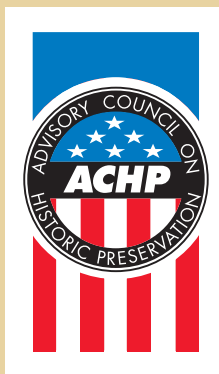


# IN A SPIRIT *of* STEWARDSHIP



A Report On Federal Historic Property Management  
2015



*Preserving America's Heritage*

An independent federal agency, the Advisory Council on Historic Preservation (ACHP) promotes the preservation, enhancement, and sustainable use of our nation's diverse historic resources and advises the President and Congress on national historic preservation policy. It also provides a forum for influencing federal activities, programs, and policies that affect historic properties. In addition, the ACHP has a key role in carrying out the Preserve America program.

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Front cover photography (left to right): Black Rock Lock and Canal, NY (USACE); Cathlapotle Pole House constructed in Ridgefield National Wildlife Refuge, WA (USFWS); and Space Shuttle in transit (NASA)

Back cover photography (left to right): RV *Polaris*, CA (USGS); students volunteer in an archaeological dig in a national park in the National Capital Region (NPS); the restored main stair balustrade in the Treasury Building, DC (TREAS); and the Westport Post Office, CT (Evan Kalish)

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## ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation	GAO	Government Accountability Office
AFRH	Armed Forces Retirement Home	GIS	Geographic Information System
ARRA	American Recovery and Reinvestment Act	GSA	General Services Administration
BIA	Bureau of Indian Affairs	HHS	Department of Health and Human Services
BLM	Bureau of Land Management	IHS	Indian Health Service
BOP	Federal Bureau of Prisons	LEED	Leadership in Energy and Environmental Design
BOR	Bureau of Reclamation	NASA	National Aeronautics and Space Administration
BRAC	Base Realignment and Closure	NEPA	National Environmental Policy Act
CBP	U.S. Customs and Border Protection	NHL	National Historic Landmark
CDC	U.S. Centers for Disease Control and Prevention	NHPA	National Historic Preservation Act
CEQ	Council on Environmental Quality	NIH	National Institutes of Health
CFR	Code of Federal Regulations	NOAA	National Oceanic and Atmospheric Administration
DHS	Department of Homeland Security	NPS	National Park Service
DOC	Department of Commerce	NRHP	National Register of Historic Places
DOD	Department of Defense	OMB	Office of Management and Budget
DOI	Department of the Interior	RPAC	Real Property Advisory Committee
DOS	Department of State	SHPO	State Historic Preservation Officer
DOT	Department of Transportation	SPO	Senior Policy Official
EO	Executive Order	Stat.	U.S. Statutes at Large
EUL	Enhanced Use Lease	TVA	Tennessee Valley Authority
FAA	Federal Aviation Administration	U.S.	United States of America
FDA	Food and Drug Administration	U.S.C.	Code of Laws of the United States of America
FEMA	Federal Emergency Management Agency	USACE	U.S. Army Corps of Engineers
FHWA	Federal Highway Administration	USCG	U.S. Coast Guard
FPO	Federal Preservation Officer	USGBC	U.S. Green Building Council
FRPC	Federal Real Property Council	USGS	U.S. Geological Survey
FRPP	Federal Real Property Profile	USPS	U.S. Postal Service
FS	U.S. Forest Service	VA	Department of Veterans Affairs
FWS	U.S. Fish and Wildlife Service		



MILFORD WAYNE  
DONALDSON, FAIA

Chairman, Advisory Council  
on Historic Preservation

February 17, 2015

## CHAIRMAN'S MESSAGE

In accordance with Executive Order 13287 "Preserve America," the Advisory Council on Historic Preservation (ACHP) is pleased to present its fourth triennial report on how well federal agencies manage the historic properties entrusted to their care on behalf of the American people. Federal agencies provided progress reports to the ACHP and the Secretary of the Interior in 2014. Based on these submissions and our interactions with federal agencies, the ACHP has developed findings and associated recommendations to advance the goals of the Executive Order and the National Historic Preservation Act.

The Preserve America Executive Order requires agencies to advance the protection, enhancement, and contemporary use of historic properties owned by the federal government. As agencies continue to work smarter and reduce the federal footprint to control costs, they have also found opportunities to optimize the use of historic properties to meet mission requirements, increase energy efficiency and sustainability, and promote economic development.

Federal agencies have used various tools to make productive use of historic properties, including outleasing and other cost sharing partnerships. Through outleases and enhanced use leases, federal agencies may ensure the long-term preservation of historic properties supported by non-federal investment. These approaches present an alternative to demolition and are often effective alternatives for the reuse of highly technical or scientific historic properties.

In their 2014 progress reports, agencies reported on the successful "green design" adaptive reuse and rehabilitation of federal historic buildings and structures. Creative design teams have proven that historic buildings and structures can become high-energy performers with investments in new technologies, making investment in rehabilitated historic buildings and structures federal dollars well-spent.

The ACHP is committed to actions that support the Administration goals of cost efficient, effective, sustainable, and resilient federal real property management. We are also committed to building a more inclusive preservation program, and ensuring that the diverse cultures of our nation, as well as our nation's young people, are well represented in historic preservation. We continue to encourage federal leadership and interest in the stewardship of historic properties in federal ownership and appreciate the attention given to this important report.





SALLY JEWELL

Secretary, Department of  
the Interior

February 17, 2015

## SECRETARY OF THE INTERIOR'S MESSAGE

Since President Lyndon Johnson signed the National Historic Preservation Act in 1966, stewardship of historic places has been part of the mission of every Federal agency. Across the country, Federal employees are working every day to meet the responsibility to be good managers of the many significant historical sites. Historic preservation programs, such as those managed by the Federal preservation offices within the Department of the Interior, ensure that places with historic and cultural significance are appropriately identified, evaluated, and protected.

The Department of the Interior sets the standards by which the qualities of preservation are measured and evaluated by Federal, state, tribal, and local communities and citizens. In concert with the National Register of Historic Places criteria, the Secretary of the Interior's Standards guide the practice of American historic preservation. More than 90,000 historic places representing approximately 1.6 million properties are listed on the National Register.

Federal historic preservation programs make civic, economic, and environmental sense. In addition to teaching our citizens about our great national journey, preservation generates many economic benefits, stimulating the creation of jobs and investments in local economies.

Long recognized for its contribution to environmental sustainability, historic preservation is now confronting the impact of climate change on cultural resources. This new challenge has prompted a renewed effort to meet our responsibilities to identify, evaluate, document, and nominate properties to the National Register of Historic Places.

The Federal agency reports show steady progress at identifying historic places as the first step in ensuring that accurate data about significant places are used in making decisions. However, improved accessibility of this information for other Federal, state, tribal, and local preservation offices is needed. At the Department of the Interior, we continue to work to make inventory systems compatible across the bureaus.

In the coming decades, our preservation efforts must become more relevant and inclusive of the many histories that make up the panorama of the American story. Since 2000, more than a dozen theme studies exploring the diversity of the American experience have been completed. Following the recently released report on American Latino heritage, we are now undertaking historical studies of women; Asian Americans and Pacific Islanders; and lesbian, gay, bisexual, and transgender Americans.

In 2016, Federal historic preservation programs will commemorate the 100th anniversary of the establishment of the National Park Service and the 50th anniversary of the passage of the National Historic Preservation Act. Both of these events offer opportunities to recognize how important the stewardship of our historic places and shared heritage is to the foundation of the American character and to recommit ourselves to these efforts.



## EXECUTIVE SUMMARY

This is the fourth triennial report to the President, required under Executive Order (EO) No. 13287, “Preserve America,” addressing the state of the federal government’s historic properties and their contribution to local economic development. EO 13287 reinforces the role of federal agencies as stewards of historic properties under their ownership and underscores the importance of federal agency efforts to inventory, protect, and use these properties. The EO emphasizes that historic properties are valuable assets to support agency missions, and federal investment in them may stimulate local economic development.

Information in this report is derived primarily from the federal agency progress reports submitted to the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior in September 2014. Agency reports focused on progress made in identifying, protecting, and using historic properties in federal ownership. Federal agencies continue to provide creative examples of historic properties adaptively reused and rehabilitated to be energy efficient and sustainable, as well as historic properties leased or disposed to parties responsible for their preservation. The ACHP is pleased to report that 21 federal agencies submitted reports on or soon after the September 30, 2014, deadline. In addition to the review of the agency progress reports, the findings and recommendations are also informed by the ACHP’s extensive interaction with federal agencies and preservation partners on various initiatives over the last three years.

In assessing the progress federal agencies have made in the last three years, the ACHP made four key findings about the current state of federal historic property stewardship:

1. Integrating historic property stewardship in federal agency strategic planning for the consolidation and realignment of real property portfolios improves historic preservation outcomes.
2. Agencies would benefit from examples of creative solutions developed for “green design” rehabilitation projects of federal historic buildings and structures.
3. Systemic efforts by federal agencies to identify and prepare for the threats of climate change and to maximize the resilience of historic properties are important stewardship responsibilities.
4. Agency-wide historic preservation policies and leadership commitment to their implementation create a culture of stewardship, facilitate the allocation of resources to meet responsibilities, and improve preservation outcomes.

The ACHP will work to address these findings through its assistance to federal agencies in the Section 106 review process and other daily business and also by implementing specific commitments, including the following:

- » Continue to provide guidance and success stories demonstrating how highly technical and scientific historic properties are adaptively reused by federal agencies.
- » Work with the Council on Environmental Quality's (CEQ's) Steering Committee on Federal Sustainability and collaborate with the General Services Administration (GSA) and the National Park Service (NPS) (specifically, the National Center for Preservation Technology and Training) to collect stories of successful green rehabilitation of historic buildings and structures of all sizes and share them with federal agencies.
- » Advocate through its participation in the Council on Climate Preparedness and Resilience, other related initiatives, and daily activities regarding federal historic property stewardship that policy and planning for climate change preparedness and resilience adequately address preservation of America's irreplaceable historic properties.
- » Encourage other federal agencies to build a preservation program more inclusive of the diverse communities and cultures of the nation.

In addition, other federal agencies and non-federal partners should implement applicable recommended actions in this report to further current Administration initiatives and policies, the goals of EO 13287, and the National Historic Preservation Act (NHPA) related to real property management. These recommended actions include the following:

- » Federal agencies should request adequate funding to identify historic properties on federal land to meet the requirements of Section 110 of the NHPA.
- » The Administration should continue its support for and Congress should appropriate funding for a national inventory of historic properties to create efficiencies in infrastructure permitting and review and to improve environmental outcomes both on and off federal land (In FY 2015 Administration Budget; See also Budget Data Request No. 13-32: Infrastructure Permitting (2013)).
- » Federal agencies should ensure complete and accurate historic property inventory data is collected and considered before real property consolidation decisions are made, including the decision to leave a historic property unused.
- » The Office of Management and Budget (OMB), in consultation with GSA, the ACHP, and other affected agencies, should consider changes to the "Freeze the Footprint" offset guidance to increase flexibility for long-term, self-supporting Section 111 and Section 412 leases of historic properties to non-federal parties.
- » Federal agencies planning and designing energy efficient and sustainable buildings and structures, including those seeking Leadership in Energy and Environmental Design (LEED) certification, should acknowledge the durability of historic buildings, materials, and systems and consider reusing historic properties when feasible.

- » The Administration should direct federal agencies to review their existing Climate Change and Adaption Plans to identify threats to historic properties and incorporate strategies to protect those properties and to maximize their resilience.

The ACHP is committed to assisting federal agencies in implementing these recommendations so that future actions proposed by the Administration, departments, and agencies recognize historic properties as important public assets by giving appropriate consideration when planning for and implementing federal real property management strategies that address energy efficiency, sustainability, and climate change.

GSA invested \$20 million in a green design rehabilitation of the historic the Sidney Yates Building in Washington, D.C., the National Headquarters of the Forest Service.



CREDIT: CAROL M. HIGHSMITH PHOTOGRAPHY, INC./GSA





CREDIT: SHUTTERSTOCK

The historic Gavins Point Dam on the Missouri River; Nebraska and South Dakota, operated by the USACE, continues to provide hydroelectric power.

## CHAPTER 1: INTRODUCTION AND BACKGROUND

**THE FEDERAL GOVERNMENT IS RESPONSIBLE** for the stewardship of an immense variety and number of historic properties—including architect-designed buildings, landscapes of religious and cultural significance to Indian tribes, highly technical properties significant in science and engineering, campuses for federal activities, and a vast array of other property types—in all 50 states, the District of Columbia, and six U.S. territories. The responsibility for such stewardship was established by Congress in 1966 in the National Historic Preservation Act and reinforced by subsequent amendments to the Act. In the NHPA and throughout this report, “historic properties” are those buildings, structures, objects, sites, and districts that are listed in or are eligible for listing in the National Register of Historic Places (NRHP). Among those historic properties, some are nationally significant National Historic Landmarks (NHLs), designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the nation. Federal historic property stewardship fundamentally includes knowledge about the historic properties under federal control through inventory and efforts to protect and continue use of those properties so they can benefit the American people. Federal agencies have developed an array of protocols to accomplish their federal missions and stewardship responsibilities and to achieve a balance when these are in conflict.

## EXECUTIVE ORDER NO. 13287 – PRESERVE AMERICA (2003)

Signed by President Bush on March 3, 2003, Executive Order No. 13287, “Preserve America,” reinforces the role of federal agencies as stewards of historic properties in their ownership and redoubles the efforts of federal agencies to inventory, protect, and use such historic properties. (EO 13287 is reproduced in Appendix A.) The EO emphasizes that historic properties are valuable assets to support agency missions, and federal investment in them may stimulate local economic development. The EO also introduces federal accountability on the stewardship of historic properties in the form of triennial reporting. Throughout the EO, the ACHP is called upon to advise and assist federal agencies in meeting the EO requirements and to report to the President on progress and recommendations for improvements, a role consistent with the ACHP’s mission and establishment in the NHPA. An independent federal agency, the ACHP promotes the preservation, enhancement, and sustainable use of the nation’s diverse historic resources and advises the President and Congress on national historic preservation policy. (The membership of the ACHP is detailed in Appendix B.)

The historic preservation stewardship policy in Section 1 of the EO reaffirms the principles of the NHPA, as amended, in stating, “The federal government shall recognize and manage the historic properties in its ownership as assets that can support department and agency missions while contributing to the vitality and economic well-being of the nation’s communities.” (The EO uses “agencies” to describe executive branch departments and agencies, and this term is used throughout this report.)

Section 2 of the EO focuses on the need for each agency to build preservation partnerships consistent with agency missions and governing authorities and to ensure the agency encourages, supports, and fosters initiatives and investment in the protection and use of historic properties.

Section 3 of the EO required each federal agency “with real property management responsibilities” to assess its historic preservation stewardship in a baseline report to the ACHP and the Secretary of the Interior by September 30, 2004. In addition, every three years thereafter, each agency is required to submit a status report on its progress in these areas. Agencies are encouraged to utilize existing reporting systems to prepare this report.

Section 3(e) of the EO requires the head of each agency to designate a “senior policy level official” (SPO) to have policy oversight responsibility for the agency’s historic preservation program. This designation must be at the assistant secretary or deputy assistant secretary level, or the equivalent, as appropriate to the agency’s organization.

Section 4 of the EO requires each federal agency to promote the long-term preservation and use of historic properties as federal assets and, where consistent with agency missions, governing laws, and the nature of the historic properties, contribute to the local community and its economy. Agencies are also required to cooperate with communities to increase opportunities for public benefit from, and access to, federally owned historic properties.

As required by Section 4(e), the ACHP submitted to the President and the heads of agencies a report *Becoming Better Stewards of Our Past: Recommendations for Enhancing Federal Management of Historic Properties* in March 2004. This report recommended that

The federal government shall recognize and manage the historic properties in its ownership as assets that can support department and agency missions while contributing to the vitality and economic well-being of the nation’s communities. EO 13287, “Preserve America,” Section 1

federal agencies (1) partner with non-federal parties, (2) work smart, and (3) enhance the preservation ethic in order to stimulate further initiative, creativity, and efficiency in the federal stewardship of historic properties.

Section 5 of the EO requires federal agencies to use historic properties in their ownership in conjunction with state, tribal, and local tourism programs to foster viable economic partnerships, including cooperation and coordination with tourism officials and others with interests in the properties. It also directs the Department of Commerce (DOC) with the ACHP to assist state, tribal, and local tourism programs to promote the use of historic properties for heritage tourism and related economic development in a manner that contributes to the long-term preservation and productive use of those properties.

CREDIT: NOAA

## PRESERVE AMERICA COMMUNITY AND STEWARDS PROGRAMS

Preserve America is a federal program that encourages and supports community efforts to preserve and enjoy our priceless cultural and natural heritage assets. Established by the White House in 2003, the program's goals include expanding knowledge about the nation's past, strengthening regional identities and local pride, increasing public participation in preservation, and supporting the economic vitality of our communities. The ACHP administers the program in cooperation with the National Park Service and the Bureau of Land Management, with targeted support from the U.S. Forest Service. Other federal agencies, such as the National Oceanic and Atmospheric Administration, actively support local designations. Since 2004, First Lady Laura Bush and First Lady Michelle Obama have designated 895 Preserve America Communities and 43 Preserve America Stewards. The community designation portion of the program and the Preserve America Grants administered by the NPS were formally authorized by Congress in the Omnibus Public Land Management Act of 2009.

Preserve America Communities protect and celebrate their heritage, use their historic assets for economic development and community revitalization, and encourage people to experience and appreciate local historic properties through heritage tourism and heritage education. There are three types of Preserve America Communities: (1) municipalities or counties with an elected governing official or unincorporated communities within their jurisdiction, (2) distinct neighborhoods within large cities or city-counties with a population of 200,000 or greater; or (3) federally recognized tribal communities with an elected governing official, or a subdivision of such tribes.

The Preserve America Stewards program honors exemplary organizations, businesses, or agencies that (1) provide volunteers with opportunities to contribute in direct and tangible ways to the preservation, protection, and promotion of historic properties; (2) address an otherwise unfilled need in historic preservation through the use of volunteer efforts; and (3) demonstrate innovative and creative use of volunteer assistance in areas such as youth involvement, volunteer training, public education, and public-private partnerships.



The American Samoa Government and NOAA's Fagatele Bay National Marine Sanctuary celebrated the territory of American Samoa's designation as a Preserve America Community at Utulei Beach Park, Utulei Village, Pago Pago.



## PREVIOUS SECTION 3 REPORTING

In 2004, federal agencies “with real property management responsibilities” provided baseline reports to the ACHP and the Secretary of the Interior assessing the status of their inventories of historic properties, general condition and management needs of such properties, steps underway to meet such needs, and suitability of the agency’s historic properties to contribute to community economic development initiatives including heritage tourism. Each report also included a review of the agency’s regulations, management policies, and operating procedures for compliance with Sections 110 and 111 of the NHPA and recommendations to bring them into compliance if needed.

Every third year since, each agency is required to submit a report on its progress in these areas. Agencies are encouraged to utilize existing reporting systems to prepare this report. The ACHP has posted the progress reports received from agencies at [www.achp.gov/section3](http://www.achp.gov/section3). (A table of reports received from 2004 to the present cycle is provided in Appendix C.) The ACHP then analyzed the trends in the progress reports and made findings and recommendations in triennial reports to the President submitted in February 2006, 2009, 2012, and now 2015.

In the third triennial report to the President, submitted in 2012, the ACHP made key findings about the current state of federal historic property stewardship and recommendations on how agencies can continue to improve their performance in five areas: economic development and job creation, sustainability, renewable energy, federal real property realignment, and federal agency preservation programs in the 21st century. Based on these recommendations, federal stewardship of historic properties progressed with the following accomplishments during the current reporting period:

### Economic Development and Job Creation

In 2011, the ACHP published *Measuring Economic Impacts of Historic Preservation*, a report reviewing the state of existing knowledge and identifying needs for analytic tools prepared by PlaceEconomics with funding from DOC. The study was updated and published with other economic impacts studies in 2014 at [www.achp.gov/economicstudies](http://www.achp.gov/economicstudies).

### Sustainability

- » The ACHP and NPS actively participated in the process led by the U.S. Green Building Council to update its LEED certification standards. The resulting LEED v. 4, launched in March 2013, includes improved acknowledgement of historic significance, materials, and systems.

### Renewable Energy

- » The ACHP continues to participate actively in the Rapid Response Teams for Renewable Energy and Energy Transmission, and other priority infrastructure projects resulting in early and coordinated Section 106 compliance for these important and complex undertakings.

Section 106 of the NHPA (54 U.S.C. § 306108) requires agencies to consider the effects of projects they carry out, license, or fund on historic properties, and provide the ACHP with a reasonable opportunity to comment on such projects. The ACHP has issued the regulations implementing Section 106 at 36 C.F.R. Part 800.



- » The ACHP posted an Applicant Toolkit on its Web site ([www.achp.gov/apptoolkit](http://www.achp.gov/apptoolkit)) providing easy access to new and existing guidance regarding Section 106, aimed at project proponents.
- » The ACHP and CEQ jointly published *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106*. ([www.achp.gov/docs/NEPA\\_NHPA\\_Section\\_106\\_Handbook\\_Mar2013.pdf](http://www.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf))
- » The ACHP issued Guidance on Section 106 Agreement Documents. ([www.achp.gov/agreementdocguidance.html](http://www.achp.gov/agreementdocguidance.html))
- » The ACHP issued guidance regarding Traditional Cultural Landscapes in the Section 106 Review Process. ([www.achp.gov/na\\_culturallandscapes](http://www.achp.gov/na_culturallandscapes))
- » NPS continued its consultation process with federal agencies, State and Tribal Historic Preservation Officers, Indian tribes and Native Hawaiian organizations, and the public to revise “National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties.”

