

U.S. Department of Labor

Office of the Assistant Secretary
for Administration and Management
Washington, D.C. 20210



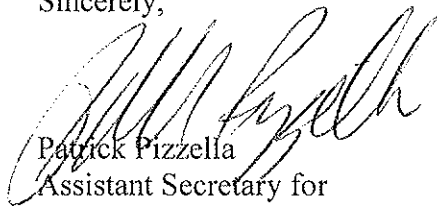
SEP 30 2008

Mr. John L. Nau, III
Chairman
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW
Suite 809
Washington D.C. 20004

Dear Mr. Nau:

Pursuant to the provisions of Executive Order No. 13287, Preserve America, please find enclosed one (1) copy of the 2008 historic property report submitted by the Department of Labor.

Sincerely,


Patrick Pizzella
Assistant Secretary for
Administration and Management

Enclosure

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SEP 30 2008

The Honorable Dirk Kempthorne
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington D.C. 20240

Dear Secretary Kempthorne:

Pursuant to the provisions of Executive Order No. 13287, Preserve America, please find enclosed one (1) copy of the 2008 historic property report submitted by the Department of Labor.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Pizzella". The signature is fluid and cursive, written over the printed name.

Patrick Pizzella
Assistant Secretary for
Administration and Management

Enclosure

**DOL RESPONSE TO RECOMMENDED QUESTIONS TO ANSWER
IN SECTION 3 PROGRESS REPORTS, SEPTEMBER 2008**

September 30, 2008

1. **Building upon previous Section 3 reports, please explain how many historic properties have been identified and evaluated by your agency in the past three years? Has your inventory improved? Please explain.**
 - **What is the total number of historic properties within your inventory? What is the total number of those historic properties that have been identified or evaluated as a “National Historic Landmark,” “National Register Listed,” or “National Register Eligible” for each of the past three years? How have these numbers increased in each of the last three years?**
 - **Within your inventory, what is the total number of cultural resources that have not been evaluated for eligibility to the National Register of Historic Places? How have these numbers changed in each of the last three years?**
 - **What is the total number of your agency’s property, plant, and equipment that have been identified as heritage assets for each of the past three years? How have these numbers changed in each of the last three years in your agency’s Required Supplementary Information?**

Properties identified and evaluated in the past three years include:

- Glenmont Job Corps Center (NY), a 1960s era campus, was reviewed by the New York State Historic Preservation Officer (SHPO), who determined that the proposed demolition of certain buildings, modifications of other buildings, and construction of new buildings, had no effect on any cultural resources associated with the site, or site eligibility for inclusion on the National Register of Historic Places.
- Grafton Job Corps Center (MA) – This facility has been included in the Grafton State Hospital Historic District, which has been listed on the National Register.
- Northlands Job Corps Center (VT) – The Vermont Division for Historic Preservation (SHPO) has determined that this site, the Former Weeks School, and eleven of the original buildings on the site, are eligible for listing on the National Register.

As a result of the above determinations, DOL inventory of Historic Properties has increased.

- Historic properties within the DOL inventory now include:

Six buildings and one historic district, which are listed on the National Register of Historic Places.

The Grafton Job Corp Center is within the Grafton State Hospital Historic District, which is listed on the National Register.

The Former Weeks School, now Northlands Job Corps Center, is listed on the Vermont State Register of Historic Places. The Vermont SHPO has determined that the Former Weeks School Historic District, and eleven buildings within that District, are Eligible for Listing on the National Register of Historic Places.

The Mine Safety & Health Administration's Mine Rescue Station (Oklahoma) houses documentation pertaining to the development and evolution of that facility, and a small collection of mining industry apparatus.

- A preliminary evaluation has been performed on all cultural resources within the DOL inventory. Each resource has one of six historic designations. Those resources that appear not to meet the criteria for listing on the National Register of Historic Places are designated "Unevaluated" by the local SHPO, and are subject to reevaluation as additional information becomes available. This was the case in August 2007, when the local SHPO determined that the former Weeks School, now the Northlands Job Corps Center, was eligible for listing on the National Register of Historic Places.
- Over the last three years, the total number of DOL's heritage assets has increased by two Historic Districts and eleven buildings. This increase reflects the designation of the Former Weeks School and the Massachusetts State Hospital as Historic Districts.

