

National Park Service  
US Department of the Interior



The White House and President's Park

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## **Finding of No Significant Impact**

### **White House East Wing Modernization and State Ballroom Environmental Assessment**

Washington, DC

NPS-25012

Recommended:

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Deputy Director, National Park Service

Approved:

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Comptroller, Exercising the Delegated Authority of the Director, National Park Service

## **Introduction**

The National Park Service (NPS) prepared an environmental assessment (EA) consistent with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.), the Department of the Interior (DOI) NEPA regulations, 43 CFR part 46, and the 2025 DOI Handbook of NEPA Implementing Procedures (516 DM 1 Handbook). This Finding of No Significant Impact (FONSI) documents the final determinations and approvals for NPS actions related to the East Wing modernization and State Ballroom construction. The statements and conclusions reached in this FONSI are based on documentation and analysis provided in the EA and associated decision file.

Congress established the White House and its grounds as a unit of the National Park System in 1961 and it is managed by the NPS through President's Park. The White House itself has expanded since its original construction and has been subject to many major and minor renovations since its first cornerstone was laid in 1792. Although the White House has undergone expansions and many presidents have proposed large changes to the White House, its design remains a timeless representation of stability and resilience in our nation (Bushong 2005). The White House sits within President's Park, which includes Lafayette Square, the First Division Monument, Sherman Park, and various sites in and around the Ellipse.

## **Purpose and Need for Action**

The purpose of the proposed action is to establish a permanent, secure event space within the White House grounds that meets presidential priorities for capacity and dignified official functions, eliminates reliance on temporary tents and associated infrastructure strains, and protects the historic integrity and cultural landscape of the White House and its grounds while maintaining a high-quality visitor experience.

The Comprehensive Design Plan for the White House and President's Park (2000) identified the need for expanded event space to address growing visitor demand and provide a venue suitable for significant events. Successive administrations have recognized this need as an ongoing priority. To meet this need, the Executive Office of the President outlined three functional goals for any permanent event space: (1) immediate adjacency to the Executive Mansion (2) a direct ceremonial procession from the East Room into the venue, and (3) secure second-story access from the Executive Residence.

## **Selected Action**

The selected action will establish a permanent, secure event space within the White House grounds. This will be accomplished by replacing the existing East Wing of the White House with a new building that will house the White House State Ballroom.

## **Deconstruction and Design**

The existing East Wing and East Colonnade will be deconstructed. Prior to deconstruction, the NPS will remove all museum collections, artifacts, and paintings (collectively "museum objects") from the East Wing and some museum objects from the Executive Mansion. Museum objects

from the East Wing may be relocated to other areas within the White House, which could result in temporary removal or modification of interior designs or museum objects in those spaces. If removed from the White House, all items will be stored in accordance with White House standards to ensure proper preservation and accountability.

The interiors and exteriors of the East Wing and East Colonnade have been evaluated to identify historic fabric with potential for salvage and possible reuse. Both buildings will be documented as outlined in the Documentation section below prior to removal of any features or finishes. Selected interior features will be documented, removed, and stored for potential reinstallation including wood paneling, light fixtures, movie theater elements, and interior columns. Selected exterior features, such as exterior columns, Seneca sandstone, the East Wing commemorative cornerstone and bronze plaque from the 1942 renovation, wrought iron fencing and gate, the Kennedy Garden arbor, two fanlight windows from the East Colonnade, and cobblestone paving, will be documented, removed, and stored for potential reinstallation. Some interior and exterior features will be reinstalled at and around the new building.

The new building will be approximately 90,000 square feet and will be connected to the Executive Mansion through the East Colonnade. The East Colonnade will be renovated to include an enclosed second story that will provide direct access from the East Room to the State Ballroom, while maintaining ground-floor access to and from the Executive Mansion. Limited portions of the east façade of the Executive Mansion will be carefully removed to tie in both levels; stones removed for this work will be cataloged and reinstalled.

