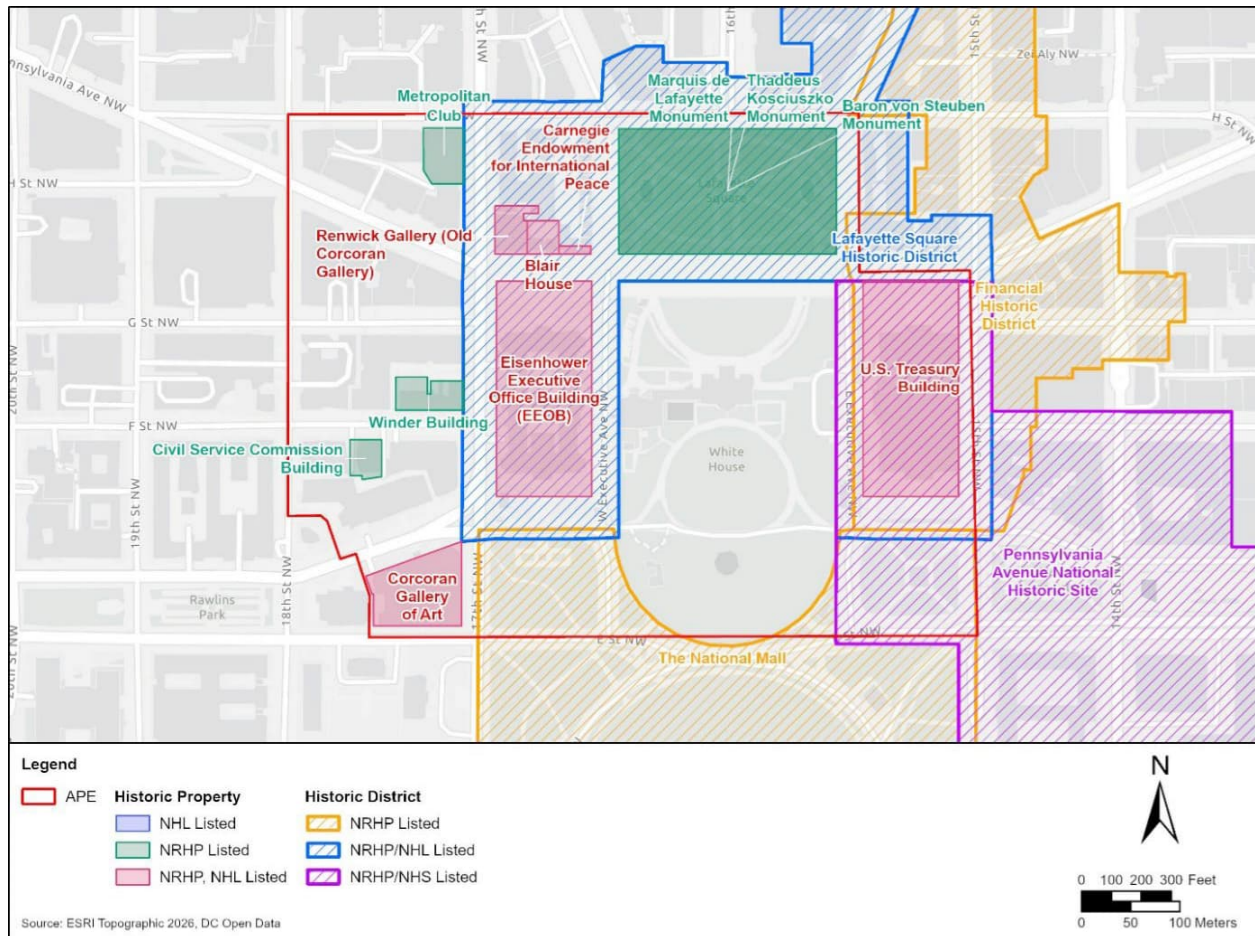
Digitally signed by
HEATHER MARTIN
Date: 2026.07.15
10:31:49 -04'00'

Heather Martin

Deputy Assistant to the President
Deputy Director and Chief Financial Officer
Office of Administration

Attachments: Draft Map of Area of Potential Effects

Attachment A





August 14, 2026

Ms. Heather Martin
Deputy Assistant to the President
Office of Administration
Executive Office of the President
Washington, DC 20503

RE: Initiation of Consultation on Painting of the Eisenhower Executive Office Building

Dear Ms. Martin:

Thank you for your letter of July 15, 2026, stating the intention of your office to comply voluntarily with the Section 106 procedures of the National Historic Preservation Act (NHPA) for a proposed project to restore or paint the facades of the Eisenhower Executive Office Building (EEOB). Your letter states that your office will assume that the DC State Historic Preservation Officer (SHPO) declines to consult on the project in accordance with our communication of January 22, 2026, unless you hear otherwise within 30 days. That message conveyed our understanding that the EEOB was not subject to the provisions of NHPA since it was part of the White House grounds, based upon a brief contact about the matter with the Advisory Council on Historic Preservation.

We have since become aware of information suggesting that the EEOB may, in fact, be subject to NHPA because it is not part of the White House grounds as legally defined. Given this information, we intend to discharge our Section 106 responsibilities by participating in consultation on this proposal.

We look forward to working with you on this undertaking as the consultation process moves forward.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David Wadsworth', is written over a light blue horizontal line.

David Wadsworth
State Historic Preservation Officer

From: [Martin, Heather D. EOP/OA](#)
To: ["Maloney, David \(OP\)"](#)
Cc: [Reid Nelson](#); [Jaime Loichinger](#); [Hunter, Caroline C. EOP/OA](#); [Mendoza, Andrew G. EOP/OA](#)
Subject: RE: Introduction
Date: Friday, September 11, 2026 3:05:12 PM
Attachments: [image001.png](#)

Dear Mr. Maloney,

Thank you for your response and for agreeing to consult with the Office of Administration on improvements to the exterior of the Eisenhower Executive Office Building (EEOB). As you are aware, my July 15, 2026 letter to the DC State Historic Preservation Office (DC SHPO) identified a draft area of potential effects (APE) and provided a listing of the historic properties contained therein. Consistent with the Section 106 regulations and, in particular 36 C.F.R. 800.4, I respectfully request your views on the draft APE and whether any additional historic properties should be included as part of the Section 106 process. In addition, please advise us of any consulting parties which, in your opinion, should be invited to participate in the process.

Given that DC SHPO has had notice of the draft APE and list of historic properties since July 15, 2026, I ask that the DC SHPO provide its views on those items within **ten (10) business days** or no later than **September 25, 2026**. If we have not received any comments by that date, OA intends to move forward with the next step of the Section 106 process.

I look forward to your response.

From: Maloney, David (OP) <david.maloney@dc.gov>
Sent: Friday, August 14, 2026 11:38 AM
To: Martin, Heather D. EOP/OA [REDACTED]
Cc: Reid Nelson <rnelson@achp.gov>; Jaime Loichinger <jloichinger@achp.gov>
Subject: Re: Introduction

Dear Ms. Martin,

Thank you for your email of July 15, 2026. Please see the attached reply.

Best regards,
David



David Maloney (he/him/his)
State Historic Preservation Officer • DC Office of Planning
899 North Capitol Street NE, Suite 7100 • Washington, DC 20002
202-442-8850
david.maloney@dc.gov
planning.dc.gov

Telework Day: Tuesdays. I can still be reached via email and phone during these days.
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From: Martin, Heather D. EOP/OA [REDACTED]
Sent: Wednesday, July 15, 2026 5:35 PM

To: Maloney, David (OP) <david.maloney@dc.gov>

Subject: RE: Introduction

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Dear Mr. Maloney,

As noted in the attached letter, you informed me on January 22, 2026, that the EEOB is not subject to the consultation requirements of the NHPA. Nevertheless, we are moving forward with the NHPA consultation process and I wanted to let you know.

Thank you,
Heather Martin

From: Maloney, David (OP) <david.maloney@dc.gov>

Sent: Friday, January 23, 2026 8:27 AM

To: Martin, Heather D. EOP/OA [REDACTED]

Subject: Re: Introduction

You're welcome!

David Maloney (he/him/his)

State Historic Preservation Officer • DC Office of Planning

899 North Capitol Street NE, Suite 7100 • Washington, DC 20002

202-442-8850

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From: Martin, Heather D. EOP/OA [REDACTED]
Sent: Thursday, January 22, 2026 1:46 PM
To: Maloney, David (OP) <david.maloney@dc.gov>
Cc: jloichinger@achp.gov <jloichinger@achp.gov>; Lieb, David (OP) <David.Lieb@dc.gov>
Subject: Re: Introduction

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Thank you David, that is what I thought but wanted to double check!
Heather Martin
[REDACTED]

On Jan 22, 2026, at 1:01 PM, Maloney, David (OP) <david.maloney@dc.gov> wrote:

Good afternoon, Ms. Martin.

Thank you for your email. Because the Old Executive Office Building is part of the White House complex, it is not subject to the consultation requirements of the National Historic Preservation Act.

Best regards,
David

<Outlook-0kcj1zyg.png> **David Maloney** (he/him/his)
State Historic Preservation Officer • DC Office of Planning
899 North Capitol Street NE, Suite 7100 • Washington, DC 20002
202-442-8850
david.maloney@dc.gov
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From: Martin, Heather D. EOP/OA [REDACTED]
Sent: Wednesday, January 21, 2026 11:52 AM
To: Maloney, David (OP) <david.maloney@dc.gov>; jloichinger@achp.gov <jloichinger@achp.gov>
Subject: Introduction

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You don't often get email from [REDACTED]. [Learn why this is important](#)

Good afternoon David and Jamie- Kristi Tunstall Williams at GSA gave me your contact information. By way of introduction I am the CFO at the Executive Office of the President. I am hoping to meet at your convenience to discuss plans we have for the Eisenhower Executive Office Building. My phone number is [REDACTED], thank you in advance.

Heather Martin
Deputy Assistant to the President
Deputy Director, Office of Administration
Chief Financial Officer
Executive Office of the President
[REDACTED]

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Appendix B: Elevations

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PROPOSED PAINTING

IN THIS IMAGE WE ILLUSTRATE THE EEOB AS IT WOULD LOOK UPON COMPLETION WITH THE SUPERSTRUCTURE PAINTED WHITE, AND MAINTAINING THE EXISTING GRANITE FOR THE BASEMENT AND SUBBASEMENT.



PROPOSED PAINTING CONT'D

IN THIS IMAGE WE
ILLUSTRATE THE EEOB
AS IT WOULD LOOK
UPON COMPLETION
WITH BOTH THE
SUPERSTRUCTURE AND
THE BASEMENTS ALSO
PAINTED WHITE.



PROPOSED PAINTING CONT'D



PROPOSED PAINTING CONT'D



PROPOSED PAINTING WEST WING VIEW



PROPOSED PAINTING AERIAL VIEW



PROPOSED PAINTING FINAL



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**Appendix C: Assessment of Effects Report for
Exterior Improvements to the Eisenhower Executive Office
Building**

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**Assessment of Effects Report
for
Exterior Improvements to the
Eisenhower Executive Office Building
Washington, D.C. 20006**

**Executive Office of the President
Office of Administration**

October 2026

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1. Introduction

The Office of Administration (OA) in the Executive Office of the President is undertaking a project to restore and beautify the Eisenhower Executive Office Building (EEOB) in Washington, D.C. pursuant to Executive Order 14344, *Making Federal Architecture Beautiful Again*, and to bring it into visual alignment with the neighboring White House (the Project). The EEOB is located at the intersection of 17th Street and Pennsylvania Avenue, NW, where it occupies more than one city block just west of the White House and is fronted by President's Park to the south (**Figure 1**). The building is a functional extension of the White House.

