

Preserve America

Section 3 Progress Report



South Bronx Job Corps Center: 1771 Andrews Avenue, Bronx, NY 10453. Built 1908

Department of Labor Report

September 2020

**“PRESERVE AMERICA” SECTION 3
DEPARTMENT OF LABOR (DOL)
REPORT – SEPTEMBER 2020**

I. IDENTIFYING HISTORIC PROPERTIES

1. *Building upon previous Section 3 reports, have your identification methods changed during this reporting period? Approximately what total percentage or portion of inventory has now been surveyed and evaluated for the National Register, and does this represent an increase from your agency’s 2017 progress report?*

The U.S. Department of Labor (DOL) had surveyed and evaluated approximately three percent of the DOL inventory for potential National Register listing. DOL historic property identification methods have not changed from the previous years. Although no new historic properties have been identified in the past three years, DOL has been keeping a tab on assets over 50 years old, and/or on any other assets which may seem to meet other qualification criteria for listing on the NRHP, but for which a Determination of Eligibility study (DOE) had not been performed. In such cases, these assets would be assigned the historic identifier “Candidate”, as a place holder until eligibility is confirmed through a DOE.

- *What sources of digital information about the location of historic properties does your agency use? Is the information internal to the agency, managed by a State Historic Preservation Office or other state agency, shared, or from another source? In what aspect of your agency’s preservation work is geospatial information about historic properties most used?*

DOL maintains an internal digital database inventory of all its properties and their historic status with respect to NRHP eligibility and/or current listing. Information is shared with local jurisdictions during Section 106 consultations. DOL employs the use of geospatial mapping and may use drone footage to investigate, document, and record historical information about its properties.

2. *Has your agency implemented any policies that promote awareness and identification of historic properties over the last three years?*

In full compliance with the National Historic Preservation Act (NHPA) of 1966 and 36 CFR Part 800, DOL’s policy is to preserve and protect all historic properties under its jurisdiction. To ensure this, all properties are subject to a preliminary evaluation and are assigned one of the six Historic Identifiers, based on the National Register evaluation criteria. Prior to funding an undertaking, DOL, in consultation with the State Historic Preservation Officer (SHPO), conducts determination of eligibility studies to either identify or re-evaluate known historic properties. Properties which appear to meet the guidelines for listing on the NRHP, for which a determination of eligibility has not been made,

are designated as “Candidate” for listing. Undertakings for “Candidate” properties are also submitted to the SHPO for review. For the past three years, historic property identification was completed in the context of Section 106 for specific undertakings and not for unspecified planning needs (“Section 110 Surveys”).

- *Describe any new policies, or new benchmarks or performance measures instituted to meet existing requirements.*

DOL performs approximately 40 facility surveys per year (once every three years for each Job Corps campus and Mine Safety and Health Administration (MSHA) facility) to collect facility data. The updated facility survey reports are released every quarter. Following the facility survey, the DOL develops short and long term projects. Some of these projects could affect properties which, although yet not-evaluated, may seem to meet the criteria for listing on the National Register. In this case, prior to funding a proposed undertaking, DOL performs a determination of eligibility study to confirm the presence (or absence) of historic properties on site, and submits the report to the SHPO for concurrence with its findings.

DOL maintains a property registration database in the Engineering Support Contractor’s Information System (ESCIS). As new buildings come of age, and when a new undertaking affecting these buildings is proposed, the subject buildings are evaluated for eligibility for listing on the NRHP. When new historic properties are identified, they are assigned historic identifiers. The total number of “Not-evaluated” assets is then decreased by the number of the new listings. Within the past three years, 3 Historic properties were identified.

- *Federal agencies are encouraged to share information about whether evaluation of the effectiveness of existing agency policies, procedures, and guidelines that promote awareness and identification of historic properties has led to improvements during the reporting period or planned updates not yet implemented.*

DOL has continued to use effective, established policies and procedures that define requirements, responsibilities and processes for compliance with cultural resources management, as required by law.

With respect to the identification of historic properties, DOL’s policy has been, in the absence of a formal DOE study, to treat any property aged 50 years or older as “Candidate” for eligibility listing on the NRHP. When a proposed undertaking involves a property aged 50 years or older, DOL initiates Section 106 Consultation with the State SHPO to obtain concurrence with a determination of ‘No Adverse Effect’ caused by the proposed undertaking to the respective State’s

cultural resources. In some instances, when SHPO stipulations have to be met, consultation continues throughout the life of the project until those stipulations are satisfied and SHPO concurrence is obtained. This policy has been successful in the identification of historical properties (previously unknown), and in the preservation of the State cultural heritage from project inception through completion.

