



PRESERVE AMERICA

ARMED FORCES RETIREMENT HOME

EXECUTIVE ORDER 13287, SECTION 3:
IMPROVING FEDERAL AGENCY PLANNING AND ACCOUNTABILITY

PROGRESS REPORT
2014





**Armed Forces Retirement Home
3700 N. Capitol Street, NW
Washington, DC 20011-8400**

30 September 2014

Chairman Milford Wayne Donaldson
Advisory Council on Historic Preservation
ATTN: Section 3 Progress Report
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Chairman Donaldson:

The Armed Forces Retirement Home – Washington (AFRH-W) is pleased to present the following *Preserve America Section 3 Progress Report for AFRH-W* to the Advisory Council on Historic Preservation (ACHP). This report satisfies progress 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 hard 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 progress in the identification, protection, and use of its historic properties since the submission of the agency’s baseline report in January 2010, and Progress Report in 2011. To ensure that this report satisfies the data collection needs of ACHP, AFRH structured this report using the guidance provided in *Advisory Guidelines Implementing Executive Order 13287, “Preserve America” Section 3: Improving Federal Agency Planning and Accountability*, which was updated by the ACHP in 2014.

If you have any questions about the *Preserve America Section 3 Progress Report for AFRH-W, 2014*, please direct them to our Federal Preservation Officer, Justin Seffens, at Justin.Seffens@afrh.gov.

Sincerely,

Steven G. McManus
Chief Operating Officer

Attachments
As stated



**Armed Forces Retirement Home
3700 N. Capitol Street, NW
Washington, DC 20011-8400**

30 September 2014

Secretary Sally Jewell
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Jewell:

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Introduction

The Armed Forces Retirement Home (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.

AFRH submitted its Preserve America Section 3 Baseline Report to ACHP in January 2010. The 2014 progress report is the agency's second progress report and is submitted on the triennial schedule established in EO 13287.

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 the 2015 report, the following progress report is consistent with the "Advisory Guidelines Implementing Executive Order 13287, 'Preserve America,' Section 3: Reporting Progress on the Identification, Protection, and Use of Federal Historic Properties" (Guidelines), which were updated by ACHP in May 2014. To facilitate consistent data collection by ACHP, the organization of this report is based on questions and associated sub-questions outlined in the Guidelines and is consistent with the approach followed in the 2010 baseline report and 2011 progress report submitted by AFRH.

Background

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. At 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 the campuses 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-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. 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 was 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.¹

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 more than 150 years. The entirety of AFRH-W is listed as a historic district in the National Register of Historic Places (NRHP) and in the District of Columbia Inventory of Historic Sites. The AFRH-W Historic District includes 143 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.

¹ Because there is only one historic resource at AFRH-G, the Chapel, the primary focus of this progress report is on the processes and procedures of AFRH-W, which is the primary historic property of the agency.

IDENTIFICATION AND EVALUATION

Question 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 been improved? Please explain.

- 1a. 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?**

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 by 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. While there is ongoing consultation between the MSHPO and AFRH as to the historic significance of the Chapel, AFRH continues to maintain the Chapel as a historic resource until a final determination is made.

Since the 2010 Section 3 Baseline Report, AFRH has not acquired any additional property at AFRH-G and has not identified any additional historic resources.

AFRH-W

As reported in the Section 3 Baseline Report, AFRH completed a comprehensive resource survey of all objects, buildings, structures, and sites (landscape and archaeology) located within the boundaries of the Washington campus in 2006-2007. The survey team systematically documented each resource regardless of its age of construction, integrity, or association to the property. As part of this effort, AFRH also identified Archeological Sensitivity Zones through a Phase 1a Archeological Investigation, and these zones were included in the comprehensive resource inventory. The survey resulted in the identification of 250 resources, each of which was evaluated for its eligibility for the National Register of Historic Places as a Contributing resource to a historic district. The AFRH-W Historic District was listed in the National Register of Historic Places in 2008 and comprises the entire 272-acre AFRH-W campus. The Historic District is also listed in the District of Columbia Inventory of Historic Sites.

As of 2014, the total number of evaluated resources within the AFRH-W Historic District is 252, with 143 Contributing resources and 109 Non-Contributing Resources. AFRH has identified three additional resources that date from the period of significance of the AFRH-W Historic District and will evaluate these resources to determine whether each is Contributing or Non-Contributing.

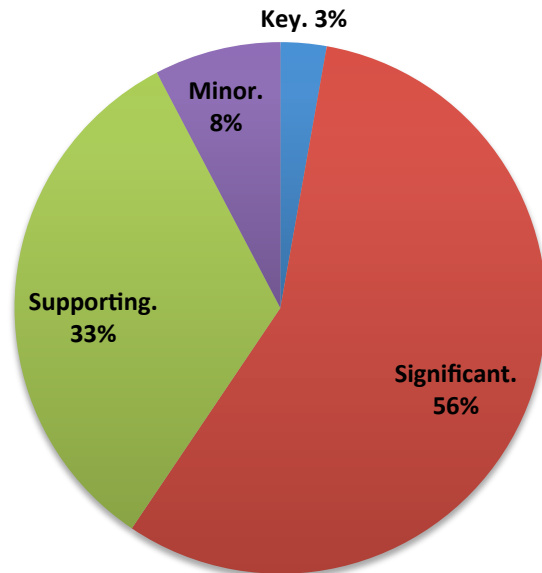
Since the last progress report in FY2011, AFRH lost one Contributing object during a construction accident and demolished one Non-Contributing building. AFRH added two resources, including a Non-Contributing building and Non-Contributing structure.

	FY2009		FY2010		FY2011		FY2014	
	C	NC	C	NC	C	NC	C	NC
Buildings	43	29	43	29	43	29	43	29
Structures	43	39	43	39	43	39	43	40
Objects	16	14	16	15	16	16	15	16
Sites	42	24	42	24	42	24	42	24
TOTAL	144	106	144	108	144	107	143	109

Note: C: Contributing; NC: Non-Contributing

As part of the evaluation of the AFRH-W Historic District in 2006-07, AFRH also completed a secondary evaluation of each Contributing resource to determine its relative level of significance (RLS). AFRH defined four RLS categories: Key, Significant, Supporting, and Minor. Key resources have the highest level of significance within the Historic District.

Relative Level of Significance of Contributing Resources at AFRH-W



Evaluation	Quantity
Key	4
Significant	81
Supporting	47
Minor	11
TOTAL	143

AFRH lost one Significant resource since the last progress report in FY2011. The general distribution of Key, Significant, Minor, and Supporting resources remains the same.

The United States Soldiers' and Airmen's Home National Historic Landmark (NHL) is located within the boundaries of the AFRH-W Historic District and was designated in 1979. Seventeen (17) resources contribute to the NHL, all of which are also listed as Contributing resources to the AFRH-W Historic District. AFRH has not identified any additional Contributing resources within the NHL and has not designated any additional NHLs in the last three years.

	FY2009	FY2010	FY2011	FY2014
National Register Listed (Contributing Resource to the AFRH-W Historic District)	144	144	144	143
National Historic Landmark	17	17	17	17
National Register Eligible	0	0	0	0

1b. 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 survey of historic resources completed in 2006-2007 was comprehensive, and all resources identified during the survey were evaluated for their eligibility for the National Register of Historic Places at that time. AFRH has since discovered three additional resources (three sets of historic howitzers) that have not yet been evaluated for eligibility to the NRHP as Contributing resources to the AFRH-W Historic District.

