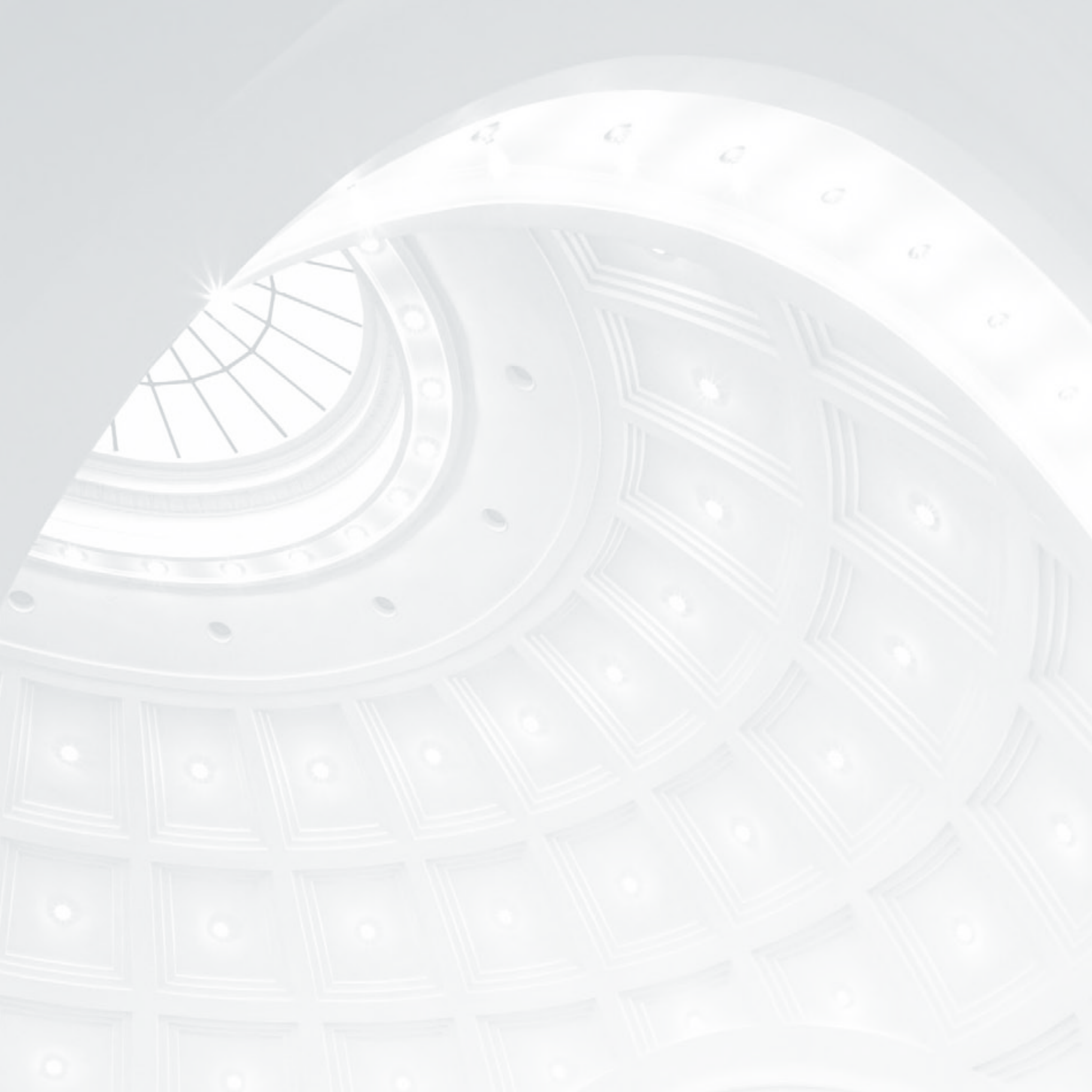


EXTENDING THE LEGACY

GSA HISTORIC BUILDING STEWARDSHIP | 2008



PREFACE

THE DECADE SINCE THE CENTER FOR HISTORIC BUILDINGS ISSUED ITS FIRST MAJOR PUBLICATION, *HELD IN PUBLIC TRUST: PBS STRATEGY FOR USING HISTORIC BUILDINGS*, HAS BEEN A WATERSHED PERIOD OF STEWARDSHIP ACHIEVEMENT FOR GSA. DURING THIS TIME, GSA HAS FIRMLY ESTABLISHED ITSELF IN THE FOREFRONT OF THE PRESERVATION PROFESSION, GAINING RECOGNITION FOR THE POLICIES AND MODEL PRACTICES THAT MAKE PRESERVATION INTEGRAL TO OUR BUSINESS.

GSA GREETED THE MILLENNIUM WITH *GSA HISTORIC BUILDING LEASING*, A BREAKTHROUGH REPORT EXAMINING HOW GSA IS SUPPORTING THE REUSE OF HISTORIC BUILDINGS NATIONWIDE IN LARGE AND SMALL LEASE ACQUISITIONS, WITH SOLUTIONS FOR TAILORING TENANT SPACE REQUIREMENTS AND MARKETING TO PROMOTE AGENCY LOCATION IN HISTORIC BUILDINGS AND DISTRICTS. A YEAR LATER, THE CENTER RELEASED A SIX-VOLUME *PRESERVATION DESK GUIDE* FEATURING DOZENS OF MODEL GSA DOCUMENTS CREATED TO MEET PRESERVATION RESPONSIBILITIES ASSOCIATED WITH OUR ACTIVITIES INVOLVING HISTORIC BUILDINGS. GSA'S 2002 *LEGACY VISION* TOOK THE STRATEGY OUTLINED IN *HELD IN PUBLIC TRUST* A STEP FURTHER TO PROMOTE FISCALLY PRUDENT USE OF OUR HISTORIC BUILDINGS BY ESTABLISHING ARCHITECTURAL MERIT-BASED STEWARDSHIP PRIORITIES AND OUTLINING SPECIFIC FINANCIAL TURNAROUND MEASURES FOR HISTORIC BUILDINGS THAT ARE NOT PERFORMING WELL.

GSA'S NATIONAL PRESERVATION POLICY, *ADM 1020.2 PROCEDURES FOR HISTORIC PROPERTIES*, ISSUED IN 2003, OFFERED GUIDANCE TO INTEGRATE SECTIONS 106 AND 110 INTO GSA'S DAILY BUSINESS, HELPING ASSOCIATES KEEP HISTORIC BUILDINGS OCCUPIED AND GENERATING REVENUE TO SUPPORT THEIR LONG-TERM MAINTENANCE, REPAIR, AND CAPITAL INVESTMENT NEEDS. THE CENTER'S GROUND-BREAKING STUDY *GROWTH, EFFICIENCY AND MODERNISM: GSA BUILDINGS OF THE 1950s, 60s AND 70s*, ALSO RELEASED IN 2003, EXAMINED OUR POORLY UNDERSTOOD MODERN FEDERAL OFFICE BUILDINGS WITHIN THE CONTEXT OF THEIR TIME, WITH SPECIFIC GUIDANCE FOR ASSESSING NATIONAL REGISTER ELIGIBILITY AND CASE STUDIES ILLUSTRATING SUCCESSFUL SOLUTIONS TO THE UNIQUE PRESERVATION CHALLENGES BUILDINGS OF THIS ERA PRESENT.

GSA TOOK A SECOND OPPORTUNITY TO COMPREHENSIVELY EXAMINE ITS NATIONWIDE STEWARDSHIP TRACK RECORD IN 2005 WITH THE PUBLICATION OF *EXTENDING THE LEGACY: GSA HISTORIC BUILDING STEWARDSHIP*. THE REPORT AFFIRMED IMPRESSIVE STEWARDSHIP ACHIEVEMENTS IN EACH PUBLIC BUILDINGS SERVICE (PBS) BUSINESS AREA AND A CONTINUED NEED TO PROMOTE THE LEGACY VISION GOAL OF PUTTING HISTORIC BUILDINGS FIRST IN CRAFTING SPACE ACQUISITION, INVESTMENT, AND DISPOSAL STRATEGIES. IT ALSO UNDERScoreD THE VALUE OF ONLINE RESOURCES, SUCH AS THE KEY WORD SEARCHABLE VERSION OF THE *PRESERVATION DESK GUIDE*, LAUNCHED IN 2004, THAT HELP GSA ASSOCIATES MEET AGENCY STEWARDSHIP RESPONSIBILITIES SUCCESSFULLY WITH LESS EFFORT.

COLLATERAL REWARDS FOR THESE EFFORTS INCLUDE THE BENEFITS SUCCESSFUL GSA APPROACHES OFFER OTHER ORGANIZATIONS FACING SIMILAR STEWARDSHIP CHALLENGES. FEDERAL AND INTERNATIONAL AGENCIES ARE TURNING TO US FOR GUIDANCE, NOT ONLY ON PRESERVATION POLICY AND PRACTICE, BUT ALSO ON ACHIEVING THE BROADER VISION OF WELL-INTEGRATED CHANGE. WE ARE PROUD TO HAVE BEEN SOUGHT OUT BY GOVERNMENT AGENCIES AND HERITAGE ORGANIZATIONS IN CANADA, MEXICO, IRELAND, AND THE SOVIET UNION, AS WELL AS THE DEPARTMENT OF STATE, FOR GUIDANCE ON MANAGING A GEOGRAPHICALLY DIVERSE HISTORIC BUILDING INVENTORY IN A FISCALLY CONSTRAINED STEWARDSHIP ENVIRONMENT.

GSA'S TECHNICAL PRESERVATION EXPERTISE IS ACTIVELY SOUGHT IN PROFESSIONAL CONFERENCE VENUES AND BY PRIVATE ARCHITECTS AND OTHER GOVERNMENT AGENCIES. WE ARE HONORED TO HAVE RECEIVED INTERNATIONAL RECOGNITION FOR OUR STEWARDSHIP POLICIES AND PROCESSES IN AWARDS FROM THE ASSOCIATION FOR PRESERVATION TECHNOLOGY INTERNATIONAL, THE NATIONAL TRUST FOR HISTORIC PRESERVATION, THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND THE AMERICAN INSTITUTE OF ARCHITECTS, AS WELL AS STATEWIDE PRESERVATION ORGANIZATIONS AND TRADE ASSOCIATIONS.

OUR MODEL PRESERVATION CONTRACT QUALIFICATION REQUIREMENTS, TECHNICAL SPECIFICATIONS, DESIGN SOLUTIONS, COMPLIANCE CHECKLISTS, AND PRESERVATION REPORT SUBMISSION STANDARDS ARE BENEFITING STATE, LOCAL, AND PRIVATE SECTOR PROJECTS AS WELL AS GSA REGIONAL PROJECT TEAMS. IN 2004, GSA'S PERIMETER SECURITY "KIT OF PARTS" PROTOTYPE GENERATED NATIONWIDE INTEREST AMONG DESIGN PROFESSIONALS SINCE RESULTS OF THE CENTER STUDY *PERIMETER SECURITY FOR HISTORIC BUILDINGS* APPEARED IN PROFESSIONAL JOURNALS, TRADE MAGAZINES, AND MCGRAW HILL'S 2004 *BUILDING SECURITY: HANDBOOK FOR ARCHITECTURAL PLANNING AND DESIGN*. IN 2009, GSA'S CENTER FOR HISTORIC BUILDINGS WILL RELEASE A NEW LOBBY SECURITY DESIGN GUIDE FOR HISTORIC BUILDINGS. THE GUIDE EXAMINES A VARIETY OF HISTORIC BUILDING LOBBY SIZES AND CONFIGURATIONS, WITH ILLUSTRATED CASE STUDIES AND LAYOUT GUIDANCE, FOR SUCCESSFULLY INTEGRATING SECURITY PROCESSING INTO HISTORIC BUILDING ENTRY AREAS.

