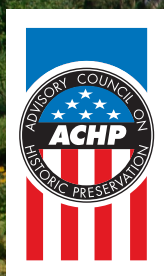




IN A SPIRIT *of* STEWARDSHIP



A REPORT ON FEDERAL HISTORIC
PROPERTY MANAGEMENT



2018



TABLE OF CONTENTS

I	ACHP CHAIRMAN'S MESSAGE
2	EXECUTIVE SUMMARY
5	CHAPTER 1: BACKGROUND AND INTRODUCTION
11	CHAPTER 2: IDENTIFYING HISTORIC PROPERTIES
25	CHAPTER 3: PROTECTING HISTORIC PROPERTIES
41	CHAPTER 4: USING HISTORIC PROPERTIES
55	CHAPTER 5: FINDINGS AND RECOMMENDATIONS
61	APPENDICES
	PRELIMINARY PATTERNS AND TRENDS IN ANALYSIS OF FEDERAL REAL PROPERTY PROFILE DATA
	LIST OF AGENCIES REPORTING
	LINKS TO AGENCY SUBMISSIONS AND ACKNOWLEDGEMENTS

Front Cover Photos

Top: NHL nuclear cargo ship *N.S. Savannah*, U.S. Department of Transportation, Maritime Administration, Canton Marine Terminal, Baltimore, MD (photo courtesy Gene Carl Feldman). **Center L-R:** Launchpad 39A with SpaceX Falcon rocket, Kennedy Space Center, FL (photo courtesy NASA). Old Post Office and Custom House, Key West, FL (Jjiawangkun Fotolia). Aerial view of Governors Island and Manhattan, NY (Richard Cavalleri Shutterstock). Naval Medical Center San Diego, CA (f8grapher Fotolia). **Bottom:** Dayton VA Medical Center Grotto and Gardens restoration, Dayton, OH (photo courtesy American Veterans Heritage Center)

This page: Apollo Mission Operations Control Room 1969, Houston, TX (photo courtesy NASA)

CHAIRMAN DONALDSON'S MESSAGE



February 15, 2018

The Advisory Council on Historic Preservation (ACHP) is pleased to present the fifth triennial report on how well federal agencies manage their historic properties, pursuant to Executive Order 13287 "Preserve America." Federal agencies were required to submit progress reports to the ACHP and the Secretary of the Interior in 2017 on the status of their efforts to identify, protect, and use their historic properties. As agencies continue to work smarter to provide critical infrastructure 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 resiliency, assist in the delivery of infrastructure, and promote economic development and job creation in local communities.

The Preserve America Executive Order requires agencies to actively advance the protection and productive use of historic properties owned by the federal government. Based on the federal agency progress reports and our daily business working with federal agencies all over the country, the ACHP has identified several preservation challenges and accompanying recommendations to advance the goals of the Executive Order and the National Historic Preservation Act.

The ACHP supports the broad goals of cost efficient, effective, sustainable, and resilient federal property management. We are also committed to building a more inclusive historic preservation program, and ensuring that all communities in our diverse nation have a stake in preserving historic properties of importance and significance to them. We encourage federal leadership and interest in the stewardship of historic properties in federal ownership and appreciate the attention given to this important report.

Milford Wayne Donaldson, FAIA
Chairman
Advisory Council on Historic Preservation



An independent federal agency, the 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. The ACHP promotes historic preservation to foster the understanding of the nation's heritage and the contribution that historic preservation can make to contemporary communities and their economic and social well-being.



EXECUTIVE SUMMARY

Traces of the famous Oregon Trail carved in the land heading west, Wyoming (iStockphoto)

This report to the President is required every three years under Executive Order (EO) No. 13287, “Preserve America.” The report focuses on the state of the federal government’s efforts to identify, protect, and utilize their historic properties and their contribution to local economic development between 2014 and 2017. EO 13287 reinforces the role of federal agencies as stewards of their historic properties and underscores the importance of federal agency efforts to inventory, protect, and use these properties. Federal historic properties play a diverse range of roles, from providing infrastructure critical for agency missions, to housing members of the military and federal offices, as sacred places important to Native Americans and Native Hawai’ians, to sharing stories of American history with visitors.

Information in this report is derived primarily from the 23 federal agency progress reports submitted to the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior. Agency reports focused on progress made in identifying, protecting, and using historic properties in federal ownership since the last report in 2015. Federal agencies continue to provide creative examples of historic properties adaptively reused and rehabilitated to be energy efficient and resilient, as well as historic properties leased or disposed to parties responsible for their preservation. Collectively, these reports also demonstrated that there remains wide-spread support among the public for the protection and use of historic properties, and that federal efforts to do so strengthen communities and contribute to a stronger economy through the creation of jobs.

In addition to the review of the agency progress reports, the findings and recommendations presented in Chapter 5 of this report also are informed by the ACHP’s extensive, and

nationwide, interaction with federal agencies and preservation partners on various undertakings, programs, and initiatives over the last three years. The preservation findings and conclusions identified over the current reporting cycle include the following:

FINDING: *Agencies that have already used Section 106 program alternatives were able to improve the efficiency and cost effectiveness of project reviews.*

FINDING: *Efforts to identify historic properties and ensure that consistent information about historic property inventory efforts are made available electronically can better inform and improve real property management and federal and non-federal planning.*

FINDING: *Partnerships can leverage limited federal resources and provide important benefits to federal agencies in the identification, protection, and use of historic properties.*

FINDING: *Agencies would benefit from more effective mechanisms to ensure timely involvement of Indian tribes and Native Hawai’ian organizations in property management activities and infrastructure planning.*

FINDING: *Further development of policies and procedures to assist federal agencies in considering historic properties as part of their efforts to comply with “Reduce the Footprint” requirements would improve preservation outcomes without delaying compliance with these requirements.*

FINDING: *Fostering and encouraging the reuse of historic facilities by federal agencies or others creates cost-effective preservation outcomes.*

Recommendations to address these findings are presented in Chapter 5.

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 and are given appropriate consideration when planning for federal real property management strategies and initiatives that address infrastructure renewal, energy efficiency, resiliency, and long-term preservation.

Acting YAP SHPO Francis Reg explains the restoration of a men’s house on Yap, a project partially sponsored by NPS.





The "Four Corners of Law" Charleston, SC, Meeting and Broad streets, including U.S. Post Office and Courthouse (photo courtesy Lauren Northup)



CHAPTER

BACKGROUND AND INTRODUCTION

Fort Hancock Homes, Gateway National Recreation Area, New Jersey (Andrew Kazmierski Fotolia)

This is the fifth triennial report on the status of federal property-owning agencies' progress in identifying, protecting, and using their historic properties. These progress reports are required under Section 3 of EO 13287, "Preserve America," signed by President George W. Bush in 2003. The ACHP and the Secretary of the Interior review and analyze the information submitted and present their findings to the President by February 15, 2018.

The ACHP is an independent federal agency that 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 ACHP also oversees implementation of Section 3 of the EO. The full text of the "Preserve America" EO can be found here: <http://www.preserveamerica.gov/Executive%20Order%2013287.pdf>. The membership of the ACHP can be found here: <http://www.achp.gov/members.html>.

The federal government is the steward of thousands of historic properties of all kinds across the country and in all its territories—these include buildings, structures, traditional landscapes of religious and cultural significance to Indian tribes and Native Hawai'ian organizations (NHOs), archaeological sites and districts, scientific and highly technical properties and objects, and others. This EO focuses on reinforcing the preservation stewardship responsibilities of federal agencies, which began with the Antiquities Act of 1906, was expanded in the Historic Sites Act of 1935, was reinforced in 1966 in the National Historic Preservation Act (NHPA), specifically in Sections 1, 2, and 110, and by subsequent amendments to the NHPA.

The goal of these statutes and this EO is to ensure that federal agencies are good stewards of historic properties for the benefit of the American people, while still meeting mission needs. Section 110 of the NHPA (54 USC 3061) sets forth the broad affirmative federal agency responsibilities with respect to their programs for balancing mission needs with historic values. The intent of Section 110 is to ensure historic preservation is fully integrated into the programs of federal agencies. To assist agencies in achieving the purposes of Section 110, the ACHP and the National Park Service (NPS) have jointly issued guidance entitled *The Section 110 Guidelines: Annotated Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act* (available here: <https://www.nps.gov/fpi/Section110.html>).

Many agencies meet these responsibilities through compliance with Section 106 of the NHPA (54 USC 306108) for their undertakings. Section 106 of the NHPA requires federal agencies to “take into account” the effects of their projects and programs on historic properties and provide the ACHP a “reasonable opportunity” to comment on them. The ACHP’s regulations implementing Section 106 (36 CFR Part 800, <http://www.achp.gov/regs-rev04.pdf>) set forth this review process, whereby the federal agency consults with the State Historic Preservation Officers (SHPOs), and oftentimes with Indian tribes or NHOs, to determine if the proposed project will have an effect on a property listed on or eligible for listing on the National Register of Historic Places (NRHP), and if so, what measures might be appropriate to avoid, minimize, or mitigate adverse effects.

Agency Section 3 reports are intended to analyze their progress in meeting the goals of the EO since the last report three years ago. A universal sentiment running through all the submitted reports is that federal agencies are proud of their stewardship of historic properties; they want to tell their story and how they contribute to economic development and resource independence. The many examples federal agencies provided in their reports run the gamut of historic property type, threats to them, and preservation opportunities grasped. How these agencies responded with their own historic preservation initiatives, partnerships, and creative solutions to better protect these resources, while providing the American public more and better chances to enjoy and appreciate them, deserves to be told in their own words.

While this report addresses the requirements of Section 3 of the EO, other sections of the EO also spell out federal agency oversight responsibilities. Section 1 reaffirms the historic preservation principles set out in Sections 1 and 2 of the NHPA—that federal agencies should exhibit leadership in the field of historic preservation and should use their historic properties where practicable. Section 2 of the EO calls for federal agencies to build preservation partnerships where possible and “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.” Section 3 (among other things) requires federal agencies “with real property management responsibilities” to assess the status and state of their historic preservation stewardship, first in an initial report to the ACHP and the Secretary of the Interior by September 30, 2004, and then every three years afterwards.

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 practicable, contribute to local communities and their economies. Section 5 states that federal agencies are to use their historic properties in concert with state, tribal, and local tourism programs to foster heritage tourism opportunities. How federal agencies carry out their duties under Sections 2, 4, and 5 of the Preserve America EO are touched on and discussed to some extent in this report.

Throughout this report the term “historic properties” is used as defined in the NHPA as those buildings, structures, objects, sites, and districts that are listed in, or are eligible for listing in, the NRHP. The term includes National Historic Landmarks (NHLs) which are designated as such by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the nation.

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 as required by the Preserve America EO. The chart in Appendix 2 illustrates the history of agency Section 3 reporting.

Agencies were encouraged to utilize existing reporting systems to prepare this report. The ACHP posts the progress reports received from agencies on the web at <http://www.achp.gov/section3/>. Agencies may elect not to submit progress reports for a variety of reasons, including because the provisions in EO 13287 do not apply to them as they do not own real property. Further, 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 of Federal Historic Properties* (<http://www.achp.gov/docs/advisory-guidelines-2017.pdf>), some agencies used the questions in the advisory guidelines, while others did not. As a result of these variables, it is difficult to present a comprehensive picture of federal agency stewardship across the board. However, trends can be discerned in the information provided, and these are presented in Chapter 5, “Findings and Recommendations.”



PRESERVATION INITIATIVES 2014-2017

The current reporting period spans two Administrations, and in the first year of the current Administration several laws, EOs, and policies have been and are being promulgated that are already having an impact on how the federal government utilizes its historic properties and how it will carry out its stewardship responsibilities. The extent to which real property management practices and others (budget, shrinking government, etc.) have changed or stayed the same are discussed throughout this document.

» **Permitting, streamlining, and infrastructure.** During the reporting period, the federal government focused legislative and policy attention on the improvement of the federal permitting process for infrastructure projects affecting historic properties on federal lands. The Fixing America's Surface Transportation Act (FAST) Act was passed in December 2015. Title 41 of the FAST Act created the Federal Permitting Improvement Steering Council (Permitting Council), of which the ACHP is a member. The Permitting Council plays a key role in implementing specific provisions in Title 41 of the FAST Act. The FAST-41 process was designed to improve the timeliness, predictability, and transparency of the federal environmental review and authorization process for certain large-scale infrastructure projects, some of which may be located in part on federal land. FAST-41 provides for improving the federal coordination of environmental reviews, including Section 106 reviews, but does not alter an agency's responsibility to comply with Section 106 or change the requirements or timeframes in the ACHP's regulations or an existing Section 106 Programmatic Agreement.

Federal agencies develop permitting timetables for projects following the FAST-41 process. Milestones for environmental review and other information about covered projects are publicly tracked on the Federal Permitting Dashboard. FAST-41 also requires the Permitting Council to develop best practices that can be applied broadly to federal environmental reviews and authorizations to all infrastructure projects.

On August 15, 2017, the President issued EO 13807, "Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure," with the goal of increasing the coordination, predictability, and transparency of the federal environmental review and permitting process for infrastructure projects. This EO strengthens the accountability of federal agencies in carrying out environmental review for major infrastructure projects and includes important new milestones—namely, for agencies to coordinate their reviews and complete them within an average of two years.

The ACHP participated in an interagency consultation process led by the Departments of the Army, Interior, and Justice in late 2016 to identify opportunities for more effectively consulting Indian tribes on infrastructure projects affecting historic properties on federal lands and prepared a report with recommendations specific to the Section 106 process in response to comments offered by Indian tribes [<http://www.achp.gov/docs/achp-infrastructure-report.pdf>]. The ACHP's report is a companion publication to an interagency report on *Improving Tribal Consultation and Tribal Involvement in Federal Infrastructure Decisions* released in January 2017 in response to the listening sessions. [<https://www.bia.gov/sites/bia.gov/files/assets/as-ia/pdf/idc2-060030.pdf>]

These developments are part of an ongoing emphasis within the federal government on improving efficiency and increasing interagency coordination for infrastructure project reviews. Federal land-managing agencies have been actively involved in these efforts as they consider the siting of pipelines, electric transmission lines, oil and gas drilling, communication facilities, and other types of infrastructure on their property.

» **Building a More Inclusive Preservation Program.** The ACHP has undertaken an initiative to engage diverse audiences in conversations about historic preservation to ensure the national preservation program recognizes the heritage of all Americans and provides access to tools and activities for all who care about that heritage. In a series of conferences, listening sessions, and meetings with diverse constituencies, including listening sessions in Boston, San Francisco, Santa Fe, and Tampa to hear directly from Asian American and Pacific Islander, Latino, and African American communities, a consistent set of themes rose to the surface during these conversations. Those include the following:

- Preserve cultural values, including the intangible aspects of historic places;
- Recognize all Americans' history and protect the special cultural identity of places, communities, and landscapes;
- Make heritage relevant for youth;
- Develop community and organizational capacity, including partnerships;
- Integrate cultural values and be aware of community needs when implementing standard historic preservation processes and projects;
- Weave culture and public engagement more sensitively into planning and resource management by increasing consultation efforts and opportunities.

At the summer 2016 business meeting, ACHP members voted unanimously to adopt final recommendations that will institutionalize the goals of a multi-year initiative to build a more inclusive national preservation program. The concepts and ideas which developed into these recommendations began to surface years ago through the work of historic preservation organizations such as the ACHP, NPS, and the National Trust for Historic Preservation, as well as programs such as Preserve America.

» **The National Historic Preservation Program at 50: Priorities and Recommendations for the Future.** As part of its commemoration of the 50th anniversary of the NHPA in 2016, in consultation with its members (including federal agencies) and with input from a variety of other public and private parties, the ACHP developed a report and recommendations to assess and improve the National Historic Preservation Program. Included for consideration were some of the key tools currently used under the NHPA and related authorities, such as the Historic Preservation Fund, the NRHP, Section 106 review, and the Federal Historic Preservation Tax Credits.

