Preserving America's Heritage

CASE DIGEST:
SECTION 106 IN ACTION

ADVISORY COUNCIL ON HISTORIC PRESERVATION

SPRING 2008

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

John L. Nau, III, of Houston, Texas, is chairman of the 23-member council, which is served by a professional staff with offices in Washington, D.C. For more information about the ACHP, contact:

Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 803
Washington, D.C. 20004
Phone: 202-606-8503
Web site: www.achp.gov

This report is available online at www.achp.gov/casedigest

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Cover: Prehistoric granaries above Nankoweap in Marble Canyon, Grand Canyon National Park
Photo courtesy National Park Service

ABOUT THIS REPORT

Section 106 of the National Historic Preservation Act requires federal agencies to consider historic preservation values when planning their activities. In the Section 106 process, a federal agency must identify affected historic properties, evaluate the proposed action's effects, and then explore ways to avoid or mitigate those effects.

The federal agency often conducts this process with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, representatives of Indian tribes and Native Hawaiian organizations, and other parties with an interest in the issues.

Sometimes a Programmatic Agreement (PA) or a Memorandum of Agreement (MOA) is reached and signed by the project's consulting parties. A PA clarifies roles, responsibilities, and expectations of all parties engaged in large and complex federal projects that may have an effect on a historic property. An MOA specifies the mitigation measures that the lead federal agency must take to ensure the protection of a property's historic values.

Each year thousands of federal undertakings go through Section 106 review. The vast majority of cases are routine and are resolved at the state or tribal level, without the ACHP's involvement. However some cases present issues or challenges that warrant the ACHP's involvement.

This report presents a representative cross-section of undertakings that illustrate the variety and complexity of federal activities that the ACHP is currently engaged in. In addition, the ACHP's Web site www.achp.gov contains a useful library of information about the ACHP, Section 106 review, and the national historic preservation program.

ARIZONA

Project: Ongoing Case: Glen Canyon Dam Project
Agencies: Bureau of Reclamation (lead), United States Geological Survey, National Park Service, Bureau of Indian Affairs, Fish and Wildlife Service
Contact: Nancy Brown nbrown@achp.gov

Glen Canyon and the Grand Canyon are places of tremendous cultural and religious significance to many Indian tribes in the region, and national icons with significant geographic, geologic, and environmental features. Operation of the Glen Canyon Dam affects historic features of both places on an ongoing basis.

Section 106 consultations can be both lengthy and complex, as illustrated by ongoing consultations for the Glen Canyon Dam, the operation of which affects the historic properties of the Glen Canyon and Grand Canyon. The Advisory Council on Historic Preservation (ACHP) initially became involved in the Glen Canyon Dam case during development of a Programmatic Agreement (PA), executed in 1994. That PA was created as an umbrella agreement under which other agreements and plans could be developed to address specific issues.

Glen Canyon and the Grand Canyon are places of great cultural and religious significance to many Indian tribes in the region. Several Indian tribes trace their origins to this area and many others have a special connection to it. Section 1804 of the Grand Canyon Protection Act of 1992 (GCPA) mandates operation of the Glen Canyon Dam in "a manner so as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established," among which are cultural resources. The GCPA mandates long-term monitoring of the effects of the dam operations on cultural and other resources to ensure compliance with the Act. Four Indian tribes have developed monitoring protocols with a focus on traditional ecological knowledge such as plant resources, traditional cultural places, and archaeological sites. The implementation of these protocols is scheduled to begin this year.

Glen Canyon Photo courtesy National Park Service

In the 1996 Record of Decision for operation of the dam, the Secretary of the Interior committed to the institution of a process of stakeholder decision-making and adaptive management. The process, titled the "Glen Canyon Dam Adaptive Management Program" (AMP), was created to guide the operations of the dam. The AMP involves the stakeholder/cooperative agency group called the Adaptive Management Working Group (AMWG), the technical work group (TWG), independent science advisors, and the U.S. Geological Survey (USGS)'s Grand Canyon Research and Monitoring Center. This complex structure brings together representatives from the Bureau of Reclamation (the lead federal agency), USGS, National Park Service (NPS), Bureau of Indian Affairs (BIA), Fish and Wildlife Service, Tribal Historic Preservation Officer (THPO) of the Hualapai Nation, Navajo Nation THPO, other Indian tribes, state agencies, including the Arizona State Historic Preservation Officer (SHPO), utility and environmental interests, and the ACHP.