The exterior design of the new East Wing building will be compatible with the Executive Mansion through classical elements such as columns and pediments. Materials will include a white painted exterior, historically compatible windows and doors, and an architecturally compatible roof. Interior finishes will include stone slab flooring, decorative plaster moldings, and high-quality finishes for elevator cabs. Mechanical, electrical, and plumbing (MEP) upgrades will include custom chandeliers, fixture updates, and architectural grilles, along with advanced audio-visual (AV) system enhancements.

The second floor will contain the State Ballroom with capacity for over 1,000 guests, depending on final design configuration. The State Ballroom will allow flexible staging on the south or east sides and provide views to the west, south, and east. A flat tray ceiling with decorative chandeliers is proposed. The first floor will continue to serve as the visitor entrance to the building with monumental stairs to the ballroom and will house storage, mechanical equipment, and mission space. Ground-floor restrooms will support events on the South Lawn.

#### Construction and Staging

A temporary construction zone will be established near the East Wing until project completion (summer 2028). This zone will close Madison Place NW from H Street NW to E Street NW and portions of Pennsylvania Avenue NW, extending approximately 260 feet east and 350 feet west from the Madison Place NW centerline to non-construction or emergency vehicles. The construction area will extend south from the East Colonnade, with the South Drive as the western boundary and East Executive Drive as the eastern boundary. The construction zone will

extend south to Hamilton Avenue. The construction will not impede visitation to other parts of President's Park.

A tower crane will be erected on site, with its final location determined upon completion of the final design documents. Other heavy construction equipment will be used, and contractors will employ ground protection to prevent turf and utility damage. Given the project's size and duration, turf replacement and ground remediation, such as decompaction of compacted topsoil, are expected to occur during project closeout, along with the repaving of affected roadway areas.

### Landscaping

The selected action will expand the footprint of the East Wing, resulting in adjustments to landscaping in the project area. To accommodate the larger building, a variety of ornamental trees and shrubs will be removed from the project site. The commemorative Southern Magnolias on the east front of the East Wing will be removed due to the proposed footprint of the building (north magnolia planted in 1947, south magnolia planted in 1942 by Franklin D. Roosevelt). The East Garden will be carefully removed during construction and reinstalled similar to its existing design. The arbor in the East Garden will be removed, restored, and reinstalled in the East Garden once exterior construction is complete.

The brick pavers along the garden paths will be carefully removed. The bricks will be stored and ready to be relaid as part of the garden reinstallation. The fountain, including its statue, a centerpiece of the garden, will also be carefully dismantled and preserved for future reinstallation. Meanwhile, the Laura Bush Silver Linden Tree will be fenced and protected with a rigid barrier to ensure its safety throughout the construction period.

### Documentation

The NPS will continue to survey and record the current interior and exterior conditions of the East Wing, East Colonnade, and Jacqueline Kennedy Garden (East Garden) of the White House. The documentation consists of two components:

1. Digital Survey: A 3-dimensional digital survey of the property using Light Detection and Ranging (LiDAR) laser scanning equipment will be completed. Scanning will be conducted using Leica P50 and RTC360 terrestrial laser scanners. A Leica TS16i total station will be used to create a control network for the scanned data. A single three-dimensional model of the building and site will be completed.
2. High-Resolution Digital Photography: The NPS will capture high-resolution digital photographs of the building and site to include the primary interior and exterior spaces, significant features, and contextual views. Photographs will be taken using a Phase One medium-format digital system and a Canon R5 full-frame digital mirrorless system.

## **Finding of No Significant Impact**

A description of all potential environmental effects associated with the selected action and no action alternative is included in the EA, incorporated by reference herein. Consistent with the DOI NEPA Handbook, Section 1.2(b), the NPS evaluated the significance of the selected action, identified as the proposed action in the EA, by analyzing the potentially affected environment and the degree of the effects of the selected action. Significance is determined solely in relation to reasonably foreseeable adverse effects. The degree of effect is considered by evaluating both short-and-long term effects, both beneficial effects and adverse effects, effects on public health and safety, economic effects and effects on the quality of life of the American People. The NPS only completes a significance determination for the selected action and does not determine the significance of unselected alternatives.