2. Describe your agency policies that promote and/or influence the identification and evaluation of historic properties.

- **How does the identification of historic properties and heritage assets relate to your agency's mission?**
- **What is your agency's policy for the stewardship of historic properties and heritage assets?**
- **What are the definitions of the major categories your agency uses to classify heritage assets?**
- **How does your agency define real property?**
- **Describe your agency's policy on the evaluation and nomination of historic properties to the National Register of Historic Places.**

All properties have gone through a preliminary evaluation and each has been given one of six Historic Designations. Each property is reevaluated prior to any alteration of such property.

- Historic properties are adaptively reused to directly support DOL's missions, including educating young adults and undertaking efforts to improve the health and safety of mine workers. Any heritage assets are stored for use by researchers.
- DOL complies with the Secretary of Interior's guidelines for stewardship of historic properties and heritage assets.
- The definitions of the major categories of DOL's heritage assets are Documents and Artifacts. These are primarily related to the mining industry and are housed at the Mine Rescue Station, McAlester, Oklahoma.
- DOL defines real property as Land, Buildings, and Structures.
- DOL's policy is to support community interest in its historic properties, and to request SHPO determination of eligibility for listing on the National Register of Historic Places. Properties which appear to meet the guidelines for listing on the National Register of Historic Places, for which SHPO determination has not been made, are designated as "Candidates" for listing. Undertakings associated with "Candidate" properties are submitted to SHPO for comment. Glenmont Job Corps Center, as noted in response to question one above, is an example of this activity.

3. How has your agency established goals for the identification and evaluation of historic properties including whether they have been met?

- **Has your agency established performance measures (such as benchmarks) for measuring progress in the identification of historic properties?**
- **If your agency has established benchmarks, how have they benefited your agency?**
- **If your agency has not established benchmarks, how does your agency measure progress?**

All properties have gone through a preliminary evaluation and each has been given one of six Historic Designations. Properties having received the Historic Designation of "Candidate", "Eligible", or "Listed" are reevaluated by the Historic Preservation Coordinator prior to commencing any activity involving such property; this evaluation is referred to DOL's Historic Preservation Officer for approval.

- All DOL's real property is managed using a computer system identified as the Engineering Support Contractor Information System (ESCIS). DOL's Engineering Support Contractor (ESC) maintains a property registration record in

this system for each piece of DOL real property. Performance benchmarks for each piece of property are recorded in the system at the time the property is registered. Any historic designation for such property is also recorded. The property registration is updated as conditions change. In addition, every Job Corps Center and Mine Safety & Health Administration (MSHA) facility is evaluated once every three years on a rotating basis as part of a required facility survey. During the facility survey, buildings and structures are evaluated for possible qualification as historic properties.

- The Historic Designation, or Benchmark, is useful to DOL in planning and maintaining the Long Range Development Plan for each of its sites. Evaluating each property for historic resources at least once every three years ensures that DOL maintains a current list of historic resources.

4. Describe any internal reporting requirements your agency may have for the identification and evaluation of historic properties, including collections (museum and archaeological).

Real Property is surveyed on a three year cycle, at which time facility information, including evaluation of historic properties, is updated in ESCIS; and a formal Facility Survey Report, including an update of the Long Range Development Plan, is prepared.

DOL has established internal policies and procedures that adhere to the standards and guidelines outlined in Section 110 of the National Historic Preservation Act (NHPA). Those policies and procedures are contained in paragraph 5.4 "Historic Preservation" of the U.S. Department of Labor publication entitled "Job Corps Program – Business Practices of Quality Procedures." Those policies include designation of the historic status of each property in the Job Corps inventory, by the DOL Preservation officer, for recording in the Engineering Contractors Information System (ESCIS). That information is also included in the Facility Survey Report, distributed to the appropriate DOL Regional Office and to the subject Job Corps Center. In addition, the Facility Survey Report is periodically reviewed with the Job Corps Center Operator.

All properties owned or controlled by the DOL have been reviewed by the DOL Preservation Officer for any historic significance, noting those that are listed, or eligible for listing, on the National Register of Historic Places. In addition, those properties that appear to meet the criteria for listing on the National Register of Historic Places have been designated as a "Candidate" for further evaluation, prior to any undertaking involving such property. At the time a modification of an historic property is under consideration, the DOL Preservation Officer consults with stakeholders in compliance with Section 110, NHPA, through the State Historic Preservation Officer. The result is either a finding of no adverse effect, or a memorandum of agreement (MOA), which then governs the implementation of such undertaking.