1c. 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 RSI?

AFRH has identified 64 of its Property, Plant, and Equipment (PPE) as heritage assets, as defined by SSFAS 29, including both Collection and Non-Collection heritage assets. The Non-Collection Heritage assets are composed of those buildings and structures that contribute to the AFRH-W Historic District, as well as the land that comprises AFRH-W. The objects that contribute to the Historic District have been categorized as a single Collection-type heritage asset.

	FY2009	FY2010	FY2011	FY2014
Heritage Assets	64	64	64	64

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

2a. How does the identification of historic properties and heritage assets relate to your agency's mission?

See 2b below.

2b. What is your agency's policy for the stewardship of historic properties and heritage assets?

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 the guiding principles of the agency's

mission. Of the mission's six guiding principles, one is to Honor 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 with the rich history of both the United States military and the generations of veterans that preceded them.

2c. What are the definitions of the major categories your agency uses to classify heritage assets?

AFRH uses the primary heritage asset classifications provided in SSFAS 29: Collection-Type Heritage Assets and Non-Collection-Type Heritage Assets. For Non-Collection-Type Heritage Assets, AFRH identifies buildings, structures, sites, and objects.

Collection-Type Heritage Assets	
Collection of Objects	AFRH-W maintains a collection of objects that are on exhibit throughout the 272-acre campus. Some of these objects represent the institution's connection to the country's military history, while others were created or installed as part of the campus' late-nineteenth-century designed landscape. These objects contribute to the picturesque setting that is enjoyed daily by the Home's residents.

Non-Collection-Type Heritage Assets	
BUILDINGS	The historic buildings at AFRH-W date between 1842 and 1944 and were constructed to support the operation of the institution by housing administrative, agricultural, domestic, religious, medical, recreational, cultural, security-related, and utility-related functions. Four of these buildings are part of the original mid-nineteenth-century development of the institution and comprise the Soldiers' and Airmen's Home National Historic Landmark (NHL), which was designated by the National Park Service in 1977. Although 22 buildings on the campus are currently vacant, a majority of occupied buildings continue to be integral to the operations of the institution. Two of the occupied buildings are leased to the National Trust for Historic Preservation for use as the President Lincoln's Cottage heritage tourism site.
STRUCTURES	The Secretary of the Interior distinguishes "structures" from buildings by defining structures as functional constructions made usually for purposes other than creating human shelter. Structures generally include bridges, tunnels, dams, roads, water towers, gazebos, and bandstands. The structures at AFRH-W date from 1867 to 1914 and relate to the institution's historic agricultural functions (no longer operational), landscape design, circulation system, recreational and cultural activities, and security- and utility-related functions. A majority of these structures continue to be used by AFRH-W for their originally intended purposes, such as the historic masonry and iron wall and fence that provides security for a large part of the campus' perimeter. Some structures related to the institution's historic water management system have been abandoned.

<p>SITES</p>	<p>AFRH-W maintains a 272-acre campus that has been designated in its entirety as a Historic District with national significance in the National Register of Historic Places. Therefore, as a whole, the campus is considered a heritage asset. The campus features both landscape resources and archaeological resources. Since the establishment of the Home in 1852, directed efforts have been made to create both formal and picturesque landscape elements throughout the campus. Many of the historic landscape resources pre-date the establishment of the Home, while others are part of the picturesque landscape design that the Board of Directors implemented throughout the campus in the late nineteenth century. These historic landscape resources create a therapeutic and picturesque setting that has been enjoyed by the Home's residents for more than a century. Other landscape resources extant within the campus are related to the institution's historic agricultural functions (no longer operational) or to the recreational and cultural amenities historically and currently provided to its residents. Historic landscape resources maintained by AFRH within its Washington campus include, but are not limited to: trees, plantings, pedestrian paths, roads, culverts, channels, ponds and lakes, a golf course, a natural spring, meadows, pastures, perimeter plantings, and retaining walls. The campus also contains several archaeological resources within the campus that have been identified to have potential to yield information through the discovery of historic and prehistoric remains.</p>
<p>OBJECTS</p>	<p>The Scott Statue is the only object within the campus that is a permanent fixture and is not part of a general collection of objects. The statue was installed in 1873 to honor General Winfield Scott, the institution's founding benefactor.</p>

2d. How does your agency define real property?

AFRH defines real property as all assets classified as land, buildings, and structures. This definition is consistent with the Federal Real Property Council's classification of real property. As a federal agency, AFRH also adopts the definition of Federal Real Property, as stated in Executive Order 13327 of February 4, 2004: "Any real property owned, leased, or otherwise managed by the Federal Government, both within and outside the United States, and improvements on Federal lands." AFRH also recognizes all Federal real property exclusions defined in EO 13327.

2e. Describe your agency's policy on the evaluation and nomination of historic properties to the National Register of Historic Places as required by Section 110 of the National Historic Preservation Act. How has your agency maintained a Section 110 program in light of limited agency budgets?

Evaluation and nomination of historic properties to the National Register of Historic Places (NRHP) is part of the AFRH-W Historic Preservation Plan (HPP). The HPP establishes Implementation Actions for the purpose of achieving "the goal of protecting the historic integrity of the Historic District and its contributing resources, while obtaining the most efficient and productive use in support of the mission of AFRH." Implementation Action 'B' of the HPP states that the entirety of the campus will be nominated to the National Register of Historic Places. The nomination was completed in 2007, and the entirety of AFRH-W was listed in the NRHP as the AFRH-W Historic District in 2008. Since the requirement to nominate the entirety of the campus to the National Register was completed and successful, AFRH has not yet needed additional funding for evaluation and nomination purposes.

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

The entirety of the AFRH-W campus has been nominated to and listed in the National Register of Historic Places as the AFRH-W Historic District (AFRH-W). Individual resources within the historic district are re-assessed on an annual basis to determine if their contributing status has changed. In the case that AFRH acquires additional resources in the future, the resources will be evaluated based on the agency's established assessment. The AFRH-W HPP calls for a full review every five years..

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

All identification and evaluation findings are accessed and managed through the AFRH-W Resource Inventory and Cultural Resources Management Database (RI/CRM Database), which provides a comprehensive inventory of all resources, Contributing and Non-Contributing, within the AFRH-W Historic District. Any changes to the number or evaluation of resources are recorded in the RI/CRM Database for internal coordination and reporting purposes.

Over recent years, AFRH has been and still is considering an improved software platform for the RI/CRM database. One of the primary improvements AFRH seeks is a database that is web-based, accessible remotely, integrated with other asset management and maintenance systems, and integrated with Geographic Information Systems (GIS) data.

The AFRH FPO also completes an annual Cultural Resources Activities Report for submission to and review by the DCSHPO. This report ensures that DCSHPO is aware of all CRM activities at AFRH-W, including identification and evaluation of historic properties. The consulting CR Manager also provides the FPO with summary reports of CRM activities monthly or as necessary.

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

5a. 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?

See 5b below.

5b. How have partnerships benefited your agency?