The final report, *The National Historic Preservation Program at 50: Priorities and Recommendations for the Future*, was approved by the ACHP on December 1, 2016, and released to the public in both print and online versions in March 2017 (<http://www.achp.gov/docs/Preservation50FinalReport.pdf>). A number of the recommendations overlap with or complement actions and initiatives already being undertaken by the ACHP and other parties, including the *Building a More Inclusive Preservation Program* noted above:

- Maintaining and strengthening public support for preservation;
- Enhancing leadership at the policy and program levels of the federal government;
- Improving preservation planning, including better integration of preservation concerns with other environmental and planning review processes;
- Strengthening sustainable funding and investment in preservation, both public and private;

- Expanding and encouraging public engagement in deciding what is important and how significant resources should be managed;
- Advancing equity and inclusion in what is preserved;
- Responding to indigenous peoples' concerns about the preservation of their heritage;
- Enhancing further appreciation for heritage through formal and informal education;
- Promoting more effective collaboration and partnerships that advance preservation goals; and
- Addressing the preservation consequences of climate change, disaster planning and recovery, and environmental sustainability.

While the report is intended to offer a blueprint for the future, many of these recommendations are already being adopted and implemented by the federal agencies discussed in this Section 3 report. Strategies to implement many recommendations are presented in Chapter 5 of this report.

INTRODUCTION TO THE 2018 REPORT

A total of 23 departments or agencies reported on their efforts to identify, protect, and use their historic properties between the years 2014 to 2017, the current reporting cycle. A list of all responding agencies and their history of Section 3 reporting can be found in Appendix 2. This 2018 report differs from previous Section 3 reports in several ways. First, this report was designed from the start to be web-based, with links to other documents and preservation resources mentioned in the text. Second, this report focuses specifically on those federal agency responsibilities as set out in Section 3 of the EO: to identify, protect, and use historic properties. Finally, this report contains more examples and case studies of successful federal agency stewardship than previous reports, all to better illustrate the breadth of historic properties owned by the federal government, the myriad ways they care for them, and how they can contribute to the goals of economic development and resource independence.



CHAPTER

2

IDENTIFYING HISTORIC PROPERTIES 2014-2017

Tennessee Valley Authority and tribal archaeologists conducting research at Hiwassee Island archaeological site, on the Tennessee River in east Tennessee (photo courtesy TVA)

For this report, federal agencies were asked to share with the ACHP and Secretary of the Interior information about their efforts to identify historic properties for the period from 2014 through 2017, including progress since the last report, how their identification methods have changed, and how they manage and use their databases.

OVERVIEW:

The ACHP believes an accurate, up-to-date inventory of an agency's historic properties, and the steps taken to increase and refine it, is a requisite for determining management priorities for those properties. Only with an understanding of their historic properties—the historical, economic, and educational values they embody and the agency resources needed and realistically available to care for them—can agencies begin to develop management priorities for their future.

Federal agency progress on identifying historic properties:

Between 2014 and 2017 most responding federal agencies continued to make progress in identifying historic properties under their ownership. Some smaller agencies reported no change in their inventory of historic properties under their ownership, while other small agencies carried out surveys that identified new historic properties. As one would expect, the nature of the agency (e.g., primarily land-managing agencies or building-managing agencies, large agencies or small) influenced the kinds of historic properties identified, and the intensity of that identification effort.

Highlights:

- » Department of Homeland Security (DHS) reports that 10 percent of its facilities have now been evaluated for historical significance, an increase of 4 percent since the last report.
- » US Postal Service (USPS) reports that 14 percent of all owned properties were evaluated for NRHP eligibility over the past three years, and now counts 35 percent of its owned properties (3,070 out of a total of 8,761) as historic.
- » US Geological Survey (USGS) reports completing NRHP eligibility evaluations on 18 percent of all its properties.
- » Department of Veterans Affairs (VA) listed 20 cemetery properties on the NRHP under the Inter-World War National Cemeteries, 1934-1939, Multiple Property Submission.
- » Tennessee Valley Authority (TVA) surveyed 4,075 acres of its land during this period, and now has evaluated the NRHP eligibility of 11,500 archaeological sites and 380 buildings and structures on its 293,000 acres of non-inundated land.
- » Bureau of Land Management (BLM) surveyed 1,539,992 of its 245 million acres of public lands, reports that it recorded 23,256 sites, with 7,557 determined eligible for the NRHP, and found 10,953 to be not eligible. Through FY 2016, BLM cumulatively has surveyed more than 25 million acres (approximately 10 percent of BLM surface lands) for historic properties, with an average of 513,000 acres surveyed annually from FY 2014 through FY 2016.
- » In the 2014 Preserve America progress report, the NPS was responsible for the stewardship of 401 park units containing more than 84 million acres within their boundaries. Today, the national park system includes 417 units in all 50 states, the District of Columbia, and surrounding territories.
- » Department of Defense (DoD) surveyed approximately 184,000 acres for archaeological resources, increasing the total land surveyed to more than 9 million acres. DoD also evaluated more than 7,000 buildings and structures for NRHP eligibility.
- » The US Army Corps of Engineers (USACE) reports at least 396 newly recorded historic properties by 12 USACE District offices.
- » Under a multiyear compliance initiative nearing completion, the General Services Administration (GSA) has evaluated all but a few of its buildings that are more than 50 years old. During the 2015-2017 reporting period, GSA evaluated 62 properties and nominated 39 eligible properties to the NRHP. Eighty-one percent of their eligible historic properties have been listed in the NRHP. GSA's national leadership role in listing its historic properties has been lauded by the Department of the Interior (DOI). Evaluation of the remaining few properties included in this initiative is underway, while newly evaluated historic properties will continue along the path to listing.

NPS archaeologists care for more than 80,000 archaeological sites that have been identified in national parks. At the end of FY 2017, 80,911 known archaeological sites were located within national parks. Inventory and evaluation of sites is ongoing.

In 2015, TVA evaluated the NRHP eligibility of TVA's hydroelectric system. TVA's dams and associated structures were found to be historically significant at the national, state, and local levels due to their association with broad patterns of history and engineering and architectural importance. The Keeper of the NRHP accepted TVA's Multiple Property Documentation Form, along with the individual nominations of its Norris, Wheeler, and Guntersville Hydroelectric facilities. Twenty-two additional facilities were listed in the NRHP in 2017, so that today, all of the major hydro facilities that TVA constructed are now recognized by the NRHP.

Federal agency policies and procedures to identify historic properties:

Federal agencies have a variety of policies and procedures to identify their historic properties. These are derived from statutes both specific (e.g., Sections 1, 106, and 110 of the NHPA; Archeological Resources Protection Act) and general (Federal Lands Policy Management Act, National Environmental Policy Act [NEPA], etc.), from Executive Orders (e.g., President Bush's EO 13327, *Federal Real Property Asset Management*, 2004) to internal department and agency policy and requirements that implement these statutes and EOs.

Most land-managing agencies who reported this cycle describe their internal agency management guidance as their "prime directive." In some cases, this guidance is based on a Programmatic Agreement that is often national in scope—the BLM and NPS Nationwide Agreements, for example. Agency practices provide a framework for carrying out historic property identification and stewardship in the context of multi-use missions—often encompassing recreation, resource sustainability, economic development, and energy development. Procedures for reviewing project plans for their possible effects on historic properties are laid out within these policies and procedures (as well as procedures for compliance with other preservation laws, like the Archeological Resources Protection Act [ARPA] and the Native American Graves Protection and Repatriation Act [NAGPRA]).

Federal agencies that primarily manage buildings and structures also have internal preservation directives. DHS's Directive 017-01, *Historic Preservation in Asset Management and Operations and Accompanying Instruction Guide to the Historic Preservation in Asset Management Operations*, applies to all its component agencies, while these agencies: FEMA, US Customs and Border Protection (CBP), US Coast Guard (USCG) also have their individual policies tailored to their specific missions and historic resources. It should also be noted that the Federal Bureau of Prisons (BOP) recently issued historic guidelines in its Facilities Operational manual in July 2017. DoD does not have any specific preservation directives; the only cultural resources directive is general DoD instruction 4715.16 "Cultural Resources Management" (issued 2008).

The National Soldiers Home "Old Main"
at the Clement J. Zablocki VA Medical Center,
Milwaukee, WI (photo courtesy National Trust
for Historic Preservation/Matthew Gilson)



In carrying out their agencies' often multiple missions—energy development and distribution, national defense, economic development, and recreation, to name a few—responders say when implemented as intended, their internal historic preservation policies and the attendant procedures to implement them are effective in ensuring project reviews are completed in a timely manner avoiding delays, and ensuring historic preservation is substantively considered.

However, one sticking point is that, based on ACHP experience and Section 3 reporting, some federal agencies' policies and procedures for identification are only starting to keep up with current property conceptions and thinking in historic preservation, especially in terms of early consultation with Indian tribes and NHOs, identifying and addressing effects to traditional cultural places (TCPs) and cultural landscapes, and in consideration of modernist buildings as potentially significant and worthy of consideration. The larger agencies like BLM, TVA, and GSA are on the forefront of these changing mores and practices.

Budgeting for historic property identification:

While some agencies (e.g., GSA, National Aeronautics and Space Administration [NASA], TVA) reported that they budget expressly for Section 110 surveys, the ACHP continues to see the vast majority of federal historic property identification occurring within the context of the Section 106 process. This is reactive and not proactive, and can lead to unnecessary delays in project review and in allocating scarce resources for property stewardship. While many federal agencies recognize this, and are trying to refocus efforts to support Section 110 surveys

The "Section 110" requirement for survey of historic properties on federal property is in the NHPA: *Each Federal agency shall establish a preservation program. The program shall ensure that historic property under the jurisdiction or control of the agency is identified, evaluated, and nominated to the NRHP.* 54 U.S.C. § 306102(a) - (b)(1).

USACE Mobile District developed a new tool "RECENTPAST" to assist with management and protection of sites on USACE project lands. This tool consists of digital maps showing culturally sensitive areas overlaid with areas where the District is planning water and land management activities.

The Department of the Air Force implemented standardized and electronic Integrated Cultural Resources Management Plan (ICRMP) templates in 2015 and requires all existing and newly developed ICRMPs to utilize the template. This standardization of ICRMPs allows quick review by base, installation support teams, and the Air Force Civil Engineer Center which (1) reduces data call time and energy, (2) allows in-house updates, (3) allows intra-service sharing of lessons learned; and (4) creates a more uniform set of standard operating procedures.

in part to keep ahead of plans for the reduction of the federal real property inventory and reinvestment in existing infrastructure, in every reporting cycle since 2004 a lack of available resources is the primary challenge to increasing capacity to identify the historic properties they own. The number of agencies citing this as the reason for doing inventory has not improved over the past three years.

TVA has a general policy to survey 1,000 acres each year for historic properties. Other agencies allocating for Section 110 inventories gave several reasons for doing so. GSA said,

To remain a step ahead of plans for reinvesting in buildings potentially eligible for the NRHP, GSA's regional preservation programs budget for Section 110 determinations of eligibility and building preservation plans as part of each region's yearly due diligence.

Operations of the National Park Service (CR-ONPS) funding source supports research, documentation, stabilization, and conservation of NPS cultural resources, and directly supports the goals of resource stewardship, relevance, and education. These funds support park planning needs relating to proposed development and allow parks to inventory and evaluate cultural resources per the requirements of Section 110 of the NHPA. They also provide for baseline research and treatment guidance that is critical to support the streamlined compliance process for deferred maintenance and infrastructure projects that impact park resources.

NASA reports that while it has made, “a general shift from reactive, Section 106-driven identification to proactive, comprehensive Section 110 identification of historic properties” and now has “comprehensive, gate-to-gate surveys of resources over 45 years of age” at several of its Centers, it also remarked that

... the current climate of federal budgetary restrictions and the move toward commercialization of space exploration means that NASA has less discretionary funding to redirect from mission-critical programs. This can result in the deferral of Section 110 identification and reliance on Section 106 identification, since the latter is required to carry out the physical improvements necessary to advance a project, which is directly attributable to the mission.

As an example, the BOP reports that due to funding restrictions, no identification studies under Section 106 have taken place in the last three years, and it has no funding to address its facilities that are 50 years of age or older. Even agencies with substantial federal historic preservation programs have seen, at best, a flat Cultural Resource Management (CRM) funding and a consequent reduction in (or inability to fill) dedicated full-time employees (FTEs) in recent years. BLM reported that it has approximately 18 CRM vacancies, critical to an agency that manages so much land. While not providing dollar figures, the Fish and Wildlife Service (FWS) noted it was able to bring on three additional CRM positions in FY 2016, but also cautioned that it needed an additional 16 FTEs to meet current requirements. A lack of staff was the major reason FWS cited for the 169 Section 106 undertakings that were not completed in FY 2016, with the proposed activities put on hold.

BLM reports Section 110 activities occur when funding is available and staff can devote their time to those investigations, and is typically focused on high use/high impact areas.

Historic property information management—the FRPP and other systems:

Over the past three years federal agencies have improved their individual databases and reporting standards to better account for their historic properties. This has been achieved in conjunction with the efforts of the Federal Real Property Profile (FRPP) that was created in part to assist agencies in better identifying and managing their real property holdings.

The FRPP is managed by the Federal Real Property Council (FRPC), and houses information about the nature, use, and extent of the federal government’s real property assets. It contains data on all executive branch agency real property assets within and outside the United States, including improvements on federal land, except when otherwise required for reasons of national security, in accordance with EO 13327 (*Federal Real Property Management*, 2004). A preliminary analysis of patterns and trends in FRPP data on historic properties is presented in Appendix 1.

Some agencies also continue to use separate asset management systems because their needs go beyond what the FRPP is designed primarily to document: above-ground real property, so that information on archaeological sites, TCPs, and historic districts is either lacking or incomplete. The Government Accountability Office’s (GAO) report (*Federal Real Property: Improved Data Needed to Strategically Manage Historic Buildings*, 2012) recommended that GSA collaborate with FRPC member agencies and others to address the need for improved data on historic buildings in the FRPP. In 2013, the ACHP created a work group to address these concerns. Comprising representatives of GSA, DoD, DHS, VA, DOI (including NPS and BLM), the National Conference of State Historic Preservation Officers (NCSHPO), 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 (and subsequent editions) of the Data Dictionary.

For the most part, though, and aside from formal listing on the NRHP, historic properties information continues to be included in inventories maintained by individual federal agencies, and also by state, tribal, and local governments. This causes problems for a comprehensive, searchable, and accessible inventory of the nation’s historic properties which could provide a strong planning tool, especially in the case of disasters, emergencies, and expanding and updating infrastructure.

Linking existing lists of historic properties and expanding them into a comprehensive inventory would require encouraging and supporting use of standards addressing common data formats and management tools, including digitization and GIS interface across federal agency, state, and tribal lines. For the past 10 years, the ACHP has continued to explore the development of such a comprehensive digital inventory of federal historic properties for federal, state, tribal agencies, and industry to assist in meeting the requirements of Sections 106 and 110. The ability to characterize historic properties within a particular area could greatly speed up the siting of new infrastructure and resource extraction that affect historic properties on federal lands. Such an inventory was one recommendation made in the 2007 Preserve America report and in the ACHP’s *The National Historic Preservation Program at 50: Priorities and Recommendations for the Future*. Such an inventory would include the “information necessary for management, planning, and decision making ... government agencies, Indian tribes, businesses, and citizens need usable information as the basis for decisions on protection, funding, revitalizing, and interpreting historic properties.”

The importance of partnerships to identify historic properties:

While many federal agencies reported on their use of partnerships for resource protection and use, some also entered into agreements for inventory and survey purposes. The common thread in agency responses is the relationship between the federal agency and the SHPOs and, especially for land managing agencies, with Tribal Historic Preservation Officers (THPOs) and federally recognized Indian tribes. Most agencies reporting also noted that they partnered with other federal agencies as the need arises, usually because they also owned or managed adjacent resources or had specific kinds of expertise.

Highlights:

- » Bureau of Reclamation's (Reclamation) Grand Coulee Power Office partnered with the Bonneville Power Administration, NPS's Lake Roosevelt National Recreation Area, USACE, the Washington and Montana SHPOs, the Confederated Salish and Kootenai Tribes, the Spokane Tribe of Indians, and the Confederated Tribes of the Colville Reservation to survey 36,977 acres of federal lands for the Federal Columbia River Power System Cultural Resources Management program.
- » US International Boundary and Water Commission (USIBWC) manages site forms and reports on several state databases (e.g., the South Coastal Information Center at San Diego State University, databases for the Arizona and New Mexico SHPOs, and the Texas Archeological Research Laboratory in Austin).
- » DHS notes that a 2017 SHPO survey found that FEMA was ranked No. 2 of all federal agencies in maintaining good working relationships with them.