The EEOB is listed on the National Register of Historic Places (NRHP) and is both an individually designated National Historic Landmark (NHL) and a contributing building within the NRHP and NHL designated Lafayette Square Historic District.

Although the Proposed Action would be considered an undertaking under the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108), the United States Government maintains that the EEOB is on the White House grounds and, as a result, is exempt from Sections 106 and 110(f) of the NHPA and the implementing regulations at 36 Code of Federal Regulations (CFR) Part 800 pursuant to Section 107 of the NHPA. Furthermore, OA is not a federal agency and, therefore, not subject to the NHPA. However, OA is voluntarily following NHPA procedures for this Proposed Action because they provide a generally well-understood framework by which to consider potential effects on cultural resources and incorporate input from agencies with special expertise in cultural resources.

1.1 Description of the Project Alternatives

This report provides an assessment of effects for three alternatives under consideration for the exterior improvements. The alternatives under consideration are titled Alternative 1, 2, and 3. Effects resulting from the No Action Alternative are also addressed. The overarching goal of each alternative (except the No Action Alternative) is to improve the exterior appearance of the EEOB and achieve better visual cohesion with other buildings on the White House grounds, particularly the White House. All three alternatives include a program of cleaning, along with the installation of new exterior facade lighting.

Alternative 1 includes cleaning the exterior granite to remove dirt and soiling material on all four exterior elevations to remove unattractive stains and improve the overall public appearance of the building. Described in further detail in Section 5.1, a gentle, conservation-based cleaning approach would be utilized. A similar approach was approved by reviewing agencies and interested parties when the exterior was last cleaned in the early 2000s. Updated exterior façade lighting would include a combination of general flood lighting and accent lighting.

Alternative 2 involves painting the previously unpainted exterior granite walls on all four elevations in a shade of white, with mineral silicate paint to achieve a lighter, visually cleaner overall appearance. Described in further detail in Section 5.2, mineral-based paint was chosen for its breathability and longevity. There are several mineral silicate paint products recommended by their manufacturers for use on historic masonry surfaces, including granite. The courtyard elevations would not be painted. Prior to painting, the exterior walls would be prepared for painting, which would include cleaning, as under Alternative 1, and stone repair implemented in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Façade lighting would also be installed under this alternative.

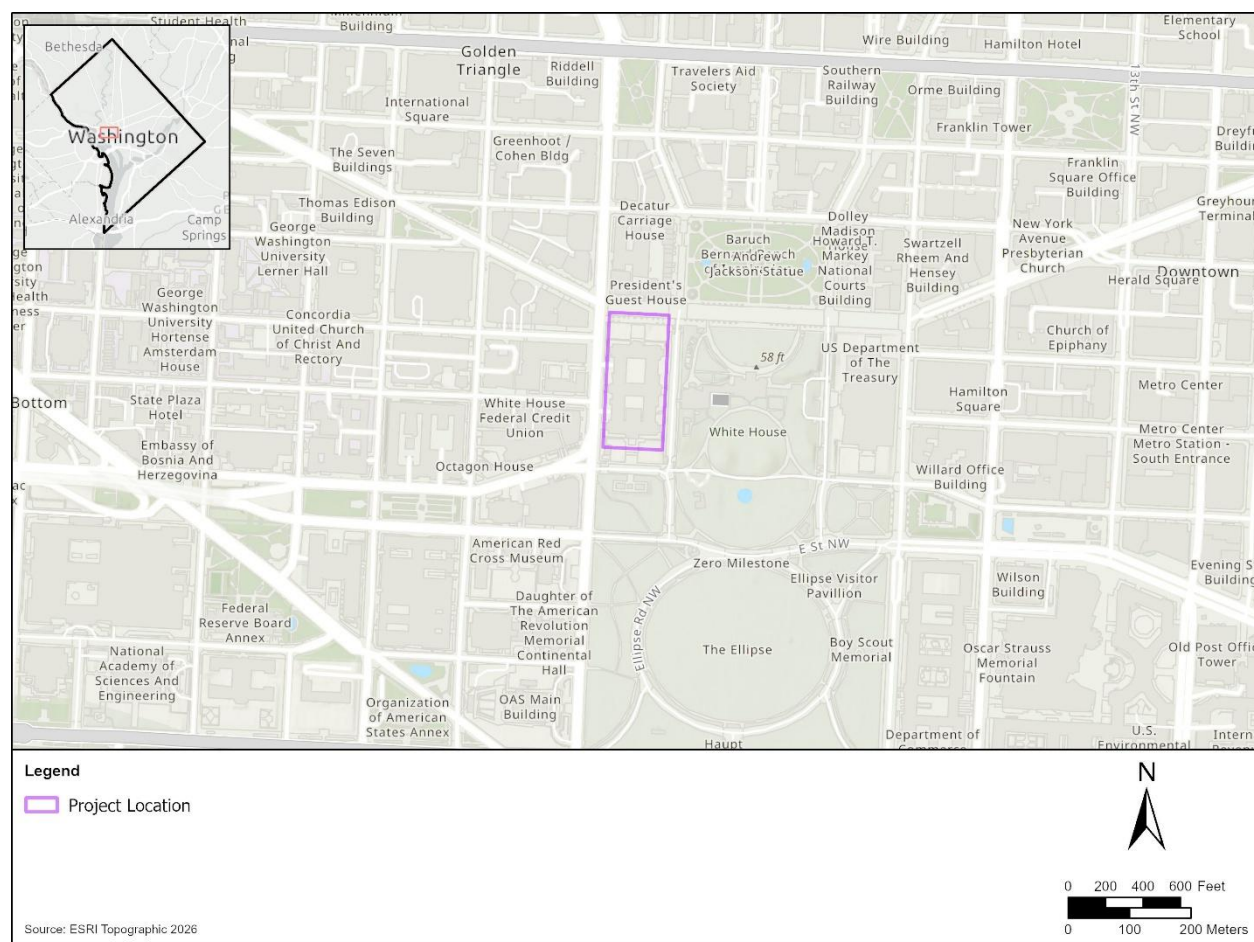


Figure 1. Project location map.

Alternative 3 involves painting the exterior granite walls to the upper floors of all four elevations only, leaving the raised foundation (currently a different type, texture, and shade of granite) unpainted. As with Alternative 2, the paint would be a shade of white, mineral silicate paint, the courtyard elevations would remain unpainted, the exterior walls would undergo cleaning and stone repair prior to painting, and façade lighting would be installed.

Other alternatives considered include acrylic paint. Acrylic paint was not chosen because it is less breathable and potentially more damaging than mineral-based paint on exterior granite.

Existing conditions photographs are enclosed in **Appendix A** and project renderings illustrating existing conditions as well as Alternatives 2 and 3 are enclosed in **Appendix B** of this report.

1.2 Historic Status of the EEOB

Constructed 1871-1888, the EEOB (known originally as the State, War, and Navy Building and subsequently the Old Executive Office Building) was built to house the State, War, and Navy Departments. Based on designs by Alfred B. Mullett, the EEOB stands as one of the best surviving examples of the Second Empire Style in the country (**Figure 2**). A more detailed historical overview of the building's design and evolution is provided in Section 4.1.

Following several threats of demolition in the early to mid-20th century, the EEOB became one of the first listings on the District of Columbia Inventory of Historic Sites in 1964. It was listed on the NRHP (Reference #69000293) on June 4, 1969, for its architectural, military, and political significance. Additionally, it is a contributing building to the Lafayette Square Historic District,

which was added to the NRHP (Reference #70000833) and designated an NHL on August 29, 1970, and is a primary component of the President's Park cultural landscape (National Park Service, 2016). Subsequently, the EEOB was individually designated an NHL on November 11, 1971.



Figure 2. EEOB, south elevation, 2026.

2. Regulatory Framework

The foundational historic preservation law in this country is the NHPA¹, which was established in 1966. The overarching goal of the NHPA is to protect historic resources across the country by ensuring that federal agencies consider potential impacts to historic properties when planning, making decisions, and conducting an undertaking. While the NHPA does not mandate the preservation of historic properties, it acknowledges the importance of preserving our nation's diverse heritage and directs federal agencies to act as responsible stewards of historic properties (ACHP, n.d.). Two sections of the NHPA, Section 106 and Section 110, establish requirements for federal agency programs. As identified in Section 1, OA is not a federal agency; however, for the purposes of this assessment, these NHPA sections will be used to evaluate the Project's impacts to historic properties.

Section 106 (discussed in Section 2.1) requires federal agencies to consider the effects of their actions on historic properties prior to the issuance of any license, permit, approval, or expenditure of federal funds. It also establishes that the Advisory Council on Historic Preservation (ACHP) must have a reasonable opportunity to comment on any federal agency undertaking. The goal of Section 106 is for federal agencies to integrate preservation values into their planning and decision-making processes. Section 110 (discussed in Section 2.2) focuses on federal stewardship of historic properties. It sets out the broad federal historic preservation responsibilities and is intended to ensure that historic preservation is fully integrated into the

¹ The full text of the NHPA is available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>.

ongoing federal agency programs. It also includes a specific provision for the protection of NHLs. Additionally, there are several Executive Orders (discussed in Section 2.3) that address the federal government's responsibilities for historic properties and inform the design of federal architecture, including renovation of building exteriors.

2.1 Section 106

Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties. The NHPA also created the ACHP and authorized them to issue regulations governing the implementation of Section 106 (NPS, n.d.). These regulations are set forth in 36 CFR Part 800². The Section 106 process seeks to incorporate historic preservation principles into project planning through consultation between a Federal agency and other parties with an interest in the effects of the Federal agency's action on historic properties. Section 106 consultation includes four main steps: initiating consultation; identifying historic properties that could be affected by the undertaking; assessing the undertaking's effects on historic properties; and seeking ways to avoid, minimize, or mitigate any adverse effects on those properties.

Section 106 also includes special requirements for considering NHLs in the Section 106 process (36 CFR § 800.10). The regulations require the ACHP and the Secretary of the Interior to be invited to participate in Section 106 consultation whenever a project has an adverse effect on an NHL. For the purposes of this Project, the proposed alternatives will be evaluated under the NHPA, including both Section 106 and Section 110(f).

2.2 Section 110(f)

The guidelines for Section 110(f) of the NHPA (54 U.S.C. § 306107) require "a higher standard of care" when considering undertakings that may directly and adversely affect an NHL. The law requires that agencies, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark." In those cases when an agency's undertaking directly and adversely affects an NHL, or when federal permits, licenses, grants, and other programs and projects under its jurisdiction or carried out by a state or local government pursuant to a federal delegation or approval so affect an NHL, the agency should consider all prudent and feasible alternatives to avoid an adverse effect on the NHL. [Sec. 110(a)(2)(B) and Sec. 110(f)].

As an individually designated NHL within an NHL historic district, the EEOB is subject to Section 110(f).

2.3 Executive Orders

Executive Order (EO) 11593 - Protection and enhancement of the cultural environment (1971) imposes additional responsibilities on federal agencies with respect to historic properties. Specifically, it requires federal agencies to operate their policies, plans, and programs so that federally owned or controlled sites, structures, and objects of historical, architectural, or archeological significance are "preserved, restored, and maintained." In addition, federal agencies are required to take necessary measures to provide for the maintenance and planning of federally owned property listed in the NRHP, including the preservation, rehabilitation, and restoration of such sites (National Archives, n.d. – a). Most of the requirements of this order are reiterated within the provisions of the NHPA.

