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# **EXECUTIVE ORDER 13287**

## **PRESERVE AMERICA**

### SECTION 3 PROGRESS REPORT ON HISTORIC PROPERTIES



September 29, 2014

Facilities Management and Services Division Architecture, Engineering, and Asset Management Branch 1200 Pennsylvania Avenue, NW Washington, DC 20460

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#### I. INTRODUCTION

The U.S. Environmental Protection Agency (EPA) is pleased to submit the 2014 update to the *Section 3 Progress Report on Historic Properties* to the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior in accordance with the requirements of Executive Order (EO) 13287, "Preserve America," specifically Section 3(c). Section 3 of the EO requires each federal agency with real property management responsibilities to prepare an assessment of the current status of its inventory of historic properties mandated by Section 110(a)(2) of the National Historic Preservation Act (NHPA) (16 United States Code [U.S.C.] § 470h-2(a)(2)). It also requires agencies to report on the general condition and management needs of such properties, as well as steps underway or planned to meet those needs.

In May 2014, 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* (hereafter referred to as ACHP *Advisory Guidelines*). This publication contains questions for federal agencies with real property management responsibilities. The ACHP will use the responses from these questions to measure the effectiveness of historic preservation within federal agencies. The broad categories of questions are Identification, Protection, and Use.

This report provides an update of the Section 3 Progress Report on Historic Properties submitted by the EPA to the ACHP and the Secretary of the Interior in September 2005, September 2008, and September 2011, as well as EPA's initial Section 3 Report submitted in May 2005. Please refer to these earlier reports for more detailed information regarding the EPA's management policies and protocols as they relate to the care and maintenance of its historic properties.

It is important to note that only one property under the EPA's ownership is either listed in, or eligible for listing in, the National Register of Historic Places (National Register). As a result of an ACHP-accepted 1992 Memorandum of Agreement (MOA) with the New Jersey State Historic Preservation Officer (SHPO), the EPA's Edison Environmental Center is treated as eligible for National Register listing and maintained appropriately.

#### II. THE U.S. ENVIRONMENTAL PROTECTION AGENCY

Just 4 months after his January 1969 inauguration, President Richard Nixon established in his cabinet the Environmental Quality Council, as well as a complementary Citizens' Advisory Committee on Environmental Quality. By April 1970, the President's advisors advocated a separate regulatory agency devoted solely to the pursuit of anti-pollution programs.

Acting on their advice, the President decided to establish an autonomous regulatory body to oversee the enforcement of environmental policy. In a message to the House and Senate, he declared his intention to establish the EPA and left no doubts about its far-reaching powers. Nixon declared that its mission would center on:

- Establishing and enforcing environmental protection standards consistent with national environmental goals;
- Conducting research on the adverse effects of pollution and on methods and equipment for controlling it, gathering information on pollution, and using this information to strengthen environmental protection programs and recommend policy changes;
- Assisting others, through grants, technical assistance and other means, in arresting pollution of the environment; and
- Assisting the Council on Environmental Quality in developing and recommending to the President new policies for the protection of the environment.

The President accompanied his statement with Reorganization Plan Number 3, dated July 9, 1970, in which he informed Congress of his wish to assemble the EPA from parts of three federal departments, three bureaus, three administrations, two councils, one commission, one service, and many diverse offices (http://www2.epa.gov/aboutepa/guardian-origins-epa).

Today, the EPA uses approximately 9.9 million square feet of office buildings and laboratories located throughout the United States, a portfolio comprises both EPA and General Services Administration (GSA)-managed properties. To ensure that the EPA's buildings and practices reflect its environmental protection mission, the agency implements a wide range of strategies to reduce the environmental impact of its facilities and operations, from building new, environmentally sustainable structures to improving the energy efficiency of older buildings.

#### III. IDENTIFICATION OF HISTORIC PROPERTIES

The NHPA and Title 36 of the Code of Federal Regulations (CFR) Part 800 requires federal agencies to identify historic properties, which can occur either through an agency-wide survey (Section 110 survey) or through identification efforts tied to specific projects (Section 106 surveys). Both types of surveys are specified in the NHPA and are referenced in 36 CFR Part 800. Due to budget and manpower constraints, many federal agencies are completing their Section 110 surveys via individual Section 106 actions.

**ACHP** Advisory Guidelines Question 1: Building upon previous Section 3 progress 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.