Given that the FRPP is currently not equipped to manage information on archaeological properties, the data collected for the NPS' *Federal Archeology Program's Secretary's Report to Congress* would seem to have real potential as a tool to track and assess federal archaeology activities. This report is the only one that specifically collected data on the full range of federal agencies' archaeological stewardship activities—site identification, protection, excavation, reporting, and curation—in a comparable format.

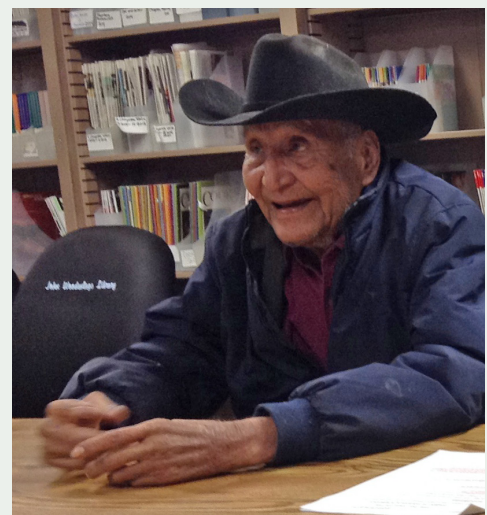
Properties located but not evaluated:

The ACHP continues to see the trend of cultural resources being located and identified but not evaluated to determine their NRHP significance. This approach often has unforeseen consequences for efficient property management. A major consequence is that these unevaluated properties become what has been termed "persistent resources" that stay on the agency's books as a form of constant background noise, creating management inefficiencies until decisions are finally made about their significance. Agencies may unnecessarily spend time and scarce money to avoid such properties in their management of them or in future Section 106 reviews.

CASE STUDY

BUREAU OF LAND MANAGEMENT ETHNOGRAPHIC ASSESSMENT PARTNERSHIP

Montana BLM continues its partnership with Chief Dull Knife College and the Northern Cheyenne Tribe on an Ecoregional Ethnographic Assessment, which focuses on identifying, documenting, evaluating, and mapping places of traditional religious or cultural significance to the tribe, and identifying culturally important plant and animal species and their associated ecosystems that are critical for the maintenance of Northern Cheyenne cultures and traditions. The tribe benefits by capturing this legacy data for present and future generations. BLM benefits by gaining a better understanding of the tribe's significant resources and by being able to make more informed land management decisions. BLM plans to begin work with the Crow and Yankton Sioux Tribes on similar projects.



Oral history interviews conducted with members of the Northern Cheyenne Tribe (Photographs courtesy of Chief Dull Knife College, provided by BLM)

In 2015, TVA partnered with three tribes—Muskogee Creek Nation of Oklahoma, Chickasaw Nation, and United Keetoowah Band of Cherokee Indians—to conduct non-invasive geophysical field training and archaeological feature identification at Hiwassee Island in the Tennessee River. The 2015 results were successful enough that TVA initiated another partnership project with the tribes in FY17 to conduct limited ground testing of the features identified earlier. TVA also provided training opportunities for non-archaeologist tribal representatives as part of the excavations.



Investigating the USS *Monitor* wreck, Monitor National Marine Sanctuary, Atlantic Ocean (photo courtesy NOAA)

CASE STUDY

CIVIL RIGHTS NATIONAL HISTORIC LANDMARK COURTHOUSES

Three courthouses were designated by the Secretary of the Interior as NHLs within the context of the Theme Study on Civil Rights in America: Racial Voting Rights. These previously NRHP-listed courthouses were designated as NHLs in thematic nominations associated with the Civil Rights Movement and desegregation in public education: the Frank M. Johnson Jr. Federal Building and U.S. Courthouse (originally the United States Post Office and Courthouse) in Montgomery, Alabama; the Elbert P. Tuttle U.S. Court of Appeals Building (originally the U.S. Post Office and Courthouse), in Atlanta, Georgia; and the John Minor Wisdom U.S. Court of Appeals Building (originally the Fifth Circuit U.S. Court of Appeals), in New Orleans, Louisiana.

In the 1950s and 1960s, the Fifth Circuit Court of Appeals, which had jurisdiction in six southeastern states, shaped the Civil Rights Movement with momentous rulings in the wake of nation-changing events, including the 1955 Montgomery Bus Boycott, 1961 Freedom Rides, the 1965 march from Selma to Montgomery, and desegregation of southern schools and universities following the Supreme Court's *Brown v. Board of Education* decisions in 1954 and 1955. These rulings served as the basis for pioneering legislative and judicial reform that followed. The three NHL-designated courthouses, as well as GSA's NRHP-listed former Montgomery Greyhound Bus Station (acquired as part of the courthouse site), are also among several properties—including GSA's Lewis F. Powell Jr. U.S. Courthouse in Richmond, Virginia, under consideration for inclusion in a World Heritage Site Serial Designation.

The Frank M. Johnson Jr. Federal Building and U.S. Courthouse, Montgomery, AL (photo courtesy Carol M. Highsmith Photography, Inc./GSA)



CASE STUDY

BUREAU OF LAND MANAGEMENT PERMIAN BASIN PROGRAMMATIC AGREEMENT SUCCESS CONTINUES

The Mescalero Plain is a band of wind deposited sand and dunes in southeastern New Mexico, with evidence of Paleoindian use since at least 5,000 BC. The plain sits atop the Permian Basin, the largest oil and gas basin in North America. The first oil well in the Permian Basin in New Mexico was drilled in 1924. By 2003, more than 300,000 acres managed by the BLM field office had been surveyed for oil and gas projects, and more than 8,000 archaeological sites had been recorded.

In New Mexico, most of the oil and gas development in the Permian Basin occurs on 2 million acres managed by the BLM Pecos District. The district processes thousands of oil-and-gas applications to drill annually, making it one of the busiest offices in the nation. For 30 years, BLM's archaeological program was driven by industry's needs—in the face of a proposed wellsite, the preferred action was “flag and avoid” (survey and record sites, and redesign projects to avoid the historic properties). As long as the spacing between developments allowed archaeologists to help industry move project footprints to avoid archaeological resources, preservation in place was a viable option. However, over time, intense development in some areas made it difficult to locate projects without harming archaeological sites. Many sites were being lost due to infrastructure maintenance, dune formation, and were ravaged by illegal artifact collecting. An alternative to “flag and avoid” was needed.

BLM and the New Mexico SHPO collaborated with archaeologists, tribes, and industry on a different approach to balancing energy development and archaeology. The fruits of their efforts were embodied in a Section 106 agreement that encompasses 1,700 square miles with the most active oil and gas areas. Operating under the agreement is voluntary—if a company chooses the agreement procedures, it contributes the cost of the archaeological survey into a mitigation pool. Under the terms of the agreement, the partners in the program collaborate to determine how the pool's funds are used, providing effective support for research and interpretation of the area's archaeology.

Since 2008, the oil industry has paid nearly \$11 million into the pool. Without the Permian Basin agreement, those funds would have been spent on thousands of small surveys. Instead, the funding pool has built a comprehensive field program, providing millions of dollars for archaeological research and studies that provide a foundation for understanding and managing the area's archaeological resources. Now all resources are managed through a GIS integrated with the New Mexico Cultural Resource Information System, replacing outdated records in an easy-to-access format. The system provides real-time pictures of surveyed areas and sites, indicating where work is needed. The pool supports educational materials and outreach events to engage locals with their heritage. Use of the agreement procedures gives industry more predictability and control over schedules and budgets needed to operate efficiently and demonstrates that the cultural resources projects they fund have real-world benefits.

The original agreement was so successful that signatories have extended the program's life through a Programmatic Agreement for 10 more years. Innovative use of the Section 106 process shows that the years of directed field research have done more to understand and manage the resources than 30 years of business as usual.



Oil tank and lines; excavating Bloom Mound, Permian Basin; Chaves, Eddy, and Lea Counties, NM (all photos courtesy BLM)

U.S. Custom House, New Bedford,
MA (photo courtesy Carol M.
Highsmith Photography, Inc./GSA)





CHAPTER

3

PROTECTING HISTORIC PROPERTIES

Ohkay Owingeh Pueblo housing preservation project, Rio Arriba County, NM (photo courtesy HUD)

For this report, federal agencies were asked to share with the ACHP and Secretary of the Interior information on how they protected historic properties in the period between 2014 and 2017. They were asked how their programs and procedures have changed or evolved; about their staffing levels, access to preservation expertise and continuing education; how they use partnerships to protect their historic resources; and whether they make use of Section 106 program alternatives to meet their stewardship responsibilities.

OVERVIEW:

Federal agencies protect historic properties in a variety of ways, through personnel education and development of in-house expertise, through Section 110 surveys and Section 106 agreement documents, and via partnerships. The list of diverse partnerships described in this report is only a sample of those presented by the responding agencies. The growth in numbers and variety over past reporting periods is a very encouraging sign, allowing agencies to leverage limited funding for preservation activities for greater impact. In many cases, the manners in which agencies are protecting their historic properties have not changed since the last report. In other ways, for example in the increased availability of education media and opportunities has changed dramatically; agencies have made solid progress in the number of properties protected, and the effectiveness in which they do this. The American people expect their important federal places to be effectively managed and protected, and the agencies are, more often than not, doing the best they can with the resources available to them.

“The continued efforts to tailor Section 106 procedures to the Armed Forces Retirement Home (AFRH) have resulted in a more effective, efficient, and thorough preservation program.”

Agency programs and procedures to protect historic properties:

Strides have been made since the last reporting period in 2015 in how agencies protect their historic properties. Agencies have been implementing and refining agency guidance and data management practices (like BLM, FWS, USGS, BOP, NASA, TVA, USIBWC) and/or through internal, cross-departmental preservation or resource-focused working groups (like GSA, DHS, National Oceanic and Atmospheric Administration [NOAA], BLM).

As in the past, the most effective and efficient manner in which federal agencies ensure protection of their historic properties is through proactive management—a combination of continual use and upkeep, condition monitoring, smart resource allocation, information-sharing among stakeholders, and use of staff expertise. Internal agency directives and policy set out how they will carry out these duties, with compliance with Section 106 and NEPA for the most part serving as the driving forces. Smaller agencies report that the identification and assessment of effect provisions in the Section 106 process are their most common protective tools, and they tend to rely more on contractors for their preservation activities than do larger federal agencies. Reporting agencies also cited compliance with the stewardship, permitting, and enforcement provisions of the ARPA, and with the consultation, excavation, and discovery provisions of the NAGPRA, as ways they protected historic properties.

Highlights:

- » NOAA's Federal Preservation Officer (FPO) developed a working group of line offices and legal counsel to look at ways to improve NHPA compliance and develop policies on addressing undertakings with no potential to cause effect.
- » TVA reports that by the end of 2017 it completed eight modules for the entries in the Integrated Cultural Database, that will cover Section 106, Section 110, ARPA, NAGPRA, site protection, site monitoring, Corporate History (the extensive historic photo collection), and reinterment data.
- » The BLM Preservation Board (see Text Box) continues to meet twice a year to, among other tasks, review preservation issues and make recommendations to leadership on policies and procedures, training, and monitor and provide expertise to field offices' historic preservation programs across the western states.

The BLM Preservation Board exemplifies how a land-managing agency can use an intra-agency working group to improve Bureau-wide consistency in preservation policies and procedures and enable field-to-headquarters communication using existing staffing. The Board is chaired by BLM's FPO and includes Deputy Preservation Officers from each State Office. The field organization is represented by four officials authorized to make land-use decisions and two field office archaeologists. The BLM Tribal Liaison Officer fills out the Board, bringing the day-to-day, operational staff perspective. Their charge is to review issues and make recommendations to the Director and State Directors about policies and procedures, training, certification of field offices, monitoring of field offices' historic preservation programs, and responses to public inquiries. In addition, the Board coordinates with the ACHP, NCSHPO, SHPOs, and THPOs.

Agency staffing to protect historic properties:

Most agencies report that the number of their employees tasked with maintaining their preservation programs (to include Section 106 compliance) have stayed generally consistent, varying by agency size and mission. Several agencies, however, reported unfilled vacancies in their CRM departments that may or may not be filled due to personnel or budget limitations.

Highlights:

- » As the largest federal land-managing agency (approximately 245 million acres) reporting, BLM has 212 archaeology positions (“an average ratio of 1.5 million acres of public land per cultural specialist”).
- » Reclamation has 43 full-time employees for its 7.1 million acres of owned land and easements.
- » FWS has 18 full-time positions for about 145 million acres.
- » GSA has 27 full-time employees and eight additional qualified personnel.
- » NASA reports having prioritized the need for cultural resources training as a Procedural Requirements dictate resulting in individual Space Center CRMs either meeting the Secretary of the Interior’s Professional Qualification Standards or receiving baseline CRM training within six months of their assignment with requirements for additional training courses every year.
- » USACE’s Southwestern Division has acquired a Regional Planning and Environmental Center which provides centralized cultural resources services to four Districts.

Access to preservation training and expertise:

Two major changes in access to expertise since the last Section 3 report have been an increase in the number and variety of webinars and on-demand training courses offered by and to federal agencies, and an increasing use of in-house teaching expertise. Several agencies reported benefits from these opportunities. Reduced travel budgets and the growing sophistication of the online experience are primary reasons for the first trend, while the steady growth in agency CRM expertise accounts for the second. Many federal agencies also host annual or regional meetings of their CRM staff, either stand alone or in conjunction with the larger professional organizations (the annual meeting of the Society for American Archaeology has in the past hosted many multi-day federal agency archaeology personnel meetings) but this has been in a slow decline due, again, to tight travel budgets.

Highlights:

- » By mid-2018 NASA expects to have both general and advanced online training modules covering Section 106 review, tribal consultation, treatment of historic properties, writing Section 106 agreement documents, and working with historic districts.
- » During 2017, NPS partnered with the ACHP to provide Section 106 training for new superintendents and facility managers at 11 locations around the U.S.
- » VA partnered with the ACHP and SHPOs of Alabama, Ohio, and Nevada to host historic preservation training for its facility and planning staff and its Veterans Integrated Service Network staff. In addition, approximately a dozen VA staff from across the country report having taken individual preservation training during the reporting period.
- » USCG partnered with the ACHP to present three tailored Section 106 training courses to USCG personnel across country in 2016.

CASE STUDY

HEADQUARTERS CONSOLIDATION REVIVES ST. ELIZABETHS NHL WEST CAMPUS

Among the most comprehensive mitigation efforts in GSA history are the research, recovery, education, and public access made possible by redevelopment of the National Historic Landmark St. Elizabeths [sic] hospital campus as the Washington, D.C. headquarters for DHS. GSA's ongoing collaboration with the DC Preservation League (DCPL) and others to provide monthly public tours; a brochure; video-recorded oral histories; conservation and digitization of historic drawings; an extensive archaeological research, recovery, and management program; laser documentation of the west campus buildings and landscape; Historic American Buildings Survey (HABS) and Historic American Landscapes Survey documentation; and a generously illustrated 300 page online book on the history of St. Elizabeths Hospital, earned the agency a Washington, D.C. Mayor's preservation award in 2014.

During 2015 construction, GSA discovered a 900-square-foot kiln used to make bricks for the 1852 Center Building and its extensions. Preservation and project team members collaborated with DCPL to document the discovery in a short video with the project archaeologist explaining the excavation and how the kiln was used. The kiln and other discoveries will be identified in wayside interpretive signs for campus visitors and workers to enjoy.





In 2016-17, GSA collaborated with the National Building Museum to display artifacts, architectural elements, historic photographs, documents, and models of the evolving campus in an exhibit entitled *Architecture of An Asylum: St. Elizabeths 1852-2017* (<https://www.nbm.org/exhibition/architecture-asylum-st-elizabeths-1852-2017/>). GSA's National Capital Region worked with museum curators to salvage building artifacts and locate items for exhibit selection and installation. Evocative displays include an iron-grilled doorway to a patient room; scrapbooks; letters; images of early electroshock equipment; dance therapy photographs from the 1960s; patient art; and a spectacular conserved 1904 model created for the St. Louis World's Fair. Relics of the hospital's past juxtaposed with images of recent development poignantly informed visitors about changing theories on how to care for the mentally ill and the government's capacity for improving the quality of life for individuals and communities, culminating in the transformation of the 300-acre campus into a federal workplace, smaller hospital, and mixed-use urban development.



