



U. S. Department of Transportation Maritime Administration

Progress Report

Executive Order 13287 "Preserve America"

Section 3: Reporting Progress on the Identification, Protection, and Use of Federal Historic Properties

September 29, 2023

Introduction

This report fulfills the Maritime Administration's (MARAD) requirements under Section 3(c) of Executive Order (EO) 13287, "Preserve America" by providing an update on the state of MARAD's historic properties and its progress over the last three years in meeting the objectives of EO 13287. MARAD's historic properties include one historic district listed in the National Register of Historic Places (NRHP), one building listed in the NRHP, and one National Historic Landmark (NHL). These historic assets are 26% of MARAD's total properties.

During the last three years, one warehouse at a MARAD-owned fleet site in Beaumont, TX was reviewed for NHRP eligibility prior to alterations to the building and was determined ineligible. The Texas State Historic Preservation Officer (SHPO) concurred. In addition, four residential buildings at the United States Merchant Marine Academy (USMMA) in Kings Point, NY were surveyed and determined, in consultation with the New York SHPO, not eligible for listing in the NRHP.

Funds were allocated and a contract awarded in 2023 to conduct a complete historical context study of National Defense Reserve Fleet (NDRF) sites, present and past. This study will provide a broad historical context and a better understanding of the properties and how they relate to National and MARAD Maritime History. The study will assist MARAD in the review required under Section 106 the National Historic Preservation Act (54 U.S.C. § 300101) (NHPA) should MARAD contemplate a change to the facility.

Currently, most of MARAD's Section 106 planning and compliance covers undertakings by MARAD through grants awarded from funds in the Bipartisan Infrastructure Law; reviewing, managing, and consulting on more than 120 projects in the last year alone. MARAD also complies with Section 106 for undertakings occurring at its three historic properties and three National Defense Reserve Fleet sites as well.

In addition, MARAD continues to conduct historical assessments on surplus NDRF ships. In the last three years, 22 ships were assessed and determined, with SHPO concurrence, not eligible for the NRHP. MARAD curates over 7000 artifacts of significance to MARAD history and works to share these with the public via loans and transfers to non-profit entities. Only a small percentage of the current Section 106 requirements cover real property owned by MARAD.

U. S. Merchant Marine Academy Historic District and William Barstow Mansion

The USMMA, located in Kings Point, New York, contains two historic properties listed in the NRHP: USMMA Historic District (HD) and the William Barstow Mansion. USMMA HD encompasses 42-acres and is the main core of the campus, featuring 38 contributing and 10 non-contributing buildings, structures, and objects. The district is significant for its early-20th century Gold Coast residences, with its centerpiece being Wiley Hall, and for its Classical style campus designed by Alfred Hopkins and Associates in the 1940s with additional buildings constructed in the 1960s. The William Barstow Mansion, which houses the American Merchant Marine Museum (AMMM), is located outside the district on the McNulty Campus, and includes the mansion and garage (Quarters O). This building is significant as an early-20th century Gold Coast Mansion owned by a noted industrialist, William Barstow. In addition to serving as a museum, the William Barstow Mansion is occasionally used for classes and lectures. Approximately 5,000 people visit the AMMM annually, exclusive of midshipmen, faculty, and staff. Approximately one-quarter of visitors are family members of prospective or current midshipmen.



Wiley Hall, former Bendel/Chrysler mansion and current USMMA administration building.

These resources have been documented in NRHP Nomination forms prepared for both properties, as well as number of reports, including:

- *Character-Defining Features of Contributing Buildings and Structures in the United States Merchant Marine Academy Historic District*
- *Landscape Management Plan for USMMA*
- *USMMA HD Property Maintenance and Repair Manual*
- *United States Merchant Marine Academy Final Cultural Resources Report August 2019-April 2022.*

Because USMMA conducts routine undertakings related to the operation, maintenance, and development of the facility that involve similar and repetitive actions which have the potential to affect historic properties under Section 106 of the NHPA, a program specific Programmatic Agreement (PA) was developed between USMMA, NYSHPO, and the Advisory Council on Historic Preservation (ACHP) to assist in evaluating operations, maintenance, and development activities at USMMA. Stipulations in the PA were created to improve consistency, consultation, and accountability in fulfilling USMMA's responsibilities in compliance with Section 106. The PA was executed in April 2022.