The EPA commissioned historic building surveys in 2005 at all of its owned properties that are identified as being potentially historic. These surveys, which applied to three EPA-owned properties 50 years of age or older, are part of the EPA's condition assessment update processes. As a result of these surveys, it was determined that two of the facilities are ineligible for the National Register: the Gulf Ecology Division in Gulf Breeze, Florida, and the Large Lakes Research Station in Grosse Ile, Michigan, which houses the Large Lakes and Rivers Forecasting Research Branch. The third facility, the EPA's Edison Environmental Center in Edison, New Jersey, is already treated as National Register-eligible under the terms of a 1992 MOA. In 2012, Buildings 245/246 and Buildings 255/256 at the Edison Environmental Center were surveyed to determine their individual eligibility status under the 1992 MOA. Due to the age of the MOA, this small survey improved EPA's inventory of historic properties by providing up-to-date information on individual buildings, including their existing condition. No additional EPA-owned facilities have required historic building surveys in the last nine years. Finally, EPA has not acquired any other historic buildings or properties.



EPA's only National Register-eligible property, the Edison Environmental Center in Edison, New Jersey

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

When the EPA undertakes a project or action that could potentially affect a historic property, its policy and practice is to follow the National Environmental Policy Act (NEPA) review process and regulations, as well as NHPA Section 106 compliance procedures. The EPA's NEPA regulations are promulgated in 40 CFR Part 6. As a routine part of its NEPA and Section 106 processes, the EPA evaluates the site after identification of potential archaeological and historic resources. Determinations of Eligibility are made for each identified site using National Register criteria. The EPA also coordinates with the appropriate SHPO, local historic preservation entities, and federally recognized Native American tribes to ensure that these entities have an opportunity to consult as required by the NHPA.

**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?* 

All EPA-owned potentially historic properties have been identified and evaluated.

**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).* 

**EPA Office of Administration and Resources Management** – The Assistant Administrator of the Office of Administration and Resources Management (OARM) is EPA's Federal Preservation Officer (FPO). The EPA FPO's responsibility is to ensure agency conformity with regulatory and EO requirements regarding historic preservation. The EPA FPO also oversees communications with the EPA and the ACHP, the EPA White House Liaison, and other agencies, as appropriate.

**EPA Facilities Management and Services Division/AEAMB** – The day-to-day management, communication, and reporting responsibilities regarding Section 110 requirements of the NHPA have been assigned to the Facilities Management and Services Division (FMSD) within OARM, specifically the Architecture, Engineering, and Asset Management Branch (AEAMB), because of its hands-on knowledge and responsibilities relating to EPA's real property inventory and portfolio management. AEAMB's responsibilities include compiling data and developing reports for OARM to submit to the ACHP, the EPA White House Liaison, and other agencies (e.g., Office of Management and Budget), as required. AEAMB is also responsible for complying with Section 106 requirements related to undertakings affecting properties in the EPA's real property inventory.

**EPA Office of Enforcement and Compliance Assurance/Office of Federal Activities** – Cliff Rader, Director of the NEPA Compliance Division (NCD) within the Office of Federal Activities (OFA) is the EPA's Deputy Federal Preservation Officer (FPO) and Deputy Point of Contact (POC) for NHPA issues./NCD is within EPA's Office of Enforcement and Compliance Assurance (OECA), hereafter referred to as OECA/OFA. Matt Nowakowski, the Historic Preservation POC or subject matter expert also resides within OECA/OFA/NCD to coordinate and manage the day-to-day responsibilities of OECA/OFA as they relate to Section 106 and NHPA-related issues. These OECA/OFA representatives also communicate with AEAMB when appropriate and report activities to the EPA FPO. Additionally, Mr. Nowakowski, the OECA/OFA Historic Preservation POC, provides technical support to OARM and other EPA offices. His contact information is provided below:

Matt Nowakowski, MS, MSHP U.S. Environmental Protection Agency Office of Enforcement and Compliance Assurance NHPA Compliance OECA/OFA/NEPA (NCD) Mail Code 2252A Clinton Federal Building South 1200 Pennsylvania Ave., NW Washington, DC 20460 (202) 564-7156 direct

OECA/OFA is the EPA office that coordinates NHPA-compliance efforts at headquarters and across all 10 regional offices. The EPA POC for NHPA represents the EPA in actions related to NHPA compliance that are subject to review and/or joined (in consultation) by the ACHP. Often these are sensitive, time-critical projects where EPA is either the major funding source or a contributor to a multi-layered funding approach. The EPA may also be the licensing/permitting authority and this may require Section 106 consultation.