Opposite: Aerial view of St. Elizabeths campus, Washington, D.C. (photo courtesy U.S. Coast Guard)

Top: Center Building (black and white photo courtesy Library of Congress; color photo ACHP)

Center: Installation view of *Architecture of an Asylum: St. Elizabeths 1852-2017* at the National Building Museum, Washington, D.C. (photo courtesy Yassine el Mansouri, National Building Museum)

Left: ACHP members on tour at the St. Elizabeths campus

Compliance with Section 106 was cited as the training most often taken. Of the 23 classroom training courses and 26 webinars the ACHP offered in 2016, about 80 percent of the 1,583 participants were federal staff.

GSA In-House Preservation Training: Between 2015-2017 GSA said its own preservation experts provided in-house training on preservation compliance in seven of 11 regions, and on specific topics such as terra cotta evaluation and repair, sandstone conservation, survey and stabilization of stone capitals, innovative vertical access for repairs at substantial heights, and exterior brick investigation. This and three other programs leverage GSA's in-house expertise, facilitate interaction between programs, and actively engage participants in resolving complex issues effectively.

Successful partnerships that protect historic properties:

The 2017 reports indicate that federal agencies are increasingly receptive to, and entering into, preservation partnerships to protect historic properties. These may be with another federal agency or with state or local governments, Indian tribes and NHOs, or private organizations. Some are short-term for a specific resource, while others are long-term protection or management relationships. Working to be better stewards with limited financial and personnel resources is the reason most often cited for these arrangements. It will become clear from this brief list that federal agency partnerships with others are critical to resource protection and must be fostered and encouraged. Such partnerships are especially important for agencies lacking specific kinds of expertise or stewardship capacity.

Highlights of partnerships among federal agencies:

- » Illinois: GSA and the USPS collaborated to restore and reunite two companion-New Deal murals in Chicago which had been separated since the 1980s. Strategically placed behind a glass façade, the former Chestnut Street Post Office murals are visible to pedestrians strolling by the post office building as well as customers inside.
- » Washington, D.C.: GSA worked with DOI to conserve and reinstall a 1938 Louis Bouche mural at the Stewart Lee Udall Building's newly rehabilitated auditorium for the enjoyment of employees and visitors.
- » Florida: NASA has entered into a partnership with the FWS and NPS to manage archaeological resources in the northern portion of the Kennedy Space Center (KSC), which includes portions of the Merritt Island National Wildlife Refuge and the Canaveral National Seashore. In this area, NPS has the responsibility to research, interpret, and protect archaeological resources, including the curation of artifacts at the NPS's Southeast Archeological Center. Projects with the potential to affect archaeological resources within the areas managed by FWS and/or the NPS are reviewed by KSC's Center CRM prior to ground-disturbing activity to ensure that adverse effects are avoided.

The National Aeronautics and Space Administration Procedural Requirements for Cultural Resources Management is the principal policy document governing NASA's CRM program. The document reflects NASA's position that successful management and protection of historic properties—known and potential—requires consideration by numerous parties early in the planning process, well in advance of any physical activities.

- » Texas: USIBWC partnered with the NPS to provide archaeological monitoring and looting protection during the reconstruction of the levee system surrounding Fort Brown NHL. Current plans are for the NHL to eventually be transferred to the NPS and incorporated into the Palo Alto Battlefield National Historical Park.
- » Mississippi: USACE Mobile District partnered with the Department of Justice, FWS, and the United States Marshal Service to form a task force for protection of historic properties on Mobile District land. This led to a sharp decrease in looting and resulted in 13 successful ARPA convictions.

The NPS Volunteers-in-Parks (VIP) program is authorized by the Volunteers-in-Parks Act of 1969. The purpose is to provide a means through which the NPS can accept voluntary help from interested citizens and international visitors in a way that is mutually beneficial to the NPS and to the volunteer. In 2016, more than 339,000 volunteers donated 8.06 million hours of service to national parks, including more than 351,000 hours toward cultural resources management. There are more than 390 volunteer programs throughout the National Park System, and the numbers of volunteers and hours has grown an average of 5-7 percent annually since 1990.

The USACE partners with various cooperating associations to provide resources and volunteers in the protection and interpretation of historic properties. In 2016, 174 USACE operating projects conducted interpretive programs for 30,037 visitors on-site, and 13,500 contacts at off-site programs at schools and other community venues.

Highlights of federal agency and state and local governments' partnerships:

These partnerships are important because they vest the community in the preservation of the historic properties and highlight the significance of the local connection.

- » Tennessee River Valley: TVA's ARPA Investigations Team and Enforcement Program (commissioned federal investigators and specially trained archaeologists) focuses on patrolling and monitoring historic properties to reduce the destruction and removal of archaeological artifacts from TVA land through the criminal prosecution process outlined in ARPA. (Archaeological sites on TVA land, as well as on BLM and Reclamation's lands, have continually been vulnerable to looting activity given their often close proximity to the water and remote location.)
- » South Carolina: Through a 2015 GSA loan agreement, the South Carolina Institute of Archaeology and Anthropology led the recovery of cannons from a sunken Confederate gunboat (C.S.S. *Pee Dee*) found in the Pee Dee River in South Carolina. The recovery is documented in an online video (<https://www.youtube.com/watch?v=ZBhPa3sAV0M>) made prior to conservation of the cannons that will be displayed at a local VA facility.
- » Maryland: At the NPS Antietam National Battlefield, 1,878 volunteers donated 28,761 hours of their time during FY 2016. In terms of estimated dollar value, these volunteers provided more than \$677,600 of service to the park. While much of the total volunteer hours benefited major events such as the Battle Anniversary weekend when the park received more than 5,000 visitors, the park also received 722 hours of volunteer time in its museum and library.

- » Nevada: Reclamation's Lower Colorado Regional Office works in partnership with the Southern Nevada Water Authority and the Clark County Department of Parks and Recreation to manage, preserve, and interpret cultural resources along Las Vegas Wash within the Clark County Wetlands Park.
- » Wyoming: BLM's Wyoming Newcastle Field Office partnered with a Wyoming Conservation Corps team to remove fire killed trees and deadfall from areas near 38 petroglyph panels to protect them from future wildfires and clear access along walking routes used on public tours. The crew also removed tangled fencing and fence posts that had been uprooted during a flash flood, which had hindered access to a large petroglyph panel.
- » New Mexico: In 2014 the USACE's Albuquerque District implemented the "Cerrito Recreation Area Site Protection Measure Study," in partnership with the New Mexico SHPO and tribes at Abiquiú Lake, to address recreational access and impacts to historic properties. This will provide valuable data to resource managers regarding effective site protection measures in high traffic areas.

Highlights of federal agency and tribal partnerships:

There is significant room for more varied partnerships with tribes. Tribes can be especially effective partners; they have special expertise about what makes a property significant, and often have strong historical and cultural connections with them. Federal agencies report very few historic preservation partnerships with NHOs.

- » New Mexico: Reclamation partnered with the Nambe, Pojoaque, San Ildefonso, and Tesuque Pueblos to complete four large archaeological surveys of the impact corridors for the Aamodt Project, a large project to deliver water to four New Mexico pueblos.
- » Pacific Northwest: USACE's Portland District partners with the Columbia River Inter-Tribal Fisheries Enforcement (CRITFE) department to patrol more than 150 miles of shoreline on the three lower Columbia River reservoirs, resulting in reduced looting of historic properties. CRITFE also provides training to local law enforcement, park rangers, and tribal members.

BLM Ethnographic Outlaw Cave, Montana (Photographs courtesy of Chief Dull Knife College, provided by BLM)



CASE STUDY

BUREAU OF LAND MANAGEMENT DATA SHARING PARTNERSHIP

BLM continues a 20-year partnership with the SHPOs of Alaska, Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, and Wyoming that makes historic property data available to other federal agencies, Indian tribes, consultants, and academics. The Cultural Resources Data Partnership (CRDP) includes financial support to SHPOs to maintain statewide inventories and allows technical support between SHPOs and the BLM.

The geographic information data describes information on historic properties of all types, including archaeological sites, historic structures, TCPs, and cultural landscapes. The project involves digitizing and automating BLM site records, locations, and surveyed space and making this information widely available and usable by multiple entities. The goal is to invest in developing the SHPO data management systems, pursuant to the NHPA, creating a shared inventory of cultural resources data, rather than having BLM also maintain a separate inventory, which significantly reduced costs and redundancy.

The data-sharing project began in 1998 as a provision of the nationwide Programmatic Agreement between the BLM, the ACHP, and NCSHPO. At that time, it was viewed as a five-year project but has evolved into a long-term partnership between the BLM and the 11 western states where BLM has significant land managing responsibilities.

In 2008, the CRDP received the Special Achievement in Geographic Information Systems award from ESRI (a pioneering GIS software company) for data sharing that is propelling BLM and the SHPOs into managing thousands of public lands' cultural resource sites uniformly, cohesively, and comprehensively. In 2009, the project received the ACHP's Chairman's Award in recognition of a combined effort among the BLM and the SHPOs that enables cultural resource professionals to have consistent, reliable, easy-to-use spatial information systems on their desktop computers to support informed federal decision making. The CRDP demonstrates how federal and state interests can work together to advance shared objectives for the common good of resources and streamlined and efficient business practices.

The Cultural Resources Data Sharing Partnership (CRDSP)

Modeling
In this example, archaeological sensitivity zones were constructed using standard deviation of slope (employing 10m DEM), landform, and hydrology, verified by hill shade modeling. Archaeological sensitivity was tested and confirmed by a 20% field sample. Sensitivity zones are useful for protection, planning, and management, informing fieldwork focal areas.

Research
The map below shows an obsidian source area and associated cobble flows. GIS was employed to predict flow distribution, verified through field sampling. Such flows offered prehistoric toolmakers attractive sources of raw material. Models such as this allow hypothesis testing and confirm predictions about landscape features and how hunter-gatherers behaved in the past.

MISSION

- Ensure field staff have the **Best** information at all times
- Save money, time, effort by sharing tools and development
- Share information through standards and common methods
- Measure progress, savings and accomplishments, realized through efficiencies

ACHIEVEMENTS

- Significant applications in federal and state programs
- Digitization of more than 1/2 million paper records with partners
- Standards for information formats and metadata
- "Local" value in management, planning, outreach, and research

Data Management
Each year, BLM reserves over ten thousand land use actions. Each generates information about cultural resources. GIS provides an efficient, practical method for organizing and display this information.

Resource Management
Spatial information is the basis of all resource management activities. GIS and digital datasets created through the CRDSP make rapid, key, management decisions possible. In the wildfire response below, shared digital data allowed firefighters an opportunity to protect significant resources.

Awards

- 2008 - ESRI SAG Award, recognizing outstanding work in the field of GIS
- 2009 - Advisory Council on Historic Preservation Chairman's Award, recognizing outstanding efforts in preserving America's heritage

The BLM works in partnership with the state historic preservation offices in 11 western states (Alaska, Oregon, California, Nevada, Arizona, New Mexico, Colorado, Utah, Idaho, Wyoming, and Montana) to develop data sharing for the cultural and historical resources they manage. For more information about the CRDSP, visit the website at: <http://www.blm.gov/eis/whysubs/crsp/crsp.asp>

ACHP

CHAIRMAN'S AWARD FOR FEDERAL ACHIEVEMENT IN HISTORIC PRESERVATION

presented to the

**U.S. Department of the Interior
Bureau of Land Management**

for the Cultural Resources Data Sharing project - operating in 11 western states in conjunction with their State Historic Preservation Offices

August 19, 2009

[Signature]
Chairman

ACHP Chairman's Award certificate from 2009

Cultural Resources Data Sharing Partnership poster (courtesy BLM)

CASE STUDY

TENNESSEE VALLEY AUTHORITY PARTNERS TO PROTECT ROCK SHELTER ART

Indian tribes have occupied northern Alabama for millennia, and for 600 of those years, a pair of bluffs overlooking the Tennessee River in Marshall County have provided a glimpse into their history. Although visible for ages, etched and painted images on the “Painted Bluff,” as the site has come to be known, were first documented in the 1823 book *The Natural and Aboriginal History of Tennessee*.

The movement of settlers into the area during the 19th century resulted in displacement of the original inhabitants. As a consequence, many of the tribes that originally occupied this area have moved further south and west, but their ancestral, cultural, and spiritual ties to the traditional cultural and sacred places in this area remain strong. As the centuries wore on, impacts from man and nature alike took their toll on the sacred images. The effects of modern-day graffiti on the more than 80 animal effigies, ovals, circles, and other abstract symbols were documented in the 1950s.

In 2004, a team of archaeologists from the University of Tennessee noted that, in addition to damage from vandalism and rock climbing at Painted Bluff, humidity and erosion were causing pictographs at the NRHP-eligible site to chip and flake away.

The Painted Bluff overlooks land at TVA’s Wheeler Reservoir. The agency worked with the Alabama Historical Commission to have the site named to its 2013 “Places in Peril” list, highlighting the state’s most endangered landmarks.





Dancing human image, graffiti removal at Painted Bluff (photos courtesy TVA)

The following year, TVA hired consultants to study the damage to the site. They recommended a multi-faceted approach to address the problem, including removal and camouflaging of the existing graffiti, along with public outreach and volunteer involvement. With the removal and camouflage plan in hand, TVA initiated a Section 106 review with the SHPO and 15 federally recognized tribes that have ties to Painted Bluff as part of a broader commitment to protect and provide stewardship for these important places. The tribes recommended that images impacted through natural weathering be left alone, and that the focus of any remediation work should be on human impacts to the site—in particular, those caused by rock climbing.

In 2014, TVA worked with the consultants and community volunteers from northern Alabama and University of Alabama students to catalog, remove, and disguise the damage at Painted Bluff. Graffiti 50 years or older was left in place pending further research, while disturbances less than 50 years old were removed or camouflaged.

Ultimately, graffiti was remediated at more than 120 different surfaces. Next, TVA collaborated with the Southeastern Climbers Coalition to close climbing routes located along the bluff, and to install signs alerting climbers of the closures. Finally, TVA used Painted Bluff as a proving ground for an archaeological site monitoring program called “A Thousand Eyes.” Volunteers went through the program training course, and then recorded data on the site that was submitted to TVA. The agency continues to work with the historical commission and student volunteers to protect and monitor the site.

Opposite: Painted Bluff from a distance, Marshall County, AL (photo courtesy Alan Cressler)

Highlights of federal agency and non-governmental partnerships:

Historic properties benefit from having private partnerships with knowledgeable organizations concerned with their preservation. Such partnerships benefit federal agencies by providing often no (or low) cost expertise and personnel to help preserve and tell the story of the property, while giving those concerned with its future a voice and stake in its continued existence.

- » Texas: The Federal Aviation Administration (FAA) partnered with the Texas Air and Space Museum to complete the display of its historic Douglas DC-3 Aircraft, which had a significant role in the development and modernization of flight inspection standards and aircraft design.
- » Washington, D.C.: AFRH partnered with the National Trust for Historic Preservation's President Lincoln's Cottage at the Soldiers' Home to enhance heritage tourism and educational programs for the campus.
- » VA has entered into two formal agreements to permit external fundraising for specific historic preservation projects: at VA Medical Center (VAMC), Dayton, Ohio, which was selected to host a Departmental history center, a community coalition will fundraise to rehabilitate Buildings 116 and 129; and at Greater Los Angeles Healthcare System, the 1887 Fund will fundraise to rehabilitate five West Los Angeles VAMC campus buildings, including a long-vacant chapel.
- » Florida: FWS has partnered with the University of Florida to conduct archaeological investigations at Lower Suwannee and Cedar Key National Wildlife Refuges as part of a long-term scientific research partnership.
- » The West: BLM partners with museums and universities to manage its collections and maintains three unique repositories: the Anasazi Heritage Center (Colorado), the Curation Center (Montana), and the National Historic Oregon Trail Interpretive Center (Oregon).
- » Washington, D.C.: Department of the Treasury partnered with the Treasury Historical Association, which provided funding for the restoration of the Treasury Building's West Stair balustrade and for the conservation of objects in the Treasury Collection.
- » VA's National Cemetery Administration is working with Friends of Historic Jefferson to rehabilitate the Jefferson City, Missouri, lodge, and with the Wilmington Historical Society to rehabilitate the Wilmington, North Carolina, lodge.
- » The West: BLM's Site Stewardship Program is active in almost every state where BLM has a presence. Some states like Arizona and California have been working with volunteer stewards for decades. After archaeological field training, steward volunteers record new sites and monitor previously discovered sites, providing important support for Section 110 responsibilities.

