New York State
Parks, Recreation and
Historic Preservation

KATHY HOCHUL
Governor

KATHY MOSER
Commissioner

August 26, 2026

Via E-Mail

Avigail Charnov
General Service Administration (GSA)
1800 F ST NW
Washington, DC 20006

Re: GSA
Courthouse Hardening & Interior Renovation, Kenneth B. Keating FOB & USCH
100 State St. City of Rochester, Monroe County
26PR06218

Dear Avigail Charnov:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the documentation submitted in accordance with Section 106 of the National Historic Preservation Act of 1966, and 36 C.F.R. Part 800. These comments are those of the SHPO and relate only to Historic/Cultural resources.

We note that the Keating Federal Building contributes to the State and National Register Listed Four Corners - Genesee Crossroads Historic District. We have reviewed the Section 106 initiation letter dated July 28th, 2026, with the attached drawings and product specifications. The SHPO requires further information, including the materials requested below, in order to evaluate GSA's finding of adverse effect, which is not currently supported by the submitted materials, based on the documentation standards of the Section 106 implementing regulations. *See* 36 C.F.R. §§ 800.11(a), (e)

1. We note that the drawings in Attachment 3 are difficult to interpret. Please provide a high-resolution file of the drawings.
2. Current photos of the main entrance façade where the new windows are proposed to be inserted.
3. Documentation showing the original or historic appearance of the main entrance area of the building, if available.
4. Current photos showing overall views of one window bank where the interior security glazing is to be installed, and current photos showing close-up interior and exterior views of the window frames. These photos should be labeled and accompanied by a Photo Key Plan.
5. Regarding the proposed archaeological monitoring, will construction monitoring be performed by a 36 CFR 61 qualified archaeologist or construction personnel?
6. We note that GSA states in its July 28, 2026 letter that it will be consulting with the Albany Historic Resources Commission and the Historic Albany Foundation. The SHPO recommends that GSA consult with local consulting parties, including but not necessarily limited to the City of Rochester, Monroe County, and the Landmark Society of Western New York, Inc. Albany is over 200 miles from the Keating Federal Building, so the Albany-based parties identified by GSA would not be local consulting parties in this context.
7. Your July 28, 2026 letter states that GSA has received "a list of Native American tribes" from the New York State Department of Environmental Conservation. Please share GSA's consultation letters with Indigenous Nations, and any responses received from any of the Indigenous Nations.
8. Any feedback received from local governments or the public on the proposed undertaking.

We acknowledge GSA's interest in consulting with our office on ways to avoid, minimize, or mitigate potential adverse effects. The information requested above will not only help us to assess the potential adverse effects but will also facilitate an informed consultation process concerning avoiding, minimizing, or mitigating those effects.

If you have any questions, I can be reached at (518) 948-2067.

Sincerely,



Olivia Brazee
Senior Historic Site Restoration Coordinator
olivia.brazee@parks.ny.gov