SINCE ITS INCEPTION, THE CENTER HAS ENERGETICALLY WORKED TO IMPROVE THE BODY OF ONLINE PRESERVATION RESOURCES AVAILABLE TO GSA ASSOCIATES NATIONWIDE, WITH ONLINE VERSIONS OF ALL PUBLICATIONS AND GUIDANCE, ALONG WITH A WIDE RANGE OF TEMPLATES AND MODEL DOCUMENTS AVAILABLE BY BUSINESS FUNCTION SUBJECT MENUS OR SEARCHABLE DATABASES SUCH AS THE ONLINE

DESK GUIDE. A SUBSTANTIAL BODY OF BUILDING DOCUMENTATION IS NOW AVAILABLE IN HIGH-QUALITY POSTERS, BROCHURES, AND FILMS TO RAISE AWARENESS AMONG GSA ASSOCIATES, TENANTS, AND THE PUBLIC. ALL OF THESE MATERIALS ARE AVAILABLE IN PRINT OR ONLINE.

IN THIS YEAR'S *EXTENDING THE LEGACY* UPDATE, WE ARE PROUD TO REPORT SUCCESSES IN ALL AREAS OF GSA ACTIVITY AFFECTING HISTORIC BUILDINGS, ALONG WITH NEW PUBLICATIONS AND INITIATIVES THAT ARE ALREADY BRINGING RESULTS. GSA'S 2008 GUIDANCE PUBLICATION, *NATIONAL HISTORIC PRESERVATION ACT SECTION 106 GUIDANCE FOR THE DISPOSAL OF HISTORIC PROPERTY*, OUTLINES AN ARRAY OF AUTHORITIES AND INNOVATIVE APPROACHES FOR MEETING FEDERAL STEWARDSHIP GOALS AND GSA INTERESTS. THE GUIDE INCLUDES A LARGE SELECTION OF ANNOTATED SAMPLE DOCUMENTS DEVELOPED BY GSA PRESERVATION AND DISPOSAL TEAMS, DETAILING HOW TO CARRY OUT EACH APPROACH SUCCESSFULLY. OUR TEN-YEAR MODERN-ERA BUILDINGS INITIATIVE HAS EARNED NATIONAL ATTENTION AS A MODEL FOR BROAD-BASED POLICY THAT TOUCHES ON ALL ASPECTS OF HISTORIC BUILDING INVENTORY MANAGEMENT.

NO SUCCESS OCCURS IN A VACUUM. OUR STEWARDSHIP ACHIEVEMENTS DEPEND ON THE EFFORTS OF FRONT-LINE REGIONAL ASSOCIATES; CONTRACT ARCHITECTS, ENGINEERS, AND CONSTRUCTION FIRMS WHO TURN AGENCY HOUSING PLANS INTO PHYSICAL SPACE IN NEW OR EXISTING BUILDINGS; AND AGENCY LEADERSHIP. GSA'S REGIONAL AND ASSISTANT REGIONAL ADMINISTRATORS, PORTFOLIO DIRECTORS, PROPERTY DEVELOPMENT DIRECTORS, AND REGIONAL COUNSEL HAVE PROVEN GREAT SUPPORTERS OF AGENCY INITIATIVES THAT FAVOR HISTORIC BUILDING REUSE AND HISTORIC COMMUNITIES.

AMONG THE ORGANIZATIONAL ADVANTAGES THAT HAVE HELPED TO MAKE GSA'S SUBSTANTIAL STEWARDSHIP ACHIEVEMENTS POSSIBLE IS A CULTURE OF CONSCIENTIOUS PRAGMATISM FOSTERED BY PUBLIC-SPIRITED, YET BUSINESS-MINDED, NATIONAL LEADERSHIP. THIS CULTURE ALSO SUPPORTS AN ACTIVE EXCHANGE OF KNOWLEDGE, INTERDISCIPLINARY COLLABORATION, AND EXPERTISE THAT TRAVELS FROM THE BOTTOM UP, AS WELL AS FROM THE TOP DOWN. IN THIS ENVIRONMENT, EXTRAORDINARY STEWARDSHIP ACHIEVEMENTS CAN BECOME ROUTINE BUSINESS.



Rolando Rivas-Camp, FAIA
Director, Center for Historic Buildings

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SUPPLEMENT A HISTORIC FEDERAL COURTHOUSE WITH
NONFEDERAL HISTORIC BUILDINGS AND NEW CONSTRUCTION

S U C C E S S S T O R Y

**U.S. COURTHOUSE ANNEX
ERIE, PENNSYLVANIA**

FOR EXPANSION OF THE FEDERAL COURTHOUSE
IN ERIE, GSA ACQUIRED UNDERUTILIZED
HISTORIC PROPERTIES — A BEAUX ARTS
MUNICIPAL LIBRARY AND A FORMER ART
MODERNE CLOTHING STORE NOW SUPPLEMENT
GSA'S 1930S ART DECO COURTHOUSE.
THE THREE STRUCTURES ARE LINKED BY
A CONTEMPORARY ADDITION THAT SERVES
AS A GATEWAY. COMBINING OLD AND NEW
STRUCTURES DOUBLED THE AMOUNT OF
OCCUPIABLE SPACE, NOT ONLY ENABLING
THE SITE TO MEET THE COURTS'
REQUIREMENTS, BUT ALSO REVITALIZING
THE HISTORIC DOWNTOWN.

U.S. COURTHOUSE
ERIE, PA
LIBRARY, 1897
FEDERAL BUILDING, 1938
BAKER BUILDING, 1947
ANNEX, 2004





EXECUTIVE SUMMARY

This update to U.S. General Services Administration's (GSA) 2004 stewardship report details new initiatives and progress on continuing programs that affect historic buildings or may offer opportunities for accomplishing federal preservation goals. Despite continuing financial constraints, all GSA business areas merit recognition for noteworthy achievements in support of National Historic Preservation Act and Executive Order 13287 *Preserve America* goals. Implementation of GSA's inventory restructuring between 2002 and 2006 pared close to 15 percent of the historic building inventory—principally small, monumental buildings located in towns facing a declining federal presence or cities where a new larger federal building eliminated continued need for the old one. Through billing corrections, building improvements, return on investment rents, tenant relocations, and other intervention measures, GSA asset management teams also moved dozens of underperforming or nonperforming historic buildings to a performing status. GSA successes improving the performance of financially troubled Legacy buildings show the positive impact that strategic investment can have on the viability of our most significant buildings.

Major achievements of the 2005–2008 reporting period include

National Register Nominations: a multiyear Section 110 compliance initiative is using economies of scale to accelerate nomination of eligible properties to the National Register of Historic Places.

Historic Property Disposal Guidance: New GSA guidance on disposal of historic property provides disposal specialists with innovative approaches and sample documents addressing most major challenges that arise in GSA historic property disposals.

Modernism Initiative: GSA's ten-year Modern-Era Buildings Initiative is being widely recognized as a comprehensive model for conceiving and implementing policy on issues of national importance.

Lobby Security Design Guide: New guidance on integrating security screening equipment into historic building lobbies will reduce the adverse impact of keeping historic properties safe.

Improved Section 106 Compliance: GSA's liaison position at the Advisory Council on Historic Preservation (ACHP) provides dedicated staff for GSA project review and support, greatly reducing project delays by helping to accurately gauge community interest in a project or appropriate response strategies.

Public Access to Architectural Photographs: Through a cooperative agreement with the Library of Congress, high-quality architectural photographs that the Center for Historic Building procures for its brochures, posters, and educational publications are now available to the public online at no charge on the library's Prints and Photographs Web page.

Interpretation: In 2008, GSA won its first Preserve America Presidential Award for its role in the preservation and interpretation of the African Burial Ground uncovered during construction of GSA's federal office building at 290 Broadway in lower Manhattan.

This *Extending the Legacy* update will be submitted to the ACHP in September 2008 in fulfillment of GSA's responsibility for triennial reporting on the condition, preservation, and use of GSA's historic buildings.

INTRODUCTION

GSA's stewardship philosophy is grounded in the National Historic Preservation Act (NHPA) of 1966. The NHPA requires federal agencies to use and preserve historic buildings and to cooperate with states, local governments, and private entities to promote preservation.

The provision most familiar to GSA associates is the project review process established under Section 106 of the NHPA, requiring federal agencies to take into account the effects of their activities on historic buildings and to avoid adversely affecting the qualities that make them significant. A principal role of GSA's Regional Historic Preservation Officers (RHPOs) is to guide Public Building Service (PBS) associates through the Section 106 compliance process to ensure that review agencies and interested parties are given a reasonable opportunity to comment on GSA actions before decisions are made.

Because Section 106 review is the NHPA process most commonly triggered by GSA's day-to-day activity, some GSA staff and tenants have grown to regard Section 106 as synonymous with the NHPA. But GSA cannot fully comply with the NHPA by simply doing no harm to historic properties. The act calls upon the federal government to be a leader, actively using and preserving historic buildings, setting an example for local governments and the American public. GSA has an impressive record of using innovative approaches that allow historic buildings to be adapted for new uses or that solve complex preservation design problems without compromising historically significant materials and spaces. The larger purpose of this report is to promote a broader and more meaningful understanding of GSA stewardship to maximize the opportunities we have to do good in the course of our daily business.

The most significant regulatory action affecting federal historic buildings since the late 1990s is Executive Order 13287 *Preserve America*. Signed by President Bush on March 3, 2003, *Preserve America* calls on the federal government to protect, enhance, and use historic properties owned by the government; to build partnerships with state and local governments, Indian tribes, and the private sector through the use of historic properties to promote local economic development; to maintain accurate information on federal historic properties and their condition; and to seek opportunities to increase public benefit from federally owned historic properties, including heritage tourism.

GSA has been a participant in the development and implementation of *Preserve America* since its conception. The Advisory Council on Historic Preservation (ACHP) and the National Trust for Historic Preservation look to GSA as a leader for its success integrating stewardship responsibilities into the agency's businesslike approach to providing federal workspace. With fifty million gross square feet of GSA-controlled space in historic buildings, we have many opportunities to make a difference by encouraging our client agencies to use historic buildings we own or have an opportunity to lease.

Most directives set forth in *Preserve America* have long been underway at GSA, including

- A national database of GSA historic properties that includes information on material conditions and preservation guidance;
- Working with communities to ensure public benefit from the federal presence;
- Creating an active strategy for using historic buildings and keeping them viable; and
- Increasing public enjoyment of GSA historic buildings by outleasing underutilized buildings, renting ceremonial spaces for special events, creating opportunities for public access, and expanding regional and national Web sites.

A particular concern of *Preserve America* is improving federal stewardship accountability by better managing agency information on historic buildings. GSA has exceptional resources to assist historic building projects. Among them are two unique databases: GSA's Building Preservation Plan (BPP), a computerized preservation planning tool for individual historic buildings; and the Technical Procedures Database, a Construction Specification Institute-indexed source of specifications, construction standards, and technical guidance for historic building projects. Database upgrades underway will eliminate rarely used information fields and expand the content of the BPP to provide frequently requested information on building history, photographic documentation, and treatment options, to better inform GSA decisions and project teams.

Improving GSA's stewardship effectiveness by making critical information more accessible to GSA associates, contract design teams, and consultants will remain a continuing priority. Major accomplishments include updates to the body of sample documents in GSA's online *Preservation Desk Guide*; expansion of GSA's main preservation Web page to include compliance guidance for archeology and a guide to GSA collections by state origin and repository location; tribal consultation guidance; greatly expanded poster, brochure, and film offerings; new regional preservation program Web pages; a Preservation Library providing links to GSA's major preservation publications, guidance, and templates; and an E.O. 13287 guide to heritage tourism sites and activities within GSA historic buildings that are regularly open to the public.

GSA'S HISTORIC BUILDING INVENTORY

Historic buildings contribute significantly to the rich variety of space and settings PBS has to offer its customers. GSA's public buildings legacy includes custom houses, courthouses, post offices, border stations, and federal agency offices across the United States and its territories. Close to half of GSA's 1,568 owned buildings are over fifty years old. Over one-fourth of the inventory, 470 buildings, are listed on or eligible for the National Register of Historic Places, the nation's listing of historic properties designated by the federal government. A handful of Modern-era buildings constructed during the 1960s and 1970s are exceptionally significant architectural icons that have been formally determined eligible for the National Register as well. Others may become eligible on reaching fifty years of age.