CASE STUDY

NASA RESTORATION OF MISSION CONTROL CENTER



Johnson Space Center (JSC) is restoring its Apollo Mission Control Center (MCC) NHL back to its appearance during the moon landings. In 2014, the NPS expressed concerns about the NHL's future, resulting in a partnership formed among JSC, the non-profit Space Center Houston (SCH), and the City of Webster, Texas, with support from the ACHP, the Texas SHPO, NPS, the National Trust for Historic Preservation (NTHP), and retired Apollo Program flight directors to restore the Apollo MCC to its late 1960s appearance. The restoration will be carried out with the aid of a historic furnishings report prepared by the NPS. Section 106 consultation in April 2017 resulted in a no adverse effect determination with concurrence from all consulting parties. Execution of the project has been enabled by the fundraising efforts of SCH (an affiliate of the Smithsonian), with a significant donation from the City of Webster, which seeks to promote heritage tourism in the area. Because NASA is prohibited by law from accepting private funds, the cost of the restoration is through a transfer of funds from SCH to the ACHP, which does have the authority to accept donations of money, equipment, and other resources from public and private parties to assist federal agencies in the preservation of their historic properties. This authority came about through 1976 amendments to the NHPA and was further extended in 2003 by President George W. Bush, as part of the Preserve America EO. The NASA award is the first such use of the authority and highlights the benefits and opportunities available through public-private partnerships. The ACHP hopes to encourage more such usage of this donations authority in the future.

Apollo Operations Mission Control Room, Johnson Space Center 1969, Houston, TX (photos courtesy NASA)



Using Section 106 program alternatives to manage and protect historic properties.

Compliance with Section 106 was cited by numerous respondents as their primary mechanism to protect their historic properties. While some agencies utilize the standard review process set out in the ACHP's regulations (36 CFR §§ 800.3-7), others find it advantageous to use a tailored approach. Section 800.14 of the ACHP's regulations lays out these tailored approaches to meet agency Section 106 obligations and preservation challenges. The ACHP specifically asked for information regarding this trend to determine the extent to which agency use of program alternatives assisted them in better protecting and managing their historic properties. This will in turn assist and inform the ACHP in determining whether to devote additional resources to their propagation and use.

The two most common program alternatives are Programmatic Agreements (PAs) and Program Comments. While most federal agencies use Programmatic Agreements on a case-by-case basis to address complex projects, several large land-managing agencies have used them to implement a consistent approach to NHPA compliance across the country. A greater number have used Programmatic Agreements to tailor Section 106 review to the management needs of specific regions or units.

Agencies independently reported that time invested in developing and negotiating PAs has been well spent and determined that the agency can comply with the requirements of Section 106 in a more effective and efficient manner in a variety of ways. These include institutionalizing activities that are similar and repetitive in nature, by stipulating roles and responsibilities, excluding certain categories from further Section 106 review, establishing protocols for consultation to facilitate the identification and evaluation of historic properties, and streamlining the resolution of adverse effects. These innovative comprehensive approaches could be used as a model by land-managing agencies in identifying locations suitable for energy development while considering effects to historic properties, thus increasing predictability for both project sponsors and consulting parties.

Highlights:

- » In 2016, BLM California executed a PA with the California SHPO and the ACHP for the Desert Renewable Environmental Conservation Plan. The Plan directs possible siting for future utility scale renewable energy projects on BLM-administered lands in the southern California deserts. Consultation included outreach with 45 federally recognized tribes; seven tribal organizations; 89 federal, state, and local agencies; 42 academic institutions/museums/historical societies; 29 industry representatives; 72 other organizations; and five individuals. Key aspects of the PA include cultural resource sensitivity analyses intended to inform siting decisions and to start project specific discussions early between consulting parties; a scientific peer review process; a cultural resource training program; and a regional compensatory mitigation program addressing cumulative effects.
- » In 2016, GSA's Rocky Mountain Region became the fourth among 11 regions to negotiate a multi-state PA, reducing GSA's compliance workload for routine repairs at historic buildings. The PA has already cut the region's Section 106 correspondence by 55 percent. Half of GSA's historic building inventory (by number and statewide coverage) now benefits from streamlined compliance through regional PAs.

CASE STUDY

PARTNERSHIP SAVES HISTORIC LIGHTHOUSE



Many of GSA's most noteworthy compliance successes result from partnerships that GSA initiates or substantively guides. The Gay Head Lighthouse in Martha's Vineyard has special significance to the community and nation as the only lighthouse with a history of Native American lighthouse keepers. For decades, it was owned by the USCG and maintained by the Martha's Vineyard Museum. The light within the tower continues to guide traders, fishermen, cruise ships, and recreational boaters today.

When erosion of the Gay Head Cliffs threatened catastrophic loss of the lighthouse, GSA led negotiation among five consulting parties resulting in a Section 106 Memorandum of Agreement detailing all conveyance responsibilities in time to relocate the lighthouse 50 feet inland before the onset of the summer storm season. The town of Aquinnah, Massachusetts, agreed to complete photo documentation of the lighthouse and to place interpretive signage at the site of the lighthouse's former foundation. Aquinnah and the Martha's Vineyard Museum agreed to rehabilitate and maintain the lighthouse, operating it as a museum again.

The move drew national attention and was featured in a NOVA episode (<https://www.youtube.com/watch?v=wmQO3ahvCwI&t=1sand>). CNN named Gay Head one of the five biggest preservation "wins" of 2015. GSA's subsequent collaboration with the ACHP to document the undertaking in a "106 Success Story" (<http://www.achp.gov/docs/gay-head-lighthouse.pdf>) will benefit future conveyances requiring cooperation among several organizations to preserve historic property at risk.

Moving the Gay Head Lighthouse, Aquinnah, MA (top photo courtesy Derrill Bazzy; bottom photo courtesy Drew Kinsman)



The challenge of protecting widely dispersed historic resources.

Several agencies, including Reclamation and NOAA, specifically noted that historic properties spread over vast areas of land or water presents a unique management challenge. Reclamation sums it up best: “protection of archaeological properties continues to be difficult given the large inventory of widely distributed sites, often in remote locations or with difficult access, and budget and staff limitations that by necessity focus time and funding upon Section 106 compliance.”

NOAA cites the diverse and widespread positioning of its properties as a challenge for property management, which relates directly to limited staff to address historic preservation issues. NOAA’s Papahānaumokuākea Marine National Monument is one of the largest marine conservation areas in the world (and a World Heritage Site), and contains both terrestrial and underwater historic properties—shipwrecks, archaeological sites on both land and in the water, and places of traditional cultural importance to the Native Hawai’ian community and Pacific Islanders. FWS also is responsible for administering far flung resources: seven National Wildlife Refuges (NWR) in the Pacific Remote Islands Marine National Monument, including Baker Island NWR, Howland Island NWR, Jarvis Island NWR, Johnston Atoll NWR, Kingman Reef NWR, Palmyra Atoll NWR, and Wake Atoll NWR.

These agencies, along with BLM and TVA, note that current allocations are typically only sufficient to address problems brought to their attention.

In 2017, the ACHP issued the *Program Comment for Telecommunications Infrastructure on Federal Property*, developed through an interagency effort led by DHS, to expedite Section 106 compliance for the installation of broadband technology on federal lands addressing regulatory barriers and encouraging investment and training in order to provide access to broadband services for tribal, rural, and underserved communities. It is currently applicable to all DHS Components and the NPS, Forest Service (FS), Bureau of Indian Affairs (BIA), Rural Utilities Service (RUS), and BLM.

From BLM’s 2017 report: “The BLM’s national Programmatic Agreement with the ACHP and NCSHPO is a critical mechanism for achieving efficiencies in the Section 106 review process. In addition, the tools and processes developed by the Cultural Resources Management Program streamline the compliance process, providing flexibility and cost-savings for the bureau and land-users.”

The majority of negotiations for the CBP’s Northern and Southwest Border PAs focused on reducing the review of routine and repetitive activities that have been found to not adversely affect historic properties’ NRHP qualifying characteristics.

VA executed a statewide Programmatic Agreement for 10 medical centers in Florida in 2015 to increase compliance efficiency and focus preservation review on the single historic medical campus.

CHAPTER 4

USING HISTORIC PROPERTIES



United States Coast Guard Cutter *Eagle* under full sail (photo courtesy U.S. Coast Guard)

Federal agencies were asked to share with the ACHP and Secretary of the Interior information on how they used their historic properties between 2014 and 2017. They were asked how this use contributed to local communities through economic development and heritage tourism, and if partnerships assisted; how they achieved resiliency goals; their success at leasing excess buildings and structures; and, the potential impacts of several recent federal laws aimed at further “reducing the footprint.”

OVERVIEW:

Federal agencies as a whole continue to make efforts to use their historic buildings for mission needs, and have a variety of mechanisms at their disposal with which to do this. Where feasible rehabilitation to meet “green” or LEED standards is now more common than it was in the last reporting period. Leasing and reuse are especially important as properties in use are better maintained and cared for, can be made energy efficient and green, and often were built to high construction standards (an underappreciated reason for their continued existence). Agencies like GSA and NASA (and now the VA) continue to find innovative ways to lease out unused or unneeded facilities or space.

Cost Savings and “Reduce the Footprint” Goals.

Per Office of Management and Budget (OMB) Management Procedures Memorandum 2015-01, Implementation of OMB Memorandum M-12-12 Section 3: Reduce the Footprint, dated March 25, 2015, all Chief Financial Officers (CFO) Act executive branch departments and agencies are required to “aggressively to dispose of surplus properties held by the Federal Government, make more efficient use of the government’s real property assets, and reduce the

total square footage of their domestic office and warehouse inventory relative to an established baseline.” Through strategic planning, reinvestment, and consolidation, agencies continue to use historic properties to achieve their “Reduce the Footprint” goals. For example, GSA reported to the ACHP that during the 2015-2017 period, it initiated 49 projects that will save federal taxpayers and 26 agencies more than \$47 million in projected rents at federal facilities across the nation. Many of these projects consolidate federal tenants in historic buildings or enable agencies to use them more efficiently with mobile workplace technology and space sharing solutions.

GSA has also worked closely with the Administrative Office of the U.S. Courts, one of their major tenants, to rethink planned expansion projects wherever opportunities exist to cost-effectively reuse government-owned buildings. This reduces the amount of new construction required to accommodate increased caseloads. Twelve projects will consolidate federal tenants in historic public buildings to reduce the government’s reliance on leasing and shrink the federal real estate footprint. Major modernizations and consolidations completed during the previous reporting period are yielding taxpayer savings, according to GSA. In addition, energy use data show significantly increased benefits when agencies vacate costly leased space for federally owned historic buildings that have been rehabilitated for improved energy savings and space efficiency.

VA Secretary David Shulkin announced in June of 2017 a plan to dispose of all vacant VA buildings in 24 months (either by demolition or reuse). VA’s list of 400+ vacant and 750+ underutilized properties include a significant portion of NRHP-eligible or listed historic properties. VA is currently in the initial stages of framing a Section 106 Program Comment to address this challenge.

As recommended in GAO studies, GSA is now broadening the scope of courthouse expansion funding requests to include plans for reuse, reprogramming, or disposal of existing courthouse facilities, giving preference to alternatives that reuse historic buildings, when feasible. The 2016 courthouse program includes funding for rehabilitation and annex construction that will supplement, rather than replace, three monumental historic courthouses, so they may remain in use and serving the purpose for which they were built. These iconic buildings have served the courts well for upwards of 85 to 123 years.

Contributing to local communities through economic development and heritage tourism.

An important component of federal policy (e.g., EO 13006: *Locating Federal Facilities on Historic Properties in Our Nation’s Central Cities* 1996 <http://www.achp.gov/EO13006.html>) and the Preserve America EO [<http://www.preserveamerica.gov/Executive%20Order%2013287.pdf>] is the emphasis on location of facilities in central cities and downtown areas, to maintain a convenient “federal presence” and strengthen the vitality and livability of the communities and, where possible, foster heritage tourism. Reuse of historic buildings and structures is efficient, supports preservation, and has been shown to be good for the livability and economy of local communities (see also EO 12072, Federal Space Management, 1978 [<https://www.archives.gov/federal-register/codification/executive-order/12072.html>]; EO 13693 [<https://www.fedcenter.gov/programs/eo13693/>]; and Department of Transportation, Implementing Instructions-Sustainable Locations for Federal Facilities, 2011 [https://www.fedcenter.gov/_kd/Items/actions.cfm?action=Show&item_id=19447&destination=ShowItem]).

CASE STUDY

NATIONAL PARK SERVICE CONSOLIDATES AT SIGNATURE HEADQUARTERS BUILDING



In 2017, the NPS consolidated its cultural resources programs including, among others, the NRHP, the Historic American Buildings Survey, and Heritage Preservation Services, to reunite with other DOI programs in the 1936 Main Interior building for the first time in a half-century. Now named the “Stewart Lee Udall Department of the Interior Building,” this New Deal icon once again provides a consolidated headquarters and federal presence that is vividly tied to the agency’s mission. Buffalo motifs decorating its doors, Native American murals rimming its sky-lit cafeteria, and an extensive collection of WPA murals promotes the DOI programs and conservation philosophy to visitors and employees traversing the building’s corridors and stairways. Clad in Indiana limestone, with interior public spaces finished in durable Tennessee marble, the building was conceived for functional adaptability and long-term value. It was among the government’s first buildings to include movable steel partitions, acoustically treated ceilings, fire-proofing, central air conditioning, a central vacuum system, and a floor reserved for mechanical equipment. The six-phase rehabilitation project, undertaken by GSA, the building’s owner, built upon the building’s inherently sustainable attributes, adding green roofs and solar panels for renewable energy.



Counterclockwise: Stewart Lee Udall Department of the Interior Building, Washington, D.C. *Replanting the Wasteland*, by Ernest Fiene (photo courtesy Carol M. Highsmith Photography, Inc./GSA)

The mural is rolled onto a large cardboard tube to facilitate its removal from the wall and for safe transport to the conservation lab. (photo courtesy U.S. Department of the Interior Museum)

A conservator working on the Henry Varnum Poor fresco in the DOI headquarters building (photo courtesy U.S. Department of the Interior Museum)

“American Bison” by Boris Gilbertson, 1940, restored (photo courtesy U.S. Department of the Interior Museum)

CASE STUDY

DEPARTMENT OF VETERANS AFFAIRS CREATES ADDITIONAL HOUSING FOR HOMELESS VETERANS

The West Los Angeles VAMC has been serving veterans since 1888 when it was the Pacific Branch of the National Home for Disabled Volunteer Soldiers (NHDVS). It covers more than 400 acres along Wilshire Boulevard.

The campus has evolved dramatically over the years alongside veteran medical care. Architect Stanford White designed the Pacific Branch featuring wood buildings in the Shingle style. Some original buildings exist today, but most were replaced throughout the 1920s-1940s when the campus underwent a tremendous transformation as part of the VA Second Generation building campaign. Triggered in response to the increased veteran populations, the campaign changed the Branch into a planned campus featuring Mission Revival style architecture with connecting landscapes and open spaces. The Mission Revival-style Building 209 was constructed of reinforced concrete finished in smooth stucco with a terra-cotta tile roof. West Los Angeles VAMC was listed on the NRHP in 2014, with the historic district representing an excellent, intact example of a Second Generation veterans hospital built upon the campus of the first NHDVS branch on the west coast.

In 2011, the VAMC proposed to rehabilitate Building 209, at the time vacant, to provide long-term supportive residential housing for homeless veterans. The project would include seismic upgrades and a major renovation of the existing building. Recognizing that Building 209 was a contributing resource to the historic district, the VAMC consulted with the California SHPO on the effects of the proposed project on the historic property. While the rehabilitation would retain most of the building's contributing features by adhering to the Secretary of the Interior's Standards, the original metal windows would be replaced, causing an adverse effect on the property. Through additional Section 106 consultation an approach was found that would preserve the steel frames and sashes while replacing the existing glass with a new laminated glass, thereby addressing the energy performance requirements. With this solution, the VAMC was able to preserve the building and its historic elements, avoiding adverse effects altogether.