The EA discloses the reasonably foreseeable effects of the selected action, including the combined effects of the selected action with those of past, ongoing, and anticipated future actions on the park's cultural resources and on visitor access and experience. While other park resources may experience some effects, those effects are minimal and were determined not to warrant detailed analysis in the EA. Accordingly, these resources are not discussed further here, as the anticipated effects are so minor that they have no potential to reach a level of significance. For a detailed description of impact topics considered but dismissed, see Appendix A of the EA.

### **Potentially Affected Environment**

A more detailed description of the potentially affected environment is included in the EA under the subheadings Current and Expected Future Conditions of the Environment if No Action is Taken.

The White House is the oldest public building in the District of Columbia and has served as the home and office of every U.S. president except George Washington. Together with its wings and grounds, the White House functions as the residence of the First Family, the workplace of the President and staff, a national park, and an evolving museum.

The White House and President's Park include three distinct cultural landscapes that were identified as contributing features to the L'Enfant Plan of the City of Washington, DC, a historic district listed in the National Register of Historic Places (NPS 1997): Lafayette Park, White House Grounds and The Ellipse. These cultural landscapes are fundamental to the park and provide the setting for the "President's Park" as defined by Pierre L'Enfant in 1791. Situated on a high point within the city, the White House is a focal point on the principal north-south axis of L'Enfant's plan. Views and vistas were among the most essential features of L'Enfant's plan. The White House grounds are dynamic, changing with the seasons and the needs of the Executive Office of the President. Vegetation is frequently moved or removed, and at times temporary event tents obstruct views of the White House and other features of President's Park.

The Executive Mansion encompasses approximately 55,000 square feet, not including the West and East Wings and colonnades. This historic main building is organized into three primary sections: the Ground Floor, the State Floor, and the Executive Residence floors. The East Wing, constructed in 1942, has undergone multiple renovations and provides office space for the First Lady and her staff, including the White House Social Secretary, Graphics and Calligraphy Office, and correspondence teams. It also serves as the public entrance for White House tours and special events held at the White House.

The White House hosts major public events such as the Garden Tours, the Easter Egg Roll, and the National Christmas Tree Lighting. President's Park offers open space for recreation, First Amendment expression, and community programming. The NPS provides visitor access, interpretation, and educational services throughout these areas (NPS 2014).

### Short and Long-term Beneficial and Adverse Effects

#### *Cultural Resources<sup>1</sup>- Cultural Landscapes*

Under the selected action, the White House Grounds Cultural Landscape, which was originally designed by Thomas Jefferson and later modified by the designs of Andrew Jackson Downing, Frederick Law Olmsted Jr., and others, will be altered through an expansion of the White House footprint and the addition of a larger structure on its east side. These changes will result in long-term adverse effects on the cultural landscape. Similarly, views of the White House from Lafayette Park and the Ellipse will be permanently altered due to the modifications to the East Wing. In the short term, construction activities, including the presence of equipment and the removal and replanting of vegetation, will result in temporary adverse effects on these landscapes. However, the EA also identifies long-term beneficial effects from eliminating the need for temporary tents and other temporary facilities to support large events.

Despite the adverse impacts identified in the EA, the selected action will not result in significant adverse impacts to the park's cultural landscapes. The selected action will not permanently alter the park's most critical view, the long vista connecting the White House, Washington Monument, and Jefferson Memorial. In addition, mitigation measures such as replanting historically significant trees, salvaging and reusing historic materials, and preserving or reinstalling garden features will help maintain continuity between the site's historic character and its contemporary functions. These measures ensure that significant elements of the landscape are preserved and adapted for continued use, supporting the conclusion that the selected action will not result in significant impacts to cultural landscapes. Finally, the historical significance of the park's cultural landscape reflects its continuous adaptation to meet the evolving needs of the Executive Office of the President. The selected action continues a long-standing tradition reflected in the park's enabling legislation of adapting the White House

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<sup>1</sup> This Decision Document does not address compliance with Section 106 of the National Historic Preservation Act. Section 106 does not apply to the White House or its grounds, because 54 U.S.C. § 307104 expressly exempts the White House grounds (along with the Supreme Court and Capitol) from all requirements of that statute. Undertakings occurring outside the White House or its grounds may be subject to Section 106 review.

grounds to accommodate essential executive functions. Thus, changes to the landscape for this purpose are consistent with its historic character and are not considered significant.

