AMENDMENT
TO THE
PROGRAMMATIC AGREEMENT
AMONG
THE SMITHSONIAN INSTITUTION
THE NATIONAL CAPITAL PLANNING COMMISSION
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE REVITALIZATION OF THE HISTORIC CORE REVITALIZE CASTLE PROJECT
WHEREAS, the above-referenced Programmatic Agreement (PA) was executed on March 29, 2023; and
WHEREAS, the SI identified the need to divide the Project into two phases of Section 106 consultation. Phase 1 actions addressed in the PA are connected to below-grade construction work, including excavation below and adjacent to the Castle, and creation or enlargement of the areaways and window wells and were addressed in the PA. Phase 2 design actions are the remaining design actions for the main building and landscape rehabilitation (Exhibit H – Assessment of Effects Report Summary) that will be addressed in this Amendment to the PA (Amendment); and
WHEREAS, the Phase 2 project scope (Exhibit J – Assessment of Effects on Historic Resources, beginning on page 15) includes restoration of the Castle exterior; modifications to the roof including increases in height to accommodate energy improvements and replacement in-kind of materials; installation of rooftop mechanical penthouses; replacement of non-historic windows with blast resistant sash; restoration of historic windows and installation of blast resistant storm windows; installation of site and building lighting; and alterations at the north and south entrances for universal accessibility; and
WHEREAS, the SI and NCPC have agreed that SI will be the lead agency pursuant to 36 CFR § 800.2(a)(2) to fulfill their collective Section 106 responsibilities; and that certain interior actions that are associated with exterior changes or excavation and do not have independent utility are subject to Section 106 consultation to fulfill NCPC’s Section 106 obligations. Therefore, the following interior actions were included in Phase 2 consultation: basement level interior alterations associated with lowering the basement floor, new window openings and egress paths, installation of replacement windows and associated interior effects, and interior alterations to accommodate the South Tower elevators; and
WHEREAS, the Assessment of Effects on Historic Resources (Assessment) report has been revised several times in consultation. The report is organized around the two phases of consultation. This Amendment documents the revisions to the Assessment and additional mitigation or minimization measures that will be taken to resolve adverse effects from Phase 2 actions (Exhibit I – Phase 2 Design Details for Avoidance, Minimization, and Mitigation Measures, Exhibit J – Assessment of Effects on Historic Resources); and
WHEREAS, the Signatories agree that the complete scope of the Project, including work from both phases, will result in adverse effects on the Castle; and
WHEREAS, Section 106 consultation identified certain adverse effects that were within the scope of this consultation that became the primary focus of consultation. These actions included: creating areaways
around the base of the Castle; introduction of a new finish treatment applied to the Castle’s rubble stone foundation wall; the expansion and installation of new basement window openings; exterior appearance of the seismic control joint cover plate; exterior and interior alterations associated with the installation of two elevators in the South Tower; installation of two visible mechanical penthouses behind the Flag and North Towers; and the installation of perimeter security elements on Jefferson Drive; and

WHEREAS, the cumulative effect of changes around the Castle’s setting from perimeter security, accessibility, areaway and window well finishes, and the seismic control joint cover plate finishes adversely affect both the Castle and the National Mall Historic District; and

NOW, THEREFORE, in accordance with Stipulation 9 of the PA, the Signatories agree to amend the PA with the following additional stipulations to take into account the effects of this undertaking on historic properties.

STIPULATIONS

Stipulations 1 through 15 are contained in the PA.

The SI will ensure that the following measures are carried out:

16. ADDITIONAL AVOIDANCE MEASURES FOR PHASE 2

A. Use of In-Kind Replacement Materials: The following actions avoid adverse effects through maintaining the Castle’s exterior material palette (Exhibit I, page 15):

   i. Exterior Masonry Repairs to Historic Fabric: The maximum amount of sound Seneca sandstone will be preserved. The historic sandstone exterior will be restored, cleaned, and repointed. Required stone replacements and Dutchman repairs will be accomplished using a stockpile of salvaged Seneca sandstone currently in SI storage. St. Bees is an alternative sandstone identified in Phase 2 consultation as a suitable alternative to be used for repairs after the salvaged Seneca sandstone stockpile is depleted.

   ii. Roof Materials: Existing areas with lead coated copper roofing will be replaced with zinc-tin coated copper. Existing areas with slate shingles will be replaced with Grayson Slate, an even toned gray slate that closely matches the existing. Existing shingle sizes, details, and amount of exposure will be maintained.

