

EXECUTIVE ORDER 13287, “PRESERVE AMERICA”

SECTION 3: IMPROVING FEDERAL AGENCY PLANNING AND ACCOUNTABILITY



BASELINE REPORT ARMED FORCES RETIREMENT HOME

JANUARY 2010



**Armed Forces Retirement Home
Office of the Chief Operating Officer
3700 N. Capitol Street, NW
P. O. Box 1303
Washington, DC 20011-8400**

January 27, 2010

Mr. Reid Nelson
Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Mr. Nelson,

The Armed Forces Retirement Home – Washington (AFRH-W) is pleased to present the following *Preserve America Section 3 Baseline Report for AFRH-W* to the Advisory Council on Historic Preservation (ACHP). This report satisfies baseline reporting requirements of Executive Order 13287 (EO 13287), “Preserve America,” specifically those stipulated in Section 3(a)-(b), “Improving Federal Agency Planning and Accountability.” As requested, AFRH-W has included a second copy of the report for distribution to the U.S. Department of the Interior.

As directed by Section 3(b) of EO 13287, this report will provide the results of a review of AFRH’s regulations, management policies, and operating procedures for compliance with Sections 110 and 111 of the National Historic Preservation Act of 1966, as amended (NHPA). In addition to these findings, this report will also provide an assessment of the current status of the agency’s historic properties. To ensure that this report satisfies the data collection needs of ACHP, this report follows guidance provided in *Advisory Guidelines Implementing Executive Order 13287, “Preserve America” Section 3: Improving Federal Agency Planning and Accountability*, which was published by the ACHP in October 2003.

In accordance with Section 3(c), AFRH will submit its first Section 3 Progress Report by September 30, 2011, consistent with the triennial schedule for Section 3 progress reports for all Federal agencies with real property management responsibilities.

If ACHP has any questions about the *Preserve America Section 3 Baseline Report for AFRH-W*, please contact me at 202-730-3445.

Sincerely,

Joseph S. Woo
Federal Preservation Officer
Armed Forces Retirement Home

Enclosures

Introduction

The Armed Forces Retirement Home (AFRH) is an independent Federal agency that manages the nation's oldest continuously operating retirement community for enlisted military personnel. The agency was created in 1991 when Congress incorporated the United States Soldiers' and Airmen's Home in Washington, D.C., and the United States Naval Home in Gulfport, Mississippi, into a single independent establishment in the Executive Branch. In 2002, Congress reorganized the administration of the agency, replacing its military Board of Commissioners and governor system with a civilian model headed by a single chief operating officer. As that time, the Naval Home was re-named the Armed Forces Retirement Home-Gulfport (AFRH-G), and the Washington, D.C. facility was re-named the Armed Forces Retirement Home-Washington (AFRH-W) — distinguishing them from AFRH as the agency. Today, AFRH owns and manages these two campuses with a mission to fulfill our nation's commitment to its veterans by providing a premier retirement community, exceptional residential care, and extensive support services.

AFRH-W: The Washington facility is a 272-acre campus located in the northwest quadrant of the District of Columbia. The property now known as AFRH-W was established in 1852 as the northern branch of a new Congressionally organized U.S. Military Asylum, an institution created to provide care for old and disabled veterans of the regular Army. AFRH-W is the only surviving branch of the three original branches established in 1852 and has remained a symbol of the nation's commitment to its military veterans for over 150 years. The entirety of AFRH-W is listed as a historic district in the National Register of Historic Places and in the District of Columbia Inventory of Historic Sites. The AFRH-W Historic District includes 144 contributing resources. Sections of AFRH-W have further designation as the United States Soldiers' and Airmen's Home National Historic Landmark and the President Lincoln's and Soldiers' Home National Monument.

AFRH-G: The Gulfport facility is a 47-acre campus fronting the coast of the Gulf of Mexico in Gulfport, Mississippi. The property now known as AFRH-G originally served as the Gulf Coast Military Academy, a preparatory school for boys founded in 1912 and closed in 1951. The land was purchased by the United States Department of the Navy in the late 1960s to serve as the new site for the United States Naval Home, replacing the historic facility in Philadelphia, Pennsylvania. In 2005, the Gulfport facility was devastated by Hurricane Katrina, and the late-twentieth-century residential structure that occupied the site at the time suffered severe water damage necessitating demolition. Construction of a new residential facility is currently underway and expected to be completed in 2010. The site's Chapel is the only historic resource located within the facility. Although the Chapel was also severely damaged during the Hurricane, AFRH has taken extensive measures to preserve and restore the historic building.

As an independent Federal agency reporting to the Department of Defense, AFRH has produced this report to satisfy requirements stipulated in Executive Order 13287, "Preserve America," which was issued by President George W. Bush on March 3, 2003. The intention of the Executive Order is to reaffirm the Administration's commitment to Federal stewardship

of historic properties and to promote inter-governmental cooperation and partnership for the preservation and use of historic properties. Section 3, "Improving Federal Agency Planning and Accountability," is a major component of the Executive Order and calls for the collection of data on historic property holdings. According to Sections 3(a)-(c), individual agencies are to prepare and submit to the Chairman of the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior an assessment of:

- the current status of their inventory of historic properties as required by Section 110(a)(2) of the National Historic Preservation Act (NHPA);
- the general conditions and management needs of such properties;
- the steps underway or planned to meet the management needs of such properties; and,
- an evaluation of the suitability of the agencies' types of historic properties to contribute to community economic development initiatives, including heritage tourism.

The Executive Order also instructs agencies to review their regulations, management policies, and operating procedures for compliance with Sections 110 and 111 of the NHPA, and to provide the results of that review to the ACHP and the Secretary of the Interior.

In accordance with Section 3(c) of the Executive Order, ACHP uses the individual agency data as the primary basis for the preparation of a triennial report to the President on the state of the Federal Government's historic properties and their contribution to local economic development. To ensure that AFRH provides ACHP with all data needed to complete ACHP's next triennial report (to be submitted in 2011), the following report is consistent with the "Advisory Guidelines for Implementing Executive Order 13287," (Guidelines) which were published by ACHP in October 2003. As such, the organization of this report is based on the "10 Major Questions to Address in Section 3 Reports" and their associated sub-questions, which are outlined in the Guidelines. This approach to the organization is intended to clearly address how AFRH is meeting its stewardship responsibilities for historic properties by identifying, protecting, and using historic properties under their ownership or control.