Opened in 2015, Building 209 provides housing and healing space for homeless veterans. It is an award-winning rehabilitation project that supports VA's mission of caring for the nation's veterans.





Opposite: Building 209 at West Los Angeles VMAC, rehabilitated exterior from historic parade field (photo courtesy Lawrence Anderson Photography)

This page: Rehabilitated lobby, refurbished windows, residential unit, main entrance (photos courtesy Lawrence Anderson Photography)



The reports received demonstrate that federal agencies accept these principles of location, reuse, and sharing their history with the public. GSA noted it has found that opportunities to lease space in nonfederal historic buildings most commonly arise when federal agency requirements are modest enough to be accommodated in a historic building. If an agency needs more space and federally owned facilities are not available, this usually requires leasing in contemporary buildings or new construction. Many GSA leases in commercial historic buildings are located in rural towns or small cities where rental rates for leased office space are low compared to rates for office space in metropolitan areas. One urban location where leases in historic buildings cost-effectively supplement federally owned space is Philadelphia, Pennsylvania. In 2016, GSA's Mid-Atlantic regional headquarters relocated to the historic mid-century Rohm and Haas Headquarters building near Independence Mall. After redesigning the leased workspace to reduce its headquarters footprint, GSA successfully backfilled the unoccupied space by relocating Census and VA offices from expiring leases in non-historic buildings to the Rohm and Haas Building. Concurrently, Health and Human Services downsized from a lease of 102,231 usable square-feet in the historic Public Ledger Building to 79,772 usable square-feet vacated by GSA's regional headquarters in the nearby historic Strawbridge and Clothier Building. A longtime shopping destination occupying 2.1-acres in the heart of the city's retail district, the historic department store building features a helipad, patios, marble lobby, and 12-15-foot ceilings.

Most responding agencies promote their historic properties where consistent with agency missions, and some agencies, like the NPS, FS, and BLM, include heritage tourism in their mission and land management strategies. Federal agencies responding provided examples that demonstrate a broad range of innovative and enduring ways they contribute to local communities and provide opportunities for the interested public to learn about the nation's collective history.

Many historic buildings and structures have been modified to serve successive programs and missions. Consistent with the ACHP's guidance on highly technical and scientific historic properties (<http://www.achp.gov/docs/consideration-highly-technical-scientific-facilities.pdf>) and NPS guidance on special categories of resources such as movable and aviation historic properties, federal agencies view this continual process of modification to be a character-defining feature of historic properties. Physical and operational security requirements impact the management of federally owned historic properties. In those cases, these considerations limit the opportunities for a federal agency to provide public access to its facilities.

NASA reports it is considerably less expensive to modify an existing building or structure than it is to construct new. NASA estimates 93 percent of its identified historic properties are in active use either by NASA or a tenant, and approximately 10 percent of historic properties are leased.

The qualifiers "consistent with agency mission" and "conflicts with agency mission" can have major effects on agency use of, and public access to, federal historic properties. Some reporting agencies like DHS said the nature of their missions or function of historic properties precluded active contributions to tourism or the local economy. Smaller agencies with very specific missions (e.g., Department of Labor, National Institute of Standards and Technology, BOP) faced the greatest challenge in this regard. They noted that by virtue of their presence in a community they were contributing to the local economy through employment and the acquisition of goods and services, but that opportunities for heritage tourism or visitation were limited at best. DHS said heritage tourism was not consistent with its mission or the use

of facilities. Opportunities for heritage tourism related to DHS facilities (as well as military installations and many Department of Energy [DOE] facilities) are limited due to security concerns which DHS does not anticipate changing. However, many agencies have robust use and visitation programs.

Highlights:

- » While it pursues on- and off-site opportunities to inform the public about its historic properties and foster heritage tourism, Reclamation reports the agency lacks a system for tracking visitation. However, the following examples illustrate how Reclamation is promoting heritage tourism and interpreting the historic significance of communities:
 - To make the sites more accessible without creating security and safety concerns, Reclamation and NPS partnered with CyArk to create a virtual tour of the historic Shoshone Powerplant at Buffalo Bill Dam, Wyoming, available to view on YouTube (<https://www.youtube.com/watch?v=0MvabiF-zXw>);
 - The Montana Area Office renewed a special use permit allowing the Fairfield, Montana, Chamber of Commerce to use the historic Greenfields Irrigation District office building for a local museum and RV parking;
 - The Dakotas Area Office installed interpretative signage at the former location of the Daniel Winter House, at the Lonetree Wildlife Management Area, North Dakota. Using text and HABS photography, the sign presents information on the unique puddled mud architecture used by early 20th century German-Russian homesteaders in the area.
- » The VA's two oldest buildings, both dating from ca. 1750, were recently renovated by the VA Medical Center Perry Point, Maryland. Building 501, the Mansion, will continue to be used for staff training, and formerly vacant Building 504, the Mill, will now house a museum interpreting the site's history.

BLM visitor data for FY15 indicated 3,412,888 visits to cultural sites; in FY16, that number increased almost a quarter-million to 3,637,818. Recreation on BLM lands contributed from more than \$162 million to more than \$186 million to local economies.

In 2016, 331 million visitors came to the national parks—America's special places cared for by the NPS family of 22,000 employees and 221,000 volunteers. In addition to spending the day exploring history and experiencing nature, national park visitors also spend money in nearby gateway communities helping to fuel local economies. An NPS report, *2016 National Park Visitor Spending Effects: Economic Contributions to Local Communities, States, and the Nation*, underscores the fact that national parks play a major role in attracting and sustaining local businesses and communities. According to the report, which was prepared by economists Catherine Cullinane Thomas of the U.S. Geological Survey and Lynne Koontz of the NPS, in 2016 visitors spent more than \$18.4 billion in communities near national parks, a sum that translates into 318,000 local jobs.

Partnerships in using historic properties:

Federal agencies continue to report diligent efforts to partner with other federal agencies, state and local organizations, Indian tribes, and private organizations to share the knowledge and experience of federal historic properties with the public. Judging from the attendance numbers some agencies provided, the interest in these properties out there is vast and growing.

CASE STUDY

TENNESSEE VALLEY AUTHORITY DAM CELEBRATES BIRTHDAY



TVA's Norris Dam 80th birthday celebration allowed the agency to connect directly with the local community and tell the story of its past and present through multiple activities. TVA was created in 1933 to improve the quality of life of the people of the Tennessee Valley through flood control, improved navigation, and affordable electricity. TVA's system of locks and dams is the tangible symbol of the agency's mission of service to improve life in the region. As part of the "Built for the People" campaign, TVA highlighted a major milestone for the first dam TVA built, Norris Dam, located on the Clinch River in east Tennessee. Agency staff hosted a family friendly celebration highlighting the anniversary of 80 continuous years of operation of this magnificent structure. The two-day public celebration featured a rare opportunity for the public to tour the Norris Dam Powerhouse, viewing the generators and the control room. They were allowed on the wing wall to view the massive spillway of Norris. Also as part of this event, TVA set up more than 20 tents of activities for the public to learn more about the agency. TVA partnered with the Knoxville Track Club to host "The Big Dam Race" which was an 8 km race across the top of Norris Dam. The target audiences were members of the general public served by TVA, TVA customers including local power distributors, and TVA employees and retirees. The event targeted a cross section of the public from baby boomers whose parents or grandparents helped build the dam to younger people and children not as familiar with TVA's history. The extensive media coverage generated a huge turnout—more than 30,000 people visited Norris Dam that weekend and learned about TVA's history.



Norris Dam 80th birthday public celebration (photos courtesy TVA)



left: Students from Vassar College in 1946 beginning a 10-day study of TVA and inspection of its projects. The field trip to Norris Dam was part of a new 10-week course, "The TVA—A Study in Regionalism" offered by the college. (photo courtesy TVA)

Highlights:

- » USCG continues its active partnership with GSA and NPS in ensuring the success of the National Historic Lighthouse Preservation Act (NHLPA), with 10 historic lighthouses entering into this program over the reporting period. The NHLPA program enables local communities to promote heritage tourism by transferring the ownership of historic lighthouses to new owners who rehabilitate and restore them as properties available for public visitation.
- » As the primary point-of-access for the general public, NASA's Visitor Centers represent a successful and high-priority partnership for the agency. Operated by private entities and located on or adjacent to NASA Centers, Visitor Centers provide a venue outside of the standard security requirements for the agency to receive and present information to the public. KSC and JSC are perhaps the most well-known and most visited of the NASA Centers, and their presence has contributed significantly to heritage tourism in their respective geographical areas.

Meeting federal resiliency goals.

Some agencies did not identify resiliency or sustainability, defined as “the capacity to recover quickly,” as significant issues in this reporting cycle. Most agencies did, however, note the importance of federal infrastructure resiliency and had made efforts to meet EO 13693 (*Planning for Federal Sustainability in the Next Decade-2015*) objectives of energy efficiency and resiliency and “green design.” The number of historic federal buildings now being LEED certified by the U.S. Green Building Council continues to rise. GSA continues to be in the forefront of historic building resiliency.

Many federal agencies reported policies and procedures across real property management and planning departments specifically addressing the need to consider repurposing of existing facilities—both historic and non-historic. Agencies continue to ensure their operations and actions are carried out in an environmentally, economically, and fiscally sound manner. Incorporating sustainable practices into their missions conserves energy and natural resources, reduces pollution and contamination releases, enhances the workplace through less exposure to hazardous materials and chemicals, and strengthens national security by encouraging energy independence. Several agencies have been compiling data to evaluate the threats of rising sea levels, increased risk of fire, drought, and erosion, to include potential effects to archaeological and historic sites.

Responding to interest from the movie *Hidden Figures*, KSC hosted several events to honor the legacy of female and African American employees and their contributions to the U.S. Space Program. In December 2016, it hosted a panel discussion with the director, composer, and actors of the film. Several screenings of the film were open to the public. Additionally, in honor of Women's History Month and African American History Month, presentations were given in 2017 by authors Wanda Harding, Richard Paul, and Steven Moss.

From the left are: former CNN space correspondent John Zarrella; Ted Melfi, writer and director of *Hidden Figures*; Actresses Octavia Spencer, Taraji P. Henson, Janelle Monáe; Pharrell Williams, musician and movie producer; and Bill Barry, NASA chief historian.



Highlights:

- » GSA's Green Building Upgrade Information Lifecycle Database (gBUILD) on High Performance Green Building (HGPG) projects demonstrates clearly that historic buildings can meet very rigorous standards for improved performance and efficiency. GSA has found most of these actions taken have little or no adverse impact on significant historic spaces and features.
- » In 2015, Reclamation's Lower Colorado Region was recognized by the U.S. Green Building Council with the LEED Gold Certification for integrating green, environmentally sustainable designs and energy efficient technological features into the major renovation of two historic buildings previously scheduled for demolition and located in and contributing to the Boulder City Historic District.
- » NASA mandates Centers to develop plans and strategies to incorporate technologies and best practices that will enable them to identify and execute the most cost-effective energy initiatives, which will improve NASA's energy security and reduce the Agency's total life-cycle costs in support of missions.
- » In 2017, CBP was awarded a joint award in the categories of Resilience Role Model and Historic Preservation for the successful modernization of programs and policies to anticipate, prepare for, and adapt to climate change impacts on operations and agency missions and outstanding achievement to further the goals of the NHPA. The project exemplified the successful collaboration between multiple offices and the Puerto Rico SHPO. The team worked to maintain the historical significance of the NRHP-listed Customs House, while meeting resiliency goals of protecting the building from rising waters, high winds, and other climate threats present in hurricane and flood zones, in addition to reducing energy consumption.
- » The Department of the Treasury takes advantage of inherent features in its historic buildings to maximize resiliency. Prime examples include large windows that support the use of natural lighting, high ceilings that allow greater air circulation, and a durable natural masonry exterior wall with a significant thermal mass to help regulate interior temperatures.
- » Through successful completion of project reports, contexts, and other deliverables from DoD's Legacy Resource Management Program, DoD is better positioned to manage its cultural resources for Defense mission sustainment and resiliency. Legacy provides tools to better enable DoD to enhance cultural resources through proactive management, which enables military readiness. Project examples from the reporting period include "Implementing Environmental & Economic Cost-Benefits of Reusing DoD's Pre-World War II Buildings," Legacy project #14-735; "Works of a Master? Addressing Evaluation of Routine or Prosaic Architecture by Famous Architects on Military Facilities," Legacy project #15-779; and "20th Century Building Materials and Suitable Substitutes For Exterior Finishes and Roofs," Legacy project #15-707.

Using historic properties through leasing.

For situations in which agencies may not have a current need for a historic property, but want to retain ownership of the property so it may be used to meet foreseeable needs, agencies lease the property to non-federal entities under Section 111 of the NHPA as a way to ensure their preservation. As time goes by, more agencies are exploring opportunities to outlease (as GSA refers to them) historic buildings and structures instead of outright disposing of them.

Outleasing minimizes federal maintenance costs, generates federal revenue that can be used for preservation purposes, and preserves these historic facilities themselves. Agencies with often very specialized properties, like NASA or the Department of Energy, have found leasing a viable alternative to demolishing them. At the same time, the leasing of historic properties to house federal functions, where practicable, extends the lives of those properties and provides a cost and maintenance advantage to the government.

Of the agencies responding to the Section 3 request for data, the federal agency with the most experience in leasing and exchanging federal property is GSA. Its use of Section 111 authority for leasing unneeded federal space to nonfederal entities, and finding space in non-federally owned historic properties, continues to make an important difference at historic buildings, especially in smaller markets, with buildings requiring only modest reinvestment to remain viable.

Most outleases fill vacant space or provide retail services in buildings predominantly housing federal agencies. While some are long-term and entire buildings are outleased, others consist of discretely placed rooftop antennae and short-term event space rentals. Between 2015 and 2017, GSA's short-term event space outleasing program has grown; historic buildings served as locations for more than 25 movies and television shows filmed by 21 production companies, including, among others: Alexander Hamilton U.S. Custom House, New York, New York (*Billions*, 2017, Showtime); U.S. Custom House, Baltimore, Maryland (*House of Cards*, 2013-present, Netflix Original Production); and, Federal Center, Chicago, Illinois (*Batman vs. Superman: Dawn of Justice* 2015, Warner Bros. Pictures). GSA's national preservation program supports this stewardship funding source with online guidance, along with sample documents that include GSA's standard license, permit application, special conditions and clauses for protection of historic finishes and fixtures. GSA regional preservation programs supplement this guidance with regionally focused training programs, manuals, brown bag events, and blogs that promote outleasing successes to GSA employees nationwide.

In accordance with the authority, GSA's outlease revenue is reinvested exclusively in historic buildings through a rigorous and highly competitive process, in which projects are required to meet the Secretary of the Interior's Standards. Combined with other funding sources, proceeds from Section 111 leases fill critical gaps and enable GSA to seize opportunities for meeting stewardship goals.

Highlights:

- » Nationwide: VA Secretary Shulkin approved use of the authority found in NHPA Section 111 to lease historic VA properties to external parties. The Office of Construction and Facilities Management is charged with implementing the program. A handbook detailing leasing procedures has been drafted, and initial solicitation for a pilot project in Sausalito, California, has been initiated. More than a dozen vacant cemetery lodges are also being considered for partnerships under this authority. At the same time, VA also continued to pursue multiple leases across the county, pursuant to its Enhanced Use-Lease (EUL) Program. The EUL Program allows VA to outlease its underutilized real estate to the private sector for up to 75 years for the purpose of developing supportive housing for homeless and at-risk veterans and their families. One such notable EUL currently under development, was the reuse of several NHL properties at the Clement J. Zablocki VA Medical Center in Milwaukee, Wisconsin, which will be rehabilitated for veterans' housing using historic tax credits.