### Federal Real Property Realignment

- » The ACHP provided assistance as requested by the Forest Service (FS) and Department of Veterans Affairs (VA) in considering the use of the leasing authority under Section 111 of the NHPA. The ACHP continued to collaborate with GSA and NPS to encourage federal agencies to use existing federal leasing and reuse authorities for historic properties.
- » The ACHP briefed the Federal Real Property Council (FRPC) on the role of the ACHP, historic property stewardship, and federal compliance responsibilities. The ACHP created a work group comprising representatives of federal agencies and preservation partners which recommended improvements to the “historical status” field of the Federal Real Property Profile (FRPP). All the recommended improvements were incorporated in the 2014 edition of the Data Dictionary ([www.gsa.gov/portal/content/103101](http://www.gsa.gov/portal/content/103101)).

### Federal Agency Preservation Programs in the 21<sup>ST</sup> Century

- » NPS collaborated with the ACHP and other federal agencies to develop proposed modifications to the Secretary of the Interior’s Professional Qualification Standards.

Among other things, Section 111 of the NHPA (54 U.S.C. § 306121) authorizes an agency to lease a historic property if it determines the lease will adequately ensure the preservation of the property. The agency may retain and use the proceeds of the lease to defray the costs of the administration, maintenance, repair, and related expenses of that property or other historic properties that it owns or that are under its jurisdiction or control.

## CASE STUDY

### Retirement of the Space Shuttle Program as a Gift to the American People

#### FEDERAL AGENCY

National Aeronautics and Space Administration (NASA)

#### LOCATION

Alabama, California, Florida, Texas, and Virginia

In 2011, NASA entered into a Programmatic Agreement with the ACHP and the State Historic Preservation Officers (SHPOs) of Alabama, California, Florida, and Texas for the retirement of the Space Shuttle Orbiters from service. The orbiters were extensively recorded by the Historic American Engineering Record (HAER) using not only traditional line drawings and large format photographs but also new techniques. For example, HAER posted its video illustrating a point-cloud fly-through of *Discovery* on YouTube.com. Now preserved for future generations, the three historic active orbiters are now accessible to the public:

- » *Atlantis* at the Kennedy Space Center, Florida;
- » *Discovery* at the Smithsonian's National Air and Space Museum Annex, Virginia; and
- » *Endeavour* at the California Science Museum.

The three orbiters are big museum draws. The Smithsonian's National Air and Space



CREDIT: NASA

Space Shuttle *Atlantis* Exhibit at Kennedy Space Center, Florida, provides public access to the historic structure.

Museum continues to be the single most visited museum in the U.S., while the new Space Shuttle *Atlantis* display at the Kennedy Space Center has resulted in a 20 percent increase in visitors to more than 1.5 million annual visitors.

In addition to the historic space shuttles, NASA has also been reconfiguring and repurposing other facilities and infrastructure that supported the launch and missions of the shuttles. These include the Shuttle Avionics and Integration Laboratory (SAIL) at the Johnson Space Center; NASA's only facility where the actual orbiter hardware and mission software could be tested in a simulated flight environment. It included an exact mock-up of a cockpit of a shuttle for realistic testing. The SAIL facility carried out complete shuttle simulated ground testing and countdown and abort operations of an actual flight. The SAIL facility was saved from scheduled demolition and transitioned to be part of the Johnson Space Center visitor center experience.

Kennedy Space Center's Launch Pad 39A, another historic facility associated with the space shuttle program, is also preserved and now leased to SpaceX for its commercial Falcon Heavy rocket launches. Just as the gantry service structures were extensively modified from the Saturn program to launch the space shuttles, the pad will again be modified to launch the SpaceX rocket. SpaceX will pay for the overall costs of maintenance during the 20-year lease term.

CREDIT: NASA



The historic Launch Pad 39A at Kennedy Space Center, Florida, was no longer needed by NASA when the Space Shuttle program was retired. The site is now leased for commercial space use.

## FRAMEWORK FOR 2015 REPORT TO THE PRESIDENT

The ACHP will continue to use the five thematic areas, as established in the 2012 Report to the President, to organize its findings and recommendations for progress in meeting the goals of the Preserve America EO.

### Enhancing and Improving Inventories of Historic Properties

An accurate, comprehensive inventory and evaluations of an agency's historic properties are the foundation for understanding these assets, their management needs and goals, and economic potential. Opportunities to address inventory funding, databases, and meeting the requirements of Sections 106 and 110 of the NHPA are considered under this theme.

### Integrating Stewardship into Agency Planning

Considering historic preservation goals in an agency's strategic plans can open opportunities for historic properties to be part of the solution rather than the problem. Opportunities to address agency policies and procedures, consolidation, master planning, leasing and other cost sharing approaches, demolition and disposal, and climate change are included in this theme.

### Managing Assets

Establishing procedures to balance the consideration of historic property protection and use with an agency's mission will allow an agency to comply fully with the NHPA and EO 13514. Opportunities to address reuse of highly technical properties, rehabilitation for improved sustainability, and other management accomplishments are addressed in this theme.

### Contributing to the Economy

Local and regional economic development and heritage tourism can be promoted through a variety of agency activities and collaborative ventures. Opportunities to identify examples of agency programs and projects with reported measureable economic effects are considered in this theme.

### Building Partnerships

Public-private partnerships, when consistent with agency missions, can be effective in caring for historic properties, engaging volunteers, educating the public, promoting economic development and heritage tourism, and lessening federal costs. This theme highlights examples of public-private partnerships that accomplish the goals of EO 13287.





CREDIT: BOR

WWII Pillboxes before  
restoration by BOR in  
Hoover Dam National  
Historic Landmark, Nevada

## CHAPTER 2: CURRENT STATE OF REAL PROPERTY MANAGEMENT

**THE SUBMITTED SECTION 3 PROGRESS REPORTS** confirm that federal agencies in this reporting cycle, 2012-2015, remain focused on managing real property assets, including historic properties, to maximum advantage: seeking opportunities to generate federal revenue through leasing and disposal, minimize life-cycle costs, and improve energy efficiency and sustainability. Agencies also are seeking administrative improvements to the permitting process for infrastructure projects. Agencies began preparing for the effects of climate change, recovering from the effects of emergencies and disasters such as Hurricane Sandy, and working to develop a Unified Federal Review process for such future events. These efforts were spurred by Administration policies and initiatives, some established prior to the 2012 Report to the President and some since.

### CONTINUING POLICIES AND INITIATIVES

The 2012 Report to the President discussed several policies and initiatives that have continued to influence federal real property management in the current reporting cycle regarding disposal of unneeded property, energy efficiency and sustainability, and federal permitting and review of infrastructure projects. The key components of each and updates on relevant ACHP actions during the reporting cycle regarding these items are discussed below.

### Executive Order No. 13514 – Federal Leadership in Environmental, Energy, and Economic Performance (2009)

EO 13514 established a number of policies, including that federal agencies increase energy efficiency and that they design, construct, maintain, and operate high performance sustainable buildings in sustainable locations. ([www.gpo.gov/fdsys/pkg/FR-2009-10-08/pdf/E9-24518.pdf](http://www.gpo.gov/fdsys/pkg/FR-2009-10-08/pdf/E9-24518.pdf)) Fulfilling the requirements of Section 2(g) of the EO, in 2011 the ACHP, with the support of CEQ, issued “Sustainability and Historic Federal Buildings: Integrating the Requirements of the National Historic Preservation Act with the Requirements of Executive Order 13514: Federal Leadership in Environmental, Energy, and Economic Performance.” In this guidance, the ACHP recommended the following approach to decision making regarding federal historic buildings:

- » Consider reusing a historic building before constructing a new building or leasing space in a privately owned building,
- » Rehabilitate a historic building by using, reclaiming, and enhancing historic sustainable features and by adding compatible sustainability improvements when needed,
- » Design compatible new green construction in existing historic communities when needed, and
- » Consider disposing of a historic building only after other options are appropriately considered.

One hallmark of highly green design is LEED certification by the U.S. Green Building Council. There are four levels of certification (from least to most green): Certified, Silver, Gold, and Platinum. In this reporting cycle, the ACHP and NPS fulfilled the recommendation in the 2012 Report to the President by actively commenting on the LEED standards revision. The resulting LEED v. 4, launched in March 2013, includes improved acknowledgement of historic significance, materials, and systems in the certification standards.

Green design, however, does not require LEED certification. Federal agencies are incorporating green design solutions, with or without LEED certification, in a wide variety of new construction and rehabilitation projects, including new construction in historic districts and the rehabilitation of historic buildings and structures for continued productive use.

### Presidential Memorandum – Disposing of Unneeded Federal Real Estate—Increasing Sales Proceeds, Cutting Operating Costs, and Improving Energy Efficiency (2010)

In this Presidential Memorandum, the Administration directed agencies “to accelerate efforts to identify and eliminate excess properties,” as a means to eliminate wasteful spending of taxpayer dollars, save energy and water, and further reduce greenhouse gas pollution. ([www.gpo.gov/fdsys/pkg/DCPD-201000483/pdf/DCPD-201000483.pdf](http://www.gpo.gov/fdsys/pkg/DCPD-201000483/pdf/DCPD-201000483.pdf)) In the period from Fiscal Years 2010 through 2012, the agency efforts were expected

Each federal agency shall implement high performance sustainable federal building design, construction, operation and management, maintenance, and deconstruction.  
EO 13514, Section 2(g)



## CASE STUDY

### Historic Post Office Disposals

#### FEDERAL AGENCY

U.S. Postal Service (USPS)

#### LOCATION

Nationwide



CREDIT: USPS

USPS completed the Section 106 process and transferred the Burlingame Post Office in California to the City of Burlingame with a preservation covenant to ensure its long-term preservation and no adverse effect to the historic property.

Although USPS has disposed of post offices throughout its history, the rate of disposals has increased since 2008. Declining mail volumes, increased automation of mail sorting, and increased worker productivity have led USPS to determine that many post offices are larger than needed. Declining revenues have also forced the self-supporting agency to pursue opportunities to decrease costs, including those incurred through the operation and maintenance of its post offices. Inevitably, USPS has determined that many of its post offices are unneeded and ripe for disposal at this time.

However, Section 106 consultations on a number of high-profile disposals across the country have demonstrated that the historic preservation community and the public have significant concerns about the potential closure of these iconic buildings, including the loss of public use of the

buildings, the risk posed to the historic architecture and art, and the potential loss of public access to these places of importance to local communities. State Historic Preservation Officers and local communities have expressed concern not only that the post offices will be closed, but also have cited as problematic the manner in which USPS conducts its decision-making process, the transparency of that process, and how it meets the requirements of Section 106.

Responding to significant public concerns about widespread closure of historic post offices, Congress directed the ACHP to report on the compliance of USPS with Section 106 of the NHPA for these properties (Explanatory statement of the Consolidated Appropriations Act of 2014, Division G).

The ACHP provided Congress with *Preserving Historic Post Offices: A Report to*

Congress in April 2014, including findings and recommendations for USPS to improve compliance with Section 106 while building collaborative relationships with communities and historic preservation stakeholders. The ACHP emphasized that USPS awareness of and appreciation for the value of historic post offices as important community resources under federal ownership can foster better management practices that will benefit USPS, the historic properties, and the communities in which they reside.

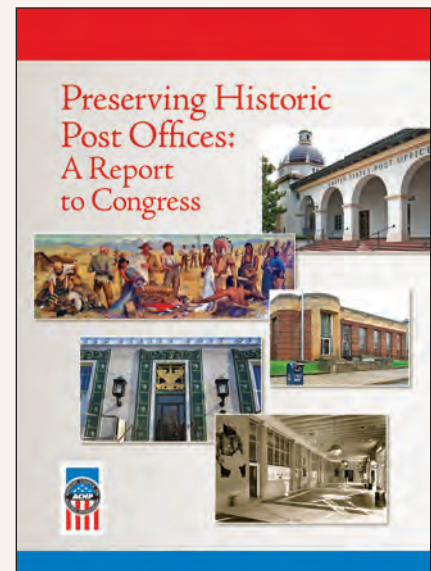
In a specific case, which illustrates some of the challenges discussed in the report, USPS initiated Section 106 consultation regarding the proposed transfer of the Burlingame Main Post Office to the City of Burlingame, California, after deciding to relocate postal services from the building. The historic post office, constructed between 1930 and 1942, is associated with and embodies the

distinctive characteristics of New Deal federal architecture in the Spanish Eclectic and Spanish Colonial Revival Styles. The interior of the post office retains original features such as marble wainscoting, original post office boxes, metal-trimmed bulletin boards, and service desks. While many historic post offices contain murals, this one does not.

USPS proposed that the transfer of the historic property out of federal control would include a historic preservation covenant, which the agency believed would ensure the long-term preservation of the historic property. Accordingly, the agency proposed that the undertaking would have no adverse effect to the historic post office. However, the State Historic Preservation Officer and other consulting parties objected to the inclusion of a clause in the covenant stating that, “the City may, for good cause, and following notice to the public, modify or cancel any or all of the foregoing restriction upon application for the grantee, its heir and successor, or assigns.” The parties were concerned that long-term preservation was not, in fact, ensured, if the City could modify or cancel the protective covenant “for good cause.” Initially, USPS did not wish

to consider alterations to this clause on the grounds that it was standard language. With technical assistance from the ACHP and through continued consultation with the consulting parties, USPS determined that it was appropriate to strike the clause in order to reach agreement that the undertaking, with the revised covenant, would not adversely affect the historic post office.

The Burlingame Post Office represents the successful conclusion of the Section 106 process for one historic postal facility. However, covenants have not proven to be the best solution for all disposals. When entities willing or able to enforce covenants are not readily available or reuse options for the historic property are limited, challenges remain for USPS and local communities. In the 2014 Report to Congress, the ACHP identifies a number of opportunities for USPS, the ACHP, and other preservation partners to work collaboratively to address these challenges and strive for better community outcomes. Creative and cooperative approaches focused on long-term preservation and economic development offer opportunities for both USPS and local communities to identify solutions that address everyone’s interests.



The ACHP issued *Preserving Historic Post Offices: A Report to Congress* on April 17, 2014.



Agencies reported real property cost savings of \$3.8 billion in response to the Presidential memorandum from disposal, space management, sustainability, and innovation activities.

to produce no less than \$3 billion in cost savings, realized through increased proceeds from the sale of assets and reduced operating, maintenance, and energy expenses from disposals or other space consolidation efforts, including leases that were ended. Many of the disposed properties included historic buildings, structures, objects, sites, and districts.

Agencies reported real property cost savings of \$3.8 billion in response to the Presidential memorandum from disposal, space management, sustainability, and innovation activities. The Government Accountability Office (GAO) audited the agency reports and published GAO-14-12, “Federal Real Property: Improved Standards Needed to Ensure That Agencies’ Reported Cost Savings Are Reliable and Transparent” on October 29, 2013. GAO’s review of the six selected agencies identified several problems that affect the reliability and transparency of the reporting of cost savings in response to the June 2010 memorandum. In particular, the memorandum and subsequent guidance issued by OMB were not clear on the types of savings that could be reported, particularly because the term “cost savings” was not clearly defined. Further, OMB did not require agencies to provide detailed documentation of their reported savings or include specific information about agencies’ reported savings on Performance.gov, limiting transparency. GAO recommended that the Director of OMB establish clear and specific standards to help ensure reliability and transparency in the reporting of future real property cost savings. OMB generally agreed with GAO’s recommendation.

While the term of the policy only includes seven months in the current reporting period, the effects of this policy have continued as its goals have been incorporated into new policies and initiatives, most especially “Freeze the Footprint,” discussed below.

### Executive Order No. 13604 – Improving Federal Performance of Federal Permitting and Review of Infrastructure Projects (2012)

As described in the 2012 Report to the President, a Presidential Memorandum issued in 2011 titled, “Speeding Infrastructure Development through More Efficient and Effective Permitting and Environmental Review,” required the Departments of Agriculture, Commerce, Housing and Urban Development, the Interior, and Transportation to identify high-priority permitted infrastructure projects to be expedited through the permitting and environmental review process. ([www.gpo.gov/fdsys/pkg/DCPD-201100601/pdf/DCPD-201100601.pdf](http://www.gpo.gov/fdsys/pkg/DCPD-201100601/pdf/DCPD-201100601.pdf)) ACHP senior staff participated in the resulting “Rapid Response Teams” formed to monitor the project review processes. The ACHP also formally participated in the Section 106 review of many of the subject projects to aid the permitting agency and other participants in the process in understanding the requirements of the Section 106 process, its inherent flexibility, project-appropriate means to expedite the process, and strategies for successfully reaching agreement among the consulting parties.

The Presidential Memorandum also instructed agencies to implement new measures to improve the accountability, transparency, and efficiency of the permitting and environmental review processes through the use of modern information technology. This idea was later transferred and expanded upon in EO 13604, “Improving Federal Performance of Federal Permitting and Review of Infrastructure Projects,” issued in 2012. ([www.gpo.gov/fdsys/pkg/FR-2012-03-28/pdf/2012-7636.pdf](http://www.gpo.gov/fdsys/pkg/FR-2012-03-28/pdf/2012-7636.pdf)) EO 13604 directs

agencies “to execute federal permitting and review processes with maximum efficiency and effectiveness, ensuring the health, safety, and security of communities and the environment while supporting vital economic growth.” It further directs agencies that the federal permitting and review processes must:

- » Provide a transparent, consistent, and predictable path for project sponsors and affected communities
- » Set and adhere to timelines and schedules
- » Set clear permitting performance goals and track progress against those goals
- » Encourage early collaboration among agencies, project sponsors, and affected stakeholders
- » Provide for transparency and accountability by utilizing cost-effective information technology to collect and disseminate information
- » Rely upon early and active consultation with state, local, and tribal governments
- » Recognize the critical role project sponsors play
- » Enable agencies to share priorities, work collaboratively and concurrently to advance reviews and permitting decisions, and facilitate the resolution of disputes at all levels of agency organization.

Section 2 of the EO established the Steering Committee on Federal Infrastructure Permitting and Review Process Improvement to develop and implement a Performance Plan. The ACHP is a member of this Steering Committee.

The ACHP reviewed the process defined in the regulations implementing Section 106 of the NHPA, “Protection of Historic Properties” (36 CFR Part 800). The agency determined that the process, founded on consultation among a federal agency and affected stakeholders including Indian tribes and project sponsors, addressed the requirements of the EO and did not need revision. However, the need for more explanatory materials regarding the coordination of the requirements of Section 106 with those of the National Environmental Policy Act (NEPA) and the role of project sponsors in the process were identified. In March 2013, the ACHP and CEQ jointly published *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106*, accomplishing one of the recommendations in the 2012 Report to the President. In addition, in September 2013, the ACHP launched the “Applicant Toolkit” on its Web site as a living collection of explanatory materials about the Section 106 process in general and the role of project sponsors (“applicants,” in the Section 106 process). In October 2014, the ACHP also posted “Guidance on Agreement Documents” on its Web site providing assistance to all participants in developing, implementing, and concluding Section 106 agreements.

#### NEW GUIDANCE AVAILABLE AT [WWW.ACHP.GOV](http://WWW.ACHP.GOV):

Traditional Cultural  
Landscapes in the Section  
106 Review Process, March  
2012

Traditional Cultural  
Landscapes in the Section  
106 Review Process:  
Questions and Answers,  
July 2012

NEPA and NHPA: A  
Handbook for Integrating  
NEPA and Section 106,  
March 2013

The Applicant Toolkit,  
September 2013

Guidance on Agreement  
Documents, October 2014

One of the historic preservation issues in the planning for many large infrastructure projects is the identification and protection of traditional cultural landscapes of religious and cultural significance to Indian tribes and Native Hawaiian organizations. Such historic properties may be located entirely or in part within federal lands, especially those owned by the Bureau of Land Management (BLM) and FS. Fulfilling the recommendation from the 2012 Report to the President, the ACHP continued to implement its Native American Traditional Cultural Landscapes Action Plan, adopted in November 2011. In 2012, the ACHP published, “Traditional Cultural Landscapes in the Section 106 Review Process,” and “Native American Traditional Cultural Landscapes and the Section 106 Review Process: Questions and Answers.” The NPS has also been working to update its guidance, “National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties,” another recommendation from the 2012 Report to the President.

## NEW POLICIES AND INITIATIVES

Since the 2012 Report to the President, the Administration policies regarding disposal and sustainability of federal buildings and structures converged in a new policy known as “Freeze the Footprint.” At the same time, federal agencies began preparing for the effects of climate change, recovered from the effects of emergencies and disasters such as Hurricane Sandy, and worked to develop a Unified Federal Review process for such future events.

### OMB Memorandum M-12-12 – Promoting Efficient Spending to Support Agency Operations and “Freeze The Footprint” (2012)

According to the OMB Memorandum ([www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-12.pdf](http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-12.pdf)) and subsequent guidance in OMB Management Procedures Memorandum 2013-02, “Implementation of OMB Memorandum M-12-12 Section 3: Freeze the Footprint,” (2013), a federal agency shall not increase on an annual basis the size of its domestic real estate inventory, measured in square footage, for space predominantly used for offices and warehouses. ([www.whitehouse.gov/sites/default/files/omb/financial/memos/implementation-of-freeze-the-footprint-guidance.pdf](http://www.whitehouse.gov/sites/default/files/omb/financial/memos/implementation-of-freeze-the-footprint-guidance.pdf)) Any growth in total office or warehouse space must be offset by a corresponding decrease through declaration of excess, disposal, or closed/realigned as part of a Department of Defense (DOD) Base Realignment and Closure (BRAC) process. An agency may not use as an offset properties that the agency has “mothballed” or those subject to enhanced use leases (EULs) and outleases, even when leases present opportunities to leverage federal resources through private investment and public-private partnerships. OMB recommends that agencies work collaboratively with other agencies and GSA for opportunities to co-locate or consolidate that will result in no net growth of the overall federal real estate inventory.