Table of Contents:

Question 1:	What types of historic properties does your agency own or manage and how is this information collected and maintained?	5
Question 2:	How would you characterize the distribution and general condition of these properties?.....	9
Question 3:	What reporting mechanisms and systems are used by your agency for carrying out its resource management responsibilities?	12
Question 4:	Does your agency coordinate its data gathering for historic properties under its ownership or control with required Federal audit, accounting, and financial management reporting?	14
Question 5:	How is your agency fulfilling its historic preservation program responsibilities under Section 110 of NHPA?.....	16
Question 6:	How is your agency complying with Section 111 of NHPA when historic properties are transferred, leased, or sold?	24
Question 7:	If your agency does not currently have a historic preservation program or procedures for complying with sections 110 and 111, what future actions will be taken to meet these statutory requirements?.....	27
Question 8:	What issues regarding your agency's mission, internal policies, location of its inventory of historic properties, or use of such properties could potentially hinder the agency's ability to contribute to community economic development initiatives?	28
Question 9:	Does your agency have programs and policies that help it to identify historic preservation opportunities and promote preservation through partnerships?	31
Question 10:	How would your agency characterize its overall progress in meeting its property management and stewardship responsibilities since filing its last Executive Order 13287, Section 3, Report?	33

Question 1: What types of historic properties does your agency own or manage and how is this information collected and maintained?

1a. How does your agency determine the percentage of real property holdings that might meet the statutory definition of historic properties (16 V.S.C. 470w(5))?

AFRH-G: As a result of Department of the Navy's 1960s modernization of the campus for use as the United States Naval Home and the devastation caused by Hurricane Katrina in 2005, the Chapel of AFRH-G is the only historic building extant within the boundaries of the facility.

AFRH-W: During a 2006-2007 cultural resource survey effort, AFRH identified all objects, buildings, structures, and sites (landscape and archeology) located within the boundaries of the 272-acre Washington campus, resulting in a comprehensive resource inventory. The survey team systematically documented each resource regardless of its age of construction, integrity, or association to the property. The survey resulted in the collection of documentation relating to the physical characteristics of each resource and noting its location, materials, design attributes, construction techniques, alterations and additions, and function. Archeological Sensitivity Zones, which were identified as part of a Phase 1a Archeological Investigation, were also included in the resource inventory. The inventory includes a total of 250 resources.

Once the documentation effort was complete, each resource was evaluated individually by noting its integrity and significance and by assessing how the resource contributes to the overall integrity and significance of the property as the nation's oldest residential facility serving aged and disabled soldiers of the United States military. The evaluation process of the property and individual resources was conducted in five steps:

Development of Character Areas: The findings of the resource survey and the historic context of the campus revealed discernable trends and patterns in the property's character-defining features. These trends were illustrated spatially by dividing the campus into individual "Character Areas" or geographic zones that represent similar visual and historic characteristics. The property's spatial organization, historic development patterns, and terrain features, as well as the existing conditions of the built and natural landscape elements defined the boundaries of the AFRH-W Character Areas.

Categorization of Resources: Each resource was categorized on four levels to better understand its general characteristics and its role at the Home. The levels of categorization are:

- National Register Resource Type;
- National Register Category;
- National Register Resource Subcategory; and
- The original function and/or use of an individual resource.

Initial Assessment of Resources: Each resource was first assessed to determine whether it contributes to the significance of the National Register-eligible AFRH-W Historic District. This initial assessment was based on:

The age of the resource or its existence during the period of significance (1842-1951) defined for the Home; and
Its role within the historic context with respect to the relevant sub-periods and areas of significance identified for the Home.

Resources constructed outside of the period of significance were determined to be "non-contributing" to the Historic District. The initial assessment of resources also required the assignment of each resource to a single Character Area and evaluation within the historic context of that Character Area and the campus.

Quantitative Evaluation of Contributing Resource: Each contributing resource was quantitatively evaluated based on the criteria for evaluation and aspects of integrity as defined by the National Register. Each contributing resource was given a score of 0, 1, 2, or 3 in the following six categories (3 being the highest level of significance or integrity):

- National Register Criterion A (History);
- National Register Criterion B (People);
- National Register Criterion C (Design);
- National Register Criterion D (information potential);
- National Significance; and
- Integrity.

Based on its total score, each contributing resource was assigned a Relative Level of Significance (key, significant, supporting, or minor). All non-contributing resources received a score of zero and have a Relative Level of Significance of "non-contributing."

Evaluation of Character Areas: Based on the quantitative evaluations of the individual resources, each Character Area was then assessed using a similar set of rankings for Relative Level of Significance (key, significant, supporting, minor, and non-contributing). Because the evaluation of the Character Area is based on the collective contribution of its resources to the AFRH-W Historic District, non-contributing resources can be located in contributing Character Areas, and contributing resources can be located in non-contributing Character Areas.

1b. How does your agency quantitatively track its inventory of historic properties?

See below.

1c. What are the sources for this information and how does the inventory discriminate between different types of historic properties?

See below.

1d. How specific and reliable is this information?

See below.

1e. How often is this information reviewed and updated?

See below.

1f. Does your agency have internal procedures to document additions to or losses of historic properties in its inventory?

See below.

1g. What procedures does your agency have in place to identify the location of associated artifacts, records, and remains that have been removed from historic properties?

All of the documentation collected during the 2006-2007 survey and evaluation effort was entered into a computerized database created specifically for AFRH-W called the AFRH-W Resource Inventory/Cultural Resources Management Database (AFRH-W RI/CRM Database). This database contains comprehensive identification and evaluation information for each (contributing and non-contributing) resource including:

- Historic and current names;
- Resource type, classification, and function;
- Relevant dates and sources;
- Construction information (including architects and builders where available);
- Current landmark designation and recommended status within the National Register-eligible AFRH-W Historic District;
- A brief narrative including resource description and summary history;
- Evaluation of the resource;
- Recommendation for the treatment of contributing resources; and
- Images and location maps of the resource.

According to the AFRH-W RI/CRM Database, the current total resource count at AFRH-W is as follows:

- Total Resources: 250
 - Total Contributing Resources: 144
 - Non-Contributing Resources: 106

The database has the capability to produce a variety of reports that allows for up-to-date analysis of the inventory at any point in time, including:

- A tabular report of general information for all 250 resources;
- A tabular report of the evaluations of all 144 contributing resources;
- Individual tabular reports for each of the fourteen Character Areas, listing the resources within that Character Area; and
- Individual resource reports for each of the 250 resources.

As part of its Cultural Resources Management Program (please see response to Question 5), the AFRH-W Cultural Resources Manager (CR Manager) visits the site on a monthly basis (at a minimum) to complete a walk-through of the campus and to determine if there are any changes to the quantity or condition of any of the contributing or non-contributing resources. The CR Manager then updates the AFRH-W RI/CRM Database accordingly. Since the completion of the resource inventory in 2007, no contributing resources have been gained or lost from the campus.

Question 2: How would you characterize the distribution and general condition of these properties?