Over half, or 254, of GSA's historic buildings have been listed on the National Register of Historic Places. Of the listed buildings, 107 are National Historic Landmarks (NHLs), the highest level of designation, exceptionally significant for their architecture, history, association with significant events, or their potential to yield information. Of these 107 NHLs, 12 are individually listed buildings. The other 10 are congressionally designated National Historic Sites or among the 85 contributing buildings in NHL Districts, such as the Jackson Place Houses in Lafayette Square, located across from the White House in Washington, D.C.¹ Individually listed NHLs in downtown Washington, D.C., include Blair House, significant for its history, and the Pension Building, now known as the National Building Museum, Montgomery Meig's engineering masterpiece. A recent addition to GSA's NHL inventory is the Lafayette Building in Washington, D.C., designated a contributing building in a World War II homefront thematic NHL listing for its postwar role in financing the government effort to redirect wartime assets such as manufacturing infrastructure and equipment to peacetime uses. Congressional National Historic Site designations confer the same level of recognition and protection.

Under an ambitious initiative to meet GSA's National Historic Preservation Act Section 110 compliance responsibilities, most eligible buildings not yet listed will be nominated to the National Register within the next few years.

The geographic distribution of GSA's historic building inventory reflects the demographic development of the United States in the years prior to World War II. Our historic buildings are concentrated east of the Mississippi, especially along the eastern seaboard, with lower concentrations in the southwestern and midwestern states, and a more disbursed scatter of historic buildings in the less populous western and

THE U.S. CUSTOM HOUSE IN
NEW BEDFORD, MASSACHUSETTS,
IS ONE OF GSA'S OLDEST
PUBLIC BUILDINGS AND A
NATIONAL HISTORIC LANDMARK.



U.S. CUSTOM HOUSE
NEW BEDFORD, MA, 1834

Rocky Mountain states. A disproportionate number of our historic buildings are in the smaller towns and cities; this reflects the replacement of smaller historic buildings with new, larger buildings constructed to accommodate expanding space needs in growing cities. Older public buildings in more remote areas of stable or declining population were less likely to be transferred or demolished and replaced with new construction. The greatest volume of space in historic buildings exists in the National Capital Region, where agency headquarters dominate the historic building inventory.

GSA historic buildings are concentrated in city centers within metropolitan areas having populations of 500,000 or more (42 percent of the historic inventory) and are also a prominent presence in small cities (25 percent of the historic inventory) and towns (22 percent). Half or more of the historic buildings in these secondary metropolitan areas and towns are courthouses, often serving their tenants as the principal monumental presence in the community. In major metropolitan areas, where courthouses and custom houses are supplemented by large (over 500,000 sq. ft.) office buildings more typical of the commercial architecture of their day, the government, though substantial in the number of employees it houses, may have less of a focal presence. Historic buildings in remote areas (population 2,000 or less, 12 percent of the historic building inventory) are generally border stations.²

MONUMENTAL BUILDINGS

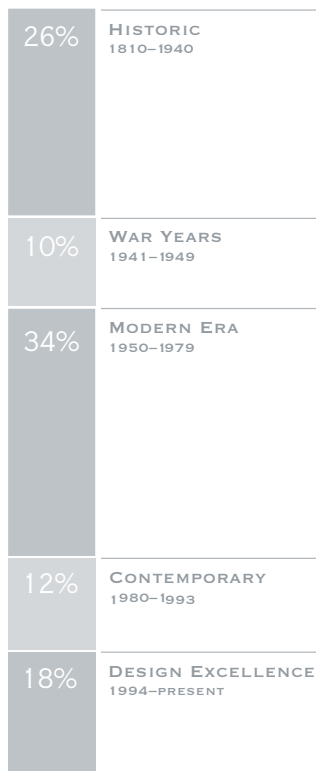
Over half (about 230) of GSA's historic buildings are monumental structures designed to serve a symbolic and ceremonial, as well as functional, purpose—Greek Revival, Second Empire, Romanesque Revival, Beaux Arts, Art Deco, and Neoclassical monuments symbolizing the permanence and stature of the federal government. The majority of these buildings are courthouses, custom houses, post offices,

THE OLDEST BUILDINGS IN THE
GSA INVENTORY ARE SIMPLE
BUT STATELY CUSTOM HOUSES,
POST OFFICES, AND OFFICE
BUILDINGS FINISHED IN BRICK,
STONE, AND STUCCO.

ROBERT C. McEWEN U.S. CUSTOM HOUSE, 1809-1810,
IN OGDENSBURG, NY, IS THE OLDEST BUILDING
IN GSA'S INVENTORY.



**GSA BUILDINGS
BY ERA**



and agency headquarters. The monumental inventory includes a few buildings originally constructed for non-federal use, such as a train station, hotel, sanitarium, school, and insurance company office building. The remaining historic inventory is mostly composed of non-monumental federal office buildings. The oldest buildings in the GSA inventory are simple but stately custom houses, post offices, and office buildings finished in brick, stone, and stucco. Dignified facades and modestly proportioned entry areas with elegant features such as ornamental iron staircases and groin-vaulted ceilings typify GSA's pre-Civil War buildings.

Following the Civil War, as the government sought to reunite a divided populace, the Supervising Architect of the Treasury oversaw design and construction of grand and elaborate public buildings intended to express the power and stability of the federal government. The Old Post Office and Custom House in St. Louis, Missouri, and the State, War, and Navy Building (now the Dwight D. Eisenhower Executive Office Building) in Washington, D.C., both completed in the 1880s, were Second Empire granite edifices set aloft on high platforms, with columned entrance pavilions and statuary setting them apart from surrounding commercial buildings. Toward the end of the nineteenth century, sturdy Romanesque Revival post offices and courthouses with campanile towers of rough-cut stone, segmental arched entrances, and vast skylit work rooms quickly came into, and went out of, fashion. The World's Colombian Exposition of 1893 in Chicago, with Beaux Arts pavilions illuminated by Edison's new electric lights, spurred the City Beautiful movement, setting a new standard for integrated urban design that would redefine the government's image for years to come. Only forty-three buildings constructed before 1900 remain under GSA control today, making up 3 percent of the overall owned inventory.

Most (85 percent) of GSA's historic buildings were constructed between 1900 and 1941, years of great progress in technology, civic planning, and the emergence of America as a leader in Western culture. With the beginning of the twentieth century, public buildings were often planned as part of larger complexes with important civic buildings around landscaped public spaces. Federal public buildings embodied the Beaux Arts design principles of sophisticated proportioning and space planning, with monumental entrances leading to finely finished lobbies and generous corridors that graciously welcomed citizens visiting the government offices. Public building facades, most commonly clad in white limestone or marble, faithfully recreated Classical and Renaissance models associated with the great democracies of Greece and Rome. Integrated into many of these buildings were sculptural details, murals, and statuary depicting or symbolizing the important civic activities taking place within. Close to one-third (139) of GSA's historic buildings were constructed between 1900 and 1929.

Over half of GSA's historic buildings (223) were constructed during the Great Depression. During this time, an expanded federal construction program continued to maintain high standards for public buildings. Architects designing public buildings began introducing the new esthetic of industrial design, combining classical proportions with streamlined Art Deco detailing. The tremendous body of populist civic art commissioned under the Works Progress Administration for new and existing public buildings is a major legacy of this era.



HISTORIC BUILDING STYLES

GREEK REVIVAL

U.S. CUSTOM HOUSE, SAVANNAH, GA



SECOND EMPIRE

U.S. CUSTOM HOUSE, PORTLAND, ME



ROMANESQUE

FEDERAL BUILDING AND U.S. COURTHOUSE, MILWAUKEE, WI

BEAUX ARTS

FEDERAL BUILDING AND U.S. COURTHOUSE,
PROVIDENCE, RI



ART DECO

JOEL W. SOLOMON FEDERAL BUILDING AND
U.S. COURTHOUSE, CHATTANOOGA, TN



NEOCLASSICAL

U.S. COURTHOUSE, DES MOINES, IA



NATIONAL HISTORIC LANDMARKS

Among GSA's most significant properties are twelve individually listed National Historic Landmarks and ninety-five properties within NHL Historic Districts or congressionally designated National Historic Sites. National Historic Landmark is the National Register designation given to the country's most highly significant properties. These include some of GSA's oldest public buildings such as the New Bedford, Massachusetts, U.S. Custom House, built in 1834; architecturally exceptional buildings such as Washington, D.C.'s General Post Office by Robert Mills, constructed in 1842; major engineering achievements such as the 1882 Pension Building, with its massive trussed atrium and advanced natural air circulation system; and properties with exceptional archeological significance, most notably, the African Burial Ground, in New York City, containing human remains and artifacts dating to the 1700s. Washington, D.C.'s seven-building Federal Triangle complex is part of the congressionally designated Pennsylvania Avenue Historic Site. GSA's most recently acquired NHL, St. Elizabeth's Hospital in Southeast Washington, D.C., is a 182-acre, park-like site that includes a historic cemetery and sixty-four historic buildings, the earliest dating to 1853.

SURPLUS WORLD WAR II PROPERTY

Although World War II largely halted construction of federal office buildings, 5 percent of GSA's owned inventory is war-era construction.³ This represents 12 percent of GSA's buildings more than fifty years old. By the time GSA was established in 1949, billions of dollars in surplus real property and equipment had already been transferred by the War Assets Administration to communities, institutions, and private businesses with the intent of sustaining, to the greatest extent possible, the economic benefits to hundreds of communities and individual citizens employed by the wartime production effort, as plants were adapted to serve nonmilitary uses.⁴

As the agency responsible for the disposition of surplus federal real property, GSA assumed responsibility for hundreds of properties still in the federal inventory, which had been constructed or confiscated by the Department of Defense for the war effort. Included in these wartime properties were numerous clusters of industrial structures constructed for the manufacture, distribution, and storage of weapons, equipment,

**GSA-OWNED NATIONAL HISTORIC LANDMARKS,
NATIONAL HISTORIC SITES, AND NATIONAL MONUMENTS**

NATIONAL HISTORIC LANDMARKS

INDIVIDUALLY LISTED

NATIONAL HISTORIC LANDMARKS

**U.S. CUSTOM HOUSE
NEW BEDFORD, MA**

**ALEXANDER HAMILTON U.S. CUSTOM HOUSE
NEW YORK, NY**

**U.S. CUSTOM HOUSE
NEW ORLEANS, LA**

**PIONEER COURTHOUSE
PORTLAND, OR**

**WHITE HOUSE - WEST WING
WASHINGTON, DC**

**LAFAYETTE BUILDING
WASHINGTON, DC**

**U.S. PENSION BUILDING (NATIONAL BUILDING MUSEUM)
WASHINGTON, DC**

**DWIGHT D. EISENHOWER EXECUTIVE OFFICE BUILDING
WASHINGTON, DC**

**GENERAL POST OFFICE (TARIFF)
WASHINGTON, DC**

**PRESIDENT'S GUEST HOUSE - BLAIR HOUSE
WASHINGTON, DC**

**GLOVER HOUSE (AMERICAN PEACE SOCIETY)
WASHINGTON, DC**

**CONTRIBUTING TO A NATIONAL
HISTORIC LANDMARK DISTRICT**

**SAVANNAH NATIONAL HISTORIC LANDMARK DISTRICT
SAVANNAH, GA
U.S. CUSTOM HOUSE
TOMOCHICHI U.S. COURTHOUSE**

NATIONAL HISTORIC SITE

**PENNSYLVANIA AVENUE NATIONAL HISTORIC SITE
WASHINGTON, DC**

**HERBERT C. HOOVER BUILDING (COMMERCE)
U.S. COURT OF MILITARY APPEALS BUILDING
FEDERAL TRADE COMMISSION BUILDING
INTERNAL REVENUE SERVICE BUILDING
U.S. DEPARTMENT OF JUSTICE BUILDING
ARIEL RIOS FEDERAL BUILDING
NANCY HANKS CENTER – OLD POST OFFICE BUILDING
INTERSTATE COMMERCE COMMISSION BUILDING (EPA EAST)
DEPARTMENT OF LABOR BUILDING (EPA WEST)
ANDREW W. MELLON AUDITORIUM**