As USMMA is a working facility and its buildings require regular maintenance and sometimes repair, a key part of the PA was to allow certain undertakings to be considered streamlined activities that would not require Section 106 consultation. Such undertakings would include routine maintenance and repair on noncontributing buildings, structures, and objects within the district, and properties outside the district boundaries. Routine maintenance and repair inside noncontributing buildings or inside contributing buildings on attributes that were not identified as character-defining would also be streamlined if no ground disturbance or associated exterior work such as penetration of vents or piping took place.

Select routine maintenance and repair of character-defining exterior or interior spaces may be also streamlined if it would be done in accordance with recommended procedures in the Secretary of the Interior Standards for the Treatment of Historic Properties developed by the National Park Service. These standards would include new publications of the National Park Service. These undertakings may include in-kind repair and replacement using similar materials, textures, and installation techniques to retain the building's unique flavor. Explicit rules for each situation were included in the PA stipulations.

All work on the campus must be shared with the Cultural Resources Manager (CRM), who will determine if the streamlined review process applies, or if Section 106 consultation is required. In addition, it should be noted that staff of the Department of Public Works (DPW) routinely do maintenance and repair throughout the campus and minor repairs such as replacing leaking faucets, light fixtures, plaster repair, painting, etc., are not typically reviewed.

As outlined in the PA, a streamlined review process criteria ensured that many of the projects would have no effect on historic resources and would not require NYSHPO review. Over the past three years, 19 projects met the streamlined review criteria.

The Academy also had several projects over the past three years that did not meet the criteria for the streamlined review process; Section 106 consultation was therefore required.

In 2020, the Academy initiated Section 106 consultation on the construction of a new Midshipmen Activities Center. This project will involve the demolition of Melville Hall and Land Hall and the construction of a new student center. Both buildings proposed for demolition contribute to the historic district. The SHPO had requested additional information from the Academy, including an alternatives analysis study. However, the project was subsequently put on hold. If this project is revived, the CRM will work with the Capital Improvement Program (CIP) and the SHPO to continue consultation to avoid, minimize, or mitigate the adverse effects of this project.

Also in 2020, the Academy determined in consultation with SHPO that three projects would have no adverse effects. Two of these related to security upgrades, including lighting and fencing replacement throughout the campus. One involved modification to the Fitch Building, a contributing resource to the historic district. The project was subsequently put on hold, and if it is revived in the future, the CRM will review any drawings and reinitiate consultation with SHPO if there are any changes from the designs previously reviewed by SHPO.

In 2021, an amendment to a 2017 Memorandum of Agreement (MOA) for the Crowninshield/Cressy Pier Replacement was executed. The amendment was required due to changes in the project which would reconstruct the building on the pier, rather than replace the building and pier with a wave screen. Furthermore, the project would be phased, with final plans to be developed for the building later. The amendment added

the stipulation that the Academy is required to submit the plans for the new building before they are finalized. This project is ongoing.

Also in 2021, the Academy initiated Section 106 consultation with the SHPO for four projects that were determined to have no adverse effects. These include modifications to an earlier project from 2017 to upgrade the electrical switchgear at the campus. The changes to the plans included the installation of a steel enclosure for the switchgear within the historic district. Wi-Fi was also installed within Ackerman Auditorium, which is a character-defining interior space within the district. Select storm doors at Wiley Hall, a contributing building within the district, were replaced in-kind. Finally, wood piles within the Hague Basin, adjacent to Mallery Pier, a contributing resource to the district, were replaced in-kind.

In 2022, the Academy initiated Section 106 consultation with SHPO for three projects that were determined to have no adverse effects. These include repairs to a garage at Fulton Hall, a contributing resource to the district. This work was necessary after a fire damaged the garage, including its non-historic windows and garage door. All elements were replaced in-kind. The entrance to Quarters A, a contributing resource to the district, was repaired and elements replaced in-kind. Upgrades were also made to Vickery Gate, the main entrance to the Academy, which is a contributing resource to the district. The work included replacing the non-historic guard booth, installing vehicle and pedestrian gates, and installing bollards.

There were no Section 106 consultations for any projects in 2023.



William Barstow Mansion and current AMMM Museum

Master Plan for Future Development

In July 2020, the Academy created a Facilities *Master Plan*, which identifies near-term (0-5 years), mid-term (6-10 years), and long-term (11+ years) projects. Section 106 consultation has been initiated, and in some cases, completed for a number of these projects. Specifically, the new student center and Vickery Gate upgrades were included in the Master Plan. An updated plan is expected in 2024.