² The full text of 36 CFR Part 800 – Protection of Historic Properties, is available at <https://www.achp.gov/sites/default/files/regulations/2017-02/regs-rev04.pdf>.

EO on Promoting Beautiful Federal Civic Architecture (2020) establishes criteria for federal building designs that promotes a classical or traditional architectural language, includes community input, and requires federal buildings to be easily identified as such. For renovations, Section 2(c) of the EO states that, “[w]hen renovating, reducing, or expanding applicable Federal public buildings that do not meet the criteria...the feasibility and potential expense of building redesign to meet those criteria should be examined. Where feasible and economical, such redesign should be given substantial consideration, especially with regard to the building’s exterior” (National Archives, n.d. – b).

3. Area of Potential Effects

Section 106 requires the determination and documentation of the Area of Potential Effects (APE). The APE is defined in 36 CFR § 800.16(d) as “the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The APE for the Project is bounded by 18th Street, NW to the west, E Street, NW to the south, 15th Street, NW and Lafayette Square to the east, and H Street, NW to the north (**Figure 3**). The APE boundaries reflect the outer limits from which views toward the property may reasonably generate adverse effects and include views and viewsheds from the surrounding area to the EEOB. Distant views primarily of the EEOB’s roof only were generally excluded from the APE.

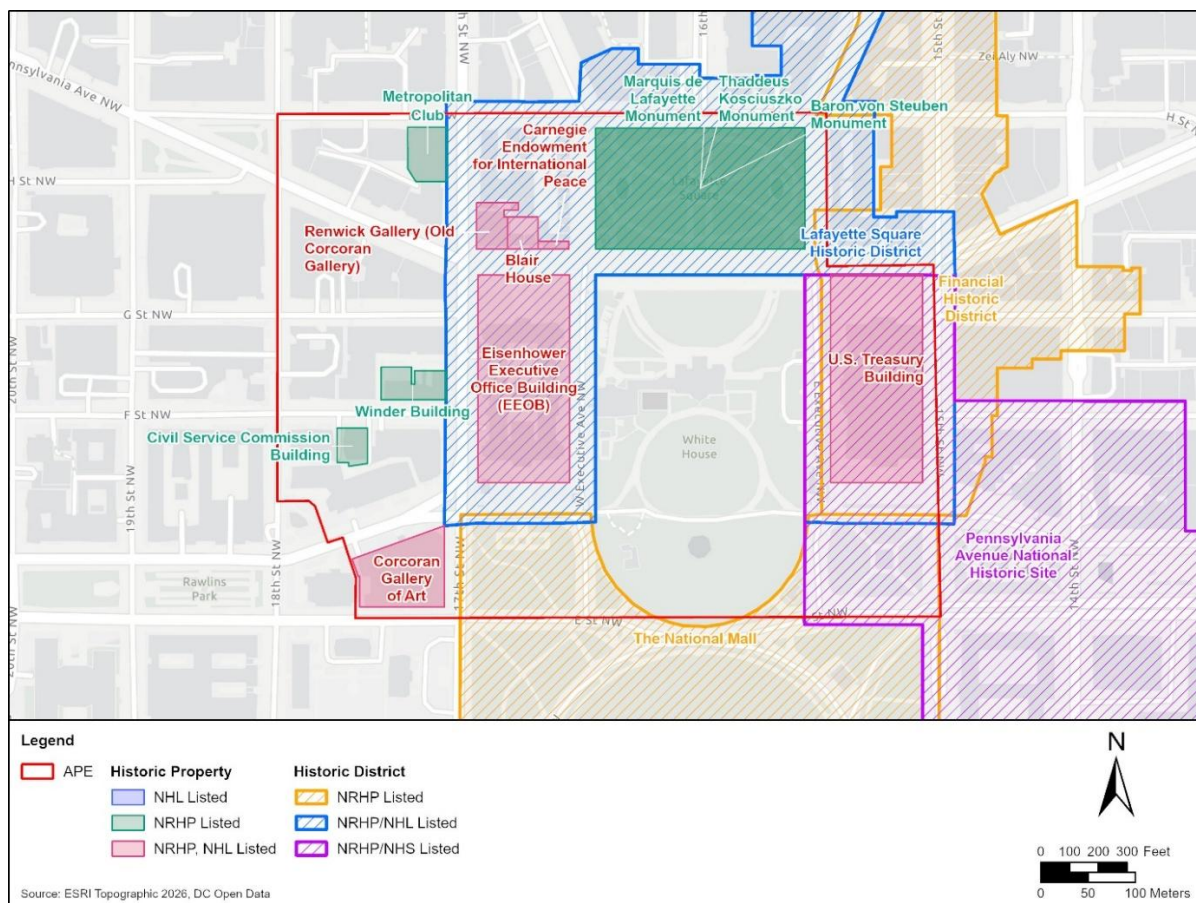


Figure 3. Area of Potential Effects (APE) map.

4. Historic Properties Within the Area of Potential Effects

Historic properties within the APE were identified utilizing online databases including the NRHP, D.C. Office of Planning's PropertyQuest and HistoryQuest, Open Data D.C., and the D.C. Inventory of Historic Sites. The project area is within the District's federal core and thus has been well documented through historic resources surveys. Additionally, a site visit to confirm visibility of the building's main exterior floors from surrounding streets was conducted by a team of qualified Architectural Historians on February 27, 2026.

In addition to the EEOB, discussed in detail in Section 4.1 below, the APE includes eight individually listed resources – five of which are also NHLs. The APE also includes a significant portion of the Lafayette Square Historic District (also an NHL) and smaller portions of two NRHP-listed historic districts and one National Historic Site (NHS). A summary of the other historic properties in the APE is included under Section 4.2. Photographs of the EEOB and other properties in the APE can be found in **Appendix A**.

4.1 Eisenhower Executive Office Building (EEOB)

4.1.1 Original Design and Construction

Commissioning the EEOB

In 1798, before the White House was complete, construction began on executive office buildings flanking the Executive Residence to house the Treasury, State, War, and Navy Departments. The location, first proposed by George Washington, was selected to ease daily government operations. By 1816, two additional office buildings were commissioned to accommodate the growing bureaucracy of the new nation, but it didn't take long for the departments to outgrow these buildings as well, prompting discussions of replacement or expansion of the offices (United States Executive Office of the President [USEOP], 1984).

Following an 1833 fire, Robert Mills was commissioned to design a new fireproof building for the Treasury Department, and the U.S. Treasury Building was constructed from 1836 to 1842. Plans were simultaneously made for additional new construction to house the other departments, but it would take nearly 30 years for these plans to come to fruition. The design process was first interrupted by the Mexican-American War in the late 1840s. When attention returned to the building plans sometime around 1852, the proposed architect, Thomas U. Walter, submitted a plan for a large rectangular building to complement the new Treasury building; however, Walter's plans were cancelled due to the outbreak of the Civil War. It was not until 1869 that the process resumed and Congress finally appointed a commission to select a site for the new building (USEOP, 1984). In January of 1870, the commission, which included the secretaries of State, War, and Navy, selected Lafayette Square as the optimal site for the new building, citing its proximity to the Executive Residence and other public buildings, and the importance of the surrounding neighborhood to the State Department (Report of the Commission, 1870).

On March 3, 1871, the 41st Congress of the United States commissioned a new building for the State, War, and Navy Departments to be constructed "under the direction of the Secretary of State." The act appropriated \$500,000 for the project and stipulated that the new building "be similar in the ground plan and dimension to the Treasury building," and dictated that the Committees of Public Buildings and Grounds of the Senate and House of Representatives may determine the kind of stone to be used (U.S. Congress, 1871). The following month, the Senate

Committee on Public Buildings and Grounds passed a resolution that “the said building shall be constructed of granite” (Resolution of the Committee on Public Buildings and Grounds, 1871; **Appendix C**).

The Second Empire Style

Hamilton Fish, Secretary of State placed in charge of the construction project, was a proponent of the French Second Empire Style, leading him to seek out Supervising Architect of the Treasury Alfred B. Mullett (Santoyo, n.d.). Mullett was an experienced designer of the Second Empire style, and as supervising architect beginning in 1866, he utilized the style liberally for civic buildings across the country. Though Mullett initially declined the offer of designing the new State, War, and Navy Building due to a heavy workload, Fish’s repeated attempts to persuade Mullett to accept the project were eventually successful (Santoyo, n.d.).

Like many architects of the 1850s to 1870s, Mullett was inspired by the design of the New Louvre in Paris. Built 1852-1857 under Napoleon III, the new pavilions were designed by Louis Visconti and Hector Lefuel and drew heavily from the Louvre’s existing Pavillon de l’Horloge built during the 17th century. The building utilized ornate decorative details and sculpture, a mansard roof, arches, columns, and pediments and became a quintessential example of the Second Empire style. Following the 1855 Paris Exposition, the style soared to popularity throughout Europe and the United States, becoming an embodiment of the prestige and authority of Napoleon III’s Paris (USEOP, 1984; Luebke, 2018).

In 1859, James Renwick, Jr. designed the Corcoran Gallery (now the Renwick Gallery) just north of the future EEOB building site. As the first major public building utilizing the French Second Empire Style in America, the Renwick Gallery was at that time known as the “American Louvre” (Smithsonian American Art Museum [SAAM], n.d.). The gallery drew attention to Washington, D.C. as a cultural center and popularized the Second Empire style in America. It was followed by Boston City Hall, which became the first civic building to utilize the style in 1861 and greatly influenced Mullett. In the following years, Mullett’s Second Empire government buildings established the style as one not only suitable for, but defining of, civic buildings. As Supervising Architect of the Treasury, Mullett designed over two dozen civic buildings, including six massive buildings in the Second Empire style – City Hall Post Office and Courthouse in New York City, the Post Office and Sub-Treasury Building in Boston, the Old Post Office in St. Louis, the Courthouse and Post Office in Cincinnati, the Courthouse and Post Office in Philadelphia, and the EEOB. Of these, only the Old Post Office in St. Louis and the EEOB remain standing, the rest being demolished in the 20th century (Snell, 1970; SAAM, n.d.; USEOP, 1984).

The use of the Second Empire style for the EEOB was, according to scholars, a deliberate and representative stylistic choice. In its early years, the Government had opted for classical styles for its civic buildings, aligning the new republic with Greek and Roman symbolism and establishing itself as a democratic authority. By the second half of the 19th century, the image which the country sought to reflect had matured and shifted. The country was well-established by this time, having recently survived a civil war. A new, more European architectural style demonstrated to the world that America perceived itself as a world power on equal footing with European powers (Santoyo, n.d.).



Figure 4: South elevation of the EEOB shortly after construction, between 1880 and 1897, view northwest (William Henry Jackson, Detroit Publishing Co., Library of Congress).

A Century of Controversy

Mullett prepared plans in accordance with the instructions provided by the Committee of Public Buildings and Grounds, and the plans were approved by members of the board, as well as the secretaries of State, War, and Navy, before construction began in June of 1871. As construction of the building proceeded, however, it was met with criticism from members of Congress, esteemed architects, and members of the public, claiming the plan to have “very serious defects” and be “a failure.” In response, in 1874, the Committee of Public Buildings and Grounds affirmed the building and its design, stating that Mullett had complied with the requirements laid out by Congress, and that the building, when completed, would be “a credit to the Government” and “an ornament to the city of Washington” (U.S. Congress, 1874).