A federal agency shall not increase on an annual basis the size of its domestic real estate inventory, measured in square footage, for space predominately used for offices and warehouses.

## Executive Order No. 13653 – Preparing the United States for the Impacts of Climate Change (2013)

Building on the imperatives outlined in EO 13514 “Federal Leadership in Environmental, Energy, and Economic Performance” (2009), EO 13653 directs the federal government to pursue new strategies to improve the nation’s preparedness and resilience to climate change. ([www.gpo.gov/fdsys/pkg/FR-2013-11-06/pdf/2013-26785.pdf](http://www.gpo.gov/fdsys/pkg/FR-2013-11-06/pdf/2013-26785.pdf)) Agencies should promote:

- » Engaged and strong partnerships and information sharing at all levels of government;
- » Risk-informed decision making and the tools to facilitate it;
- » Adaptive learning, in which experiences serve as opportunities to inform and adjust future actions; and
- » Preparedness planning.

The EO directs agencies to work with CEQ and OMB to complete an inventory and assessment of proposed and completed changes to their land- and water-related policies, programs, and regulations necessary to make watersheds, natural resources and ecosystems, and the communities and economies that depend on them more resilient to climate change. Section 5 of the EO requires agencies to develop or continue to develop, implement, and update comprehensive plans that integrate consideration of climate change into agency operations and overall mission objectives, including the following:

- » identification and assessment of climate change-related impacts on and risks to the agency’s ability to accomplish its missions, operations, and programs;
- » a description of programs, policies, and plans the agency has already put in place, as well as additional actions the agency will take, to manage climate risks in the near term and build resilience in the short and long term;
- » a description of how any climate change-related risk identified that is deemed so significant that it impairs an agency’s statutory mission or operation will be addressed, including through the agency’s existing reporting requirements;
- » a description of how the agency will consider the need to improve climate adaptation and resilience, including the costs and benefits of such improvement, with respect to agency suppliers, supply chain, real property investments, and capital equipment purchases such as updating agency policies for leasing, building upgrades, relocation of existing facilities and equipment, and construction of new facilities; and
- » a description of how the agency will contribute to coordinated interagency efforts to support climate preparedness and resilience at all levels of government, including collaborative work across agencies’ regional offices and hubs, and through coordinated development of information, data, and tools.

In addition, the EO establishes a Council on Climate Preparedness and Resilience to work across agencies and with state, local, and tribal governments; academic and research institutions; and private and nonprofit sectors to develop and implement actions related

to climate preparedness and resilience; support state, local, and tribal actions to address the impacts of climate change; and facilitate the integration of science-based climate information into policies and planning at all levels. The ACHP participates in the Council on Climate Preparedness and Resilience established by EO 13653.

### **Sandy Recovery Improvement Act of 2013, “Unified Federal Review”**

In October 2012, Hurricane Sandy damaged hundreds of thousands of homes, forced tens of thousands of survivors into shelters, and caused billions of dollars in damage to vital infrastructure systems including power transmission, transportation, and water and sewage treatment facilities. As a direct result of the storm, 73 people in the U.S. lost their lives. In accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), the President made Major Disaster Declarations for 14 states.

Typically in disaster and emergency situations, state, tribal, territorial, and local governments who applied for assistance to recover from damage caused by a disaster were required to submit their recovery projects to several federal agencies for environmental and historic preservation reviews. Often the same data was required from various agencies to comply with the legal requirements. To improve the review process, Congress passed the Sandy Recovery Improvement Act, which added Section 429 to the Stafford Act, governing disaster recovery assistance. The new section directed the President, in consultation with CEQ and the ACHP, “to establish an expedited and unified interagency review process to ensure compliance with environmental and historic requirements under federal law relating to disaster recovery projects, in order to expedite the recovery process, consistent with applicable law.”

Development of the Unified Federal Environmental and Historic Preservation Review process was led by a Steering Group consisting of CEQ, Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), and the ACHP and a larger working group that included representation from diverse agencies who continue to work on identifying ways to enhance efficiencies in environmental and historic preservation reviews.

The goal of the process is to formalize and standardize the unification of regulatory requirements so that agencies can take advantage of the same project approval mechanisms and resources to expedite reviews necessary for more timely decisions on disaster recovery projects. Federal agencies must satisfy their own requirements and coordinate with each other when an applicant’s project requires decisions from multiple agencies. When interagency coordination is successful, agency decision making is improved, resources are conserved, and duplication of analyses are avoided so that agencies may support community resiliency and expedite the recovery process.

The Steering Group also continues to coordinate its work with other interagency efforts, such as the Federal Infrastructure Permitting and Review Process Improvement Working Group (EO 13604, discussed above) and the Hurricane Sandy Task Force (EO 13632, “Establishing the Hurricane Sandy Rebuilding Task Force,” 2012), in instances where the efforts of these various groups are focused on similar or related topics and issues. Such

coordination is intended to help the groups leverage existing efforts being undertaken by others, avoid redundant efforts across the various groups, and keep the focus on environmental and historic preservation compliance.

## BUILDING A MORE INCLUSIVE PRESERVATION PROGRAM

The changing demographics of America pose opportunities as well as challenges for the national historic preservation program. The diversity of cultures in the U.S. shape and enrich the American experience, and the federal government can continue to encourage wider involvement and representation in determining what historic sites are worthy of recognition and preservation; how history and cultural heritage should be valued, interpreted, and preserved; and how the American public as a whole can take advantage of the programs and tools created under the NHPA.

The ACHP is committed to building a more inclusive preservation program in all aspects of its work, in accordance with an initiative adopted by the membership in 2013. In order to achieve this goal, the ACHP continually encourages the meaningful involvement of the diverse public and interested parties in the identification, evaluation, and protection of historic properties through its participation in the Section 106 review process and its other daily business. Information about “preservationists in the neighborhood,” opportunities for youth, teachers, and community involvement; examples of model inclusiveness programs; and preservation partner activities are posted on the Web site. ([www.achp.gov/inclusiveness](http://www.achp.gov/inclusiveness))

Similarly, the NPS is committed to connecting and amplifying all Americans’ stories throughout national parks and communities across the U.S. Current National Park Service Heritage Initiatives explore the rich and diverse legacy of all Americans: the American Latino Heritage; Asian American Pacific Islander; Women’s; and Lesbian, Gay, Bisexual, and Transgender Heritage Initiatives. The NPS plan for the agency’s centennial “A Call to Action: Preparing for a Second Century of Stewardship and Engagement” includes several objectives to build a more inclusive preservation program:

- » Fill in the Gaps—Identify a national system of parks and protected sites (rivers, heritage areas, trails, and landmarks) that fully represents our natural resources and the nation’s cultural experience.
- » History Lesson—Excite and involve new audiences in the exploration of the full diversity of the American experience by conducting history discovery events, projects, and activities that invite them to explore and share their heritage, using a variety of participatory methods, in at least 100 parks and programs.
- » Stop Talking and Listen—Learn about the challenges and opportunities associated with connecting diverse communities to the great outdoors and our collective history. To accomplish this, the NPS will conduct in-depth, ongoing conversations with citizens in seven communities, one in each NPS Region, representing broadly varied cultures and locations. The NPS will create and implement work plans at each location, which explore new approaches for building and sustaining mutually beneficial relationships with diverse communities.

CREDIT: NPS



Students in the Urban Archeology Program sift for artifacts at a national park in the National Capital Region.



NPS also develops publications, sponsors internships, funds research projects, distributes information about diverse cultures and the historic places significant to them, and sponsors conferences. For more information, see the NPS Web site. ([www.nps.gov/crdi](http://www.nps.gov/crdi))

These efforts underscore the important role that federal agencies can and must play in expanding opportunities for all Americans to engage in the federal preservation program.

## 50<sup>th</sup> ANNIVERSARY OF THE NATIONAL HISTORIC PRESERVATION ACT

In 2016, the NHPA will celebrate its 50th birthday. Section 1 of EO 13287 reaffirms the major principles of the NHPA policy by recognizing that federal agencies should manage federal historic properties in a manner that supports “the department and agency missions while contributing to the vitality of the economic well-being of the nation’s communities and fostering broader appreciation for the development of the United States and its underlying values.” This anniversary presents an opportunity to identify long-term policy priorities and objectives to ensure federal historic preservation leadership continues into the next 50 years and beyond.

## CORRELATION TO AGENCIES’ SECTION 3 PROGRESS REPORTS

Taken together, these Administration policies and initiatives seek to improve the transparent, efficient, and cost-effective management of federal real property. Agencies have expanded opportunities for historic properties to be a part of the energy efficient and sustainable solution to federal property needs. However, despite the general trend toward improvement, agencies continue to face many challenges in balancing historic preservation and real property management needs that were reported by the ACHP in 2009 and 2012:

- » Limited resources to support historic property identification, condition assessments, maintenance, and capital improvement projects;
- » Lack of accurate and available information regarding the presence and value of historic assets in the agency’s real property portfolio;
- » Existence of conflicting regulations and directives regarding the management and disposal of real property assets; and
- » Lack of agency experience with and guidance on creative strategies for using historic properties to support agency missions.

In the following chapters, the ACHP will summarize the agency progress reports submitted and provide findings and recommendations for actions to continue to improve the stewardship of historic properties under federal ownership.

Despite the general trend toward improvement, agencies continue to face many challenges in balancing historic preservation and real property management needs that were reported by the ACHP in 2009 and 2012.





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## CHAPTER 3: CURRENT STATE OF FEDERAL STEWARDSHIP

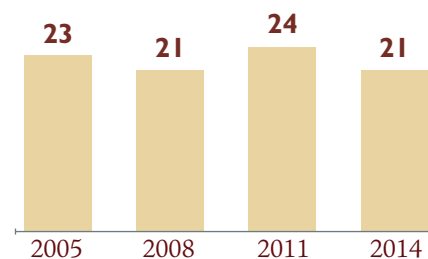
**AS FEDERAL AGENCIES REMAIN FOCUSED** on managing real property assets, including historic properties, to maximum advantage, the requirements to identify, protect, and use historic properties under their ownership sometimes complement and sometimes conflict with those property management efforts. The progress reports submitted in 2014 demonstrate that federal agencies are continuing to improve and diversify the development and application of tools, strategies, and partnerships to achieve the objectives of EO 13287.

In 2004, federal agencies “with real property management responsibilities” provided baseline reports to the ACHP and the Secretary of the Interior as required by the Preserve America EO. In 2005, 2008, 2011, and 2014 each agency was required to submit a report on its progress in these areas. Agencies were encouraged to utilize existing reporting systems to prepare this report. The ACHP has posted the progress reports received from agencies at [www.achp.gov/section3](http://www.achp.gov/section3).

The number of progress reports continues to fluctuate each cycle. Agencies may elect not to submit progress reports because the provisions in EO 13287 do not apply to them as they do not own real property. Individual bureaus may elect to submit separate progress reports one cycle but consolidated reports with their parent agency or department in another reporting cycle. While the ACHP provided its “Advisory Guidelines Implementing Section 3: Reporting Progress on the Identification, Protection, and Use

The DHS Directorate for Science and Technology partners with lighthouse and military enthusiasts to allow exterior tours of the historic Plum Island Lighthouse and Fort Terry, New York.

**PROGRESS REPORTS SUBMITTED, 2005–2014**



See Appendix C for a complete list of Section 3 reports submitted, 2004–2014.

of Federal Historic Properties” (Appendix D), some agencies elected to address the questions in the advisory, and not mandatory, guidelines while others did not. As a result of these variables, the quantity and quality of the reporting fluctuates and can result in challenges for the ACHP to identify consistent data and trends. But general trends are nonetheless apparent and discussed here in the framework outlined in Chapter 1.

## INVENTORIES OF HISTORIC PROPERTIES

An accurate, comprehensive inventory and evaluations of an agency’s historic properties are the foundation for understanding these assets, management needs and goals, and economic potential. In the reporting cycle, federal agencies reported incremental advancement in the collection of new inventory data but substantial improvement in the management and usefulness of inventory data.

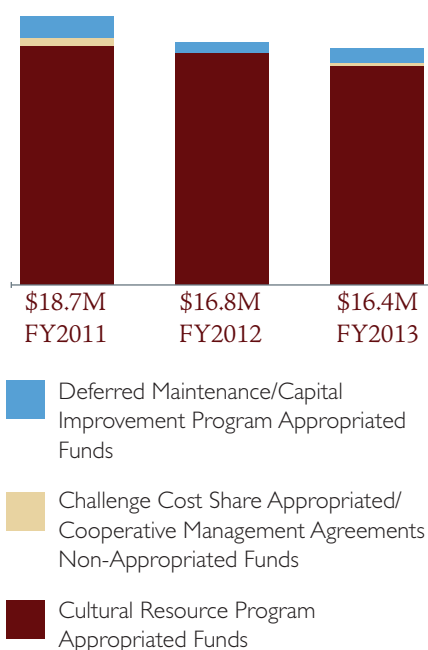
## FUNDING

Since 2004, federal agencies have reported challenges in achieving an accurate, comprehensive inventory of historic assets under their control as required by Section 110 of the NHPA and supported by EO 13287. The primary challenge to achieving this goal is funding. Many agencies have a small budget for their historic preservation program, and those budgets have often been limited even further by budget constraints in recent years. As an example, the Federal Bureau of Prisons (BOP) reports that no identification studies under Section 110 have been initiated during the reporting cycle and that its major challenge is a lack of funding to address its institutions that are 50 years of age or older.

Echoing the comments of the BOP, the Bureau of Indian Affairs (BIA) reports that reductions in program funding and the 2013 sequestration have further restricted the agency’s ability to inventory and evaluate historic structures. In 2013, it issued a single contract to evaluate a group of buildings on the Navajo Reservation; no other contracts were issued in the past three years.

Even agencies with substantial federal historic preservation programs, supported by both appropriated and non-appropriated funds, have felt budget restrictions in recent years. The BLM reported in detail on its declining funding through the cycle.

**BLM CULTURAL RESOURCES  
MANAGEMENT PROGRAM FUNDING**



## FEDERAL REAL PROPERTY PROFILE AND OTHER DATABASES

Agencies have benefitted in this reporting cycle from attention to reporting standards for historic properties, especially buildings and structures. In June 2012, the GAO published GAO-12-645, “Federal Real Property: National Strategy and Better Data Needed to Improve Management of Excess and Underutilized Property.” The GAO found that the FRPC has not followed sound data collection practices in designing and maintaining the FRPP database, raising concern that the database is not a useful tool for describing the nature, use, and extent of excess and underutilized federal real property. While GAO did not highlight difficulties specific to the “historical status” field of the FRPP, the ACHP, GSA, and other agencies took note of the report and identified the FRPP’s shortcomings as potential impediments to sound decision making and the stewardship of historic buildings and structures.

In December 2012, GAO explored this concern further and published GAO-13-35, “Federal Real Property: Improved Data Needed to Strategically Manage Historic Buildings, Address Multiple Challenges.” In this audit of GSA, NPS, and VA, GAO found that data on historic buildings in the FRPP were incomplete and inconsistent and that these data flaws compounded the agencies’ challenges to manage historic buildings in their portfolios. GAO recommended that GSA (Office of Government-wide Policy) collaborate and consult with NPS, VA, FRPC member agencies, and others to address the need for improved data on historic buildings in the FRPP. GSA agreed with GAO’s recommendation and began corrective action before the report was published.

Responding to this call to action and implementing recommendations of the 2012 Section 3 Report to the President, the ACHP created a work group to address these concerns. Comprising representatives of GSA (Public Building Service), DOD, DHS, VA, NPS, BLM, Department of the Interior (DOI), the National Conference of State Historic Preservation Officers, and the National Trust for Historic Preservation, the work group developed and approved recommendations to improve the “historical status” field of the FRPP, which were submitted to GSA’s Office of Government-wide Policy and incorporated in the 2014 edition of the Data Dictionary. In addition, the ACHP executive director briefed the FRPC members on the role of the ACHP, historic property stewardship, and federal compliance responsibilities. The work group has identified additional areas on which it may advise the FRPC regarding historic asset data to improve its usefulness in agency planning and plans to continue this advisory relationship forged in 2014.

Most agencies developed their Section 3 progress reports using agency-specific real property management systems in addition to FRPP data. For some agencies, like U.S. Customs and Border Protection (CBP), the reporting system used is new and was designed with an eye to improve upon the experiences of other agencies and to address the concerns of GAO in its several reports. Other agencies continue to use separate systems because the FRPP is designed to document buildings and structures but typically does not include data regarding archaeological sites, nor does it consistently collect data on historic districts and objects. BLM reports that generally archaeological sites will not be included in the FRPP unless they are improved for visitation with access, interpretation, adjunct buildings or structures, or other structural features.

In addition, USPS reports that it had numerous errors between its internal electronic Facilities Management System and the National Register of Historic Places data on file with the NPS. In March 2014, USPS began reconciling this data such that it will be more useful in future Section 3 and other reporting. In general, the ACHP notes that the National Register files are difficult to reconcile with almost all agency real property databases for a variety of reasons, most notably:

- » Federal real property databases typically document only buildings and structures, while the National Register includes historic buildings, structures, sites, objects, and districts.



## CASE STUDY

### Inventory Data Management

#### FEDERAL AGENCY

U.S. Customs and Border Protection (CBP)

#### LOCATION

Nationwide



CREDIT: CBP

CBP maintains and operates historic border crossing facilities and U.S. Customs Houses, including the one in Mayaguez, Puerto Rico.

CBP has made significant improvements in its identification and evaluation of historic properties since 2011. CBP's efforts address both owned and leased facilities so that the agency has a full picture of its portfolio, regardless of ownership. In 2012, the Cultural Resources Integrated Organization System (CRIOS) was developed to provide CBP with a consolidated database to house and maintain all data regarding historic properties, including reports and eligibility determinations. The system was designed as an interim step toward inclusion of historic property data into CBP's real property database, known as TRIRGA.

The integration of the historic property data into the larger system was identified by CBP leadership as a priority project. Early integration and coordination began in October 2012 for the development of the application enhancement. In May 2014

this effort was concluded and the Cultural Resources in TRIRGA (CRIT) function was fully added to the TRIRGA system. Upon the completion of this effort, the CRIOS system was stood down and is no longer used.

CRIT was designed to address specifically how CBP manages both its real property and its historic resources. The system complies with Section 110 of the NHPA requirements for CBP to properly manage and maintain its historic properties as well as DHS Directive 017-01, "Historic Preservation in Asset Management and Operations," which requires CBP to manage actively its historic properties and to manage its historic property data in an auditable format.

Since the development of CRIOS and CRIT, CBP has obtained a much more accurate picture of the historic properties

within its portfolio. The integration of the historic property data into the agency's real property database addresses many of the data maintenance issues raised by GAO in its report, "Federal Real Property: Improved Data Needed to Strategically Manage Historic Buildings, Address Multiple Challenges" (2012). To reduce obstacles to providing accurate data, CBP only uses the historic status used by the FRPC, and the Real Property Administration Branch has transferred responsibility for the historic status section of the FRPC data to the Environmental and Energy Division, the division within CBP responsible for overseeing the agency's compliance with NHPA and other historic preservation laws. This data is also maintained within TRIRGA and is automatically synchronized with CRIT.

- » Many federal real property databases record historic properties at the individual building and structure level, while the National Register “counts” historic districts as single historic properties which may contain many contributing buildings, structures, objects, and sites.

The NPS is unique in that it maintains an evaluated inventory of cultural landscapes having historical significance, in which the NPS has, or plans to acquire, a legal interest. NPS reports that at the end of FY 2014, the inventory contained approximately 700 cultural landscapes that are eligible for or listed in the NRHP or those that are managed as a cultural resource because of legislation or park planning process decisions. About 124 of these were added since September 2010.

## NOTABLE INVENTORY STUDIES

Despite an overall decline in funding, in 2012 a number of agencies completed context studies and nominations to the NRHP for large landscape scale historic properties using American Recovery and Reinvestment Act (ARRA) funding:

- » The U.S. Army Corps of Engineers (USACE) used ARRA funds to complete 40 work orders for identification efforts totaling \$20 million in 18 months. The contractors conducted archaeological survey, site evaluations, geo-archaeological assessments, condition assessments, Geographic Information System (GIS) data analysis and modeling, and curation. As a result, 76,000 acres were surveyed; 929 sites were identified; 601 sites were revisited; 42 sites were tested for eligibility to the NRHP; 453 sites were determined eligible for the NRHP; 428 sites were determined not eligible for the NRHP; and 48 sites will require further evaluation to determine eligibility.
- » BLM used ARRA funds, partnerships with trail associations, and consultants through the National Historic Trails Inventory Project to inventory more than 247 linear miles along the Oregon, Mormon Pioneer, California, and Pony Express National Historic Trails. Archaeologists recorded 206 trail segments, 130 associated sites, and 64 isolated resources. BLM completed a visual setting inventory at various observation points along the corridors and provided a historic landscape integrity analysis at each point.

Other agencies used appropriations combined with partnerships to accomplish identification efforts. Since Hurricane Sandy struck the eastern coast of the U.S. in October 2012, shipwreck timbers and 150-year-old artifacts like shoes and bottles have been washing ashore in the Chincoteague National Wildlife Refuge in Virginia. The Fish and Wildlife Service (FWS) contracted an archaeologist and enlisted volunteers to tag the shipwreck timbers and track them as the ocean degraded and moved them over time. The team developed a new type of tag, based on those used to track marine mammals, to improve the success of the program.