For the last three (3) years, estimate the portion (percentage) of historic property identification completed in the context of Section 106 for specific undertakings and programs, versus that completed for unspecified planning needs (“Section 110 surveys”).

In the last three years, 100 percent of the historic property identification performed by DOL was completed in the context of Section 106 for specific undertakings.

3. *How has your agency employed partnerships (with federal or non-federal partners) to assist in the identification and evaluation of historic properties over the last three years?*

DOL consults with SHPOs, Indian tribes, Native Hawaiian organizations (NHOs), professional societies, and other groups for the identification and evaluation of historic properties. Consulting helped DOL in identifying, evaluating, and maintaining its historic properties and executing projects while preserving and protecting related historic properties.

- *Have any partnerships involved the collection, exchange, or co-management of geospatial data about historic properties in your inventory? If so, please briefly describe the partner(s) and protocol for data transfer and long-term data management. Is the geospatial data accessible to others outside your agency?*

No

II. PROTECTING HISTORIC PROPERTIES

4. *Have the programs and procedures your agency has in place to protect historic properties, including compliance with Sections 106 (54 U.S.C. 306108), 110 (54 U.S.C. 306101-306107 and 306109-306114), and 111 (54 U.S.C. 306121-306122) of NHPA, changed over the reporting period in ways that benefit historic properties?*

DOL has continued to use established policies and procedures that define requirements, responsibilities and processes for compliance with cultural resources management, as required by law.

Prior to proposing an undertaking affecting any “Listed,” “Contributing,” “Eligible,” “In/Pending,” or “Candidate” property and/or any other property or heritage asset which may meet the eligibility criteria for listing on the National

Register DOL consults with the SHPO and other stakeholders. If a determination of an adverse effect to a historic property is made, consultation with the SHPO and other stakeholders continues until the adverse effect is eliminated and/or mitigated.

- *How has the number of full-time cultural resource professionals in your agency assigned to help the agency fulfill its responsibilities under the NHPA changed over the last three years?*

The number of full-time cultural resource professionals in DOL has not changed over the last three years.

- *Has the distribution of responsibilities to federal agency employees, contractors, and applicants for compliance with Sections 106, 110, and 111 changed over the last three years?*

The distribution of responsibilities has not changed in DOL over the last three years.

5. *How has your agency employed partnerships to assist in the protection of historic properties?*

DOL does not partner with groups such as friends groups, Preserver America Stewards, colleges or universities, or other similar organizations in the protection of historic properties.

6. *How has your agency used program alternatives such as Programmatic Agreements, Program Comments, and other tools to identify, manage, and protect your agency's historic properties over the last three years?*

DOL is open to exercise this option in such cases where this type of agreement is deemed to be a more effective approach. To date, this type of agreement has not been investigated or implemented.

III. USING HISTORIC PROPERTIES

7. *How do your agency's historic federal properties contribute to local communities and their economies, and how have their contributions changed over the reporting period?*

Within DOL, the 123 active Job Corps Centers, which may be located at historic federal properties, provide employment for training staff while providing students with specific skill sets tailored for the local economic needs.

- *Has consideration of local economic development in your asset planning changed over the last three years? If so, how?*

DOL properties are used exclusively for DOL programs. However, in establishing the vocational profile of a Job Corps Center consideration is given to local market conditions. Therefore, DOL ensures that the proper accommodations are made to serve the training needs to support the local industries. A core mission of the DOL is the ability to find careers and place the graduating students into the market place. By the very nature of the Job Corps program, local economies across the United States and Puerto Rico receive significant support from the 123 active Job Corps Centers' use of local labor, goods, and services.

- *Does your agency use historic properties to foster heritage tourism, when consistent with agency mission? If so, please describe any new heritage tourism efforts during the reporting period and whether they include public access to historic properties.*

DOL programs function in a secure environment which precludes public access to the site by outside visitors. Social media has not been used to promote heritage tourism. Instead, DOL has used social media to advocate awareness of the historic sites under its jurisdiction and, as such, has compiled recordation drawings and historic narratives for four of its centers (Edison Job Corps Center, St. Louis Job Corps Center, Mississippi Job Corps Center, and Hubert H. Humphrey Job Corps Center). These documents will be made available to the public in hard copy or electronic format at the local public library or posted on a dedicated website.

