

UNITED STATES DEPARTMENT OF HOMELAND SECURITY

REPORT TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION AND THE SECRETARY OF THE INTERIOR

In Accordance With Section 3 of

EXECUTIVE ORDER 13287 "PRESERVE AMERICA"

SEPTEMBER 2011 UPDATE



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INTRODUCTION

The Department of Homeland Security (DHS) is pleased to submit the 2011 Update of the Section 3 Report (2011 Update) in accordance with the requirements of Executive Order 13287 (EO 13287), "Preserve America," specifically Section 3(c) (Section 3). This report updates the Fiscal Year (FY) 2004, 2005, and 2008 Section 3 reports to the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior.

Section 3 of the Executive Order requires each Federal agency with real property management responsibilities to prepare an assessment of the current status of its inventory of historic properties as required by Section 110(a)(2) of the National Historic Preservation Act (NHPA) (16 U.S.C. 470h-2(a)(2)). The assessment includes the general condition and management needs of such properties, and steps underway or planned to meet those management needs.

In April 2011, the ACHP released the *Advisory Guidelines Implementing Executive Order 13287, "Preserve America" Section 3: Reporting Progress on the Identification, Protection, and Use of Federal Historic Properties.* This publication contains questions directed to federal agencies with real property management responsibilities. DHS' real property management responsibilities include historic properties owned by the Federal Emergency Management Administration (FEMA), the Federal Law Enforcement Training Center (FLETC), U.S. Immigration and Customs Enforcement (ICE), U.S. Coast Guard (USCG), U.S. Customs and Border Protection (CBP), and the Science & Technology Directorate (S&T). In the 2008 Update, it was reported that the United States Secret Service (USSS) was the owner of the Webster School in the District of Columbia. It has since been determined that the property is actually owned by the General Services Administration (GSA). The USSS does not own any historic properties. The ACHP plans to use agency feedback to measure the effectiveness of historic preservation within federal agencies. Questions posed by ACHP cover three broad areas: Identification, Protection, and Use. For clarity, this report is divided into these three broad categories to mirror the ACHP 2011 Guidelines.



THE DEPARTMENT OF HOMELAND SECURITY

DHS was created by the Homeland Security Act of 2002 in response to the terrorist attacks of September 11, 2001. The following is DHS' mission: We will lead the unified national effort to secure America. We will prevent and deter terrorist attacks and protect against and respond to threats and hazards to the Nation. We will secure our national borders while welcoming lawful immigrants, visitors, and trade.

DHS has limited real property portfolios, and the majority of its business is conducted from property leased from or managed by other Federal entities. An example is that in recent years DHS has been closely associated with the St. Elizabeth campus in the District of Columbia, which is planned to house several DHS headquarters' functions. However, while DHS is a tenant at the St. Elizabeth campus, GSA is responsible for the property as the owner and manager. While DHS' property inventory is limited, there are historic properties within its inventory that range from custom houses to lighthouses.

The nature of the Homeland Security mission also directly impacts the manner in which DHS manages its historic properties. Security considerations require that nearly all DHS historic real property be closed to public access. Only a small number of DHS historic properties allow public access by special appointment.



IDENTIFICATION OF HISTORIC PROPERTIES

The National Historic Preservation Act (NHPA) requires Federal agencies to identify historic properties within their real property inventory. Under NHPA and its implementing regulations, identification of historic properties can occur either through an agency-wide survey (Section 110 survey) or through specific project related identification efforts (Section 106 surveys).

ACHP Advisory Guidelines 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 improved? Please explain.

DHS' real property management responsibilities include historic properties used by FEMA, FLETC, ICE, CBP, S&T, and USCG. The largest inventory of historic properties within DHS is the USCG's almost two hundred historic lighthouses. Since the 2008 Update, a total of 34 potentially eligible USCG properties have been identified. This includes the evaluation of three archaeological sites, completion of 13 nominations to the National Register of Historic Places (NRHP), and evaluations of 18 properties for NRHP eligibility that are in process.