B. South Entrance Accessible Walkway: A universally accessible walkway will replace a non-historic ramp on axis with the South Tower entrance. The adverse effect is avoided through retaining the historic sandstone steps and constructing the walkway over the steps flush with the historic stone landing. The walkway design maintains full visibility of the decorative door portal features. Adverse effects on the Castle setting and the Haupt Garden are avoided through the universal walkway slope which eliminates a code required handrail, and the use of salvaged brick pavers and Mount Airy granite curbs in keeping with the Garden’s material palette (Exhibit I, page 15).

C. Roof Modifications: Increases to roof height/thickness to accommodate insulation will be limited to locations where the dimensional change will not be perceptible. No changes will occur at visible roof
edges. Roof dimensional changes at flat metal areas will taper to the roof edges to keep the alteration non-visible (Exhibit I, page 16).

17. ADDITIONAL MINIMIZATION MEASURES FOR PHASE 2

The following measures were developed through Section 106 consultation to minimize adverse effects for Phase 2 actions.

A. Perimeter Security: A secure perimeter at the Castle’s three entrance and exit points on Jefferson Drive will be accomplished through a combination of hardened street furniture, including bollards, urns on pedestals, wall signage, and benches. Benches and wall signage conceal bollards in keeping with traditional street furniture types (Exhibit I, page 16).

i. Bollards: Both the free-standing fixed and retractable bollards will measure 30 inches in height and 7 inches in diameter for visual continuity between the two types. Bollards will be clad in bronze with bush hammered detailing to reference the Castle’s stonework.

ii. Double-sided Metal Bench: Two double-sided metal open slat benches will incorporate four bollards each, on either side of the porte cochere. The bench design is a contemporary take on existing wood slat and metal filigree benches currently found in the National Mall and Castle settings.

iii. Wall Bench: Two wall benches will incorporate nine bollards each adjacent to the accessible walkways. This bench type consists of open metal slats above a granite base. Stepping the granite base down from the ends permits maximum visibility of the Castle and the landscape setting.

iv. Granite Type: XXXXXX granite will be used for the wall bench base, wall signage, and urn pedestals. This gray-brown stone colorway was selected in Phase 2 consultation, contextual to both the Castle and the Jefferson Drive streetscape material palettes.

B. Modifications to Rooftop Mechanical Penthouses: To maintain the Castle’s roofline, historic non-functioning visible rooftop mechanical features will be retained, including, the metal mushroom vent on the West Range roof, and the decorative abandoned masonry chimneys on East Range and East Wing (Exhibit I, page 17).

i. North Entry Hyphen Mechanical Penthouses: Multiple alternatives were developed to minimize visibility of two mechanical penthouses behind the Flag and North Towers to the greatest extent possible. The preferred alternative is the narrowest width (3’10”) and shortest height (12’1”) possible and closest in placement to the Hyphen roof ridge to minimize visibility. The penthouses will be clad in copper and detailed with an arched louver treatment on their respective east and west sides in keeping with the Castle’s other rooftop appurtenances.

C. South Tower Elevators: Two elevators are proposed in the South Tower for the primary public circulation to all levels of the Castle’s interior. The proposed west elevator shaft replaces a non-historic elevator shaft, and the east elevator replaces a non-historic circulation stair. Alternate locations for these public elevators are not available to avoid adverse effects because the Adolf Cluss modifications
inserted additional levels creating quarter level height differences between the finish floors of the South Tower and the Main Building (Exhibit I, pages 17 and 18).

i. Exterior Alterations: The elevators will use machine room-less technology, which eliminates overhead mechanical equipment above the elevator shaft to minimize the required size of the elevator overruns. Elevator overruns will be the minimum length (11’1”) and shortest height (3’7” above the parapet) possible. Elevator overruns will have a hipped profile, arched detailing, and copper cladding in keeping with other Castle roof appurtenances.