- » Massachusetts: GSA rehabilitated the 1836 New Bedford Custom House, the oldest continuously operating custom house in the nation, and now it houses both CBP and NOAA operations. The building lies in the New Bedford Whaling National Historical Park and contributes to the New Bedford National Historic Landmark District. Work initiated between 2015 and 2017 includes exterior repointing, marble floor repair, energy saving HVAC upgrades, thoughtfully integrated exterior accessibility, and minor interior changes to accommodate NOAA. GSA strategically reinvested outlease proceeds, combined with other funds, and the building is now fully occupied by federal agencies.
- » Florida: NASA has a lease agreement with SpaceX for use of the NRHP listed Launch Complex 39A Historic District at KSC. SpaceX has managed to maintain a majority of the historic structure while meeting the current technological/operational needs for launch. In the past few months they have used this pad for historic first launches, including the first-ever return of a rocket first stage.
- » Michigan: USACE's Detroit District leases a building on the Soo Locks property for use as a maritime museum in the City of Sault Sainte Marie.
- » Washington, D.C.: GSA's long-term lessor concluded a \$200 million rehabilitation and adaptive use of the 1899 Old Post Office in Washington, D.C.'s Pennsylvania Avenue National Historic Site without any adverse effect to the historic building. The Romanesque Revival icon is now a hotel within pedestrian reach of museums, memorials, businesses, and government offices in Washington, D.C.'s monumental core. Revenue generated by the ground lease has already funded conservation of on-site art by Robert Irwin and the Benjamin Franklin statue on Pennsylvania Avenue. In 2017, the 315-foot bell tower reopened, offering panoramic views of the National Mall and landmarks of the nation's capital. Operated by the NPS, access to the tower is free and open to the general public.

Meeting the requirements of the Federal Assets Sale and Transfer Act and the Federal Property Management Reform Act.

Late in 2016, these two statutes were enacted that affect many real property-owning federal agencies. The Federal Property Management Reform Act (FPMR) tasks the FRPC with establishing a real property management template of measures, standards, milestones, etc. to reduce surplus federal property and achieve better utilization of underutilized property. Staff at GSA support the FRPC which issues the FRPP each year. Under the Federal Assets Sale and Transfer Act (FAST Act-Property), the yet-unfunded Public Buildings Reform Board is charged with identification of "high value assets" for disposal within a limited period of time. Both statutes seek to advance the goals of earlier "Freeze the Footprint" and subsequent "Reduce the Footprint" White House policies. Federal agency "Reduce the Footprint" policies and procedures, and related legislation, address protection of historic properties, in various ways.

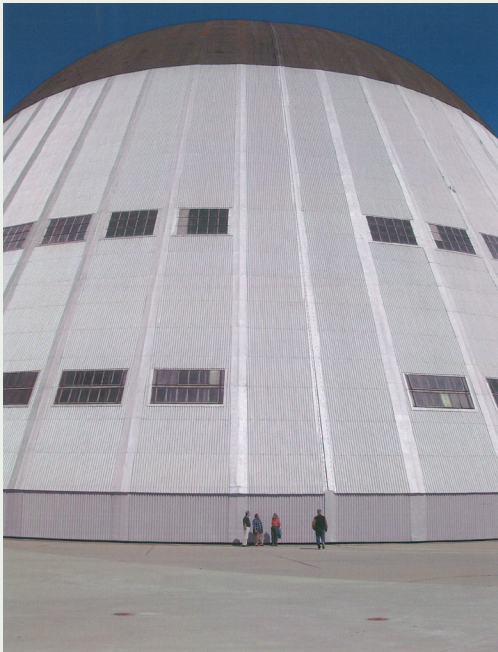
Of the federal agencies that responded to this question in the ACHP's reporting guidance, BLM, Reclamation, TVA, USPS, and the USCG are exempted from one or both laws by name. Other responding agencies, like DHS, own some properties that are specifically exempted "for reasons of national security."

The ACHP also supports the concept that Reclamation noted in its Section 3 report, regarding consideration of historic property values and significance as early as possible in disposal decision making because not all historic properties "hold a value that warrants their retention in the face of the expressed requirements to reduce the federal property inventory."

CASE STUDY

NASA, GSA, AND PRIVATE INDUSTRY COLLABORATE TO REHABILITATE HISTORIC AIRFIELD

In 2015 GSA concluded commercial lease negotiations to rehabilitate and operate NASA's 1,100-acre historic Moffett Federal Airfield in California's Silicon Valley. The 60-year public-private partnership between NASA's Ames Research Center (ARC) and Planetary Ventures (a subsidiary of Google) will eliminate NASA's management costs and rehabilitate the historic Hangar One for private business use while meeting the needs of the federal government and California National Air Guard to retain a limited use airfield. The lease area falls within the NRHP-listed Shenandoah Plaza Historic District. ARC is using proceeds from the lease to maintain and upgrade its historic properties. This is the first large-scale Section 111 lease NASA has executed, and it is serving as a model for future leases. (Note: NASA has previously entered into another Section 111 lease with Carnegie Mellon University to occupy Buildings 23 and 24 within the Shenandoah Plaza Historic District at Ames.)

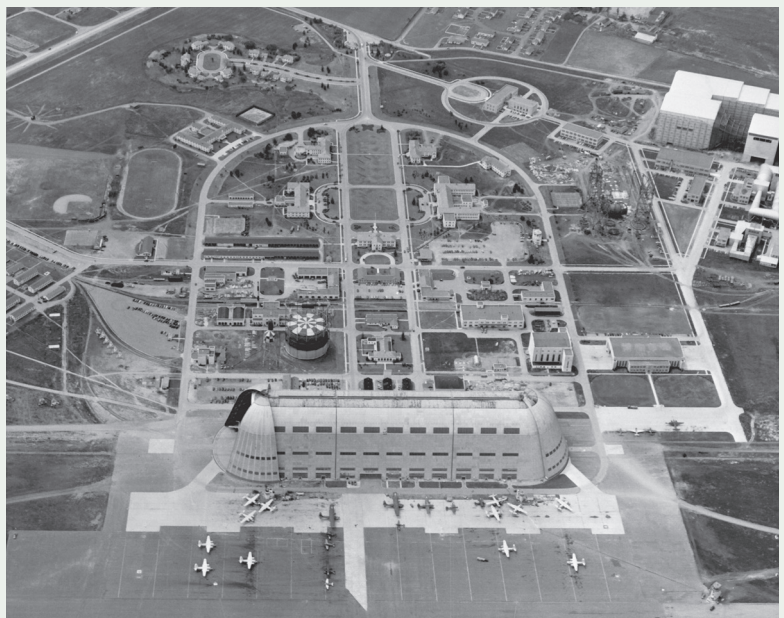


Hangar I at Moffett Field

2008 aerial view (color) of NASA research park, Moffett Airfield, CA showing Shenandoah Parade Grounds and Plaza

1943 photo (black and white) of N. Moffett Field, east from front gate toward Shenandoah Plaza and Hangar One

(all photos courtesy NASA)



To summarize the responses about impacts of the FAST Act-Property and the FPMR, it is too early to tell how compliance may yet affect the historic property holdings of federal agencies subject to their requirements. Large agencies with a solid inventory of their historic properties (like GSA or the USPS), and smaller agencies with few (NOAA, Treasury) or specialized historic properties (NASA, DHS) are in the best position to ensure that historic values are known prior to decisions about their future. Smaller agencies stated that their existing historic properties were fully utilized and they did not expect any changes in the foreseeable future. The Section 106 review process is the vehicle most agencies will use to ensure that a property's historic significance has a place in making decisions about retention, reuse, excessing, or disposal.

Highlights:

- » GSA issued templates and guidance for landholding agencies to submit data and recommendations for real property disposal, consolidation, colocation, reconfiguration or redevelopment in support of the FAST Act-Property footprint reduction and sales revenue goals.
- » Department of Labor explicitly states these laws will not affect its historic properties or affect the mission.
- » NASA submitted its recommendations for consideration by the Public Buildings Reform Board in April 2017, identifying three facilities for potential disposal. NASA expects to coordinate with GSA for compliance with Section 106, as appropriate for the transfer of property out of federal ownership.
- » During this reporting period the ACHP published *Guidance on Use of Real Property Restrictions or Conditions in the Section 106 Process to Avoid Adverse Effects* (<http://www.achp.gov/preservationconditions.html>). This guidance, with origins in the congressionally mandated ACHP report *Preserving Historic Post Offices: A Report to Congress* [<http://www.achp.gov/historicpostoffices.pdf>] is designed to assist federal agencies that are considering placing a covenant or Preservation Condition on properties they propose to transfer out of federal ownership. The use of a Preservation Condition to preserve historically significant characteristics of a property can lead to a finding of no adverse effect in the Section 106 review of the transfer. This guidance also educates preservation stakeholders on Preservation Conditions—what they are, who develops them, and their enforceability.

The ACHP strongly supports GSA's statement in its Section 3 report that historic building viability is best accomplished through:

- reinvesting in them to continue to meet federal workplace needs;
- reprogramming them to serve new uses as necessary;
- outleasing vacant or underutilized historic properties to non-federal tenants when there is no immediate federal need;
- leasing historic buildings from non-federal building owners, when no federal space is available;
- acquiring historic properties to meet federal needs, when acquisition is cost effective and prudent;
- and creating disposal strategies to promote preservation-appropriate reuse of historic properties.



CHAPTER

5

FINDINGS AND RECOMMENDATIONS

Civil War Cannons Recovered from the Pee Dee River near Florence, SC (photo courtesy Gerry Melendez, The State Media Company of South Carolina)

Federal agency progress reports and the interactions the ACHP has had with property managing agencies during this reporting period demonstrate that agencies are making important progress in identifying, protecting, and using historic properties. These reports and interactions also suggest that targeted assistance and adjustment to existing practice and policy would better position them to address current impediments and make further improvements to fully achieve the goals of this EO.

Agencies are clearly taking steps to improve their management and the condition of historic properties under their stewardship. While some agencies continue to face challenges incorporating historic preservation into their broader mission, as noted in this report even these agencies continue to evidence a commitment to the stewardship of historic properties as they carry out their missions. The steps agencies take to identify, protect, and use their historic properties vary widely given the diverse range of historic property types and agency missions.

In general, these reports demonstrate that the federal historic preservation program works to the benefit of the American people and the agencies that manage it. Federal agencies and the ACHP are advancing the Administration's agenda on infrastructure, and taken together, these broader efforts create jobs, stimulate tourism, and contribute to the economy.

The recommendations provided below are clearly achievable in order to further advance the stewardship of historic properties and the goals of this Administration. The ACHP has identified the following findings, which are accompanied by recommendations on specific actions the ACHP and others can take to resolve them.

FINDING:

Agencies that have already used Section 106 program alternatives were able to improve the efficiency and cost effectiveness of project reviews.

Title 41 of the Fixing America's Surface Transportation Act has had and will continue to have a significant impact for federal agencies that manage property and approve major infrastructure projects that may cross or fall within these properties, such as pipelines, transmission lines, and communication facilities. Commitments by the Administration to advance energy development mean that more infrastructure projects will likely occur on federal land. In its oversight of the Section 106 review process, the ACHP can, and has, played an important role in advising on program improvements for infrastructure and informing federal policy on improving environmental reviews.

Customizing Section 106 reviews for complex infrastructure projects and programs can improve the efficiency, effectiveness, transparency, and predictability of these reviews. While some agencies have utilized such tailored alternatives for transportation and communication programs, few program alternatives have been established for pipeline and transmission projects and other major infrastructure sectors.

Opportunities for the ACHP to collaborate with federal agencies on establishing program improvements and alternatives have been significantly enhanced by the ACHP's membership on the Permitting Council.

Recommendations:

- » *Agencies should strengthen and expand the use of Section 106 program alternatives to improve the efficiency and cost-effectiveness of project review for energy and infrastructure projects affecting historic properties on federal lands.*
- » *The Administration should continue to include the ACHP in policy level workgroups to identify ways to improve the effectiveness and efficiency of environmental reviews for infrastructure projects while promoting effective historic preservation outcomes.*
- » *The ACHP should continue outreach to industry, state and tribal officials, and other key stakeholders to identify and implement effective opportunities for improving Section 106 reviews for infrastructure projects.*
- » *Agencies should identify opportunities to improve coordination, collaboration, and support for the role of State and Tribal Historic Preservation Officers in Section 106 reviews on infrastructure projects.*

FINDING:

Efforts to identify historic properties and ensure that consistent information about historic property inventory efforts are made available electronically can better inform and improve real property management and federal and non-federal planning.

As illustrated in Chapters 2 and 3, there are a multitude of property management databases within federal agencies and State and Tribal Historic Preservation Offices. While the FRPP was intended to be a single government-wide inventory and tracking system for the government's real property, it has not been used as a stewardship tool and likely lacks the attributes to function as such. Neither federal building nor land managing agencies' Section 3 reports note a movement to its increased use as the mechanism to track sufficiently detailed

information about its full inventory of historic properties and how they are being used and protected. Further, there is also no evidence in the reports that land managing agencies are actively seeking to adjust the FRPP to meet their needs.

Following the Preserve America Summit in 2006 and in a variety of circumstances thereafter, the ACHP and other preservation organizations and stakeholders have urged federal and non-federal partners to support the development of a nationwide inventory that would include information about historic properties and past cultural resource surveys. Further investment in the development and completion of such a system would provide a significant return on investment in the form of providing accessible and consistent information to inform future project planning and development and, in doing so, assist applicants and federal agencies in better avoiding and managing impacts to historic properties in the future. The ACHP's recommendations have urged the development of such a system within State and Tribal Historic Preservation Offices, which have already built substantial inventories of historic properties within their respective boundaries in part to comply with the requirements of the matching funding they receive through the Historic Preservation Fund. While many SHPOs and THPOs have made great strides in the development and management of their own systems, they lack a broad mandate, guidance, and predictable resources to ensure these systems meet national standards and remain electronically available.

To meet the long-range goal of a more comprehensive inventory of the historic properties owned by the government, it will be critical that these various databases and tracking systems be able to communicate with each other, account for all kinds of historic properties using common metrics, and address rights of access, information content and ownership, and numerous other issues.

Recommendations:

- » *NPS, DoD, GSA, and the ACHP, in consultation with NCSHPO and National Association of Tribal Historic Preservation Officers, should review currently available systems and take steps to promote the development of an electronically available inventory of previous surveys and the presence of historic properties that meets national inventory standards.*
- » *The ACHP should continue to work with federal agencies as part of the Federal Permitting Improvement Steering Council to identify more efficient and effective ways to share secure information about the location and significance of historic properties.*
- » *Agencies should strive to identify and commit regular funding to meet the requirements of this EO and Section 110 of the NHPA to complete their inventory of historic properties under their ownership or control.*

FINDING:

Partnerships can leverage limited federal resources and provide important benefits to federal agencies in the identification, protection, and use of historic properties.

As set forth in Section 2 of the Preserve America EO, federal agencies should be encouraged to build and foster preservation partnerships consistent with agency missions. As has been made abundantly clear throughout this report, federal agencies rely on cooperative partnerships and relationships with the other federal agencies, states (and not just with SHPOs), Indian tribes, NHOs, and the private sector to achieve preservation objectives they otherwise could not meet by themselves. Generally speaking, federal agencies partner with other entities because they share or have adjacent cultural or natural resources; often are within the same

larger department so share common regulations or policies; look to others for particular kinds of assistance, expertise, or knowledge; and have a common interest in protecting historic properties and telling their stories.

In their responses, many agencies spent considerable time describing their partnerships, how they assist the agency, and their accomplishments. They are rightly proud of their ability to bring their history to the wider public, and it shows in their reporting. However, some agencies responded that they do not have or pursue preservation partnerships due to security requirements or other impediments. The value of partnerships is clear, and the following recommendations on steps agencies can take to develop, expand, and better use partnerships to achieve the goals of this EO are provided below.

Recommendations:

- » *Agencies that do not employ partnerships should identify and work to remove any factors that might limit their ability to enter into partnerships to assist them in addressing historic preservation goals and requirements.*
- » *The ACHP should work with the NPS and the Administration to expand and foster the Preserve America Stewards Program and other agencies to identify volunteer programs which include work on the protection of historic properties.*

FINDING:

Agencies would benefit from more effective mechanisms to ensure timely involvement of Indian tribes and NHOs in property management activities and infrastructure planning.

The challenges regarding tribal involvement in infrastructure projects were the focus of an unprecedented interagency tribal consultation effort in late 2016; the subject of a roundtable discussion at the Senate Committee on Indian Affairs in September 2017; and, the longstanding work of the ACHP. There remains a strong interest in seeing improvements among all involved, notably tribal leaders, federal officials, and industry representatives.