#### *Cultural Resources - Historic Buildings*

The White House is designated as a National Historic Landmark (NHL). Under the selected action, the existing East Wing will be deconstructed and replaced with a new building, resulting in the permanent loss of a component that has been integral to White House operations since 1942. This change will disrupt the historical continuity of the White House grounds and alter the architectural integrity of the east side of the property. The new building's larger footprint and height will dominate the eastern portion of the site, creating a visual imbalance with the more modestly scaled West Wing and Executive Mansion. Adding a second story to the East Colonnade will further modify the setting, contrasting with the single-story design of the West Colonnade and changing the traditional spatial organization and sightlines of the grounds. These changes will adversely alter the design, setting, and feeling of the White House and the grounds over the long-term. In addition, construction activities will also introduce temporary risks to the historic building, including noise, vibration, and potential settlement effects, which could affect the structural stability or finishes of the Executive Mansion and adjacent features.

The selected alternative will also provide long-term benefits by reducing reliance on temporary event infrastructure, minimizing wear on the grounds, and improving functionality for large gatherings through the addition of a permanent ballroom.

The selected action will result in a substantial change to one portion of the NHL. However, the essential features that make it nationally significant, particularly its role in establishing the nation's capital and its resilience during the War of 1812, will remain unchanged. Moreover, the NHL documentation identifies the period of significance as 1792-1955, a period that saw significant changes in the configuration of the White House, namely the addition of the East and West Wings. Therefore, the overall impact will not significantly affect the property's significance as an NHL and it retains the qualities that caused it to be designated as an NHL.

Further, mitigation measures, including documentation of the current East Wing as well as salvage and storage of some of the existing historic building materials, will be reused in the new modernized East Wing, and to ensure their availability for future preservation or restoration projects at the White House or for other significant buildings in the district. These efforts will support preservation efforts by providing hard-to-replicate or replacement building materials that can be used at the White House and other historic buildings in the area, including the Smithsonian Castle, limiting potential significant adverse impacts to these resources in the future.

The White House is also unique in that, while it is a historic structure, it continues to evolve to meet the operational needs of the Executive Office of the President. This ongoing adaptation is part of its historical significance. Thus, the selected action will not result in a significant adverse impact to historic buildings.

#### *Visitor Access and Experience*



President's Park, excluding the White House and its grounds, is open to the public without the need for a scheduled tour, however, temporary area closures may be in place due to events and activities. U.S. Secret Service operations may also temporarily affect access to areas of the park to ensure necessary security and safety for the adjacent White House grounds, its occupants, and the public. These closures are frequent, given the high level of activity that occurs in and around the park.

Under the selected alternative, certain areas within both President's Park and the White House and its grounds will become temporarily inaccessible. Visitors to these areas will also experience increased noise and visual intrusions, resulting in adverse effects. However, these impacts are expected to be temporary and will conclude with the completion of construction, anticipated to be summer 2028, limiting the duration and extent of the adverse impacts.

Construction will interrupt normal tour flow through the East Wing, necessitating rerouting (e.g., alternate entry point) or postponement. Historically, tours have been suspended or altered during renovations or heightened security conditions. At the time of the EA's preparation, new tour bookings have been paused while a collaborative group of White House, NPS, and U.S. Secret Service staff work to determine the best way to ensure public access to the White House as this project begins and for the duration of construction. While the selected alternative will temporarily alter the existing White House tour route and potentially reduce tour availability during construction, tours will continue in some capacity and will include access to the State Floor of the Executive Mansion. This will help minimize the overall impact on visitors seeking to tour the interior of the White House. Because these closures are temporary, limited to the construction period, and consistent with previous renovation practices, they do not constitute significant adverse impacts.

The removal of the current East Wing will result in a permanent adverse impact for those who value the experience of this specific space. However, in the long term, the selected alternative will provide a modernized East Wing and a permanent ballroom designed to enhance functionality, accessibility, and visitor amenities, while reducing reliance on temporary event spaces. Additionally, the documentation of the East Wing before deconstruction and potentially during the construction process will provide a new interpretive opportunity in the future. As a result, the loss of the existing structure is not considered a significant adverse impact. Collectively, these improvements will strengthen the White House's capacity to host large indoor events, reinforce its status as a national landmark, and contribute to an improved long-term visitor experience.

