

U.S. Department of Labor

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



OCT 14 2011

Mr. Milford Wayne Donaldson
Chairman
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW
Suite 803
Washington, D.C. 20004

Dear Mr. Donaldson:

Enclosed are two hardcopies of the Department of Labor's (DOL) 2011 historic property report as required by Executive Order No. 13287.

Edward Campbell, DOL's Real Property Officer spoke with Ms Katharine Kerr of your staff and she offered to provide a copy of the report to Department of Interior. Additionally, Mr. Campbell will provide Ms. Kerr with a softcopy of the report via email.

If you have questions or need additional information, kindly contact Mr. Phil Puckett (DOL's Real Property Executive) at 202.693.6665 or Mr. Campbell at 202.693.6653.

Sincerely,

A handwritten signature in cursive script that reads "Charlotte Hayes".

Charlotte Hayes
Historic Property Officer

Enclosure

“PRESERVE AMERICA” SECTION 3

DEPARTMENT OF LABOR (DOL) REPORT

SEPTEMBER 2011

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?

The total number of historic properties within the DOL inventory is:

- a) LISTED--18 buildings, one structure and five lands are on the National Register of Historic Places*
- a) ELIGIBLE—one building to be on the National Register of Historic Places*
- b) CANDIDATE--63 buildings to be listed on the National Register of Historic Places*
- c) IN-PENDING—two land areas for eligibility determination*

There were no designations made in 2009 and 2011. In 2010 nine buildings and the land at Cascades Job Corps Center were listed on the National Register. In the past three years, DOL’s inventory of Historic Properties increased in 2010 by the nine buildings and land as set forth above.

- 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?

The total number of cultural resources that have not been evaluated for eligibility to the National register is zero. An evaluation has been performed for all cultural resources within the DOL inventory.

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?

2009 (includes the last quarter of 2008): No property, plant, or equipment was identified as heritage assets.

2010: Nine buildings and the land at Cascades Job Corps Center were "Listed" on the National Registry of Historic Places. (The land, which is the site of a former mental hospital, designed by the Olmstead Brothers in 1911, was elevated to Historic District status with most of its buildings bearing the designation of Historic Contributing Buildings. Therefore both the land and the buildings are now listed in the National Registry. The buildings were designed in the Spanish colonial revival style and were built between 1922 and 1947.)

2011: No property, plant, or equipment was identified as heritage assets.

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?

Historic properties are either used or adaptively reused to directly support DOL's mission, including educating young adults and undertaking efforts to improve the health and safety of mine workers. Heritage assets are stored for use by researchers.

- What is your agency's policy for the stewardship of historic properties and heritage assets?

DOL complies with the Secretary of Interior's guidelines for stewardship of historic properties and heritage assets.

- What are the definitions of the major categories your agency uses to classify heritage assets?

Primarily, DOL's heritage assets are documents and artifacts related to the mining industry and are housed at the Mine Rescue Station, McAlester, Oklahoma.

- How does your agency define real property?

DOL defines real property as Land, Buildings, and Structures.

- Describe your agency's policy on the evaluation and nomination of historic properties to the National Register of Historic Places.

The Department of Labor has preliminarily evaluated all properties under its control and given each property one of six Historic Designations. Each property is reevaluated prior to any undertaking. Properties which appear to meet the guidelines for listing on the National Register of Historic Places are evaluated.

When a State Historic Preservation Officer (SHPO) has not made a determination, a property is designated as "Candidate" for listing. Undertakings for "Candidate" properties are submitted to SHPO for comment. 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. ,

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

The Department of Labor established and achieved the goal of preliminarily evaluating and giving one of six Historic Designations to all properties. Properties with Historic Designation of "Candidate", "Eligible", and "Listed" are reevaluated by the Historic Preservation Coordinator prior to commencing any undertaking, and referred to DOL's Historic Preservation Officer for approval to proceed.

- Has your agency established performance measures (such as benchmarks) for measuring progress in the identification of historic properties?