The parties have been working on the specifics of a Memorandum of Agreement (MOA), which is designed to address mitigation of adverse effects to specific historic properties scheduled to take place each fiscal year. The development of a Historic Preservation Plan is also underway. There is a general consensus that revisions are needed for the original, overarching PA, and in June the consulting parties will meet to begin that process. Since 1994 new parties have become involved in the Section 106 process, including the Western Area Power Administration, BIA, and Colorado River Energy Distributors Association. The new agreement needs to address the roles of AMWG, which had not been created

Glen Canyon Photo courtesy National Park Service

in 1994, and the THPOs, who had since taken on those responsibilities for their tribes. One goal is to improve integration of the work of reclamation with that of NPS, which has its own land-managing and stewardship responsibilities. The ACHP has provided a draft to serve as the basis for the discussion. Updating the PA will present challenges and provide opportunities to improve the agreement based on 13 years of experience.

The Glen Canyon Dam Project is a complex undertaking with ramifications for highly significant historic resources and a wide variety of consulting parties. It is not an undertaking that will be resolved and checked off as completed in months or even years, but it illustrates how some undertakings result in long-term consultations.

DISTRICT OF COLUMBIA

Project: Closed Case: Armed Forces Retirement Home Programmatic Agreement
Agencies: Armed Forces Retirement Home (lead), General Services Administration, National Park Service, National Capital Planning Commission, Commission of Fine Arts
Contact: Katharine R. Kerr kkerr@achp.gov

A Programmatic Agreement has been concluded to guide development and mitigation actions for the richly historic 272 acres that include the United States Soldiers' Home National Historic Landmark and the President Lincoln and Soldiers' Home National Monument.

The Armed Forces Retirement Home (AFRH), an independent establishment within the Executive Branch for the purpose of providing residences and related services for certain retired and former members of the United States Armed Forces, developed a Master Plan for the management of the Washington, D.C. campus (272 acres) to include the rehabilitation and renovation of existing buildings and construction of a mixed-use redevelopment of approximately 4.5 million square feet on the southeast corner of the property, in addition to future development in the southern portion of the property.

A Programmatic Agreement was executed among the AFRH, District of Columbia State Historic Preservation Officer (SHPO), National Capital Planning Commission, National Park Service, and the Advisory Council on Historic Preservation in March 2008.

The agreement focuses on those issues that could not immediately be addressed through consultation including specific mitigation actions that will be undertaken by AFRH, and subsequent developers for assigned portions of the property, addressing the direct and indirect impacts of rehabilitation and development on the Washington campus historic properties. It also outlines a process for future Section 106 project review

Zone map of the Armed Forces Retirement Home

in order to reduce review redundancy for federally and non-federally (by private development on the property) funded projects.

The development of this agreement was enhanced through the commitment of AFRH and consulting parties to the Section 106 process. A prime example of the success of this Section 106 consultation was when the preferred developer for Zone A, Crescent Development, LLC, immediately began adapting its development plans for Zone A based on the issues and concerns raised by consulting parties after it became an active participant in the Section 106 process. (For example, the historic viewshed corridor from the Scott Statue to the Capitol was of great concern to consulting parties. Crescent shifted building height and bulk to the west of the viewshed corridor, lessening the impact new construction would have on the historic view.)

AFRH also agreed to a clause in the preamble of the agreement that addressed the concerns many stakeholders had in the proposed development of Zone C by pledging AFRH's readiness to consider the sale or lease of Zone C for open space if an appropriate opportunity arose. Through consultation, interested parties could see how suggestions and concerns were addressed by AFRH as the process progressed through initiation, identification, assessment, and resolution. This undertaking could be used as a model of how the Section 106 process can, and should, be used as a planning tool for federal agencies in understanding project impacts to historic properties.

In addition to federal agencies and the SHPO, other

Aerial view of the Armed Forces Retirement Home

involved parties represented the following: Advisory Neighborhood Council 1A; Advisory Neighborhood Council 4C; Advisory Neighborhood Council 4D; Advisory Neighborhood Council 5C; the Catholic University of America; Committee of 100 on the Federal City; Crescent Resources, LLC; District of Columbia Office of Planning; DC Preservation League; Military Officers Association of America; National Trust for Historic Preservation; Petworth and Columbia Heights Residents Concerned; Rock Creek Cemetery Association; St. Paul's Episcopal Church; United Neighborhood Coalition; Ward 1 Councilmember; Ward 4 Councilmember; Ward 5 Councilmember; United States Soldiers' Home National Historic Landmark; and the President Lincoln and Soldiers' Home National Monument.