Plum Island, off the coast of New York, has been occupied since the pre-contact era, housed the Fort Terry military installation used through the end of World War II, and is currently the location of S&T's Plum Island Animal Disease Center (PIADC) which dates to 1952. Since the 2008 Update, the Plum Island Light Station (1869-1960) has been listed on the NRHP as of February 11, 2011. DHS will be surveying the remainder of Plum Island for National Register eligible properties during FY 2012.



FEMA is preparing to evaluate the c. 1930 buildings of the Center for Domestic Preparedness in Anniston, Alabama for historic significance. This property is a recent acquisition to the FEMA property inventory. In addition, FEMA is evaluating its Mount Weather Emergency Operations Center (MWEOC) in Virginia to determine its eligibility for listing on the NRHP.

CBP's efforts in identification of historic properties over the past several years have focused on Section 106 compliance. CBP is ensuring they follow 106 requirements for all construction, repair, and renovation projects. Since the 2008 Update, over twenty historic CBP properties have been identified.

ICE, formerly part of CBP, is currently in the process of evaluating its properties for potential historic significance and to ensure 106 requirements are fully met.



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

DHS agency-wide policy for the identification and evaluation of historic properties is found in DHS Directive 017-01, *Historic Preservation in Asset Management and Operations* (Directive 017-01). Directive 017-01, ". . . establishes policy and procedures of appropriate consideration of historic properties and sacred sites in the management and operation of the full range of the Department of Homeland Security (DHS) assets. It establishes appropriate DHS roles, responsibilities, and lines of accountability to apply the relevant requirements of historic preservation public policy to DHS activities." Directive 017-01 is available on-line at http://www.dhs.gov/xlibrary/assets/foia/mgmt_directive_017_01_historic_preservation_in_asset_management_and_operations.pdf. All DHS Components are required to follow Directive 017-01. In addition, a Component may develop its own guidance or directive specific to its needs and missions.

DHS Components are required to fill out an Environmental Planning and Historic Preservation (EP&HP) Scorecard (Scorecard) to evaluate conformance with various EP&HP requirements on a quarterly and annual basis. The FY 2011 Scorecard included a measure that captures Components' efforts in the identification and tracking of historic properties for Section 110 compliance. The Scorecard is for internal DHS use only.

Because of its unique inventory of historic properties, USCG has developed its own policies for the identification and evaluation of historic properties. USCG participates in the National Historic Lighthouse Preservation Act (NHLPA) and follows USCG Commandant Instruction (COMDTINST) M16475.1D, *National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts* (which includes policy on Section 106 and Section 110). This document is available on-line at http://www.uscg.mil/directives/cim/16000-16999/CIM_16475_1D.pdf. In the future, the USCG plans to write a historic and cultural resources policy that is aligned with the DHS Directive but which is specific to the USCG.

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

Goals for the identification and evaluation of historic properties are specific to each Component. FLETC has a goal to document and provide information to the general public about the historic buildings and uses of its campus in Glynco, Georgia. This goal has been met over the past three years through a program to label historic buildings on the campus.

USCG has set goals for the identification and evaluation of all remaining USCG lighthouses for nomination to the NRHP. Determinations of eligibility by the Keeper are included in this goal. USCG has almost completed this goal and is anticipating that all eligible lighthouses will be nominated to the NRHP by FY2014. USCG has also established a target for the identification and evaluation of properties associated with the U.S. Lifesaving Service (USLSS) and pre-1950 USCG boat stations. USCG intends to complete a NRHP Multiple Property documentation form for USLSS stations, houses of refuge, and pre-1950 boat stations. To track the progress of these



initiatives against internal goals, the USCG uses internal management systems and the department-wide EP&HP Scorecard.

