

EXHIBIT C: ASSESSMENT OF EFFECTS (AOE) REPORT

ASSESSMENT OF EFFECTS REPORT
WHITE HOUSE VISITOR SCREENING FACILITY
WASHINGTON, DISTRICT OF COLUMBIA

AUGUST 2026
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TABLE OF CONTENTS

1.0 Introduction	1
1.1 Description of Project Alternatives	1
1.2 Historic Status of the Project Area	4
2.0 Regulatory Framework.....	6
2.1 Executive Orders	6
3.0 Area of Potential Effects	7
4.0 Historic Properties Within the Area of Potential Effects	8
4.1 Project Area Development History	10
4.1.1 Original Design and Construction.....	10
4.1.2 Changes Since Completion of Sherman Park in 1905	11
4.2 Contributing Landscape Characteristics.....	11
5.0 Identification of Effects.....	14
5.1 Alternative 1: White House VSF at Sherman Park, Below Ground Facility with Above-Ground Entry and Exit Buildings	14
5.1.1 Effects Analysis	15
5.2 Alternative 2: No Action	19
5.2.1 Effects Analysis	19
6.0 Avoidance, Minimization, and Mitigation Measures	24
6.1 Avoidance	24
6.2 Minimization.....	25
6.3 Mitigation	25
6.4 Compliance with Section 110(f).....	25
7.0 References Cited	27

LIST OF TABLES

Table 1. Table of Historic Properties within the APE	8
Table 2. Contributing Landscape Characteristics and Features within the Project Area	12
Table 3. Proposed Alterations to Contributing Landscape Characteristics within the Project Area	17
Table 4. Summary Assessment of Effects, Historic Properties within APE	21

LIST OF FIGURES

Figure 1. Project Location.	5
Figure 2. Area of Potential Effects (APE).....	7
Figure 3. Historic Properties within the APE.	9

1.0 Introduction

The National Park Service (NPS), in coordination with the United States (U.S.) Secret Service (USSS), is undertaking a project to provide a permanent White House Visitor Screening Facility (VSF) to support security screening needs for the entire campus to serve White House staff, south Ellipse parking staff, visitor tours, and large-scale events (the Project). The Project would be located in Sherman Park, a component landscape of President's Park South, on the south side of the U.S. Department of the Treasury. In this report, Sherman Park refers to the area bounded by 15th Street NW on the west, E Street NW on the south, East Executive Avenue NW on the east, and Alexander Hamilton Place NW on the north (see **Figure 1**). The term Sherman Plaza refers to the paved area immediately around the William Tecumseh Sherman Memorial in the center of Sherman Park. Portions of the Project Area are contributing features of the Plan of the City of Washington (L'Enfant-McMillan Plan), the President's Park South Historic District, and the National Mall Historic District all listed in the National Register of Historic Places (NRHP or National Register). The Project Area also includes part of the Lafayette Square Historic District, a designated National Historic Landmark (NHL). The General William Tecumseh Sherman Monument is the centerpiece of Sherman Plaza and is included in the National Register listed Civil War Monuments Thematic Group. The Project is a Federal undertaking and thus the NPS is taking into account the effects of the Project on historic properties in compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR Part 800. As the Project would occur within a designated NHL, the NPS is also complying with Section 110(f) of the NHPA (54 U.S.C. § 306107).

This report provides an assessment of effects for two alternatives under consideration for providing screening for White House visitors. The alternatives under consideration are titled Alternative 1 (Preferred Alternative) and Alternative 2 (No Action Alternative). Potential effects on archeological resources are assessed in a separate Phase IA Archeological Assessment prepared in conjunction with this Assessment of Effects report.

1.1 Description of Project Alternatives

Since its commissioning by President Theodore Roosevelt, the East Wing of the White House has served as the primary entrance for visitors, guests, tours, and social events. The USSS has conducted security screening for these functions along East Executive Avenue for decades to best manage site access and security for the White House. Since the demolition of the original Visitor Entrance Building in 2006 and presentation of the first conceptual design options for its replacement ca. 2012, the area in and around Sherman Park on lower East Executive Avenue has been evaluated and identified as the best site for a purpose-built VSF due to its proximity to the East Wing and established security perimeters and protocols in this area. Situating the Project alternatives within Sherman Park would support organized visitor movement, while simultaneously allowing White House daily operations to continue uninterrupted.

Alternative 1 includes a primarily below grade screening facility with two separate above-ground buildings for entry and exit. The above-ground entrance pavilion would be located on the west side of Sherman Park along East Executive Avenue, south of Alexander Hamilton Place NW. Visitors would enter Sherman Park via one of two existing diagonal walkways leading into the park from 15th Street NW. Once within the park, a new walkway centered on the west side of Sherman Plaza would lead visitors to the entrance pavilion and continue into the below-grade facility for screening. Once cleared through security, visitors would return to grade level via escalators, which would lead to the exit building referred to as the North Screening Post, located along East Executive Avenue north of Alexander Hamilton Place NW. Cleared visitors would then be able to exit into the north side of the secure complex. The North Screening Post would also provide screening for badged staff and contractors. Additional above-ground elements of the Project include ventilation for the below-ground facility, installed on the roof of the entrance plaza, and a stairwell at the southwest corner of Sherman Park, adjacent to the south gate of East Executive Avenue. This stairwell would function as a badged access point for facility personnel, and as an emergency egress from the below-grade facility (see **Appendix B**). This alternative meets the overarching goal of the Project, which is to address current screening deficiencies, expand screening capacity, and eliminate the need for temporary screening infrastructure for events. As a result, the permanent facility would strengthen campus security and enhance the overall visitor experience.

Alternative 2 would not include a permanent, purpose-built White House VSF. No construction would occur, and White House visitors would continue to be screened through temporary tents and trailers in and around Sherman Park. Visitors would continue to queue within the paved pathways of Sherman Park before proceeding through an initial security checkpoint under temporary tents before proceeding to a double-wide trailer on East Executive Avenue. These screening procedures have limited capacity and limited adaptability for evolving screening technologies and capabilities. Additionally, Sherman Park would continue to be frequently inaccessible to the public due to closures when visitors are queuing for special events or security protocols are implemented.

Between 2012 and 2026, multiple alternatives were considered for the White House VSF, evaluated during the design development process, and ultimately eliminated from further consideration, as summarized below.

LILY TRIANGLE / BELOW EAST EXECUTIVE AVENUE AND E STREET

This alternative would require additional below-grade square footage to reach an acceptable exit location within the secure perimeter of the White House, increasing complexity and cost. This location would also be closer to the White House viewshed, raising visual concerns. In addition, the site lacks direct access from a public sidewalk, and safe visitor access would require crossing E Street or constructing an additional tunnel connection. Due to substantial constructability and operational challenges, this alternative was eliminated from further consideration.

Further, this alternative had the potential to result in additional archeological impacts due to broader ground disturbance and increased potential visual impacts to the White House, Ellipse, and Department of Commerce Building.

NORTH OR SOUTH TREASURY – BELOW-GROUND PLAZA / PARTIAL COURTYARD INFILL

This alternative would require major upgrades to existing utilities and structural constraints around the Treasury. Implementation would also affect views of the U.S. Department of the Treasury, substantially altering the Treasury's historic entrance plaza, including modifications to the entrance steps and loss of the grass courtyard space, and removal of the historic fence and south plaza.

Further, this alternative had the potential to result in additional physical and visual impacts on the U.S. Department of the Treasury, as well as more limited opportunities to avoid or minimize harm to the designated NHL.

SHERMAN PARK – BELOW-GROUND FACILITY (NORTH ENTRY PLAZA)

The north quadrant's higher elevation would require extensive excavation and ramping to achieve necessary depths, resulting in substantial alteration of Sherman Park. The proposed circulation path would require visitors to descend and then re-ascend to reach the exit connection, complicating flow and operational efficiency. Due to topographic constraints, operational inefficiencies, and potential impacts to the U.S. Department of the Treasury, this alternative was eliminated from further consideration.

In addition, this alternative had the potential to result in additional archeological impacts due to more extensive ground disturbance, increased additional physical and visual impacts on the U.S. Department of the Treasury, as well as more limited opportunities to avoid or minimize harm to the designated NHL.

SHERMAN PARK – BELOW-GROUND FACILITY (EAST ENTRY PLAZA)

This alternative would be constrained by a large sewer tunnel traversing the southeast quadrant of Sherman Park. Development at this location would affect three quarters of the park and require additional below-grade space to connect to the primary screening area, increasing complexity and overall impact. Due to infeasible site conditions and extensive park impacts, this alternative was eliminated from further consideration.

This alternative also had the potential to result in substantial archeological impacts as well as more intense physical impacts to Sherman Park.

SHERMAN PARK – ABOVE-GROUND FACILITY

An entirely above-ground facility would be highly visible within a prominent public and cultural landscape, potentially interfering with the southern viewshed of the U.S. Department of the Treasury and views of the Sherman Monument. Space for tree replacement would be limited and any remaining open space within the park would need to be utilized for queueing and visitor lines. In addition, siting the facility entirely above ground could require discharging screened visitors into a non-secure area, necessitating additional security to manage visitor movement and thereby reducing operational efficiency. Due to visual, operational, and security concerns, as well as space limitations, this alternative was eliminated from further consideration.

This alternative had the greatest potential of the alternatives considered to result in adverse effects to historic properties and very limited opportunities to avoid or minimize harm to the NHL-designated U.S. Department of the Treasury or Lafayette Square Historic District.

SHERMAN PARK – RECESSED ENTRANCE PLAZA

This alternative would entail constructing the White House VSF primarily below-grade within Sherman Park, with a recessed entrance plaza located in the southern portion of Sherman Park. A stairwell would be constructed at the southwest corner of the park for access by the USSS and facility personnel, as well as an emergency egress from the below-grade building. During the preliminary design process for this alternative, it was determined that a large underground sewer tunnel traversing the southwest quadrant presented additional design challenges.