In addition to the above-noted projects, in February 2021, USMMA initiated consultation with NYSHPO to survey and evaluate three buildings which had never been formally evaluated to determine if they may be eligible for listing in the NRHP. These included Quarters E&F, Quarters L, and Quarters M. MARAD determined that these three buildings were not eligible for listing in the NRHP in large part due to a lack of integrity (i.e., unimpaired ability to convey its historical significance), and the NYSHPO concurred with this determination.

USMMA also acquired 307 Steamboat Road in mid-2021, one of two private properties within the campus boundary, resulting in government ownership of nearly all campus property. This was included in USMMA Facilities Master Plan as a short-term project. In January 2022, USMMA initiated consultation with the NYSHPO to survey and evaluate this building to determine if it may be eligible for listing in the NRHP. The evaluation concluded that 307 Steamboat Road was not eligible for listing in the NRHP due a lack of integrity and the NYSHPO concurred with this determination. Therefore, USMMA has now formally evaluated all buildings over 50 years old within the campus.

Between August 2019 through September 2023, no archaeological discoveries were made at USMMA.

National Historic Landmark Nuclear Ship (NS) *Savannah*

MARAD owns the Department of Transportation's (DOT) only directly managed and maintained NHL. N. S. *Savannah*, the world's first nuclear-powered merchant ship, was designed and constructed by MARAD in the late 1950s as a signature element of President Eisenhower's *Atoms for Peace* initiative. The nuclear merchant ship program was authorized in 1956 as a joint program of MARAD and the former Atomic Energy Commission (AEC). *Savannah* was placed into service in 1962 and operated until mid-1970. The program was ended after successfully completing its goals and objectives. The ship's used nuclear fuel was removed in 1971, and the plant was rendered permanently inoperable and placed into a condition of protective storage in 1976. *Savannah* was leased to the State of South Carolina for museum service from 1981 to 1994, during which it was listed on the NRHP (1983) and designated as an NHL (1991). When museum operations ended, *Savannah* was returned to MARAD custody for continued protective storage. Since 2008, *Savannah* has been maintained by MARAD at a commercial layberth facility in Baltimore, MD. The ship is opened periodically for public access, group tours and events, and inter-governmental training exercises. Annual public access resumed in 2022 after having been suspended during the COVID-19 pandemic/national emergency in 2020 and 2021.



Nuclear Ship *Savannah*.

N. S. *Savannah* Stewardship

Savannah's nuclear facilities are licensed and inspected by the U. S. Nuclear Regulatory Commission (NRC), as successor to the AEC. MARAD meets its primary NHL stewardship obligations while acting within the broad framework of its NRC license. *Savannah's* hull is the licensed site boundary and the ship itself is the principal structure that contained and protected the nuclear facilities within. The ship provides the support infrastructure for the personnel who maintain and administer the license, and consequently the ship is kept in good, clean material condition without water ingress or other forms of environmental deterioration. Repairs and maintenance are performed using traditional and customary marine techniques and materials appropriate for a ship of *Savannah's* vintage. Renovations employ like-materials wherever possible (e. g., upholstery or wall coverings). Original fabric samples have been retained, and spaces photographically documented, prior to work being performed.



The preserved viewshed inside the Containment Vessel, as viewed from the entrance portal. At left is the starboard Steam Generator; in the center is the Neutron Shield Tank outer annulus (reactor was in the center); at right is the Pressurizer shell.

The ship's facility license was originally issued by the AEC in 1965 and will continue in effect until terminated after completing the NRC decommissioning process. After the license is terminated, MARAD may dispose of the ship although a long-term preservation outcome is being explored.

The combined decommissioning and disposition were identified as an Undertaking with an adverse effect under the NHPA of 1966, as amended, and after lengthy consultation beginning formally in 2018, a PA was executed in March 2023. Signatories to the PA are MARAD, NRC, the Maryland State Historic Preservation Officer (MDSHPO) and the ACHP. Because the eventual disposition is unknown at present, the PA established a Peer Review Group (PRG) composed of the PA signatories, concurring parties, and others. The PRG is the mechanism by which consultation continues until the Undertaking is complete.



The Containment Vessel entrance portal. The exposed cross section of the collision boundary is preserved behind plexiglass. From left to right are the 25-inch-deep steel and redwood layer, followed by the ordinary concrete, ending with the CV three-inch steel shell.