The controversy over the building’s design continued after its completion. The EEOB was finished in 1888 after 17 years of construction and met with polarized reviews. While the public had received it relatively positively during the period of construction, by the time the building was completed, the Second Empire style had gone out of fashion (USEOP, 1984). In the following decades, more classical styles of architecture returned to favor, and many Victorian-era buildings were demolished in response to evolving tastes. Just as Second Empire buildings fell out of fashion, the Greek-Revival style Treasury Building became increasingly esteemed. Some critics claimed that the EEOB was intended to be a twin of the classical Treasury Building, falsely asserting that Mullett had defied Congress’s intent with his design of the EEOB. Throughout the first half of the 20th century, attempts were repeatedly made to either demolish the EEOB or redesign it with a more classic façade, but these attempts continued to be thwarted by financial issues and contract disputes. In 1957, the EEOB was once again threatened with demolition, with plans to replace it with a larger executive office building. The plan was met with

public backlash and sparked an increased appreciation for the style. In a city dominated by “white temples,” the EEOB served as a “refreshing outcast.” In 1961, the General Services Administration (GSA) announced that the building would “stand indefinitely,” putting an end to decades of threats to the EEOB’s appearance, style, and existence (USEOP, 1984).



Figure 5: South elevation of the EEOB, view north, 2026.

4.1.2 Exterior Materials

Key Character-Defining Features

The EEOB has a high degree of architectural integrity and retains virtually all original exterior architectural features and materials. According to the 1993 Preservation Plan for the EEOB, these original elements and site features are important to the building’s significance, and many are indicated as within the highest zone of significance: Zone 1.³ Zone 1 is reserved for areas rich in architectural finish and detail that exhibit “unique or distinctive qualities, original materials or elements; or representing examples of skilled craftsmanship; or work of a known architect or builder; or associated with a person or event of preeminent importance.” Per the Preservation Plan, “the character and qualities of this zone should be maintained and preserved as the highest priority” (Quinn Evans/Architects, 1993). The key character-defining features (CDFs) on the building exterior include carved granite columns and pilasters, granite cornices, constructed sculpture accentuated by shadows, window architraves and crown mold belt courses, a mansard roof sheathed in slate shingles, ornate cast iron trim, railings, cornices, and chimneys, window and door surrounds, and the exterior granite walls. As a monumental predominantly granite building, the EEOB’s exterior granite walls are among the most visible and imposing of its exterior CDFs. The characteristics and the sourcing and selection process of the two varieties of granite used for the EEOB are detailed and contextualized below (Quinn Evans/Architects, 1993).

³ The concept of “zoning” is a commonly used preservation planning and management tool that seeks to identify differences in the degree or magnitude of significance for exterior building areas as well as interior rooms and features. Features in highly significant spaces are typically subject to more stringent preservation standards whereas less significant features and spaces may be allowed a broader range of rehabilitation options.

Granite as a Building Material

Granite is an intrusive igneous rock composed of primarily silicate minerals such as quartz, feldspar, and biotite, and noted for its attractive appearance, durability, and weather-resistance (Grotzinger and Jordan, 2014). Several characteristics shape a stone's resistance to deterioration and performance as a building material, including density, hardness, porosity, water absorption, and mineralogy. Porosity and water absorption determine the ease with which moisture and stains may enter a material. Granite has low porosity and water absorption (less than 1%) when compared to other common building stones such as sandstone and limestone, so it is less easily infiltrated by moisture and more resistant to weathering, staining, and deterioration. Granite also has a higher density, higher compressive strength, and higher abrasion resistance than other common building stones (Hunt, 2005).

Due to its durability, appearance, and strength, granite grew to be a popular building stone in the United States, especially in the 20th century. Though it has been used for monuments and buildings for thousands of years, granite's use in early America was limited by quarrying technology. Stone was split by inserting wood or metal wedges into grooves that had been manually drilled or picked, and softer, easier-to-cut stones such as sandstone and marble were preferred. By the 1830s, stone-cutting technology was advancing, and steam-powered machinery was incorporated, making granite-cutting on a larger scale possible, and more affordable (Luebke, 2018). As architecture in America trended toward more European styles following the American Civil War, granite's popularity climbed, as the stone could achieve the effect of a beautiful, massive, imposing building with sharp corners and requiring minimal maintenance (Shattuck, 1999).

In the early days of Washington, D.C.'s development, Aquia Creek Sandstone was the stone of choice for the City's first public buildings. The local Virginia sandstone was readily available, easily transportable on the Potomac, and easily cut; however, the stone was also of poor quality, as it deteriorated easily, varied in color and hardness, and contained various minerals that easily dissolved and stained the stone. Due to its accessibility and workability, these flaws were overlooked, and the sandstone was used for prominent public buildings including the Treasury Building, parts of the Capitol, and the White House; however, due to the stone's rapid deterioration, it could not be left untreated, and it was ultimately painted, covered with other stones, or replaced (Withington, 1975; Livingston, 2015; Morton III, 1971b). As a result of the repeated poor performance of Aquia Creek Sandstone, and the expanding railroad network that allowed for wider transport of other building materials, the stone was abandoned for public buildings by 1840. In 1839, Congress went so far as to mandate the use of granite or marble for the construction of the U.S. General Post Office (Withington, 1975; Livingston, 2015). By the time Mullett designed the EEOB, granite had become a popular material of choice and had been used for public buildings throughout the country, including many designed by Mullett as the Supervising Architect of the Treasury (Luebke, 2018; Morton III, 1971b; USEOP, 1984).

Granite at the EEOB

Mullett selected two quarries to provide granite for the EEOB – Albert Ordway's Green and Westham Quarry outside of Richmond, Virginia and the Bodwell Granite Company in Vinalhaven, Fox Islands, Maine. He considered a variety of factors when selecting granite quarries to recommend for use at the EEOB to Secretary of State Hamilton Fish. After opening the project to bids from established quarries in the Mid-Atlantic and Northeast, he evaluated the bids based on price, granite quality, and ability to supply adequate stone for the massive building. In evaluating the bids, Mullett was looking for granite to be "sound, durable, of uniform color and good grain, free from discoloring or other foreign substances, and capable of withstanding the action of the elements, and, that has been fully tested by use in buildings, and is from quarries capable of furnishing the quality and quantity desired within one year, and from

which stone has been or is now being used for first class buildings” (Mullett, 1871; Quinn Evans/Architects, 1993; Grindle, 1976).

Drawing from personal experience, granite samples provided by the bidding companies, and visits to the quarries, Mullett compared the bids, providing thorough notes and reasoning along with his recommendations to Secretary Fish. In his evaluation, Mullett found that some granites were only suitable for the basement level, as opposed to the whole structure. He found the Bodwell granite to be pure, even-textured, and from a large and reputable quarry, but wrote that the stone “is not in my opinion of suitable quality for the superstructure of the building.” Of the Green and Wesham Quarry granite, he wrote that “no handsomer or purer granite has been submitted.” He later described the granite as being “of remarkably fine texture and quality,” “undoubtedly free from iron and other discoloring matter,” and “well adapted for the work for which it is to be used.” As the quarry had also been opened and used for many years and would have no problem meeting the supply requirement, Mullett selected it for the superstructure (Mullett, 1871; Mullett, 1872).

As work progressed on the building, Mullett noted the “pleasing contrast” formed between the granite used for the cellar, basement, and courtyard and the granite selected for the superstructure (Mullett, 1872). When questioned by the Committee of Public Buildings and Grounds in 1872 regarding his choice to contract with two separate granite companies, Mullett stated, “The Fox Island granite is darker and coarser than the Richmond material. I think it well adapted to the basement story and will indeed be superior in its appearance, it will be rather a relief to the rest of the building, but I considered it too coarse to be used in the superstructure” (Testimony of A.B. Mullett, 1872).



Figure 6: Detail views of granite from the superstructure of the EEOB (*top left*), the substructure of the EEOB (*top right*), the Treasury Building (*bottom left*), and the Old Post Office (*bottom right*).

The granite for the exterior superstructure of the EEOB was obtained from Albert Ordwell's Green and Westham quarries near Richmond, Virginia. The variety of granite in this location, Petersburg granite, also called Dinwiddie granite, is found in a belt of rock extending from near Ashland, Virginia to near Stony Creek, Virginia. It came into use as a building stone in the 1830s and is characterized as a coarse-grained biotite granite composed of predominantly quartz, plagioclase and potassium feldspar, and biotite, with various accessory and secondary minerals (Carter, 2021; Wright, 1975). This characterization was confirmed by observations of the EEOB building stone, where quartz, feldspar, and biotite are visible without magnification.

This variety of granite from the same region was also utilized at Old City Hall in Richmond, Virginia, an NRHP-listed building, as well as Petersburg City Hall, listed in the NRHP in 1978. Petersburg City Hall, completed in 1859, was originally used as the Customs House and was designed by Ammi B. Young when he served as the first Supervising Architect of the Treasury (Architecture Richmond, 2012; Virginia Department of Historic Resources, 2024).

The granite selected for the basement and subbasement levels of the EEOB was quarried by the Bodwell Granite Company on the island of Vinalhaven, the largest of the Fox Islands located in the Penobscot Bay 15 miles off the coast of Rockland, Maine. The granite from this region is characterized as medium-coarse grained and composed of potash and soda-lime feldspar, quartz, and biotite, with various accessory minerals. Used in the interiors and exteriors of many prominent public and private buildings and structures, it was noted for its strength and weather-resistance, high quality, and unique pink-tinted color, and it was easily transported from the island by boat. Vinalhaven's Bodwell Granite Company was contracted to supply granite for the East River Bridge, the Brooklyn Bridge, the U.S. Postal Department in Washington, D.C., the U.S. Customs House, New York City paving blocks, Chicago and Western Railroad terminal, and many others in the Northeast and Midwest from the mid-19th century to early-20th century (Grindle, 1976; Meander Maine, n.d.; Shattuck, 1999; Rand, 1958).



Figure 7: Granite cutters from Bodwell Granite Company marking the contract for the State, War, and Navy Building (EEOB) (n.d., in Hutton, 2019).

The Old Post Office in Washington, D.C. built between 1893 and 1899, is faced in the same Vinalhaven granite stock as the EEOB (Grindle, 1976). The building was designed by the office of the Supervising Architect of the Treasury under W.J. Edbrooke in the Romanesque Revival style popular in the late 19th century. It is a massive rectangular building particularly noted for its iconic clock tower, a D.C. landmark (Ganschietz and Taylor, 1973). With close inspection, the stone and its minerals appear nearly identical to that of the EEOB.

Other Buildings on the White House Grounds

Buildings part of the White House and grounds have undergone changes in previous centuries for utilitarian purposes. The Executive Residence, built of light gray Aquia Creek Sandstone beginning in 1792, was coated with lime-based whitewash in 1798 to protect the porous stone, earning it the nickname of “the White House.” It was more permanently covered with white lead paint in 1818. The Executive Residence underwent major changes when the north and south porticos were built in 1829, the west wing was added in 1902, and the east wing was built in the 1930s. The exterior walls receive paint touch-ups annually, with full repainting every four to six years to maintain its pristine white facades (Fenton and Poh, 1959; Livingston, 2015; White House Historical Association, n.d.-a, n.d.-b).