- 8. *What other laws, regulations, or requirements (other than the NHPA) most directly affect your agency's strategies to protect and use historic properties? What factors have influenced agency decision making on the continued use or re-use of historic properties during the last three years?***

DOL treats any of its property over 50 years old as potentially historic and follows NHPA requirements for SHPO coordination when undertaking any repair, renovation, restoration, or demolition project.

- *What factors are considered in agency decisions about disposing of or retaining historic properties?*

When DOL evaluates its property for disposal, DOL follows the General Services Administration's (GSA) Excess Real Property Due Diligence Checklist, and specifically the sections regarding Historic, Archeological and Cultural Resources.

For retaining historic properties, DOL maintains all historic properties within its inventory and consults with the local SHPO before any undertaking that may have an impact to the historical integrity of the property.

9. *Does your agency use, or has it considered using, Section 111 (now 54 U.S.C. § 306121) of the NHPA or other authorities to lease or exchange historic properties?*

No

- *Does your agency have protocols to identify historic properties that are available for transfer, lease, or sale?*

The GSA is DOL's exclusive agent for the disposition of owned real property when the property is excess to DOL's needs.

- *Are there obstacles to your agency using Section 111 or other authorities to enable the continued use of historic properties in your inventory?*

N/A

- *Does your agency generally retain the proceeds from Section 111 leases for the purposes of managing historic properties in the agency's inventory? Have these proceeds increased in the last three years?*

N/A

IV. SUCSESSES, OPPORTUNITIES, AND CHALLENGES

10. *Provide specific examples of major successes, opportunities, and/or challenges your agency has experienced in identifying, protecting, or using historic properties during the past three years.*

Identifying historic properties over the past three (3) years.

Below, are examples of the most challenging but also successful undertakings over the past three years:

- a) The former South High School (at present, Building 1, at the Gerald R. Ford Job Corps Center, located in Grand Rapids, MI) was constructed in 1915. In 1931, the school expanded with the addition of the Auditorium and Gymnasium Buildings. As one of its most famous alumni, President Gerald R. Ford, graduated from the high school in 1931. The South High School closed in 1968, when it became the South Middle School until it closed for the last time in 1979. In 1982, it re-opened as the Gerald R. Ford Job Corps Center.

Construction of the South High School complex was complete by 1931. During the time the future President attended the South High School, he had not attained historic significance as a public figure. His prominence came much later in his life as the U.S. House of Representatives for Michigan's 5th Congressional District, Vice-President, and President of the United States). For this reason in 1982, DOL did not regard the three building complex eligible for listing on the NRHP under Criterion B. Additionally, because over the years the buildings suffered loss of architectural integrity, DOL did not consider Criterion C as an evaluation factor for eligibility. However, DOL's policy for any undertaking is that when at least one eligibility Criterion applies (e.g. buildings over 50 year old), DOL is to initiate Section 106 Consultation. When an exterior renovation project affecting the Auditorium Building, was proposed, DOL contacted MI-SHPO to initiate Section 106 Consultation, and, based on the assumptions listed above, requested concurrence with a determination of no adverse effect caused by the undertaking to historic properties in the State of Michigan (no historic properties affected). MI-SHPO disagreed with DOL hypothesis of lost architectural integrity, and deemed Criterion C applicable, even though a formal determination of eligibility had not been performed. MI-SHPO requested more information and project specific details. In the end, through additional consultation, concurrence with the project's approach was obtained, and the work was successfully completed.

- b) A former tuberculosis Hospital, the main Building at Dayton Job Corps Center was constructed in 1921. The hospital, opened in 1923, with a capacity of 250 beds. University of Dayton took over the building in 1960 and used it for its West campus. The building became a Job Corps facility in 1978. The campus is located south of the Central Branch National Home for Disabled Volunteer Soldiers National Register property boundary.

Because of the extensive exterior envelope deterioration which occurred over the years, DOL proposed a project to renovate Building 1, consisting in structural and masonry repairs. At the time, DOL did not have any documentation on the historic status of this building and contacted OH-SHPO to obtain more information. Indeed, OH-SPHO provided a copy of the 1989 listing of the extant building (Building 1) to the Ohio Historic Inventory.