#### Effects on Public Health and Safety

The selected action will not result in significant adverse effects on public health and safety. As detailed in Appendix A of the EA, the project's limited grading area, short duration of construction equipment use, and minimal vehicle trips will not significantly affect regional air quality. Emissions will remain below applicable pollutant thresholds.



Vehicle traffic is already restricted on streets near the project area, and additional restrictions will be clearly marked and enforced to ensure public safety. Pedestrian access may also be limited or rerouted in certain areas, as described in the EA under Visitor Access and Experience, to maintain a safe environment during construction. Finally, the selected action does not involve the release of hazardous or solid waste or other hazards to human health.

### Economic Effects

NPS considered socioeconomic impacts but dismissed them from detailed analysis, as explained in Appendix A of the EA. While White House tours and visits to President's Park offer valuable experiences, they are not major economic drivers for the region. These sites are typically one of many stops for visitors, and temporary changes to tour availability or site access are not expected to significantly affect the regional economy, tourism sector, or local employment. Although construction may generate some limited opportunities for local businesses, these effects are expected to be minor and likely undetectable.

### Effects on the Quality of Life of the American People

As described in the EA, the selected action will affect visitor access and experience, resulting in both adverse and beneficial impacts. In the short term, temporary site closures and reduced tour capacity will create adverse effects. However, over the long term, these areas will reopen and remain accessible, benefitting the American people. The selected action will not significantly alter educational opportunities or public understanding of the park. As noted, White House tours will continue, allowing visitors to engage with the park's purpose and unique resources. The modernized East Wing and new State Ballroom will directly benefit the American people by expanding the White House's ability to host large indoor events, celebrate America's history through new interpretive opportunities, and create a symbolic space for events of national importance, reinforcing shared civic identity and pride. It will also directly benefit the American people by providing comfort facilities that may be used for outdoor events on the South lawn. The selected action will also indirectly benefit the American people by providing modern office space for the Executive Office of the President.

The selected action will not restrict the public's ability to consume, purchase, or use products from public lands. It will also have no impact on public services, traditional land and water use practices, or the cultural heritage of Native American communities. Additionally, the selected alternative will not affect passive recreational use of ecosystems.

### **Rationale for the Decision**

The proposed action to modernize the White House East Wing and construct a new State Ballroom is the selected action. The EA evaluated two alternatives: a no action alternative and proposed action, which is the selected action. In addition, the Executive Office of the President and the NPS considered several other options for renovating the East Wing and creating space for large events. These alternatives were dismissed from detailed analysis because they did not adequately support the functional goals identified by the Executive Office of the President. The no action alternative was not selected because it does not meet the project's purpose and

need, as it lacks a permanent, secure event space within the White House grounds, and will continue reliance on temporary tents and associated infrastructure.

As described in the EA, successive administrations, including the current one, and existing planning documents have consistently recognized the need for a secure event space capable of hosting large official functions without reliance on temporary tents and associated infrastructure. The selected action fulfills this need by providing permanent facilities to support the operational needs of the Executive Office of the President, including both office and large event space, in a manner consistent with the park's enabling legislation, described below.

Congress established the White House as a unit of the National Park System in 1961 and it is managed by the NPS through President's Park. The enabling legislation (Pub. L. No. 87-286, 75 Stat. 586 (1961)) directs the NPS to prioritize the preservation and interpretation of the museum character of the principal corridor on the ground floor and the main public rooms on the first floor of the White House. The legislation provides that NPS management of the park shall not conflict with the administration of the Executive Offices of the President or with the use and occupancy of the buildings and grounds as the home of the President and their family or for official purposes.

