



December 5, 2025

VIA ELECTRONIC MAIL

Mr. David Maloney  
State Historic Preservation Officer  
Historic Preservation Office  
District of Columbia Office of Planning  
1100 4th Street, SW  
Suite E650  
Washington, DC 20024

Attention: Andrew Lewis

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

Dear Mr. Maloney,

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

1800 F Street, NW  
Washington, DC 20405-0002

[www.gsa.gov](http://www.gsa.gov)

PARTNERS XL, LLC, as the new proposed owner of the site. GSA intends to retain ownership 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.

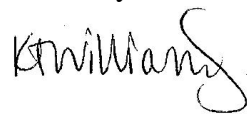
To avoid adverse effects, GSA proposes to convey the OPO with a preservation covenant that will provide adequate and legally enforceable conditions and restrictions on the Property in accordance with 36 CFR §800.5(b). Preliminary conversations with staff indicate that your office is willing and able 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 ACHP, 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.

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.

By copy of this letter, we are notifying the consulting parties of the termination and consultation for the new undertaking. ACHP has been invited to participate via a separate letter. GSA is sending a Doodle Poll link via email with potential dates for a Consulting Parties Meeting. We plan to schedule the meeting in early January to discuss the proposed disposal, draft covenant, and proposed termination of the PA. 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,



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

CC VIA EMAIL:

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