S&T's goal after the 2008 Update was the nomination of the Plum Island Lighthouse to the NRHP. This goal was met between the 2008 and 2011 Updates, and it is now focusing on the evaluation of other Plum Island properties. ICE's goal for the identification and evaluation of historic properties aligns with DHS and federal policies and regulations. CBP has set a goal for the inventory of one-third of all properties each year until completed, with updates every five years for newly acquired properties. One of FEMA's goals is to evaluate its Mount Weather facility.

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

Internal reporting of historic properties, including collections, is fairly consistent throughout DHS. All of the Components use the EP&HP Scorecard, and the Components with archaeological collections provide information for the National Park Service's (NPS) annual *Secretary of the Interior's Report to Congress on the Federal Archaeology Program.*

USCG's internal reporting requirements include consultation with the USCG Historian's Office concerning the identification and disposition of artifacts aboard Coast Guard cutters slated for decommissioning, in addition to tracking historic properties using internal management systems and the financial accounting requirements for heritage assets.

S&T has inventory information on the Fourth Order Fresnel lens from the Plum Island Lighthouse that is currently on loan to a museum. FLETC maintains a museum quality display at the Brunswick Golden Isles Airport in Brunswick, Georgia, along with the associated paperwork. ICE maintains a computer database and hardcopy files of all historic properties and sites owned by the agency.

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

DHS is an agency with a mission centered on the security of the country. The majority of DHS real property is actively used for homeland security purposes. Security concerns have been a limiting factor for establishing partnerships to assist in the identification and evaluation of DHS historic properties. Nevertheless, when possible, the department has taken advantage of partnerships to assist in its historic preservation responsibilities.



Glynco, c.1955



USCG partners with several historic preservation groups for the lease of USCG-owned lighthouses. The lease holders assume responsibility for maintaining and rehabilitating the lighthouses. These partnerships have resulted in the leaseholders providing relevant and useful information to the USCG when evaluating the properties for NRHP eligibility.

S&T partners with lighthouse enthusiasts to allow access to the Plum Island Lighthouse for exterior tours; the interior of the lighthouse is off limits to the public because of environmental hazards. CBP has had individual projects that have resulted in partnerships with local preservation organizations and universities. The partnerships with universities tend to be limited to curation agreements.

FLETC has a Memorandum of Agreement in place with the Georgia State Historic Preservation Office (SHPO) and the Glynn County Historical Society to display framed photographs depicting the history of the Glynco campus. This photo display is part of a series of rotating exhibits that are displayed at the St. Simons Island Lighthouse, which is a historic property. Additionally, FLETC has a partnership with the Brunswick Golden Isles Airport in Brunswick, Georgia for an off-site museum quality display.

DHS also has several mission-related partnerships that may provide benefit to historic preservation and general cultural resources management. CBP missions and geographical reach have led to partnerships with American Indian tribes, and CBP has established tribal liaisons at specific border patrol stations. CBP has also worked closely with both domestic and foreign entities for the repatriation of artifacts, including the recent repatriation of seized Chinese artifacts that occurred in March 2011 in a joint venture with ICE.

ACHP *Advisory Guidelines* **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*.

CBP has benefited from the American Recovery and Reinvestment Act of 2009 as its funding has yielded increased resources for the identification and evaluation of ports of entry. The information gained from the identification of the ports of entry is used by CBP to enhance its Section 110 inventory. One success for CBP was the discovery of the archaeological remains of a turn of the century township in Boundary, Washington and the resulting data recovery. This project included outreach and close coordination with local tribes and community organizations to develop a combined Phase II and Phase III data recovery plan.

USCG has been successful in fulfilling its role in the NHPLA three-agency partnership with GSA and NPS. These efforts include preparing NRHP nominations and determinations of eligibility for lighthouses proposed for inclusion in the NHPLA program. From 2002 through the end of 2010, USCG has transferred ownership of 58 lighthouses under NHLPA. To date, 43 have been transferred to qualified nonprofit organizations and state or local government entities, and 15 have been transferred through public sales. Other USCG successes include the development of a NRHP Multiple Property Documentation Form (MPDF) for USLSS stations, houses of refuge, and pre-1950 USCG boat stations, and a preliminary inventory of such properties presently owned by USCG.