Although the number and format of White House tours will differ from past practice resulting in some temporary effects to the NPS's ability to interpret the unit, tours will resume as soon as practicable and will continue to include access the principal ground floor corridor and the public rooms on the State Floor of the Executive Mansion, consistent with the enabling legislation of the park. Some ground floor rooms adjacent to construction zones or temporarily repurposed as offices for East Wing staff will be unavailable during construction, but this limitation will be temporary, lasting only for the duration of construction. As a result, the selected action will continue to preserve and interpret the museum corridor and principal public rooms of the White House, ensuring that visitor access and the park's core interpretive mission are maintained.

Additionally, under the selected action, museum objects on display in the East Wing and some objects in the Executive Mansion will be relocated or removed. Items not currently in use or on display are curated or stored. The routine removal of museum objects from the White House and off-site storage of those objects when they are not in use or being displayed is consistent with the park's enabling legislation and institutionalized through longstanding regular practice.

As described in the EA, the White House is unique in that, while it is an historic building, it is also a building that has evolved over time. Since 1805, Presidents have expanded and updated the White House to meet the needs of the Executive Office of the President. The selected action is consistent with this historic pattern of use and with the park's enabling legislation. Finally, as further explained in the NPS's Non-Impairment Determination (Appendix A), the action will not result in impairment of, or unacceptable impacts to, the park's resources.

In summary, the selected action best meets the project's purpose and need by providing permanent, secure space for large official events within the White House grounds, eliminating reliance on temporary tents. It aligns with the long-standing functional goals of the Executive Office of the President, meets the current operational needs of the Executive Office of the President, and is consistent with the White House's historical evolution and the park's enabling legislation. The action maintains public access to key interpretive areas, and ensures that the museum character of the principal ground floor corridor and State Floor public rooms is upheld. As documented in the EA and the Non-Impairment Determination attached, the selected action will not result in significant environmental impacts or impair the park's resources, allowing the NPS to continue fulfilling its stewardship and interpretive mission.

## **Decision**

Based on the information contained in the EA and described above, the NPS has determined that the selected action does not constitute a major federal action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). Therefore, an EIS will not be required. Lastly, the NPS certifies that it has considered all relevant information raised during the NEPA process and that the NEPA process is closed (516 DM 1 Handbook § 4.1).

## Appendix A

### Non-Impairment Determination

#### Compliance with National Park Service (NPS) Management Policies Unacceptable Impacts and the No-Impairment Standard

As described in 2006 NPS Management Policies (Management Policies) (NPS 2006), Section 1.4.4, the National Park Service Organic Act of 1916 (54 USC 100101) prohibits the impairment of park resources and values. *Guidance for Non-Impairment Determinations and the NPS NEPA Process* (NPS 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA). The NPS completed a non-impairment analysis for the White House East Wing Modernization and State Ballroom EA and determined that it will not result in impairment of park resources, or in unacceptable impacts as described in § 1.4.7.1 of Management Policies. Sections 1.4.5 and 1.4.6 of Management Policies further explain impairment.

Section 1.4.5 defines impairment as an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

An impact to any park resource or value may, but does not necessarily, constitute an impairment, but an impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, 1.4.5).

Section 1.4.6 of Management Policies identifies the park resources and values that are subject to the no-impairment standard. These include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;

- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

NPS non-impairment analysis normally does not include discussion of impacts to visitor access and experience, socioeconomics, public health and safety, environmental justice, land use, park operations, wilderness, etc., as these do not constitute impacts to park resources and values subject to the no-impairment standard under the Organic Act. See Management Policies § 1.4.6.

### **Non-Impairment Determination for the Selected Action**

As a basis for evaluating the potential for unacceptable impacts or impairment on the park's resources, the NPS relied on the EA which is incorporated by reference herein. The EA includes analysis of impacts to cultural resources, including cultural landscapes and historic buildings and visitor access and experience. The NPS analyzed a no action alternative and proposed action in detail in the EA.

The proposed action was selected for implementation, because the Executive Office of the President identified the selected action as the only alternative that meets its functional goals and operational needs. The proposed action is referred to as the selected action in this document. The selected action will establish a permanent, secure event space within the White House grounds. This will be accomplished by replacing the existing East Wing of the White House with a new building that will house the White House State Ballroom. The selected action will necessitate some modifications to the existing landscape.