ii. Children’s Room Alterations: Two new punched openings are proposed within blind arches to access the elevator cab vestibules, which will remove historic fabric. The design originally proposed two openings at the Children’s Room to access each elevator vestibule. This was revised in consultation to one opening. The proposed openings will be arched to relate to the form of the blind arches. The historic circulation corridor between the Children’s Room and the Great Hall will narrow 1’6” to accommodate the shafts, which removes historic plaster. The proposed elevators permit the restoration of most of the Children’s Room floor plan, currently half occupied by non-historic stairs, accessible lift, and platform. Historic Tennessee Pink marble stairs which are present beneath the non-historic accessible lift platform, will be exposed and restored.

iii. Third Floor Interior Alterations: The historic circulation corridor between the Regents Room at the Upper Great Hall must narrow 1’5” to accommodate the elevator shafts, which impacts historic plaster and two sections of decorative floor mosaics. The mosaics will be narrowed through excising the center solid color tesserae and portions of the fretwork border. Mosaics will be re-laid with the fretwork border pattern intact aside from the dimensional change.

iv. Elevator Cabs: The exterior of the elevator cabs in all historic interiors will be bronze, simply detailed, and utilize minimal frames to avoid calling undue attention to the installations.

D. Areaways and Window Wells – Finishes: The proposed finishes within the areaways will consist of gray porcelain pavers and tinted stucco on both the Castle underpinning and the new areaway retaining walls (Exhibit I, page 19). SI will consult with the Signatories on physical mock-ups during construction to select the stucco color and texture as follows:

i. SI will convene the Signatories for a site meeting to review small samples of a range of gray and red tints. The Signatories will select stucco color options to proceed for full-scale mock-ups.

ii. SI will convene the Signatories for a second site meeting to review full-scale wall section mock-ups of the stucco tint and finish treatment (mock-ups approximately 4’ by 8’). The Signatories will select the final stucco color(s) and texture(s).

E. Seismic Control Joint Cover Plate – Finishes: Two materials are proposed to fill the seismic control joint cover plate to be contextual to different settings around the Castle. Olympic Black granite will be used where the cover plate is adjacent to the Castle and landscaping. Exposed aggregate concrete will be used where the cover plate is within the Jefferson Drive sidewalk. The narrow aluminum edges of the cover plate will have a clear anodized finish for neutrality in the Castle and National Mall settings (Exhibit I, page 19).
F. Replacement and Restoration of Windows: The majority of the Castle’s existing windows are non-historic wooden replacements installed in 1987-1992. Historic documentation indicates the original window fenestration was primarily wood double-hung sash with wood muntins of square panes set in a diamond pattern (Exhibit I, page 20).

i. Replacement Windows: Blast resistant windows will replace all the non-historic window sash. Blast resistant windows will be steel sash with simulated divided lights. The replacement windows will be modeled on the remaining historic windows using a matching brickmold, similar muntin pattern, diamond pane configuration, and red-brown finish. Window configurations that feature decorative metal panels and woodwork will be salvaged, restored, and applied to the blast window assembly.

ii. Restored Windows: All the remaining historic windows in the Castle, which are limited to the West Wing, West Range, and North Tower will be restored and retained in-place. Blast resistant storm windows will be installed on the building interior to maintain the Castle’s exterior appearance.

iii. Consultation on Window Mock-ups: SI will convene the Signatories for a site meeting(s) to review full-scale mock-ups of the replacement windows. The mock-ups will consist of, at a minimum, a blast resistant window sash and a blast resistant storm window. Section 106 consultation will be re-opened if the mock-up review(s) reveals an intensification of adverse effects.

a. Historic Masonry Openings: SI will evaluate with the window manufacturer during the preparation of mock-ups on the potential for damage to the dimensions of the historic masonry openings and adjacent soft sandstone material during installation of the steel windows. If there is potential for unanticipated damage to the historic stone, SI will notify the Signatories and consult to ensure damage is minimized or to otherwise resolve this intensification of adverse effect.

iv. Shop Drawings: SI will provide the Signatories with the shop drawings for the manufacture of replacement windows and interior storm windows. Signatories will have thirty calendar days to review and comment on the shop drawings prior to SI proceeding with window manufacturing or installation activities.