The U.S. Treasury Building, located directly east of the White House, is a massive rectangular Greek Revival-style building designed by Robert Mills. The original central wing and west façade were built from 1836 to 1842 of Aquia Creek Sandstone, despite Mills’ preference for granite, due to financial constraints from Congress. The west, north, and south wings of the building were constructed between 1855 and 1869, this time using granite. In 1908, Mills’ original east façade was rebuilt in granite to match the rest of the building (Morton III, 1971b). The granite for the Treasury Building was quarried primarily from Dix Island, Maine, as well as Milford, Massachusetts, and is classified as a dark gray biotite granite of medium to coarse grain (Withington, 1975; Rand, 1958).

4.1.3 Previous Restoration Efforts

Though the EEOB was threatened with major alterations in the early 20th century, as well as with demolition in the 1950s, the building’s exterior has remained essentially unchanged since its construction, in part thanks to preservation efforts (Taylor, 1969a). In restoration efforts over the last sixty years, the Secretary of the Interior’s (SOI) Standards have been utilized to ensure protection and preservation of the EEOB’s historic integrity, materials, and designations. For example, when GSA invested \$150,000 to clean the EEOB’s exterior in 1960, they followed the advice of the Commission of Fine Arts (CFA) to “launder – but don’t scour” the granite walls (Luebke, 2018).

The first major restoration of the EEOB began in the 1980s under the Reagan administration. Spearheaded by assistant-to-the-president John F.W. Rogers with a mandate from President Reagan, the project focused on the EEOB’s illustrious interiors, as well as the development of five- and ten-year plans for the preservation and functional improvement of the building. The restoration team kept reversibility in mind as they approached their work, weighing “preservation purity and practicality” (Luebke, 2018; McLaurin, 2023). The effort continued in 1985, when the GSA hired NPS staff to conduct a study of the building, which included a paint analysis, review of archival photos and records, and documentation (Executive Office of the President, 2007). This work fostered an appreciation for the building, prompting the initiation of a tour program to share the restoration with the public (Luebke, 2018).

In the 1990s, the GSA commissioned a building evaluation and exterior restoration, which was guided by a 1990 building condition report (Executive Office of the President, 2007; Howard Needles Tammen & Bergendoff, 1990). The restoration project, which used the Section 106

review process, included a roof replacement, exterior repairs, and window and door treatment. A 1993 Preservation Plan generated for the GSA further affirmed the EEOB's significance and historic integrity, labeling it as a Class 1 building, a category reserved for "highly distinctive and unique" buildings and NHLs. This system of classification is applied to GSA properties as a management tool for cultural resources (Quinn Evans/Architects, 1993).

A three-phased modernization project began in 2004, which made an effort to preserve and restore the building's original materials. The EEOB underwent a full systems upgrade, repair and cleaning of exterior masonry, and replacement of doors and window sashes. As part of the modernization, GSA determined that the EEOB was excluded from the Section 106 process as part of the White House Complex (National Capital Planning Commission, 2008; Executive Office of the President, 2007).

4.2 Other Historic Properties in the APE

4.2.1 Lafayette Square Historic District

Includes portions of H Street and Pennsylvania Avenue around Lafayette Square, NW, bound by 17th Street to the west and 15th Street to the east.
NRHP, 1970; NHL 1970

The centerpiece of the Lafayette Square Historic District is Lafayette Square, a nearly seven-acre landscape designed by Andrew Jackson Downing that includes contributing monuments, paths, plantings, fences, and lighting. Surrounding the park are some of the federal core's most significant buildings, the majority of which illustrate a relationship to the federal government and its power and influence. Early federal residences within the district include the Stephen Decatur House, Dolly Madison House, and Blair House. Also included are buildings where important organizations were founded, such as the Renwick Gallery and National Savings and Trust Company Building. Key contributing governmental buildings in the district include the U.S. Treasury Department, Chamber of Commerce Building, and the EEOB. The district includes approximately 26 contributing properties (McDermott, 1970; D.C. HPO).

4.2.2 Corcoran Gallery of Art

1700 New York Avenue, NW
NRHP, 1971 (updated 2012); NHL, 1992

The Corcoran Gallery of Art is a three-story, Beaux Arts-style building constructed between 1894 and 1897 on the west side of 17th Street, NW between E Street and New York Avenue, NW. Its main entrance and character-defining curved wall faces 17th Street and the EEOB and White House grounds/President's Park. Both the exterior and interior are significant as one of the best examples of French Beaux Arts architecture and spatial planning in Washington, D.C. It is listed on the NRHP under National Register Criteria A and C and with a national level of significance (Alderson, 1991; Sefton and DeFerrari, 2012).

4.2.3 Civil Service Commission Building

1724 F Street, NW
NRHP, 2013

Completed in 1911, the Civil Service Commission building is a six-story structure that served as the headquarters of the U.S. Civil Service Commission from 1911 to 1932. Located mid-block and facing north on F Street, NW, the façade of the property includes views toward the EEOB's west side. It is significant as an early 20th century federal office building constructed with private

funds, and noted as an excellent example of the Italian Renaissance Revival style designed by noted architect Appleton P. Clark, Jr. It is listed on the NRHP under National Register Criteria A and C and with a local level of significance (Young, 2013).

4.2.4 Winder Building

604 17th Street, NW
NRHP, 1969

The Winder Building is a substantial structure located on the west side of 17th Street directly across from the EEOB's west pavilion and entrance. It stands five stories in height and includes a raised basement and painted brick walls. Constructed between 1847 and 1848 and designed as a government building, it is one of the few surviving pre-Civil War office buildings in Washington, D.C. Prior to the construction of the EEOB, the Winder Building was used by the War and Navy Departments. It is listed on the NRHP for its military and governmental significance at the national level (Taylor, 1969b).

4.2.5 Metropolitan Club

1700 H Street, NW
NRHP, 1995

Constructed in 1908, the Metropolitan Club was Washington, D.C.'s first literary and social club for men. The building sits at the southwest corner of the intersection of 17th and H Streets, NW. Its membership included political appointees and important businessmen and is noted for its location near many key governmental buildings, including the EEOB, though it has limited views of the building due to its location a full block to the north. Constructed of buff brick and limestone, it is a good example of the Renaissance Revival style. It is listed on the NRHP under National Register Criteria C with a statewide level of significance (Barsoum, 1995).

4.2.6 Renwick Gallery (Old Corcoran Gallery)

1661 Pennsylvania Avenue, NW
NRHP, 1969; NHL 1971; within Lafayette Square HD

Built 1859-1864 and designed by renowned architect James Renwick, Jr., the building originally housed the Corcoran collection of American and European art. The building sits in a prominent and highly visible location at the corner of 17th Street and Pennsylvania Avenue, NE, facing the EEOB's north elevation. It features a highly ornate exterior with red brick, sandstone trim, and steep mansard roofs with cresting. It is listed on the NRHP for its architectural significance at the national level (Morton III, 1971a).

4.2.7 Blair House

1651-53 Pennsylvania Avenue, NW
NRHP, 1966; NHL 1937; within Lafayette Square HD

The 1824 Blair House and its three adjacent 19th century rowhouses are significant for their federal and early 19th century architecture as well as their association with numerous important historical events, including their role as the President's official guest house since the 1940s. The Blair House complex is located on Pennsylvania Avenue adjacent to the Renwick Gallery. It sits directly across from the EEOB's north side. Blair House became the first building to be federally recognized as a landmark in 1937. It is listed on the NRHP for its architectural significance at the national level (Levy, 1973).

4.2.8 Carnegie Endowment for International Peace

700 Jackson Place, NW

NRHP, 1974; NHL 1974; within Lafayette Square HD

Known today as the Peter Parker House, the Carnegie Endowment for International Peace building was constructed as a private dwelling in 1860. It is situated just east of Blair House at the corner of Pennsylvania Avenue and Jackson Place, NW. Facing east, its side (south) elevation faces the EEOB. The building later served as the headquarters for the Carnegie Endowment from 1910 until 1948. It is representative of the typical, red brick Washington, D.C. rowhouse type with cast iron and sandstone Italianate style details. It was internally combined with the Blair House in the early 1980s and now serves as additional guest space for the President. It is listed on the NRHP for its social and humanitarian significance at the national level (Poh, 1973).

4.2.9 U.S. Treasury Building

1500 Pennsylvania Avenue, NW

NRHP, 1971; NHL 1971; within the Lafayette Square and Financial HDs; within the Pennsylvania Avenue NHS

The Treasury building was constructed between 1836 and 1869 to house the federal government's Treasury Department. Along with the EEOB, it flanks the White House on the east side and extends more than a block along the Fifteenth Street streetscape. It was built over the course of several decades and is the result of designs by five major architects, including Alfred B. Mullet (architect of the EEOB). Along with the nearby Patent Office, the Treasury building stands as "one of the best examples of Greek Revival civil architecture in the country" (Morton III, 1971b). It is listed on the NRHP for its architectural, political, and historical significance at the national level.

4.2.10 Financial Historic District

15th Street from Pennsylvania Avenue, NW on the south to K Street, NW on the north

NRHP, 2006 (amended 2016)

The Financial Historic District is a largely linear historic district that extends along 15th Street from the U.S. Treasury Building at Pennsylvania Avenue on the south to the north side of K Street on its northern end. The district contains 36 contributing buildings, including the Treasury building. The district includes excellent and monumentally scaled examples of 19th and early 20th century classical and revival-style bank and office buildings. Many of the buildings are designed by major architects, including Daniel Burnham and the firms of York and Sawyer as well as Carrere & Hastings. The district is listed on the NRHP under National Register Criteria A and C with a local level of significance (Williams, 2016).

4.2.11 Pennsylvania Avenue National Historic Site

Pennsylvania Avenue, NW, bounded by Constitution Avenue, 15th, F, and 3rd Streets

NRHP 1966 (amended 2007); NHS, 1966

The Pennsylvania Avenue National Historic Site (NHS) is the historic ceremonial route for the Presidential inaugural parade. It is a largely linear historic district that extends the broad, radiating Pennsylvania Avenue between the White House and Capitol, including a large portion of the federal and local governmental cores. The site includes many nationally important buildings such as the U.S. Treasury Building, Ford's Theater, and the Old Patent Office as well as numerous features and elements of the 1791 L'Enfant Plan. In total, the site includes 111

contributing resources. The APE intersects a very small portion of the site's westernmost edge to include the Treasury building. The EEOB is not within its boundaries and views of the EEOB to and from the site are distant. The site is listed on the NRHP under National Register Criteria A and C (D.C. HPO).

4.2.12 National Mall Historic District

*Includes the National Mall from 14th Street to the Capitol Grounds
NRHP 1966 (amended 2016)*

The National Mall Historic District is one of the country's earliest and most significant designed landscapes and a major element of the 1791 L'Enfant Plan and 1901-02 McMillan Plan for the City of Washington. It contains 110 contributing resources, including many nationally significant buildings, sites, structures, objects, and landscapes. The district includes the historic mall, Washington Monument and U.S. Capitol grounds, President's Park South, and the many museums and institutions that line the historic mall. While the APE includes a small portion of the district's northern side, the EEOB was intentionally excluded from the district because it does not "contribute to the historic extent and design of the National Mall." The district is listed on the NRHP under National Register Criteria A, C, and D at the national level (D.C. HPO).

5. Identification of Effects

Effects assessments are based on the criteria of adverse effect as defined in the ACHP regulations (36 CFR § 800.5). The criteria of adverse effect are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative (36 CFR § 800.5(a)(1)).

