

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICE



March 6, 2014

Ms. Nancy Witherell  
Regional Historic Preservation Officer  
Office of Planning & Design Quality  
U.S. General Services Administration  
301 7th Street, SW, Room 4004  
Washington, DC 20407

RE: SHPO Comments on the Federal Bureau of Investigation Determination of Eligibility Form

Dear Ms. Witherell:

Thank you for providing the DC State Historic Preservation Office (SHPO) with a Determination of Eligibility (DOE) Form for the J. Edgar Hoover Federal Bureau of Investigation Building (FBI Building) located at 935 Pennsylvania Avenue, NW. We very much appreciate the thoroughness of the research and analysis that clearly went into preparing the very extensive DOE Form and its supporting illustrations. We also appreciate that GSA arranged a site visit for us to inspect the property on January 17, 2014. Based upon our review of the DOE and the results of the site visit, we are hereby submitting our comments regarding the National Register of Historic Places eligibility of the FBI Building in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Although the FBI Building is the first purpose-built headquarters for the FBI, the DOE recommends that the property is not eligible for listing in the National Register of Historic Places. To summarize in the broadest, most general terms, the DOE recommends that the FBI Building is:

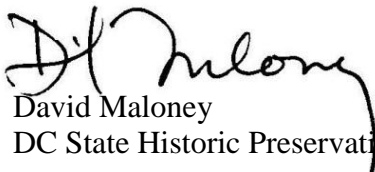
- Not eligible under Criterion A because the relative majority of significant events associated with the FBI occurred prior to construction of the FBI Building;
- Not eligible under Criterion B based upon association with J. Edgar Hoover because the building was not completed until after his death;
- Not eligible under Criterion C because the building is “not distinctive” as an example of Brutalism or a notable example of the work of C.F. Murphy and Stanislaw Z. Gladych, Architects;
- Not eligible under Criterion D due to being unlikely to yield archaeological information associated with history or prehistory; and
- Not eligible under Criterion Consideration G because there is no basis to establish that the thirty-nine year old building is of “exceptional importance.”

In addition to supporting the findings listed above, the DOE analyzes other relevant points that are critical factors in evaluating the potential significance of the FBI Building including its contribution to the redevelopment of Pennsylvania Avenue; its relationship to the goals of the Pennsylvania Avenue Advisory Committee (PAAC); alterations that have affected the integrity of the property; the building's very extended design review process; critical reception; comparable examples of Brutalism; and other pertinent topics. In each of these instances, the conclusions bolster the claim that the FBI Building does not meet National Register Criteria. Also of note, the DOE clarifies that the FBI Building does not fall within the Pennsylvania Avenue National Historic Site's Period of Significance (1791-1962) and, therefore, is not a contributing element of the surrounding historic district.

After careful consideration of the information provided and first-hand inspection of the existing building conditions, we concur with GSA's determination that the J. Edgar Hoover Federal Bureau of Investigation Building is not eligible for listing in the National Register of Historic Places. As a result, no further consultation with our office regarding the eligibility of the FBI Building will be necessary.

If you should have any questions or comments, please contact me at [david.maloney@dc.gov](mailto:david.maloney@dc.gov) or 202-442-8850 or Andrew Lewis at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, thank you for providing this opportunity to comment.

Sincerely,

  
David Maloney  
DC State Historic Preservation Officer

13-674