2a. On a scale of 1 to 10, with 10 representing "excellent" and 1 representing "poor," how would you rate the overall condition of your agency's inventory of historic properties? Give examples that clarify your response.

The conditions of the resources at AFRH-W vary widely and primarily depend on current occupancy and/or use of the individual resource. Two of the resources at AFRH-W, the Administration Building and the Lincoln Cottage, are in excellent condition (10) because of their use in the historic tourism industry under the stewardship of the National Trust for Historic Preservation. Similarly, the resources currently used by AFRH and its staff are well maintained in very good or good condition (6-9). Those buildings that are currently unoccupied vary in condition but are typically in fair or poor condition (2-5). Generally, the landscape sites throughout the campus are in good or excellent condition (6-10), but a majority of the structures that contribute to the designed landscape of the Home (retaining walls, bridges, fences, gates, etc.) are in fair or poor condition (3-5). None of the historic resources (resources dating prior to 1952) at the Home are in very poor condition (1-2) or are in a condition that wholly compromises their historic integrity; therefore, all historic resources at the Home retain sufficient integrity to convey their significance to the history of the AFRH-W Historic District. AFRH is in the process of developing and implementing a program to mothball existing vacant buildings and to repair or stabilize existing structures that are currently in poor or fair condition.

2b. What is the geographical distribution of your agency's historic properties throughout the nation, and does this have an impact on maintenance as well as use? Are there some States or regions that have a particularly high density of properties?

All but one of the 251 historic resources owned and maintained by AFRH are located within the boundaries of the 272-acre campus in Washington, DC. One historic resource owned and managed by AFRH is located at the Gulfport facility. The concentration of historic resources at AFRH-W allows for simplified data collection, management, and protection measures.

2c. What procedures does your agency have for determining the budgetary requirements for the maintenance of historic properties?

In general, there is no established budgetary process for isolating the special maintenance requirements related to the historic significance of a resource managed by AFRH, and no

priority is given to funding ongoing maintenance of historic buildings. Prioritization for maintenance is given based on need, agency mission, and use/occupancy of the resource. During the Master Planning process, AFRH identified historic buildings at AFRH-W that the agency does not plan to employ as part of agency operations and that will not receive maintenance priority. To preserve these resources, AFRH-W CR Manager is working closely with the Chief of Campus Operations (COO) to develop and implement a mothballing program to protect the integrity of these resources until a future use can be identified.

2d. How does your agency evaluate the condition of its historic properties on an ongoing basis? How does your agency calculate the long-term and short-term costs required to maintain and to operate historic properties?

The AFRH-W CR Manager completes a regular walk-through of the campus to determine if there are any changes to the quantity or condition of contributing or non-contributing resources. Changes in condition are reported to the AFRH FPO and CCO, and appropriate treatments or actions to address deterioration are discussed as necessary.

AFRH calculates the long-term and short-term costs required to maintain and operate occupied historic properties as part of the agency's capital budgeting process and operations budget. AFRH does not consider the long-term and short-term maintenance costs for unoccupied buildings as part of the typical capital budgeting process. As mentioned previously, a mothballing program is being developed and implemented for these unoccupied properties as a result of the AFRH-W Master Plan (2008).

2e. Has your agency been able to use facilities or installation master plans as a tool for evaluating the condition of historic properties and determining maintenance needs? If so, please explain.

AFRH has not used facilities and installation plans for evaluating the condition of historic properties or determining their maintenance needs. However, the AFRH-W Master Plan (2008) was a valuable tool for AFRH in determining which historic buildings will continue to be employed by the agency and which buildings will not be occupied or receive regular maintenance by the agency. As a result, AFRH identified several unoccupied buildings for rehabilitation by a third-party developer to ensure their preservation and future maintenance. Until rehabilitation occurs, AFRH will mothball these buildings as part of the previously mentioned mothballing program developed by the CR Manager and CCO.

2f. How does your agency classify its inventory of historic properties that are considered vacant, underutilized, obsolete, or excess to the agency mission needs?

AFRH has two levels of classification for the buildings it manages. Each building is classified as: (1) excess or not excess; and (2) occupied or unoccupied. Currently, there are no excess properties at AFRH-W.

2g. Has your agency entered into any management contracts with other parties to manage your historic properties, including monitoring, repair, stabilization, and rehabilitation? If yes, has this been an effective arrangement, and what are the advantages and disadvantages?

AFRH retains a third-party consultant to serve as the AFRH-W CR Manager to assist the AFRH FPO in fulfilling the agency's stewardship responsibilities. The CR Manager meets the professional qualification standards of the Secretary of the Interior, as codified in 36 CFR 61. Because the AFRH FPO serves a dual role as the agency's Chief Architect, the arrangement with the third-party CR Manager provides the FPO with needed ongoing support for Cultural Resource Management activities. Further, because AFRH is a relatively small agency within the Federal government, the third-party arrangement with a part-time consultant allows AFRH to employ professional historic preservation expertise in an efficient and effective manner.

Third-Party contractors are also often retained to provide repair, maintenance, stabilization, and rehabilitation services for historic resources at AFRH-W. Most contractors are retained on a project basis, and the performance of each contractor varies in terms of quality and efficiency. AFRH is working closely with the CR Manager to determine the best approach to procuring qualified and skilled labor for work to be performed on historic resources. No significant disadvantages have been observed to date.

Question 3: What reporting mechanisms and systems are used by your agency for carrying out its resource management responsibilities?

AFRH has established internal and external reporting mechanisms for carrying out its resource management responsibilities.

INTERNAL REPORTING MECHANISMS:

Reporting of Individual Activities: As required by AFRH-W Historic Preservation Standard Operating Procedure #1 (HP SOP #1, see response to Question 5b of this report), an action proposed by AFRH must go through a series of internal reviews to determine whether it will affect historic resources. To initiate this review, the individual party proposing an action must complete an Historic Preservation Action Request (HPAR). The FPO and CR Manager review the HPAR to determine whether the proposed activity requires cultural resource oversight by consulting a list of exempt activities (the list of exempt activities is included in the AFRH-W HPP). If the activity is exempt, the party proposing the action may proceed without further cultural resources oversight. If the activity is not exempt, the FPO and CR Manager use the information provided by the HPAR to determine whether the proposed action may have a potential adverse effect on an historic resource and/or the AFRH-W Historic District as a whole. If so, the FPO and CR Manager consult with the proposing party to determine whether the adverse effect can be avoided or minimized. The HPAR allows the agency to resolve a majority of adverse effects internally before seeking concurrence from the DCSHPO as part of Section 106 consultation. By July 2010, Cultural Resource Management must be integrated into the agency's Computerized Maintenance Management System (CMMS). Until that time, the HPAR completion and review is done on an individual activity basis through consultation between the CR Manager and the AFRH CCO or between the CR Manager and the AFRH FPO.

