



October 14, 2022

Mr. Reid Nelson
Acting Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001

VIA ELECTRONIC MAIL

Dear Mr. Nelson:

In accordance with the requirements of 36 CFR 800.14(c), the U.S. General Services Administration (GSA) is requesting Advisory Council on Historic Preservation (ACHP) review of its *Section 106 Exemption for Routine Operations and Maintenance* per the provisions set forth in 36 CFR 800.14(c)(5). This letter and its attachment serve as GSA's formal proposal and request for review.

GSA has worked in partnership with the ACHP developing this exemption, in particular, Laura Lavernia, GSA's Liaison to the ACHP, and in public consultation in accordance with 36 CFR 800.14(c)(3). The proposed exemption is for routine operations and maintenance activities conducted in buildings under the custody and control of GSA. The ACHP has determined that routine operations and maintenance activities constitute undertakings per 36 CFR 800.16(y) as these have the potential to affect the built environment. As detailed in the attached, the activities proposed for exemption have the potential for minimal or no adverse effect and all work undertaken will be managed by GSA's Regional Historic Preservation Officers, all of whom exceed the *Secretary of the Interior's Professional Qualifications Standards*.

As we understand, ACHP's Office of Native American Affairs (ONAA) has determined that our proposed exemption requires compliance with Executive Order 13175: *Consultation with Indian Tribal Governments*. For proposed exemptions, the Section 106 implementing regulations outline that the ACHP must conduct government-to-government consultation with Tribes. To this effect, GSA looks forward to participating in the ACHP virtual Tribal consultation meeting scheduled for Monday, November 7, 2022. GSA is proposing that the thirty (30) day timeframe allotted the ACHP for review of the exemption be extended to ninety (90) days to allow the ACHP to conduct Tribal consultation and for GSA to conclude consultation with all interested parties.

GSA appreciates the ACHP's partnership in this effort. We look forward to its successful conclusion and a formal vote by the ACHP in the new year.

Sincerely,

Beth L. Savage
Federal Preservation Officer
U.S. General Services Administration

cc: Christopher Koepfel, Assistant Director, Federal Property Management Section, ACHP
Javier Marques, General Counsel, ACHP

U.S. General Services Administration
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