FEMA, while having limited identification responsibilities because it only owns a few properties, works diligently to identify historic properties during disaster response and recovery efforts. The disaster work has put FEMA in the forefront of creative mitigation as they work closely with local communities when a resource is lost or damaged. Recent mitigation efforts have included developing educational activities centering around the southern coalfield region of West Virginia, preparation of a historic context evaluating the influence of automobiles on the built environment in Cedar Rapids, Iowa, and salvage and reuse of historic features from a high school slated for demolition in New Orleans.

PROTECTION OF HISTORIC PROPERTIES

The consideration of historic properties, both agency owned and non-agency owned, is a federal agency responsibility that is specified in 36 CFR Part 800 and Section 106 of the NHPA. Consideration of historic properties can lead to protection through the Section 106 process as various outcomes are examined, including avoidance and mitigation.

ACHP *Advisory Guidelines* **Question 7:** *Explain how your agency has protected historic properties.*

Protection of DHS-owned historic properties is accomplished daily through appropriate maintenance and repair. The methods used to protect historic properties in DHS' inventory vary based on mission needs. For example, USCG's historic properties that are not currently being used are protected through mothballing after consultation with the appropriate SHPO. Mothballing includes closing off windows and entrances while allowing for ventilation. It also includes the restriction of unauthorized access through passive measures such as fencing. These protective measures have been implemented for the nationwide system of USCG LORAN-C stations that were decommissioned in 2010. Leases are also a form of protection of historic properties used by USCG. The lease agreements contain conditions for the protection of the historic character of the properties by the lessee.

Maintenance and repair are the cornerstones of FLETC's protection of historic properties. They currently maintain two historic districts and various individual historic properties on the Glynco campus. FLETC also meticulously documents each historic property at Glynco that is no longer being used by FLETC but is left in place. The documentation is accomplished in consultation with the SHPO. ICE is a strong advocate of adaptive use for historic properties. CBP is currently using all of its historic properties for agency activities. S&T nominated Plum Island Lighthouse to the NRHP.

ACHP *Advisory Guidelines 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 NHPA.

In general, DHS relies on the law and implementing regulations for Section 106 and DHS Directive 017-01, and the EP&HP Scorecard to aid in the protection of historic properties. DHS also has an Environmental Planning and Historic Preservation Committee comprised of natural



and cultural resources staff from each DHS Component; monthly Committee meetings and an email distribution list are an important means of sharing information and best practices among the historic preservation practitioners in DHS. In recent years, the number of staff with historic preservation expertise at DHS Headquarters and in the Components has increased, thereby improving DHS' ability to address historic preservation considerations. With its focus on the homeland security mission, DHS frequently meets its Section 110 responsibilities through Section 106 compliance on individual activities. Security issues preclude the use of Section 111 for most DHS Components, with the exception of lighthouses in the USCG.

DHS also promotes and protects its historic properties through the development and use of guidance documents and policies, training of staff and contractors, establishment of componentlevel preservation programs and offices, NRHP nominations, direct use, and lease agreements. For example, CBP's historic preservation handbook for CBP personnel addresses Section 106, the Native American Graves Protection and Repatriation Act (NAGPRA), and the Archaeological Resources Protection Act (ARPA). Another example is the previously discussed policy and guidance documents that USCG follows to ensure compliance with environmental planning requirements, including NHPA.

DHS is fully compliant with NHPA Sections 106 and 110. USCG has established programs and procedures to ensure the protection of historic properties. The programs include the USCG's NHLPA Program in the Office of Environmental Management (COMDT CG-47). This program coordinates the documentation and disposition of historic lighthouses identified as surplus to USCG needs. The USCG Surface Infrastructure Logistics Center (SILC) includes an Environmental Management Division that provides advice and guidance to Environmental Protection Specialists at the various field units, including but not limited to USCG Civil Engineering Units (CEUs) at Providence, RI, Cleveland, OH, Miami, FL, Oakland, CA, Juneau, AK, and Honolulu, HI. As previously discussed, Section 111 compliance is robust within the USCG through the use of lease agreements with various entities. FEMA has a robust Section 106 training program and has historic preservation staff in each of its 10 regional offices and Headquarters to oversee Section 106 compliance.