**CHARLESTON NATIONAL HISTORIC LANDMARK DISTRICT
CHARLESTON, SC**

**U.S. CUSTOM HOUSE
U.S. POST OFFICE AND COURTHOUSE**

**DEALY PLAZA NATIONAL HISTORIC LANDMARK DISTRICT
DALLAS, TX
FEDERAL BUILDING (TERMINAL)**

**CIVIC CENTER NATIONAL HISTORIC LANDMARK DISTRICT
SAN FRANCISCO, CA
FEDERAL BUILDING**

**GEORGETOWN NATIONAL HISTORIC LANDMARK DISTRICT
WASHINGTON, DC
WEST HEATING PLANT**

**LAFAYETTE SQUARE NATIONAL
HISTORIC LANDMARK DISTRICT
WASHINGTON, DC
VETERANS ADMINISTRATION BUILDING
DOLLY MADISON HOUSE
BEN O. TAYLOR HOUSE
COSMOS CLUB
TROWBRIDGE HOUSE
RATHBONE HOUSE
JACKSON PLACE COMPLEX
718 JACKSON PLACE
722 JACKSON PLACE
726 JACKSON PLACE
O'TOOLE-STEELE HOUSE
KNOWER-SCOTT HOUSE
740 JACKSON PLACE
744 JACKSON PLACE**

**ST. ELIZABETHS HOSPITAL
NATIONAL HISTORIC LANDMARK DISTRICT
WASHINGTON, DC
64 CONTRIBUTING BUILDINGS**

NATIONAL MONUMENT

**AFRICAN BURIAL GROUND*
NEW YORK, NY**

* Also listed as a National Historic Landmark

and other war supplies. GSA adapted many of these properties to serve as offices for the expanding federal government. Among the confiscated properties are some of GSA's most imaginative examples of commercial building reuse: the Vista del Arroyo Hotel in Pasadena, California, now housing the U.S. Court of Appeals, and the Kellogg Sanitarium in Battle Creek, Michigan, now a federal center serving several agencies. In recent years, GSA has disposed of a number of such properties so they can be returned to more appropriate community uses, including the Union Arcade in Asheville, North Carolina, now being returned to its historic use as a community marketplace, and the Forest Glen Seminary, underused for years as an annex to the Army's Walter Reed Medical Center in Silver Spring, Maryland, for housing.

Although many of the military-industrial facilities were spartan structures intended for temporary use, their availability at a time of unprecedented government expansion after the war was convenient. While they lacked the monumental presence, ceremonial spaces, and elegant finishes of traditional public buildings, they provided large floor plans for flexible work space configurations, and tall ceilings and windows for light and ventilation. Often, they were structurally capable of supporting nearly infinite volumes of files and storage, and offered plenty of parking space to accommodate a growing suburban workforce.

Master plan documents of the 1950s express pride in the efficiency with which GSA converted these wartime buildings to office space for the expanding civilian government workforce. Efforts to incorporate landscaping and other amenities at these sites foreshadowed the arrival of commercial office parks that later emerged to take advantage of lower-cost property in the suburbs.

Many of these former wartime properties lack the architectural merit, integrity, or singular historic importance required to qualify for the National Register. A number have already been determined ineligible. A few sites, however, such as the former Navy Yard Annex in Washington, D.C., now the Southeast Federal Center, include earlier military-industrial structures eligible for the National Register as a group.

Although GSA's suburban industrial federal centers do not meet the government's urban location goals or GSA's Design Excellence standards, they offer a number of advantages that make them attractive to federal tenants such as convenient onsite parking, large windows, and flexible floor plates for open space office plans. Nevertheless, in areas where the government presence is shrinking or shifting, the priority to keep monumental, community landmark buildings occupied and viable may require divesting of these secondary historic properties.

Despite the challenges of disrupted commuting patterns and negative perceptions about depressed business areas, GSA tenants have shown a willingness to relocate to downtown sites where their basic space needs can be met. Working with tenants and community leaders can help to raise awareness of the government's potential to act as a catalyst for social and economic good and create champions for urban location and reuse, as projects at Ogden, Utah, and Tacoma, Washington, have shown.

Imaginative marketing that highlights traditional urban amenities and conveniences has persuaded tenants to locate in historic "Main Street" buildings. Financial assistance for public transportation (offered to GSA employees in urban areas where public transportation is available) helps to offset loss of free parking offered by most suburban locations. GSA regional offices can also set an example by taking the lead to relocate GSA operations out of suburban federal centers and into the government's historic downtown buildings. Notable GSA relocation and reuse successes include moves by GSA's Mid-Atlantic regional headquarters to the historic Wanamaker and Strawbridge Department Stores in downtown Philadelphia. Community sentiment and proactive involvement still fuels most urban relocation-reuse projects, underscoring the importance of working with the community to promote positive change.

ORIGINALLY CONSTRUCTED AS PART OF A U.S. ARMY SUPPLY DEPOT, THE EXPANDED AND REHABILITATED ADMINISTRATION BUILDING IN THE AUBURN, WASHINGTON INDUSTRIAL COMPLEX NOW PROVIDES STATE-OF-THE-ART WORKSPACE FOR GSA'S NORTHWEST/ARCTIC REGIONAL HEADQUARTERS.



FEDERAL COMPLEX ADMINISTRATION BUILDING, AUBURN, WA

MODERNISM

President Truman created the General Services Administration in 1949 to oversee the federal government's immense building management and general procurement functions at a time when the federal government was experiencing tremendous growth. Between 1960 and 1976, GSA undertook more than seven hundred projects in towns across the United States. About one-third of GSA's owned inventory (nearly half by square foot area) was constructed between 1950 and 1979.

Architects of this era embraced Modern design as more efficient, state-of-the-art, and technologically honest. However, concerned that the caliber of federal construction was declining, in 1962, President Kennedy convened an Ad Hoc Committee on Federal Office Space whose *Guiding Principles for Federal Architecture* would articulate a new philosophy that continues to guide the design of public buildings today. This initiative called for design that reflected "the dignity, enterprise, vigor and stability of the American National government, [placing] emphasis...on the choice of designs that embody the finest contemporary American architectural thought."

When GSA built Modern at its best, it produced strikingly contemporary designs by Modern masters—Marcel Breuer's sweeping Washington, D.C., headquarters building for the U.S. Department of Housing and Urban Development, Mies van der Rohe's sleek Federal Center in Chicago, Illinois, and Victor Lundy's boldly sculptural U.S. Tax Court Building in Washington, D.C. Most federal office buildings of the time, however, are more derivative than iconic. As GSA sought to house legions of federal workers and achieve the goals of standardization, direct purchase, mass production, and fiscal savings, economy and efficiency were often stronger driving forces than architectural distinction. The idea of public buildings as a distinct and recognizable building type gave way to an emphasis on utility and cost containment. As a result, most buildings GSA constructed during the period reflect typical office design of their time, constructed not as hundred-year iconic buildings, but to serve a twenty-five- to thirty-year life cycle.



ROBERT C. WEAVER FEDERAL BUILDING,
U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT HEADQUARTERS
WASHINGTON, DC, 1965-1968



LLOYD D. GEORGE U.S. COURTHOUSE
LAS VEGAS, NV, 2000

TOMORROW'S LANDMARKS: THE DESIGN EXCELLENCE PROGRAM

Seeking to reaffirm how public buildings contribute to the nation's legacy, GSA initiated the Design Excellence program in 1994. This program is grounded in the philosophy that federal buildings should be symbolic of what government is about, not just places where public business is conducted. As builder for the civilian federal government, GSA's goal is to shape this legacy and the way people regard their government through its public buildings. Consistent with the *Guiding Principles*, the program encourages design that embodies the finest contemporary American architectural thought and that also reflects regional architectural traditions.

Specific objectives of the Design Excellence program include ensuring that GSA provides high-quality, cost-effective, and lasting public buildings for the enjoyment of future generations. Under the program, new construction and major repair and alteration projects benefit from peer review by architects who are nationally recognized within the profession. Peers participate in architect selection and are integrally involved throughout design development.

The Design Excellence program has produced award-winning federal buildings in central Islip, New York; Cleveland, Ohio; Las Vegas, Nevada; and many other cities. The program won a 2003 National Design Award of the Cooper Hewitt National Design Museum, Smithsonian Institution, and the 2004 American Architectural Foundation Keystone Award. Public buildings completed under the program now comprise approximately 18 percent of the owned inventory.

USING HISTORIC BUILDINGS

Under the National Historic Preservation Act and Executive Order 13006, federal agencies are required to use historic buildings to the greatest extent possible and to give first consideration to locating in historic properties and historic districts.

GSA has five primary ways of using historic buildings. We reinvest in them so they can serve the modern federal workforce. We reprogram them for new uses when necessary. We are authorized to outlease historic properties to private tenants when there is no immediate federal need. We lease historic buildings (from nonfederal building owners). And we acquire historic properties to meet federal needs.

REINVESTMENT

By reinvesting in federally owned historic office buildings, we ensure that they can continue to serve a twenty-first-century workforce. Our chief investments are in safety, building systems improvements, and exterior maintenance.

PBS's general business policy is to base investment on tenant needs, urgency, fiscal soundness, community support, and other practical considerations, conditioned on the quantitative criterion of acceptable return on investment. In funding decisions concerned with historic buildings, additional qualitative criteria also come into play—building significance, architectural merit, and community benefits, along with long-term stewardship goals and risks.

GSA's capital investment prioritizing methodology continues to give additional weight to historic buildings in ranking projects requiring congressional approval (funding over \$2.7 million). We also continue to provide a 10 percent leasing price preference to make historic buildings that have been rehabilitated to Secretary of the Interior Standards competitive with nonhistoric buildings. Implementation of GSA's

2001 portfolio strategy is now complete. A substantial number of poorly performing properties have been transferred or are in the process of disposal, as GSA continues to move forward with plans to maintain and invest in its core assets.

The Center for Historic Buildings continues flagging financially troubled historic buildings having high architectural significance and working with regions to explore alternative financial remedies and divestment options, for underutilized properties facing sustained vacancy or that are no longer viable for other reasons. Profitable properties will continue to merit greater investment, and extra care is being taken to control costs where cash flow is limited by low market rent rates, small floorplates, and other endemic constraints. GSA's priority for less profitable historic buildings will continue to be maintaining each building's basic usefulness, asset value, and integrity. In a fiscally constrained environment, GSA's goal is to preserve the qualities that contribute to each building's significance through low intervention repair approaches and selective restoration, focusing on highly visible historic spaces and situations in which work can be accomplished as part of other necessary repairs and alterations (e.g., fire safety or mechanical work).

CAPITAL PROGRAM

GSA has discretionary authority over repairs costing under \$2.7 million. Repairs and alterations costing over \$2.7 million require congressional approval and line item approval of each project's major components. Projects are funded through the Federal Buildings Fund (FBF), a revolving fund established in 1959 with the advent of market- and occupancy-based rents making federal agencies accountable for the continuing costs associated with maintaining all workspace they occupy.

Congress has remained committed to reinvesting in America's public building legacy since Government Accounting Office (GAO) studies began calling attention to the government's repair and alterations backlog in the late 1990s, prompting GSA to issue its portfolio strategy in 2001. A ten-year trend analysis shows consistent support for GSA's capital investment strategy of principally modernizing monumental buildings located in strong real estate markets where rents support substantial reinvestment. In the post-millennium arena of strict fiscal accountability and a return-based reinvestment, funding for rehabilitation of Legacy historic buildings has increased from \$94 million in 1999, to \$157 million in 2000, \$220 million in 2001, and \$329 million in 2002—an increase of 230 percent in three years—leveling to approximately \$225 million and \$266 million in 2003 and 2004, respectively, increasing with construction cost inflation from 2005 to 2008 to an average of \$326 million annually, a 350 percent increase over pre-2000 levels.