Examples of adverse effects can include physical destruction or damage to all or part of a property; alterations, including restoration, rehabilitation, and repair, that are inconsistent with the *Secretary's Standards for the Treatment of Historic Properties*⁴ and applicable guidelines; and change of the character of the property's use or of physical features within the property's setting that contribute to its significance (36 CFR § 800.5(a)(2)). For the purposes of this analysis, to assess whether the proposed alternatives might result in a change to the character of a property's setting, feeling, or association for the other historic properties in the APE, available documentation such as NRHP nominations were reviewed to determine if 1) the property had a historical and sustained functional or governmental relationship with the EEOB, or 2) the property's setting with views of the EEOB are a key characteristic feature.

To assess Project effects, Architectural Historians meeting the *Secretary of the Interior's Professional Qualification Standards*⁵ conducted a site visit and reviewed existing documentation on the history and significance of each property. With an understanding of each property's significance, characteristics, and integrity, qualified Architectural Historians analyzed

⁴ See <https://nps.gov/orgs/1739/secretary-standards-treatment-historic-properties.htm>

⁵ See <https://www.nps.gov/articles/sec-standards-prof-quals.htm>

the proposed alternatives and applied the criteria of adverse effects. A finding of “**no historic properties affected**,” “**no adverse effect**,” or “**adverse effect**” is recommended for each historic property:

- **No Historic Properties Affected:** A finding of “no historic properties affected” signifies that the Project would not affect the characteristics of the property that qualify it for NRHP listing.
- **No Adverse Effect:** A finding of “no adverse effect” per 36 CFR § 800.5(b) signifies that effect(s) would not alter a characteristic of a property that qualifies it for inclusion in the NRHP in a manner that would diminish the integrity of the property; it does not meet the criteria for adverse effect.
- **Adverse Effect:** A finding of “adverse effect” per 36 CFR § 800.5(a)(1) signifies that an effect(s) would alter a characteristic of a property that qualifies it for inclusion in the NRHP in a manner that would diminish the integrity of the property, per the criteria for adverse effect.

The following analysis is an assessment of effects of each alternative on NRHP-eligible or listed historic properties and is based upon the criteria of adverse effect. Consistency with Section 110(f) is addressed in **Table 1**. Within each alternative, the first section addresses direct and indirect effects on the subject property (EEOB) and the second section addresses other historic properties in the APE. These effects are also summarized in **Table 1**.

5.1 Alternative 1: Exterior Cleaning and Lighting

The EEOB exhibits several conditions that may warrant cleaning at this time and may likewise serve to improve the overall appearance of the building’s exterior. These conditions include gypsum salt accumulation, efflorescence, bird guano stains, oxidation stains, and biological growth. General soiling is also apparent throughout the building, especially on horizontal surfaces such as window sills, ledges, string courses, and cornices. Some of these conditions may cause deterioration over time if left untreated on the building surface. Effectiveness of cleaning methodologies may vary depending upon condition being treated and severity of soiling, so multiple cleaning methodologies may be applied to the building. Cleaning methodology may also vary depending upon building features. More ornate areas, such as delicate carvings and sculptures, may require gentler cleaning methods. Different methodologies may also be needed to target crevices and hard-to-reach areas of sculptural features (Grimmer, 1988).

The preferred cleaning method for the granite at EEOB would be water and a soft bristle brush. Acidic or alkaline chemical cleaners may be utilized, if needed, following GSA and NPS guidelines and best practices (referred to herein as a “conservation-based” approach) (GSA, 2016). Granite is considered a non-acid-sensitive stone, and as such, acid-based chemical cleaners may be considered (however, not all acidic cleaners are appropriate for historic buildings). Alkaline, or basic, cleaners may also be considered for granite, though they may not prove as effective as acidic cleaners. Both acidic and alkaline cleaners pose hazards to historic masonry, as they may leave behind damaging salts, stains, or deposits, dissolve lime-based mortar, or burn the masonry surface (Mack and Grimmer, 2000). Thus, these more aggressive methods would only be undertaken where necessary and only after completing field testing and mockups with review by a qualified Architectural Conservator.



Figure 8: Moisture retention and efflorescence on pavilion ceiling of EEOB, 2026.



Figure 9: Gypsum salt accumulation in covered pavilion of EEOB, 2026.

In addition, updated exterior lighting would be implemented to further enhance the building's exterior appearance and highlight the newly cleaned walls through a layered approach consisting of general flood lighting and building-mounted accent lighting. The type of light would be clear, and the intensity would be appropriate for a monumental building in the downtown core. Building-mounted fixtures would be largely concealed behind building elements such as cornices and parapets or screened with landscaping. A detailed lighting plan would be developed during final design that would provide details such as existing fixtures to be removed, the number and location of new fixtures, intensity of light, equipment, and installation method.

5.1.1 Effects Analysis

As a durable, weather resistant stone, granite is not recommended for frequent cleaning. In general, cleaning is only recommended on masonry to halt deterioration or to remove heavy soiling and is not recommended for the purpose of creating a "like-new" appearance on a historic building, so as not to introduce unnecessary chemicals and moisture into the substrate. When cleaning is undertaken, it should be by the gentlest means possible (Grimmer, 2017; GSA, 2016). Before a cleaning method is selected and building-wide cleaning is performed, test

panels are essential to evaluate both the efficacy of the method and the effect upon the substrate, ensuring no damage is done to the stone or mortar (Mack and Grimmer, 2000). It is also important to plan cleaning when environmental conditions are appropriate, when there is no possibility of freezing temperatures, and ideally when temperatures are not too high (Grimmer, 1988).

Under this alternative, cleaning the exterior granite by strictly following a conservation-based approach, and using the gentlest means possible, would generally not result in damage of historic fabric or diminish the building's integrity of design, materials, workmanship, setting, feeling, and association. Appropriate, gentle cleaning methods at soiled areas of the building, combined with the use of test panels to evaluate various cleaning methods before they are applied consistently, would have an overall beneficial effect on the building by removing soiling, stains, and biological growth that could be harmful if left untreated over the long term.

Specifications have not yet been fully developed, but methods to be tested may include water with a soft bristle brush, and an alkaline cleaner approved for historic buildings, if necessary. It is anticipated that once an appropriate, conservation-based method has been selected and reviewed by the National Capital Planning Commission's (NCPC), the Department of Interior (DOI), ACHP, GSA and other consulting parties, cleaning would not result in adverse effects.

New façade lighting is not expected to create adverse effects provided installation does not damage historic fabric and the detailed lighting plan to be developed during final design is consistent with GSA guidelines for the upgrading of historic building lighting as well as the NCPC's lighting policy and framework. A more robust lighting approach than the current scheme is reasonable for a monumental building in the downtown core.

As a result, Alternative 1 would result in no adverse effect to the EEOB and a finding of no historic properties affected on the other historic properties in the APE (**Table 1**).



Figure 10: Soiling on granite window sill on east elevation of EEOB, 2026.



Figure 11: Soiling and bird guano on north elevation of EEOB, 2026.

5.2 Alternative 2: Exterior Painting

This alternative involves painting the previously unpainted exterior granite walls on all four elevations in a shade of white, with mineral silicate paint to achieve a lighter, visually cleaner overall appearance (**Appendix B**). The courtyard elevations would not be painted. A mineral-based paint was chosen for its breathability and longevity. The façade lighting described in Alternative 1 (Section 5.1) would also occur under this alternative.

While specifications have not yet been finalized, this alternative would ensure proper surface preparation before the coating is applied. Surface preparation would include repointing of deteriorated mortar, sealant replacement, stone crack and dutchmen repair, and in-kind stone replacement for isolated granite units beyond repair. Biological growth would be killed and removed, and the building would be cleaned in accordance with guidelines and methodology outlined in Alternative 1. The building surfaces would be given adequate time to dry thoroughly to moisture levels no greater than 18% by volume to ensure the paint can properly adhere to and bond with the substrate (Keim, n.d. – a). At EEOB, specific conditions to be addressed would include dampness, biological growth, soiling, staining, efflorescence, cracks, man-made holes, or other minor physical deterioration requiring repair. Prior to painting, the selected paint would be tested to confirm the application method and ensure proper adhesion and the appropriate number of coats. Additionally, previously painted elements, such as the cast iron chimneys, sculptures, cornices, railings, and roof trim, would be cleaned and repainted in-kind. Following painting, an annual cleaning regimen, consistent with White House regimen, would be employed.

Mineral silicate paints are advertised as highly breathable and durable wall coatings that are composed of natural minerals and potassium silicate. There are several manufacturers of high-quality mineral silicate paints that have been used on historic buildings and masonry, including BEECK and Keim.

BEECK Beeckosil (available in a fine or coarse finish) is an active mineral silicate paint with an optional BEECK +P photocatalytic additive to reduce air pollution (BEECK, 2021). The paint is recommended by the manufacturer for use on natural stone and is strongly alkaline with a pH of 11, UV-stable, weather resistant, and highly vapor permeable (75 to 85 perms), making moisture

entrapment below the paint surface unlikely. BEECK's formulation is composed of pure mineral potassium water glass and mineral pigment and is advertised as producing a "uniform and inseparable bond" with the substrate (BEECK, 2017). The White House is currently coated with BEECK mineral silicate paint.

Keim Soldalit® ME, a photocatalytic sol-silicate exterior paint, is a self-cleaning mineral silicate finish that prevents infiltration from air pollutants, as well as fungal and biological growth. The paint, which is recommended by the manufacturer for use on stone masonry, is strongly alkaline with a pH of 11, compatible with other mineral paints, water repellent, and highly vapor permeable (77 perms), decreasing the likelihood of moisture entrapment below the paint surface. Keim Soldalit® ME is composed of silica-sol, potassium silicate binders, mineral pigments, and an acrylate copolymer. It is advertised as resulting in a "permanent," UV-stable, weatherproof bond that will not crack or flake (Keim, n.d. – b, n.d. – c).

From a longevity standpoint, both BEECK and Keim mineral silicate paints bond with the underlying masonry, providing a coating that is extremely durable and resistant to external stressors such as acid rain, pollution, UV light, and harsh weather. Both manufacturers market their mineral silicate paints as permanent. However, these paints interact with the substrate differently based on the properties of the material. For example, the paint is more compatible with calciferous and highly porous masonry (such as limestone and brick) than denser, less porous masonry (such as granite). Testing of mineral silicate paint performance on granite, particularly previously unpainted granite, is not widely available. Technical data and instructions available from the manufacturers suggest conducting a trial or test area to ensure effectiveness. As such, OA has completed initial testing of both the adhesion and removability of this paint on the specific type of stone used in the EEOB. The initial findings indicate the paint's adhesion is adequate and comparable to other types of post-applied exterior surface coatings.

5.2.1 Effects Analysis

The granite at EEOB has never been previously painted. The stone appears to be in sound condition throughout the building, with various areas possessing some cracking, loss, flaking, or erosion visible from ground level.

As a compact stone, granite has low porosity, which contributes to its durability and weather resistance; however, this characteristic can also make adhesion and penetration of surface coatings a challenge (Gherardi, 2022). Thus, proper surface preparation activities, including cleaning, repointing, crack repair, and sealant replacement, would follow the previous exterior restoration effort's means and methods and be based upon the recommendations in the Historic Structure Report and consistent with the SOI Standards. It is anticipated that detailed specifications for surface preparation would be reviewed by the NCPC, DOI, ACHP, GSA and other consulting parties.