The following are included on the National Register of Historic Places:

- United States Soldiers' Home National Historic Landmark (Buildings 1, 2, 12, and 14 only), listed 1973
- President Lincoln and Soldiers' Home National Monument (a 2.27 acre rectangular area including Buildings 11, 12, and 13), designated 2000
- Armed Forces Retirement Home—Washington Historic District

The AFRH, formerly known as the U.S. Soldiers' and Airmen's Home, was one of the first retirement homes established exclusively for the military in 1851. It remains one of the oldest continuously operating retirement facilities for military personnel. President Abraham Lincoln and his family stayed at the AFRH between 1861 and 1864 as a seasonal retreat. Presidents including James Buchanan, Rutherford Hayes, James Garfield, and Chester Arthur also followed this practice.

For more information: www.afrhdevelopment.com
www.afrh.gov

Footnote: Lincoln Cottage is now open to public

While separate from the Section 106 issues outlined here, it is worth noting that the Lincoln Cottage which is located on the Armed Forces Retirement Home grounds is now open on a prearranged basis for visitation through an innovative program arranged and managed by the National Trust for Historic Preservation (National Trust).

This house was occupied by President Abraham Lincoln and his family on a seasonal basis for many months during the Civil War years, offering what the family obviously found a more comfortable setting during the summer and fall Washington weather than the White House afforded. The site recently completed an extensive $15 million renovation.

The area that can be publicly accessed also includes a visitor center, of which the National Trust Web site dedicated to the Lincoln Cottage notes the following:
"Robert H. Smith Visitor Education Center
The Visitor Education Center offers exhibits that bring to life the history of the Soldiers' Home, wartime Washington, and President Lincoln's extraordinary leadership skills. A special exhibition gallery presents rotating displays of objects related to Lincoln and his legacy. In "Lincoln's Cabinet Room," visitors can participate in an innovative interactive experience exploring Lincoln's Toughest Decisions related to emancipation, politics, and military affairs.
Entrance (to visitor center) available through guided tour only."
For more information: www.lincolncottage.org

DISTRICT OF COLUMBIA

Project: New Case: Martin Luther King, Jr. National Memorial
Agencies: National Park Service (lead), National Capital Planning Commission
Contact: Martha Catlin mcatlin@achp.gov

Construction of a new memorial to Martin Luther King, Jr. is imminent. It will be located on the Tidal Basin in West Potomac Park to the north of the Franklin D. Roosevelt Memorial, and centrally positioned at water's edge in line with the Lincoln and Jefferson memorials. The project is authorized by Public Law 104-333, Section 508 (November 1996) and is subject to requirements of the Commemorative Works Act. However, site selection was complete before the Section 106 consultative process on the design of the memorial began in March 2008.

Once authorizing legislation was enacted in 1996, the Martin Luther King, Jr. Memorial Foundation (Foundation), the memorial sponsor, began working with the National Park Service (NPS) and others to plan the memorial. NPS is typically the lead federal agency with Section 106 responsibility for memorial projects in the Monumental Core of the nation's capital, and is the owner and operator of such memorials once they are constructed with funds raised privately by a memorial foundation. NPS chairs the National Capital Memorial Advisory Commission (NCMAC), whose role is to advise the Foundation and other memorial foundations on site selection and related matters. The National Capital Planning Commission (NCPC) holds approval authority for the memorial. Both NCPC and the Commission of Fine Arts (CFA) serve as members of the NCMAC as well as Section 106 consulting parties.

With the NCMAC, the Foundation considered several potential sites and ultimately put forward as its preferred location a prominent site on the Tidal Basin that its members believed would properly reflect the exceptional significance of King's legacy. Once the Tidal Basin site was selected for the new memorial, the Foundation began developing concept designs intended to achieve the memorial's unique purpose while also addressing the special characteristics and sensitivities of the site.