Reporting of General Resource Management Activities: The AFRH-W CR Manager completes a monthly report to AFRH of all Cultural Resources Management activities. This report generally includes a summary of activities, a list of documentation relevant to each activity, and recommendations for future activities. This report also documents all activities related to Section 106 consultation with the DCSHPO.

EXTERNAL REPORTING MECHANISMS:

Reporting of Individual Undertakings: As required by HP SOP #1 (see response to Question 5b of this report), a proposed non-exempt activity must be reviewed by the DCSHPO for concurrence with the agency's initial determination of "no potential adverse effect" or "potential adverse effect." As such, the FPO submits an Undertaking Review Request (URR) for review by DCSHPO prior to initiating work on the non-exempt proposed

activity. A URR includes all information necessary for the DCSHPO to determine whether the activity will have an adverse effect.

Reporting of General Resource Management Activities: The AFRH FPO completes an annual Cultural Resources Activities Report for submission to and review by the DCSHPO. AFRH submitted its first annual Report in November 2009. This report ensures that DCSHPO is aware of all CRM activities at AFRH-W and that, through these activities, AFRH is complying with federal preservation laws and regulations.

Question 4: Does your agency coordinate its data gathering for historic properties under its ownership or control with required Federal audit, accounting, and financial management reporting?

4a. Does your agency prepare financial statements in accordance with the CFO Act? If so, does your agency comply with the FASAB's supplemental Federal financial accounting standard No. 8, Supplementary Stewardship Report, which reports on heritage assets?

Yes, the agency prepares financial statements in accordance with the CFO Act. AFRH prepares an annual Performance and Accountability Report (PAR) to Congress to provide important financial and performance information for the agency. The report addresses the stewardship, management, and leadership of the public funds entrusted to the agency. Past AFRH PARs have addressed SSFAS No. 8, "Supplementary Stewardship Reporting." To reflect changes to the FASAB's accounting standards, the AFRH FY2010 PAR will comply with the standards outlined in SSFAS No. 29, which changes the classification of information reported for heritage assets and stewardship land provided by SSFAS No. 8 and serves as a means to incorporate all standards specific to heritage assets and stewardship land into one standard. SSFAS No. 29 reclassifies all heritage assets and stewardship land information as basic except for condition information, which is reclassified as required supplementary information. SSFAS No. 29 also requires that entities reference a note on the balance sheet that discloses information about heritage assets and stewardship land. These requirements include a description of major categories, physical unit information for the end of the reporting period, physical units added and withdrawn during the year, a description of the methods of acquisition and withdrawal, and condition information. This standard also requires additional reporting disclosures about entity stewardship policies and an explanation of how heritage assets and stewardship land relate to the mission of the entity.

4b. If your agency does not prepare financial statements under the CFO Act, what other accounting and financial management procedures are used to document our agency's real property holdings, including historic properties? What are the strengths and deficiencies of these procedures?

Not applicable. AFRH prepares quarterly financial statements under the CFO Act.

- 4c. Within the past five years, has your agency received comments from GAO, Congressional appropriations committees, or the Office of Management and Budget regarding its management of historic properties? What were the major findings and recommendations of such reports, and has the agency taken any specific steps to address the findings?**

No, AFRH has not received any comments from GAO, Congressional appropriations committees, or OMB regarding management of historic properties within the past five years.

Question 5: How is your agency fulfilling its historic preservation program responsibilities under Section 110 of NHPA?

Because the entirety of the 272-acre AFRH-W campus is designated an Historic District in both the National Register of Historic Places (2007) and the District of Columbia Inventory of Historic Sites (2008), AFRH complies with the National Historic Preservation Act of 1966 as amended (NHPA) and its associated regulations, including Section 110. The basic intent of Section 110 of NHPA is to ensure that each agency develops and manages an integrated historic preservation program.

5a. Does your agency have an established historic preservation program to comply with the provisions of Section 110?

In the last five years, AFRH has completed four major activities to ensure compliance with Section 110 of the NHPA: (1) identification, evaluation, and nomination in the National Register of all historic properties at AFRH-W; (2) development and implementation of the AFRH-W Historic Preservation Plan (HPP); (3) development and implementation of the AFRH-G Historic Preservation Plan; and (4) designation of the AFRH FPO.

(1) Designation of AFRH-W: In 2007, AFRH prepared a National Register Nomination Form documenting the entire 272-acre Washington campus as an historic district. This historic district includes 144 contributing buildings, structures, objects, and sites (landscape and archeological). The nomination was based on the findings of an extensive historic context study of the property, as well as the comprehensive identification and evaluation process completed in 2007 (see response to Question 1 of this report). Because AFRH is an agency within the Executive Branch of the Federal Government, the nominating process calls for the direct submission of the nomination to the Keeper of the National Register (Keeper). Consistent with the requirements of the National Register Federal Program Regulations (published as 36 CFR 60), AFRH forwarded the nomination to DCSHPO and the Mayor of the District of Columbia for a 45-day comment period. As there were no comments regarding the nomination, at the end of the 45 days, the AFRH FPO approved the nomination and forwarded it to the Keeper for listing. The Keeper certified that the proposed AFRH-W Historic District nomination met the National Register criteria and listed the property in National Register on December 5, 2007. Further, the AFRH-W Historic District was listed locally in the District of Columbia Inventory of Historic Sites in January 2008.

(2) Development and Implementation of the AFRH-W HPP: In 2007, AFRH adopted the AFRH-W Historic Preservation Plan (AFRH-W HPP) as its guiding document for compliance with Section 106, Section 110, and Section 111 of the NHPA and for the protection of the AFRH-W National Register Historic District. The AFRH-W HPP was prepared in accordance with the NHPA and its associated regulations and guidelines, notably as the "Guidelines for

Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act" (53 FR 4727) and "Protection of Historic Properties" (as amended August 5, 2004; 36 CFR Part 800). As such, the AFRH-W HPP includes an extensive historic context, a comprehensive resource inventory identifying and evaluating all resources located within AFRH-W, and recommendations and implementation methods for maintenance and treatment of those resources. The AFRH-W HPP is enforced under the Programmatic Agreement (PA) relating to the implementation of the approved AFRH-W Master Plan (2008).¹

(3) Development and Implementation of the AFRH-G Historic Preservation Plan: In June 2008, AFRH completed a Preservation Plan for the Chapel at AFRH-Gt, the only historic resource at the Gulfport facility. This Preservation Plan provides direction for the rehabilitation and continued use of the Chapel based on an understanding of the significant features of the building, its past use, a careful assessment of conditions, an understanding of desired future uses, and an understanding of the role the Chapel will play in the future of Gulfport facility.