One outcome of the interagency consultation was a report issued by the ACHP, *Improving Tribal Consultation and Tribal Coordination in Federal Infrastructure Decisions* (May 2017) [<http://www.achp.gov/docs/achp-infrastructure-report.pdf>] which provided a number of recommendations on improving tribal consultation for infrastructure projects. These recommendations included, among other things, that federal agencies involved in infrastructure projects should develop guidance and procedures to improve coordination between applicants and Indian tribes prior to the selection of preferred alternatives, plan for consultation with Indian tribes on a landscape and programmatic level, and develop procedures for ensuring that consultation begins as early as possible.

In addition to the recommendations within this report, there are a number of other steps the ACHP and federal agencies that manage property can take to improve consultation with Indian tribes and NHOs regarding impacts to historic properties on federal lands and properties.

Recommendations:

- » *Federal agencies should ensure all staff are aware of, and act in accordance with, government-wide and agency policies and directives regarding tribal and NHO consultation.*
- » *Federal agencies should ensure all appropriate staff receives training in environmental and cultural resource/historic preservation responsibilities as well as tribal and NHO consultation.*
- » *The ACHP should develop guidance regarding early coordination with Indian tribes and NHOs in Section 106 and pre-application processes and incorporate training regarding tribal involvement in infrastructure projects into its new training products.*
- » *The ACHP should work with NPS to further train and advise federal agencies on appropriate steps to identify, manage, and protect traditional cultural places of significance to Indian tribes and NHOs, including updates to existing NRHP Bulletins and guidance.*

FINDING:

Further development of policies and procedures to assist federal agencies in considering historic properties as part of their efforts to comply with “Reduce the Footprint” requirements would improve preservation outcomes without delaying compliance with these requirements.

As discussed above, the Federal Assets Sale and Transfer Act and the Federal Property Management Reform Act present historic preservation challenges and opportunities. These two laws will have a significant impact on how the federal government will consider historic significance in its footprint reduction strategies and initiatives.

While agencies generally are meeting the requirements of these acts, it is often challenging for them to factor historic preservation goals and values early in agency planning to reduce federal property holdings. Developing clearer policy and procedures on when and how to consider the historic preservation values of federal assets that may be historic would better inform decisions as to whether to dispose of such an asset and help ensure the protection of those historic properties that leave federal ownership.

Recommendations:

- » *The ACHP should continue to work with the FRPC, GSA, and OMB to expand and improve the ACHP’s access to data within FRPP so it can continue to assist in refining data fields that provide information about federally owned historic properties and to use these data to measure trends and make recommendations on improving the management of federally owned historic properties.*
- » *The ACHP should identify and work with all agencies with independent disposal authority, including GSA, to develop and publish guidance on best practices and program alternatives to help those agencies complete preservation compliance for such disposals.*
- » *The ACHP should expand and promote its Guidance on Use of Real Property Restrictions or Conditions in the Section 106 Process to Avoid Adverse Effects to assist federal agencies in developing more effective uses of preservation covenants to expedite the disposal of historic properties by avoiding adverse effects.*
- » *The ACHP should continue to work with the USPS to implement recommendations within the ACHP’s earlier report, Preserving Historic Post Offices: A Report to Congress and identify other areas where it can collaborate on improving current inventory and control mechanisms that assist USPS in managing its historic assets.*

FINDING:

Fostering and encouraging the reuse of historic facilities by federal agencies or others creates cost-effective preservation outcomes.

In an effort to reduce their real estate footprint many agencies consolidate multiple offices into one central office. Others seek downtown or Main Street locations to serve growing urban populations. Centrally located, federally owned historic buildings help agencies meet consolidation needs, reducing real estate footprints and dependence on costly leased space from the private sector. They also contribute to the economy and vitality of downtowns and communities.

Challenges to reuse include such issues as agency preferences, agency requirements, and tenant improvement costs. Some agencies prefer to consolidate in new, larger buildings—which must be purchased, built, or leased—so they may achieve better space utilization rates or enjoy on-site parking. Other agencies simply are unable to achieve savings or space utilization goals in historic buildings, which may require significant or excessive refurbishment to meet safety and seismic codes and other standards.

Recommendations:

- » *The ACHP should convene an inter-agency workgroup to develop success stories and guidance on consolidation and inter-agency collaboration for co-location in federally owned historic buildings and preservation and training for relevant agency personnel.*
- » *The ACHP should work with GSA and the FRPC to explore opportunities to integrate information on “historical status” into FRPP property management tools (<https://www.gsa.gov/policy-regulations/policy/real-property-policy/asset-management/real-property-asset-management-tools>)*
- » *The ACHP should survey property management agencies to identify obstacles to reusing or “outleasing” historic properties, and the inter-agency workgroup should develop recommendations for overcoming those obstacles.*

CONCLUSION

The ACHP is committed to working with its federal and non-federal partners to realize the goals of this EO and to implement the recommendations provided within this report. While the ACHP can take action on many of these recommendations, it encourages those federal agencies who play the primary role in identifying, protecting, and using historic properties under federal ownership to support these improvements and collaborate with the ACHP and other preservation partners in fully implementing historic preservation goals.

The ACHP’s efforts since the issuance of this EO in 2003 in assessing the progress agencies are making in meeting its goals and providing stewardship for historic properties under their control or management demonstrates that the protection of historic properties is vitally important to the federal government and the American people. In every reporting cycle, federal agencies clearly are making progress in integrating historic preservation into their operations. It also demonstrates that the outreach federal agencies do to gather public input and support is vitally important. The successes of these efforts lie in every corner of the United States and its territories, and help tell the story of America.

A photograph showing two individuals in a field setting. One person is kneeling on the left, wearing a light blue shirt and a blue cap, looking down at a wooden box. The other person is kneeling on the right, wearing a white shirt and a brown cap, also looking down at the box. They appear to be conducting an archaeological or field study. The background consists of dry, scrubby vegetation and a clear sky.

APPENDIX

PRELIMINARY PATTERNS AND TRENDS IN ANALYSIS OF FRPP DATA ON HISTORIC PROPERTIES

Eastern New Mexico University
archaeology Field School,
southeastern New Mexico
(photo courtesy BLM)

The Federal Real Property Profile, managed by the Federal Real Property Council, houses information about the nature, use, and extent of the federal government's real property assets. It contains data on all executive branch agency real property assets within and outside the United States, including improvements on federal land, except when otherwise required for reasons of national security, in accordance with EO 13327.

An analysis of FRPP information should clarify the status of many federal historic properties, and to this end the ACHP requested access to information from the FRPP. Such access was supported by the U.S. Government Accountability Office's 2013 Report *Improved Data Needed to Strategically Manage Historic Buildings, Address Multiple Challenges*, which recommended the ACHP's access to this information and underscored the value it may present to efforts to better understand the progress agencies are making in identifying, using, and protecting historic properties under their ownership and control. The ACHP's access was also supported by FRPP staff, at GSA, and by the FRPC member agencies, which promptly responded to the ACHP's request for data from FY14, FY15, and FY16. For security reasons, FRPP data must be requested directly from DoD; the ACHP did so, but DoD was not able to provide the requested information. DoD assets comprise about half of those in the FRPP.

In order to identify broad patterns and trends in managing historic assets, the ACHP analyzed six departments with inventories of greater than 10,000 real property assets: Departments of Agriculture, Energy, Homeland Security, Interior, Transportation, and Veterans Affairs. These departments represent a combined average of approximately 256,000 records per year, or 85 percent of the average 310,000 records provided per year. The following preliminary conclusions are based on ACHP staff analysis of available data:

IDENTIFICATION OF HISTORIC PROPERTIES

- » Historic properties (National Historic Landmarks, NRHP eligible, and NRHP listed assets) comprise less than 10 percent of the federal asset inventory and generally are meeting agency mission needs.
- » During the reporting period, the number of assets agencies have reported as historic (NHL, NRHP-eligible, and NRHP-listed) has increased, from 15 percent in FY14, to 28 percent in FY15, and to 40 percent in FY16. Since FY14 was the first year in which agencies were required to report historical status, and “not evaluated” is the default input in this field, the ACHP believes that most of these newly input historic properties represent improved record-keeping, with a small portion resulting from actual NRHP evaluation efforts within each fiscal year.

PROTECTION OF HISTORIC PROPERTIES

- » Each year, approximately 500 historic assets are considered as “unutilized,” which may mean they are at risk for adverse effects caused by lack of use, deferred maintenance, or potential disposal out of the federal inventory without adequate preservation conditions in place.
- » Further, each year the “status indicator” for approximately 300 federal historic assets notes that they are classified for disposal, excess, or surplus, which may mean they are at risk for adverse effects caused by lack of use, deferred maintenance, or potential disposal out of the federal inventory without adequate preservation conditions in place.
- » The data also indicate that agencies disposed of assets for which the Historical Status is “Not Evaluated.”



Reinstallation of a New Deal Mural, Loop Post Office, Federal Center, Chicago, IL (photo courtesy Caroline Sachay/GSA)

USE OF HISTORIC PROPERTIES

- » The “condition index” for the average federal historic building or structure is equal or better than the average non-historic building or structure. (A condition index is not assigned to a land asset.)
- » Federal historic properties are only considered as slightly more “underutilized” than non-historic federal properties.

The ACHP is pleased to have the opportunity to supplement this report with information from the FRPP, for the first time, and looks forward to continuing to work with FRPP staff and FRPC member agencies. In future triennial reports, the ACHP will request data to supplement the above analyses, to identify patterns and trends, to measure progress in meeting the goals of this EO, and to consider new questions that may arise.

Note: Terms in quotes are defined in the FRPP 2017 Data Dictionary (<https://www.gsa.gov/policy-regulations/policy/real-property-policy/asset-management/federal-real-property-council-frpc/frpc-guidance-library>).



Mission Operations Control Room, Johnson Space Center
Houston 1969 (photo courtesy NASA)

APPENDIX

2

LIST OF AGENCIES REPORTING AGENCY SECTION 3 REPORTS SUBMITTED, 2004-2017

Latte Stones in Guam © Rodrigo Roy Boncato – Fotolia

Executive Branch Department/Agency	2004 base	2005	2008	2011	2014	2017	#
Armed Forces Retirement Home (AFRH)		Y		Y	Y	Y	1
Agriculture, Department of (USDA)	Y						
Agricultural Research Service (ARS)	Y	Y	Y	Y			
Forest Service (FS)	Y	Y					
Farm Services Agency (FSA)	(Y)	Y	Y	*			
Natural Resources Conservation Service (NRCS)	Y	Y	*	*			
Rural Development (RD)							
Commerce, Department of (DOC)			Y	Y			
National Oceanic and Atmospheric Administration (NOAA)	Y	∅	∅	∅		Y	2
National Institute of Standards and Technology *(NIST)						Y	3
Defense, Department of (DOD)	Y		Y		Y	(Y)	4
United States Army Corps of Engineers (COE)				Y	Y	(Y)	5
Education, Department of (DOE)	*	*	*	*			
Energy, Department of (DOE)	Y	Y		Y			
Environmental Protection Agency (EPA)	Y	Y	Y	Y	Y	Y	6
Federal Energy Regulatory Commission (FERC)	Y	Y					
General Services Administration (GSA)	Y	Y	Y	Y	Y	Y	7
Health and Human Services, Department of (HHS)	Y	Y	Y	Y	Y		
Homeland Security, Department of (DHS)	Y	Y	Y	Y	Y	Y	8
Federal Law Enforcement Training Center	Y	∅	∅	∅			

Executive Branch Department/Agency	2004 base	2005	2008	2011	2014	2017	#
Housing and Urban Development, Department of (HUD)	Y						
Interior, Department of the (DOI)							
Bureau of Indian Affairs (BIA)	Y	Y	Y	Y	Y		
Bureau of Land Management (BLM)	Y	Y	Y	Y	(Y)	Y	9
Bureau of Reclamation (Reclamation)	Y		Y	Y	Y	Y	10
Fish and Wildlife Service (FWS)	Y	Y	Y	Y	Y	Y	11
National Park Service (NPS)	Y	Y	Y	Y	Y	(Y)	12
U.S. Geological Survey (USGS)	Y	Y		(Y)	Y	Y	13
International Boundary and Water Commission (IBWC)						Y	14
Justice, Department of (DOJ)	Y	Y	Y	(Y)			
Federal Bureau of Prisons (BOP)	Y	Y	◇	◇	Y	Y	15
Labor, Department of (DOL)	Y	Y	Y	Y		Y	16
National Aeronautics and Space Administration (NASA)	Y	Y	Y	Y	Y	Y	17
National Archives and Records Administration (NARA)	Y	Y					
State, Department of (DOS)	Y						
Surface Transportation Board (STB)	Y						
Tennessee Valley Authority (TVA)	Y			Y	Y	Y	18
Transportation, Department of (DOT)	Y	Y	Y	Y	Y		
Federal Aviation Administration (FAA)	Y	◇	◇	◇	◇	Y	19
Federal Highway Administration (FHWA)	*	*	*	*			
Federal Motor Carrier Safety Administration (FMCSA)	*	*	*	*	*		
Federal Railroad Administration (FRA)	Y	Y	Y	Y	Y		
Maritime Administration (MARAD)			Y	Y	Y	Y	20
Treasury, Department of (TREAS)	Y	Y		Y	Y	Y	21
Bureau of Engraving and Printing (BEP)	Y	Y					
U.S. Postal Service (USPS)	Y	Y	Y	(Y)	Y	Y	22
Veterans Affairs, Department of (VA)	Y	Y	Y	(Y)	(Y)	(Y)	23

Y = Report filed by deadline September 30.

(Y) = Draft or final report filed by publication of Report to 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

3

LINKS TO AGENCY SUBMISSIONS AND ACKNOWLEDGEMENTS

AGENCY SECTION 3 REPORTS SUBMITTED, 2004-2017

<http://www.achp.gov/section3/>

<http://www.achp.gov/section3reports/reportindex.html>

THIS REPORT TO THE PRESIDENT WAS BROUGHT TO YOU BY

Tom McCulloch, Ph.D., R.P.A. | *principal author, assisted by*

Katry Harris

Katharine Kerr

Kirsten Brinker Kulis

Blythe Semmer

Shayla Shrieves

Reid J. Nelson | *Director, Office of Federal Agency Programs*

John M. Fowler | *Executive Director*

Members of the Advisory Council on Historic Preservation

Milton-Madison Bridge, Kentucky and Indiana (photo courtesy Indiana Department of Natural Resources, Division of Historic Preservation & Archaeology)

Opposite: U.S. Courthouse, Erie, PA, subject of a *Learning from Our Legacy* case study (photo courtesy Carol M. Highsmith Photography, Inc./GSA)

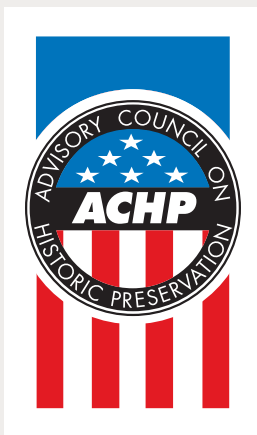
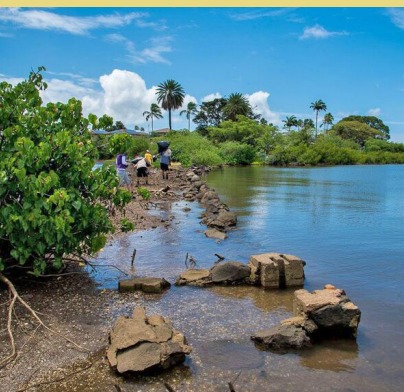


W. L. ...

IN A SPIRIT of STEWARDSHIP

A REPORT ON FEDERAL HISTORIC PROPERTY MANAGEMENT

2018



Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, D.C. 20001-2637
Phone: 202-517-0200

www.achp.gov
www.preserveamerica.gov

Twitter and Instagram: @usachp

Facebook: Preservation-The Next Generation
Preservation Indigenous-Native Youth
ACHP-Advisory Council on Historic Preservation



Top: John Minor U.S. Court of Appeals Building, New Orleans, LA (photo courtesy Carol M. Highsmith Photography, Inc./GSA).
Center L-R: Earth Day restoration of the Loko Paaiau fishpond, at Pearl Harbor, Oahu, HI (photo courtesy U.S. Navy). Graffiti removal at Painted Bluff, Marshall County, AL (photo courtesy TVA). Gavins Point Dam - Tail-waters below Gavins Point Dam on the Missouri River in South Dakota (Shutterstock). Skyline at Bridge of Lions, St. Augustine, FL (SeanPavonePhoto Fotolia)