When buildings are being considered for demolition, a two part Demolition Package must be submitted, in order to trigger consideration of the demolition request. Part I, Historic

Preservation and Real Estate, is reviewed by the ESC's Historic Preservation Coordinator. When a building is designated Candidate, Eligible, or Listed on the National Register of Historic Places, or its historic significance otherwise needs to be reevaluated, the demolition request is referred to DOL's Historic Preservation Officer for a determination. If there is any question about the appropriate course of action, the DOL Historic Preservation Officer solicits SHPO's concurrence with his determination. DOL's Museum and archaeological assets are primarily composed of mine industry documents and artifacts, which are maintained by the Director of the Mine Rescue Station, McAlester, Oklahoma. Each Job Corps Center Director maintains student records, photographs of campus events, athletic trophies, and similar artifacts, for their possible historical significance.

5. Explain how your agency has employed the use of partnerships to assist in the identification and evaluation of historic properties.

- **Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the identification and evaluation of historic properties?**
- **How have partnerships benefited your agency?**

DOL has solicited the councils of various State Historic Preservation Officers to assist in the identification and evaluation of historic properties. DOL also consults the websites of state and local historical societies.

- As noted in earlier reports, DOL has determined that both the Job Corps' and the Mine Safety & Health Administration's mission requirements make the establishment of partnerships for historic economic development or tourism not practicable, particularly given the lack of interest exhibited by the non-federal groups in the communities in which these assets are located. There are no legal restrictions preventing the agency from entering into partnerships, etc. with local governments or interest groups interested in historic preservation, however.
- Partnering with SHPOs, along with state and local historic societies, has assisted DOL in identifying, evaluating, and maintaining its historic properties.

6. Provide specific examples of major challenges, successes, and or opportunities your agency has experienced in identifying historic properties over the past three years.

Over the past three years, DOL has had a variety of experiences identifying historic properties, including the following:

The Grafton Job Corps Center (MA) was reevaluated to see if a change in historic

designation was appropriate, as a consequence of its inclusion in the nomination of the "Massachusetts State Hospital and State School Systems Historic District". Research disclosed that the nomination was subdivided and that the Grafton Job Corps Center was now a part of the "Grafton State Hospital Historic District", which has been listed on the National Register of Historic Places.

The Glenmont Job Corps Center (NY), a 1960s era campus, was submitted to the New York SHPO, who determined that the proposed demolition of certain buildings, the modifications of other buildings, and the construction of new buildings, would have no effect on the center's cultural resources, or impact its eligibility for listing on the National Register of Historic Places.

The Potomac Job Corps Center (District of Columbia), the former DC Village Orphanage, is being adaptively reused as a Job Corps Center. The DC SHPO determined that three original cottages were of historic significance, and should be preserved. DOL has preserved them and is adaptively reusing them as transitional student housing.

The Northlands Job Corps Center (Vermont), originally the Vermont Reform School in Vergennes, was built in 1874 for "discipline, correction, and rehabilitation" of youthful offenders. In 1900, the Reform School was renamed Vermont Industrial School, and in 1937 it was named "Weeks School" in honor of Governor John E. Weeks, a former trustee. After visiting the site in 2007, the Vermont SHPO reported that the Weeks School Complex was listed on State Register of Historic Places, and that it, and eleven buildings within the complex, were eligible for listing on the National Register of Historic Places.

7. Explain how your agency has protected historic properties.

- **What other forms of protection has your agency provided for historic properties?**
- **How has your agency protected, stabilized, rehabilitated, or monitored historic properties?**

Steps underway, or planned to meet the protection, rehabilitation, and management needs of historic properties, include:

- DELAWARE VALLEY JCC
"Listed" as St. Joseph's Seminary

A project for interior renovations and building systems upgrades has recently been completed. This project up-graded the heating system, provided air-conditioning, mitigated asbestos containing insulation and lead based paint, improved lighting, and reconfigured space to better support Job Corps functions.

Conservation of the buildings' envelope, including masonry, roofing, and doors, is planned.