G. Basement Level Openings: Alterations to window openings and egress doors are proposed within visible areaways to provide daylight and required emergency egress (Exhibit I, pages 20 and 21).

i. Egress Doors: The historic door opening installed c. 1871 at the southeast portion of the Main Building will be maintained. The egress door infill will feature a four-light transom.

ii. Window Openings: Alterations to existing window openings will maintain the width and header location. New openings will match the altered window openings, with dimensions of 3’4” in width and 7’ in height. Historic sandstone units need to be altered to accommodate the window openings. Sandstone units will be removed, cut and dressed, and reinstalled in their original locations.
a. Window sash will be fixed, double-hung, steel, simulated divided light blast resistant windows. The upper sash will feature a diamond muntin pattern over a single light lower sash. This window configuration is in keeping with the Castle’s historic window configuration, with slight variation to differentiate the sash as a new installation.

b. Basement level window openings will have applied iron security grilles matching the dimensions and details of existing grilles.

H. Basement Level Interior Alterations: Certain exterior alterations affect the Castle’s basement level interior and its historic character.

i. Basement Level Window Openings: New and altered basement level window openings will have an embrasure similar to the historic window condition.

ii. Lowering of the Basement Floor: Lowering of the historic basement floor 3’ feet alters the appearance of the interior space including the historic masonry piers. New construction below the brick piers will have a gray parge coat as a utilitarian treatment in keeping with the historic character of the space, and which differentiates the material from the retained historic brick masonry. If unanticipated historic fabric is discovered during excavation, these features will be considered for recordation, potential salvage, and/or possible preservation in place of select features in accordance with this PA.

iii. Basement Level Interior Finishes: Interior basement finishes will be in keeping with the historic utilitarian character of this space. Historic brick will remain exposed, with a white painted finish matching the historic condition (Exhibit I, page 21).

18. ADDITIONAL MITIGATION MEASURES

A. Educational Outreach: The SI will expand publications on the history of the Castle and topics related to construction to build educational outreach in the following ways:

i. Web-Based Exhibits: The SI will publish web-based exhibits on the following topics within three years of the completion of construction on the project. Exhibits will be posted on the SI’s Architectural History and Historic Preservation webpage or otherwise be made available to the public.

a. Base Isolation: This method of seismic protection is unusual for the nation’s east coast. This publication will feature construction specifics for the installation of base isolation and the exterior seismic control joint. This exhibit will focus on how this approach was used to protect a National Historic Landmark and how care was taken to limit the intrusion of this intervention.

b. Landscape Planting Plan and South Yard History: This exhibit will feature the history of change to the Castle’s South Yard, including the evolving functions and uses of this landscape. The exhibit will detail the development of the project landscape planting plan.
c. National Historic Landmark Documentation Update for the Castle: This exhibit will consist of an executive summary of the completed update to the Castle’s National Historic Landmark documentation that will be developed in accordance with Stipulation 3.C of the PA.

d. Art Room Restoration: The Art Room is located on the second floor of the Castle’s East Wing. This historic space features a decorative plaster frieze fabricated as copies of the Elgin Marbles. This space will be fully restored but will not be open to the public after construction on the project is complete. This exhibit will feature the Art Room’s history, restoration work, and remote accessibility to the space using a virtual tour, panoramic images, or other media. SI will open the space periodically for supervised tours. Tour opportunities will be advertised through the Preservation Periodical or the Architectural History and Historic Preservation webpage.

e. Castle’s Architectural Style and James Renwick, Jr.: This exhibit will feature Robert Dale Owen’s Hints on Public Architecture publication which led to the selection of the Castle’s architectural style and its architect James Renwick, Jr.

ii. Preservation Periodical: The SI’s Architectural History and Historic Preservation unit publishes a biannual newsletter to connect with individuals that have an interest in providing input on current and future SI projects with potential to affect historic properties; learning more about historic properties under the SI’s jurisdiction; and engaging in a dialogue on related topics. Each future issue of the newsletter will incorporate a Castle construction progress update during the complete duration of the project, with highlights on any new discoveries regarding the building’s history, and historic function and construction.

iii. Addendum Chapter to The Castle an Illustrated History of the Smithsonian Building: The SI will publish an addendum chapter to the book publication titled The Castle. The existing book details the architectural and cultural history of the Castle. The addendum chapter will detail the project design and completed work, published in a new printing of the book within four years of the completion of construction.

