

# Advisory Council On Historic Preservation

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The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

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OCT - 9 1996

Ms. Caroline Alderson  
Acting Regional Historic Preservation Officer  
National Capital Region  
General Services Administration  
Washington DC 20407

REF: Modernization of the Department of the Interior Headquarters Building  
Washington, District of Columbia

Dear Ms. Alderson:

The enclosed Memorandum of Agreement for the referenced project has been accepted by the Council. This acceptance completes the requirements of Section 106 of the National Historic Preservation Act and the Council's regulations. We recommend that you provide a copy of the fully-executed Agreement to the District of Columbia State Historic Preservation Officer.

Should you have any questions, please contact me at (202) 606-8528.

Sincerely,



Ralston Cox  
Historic Preservation Analyst  
Office of Planning and Review

Enclosure



General Services Administration  
National Capital Region  
Washington, DC 20407

**MEMORANDUM OF AGREEMENT  
BETWEEN THE GENERAL SERVICES ADMINISTRATION  
AND THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER  
SUBMITTED TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION  
PURSUANT TO 36 CFR 800.5  
REGARDING MODERNIZATION OF THE DEPARTMENT OF THE INTERIOR  
HEADQUARTERS BUILDING**

WHEREAS the U.S. General Services Administration, National Capital Region (GSA) has determined that the modernization of the Department of the Interior Building at 17th and C Streets, N.W., Washington, DC, may effect the qualities which qualify this building for the National Register of Historic places; and

WHEREAS GSA has consulted with the State Historic Preservation Officer (SHPO) and notified the Advisory Council on Historic Preservation (Council) in accordance with Section 106 of the National Historic Preservation Act 16, U.S.C. 470 (NHPA), and the implementing regulations (36 CFR 800);

NOW, THEREFORE, GSA and the SHPO agree that, upon acceptance of this MOA by the Council, the undertaking shall be implemented in accordance with the following stipulations to take into account the effects of this project on historic properties.

**STIPULATIONS**

**GSA shall ensure that the following stipulations are implemented:**

**I. Effects on the Department of the Interior Headquarters Building**

**A. Secretary of the Interior's Standards for Rehabilitation**

1. Rehabilitation of the Department of the Interior Headquarters Building will be undertaken in accordance with the Secretary of the Interior's Standards for Rehabilitation, as more specifically described in the Section 106 Project Description (100% Submittal; May 23, 1996), and with the exceptions noted below.
2. Rehabilitation will be undertaken in accordance with the Historic Structure Report dated 1988, with the exceptions noted in the Section 106 Project Description.
3. GSA will provide SHPO with a copy of the Historic Structure Report by December 31, 1996.



## B. Stair Towers

1. In accordance with the Secretary of Interior's Standards for Rehabilitation, GSA will install the two stair towers in a location and manner that minimizes adverse visibility from public space.

## C. Ramps

1. This memorandum of agreement addresses exterior accessibility ramps proposed for the north entrance and the east elevation at eighteenth street, as shown in the revised concept drawings submitted to the State Historic Preservation Officer on August 13, 1996.

## II. Further Design Review and Consultation:

- A. GSA shall submit concept sketches, revisions, and final plans to the SHPO for review and comment on the unresolved design issues described in Stipulations I.B and I.C, including an explanation of how the Stipulations are being implemented. GSA shall afford the SHPO thirty (30) days to complete this review and comment. GSA shall consult with the SHPO as needed, during or after the 30 day comment period, to resolve any adverse comment and respond to questions.

## III. Administration

- A. For purposes of this MOA the term "parties to this MOA" means GSA and the SHPO, and the Council upon its acceptance of this MOA.
- B. Should any party to this MOA object to any action carried out or proposed by GSA with respect to the implementation of this MOA, GSA shall consult with the objecting party to resolve the objection.
  1. If after initiating such consultation GSA determines that the objection cannot be resolved through consultation, GSA shall forward all documentation relevant to the objection to the Council, including GSA's proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the Council shall exercise one of the following options:
    - a. Advise GSA that the Council concurs in GSA's proposed final decision, whereupon GSA will respond to the objection accordingly;
    - b. Provide GSA with recommendations, which GSA shall take into account in reaching a final decision regarding its response to the objection; or
    - c. Notify GSA that the objection will be referred for comment pursuant to 36 CFR 800.6(b), and proceed to refer the objection and comment. The resulting comment shall be taken into account by GSA in accordance with 36 CFR 800.6(c)(2) and 110(1) of NHPA.

2. Should the Council not exercise one of the above options within 30 days after receipt of all pertinent documentation, GSA may assume the Council's concurrence in its proposed response to the objection.
  3. GSA shall take into account any Council recommendation or comment provide in accordance with this stipulation with reference only to the subject of this objection; GSA's responsibility to carry out all actions under this MOA that are not the subjects of the objection shall remain unchanged.
- C. At any time during implementation of the measure stipulated in this MOA, should an objection pertaining to this MOA be raised by the National Capital Planning Commission, Commission of Fine Arts, or a member of the public, GSA shall notify the parties to this MOA and take the objection into account, consulting with the objector and, should the objector so request, with any of the parties to this MOA to resolve the objection.
- D. At the request of any party to this MOA, a meeting or meetings shall be held to facilitate review and comment, to resolve questions, or to resolve adverse comments.
- E. GSA shall not alter any plan or other document that has been reviewed and commented on pursuant to this MOA, except to finalize documents commented on in draft, without first affording the SHPO an opportunity to review the proposed change and determine whether it will require that this MOA be amended. If GSA or the SHPO determines that an amendment is needed, the parties to this MOA shall consult in accordance with 36 CFR Part 800.5(e) to consider such an amendment.
- F. If GSA determines that it cannot implement the terms of this MOA, or if the SHPO or Council determines that the MOA is not being properly implemented, GSA, the SHPO, or the Council may propose to the other parties to this MOA that it be terminated.
1. The party proposing to terminate this MOA shall so notify all parties to this MOA explaining the reasons for termination and affording the parties to this MOA at least thirty (30) days to consult and seek alternatives to termination.
  2. Should such consultation fail and this MOA be terminated, GSA shall either:
    - a. Consult in accordance with 36 CFR 800.5(e) to develop a new MOA; or
    - b. Request the comments of the Council pursuant to 36 CFR 800.5(e)

Execution of this MOA by GSA and the SHPO, its subsequent acceptance by the Council, and implementation of its terms, evidence that GSA has afforded the Council an opportunity to comment on GSA's modernization of the Department of the Interior Headquarters Building, and that GSA has taken into account the effects of this modernization on the historically and architecturally significant qualities of the complex.

FOR THE GENERAL SERVICES ADMINISTRATION

By: J. M. Sherman  
Thomas M. Sherman  
Regional Administrator

8/27/96  
Date

FOR THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION  
OFFICER

By: Hampton Cross  
Hampton Cross  
State Historic Preservation Officer for the District of Columbia

9/27/96  
Date

ACCEPTED FOR THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Soule  
for Robert D. Bush  
Executive Director

10/2/96  
Date