



December 5, 2025

VIA ACHP E106 SYSTEM

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

Attention: Jaime Loichinger

Re: Termination of Existing Programmatic Agreement and Disposal of the Old Post Office,  
1100 Pennsylvania Avenue, Washington, D.C.

Dear Mr. Nelson,

The U.S. General Services Administration (GSA) is writing in regard to the Old Post Office and Annex (OPO or Property) located at 1100 Pennsylvania Avenue, NW, Washington, D.C. As you are aware, there has been a Programmatic Agreement (PA) in effect since 2013 (amended in 2023) among GSA, the District of Columbia Historic Preservation Office, the Advisory Council on Historic Preservation (ACHP), the National Capital Planning Commission, the National Park Service, and CGI Merchant Group, LLC since succeeded by MSD RCOF PARTNERS XL, LLC, a Delaware limited liability company as the Tenant to the Ground Lease, and its successor and assigns, regarding the ground leasing, rehabilitation, ongoing maintenance, and stewardship of the OPO, and associated transportation improvements. As part of ongoing efforts to reduce the federal government's footprint the OPO will be conveyed out of federal ownership.

GSA has determined that the disposition of the OPO is an undertaking pursuant to 36 CFR §800.16(y) of the implementing regulations for the National Historic Preservation Act and has the potential to affect historic properties. The Property is a contributing element of the National Register listed Pennsylvania Avenue National Historic Site and listed individually in the District of Columbia Inventory of Historic Sites. The area of potential effect (APE) for this Undertaking is the boundary of the Pennsylvania Avenue National Historic Site.

The proposed undertaking consists of conveying the entire fee interest in the Property to the Tenant of the Ground Lease, as well as assigning the responsibility and care of the artwork entitled *48 Shadow Planes* by Robert Irwin and the Benjamin Franklin Statue to MSD RCOF PARTNERS XL, LLC, as the new proposed owner of the site. GSA intends to retain ownership

1800 F Street, NW  
Washington, DC 20405-0002

of both the artwork and statue, and will manage the care through a separate covenant for fine arts to be recorded with the fee simple interest.

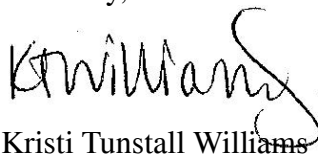
To avoid adverse effects, GSA proposes to convey the OPO with a preservation covenant that will provide adequate and legally enforceable conditions and restrictions on the Property in accordance with 36 CFR §800.5(b). Preliminary conversations with the DC SHPO indicate that they are willing and able to hold and enforce a covenant on the OPO.

GSA has determined that the fundamental nature of the undertaking associated with the PA is changing from a ground lease to property disposition. After careful consideration and review of the terms of the PA, GSA, in consultation with its counsel and your office, has determined that the PA cannot be amended to fit the new undertaking nor could an amendment shorten the duration of the existing PA. As such, GSA is terminating the PA in accordance with Stipulation XI.A. Pursuant to 36 CFR §800.6(a)(1) and Stipulation XI.B, GSA is notifying your office of the termination of the PA and consultation for the proposed disposal.

GSA's priority is to ensure the OPO remains protected throughout the conveyance process. As such, GSA proposes that the termination of the PA will take effect at the time the deed for the Property is conveyed from GSA to the purchaser, and the new historic preservation covenant takes effect.

GSA has notified the DC SHPO and the consulting parties of the termination and consultation for the disposal, and has invited them to participate via a separate letter. GSA is sending a Doodle Poll link via email with potential dates for a Consulting Parties Meeting in early January to discuss the proposed disposal, draft covenant, and proposed termination of the PA. Pursuant to GSA looks forward to receiving your comments and continuing consultation. If you have any questions, please contact Natalie Loukianoff at [natalie.loukianoff@gsa.gov](mailto:natalie.loukianoff@gsa.gov) or 628-224-5682.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristi Williams", with a stylized flourish at the end.

Kristi Tunstall Williams  
Federal Preservation Officer  
U.S. General Services Administration

Consulting Parties:

Marcel Acosta, Executive Director, National Capital Planning Commission,  
[marcel.acosta@npc.gov](mailto:marcel.acosta@npc.gov)

Lee Webb, Federal Preservation Officer, National Capital Planning Commission,  
[lee.webb@npc.gov](mailto:lee.webb@npc.gov)

Dr. Kevin Griess, Superintendent, National Mall and Memorial Parks, National Park Service,  
[kevin\\_griess@nps.gov](mailto:kevin_griess@nps.gov)

Ken Gerold, MSD RCOF PARTNERS XL, LLC, [kgerold@bdtmsd.com](mailto:kgerold@bdtmsd.com)

Rebecca Miller, Executive Director, DC Preservation League, [rebecca@dcpreservation.org](mailto:rebecca@dcpreservation.org)  
Sheldon Rep, Chair, Committee of 100 on the Federal City, [info@committeeof100.net](mailto:info@committeeof100.net)  
Allison McManus, Executive Directive, Advisory Neighborhood Commission 2F,  
[2F@anc.dc.gov](mailto:2F@anc.dc.gov)  
Delano Hunter, District of Columbia Department of General Services, [Delano.Hunter@dc.gov](mailto:Delano.Hunter@dc.gov)  
Nina Albert, District of Columbia Deputy Mayor for Planning and Economic Development,  
[dmped.eom@dc.gov](mailto:dmped.eom@dc.gov)  
Anita Cozart, District of Columbia Office of Planning, [planning@dc.gov](mailto:planning@dc.gov)  
Gerren G. Price, President, Downtown DC Business Improvement District, [gerren.price@dc.gov](mailto:gerren.price@dc.gov)  
Laura Bower Hagood, Executive Director, Historical Society of Washington DC,  
[lhagood@dchistory.org](mailto:lhagood@dchistory.org)  
Valerie Gomez, National Endowment for the Arts, [gomezv@arts.gov](mailto:gomezv@arts.gov)  
Ann E. Piesen, FPO, National Endowment for the Humanities, [apiesen@neh.gov](mailto:apiesen@neh.gov)  
Betsy Merritt, National Trust for Historic Preservation, [emerritt@savingplaces.org](mailto:emerritt@savingplaces.org)  
Jo-Ann Neuhaus, Executive Director, Pennsylvania Quarter Neighborhood Association,  
[jo-ann@pennquarter.org](mailto:jo-ann@pennquarter.org)  
Carly Bond, Acting FPO, Smithsonian Institution, [bondc@si.edu](mailto:bondc@si.edu)  
Thomas Luebke, FPO, U.S. Commission of Fine Arts, [tluebke@cfa.gov](mailto:tluebke@cfa.gov)  
Joseph Blevins, FPO, U.S. Secret Service, [joseph.blevins@uss.s.dhs.gov](mailto:joseph.blevins@uss.s.dhs.gov)  
Alexander Taft, Washington Ringing Society, [master@washingtonringingsociety.org](mailto:master@washingtonringingsociety.org)