In 2012, USPS collaborated with the National Conference of State Historic Preservation Officers and NPS to complete a nationwide historic context study for Postal Service buildings, 1940-1971. This context is helpful for the agency as it continues its efforts to dispose of unneeded properties to address its financial crises.

CREDIT: PAUL LARUE



Washington High School students from Washington Court House, Ohio, research unmarked veterans' graves and partner with the National Cemetery Administration (VA) to obtain headstones.

## SECTION 110 AND SECTION 106

While Section 110 of the NHPA requires federal agencies to identify historic properties under their jurisdiction or control, the Act does not provide specific metrics by which to enforce compliance. Section 110 prescribes a proactive approach and is especially valuable for facility, regional, and national level real property decision making for the short and long terms. Section 106, on the other hand, requires an agency to identify historic properties in the area of potential effect for a program or project. It is reactive and designed to answer undertaking-specific data needs. Most agencies report they will continue in austere budget circumstances to rely primarily on the Section 106 process to inventory their historic properties on an as needed basis.

Further, while Section 110 of the NHPA requires federal agencies to nominate historic properties under their jurisdiction or control to the NRHP, many do not routinely set aside the resources to do this. Several agencies expressed the opinion that NRHP listing is unnecessary to achieve protection and a burden on resources. As an example, the Bureau of Reclamation (BOR) stated, “A ‘consensus’ determination of eligibility with a SHPO provides the same level of protection to a historic property as does listing, but requires far less time and expense to accomplish.”

Even when inventory is completed as part of the Section 106 process, agencies have demonstrated that the scope of the inventory effort can be designed to maximize its usefulness after the immediate undertaking. In one example, the Walter Reed Army Medical Center in Washington, D.C., contracted USACE to survey the federal facility as part of the Section 106 process for the base closure in accordance with BRAC. For the first time in its history, the entire base was evaluated holistically, including the cultural and designed landscapes. The result of this comprehensive and collaborative historic property inventory process was the determination of eligibility for the Walter Reed Army Medical Center Historic District consisting of 35 contributing resources in the areas of healthcare, education, and defense. In addition, the base was found to be significant as a Civil War battlefield associated with the Battle of Fort Stevens, July 11–12, 1864. The inventory aided in the development of existing condition studies to be used for future development of the site, created source materials for public interpretation stipulated in the Section 106 agreement, and produced photographs made available to the public on Flickr.

## STEWARDSHIP AND AGENCY PLANNING

A number of agencies have reviewed and improved their historic preservation policies and procedures in this reporting cycle. Required by EO 13604, “Improving Federal Performance of Federal Permitting and Review of Infrastructure Projects,” (2012) land managing agencies that issue permits, licenses, and other approvals for transmission lines, alternative energy, transportation, or other infrastructure projects considered and implemented any needed clarifications of policy or procedures that would improve performance in the permitting process.

In this reporting cycle, the most challenging issue for all agencies has been the integration of historic preservation values into agency real property planning. Nearly all agencies report historic buildings and structures in their ownership that are currently unoccupied, some mothballed, and others with deferred maintenance. Current initiatives to “Freeze the Footprint” and dispose of unneeded real estate assets are shining light on federal real property management and exposing these unused and often neglected historic properties as ripe for disposition decisions.

## AGENCY POLICIES AND PROCEDURES

In the reporting cycle, the ACHP, BLM, and DOI continued the Western Renewable Energy and Historic Preservation Workgroup established in July 2011. Workgroup discussions and EO 13604 led BLM to make policy and procedure changes published in:

- » BLM Instruction Memorandum 2013-020, “Section 106 Compliance on Major Infrastructure Projects”
- » Information Bulletin 2013-060, “Interim Guidance for Compliance with Section 106 of the National Historic Preservation Act and Tribal Consultation for Major Infrastructure Projects”
- » Information Bulletin 2014-055, “Interim Guidance, Tribal Consultation; Questions and Answers for Major Infrastructure Projects; Legal Parameters in the Section 106 Tribal Consultation Process”

In October 2013, the Secretary of the Interior issued Order No. 3330, “Improving Mitigation Policies and Practices of the Department of the Interior,” which established a Department-wide mitigation strategy ensuring consistency and efficiency in the review and permitting of infrastructure development projects. Central to this strategy is (1) the use of a landscape-scale approach to identify and facilitate investment in key conservation priorities in a region, (2) early integration of mitigation considerations in project planning and design, (3) ensuring the durability of mitigation measures over time, (4) ensuring transparency and consistency in mitigation decisions, and (5) a focus on mitigation efforts that improve the resilience of the nation’s resources in the face of climate change.

Accordingly, BLM reports it is implementing a “landscape scale” approach to its land management. With this approach, staff has the opportunity to identify critical heritage issues and areas prior to land use and project planning, to prioritize important resources for consideration and preservation; to identify and prioritize important questions; and to identify regional mitigation strategies to address direct, indirect, and cumulative impacts generated by major infrastructure projects.

DOD also reviewed its permitting policies and procedures. The Department of Defense Retrospective Review Plan Report, July 8, 2013, stated that the regulations, “Application Guidelines for Archeological Research Permits on Ship and Aircraft Wrecks under the Jurisdiction of the Department of the Navy,” (32 CFR Part 767) are being updated. The rule establishes a single permitting process for members of the public wishing to engage in activities on Department of the Navy ship and aircraft wrecks. The rule also incorporates provisions for a special-use permit to be issued in the case of

CREDIT: SHUTTERSTOCK



Mount St. Helens National Volcanic Monument on the Gifford Pinchot National Forest in Washington. In this report period, the U.S. Department of Agriculture began implementing its Final Sacred Sites Report, released in December 2012, by working more closely with tribal governments in the protection, respectful interpretation, and appropriate access to Indian sacred sites.



minimally intrusive operations such as sample collection or remotely-operated vehicle documentation of historic sites. In addition, the rule outlines penalties and enforcement procedures and provides an avenue for the public to access sites that are otherwise restricted from disturbance by the Sunken Military Craft Act (Title XIV of the FY 2005 National Defense Authorization Act, 118 Stat. 2094). Such access will allow research that can bring to light new information about the nation's maritime heritage and increase public knowledge of the U.S. Navy's history and service.

## CONSOLIDATION

GSA reports that in this reporting cycle a positive trend toward fewer new leases may indicate consolidation in federally owned buildings, from which vacancy-troubled legacy historic buildings could benefit. In addition, reduced property acquisition during the reporting cycle is another positive reflection of GSA efforts to reduce the footprint and make the most of available property, especially legacy historic buildings. As an example, the Department of State (DOS) needed to acquire space for its Security Training Center and decided to co-occupy Fort Pickett in Blackstone, Virginia, with the Virginia Army National Guard. Co-location is an exceptional fit and a welcome economic development for the rural area. GSA also reports five projects in 2014 to consolidate federal tenants in historic public buildings which will reduce reliance on leasing, shrink the federal footprint, and strengthen the Federal Buildings Fund:

- » John A. Campbell U.S. Courthouse, Mobile, Alabama
- » Lewis F. Powell Jr. U.S. Courthouse and Annex, Richmond, Virginia
- » Frank E. Moss U.S. Courthouse, Salt Lake City, Utah
- » Hubert Humphrey Federal Building, Washington, D.C.
- » Mary E. Switzer Federal Building, Washington, D.C.

## MASTER PLANNING

Ideally, federal agencies are making their decisions about how to consolidate office and warehouse space in the context of a master plan that includes an inventory of historic properties and consideration of the potential effects of consolidation efforts like mothballing, demolition, leasing, and disposal on historic properties through the Section 106 process.

Two agencies were recognized for their integration of historic preservation concerns in the Facilities Modernization Plan for the Patuxent Research Refuge, established in 1936. While the plan provided for the demolition of approximately 80 buildings, both historic and non-historic, through the Section 106 process, FWS and the U.S. Geological Survey (USGS) committed to public interpretation programs. Accessible at the newly completed National Wildlife Visitor Center, the video, exhibit, guided tours, and brochure tell the story of both the natural and cultural significance of the property and its development over time. In honoring the two federal agencies with the "Outstanding Stewardship of Historic Properties by a Government Agency"

## CASE STUDY

### Facility Planning For Preservation Outcomes

#### FEDERAL AGENCY

U.S. Armed Forces Retirement  
Home (AFRH)

#### LOCATION

District of Columbia



CREDIT: LIBRARY OF CONGRESS

Charles Magnus c. 1863 lithograph of the Soldiers' Home, Washington, D.C., now known as the Armed Forces Retirement Home

The AFRH is an independent federal agency that manages the nation's oldest continuously operating retirement community for veterans of the armed forces, at least one-half of whose service was not active commissioned service. AFRH owns and manages two campuses—in Gulfport, Mississippi, and Washington, D.C.—with a mission to fulfill the nation's commitment to veterans by providing a premier retirement community, exceptional residential care, and extensive support services. The Washington facility (AFRH-W) is a 272-acre campus located in the northwest quadrant of the District of Columbia. The entirety of the AFRH-W campus is an eligible and listed historic district in the NRHP and the District of Columbia Inventory of Historic Sites. Within the campus are also the United States Soldiers' and Airmen's Home NHL and the President Lincoln's Cottage and Soldiers' Home National Monument.

AFRH is a financially independent agency, does not receive appropriations from Congress, and is sustained by a permanent trust fund (Trust Fund) that

was established in the late 19th century. As the character of military action continues to evolve, future residents at AFRH will have different medical and accessibility requirements than past and current residents. Therefore, AFRH must modernize its facilities to address the changing needs and challenges of veterans from recent conflicts. AFRH must also provide its residents with facilities designed to reflect the latest standards and practices in senior housing and healthcare. As AFRH's infrastructure continues to age, rising costs of maintenance and operation of historic buildings competes with the agency's responsibility to provide services to residents. In response, the AFRH has made comprehensive efforts to plan for preservation outcomes while supporting its mission, which could serve as a model for all property managing agencies responsible for the stewardship of "campus like" historic districts.

The 2008 AFRH-W Master Plan identified historic buildings and structures available for transfer, lease, or sale. Areas for lease and development were identified

based on the agency's goals to increase operational and programmatic efficiency by consolidating all current residential operations in the campus core and eliminating duplicative functions that are currently distributed throughout the campus. As of FY 2014, AFRH is prioritizing the leasing of vacant space within historic buildings. AFRH has successfully leased buildings and spaces to individuals, government entities, schools, and non-profit organizations. One of the most successful examples is the Cooperative Agreement AFRH maintains with the National Trust for Historic Preservation, providing the opportunity for some 30,000 members of the public to visit the Lincoln Cottage and Visitor Center (Building 10—Administration Building) each year.

Concurrent with the development of its Master Plan, the agency adopted the AFRH-W Historic Preservation Plan as its guiding document for compliance with the NHPA and for the protection of the AFRH-W Historic District. The preservation plan establishes policies, actions, and procedures that ensure

preservation is integrated into the agency's daily operations.

AFRH monitors its historic resources through the implementation of the agency's standard operating procedures, specifically those stipulated in the AFRH-W Historic Preservation Maintenance Program. Facilities management contractors and the Cultural Resource Manager complete specified daily, monthly, and annual monitoring actions. The maintenance plan provides consistent guidelines for maintenance and monitoring, allowing coordination of data gathered from multiple sources. In addition to the monitoring actions, this program outlines standard operating procedures for cyclical, emergency, and daily maintenance activities.

In FY 2011, AFRH drafted a 10-year Capital Improvement Plan (CIP) for both

campuses based on the 2008 Master Plan. The CIP captures all anticipated capital improvements through FY 2021, and proposes each project as part of a broader agency program or goal. Historic preservation and stabilization is one of the five agency programs supported and implemented through these capital improvements, accounting for 21 percent of proposed projects for AFRH-W. The Cultural Resources Manager participated in all phases of the preparation of the CIP. Thus the stewardship of historic properties is an integral part of the 10-year plan as created and implemented.

In 2011 and 2012, as part of the recovery effort from the August 2011 earthquake that struck the mid-Atlantic region, AFRH coordinated with contractors to stabilize immediately the Sherman Building, one of the most iconic buildings on the AFRH-W campus. Over a period of 10

months, more than 3,000 exterior stones were reconstructed on the Sherman Building as structural, plaster, ornamental, and roof repairs were completed. A custom structural steel frame was constructed within the previously unreinforced clock tower; more than 20 courses of marble were deconstructed and reconstructed to accommodate the frame. The extensive deconstruction of the clock tower not only allowed for a long-term repair of the building but also taught contractors and the agency about the original construction methods and practices. In May 2014, the AFRH was recognized for its efforts by the District of Columbia State Historic Preservation Officer's Award for Excellence in Preservation.

2013 Maryland Preservation Award, the Maryland State Historic Preservation Officer praised FWS and USGS for demonstrating outstanding stewardship by enthusiastically embracing the opportunity to expand their mission beyond natural resource interests. As a result of their efforts, visitors to the Refuge are now exposed to the cultural values of the property and can engage in exploring and understanding the site's history and development over time.

In another example, Fort Hunter Liggett in California contracted USACE to prepare a maintenance manual for “The Hacienda,” a historic property listed in the NRHP. The maintenance manual:

- » Presents preservation planning concepts in a jargon-free format geared to non-preservation professionals at the installation level;
- » Is linked to the Internet to allow easy updates and accessibility – general photographs, maintenance issues, and identification of intrusive design issues are hyperlinked in the manual and accessible at <https://www.flickr.com/photos/fhlhacienda/sets/>;
- » Provides a clear explanation of what is important and why and how to keep it that way;
- » Recognizes the Army's role in the history of the structure in addition to that of William Randolph Hearst;
- » Integrates cyclical maintenance and historic preservation; and
- » Recommends preservation priorities for future rehabilitation of character-defining features that will enhance visitor experience.

## LEASING AND OTHER COST SHARING APPROACHES

Many agencies are exploring opportunities to outlease historic buildings and structures to achieve preservation goals, minimize federal maintenance costs, and, in some cases, generate federal revenue. For example, VA has used its authority (38 U.S.C. §§ 8161—8169) for EULs whereby VA-owned property may be leased for use by a non-federal entity to provide veterans' services. In the past, the scope of eligible veterans' services was broad, but in this reporting cycle, Congress limited new EULs to those providing for transitional housing for homeless veterans.

In 2012, the National Trust for Historic Preservation honored The Pioneer Group, the lessee of Building 19 at the Leavenworth VA Medical Center in Kansas. The combination of a National Historic Landmark, a group of grassroots preservationists, and an innovative public-private partnership made the newly restored Leavenworth Building 19 possible. When officials proposed demolition of the abandoned 1886 dining hall, concerned citizens formed Veterans Administration Leavenworth Opportunity for Reuse or “VALOR.” VALOR and developer, The Pioneer Group, worked tirelessly with VA to find alternatives to demolition. With the investment of private funds, historic features were preserved, insensitive alterations were removed, and modern office



amenities were added. Leavenworth Building 19 now houses a new VA medical records office that brought 400 jobs to town.

The U.S. Coast Guard (USCG) also reports that it has successfully outleased historic lighthouses to responsible parties that assume management duties, undertake restoration and maintenance, and make the properties available for public access.

During this reporting cycle, GSA reports using the leasing authority of Section 111 of the NHPA to great effect. The most significant success was the 60-year ground lease of the 1899 Old Post Office in Washington, D.C., to the Trump Organization. This long-term lease permits the utilization of the federal historic tax credit to leverage the private capital necessary to rehabilitate the building as a 270-room luxury hotel while maintaining its exceptional historic attributes and ensuring no adverse effect to this city focal point and symbol of the preservation movement. Visitors will enjoy access to restaurants in the nine-story historic atrium, invigorated sidewalks with open air cafes, and re-opened access to the 315-foot bell tower offering panoramic views of the nation's capital.

GSA reports that the allocation of Section 111 lease revenues for the benefit of historic properties in its portfolio is an important aspect of this authority. Although modest compared to GSA's other capital investment programs, strategically invested outlease revenue makes an important difference for many historic buildings unable to compete for prospectus level funding. Combined with other funding sources, such as private investment and historic tax credits, Section 111 leases can fill critical gaps, enabling GSA to address historic material repairs and seize opportunities to meet federal stewardship goals. In FY 2013, GSA conducted a review which resulted in the recoding of \$1.8 million in outlease revenue, increasing the funds in the program for the year by 34 percent.

In 2013, the National Trust for Historic Preservation published "Historic Leasing in the National Park System: Preserving History through Effective Partnerships." The report identifies some of the barriers that are currently preventing greater use of the Section 111 leasing authority and other partnership tools, describes examples of the successful use of long-term leases to facilitate private investment with historic tax credits within NPS units, and provides recommendations for moving forward more effectively. NPS reports it continues to lease historic properties in accordance with its procedures at 36 C.F.R. Part 18, as authorized both by Section 111 of the NHPA and Section 802 of the National Parks Omnibus Management Act of 1998 (16 U.S.C. § 1a-2(k)). These procedures are supported by "Historic Property Leases and Cooperative Agreements" (Section 5.3.3), Management Policies, 2006, and Director's Order 38: "Real Property Leasing." Expanded use of historic leasing could help abate the multi-billion dollar NPS maintenance backlog for under-utilized and unused buildings and structures.

One of the approaches FS has developed to save underutilized historic buildings is its Cabin Rental Program, providing overnight recreation accommodations to the public for a fee. Cabins, fire lookouts, and small lodges have been restored with period furniture to offer an affordable heritage tourism experience for the public. While this has been a successful, cost sustaining endeavor, growth is impeded by limited resources

and funding. As of 2014, there were 445 buildings and structures in the Cabin Rental Program. An analysis of the inventory indicates a potential of 4,000 to 6,000 historic buildings and structures that could be converted to overnight accommodations. FS reports it is considering policy changes for private use of historic buildings and structures to encourage private investment, but establishing the authority to do so may take several years.

In this reporting cycle, VA and FS requested the ACHP to assist them in considering the use of Section 111 leasing authority. As recommended in the 2012 Report to the President, the ACHP has and will continue to consult with VA, FS, GSA, NPS, and National Trust for Historic Preservation on the effective use of Section 111 to ensure preservation of historic properties.

## DEMOLITION AND DISPOSAL

In accordance with the “Freeze the Footprint” policy, any growth in total office or warehouse space must be offset by a corresponding decrease through declaration of excess, disposal, or closed/realigned as part of a DOD BRAC process. Most importantly, OMB policy states that an agency may not use as an offset property that the agency has “mothballed” or those subject to EULs and outleases. So while reuse by the controlling agency or transferring the property to another federal agency may address both the footprint and historic preservation policies, a preservation outcome such as an outlease—EUL, Section 111, or other authority—is often in conflict with the footprint policy. Even when outleases present an opportunity to leverage non-federal investment in the maintenance and continued use of buildings and structures imbedded in federal facilities or otherwise unsuitable for disposal, such outleases may not be considered as an offset. As a result, this policy has led agencies that believe new buildings or structures may be needed now or in the future to pursue demolition and disposal, regardless of whether historic properties may be adversely affected. While the “Freeze the Footprint” policy seems on its face to encourage reuse, it has actually had the opposite effect, encouraging the demolition of historic buildings and structures imbedded in federal facilities.

For example, CBP reports significant challenges in its continued use of its historic facilities. As the agency mission and law enforcement standards and methods have changed, the space and layout requirements for facilities have also changed. In addition, deferred maintenance has increased the life-cycle costs for older facilities. Expansion in place may not be feasible when a port of entry is constrained by the border and surrounding urban development. In such cases, CBP is apt to choose new construction and demolish, excess, or dispose of a historic facility for the footprint offset.

In an unusual example, USGS is combining a demolition and new construction project with a historic preservation outcome. It is currently demolishing a “rabbit-warren” of building additions to the historic U.S. Lifesaving Service Station at Hammond Bay Biological Station in Millersburg, Michigan. The Lifesaving Service Station will be restored to its historic appearance. Meanwhile, a new laboratory is being built on the site to centralize and modernize the lab functions with a zero net gain in square footage.

In this reporting cycle, agencies have experienced both challenges and success in the disposal of historic properties. GSA issued new agency guidance on disposals in 2012. The disposal of historic properties requires market analysis to determine if conveyance with preservation restrictions is feasible. As a result, sometimes disposal of a historic property is a two-step process with a preliminary solicitation to identify the preservation conditions that the market may bear. GSA and USCG also reported on the success of the Federal Property and Administrative Services Act of 1949 and the National Historic Lighthouse Preservation Act disposal processes for lighthouses. In the 14 years since its establishment, GSA has successfully conveyed more than 100 lighthouses with preservation protections through the program. USCG noted this program typically takes five or more years to accomplish each transfer of a historic lighthouse, whereas a typical public auction of a non-historic lighthouse or other property can be completed in three months. However, according to GSA, the time to complete a lighthouse conveyance is affected more by climate and seasonal timing than its historic status and the corresponding disposal authority. GSA's data indicates that conveyances under both authorities for historic and non-historic lighthouses are similar, usually within 12–24 months.

The Indian Health Service (IHS) noted that the majority of its historic properties are located on Indian trust lands, such that excess property is offered to the Indian tribe. It often takes five or more years to determine the disposition of any buildings or structures, and, in the meantime, they are vacant and not maintained. Similarly, BIA reports that excess properties under its control are located on Indian reservations and so cannot be transferred to any other organizations or entities other than the tribes. If tribes do not desire the buildings, the only option is demolition. Even in cases where tribes request transfer of buildings, costs associated with repairs and the remediation of hazardous materials often prohibit tribes from accepting them.