FUNDING CONSTRAINTS LIMIT OPTIONS FOR
HISTORIC BUILDING REINVESTMENT AND RETENTION

**FEDERAL BUILDING
50 UNITED NATIONS PLAZA
SAN FRANCISCO, CALIFORNIA**

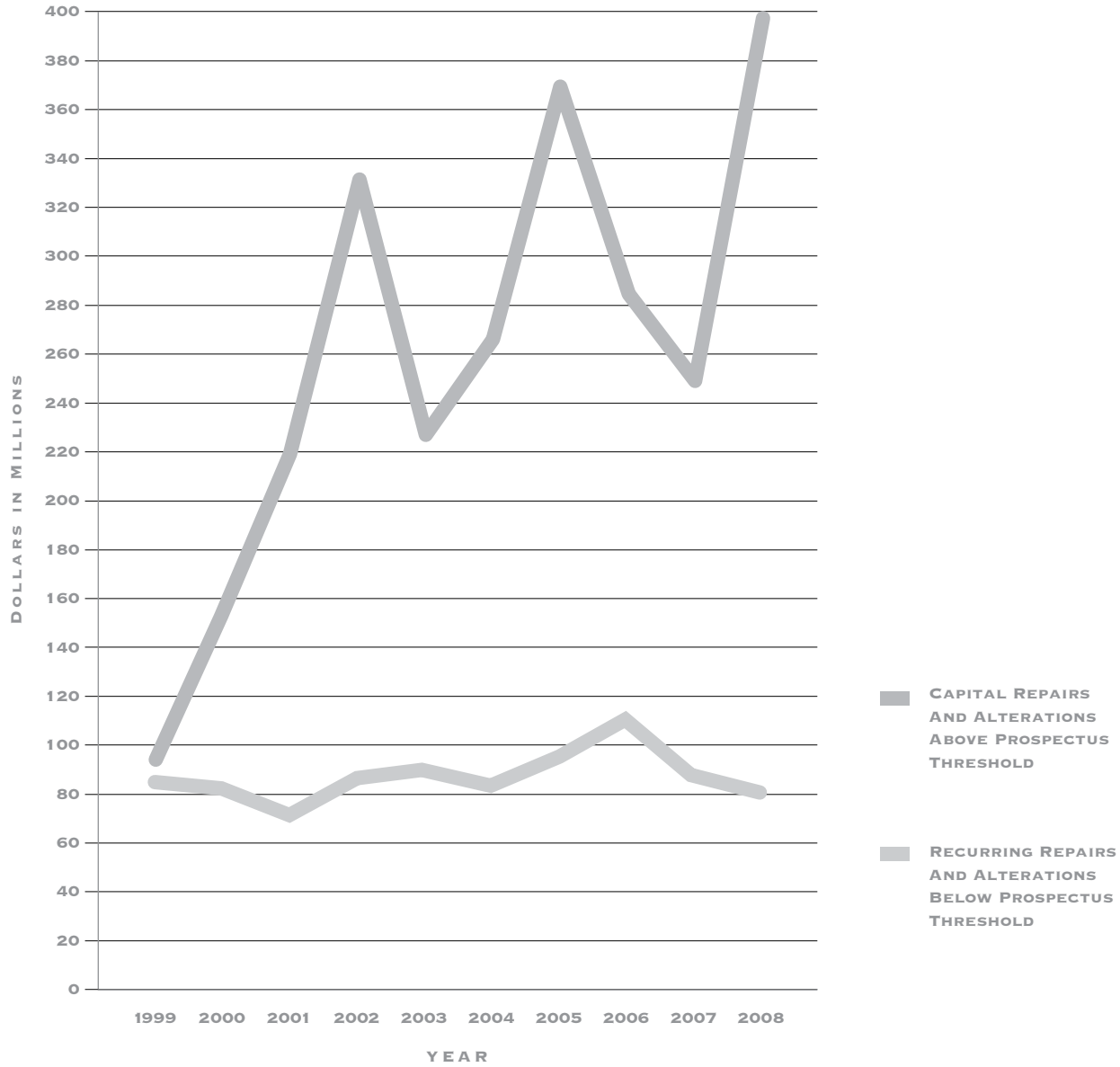
A DECADE OF FLAT REPAIR AND ALTERATIONS FUNDING, DECLINING PURCHASING POWER, INCREASED CONSTRUCTION COSTS, AND CURRENT AUTHORITY LIMITATIONS PREVENT GSA FROM EFFECTIVELY ADDRESSING ITS REPAIR AND ALTERATION BACKLOG OF \$3.6 BILLION. DESPITE GSA'S COMMITMENT TO ITS PUBLIC BUILDING LEGACY, CONTINUED RESOURCE LIMITS AND LACK OF BROADER REINVESTMENT AUTHORITIES WILL CAUSE MORE HISTORIC BUILDINGS TO LEAVE THE FEDERAL INVENTORY. THE FEDERAL BUILDING AT 50 UNITED NATIONS PLAZA, IN THE HEART OF SAN FRANCISCO'S CIVIC CENTER NATIONAL HISTORIC LANDMARK DISTRICT, IS ONE OF MANY MONUMENTAL BUILDINGS REQUIRING SUBSTANTIAL REINVESTMENT TO REMAIN IN FEDERAL USE. SEE APPENDIX E HISTORIC BUILDING REINVESTMENT NEEDS FOR MORE EXAMPLES.

FEDERAL BUILDING
SAN FRANCISCO, CA
1934-1936





**TEN-YEAR TREND—HISTORIC BUILDING
CAPITAL INVESTMENT AND RECURRING
REPAIRS AND ALTERATIONS**



An emerging funding trend since 2006 has been more selective reinvestment evident in larger appropriations for a smaller number of high-priority modernization projects. Between 2001 and 2005, Congress appropriated from \$220 million to \$366 million for eleven to fifteen historic building modernizations each year. Project funding during the first half of the decade averaged \$280 million for an average of thirteen projects annually. From 2006 to 2008, in contrast, funding averaged \$312 million for an average of six historic building modernization projects annually.

In 2008 Congress awarded an unprecedented \$399 million for three large prospectus projects, one involving infrastructure work in a historic building complex, the others involving large historic buildings in urban markets where stable tenancy, life safety urgency, and anticipated return on investment supported targeting the two buildings for comprehensive modernization.

Reuse approaches to courthouse expansion demonstrate how GSA can help to boost the economic health of older communities while preserving historic character. In Mobile, Alabama, federal employees will enjoy working in the restored nineteenth-century Hannah houses within a preserved landscape setting. In Washington, D.C., a planned Department of Homeland Security (DHS) consolidation is expected to generate funds for rehabilitation of long-vacant historic buildings at St. Elizabeth's Psychiatric Hospital, provided that DHS new construction requirements can be tailored to preserve the historic character and landscaped setting of the NHL campus.

Given the small proportion of historic buildings able to rely on prospectus-level capital investment, most of GSA's historic building inventory will continue to depend upon annual recurring repair and alterations appropriations from the Federal Buildings Fund. Traditionally, these funds were transferred as annual allowances to GSA's eleven regions, which had discretionary authority over project funding and modifications up to the \$2.7 million prospectus limit. In recent years as the importance of discretionary repair and alterations funding has become ever more critical as the principal means of sustaining the owned inventory, central oversight of the fund by GSA has increased, with a continuing trend toward managing reinvestment strategically.

Recurring repair and alterations funding has remained flat over the decade, in an environment of declining purchasing power since 2005. With the exception of a funding dip to \$72.5 million in 2001 and a one-time increase to \$109 million in 2006, annual funding for recurring repairs and alterations at GSA historic buildings has remained consistently close to the \$88 million ten-year average.⁵ While a general economic downturn has contained recent-year construction cost increases, the nationwide spike in urban real estate prices will continue to affect costs for construction materials and services for years to come.

HOW ARE WE REINVESTING IN OUR MONUMENTAL HISTORIC BUILDING STOCK?
 DURING THE 2005–2008 REPORTING PERIOD, GSA CONTINUED INVESTING IN
 HISTORIC COURTHOUSES THAT ARE PROMINENT LANDMARKS IN THEIR COMMUNITIES:

2005

JOHN MINOR WISDOM
 U.S. COURT OF APPEALS BUILDING
 NEW ORLEANS, LA

MARTIN LUTHER KING U.S. COURTHOUSE
 ATLANTA, GA

POTTER STEWART U.S. COURTHOUSE
 CINCINNATI, OH

WILLIAM NAKAMURA U.S. COURTHOUSE
 SEATTLE, WA

U.S. COURT OF APPEALS BUILDING
 ATLANTA, GA

THURGOOD MARSHALL
 U.S. COURTHOUSE
 NEW YORK, NY

EDWARD EVERETT DIRKSON
 U.S. COURTHOUSE
 CHICAGO, IL

BIRCH BAYH FEDERAL BUILDING
 AND U.S. COURTHOUSE
 INDIANAPOLIS, IN

2006

JAMES A. WALSH COURTHOUSE
 TUSCON, AZ

U.S. POST OFFICE AND COURTHOUSE
 SAN ANTONIO, TX

2007

FEDERAL BUILDING AND U.S. COURTHOUSE
 MILWAUKEE, WI

FEDERAL BUILDING AND U.S. COURTHOUSE
 ALBUQUERQUE, NM

U.S. POST OFFICE AND COURTHOUSE
 BROOKLYN, NY

U.S. POST OFFICE AND COURTHOUSE
 NEW BERN, NC

2008

THURGOOD MARSHALL U.S. COURTHOUSE
 NEW YORK, NY (CONSTRUCTION)

LOCATED STRATEGICALLY IN HISTORIC
 ALAMO SQUARE, THE U.S. POST OFFICE
 AND COURTHOUSE IN SAN ANTONIO
 WILL RECEIVE A MECHANICAL UPGRADE,
 FIRE SAFETY IMPROVEMENTS, AND
 A NEW COURTROOM ALLOWING THE
 BANKRUPTCY COURTS TO EXPAND
 WITHIN THE BUILDING AND CONTINUE
 TO MAINTAIN A PRESENCE IN THE
 CITY'S CENTRAL BUSINESS DISTRICT.



U.S. POST OFFICE AND COURTHOUSE
SAN ANTONIO, TX, 1935-1936



DWIGHT D. EISENHOWER EXECUTIVE OFFICE BUILDING
WASHINGTON, DC, 1871-1888

ANNUAL APPROPRIATIONS ALSO SHOW CONTINUING SUPPORT FOR MODERNIZING LEGACY OFFICE BUILDINGS, PRINCIPALLY AGENCY HEADQUARTERS IN WASHINGTON, D.C.'S MONUMENTAL CORE, A PROFITABLE MARKET, GIVEN THE MAGNITUDE AND STABILITY OF THE FEDERAL PRESENCE. CLOSE TO HALF OF GSA'S CAPITAL PROJECTS INVOLVING HISTORIC PROPERTIES WERE MODERNIZATIONS OF CABINET AGENCY HEADQUARTERS BUILDINGS IN AREAS WHERE OCCUPANCY OF GOVERNMENT-OWNED BUILDINGS OFFERS CLEAR LOCATION AND FINANCIAL ADVANTAGES:

2005

DWIGHT D. EISENHOWER EXECUTIVE OFFICE BUILDING, WASHINGTON, DC

MARY E. SWITZER BUILDING (DEPARTMENT OF HEALTH AND HUMAN SERVICES), WASHINGTON, DC

LAFAYETTE BUILDING, WASHINGTON, DC

FEDERAL BUILDING, HILO, HI

2006

MAIN INTERIOR BUILDING, WASHINGTON, DC

U.S. GENERAL SERVICES ADMINISTRATION BUILDING, WASHINGTON, DC

HERBERT C. HOOVER BUILDING (DEPARTMENT OF COMMERCE), WASHINGTON, DC

2007

HARRY S. TRUMAN BUILDING (STATE DEPARTMENT), WASHINGTON, DC

NEBRASKA AVENUE COMPLEX, WASHINGTON, DC

2008

NEBRASKA AVENUE COMPLEX (DEPARTMENT OF HOMELAND SECURITY), WASHINGTON, DC

DWIGHT D. EISENHOWER EXECUTIVE OFFICE BUILDING, WASHINGTON, DC (CONSTRUCTION)

APPROPRIATION OF FUNDS FOR CONSTRUCTION OF COURTHOUSE BUILDINGS AND ANNEXES PLANNED TO SUPPLEMENT, RATHER THAN REPLACE, HISTORIC BUILDINGS HAS ALSO CONTINUED, ALBEIT AT A SLOWER PACE SINCE THE COURTHOUSE CONSTRUCTION MORATORIUM PUT A HOLD ON COURT EXPANSION PROJECTS IN 2004. COURTHOUSE EXPANSION PROJECTS IN PROGRESS OR COMPLETED DURING THE PAST DECADE REUSED HISTORIC COURTHOUSES IN THE FOLLOWING CITIES:

- BROOKLYN, NY
- ERIE, PA
- WASHINGTON, DC
- SALT LAKE CITY, UT
- RICHMOND, VA
- CLEVELAND, OH
- SEATTLE, WA
- MIAMI, FL
- WHEELING, WV
- TRENTON, NJ
- NEW YORK CITY, NY

FUTURE EXPANSION
ONTO A NEARBY PARCEL
WILL ENABLE REUSE OF
GSA'S WALTER E. HOFFMAN
U.S. COURTHOUSE IN
NORFOLK, VIRGINIA.