Under the selected action, the existing East Wing and portions of the East Colonnade will be largely deconstructed. Prior to deconstruction, the NPS will remove all collections, artifacts, and paintings (collectively "museum objects") from the East Wing of the White House and some museum objects from the Executive Mansion. Museum objects will be either re-displayed or properly stored.

The new building will be approximately 90,000 square feet and will be connected to the Executive Mansion through the East Colonnade. The East Colonnade will be renovated to include a secure second story that will provide direct access from the East Room to the State Ballroom, while maintaining existing ground-floor access to and from the main Executive Mansion. The second floor of the new building will feature a State Ballroom, while the first floor will accommodate guest suites, executive offices, restrooms, and a visitor entrance with expanded interpretive areas.

### **Purpose and Fundamental Resources and Values of The White House and President's Park**

The purpose of the park and its fundamental resources and values are important context for a non-impairment determination. The purpose of the White House and President's Park is described in the enabling legislation. The enabling legislation states:

*Primary attention shall be given to the preservation and interpretation of the museum character of the principal corridor on the ground floor and the principal public rooms on the first floor of the White House, but nothing done under this Act shall conflict with the administration of the Executive offices of the President or with the use and occupancy of the buildings and grounds as the home of the President and his family and for his official purposes (Pub. L. No. 87-286, 75 Stat. 586 (1961)).*

The White House and the surrounding cultural landscapes are fundamental resources of the park as well as visitor experience and public access, First Amendment activities, museum collections, and the park's iconic views and vistas. The park is also significant for its historical importance and its enduring role as a symbol of democracy (NPS 2014). The EA discusses impacts to the White House building and cultural landscapes in detail and acknowledges the importance of views and vistas as part of the cultural landscape. The analysis below further addresses these resources in the context of the Organic Act.

Other park resources subject to the no-impairment standard may experience some effects; however, these effects are minimal and were determined not to warrant detailed analysis in the EA. Museum collections and objects, which are fundamental resources of the park, were not carried forward for detailed analysis. As described in the EA, museum objects will be properly stored to ensure their preservation for the future enjoyment of the American people. Also, resources such as noise, wildlife and wildlife habitat, archeology and air quality are not discussed further here, as the anticipated effects are so minor that they have no potential to result in unacceptable impacts or impairment. For a detailed description of park resources considered but dismissed from detailed analysis, see Appendix A of the EA.

As noted above, the NPS does not include a non-impairment analysis for visitor access and experience, as it is not identified in Section 1.4.6 of Management Policies as a resource subject to the no-impairment standard. However, as described in the Finding of No Significant Impact (FONSI) and in greater detail in the EA, the selected action does not permanently restrict visitor access to the White House. While some areas of the White House and grounds will be temporarily restricted or closed, White House tours and events are expected to occur in some capacity. Thus, this fundamental value will be maintained under the selected action.

In most cases, the evaluation of unacceptable impacts or impairment to the resources discussed in this document, specifically cultural landscapes and historic buildings, considers the extent to which the selected action changes characteristics from the period of significance, such as whether a building still reflects its appearance during an important historical event or period. In this case, however, the analysis must be guided not only by the preservation requirement in the Organic Act, but also by the park's unique enabling legislation and its primary purpose, which recognizes the White House as both a residence and a workplace. The Organic Act's preservation mandate is constrained by the purposes of the park to support the use and

occupancy of the buildings and grounds by the President and First Family, and to facilitate official Executive functions. As described in the FONSI, the selected action meets the needs identified by the Executive Office of the President. The non-impairment analysis below appropriately considers potential impacts not only through the lens of the Organic Act and NPS Management Policies, but also consistent with the park's enabling legislation.

#### Cultural Resources Non-Impairment Analysis

##### *Cultural Resources – Cultural Landscapes*

The White House and President's Park include three distinct cultural landscapes that were identified as contributing features to the L'Enfant Plan of the City of Washington, DC, a historic district listed in the National Register of Historic Places (NPS 1997). The White House Grounds Cultural Landscape, which was originally designed by Thomas Jefferson and later modified by the designs of Andrew Jackson Downing, Frederick Law Olmsted Jr., and others, will be altered through an expansion of the White House footprint and the addition of a larger structure on its east side. Similarly, views of the White House from Lafayette Park and the Ellipse will be permanently altered due to the modifications to the East Wing. In the short term, construction activities, including the presence of equipment and the removal and replanting of vegetation, will result in temporary adverse effects on these landscapes.