The EPA POC for NHPA is required to act on a micro- and macro-level for NHPA compliance. It is often necessary to present EPA's position to the ACHP and other federal and/or state agencies while assisting the regions with meeting EPA's NHPA compliance responsibilities. This is achieved through conference calls, written communications, individual discussions, and document reviews, where agreements must be created and subjected to review by the Office of General Counsel.

OECA/OFA also determines the applicability of Section 106 requirements and provides technical support to the EPA and regional office programs (e.g., funded projects, permits, contracts, and grants). OECA/OFA follows the NEPA review process to make these determinations, and works with the local SHPO and/or Tribal Historic Preservation Officer to ensure that historical integrity is preserved and adverse impacts are mitigated or minimized. OECA/OFA also compiles the EPA's data regarding undertaken efforts and costs incurred for site discovery and evaluation, looting and vandalism prevention, and artifact protection. This data is reported to the National Park Service (NPS) Federal Archaeology Program. OECA/OFA handles this responsibility for the EPA, since it manages the activities covered under the scope of NPS reporting requirements. Drafts of these reports are submitted to the EPA FPO for communication and comment.

### **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.*

As noted previously in the Question 1 response, EPA conducted the survey of four buildings at the Edison Environmental Center; initiated Section 106 consultation with the New Jersey SHPO per the MOA; and is in process of completing the consultation. The EPA continues to effectively use partnerships to assist in the protection of historic properties. In the case of EPA's Edison Environmental Center, the EPA established an MOA with the New Jersey SHPO to treat this property as eligible for listing in the National Register and to maintain it appropriately. The EPA also performed a Historic American Buildings Survey/Historic American Engineering Record

(HABS/HAER) in accordance with the MOA and consults with the SHPO when initiating qualified undertakings at the Edison Environmental Center, as noted above.

**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*.

As noted previously in the Question 1 response – no additional EPA-owned historic properties have been identified during the past 3 years.

#### IV. PROTECTION OF HISTORIC PROPERTIES

The consideration of historic properties, both agency owned and non-agency owned, is a responsibility of federal agencies 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.

As noted previously in the Question 5 response, in the case of the Edison Environmental Center, the EPA established an MOA with the New Jersey SHPO to treat this property as eligible for listing in the National Register and to maintain it appropriately. The EPA also performed HABS/HAER documentation in accordance with the MOA and consults with the SHPO when initiating qualified undertakings at the Edison Environmental Center. The EPA also has developed a Historic Resources Management Plan (HRMP) for this facility.

The response to Question 11 below also discusses how EPA's OECA/OFA has protected historic properties.



Maintenance of the Edison Environmental Center

**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.

The EPA has a systematic approach to inventory and evaluate all of its historic properties. In 2005, the EPA completed a formal screening of its agency-owned properties for historic potential. Those properties identified as having historic potential were surveyed against National Register criteria to

determine potential eligibility for listing. As previously stated only one of the EPA's properties, the Edison Environmental Center, is considered eligible for the National Register.

It is the EPA's policy to perform in-depth survey work, including archaeological investigations and historic structure evaluations, within the context of NEPA reviews for qualified EPA projects. This is consistent with the EPA goal of managing these properties with consideration of both cultural and historic values, as well as environmental impacts.

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

The EPA established an MOA with the New Jersey SHPO to treat the Edison Environmental Center as eligible for listing in the National Register and to maintain it appropriately. The EPA consults with the SHPO when initiating undertakings at the Edison Environmental Center and has also developed a HRMP for this facility. The response to Question 11 below also discusses how EPA's OECA/OFA has protected historic properties.

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

The EPA continues to effectively use partnerships to assist in the protection of historic properties. In the case of the EPA's Edison Environmental Center, the EPA established an MOA with the New Jersey SHPO to treat this property as eligible for listing in the National Register and to maintain it appropriately. The EPA also performed HABS/HAER documentation in accordance with the MOA and consults with the SHPO when initiating undertakings at the Edison Environmental Center.



EPA Region 1 Office, Boston, Massachusetts

The EPA Region 1 has an ongoing partnership with GSA for the renovation and use of the historic John W. McCormack Post Office and Courthouse. This building is located in downtown Boston and is a great example of an Art Deco government building. The GSA-owned and EPA-leased property was renovated in a manner sympathetic with the historic exterior, and the building now meets the

Leadership in Energy and Environmental Design (LEED) for new construction version 2.2 Gold and ENERGY STAR certifications. The environmentally friendly features of the building include a green roof planted with native and drought-resistant plants, high efficiency plumbing to save more than 30 percent in water consumption of a similarly sized building, and historically accurate high efficiency windows that maintain the visual appeal of the original windows while producing heating and cooling savings.