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

As previously discussed, all DHS Components are required to follow DHS Directive 017-01 and the EP&HP Scorecard, and the Components with archaeological collections provide information for the NPS's annual *Secretary of the Interior's Report to Congress on the Federal Archaeology Program.* The USCG policies that promote and/or influence the protection of historic properties include adhering to M16465.1D. The USCG also utilizes guidance concerning lighthouse maintenance in the form of a handbook created in partnership with NPS, as well as published policy by the USCG Historian's Office on the care and maintenance of classical Fresnel lenses that are provided on loan for display, or transferred pursuant to NHLPA, to nonprofit organizations, museums, and state and local government entities.



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

Partnerships with outside entities have traditionally been difficult for DHS because of security concerns and prohibitions. However, difficult does not mean impossible.

As previously discussed, USCG has partnered with various historic preservation groups, and state and local government agencies for leasing historic lighthouses. The entity awarded the lease assumes responsibility for maintenance and rehabilitation of the property. USCG also partners with SHPOs concerning the management of historic properties through consultations pursuant to NHPA Section 106 and NRHP nominations pursuant to NHPA Section 110. USCG has been successful in fulfilling its role in the NHLPA three-agency partnership with NPS and USCG.

FEMA is the co-sponsor of the Heritage Emergency National Task Force (Task Force). The Task Force is a coalition of federal agencies and national and regional service organizations working together to ensure that cultural institutions and the public receive timely information and assistance during disasters. The Task Force has focused its recent efforts on strengthening the relationships between the cultural heritage community and first responders and emergency managers. In addition to FEMA, NPS, National Archives and Records Administration, and the Smithsonian are actively involved in the Task Force.

ACHP *Advisory Guidelines* **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.*

The most significant challenge in DHS remains associated with its efforts to integrate its historic preservation responsibilities into its homeland security mission areas. Its breadth of missions often results in DHS encountering a wide range of historic property types, such as vessels, prehistoric archeology, and neighborhoods developed after World War II. In addition, many of its activities, where historic properties are implicated, occur on property that is not under federal control; such as with activities along the land borders, in airports, with bridge administration, and disaster mitigation. Challenges in these situations involve engaging non-federal parties in the federal Section 106 process, which may include historic property identification effort. With its own historic properties, challenges typically involve project specific situations, when operational needs impact historic properties (e.g., a building construction or renovation project to accommodate an increased number of personnel or to improve physical security). These types of challenges typically involve issues with project funding and scheduling that are resolved through project management intervention.

DHS generally understands the nature of the historic properties over which it has direct responsibility. Successes in protecting historic properties over the past three years include FLETC's program to place signs and establish displays addressing historic properties at the Glynco campus. Examples of USCG successes in protecting historic properties over the past three years involve completing NRHP nominations and determinations of eligibility for lighthouses slated for entry in the NHLPA program, and the various lease agreements. FEMA is



actively looking to engage in more training and cooperation with state agencies to bolster Section 106 compliance

USE OF HISTORIC PROPERTIES

The use of historic properties enhances agency awareness of historic preservation through constant exposure to the needs and importance of historic properties. Maintaining and using historic properties also provides a richer landscape for the public as the progression of type, style, and use of properties can be experienced.

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

DHS uses its historic properties either for the original use of the property or through adaptive use. For example, the former St. Joseph's College campus in Emmitsburg, Maryland, once a Catholic school for girls from the early 1800s to the 1970s, is now the home of the National Emergency Training Center/Emergency Management Institute, which is used for training of

federal, state and local homeland security personnel, and the United States Fire Administration. It was listed on the NRHP in 1976.