(4) Designation of the AFRH FPO: In March 2007, AFRH's Chief Operating Officer (COO) appointed AFRH's Chief Architect as AFRH FPO, as required under Section 110(c) of NHPA), and as the Senior Policy Official (SPO), as required under Executive Order 13287, to oversee its historic preservation program and compliance responsibilities for the respective EOs and Federal preservation laws and regulations. The FPO is responsible for ensuring that AFRH is aware of and complies with all Federal responsibilities relating to historic preservation. The FPO serves as the point of contact regarding all policies, procedures, activities, and implementation relating to the AFRH-W Historic District and its contributing resources. The FPO also oversees the implementation of the agency's policy towards its stewardship responsibilities. In addition to the Federal responsibilities, the FPO is responsible for ensuring that the AFRH-W staff is informed and trained in the implementation of the HPP. This includes training the AFRH COO and the AFRH CCO in proper implementation procedures.

5b. Has your agency established internal policies and procedures that adhere to the standards and guidelines outlined in the Section 110 guidelines? How are they disseminated and used by program, regional, and field staff?

AFRH established internal policies and procedures for the protection of the AFRH-W Historic District and its associated historic resources through Chapter 6 of the AFRH-W HPP.

¹ Programmatic Agreement Among the Armed Forces Retirement Home, National Park Service, the National Capital Planning Commission, the Advisory Council on Historic Preservation, and the District of Columbia State Historic Preservation Office Regarding the Armed Forces Retirement Home – Washington, D.C. Master Plan and On-Going Maintenance and Rehabilitation of Historic and Cultural Resources and Development Activities, 2008.

Chapter 6 provides implementation methods that are designed to ensure that AFRH understands and complies with the legal and technical requirements of historic preservation, while making practical decisions that satisfy the mission of the agency.

INTERNAL POLICIES

The AFRH-W HPP establishes internal policies to achieve the goal of managing the AFRH-W Historic District in a manner that will obtain the most efficient and productive use in harmony with the mission of AFRH, while maintaining the historic integrity of the Historic District and its contributing resources. These policies include:

- Managing all uses and activities affecting the AFRH-W Historic District and its contributing resources with full acknowledgement of their historic significance and listing in the National Register;
- Endeavoring to keep contributing resources in productive use by using contributing resources where feasible, and considering new uses for under-utilized resources;
- Identifying the preservation needs and potential effects of proposed undertakings on the AFRH-W Historic District and its contributing resources early in AFRH's decision-making process, prior to budgeting and internal approvals;
- Executing undertakings that affect the AFRH-W Historic District and its contributing resources in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and associated guidelines;
- Avoiding adverse effects to the AFRH-W Historic District and its contributing resources where possible, and when avoidance is not possible, minimizing or mitigating adverse effects;
- Maintaining a record of decisions affecting the AFRH-W Historic District and contributing resources by entering Cultural Resource Management (CRM) actions in the AFRH-W Resource Inventory/Cultural Resource Management Database (AFRH-W RI/CRM Database); and
- Following an established procedure for identifying and processing undertakings that may affect the AFRH-W Historic District and its resources in accordance with the AFRH-W HPP.

The AFRH-W HPP outlines several actions to ensure implementation of these preservation management policies:

- Compliance with Federal preservation laws and regulations;²
- Training of the FPO/SPO and CCO in the proper implementation of historic preservation responsibilities and duties;
- Appointment of a Cultural Resources Manager;³

² AFRH complies with federal preservation laws and regulations through the implementation of the HPP, specifically through the application of the internal policies and procedures that are outlined in the HPP (see below).

- Application of the Secretary of the Interior's Standards for the Treatment of Historic Properties to individual contributing resources of the Historic District in a manner consistent with their relative level of significance:
- Identification and prioritization of real property needs;
- Preparation of formal documentation prior to undertaking substantial or extensive work on key and significant resources;
- Replacement of the current Computerized Maintenance Management Software (CMMS) with a new CMMS that allows easy integration with the AFRH-W Resource Inventory/CRM database;
- Provision of an annual report of activities related to the implementation of the AFRH-W HPP for submission to DCSHPO.⁴

INTERNAL PROCEDURES

The AFRH-W HPP establishes internal procedures for the management of its historic resources through the provision of Historic Preservation Standard Operating Procedures (HP SOP). AFRH ensures the implementation of these procedures through the services of a third-party CR Manager.

Standard Operating Procedures:

For the implementation of the established internal policies for preservation management, the AFRH-W HPP provides HP SOPs for the systematic treatment of its contributing resources, as well as for handling the possibility of disturbance of the archeological sensitive zones. The procedures presented in each HP SOP are based on AFRH's responsibilities as a Federal agency within the Executive Branch and reflect the requirements of Sections 106, 110, and 111 of NHPA. These procedures are coordinated with procedures of the AFRH-W Office of Campus Operations (OCO) that are presently in effect at the Home. AFRH HP SOP #1 relates to Section 106 and is the basic process that is necessary for all undertakings. AFRH HP SOP #1 requires internal review and consultation, as well as external review consultation with all major stakeholders (DCSHPO, NCPC, CFA, and NPS) as appropriate. The remaining HP SOPs provide guidance specific to individual types of undertakings. The AFRH HP SOPs include:

- AFRH HP SOP #1: Section 106 Review for All Undertakings
- AFRH HP SOP #2: Capital Improvement: Adaptive Use
- AFRH HP SOP #3: Capital Improvement: Preservation – Maintenance
- AFRH HP SOP #4: Capital Improvement: Preservation – Repair
- AFRH HP SOP #5: Capital Improvement: Preservation – Restoration
- AFRH HP SOP #6: Capital Improvement: Alteration
- AFRH HP SOP #7: Abandonment/Mothballing
- AFRH HP SOP #8: Disposal: Demolition/Removal

³ AFRH appointed a CR Manager in October 2008. The CR Manager is a qualified preservation professional, as defined by the Secretary of the Interior's Professional Qualification Standards.

⁴ The first annual report to DCSHPO was submitted on November 30, 2009.