The EPA also partners with industry and the public sector on numerous programs and projects to reduce greenhouse gas emissions and encourage smart growth and sustainable planning efforts that can help protect historic properties. For example, the Partnership for Sustainable Communities, a joint effort of the U.S. Department of Housing and Urban Development (HUD), U.S. Department of Transportation (DOT), and the EPA, works to coordinate federal housing, transportation, water, and other infrastructure investments to make neighborhoods more prosperous, allow people to live closer to jobs, save households time and money, and reduce pollution; a key component of this program is increasing community revitalization and the efficiency of public works investments and safeguarding rural landscapes, including protecting historic properties.

The response to Question 11 below also discusses how EPA's OECA/OFA has protected historic properties.

**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.* 

OECA/OFA has been instrumental in supporting the Drinking Water State Revolving Fund (DWSRF) and Clean Water State Revolving Fund (CWSRF) programs, as well as the recent reissuance of the Construction General Permit (CGP) and continuance of the Multi-Sector General Permit (MSGP). OECA/OFA has assisted the Office of Water (OW) with these funding programs/permits by working with the various stakeholders to ensure that clean water projects can move forward while addressing NHPA compliance responsibilities under Section 106. A specific example of this multi-layer effort is OECA/OFA's support of Region 8 in its efforts to delegate certain NHPA compliance responsibilities (under 36 CFR § 800.2) to the South Dakota SHPO with a goal of streamlining review of clean water-related projects. The EPA POC for NHPA has met on numerous occasions with EPA headquarters staff regarding how the EPA can comply with NHPA for the DWSRF program through establishing new funding language and a nationwide "Preserve America" for those states with delegated programs.

The EPA POC for NHPA often advises regional staff regarding Superfund projects that impact historic properties. For example, two recent high profile Superfund projects with NHPA compliance issues include both the Fox River clean-up with maritime historic assets and the Hecla/Calumet Mining Site, which is a historic mining site. Both projects resulted in adverse effects to historic properties with concurrent discussions and consultation with the affected SHPOs, ACHP, EPA regional counsel, contractors, project staff, and the responsible parties as determined by the EPA. In both projects, successful outcomes were realized through OECA/OFA's efforts to assist in a resolution of many complex compliance issues.

One measure that indicates program activity and project improvements is the fact that OECA/OFA has been involved directly and indirectly with many high-level and important projects such as the Gowanus and Newtown Creek Superfund sites in New York (Region 2); Koppers Superfund site in Delaware (Region 3); SS Badger Clean Air Act (CAA) permitting issue (Region 5); 3M brownfield site in Minnesota (Region 5); Utah Underground Injection Control (UIC) projects in conjunction with U.S. Bureau of Land Management (Region 8); and Florence Copper in Arizona (Region 9); and. These projects have multiple funding and/or licensing aspects, numerous consulting parties, and complex NHPA compliance issues. These and other projects have resulted in an expanded role for OECA/OFA in ensuring that the EPA continues to incorporate NHPA compliance efforts into all of its programs—programs that impact the health and safety of Americans across every state and territory.

#### V. USE OF HISTORIC PROPERTIES

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

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

The EPA owns and maintains one historic property: the Edison Environmental Center. This facility supports the activities of various EPA organizations, including the Office of Solid Waste and Emergency Response's Environmental Research Branch, the Office of Research and Development's Release Control Branch, the Region 2 Division of Environmental Science and Assessment, the Region 2 Division of Emergency and Remedial Response, and the Region 2 Division of Enforcement and Compliance Assistance.

Please see the responses to Question 10 for additional information on the GSA-owned and EPA-leased historic building, the Region 1 EPA office.

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

The EPA owns and maintains one historic property—the Edison Environmental Center—which is maintained in good condition in accordance with the facility's HRMP.

The responses to Questions 7, 12, 14, and 17 provide additional information on the condition and use of the Edison Environmental Center.

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

The EPA has implemented policies that promote and/or influence the use of historic properties, such as incorporating consideration and protection of historic properties in its master planning process, and tracking information on historic properties in its Facilities Management System (FMS).