Similarly, BIA reports that, beginning in 2002, a new school construction program was initiated on many reservations in an effort to address deficiencies in the educational facilities. The ARRA also infused additional funds into new school construction. This resulted in the abandonment of some older school buildings and related structures which were no longer needed, many of which are considered historic. Since the re-use of these buildings is limited by the cost of repairs and hazardous materials remediation and security considerations, many of these buildings have been identified for demolition.

Since 2008, USPS has increased its rate of disposals, in part to generate revenue and stem maintenance investments that will help address the self-supporting agency's financial crisis. The agency reports that leasing is not feasible, but that often it is able to transfer historic properties out of federal ownership with covenants it believes ensure long-term historic preservation, and cites examples in California, Connecticut, Illinois, Kansas, Michigan, New Jersey, New York, and Pennsylvania in the reporting period. The ACHP and other stakeholders have found that the USPS covenants are often inadequate to ensure long-term preservation. The USPS has been challenged to manage the Section 106 process for these undertakings and in two locations, litigation has been filed challenging the agency's compliance with Section 106. (See the Case Study in Chapter 2)

A few agencies have acquired lands during the reporting cycle. The Tennessee Valley Authority (TVA) reported that it acquired 1,253 acres to expand the Cumberland Fossil Plant reservation. After acquisition, it discovered the new lands included a property listed in the NRHP, Hollister House. The agency subsequently determined that the historic house and its 4.7 acre parcel were excess to its needs, and now it proposes to dispose of the property with a historic preservation covenant. TVA reports that the agency has learned from this experience and improved staff awareness of historic preservation issues and directed consideration of available historic preservation data prior to acquisition.

## CLIMATE CHANGE

While some agencies did not identify climate change as a significant issue or program, others noted that their agency has a Climate Change Adaption Plan and/or is concerned with the viability of its facilities in vulnerable locations. For example, the Department of Health and Human Services (HHS) reports that, while the current 2012 HHS Climate Change Adaption Plan does not specifically address impacts to historic properties, it is being updated. A section concerning historic properties is expected to be added to the plan.

The BOR reports that it completed a Section 106 review and executed a Programmatic Agreement with Tahoe National Forest, USACE, and the California SHPO regarding the Stampede Dam Safety of Dams Modifications Project. BOR will increase the height of Stampede Dam by 11.5 feet to accommodate 110 percent of the Probable Maximum Precipitation, so the agreement will resolve the adverse effects to more than a dozen historic properties behind the dam that would be inundated if the reservoir were filled to capacity.

FS reports it has identified high elevation archaeological sites, formerly protected by snow and ice fields, among its most vulnerable historic properties to climate change. Fragile artifacts such as baskets and other organic items are well preserved when they remain in a dry case or frozen under deep snow and ice. The melting of snow and ice fields caused by climate change now exposes these artifacts which begin to decay rapidly if not recovered by archaeologists. FS has partnered with several universities to survey and record exposed and vulnerable sites. FS reports that, while exposure of artifacts has provided new insights into human behavior at high altitudes, the rate of melting will result in more loss of information than gain.

In this reporting cycle, NPS reported the most robust comprehensive planning effort regarding protecting historic properties from the effects of climate change. In 2011, the agency implemented a GIS project using existing inventory data to identify historic properties vulnerable to sea level rise and prioritize them for documentation by the Historic American Building Survey/ Historic American Engineering Record/ Historic American Landscape Survey based on their risk assessment. In October 2012, many NPS parks in the Northeast Region, notably Ellis Island and the Statue of Liberty, were devastated by Hurricane Sandy, necessitating a mobilized response. These efforts were followed by a Director's Memorandum, "Climate Change and Stewardship of Cultural Resources" (2014), requiring all identified cultural resources to be evaluated in terms of their vulnerability and significance so that management decisions are directed to resources that are both significant and most at risk. In addition, NPS provides leadership



in the historic preservation community on preparing for the impacts of climate change. In 2014, the agency hosted more than 70 federal, state, local, non-profit, and university leaders at its “Preserving Coastal Heritage Work Session” to draft a decision framework for managing vulnerable cultural resources impacted by climate change.

## MANAGING ASSETS

Federal agencies continue to manage historic properties in their ownership by adaptively reusing them, rehabilitating and restoring them, and protecting them. Maintaining historic buildings and structures in “good” condition remains a challenge for federal agencies, even as they define “good” in accordance with their own standards. Agencies report that, according to their respective real estate management systems, the following proportions of the historic properties in their ownership are in “good” condition:

- » BIA: 36 percent of its 259 historic properties (with various contributing resources)
- » BLM: 52 percent of its 421 historic buildings and structures
- » CBP: “vast majority” and “no properties in a state of collapse or with structural failure”
- » NASA: 100 percent of its 261 historic properties (with various contributing resources)
- » Centers for Disease Control (CDC): 100 percent of its two historic properties (with various contributing resources)
- » Food and Drug Administration (FDA): None (historic property maintained in “fair” condition)

NPS reported the condition of its historic properties based on comprehensive condition assessments on a five-year revolving cycle in terms of the calculated Facilities Condition Index (mathematically, the deferred maintenance value divided by the number of properties). In this scale, an Index of 0.000 is a property in “perfect” condition, while a value equal to or greater than 1.000 indicates a property for which the cost of maintenance equals or exceeds its replacement value. NPS reports that 11,935 of its historic buildings, structures, and cultural landscapes require \$4.6 billion in deferred maintenance resulting in an average Index of 0.052. Adaptive reuse, rehabilitation, and restoration of historic buildings and structures may seem similar to a lay person, but they typically differ by degrees of change to the characteristics qualifying the historic property for the National Register. But all three approaches have successfully accomplished the goal of preserving federal historic properties.

## HIGHLY TECHNICAL HISTORIC PROPERTIES

Federal agencies are often challenged to continue to use and adaptively reuse historic buildings and structures associated with highly technical systems and programs. All of the agencies with historic properties significant for their association with medical care and research—VA, IHS, AFRH, and National Institutes of Health (NIH)—report challenges adapting those properties for modern medical care and research activities. NIH reports that the nature of scientific research has changed over the seven decades of

its Bethesda, Maryland, campus' history, and it is often not feasible to adapt insufficient floor plate areas, column spacing, or ceiling heights for current mechanical systems. IHS reports that upgrading, renovating, and maintaining historic buildings are not always the most effective or efficient use of funds, particularly with respect to energy efficiency, operational effectiveness, and maintainability. AFRH has similar concerns, but, through the development and implementation of a facility master plan that considers historic preservation stewardship, the agency has consolidated its footprint in the historic north end of the campus. Needs for "modern" space were accommodated in the demolition of the 1950s Scott Building, a non-contributing building in the historic district, and the construction of a new Scott Building. The LEED Gold certified new building opened in 2013 is 52 percent smaller and 30 percent more energy- and water-efficient per square foot than the old building. In addition to its "green design," it is more sensitive to and compatible with the design of the historic district.

The Federal Aviation Administration (FAA) faces similar challenges in managing the numerous communications, navigation, and surveillance systems constituting the National Airspace System (NAS). This highly technical "system of systems" is unique to FAA, would not be of practical use to other entities, or could endanger NAS integrity if used for other purposes. The locations of its buildings and structures, often embedded in secure airport facilities, do not lend themselves to use by others. As a result, FAA has rarely adaptively reused or leased such properties. Generally, they are demolished when determined excess.

NASA also reports that the "Freeze the Footprint" policy presents a major challenge, and NASA is actively working to "Reduce the Footprint," which routinely means demolition of older buildings and structures that do not meet current mission needs. Agency historic preservation staff has already seen an increase in the number of proposals to demolish historic structures and pressure to expedite the review of such proposals. This push to do more with less will inevitably impact additional historic properties, and even historic districts, as more mothballed and unused structures become ripe for disposition decisions.

Even in this environment, NASA has been able to reuse historic properties successfully. Current agency policy regarding Facilities Project Requirements (NPR 8820.2G) specifically requires that a facility project manager must develop an adaptive reuse feasibility report, in conjunction with the historic preservation officer, if a building is eligible for the NRHP and planned for modification or demolition. Some of the high-profile successes during this reporting cycle:

- » SpaceX will lease Historic Pad 39A at Kennedy Space Center in Florida for its commercial space program use. SpaceX will maintain the historic structure. This lease is part of the retirement of the Space Shuttle program, in which NASA transferred the Space Shuttle Orbiters for public viewing and interpretation to museums and visitor centers in Florida, California, New York, and Washington, D.C./Virginia. NASA also transferred the Shuttle Carrier Aircraft to the Johnson Space Center visitor center for public viewing and interpretation. NASA re-used the



The renovation and reopening of the historic Harbor Control Tower at Joint Base Pearl Harbor-Hickam was celebrated with a traditional Hawaiian blessing ceremony in 2014. The historic structure is a water tank and signal tower located near the Pearl Harbor Naval Shipyard that survived the attack on December 7, 1941.

CREDIT: NAVY

Shuttle Avionic Integration Laboratory for heritage tourism activities at the Johnson Space Center in Texas. (See the Case Study in Chapter 1)

- » The Air Force took control of the Space Transportation System Program building in Palmdale, California, and will re-use it.
- » NASA has re-purposed the gantry system, an NHL, at Langley Research Center in Virginia to operate a new Hydro Impact Basin for simulating Orion (America's new spacecraft for human exploration) splash down testing.
- » NASA modified Test Stand B-2, an NHL, at Stennis Space Center in Mississippi for reuse during testing of the Space Launch System.
- » NASA leased Hanger One, a historic former Navy dirigible hangar, at Moffett Federal Airfield in California to Google, Inc. for rehabilitation and continued use as a hangar.

## REHABILITATION FOR IMPROVED SUSTAINABILITY

In this reporting cycle, federal agencies emphasized successes in rehabilitating historic properties for continued use while also meeting energy efficiency and sustainability or “green design” goals set by EO 13514. One hallmark of highly green design is LEED certification by the U.S. Green Building Council. There are four levels of certification (from least to most green): Certified, Silver, Gold, and Platinum. While LEED certification is not required for federal buildings to meet the goals of EO 13514, some rehabilitation projects of historic buildings do achieve this hallmark. Some of the green planning design projects involving historic properties reported by agencies include the following:

- » NIH used ARRA funds to renovate Building 3 in the Historic Core District in Bethesda, Maryland. Originally, the Public Health Methods and Animal Unit Building, it was adaptively reused as offices for the nearby Clinical Research Center while restoring the Neo-Georgian brick façade, windows, and slate roof. The project is LEED Certified.
- » Beginning in 2002, FS rehabilitated its International Institute for Tropical Forestry in San Juan, Puerto Rico, melding energy efficiency, water conservation, and historic preservation. The project is LEED Gold certified. In May 2014, the Institute celebrated its 75th anniversary with the Spanish Colonial style building proudly displayed as its icon, symbolizing how natural resource conservation, environmental protection, and historic preservation are all part of an ethic embracing sustainability.
- » In November 2011, the Department of the Treasury rehabilitated the Treasury Building in Washington, D.C. By improving the building systems to address water efficiency, reduce energy, and indoor environmental quality improvement, the Department achieved LEED Gold certification while not affecting the qualifying characteristics of the NHL.

- » The NPS' National Center for Preservation Technology and Training (NCPTT) worked with BAC/Architecture + Planning, PLLC and Apollo BBC to undertake an "ecocharrette" on the National Register-listed Lee H. Nelson Hall, the Center's headquarters in Louisiana. The ecocharrette included an energy audit of the building and led to the development of a sustainability management plan, which can be used as a model for other existing and historic buildings. (<http://ncptt.nps.gov/blog/sustainability-management-plan-for-lee-h-nelson-hall-2014-03/>)

GSA, as a federal agency responsible for a large portfolio of historic federal buildings, has addressed the challenge of balancing historic preservation and green design at the highest policy level. GSA's Public Buildings Commissioner, in his message preceding the Section 3 progress report, writes:

"Since its founding 65 years ago, GSA has proven that the greenest building is the one already built. Reusing buildings and extending their service life creates a more sustainable federal government. Through innovative design, these buildings are modern, efficient, and inspiring workplaces that serve the missions of our client agency partners and the communities where the government does business."

In this reporting cycle, GSA provided several outstanding examples of historic federal buildings rehabilitated to meet the highest green standards, including the following:

- » The Hipolito F. Garcia Federal Building and U.S. Courthouse in San Antonio, Texas, earned GSA its first LEED Platinum certification.
- » The Wayne N. Aspinall Federal Building and U.S. Courthouse in Grand Junction, Colorado, is the agency's first net-zero energy building.

Other agencies reported smaller scale green design projects improving historic properties. In one such example, the U.S. Marine Corps installed photovoltaic panels at the Home of the Commandants, an NHL at the Marine Corps Barracks in the District of Columbia.

## OTHER HISTORIC PROPERTY MANAGEMENT

While most federal agencies struggle to fund required and needed inventories of historic properties, a few are able to fund studies with value across federal agencies. The Albuquerque District in New Mexico of USACE reported on two such studies:

- » In the Cochiti Deviation Artifact Movement Study, USACE seeks to understand better the direct impacts of periodic inundation and individual water deviations on artifact scatters, while also assessing the cumulative impacts of multiple events over time. During the five-year study, completed in 2013, Corps archaeologists observed the movement of metal washers of various sizes placed in the field to simulate prehistoric artifacts. As water levels fluctuated, naturally and from Corps actions, artifact locations were monitored and data was recorded about horizontal and vertical movement. The results of this study will provide a valuable baseline set of data useful for resource managers in the future, with specific focus on the effects of erosion, deposition, and spatial displacement of surface artifacts in periodically inundated environmental zones.



## CASE STUDY

### Historic Federal Buildings Go Platinum and Net-Zero

#### FEDERAL AGENCY

U.S. General Services Administration (GSA)

#### LOCATION

Texas and Colorado



The historic Wayne N. Aspinall Federal Building and U.S. Courthouse in Grand Junction, Colorado, was rehabilitated, certified LEED Platinum, and is GSA's first target net-zero site.

In two recent rehabilitation projects, GSA was able to achieve the highest standards in sustainability and energy efficiency while also preserving historic federal buildings. These benchmark sustainability and historic preservation projects also contribute to downtown historic preservation efforts in their respective cities by maintaining the federal presence and the foot traffic of federal employees and users of federal services.

At the **Hipolito F. Garcia Federal Building and U.S. Courthouse** in San Antonio, Texas, GSA seized opportunities to restore significant spaces while making the most of the legacy building's historic features and sustainability potential.

The building is an important landmark and symbol of continued federal presence in the downtown. Situated across from the historic Alamo, the building holds a

prominent position in Alamo Plaza, one of the city's three major plazas. The building was a product of the Federal Public Works programs enacted to relieve widespread unemployment during the Great Depression of the 1930s. A skillful example of Beaux-Arts classicism, the U.S. Post Office and Courthouse is indicative of the federal government's goal of expressing democratic ideals through classically derived architecture featuring grand scale, symmetry, and refined details. The U.S. Post Office and Courthouse is located in the Alamo Plaza Historic District. In 2000, the building was individually listed in the NRHP.

A green roof, photovoltaics to fuel the building's hot water; window and HVAC improvements, and smart building systems that respond to changing daylight and temperature conditions earned the project GSA's first LEED Platinum rating,

with no adverse effects on the building's architecturally significant qualities. The project included an educational display on the history and architecture of the building, as well as its new sustainability features, encouraging agency tenants to conserve energy.

Geothermal heating and cooling facilitated by the City's granting of an alley easement, increased insulation, highly efficient lighting, 385 rooftop photovoltaic solar panels, and state-of-the-art building controls transformed the 1918 **Wayne N. Aspinall Federal Building and U.S. Courthouse** in Grand Junction, Colorado, into GSA's first target net-zero site. Through iterative refinement of the solar array design, the project maintained the historic appearance of the building's neoclassical façade while earning GSA's second LEED Platinum rating.



CREDIT: CAROL M. HIGHSMITH PHOTOGRAPHY, INC./GSA

Interior of Wayne N. Aspinall Federal Building and U.S. Courthouse, Grand Junction, Colorado

The Aspinall Federal Building and Courthouse is architecturally significant as an important example of an Italian Renaissance Revival style government building designed by Supervising Architect of the Treasury James Wetmore in 1918 with a significant addition in 1940 by Wetmore's successor, Louis A. Simon. In addition, it is historically significant because

of its association with an important U.S. congressional leader, Wayne N. Aspinall.

The project also restored character defining spaces and features that had been compromised over the building's 96-year-life. The main lobby—which had been reduced to a small entry vestibule—has been restored to its original grandeur;

exposing original arched windows, decorative column capitals, a marble-bordered terrazzo floor; and a three-story-high curved stair that had been hidden behind a wall. GSA also restored the building's historic limestone and brick façades and ornamental metals, based on historic documentation.

- » In the five-year Cerrito Recreation Area Site Protection Measure Study, USACE aims to assess the impact of increasing recreational access to an archaeological site and to empirically evaluate the effectiveness of specific site protection techniques in minimizing, or even decreasing those impacts to a site located in an intensively used, public recreation area.

A few agencies have also been able to accomplish restoration or reconstruction projects to benefit historic properties. For example:

- » Arlington National Cemetery completed the first phase to restore two historic gates. Constructed in 1879 of salvaged pieces of the demolished north portico of the War Department Building (1812-1820), the Ord-Weitzel and Sheridan Gates stood for nearly 100 years as points of entry into the cemetery. The gates were constructed of blocks from the same Aquia sandstone quarries used to build the White House. In 1971 when the cemetery expanded into Fort Myer, roads were widened and the gates were dismantled. Column sections, bases, entablatures, and urn caps were relocated to a forested area where they remained outdoors for more than four decades. In 2012, the components were inventoried and moved to a staging site for analysis. The cemetery contracted the Technical Center of Expertise for the Preservation of Historic Structures and Buildings, Seattle District of USACE for forensic testing of the stone to determine damage and level of needed repair, and developed alternatives for restoration and reconstruction. In the project's next stage, the components will be cleaned and repaired, missing features carved of new stone, and plans drawn for reinstallation of the gates.
- » The California Department of Transportation, congressionally delegated for the Federal Highway Administration (FHWA), and VA completed the restoration of the historic fence and gates of the San Francisco National Cemetery in California. Necessitated by improvements to Doyle Avenue, the project included the reconstruction of a medallion missing from the gates.

## CONTRIBUTING TO THE ECONOMY

Several federal policies encourage federal agencies to maintain or select sites for their facilities in central cities and rural town centers to strengthen the vitality and livability of the communities in which federal facilities are located. Further, agencies should place emphasis on examining the reuse potential of historic buildings and locating appropriate new buildings in historic districts. This reuse makes the most efficient use of already constructed buildings, supports preservation of historically significant structures, and promotes local economic development (See EO 12072, "Federal Space Management," 1978; EO 13514; and Department of Transportation, "Implementing Instructions-Sustainable Locations for Federal Facilities," 2011). While the ACHP's experience with the various federal agencies demonstrates that they accept these principles, the progress reports submitted did not articulate the local economic benefits of rehabilitating, adaptively reusing, or consolidating federal leases in a historic building.

Some agencies, like NPS, FS, and BLM include heritage tourism in their mission. These agencies routinely balance heritage tourism goals with other agency missions in the

management of their existing, and, in some cases, expanding properties. The FY 2015 National Defense Authorization Act, enacted in December 2014, includes a number of expansions to federal property. For instance, several new national parks will be created, including the Blackstone River Valley National Historical Park (Rhode Island), the Harriet Tubman National Historical Parks (New York and Maryland); and the Manhattan Project National Historical Park (New Mexico, Tennessee, and Washington).

On the other hand, other agencies find it difficult to connect historic preservation efforts at their facilities with local economic opportunities. The DOD comments are a representative type of response explaining how federal property access limitations present challenges to heritage tourism and economic development:

DOD limits access to installations based on security concerns, although there are procedures in place to allow access if requested. For example, the Santa Elena National Historic Landmark may be accessed by coordinating with installation staff. Access to Traditional Cultural Properties (TCPs) and archaeological sites is limited both to protect the sites from possible relic hunters and because these areas are often located within active training areas.

Other agencies report funding and other obstacles that limit their appreciation of the economic power of their historic properties. BIA reports it does not have a heritage tourism program to promote its historic properties. This is largely because the majority of the properties continue to be operational facilities. In addition, because these properties are also located within Indian reservations, the promotion of historic properties through heritage tourism is dependent on the values and interests of the respective tribes.

*Measuring Economic Impacts of Historic Preservation*, a report prepared under contract with the ACHP by PlaceEconomics, with funding from DOC, was published in 2011. In fulfilling the recommendation in the 2012 Report to the President, the study was updated and published with statewide and other economic impact studies in 2014 at [www.achp.gov/economicstudies](http://www.achp.gov/economicstudies). The study included an extensive literature review of the preservation-economics link; interviews with parties in the public, private, and non-profit sectors; and an international symposium. The report found:

- » Aspects of historic preservation have substantial economic benefits and costs, but they remain imperfectly understood and only partially documented.
- » Research into the relationship between economics and historic preservation is critically needed.
- » There are multiple constituencies for this information, many of whom need the data and information presented in different forms.
- » Information must be consistent and credible, and its collection and dissemination ongoing.
- » While the research and methodologies require scholarly robustness, the information needs to be presented in non-academic terms.



- » While government needs to play an important role in data collection, analysis, and dissemination, it will probably be necessary for a number of private as well as public institutions to gather and evaluate the data.
- » However, there will need to be one entity that is responsible for annually releasing relevant metrics on a predictable basis.