Further, this alternative was presented to Section 106 Consulting Parties in Spring 2026, who identified concerns regarding the design of the recessed entrance plaza and potential impacts on the surrounding cultural landscape as well as the NHL-designated U.S. Department of the Treasury.

ALTERNATE LOCATIONS – NORTH SCREENING POST/EXIT

Shifting the North Screening Post further north along East Executive Avenue or to the north or south of the U.S. Department of the Treasury would conflict with existing underground utilities and infrastructure for which there is no feasible alternative to relocate. Additionally, shifting the North Screening Post further north encroaches on the Secretary of Treasury's Bridge, which must not be hindered for operational concerns. Likewise, moving it to the south would greatly effect vehicle traffic patterns for Alexander Hamilton Place, Lower East Executive Avenue, and access to the White House's southern roadway. The west side of East Executive Avenue was also determined to be unsuitable as this area is planned for operational support to the East Wing and Executive Residence. Due to significant utility conflicts, visual concerns, and logistical constraints, this alternative was eliminated from further consideration.

This alternative had the potential to result in additional physical and visual impacts on the U.S. Department of the Treasury and additional visual impacts on the Lafayette Square Historic District, as well as more limited opportunities to avoid or minimize harm to both designated NHLs.

DEPARTMENT OF COMMERCE BUILDING – ENTRANCE COMPLEX

This alternative involved constructing a below-grade facility at the Department of Commerce Building on the east side of 15th Street, NW. This was originally considered in 2012 under the NPS's White House and President's Park Comprehensive Design Plan. Because of the location, much of the facility (100,000 square feet or more) would have had to be constructed underground in order to safely get visitors from 15th Street, NW to Lily Triangle and East Executive Avenue, and on to the White House visitor entrance. Due to significant below-grade development requirements and costs, this alternative was eliminated from further consideration.

While this alternative had the potential to minimize adverse effects on the U.S. Department of the Treasury, it also had the potential to result in additional archeological impacts due to more extensive ground disturbance, as well as adverse effects on the Ellipse and the NRHP-listed Department of Commerce Building.

1.2 Historic Status of the Project Area

The Project Area is located within President's Park, southeast of the White House. The Project Area was included within "President's Park" and Reservation 1 on Pierre Charles L'Enfant's 1791 plan for the City of Washington. The area was initially part of the White House grounds but later became associated with the U.S. Department of the Treasury built east of the White House and the Sherman monument south of the U.S. Department of the Treasury. A more detailed historical overview of the development of the Project Area is provided in **Section 3**.

The Project Area was documented in the *President's Park South Cultural Landscape Inventory* (CLI) (National Park Service [NPS] 2016). It is located within the Sherman Park, grounds of the U.S. Department of the Treasury, and East Executive Park character areas described in this CLI (see **Section 4.1.3**).

The Project Area is a contributing feature of several historic properties: the Plan of the City of Washington (L'Enfant-McMillan Plan), the President's Park South Historic District, the National Mall Historic District, and the Pennsylvania Avenue National Historic Site. The General William Tecumseh Sherman Monument is also included as a contributing resource to several of these properties.

The Plan of the City of Washington (L'Enfant-McMillan Plan) was listed in the NRHP on April 24, 1997 (Reference #97000332). This resource includes virtually all extant components of the historic city plan, including street rights-of-way and public reservations. The entirety of the Project Area is within the boundaries of the L'Enfant Plan of the City of Washington Plan of the City of Washington (L'Enfant-McMillan Plan).

The President's Park South Historic District was listed in the NRHP on May 6, 1980 (Reference #80000347). The boundary for this historic district includes that part of the Project Area south of Alexander Hamilton Place, west of 15th Street NW, and east of South Executive Avenue. The General William Tecumseh Sherman Memorial is a contributing resource to this district. Several adjacent NHLs, including the Lafayette Square Historic District and the U.S. Department of the Treasury, are located immediately north of this district.

The National Mall Historic District was listed in the NRHP on October 15, 1966 (Reference #66000031) and with an expanded boundary on November 29, 2016 (Reference #16000805). This historic district includes part of the Project Area south of Alexander Hamilton Place, west of 15th Street NW, and east of East Executive Avenue. The General William Tecumseh Sherman Memorial is a contributing resource to this district.

The Pennsylvania Avenue National Historic Site was listed in the NRHP on October 15, 1966, and amended on October 12, 2007 (Reference #66000865). The site encompasses the national ceremonial route of Pennsylvania Avenue between the Capitol and the White House. Sherman Park is a contributing site, and the General William Tecumseh Sherman Memorial is a contributing resource to this National Historic Site.

The Civil War Monuments Thematic Group was listed in the NRHP on September 20, 1978 (Reference #78000257). The General William Tecumseh Sherman memorial is identified as an individual property, with the nomination focused on the monument itself and not the surrounding parkland.



2.0 Regulatory Framework

Enacted in 1966, the goal of Section 106 of the NHPA is to ensure that federal agencies consider the impacts of federal undertakings on historic properties. While Section 106 of NHPA does not require a specific preservation outcome, the NHPA acknowledges the importance of preserving our nation's diverse heritage and directs federal agencies to act as responsible stewards of historic properties (Advisory Council on Historic Preservation [ACHP]).

Section 106 (discussed in **Section 2.1**) requires federal agencies to take into account the effects of their actions on historic properties prior to the issuance of any license, permit, approval, or expenditure of federal funds. It also requires that the Advisory Council on Historic Preservation (ACHP) must have a reasonable opportunity to comment on any federal agency undertaking.

Section 106 of the NHPA (54 U.S.C. § 306108) requires federal agencies to take into account the effects of their actions on historic properties. The NHPA also created the ACHP and authorized it to issue regulations governing the implementation of Section 106. These regulations are set forth in 36 CFR Part 800.2. 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. As set forth in the ACHP's current regulations implementing Section 106, Section 106 consultation includes four main steps: initiating consultation; identifying historic properties within the area of potential effects of the undertaking; assessing the undertaking's effects on historic properties; and resolving any adverse effects on those properties.

The ACHP's implementing regulations include special requirements applicable to Section 106 consultations for undertakings that may directly and adversely affect an NHL (36 CFR § 800.10) and require that the ACHP and the Secretary of the Interior be invited to participate in such Section 106 consultations.

Section 110(f) of the NHPA (54 U.S.C. § 306107) requires that "prior to the approval of any undertaking that may directly and adversely affect any" NHL, agencies must "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to the landmark." Portions of the Project Area are within an NHL historic district, and Section 110(f) applies to this assessment of effects for the Project.

2.1 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).

3.0 Area of Potential Effects

The current regulations implementing Section 106 require 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 17th Street NW and West Executive Avenue NW to the west, State Place NW and Pennsylvania Avenue NW to the north, 14th and 15th Streets NW on the east, and E Street NW and Constitution Avenue NW to the south. The APE boundaries reflect the outer limits from which views toward the Project Area may reasonably generate adverse effects and includes views and viewsheds from the surrounding area (see **Figure 2**).

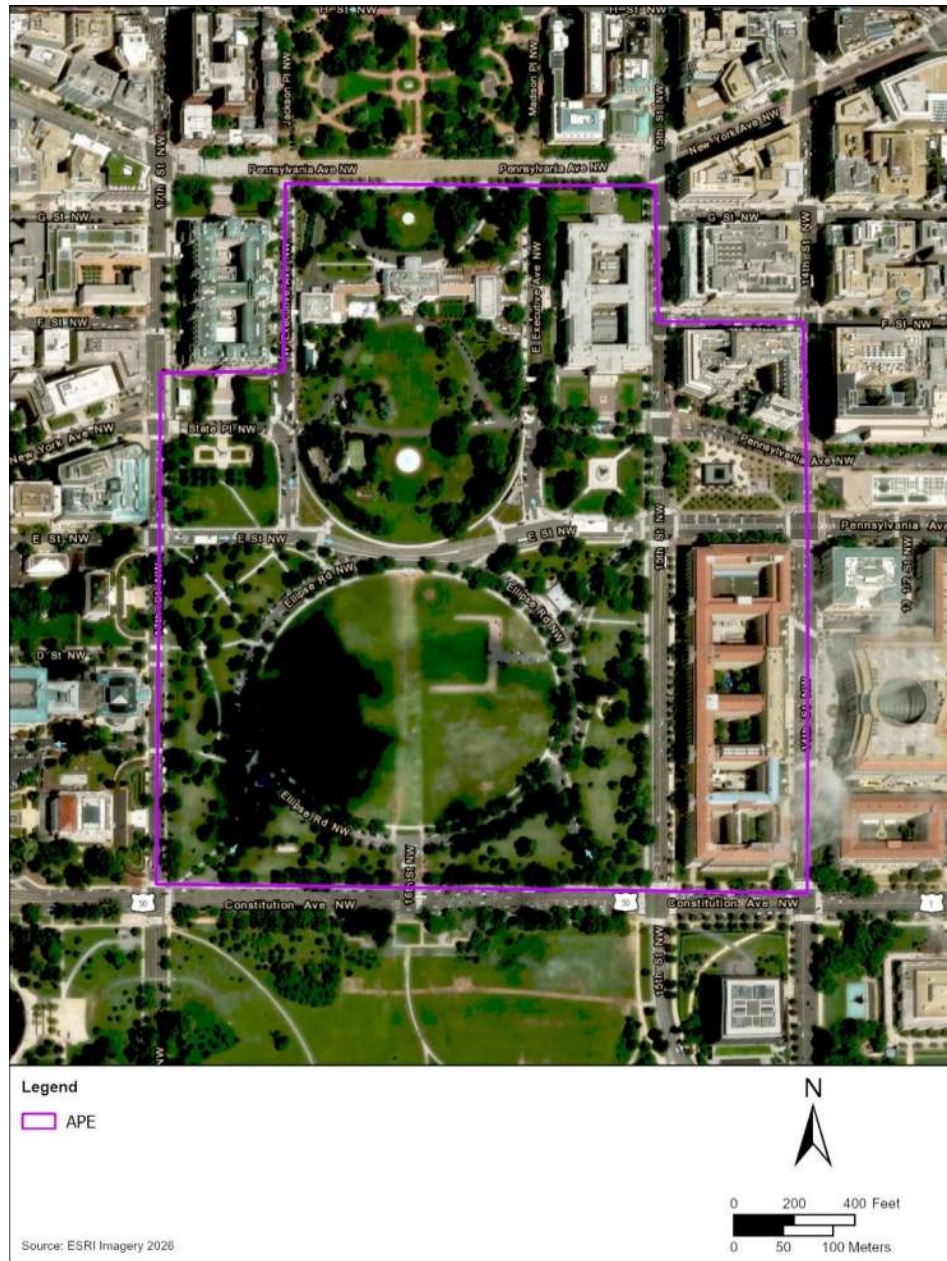


Figure 2. Area of Potential Effects (APE)

4.0 Historic Properties Within the Area of Potential Effects

Historic properties within the APE were identified utilizing online databases including the NRHP, the list of NHL's maintained by the NPS NHL program, DC Office of Planning's PropertyQuest and HistoryQuest, Open Data DC, and the DC 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 Project from surrounding streets was conducted by a team of qualified Architectural Historians on March 13, 2026.