DOL established benchmarks. DOL's Engineering Support Contractor (ESC) maintains a property registration database in the Engineering Support Contractor's Information System (ESCIS), where at the time of property registration a property's Historic Designation is listed thus establishing a benchmark for that property. Property registration is updated as conditions change. In addition to the above cited properties a benchmark exists for, every Job Corps Center and Mine Safety and Health Administration (MSHA) facility which are evaluated once every three years on a rotating basis as part of a required facility survey process. During the facility survey process, buildings and structures are evaluated for possible qualification as historic properties. DOL measures itself against meeting the evaluation timelines set forth above.

- If your agency has established benchmarks, how have they benefited your agency?

DOL has established benchmarks. Evaluating each property for historic resources at least once every three years ensures that DOL maintains a current list of historic resources.

- If your agency has not established benchmarks, how does your agency measure progress?

DOL has established benchmarks.

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

DOL's internal reporting requirement includes a real property survey on a three-year cycle, including an evaluation of historic properties and a formal Facility Survey Report. An updated Long Range Development Plan is prepared.

DOL has established internal policies and procedures that adhere to the standards and guidelines outlined in NHPA, Section 110. Those policies and procedures are addressed in paragraph 5.4, "Historic Preservation", of the DOL-Job Corps Program Business Practices Manual. Those policies include designation of the status of each property in the Job Corps inventory by the DOL Preservation Officer, which is recorded in the ESCIS database. The statuses used for all properties are: "UNELIGIBLE", "CANDIDATE", "ELIGIBLE" AND "LISTED". This information is included in the Facility Survey Report, distributed to the DOL Regional Office and to the subject Job Corps Center. Also, the Facility Survey Report is reviewed with the Job Corps Center Operator.

All properties either owned or controlled by the DOL for support of Job Corps have been reviewed by the DOL Preservation Officer for their historic significance, noting those that are listed, or eligible for listing, on the National Register of Historic Places. Furthermore, those properties which appear to meet the criteria for listing on the National Register of Historic Places have been designated as "CANDIDATE", for further evaluation prior to an undertaking. When an undertaking at an historic property is considered, the DOL Preservation Officer consults with stakeholders in compliance with NHPA Section 11, through the SHPO. The result is either a finding of no adverse effect or a memorandum of agreement (MOA), which then governs the implementation of the undertaking.

When buildings are being considered for demolition, a two part Demolition Package must be submitted in order to begin processing the demolition request. Historic Preservation and Real Estate, Part 1 of the demolition package, is reviewed by the ESC 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. When appropriate, DOL's Historic Preservation Officer solicits SHPO concurrence with his determination.

MSHA's historic collections primarily consist of artifact and documents, 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, as historic preservation work in progress.

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?

There are no legal restrictions preventing Job Corps and the Mine Safety and Health Administration (MSHA) from entering into partnerships with local governments or groups interested in historic preservation. However, both the Job Corps and the Mine Safety & Health Administration mission requirements make the establishment of partnerships for historic economic development or tourism impractical.

- How have partnerships benefited your agency?

Working cooperatively 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 in evaluating or identifying historic properties, including the following:

- a) Three buildings and a structure at the Delaware Valley Job Corps Center were reevaluated to see if a change in historic designation was appropriate. The Delaware Valley Job Corps center is the former St. Joseph's Seminary, which is "LISTED" in the National Register of Historic Places. As a result of the reevaluation in collaboration with New York State Historic Preservation Officer, three buildings and one structure were added to the registry, bringing the total number of buildings "LISTED" on the National Register of Historic Places at Delaware Valley JCC to five buildings and one structure.*
- b) The Washington State SHPO had determined that four original buildings at the Cascades Job Corps Center were of historic significance and should be protected. As a result, the historic building inventory at the center was expanded. Four buildings were designated as "CANDIDATE" for listing on the National Registry of Historic Places.*

7. Explain how your agency has protected historic properties.

Over the past three years, DOL has completed a variety of projects to protect and preserve historic properties which include:

a) SOUTH BRONX JCC

Building #1 (built in 1908)

Named a New York City Landmark in 1997

A project to evaluate the building envelope and building systems, and to recommend appropriate remedial actions and design for its conservation and preservation was funded in 2009. Building envelope deterioration caused water infiltration, which in turn caused interior damage. The HVAC, plumbing and electrical systems are over 100 years old and obsolete. This undertaking was approved by the New York City Landmark Preservation Commission with a few amendments. Prior to renovation, the project team will seek SHPO section 106 approval.