The report recommended a public-private collaboration involving federal agencies, non-federal parties, and academic institutions to create a long-term research, evaluation, and reporting plan; establish the baselines for indicators; systematize data collection; and undertake ongoing research and data collection. To date, no such formal collaboration with the federal government has been initiated to implement these recommendations, but non-federal parties and academic institutions continue to work in this area.

While federal agencies continue to struggle to articulate the economic impacts of their historic preservation activities, they continue to report with appropriate pride about their efforts to share the knowledge and experience of federal historic properties with the public in the course of daily business or in special events.

As an example, USGS supported the “Let’s Move Outside” initiative ([www.letsmove.gov/lets-move-outside](http://www.letsmove.gov/lets-move-outside)) by hosting an all-day fish derby for children with special needs at the historic Leetown Science Center in West Virginia. Also the Center, established in 1930 as the U.S. Fisheries Experimental Station, hosted 100 local seventh and eighth grade students to learn about the history of the facility and the science of brook trout and fish diseases.

In another example, USACE partnered with Black Rock Historical Society and Black Rock-Riverside Alliance to host the Centennial Celebration open house at the Black Rock Lock and Canal in New York. The event included guided tours of the lock, an interactive virtual lock model, historic photos and displays, information booths, and vintage music. Exhibitors at the event included the Black Rock Historical Society, Buffalo Maritime Center, Friends of the Buffalo Story, Lower Lakes Maritime Historical Society, and Preservation Buffalo Niagara. Twenty-seven artists sketched, painted, and photographed the historic lock, and their finished works were displayed at the open house and in a local gallery exhibit.

## BUILDING PARTNERSHIPS

Federal agencies report on many partnerships with other federal agencies. The technical assistance provided by NPS and USACE to the federal family has generated knowledge and historic preservation outcomes in this reporting cycle. Federal agencies also frequently point to their consultative relationships with SHPOs, fundamental to the effective application of the Section 106 process for federal undertakings with the potential to affect historic properties. Some federal agencies also discuss their

## CASE STUDY

### Measuring the Economic Effects of Federal Historic Preservation

#### FEDERAL AGENCY

National Park Service (NPS)

#### LOCATION

Nationwide



View of the commercial district within Harpers Ferry National Historical Park, West Virginia

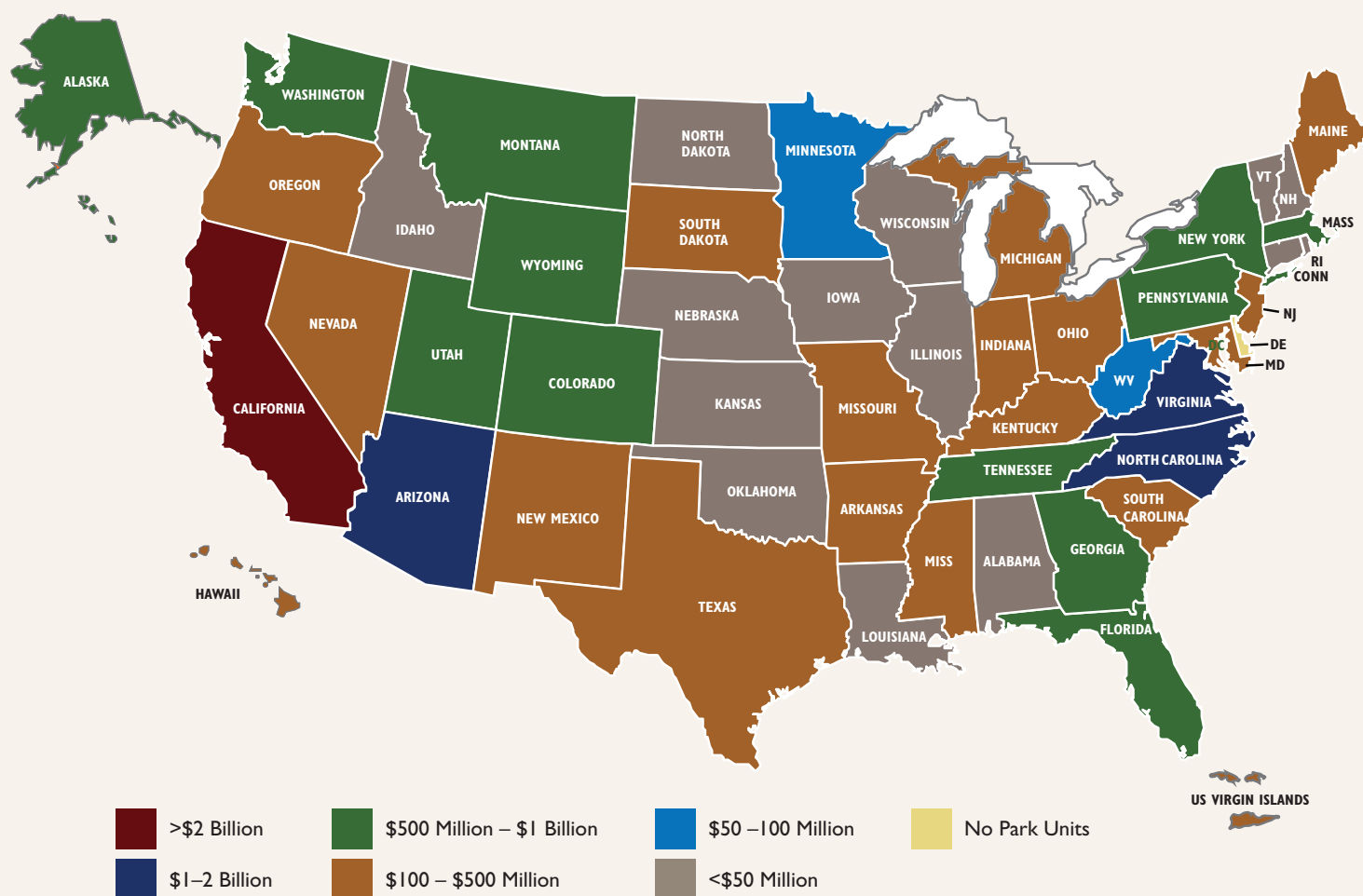
The National Park Service recognizes the connection between its investments in the preservation of historic properties in its ownership with the economic benefits of heritage tourism. While not all NPS park units feature historic properties or can characterize their visitors primarily as “heritage tourists,” many can. In its report, “2013 National Park Visitor Spending Effects: Economic Contributions to Local Communities, States, and the Nation,” the authors found that national parks play a major role in attracting and sustaining local businesses and communities. Prepared by economists Catherine Cullinane Thomas and Christopher Huber of the U.S. Geological Survey and Lynne Koontz of NPS, the report states that in 2013

visitors spent more than \$14.6 billion in communities near national parks, a sum that translates into 238,000 local jobs.

NPS also reports that visitor spending data exists for each of the national parks, which shows the tremendous economic benefit that national park visitation provides to communities in terms of employment and sales. For example, in Calendar Year 2013, Boston African American National Historic Site hosted 386,084 visitors who spent \$21,280,800 in the local community. The direct effects of this spending include sales, income, and jobs in businesses selling goods and services directly to park visitors. In addition, visitor spending at this park generated 285 jobs.

According to a 2012 study that NPS commissioned the consulting firm Tripp Umbach to conduct, the Essex National Heritage Area in Massachusetts annually contributed \$153.8 million in economic impact, helped support 1,832 jobs, and provided \$14.3 million in tax revenue. Additionally, the same study also found that combined together, the 21 National Heritage Areas in the Northeast Region produced an annual economic impact of \$5.4 billion, supported more than 66,880 jobs, and provided \$602.7 million in tax revenue.

More information about the NPS Visitor Spending Effects Model is available online. ([www.nature.nps.gov/socialscience/economics.cfm](http://www.nature.nps.gov/socialscience/economics.cfm))



Created from data in “2013 National Park Visitor Spending Effects: Economic Contributions to Local Communities, States, and the Nation,” Natural Resource Report NPS/NRSS/EQD/NRR—2014/824

consultative relationships with Indian tribes, but rarely are these relationships described as “partnerships.” A few agencies are able to make use of volunteers and consider these important partnerships with their constituency. Finally, a few agencies reported partnerships with non-federal parties to identify, protect, and use historic properties in this reporting cycle. Several examples from the BLM report:

- » Partnered with the Imperial Valley Desert Museum in Ocotillo, California, to rehouse all BLM artifacts (more than 20,000) under their care and supervision. Completed in 2013, the effort required the time of three BLM interns, 3,000 hours of volunteer time, and assistance from the local Girl Scout troop.
- » Consulted with the Fort Mojave Indian Tribe to identify historic properties of significance to the tribe in Arizona. In the Mohave Valley Ethnographic Study, BLM is partnering with University of Washington and the Aha Macav Cultural Society to conduct interviews with tribal elders and traditional practitioners which will contribute to the completion of traditional cultural property nomination forms.
- » Established new SiteWatch chapters in Carlsbad and Hobbs, New Mexico. SiteWatch trains volunteers to monitor archaeological sites and install anti-looting/anti-vandalism signs.
- » Partnered with Coppin State University, in accordance with Executive Order No. 13256, “President’s Board of Advisors on Historically Black Colleges and Universities,” and published “Finding History’s Forgotten People: The Presence of African Americans in the Settlement of Colorado, c. 1434 to 1954.”

GSA reports how it was able to partner with a SHPO and local preservation organization to ensure the preservation of a significant historic property. In Montgomery, Alabama, two of the Civil Rights Movement’s most significant buildings stand side by side. One is an elegant federal courthouse, from which U.S. District Judge Frank M. Johnson Jr. presided over crucial civil rights cases. The other is a modest Greyhound bus station where in 1961 young Freedom Riders used nonviolent methods to protest segregation. In the 1990s, GSA began planning for the expansion of the Federal Building and U.S. Courthouse. Recognizing that the bus station’s location next to the Frank M. Johnson courtroom offered unique opportunities for interpreting a shared history, GSA, the Alabama Historical Commission, the U.S. District Court, and members of the Greyhound Bus Station Advisory Committee devised a plan to preserve the bus station—and GSA agreed to lease the station to the Historical Commission for a small fee. In 2011, the Freedom Rides Museum opened to the public, and in October 2012, the partners received the National Trust for Historic Preservation/ACHP Award for Federal Partnerships in Historic Preservation.

TVA reports it has established “A Thousand Eyes” archaeological outreach program, through which volunteers receive formal training in monitoring select archaeological sites on TVA land. TVA expects this pilot program to begin in 2015.

The NPS reports that, more than 246,000 volunteers donated 6.7 million hours of service to national parks at a total value of \$134 million in 2013. The Urban Archeology Corps is an eight-week summer work program for diverse youth, ages 15-25, and is a

CREDIT: USS MIDWAY MUSEUM



Students enjoy the USS *Midway* Museum in California in a program sponsored in part by the U.S. Navy.



## CASE STUDY

### Preservation Through Disposal and Partnership

#### FEDERAL AGENCY

General Services  
Administration (GSA)

#### LOCATION

District of Columbia



CREDIT: OLBN, INC./COURTESY GSA



GSA restored and partners with the new building owner and the National Museum of Civil War Medicine to provide public access to Clara Barton Missing Soldiers Office, Washington, D.C.

Through an innovative disposal transfer, operating agreement, and public-private partnerships, the Clara Barton's Missing Soldiers Office Museum in the District of Columbia, opened to the public in 2014 with minimal federal funding.

The Clara Barton Missing Soldiers Office was originally rediscovered by GSA in 1996,

when the building housing it was scheduled for demolition. Located on 7th Street, NW, the site is the location where Clara Barton lived during and immediately after the Civil War. She used this property not only as a place to live but also to store the supplies she received for her work on the battlefield, and later as an office to handle correspondence concerning missing soldiers.

Based on the discovery of the significance and integrity of the historic property and as a result of Section 106 consultation, GSA was able to reconsider its plans to demolish the building, and, instead, the agency sold the property in 2001 to Jefferson at Penn Quarter, LLP, retaining a preservation easement on the façade and portions of the interior. The grantee



agreed to stabilize, adaptively reuse for museum and commercial use, and allow public access to the third floor spaces occupied by Barton which would be restored by GSA as a museum.

In 2005, JPI Development completed an \$8 million stabilization and rehabilitation, which added a rear elevator, egress stairs, toilets, a replicated façade, basic buildings systems, and fire suppression. In 2007, JPI sold the property to Douglas Development, which assumed responsibility for maintenance of the exterior in perpetuity and base building system operating costs.

GSA's imaginative redevelopment met the community's need for increased residential density while taking advantage of the building's proximity to mass transit, museums, and entertainment. GSA managed the \$1.8 million museum quality conservation and selective restoration, completed in 2013, using sales proceeds set aside for Square 457 mitigation and historic building outlease funds.

Completed by a minority-owned, small business known for its accomplishments in cutting-edge historic building documentation, preservation, and sustainability, the restoration also

employed an array of small business subcontractors as conservators, craftsmen, and fabricators to retrofit spaces once used by Barton with mechanical, electrical, and plumbing systems for the first time. Under an operating agreement with GSA, the National Museum of Civil War Medicine is funding museum exhibits, educational programs, marketing, and daily operations ([www.civilwarmed.org/clara-barton-museum/about-clara-bartons-missing-soldiers-office/](http://www.civilwarmed.org/clara-barton-museum/about-clara-bartons-missing-soldiers-office/)).

collaboration with Groundwork Anacostia River DC. Participants are exposed to a broad range of what archaeology and historic preservation “look like” in the parks. In 2014, nine participants explored Fort Dupont Park, Anacostia Park, Fort Chaplin Park, and Fort Mahan Park, among others, researching the history of these parks and conducted archaeology and oral history interviews under the theme “Changing Landscapes.” Participants focused on the changing landscape of the parks and the surrounding neighborhoods. They also conducted archival research, archeological excavation, artifact processing, and site visits to numerous and varied NPS park units. Finally, these youth participated in training workshops, including Allies for Inclusion Diversity, Oral History, Videography/Photography, and GPS/GIS.

The Science and Technology Directorate of DHS reports that it partners with lighthouse and military history enthusiasts to allow exterior tours of Plum Island Lighthouse and Fort Terry. This agency also recently partnered with the Southold Historical Society to publish, “A World unto Itself: the Remarkable History of Plum Island, New York.”

Unfortunately, partnerships for historic preservation are not always successful. The National Cemetery Administration of VA reports that in the reporting cycle two partnerships intended to rehabilitate and reuse two historic buildings have failed:

- » VA issued a 20-year Revocable License for Non-Federal Use of Real Property to the Keokuk Historic Preservation Commission in 1999. The partner was to rehabilitate and reuse the 1871 historic lodge at Keokuk National Cemetery in Iowa as a welcome center and museum/war memorial using state grant funds. The partner gutted the building, but work ceased in 2010. In May 2012, VA revoked the license and contracted with NPS to mothball the building.
- » VA executed a 10-year lease with the Soldiers Home Foundation in 2010. The partner committed to rehabilitate and reuse the historic 1929 “Roundhouse” at Wood National Cemetery in Wisconsin as a reception space. Although the required consultation with the SHPO appears to have been initiated by the partner, no work has been completed to date, and the building’s condition has deteriorated.

## SUMMARY

The 2014 progress reports received by the ACHP on federal agency efforts to identify, protect, and use historic properties demonstrate continued program improvement and detail the efforts agencies make to manage properties in accordance with the goals of the NHPA and EO 13287. While many challenges remain and new opportunities are emerging, the ACHP notes significant progress in the integration of historic property data and concerns into agency planning with historic preservation outcomes.



## CHAPTER 4: FINDINGS AND RECOMMENDATIONS

**THIS CHAPTER CONTAINS THE ACHP’S FINDINGS** regarding the current state of federal historic property management and recommendations for improvements to be implemented over the next three years. While the primary basis for these conclusions are the 2014 progress reports submitted by federal agencies, these findings are also informed by the ACHP’s extensive interaction with federal agencies and preservation partners in daily activities.

The 2014 progress reports reaffirmed that federal real property portfolios include a broad and diverse range of historic properties that can only be effectively managed with a similarly diverse set of protocols, procedures, and other tools. Agencies have acknowledged that strategies for the management of one property type or even one specific property may not be applicable to others, and the original uses of historic properties, especially those of a scientific or technical nature, present obstacles to adaptation for current needs. While most agencies have tools and procedures at their disposal that are sufficiently diverse to prepare them for most challenges, many agencies continue to encounter situations that cannot be effectively addressed by current business models or standard federal practices. The ACHP will continue to encourage federal agencies to review their policies and procedures for real property management to ensure they are adequately flexible to provide for historic preservation outcomes.

In 2015, the Veterans Health Service (VA) completed the Section 106 review of its long-range development plan for the historic San Francisco VA Medical Center, California, with the execution of a Programmatic Agreement to guide future undertakings.

The ACHP will continue to encourage federal agencies to review their policies and procedures for real property management to ensure they are adequately flexible to provide for historic preservation outcomes.

While many agencies are improving the management and condition of their historic properties, others face challenges when historic preservation is outside their core mission. For agencies that have successfully integrated stewardship into their strategic plans, the preservation, enhancement, and sustainable use of historic properties have proven to be assets for meeting mission needs. Historic properties have also proven to be energy efficient, sustainable, and often adaptable and resilient to climate change.

The 2014 progress reports continue to demonstrate that historic preservation initiatives which involve partnerships with non-federal entities can bring social and economic benefit to both agencies and local communities. While some agencies are articulate regarding their partnerships with state, tribal, and local communities and the private sector, others do not describe such partnerships or demonstrate awareness of the opportunities they offer. Improved awareness of and appreciation for the social and economic value of partnerships will foster better management practices that will benefit these agencies, historic properties, and the American people.

The following findings and recommendations are the priorities the ACHP will address to improve the federal preservation program and respond to emerging issues in the management of historic properties.

#### FINDING NO. 1: FEDERAL PROPERTY CONSOLIDATION AND REALIGNMENT

*Integrating historic property stewardship in federal agency strategic planning for the consolidation and realignment of real property portfolios improves historic preservation outcomes.*

When an agency maintains comprehensive inventory data on the historic properties in its ownership and utilizes this data in the consultation process for Section 106 compliance, the agency can make informed decisions about which buildings, structures, and areas of land to utilize and in what manner. Historic properties are more likely to be deemed an asset by an agency when considered in this proactive manner.

Agencies are improving their ability to integrate inventory data into real property data management systems, including the FRPP. Continued investment of resources in this area, along with clear guidance from the FRPC, is building the foundation for improved strategic management of federal historic properties in the future. In order to create efficiencies in infrastructure permitting and review and to improve environmental outcomes, a national inventory of historic properties, managed by State and Tribal Historic Preservation Officers in collaboration with NPS, would not only address infrastructure permitting needs but also be useful for real property managing agencies in their program and project planning. Funding for this critical effort is included in the FY 2015 Administration budget (See Budget Data Request No. 13-32: Infrastructure Permitting (2013)).

Federal agencies have been actively identifying real property for disposal and demolition in this reporting cycle. Many of these properties include historic buildings and structures. Excess acreage may also contain archaeological sites, cultural landscapes, or other properties of religious or cultural significance to Indian tribes or Native Hawaiian



organizations. Agencies continue to report, as they did in 2011, that the identification of real property for disposal is not generally informed by historic property inventory data or stewardship values. As a result, the agency often only begins considering the significance of any historic properties and the potential reuse of historic buildings and structures after the property is identified for disposal, which may limit the range of alternatives available for the agency to consider. More agencies would benefit from strategic plans that encourage consideration of these values prior to a disposal proposal.

The challenge of reusing historic buildings and structures is particularly acute when those buildings and structures are associated with a highly technical or scientific mission. Once that mission is obsolete, the properties associated with it are often viewed as obsolete as well. In 1991, the ACHP published guidance, “Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities.” ([www.achp.gov/pubs-scitech](http://www.achp.gov/pubs-scitech)) While this guidance is largely still applicable, agencies would benefit from access to more recent success stories of creative adaptive reuse of these specialized historic properties.

In some cases, however, agencies have determined it is not feasible to dispose of a historic property or that the stewardship responsibilities require the retention of federal ownership. It is often not feasible to dispose of an unused building or structure embedded in a federal facility when the parcel cannot be separated and made accessible for disposal to a non-federal party. In such cases, some agencies have found that outleases—as authorized by an EUL authority, Section 412 of the General Provisions Consolidated Appropriations Act, or Section 111 of the NHPA—are effective tools to offset costs of historic properties while ensuring the long-term preservation and stewardship of historic properties. These outlease solutions can result in historic preservation outcomes, yet agencies face some impediments to using this option.

As reported in the 2012 Report to the President, Section 412 allows GSA to create outlease-leaseback relationships with private companies that provide the capital to preserve and upgrade important historic buildings. However, budget scoring rules, developed jointly by OMB, the Congressional Budget Office, and the House and Senate Budget Committees require the government costs for the entire lease term to be financed up front in the first year of the lease. This requirement has limited GSA’s ability to use private financing to leverage the equity value of government assets, resulting in greater cost to taxpayers. Greater flexibility with the application of the budget scoring rules for Section 412 leases would enable GSA to pursue the long-term cost benefits and other advantages of federal ownership and keep these important federal buildings occupied and viable.