AFRH has not employed the use of partnerships to assist in this effort. AFRH completed an internal identification and evaluation of historic resources, resulting in a comprehensive resource survey and the designation of the AFRH-W Historic District in 2008. The same internal process will be used for any future identification and evaluation of historic properties.

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

The AFRH historic resources inventory is comprehensive and includes all resource types defined by the National Park Service: buildings, structures, objects, sites, and districts. AFRH is responsible for the preservation of all Contributing resources, regardless of resource type, and the agency has been challenged by how to convey the operational and financial impacts of that responsibility in its various federal reporting requirements. The primary challenge is the translation of the full inventory of protected historic resources at AFRH-W into other federal property classifications, particularly those classifications related to SSFAS 29 and EO 13327. AFRH has found it most cumbersome to adapt these classifications to its discrete landscape resources and the numerous objects of military memorabilia that are found throughout the campus. AFRH has tried to address this issue by classifying the entire property as a heritage asset to cover the landscape resources. AFRH has also grouped many objects into a single Collection-Type heritage asset.

Despite this ongoing challenge, AFRH made great strides in 2013 to manage, document, and exhibit a portion of the agency's Collection-Type heritage assets at AFRH-W. The new Scott Building, completed and occupied in 2013, includes a Hall of Honors that is a permanent museum-like display of artifacts and images that illustrate the history of the campus.

In 2014, AFRH undertook an internal survey of ordnance at AFRH-W that is not inventoried, mounted, or displayed, adding important documentation and information on the agency's collection-type heritage assets.

PROTECTION

Question 7: Explain how your agency has protected historic properties.

7a-b. How has your agency protected, stabilized, rehabilitated, or monitored historic properties?

An Award-Winning Response to the 2011 Earthquake

The 5.8 magnitude earthquake that struck the United States mid-Atlantic region on August 23, 2011 caused major damage to the Sherman Building (Sherman South – Building 14, Sherman Annex – Building 15, Sherman North – Building 16) as well as the chimneys of Quarters 1 and 2 at AFRH-W. During the disaster, approximately 200 stones fell from the clock tower, parapets, gable ends, and chimneys of the Sherman Building. Falling stones crashed through the roof and floors of the Sherman Building, and the earthquake's lateral forces caused significant structural damage, most extensively in Sherman Annex.

During emergency response efforts in the weeks following the earthquake, AFRH's CR Manager coordinated with contractors as an additional 182 loose stones were removed from the building, and ten custom bands were strapped around the tower for intermediate stabilization. For the full scope of repairs for the recovery effort, AFRH received \$14.6 million in additional federal funding.

AFRH awarded the repair of the building to a design-build team in July 2012. Over ten months, over 3,000 exterior stones were reconstructed on the Sherman Building as structural, plaster, ornamental, and roof repairs were completed. A custom structural steel frame was constructed within the previously unreinforced clock tower; over 20 courses of marble were deconstructed and reconstructed to accommodate the frame. The extensive deconstruction of the clock tower not only allowed for a long-term repair of the building, but also taught contractors and the agency more about the original construction methods and practices. An 1890 time capsule was discovered within a void in the southwest corner of the tower, adding detail and life to the construction history. AFRH replaced the time capsule along with one of its own during reconstruction to contribute to the story of the Sherman Building.

The Sherman Earthquake Recovery project also drew outside attention, from the community and the media, to the rich history at AFRH-W and the value in restoring and preserving the agency's iconic buildings. AFRH and its contractors took advantage of the opportunity to engage with community and interest groups, hosting: District of Columbia Public Schools' (DCPS) "Live it Learn it" program for a hands-on education program; information sessions and tours through the District of Columbia Preservation League (DCPL), and the local chapter of the Association for Preservation Technology (APT-DC); and the general public during an open house in August 2013.

In recognition of the exemplary efforts by AFRH and the design-build team in the recovery of this important historic resource, AFRH received the State Historic Preservation Officer's Award, District of Columbia's Awards for Excellence in Preservation (May 2014).

General Protection

In 2007, AFRH adopted the AFRH-W Historic Preservation Plan (HPP) as its guiding document for compliance with the NHPA and for the protection of the AFRH-W Historic District. The HPP establishes policies, actions, and procedures that ensure that preservation is integrated into the agency's daily operations.

The AFRH-W HPP outlines several actions to ensure implementation of the HPP and protection of historic resources at AFRH-W.

PROTECTION ACTIONS
1. Compliance with Federal preservation laws and regulations; ¹
2. Training of the FPO/SPO and CCO in the proper implementation of historic preservation responsibilities and duties;
3. Appointment of a Cultural Resources Manager; ¹
4. 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;
5. Identification and prioritization of real property needs;
6. Preparation of formal documentation prior to undertaking substantial or extensive work on key and significant resources;
7. 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;
8. Provision of an annual report of activities related to the implementation of the AFRH-W HPP for submission to DCSHPO. ¹

Stabilized and Rehabilitated

Since the 2011 progress report, AFRH has undertaken extensive efforts to maintain, rehabilitate, and restore its historic properties. The HPP SOP #3, "Maintenance," is now supplemented by the Historic Preservation Maintenance Program (HPMP), which outlines routine monitoring and maintenance of historic property.

As of FY2014, AFRH is prioritizing the leasing of vacant space within historic buildings, an objective in the 2008 AFRH-W Master Plan. Redevelopment and reuse of historic properties and the associated rehabilitation efforts will be mutually beneficial to AFRH and to the AFRH-W Historic District.

AFRH has undertaken several additional undertakings and planned projects in efforts to pair campus improvements with preservation since the 2011 progress report. Some select projects include:

- Realignment of the the main quadrangle connection between the Sherman Building and the new Scott Building, restoring the historic north-south axis that is significant to the historic development of the campus.
- The addition of a new walking trail, Quarters Woods Path, which was cleared and restored between Quarters Row and Rock Creek Church Road. This landscape effort reopened a historic pedestrian route while encouraging outdoor activity and resident health.
- AFRH-W, in partnership with NTHP, replaced the non-original asphalt roof on the Administration Building (Building 10), with historically-accurate green tile, improving overall compatibility with the AFRH-W Historic District. This building is occupied and maintained by the NTHP.

Since the agency baseline report in 2010, AFRH has undertaken numerous improvement and repair projects to stabilize and rehabilitate Contributing resources to the AFRH-W Historic District.

Previous projects repaired and replaced roofs, provided preventative maintenance and mothballing of vacant buildings, and stabilized the deteriorated Forwood Building clock tower.

Monitored

AFRH monitors its historic resource through the implementation of the agency’s standard operating procedures (SOPs), specifically those stipulated in the AFRH-W Historic Preservation Maintenance Program (HPMP). Monitoring is completed by both facilities management contractors and the CR Manager. The HPMP provides consistent guidelines for maintenance and monitoring, allowing coordination of data gathered from multiple sources.