Every 10 years, the EPA performs a comprehensive site inspection and appraisal of its historic properties to assess their current condition and to document changes in their condition over time. Every 5 years, the EPA performs a condition assessment of its historic properties. As part of the condition assessment, the agency updates key characteristics of each building to provide information about the physical size and functional purpose of the building, as well as a detailed analysis of the current condition of the base building (e.g., structure, exterior, and roof) and interior characteristics (e.g., floor, walls, ceilings, and infrastructure systems). The condition assessment includes supporting documentation, such as photographs, maps, and drawings for further illustration and clarification. After these characteristics are identified and assessed, a maintenance schedule is developed that identifies the current condition, any required corrective actions, priority level, cost, and timeframe for implementation. Cost estimates are developed for labor and supplies and materials used to repair and improve these properties based upon industry benchmark data from various sources (e.g., *R.S.* 

*Means*). The EPA captures and analyzes this information about its historic properties and then tracks it in FMS.

The EPA monitors and manages the condition and maintenance of its historic properties at the facility level on a continual basis. Each facility is responsible for maintaining its own operation and maintenance plans, which are then incorporated into each historic facility's master plan.

### **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.

The EPA is not authorized to lease property. Instead, MOAs have been developed in certain instances for the transfer of funds to allow other agencies to use and/or occupy buildings or parts of buildings within the EPA's inventory. However, the EPA retains responsibility for maintaining these properties. The EPA would use the policies listed below if it were to excess historic property. It is important to note that based on master planning and customer considerations, the EPA does not anticipate the excessing or disposal of any of its currently owned historic properties, as these assets are fully used and considered critical for supporting the EPA's mission.

- EPA's Asset Management Plan
- EPA's NEPA Regulations (40 CFR Part 6) and Review Procedures
- EPA's Environmental Due Diligence Process, Policies, and Procedures
- GSA's policies and procedures to excess real property

Once the EPA decides to excess and transfer real property, the EPA prepares a Report of Excess (ROE). The ROE contains salient due diligence information (e.g., boundary survey, historic data, environmental studies, and title information). The ROE, with supporting documentation, is submitted to GSA's Office of Real Property Disposal operating unit assigned to a GSA Public Buildings Service regional office for processing and closure. The EPA follows the legislatively mandated process set forth in the 1949 Act for real properties to guide disposal actions and engages GSA's Office of Property Disposal as its disposal agent. The GSA Property Disposal Team processes the disposition. The team is bound by its policies and procedures for managing excessed property, which include consideration of historic properties for leasing, adaptive use, and preservation.

The EPA adheres to its established procedures and GSA's requirements for excessing properties. When an asset no longer meets the mission needs of an EPA program or region based on its performance results and trend data, the EPA considers adaptive and beneficial use options to the extent practicable. If these are not viable options, the EPA will then pursue excessing the property to GSA (i.e., real property transfer), demolition, or replacement options. Any of these actions will trigger the NEPA process and NHPA Section 106 compliance, which considers the impact of the federal action to potentially historic properties. In addition to NEPA and Section 106, the EPA's real property transfers (i.e., acquisition, lease acquisition or termination, or disposal of real property) will also trigger an Environmental Due Diligence Process (EDDP) review of the site and its historical uses and value. Among other things, the EPA's EDDP process ensures that all historical resources (potential and confirmed) are identified, documented, and fully disclosed during the property transfer process. The EPA's EDDP process is well defined in *Guidelines for Acquiring and Transferring EPA Real Property and Complying with the Community Environmental Response Facilitation Act* 

(*CERFA*), EPA 100-B-00-002, December 2000. The transfer and excessing of EPA-owned property has occurred only a few times in the last two decades with small buildings and parcels of land.

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

The EPA continues to leverage partnerships effectively to assist in the use of historic properties; the Partnership for Sustainable Communities, noted above, is a prime example of these partnerships. One recent case study highlighting the effectiveness of this program is the Moline (Illinois) Multimodal Station. To prepare for new intercity train service slated to begin in 2014, the City of Moline and MetroLINK, the regional transit provider, are working to transform an old warehouse into the Moline Multimodal Station. The station will house Amtrak service that will reconnect the Quad Cities to Chicago and should spark development opportunities in downtown Moline. The Moline station will include new construction as well as green renovation of the historic O'Rourke Building on a brownfield site. The project is receiving funding and expertise from the Partnership for Sustainable Communities, the Illinois Department of Transportation, and the City of Moline. Because the building is in the Moline Downtown Commercial Historic District, redevelopment must follow historic preservation guidelines to receive a tax credit. At the same time, the city's green building requirements call for LEED Silver certification. These potentially conflicting requirements could deter developers unfamiliar with navigating such a complex project. The EPA worked closely with the Federal Transit Administration, the city, and MetroLINK to clear this hurdle. The EPA provided assistance by developing case studies of successful green preservation projects, offering templates for Moline to follow. The Delta Institute, an EPA grantee, provided a green building readiness evaluation, which included a LEED certification strategy. MetroLINK and the City provided these materials to developers in a workshop that illustrated how to use historic preservation guidelines and tax credits while achieving LEED certification.