Painting or applying coatings to previously unpainted or uncoated historic buildings is generally not recommended, per the SOI Standards, as these buildings have successfully survived thus far without surface treatment. Introducing a new surface coating risks exacerbating existing issues, such as rising damp and salts both on (efflorescence) and below (subflorescence) the masonry surface (Mack and Grimmer, 2000). Water-repellent or waterproof coatings can cause moisture entrapment below the surface of the coating and result in flaking of the stone (GSA, 2016). Because even products advertised as vapor permeable can slightly decrease the breathability of a stone wall, if coating is to be undertaken it is important to select a paint with a high perm value, indicative of high vapor permeance, to minimize moisture entrapment (Mack and Grimmer, 2000).

As mineral silicate paints, Bееckosil and Keim Soldalit® ME have high vapor permeance ratings of 75-85 Perms and 77 Perms, respectively. Standard measures of vapor permeance consider a rating of greater than 10 Perms as “vapor permeable” (Buildingscience.com, 2013). Mineral silicate paints are therefore highly vapor permeable and unlikely to cause significant moisture retention provided any moisture-related issues are addressed before the building is painted. Failing to do so could result in increased surface dampness, the presence of damaging salts, and an inability for the paint to properly adhere to the surface.

In terms of visual impacts, painting would impair historical continuity and diminish the EEOB's value as an exemplar of the French Second Empire architecture style. French Second Empire-style masonry buildings, particularly high-style public buildings, were typically unpainted to showcase the texture, veining, and hues of the raw material. Additionally, painting would disrupt the visual distinction that exists among the buildings flanking the White House. The U.S. Treasury Building (constructed 1836-1869) is likewise an unpainted, light gray stone building, leaving the White House (constructed 1792-1800) as the only white painted building on the grounds for over 225 years.



Figure 12. 1902 painting of Lafayette Square and the White House by Peter Waddell. The EEOB is visible on the right, and the US Treasury Building is on the left (The White House Historical Association, n.d. - c).

This distinction forms part of the essential character, evolution, hierarchy and setting of the White House grounds and immediate surroundings. It also helps to express the L'Enfant plan's 'axis of power' between the White House, National Mall, and the Capitol. The EEOB's relationship with the adjacent cultural landscape, President's Park, is likewise strong due to the open sightlines and vistas from the south and southeast. These vistas could also be adversely affected by a visible change in the building's historic appearance. Refer to the streetscape/context photo sheet in **Appendix A**. As with Alternative 1, conservation-based cleaning of the granite and installation of new façade lighting is not expected to result in adverse effects, provided final plans are consistent with the SOI Standards and reviewed by the NCPC, DOI, ACHP, GSA and other consulting parties.

In terms of reversibility, which is a critical concept in the SOI Standards, the possibility of future removal without the likelihood of damage to the historic building is an important metric to consider when assessing effects to the EEOB. As expressed in Standard 10, “new additions, exterior alterations, or related new construction should be undertaken in a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired” (NPS, 2024). Reversible interventions minimize damage to historic fabric and allow future generations to remove modern changes and restore a building to its original, authentic appearance, if desired.

Testing of removal of mineral silicate paints from natural stone has not been heavily studied. OA has completed initial testing of adhesion and removal via pressure washing of mineral silicate paint applied to granite sourced from the same quarry as the EEOB’s lower-level granite. These initial findings indicate that the pressure washing may effectively remove the paint from the granite with minimal visible surface changes, and support a recommendation of a more comprehensive testing protocol.

In the final analysis, painting the exterior of the EEOB would diminish the integrity of the property as a result of both direct and indirect effects. The natural, unpainted, gray and pink-hued exterior granite walls and details are a character-defining feature, as well as a central component of the building’s style, function, and original design intent. The design, materials, workmanship, setting, and feeling that is conveyed through the building’s primary exterior material would be diminished and fundamentally altered. Despite the use of reputable products, it would result in a highly visible change to a nationally significant building for which future reversibility is uncertain.

As such, Alternative 2 represents an adverse effect to the EEOB.

Other Historic Properties in the APE

Alternative 2 would adversely affect the integrity of setting, materials, feeling, and association for character-defining streetscapes and viewsheds within the **Lafayette Square Historic District**. The viewsheds likely to be most affected would be from the west and north. The EEOB has a monumental presence within the historic district, particularly along the 17th Street and Pennsylvania Avenue streetscapes. Due to its massive size and shallow setbacks, the building’s visibility is almost completely unobscured along these streets. EEOB’s original and historic appearance is central to the character and integrity of the district’s setting, materials, feeling, and association. As constructed, it contributes to the varying styles, periods, materials, and colors that make up the rich architectural character of the district. A fundamental change to the EEOB’s historic appearance would alter the architectural character of the district as well as key historic streetscapes and viewsheds within its boundaries.

Alternative 2 would adversely affect the integrity of setting, feeling, association of the **U.S. Treasury Building**. Painting the EEOB would disrupt the visual hierarchy between the EEOB, White House, and Treasury Building. That hierarchy consists of the EEOB and Treasury Building as two similarly scaled and massed unpainted stone buildings that serve the Executive Branch of the federal government and flank the White House. The White House is by comparison much smaller in size and scale, but its placement at the center of the grounds and white color communicates its importance. As a significant alteration to the EEOB, Alternative 2 would diminish the U.S. Treasury Building’s integrity of setting, feeling, and association by disrupting the visual relationship and hierarchy between the EEOB, White House, and Treasury Building that has been in place for over 125 years.

Research indicates that several additional buildings in the APE have either a historic functional relationship to the EEOB, or the EEOB contributes to their overall setting, feeling, and association. These include the Winder Building, Blair House, and the Metropolitan Club. While

Alternative 2 has the potential to affect these properties, in the final analysis, the effects do not appear to be adverse after applying the Criteria of Effect. Both the Winder Building and Blair House have a historical relationship to the EEOB as government-owned buildings that, together with the EEOB and White House complex, contribute to the character of the area as the city's governmental core. However, the relationship was not a direct or sustained one, and both buildings were constructed prior to the EEOB. While painting the EEOB would alter their historic setting, feeling, and association to a degree, it wouldn't necessarily diminish the overall integrity of those aspects. The Metropolitan Club was intentionally located near the EEOB, White House, and other key governmental buildings to serve their employees and visiting dignitaries. However, the EEOB's change in appearance would not adversely affect the building's integrity of setting, feeling, or association due to distance and lack of direct views to and from the Metropolitan Club's main entrance on H Street, NW.

No additional effects to character-defining features for the remaining buildings and districts in the APE are anticipated (**Table 1**).

5.3 Alternative 3: Exterior Painting of Upper Floors Only

This alternative involves painting the exterior granite walls to the upper floors of all four elevations only, leaving the raised foundation unpainted. As with Alternative 2, the paint would be a shade of white, mineral silicate paint and the courtyard elevations would remain unpainted (**Appendix B**). This alternative aligns with the change in stone color that already exists between the foundation and upper floors.

The façade lighting described in Alternative 1 (Section 5.1) would also occur under this alternative. The product details and surface preparation (including masonry cleaning and repairs) would be the same as described in detail under Section 5.2.

5.3.1 Effects Analysis

As with Alternatives 1 and 2, conservation-based cleaning of the granite and installation of new façade lighting is not expected to result in adverse effects.

Leaving the basement and ground floor unpainted does reduce the magnitude of the adverse effect. In addition, under this alternative, three of the building's seven floors (the basement, ground floor and fifth floor/roof) would remain unchanged. The resulting demarcation between unpainted and painted stone, however, would introduce a degree of contrast that is inconsistent with the building's original design and appearance. The existing difference in hue between the ground and upper floors was designed to be subtle and of a complementary bare stone – adding to the building's grandeur and monumentality. Additionally, when viewed from more distant and open sightlines to the south in particular, the visibility of the ground floor's original stone would be negligible compared to the painted upper floors.

Ultimately, painting the exterior of the EEOB's upper floors still represents a fundamental change, with uncertain reversibility, to the building's historic appearance for the reasons described in Section 5.2.1, above. As such, Alternative 3 represents an adverse effect to the EEOB.

Other Historic Properties in the APE

Although the magnitude of the effect would be reduced, Alternative 3 would adversely affect the integrity of setting, materials, feeling, and association for character-defining streetscapes and viewsheds within the **Lafayette Square Historic District** for the reasons described in Section

5.2.1, above. Similarly Alternative 3 would still adversely affect the integrity of setting, feeling, and association of the **U.S. Treasury Building**. The upper floors of the building are what are primarily visible from various public vantage points throughout the district and from the White House grounds and President's Park in front of the Treasury Building.

No additional effects to character-defining features for the remaining buildings and districts in the APE are anticipated under Alternative 3 (**Table 1**).

5.4 Resolution Strategies

The Section 106 consultation process is ongoing. OA has engaged both NCPC and the D.C. Historic Preservation Office (D.C. HPO). OA met with NCPC in early February and again in early May to present the alternatives and solicit feedback. OA, D.C. HPO, DOI, NCPC, GSA and the ACHP will continue to discuss the alternatives and ways to avoid, minimize, or mitigate the identified adverse effects to historic properties. These parties may develop additional alternatives or mitigation measures to be implemented in order to resolve the Section 106 process. This could include measures to mitigate the adverse effects described above, including direct and indirect effects to the EEOB, Lafayette Square Historic District, and the Treasury Building. Particular attention will be paid to ensure harm is minimized to the maximum extent possible to the NHLs identified in this report, in accordance with Section 110(f). To this end, OA would keep the courtyards of the EEOB unpainted, thereby retaining a portion of the building in the original condition.

In addition, OA has proposed the following mitigation items:

- Completion of Heritage Building Information Modeling (HBIM) or LiDAR scanning to create a digital record of the building and serve as a baseline for monitoring conditions and planning future rehabilitation or restoration efforts.
- Preparation of a detailed maintenance plan for the EEOB's exterior, taking into account the upkeep of any final approved coating or paint.
- Preparation of an updated Historic Structure Report (HSR) or Preservation Plan (PP) for the EEOB, integrating new research, physical changes, and major repairs that have occurred.
- Creation of walking tours, websites/digital story maps, or interpretive panels that focus on the EEOB's original design, style, and sourcing or use of unpainted granite, along with color photographs showing its original appearance.
- Creation of a digital story map focusing on the work and career of Alfred B. Mullett.
- The existing 1969 NRHP nomination form for the EEOB would be updated.
- Public education materials describing the EEOB's original architectural design, stylistic features, and historic use of unpainted granite would be prepared. These materials would be supplemented by color photographs showing the EEOB's original appearance and may consist of walking tours, website content, or interpretive panels within the EEOB.
- Web-based materials highlighting the work and career of Alfred B. Mullett would be developed to enhance public understanding of the building's design and historical significance.

- An oral history project recording interviews with former employees who worked in the EEOB would be conducted.