<p>HPMP SOP #3H Daily Monitoring</p>	<p>The regularly assigned duties of agency staff in the AFRH Office of Campus Operations (OCO) include daily monitoring of all buildings on campus. Based on observed conditions, the OCO staff reports maintenance needs immediately through the Computerized Maintenance Management System (CMMS), along with any maintenance requests made by residents and other agency staff. Any maintenance requests that affect historic resources are flagged and reviewed by the FPO prior to being implemented.</p>
<p>HPMP SOP #3D Monthly Monitoring</p>	<p>AFRH monitors the exterior conditions of all historic resources on a monthly basis and monitors interiors as necessary. Monthly monitoring is part of the duties assigned to the third-party Cultural Resources Manager (CR Manager). The CR Manager completes monthly site visits and documents any observed conditions that require further monitoring or immediate attention. The CR Manager reports any noted conditions to the FPO immediately and assists the FPO in the development of treatment scopes as necessary.</p>
<p>HPMP SOP #3A/3B Annual Monitoring</p>	<p>As part of the implementation of the HPMP, AFRH initiated an annual and biannual assessment schedule of all Contributing buildings, structures, and objects in 2012. Frequency is determined by the level of significance of each resource. These assessments are more comprehensive than the daily and monthly assessments and are intended to identify deteriorated conditions of exterior building features and materials prior to their becoming severe or catastrophic. The scope of the assessment (exterior and/or interior) is determined by a prioritization system based on the Relative Level of Significance (RLS) of individual resources, as defined in the HPP. Only resources identified as having an RLS of “Key” receive annual interior assessments. The exterior and interior assessments result in the recordation of the use of the resource, noted conditions of specific building components, and recommendations for maintenance based on noted conditions. In addition to the identification of immediate maintenance needs, the written and photographic documentation accommodates an annual comparison and monitoring of conditions.</p>

Maintained

Historic Preservation Maintenance Program (HPMP)

Per the Historic Preservation Plan (HPP) for AFRH-W, completed in 2007, AFRH completed a comprehensive HPMP for the contributing built resources at the AFRH-W campus. The HPMP provides the foundation for a proactive maintenance program, which was launched in FY2012. In

addition to the monitoring activities discussed above, this program outlines SOPs for cyclical maintenance activities, emergency maintenance activities, and daily maintenance activities.

Capital Improvement Plan (FY2011-21) and Master Landscape Plan (2012)

In FY2011 AFRH drafted a ten-year Capital Improvement Plan (CIP) for both the AFRH-G and AFRH-W campuses. The CIP captures all anticipated capital improvements through FY2021, and proposes each project as part of a broader agency program or goal. Historic Preservation and Stabilization is one of five agency programs that will be supported and implemented through these capital improvements, and accounts for 9 (21%) of the 43 projects proposed for AFRH-W. In addition to the proposed capital improvements specifically for protection, stabilization, and rehabilitation of historic properties, the AFRH CR Manager reviewed all projects for consistency with historic preservation goals and compliance with relevant historic preservation regulations.

The CR Manager participated in all phases of the preparation of the CIP and was engaged throughout the planning and drafting processes. In assistance to the FPO, the CR Manager's scope of consulting activities specifies partial drafting and complete review of the CIP. Thus the stewardship of historic properties is an integral part of the ten-year plan as it was created and is updated.

Question 8: Describe the programs and procedures your agency has established to ensure the protection of historic properties including compliance with Sections 106, 110, and 111 of the NHPA:

8a. How does your agency oversee compliance with Sections 106, 110, and 111 of NHPA?

See 8b below.

8b. Has your agency dedicated adequate resources to oversee these provisions?

FPO

The AFRH Federal Preservation Officer (FPO) oversees the implementation of the HPP. In February 2011, AFRH's Chief Operating Officer (COO) appointed AFRH's Chief of Campus Operations (CCO) as the FPO, as required under Section 110(c) of NHPA. The COO also appointed the CCO as the Senior Policy Official (SPO), as required under Executive Order 13287. 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.

Cultural Resources Manager

To assist the FPO in the implementation of the AFRH-W HPP and all stewardship policies and responsibilities, the agency retains a third-party Cultural Resources Manager (CR Manager). Under the Terms of the 2008 Programmatic Agreement (PA), AFRH must retain the services of a CR Manager for the duration of its Programmatic Agreement (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 the FPO and assists the FPO with the integration of stewardship policies into the day-to-day operations of the agency.

8c. Does your agency use program alternatives such as Programmatic Agreements, Program Comments, and other tools to tailor the Section 106 process to your agency's programs and activities? If so, how effective are these alternatives in meeting their intended goals? If not, are there specific activities or programs that you believe would benefit from treatment under a program alternative?

AFRH-W follows a PA that was executed as a result of the AFRH-W Master Plan (2008). The Master Plan was subject to preservation and environmental review processes consistent with the requirements of NHPA Section 106 and NEPA.² The purpose of the PA is "to mitigate adverse effects anticipated from the mixed-use development outlined in the Master Plan and to ensure compliance with Sections 106 and 110 of the [NHPA]...and its implementing regulations."

The PA sets forth tailored Section 106 procedures for AFRH undertakings. If proposed undertakings are consistent with the Master Plan, AFRH can consult directly with the District of Columbia State Historic Preservation Office (DCSHPO) without initiating a full consultation process with other stakeholders. If the undertaking is not consistent with the Master Plan, a Master Plan amendment is required, and a typical Section 106 consultation is initiated for the review of that amendment. This distinction encourages the agency to comply with the Master Plan, ensuring the relevancy and longevity of that document. Additionally, the simplification of the review process for those undertakings that are consistent with the Master Plan makes compliance with Section 106 more manageable for the agency. In general, the tailoring of preservation review procedures for the agency has resulted in a more effective, efficient, and thorough preservation program at AFRH-W.

The PA also provides for a hybrid process that combines Section 106 review with other federal design reviews that are required for federal projects in the National Capital Region, namely reviews through the National Capital Planning Commission (NCPC) and the Commission of Fine Arts (CFA). The combination of preservation review and design review is often a very cumbersome and sometimes onerous process for agencies, and the hybrid approach developed for AFRH makes the process more defined and manageable.

Built within the Section 106 procedures in the PA is a defined process for internal resolution of potential adverse effects prior to consultation with DCSHPO, helping to expedite DCSHPO concurrence. The inclusion of this process ensures that even minor repair and maintenance work at AFRH-W undergoes some level of preservation review. Internal review is the responsibility of the FPO and CR Manager, and engaging agency staff and consultants in the preservation review process allows preservation to be carried through all stages of a project, including planning, design, procurement, and implementation. This system also helps to avoid the perception of preservation as only an external requirement rather than an internal responsibility.

Overall, the streamlining of preservation reviews and the internalization of the resolution of effects through the PA has facilitated the integration of preservation into the agency's planning and operations.

² "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."

8d. Does staff in your agency have access to training on Section 106, 110, and 111? If not, what are the impediments to accessing or participating in training?

The FPO is responsible for ensuring that the AFRH-W staff is informed and trained in the PA and the requirements for the implementation of the HPP, the documents that guide the agency's compliance with Sections 106, 110, and 111. It is part of the regularly assigned duties of the CR Manager to conduct annual training sessions to assist the FPO with this responsibility.

As stipulated in the HPP, the FPO is required to complete the appropriate training regarding Section 110 as offered by ACHP within one year of appointment. Since appointment of the FPO, ACHP has not offered Section 110 training.

The cost of Section 106 training, as offered by ACHP, has been an impediment to participation by the agency; to date, AFRH has relied on the assistance of the CR Manager for training purposes and to review agency activities for compliance with Section 106.