b) CINCINNATI JCC

Building #1 (built in 1897)

Listed on the National Register of

Historic Places as Our Lady of Mercy High School

A project to replace the deteriorated and leaking original slate roof was proposed in 2009. SHPO recommended to seek bids from roofing contractors specialized in historic slate roof repair and/or replacement and to evaluate the feasibility of roof repair versus replacement. This project is currently in procurement.

c) DELAWARE VALLEY JCC

"LISTED" as St. Joseph's Seminary

A project is planned for exterior renovations at three "LISTED" buildings. The goal of this project is to conserve and preserve the buildings' envelopes. The scope of work includes: masonry repairs (re-pointing and re-installation of stone and brick veneer, re-pointing and realignment of stone grade stairs) and replacement of roofing materials (Spanish tiles, stamped galvanized metal and slate tiles).

d) WHITNEY M. YOUNG JCC

"LISTED" as Lincoln Institute Complex

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

If future development entails renovation or rehabilitation work in an historic property, the SHPO will be contacted upon the initiation of the project. All undertakings shall be in conformance with 36 CFR 800.2, Section 106 processes.

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?

DOL's strategic plan vision is "good jobs for everyone" which includes preparing workers for good jobs and ensuring workplaces are safe and healthy. Job Corps and MSHA are key players in these strategic goals. Managing historic properties within the purview of these two agencies includes maintenance funds provided as a part of center operation to ensure that all on-site facilities receive proper maintenance, especially the historic properties.

- 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?

a) Chapter Five of the agency'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. Note, however, that this algorithm has not yet been issued by the Federal Real Property Council.

b) Section 5.4 of Chapter 5 lays out the specific steps DOL will take prior to the disposition of any excess real property; and 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.

- 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?

DOL has not entered into any management contracts with other parties specifically to protect historic properties.

NOTE: 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 involving historic properties, may be undertaken as Regional or National projects, in which case the Regional or National Office may 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.

- What types of performance criteria must be met in the stewardship and capital planning for the use of historic properties?

The ESC conducts the Facility Survey process, a thorough building condition/evaluation exercise, which is the primary vehicle in identifying and prioritizing needs. This exercise pertains not only to the buildings that are considered historical, 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:

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| <i>Class I</i> | <i>Life/safety deficiencies</i> |
| <i>Class II</i> | <i>Code violations</i> |
| <i>Class III</i> | <i>Building maintenance, repairs or replacement</i> |
| <i>Class IV</i> | <i>Programmatic needs</i> |

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 areas demonstrating the greatest needs. There is a Greatest Needs Matrix that is applied to all of the deficiencies found during the evaluation process.

- Does your agency utilize a deferred maintenance program for protection of historic properties?

No. Capital improvement funding is set aside annually for construction, rehabilitation and acquisition. Due to budget constraints, funding allocation to address facility needs follows a very specific process and can be summarized into the following steps:

- 1. Identify facility deficiencies and funding needs*
- 2. Evaluate and prioritize needs*
- 3. Allocate funding to areas having the greatest needs*
- 4. Procure appropriate services to address needs.*

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

Given the nature of the Job Corps program, DOL has determined that both the Job Corps and MSHA mission requirements make the establishment of partnerships for historic economic development or tourism impractical.

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

There are no legal restrictions preventing the relevant agencies from entering into partnerships with governments or interest groups interested in the protection of historic properties; however these agencies mission requirements make partnerships impractical.

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

Challenge Example:

- a) As a result of Hurricane Katrina, three buildings at Gulfport Job Corps Center are proposed for demolition in the long range plan. The three buildings were part of an old segregated school and have social significance for the local African American community. Job Corps management traveled to the community to hear the citizens' concerns. Department of Labor ask the Mississippi Department of Archives and History to perform a preliminary evaluation of the buildings and assist DOL with a way forward to officially determine the historical significance (or lack thereof) of the three buildings.*

Successes Examples:

- b) Northlands Job Corps Center proposed to replace deteriorated wood porch elements at three original 1914 dormitory buildings, with synthetic materials. After ESC consulted with SHPO, it was concluded that these elements should be replaced in-kind with new wood materials to match existing. Each of these buildings is a "CANDIDATE" to be listed on the National Registry of Historic Places.*
- c) Grafton Job Corps Center was reevaluated to see if a change in historic designation was appropriate as a result of it being included in 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.*

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?