Please see the response to Question 10 for additional information on the GSA-owned and EPAleased historic Region 1 EPA office.

**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.

As noted previously in the Questions 1 and 12 responses, the EPA owns one property—the Edison Environmental Center—that is considered to be historic, and there have been no challenges encountered by the EPA in the use of the facility. However, in the past 3 years, the EPA initiated and is in the process of completing Section 106 consultation on Buildings 245/246 and Buildings 255/256 at the Edison Environmental Center. The successful consultation resulted in assisting the EPA with the appropriate re-allocation of funding for facility maintenance elsewhere on the EPA Edison campus.

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

The EPA is taking a number of common-sense steps to address the challenge of climate change. These steps include collecting various types of greenhouse gas emissions data; reducing greenhouse gas emissions and promoting a clean energy economy; conducting economy-wide analyses to understand the economic impacts and effectiveness of proposed climate policies; providing sustainable solutions for adapting to and reducing the impact from a changing climate; partnering with local, state, and tribal governments, as well as internationally; and helping communities plan for and adapt to climate changes.

The EPA's Strategic Sustainability Performance Plan (SSPP) is a comprehensive, multi-year planning document that identifies targets for reducing agency-wide greenhouse gas emissions by Fiscal Year 2020, and outlines steps that the agency will take to achieve those reductions. Through this report, the EPA not only meets the federal requirements of EO 13514, but also reiterates its plans to reduce energy, water, waste, and other resource use, and to incorporate sustainable design and operations across its facilities. The EPA incorporates the goals and steps contained in the SSPP as part of its ongoing use and stewardship of the historic Edison Environmental Center.



EPA Maintains this c. 1945 Historic Sign in a Maintenance Bay at the Edison Environmental Center as a Link to the Property's History

#### VI. CONCLUSION

To maintain leadership in environmental protection, the EPA must lead by example. Agency facilities, both new and existing, should serve as models for a healthy workplace with minimal environmental impacts. To achieve this goal, the EPA utilizes both innovative, state-of-the-art technologies and a holistic approach to design, construction, renovation, and use.

The EPA currently owns one historic property: the Edison Environmental Center. This historic resource is maintained in accordance with its HRMP and the EPA's overall SSPP. While the needs for safety and security at this facility preclude most public partnerships for its protection and use, the EPA continues to explore partnerships that can adhere to the safety and security needs of the Edison Environmental Center. As its other facilities continue to age, the EPA is committed to identifying, protecting, and using any newly identified historic properties in a sustainable manner that fit both the agency's mission and its leadership role in environmental protection.

#### LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
AEAMB	Architecture, Engineering, and Assessment Management Branch
CAA	Clean Air Act
CERFA	Community Environmental Response Facilitation Act
CFR	Code of Federal Regulations
CGP	Construction General Permit
CWSRF	Clean Water State Revolving Fund
DOT	U.S. Department of Transportation
DWSRF	Drinking Water State Revolving Fund
EDDP	Environmental Due Diligence Process
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FMS	Facilities Management System
FMSD	Facilities Management and Services Division
FPO	Federal Preservation Officer
GSA	U.S. General Services Administration
HABS/HAER	Historic American Buildings Survey/Historic American Engineering Record
HRMP	Historic Resources Management Plan
HUD	U.S. Department of Housing and Urban Development
LEED	Leadership in Energy and Environmental Design
MOA	Memorandum of Agreement
MSGP	Multi-Sector General Permit
National Register	National Register of Historic Places
NCD	NEPA Compliance Division
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
OARM	Office of Administration and Resources Management
OECA	Office Enforcement and Compliance Assurance
OFA	Office of Federal Activities
POC	Point of Contact
ROE	Report of Excess
SHPO	State Historic Preservation Officer
SLATE	Strategic Lease Asset Tracking Enterprise
SSPP	Strategic Sustainability Performance Plan
U.S.C.	United States Code