8e. Is your agency considering procedures and policy related to compliance with Sections 106, 110, and 111 of NHPA when evaluating regulatory review under Executive Order 13563, "Improving Regulation and Regulatory Review?"

Proposing and adopting regulations does not relate to the mission of AFRH, and EO 13563 is not as relevant to AFRH as an agency. The only example of this would be the agency's development and adoption the "Compliance with the National Environmental Policy Act" regulations (38 CFR Part 200), which establish policies and responsibilities for implementing the *National Environmental Policy Act* of 1969, related laws, executive orders, and regulations in the decision-making process of AFRH. These regulations consider and explicitly incorporate the agency's responsibilities related to compliance with NHPA.

Question 9: Describe your agency policies that promote and/or influence the protection of historic properties.

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.

PROTECTION POLICIES
1. 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;
2. Endeavoring to keep contributing resources in productive use by using contributing resources where feasible, and considering new uses for under-utilized resources;
3. 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;

4. Executing undertakings that affect the AFRH-W Historic District and its contributing resources in accordance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and associated guidelines;
5. 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;
6. 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
7. 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.

For the implementation of the established internal protection policies, the AFRH-W HPP provides Standard Operating Procedures (SOPs) for the systematic treatment of its Contributing resources, as well as for handling the possibility of disturbance of potential archaeological sites. The procedures presented in each 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. The SOPs address a range of undertakings that could affect historic resources within the AFRH-W Historic District.

STANDARD OPERATING PROCEDURES	
SOP 1	Section 106 Review for All Undertakings
SOP 2	Capital Improvement: Adaptive Use
SOP 3	Capital Improvement: Preservation – Maintenance
SOP 4	Capital Improvement: Preservation – Repair
SOP 5	Capital Improvement: Preservation – Restoration
SOP 6	Capital Improvement: Alteration
SOP 7	Abandonment/Mothballing
SOP 8	Disposal: Demolition/Removal
SOP 9	Disposal: Transfer, Negotiated Sale, Donation, or Sale
SOP 10	Disposal: Ground Lease
SOP 11	New Construction
SOP 12	Ground Disturbing Activities and Treatment of Archeological Resources
SOP 13	Responding to ARPA Violation
SOP 14	Coordination of NEPA with Cultural Resource Requirements
SOP 15	Determination of Exemption

9a. How is this policy incorporated into your agency's strategic plan?

In 2011, AFRH released a four year Strategic Plan for FY2011-2015. The Strategic Plan incorporates the agency's preservation policies and procedures by adopting the 10-year Capital Improvement Plan (CIP). As described in the response to Question 7b in this report, Historic Preservation and Stabilization is one of five agency programs that will be supported and implemented through the capital improvement projects proposed in the CIP and accounts for 9 (21%) of the 43 projects proposed for AFRH-W³. In addition to the proposed capital improvements specifically for protection, stabilization, and rehabilitation of historic properties, the CR Manager reviewed all projects for consistency with relevant historic preservation regulations, as well as agency-specific preservation procedures and policies.

9b. Does your agency have an asset management plan? If not, why? If yes, what planning and management requirement do historic real properties have in your agency's asset management plan?

In 2005, AFRH initiated strategic portfolio planning to determine how best to utilize its assets. AFRH prepared a real estate strategy, which included the following elements:

1. Identify campus facilities that should remain in AFRH use and those that might be developed by others to generate revenue for AFRH;
2. Outline a range of roles for AFRH's participation in the project and select the preferred role;
3. Outline development options and test their environmental and financial impacts to determine a feasible program of uses that is compatible with AFRH's mission;
4. Outline alternative strategies for the parcelization of the site that could be developed by others and potential phasing of development; and
5. Enumerate costs, benefits and risks to AFRH for each development strategy;
6. Identify tactics to implement the strategy, including staffing, marketing strategies, developer selection to enhance the ability of AFRH to perform its mission and maximize its assets.

As a result of the planning, AFRH decided to consolidate its operations on the north campus and construct a new facility there. AFRH also completed environmental and historic studies and completed a master plan to guide development. AFRH attempted to enter into a ground lease with a developer for 77 acres at the southeast portion of the campus, designated by the 2008 Master Plan as Zone A. The PA was a direct result of this planning process and helped AFRH to develop tools to manage its historic assets more effectively. Designation of the entire AFRH-W also was a result of this planning process.

Because of economic shifts since the development and approval of the Master Plan, the United States Army Corps of Engineers reevaluated the asset management database for AFRH-W, specifically the strategy for disposal for Zone A. Regardless of possible changes to this strategy, the site plan for Zone A and the plan for existing historic buildings will remain consistent with the approved Master Plan.

³ While eight (8) of the projects are specifically included in the "Preservation and Stabilization" section of the plan, the project to rehabilitate the historic lakes at the southwest corner of the campus is also beneficial to an important historic resource, bringing the total to nine (9).

With developments in planning related to the agency's SSPP and additional Executive Orders, AFRH now has additional information specific to its real property. AFRH has retained contractors with expertise in real property, historic preservation, and sustainability to ensure accuracy of existing real property data and compile updated metrics for future asset management at AFRH-W.

9c. 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?

AFRH retains a third-party consultant to serve as the 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 of Campus Operations, the third-party arrangement 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-by-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.

AFRH also retains a third-party maintenance contractor to perform all maintenance activities on the campus. Because the maintenance contract must be re-bid every few years, there is a high risk of contractor turnover, which is a disadvantage of the third-party arrangement relative to the agency's preservation program. Much of the agency's compliance with Section 106 and 110 is dependent on appropriate planning and implementation of maintenance activities. This includes integration of cultural resources data and functions into the Computerized Maintenance Management Software used by the maintenance contractor, as well as training of maintenance staff on appropriate procedures. Contractor turnover creates a disruption in the implementation of preservation maintenance procedures, particularly if new maintenance software is introduced as a part of a new contract.

9d. What types of performance criteria must be met in the stewardship and capital planning for the use of historic properties?

Performance criteria for the stewardship and capital planning for the use of historic properties are included in three different documents: the AFRH-W Master Plan, the AFRH Strategic Plan, and the AFRH Capital Improvements Plan (CIP).

The AFRH-W Master Plan includes both planning considerations and design guidelines that protect the AFRH-W Historic District and its individual historic resources. All new construction and rehabilitation projects must be consistent with these guidelines.

The AFRH Strategic Plan sets forth seven discrete Strategic Goals and associated objectives. All stewardship and capital planning for historic resources at AFRH-W must be consistent with and in furtherance of these goals and objectives.

Finally, the CIP sets forth "Improvement Imperatives" to guide all capital improvements projects, including those projects involving historic resources. These imperatives provide rules related to finances, sustainability, regulatory compliance, and resident care.

9e. Does your agency utilize a deferred maintenance program for protection of historic properties?

AFRH uses the AFRH Capital Improvements Plan (CIP) and AFRH-W Historic Preservation Maintenance Plan (HPMP) to guide the maintenance of historic properties at AFRH-W.

Question 10: Explain how your agency has employed the use of partnerships to assist in the protection of historic properties.

10a. Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the protection of historic properties?