- AFRH HP SOP #9: Disposal: Transfer, Negotiated Sale, Donation, or Sale
- AFRH HP SOP #10: Disposal: Ground Lease
- AFRH HP SOP #11: New Construction
- AFRH HP SOP #12: Ground Disturbing Activities and Treatment of Archeological Resources
- AFRH HP SOP #13: Responding to ARPA Violation
- AFRH HP SOP #14: Coordination of NEPA with Cultural Resource Requirements
- AFRH HP SOP #15: Determination of Exemption

Cultural Resources Manager: To assist AFRH in the implementation of the AFRH-W HPP and all stewardship policies and responsibilities, the agency retained a third-party CR Manager in 2008. According to the aforementioned PA, AFRH must retain the services of a CR Manager for the duration of the PA (twenty years), and the CR Manager must be a qualified preservation professional certified under the requirements of 36 CFR 61. The CR Manager works under the supervision of and to assist the AFRH FPO/SPO and CCO with the integration of stewardship policies into the day-to-day operations of the agency, as well as into future development of the campus. The CR Manager's tasks include:

- Advising the FPO in the implementation of the agency's responsibilities under Sections 106, 110, and 11 of the NHPA and other related Federal laws and regulations;
- Advising the FPO on the implementation of the AFRH-W HPP;
- Guiding AFRH in the application of the Secretary of the Interior's Standards for the Treatment of Historic Properties and associated guidelines;
- Assisting the FPO with Cultural Resource Management duties, including maintaining interaction and coordination with the CCO;
- Acting as the liaison between AFRH and major stakeholders, including DCSHPO;
- Performing regular site visits to the AFRH-W Historic District, documenting conditions its individual resources, and updating the AFRH-W RI/CRM Database accordingly;
- Assisting the FPO in the completion of proposals for and implementation of preservation treatment actions affecting contributing resources;
- Assisting the FPO in the appropriate care of surplus or "mothballed" buildings and structures; and
- Assisting the FPO in the review of agency and third-party planning documents that will affect the AFRH-W Historic District and contributing resources.

5c. What procedures does your agency use to evaluate real property to determine whether it is historic? Does your agency have a program in place that plans for the completion of the identification and evaluation of its historic properties?

As described in detail in the response to Question 1 of this report, the identification and evaluation of the historic resources at AFRH-W was completed in 2007, and all resources have been classified as contributing or non-contributing to the AFRH-W Historic District. All

identification and evaluation findings are accessed and managed through the AFRH-W RI/CRM Database, which provides a comprehensive inventory of all resources at the Home. The historic preservation specialists that conducted the identification and evaluation effort employed methodology consistent with that espoused by NHPA and approved by the District of Columbia's Historic Preservation Office. This established assessment methodology is also outlined in the response to Question 1 in this report.

The baseline identification and evaluation was completed in 2007. Resources are re-assessed on an annual basis to determine if their contributing status has changed. In the case that AFRH was to acquire additional resources in the future, the resources would be evaluated based on the established assessment methodology (see response to Question 1 in this report) to ensure that AFRH has a defined and transparent approach to the evaluation of real property. The AFRH-W HPP calls for a full review every five years.

5d. How does your agency consult with stakeholders when complying with Section 110?

The AFRH-W HPP was developed in coordination with the Section 106 Consultation process for the approved AFRH-W Master Plan (2008). As such, all parties identified as major stakeholders who have an interest in the stewardship of historic properties owned and controlled by the Federal Government were included as Consulting Parties for the Section 106 review of the AFRH-W Master Plan (2008) and given the opportunity to review and comment on the draft and final AFRH-W HPP. The internal policies and procedures outlined in the AFRH-W HPP, which were agreed upon by all Signatories of the PA, ensure ongoing involvement of all major stakeholders (DCSHPO, NPS, ACHP, NCPC, and CFA) as appropriate for proposed AFRH undertakings affecting the AFRH-W Historic District. Further, DCSHPO assisted in the identification and evaluation of historic resources through both the listing of the AFRH-W Historic District in the DC Inventory of Historic Sites and through the forwarding of the nomination to the National Register.

5e. How does your agency ensure that the use of historic properties is given priority in carrying out its missions?

The mission of AFRH is to fulfill our nation's commitment to its veterans by providing a premier retirement community with exceptional residential care and extensive support services. The historic resources maintained by AFRH-W are vital to one of the six guiding principles of this mission, which is to honor the heritage of the United States Armed Forces. The buildings, structures, objects, and sites that comprise the AFRH-W Historic District illustrate the institution's efforts to provide innovative care and a comfortable and therapeutic setting for its residents since its establishment in 1852. These historic resources allow the current residents of AFRH-W to connect to the rich history of both of the United States military and the generations of veterans that preceded them.

5f. What challenges does your agency have in meeting its Section 110 responsibilities, taking into account budgetary, management, capital planning, and statutory requirements?

FUNDING: An ongoing challenge faced by AFRH in meeting its Section 110 responsibilities is the source of the agency's funding. AFRH is a financially independent agency and does not receive appropriations from Congress. AFRH is sustained by a permanent trust fund (Trust Fund) that was established in the late nineteenth century. The Trust Fund continues to be fed by active duty enlisted and Warrant Officer monthly payroll deductions, as well as fines and forfeitures from all branches of the military. Although the agency is not able to directly raise funds for its operations, the Trust Fund also benefits from monthly AFRH resident fees, the sale or lease of underutilized land and buildings, gifts and bequeaths, and interest gained on the Trust Fund balance. Because much of the revenue for the Trust Fund comes from military fines and forfeitures, AFRH is also challenged by its need to maintain a sufficient balance to sustain the agency's operations when a drawdown of military forces occurs.

AFRH has confirmed with the National Park Service that 24 U.S.C. §423 indicates that preservation-related activities at AFRH-W are eligible to be included as a line item under the Historic Preservation Fund (HPF).⁵ This section of the U.S. Code addresses the agency's challenge of insufficient funds through the AFRH Trust Fund to maintain and operate the home for the benefit of the residents while also maintaining, repairing, and preserving the agency's historic buildings and grounds. The legislation states that "The Chief Operating Officer and the Director of the Armed Forces Retirement Home – Washington may apply with and accept a direct grant from the Secretary of the Interior...for the purpose of maintaining, repairing, and preserving the historic buildings and grounds of the Armed Forces Retirement Home-Washington included on the National Register of Historic Places."⁶ As of 2008, the entirety of the 272-acre AFRH-W campus is listed in the National Register, making all 144 contributing resources to the AFRH-W Historic District eligible for such a grant. However, AFRH has yet to be able to take advantage of this legislation and is in the process of working with the National Park Service to determine the appropriate way to apply for or access these funds.

AGING INFRASTRUCTURE: As AFRH-W's infrastructure continues to age, rising costs of maintenance and operation of historic buildings drain the Trust Fund and compete with the agency's responsibility to provide services to the Home's veteran residents. Therefore, the agency must choose to mothball many of its historic buildings rather than maintain them as viable facilities for the agency's operations.

⁵ *Preservation of historic buildings and grounds at the Armed Forces Retirement Home - Washington*, U.S. Code 24 (2003), §423.

⁶ *Preservation of historic buildings and grounds at the Armed Forces Retirement Home - Washington*, U.S. Code 24 (2003), §423.