B. Video Walkthroughs: The SI will gather data from a Lidar and high-definition panoramic imaging scanner to create a three-dimensional model of the Castle interior. This record documentation will be utilized to create a virtual experience of walking through the Castle’s principal interior spaces. Data points will be taken from the same locations to experience the pre-construction condition, after demolition, and after construction/restoration work is complete. The virtual walkthroughs will be completed within two years of the completion of construction on the project and will be posted on the SI’s Architectural History and Historic Preservation webpage or otherwise be made available to the public.

C. Section 106 Project Archive: The RoHC Section 106 public webpage will be archived to create a complete record of consultation on the project. The webpage will be archived by the Smithsonian Institution Archives and will become part of the Smithsonian Institution Websites collection. The archived Section 106 project webpage will be accessible through the Architectural History and Historic Preservation webpage or otherwise be made available to the public.
D. Castle Foundation: The following measures mitigate significant adverse effects associated with creating areaways around the Castle’s base, the expansion and installation of new basement openings, and the introduction of new finish treatment applied to the Castle’s rubble stone foundation walls:

i. Rubble Stone Exhibit: After demolition is complete and the full extent of the rubble stone foundation wall is determined, the SI will convene the Signatories for a site meeting(s) to evaluate conditions and a location for a rubble stone exhibit. This exhibit is intended to leave a portion of the rubble stone exposed in a publicly accessible or visible areaway. The exhibit will feature one interpretive educational signage panel. The rubble stone can only be left exposed if conditions permit, which will be evaluated with the Signatories.

ii. Rubble Stone Conservation Treatment Plan: Waterproofing and a tinted stucco will be applied to the rubble stone foundation wall. Once the full extent and condition of the rubble foundation is known, the SI will develop a conservation treatment plan to identify materials and methods for reversibility of applied finishes to the rubble stone. Signatories will have thirty calendar days to review and comment on the conservation treatment plan prior to SI proceeding with construction activities.

E. Downing Urn: The Downing Urn is a marble memorial object dedicated to early American landscape architect Alexander Jackson Downing, originally installed within the National Mall in 1856. The Urn has been relocated several times and has been within the Castle’s vicinity since the 1970s, and within the northeast quadrant of the Haupt Garden since 1989. The Urn has been temporarily disassembled and is in SI secure storage to protect the object during construction activities and will be returned to its pre-existing location. Conservation treatments to the Urn will be completed, including addressing marble deterioration and reversal of improper previous repair attempts.

F. Mosaics Documentation and Salvage: Prior to undertaking any construction associated with the South Tower elevators, the decorative floor mosaics will be fully documented using tracing and photography. Unused tesserae will be salvaged, crated, and retained for future repairs.

G. Interior Exhibits:

i. Room Identification Placards: Wall-mounted room identification placards will be installed in each of the Castle’s interior public spaces. The placards will provide historic information on the room’s original use(s) or other facts. Placards will be sized and mounted specific to each interior to avoid damage to restored or replicated historic finishes.

ii. Interpretive Exhibit: SI will designate one area within a public space of the Castle interior for a permanent exhibit on the Castle’s history. The exhibit will consist of a physical display(s) on topics similar to those outlined in Stipulation 18.A.

H. Seismic Control Joint Interpretive Signage Location: One (1) interpretive signage panel will be installed adjacent to the apse of the Castle’s West Wing in the landscape near the Jefferson Drive sidewalk (Exhibit I, page 21).

I. Collaboration with Smithsonian Center for Folklife and Cultural Heritage: The Center’s project on the Building Arts and Traditional Architecture is focused on cultural sustainability and commitment to the building arts to sustain traditional building crafts and support new applications of traditional
architecture around the world. The Castle project will require highly skilled traditional artisans to restore the Castle’s masonry, terrazzo, decorative plaster, and paint finishes. The SI’s Office of Planning, Design, and Construction will seek to collaborate with the Center as opportunities present themselves to feature the Castle project and its artisans.

19. CONTINUING INVOLVEMENT OF CONSULTING PARTIES

All decisions made by the Signatories pursuant to the Amendment will be provided for Consulting Parties review and comment. SI will post documentation on each decision to the Architectural History and Historic Preservation webpage, with an email notification to Consulting Parties. Consulting Parties will have 30 calendar days to review the decision and provide comments prior to SI proceeding with implementation. The Signatories will consult to resolve any comments raised by Consulting Parties in accordance with Stipulation 12 (Dispute Resolution). Section 106 consultation may be re-opened if any decision results in the intensification of adverse effects.