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

AFRH-W has a unique use as a retirement community for veterans. When it enters into partnerships, AFRH must achieve a harmonious coexistence of campus operations and outside uses for economic development and heritage tourism so that it can continue to provide a secure, safe, and comfortable facility for its residents. This goal was achieved in a significant partnership with the National Trust for Historic Preservation. AFRH and the Trust have entered into an agreement whereby the Trust renovated the historic Lincoln Cottage and the adjacent Administration Building to serve as a visitor's center for the Cottage.

The AFRH-W Master Plan, which will guide future development of the Washington campus, envisions significant partnerships with the private sector to generate revenue for the ongoing operations of the retirement community, including the protection and use of historic assets. The Master Plan includes guidelines that will ensure the security for the residents while allowing for development by others. Further, private developers will be required to rehabilitate and adaptively use historic assets within the development area.

10b. How have partnerships benefited your agency?

See 10c below.

10c. How successful has your agency been in developing partnership agreements (e.g. cooperative, cost-share, interagency, research) for the protection of historic properties?

LINCOLN COTTAGE

AFRH has established a partnership 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 as part of this partnership. 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).

ZONE A DEVELOPMENT

As part of the 2008 AFRH-W Master Plan, a 77-acre section of the Washington Campus would be redeveloped by a third-party developer to create an opportunity for additional income to the AFRH Trust Fund. 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 within 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.

OTHER

AFRH is continuously looking into opportunities to lease historic buildings to developers who are capable of rehabilitating agency buildings for reuse. Properties under consideration for reuse include the Heating Plant (Building 46), the Grant Building (Building 18), the old Security Building (Building 22), and vacant portions of Sherman Annex and North (Buildings 15 and 16).

Question 11: Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in protecting historic properties over the past three years.

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).⁴ This section of the U.S. Code addresses the agency's challenge of insufficient funds through the AFRH Trust Fund to maintain and operate AFRH-W 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."⁵ As of 2008, the entirety of the 272-acre AFRH-W campus is listed in the National Register, making all 143 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.

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.

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.

In October 2013 AFRH decommissioned the Heating Plant, and implemented a more sustainable and cost-effective strategy to serve the needs of each operational building. This is one step of many that will be taken; the CIP and MLP include plans for additional improvements involving storm water management and solar power solutions. When funds become available, AFRH will prioritize the update of systems to replace aging infrastructure.

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.

See answer to 14f for additional campus security challenges, successes, and opportunities.

⁴ *Preservation of historic buildings and grounds at the Armed Forces Retirement Home - Washington*, U.S. Code 24 (2003), §423.

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

USE

Question 12: Explain how your agency has used historic properties.

12a. What is the total number of your agency's historic properties with an assigned mission and/or purpose?

Of the 64 buildings and structures at AFRH-W, 42 (66%) are in use by the agency or leased by the agency to tenants. The remaining 22 are vacant or not in use.

12b. In what ways has your agency used technologies and/or media including the Internet, to promote heritage tourism as a use of historic properties?

AFRH does not currently use technology and/or media to promote heritage tourism at AFRH-W. Heritage tourism is not part of the agency's mission. The National Trust for Historic Preservation, the non-profit organization that manages the Lincoln Cottage, maintains a website for the President Lincoln's Cottage heritage tourism site.

12c. 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?

See the answer to Question 10c.

12d. Explain how your agency has, to the maximum extent feasible, used historic properties within its real property inventory in accordance with Executive Order No. 13006, "Locating Federal Facilities on Historic Properties in our Nation's Central Cities" (1996).

Reuse options for historic properties at AFRH-W were evaluated as part of the AFRH-W Master Plan. 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 remains 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 evaluate 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. This challenge encourages AFRH to pursue partnerships with private developers in Zone A and elsewhere, such as the Grant Building (Building 18) and the Heating Plant (Building 46), to explore options for rehabilitation and reuse.

Question 13: Explain the overall condition of the historic properties within your agency's control.

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 because of their use in the historic tourism industry under the stewardship of the National Trust for Historic Preservation. AFRH put the supplemental funding received for the earthquake disaster recovery to excellent use, rehabilitating the Sherman Building and returning it to excellent condition. Other resources currently used by AFRH are well maintained and in very good or good condition. Those buildings that are currently unoccupied vary in condition but are typically in fair or poor condition.

Generally, the landscape sites throughout the campus are in good or excellent condition, 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. None of the historic resources (resources dating prior to 1952) at the Home are in very poor condition 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.

13a. What efforts has your agency undertaken to improve the condition of historic properties?

See response to Question 7b.

13b. Discuss how the condition of your historic properties affects your agency's ability to use them in support of its mission?

As stated in Question 12d, the agency has limited funds and must weigh the cost of rehabilitation against the benefit of the re-use of a historic building or structure to the agency mission and the care of AFRH residents. Those historic buildings that are in poor condition or require extensive ongoing maintenance are not considered viable for agency use.

Question 14: Describe your agency policies that promote and/or influence the use of its historic properties.

Throughout the history of AFRH-W, the agency's mission and operations have changed based on the evolving needs of veterans, advancements in medicine and healthcare, and changes in the philosophy of senior care. Once occupying numerous individual buildings spread throughout hundreds of acres, the agency has slowly condensed its operations to a smaller area of the campus. The most drastic change took place in the 1950s and 1960s when AFRH constructed two large buildings to condense much of the agency's residential and administrative functions. This move led to the vacancy of many of the smaller historic buildings throughout the campus that once housed various aspects of the agency's operations.

With vacancy as one of the primary threats to historic buildings, AFRH tries to find tenants for its stock of historic buildings that are currently not in direct use by the agency. AFRH has successfully leased buildings and spaces to individuals, government entities, schools, and non-profit organizations. This action has been crucial to the protection of these buildings by maintaining their viability.

As part of the agency's Capital Improvement Plan (CIP), developed in 2011 and updated in 2012, AFRH included several projects that involved the rehabilitation of existing vacant buildings for new uses. The CIP also sets forth a general policy to find viable uses for vacant historic buildings on campus.

14a. Have you incorporated these policies into your agency's strategic plan?

Please refer to the response to Question 9a of this report.

14b. Does your agency have an asset management plan? If not, why? If yes, explain how this plan accounts for the management of historic properties.

Please refer to the response to Question 9a of this report.

14c. 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?

Beyond the Cooperative Agreement that AFRH maintains with the NTHP for limited public visitation to the Lincoln Cottage Visitor Center and site, security and other agency concerns largely limit additional heritage tourism activities.

When soliciting for economic development at AFRH, the agency may engage with any number of local and federal government stakeholders to improve the process and expedite the execution of

leases and/or economic development partnerships as possible. Stakeholders including the General Services Administration and federal design review bodies are included in the process as early as possible so as to identify and capture the maximum extent of any given opportunity. Community stakeholders are included in Section 106 and NEPA consultation to enrich the results of development and create mutually beneficial agreements, and AFRH is engaging in regular communications with neighborhood and community groups interested in partnering with AFRH.

14d. 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.

14e. 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.

Any lease to a third party developer will include appropriate covenants to ensure compliance with the Secretary of Interior's Standards as well as complete consistency with the AFRH-W Master Plan.

14f. Does your agency limit public access to historic properties? If so, what considerations affect decisions to limit access?