As a result, in 2017, Building 1 was assigned the historic status 'Listed' in the DOL database. During the same time, DOL initiated Section 106 Consultation with the OH-SHPO, and obtained concurrence with a determination of no adverse effect caused by the undertaking to historic properties in the State of Ohio (no historic properties affected).

- c) Springdale Job Corps College located on 80 acres of land in Troutdale, Oregon, was activated as a Job Corps Facility in 1970 when it was acquired

by DOL from the Franciscan Fathers of California. Eight extant buildings existed on campus at the time of the property transfer; ten others were built during DOL tenure. DOL has proposed an undertaking to repair the deteriorated masonry of Buildings 6 and 7 (built in 1941). Aside from age, these buildings did not appear to meet the Secretary of Interior criteria for listing on the NRHP. However, in the absence of a Determination of Eligibility study (DOE), in 2019 the two buildings were assigned the historic identifier “Candidate”. Over the years, the masonry facade and masonry chimneys on both buildings have deteriorated, due to normal weathering conditions and age. DOL had proposed to renovate the exterior envelope of the two buildings in keeping with the Secretary of Interior’s Standards for the Treatment of Historic Properties, and initiated Section 106 Consultation with OR-SHPO, requesting concurrence with a determination of no adverse effect caused by the undertaking to historic properties in the State of Oregon (no historic properties affected).

Based on the project information provided, OR-SHPO concurred that the proposed project actions met the Interior’s Standards for the Treatment of Historic Properties. However, OR-SHPO indicated that concurrence with a no adverse effect to historic properties would only be granted if Buildings 6 & 7 were treated as eligible, and recommended that DOL work with OR-SHPO to complete a survey and inventory of the Springdale Job Corps Center to determine if the two properties were eligible to be managed per Section 110 of the National Historic Preservation Act of 1966, as amended. DOL is planning to perform a DOE study as requested by the OR-SHPO.

Protecting historic properties over the past three (3) years.

Below, are examples of the most challenging but also successful undertakings over the past three years:

- a) The former ‘Our Lady of Mercy High School’, located on 1.75 acres of land in Cincinnati, Ohio was constructed in 1897. It was activated as Cincinnati Job Corps Center in 1972. Main Building 1 at the Cincinnati Job Corps Center was listed on the National Register of Historic Places in 1980 (NR System ID: 80003070; register information obtained from the OH-SHPO). Building 1 is assigned the historic identifier “Listed” in DOL data base.

Main Building 1 has four stories above ground supported by multi-wythe masonry bearing walls clad with original brick on the upper floors and gray stone on the first floor. The upper roofs of the building are covered with original slate and have copper lined, wood framed gutters. DOL proposed an undertaking to repair the exterior envelope which suffered various degrees of damage over the years. The proposed rehabilitation project includes replacement of the existing

split AC/heating system (including the removal of through window units) with a ductless, slim-profile VRF (variable refrigerant flow) system in the third floor dormitory space; replacement/repair of wood box gutters; replacement of metal gutters; repointing of sections of brick walls with failed mortar joints; and replacement of (73) non-historic wood frame windows on the third floor.

DOL initiated Section 106 Consultation with the OH-SHPO, to obtain concurrence with a determination of no adverse effect caused by the undertaking to historic properties in the State of Ohio (no historic properties adversely affected). The project scope of work specifies all exterior replacements and/or repairs to be made in kind. HVAC work would not impact interior features of the property or be visible from street level. The OH-SHPO reviewed the proposed project information provided by DOL, and deemed that it was in keeping with the Secretary of the Interior's Standards for Rehabilitation.

The OH-SHPO concluded that the work as proposed would not impact the significance and integrity of the Cincinnati Job Corps Center in a way that would alter its National Register status, therefore agreed that the work as proposed will have no adverse effect on historic properties. The project is currently under design.

- b) Three extant Center buildings (Main Building 1, Gymnasium Building 2 and Cafeteria Building 5), at Gulfport Job Corps Center were constructed in 1954 as part of the 33rd Avenue High School. These buildings were determined to be eligible for listing in the National Register of Historic Places (NRHP), but in 2005, after extensive damage caused by Hurricane Katrina, they were abandoned and sat vacant, incurring further damage in the intervening years. DOL has proposed a project which aims to reconstruct the Center in a manner which preserves three existing street facing facades on both the Main Building 1 (two facades) and the Gymnasium Building 2 (one façade). The facades which are proposed to be retained will be integrated into the design of two new buildings, which are anticipated to provide the administration, education, and recreation functions for the new facility.