At FLETC's Glynco campus, a former naval air station established in 1942, bermed bunkers and historic buildings have a variety of uses, including a National Industries for the Blind store, a uniform supply vendor, a print shop, the official FLETC movers/warehousing, roll player contractor offices (for training scenarios), a custodial contractor, and a maintenance contractor.

USCG has used historic lighthouses as



Diamond Head Lighthouse

active Federal aids to navigation (ATONs) until such time that the property's use as a Federal aid can be terminated. Several active lighthouse properties that include keeper dwellings are also used for USCG housing or recreational quarters for USCG personnel. An example of this is Diamond Head Light in Hawaii, which is used as the official residence of the Commanding Officer of USCG District 14. Other active lighthouse properties include buildings occupied for Federal government offices such as Portsmouth Harbor Light in New Hampshire.

ICE and CBP use all of their historic properties in some form, often achieved by applying adaptive use to historic properties.

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



DHS is generally able to maintain most of its historic buildings in good condition because they are currently in use. However, challenges sometimes arise. Maintenance challenges arise with those historic properties located in coastal environments, such as USCG and FLETC properties. Health and safety hazards can make human occupation of historic properties unsuitable, as is the case with the Plum Island Lighthouse.

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

DHS Directive 017-01 directly influences the use of historic properties in all components of the department. In addition, DHS real property management policies and procedures follow federal law, regulations, and the Scorecard.

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

As previously discussed, the use of Section 111 by DHS Components is usually precluded because of security concerns. USCG is the exception as it has used Section 111 by leasing automated lighthouses to groups that assume responsibility for maintaining and rehabilitating these properties. This program has the added benefit of enhancing local historic properties for the community.

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

Security issues generally prevent the development of partnerships in the use of DHS-owned facilities. However, as previously discussed, USCG has used partnerships to assist in the use of historic properties by leasing historic lighthouses to groups that assume responsibility for maintaining them.

ACHP *Advisory Guidelines* **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.*

FLETC is facing maintenance issues relating to asbestos, lead, and mold that put the continued use of its historic properties in question. Similarly, CBP has had to demolish some buildings (after completing Section 106 consultation) because of health and safety issues.

ACHP Advisory Guidelines Question 18: Describe your agency's sustainability goals in accordance with EO 13514 and how these goals are being met, taking stewardship of historic properties into account.

All DHS sustainability goals, in response to EO 13514, are formulated in accordance with DHS policy and guidance and may be found in the Department's Strategic Sustainability Performance Plan (SSPP). DHS has created an Executive-level sustainability working group to develop its plans for addressing sustainability and mission responsibilities. Additionally, each Component



has two executive-level representatives who are working the issues at the headquarters level and each Component has developed its own Operational Sustainability Performance Plan (OSPP) which highlights its goals and objectives for supporting the Department's sustainability commitments. The first meeting of the executive group was held in August 2011.

CONCLUSION

DHS, created less than a decade ago from 22 other federal agencies and departments, has made great strides in establishing a historic preservation program that includes a centralized function at DHS headquarters and Component-centric historic preservation programs. The creation of a centralized program in conjunction with Component programs has resulted in a more consistent approach to historic preservation throughout the Department while still recognizing the individuality of the Components' missions and historic properties. This construct has allowed both smaller Components and those that are larger to meet the same DHS requirements for historic preservation while maintaining a certain level of autonomy to address individual Component needs. For example, unique conditions in the USCG allow it to benefit from leasing its lighthouses; however security requirements in other components, such as S&T, normally preclude the leasing of lighthouses. DHS is a prime example of "one size does not fit all" in terms of historic preservation.

DHS looks forward to implementing new initiatives and continuing to enhance its existing programs to identify, protect, and use historic properties. DHS is constantly moving forward to meet its mission and stewardship requirements, learning from individual challenges and expanding upon Component successes.