The APE includes a total of 12 historic properties, including five (5) individual properties and seven (7) area resources or historic districts. Two (2) of the total 12 historic properties are also designated NHLs: the U.S. Department of the Treasury and the Lafayette Square Historic District. See **Table 1** and **Figure 3** for a list and map of these resources, respectively.

Table 1. Table of Historic Properties within the APE

Resource Name	Location/Address	Additional Information
General William Tecumseh Sherman Memorial, NRHP	Sherman Park	Contributes to the National Mall Historic District, President's Park South Historic District, Pennsylvania Avenue National Historic Site, and the Civil War Monuments Thematic Group
U.S. Department of the Treasury, NRHP, NHL	1500 Pennsylvania Avenue	Contributes to the Lafayette Square Historic District (NHL), Pennsylvania Avenue National Historic Site, and the Fifteenth Street Financial Historic District
Bulfinch Gatehouses, NRHP	Constitution Avenue at 15 th Street NW and 17 th Street NW	Contributes to the Plan of the City of Washington Historic District and National Mall Historic District
Hotel Washington, NRHP	515 15 th Street NW	Contributes to the Fifteenth Street Financial Historic District and Pennsylvania Avenue National Historic Site
Willard Hotel, NRHP	1401 Pennsylvania Avenue	Contributes to the Pennsylvania Avenue National Historic Site
President's Park South Historic District, NRHP	Constitution Avenue, 17 th Street NW, State Place NW, E Street NW, Alexander Hamilton Place NW, and 15 th Street NW	N/A
Lafayette Square Historic District, NRHP, NHL	Immediate vicinity of Lafayette Square	N/A
National Mall Historic District, NRHP	Capitol grounds, Independence Avenue, Constitution Avenue, Potomac River	N/A
Pennsylvania Avenue National Historic Site, NRHP	3 rd Street NW, Constitution Avenue, East Executive Avenue, E and F Streets NW	N/A
Plan of the City of Washington (L'Enfant-McMillan Plan), NRHP	Rights-of-way for streets and avenues, and public reservations in Washington, D.C.	N/A
Federal Triangle Historic District, NRHP	15 th Street NW, Pennsylvania Avenue NW, and Constitution Avenue	N/A
Fifteenth Street Financial Historic District, NRHP	15 th Street NW between Pennsylvania Avenue and I Street NW	N/A

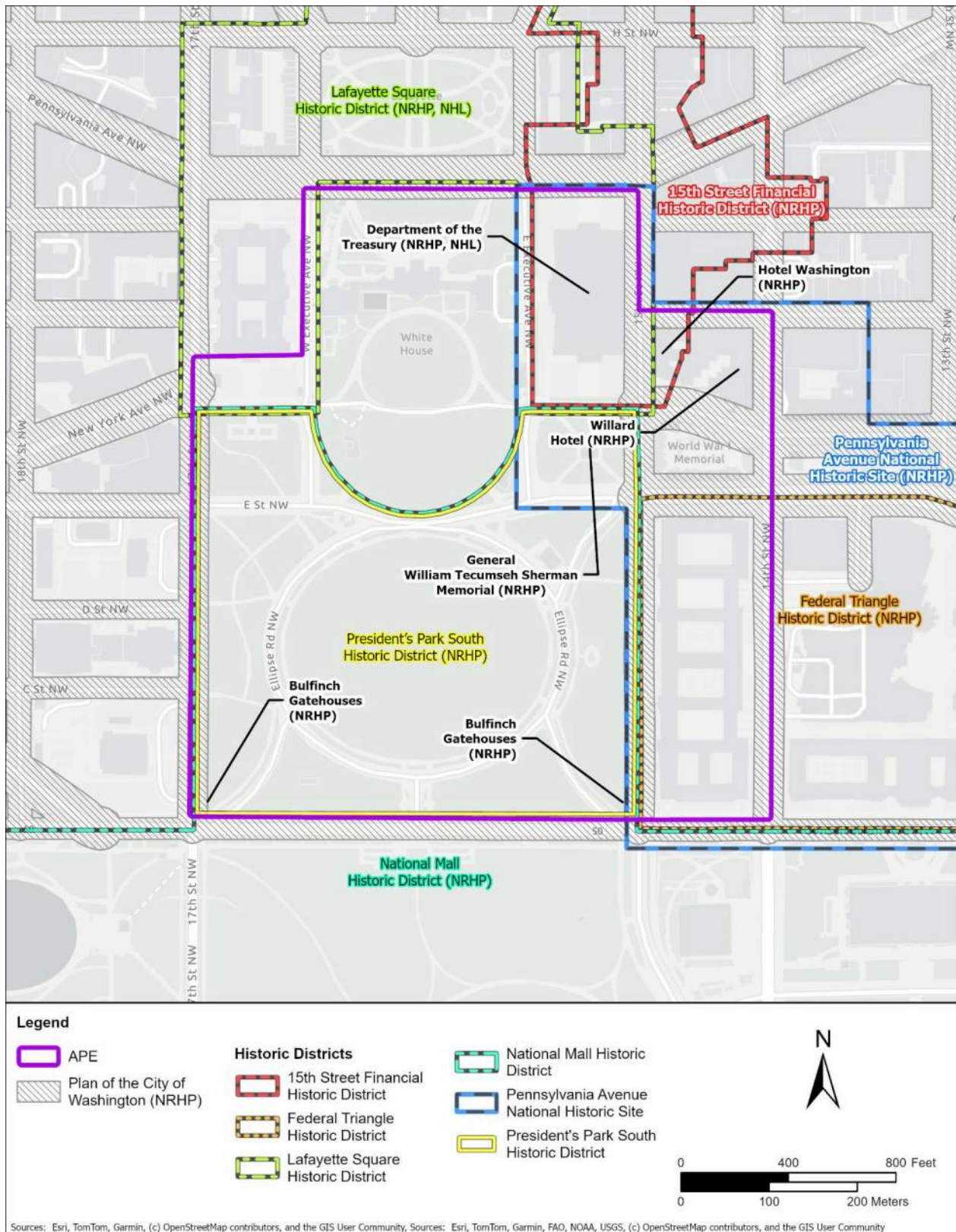


Figure 3. Historic Properties within the APE.

4.1 Project Area Development History

4.1.1 Original Design and Construction

When Pierre Charles L'Enfant laid out his original plan for Washington, D.C. in 1792, he designated approximately 82 acres for the executive residence and accompanying park, part of which would later be occupied by East Executive Avenue, the U.S. Department of the Treasury, and Sherman Park.

Construction on the White House began in 1792, and at George Washington's behest, sites flanking the executive residence were chosen for the executive office buildings that would house the State, War, Navy, and U.S. Department of the Treasury, facilitating the daily workings of the government and symbolizing the departments' support for the president (NPS, 2016; United States Executive Office of the President, 1984). The War Department building was constructed to the west, and the U.S. Department of the Treasury was completed to the east of the executive residence in 1800. Following a fire in 1801 that caused damage to the U.S. Department of the Treasury, a fireproof extension was built on the west side of the Treasury in 1806 to protect important documents. Around the same time, a stable and cowshed were built on the present-day Treasury grounds, east of the executive residence (NPS, 2016). As directed by Thomas Jefferson, an eight-foot stone wall was also built at this time, surrounding the White House on all sides and providing privacy to the residents.

During the war of 1812, the executive office buildings, along with the White House, were burned during the British invasion of Washington, D.C. The buildings were reconstructed in 1816, and two additional executive office buildings were built north of the existing ones, with the War and Navy Departments occupying the west side of the executive residence and the State and U.S. Department of the Treasury to the east (NPS, 2016). After the U.S. Department of the Treasury was destroyed in another fire in 1833, architect Tobert Mills proposed a new, larger, E-shaped U.S. Department of the Treasury of fireproof construction. The design was accepted, and the site of the existing Treasury and State buildings was selected for the new building. Despite Mills' preference for granite, due to financial restrictions from Congress, Acquia Creek Sandstone was selected for the building, and construction began in 1836 (Morton III, 1971). Construction halted in 1842, after only the central and east wings had been constructed.

In 1849, on the site that would become Sherman Park, a temporary artist's studio and furnace were constructed for the use of Clark Mills, a sculptor commissioned to build a statue of Andrew Jackson in Lafayette Square Park. The statue was dedicated in 1853, and studio was presumably removed. In 1855, Thomas U. Walter proposed an extension of the U.S. Department of the Treasury, and construction began on the south wing, this time using granite. A portion of the eight-foot stone wall surrounding the White House was likely removed at this time as well. Following completion of the south wing in the early 1860s, work began on the west wing but was interrupted by the Civil War. Construction resumed following the State Department building, which had remained standing during earlier phases of construction, was demolished ca. 1866-7. The U.S. Department of the Treasury was completed with the construction of the north wing in 1869, though it was modified again shortly afterwards with the creation of a raised central terrace off of the south elevation (Morton III, 1971).