- WHITNEY M YOUNG JCC
"Listed" as Lincoln Institute Complex

Building stabilization is being accomplished through an ongoing preservation program, including re-pointing masonry, and repairing/replacing roofing, flashings, gutters, downspouts, and windows.

- CINCINNATI JCC
"Listed" as Our Lady of Mercy High School

Building stabilization has recently been accomplished, including re-pointing masonry, repairing/replacing roofing, flashings, gutters, downspouts, and windows. Interior spaces are being reconfigured on an ongoing basis, to better support the Job Corps functions they house. Mechanical systems upgrades are planned for the future.

- SOUTH BRONX JCC
"Eligible" as Salvation Army Officer's Training Center
Originally: Messiah Home for Children

Emergency repair of masonry has recently been accomplished. A comprehensive preservation project had been designed over the past three years, which includes replacement of mechanical and electrical systems, installation of air-conditioning, replacement of roofing, flashing, and downspouts, and restoration of interior finishes. However, this project is currently on hold, due to funding limitations.

- POTOMAC JOB CORPS CENTER
The former DC Village Orphanage is being adaptively reused by DOL as a Job Corps Center. The DC SHPO determined that three original cottages were of historic significance and should be preserved. DOL has preserved them and adaptively reused them as transitional student housing. In the process, the masonry structures were conserved, roofing, gutters and downspouts, doors and windows and interior partitions were replaced. New mechanical, electrical, plumbing, and fire protection systems were installed, and code compliance upgrades were made.

If future development entails renovation or rehabilitation work on an historic property, the SHPO will be contacted prior to the commencement of any work activity.

8. Describe your agency policies that promote and/or influence the protection of historic properties.

- **How is this policy incorporated into your agency's strategic plan?**

- **Does your agency have an asset management plan? If not, why? If yes, what planning and management requirements do historic real properties have in your agency's asset management plan?**
- **Has your agency entered into any management contracts with other parties to protect your historic properties, including monitoring, repair, stabilization, and rehabilitation? If yes, have these been effective? What are the advantages and disadvantages of these contracts?**
- **What types of performance criteria must be met in the stewardship and capital planning for the use of historic properties?**
- **Does your agency utilize a deferred maintenance program for protection of historic properties?**

Steps Underway, or Planned to both Promote and Influence the Protection of Historic Properties, including --

- DOL has a strategic plan which incorporates the agency's real property Asset Management Plan. The real property Asset Management Plan covers the agency's historic properties and provides for the management of these properties in much the same way as the agency's other real property.
- Maintenance funds are provided as a part of center operations to ensure that all on site facilities receive proper maintenance care, especially the historic properties.
- Separately, capital improvement funding is set aside annually for construction, rehabilitation and acquisition. Due to funding limitations, funding allocated to meet facility needs follows a very specific process, and can be summarized in the following steps:
 1. Identify facility deficiencies and funding needs
 2. Evaluate and prioritize needs
 3. Allocate funding to areas having the greatest need
 4. Procure appropriate services to address needs.

The Facility Survey process, a thorough building condition/evaluation exercise, is the primary vehicle used to identify and prioritize needs. This exercise pertains not only to the buildings that are considered historic, but also to all the individual buildings located on each of the Job Corps Centers. All building deficiencies identified during the survey process are classified by types such as:

Class I	Life/safety deficiencies
Class II	Code violations
Class III	Building maintenance, repairs or replacement

Class IV Programmatic needs

A ranking of these deficiencies is established based on the above criteria and the degree of severity of the deficiencies. Funding for remediation is then subsequently provided to those areas demonstrating the greatest need. There is a Greatest Needs Matrix, developed by DOL, that is used to evaluate and rank all the deficiencies found during the evaluation process.

- Chapter Five of DOL's Asset Management Plan (AMP), produced pursuant to Executive Order No. 13327 - Federal Real Property Asset Management, covers the disposition of buildings (i.e., constructed assets) and real property, including historic property, that are no longer needed to carry out the agency's mission. Chapter Five of the AMP includes provisions for the application of a Disposal Algorithm to buildings targeted for disposition.