SECURITY: AFRH is also challenged by the need to provide a secure facility for its residents and possibilities for using heritage tourism or economic development to subsidize the cost of maintaining its historic buildings are greatly reduced by this aspect of the agency's mission. As such, many of these buildings remain vacant or underutilized, making their maintenance a particular burden on the agency's Trust Fund.

MISSION: AFRH's mission to provide a premier retirement community for its veteran residents can conflict with the agency's responsibilities to use and maintain its historic buildings. As the character of military action continues to evolve, future residents at AFRH-W will have different medical and accessibility requirements than past and current residents. Therefore, AFRH must modernize its facilities to address the changing needs and challenges of veterans from recent conflicts. AFRH must also provide its residents with facilities designed to reflect the latest standards and practices in senior housing and healthcare. These needs and standards are often difficult to accommodate in historic buildings, making their preservation and maintenance a challenge for the agency.

Question 6: How is your agency complying with Section 111 of NHPA when historic properties are transferred, leased, or sold?

Because the entirety of the 272-acre AFRH-W campus has been designated an Historic District in both the National Register of Historic Places (2007) and the District of Columbia Inventory of Historic Sites (2008), AFRH must comply with the National Historic Preservation Act of 1966 as amended (NHPA) and its associated regulations, including Section 110. The basic intent of Section 111 of NHPA is to authorize Federal agencies to sell, lease, or exchange historic properties that they own or control to non-Federal entities for their mutual benefit and to encourage agencies to take measures that will preserve the historic integrity of properties once they leave Federal ownership.

6a. Has your agency established internal procedures for complying with Section 111 of NHPA? If so, how effective are such procedures and what are the major challenges in implementing this section of NHPA?

See below.

6b. If your agency does not have Section 111 procedures, what are the impediments for using this authority and how can such impediments be resolved?

See below.

6c. Does your agency adhere to any other Federal regulations or authorities in lieu of Section 111 of NHPA when transferring or disposing of its historic properties (e.g. 36 CFR Part 18, Public Building Cooperative Use Act, or regulations developed for use by specific agencies?)

AFRH follows 24 USC §411 in lieu of Section 111 of the NHPA when transferring or disposing of its historic properties. This legislation was developed specifically for AFRH and states that the Secretary of Defense may dispose of any AFRH property by sale, lease, or otherwise, that the Secretary determines is excess to the needs of the agency after a 120-day notification of the proposed disposal to the Committees on Armed Services of the Senate and House of Representatives. The proceeds from such a disposal of real property shall be deposited in the AFRH Trust Fund.⁷

⁷ *Establishment of the Armed Forces Retirement Home*, U.S. Code 24 (2003), §411.

Although AFRH adheres to other Federal regulations in lieu of Section 111 of the NHPA, AFRH has established HP SOPs for disposal of historic properties to ensure that the spirit of Section 111 is addressed in their internal procedures:

- AFRH HP SOP #8: Disposal: Demolition/Removal
- AFRH HP SOP #9: Disposal: Transfer, Negotiated Sale, Donation, or Sale
- AFRH HP SOP #10: Disposal: Ground Lease

6d. When negotiating leases, how does your agency budget for the use of lease proceeds in the rehabilitation and maintenance of historic properties?

In general, AFRH adheres to 24 USC §411 for leasing authority, and lease proceeds are budgeted based on general maintenance and capital priorities of the agency.

Appendix D of the PA (2008) stipulates that the receipt of lease payments for the development of Zone A (as defined in the AFRH-W Master Plan, 2008) triggers specific mitigation actions that benefit the maintenance or preservation of historic resources at AFRH-W. However, these requirements are not related to responsibilities stipulated in Section 111 of the NHPA and were stipulated specifically for the development and ground lease of a defined section of the campus. These requirements are not relevant to proceeds from the lease of AFRH-W buildings located outside of Zone A.

6e. Has your agency been able to establish cooperative management agreements with other parties for the preservation and operation of historic properties?

Lincoln Cottage: AFRH has established an agreement with the National Trust for Historic Preservation (NTHP) for the lease of the Lincoln Cottage and the Administration Building for use as the President Lincoln's Cottage heritage tourism site. A Cooperative Agreement between AFRH and NTHP was executed in 1999. The goal of this agreement was to study, recommend, and pursue ways to implement options to preserve and rehabilitate the Lincoln Cottage for interpretation and public education, which resulted in the development of a Preservation and Management Plan for the rehabilitation and restoration of Lincoln Cottage. Subsequent modifications (2001 and 2004) of this initial agreement have resulted in the restoration of the Lincoln Cottage as a heritage tourism site and the rehabilitation of the Administration Building as a visitor's center. The agreement and modifications protect the historic AFRH-W campus by stipulating controlled public visitation, establishing liability for any damage done to the site during its use by NTHP, and establishing a review process for all work performed on the historic properties by NTHP. Through these agreements, NTHP must comply with all applicable District of Columbia and Federal laws and regulations that

are relevant to AFRH, as well as Department of Defense and U.S. Air Force directives, regulations, and instructions. All work performed by NTHP on these resources must be in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and all plans and specifications are subject to the approval of AFRH. The Cooperative Agreement is in effect for a period of fifty years from the date of approval by AFRH and NTHP (November 3, 1999).

AFRH-W Master Plan Zone A: The PA stipulates a requirement for the developer of Zone A to develop a stabilization and maintenance plan for nine buildings and structures that are to be preserved as part of the AFRH-W Master Plan for Zone A. The rehabilitation and adaptive use of these resources must be completed in accordance with the *Secretary of the Interior's Standards for Rehabilitation* and its associated guidelines and must commence in accordance with a project schedule submitted as part of the project plan for the first non-infrastructure phase of development. AFRH will benefit from this agreement once a developer is chosen to implement Zone A of the Master Plan.

6f. 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?

In general, AFRH adheres to 24 USC §411 for the transfer, lease, or sale of AFRH-managed property.

The AFRH-W Master Plan (2008) identifies historic buildings and structures available for transfer, lease, or sale. Areas for lease and development were identified based on the agency's goal to increase operational and programmatic efficiency by consolidating all current residential operations in the campus core and eliminating duplicative functions that are currently distributed throughout the campus. As a foundation for this evaluation, AFRH developed a Program Assessment Reporting Tool (PART) to identify real property essential to the core mission of AFRH. Because of the unique mission of AFRH, the agency must take into consideration several factors when determining whether a building will be re-used as part of its operations.

Question 7: If your agency does not currently have a historic preservation program or procedures for complying with sections 110 and 111, what future actions will be taken to meet these statutory requirements?

Not applicable. Please see responses to Questions 5 and 6 of this report.

Question 8: What issues regarding your agency's mission, internal policies, location of its inventory of historic properties, or use of such properties could potentially hinder the agency's ability to contribute to community economic development initiatives?