20. ELECTRONIC COPIES

Within one week of the last signature on this Amendment, the SI will provide the Signatories with one legible, color, electronic copy of the fully executed Amendment and all attachments fully integrated into one, single document. Internet links will not be used to provide copies of attachments. If the electronic copy is too large to send by e-mail, the SI will provide the Signatories with a copy of this Amendment on a compact disc or other suitable means.

The Signatories agree that all other terms and conditions of the PA shall remain unchanged.

SIGNATURES FOLLOW ON SEPARATE PAGES

EXHIBITS

Exhibits A through G are contained in the PA

Exhibit H – Final Assessment of Effects Report Summary
Exhibit I – Phase 2 Design Details for Avoidance, Minimization, and Mitigation Measures
Exhibit J – Assessment of Effects on Historic Resources
SIGNATURE PAGE
AMENDMENT
TO THE
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REGARDING
THE REVITALIZATION OF THE HISTORIC CORE REVITALIZE CASTLE PROJECT

THE SMITHSONIAN INSTITUTION

Ronald S. Cortez, JD, MA                                                Date
Under Secretary for Administration
SIGNATURE PAGE
AMENDMENT
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DC STATE HISTORIC PRESERVATION OFFICER

_____________________________  
David Maloney  
DC State Historic Preservation Officer  

Date
SIGNATURE PAGE

AMENDMENT

TO THE

PROGRAMMATIC AGREEMENT

REGARDING

THE REVITALIZATION OF THE HISTORIC CORE REVITALIZE CASTLE PROJECT

THE NATIONAL CAPITAL PLANNING COMMISSION

Marcel C. Acosta        Date
Executive Director
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AMENDMENT
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THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

Reid Nelson          Date
Executive Director
### Exhibit H – Final Assessment of Effects Report Summary

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Exhibit I – Phase 2 Design Details for Avoidance, Minimization, and Mitigation Measures


Stipulation 16.B. South Entrance Accessible Walkway.
Stipulation 16.C. Roof Modifications. Green outline notes areas with visible roof edges. Dimensional changes are not proposed in these locations to avoid adverse effect.


Rendering of perimeter security at the west accessible walkway using a gray-brown granite.
Stipulation 17.B. Modifications to Rooftop Mechanical Penthouses. Historic chimneys and dormers that will be retained are noted in yellow.

Section elevation of the Castle’s North Tower and Hyphen. Rendered view of the visibility of the same penthouse from Jefferson Drive.

Stipulation 17.C. South Tower Elevators. Axonometric view of the Castle’s South Tower with the elevator overruns noted with green copper cladding. Section elevation noting the dimensions of the east elevator overrun.
Proposed north elevation of the Children’s Room interior. New arched openings are proposed centered within the historic blind arches for access to the South Tower elevators.

Rendered view from the Great Hall looking into the Children’s Room. New bronze elevator doors flank the historic center arched opening.

Proposed modification to the upper section of the third-floor decorative mosaic from narrowing the corridor to accommodate the elevator shafts.
Stipulation 17.D. Areaways and Window Wells – Finishes. Proposed southwest areaway with gray tinted stucco applied at the retaining walls and the Castle foundation wall.

Proposed southwest areaway with red tinted stucco applied at the retaining walls and the Castle foundation wall.

Stipulation 17.E. Seismic Control Joint Cover Plate – Finishes. Annotated photograph of the Castle porte cochere and Jefferson Drive sidewalk. Red line notes the outboard edge of the seismic control joint cover plate; aggregate concrete will be used in this location. In other areas Olympic Black granite will infill the cover plate.
Stipulation 17.F. Replacement and Restoration of Windows. Proposed Castle north elevation with window replacement types noted.

Free glass comparison of a typical diamond pattern muntin; existing at left, simulated divided light at right.

Stipulation 17.G. Basement Level Openings. Proposed south elevation noting masonry changes at the basement level for new window openings.
Detail elevation at the southeast basement level with the c. 1871 historic door opening and proposed egress infill.


Stipulation 18.H. Seismic Control Joint Interpretive Signage Location.
Exhibit J – Assessment of Effects on Historic Resources

Note: Not included during draft review to keep the amendment document length manageable.