Section 5.4 of Chapter 5 of the AMP lays out the specific steps DOL will take prior to the disposition of any excess real property. These steps include an historic preservation review, to determine whether the property has historic significance. The relevant SHPO will be consulted prior to any disposition of historic property held by DOL. Pursuant to Section 111 of the Historic Preservation Act of 1966, DOL has determined that further specific procedures for the leasing or other disposition of historic properties is not necessary or practicable. Should this situation change, however, DOL will contact the ACHP.

- DOL has not entered into any management contracts with other parties specifically to protect historic properties. Overall management of a Job Corps Center is accomplished by the Center Operator, under contract with the DOL Regional Office. The Center Operator is responsible for management of all day to day educational and administrative activities, as well as operation and maintenance of the Job Corp Center, including monitoring, repair, stabilization, and rehabilitation of historic properties at the center. Major rehabilitation projects, including those for historic properties, may be undertaken by Job Corps as Regional or National projects, in which case the Regional or National Job Corps Office will take the lead in managing a specific contract for a specific project. Where undertakings involve historic properties, DOL requires that the work be done in compliance with the Secretary of Interior's guidelines.

9. Explain how your agency has employed the use of partnerships to assist in the protection of historic properties.

- **Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the protection of historic properties?**

- **How have partnerships benefited your agency?**
- **How successful has your agency been in developing partnership agreements (e.g. cooperative, cost-share, interagency, research) for the protection of historic properties?**

As noted in earlier reports, DOL has determined that both the Job Corps' and MSHA's mission requirements make the establishment of partnerships for historic economic development or tourism not practicable, particularly given the lack of interest exhibited by the non-federal groups in the communities in which these buildings are located. There are no legal restrictions preventing the agency from entering into partnerships, etc. with local governments or interest groups interested in historic preservation, however.

10. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in protecting historic properties over the past three years.

Over the last three years, DOL has had a variety of opportunities to protect historic properties, including the following:

- The Grafton Job Corps Center was reevaluated to see if a change in historic designation was appropriate as a consequence of its inclusion in the nomination of the "Massachusetts State Hospital and State School Systems Historic District".

Research disclosed that the nomination was subdivided and that the Grafton Job Corps Center was now included within the "Grafton State Hospital Historic District", which has been listed on the National Register of Historic Places. In the interim, all historic properties in active use have been maintained and several rehabilitated in compliance with the Secretary of Interior's guidelines. There are three vacant historic properties that have deteriorated over the years, however.

- The Potomac Job Corps Center, the former DC Village Orphanage, is being adaptively reused by DOL as a Job Corps Center. The DC SHPO determined that three original cottages were of historic significance and should be preserved. DOL has preserved them and adaptively reused them as transitional student housing. As a consequence, the masonry structures were conserved; roofing, gutters and downspouts, doors and windows, and interior partitions were replaced. New mechanical, electrical, plumbing, and fire protection systems were installed, and code compliance upgrades were accomplished.

11. Explain how your agency has used historic properties.

- **What is the total number of your agency's historic properties with an assigned mission and/or purpose?**
- **In what ways has your agency used technologies and/or media, including the Internet, to promote heritage tourism as a use of historic properties?**
- **If there are no legal restrictions, how has your agency developed or improved procedures for supporting local economic development and heritage tourism for the use of historic properties?**

DOL uses its historic properties for educational, administrative and housing functions, in direct support of its various missions.

- All active historic buildings are used by DOL in direct support of its missions. There are several leased buildings within historic districts that are vacant, and DOL is trying to return these buildings to their owners.

DOL has determined that both the Job Corps' and the Mine Safety & Health Administration's mission requirements make the establishment of partnerships for historic economic development or tourism not practicable; particularly given the lack of interest exhibited by the non-federal groups in the communities in which these properties are located. There are no legal restrictions preventing the agency from entering into partnerships, etc. with local governments or interest groups interested in historic preservation, however.

12. Explain the overall condition of the historic properties within your agency's control.

- **What efforts has your agency undertaken to improve the condition of historic properties?**
- **Discuss how the condition of your historic properties affects your agency's ability to use them in support of its mission.**

Overall, DOL's historic properties are in good condition, requiring periodic systems upgrades and preventative maintenance. However, a few buildings within the recently designated historic districts have been vacant for some time, and are in a deteriorated condition.

Historic properties that have undergone rehabilitation over the past three years include:

- SOUTH BRONX JCC
"Eligible" as Salvation Army Officer's Training Center