Simultaneously with the north wing's construction, development continued in the areas adjacent to the new Treasury. From 1863 to 1865, a Treasury photography lab, which included a drying yard to dry developed photographs and a fenced semicircular entrance, was built south of the Treasury on the site of Sherman Park. A greenhouse may also have been located near the photography lab (NPS, 2016). In 1866, construction began on East Executive Avenue, a north-south corridor between the new Treasury and the executive residence. East Executive Avenue extended south of the White House grounds and, in 1871, connected to the new West Executive Avenue. The street was lined with sidewalks, gutters, sewers, and lampposts, as well as fencing that would remain in place until the 1930s. It was shortly after this, during Grant's presidency from 1869 to 1877, that the remainder of the wall surrounding the White House was demolished (Janke, 2010). When the U.S. Department of the Treasury was completed in 1869, fencing was built around its perimeter, forming a barrier between the newly completed building and the new East Executive Avenue, and a fountain was installed along East Executive Avenue. In ca. 1880, security was increased when officer booths were constructed along the new East Executive Avenue and traffic access became restricted. A watchman's house was also built ca. 1894 on the site of Sherman Park (NPS, 2016).

In 1891, upon the death of General William Tecumseh Sherman, revered Union general of the Civil War, a campaign began for a memorial in his honor, and Congress appropriated \$50,000 for the memorial the following year. Danish-American sculptor Carl Rohl-Smith won the commission with his design for the memorial in an open competition in 1896. In preparation for the new park and sculpture, the Treasury photography studio and greenhouse were removed from the Sherman Park site in 1898. A studio for Rohl-Smith's use was built to the west in 1900, but the artist died later that year. Because his design was nearly complete, his wife, Sara Rohl-Smith, completed the casting for the equestrian sculpture, and the General William Tecumseh Sherman Monument was dedicated in 1903. After the dedication, the new Sherman Park was landscaped according to plans by the Superintendent of the Office of Buildings and grounds, Colonel Thomas W. Symons. The design included a circular walk surrounding the statue and curving walks around flower beds, as well as lawns, new lamp posts, and later, trees and shrubs (NPS 2007).

4.1.2 Changes Since Completion of Sherman Park in 1905

In 1923, a temporary demonstration house was built for the Better Homes Demonstration Week in Sherman Park, west of the Sherman Monument. Following the exhibition, the house was donated to the Girl Scouts as a training and innovation center and was moved to a new location on New York Avenue NW the following year (Robertson, 2024).

In 1934, the landscape of Sherman Park was altered per National Park Service plans, incorporating recommendations from Frederick Law Olmsted, Jr., and Gilmore D. Clark. These alterations included wider walkways, regrading, changing the shape of the plaza from a circle to a rectangle, and planting new hedges and trees (NPS, 2016).

East Executive Avenue, which operated as an urban street as well as a route taken by White House visitors, underwent minor changes through the mid-20th century, including new plantings in the 1960s, replacement of granite paving with terrazzo in 1976, and the installation of new lamp posts in 1984. In 1985, a plan for East Executive Avenue was implemented to convert the avenue to a park space. The project involved widening the sidewalks, paving a service lane for delivery drivers, and adding additional lawn space. A new White House visitor entrance was built, and officer booths were installed. The avenue was renamed East Executive Park and established as a public park during daylight hours. As such, oak trees were planted, and benches, planters, and lighting were installed. The redesign also removed sidewalks leading to the U.S. Department of the Treasury and replaced them with turf (NPS, 2016).

In 1991, a rehabilitation project of Sherman Park involved the replacement of deteriorated sidewalks with precast concrete pavers with granite trim and exposed aggregate concrete. The space was spruced up with new lamp posts, benches, and plantings. New bollards, as well as playground and picnic areas to the southwest, were also installed in the 1990s (NPS, 2016).

Following the terrorist attacks of September 11, 2001, security was increased around East Executive Park, the U.S. Department of the Treasury, and Sherman Park. New officer booths were placed on the south grounds of the Treasury, and the gates to East Executive Park were permanently closed to the public. New planters were also placed to restrict vehicular access, and granite-clad retaining walls were built along the south and east perimeters of Sherman Park. In 2002, East Executive Park was updated with the installation of granite bands and coping, sidewalks replacement with precast concrete pavers, and installation of turf, as well as new systems for irrigation and drainage. The no-longer-functioning fountain, installed ca. 1869, was also removed (NPS, 2016).

Since 2021, the Sherman Park area has increased security. It is surrounded with barrier systems, and access is restricted. A visitor screening building, now removed, had been added near the entrance of East Executive Park (NPS, 2016).

4.2 Contributing Landscape Characteristics

The Project Area was extensively documented in the Cultural Landscapes Inventory for President's Park South (CLI) (NPS 2016). The CLI lists contributing and non-contributing landscape features within each character area. The contributing features within the Project Area are listed in **Table 2**.

Sherman Park is the open green space south of the U.S. Department of the Treasury and adjacent to the southeast corner of the White House grounds. It is bounded by Alexander Hamilton Place NW, 15th Street

NW to the east, E Street NW to the south, and East Executive Avenue to the east. The character area has a formal, geometric layout with a focal point of the equestrian statue to General William Tecumseh Sherman, standing on a granite base on a paved plaza (Sherman Plaza) at the top of a small knoll surrounded by turf and deciduous trees. Paved walkways connect the plaza to the enclosing roads.

The East Executive Park character area is a linear landscape centered on the historic circulation corridor of East Executive Avenue. It is bound by the access gates at Pennsylvania Avenue NW to the north, the perimeter fence and wall system of the U.S. Department of the Treasury to the east, access gates at Alexander Hamilton Place NW to the south, and the perimeter fence and wall of the White House grounds to the east. The dominant features of this character area are the north-south roadway, edged by parking, sidewalks, street tree plantings, benches, and lampposts.

The grounds of the U.S. Department of the Treasury character area is an approximately 5-acre parcel bounded by Pennsylvania Avenue to the north, 15th Street NW to the east, Alexander Hamilton Place NW to the south, and East Executive Park to the east. The focal point of this character area is the large Greek Revival building of the U.S. Department of the Treasury. The building closely edges the sidewalk along 15th Street NW with a large flight of entrance stairs centered on the east elevation. Smaller entrance stairs are centered on the north and south elevations. Adjacent to the north and south elevations are paved terraces that feature large bronze statues of former Treasury Secretaries, Albert Gallatin on the north and Alexander Hamilton on the south. To the west of the U.S. Department of the Treasury are planted terraces that separate this character area from East Executive Park. An areaway along the east side of the building and accessed from Alexander Hamilton Place NW provides access to the lower level of the U.S. Department of the Treasury.

Table 2. Contributing Landscape Characteristics and Features within the Project Area

Landscape Character Area	Landscape Characteristic	Landscape Feature
Sherman Park	Spatial Organization	Rectilinear property boundary
Sherman Park	Spatial Organization	Formal geometric layout of the plaza with equestrian statue as a focal point
Sherman Park	Spatial Organization	Orthogonal plantings of trees in the four quadrants formed by the diagonal walks from Sherman Plaza
Sherman Park	Natural Systems and Features	Descending topography from north to south and east to west
Sherman Park	Natural Systems and Features	Level terrace associated with the monument plaza
Sherman Park	Land Use	Commemoration
Sherman Park	Land Use	Recreation
Sherman Park	Cultural Traditions	Public gathering
Sherman Park	Circulation	Alexander Hamilton Place NW
Sherman Park	Circulation	East Executive Park
Sherman Park	Circulation	Sidewalks along Alexander Hamilton Place NW and East Executive Park
Sherman Park	Circulation	Diagonal walks
Sherman Park	Circulation	Sherman Plaza
Sherman Park	Vegetation	Willow oak plantings
Sherman Park	Vegetation	American elm plantings
Sherman Park	Vegetation	Flower beds
Sherman Park	Vegetation	Turf
Sherman Park	Buildings and Structures	General William Tecumseh Sherman Statue
Sherman Park	Buildings and Structures	Freestanding walls at the junction of the diagonal walls and Sherman Plaza

Historic Properties Within the Area of Potential Effects

Landscape Character Area	Landscape Characteristic	Landscape Feature
Sherman Park	Views and Vistas	Views to the Sherman Statue from the surrounding landscape
Sherman Park	Views and Vistas	Reciprocal views between the Sherman Plaza, Hamilton Statue, and south entrance to the U.S. Department of the Treasury
Sherman Park	Views and Vistas	Views of the Washington Monument
Sherman Park	Small-scale Features	Lampposts (Millet-style)
East Executive Park	Spatial Organization	Linear corridor defined by fences and rows of trees, containing vehicular and pedestrian circulation
East Executive Park	Natural Features and Systems	Topography gently descending from north to south
East Executive Park	Land Use	Administrative Office
East Executive Park	Land Use	Ceremonial
East Executive Park	Land Use	Recreation
East Executive Park	Land Use	Security
East Executive Park	Circulation	East Executive Avenue
East Executive Park	Circulation	Pedestrian walk system
East Executive Park	Buildings and Structures	East Executive Park gates (south pair)
East Executive Park	Views and Vistas	Linear framed view extending north-south along East Executive Avenue
Grounds of the U.S. Department of the Treasury	Spatial Organization	Rectilinear parcel with a central rectangular building framed by city streets
Grounds of the U.S. Department of the Treasury	Spatial Organization	Perimeter boundary in the form of a wall, piers, fences, and gates
Grounds of the U.S. Department of the Treasury	Natural Systems and Features	Overall slope descending from north to south
Grounds of the U.S. Department of the Treasury	Land Use	Recreation
Grounds of the U.S. Department of the Treasury	Land Use	Security
Grounds of the U.S. Department of the Treasury	Circulation	Areaway
Grounds of the U.S. Department of the Treasury	Buildings and Structures	Perimeter fence and retaining walls
Grounds of the U.S. Department of the Treasury	Views and Vistas	View from the elevated position of the monumental stairs toward Sherman Park, the Sherman Statue, and Washington Monument

5.0 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*¹ 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)).