DOL has 18 buildings, one structure and five lands "LISTED" on the National Register of Historic Places, and uses these 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, that DOL is trying to return to their owners.

- In what ways has your agency used technologies and/or media, including the internet, to promote heritage tourism as a use of historic properties?

Given the nature of the Job Corps program, DOL has determined that both the Job Corps and the MSHA mission requirements make the establishment of partnerships for historic economic development or tourism impractical.

- 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?

Given the nature of the Job Corps program, DOL has determined that both the Job Corps and MSHA mission requirements make the establishment of partnerships for historic economic development or tourism not practical. However, there are no legal restrictions preventing the agency from entering into partnerships, etc. with local governments or interest groups interested in historic preservation.

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

Most of DOL's historic properties are in good condition, requiring periodic systems upgrades and preventative maintenance. However, some of the historic buildings have been vacant for some time and are in deteriorated condition.

- What efforts has your agency undertaken to improve the condition of historic properties?

As is the case with all owned real property under the custody and control of DOL, we evaluate each building on a rolling three year timeline where deficiencies are

noted and included in the long-range plan for correction. Our ability to provide the necessary improvements is predicated on adequate appropriations.

- Discuss how the condition of your historic properties affects your agency's ability to use them in support of its mission.

Improving the condition of historic properties has extended their useful lives, improved indoor air quality, improved life safety systems, and adapted the properties to better accommodate their functions.

13. Describe your agency policies that promote and/or influence the use of its historic properties.

DOL policies regarding historic properties relate solely to the use of those properties for the mission of the relevant agencies, Job Corps and MSHA.

- Have you incorporated these policies into your agency's strategic plan?

DOL's established policies and procedures are applicable to all agencies within the department, and are administered at the agency level. Consequently, MSHA's administration of its historic properties are similar in nature to that specified in U.S. Department of Labor-Job Corps Program, ESC and PMC Business Practices Manual of Quality Procedures, Chapter 5-4.

- Does your agency have an asset management plan? If not, why? If yes, explain how this plan accounts for the management of historic properties.

Chapter Five of the agency'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. Note, however, that this algorithm has not yet been issued by the Federal Real Property Council.

- What policies does your agency have to involve stakeholders in its resource management and planning efforts to identify opportunities for the use of its assets in economic development and heritage tourism?

Groups are consulted when Job Corps is making repairs or alterations to its historic buildings; however Job Corps Centers because of their mission are no sites for heritage tourism or economic development.

- Does your agency have protocols for its managers to identify historic properties that are available for transfer, lease, or sale? What criteria are considered when recommending such actions?

Section 5.4 of Chapter 5 lays out the specific steps DOL will take prior to the disposition of any excess real property; and 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.

- When negotiating leases, how does your agency budget for the use of lease proceeds in the rehabilitation and maintenance of historic properties?

DO does not lease out property and therefore receives no proceeds.

14. Explain how your agency has used Section 111 (16 U.S.C. § 470h-3) of NHPA in the protection of historic properties.

DOL has neither transferred nor disposed of any historic properties and therefore has no experience with Section 111 (16 U.S.C. § 470h-3) of NHPA.

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

DOL has not used partnerships to assist in the use of historic properties.

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

Over the past three years, DOL has had challenges, successes, and opportunities in using historic properties as follows:

- a) At Hawaii/Maui Job Corps Center, a project to replace the failed underground water supply piping to the main building was completed in April 2011. The building, which is a "CANDIDATE" to be listed on the National Registry of Historic Places, was built in 1900. The old piping was corroded and leaked into*

the building. Replacing the piping eliminated the risk of damage to the building interior and infrastructure and improved the water quality.

- b) At Grafton Job Corps Center, a project to reuse a vacant building which was part of the original hospital (built 1905) is planned. DOL has preserved this building and plans to adaptively reuse it for education functions. In the process, the masonry structure will be conserved. Roofing, gutters and downspouts, doors and windows and interior partitions will be replaced. New mechanical, electrical, plumbing and fire protection systems will be installed and code compliance upgrades will be accomplished.*