Because the security and safety of AFRH residents is of primary concern to the agency, the agency must restrict access to its properties. Restricted access has substantially limited the availability of historic AFRH properties for third-party use, including local 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 limited visitor access.

AFRH currently allows controlled access to the President Lincoln's Cottage heritage tourism site. Visitors to the site enter through the main gate (Eagle Gate), along with all AFRH staff, residents, and visitors. Tours of the Cottage are offered seven days a week. All tickets must be purchased in advance and shown at the gate, and visitors are not permitted to explore the grounds beyond the vicinity of the Cottage and the associated Visitor's Center.

Since the 2011 progress report, steps have been taken to open up a limited portion of the campus at AFRH-W to the public. In 2013 and 2014, the agency opened the west side of the campus at Randolph Street Gate for the community to view the Downtown fireworks display from the AFRH driving range. As many as 1500 members of the public have attended this holiday celebration at the Home. Similarly, AFRH-W now hosts an annual Oktoberfest event that is open to the public.

AFRH is in discussions with Friends of the Soldiers Home (FOSH), a local non-profit organization, regarding potential uses of the southwest corner of the property. Minimally disruptive activities such as farmers markets, flea markets, and park uses are under consideration. While arrangements with FOSH may require the group to be financially responsible for any security and improvement expenses, security is still a primary concern. Any arrangement with FOSH may specify limited hours of campus use and guidelines for access and use by AFRH Residents.

Question 15: Explain how your agency has used Section 111 (16 U.S.C. 470h-3) of NHPA in the protection of historic properties.

15a. Does your agency utilize Section 111 authorities in the management of historic properties? If yes, provide examples of how your agency has used this authorization.

See 15c below.

15b. If your agency has not used Section 111 authorities, explain why and any impediments for using this authority.

See 15c below.

15c. 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?

AFRH follows 24 USC §411 in lieu of Section 111 of the NHPA when transferring or disposing of its historic properties. The proceeds from any such disposal of real property shall be deposited in the AFRH Trust Fund.

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

- | | |
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| 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 |

Question 16: Explain how your agency has employed the use of partnerships to assist in the use of historic properties.

16a. Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the use of historic properties.

The 2008 AFRH-W Master Plan (MP) promotes economic development by opening 77 acres of the Washington campus to development by a third party. The MP identifies campus facilities that should remain in AFRH use and those that might be used by others to generate revenue for AFRH. All of the land uses identified in the MP reflect market potential and the needs of the surrounding community.

As stated in the response to Question 10a, any other partnerships and associated agreements must be consistent with 24 USC §411. As such, all partnerships for local economic development sought by AFRH outside of the Master Plan must be compatible with the agency mission. 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.

16b. If your agency uses partnerships, please describe the natures of these partnerships.

See 16c below.

16c. How have partnerships benefited your agency?

As discussed in the response to Question 10c 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.

Also, as discussed in response to Question 12 of this report, AFRH has successfully leased spaces within its historic buildings to individuals, government entities, schools, and non-profit organizations. Third party developers are a prospective addition to this group of primary tenants in substantial parcels at AFRH-W.

16d. Does your agency have any volunteer programs? If so, how are volunteers used in the management or interpretation of historic properties?

The United States Coast Guard volunteers at AFRH-W to participate in beautification projects for the historic lakes on the campus. Volunteers from the local Chief Warrant Officers Association and Chief Petty Officers Association visit the site twice a year in April and October to provide their

services to AFRH. Two of the AFRH-W residents also volunteer at the President Lincoln's Cottage heritage tourism site, providing tours to visitors.

AFRH is currently in discussions with members of the surrounding community to determine how volunteers can further assist the agency in the management and interpretation of historic properties at AFRH-W. Friends of the Soldiers Home (see answer to 14f) may be a significant resource for volunteers in the years to come.

A long-time resident of Park View, the neighborhood immediately west of AFRH-W, was eager to contribute historic photographs taken at the Home when it was open to the public as a park surrounding the turn of the twentieth century. These images are an insightful addition to the Hall of Honors exhibit in the new Scott Building.

Question 17: Provide Specific examples of major challenges, successes, and/or opportunities your agency has encountered in using historic properties over the past three years.

Please see responses to questions 10c and 16c of this report.

Question 18: Describe your agency's sustainability goals and climate change adaptation planning and how stewardship of historic properties is being addressed.

RESPONDING TO EO 13514

Adopting a proactive approach to tracking and reducing energy, water, waste, and greenhouse gas (GHG) emissions, AFRH has retained ICF International/ICF Marbek to help with compliance goals under EO 13423 and 13514. ICF's report, "Toward an Integrated Sustainability Plan," was presented to AFRH in May 2011; it includes data representative of AFRH's baseline year (2008) as well as mitigation strategies and recommended mitigation activities. AFRH intends to use this information to reduce operational costs and energy consumption, specifically its GHG emissions to comply with EO 13514.

SETTING AND ACHIEVING SUSTAINABILITY GOALS

A main agency initiative that is largely complete is to consolidate the AFRH-W operational footprint and update facilities within this smaller footprint within the campus core. Consolidation of operations included the decommissioning of the LaGarde Building at the South end of campus and the opening of the new Scott Building at the north end of campus. AFRH-W has already shown reductions in GHG emissions, with total emissions 6% lower in 2010 than they were in 2008. While total emissions readings are complicated by the demolition and construction of buildings over recent years at both the Washington and Gulfport facilities, AFRH's overall energy intensity in FY2012 was 25% lower than the baseline year of 2003. Green building strategies for individual facilities will also assist AFRH in achieving

The GHG emissions at AFRH-W have been divided into three scopes for purposes of tracking and analysis: Scope 1 includes Natural Gas Combustion and Diesel Generators; Scope 2 includes Purchased Electricity; and Scope 3 includes Transmission and Distribution Losses, Employee Commuting, and Wastewater Treatment. These are the same scopes used by the DoD to monitor and track GHG emissions. ICF has provided recommendations for EO 13514 reduction targets based on these scopes, which inform AFRH facility management and capital improvements.

The new Scott Building opened in the spring of 2013 and is already a LEED Gold facility. With additional and innovative upgrades to the original design, the new Scott Building is expected to reach LEED Platinum standing by 2015. This will help AFRH reach its sustainability goals under EO 13514. The new Scott Building replaces the 1950s Scott Building, a Non-Contributing resource to the AFRH-W Historic District. Specifically, the new facility is 52% smaller than the previous Scott Building, and is approximately 30% more energy- and water-efficient per square foot than the Scott Building. In one undertaking, AFRH has successfully consolidated operations, decommissioned a non-contributing building, eliminated an associated shuttle service, and replaced an inefficient dormitory building with one soon expected to be LEED Platinum. In addition to all of these efforts in sustainability, the new Scott Building is more sensitive to and compatible with the AFRH-W historic district. This is a major accomplishment for the agency and lays a foundation for future successes in sustainability and preservation.

COMBINING SUSTAINABILITY AND PRESERVATION GOALS

The effort to right-size the agency's footprint at AFRH-W aligns with AFRH's stewardship of historic properties in several ways. By consolidating the core of the retirement home in the north end of the campus, the administrative staff and the residents of the home will be concentrated around the historic core of AFRH. The demolition and replacement of the Scott Building with the new Scott Building not only increases the sustainability of AFRH, but also improves the historic integrity of the main quadrangle. The siting, massing, and height of the new building will restore the original north-south axis of the quadrangle, as well as the views toward downtown Washington from the Sherman Building and from Lincoln Cottage (the Sherman Building and Lincoln Cottage are both part of the National Historic Landmark at AFRH, designated in 1977).