To assess Project effects, an Architectural Historian meeting the *Secretary of the Interior's Professional Qualifications Standards*² 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, the proposed alternatives were analyzed and the criteria of adverse effects were applied. A finding of “**no adverse effect**” or “**adverse effect**” is recommended for each historic property:

- **No Adverse Effect:** A finding of “no adverse effect” means that effect(s) from the Project do not meet the Criteria of Adverse Effect in 36 CFR § 800.5(a)(1).
- **Adverse Effect:** A finding of “adverse effect” means that effect(s) of the project meet the Criteria of Adverse Effect in 36 CFR § 800.5(a)(1).

The following analysis is an assessment of effects of each alternative on NRHP-eligible or listed historic properties within the APE and is based upon the criteria of adverse effect. Within each alternative, effects on contributing features of the Project Area are addressed first, followed by effects to other historic properties in the APE. These effects are also summarized in **Tables 3 and 4**. Compliance with Section 110(f) is addressed in **Table 4**.

5.1 Alternative 1: White House VSF at Sherman Park, Below Ground Facility with Above-Ground Entry and Exit Buildings

The White House VSF would provide a permanent visitor screening facility for White House visitors. The White House VSF would be largely underneath the western portion of Sherman Park. Visitors would enter the White House VSF through an approximately 8,000 square foot entrance pavilion located within the westernmost portion of the park. Once inside, visitors would then proceed to an approximately 34,700 square feet below-grade facility. Once visitors have been cleared for entry, they would reach a set of escalators at the north end of the below-grade facility and return to grade level within the North Screening Post.

The entrance pavilion would be a rectangular, one-story building centrally located along East Executive Avenue within the westernmost side of Sherman Park. To access the building, visitors would enter Sherman Park using one of the two existing diagonal walkways leading into the park from 15th Street NW. Once inside the park, a new east-west walkway would lead visitors from the west side of Sherman Plaza to the entrance pavilion. The building would utilize classical design elements such as a flat roof with cornice, exterior stone and granite cladding, engaged pilasters, and a colonnaded entry pavilion. An above-ground

¹ See <https://nps.gov/orgs/1739/secretary-standards-treatment-historic-properties.htm>

² See <https://www.nps.gov/articles/sec-standards-prof-quals.htm>

stairwell is at the southwest corner of Sherman Park, adjacent to the south gate of East Executive Avenue. This stairwell would function as a badged access point for facility personnel, and as an emergency egress from the below-grade facility.

The North Screening Post would be an approximately 4,000 square foot, one-story building, located just north of Alexander Hamilton Place NW. This building would function as a dedicated screening post for badged staff and contractors entering from the south side of campus. Cleared personnel and visitors would exit this building at the north elevation into the secure boundary of the White House complex. The North Screening Post is designed to be visually consistent with the entrance pavilion. It would have stone and granite cladding, a flat roof, and an extended overhang supported by Doric columns on the north elevation.

During construction, Sherman Memorial and Sherman Plaza would be protected in place. Upon completion of the Project, Sherman Park would remain open to the public and accessible from the northeast and southeast pathways from 15th Street. Alexander Hamilton Place and E Street (north and south of the park) respectively would remain restricted to authorized vehicles and pedestrians. Trees removed during construction would be replaced or replanted around Sherman Park.

5.1.1 Effects Analysis

The Project would adversely affect several historic properties within the APE through changes in spatial organization, land use, vegetation, and views and vistas (see **Table 3**). The Project would also adversely affect the integrity of design and setting for several historic properties within the APE (see **Table 4**).

Overall, the Project would have an **adverse effect** on the following historic properties:

- General William Tecumseh Sherman Memorial
- U.S. Department of the Treasury
- Lafayette Square Historic District
- National Mall Historic District
- President's Park South Historic District
- Pennsylvania Avenue National Historic Site
- Plan of the City of Washington (L'Enfant-McMillan Plan)

Changes to historic properties that would result from the Project and why these changes would result in **adverse effects** are described below.

General William Tecumseh Sherman Memorial, National Mall Historic District, President's Park South Historic District, and the Pennsylvania Avenue National Historic Site

The **adverse effect** to the General William Tecumseh Sherman Memorial, National Mall Historic District, President's Park South Historic District, and the Pennsylvania Avenue National Historic Site would result from changes to the design and setting of the Sherman Memorial and Sherman Park due to the construction of the above-ground entrance pavilion and North Screening Post. During large events, increased security presence, equipment, and visitor queuing also have the potential to change aspects of historic setting, feeling, and association within Sherman Park. This project would alter the historic setting of the Sherman Memorial, as well as those historic properties for which Sherman Park and/or the memorial is specifically identified as a key contributing feature, including the National Mall and President's Park Historic Districts and the Pennsylvania Avenue National Historic Site. In particular, reciprocal, character-defining views between the open lawn of the Ellipse, President's Park South, Sherman Park, and Pennsylvania Avenue at Sherman Park would be altered by the new above-ground buildings. Additionally, the new entrance pavilion would become a terminal feature when looking west-southwest from Pennsylvania Avenue, which is a contributing vista within the Pennsylvania Avenue National Historic Site.

The project would also result in alteration or replacement of some contributing landscape features within President's Park South, including spatial organization, vegetation, and circulation, although these changes would be limited to the westernmost side of Sherman Park. The majority of contributing landscape features would remain intact and unaltered, with approximately fewer than 25 percent affected by removal, replacement, or relocation (see **Table 3**).

U.S. Department of the Treasury

The **adverse effect** to the U.S. Department of the Treasury derives from the construction of the North Screening Post within the NHL boundary as well as some diminishment of historic setting. The new above-ground structures would impact views to and from the South Wing steps and south plaza as well as the partial obstruction of the U.S. Department of the Treasury's prominent southwest corner by the North Screening Post. Views south and west from the U.S. Department of the Treasury and its grounds were intended to provide semi-open and long vistas toward the White House grounds, President's Park South, and the Ellipse. These vistas would be partially obstructed by the new above-ground components of the visitor's center facility. In addition, alterations to features within the NHL boundary are anticipated, including temporarily removing and restoring the wall along the driveway around the west side of the building, and removing and replacing the entrance gate to the driveway.

The placement and scale of the above-ground buildings for the White House VSF was intended to be respectful of the north-south axial vista between Treasury's south plaza and Sherman Plaza. Additionally, the placement along East Executive Avenue aligns with the spirit of previous concepts for a more formal transition from Pennsylvania Avenue to the White House grounds, including the 1964, 1968, and 1974 renewal plans for Pennsylvania Avenue.

Lafayette Square Historic District

The **adverse effect** to the Lafayette Square Historic District derives from the construction of the North Screening Post within the district's NHL boundaries. While situated at the district's southern edge where it is not visible from many of the contributing resources, there is a direct line of sight between the North Screening Post and Lafayette Square – the centerpiece of the district. The historic district is also characterized by the open space of the square as well as the open space that extends along West and East Executive Avenues adjacent to the White House. Any loss of that open space results in a change to the district's historic setting, feeling, and association.

Additionally, construction of the North Screening Post may interact or overlap with security enhancements proposed at Lafayette Park that are also likely to result in adverse effects. Thus, this finding of adverse effect to the Lafayette Square Historic District considers this additional planned action and its potential effects.

The Plan of the City of Washington (L'Enfant-McMillan Plan)

The **adverse effect** to the Plan of the City of Washington would derive from the replacement of the largely open, green space of the Project Area with two above-ground buildings and resulting alterations to several significant views and vistas. The most altered views would be those from the corner of Pennsylvania Avenue NW and 15th Street NW looking west and southwest, and from E Street NW between President's Park and the Ellipse looking northeast toward Sherman Park and the U.S. Department of the Treasury beyond, as well as linear views within East Executive Park. Additionally, the new entrance pavilion would become a terminal feature when looking west-southwest from Pennsylvania Avenue, which is a contributing vista within Reservation 1 of the Plan of the City of Washington.

In addition to the effects described above, Alternative 1 may result in **cumulative effects** due to interaction or overlap with the reasonably foreseeable effects of other, unrelated actions. The NPS has identified planned actions that are anticipated to occur within the vicinity of the proposed action area. Planned actions include the East Wing Modernization Project, exterior upgrades to the Eisenhower Executive Office Building, and security enhancements to Lafayette Park. Therefore, there is the likelihood for additive impacts to the President's Park South and Lafayette Square Historic Districts, in particular.

The Project would also have **no adverse effect** on the following historic properties within the APE:

- Fifteenth Street Financial Historic District
- Hotel Washington
- Willard Hotel
- Federal Triangle Historic District
- Bulfinch Gatehouses

For the above resources, the Project Area is not considered a contributing or character-defining feature to their historical association or setting. The North Screening Post would sit just within the southwest corner of the Fifteenth Street Financial Historic District boundary but would not diminish its integrity of setting, feeling or association because views to and from the district's organizational spine (15th Street) are negligible and the district is not characterized by its open space. Views to and from the Hotel Washington, Willard Hotel, Bulfinch Gatehouses, and the Federal Triangle Historic District from the Project area would be negligible due to intervening distance, vegetation, and other buildings. Thus, their integrity of setting, feeling, and association would not be impacted or diminished. As such the project would have **no adverse effect** to the Fifteenth Street Financial Historic District; Hotel Washington; Willard Hotel; the Federal Triangle Historic District; and the Bulfinch Gatehouses.