WALTER E. HOFFMAN U.S. COURTHOUSE
NORFOLK, VA, 1932-1934.





FORMER CITY LIBRARY
ERIE, PA, 1897.

Amid construction costs rising at 5 to 7 percent annually, continued repair and rehabilitation funding limits may require increasingly challenging prioritizing to balance GSA's financial and stewardship goals. Toward this end, the Center for Historic Buildings continues working with GSA's regional preservation staff to develop strategies for approaching building needs as cost-effectively as possible and assisting regions in setting major and minor repair and alteration investment priorities to keep Legacy buildings occupied and viable.

REPROGRAMMING (OWNED INVENTORY)

As federal space needs change, GSA keeps buildings viable by reprogramming them to serve new functions.

The key to successful reprogramming is matching available buildings to suitable tenants. The best fit is that in which GSA's tenants are able to make the most of a building's historic architectural features and minimize the need for costly alteration that compromises historic character. Bankruptcy courts, for example, are ideal backfill tenants for historic courthouses and custom houses, since they do not require separate circulation and other security features that criminal courts do. Successful examples include GSA's 1881 courthouse in Little Rock, Arkansas, and the 1907 Alexander Hamilton U.S. Custom House in lower Manhattan, two showcase properties housing bankruptcy courts. The elaborately embellished Beaux Arts City Library in Erie, Pennsylvania, is also being reused by bankruptcy courts. The historic Gulfport, Mississippi, High School, not suited to house courtrooms or judges chambers, proved well suited for attorneys' offices, eliminating the need for major security modifications that would have made reuse prohibitively expensive.

Other projects are meeting tenant expansion needs by reprogramming areas within GSA historic buildings to serve new functions. Former postal workspace in GSA federal courthouses continues to provide convenient expansion space for growing courts—convenient not only because it eliminates the need to construct space outside of the existing building envelope, but also because the high ceilings, abundant natural light, and unbroken spaces that characterize historic postal work areas are well suited for build-out as ceremonial space. Postal work areas in the Davenport, Iowa, courthouse now serve as jury assembly and public waiting areas. The Brooklyn, New York, courthouse captures space in the building's sky-lit atrium to meet the project's office space requirements. At the Metzenbaum Courthouse in Cleveland, Ohio, a light court enclosed under a skylight created courtroom circulation and queuing space.

BANKRUPTCY COURTS ARE WELL SUITED TO BUILDINGS OFFERING CEREMONIAL SPACE SUCH AS THE BEAUX ARTS LIBRARY IN ERIE, PENNSYLVANIA, NOW PART OF GSA'S FEDERAL COURTHOUSE COMPLEX.

OUTLEASING (OWNED INVENTORY)

Using the authority provided by Section 111 of the National Historic Preservation Act, GSA leases space in underutilized historic federal buildings to nonfederal tenants. Section 111 allows federal agencies to retain this rental revenue and reinvest it in historic buildings. These “outleases” relieve GSA of the financial liability for maintaining currently unneeded or underutilized historic property while ensuring long-term stewardship and public access to important public buildings.

Principal reasons for outleasing include

- Covering the costs of retaining highly significant property for potential future use;
- Leveraging private investment in important federal buildings for which GSA cannot get reinvestment funds;
- As a temporary holding strategy, ensuring proper stewardship and public access to important public buildings, when divesting cannot do so;
- Covering operating and repair costs as an interim measure until federal leases expire or until federal tenants can be relocated from less significant owned historic buildings;
- Filling vacant space so that a federal tenant can maintain a viable presence in a historic federal building, particularly in locations historically associated with the particular tenant;
- Protecting important historic buildings where private ownership would compromise National Register-qualifying attributes or future preservation oversight; and
- Earning revenue to underwrite the historic building inventory (lesser buildings may be worth retention and outleasing if they generate sufficient profit to support other important buildings in the inventory).

Section 111 is the only authority that allows agencies to lease to nonfederal entities space *anywhere* in a historic building, and to lease buildings in whole or in part. Other benefits of the authority are that the revenue can be retained for two years and that GSA enjoys considerable discretion in how it is spent. Funds must be spent for preservation purposes but are not constrained by the Federal Buildings Fund prospectus limitations.

Although available since the 1980s, Section 111 outleasing authority remained untapped by GSA until the late 1990s. Until that time, nonfederal activities in GSA buildings were generally limited to cafeterias, newsstands, and other tenant retail services primarily serving the federal building. Today, the revenue generated by the broader outleasing authority of Section 111 is funding restoration of irreplaceable historic finishes, reclamation of unsympathetically altered spaces to again serve as ceremonial gateways, and critical repairs at historic GSA buildings unable to compete for prospectus-level reinvestment or recurring repair and alteration funds.

Acknowledging that existing revenue disbursement procedures did little to encourage outleasing as a remedy for underutilized historic buildings, in 1999 GSA's Center for Historic Buildings worked with GSA's Retail Services Center of Expertise to establish a national solicitation and project review process that gives preference to regions and buildings earning outleasing revenue. Since then, outleasing has eliminated or reduced vacancies in dozens of buildings and tripled GSA's outlease revenue (Budget Activity 64, or BA64) fund in four years from \$3,002,182 in 1999 to \$13,444,883 in 2003, buoyed in part by GSA's \$7 million annual McCormack Building outlease.

Although a small sum compared to the Federal Buildings Fund, strategically invested outlease revenue makes a critical difference in GSA's ability to meet its stewardship priorities. At the John W. McCormack U.S. Post Office and Courthouse in Boston, Massachusetts, outleasing kept the building occupied and earning revenue between federal tenants as GSA waited for Environmental Protection Agency leases to expire. The five-year outlease brought in over \$36.5 million, contributing significantly to GSA's capital improvement fund for the building and other GSA Legacy buildings.

Continuing regional marketing efforts have helped to sustain sufficient revenues to support brick and mortar reinvestment projects that have contributed meaningfully to the viability and integrity of the historic building inventory. Between 2004 and 2007, Regions 2, 5, 7, and 9 increased their outleasing revenues by factors of two to four, principally from partial building and film outleases capturing value in buildings that continue to house federal tenants, even as outlease revenues leveled to \$4.5 million in 2007.

Anticipated rents from new retail tenants in the Chicago Federal Center, the Audubon Insectarium in New Orleans, and scheduled Hotel Monaco escalations for the General Post Office (Tariff Commission) in Washington will continue building the fund. Projected revenue from the 160-year-old NHL General Post Office (GPO) Building is \$50 million over the sixty-year lease term, in addition to the privately funded restoration of ornamental spaces, replacement of all building systems, and sensitively designed modifications to bring the building up to current codes.

This precedent-setting GPO project remains the agency's principal ground lease business model. Goals of the Request for Qualifications and Use (RFQ&U) process were to generate sufficient revenue to fund repair, maintenance, and operating costs with a sympathetic occupancy that would preserve, restore, and enable continued public use of the National Historic Landmark's finest ornamental spaces.

Coordinating complex outleases that involve highly significant property generally requires time and special expertise to develop a marketing strategy, generate requests for proposals and developer qualifications, evaluate reuse options, undertake GSA's internal proforma analysis of development costs, and involve the public. Leases for less significant and less visible GSA historic property can often be negotiated more quickly and easily, since they are less likely to contain elaborate spaces that might be compromised by a

change of use. The more important a property and the greater GSA's legal and public relations exposure, the more time the process merits.

Although ground lease redevelopment transactions require substantial effort and may be of limited interest to prospective government or institutional tenants preferring to acquire an equity interest in a building, outleases offer decisive stewardship advantages over fee and public benefit transfers in a variety of circumstances. Only Section 111 outleasing—because the authority is stewardship-focused—benefits from the option of a leasing process designed to ensure selection of the best-preservation-fit use from among economically viable alternatives. In the GPO RFQ&U model this was achieved through a nonprescriptive approach structured to identify the best preservation and economic options the market could offer. Rather than listing specific, minimum preservation requirements, the GPO RFQ&U described preservation and community goals such as public access and consistency with local urban planning criteria. Developers best able to meet all of the project goals were the most competitive. While economic viability of the proposed use (including the development team's track record) was a prerequisite for consideration, preservation fit remained paramount among proposal selection factors. The RFQ leasing process allows the government complete flexibility to decide the relative importance of differing criteria, such as public access for community use, and weigh the selection accordingly. By comparison, public benefit authority can limit the range of uses to those serving a government or educational purpose, without necessarily providing broad public access. Public sale can be limited to preservation-qualified developers but cannot allow selection of one use over another because it promises better public access or a more preservation-appropriate function.

Legacy buildings using outlease funds for targeted reinvestment to support continued federal occupancy or attract new federal tenants include the 1810 Robert McEwan U.S. Custom House in Ogdensburg, New York; the U.S. Custom House in New Bedford, Massachusetts; and the U.S. Custom House in New Orleans, Louisiana. At the Ogdensburg U.S. Custom House, a building too small to compete successfully for recurring repair and alterations (Budget Activity 54) funding, \$425,000 in outlease revenue will fund in-kind standing seam roof replacement and interior upgrades sufficient to enable the Customs and Border Protection Service to expand and fully occupy the building, raising it from underperforming to performing status. At the 1836 National Historic Landmark U.S. Custom House in New Bedford, Massachusetts, a focal point of the historic port city, \$300,000 in outlease revenues will fund a comprehensive interior and exterior design study for the building's long-term rehabilitation and reuse to secure a stable long-term tenant following the departure of the National Park Service for rent-free quarters in another historic building. At the New Orleans U.S. Custom House, another National Historic Landmark and one of the most significant buildings in GSA's inventory, \$2.5 million in emergency funding enabled timely repair of damage from Hurricane Katrina, to get the building reoccupied and earning rent as quickly as possible.

TARGETED REINVESTMENT
USING OUTLEASING REVENUE
FROM SECTION 111 LEASES
TO NONFEDERAL TENANTS
HELPED GSA MAINTAIN
FEDERAL TENANTS TO KEEP
THE 1878 CENTURY POSTAL
STATION IN RALEIGH, NORTH
CAROLINA, FINANCIALLY VIABLE
FOR CONTINUED FEDERAL
OWNERSHIP AND USE.



PHOTO:
CENTURY POSTAL STATION
RALEIGH, NC, 1878.

Outlease funds upgraded interior systems and reclaimed the integrity of an unrecognizably altered entrance lobby-corridor in Port Huron, Michigan, to secure a long-term tenant. Similarly, an investment of \$2.3 million at the 1878 Century Postal Station in Raleigh, North Carolina, funded roof repairs to halt infiltration, courtroom lighting restoration, creation of a badly needed additional courtroom, and exterior conservation to retain GSA's court tenants in a troubled Legacy building that was becoming untenable.