In addition, according to OMB’s “Freeze the Footprint” guidance, a federal agency shall not increase on an annual basis the size of its domestic real estate inventory, measured in square footage, for space predominately used for offices and warehouses. Any growth in total office or warehouse space must be offset by a corresponding decrease through declaration of excess, disposal, or closed/realigned as part of a DOD BRAC process. An agency may not use as an offset properties that the agency has “mothballed” or those subject to EULs and outleases, including Section 412 and Section 111 leases. This guidance discourages agencies from pursuing outleasing as a preservation option for

An agency may not use as an offset properties that the agency has “mothballed” or those subject to enhanced use leases and outleases, including Section 412 and Section 111 leases. This guidance discourages agencies from pursuing outleasing as a preservation option for unused historic properties.



unused historic properties. Federal agencies reported that the application of the “Freeze the Footprint” guidance, in the absence of historic preservation-informed strategic planning, has resulted in the demolition of many historic buildings and structures that might have been useful to non-federal parties and could have self-supported their costs through a Section 412 or Section 111 lease. This policy, which may be intended to encourage reuse, has actually resulted in demolition and disposal without ensuring the preservation of many historic properties. The current policy does not achieve an appropriate balance between historic preservation stewardship and the need to limit the footprint of the federal government.

### To Address This Finding the ACHP Will:

- » Continue to advise the FRPC on the collection of data related to historic properties in the FRPP.
- » Work collaboratively with NPS, State Historic Preservation Officers, and Indian tribes to develop and coordinate a national inventory of historic properties, to create efficiencies in infrastructure permitting and review, and improve environmental outcomes both on and off federal land (In FY 2015 Administration Budget; See also Budget Data Budget Data Request No. 13-32: Infrastructure Permitting (2013)).
- » Continue to advise federal agencies on best practices that encourage proactive and useful inventory data collection to provide opportunities for the protection and use of historic properties.
- » Advise Congress and the Administration on the implications of legislative proposals to codify federal property management initiatives on historic properties and encourage proper integration of historic preservation consideration and values.
- » Continue to provide guidance and success stories demonstrating how highly technical and scientific historic properties are adaptively reused by federal agencies.

### Recommendations for Others:

- » Federal agencies should request adequate funding to identify historic properties on federal land to meet the requirements of Section 110 of the NHPA.
- » The Administration should continue its support for and Congress should appropriate funding for a national inventory of historic properties to create efficiencies in infrastructure permitting and review and to improve environmental outcomes both on and off federal land (In FY 2015 Administration Budget; See also Budget Data Request No. 13-32: Infrastructure Permitting (2013)).
- » Federal agencies should ensure complete and accurate historic property inventory data is collected and considered before real property consolidation decisions are made, including the decision to leave a historic property unused.
- » OMB, in consultation with GSA, the ACHP, and other affected agencies, should re-examine the application of Section 412 scoring rules as applied to historic buildings

and pursue changes to leverage equity value and facilitate the outlease of important federal historic properties.

- » OMB, in consultation with GSA, the ACHP, and other affected agencies, should consider changes to the “Freeze the Footprint” offset guidance to increase flexibility for long-term, self-supporting Section 111 and Section 412 leases of historic properties to non-federal parties.
- » GSA, NPS, and VA should continue to collaborate with the ACHP to encourage federal agencies to use existing federal leasing and reuse authorities, including Section 111 and Section 412, to use federal historic properties to promote economic development.

## FINDING NO. 2: ENERGY EFFICIENCY AND SUSTAINABILITY

*Agencies would benefit from examples of creative solutions developed for “green design” rehabilitation projects of federal historic buildings and structures.*

As noted in 2012, the Administration continues to advocate for a federal government and workforce that reduces energy consumption and increases energy efficiency. In this reporting cycle, agencies are continuing to apply the requirements of the Energy Independence and Security Act of 2007 and EO 13514 and to pursue “green design” solutions in all their real property decision making.

While many agencies continue to struggle to view historic assets as sustainability assets, some agencies have demonstrated that historic buildings can be used to meet federal energy and efficiency goals. Historic buildings and structures in federal ownership were often constructed to high standards in part due to the availability of high quality materials, access to local craftsmen, and relatively low cost of skilled labor when constructed. They were also typically constructed to be responsive to local climates. Agencies should continue to consider the strong reinvestment potential of historic buildings and structures, that, once rehabilitated, support modern energy efficiency goals and long life-cycle use. Federal historic buildings and structures are often in “sustainable locations,” as defined by the Department of Transportation in its EO 13514 guidance, with access to existing utilities and transportation. For these reasons, historic properties can play an important part in the energy efficiency and sustainability future of the federal government.

Federal agencies are incorporating green design solutions in a wide variety of new construction and rehabilitation projects. Some agencies have used the standards developed by the U.S. Green Building Council (USGBC) and its LEED certification process for guidance on energy performance improvements for specific historic properties. In 2012, the ACHP and NPS participated in the USGBC update process for the LEED rating system, advocating for acknowledgement of the durability of historic buildings, materials, and systems. GSA has demonstrated that a rehabilitated federal historic building can meet the highest standards for green design, achieving LEED Platinum certification. It is important to note, however, that green design may meet the goals of energy efficiency and sustainability, but not be LEED certified.

Agencies should continue to consider the strong reinvestment potential of historic buildings and structures, that, once rehabilitated, support modern energy efficiency goals and long life-cycle use.

The National Trust for Historic Preservation and other private sector preservation partners continue to develop valuable research and resources regarding the sustainable qualities of historic buildings and structures. These resources may be of use to federal agencies, particularly when considering reinvesting in a historic property for continued use or adaptive reuse.

#### To Address This Finding the ACHP Will:

- » Work with CEQ's Steering Committee on Federal Sustainability and collaborate with GSA and NPS (specifically, the National Center for Preservation Technology and Training) to collect stories of successful green rehabilitation of historic buildings and structures of all sizes and share them with federal agencies.
- » Partner with CEQ, Environmental Protection Agency, GSA, National Trust for Historic Preservation, National Conference of State Historic Preservation Officers, and other parties to disseminate private-sector energy efficiency and sustainability research and solutions for historic properties to federal departments and agencies.

#### Recommendations for Others:

- » Federal agencies planning and designing energy efficient and sustainable buildings and structures, including those seeking LEED certification, should acknowledge the durability of historic buildings, materials, and systems and consider reusing historic properties when feasible.

### FINDING NO. 3: CLIMATE CHANGE AND ADAPTION

*Systemic efforts by federal agencies to identify and prepare for the threats of climate change and to maximize the resilience of historic properties are necessary stewardship responsibilities.*

In this reporting cycle, federal agencies prepared Climate Change and Adaption Plans as required by EO 13653. These plans provide an inventory and assessment of proposed and completed changes to their land- and water-related policies, programs, and regulations necessary to make watersheds, natural resources and ecosystems, and the communities and economies that depend on them be more resilient to climate change. However, in these plans, most agencies did not address the potential threats of climate change to historic properties in their ownership nor actions the agency could take to prepare historic properties to be more resilient.

One reason such consideration of historic properties was not included in the plans is that EO 13653 did not specifically require it. While the Preserve America EO and NHPA support the understanding that historic properties are integral parts of the “communities and economies that depend on them” as referenced in EO 13653, without the specific requirement to consider historic properties, most federal agencies did not include such consideration in their plans.

There is no doubt that the effects of climate change may be detrimental to historic properties. Historic buildings and structures in coastal storm impact zones or river floodways face the threat of wind and water damage as those events increase in frequency.

Threats to federal historic properties need to be considered with the same rigor as the stewardship of watersheds, natural resources, and ecosystems.

Archaeological sites in floodways are also threatened by erosion which can lead to loss of integrity and increased potential for looting or vandalism. Historic battlefields and traditional cultural landscapes may be damaged by federal efforts to fight wildfires as cycles of drought contribute to more of those events. Such threats to federal historic properties need to be considered with the same rigor as the stewardship of watersheds, natural resources, and ecosystems. In addition, since many government office buildings and warehouses are historic properties, the consideration of historic properties should also be part of agency plans to maintain operations in adverse conditions.

In its invitation to the ACHP to join the Council on Climate Preparedness and Resilience established by EO 13653, CEQ acknowledged “many of the United States’ iconic landmarks and heritage sites are at risk to the impacts of climate change” (October 31, 2014). In participating in this Council, the ACHP brings its knowledge of federal historic property stewardship gained from Section 3 reporting and its understanding of non-federal historic preservation concerns gained from its membership, partners, and experience in Section 106 consultations. The ACHP also is looking for opportunities to integrate climate change policies and planning with the Unified Federal Review process, Federal Infrastructure Permitting and Review Process Improvements, and other related initiatives. Participation on the Council by the chairman of the ACHP along with other senior officials of federal agencies provides an opportunity for the ACHP to continue to advocate for consideration of historic properties in climate change preparedness and resilience at the appropriate policy level.

#### To Address This Finding the ACHP Will:

- » Advocate through its participation in the Council on Climate Preparedness and Resilience, other related initiatives, and daily activities regarding federal historic property stewardship to help ensure that policy and planning for climate change preparedness and resilience adequately address preservation of America’s irreplaceable historic properties.

#### Recommendations for Others:

- » The Administration should direct federal agencies to review their existing Climate Change and Adaption Plans to identify threats to historic properties and incorporate strategies to prepare to protect those properties and to maximize their resilience.

### FINDING NO. 4: FEDERAL PRESERVATION PROGRAMS IN THE 21<sup>ST</sup> CENTURY

*Agency-wide historic preservation policies and leadership commitment to their implementation create a culture of stewardship, facilitate the allocation of resources to meet responsibilities, and improve preservation outcomes.*

In the 2009 Report to the President, the ACHP found “Agency strategic plans, which are prepared by senior policymakers to assist in fulfilling the agency’s mission, still frequently do not address historic property management needs or establish goals for improvement

at the appropriate level.” In the 2012 Report to the President, the ACHP added to this finding, “As a result, many agencies find it difficult to identify adequate resources to effectively resolve conflicts between NHPA and other statutory requirements.” The 2014 progress reports support the need for the integration of historic preservation into agency policies and planning as well. The ACHP’s experience with a variety of agencies demonstrates that greater frequency and success regarding historic preservation outcomes is more likely when agencies have integrated stewardship into strategic planning. The preservation success stories highlighted in this report—especially the NASA, AFRH, and GSA case studies—each demonstrate an agency culture where historic properties are protected, enhanced, and used as agency assets.

Section 3(e) of the Preserve America EO requires each agency to maintain a designated SPO at the assistant secretary, deputy assistant secretary, or equivalent level. Engaged SPOs are positioned to provide agency-wide leadership to develop and implement policies that integrate historic preservation into strategic planning, encourage reuse of historic buildings and structures, and maximize opportunities to partner with appropriate state, local, and tribal governments and other non-federal parties to meet historic preservation goals. SPOs are also positioned in the agency to ensure the allocation of adequate funds and personnel for historic preservation programs and to facilitate the development of creative cost-sharing approaches with partners. When SPOs provide leadership to integrate the policies, procedures, and practices of the NHPA and the Preserve America EO into their agency program activities, historic preservation and their agency mission are more efficiently and effectively advanced as envisioned in Section 1 of the EO.

As discussed in Finding No. 1 of this report, to meet the requirements for the identification and evaluation of historic properties in Section 110 of the NHPA, agencies report that more funding and personnel are needed. These proactive identification efforts are necessary to inform agency real property strategic planning and advise non-federal parties—such as energy developers, energy transmission providers, and transportation agencies and providers—who may propose undertakings on federal lands.

Without such data, agencies continue to report that most efforts to identify and protect historic properties are conducted as part of or as a result of Section 106 reviews. This reactive planning process requires consideration of means to avoid, minimize, and mitigate adverse effects of federal undertakings on historic properties with non-federal stakeholder input. When the Section 106 process is initiated late in the planning process, as is often the case, complete avoidance of adverse effects to historic properties may not be a viable alternative. Improved data at the outset of the process and early initiation of the Section 106 review process maximizes opportunities for historic preservation outcomes as well as avoiding the costs and time delays often associated with consideration of historic preservation issues at the eleventh hour.

Federal efforts to meet Sections 106 and 110 of the NHPA are improved when agencies provide for the participation of representatives of diverse communities. The changing demographics of America pose opportunities as well as challenges for the national historic preservation program. The diversity of cultures in our country shape and enrich the American experience, and the federal government can continue to encourage



wider involvement and representation in determining what historic sites are worthy of recognition and preservation; how history and cultural heritage should be valued, interpreted, and preserved; and how we can ensure the American public as a whole can take advantage of the programs and tools created under the NHPA.

The ACHP notes that several federal agencies with significant inventories of historic properties did not submit progress reports as required by the Preserve America EO, or submitted well after the September 30 deadline (See Appendix C of this report). These reports are a critical tool for the ACHP, DOI, and the Administration to understand trends and patterns in the stewardship of historic properties in federal ownership. Effective compliance with the EO and pursuit of its goals can help advance important Administration policies and initiatives.

### To Address This Finding the ACHP Will:

- » Continue to develop and implement performance measures to assess the overall effectiveness and efficiency of the Section 106 process and to survey practitioners' experience in complying with the requirements of the Section 106 regulations.
- » Consistent with its 2014 Strategic Plan, continue to issue guidance and provide education, training, and outreach to support the effective participation of stakeholders and the public in the Section 106 process and to promote the effective consideration of historic preservation concerns in federal program and project planning.
- » Encourage other federal agencies to build a preservation program more inclusive of the diverse communities and culture of the nation.

### Recommendations for Others:

- » Designated SPOs should provide agency leadership to integrate the policies, procedures, and practices of the NHPA and the Preserve America EO into their agency program activities so that historic preservation and their agency mission are more efficiently and effectively advanced as envisioned in Section 1 of the Preserve America EO.
- » The Administration should reaffirm the purpose and intent of EO 13287 and encourage federal agencies with real property responsibilities to document their progress by submitting a comprehensive and timely triennial report to the ACHP and the Secretary of the Interior.

## SUMMARY

As they continue to examine their historic preservation programs to determine how to maintain, strengthen, and improve their stewardship and productive use of historic properties, federal agencies are encouraged to support the ACHP in implementing these recommendations. Agencies should continue to establish and meet specific, measurable goals for improving their efforts to identify, protect, and use historic properties and report on their progress in addressing these challenges and implementing these recommendations in 2017, the next reporting cycle.



CREDIT: FS

The historic and rehabilitated International Institute of Tropical Forestry in San Juan, Puerto Rico, is LEED Gold certified and symbolizes how natural resource conservation, environmental protection, and historic protection are all part of the Forest Service sustainability ethic.

## CHAPTER 5: TOWARD A COMMON GOAL

The Preserve America EO requires each agency with real property management responsibilities to prepare a triennial report on its progress in identifying, protecting, and using historic properties in its ownership and to make the report available to the ACHP and the Secretary of the Interior. These reports are vital to the improvement of federal historic properties management. They assist the ACHP and the Administration in measuring the progress and commitment of agencies in achieving the goals of the NHPA and the EO and formulating effective strategies, and they contribute to the ACHP's ability to report triennially to the President.

The 2014 Section 3 progress reports represent the fifth round of reporting by federal agencies under EO 13287 and continue to demonstrate a clear commitment to improve federal stewardship of historic properties. Agency reports provide information on historic property inventories in accordance with the goals of NHPA and EO 13287 and demonstrate examples of successes in integrating historic preservation and sustainability goals. While challenges remain, the ACHP notes significant progress in the integration of historic property data and concerns into agency planning with historic preservation outcomes.

As federal agencies strive to carry out their responsibilities under Section 110 of the NHPA and to develop and update existing comprehensive inventories of historic properties in the 21st century, many are identifying properties with more diverse areas

of significance than ever before. Due to the passage of time, some properties which were not considered significant in the past may need to be re-evaluated in a new context. This evolution of significance requires agencies to think broadly when evaluating properties and to involve diverse stakeholders and potential preservation partners representing the communities and cultures that value them.

The changing demographics of America pose opportunities as well as challenges for the national historic preservation program. The diversity of cultures in the country shape and enrich the American experience. The federal government can continue to encourage wider involvement and representation in determining what historic sites are worthy of recognition and preservation; how history and cultural heritage should be valued, interpreted, and preserved; and how it can ensure the American public as a whole can take advantage of the programs and tools created under the NHPA. Through partnerships, agencies can leverage the investments and stewardship of the federal government with the enthusiasm and resources of diverse non-federal parties to meet historic preservation goals and ensure public access to important historic properties. The ACHP is pursuing efforts in all aspects of its work to build a more inclusive preservation program, and through those efforts encourage other agencies to do so as well.

The potential effects of climate change on historic properties may seem daunting to federal agencies. It is imperative that as stewards of historic properties, agencies plan to minimize the potential for disruption and loss and to maximize resiliency. Since 2012, the recovery from Hurricane Sandy has taught agencies many lessons, which are still being analyzed and shared, and the application of which will improve federal stewardship of historic properties.

The ACHP is committed to carrying out the identified recommendations of this report and working closely with other agencies that share a common commitment to this process over the next three years. On a daily basis, the Federal Property Management Section of the ACHP's Office of Federal Agency Programs works closely with federal property managers in meeting their responsibilities and improving preservation outcomes under Section 106 and 110 of the NHPA. In Fiscal Years 2015 through 2017, the ACHP will continue to partner with property managing agencies, SPOs, Federal Preservation Officers, and agency leadership to identify opportunities for greater protection of historic properties in federal ownership. It will also seek new partnerships to support Administration initiatives to advance federal identification, protection, and use of historic properties while meeting goals for sustainability, climate change and adaptation, and fiscal responsibility.

The required reporting under EO 13287 has proven to be a useful tool for identifying the current issues and status of federal historic property management and the progress federal agencies have made in meeting the goals of the NHPA and the EO. At its inception, the ACHP Report to the President was a milestone in federal stewardship. It provided the first opportunity for agencies to examine their own achievements and receive an independent evaluation from the ACHP of these efforts. This fourth triennial report has demonstrated that federal property managers are using EO 13287 to strengthen their preservation programs and inspire their own leadership to meet these goals. The ACHP anticipates that the recommendations within this report, once

The continued productive use of federal historic properties is a solution for energy efficient, sustainable, adaptable, and resilient real property needs.



## CASE STUDY

### Protecting Historic Properties From the Effects of Climate Change

#### FEDERAL AGENCY

National Park Service (NPS)

#### LOCATION

Nationwide



CREDIT: NPS

NPS is planning for climate change adaption and resiliency at the Casa Grande Ruins National Monument in Coolidge, Arizona.

Issued February 10, 2014, the NPS Director's memo, "Climate Change and Stewardship of Cultural Resources" addresses three key questions: (1) what is climate change adaptation for cultural resources; (2) how should the NPS make decisions related to cultural resources in light of climate change; and (3) how does the NPS communicate regarding climate change science and impacts. Among other provisions, it requires that all identified cultural resources be evaluated for their vulnerability and significance so that management decisions take into account those resources that are both significant and most at risk.

NPS, whose primary mission is to preserve America's natural and cultural heritage, is developing and implementing a cultural resources climate change response strategy that integrates cultural resource management with broad climate science, adaptation, mitigation, and communication

efforts. Cultural resources, which include archaeological sites, cultural landscapes, ethnographic resources, historic and prehistoric structures, and museum collections, have distinct considerations with respect to climate change. Most are fixed in place or derive much of their significance from the place within which they were created. Many are non-living, and all are unique. As a result, the capacity of cultural resources to adapt to changing environments is limited.

Impacts to cultural resources from climate change range from coastal erosion and storm damage to effects of wildfires, floods, melting permafrost, and more rapid deterioration due to changing rain and temperature patterns. Cultural resources have always been subject to these types of environmental forces. However, observed and projected climate change trends are a great concern as these forces accelerate, intensify, and

combine in new ways that are increasing the rate of loss of cultural resources. These trends heighten the urgency for the NPS to survey climate-vulnerable areas, develop appropriate preservation and documentation techniques, and learn from the history and prehistory these resources contain. With so many cultural resources entrusted to its care, NPS provides leadership nationwide in historic preservation and cultural resource management in regard to climate change.

Cultural resources are irreplaceable indicators of the wide array of lifeways, ideas, beliefs, practices, and experiences that, over time, have led to the world we live in today. The NPS strategy for cultural heritage and climate change addresses both the impacts of climate change on cultural resources as well as the many forms of information about human history and human-environment interactions they contain. NPS is working to adapt

Climate Change Response Program  
Cultural Resource Brief

National Park Service  
U.S. Department of the Interior  
Natural Resource Stewardship & Science  
Cultural Resources, Partnerships & Science

## Cultural Resources and Climate Change

### Background

Cultural resources, which include archeological sites, cultural landscapes, ethnographic resources, historic and prehistoric structures, and museum collections, have distinct considerations with respect to climate change. Most are fixed in place or derive much of their significance from the place within which they were created. Many are non-living, and all are unique. As a result, the capacity of cultural resources to adapt to changing environments is limited.

Impacts to cultural resources from climate change range from coastal erosion and storm damage to effects of wildfires, floods, melting permafrost and more rapid deterioration due to changing rain and temperature patterns. Cultural resources have always been subject to these types of environmental forces. However, observed and projected climate change trends are a great concern as these forces accelerate, intensify, and combine in new ways that are increasing our rate of loss of cultural resources. These trends heighten the urgency for the NPS to survey climate-vulnerable assets, develop appropriate preservation and documentation techniques, and learn from the history and prehistory these resources contain. With so many cultural resources entrusted in our care, the NPS provides leadership nationwide to their preservation and management in regards to climate change.

### Approach

Cultural resources are irreplaceable indicators of the wide array of lifeways, ideas, beliefs, practices, and experiences that, over time, have led to the world we live in today. The NPS recognizes both the impact of climate change on cultural resources as well as the many forms of information about human history and human-environment interactions they contain. The NPS works to adapt cultural resource stewardship, management, research, and interpretive practices to the challenges of climate change.