The potential effects on archeological resources are assessed in a Phase 1A Archeological Assessment prepared in conjunction with this Assessment of Effects report. Based on a review of the history of the property, the project area has potential to contain archeological evidence of historic resources and deposits. The project will have an adverse effect on archeological resources, if present. A Phase IB Archeological survey, along with construction monitoring, will be completed in order to identify and evaluate archeological resources.

Table 3. Proposed Alterations to Contributing Landscape Characteristics within the Project Area

Landscape Character Area / Landscape Characteristic	Landscape Feature	Proposed Alterations Under Alternative 1: Preferred Alternative
Sherman Park / Spatial Organization	Rectilinear property boundary	Change to the spatial organization along the western side. Alteration.
Sherman Park / Spatial Organization	Formal geometric layout of the plaza with equestrian statue as a focal point	Change to the design and setting of the west side with the introduction of an entrance pavilion and changes to circulation. Alteration.
Sherman Park / Spatial Organization	Orthogonal plantings of trees in the four quadrants formed by the diagonal walks from Sherman Plaza	Removal of trees in west quadrant. Alteration.
Sherman Park / Natural Systems and Features	Descending topography from north to south and east to west	Change to the topography with the construction of the below-grade screening facility. Alteration.
Sherman Park / Natural Systems and Features	Level terrace associated with the monument plaza	No change.
Sherman Park / Land Use	Commemoration	No change.
Sherman Park / Land Use	Recreation	No change.
Sherman Park / Cultural Traditions	Public gathering	No change.
Sherman Park / Circulation	Alexander Hamilton Place NW	No change.
Sherman Park / Circulation	East Executive Park	No change.
Sherman Park / Circulation	Sidewalks along Alexander Hamilton Place NW and East Executive Park	No change.
Sherman Park / Circulation	Diagonal walks	No change.
Sherman Park / Circulation	Sherman Plaza	Change to the setting. Alteration.
Sherman Park / Vegetation	Willow oak plantings	Removal for construction. Replacement.
Sherman Park / Vegetation	American elm plantings	Removal for construction. Replacement.
Sherman Park / Vegetation	Flower beds	Removal for construction. Replacement.

Landscape Character Area / Landscape Characteristic	Landscape Feature	Proposed Alterations Under Alternative 1: Preferred Alternative
Sherman Park / Vegetation	Turf	Removal for construction. Replacement.
Sherman Park / Buildings and Structures	General William Tecumseh Sherman Statue	Change to the historic setting. Alteration.
Sherman Park / Buildings and Structures	Freestanding walls at the junction of the diagonal walks and Sherman Plaza	No change.
Sherman Park / Views and Vistas	Views to the Sherman Statue from the surrounding landscape	Change to the setting with the addition of the entrance pavilion; change of views to the statue from the west. Alteration.
Sherman Park / Views and Vistas	Reciprocal views between the Sherman Plaza, Hamilton Statue, and south entrance to the U.S. Department of the Treasury	Strengthened relationship between Sherman Plaza, Hamilton Statue, and south entrance to the U.S. Department of the Treasury. Alteration
Sherman Park / Views and Vistas	Views of the Washington Monument	No change.
Sherman Park / Small-scale Features	Lampposts (Millet-style)	Removal for construction. Alteration.
East Executive Park / Spatial Organization	Linear corridor defined by fences and rows of trees, containing vehicular and pedestrian circulation	Change to the design with addition of the North Screening Post. Alteration.
East Executive Park / Natural Features and Systems	Topography gently descending from north to south	No change.
East Executive Park / Land Use	Administrative Office	No change.
East Executive Park / Land Use	Ceremonial	No change.
East Executive Park / Land Use	Recreation	No change.
East Executive Park / Land Use	Security	No change.
East Executive Park / Circulation	East Executive Avenue	Change to the setting with the addition of the North Screening Post. Alteration.
East Executive Park / Circulation	Pedestrian walk system	Change to the setting with the addition of the North Screening Post. Alteration.
East Executive Park / Buildings and Structures	East Executive Park gates (south pair)	Change to the setting with the addition of the North Screening Post. Alteration.
East Executive Park / Views and Vistas	Linear framed view extending north-south along East Executive Avenue	Change to the setting with the addition of the North Screening Post. Alteration.
Grounds of the U.S. Department of the Treasury / Spatial Organization	Rectilinear parcel with a central rectangular building framed by city streets	No change.
Grounds of the U.S. Department of the Treasury / Spatial Organization	Perimeter boundary in the form of a wall, piers, fences, and gates	Change to the setting. Alteration.
Grounds of the U.S. Department of the Treasury / Natural Systems and Features	Overall slope descending from north to south	No change.

Landscape Character Area / Landscape Characteristic	Landscape Feature	Proposed Alterations Under Alternative 1: Preferred Alternative
Grounds of the U.S. Department of the Treasury / Land Use	Recreation	No change.
Grounds of the U.S. Department of the Treasury / Land Use	Security	No change.
Grounds of the U.S. Department of the Treasury / Circulation	Areaway	No change.
Grounds of the U.S. Department of the Treasury / Buildings and Structures	Perimeter fence and retaining walls	Removal for construction. Replacement.
Grounds of the U.S. Department of the Treasury / Views and Vistas	View from the elevated position of the monumental stairs toward Sherman Park, the Sherman Statue, and Washington Monument	Alteration.

5.2 Alternative 2: No Action

The No Action Alternative would continue the current visitor screening procedures, in which White House visitors arrive at the corner of 15th Street and Alexander Hamilton Place and begin queuing within the hardscape pathways in Sherman Park. Visitors would continue to be processed through an initial security check point under temporary tent structures and proceed to East Executive Avenue for security processing. Visitors would continue to enter a double-wide trailer on East Executive Avenue and be processed through a single lane of security equipment. Once processed, visitors would exit the screening area and walk northbound on East Executive Avenue to proceed to the East Wing.

5.2.1 Effects Analysis

Alternative 2 (No Action Alternative) would retain the current use of trailer and temporary tents, which, while reversible, are still generally incompatible with the historic character of the surrounding area and impact significant views and vistas. While intended to be temporary, the tents are a constant presence due to the need to support White House and Garden tours as well as the number of other events held routinely by the White House. Additionally, Sherman Park would continue to be frequently inaccessible to the public due to closures when visitors are queuing for special events or security protocols are implemented. Thus, this alternative would continue to diminish the integrity of setting, feeling, and association for some historic properties within the APE (see **Table 4**).

Alternative 2 would have an **adverse effect** on the following historic properties:

- General William Tecumseh Sherman Memorial
- Pennsylvania Avenue National Historic Site
- President's Park South Historic District

Impacts to historic properties from Alternative 2 that would result in **adverse effects** are described below.

General William Tecumseh Sherman Memorial

The **adverse effect** to the General William Tecumseh Memorial would result from changes to the setting, feeling, and association of the historic object due to the presence of incompatible, temporary structures within its immediate vicinity.

Pennsylvania Avenue National Historic Site and President's Park South Historic District

The **adverse effect** to the Pennsylvania Avenue National Historic Site and the President's Park South Historic District would result from the continued presence of incompatible structures within key areas, such

as the East Executive Park area of President's Park, and the continued use of temporary tents along Alexander Hamilton Place. These structures alter the contributing spatial organization by retaining incompatible structures within a formerly open linear corridor. The structures would also continue to alter the setting of contributing circulation features, including East Executive Avenue, the East Executive Park gates, and the pedestrian walk system. The contributing linear, framed view along the north-south East Executive Avenue axis would continue to be diminished by the presence of incompatible, temporary structures at the southern end of this axis.

Alternative 2 would have **no adverse effect** on the following historic properties within the APE:

- U.S. Department of the Treasury
- Hotel Washington
- Willard Hotel
- Lafayette Square Historic District
- National Mall Historic District
- Federal Triangle Historic District
- Fifteenth Street Financial Historic District
- Plan of the City of Washington (L'Enfant-McMillan Plan)
- Bulfinch Gatehouses

Alternative 2 would have **no adverse effect** on the U.S. Department of the Treasury; Hotel Washington; the State, War, and Navy Building (Eisenhower Executive Office Building); the White House; Willard Hotel; Lafayette Square Historic District; National Mall Historic District; Federal Triangle Historic District; the Fifteenth Street Financial Historic District, the Plan of the City of Washington (L'Enfant-McMillan Plan), and the Bulfinch Gatehouses due to overall negligible visibility of the temporary structures as a result of intervening distance, vegetation, and other buildings.

Alternative 2 would have no effect on archeological resources.

Table 4. Summary Assessment of Effects, Historic Properties within APE

Resource	Alternative 1: Preferred Alternative	Alternative 2: No Action	Additional Considerations under Section 110(f)
General William Tecumseh Sherman Memorial, NRHP	- Change to the immediate historic setting. - Change to reciprocal and significant views between the memorial and the U.S. Department of the Treasury, President's Park South Historic District, and the National Mall Historic District. Adverse effect.	Long-term, temporary change to the setting. Adverse effect.	N/A
U.S. Department of the Treasury, NRHP, NHL	- Change to the historic setting of the building's south wing and south plaza. - Partial obstruction of visibility of the south wing's southwest corner by the North Screening Post. - Construction of the North Screening Post within the property's NHL boundaries diminishes the integrity of its historic setting. Adverse effect.	No adverse effect.	- Alternative 1 would adversely affect an NHL. - Other locations would not be suitable for this Project due to the need to site a facility proximate to the East Wing and within an area covered by established security perimeters and protocols for operational efficiency. - Effects were minimized during the consultation process by moving the above-ground portion of the White House VSF from E Street NW to along East Executive Avenue and modifying the design to ensure compatibility with the U.S. Department of the Treasury.
Bulfinch Gatehouses, NRHP	No adverse effect.	No adverse effect.	N/A
Hotel Washington, NRHP	No adverse effect.	No adverse effect.	N/A
Willard Hotel, NRHP	No adverse effect.	No adverse effect.	N/A
President's Park South Historic District, NRHP	Change to the historic setting of President's Park South.	Long-term, temporary change to the design and setting. Adverse effect.	N/A