Aerial view of the National Mall looking east. The site where the Martin Luther King, Jr. memorial will be constructed is outlined in red. Image courtesy Martin Luther King, Jr. Memorial Foundation

The goal of the Section 106 consultation process for the memorial is to help ensure it will be compatible with the historic landscape character of its Tidal Basin site. It will also be responsive to input from the CFA, NCPC, the District of Columbia State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and several other consulting parties that will bring discernment and expertise to the design's continued development. Although NPS had coordinated with the ACHP and others for informational purposes in December 1999, it was March 2008 before NPS began the formal process of notifying the ACHP and considering alternatives to avoid, minimize, or mitigate potential adverse effects of the proposal.

A March 3 consultation meeting provided an opportunity for participants to become familiar with current plans for the proposal and to begin discussions with the Foundation and NPS. Attendees included, in addition to the NPS and the ACHP, representatives of the following organizations: the Foundation, District of Columbia SHPO, National Trust for Historic Preservation, National Coalition to Save Our Mall, NCPC, and CFA.

The consulting parties identified specific questions and issues pertaining to proposed materials, vegetation

and other landscape components, iconography and sculptural elements, the overall message to be conveyed through quotations and symbolism, and the relationship of the memorial to its surroundings.

The parties appreciated that the design of the memorial had improved considerably since earlier designs had been publicized in the media. In particular, the angular and extreme lines of earlier concepts have been reconfigured as a more curvilinear design. However, concerns about the scale of the memorial have not been fully addressed. The consulting parties did not feel prepared to critique the design without additional information about how and why it had evolved into the current proposal. Therefore, much of the March 3 discussion focused on the "Visitor Comfort Station/ Bookstore," which the group began to collectively rethink in order to improve its compatibility with the memorial's setting and context.

Several consulting parties found the comfort station/ bookstore building, as currently designed, too monumental in character for an ancillary facility, and suggestions were made regarding alternate approaches to its design, including the possibility of a green (sustainable) design that would differentiate the building from the commemorative purpose of the memorial itself. It was acknowledged that the building's function also needed better development before its design could be adequately addressed. The Foundation and NPS appeared to be receptive to the ACHP's request that alternatives to the proposed design and location of the visitor comfort station be developed and studied in response to the discussion.

ACHP staff also requested that NPS assemble documentation to address the evolution of the design of the site, the memorial, and the visitor comfort station. This was considered necessary to inform consulting parties about the rationale for changes that had been incorporated into the currently proposed design, as well as to create a public record of the lengthy time period over which the design has developed. Consulting parties agreed that additional documentation was needed, to include the following: a design chronology, a site analysis, an effects analysis, a circulation plan, and National Register documentation for the Tidal Basin and West Potomac Park. NPS agreed to provide all of the requested items to consulting parties and is convening a second consultation meeting for the memorial proposal on April 22, 2008.

For further information: www.mlkmemorial.org

ILLINOIS

Project: Closed Case: Shawnee National Forest and Midewin National Tallgrass Prairie Programmatic Agreement for Prescribed Burning
Agencies: Forest Service, United States Department of Agriculture
Contact: Matt Thomas mthomas@achp.gov

Illinois is the fourth most populous state in the United States, and 24th largest in size, yet ranks only 48th in the amount of public land it contains. Two important natural areas open to the public, the Shawnee National Forest and the Midewin National Tallgrass Prairie, have been at the forefront nationally in finding a process to appropriately streamline the Section 106 process in the important environmental effort of prescribed burning.

The Shawnee National Forest and the Midewin National Tallgrass Prairie in Illinois have developed a Programmatic Agreement (PA) to streamline Section 106 compliance for a program of prescribed burning. The burning program is designed to set controlled fires on hundreds of acres of Forest Service lands to reduce hazardous fuels and promote the growth of desirable vegetation. The burning program covers hundreds to thousands of acres annually and has the potential to adversely affect historic properties.

The PA provides a streamlined approach to the standard Section 106 process. The process established in the PA will enable the Forest Service to reduce the cost and time associated with conducting Section 106 consultation and identification efforts on land areas of these sizes.

Specifically, the agreement allows the Forest Service, during the implementation of its prescribed burning program, to consolidate the initial steps (identification, evaluation, and assessment of effects) of the Section 106 process without consulting with the State Historic Preservation Officer (SHPO) on a case-by-case basis. The agreement also establishes a series of standard treatments which, if employed, will permit the Forest Service units involved to have a no adverse effect determination and not require case-by-case consultation. The agreement establishes how the forest will use the

Prescribed burns are a management tool in the effort to prevent runaway wildfires and improve the forest ecology. Photo courtesy Shawnee National Forest

National Environmental Policy Act process, and other means as necessary, to facilitate public participation and the identification of consulting parties. The agreement also establishes a program of submitting annual reports to the SHPO and consulting tribes.