### Current Projects

#### Policy and Program Development

- Expansion of NPS Climate Change Response Strategy Goal 7 — Implement Cultural Resource Adaptation — into a comprehensive program plan that sets out the dual relationship of cultural resources and climate change — impacts on assets and information from.
- Engagement of park, regional, and program staff in the "Climate and Culture" community of practice.

#### Science

- Development of a handbook outlining the types of impacts observed and anticipated from climate change to all categories of cultural resources across each core region of the nation.



At Dry Tortugas National Park, rapid phenology of tree infestation must take into account projected sea level rise and increased storm intensity

- Ongoing inventory and research of artifacts exposed by melting high mountain ice patches, known as "ice patch archaeology"
- Integration of natural and cultural data in assessments of resource vulnerability to projected climate change trends.
- Incorporation of cultural resources into scenario planning training and park planning documents.
- Training and guidance on cultural resources research priorities and planning of landscape and multi-agency scales for federal, state, tribal, and other partners.

#### Coastal Adaptation Handbook

- Development of management options for vulnerable cultural resources in the coastal zone and linking of the decision frameworks to those for adjacent natural resources and infrastructure.

#### Telling Climate Stories

- Cultural resources are an integral part of NPS climate change story. Developing instructional products on the progression of climate change and engaging with long-term and ongoing relationships between humans and our environments will help park staff more fully share these impacts and lessons learned with park visitors.

#### More Information

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March 2013

NPS published its Cultural Resources and Climate Change Policy in March 2013.

cultural resource stewardship, management, research, and interpretive practices to the challenges of climate change.

Cultural resources are also an integral part of how NPS interprets climate change, including the Every Place has a Climate Story Initiative. Developing instructional products on the progression of climate change and engaging with long-term and ongoing relationships between humans and their environments will help park staff more fully share these impacts and lessons learned with park visitors.

During its "Preserving Coastal Heritage Worksession," which occurred in New York, April 3-4, 2014, NPS recognized it is at a critical juncture in this process and sought help and input from an invited

group of participants with real-world expertise in addressing the powerful impacts of climate change on the human environment.

More than 70 federal, state, local, non-profit, and university leaders met to discuss the decision process for managing cultural resources impacted by climate change. One of the goals of the work session was to create a draft decision framework that will help NPS choose realistic options for managing vulnerable cultural resources, including historic buildings and structures, cultural landscapes, archaeological sites, museum collections, and ethnographic resources. The first portion of this framework, focused on cultural landscapes, is currently planned for public release in spring 2015.



implemented, will further improve the efficiency and effectiveness of agency stewardship of historic properties.

The federal government will face unprecedented challenges in the next three years as it continues its efforts to reduce the size of its real property inventory and ensure the energy efficiency, sustainability, and climate change adaptability of its remaining portfolio. The continued productive use of federal historic properties is a solution for energy efficient, sustainable, adaptable, and resilient real property needs. Further, investment in them promotes economic development and community pride. The ACHP will continue to work with agencies to fulfill these goals and meet its own mission to promote the preservation, enhancement, and sustainable use of the nation's diverse historic resources, and advise the President and Congress on national historic preservation policy. The preservation of this irreplaceable heritage is in the public interest so that the cultural, educational, aesthetic, inspirational, and economic benefits will be maintained and enriched for future generations of Americans.

## APPENDIX A: EXECUTIVE ORDER 13287, PRESERVE AMERICA

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the National Historic Preservation Act (16 U.S.C. 470 et seq.) (NHPA) and the National Environmental Policy Act (42 U.S.C. 4321 et seq.), it is hereby ordered:

**SECTION 1. STATEMENT OF POLICY.** It is the policy of the Federal Government to provide leadership in preserving America’s heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government, and by promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties. The federal government shall recognize and manage the historic properties in its ownership as assets that can support department and agency missions while contributing to the vitality and economic well-being of the nation’s communities and fostering a broader appreciation for the development of the United States and its underlying values. Where consistent with executive branch department and agency missions, governing law, applicable preservation standards, and where appropriate, executive branch departments and agencies (“agency” or “agencies”) shall advance this policy through the protection and continued use of the historic properties owned by the federal government, and by pursuing partnerships with state and local governments, Indian tribes, and the private sector to promote the preservation of the unique cultural heritage of communities and of the nation and to realize the economic benefit that these properties can provide. Agencies shall maximize efforts to integrate the policies, procedures, and practices of the NHPA and this order into their program activities in order to efficiently and effectively advance historic preservation objectives in the pursuit of their missions.

**SEC. 2. BUILDING PRESERVATION PARTNERSHIPS.** When carrying out its mission activities, each agency, where consistent with its mission and governing authorities, and where appropriate, shall seek partnerships with State and local governments, Indian tribes, and the private sector to promote local economic development and vitality through the use of historic properties in a manner that contributes to the long-term preservation and productive use of those properties. Each agency shall examine its policies, procedures, and capabilities to ensure that its actions encourage, support, and foster public-private initiatives and investment in the use, reuse, and rehabilitation of historic properties, to the extent such support is not inconsistent with other provisions of law, the Secretary of the Interior’s Standards for Archeology and Historic Preservation, and essential national department and agency mission requirements.

**SEC. 3. IMPROVING FEDERAL AGENCY PLANNING AND ACCOUNTABILITY.**

(a) Accurate information on the state of Federally owned historic properties is essential to achieving the goals of this order and to promoting community economic development

through local partnerships. Each agency with real property management responsibilities shall prepare an assessment of the current status of its inventory of historic properties required by section 110(a)(2) of the NHPA (16 U.S.C. 470h-2(a)(2)), the general condition and management needs of such properties, and the steps underway or planned to meet those management needs. The assessment shall also include an evaluation of the suitability of the agency's types of historic properties to contribute to community economic development initiatives, including heritage tourism, taking into account agency mission needs, public access considerations, and the long-term preservation of the historic properties. No later than September 30, 2004, each covered agency shall complete a report of the assessment and make it available to the Chairman of the Advisory Council on Historic Preservation (Council) and the Secretary of the Interior (Secretary).

(b) No later than September 30, 2004, each agency with real property management responsibilities shall review its regulations, management policies, and operating procedures for compliance with sections 110 and 111 of the NHPA (16 U.S.C. 470h-2 & 470h-3) and make the results of its review available to the Council and the Secretary. If the agency determines that its regulations, management policies, and operating procedures are not in compliance with those authorities, the agency shall make amendments or revisions to bring them into compliance.

(c) Each agency with real property management responsibilities shall, by September 30, 2005, and every third year thereafter, prepare a report on its progress in identifying, protecting, and using historic properties in its ownership and make the report available to the Council and the Secretary. The Council shall incorporate this data into a report on the state of the Federal Government's historic properties and their contribution to local economic development and submit this report to the President by February 15, 2006, and every third year thereafter.

(d) Agencies may use existing information gathering and reporting systems to fulfill the assessment and reporting requirements of subsections 3(a)-(c) of this order. To assist agencies, the Council, in consultation with the Secretary, shall, by September 30, 2003, prepare advisory guidelines for agencies to use at their discretion.

(e) No later than June 30, 2003, the head of each agency shall designate a senior policy level official to have policy oversight responsibility for the agency's historic preservation program and notify the Council and the Secretary of the designation. This senior official shall be an assistant secretary, deputy assistant secretary, or the equivalent, as appropriate to the agency organization. This official, or a subordinate employee reporting directly to the official, shall serve as the agency's Federal Preservation Officer in accordance with section 110(c) of the NHPA. The senior official shall ensure that the Federal Preservation Officer is qualified consistent with guidelines established by the Secretary for that position and has access to adequate expertise and support to carry out the duties of the position.

#### **SEC. 4. IMPROVING FEDERAL STEWARDSHIP OF HISTORIC**

**PROPERTIES.** (a) Each agency shall ensure that the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties as Federal assets and, where consistent with

agency missions, governing law, and the nature of the properties, contributes to the local community and its economy.

(b) Where consistent with agency missions and the Secretary of the Interior's Standards for Archeology and Historic Preservation, and where appropriate, agencies shall cooperate with communities to increase opportunities for public benefit from, and access to, Federally owned historic properties.

(c) The Council is directed to use its existing authority to encourage and accept donations of money, equipment, and other resources from public and private parties to assist other agencies in the preservation of historic properties in Federal ownership to fulfill the goals of the NHPA and this order.

(d) The National Park Service, working with the Council and in consultation with other agencies, shall make available existing materials and information for education, training, and awareness of historic property stewardship to ensure that all Federal personnel have access to information and can develop the skills necessary to continue the productive use of Federally owned historic properties while meeting their stewardship responsibilities.

(e) The Council, in consultation with the National Park Service and other agencies, shall encourage and recognize exceptional achievement by such agencies in meeting the goals of the NHPA and this order. By March 31, 2004, the Council shall submit to the President and the heads of agencies recommendations to further stimulate initiative, creativity, and efficiency in the Federal stewardship of historic properties.

## **SEC. 5. PROMOTING PRESERVATION THROUGH HERITAGE**

**TOURISM.** (a) To the extent permitted by law and within existing resources, the Secretary of Commerce, working with the Council and other agencies, shall assist States, Indian tribes, and local communities in promoting the use of historic properties for heritage tourism and related economic development in a manner that contributes to the long-term preservation and productive use of those properties. Such assistance shall include efforts to strengthen and improve heritage tourism activities throughout the country as they relate to Federally owned historic properties and significant natural assets on Federal lands.

(b) Where consistent with agency missions and governing law, and where appropriate, agencies shall use historic properties in their ownership in conjunction with State, tribal, and local tourism programs to foster viable economic partnerships, including, but not limited to, cooperation and coordination with tourism officials and others with interests in the properties.

## **SEC. 6. NATIONAL AND HOMELAND SECURITY CONSIDERATIONS.**

Nothing in this order shall be construed to require any agency to take any action or disclose any information that would conflict with or compromise national and homeland security goals, policies, programs, or activities.

**SEC. 7. DEFINITIONS.** For the purposes of this order, the term “historic property” means any prehistoric or historic district, site, building, structure, and object included on or eligible for inclusion on the National Register of Historic Places in accordance with section 301(5) of the NHPA (16 U.S.C. 470w(5)). The term “heritage tourism”

means the business and practice of attracting and accommodating visitors to a place or area based especially on the unique or special aspects of that locale's history, landscape (including trail systems), and culture. The terms "Federally owned" and "in Federal ownership," and similar terms, as used in this order, do not include properties acquired by agencies as a result of foreclosure or similar actions and that are held for a period of less than 5 years.

**SEC. 8. JUDICIAL REVIEW.** This order is intended only to improve the internal management of the Federal Government and it is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person.

GEORGE W. BUSH  
THE WHITE HOUSE,  
March 3, 2003.

At the time this EO was issued, the National Historic Preservation Act (NHPA) was codified at 16 U.S.C. § 470 et seq. Effective December 19, 2014, the NHPA was moved to 54 U.S.C. § 300101 et seq. In accordance with Public Law 113-287 which authorized this change, a reference to an old title 16 provision is legally deemed to refer to the corresponding provision in the new title 54 (e.g., for Section 106 of the NHPA, 16 U.S.C. § 470f refers to 54 U.S.C. 306108).



## APPENDIX B: ADVISORY COUNCIL ON HISTORIC PRESERVATION MEMBERSHIP

### Chairman

Milford Wayne Donaldson (California)

### Vice Chairman

Vacant

### Expert Members

Terry Guen (Illinois)

Dorothy Lippert (District of Columbia)

Lynne Sebastian (New Mexico)

Robert G. Stanton (Virginia)

### General Public

Teresa Isabel Leger de Fernandez (New Mexico)

Bradford J. White (Illinois)

### Member of an Indian Tribe or Native Hawaiian Organization

Leonard A. Forsman (Suquamish Tribe, Washington)

### Governor

Vacant

### Mayor

Hon. Joseph P. Riley Jr. (Charleston, South Carolina)

### Architect of the Capitol

Secretary, Department of Agriculture

Secretary, Department of the Interior

Administrator, General Services Administration

Secretary, Department of Defense

Secretary, Department of Education

Secretary, Department of Homeland Security

Secretary, Department of Housing and Urban Development

Secretary, Department of Transportation

Secretary, Department of Veterans Affairs

Chair, National Trust for Historic Preservation

President, National Conference of State Historic Preservation Officers

Observer: General Chairman, National Association of Tribal Historic Preservation Officers

Observer: Secretary, Department of Energy

Observer: Administrator, Environmental Protection Agency

Observer: Chair, Council on Environmental Quality

Observer: Chair, National Alliance of Preservation Commissions

Observer: President, ACHP Alumni Foundation

## APPENDIX C: AGENCY SECTION 3 REPORTS SUBMITTED, 2004–2014

AGENCY	2004 baseline	2005 progress	2008 progress	2011 progress	2014 progress
Armed Forces Retirement Home (AFRH)		✓		✓	✓
Agriculture, Department of (USDA)					
Agricultural Research Service (ARS)	✓				
U.S. Forest Service (FS)	✓	✓	✓	✓	
Farm Services Agency (FSA)	✓	✓			
Natural Resources Conservation Service (NRCS)	■	✓	✓	*	
Rural Development	✓	✓	*	*	
Commerce, Department of (DOC)			✓	✓	
National Oceanic and Atmospheric Administration (NOAA)	✓	▲	▲	▲	
Defense, Department of (DOD)	✓		✓		■
United States Army Corps of Engineers (COE)				✓	✓
Education, Department of (ED)	*	*	*	*	
Energy, Department of (DOE)	✓	✓		✓	✓
Environmental Protection Agency (EPA)	✓	✓	✓	✓	✓
Federal Energy Regulatory Commission (FERC)	✓	✓			
General Services Administration (GSA)	✓	✓	✓	✓	✓
Health and Human Services, Department of (HHS)	✓	✓	✓	✓	✓
Homeland Security, Department of (DHS)	✓	✓	✓	✓	✓
Federal Law Enforcement Training Center	✓	▲	▲	▲	
Housing and Urban Development, Department of (HUD)	✓				

✓ Report filed by deadline September 30

■ Agency submitted draft or final progress report at time of production of the Report to the President.

\* Agency notified the ACHP that the provisions of Section 3 of EO 13287 did not apply to them because they did not own real property.

▲ Agency notified the ACHP that they will no longer file individual agency progress reports, but their information will be included in their parent department/agency progress report.

AGENCY	2004 baseline	2005 progress	2008 progress	2011 progress	2014 progress
Interior, Department of the (DOI)					
Bureau of Indian Affairs (BIA)	✓	✓	✓	✓	✓
Bureau of Land Management (BLM)	✓	✓	✓	✓	■
Bureau of Reclamation (BOR)	✓		✓	✓	✓
Fish and Wildlife Service (FWS)	✓	✓	✓	✓	✓
National Park Service (NPS)	✓	✓	✓	✓	■
United States Geological Survey (USGS)	✓	✓		■	✓
Justice, Department of (DOJ)	✓	✓	✓	■	
Federal Bureau of Prisons (BOP)	✓	✓	▲	▲	✓
Labor, Department of (DOL)	✓	✓	✓	✓	
National Aeronautics and Space Administration (NASA)	✓	✓	✓	✓	✓
National Archives and Records Administration (NARA)	✓	✓			
National Science Foundation (NSF)	*	*	*	*	
Nuclear Regulatory Commission (NRC)	*	*	*	*	
Small Business Administration (SBA)	*	*	*	*	
State, Department of (DOS)	✓				
Surface Transportation Board (STB)	✓				
Tennessee Valley Authority	✓			✓	✓
Transportation, Department of (DOT)					
Federal Aviation Administration (FAA)	✓	✓	✓	✓	✓
Federal Highway Administration (FHWA)	✓	*	*	*	*
Federal Motor Carrier Safety Administration (FMCSA)	*	*	*	*	*
Federal Railroad Administration (FRA)	*	*	*	*	*
Federal Transit Administration (FTA)	*	*	*	*	*
Maritime Administration (MARAD)		✓	✓	✓	✓
Treasury, Department of (TREAS)	✓	✓		✓	✓
Bureau of Engraving and Printing (BEP)	✓	✓			
U.S. Postal Service (USPS)	✓	✓	✓	■	✓
Veterans Affairs, Department of (VA)	✓	✓	✓	■	✓

✓ Report filed by deadline September 30

■ Agency submitted draft or final progress report at time of production of the Report to the President.

\* Agency notified the ACHP that the provisions of Section 3 of EO 13287 did not apply to them because they did not own real property.

▲ Agency notified the ACHP that they will no longer file individual agency progress reports, but their information will be included in their parent department/agency progress report.

## APPENDIX D: ADVISORY GUIDELINES IMPLEMENTING SECTION 3: REPORTING PROGRESS ON THE IDENTIFICATION, PROTECTION, AND USE OF FEDERAL HISTORIC PROPERTIES

Mandates on the management of federal real property continue to evolve and will continue to do so in the coming years as the federal government looks to reduce its size and carbon footprint. In response to these changes and trends, the ACHP issued revised guidelines in May 2014 to assist federal agencies in developing their progress reports. Specifically, the revised advisory guidelines augmented previous guidance by asking agencies to provide information regarding compliance with EO 13514, which has direct effects on historic properties within the federal real property inventory. It also requested additional information on agency preservation programs, with specific reference to their strategies for complying with Section 106 of NHPA. As in previous reporting, the use of these guidelines was not mandatory. A federal agency with real property management responsibilities could, at its discretion, determine how it would report on the progress of its efforts to identify, protect, and use its historic properties.

EO 13287 is not the only federal requirement for agencies to report on the status of their historic preservation programs. It is, however, one of the only federal reporting requirements that require an agency to assess historic properties as a whole and not simply by individual property type. An agency's five-year strategic plan, as required by 5 U.S.C. § 306, the annual performance plan, as required by 31 U.S.C. § 1115 (as amended by the Government Performance and Results Act of 1993), the development of annual Asset Management Plans as required by EO 13327, and the Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Lands required by OMB are notable prior requirements. Newer requirements include the development of annual Strategic Sustainability Performance Plans as required by EO 13514. The ACHP acknowledged these multiple reporting requirements and provided guidance to agencies on how information developed for these other mandates could be used for reporting under Section 3.

The following questions were asked in the 2014 Advisory Guidelines:

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

3. How has your agency established goals for the identification and evaluation of historic properties including whether they have been met?
4. Describe any internal reporting requirements your agency may have for the identification and evaluation of historic properties, including collections (museum and archaeological).
5. Explain how your agency has employed the use of partnerships to assist in the identification and evaluation of historic properties.
6. Provide specific examples of major challenges, successes, and or opportunities your agency has experienced in identifying historic properties over the past three years.
7. Explain how your agency has protected historic properties.
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.
9. Describe your agency policies that promote and/or influence the protection of historic properties.
10. Explain how your agency has employed the use of partnerships to assist in the protection of historic properties.
11. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in protecting historic properties over the past three years.
12. Explain how your agency has used historic properties.
13. Explain the overall condition of the historic properties within your agency's control.
14. Describe your agency policies that promote and/or influence the use of its historic properties.
15. Explain how your agency has used Section 111 (16 U.S.C. § 470h-3) of NHPA in the protection of historic properties.
16. Explain how your agency has employed the use of partnerships to assist in the use of historic properties.
17. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in using historic properties over the past three years.
18. Describe your agency's sustainability goals and climate change adaptation planning and how stewardship of historic properties is being addressed.



## APPENDIX E: FEDERAL REAL PROPERTY REPORTING

Reporting Requirement	Purpose	Submitted to	Who should report	Due Date
<b>EO 13327: Federal Real Property Profile</b>	This report is intended to promote efficient and economical use of real property resources, increase agency accountability and management attention to real property reform, and establish clear real property goals and objectives.	GSA	Agencies listed in 901(b)(1) and (b)(2) title 31; DHS	Annually, on December 15
<b>EO 13327: Asset Management Plan</b>	Each agency will draft an asset management plan that addresses at a minimum, the Federal Real Property Council Guiding Principles and the required components	OMB	Agencies listed in 901(b)(1) and (b)(2) title 31; DHS	Annually, dependent upon the quarter OMB approved previous plan
<b>SFFAS 29 (Heritage Assets)</b>	Disclosure requirements applicable to the agency financial statements and the U.S. Government-wide Financial Statement for heritage assets and stewardship land information reclassified as basic information with the exception of condition reporting, which is considered required supplementary information	Congress/ OMB	All federal agencies required to prepare audited financial statements under the Chief Financial Officer; Government Management Reform, and Accountability of Tax Dollars Acts	Annually, 45 days after the end of the fiscal year
<b>The Report to Congress on the Federal Archaeology Program</b>	To report on federal archaeological activities in order to offer assistance with professional methods for archaeological preservation and for the administration of historic preservation programs	NPS	All federal agencies and departments that undertake, contract for, issue permits and licenses, or that require archaeological investigations of other parties	Annually, on May 1
<b>EO 13287: Section 3(c) Progress Reporting</b>	Prepare a report on an agency's progress in identifying, protecting, and using historic properties in its ownership and make the report available to the ACHP and the Secretary of the Interior	ACHP	All federal agencies with real property management responsibilities	Triennially, beginning September 2005
<b>EO 13514: Strategic Sustainability Performance Plan and Annual Updates</b>	Prepare a strategic sustainability performance plan to prioritize agency actions based on lifecycle return on investment	OMB/CEQ	All federal agencies defined in Section 105 of Title 5, United States Code, excluding the Government Accountability Office	Annually, beginning June 2010



*Preserving America's Heritage*

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