Resource	Alternative 1: Preferred Alternative	Alternative 2: No Action	Additional Considerations under Section 110(f)
	- Change to Sherman Park's historic setting, feeling, and association during large events, due to increased security presence, equipment, and visitor queuing. - Change to reciprocal and significant views between President's Park South and Sherman Park, both of which are contributing resources. Adverse effect.		
Lafayette Square Historic District, NRHP, NHL	Construction of the North Screening Post within the district's NHL boundaries reduces character-defining open space and diminishes the integrity of setting. Adverse effect.	No adverse effect.	- Alternative 1 would adversely affect an NHL. - Other locations would not be suitable for this Project due to the need to site a facility proximate to the East Wing and within an area covered by established security perimeters and protocols for operational efficiency. - Effects were minimized during the consultation process via design modifications, including reduction of the North Screening post width, removal of the balustrade, and introduction of specimen trees on the north side for screening to and from the district.
National Mall Historic District, NRHP	Change to reciprocal and significant views between the Ellipse and Sherman Park, both of which are contributing resources. Adverse effect.	No adverse effect.	N/A

Resource	Alternative 1: Preferred Alternative	Alternative 2: No Action	Additional Considerations under Section 110(f)
Pennsylvania Avenue National Historic Site, NRHP	Change to the contributing vista looking west from Pennsylvania Avenue at 15th Street NW. Adverse effect.	Long-term, temporary change to the design and setting. Adverse effect.	N/A
Plan of the City of Washington (L'Enfant-McMillan Plan), NRHP	- Changes to the design intent and historic setting of Reservation 1, an important element of the Plan. - Change to a primary vista within the Plan, from the Ellipse north and east toward Sherman Park and the U.S. Department of the Treasury. Adverse effect.	No adverse effect.	N/A
Federal Triangle Historic District, NRHP	No adverse effect.	No adverse effect.	N/A
Fifteenth Street Financial Historic District, NRHP	No adverse effect.	No adverse effect.	N/A

6.0 Avoidance, Minimization, and Mitigation Measures

A total of three (3) Consulting Parties meetings have occurred to date, resulting in numerous design modifications to Alternative 1 (Preferred Alternative) that have avoided and minimized some adverse effects. Consulting Parties are also in the process of reviewing and commenting on a draft Memorandum of Agreement (MOA) that identifies proposed mitigation for adverse effects that cannot be reasonably avoided. Avoidance, minimization, and mitigation measures identified to date include the following:

6.1 Avoidance

- Views of the General William Tecumseh Sherman statue would not be obstructed by the facility.
- The Sherman Memorial would be protected throughout construction. Protection methods would be guided by a construction protection plan to be approved by NPS prior to the start of construction.
- Trees and vegetation that are to remain within the construction area would be protected throughout construction. Protection methods would be guided by a construction protection plan to be approved by NPS prior to the start of construction.

Additionally, several alternative locations were considered for the Project that would have had a greater impact on historic properties. These options would have included larger above-ground components and greater changes to significant views and vistas. Potential options considered and their potential impacts include:

- The Lily Triangle / Below East Executive Avenue and E Street NW option's above-ground components would be closer to the White House viewshed. This option would also require additional underground disturbance and would have been closer to the White House viewshed.
- The North or South Treasury (below-ground plaza/partial courtyard infill) option would have resulted in significant changes to the U.S. Department of the Treasury entry plaza, main entrance steps, and reduction of the grass courtyards. An additional structure, parallel to Pennsylvania Avenue, would be needed to connect over the Annex Tunnel.
- The Sherman Park (above-ground) option would have included an entirely above-ground and highly visible building within Sherman Park. Existing trees in west quadrant of Sherman Park would require removal with no adequate space for replacement plantings.
- The Sherman Park (below-ground, east entry plaza) option would have physical impacts to three quadrants of Sherman Park and require additional below-grade space to connect to the primary screening area, increasing complexity and overall impact.
- The Sherman Park (below-ground, north entry plaza) option would have extensive ramping and associated impacts to a larger portion of Sherman Park required to place the facility below ground. The entry plaza would intrude on the reciprocal views between Sherman Plaza, the Alexander Hamilton statue, and the south entry of the U.S. Department of the Treasury.
- The Sherman Park (recessed entrance plaza) option would have physical impacts to the southern portion of Sherman Park and a greater impact on views toward the U.S. Department of the Treasury's south facade as well as the relationship between the U.S. Department of the Treasury's south plaza and Sherman Plaza.
- Shifting the North Screening Post/Exit further north along East Executive Avenue or to the north or south of the U.S. Department of the Treasury would affect the views of the Treasury. This alternative would also conflict with existing underground utility infrastructure.
- The Department of Commerce Building entrance complex option would require much of the facility to be constructed underground, which would be cost-prohibitive.

6.2 Minimization

- The facility would be located primarily underground and along East Executive Avenue, limiting physical impacts to Sherman Park, limiting visual impacts to the memorial, and respecting the axial relationship between Sherman Park and U.S. Department of the Treasury's south plaza.
- The above-ground buildings would employ a low-profile, classically inspired design that would be compatible with the surrounding area without competing with the size of nearby landmark buildings.
- The proposed project would increase public access to Sherman Park, consistent with the historical purpose and use of the park, as public access would no longer be restricted during tour hours and special events under normal conditions, unless heightened security concerns are present.

6.3 Mitigation

- Comprehensive landscape treatment and maintenance plan for Sherman Park to reestablish the park from trees removed due to age and construction as well as a recurring maintenance schedule to ensure their health and success.
- Permanent indoor exhibit on the history of Sherman Park within the primary entry space of the new visitor's center. The exhibit would broadly address the history of Sherman Park and the land's early use by the Department of the Treasury.
- Historic American Landscape Survey (HALS) documentation of Sherman Park prior to construction.
- Full updates, including expanded historic contexts, for existing NRHP Nominations for several resources within the project's APE.

These and other mitigation measures (including archeological investigations) will be discussed and finalized with consulting parties and codified in a final MOA.

6.4 Compliance with Section 110(f)

Section 110(f) of the NHPA requires that, where an undertaking may directly and adversely affect an NHL, federal agencies, to the maximum extent possible, must undertake planning and actions necessary to minimize harm to the NHLs. Through both the design development and Section 106 consultation processes, harm to NHLs as a result of the Project was minimized to the maximum extent possible. While other alternatives were considered, none of them would have completely avoided potential adverse effects to historic properties, including NHLs, and several would likely have resulted in additional impacts to both the U.S. Department of the Treasury and the Lafayette Square Historic District, as discussed in **Sections 1.1** and **6.1**. In addition, other site locations would not be able to support organized visitor movement while simultaneously allowing White House daily operations to continue uninterrupted.

The Preferred Alternative provides sufficient space and standoff from the White House to process visitors for safe entrance onto the grounds. The west portion of Sherman Park was ultimately chosen for its ability and capacity to house the procedures, screening technologies, and infrastructure needed to provide a controlled environment and adequate security. In addition to minimizing adverse effects to cultural resources, other considerations for the siting of the White House VSF included programmatic requirements, flow of security operations, access for visitors from public sidewalks, exiting the facility into the controlled perimeter, site integration and constraints, existing grade and sidewalk elevations, and avoidance of major utility infrastructure throughout the area and the Treasury Annex tunnel on the north side of Sherman Park. The Preferred Alternative avoids significant visual impacts to key historic viewsheds while maintaining critical vehicle operations and acceptable solutions for utility and infrastructure conflicts.

Project planning to **avoid and minimize** harm to NHLs within the Project Area was part of the early site selection and conceptual design phase going back to 2012, as described in **Section 1.1**. Once the need to screen visitors in the area of Sherman Park was determined due to the infeasibility or additional harm resulting from the other alternatives, the Section 106 consultation process served to find ways to further avoid and minimize harm to the two NHLs in the APE, particularly the U.S. Department of the Treasury due to its proximity to the aboveground structures. During that process, placement of the above-ground portions of the White House VSF shifted farther away from the U.S. Department of the Treasury. The design of the

North Screening Post/Exit was modified to enhance compatibility with the Lafayette Square Historic District. These changes, in addition to those described in **Section 6.2**, prioritized the historic spatial relationship between Sherman Park and the NHLs, while still meeting the goals and objectives of the undertaking.

Specific planning and actions to minimize harm to each NHL are discussed below. These actions demonstrate preparation of design studies and materials to convey a comprehensive understanding of impacts to the NHLs, efforts to fully assess effects to them, and the consistent prioritization of minimum harm to these nationally significant resources in decision-making.

U.S. Department the Treasury

The original Preferred Alternative presented to Section 106 Consulting Parties in April 2026 was a primarily below-grade facility with a recessed entrance plaza located in the southern portion of Sherman Park. This alternative was determined to result in an adverse effect on the U.S. Department of the Treasury. Consulting Parties identified additional concerns regarding the design of the recessed entrance plaza and potential impacts on the NHL.

Based on comments received during the April 2026 Consulting Parties meeting, two additional re-design concepts were prepared and presented to Consulting Parties in May 2026. The first concept retained the entry pavilion on the south side of Sherman Park but with a slightly smaller footprint, lower height, and a green roof. The second concept was a fully above ground entrance pavilion that shifted to East Executive Avenue on the west side of Sherman Park. The latter concept (the current Preferred Alternative) was determined to have a lesser impact on the U.S. Department of the Treasury. It **minimized** the following key adverse effects on the U.S. Department of the Treasury, in particular. First, the new location fully removed the entrance pavilion out of the historic north-south viewshed between E Street, the Sherman Statue and Sherman Park, and Treasury's south plaza and façade. Second, the new design better aligned with the formality and dignity of the surrounding buildings, particularly the U.S. Department of the Treasury and White House, while still reading as a secondary building.