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Table 1. Summary Assessment of Effects

Resource	No Action	Alternative 1	Alternative 2	Alternative 3	Additional considerations under Section 110(f)
Eisenhower Executive Office Building (EEOB) , NRHP/NHL; Contributing to the Lafayette Square NRHP/NHL Historic District	General soiling and other conditions that warrant cleaning may cause deterioration over time if left on the building surface. Potential adverse effect.	Detailed specifications have not yet been fully developed, but cleaning would follow a conservation-based approach consistent with previous exterior cleaning efforts as well as SOI Standards for Restoration and GSA standards for cleaning granite. New façade lighting would follow best practices for upgrading historic building lighting. No adverse effect.	Surface preparation/cleaning and new façade lighting would follow preservation standards and guidelines to ensure no adverse effects. Painting the exterior walls would adversely affect the property's historic appearance and original design. The change in appearance, combined with risks to the material and uncertain reversibility without harm, would diminish the property's integrity of design, setting, materials, workmanship, and feeling. Adverse effect.	Surface preparation/cleaning and new façade lighting would follow preservation standards and guidelines to ensure no adverse effects. Painting the upper exterior walls reduces the extent of painting and allows the ground floor to remain unchanged in its original and historic appearance and design intent. The painting of the upper floors, however, would still adversely affect the property's original appearance, material, and design intent. The change in appearance, combined with the risks to the materials and uncertain reversibility without harm, would diminish the property's integrity of design, setting, materials, workmanship, and feeling. Adverse effect.	• Alternatives 2 and 3 would have a direct, adverse effect on an NHL. • Paint may not be removable/reversible without potential physical harm to the NHL.
Lafayette Square Historic District , NRHP/NHL	Potential adverse effect.	Conservation-based cleaning and new façade lighting would not diminish the district's integrity of location, design, setting, materials, workmanship, feeling or association. No historic properties affected.	Conservation-based cleaning and new façade lighting would not diminish the district's integrity of location, design, setting, materials, workmanship, feeling or association. Painting the EEOB would alter the district's architectural character and numerous significant viewsheds. It would diminish the district's integrity of design, setting, materials, workmanship, and feeling. Adverse effect.	Conservation-based cleaning and new façade lighting would not diminish the district's integrity of location, design, setting, materials, workmanship, feeling or association. Painting the upper exterior walls reduces the extent of painting and allows the ground floor to remain unchanged in its original and historic appearance. The painting of the upper floors, however, would still diminish the district's integrity of design, setting, materials, workmanship, and feeling. Adverse effect.	• Alternatives 2 and 3 would have an indirect, adverse effect on an NHL historic district.
U.S. Treasury Building , NRHP/NHL	No historic properties affected.	Conservation-based cleaning and new façade lighting would not diminish the property's integrity of location, design, setting, materials, workmanship, feeling or association. No historic properties affected.	Conservation-based cleaning and new façade lighting would not diminish the property's integrity of location, design, setting, materials, workmanship, feeling or association.	Conservation-based cleaning and new façade lighting would not diminish the property's integrity of location, design, setting, materials, workmanship, feeling or association.	• Alternatives 2 and 3 would have an indirect, adverse effect on an NHL.

Resource	No Action	Alternative 1	Alternative 2	Alternative 3	Additional considerations under Section 110(f)
			Painting the EEOB would disrupt the visual hierarchy that exists between the EEOB, White House, and Treasury Building, as well as the balance between the Treasury Building and the EEOB as two gray granite buildings of similar dimensions and ground plans. It would diminish the building's integrity of setting, feeling, and association. Adverse effect.	Painting the upper exterior walls allows the ground floor to remain unchanged and visible from certain public views. The painting of the upper floors, however, would still diminish the building's integrity of setting, feeling, and association. Adverse effect.	
Corcoran Gallery of Art, NRHP/NHL	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	Alternatives 2 and 3 would not result in harm to the NHL.
Civil Service Commission Building, NRHP	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	N/A
Winder Building, NRHP	No historic properties affected.	No historic properties affected.	While painting the EEOB would alter the building's historic setting, feeling, and association to a degree, it wouldn't necessarily diminish the overall integrity of those aspects. No adverse effect.	While painting the EEOB would alter the building's historic setting, feeling, and association to a degree, it wouldn't necessarily diminish the overall integrity of those aspects. No adverse effect.	N/A
Metropolitan Club, NRHP	No historic properties affected.	No historic properties affected.	EEOB's change in appearance would not adversely affect the building's integrity of setting, feeling, or association due to distance and lack of direct views. No adverse effect.	EEOB's change in appearance would not adversely affect the building's integrity of setting, feeling, or association due to distance and lack of direct views. No adverse effect.	N/A
Renwick Gallery (Old Corcoran Gallery), NRHP/NHL	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	Alternatives 2 and 3 would not result in harm to the NHL.
Blair House, NRHP/NHL	No historic properties affected.	No historic properties affected.	While painting the EEOB would alter the building's historic setting, feeling, and association to a degree, it wouldn't necessarily diminish the overall integrity of those aspects. No adverse effect.	While painting the EEOB would alter the building's historic setting, feeling, and association to a degree, it wouldn't necessarily diminish the overall integrity of those aspects. No adverse effect.	Alternatives 2 and 3 would not result in harm to the NHL.
Carnegie Endowment for International Peace, NRHP/NHL	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	Alternatives 2 and 3 would not result in harm to the NHL.
Financial Historic District, NRHP	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	N/A
Pennsylvania Avenue National Historic Site, NRHP/NHS	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	N/A
The National Mall, NRHP	No historic properties affected.	No historic properties affected.	No historic properties affected.	No historic properties affected.	N/A

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Appendix A Current Photographs

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**EEOB Existing Conditions Photographs
(north elevation)**



Photo 1. North elevation from Pennsylvania Avenue, NW, view south.



Photo 2. North elevation, view southwest.



Photo 3. North elevation, view southeast.



Photo 4. North elevation detail, view south.



Photo 5. North elevation detail, view southwest.



Photo 6. North elevation detail, view south.

EEOB Existing Conditions Photographs
(west elevation)



Photo 7. West elevation, view southeast.



Photo 8. West elevation, view east.



Photo 9. West elevation, view northeast.



Photo 10. West elevation detail, view southeast.



Photo 11. West elevation detail, showing subtle distinction between substructure and superstructure granite, view north.

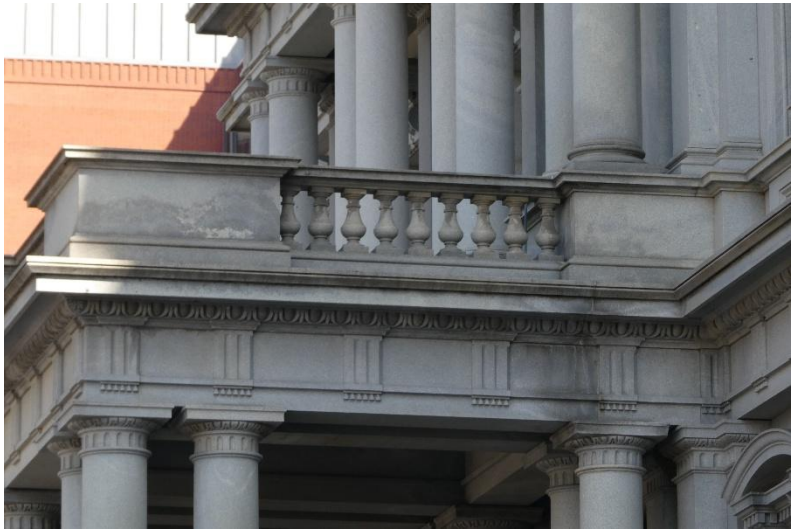


Photo 12. West elevation detail, view north.

EEOB Existing Conditions Photographs
(south elevation)



Photo 13. South elevation, view north.



Photo 14. South elevation, view north.



Photo 15. South elevation, view northwest.



Photo 16. South elevation detail, view west.



Photo 17. South elevation, view north.



Photo 18. South elevation, view northwest.

EEOB Existing Conditions Photographs
(east elevation)



Photo 19. East elevation, view southwest.



Photo 20. East elevation, view south.



Photo 21. Detail view of superstructure granite on east elevation.



Photo 22. East elevation detail, view west.



Photo 23. East elevation detail, view southwest.



Photo 24. Detail view of substructure granite on east elevation.

**EEOB Existing Conditions Photographs
(streetscape/context views)**



Photo 25. View north along 17th Street, NW, from the intersection of 17th and E Streets, NW.



Photo 26. View northeast along New York Avenue, NW.



Photo 27. View east along F Street, NW (the Winder Building is visible on the left).



Photo 29. View south along 17th Street, NW (the Winder Building is visible on the right).



Photo 30. View east along G Street, NW.



Photo 30. View north across President's Park, showing EEOB (*left*) and the White House (*right*), from E Street, NW.

Other Historic Properties in the APE



Photo 31. View east along Pennsylvania Avenue, NW within the Lafayette Square Historic District. Blair House is visible on the right.



Photo 32. View northeast showing the east side of 17th Street, NW within the Lafayette Square Historic District.



Photo 33. View northwest from the U.S. Treasury Building toward Lafayette Square (*left*).



Photo 34. View south across Lafayette Square, with the White House (*left*) and EEOB (*right*) in the background.



Photo 35. View northwest from Pennsylvania Avenue, toward the EEOB (*left*), Sherman Park (*center*), and U.S. Treasury Building (*right*).



Photo 36. U.S. Treasury Building, north elevation, view southwest.

Other Historic Properties in the APE



Photo 37. Corcoran Gallery, view southwest from 17th Street, NW.



Photo 38. View southeast along F Street, showing the Civil Service Commission Building (*far right*) and EEOB (*center-background*).



Photo 39. View east along F Street, showing the Winder Building (*left*) and the EEOB (*center*).



Photo 40. View south along 17th Street, NW (the Winder Building is visible on the right).



Photo 41. View north toward the U.S. Treasury Building, from the western edge of the Pennsylvania Avenue NHS boundary.



Photo 42. View northwest toward the EEOB from the northern edge of the Ellipse within the National Mall Historic District.

Appendix B Renderings

PROPOSED PAINTING CONT'D

IN THIS IMAGE WE
ILLUSTRATE THE EEOB
AS IT WOULD LOOK
UPON COMPLETION
WITH BOTH THE
SUPERSTRUCTURE AND
THE BASEMENTS ALSO
PAINTED WHITE.



Alternative 2

PROPOSED PAINTING CONT'D



Alternative 2

PROPOSED PAINTING CONT'D



Alternative 2

PROPOSED PAINTING WEST WING VIEW



Alternative 2

PROPOSED PAINTING AERIAL VIEW



Alternative 2

PROPOSED PAINTING FINAL



PROPOSED PAINTING

IN THIS IMAGE WE ILLUSTRATE THE EEOB AS IT WOULD LOOK UPON COMPLETION WITH THE SUPERSTRUCTURE PAINTED WHITE, AND MAINTAINING THE EXISTING GRANITE FOR THE BASEMENT AND SUBBASEMENT.



Appendix C Public Buildings and Grounds Resolution

42nd Congress

Committee on Public Buildings
and Grounds

Resolution of the Committee
on Public Buildings and Grounds
relative to the kind of stone to
be used in the building for the
State, War, and Navy Departments.

Resolution of the Committee on Public Buildings and Grounds relative to the kind of stone to be used in the building for the State, War, and Navy Departments, April 26, 1871; Committee on Public Buildings and Grounds; Various Subjects (HR. 42A-F22.9); 42nd Congress; Records of the U.S. House of Representatives, Record Group 233; National Archives, Washington, D.C.

Committee of Public Buildings
and Grounds, U. S. Senate

April 26. 1871

Whereas,
~~Resolved~~ That under section 2 of an act ^{approved Dec. 3. 1871} entitled "An act

making appropriations for the legislation, execution and
judicial expenses of the government for the year ending
June thirty, eighteen hundred and seventy-two," in relation
to the building for the State, War and Navy Departments, it
was provided ^{as follows:} ~~that~~ "the building to be of such kind of
stone as may be hereafter determined by the concurrent
decision of the Committee of Public Buildings and
Grounds of the Senate and House of Representatives"
Therefore,

Resolved, That in pursuance of the foregoing the
said building shall be constructed of granite and that
a copy of this decision be furnished to the Secy of State together
with the original proposals submitted to the Committee by
different bidders for furnishing said material

Justin S. Merrill
Chairman