In understanding this PA's importance, it is appropriate to consider the importance of the resources involved. The Midewin National Tallgrass Prairie was established in 1996 and is the first national tallgrass prairie in the country. Part of the former Joliet Army Ammunition Plant, the area given to public stewardship now covers 15,454 acres.

The Shawnee National Forest includes 277,506 acres, of which only a third is national forest system land. However, considering the low percentage of public land available within Illinois, it is impressive to note the Shawnee contains seven congressionally-designated Wilderness Areas, one additional area recommended for wilderness study, six candidates for designation as Wild and Scenic Rivers, four National Natural Landmarks, 10 Research Natural Areas, and more than 80 other designated Natural Areas considered important for botanical, ecological, geological, or zoological reasons. It is the single largest publicly owned body of land in the state.

The Illinois SHPO and the Advisory Council on Historic Preservation were the consulting parties. The PA was signed in March 2008. For more information: www.fs.fed.us/r9/forests/shawnee and www.fs.fed.us/mntp

LOUISIANA

Project: New Case: Demolition and Replacement of State Office Building and State Office Building Annex in New Orleans
Agencies: Federal Emergency Management Agency, Department of Homeland Security
Contact: Jeff Durbin jdurbin@achp.gov

The state of Louisiana plans to demolish two state office buildings in New Orleans. Both buildings were constructed in 1958 and are individually eligible for listing in the National Register of Historic Places but were damaged by Hurricane Katrina. Federal Emergency Management Agency (FEMA) funds will be used to fund the demolition of the two buildings and the construction of a new office building on the same site. FEMA is currently consulting on a Memorandum of Agreement to address the adverse effects the undertaking will have to historic properties.

The Federal Emergency Management Agency (FEMA) proposes to provide Public Assistance Funds to the Louisiana Division of Administration, Facilities Planning and Control (FP&C) for its demolition of the State Office Building and State Office Building Annex, and FP&C's construction of a new State Office Building in New Orleans. Both of the existing buildings are located on Loyola Avenue, adjacent to the New Orleans City Hall and the Main Public Library, which surround Duncan Plaza. Both buildings are examples of International-style architecture, and the State Office Building Annex originally served as the Louisiana Supreme Court Building. FEMA has determined in consultation with the Louisiana State Historic Preservation Officer (SHPO) that both the State Office Building and the State Office Building Annex are individually eligible for listing in the National Register of Historic Places.

The buildings were damaged by the 2005 Hurricane Katrina, which led to FP&C's decision to demolish both buildings and replace them with a single building. FEMA proposes to fund demolition as well as the construction of the new facility. FEMA is consulting with the Louisiana SHPO; the Advisory Council on Historic Preservation (ACHP); FP&C; National Trust for Historic Preservation; and the New Orleans Chapter of the International Working Party for Documentation and Conservation of Buildings, Sites and Neighborhoods of the Modern Movement (DOCOMOMO) on a Memorandum of Agreement (MOA), which will address the adverse effects of the proposed undertaking.

The Lousiana State Office Building Annex is the second of two 1958 structures that will be demolished to make way for a new structure. Photo courtesy Louisiana State Historic Preservation Office

In mid-April, the draft MOA included the following:

- a range of proposed treatment measures to mitigate adverse effects, including recordation of the two historic buildings proposed for demolition, and the salvage and reuse of historic building materials such as the Annex's exterior granite steps;
- the removal and conservation of a mosaic mural by artist Conrad Albrizio, which will be installed in the new building;
- design review of the proposed State Office Building;
- a process for addressing the inadvertent discovery of human remains including FEMA's notification of Indian tribes about such discoveries; and,
- measures to protect any archaeological resources that may lie beneath Duncan Plaza during the demolition and construction phases of work.