Additionally, the concentration of all main aspects of resident life around the original historic core of the Home creates a pedestrian-friendly environment. AFRH has been able to reduce shuttle services to bring down GHG and overall vehicular use while giving residents an opportunity to relax in and have more personal interactions with their historic home.

Smaller projects like the renovation of the historic Quarters buildings will also simultaneously achieve preservation and sustainability goals. Sealing the building envelope, updating kitchen appliances, and servicing HVAC equipment will improve energy efficiency while protecting the building from water damage and general deterioration. Further, all work to improve the energy performance of these historic buildings will be designed and undertaken in a manner that is consistent with relevant preservation standards. All work will be reviewed as part of the agency's preservation review procedures. Renovations to the Quarters will also create a more inviting environment for tenants, which encourage continued use of the historic buildings.

Proposed projects such as the installation of solar shingles on the Sherman Building would improve energy efficiency and simultaneously replace non-original asphalt roofing. Ideas like this one are consistently considered for inclusion in planning documents like the CIP and Long Range Financial Plan.

18a. Has your agency prepared a Strategic Sustainability Performance Plan in accordance with EO 13514, and if so, does it include discussion of historic properties?

AFRH has developed a Strategic Sustainability Performance Plan in accordance with EO 13514. The process began with the preparation of the EO 13514 Compliance Strategy Report for AFRH, as well as an Investment Grade Energy Audit that was submitted to AFRH in July 2011. These two

reports outline several recommendations for investments and improvements that will help AFRH meet goals under EO 13514, and will inform a significant portion of the Strategic Sustainability Performance Plan. Historic properties are integral to the operations at AFRH, and thus are addressed specifically throughout the plan. The Investment Grade Audit does not specifically discuss historic preservation in the analysis of water and energy consumption, but its recommendations are largely consistent with preservation goals. The Compliance Strategy for EO 13423 and 13514 report, "Toward an Integrated Sustainability Plan," was prepared with explicit regard for the historic integrity of the AFRH campus. ICF designed the mitigation recommendations proposed in the report, "in a way that it believes are consistent with AFRH's overall mission - i.e., so that they will preserve the historical integrity of the campus while maintaining or improving quality of life for residents" (p. 81).

Since these reports provide the foundation for AFRH's Strategic Sustainability Performance Plan, historic preservation goals are already built into the planning process for EO 13514 compliance. AFRH will continue this approach as it continues to update and implement its performance plan.

18b. Is your agency considering impacts to historic properties when addressing climate change preparedness and resilience in accordance with EO 13653?

AFRH is undertaking efforts to comply with EO 13653. As plans and programs are developed, AFRH will consider potential adverse effects to historic properties by including the CR Manager in planning activities and following the Section 106 review process outlined in the AFRH-W PA and HPP.

18c. How does your agency coordinate historic preservation and sustainability goals in project planning?

AFRH retains a CR Manager to review all project undertakings from a historic preservation perspective, and has retained sustainability consultants to identify opportunities for AFRH to reduce operational costs and achieve energy consumption reductions. These contractors with preservation and sustainability perspectives worked collaboratively on a team to help AFRH create a ten-year Capital Improvement Plan (FY2011-2021), and incorporated both interests into the proposed projects. Goals of preservation and sustainability were successfully combined in proposed capital improvements. For instance, AFRH proposes to rehabilitate the historic lakes, which will catch and recirculate runoff rainwater for use in fountains and irrigation of the golf course. This capital improvement project will result in significant potable water consumption intensity reductions and will create the infrastructure for industrial, landscaping, and agricultural water consumption intensity reductions.

Additionally, AFRH is exploring options to use Energy Savings Procurement Contracts (ESPCs) to implement sustainability improvement projects, and is careful to consider contractors' experience with historic preservation projects in the selection process. Each Notice of Opportunity (NOO) specifies historic preservation concerns.

Finally, the agency's Long Range Financial Plan and Strategic Plan (2011-2015) both take sustainability into consideration for cost savings and energy efficiency, thereby building sustainability goals into nearly every proposed project and planning document.

18d. Has your agency rehabilitated or adaptively reused historic properties to achieve sustainability goals?

AFRH is in the process of evaluating options for rehabilitation and reuse of the Heating Plant (Building 46, Contributing resource to the AFRH-W Historic District) for improvements in energy efficiency. With the 2013 decommissioning of the Heating Plant (Building 46), AFRH replaced its functions with individual boilers for each active building on campus. The individual units eliminate most excess output and achieving near 90% efficiency. AFRH had previously considered conversion of the building into a cogeneration plant, but this recent improvement in energy use also leaves the plant available for redevelopment and rehabilitation by a third party.

18e. How has your agency promoted the rehabilitation of historic properties to achieve energy efficiency goals as an alternative to new construction?

Although AFRH has not directly promoted the rehabilitation of historic properties to achieve energy efficiency goals as an alternative to new construction, AFRH has not constructed a new building to accommodate functions that are currently housed in a historic building for the purpose of improving energy performance. Rather, AFRH has identified capital improvement projects that improve the energy efficiency of occupied historic buildings in lieu of demolition and new construction.

The agency's decision to demolish and replace the Non-Contributing Scott Building rather than occupy a vacant historic building at AFRH-W was related primarily to programmatic considerations rather than energy efficiency.

18f. How is your agency planning for the continuous improvement and better building performance management, energy efficiency enhancements, and energy waste reduction in an open and transparent way, as outlined in the *Presidential Memorandum: Federal Leadership on Energy Management (Dec. 2013)*?

AFRH is committed to its SSPP, and is striving to achieve its goals through efforts described in other publicly available reporting and planning documents such as the annual Performance Accountability Report (PAR), and the four-year Strategic Plan (2011-2015), which are both available on the agency's website.

The new post-Hurricane Katrina facility at AFRH-G and the new Scott Building at AFRH-W are both LEED certified buildings, illustrating that sustainability is a serious concern for the agency. The efforts to go above and beyond federal requirements with the potential LEED Platinum status of the new Scott Building shows that AFRH is not only dedicated to sustainability, but also an emerging leader in this field.

18g. Has your agency faced resistance to use of historic properties due to the perceived incompatibility of preservation with sustainability goals and climate resilient investment?

AFRH has not made the decision to vacate historic buildings at AFRH-W based solely upon their energy performance. The use of AFRH-W buildings has been based on the goal of consolidating operations in the core of the campus to improve operational and energy efficiency, as well as to create a more cohesive staff and resident community. Consolidation has led to the vacancy of

some historic buildings outside of the campus core, but the Sherman Building (one of the most historically significant buildings at AFRH-W) is one of the three primary buildings used as part of the consolidated agency operations.

Potential ground leases (especially Zone A) may result in sustainable improvements to historic properties by third parties. Additional income from these leases could allow AFRH to implement sustainable improvements to AFRH-occupied historic properties as well, such as use of the existing ponds for storm water retention, and the use of solar shingles.

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