Historic building outleases remain the principal funding source for the care of historic artwork in GSA's legacy buildings as well, most recently funding conservation of Daniel Chester French sculptures at the Alexander Hamilton U.S. Custom House in New York City and the Howard M. Metzenbaum Courthouse in Cleveland, Ohio, as well as conserving historic murals in the Byron White U.S. Courthouse in Denver, Colorado, and the newly renovated John W. McCormack U.S. Post Office and Courthouse in Boston, Massachusetts.

To place these ostensibly modest investments in perspective, it is important to gauge what outleasing funds accomplish not by the amount of funding directed to a project, but in terms of their impact in the eyes of the communities within which they are located. Rehabilitations completed for just a few million dollars each at the Century Postal Station Building in Raleigh, North Carolina, and at the Natchez, Mississippi, Memorial Hall to house relocated U.S. courts generated enthusiastic local press at every stage. To secure a stable new public use and stewardship support for their local landmark, the city of Natchez donated the site, a right-sized monumental public building, and \$1.8 million in county and city bonds, as well as a \$400,000 state Archives and History grant.

Because outlease revenues are often directed to legacy buildings in the nation's less lucrative markets, these investments tend to be well leveraged in local support and commitment. In smaller communities, a modest federal investment of outlease proceeds can make a great difference and a big impression.

The flexibility to outlease vacant space within underutilized historic buildings or execute ground leases to fund needed capital investment could have a major impact on GSA's ability to sustain the historic inventory in the long term. It is already serving both as a temporary solution, in the absence of an immediate federal use, and as a longer-term solution to ensure continued public access to important public landmarks and the means to retain the government's land and building investment in urban areas where federal needs can change over the course of a twenty- or thirty-year lease and where retention of centrally located, high-quality property is in the government's interest.

Funds earned by outleasing space in historic buildings are redirected to regions approximately in proportion to regional earnings. GSA seeks opportunities, in the competitive project selection process, to improve the viability and integrity of GSA historic buildings nationwide and to promote regional preservation practices that merit recognition as national models. As GSA strives to pare the inventory of financial



NONFEDERAL LEASE REDEVELOPMENT ENSURES LONG-TERM STEWARDSHIP
AND CONTINUED PUBLIC ACCESS TO A NATIONAL HISTORIC LANDMARK

S U C C E S S S T O R Y

**HOTEL MONACO (GENERAL POST OFFICE)
WASHINGTON, D.C.**

SECTION 111 OF THE NATIONAL HISTORIC PRESERVATION ACT AUTHORIZES GSA TO LEASE UNDERUTILIZED HISTORIC FEDERAL BUILDINGS IN WHOLE OR PART TO NONFEDERAL TENANTS, RELIEVING GSA OF THE FINANCIAL LIABILITY FOR MAINTAINING CURRENTLY UNNEEDED PROPERTY WHILE ENSURING LONG-TERM STEWARDSHIP AND PUBLIC ACCESS TO IMPORTANT PUBLIC BUILDINGS. MOSTLY VACANT FOR MANY YEARS, THE NATIONAL HISTORIC LANDMARK GENERAL POST OFFICE (TARIFF COMMISSION BUILDING) IN WASHINGTON REOPENED AS A BOUTIQUE HOTEL IN 2002. BENEFITS TO THE GOVERNMENT INCLUDE PRIVATELY FUNDED RESTORATION OF ORNAMENTAL SPACES, REPLACEMENT OF ALL BUILDING SYSTEMS, SENSITIVE MODIFICATIONS BRINGING THE BUILDING UP TO CURRENT CODES, AND \$50 MILLION IN RENTAL REVENUE OVER THE SIXTY-YEAR LEASE.

PHOTO.
HOTEL MONACO, TARIFF BUILDING
WASHINGTON, DC, 1842



losers without losing sight of its stewardship responsibilities, outleasing offers the potential to maintain full occupancy in smaller federal buildings within older central business areas that depend on a federal presence or where visibility in a community landmark benefits the federal tenant.

Outleasing will likely remain the critical source of revenue for sustaining ornamental special-use space not supportable by federal rental revenue alone. The Northeast/Caribbean Region typically earns \$10,000 for a single filming event at the Alexander Hamilton U.S. Custom House in New York City. In response to film industry interest in its numerous historic courthouses, the Southeast/Sunbelt Region developed a marketing brochure promoting its historic buildings as film locations. To further assist regions in marketing historic buildings as film locations, the Center for Historic Buildings developed a film industry marketing package profiling GSA's film location opportunities, with sample agreements, lists of available and previously used film locations, and GSA regional contacts.

Sustaining momentum in the request for proposal and selection process remains key to bringing outlease efforts to successful conclusion. Successful selection and community involvement processes at GPO underscore the value of selection criteria that stress the architectural compatibility of new uses. Outlease agreements also need to include preservation guidelines stipulating how repairs and alterations are to be planned and executed, including groups involved, and a clear explanation of the responsibilities of GSA and the tenant/developer.

Except in cases where the prospective tenant is an extremely reliable steward and the change in use will have a negligible physical impact on the building, the outleasing process should be structured to reach as broad a market as possible and generate a variety of use alternatives. The goal is to identify a use that will minimize adverse effects on historically significant spaces and features of the building and a tenant/developer who is reliable from both a financial and stewardship standpoint to ensure the stability of the occupancy.⁶

LEASING

When space is not available in government-owned buildings, we give historic buildings first preference in searching for leased space. GSA leases roughly 175 million square feet in 7,106 buildings. Of these, approximately 190 are historic buildings, providing GSA tenants about 5.6 million square feet of space. Over a third of these buildings are owned by the U.S. Postal Service; a few are controlled by the National Park Service. The remaining one hundred or so are privately owned.⁷

The National Historic Preservation Act (NHPA) and Executive Order 13006 call upon federal agencies to use historic buildings to the greatest extent possible, giving first consideration to locating in historic properties within historic districts. Successful historic building leases gain GSA positive visibility and build our image as a good neighbor.



STRAWBRIDGE AND CLOTHIER BUILDING
PHILADELPHIA, PA, 1928

FOLLOWING EXPIRATION OF GSA'S
LEASE IN PHILADELPHIA'S FAMED
WANAMAKER DEPARTMENT STORE
BUILDING, DESIGNED BY ARCHITECT
DANIEL BURNHAM IN 1903, GSA
SOUGHT SPACE IN ANOTHER HISTORIC
DOWNTOWN RETAIL ICON, RELOCAT-
ING TO THE 1928 STRAWBRIDGE AND
CLOTHIER BUILDING IN 2002.

Through an interagency Memorandum of Understanding, GSA cooperates with the U.S. Postal Service to keep historic post offices in areas where the government maintains a federal presence occupied and viable as public buildings. These leases have a critical impact on older central business areas by keeping significant civic buildings in public use. GSA's principal post office building tenant is the U.S. courts, who occupy nearly half (thirty-four of the seventy-seven buildings, or 45 percent of GSA's post office leases). Generally, these are historic post offices that have housed federal courts for many years but were retained by the U.S. Postal Service when GSA was established because the Postal Service remained the principal occupant. Other major GSA tenants in post office buildings are the U.S. Custom Service (12 percent), congressional offices (12 percent), and the Federal Bureau of Investigation (11 percent).

In response to the locational hierarchy established under Executive Order 13006, the Center for Historic Buildings undertook a study of GSA historic building leasing in 2000 to assess the merit of continuing or modifying GSA's 10 percent lease "price" (cost) preference.⁸ Goals of the study were to determine the impact of the price preference on lease selection and examine GSA historic building leasing successes and trends to develop strategies to increase leasing of space in historic buildings.

Although most historic buildings leased through competitive space procurement had, for the most part, won the leases on their own merits, the 10 percent lease cost advantage was sufficient to tip the balance toward historic buildings in a number of important cases, showing that the preference, while not making the critical difference for most historic building leases, remains important where the presence of the federal government in the historic town center is an important stabilizing element. The final lease acquisition rule, published in the October 19, 2001, *Federal Register*, retained the 10 percent lease price advantage for historic building offerors, adding a 2.5 percent lease price advantage for undeveloped sites in historic districts located within city centers.

Additional pressure exerted by the executive order also appears to be having a positive effect on historic building lease awards. GSA's largest historic building lease until recently was the 400,000-square-foot area leased for GSA's Mid-Atlantic headquarters in the historic Wanamaker Department Store in downtown Philadelphia. When the Wanamaker lease expired in 2002, GSA relocated, rather than seek temporary housing and incur swing space costs while the Wanamaker interior was rehabilitated to meet changing space and infrastructure needs. The headquarters now leases a somewhat smaller space in the Strawbridge and Clothier Building, another historic Philadelphia department store. GSA's Northeast/Caribbean Region has located the federal courts in New York City within the iconic 1913 Woolworth Building—once the tallest building in the world—while the Foley Square courthouse is undergoing modernization.

In Roxbury, Massachusetts, local residents rallied to halt demolition of the 1914 Roxbury Boys Club, now the Fairfield Center, and worked with GSA to attract a federal tenant and see the lease through. The



U.S. COURTHOUSE
TACOMA, WA, 1909-1911, 1992

restored historic building now houses the Social Security Administration. In 2003 the Advisory Council on Historic Preservation recognized GSA's achievement in a national stewardship award.

Another ACHP award-winning lease redevelopment is the GSA's adaptive use of the Ogden, Utah, historic Boyle Furniture Warehouse to house the Internal Revenue Service (IRS). The early twentieth-century industrial building, with large windows and tall floor-to-ceiling heights, has proven well suited to configuration as open area work space for federal offices. The project was so well received that the IRS subsequently leased a second industrial building to house a cafeteria that is also open to the public, a preservation triumph for the community and a public relations success for IRS.

Since then, IRS has continued setting an example for other agencies by seeking out opportunities to reinvigorate historic downtown business areas by consolidating functions scattered in multiple suburban facilities to underutilized downtown post office properties. IRS regional service center lease redevelopment consolidation in Kansas City's historic main post office, completed in 2006, is powering a badly needed economic boost for historic Kansas City while returning another city landmark to public use. The historic building had been underutilized since 1999, when sixteen hundred employees were relocated to new postal facilities in Kansas City. Availability of adjacent land previously acquired by the U.S. Postal Service for future expansion enabled IRS to expand beyond the 373,000-square-foot historic building into three sensitively designed new wings to create a one-million-square-foot facility housing between four and six thousand workers for year-round and seasonal work. Postal retail functions employing more than two hundred workers were relocated to the nearby historic Union Station to help boost foot traffic there.

IRS employees are expected to generate an additional \$2.5 to \$3 million in annual revenue at historic Union Station's eating establishments and retail stores. Amenities at the historic post office building include carefully restored public lobbies and wood-paneled executive offices, now serving as conference rooms, along with state-of-the-art work space flooded with daylight. To conserve energy and utility costs, the annexes are designed so that areas occupied by seasonal employees can be closed when tax form processing is completed each year.

GSA'S THIRTY-YEAR LEASE-
PURCHASE OF UNION STATION
IN TACOMA, WASHINGTON, FOR
USE BY THE FEDERAL COURTS WAS
CONDITIONED ON GSA ENSURING
CONTINUED PUBLIC ACCESS TO
THE STATION'S ELEGANT GRAND
ROTUNDA UNDER THE GIANT DOME.

A year after completing the Kansas City project, IRS reached agreement with GSA and the Postal Service on a plan to consolidate IRS operations in and around Philadelphia in a similar campus centered on redevelopment of the city's historic main post office building at Thirtieth and Market Streets in a public-private effort facilitated by Pennsylvania State University as part of a larger redevelopment plan. An urban planning goal of the new IRS campus is to strengthen the gateway between downtown Philadelphia and the University City area along the Schuylkill River. The expanded historic building will provide work space for over five thousand employees in approximately 900,000 square feet of space.