N. S. *Savannah* Decommissioning

NRC licensing covers the complete facility lifecycle, from concept to end-of-life. Decommissioning is defined by the NRC as safely removing a facility or site from service and reducing residual radioactivity to a level that permits, in the case of *Savannah*, the release of the property for unrestricted use, and termination of the license.

Reducing residual radioactivity is essentially a process of controlled industrial dismantlement, which often returns a site to a near-unrestricted reuse condition. Wastes generated are segregated, packaged, transported, and disposed in appropriate offsite licensed repositories. Decommissioning begins with the permanent cessation of operations, which for *Savannah* was defined as the 1971 defueling operation. A licensee may employ a period of protective storage before dismantling the facility, provided that the license is terminated within sixty years of permanent cessation of operations. The dismantlement period is known as DECON. For landside facilities with large, licensed footprints, DECON typically makes use of available space and structures inside the site boundary to provide administrative and industrial infrastructure to support the project. MARAD understood early in its decommissioning planning that the clearest path to regulatory success was to emulate the process used for landside plants. In keeping with NRC license termination requirements, the *Savannah* decommissioning scope includes the dismantlement and disposal of most of the components, systems and equipment that make up the ship's nuclear power plant – a character defining feature of the NHL.

The NRC DECON-License Termination process, and the NHPA's requirement to minimize harm to NHLs are different. MARAD has been aware of this issue since decommissioning planning first began in earnest around 2003, and its project plans have always been guided by the following four principles:

- Wherever possible, decommissioning activities are undertaken in a manner that fosters future preservation;
- All dismantlement activities will use existing ship accesses to minimize impacts to adjacent structure;
- Whenever an option is presented or evaluated, the path that promotes preservation is preferred and;
- Opportunities to improve the ship concurrent with decommissioning are exercised.

As noted in the stewardship discussion, MARAD's primary focus is NRC license compliance; the principles, therefore, describe how landside DECON is performed on *Savannah*, with a preservation-conscious approach. For example, the first principle – *decommissioning activities are undertaken in a manner that fosters future preservation* – reflects MARAD's license requirement to maintain and use those original systems that have applicability during decommissioning, or to install replacement systems with similar function. MARAD deliberately decided to keep the decommissioning activities within the ship's hull as much as possible, and to keep additional infrastructure to the bare minimum. These were practical decisions; in the first case, it kept all activities within the NRC-licensed boundary¹, thus avoiding regulatory conflicts with other federal (e. g., U.S. Coast Guard), state and local entities that do not exist in landside DECON projects. In the second case, by keeping offsite (pierside) requirements to the minimum necessary for safe berthing, crane service, truck loading, and parking, MARAD avoided the great expense of a commercial shipyard as a decommissioning site.



N.S. *Savannah* Reactor Vessel removal, November 8, 2022

¹ The ship's hull is the NRC licensed site boundary. All activities within the boundary are under the sole cognizance of the NRC.

One result of these decisions was the necessity to adapt and convert the ship's interior volume for the temporary services required for decommissioning. The infrastructure built for these purposes is permanent, or semi-permanent, and can easily be adapted for other uses once DECON is complete and the license is terminated. In particular, the life safety and fire protection systems installed to protect decommissioning workers will suit any future use of the vessel in a preservation context. The remaining principles have similar nexuses with decommissioning and preservation objectives.

MARAD's 2017 and 2020 reports described renovations and modifications made to the ship, and also the 2019-2020 drydocking availability that, among other things, brought an opportunity to renew the impressed current cathodic protection system that covers the ship's hull structure. Modifications to support decommissioning operations were completed in 2021. In the period between 2020 and 2023, MARAD removed asbestos-containing insulation materials from the ship's engine room to support detailed radiological characterization surveys, after which the space was simply repainted. The renovations, modifications, and major maintenance projects, including the engine room, were carried out in consultation with the MDSHPO, NPS, and ACHP as required. No adverse effects were identified with these projects.

Ongoing consultation under the PA will continue to address decommissioning work, and especially the efforts made by MARAD to preserve signature elements of the nuclear power plant while meeting NRC radiological criteria for license termination. The focus of consultation, however, is shifting to the disposition of *Savannah*. The PA prescribes a deliberative process for considering disposition alternatives. MARAD anticipates that this work will be complete by the time of the 2026 Section 3 report.