

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICE



December 15, 2015

Ms. Joan Brierton, Senior Preservation Specialist  
U.S. General Services Administration  
Public Buildings Service  
Office of the Chief Architect  
1800 F Street, NW, Suite 5400  
Washington, DC 20405

RE: GSA Transmittal of NCPC-Proposed Amendment to the 1974 Pennsylvania Avenue Plan for Squares 378 and 379 (current FBI Headquarters Site) to Congressional Committees and Amendment of 1974 Plan

Dear Ms. Brierton:

Thank you for contacting the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking. This letter provides our initial comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

As noted in your letter, we have been participating in consultation along with representatives from GSA, other Federal and District agencies, and the various consulting parties for several months now regarding the FBI Building Consolidation and Exchange Project, of which the proposed amendment to the 1974 Pennsylvania Avenue Plan (Plan) is one of the first and most significant steps.

NCPC proposed the amendment in accordance with the non-Section 106 agreement among GSA, NCPC and NPS which defined how the Plan would be implemented after the former Pennsylvania Avenue Development Corporation (PADC) was dissolved. NCPC also took the lead in drafting and refining the amendment and we understand that the final document was prepared after considering and incorporating, to the extent possible, the comments which were received from the review agencies and various consulting parties identified in your letter.

Although NCPC's proposal does not constitute an "undertaking," we agree that GSA's transmittal of the amendment to Congress and the subsequent amendment of the Plan do meet the definition of "undertaking" specified at 36 CFR 800.16(y) because the amendment will directly affect future development of the FBI site, regardless of whether that development is public or private in nature.

Pursuant to 36 CFR 800.5(b), we also concur with GSA's determination that the undertaking will have "no adverse effect" on historic properties provided that certain conditions are met, namely the development of more specific square guidelines and a Programmatic Agreement (PA) that will require and outline a more thorough evaluation of effects on historic properties and the approaches that will be used to resolve those effects.

If you should have any questions or comments, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, we look forward to continuing consultation with all parties on this important undertaking. Thank you for providing this opportunity to comment.

Sincerely,

C. Andrew Lewis  
Senior Historic Preservation Specialist  
DC State Historic Preservation Office