8a. What aspects of your agency's mission could be a challenge to the use or reuse of its historic properties for local economic development initiatives and heritage tourism?

AFRH-W has a unique use as a retirement community for veterans. Therefore, it is difficult for AFRH to achieve a harmonious coexistence of campus operations and outside uses for economic development and heritage tourism. This challenge primarily results from the need to provide a secure, safe, and comfortable facility for its residents, an important aspect of the agency's mission. As a result, many of the buildings on campus remain vacant or underutilized.

8b. What criteria does your agency use to evaluate reuse options for historic properties by either the agency or the local community?

Reuse options for historic properties at AFRH-W were evaluated as part of the AFRH-W Master Plan (2008). As a foundation for this evaluation, AFRH developed a Program Assessment Reporting Tool (PART) to identify real property essential to the core mission of AFRH. Because of the unique mission of AFRH, the agency must take into consideration several factors when determining whether a building will be re-used as part of its operations.

SPECIFIC NEEDS OF VETERANS: One of the agency's guiding principles is to serve the ever-changing needs and preferences of its veteran residents. Many of the historic buildings at AFRH cannot accommodate the types of facilities that are needed to ensure that AFRH remain an innovative and responsive retirement facility. AFRH must address the physical challenges faced by a new generation of veterans, including those eligible veterans from Korea, Vietnam, Afghanistan, and Iraq. In addition, today's military retirees have different expectations than those of a generation ago, and their attitudes about health, mobility, happiness, and family bonds are quite different than retirees from the World War II era.

CODES AND STANDARDS: AFRH must be able to meet specific accessibility, security, and safety standards and codes and strives to respond to current standards for senior housing and healthcare. In accordance with 24 USC §411, the AFRH COO must secure for each AFRH facility accreditation by a nationally recognized civilian accrediting organization. As

such, AFRH has sought accreditation from the Joint Commission on Accreditation of Healthcare Organizations (JCAHO), as well as from the Commission of Accreditation of Rehabilitation Facilities (CARF). These organizations scrutinize the agency's operations to determine where the agency can improve its ability to better serve its residents.

CAMPUS CONSOLIDATION: AFRH must also strive to consolidate operations in the north side of the campus to create a more unified residential community, while maintaining reasonable costs of operations. Therefore, AFRH must seek to eliminate the current spatial separation of medical and residential functions on the campus and the resulting duplicative functions (commons spaces, dining, etc.).

REHABILITATION COSTS: Because of the agency's limited funding, the cost of rehabilitation must be weighed against the benefit of the re-use of a historic building or structure to the agency mission and the care of AFRH residents.

8c. To what extent have security issues or restricted access limited the availability of historic properties for federally funded or public/private economic development or heritage tourism?

See below.

8d. How does the location (i.e., remoteness, inaccessibility, or unique nature of a site) limit your agency's ability to promote local economic development activities?

Because the security and safety of AFRH residents is of primary concern to the agency, restricted access has substantially limited the availability of historic AFRH properties for economic development and heritage tourism. The agency must comply with security standards set by the Department of Defense and must remain within a secured perimeter with restricted visitor access. Therefore, opportunities for economic development, heritage tourism, and promotion of local economic development activities is an ongoing challenge for the agency. The plan for the development of Zone A in the southeast corner of the AFRH-W campus (as defined in the AFRH-W Master Plan, 2008) included several opportunities for public and private economic development, as well as heritage tourism through an educational interpretation program focusing on the history of the agency and the historic campus. However, the development of Zone A to promote economic development and heritage tourism would require moving the site's perimeter fence to the interior of the campus to maintain a secure perimeter around the area that will continue to function as the AFRH-W retirement facility. The moving of the fence is considered an adverse effect that the agency must address through mitigation actions stipulated in the PA.

Further, AFRH-W is challenged by the lack of public transit opportunities for residents and visitors. Currently, AFRH is accessible by a public bus route but is a long distance from

public rail transit relative to many other federal facilities in the District of Columbia. Enhancement of public transit options in the area would benefit AFRH's ability to promote local economic development activities.

Question 9: Does your agency have programs and policies that help it to identify historic preservation opportunities and promote preservation through partnerships?

9a. How has your agency recognized the value of partnerships for the preservation of historic properties? Does your agency seek such partnerships as part of its long-term planning and management of such properties? If so, please explain.

As discussed in the response to Question 6 of this report, AFRH has developed a partnership with the National Trust for Historic Preservation (NTHP) for the restoration, rehabilitation, and operation of the Lincoln Cottage and the Administration Building at AFRH-W. This partnership is defined in a Cooperative Agreement between AFRH and NTHP, as well as a Programmatic Agreement among AFRH, the DC Historic Preservation Office, and NTHP. AFRH has also laid the groundwork for a partnership between the agency and a third-party developer for Zone A of the AFRH-W Master Plan (2008) to allow for the re-use of some of the historic buildings at AFRH-W.

9b. What measures does your agency take 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? If your agency typically uses procedures under the National Environmental Policy Act for such involvement, is there value in using other public participation procedures to foster collaboration among stakeholders?

See below.

9c. What steps if any, has your agency taken to explore the feasibility of privatization and cooperative management for the use or reuse of historic properties to fulfill agency missions?

AFRH sought stakeholder involvement in planning efforts to identify economic development and heritage tourism opportunities during the Section 106 Consultation and NEPA review process for the AFRH-W Master Plan (2008).

9d. Does your agency have internal policies or procedures to facilitate use of historic properties for museums, educational

and cultural facilities, public recreation sites, and heritage tourism destinations? If so, please explain.

AFRH has a partnership with NTHP to manage the Lincoln Cottage and Administration Building as an educational and cultural facility. AFRH has no other internal policies or procedures for this purpose.

9e. How does your agency provide financial assistance to support economic development and heritage tourism projects?

AFRH does not provide financial support of economic development and heritage tourism projects because these functions are not related to the agency's mission.

9f. Are there any statutory or legal restrictions that would preclude the agency from exploring partnerships for local economic development? Please explain.

Any partnership and associated agreements must be consistent with 24 USC §411. As such, all economic development opportunities sought by AFRH must be compatible with the agency mission.

Question 10: How would your agency characterize its overall progress in meeting its property management and stewardship responsibilities since filing its last Executive Order 13287, Section 3, Report?

This report serves as the Executive Order 13287, "Preserve America," Section 3 Baseline Report for AFRH. In accordance with Section 3(c), AFRH will submit its first Section 3 Progress Report by September 30, 2011, consistent with the triennial schedule for Section 3 progress reports for all Federal agencies with real property management responsibilities.

Contact Information

Federal Preservation Officer:

Joseph Woo, Chief Architect
Armed Forces Retirement Home
Washington, DC
202-703-3445
Email: joe.woo@afrh.gov