As required by the Memorandum of Agreement (MOA) signed by DOL in 2017, DOL had to prepare a Level II Historic American Building Survey (HABS), conduct live interviews and write a historic narrative, and develop a historic exhibit, in partnership with the Advisory Council on Historic Preservation (ACHP). The ACHP served as the primary historic preservation oriented participant on the project, since the Mississippi Department of Archives and History chose to withdraw from the Section 106 consultation in April 2017.

The design for the campus redevelopment, the HABS recordation, the interviews and the design of the exhibit are currently in progress.

Using historic properties over the past three (3) years.

Below, are examples of the most challenging but also successful undertakings over the past three years:

- a) In 2017, DOL completed a phased renovation of the Main Building (Building No. 1) at the South Bronx Job Corps Center. The work consisted of mechanical, electrical and architectural upgrades throughout the building, and major restoration and renovation to the exterior façade. Building 1 is a Historic Landmark by the New York City Landmark Preservation Commission. DOL worked closely with the NY-SHPO office to coordinate design and construction requirements in keeping with the historical integrity of the building. Upon completion of the work, the New York Landmarks Conservancy's Lucy G. Moses Awards Committee, awarded the project a Preservation Project Award for 2017.
- b) The Edison Job Corps Center, formerly World War II Joyce Kilmer Army Base, has been designated as a historic district. To mitigate the adverse effect of the proposed undertaking to demolish three extant buildings on campus, on July 15, 2013, DOL entered into an Memorandum of Agreement (MOA) with the NJ-SHPO. In a letter dated September 8, 2016, the SHPO acknowledged that all the terms outlined in the MOA (historic narrative, photographs, HABS III recordation, interpretive signage design) had been fully met and that DOL had no further obligations.

Since then, DOL has completed the demolition of Buildings 801, 806 and fabricated and installed the interpretive signage. That would enable students, visitors and staff to learn of this important period of American history, the war effort and the sacrifice during that time.

- c) The Westover Job Corps Center is located on 43 acres of land within the Chicopee, Massachusetts city limits, 3.5 miles north of downtown Springfield, Massachusetts. The Center was activated for Job Corps utilization in 1980. The original buildings on site were constructed in 1939 to serve the Westover Air Force Base. After the Nazi invasion of Poland in 1939, FDR authorized the Army Corps of Engineers (ACOE) to construct the Westover Air Field, which became the largest military air facility at the time. In 1960, the base took the name of Major General Oscar Westover, who at the time was Chief of the ACOE. Major General Oscar Westover is accredited with the creation of the US Air Force as a separate branch of the military. During the Cold War, Westover became the main launch center for the Berlin Airlift during the Soviet blockade.

The Center's three dormitories, Harris Hall Building 5902, Singletary Hall Building 5903 and Walker Hall Building 5908, were constructed in 1955. The original windows in these buildings were single pane, aluminum windows

with poor weather-stripping, resulting in leaks through wind-driven rain, and cold air infiltration. The leaks and heat loss allowed ice to form on the inside face of the windows in winter. Living conditions in dormitory rooms had shifted increasingly outside comfort parameters over time as a direct result of the windows' progressive deterioration. DOL had proposed a building-wide program of window replacements throughout all three dormitory buildings. The program proposed to replace the existing double-hung, aluminum framed, single-glazed windows with energy-efficient units, and to match the original units' appearance and configuration in order to retain the overall architectural character of each building.

Other than being over 50 years of age, the buildings do not appear to meet the Secretary of Interior criteria for National Register eligibility. These buildings were not part of the original campus design, and no historic records of this or of any of the other 1955 era buildings could be found on the Massachusetts Historic Commission (MHC) archival site. However, in the absence of a Determination of Eligibility study (DOE), and in keeping with its policy to protect potential historic structures, DOL initiated Section 106 Consultation with MA-SHPO, requesting concurrence with a determination of no adverse effect caused by the undertaking to historic properties in the State of Massachusetts (no historic properties affected).

A letter of concurrence with no adverse effect was obtained, and the replacement window project is currently under way. The project will create much improved conditions inside the buildings and will also greatly improve the appearance of the buildings and campus overall.