ACHP staff has been involved in consultation for this undertaking since December 2007. FEMA's first consultation meeting about the undertaking took place December 12, 2007. Consultation meetings have continued during January, February, and March 2008. It is anticipated the MOA will be ready for signing in late April 2008. For more information: www.crt.state.la.us/culturalassets/fema106/readnotice.asp?NoticeID=87

MINNESOTA

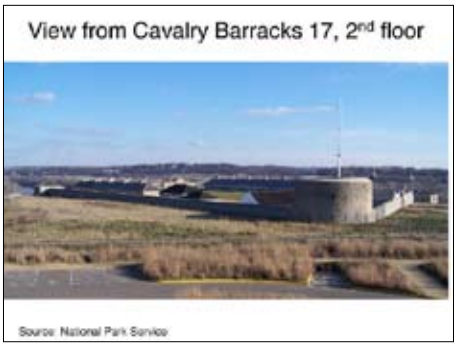
Project: New Case: Amendment of Preservation Agreement for Historic Fort Snelling, a National Historic Landmark Site
Agencies: National Park Service
Contact: John Eddins jeddins@achp.gov

Proposed changes to the physical facilities and operations at Historic Fort Snelling by the Minnesota Historical Society require National Park Service review and approval of changes to a Program of Preservation and Utilization that controls use of the property.

The Minnesota Historical Society (MHS) is proposing a revitalization program for Historic Fort Snelling, a National Historic Landmark, in Hennepin County, Minnesota. The fort is a 22-acre National Register-listed historic district that lies within the boundaries of the Mississippi National River and Recreation Area (MNRRA), a unit of the National Park Service (NPS). The site was transferred from the NPS to the MHS in 1969 through a deed transfer under the federal Historic Monuments Program. The General Services Administration (GSA) attached a Program of Preservation and Utilization (PPU) to the deed, to "protect, preserve, and enhance" the historic character of the property. Any modifications to the PPU must be agreed to by both the NPS and MHS.

The federal action in this case is review of an amendment to the PPU necessitated by the proposed revitalization plan which currently includes the following:

- Demolition of the existing visitor center and construction of a new visitor center;
- Stabilization and rehabilitation of existing historic structures including Buildings 17, 18, 22, and 30 and research into plans for reuse;
- Modifications to two existing buildings, the Long Barracks and the Officer's Quarters, within the walls of the historic fort;
- Development of a new interpretive plan within a comprehensive interpretive planning process;
- Landscaping associated with the construction of the new visitor center and as a component of a phased, master plan coordinated with the developing interpretive plan; and,



Historic Fort Snelling faces structural and operational changes to address flagging visitation. Photo courtesy National Park Service

- Archaeological research to identify and evaluate archaeological resources that may be encountered.

While MHS initially planned to rehabilitate and reuse historic Buildings 17 and 18 as a new visitor center, in June 2007 MHS concluded that construction of a new visitor center would be the most viable option given budgetary constraints and the existing condition of these buildings. MHS feels a new visitor center is needed to re-establish the site as a focus for visitation, which has been steadily declining.

The Section 106 consultation for this undertaking is complicated by the fact that MNRRA is reviewing the proposed amendment to the PPU not only in the light of the Section 106 process but also as a representative of the NPS for the National Historic Landmark Program, the Historic Monuments Program, and in terms of how it adheres to MNRRA's Comprehensive Management Plan and to National Park Service Policies. In correspondence with the consulting parties, the Advisory Council on Historic Preservation has observed that the Section 106 process for resolving adverse effects may be different from the internal review used by MNRRA/NPS to determine whether to approve MHS's request for an amendment to the PPU. Consulting parties in the Section 106 review include the National Trust for Historic Preservation and several local groups concerned with the preservation of the fort.

The Section 106 review for the amendment to the PPU was recently put on hold while MHS and MNRRA sort out the appropriate parameters of MNRRA's internal review process as it relates to

the Section 106 review. In the late spring or early summer 2008, MNRRA will post background information about the undertaking and the Section 106 process on its Web site to enable public review. MNRRA will then schedule and host a public meeting in order to elicit public concerns and comments about the proposed undertaking. During this period, MNRRA will also continue its active outreach to the tribes and other important stakeholders. A summary will be prepared of all outreach efforts to stakeholders and the public to identify major issues related to MHS's revitalization proposal. Consulting parties will participate in a teleconference, date to be determined, to discuss this summary and to clarify next steps that will be taken to resolve adverse effects.

For more information: www.nps.gov/miss
www.mnhs.org/places/sites/hfs

Preserving America's Heritage

ADVISORY COUNCIL ON HISTORIC PRESERVATION
1100 Pennsylvania Avenue NW, Suite 803 · Washington, DC 20004
Phone: 202-606-8503 · Fax: 202-606-8647 · achp@achp.gov · www.achp.gov