While the selected action introduces adverse impacts to the park's cultural landscapes, these impacts do not rise to the level of impairment, particularly in relation to the historic views and vistas central to the L'Enfant Plan of 1791. The long vista, connecting the White House, Washington Monument, and Jefferson Memorial, has been a defining feature of Washington D.C. for over two centuries. The White House, situated at a prominent high point, has undergone many modifications over time, including the construction of the East and West Wings. These changes, while altering the immediate setting, did not compromise the broader visual and spatial relationships that define the L'Enfant Plan. The selected action is consistent with these past changes in that it does not obstruct or diminish the visual connection between these landmarks. The integrity of the long vista, a defining element of the original city plan, remains unobstructed, and thus unimpaired, under the selected action.

Under the selected action, the White House Grounds Cultural Landscape will be affected by a reduction in architectural symmetry and alterations to the manicured environment and built features of the landscape. However, as noted in the EA, mitigation measures such as replanting historically significant trees, salvaging and reusing historic materials, and preserving or reinstalling garden features will help maintain continuity between the site's historic character and its contemporary functions. These measures ensure that significant elements of the landscape are preserved and adapted for continued use, eliminating the potential of impairment.

Most importantly, the historical significance of the park's cultural landscape reflects its continuous adaptation to meet the evolving needs of the Executive Office of the President. The selected action continues a long-standing tradition reflected in the park's enabling legislation of adapting the White House grounds to accommodate essential executive goals. The changes to



the cultural landscapes for this purpose are consistent with its historic character and thus do not rise to the level of impairment.

#### *Cultural Resources – Historic Buildings*

The White House was designated as a National Historic Landmark (NHL) in 1960. Under the selected action, the existing East Wing will be removed and replaced with a new building, resulting in the permanent loss of a component that has supported White House operations since 1942. The second story addition on the East Colonnade will further modify the traditional spatial organization and sightlines of the grounds. These changes will adversely alter the design, setting, and feeling of the White House and its grounds over the long term. Also, the selected action may introduce temporary risks to the historic building, including noise, vibration, and potential settlement effects, which could affect the structural stability or finishes of the Executive Mansion and adjacent features.

While the selected action will alter the design, setting, and feeling of the White House and its grounds, mitigation measures, including HABS, LiDAR, and photographic documentation and the salvage and storage of select historic building materials, will preserve important elements of the historic fabric. These materials are intended to be reused in the modernized East Wing or retained for future preservation or restoration efforts. Thus, despite the changes, these historic building materials will remain available for the appreciation and benefit of the American people.

Finally, the White House is unique in that, although it is a historic structure, it continues to evolve to meet the operational needs of the Executive Office of the President, a quality that contributes to its historical significance. Indeed, when the NHL was designated, the East Wing had existed in its current form for only 18 years. Under the selected action, the White House retains its designation as an NHL, along with its historical value and iconic status. The modernized East Wing and new State Ballroom will directly benefit the American people by expanding the White House's ability to host large indoor events, celebrate America's history through new interpretive opportunities, and create a symbolic space for events of national importance, reinforcing shared civic identity and pride. It will continue to serve both as a symbol of democracy and as a functioning seat of the executive branch. Therefore, the selected action does not result in unacceptable impacts or impairment, as the changes are consistent with the ongoing historical significance of the White House and its grounds.

#### Conclusion

As demonstrated here and supported by the analysis in the EA, the impacts from the modernization of the East Wing and the construction of a State Ballroom, do not prevent the National Park Service from fulfilling the park's purpose or result in impairment of park resources. Additionally, the selected action will not unreasonably interfere with park programs or activities, including tours and special events; with other appropriate uses; with the overall atmosphere of peace and tranquility; with the natural soundscape; or with NPS concessioner or contractor operations. Therefore, the selected action will not cause impairment of, or unacceptable impacts to, the park's resources or visitor experience.

## References

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