Lafayette Square Historic District

The original Preferred Alternative presented to Section 106 Consulting Parties in April 2026 included a North Screening Post that had been sited for the least encumbered view toward the Lafayette Square Historic District, within the existing site constraints. The overall roof elevation was set as low as possible. Based on design-related comments received during the April 2026 meeting, a slightly modified design that **minimized** adverse effects was prepared and presented to Consulting Parties in May 2026. The overall width of the North Screen Post was reduced from 41 feet to 37 feet wide, the balustrade at the roofline was replaced with a simplified cornice, and large specimen trees were introduced to the north side facing the Lafayette Square Historic District as a green buffer to and from the district.

7.0 References Cited

Advisory Council on Historic Preservation (ACHP). "National Historic Preservation Act." Advisory Council on Historic Preservation. Accessed March 9, 2026. <https://www.achp.gov/digital-library-section-106-landing/national-historic-preservation-act>

Janke, Lucinda Proute. "The President's Park." *White House History* No. 27 (2010). <https://www.whitehousehistory.org/the-presidents-park>

McDermott, John D. *Lafayette Square Historic District National Register of Historic Places Nomination*. Washington, DC, 1970.

Morton III, W. Brown. *Executive Office Building National Register of Historic Places Nomination*. Washington, DC, 1971.

National Park Service (NPS).

Cultural Landscapes Inventory President's Park South, The White House. National Park Service. 2016.

Foundation Documents: The White House President's Park, Washington, D.C. National Park Service, September 2014.

"National Historic Preservation Act of 1966." National Park Service. Accessed March 9, 2026. <https://www.nps.gov/subjects/archeology/national-historic-preservation-act.htm>

National Register Nomination Form for Pennsylvania Avenue Historic Site. 2007.

National Archives. <https://www.archives.gov/federal-register/codification/executive-order/11593.html>

Robertson, Ann. "Little House in the Nation's Capital." Girl Scout History Project. 2024. <https://gshistory.com/2024/01/09/the-first-girl-scout-little-house/>.

United States Executive Office of the President, Office of Administration. *The Old Executive Office Building: A Victorian Masterpiece*. 1984.

Appendix A:
Current Photographs

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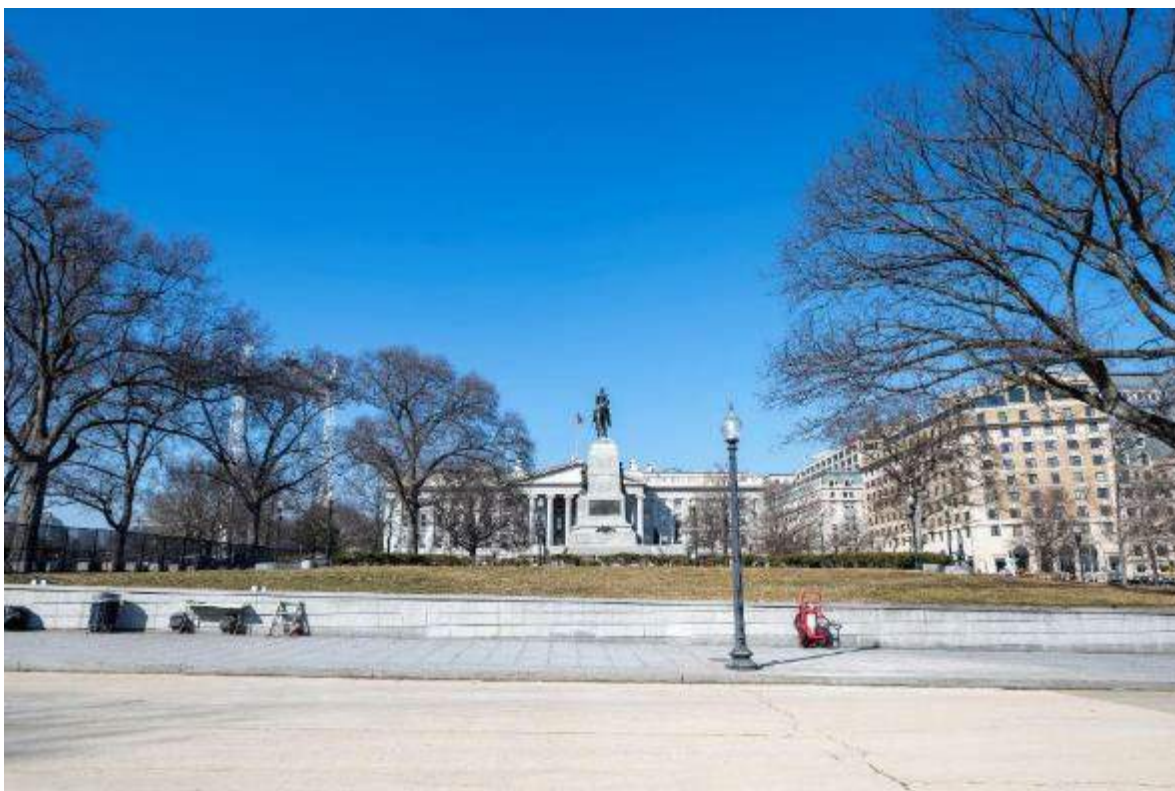
Sherman Park, northeast corner, looking southwest.



Sherman Park, east side, looking west.



Sherman Park, southeast corner, looking northwest.



Sherman Park, south side, looking north towards U.S. Department of the Treasury.



Sherman Park, southwest corner, looking northeast towards U.S. Department of the Treasury (left background) and Hotel Washington and Willard Hotel (right background).



Sherman Park, sidewalk and steps from intersection of E Street NW and 15th Street NW to the Sherman Monument, looking northwest.



Sherman Park, lawn south of Sherman Monument, looking north towards U.S. Department of the Treasury.



Sherman Park, intersection of E Street NW and East Executive Avenue, looking northwest.



East Executive Avenue, existing visitor screening trailer, looking north, U.S. Department of the Treasury is on the far right.



East Executive Avenue, existing visitor screening trailer, looking southeast, Washington Monument on left background.



East Executive Avenue, temporary screening tents and equipment for large events, looking south.

Appendix B:
Renderings and Elevation Drawings of Preferred Alternative

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Rendering of the Project, aerial view of Sherman Park looking northwest towards the U.S. Department of the Treasury and White House.



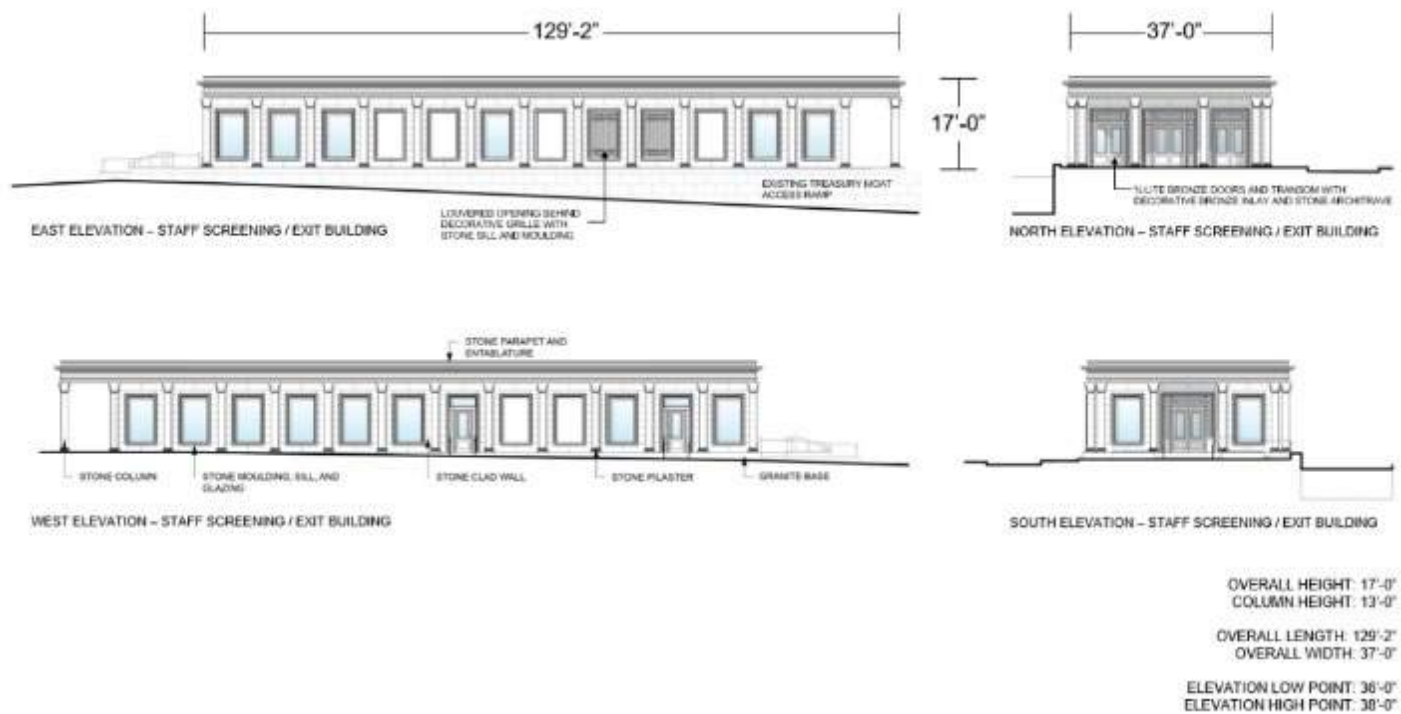
Rendering of the Project, looking northwest at the proposed entrance pavilion from the intersection of E Street NW and 15th Street NW.



Rendering of the Project, looking southwest at the proposed entrance pavilion from Alexander Hamilton Place NW and 15th Street NW.



Rendering of the Project, looking west from Sherman Plaza along new walkway leading to the entrance pavilion.



Elevation drawing showing the east and west elevations and relationship of the entrance pavilion (*left*) and North Screening Post (*right*).