In an effort to better identify, preserve, and market historic leased properties, GSA now requires its space tracking and administration database, STAR, to make building construction dates a mandatory data field for new or renewing leases. Standard solicitation templates for fast-track “e-leases” and general lease acquisitions include clauses outlining the E.O. 13006 hierarchy and National Historic Preservation Act goals. GSA’s Real Estate Acquisition Division is also working with the Center for Historic Buildings to develop a historic building occupancy profile outlining the extent to which specific regions and agencies are leasing historic buildings, what the key tenant drivers are, how the E.O. 13006 tiered locational hierarchy works, and how GSA can promote location in historic buildings.

GSA realty specialists can tip the balance toward reuse by encouraging clients to think creatively about their space needs and consider the unique qualities historic buildings offer. Establishing relationships among tenants, project teams, and the community also builds agency awareness of the government’s potential to contribute to the economic health and vitality of older towns by reinvesting in vacant historic buildings and existing infrastructure.

ACQUISITION

Through our Urban Development, Preservation, and Design Excellence programs, GSA works with communities to make the most of historic properties we have an opportunity to acquire. Among the most notable such opportunities was GSA’s Erie, Pennsylvania, federal courthouse expansion project, which included acquisition of a turn-of-the-century Beaux Arts municipal library and a former Art Moderne clothing store to supplement GSA’s 1930s Art Deco federal courthouse. The three structures are linked by a contemporary addition that serves as a gateway to the complex and enabled the site to meet the courts’ space requirements, tripling the space available for the courts, at 9 percent less than the cost of new construction. Because of low site acquisition costs, the project was less costly than all new construction—even with the restoration of art and ornamental finishes in the city library providing GSA’s client agency meeting and special use space that could not affordably be constructed today.

Federal court expansion needs also continue positioning them to absorb vacated postal work space and keep these important public buildings in community use. Acquisitions since 2000 include a historic post office and courthouse in Fergus Falls, Minnesota, a courthouse in New Bern, North Carolina, and a number of smaller historic structures on sites acquired for construction of new courthouses. In Fergus Falls, GSA had been leasing space from the Postal Service for the federal courts in the Classical Revival post office, probably since PBS was established in 1949. GSA assumed ownership in 2002, converting the former postal work area to offices for the U.S. Marshals Service after the Postal Service vacated the building to relocate elsewhere.

REHABILITATION WITH ANNEX
CONSTRUCTION FOR GSA’S 1932
FRANK E. MOSS U.S. COURTHOUSE
IN SALT LAKE CITY, UTAH, WILL
EXTEND THE LIFE OF THE 1905
GREEK REVIVAL EDIFICE AT RENT
RATES BELOW THAT OF NEW
CONSTRUCTION MEETING CURRENT
FEDERAL COURTHOUSE DESIGN
REQUIREMENTS. THE OLDEST
BUILDING IN SALT LAKE CITY’S
EXCHANGE PLACE HISTORIC
DISTRICT, THE 1905 BUILDING
WAS EXTENDED IN 1912 AND
REFACED IN GRANITE AS PART OF
A SECOND EXPANSION IN 1932.



FRANK E. MOSS U.S. COURTHOUSE
SALT LAKE CITY, UT



A recurring Section 106 compliance issue is the reduced general public access that can result from these postal relocations. GSA works with the Postal Service and community organizations to seek solutions that allow continued public access to important community landmarks while ensuring the safety of the buildings' federal tenants.

GSA's thirty-year lease-purchase of Tacoma Union Station in Washington State for use by the federal courts, for example, was conditioned on GSA ensuring continued public access to the station's elegant grand rotunda. The historic rotunda now houses a glass museum that is open to the public. Courtrooms and other secure functions are housed in a rear addition in perpetuity.

GSA's Southeast/Sunbelt Region has been especially imaginative in finding ways to reuse vernacular historic buildings in courthouse expansion projects. Adjoining the new annex to GSA's federal courthouse in Montgomery, Alabama, is a National Register-eligible bus station famous as the site of 1961 riots spurred by the arrival of Freedom Riders seeking to desegregate public transportation throughout the South. The former bus station has been leased to the Alabama Historical Commission to serve as a civil rights history museum. To ensure appropriate security for the nearby federal courts, GSA's outlease agreement with the historical commission reserves the right to close the museum to limit public access to the property during times of heightened security, a solution that has successfully met federal security and stewardship goals for the site.

GSA's new courthouse in Gulfport, Mississippi, includes a 1920s high school now housing the U.S. Attorney's office. GSA's expanded Mobile, Alabama, federal courthouse will include two restored mid-nineteenth-century houses acquired for use as court offices. The region also acquired a block of historic row buildings in downtown Atlanta to accommodate increased court office space needs in the adjoining Elbert P. Tuttle U.S. Courthouse.

From the standpoint of integrating stewardship and portfolio strategies, one of GSA's most important stewardship precedents in recent years, is the exchange of a larger historic courthouse for a smaller historic landmark, enabling a shrinking federal court to maintain a monumental presence. Federal court functions in Mississippi moved from Vicksburg to Natchez in early 2004. GSA worked with officials of both cities to transfer the partially vacant Vicksburg courthouse to the city of Vicksburg and acquire the Greek Revival 1830s Memorial Hall from the city of Natchez. The transaction allowed the city of Vicksburg to consolidate its disbursed offices and open a museum commemorating the Civil War, while the federal government put a prominent Natchez landmark back in public use. Completed in 2007, the relocation demonstrates that transfers of underutilized federal historic property can result in a net preservation gain, with cooperation between federal and local government programs and community advocates.

When reuse by the federal government or outlease to a third party is not possible, GSA's next best preference is to seek alternatives that avoid destroying historic buildings. The historic Oddfellows Hall on the site of GSA's Frank E. Moss U.S. Courthouse annex in Salt Lake City, Utah, is being moved across the street, where it will adjoin other historic row buildings and be sold for private use, with an easement to ensure that the façade is preserved and maintained. GSA's Springfield, Massachusetts, courthouse annex construction project relocated an eighteenth-century row house owned by the Society for the Preservation of New England Antiquities to a nearby location adjoining another eighteenth-century house, placing the isolated residential structure in a more historically appropriate setting.

Prior to acquiring sites containing historic buildings, GSA first encourages agencies to consider reuse options. Nevertheless, there will be times when alternative sites will not meet agency needs, relocation is not possible, and retention is cost prohibitive or not feasible for other reasons. Often, properties in declining central business areas have been allowed to deteriorate in anticipation of demolition and redevelopment. Historic buildings in seismic zones also face costs for structural upgrades to meet seismic codes. These circumstances conspired against reuse of a 1913 hotel on the adjoining annex site for expansion of the federal courthouse in San Diego, California. To help the courts envision how the historic hotel might be incorporated into a new complex, GSA commissioned a simulation showing how the massing of the four-story hotel could relate to a courthouse tower, with an animated walk through a restored hotel lobby to the new building. However, the project's formidable operational, structural, and security challenges could not be overcome within the project budget.

INTEGRATING GSA'S PORTFOLIO AND STEWARDSHIP STRATEGIES

GSA began working toward its portfolio strategy in the early 1990s with the National Performance Review. Initial efforts to improve PBS's fiscal performance concentrated on eliminating nonrevenue-producing space and giving preference to use of government-owned space over leased space. GSA overhauled its rent-pricing policy to pass above-standard costs, such as those required to meet the specialized needs of federal courts and border stations, to the tenant agencies requesting them. However, these pricing changes enabled GSA to recoup leasing and new construction costs, but not necessarily to recoup all GSA costs for investing in government-owned space.

GSA's 2001 Restructuring Initiative categorized buildings as performing, underperforming, and nonperforming using quantitative measurement methods. Nonperforming and underperforming buildings were placed on GSA's Portfolio "watchlist." Each watchlisted building was then examined and a "workout" strategy was developed for rectifying the building's performance or disposing of the property.



ACCESSIBILITY IMPROVEMENTS
IN THE U.S. CUSTOM HOUSE
IN PORTLAND, MAINE, WILL
ENABLE CURRENT TENANTS TO
REMAIN IN THE BUILDING, A
NATIONAL HISTORIC LANDMARK.

U.S. CUSTOM HOUSE
PORTLAND, ME, 1867-1872

**FIVE KEY MEASURE THRESHOLDS
DENOTING POOR PERFORMERS:**

VACANCY RATE
GREATER THAN 10 PERCENT

RENTAL RATE
LESS THAN MARKET RATE

CUSTOMER SATISFACTION
LESS THAN 60 PERCENT

REPAIR/REPLACEMENT NEEDS
GREATER THAN 30 PERCENT OF FUNC-
TIONAL REPLACEMENT VALUE

FUNDS FROM OPERATIONS¹⁰
LESS THAN \$0.00

The strategy initially evaluated the performance of each property on five key measures, with the following thresholds denoting poor performers:⁹ vacancy rate is greater than 10 percent; rental rate is greater than market rate; customer satisfaction is less than 60 percent; repair/replacement needs are greater than 30 percent of Functional Replacement Value; and funds from operations¹⁰ are less than \$0.00.

Results of this analysis place buildings in one of three performance tiers calling for reinvestment, corrective effort, or disposal as follows:

Tier 1. Strong financial performers for which GSA anticipates a long-term customer need are given priority for long-term retention and reinvestment.

Tier 2. Mixed performers that might be improved with appropriate reinvestment will be considered for capital investments on the basis of projected return.

Tier 3. Poor performers for which future financial prospects remain poor are priorities for third-party reinvestment financing or disposal. Includes some buildings awaiting repair and alteration project completion to restore income stream.

GSA LEGACY VISION

To set priorities and improve the performance of the historic building inventory, GSA's Center for Historic Buildings worked with the Office of Real Property Asset Management to fashion a vision of sound real estate management that also takes into account GSA's stewardship responsibilities under the National Historic Preservation Act. Placing GSA's portfolio strategy within a stewardship framework broadened the financially driven inventory management philosophy to include cultural considerations such as taxpayer investment in a federal presence and public building legacy—especially the monumental buildings and architectural icons symbolizing the role of the government in the daily lives of its citizens.

Toward that end, the offices collaborated in creating a policy paper issued by Commissioner Joseph P. Moravec in August 2002 entitled *Integration of a Federal Legacy Vision with GSA's Portfolio Strategy for Restructuring and Reinvesting in the Owned Inventory*. The policy integrates GSA's stewardship strategy for keeping historic buildings occupied and viable with portfolio management initiatives for financially sustainable management of the agency's federal work space inventory.

The goal of the *Legacy Vision* is to position the government's finest buildings to be the strongest financial performers possible, by taking a second look at historic buildings that are not performing well and exploring specific turnaround measures to make them financially viable. These measures include

- Monitoring and reducing costs of cleaning, maintenance, and utilities;
- Undertaking necessary repairs and improvements to eliminate vacant space;
- Actively marketing historic buildings to fill vacant space, relocating tenants from leased space or nonhistoric federal buildings;
- Supplementing a predominantly federal use with nonfederal use, through outleasing;¹¹ and
- Undertaking required maintenance and minor repairs to minimize deterioration and more costly future repairs.

The *Legacy Vision* acknowledges that GSA will inevitably retain a limited number of buildings—chiefly Legacy properties—on the financial fringe.¹² When disposal is necessary, appropriate legislation, like the public benefit conveyance section of the Federal Property and Administrative Services Act of 1949, provides for transfer controls—including easements, covenants, and agreement procedures for third-party oversight—to ensure that GSA meets its stewardship responsibilities. In such circumstances, GSA seeks donation or conveyance to a responsible steward who is better positioned to devote additional resources to preserve the building.

HISTORIC BUILDING PERFORMANCE

Since the watchlist was established, the Center for Historic Buildings has been tracking nonperformers and underperformers to better understand their shortcomings and identify the most effective turnaround strategies. On the whole, the strongest performers among GSA's historic buildings were large buildings (over 50,000 square feet) located in major metropolitan areas. Weaker performers tended to be smaller buildings located in smaller towns where rent rates were lower. Tier 1 buildings averaged 175,120 square feet compared with Tier 3 buildings averaging 137,505 square feet. Over half of the smaller historic buildings in smaller cities were poor performers being considered for disposal, with high concentrations in the Southeast/Sunbelt and Heartland Regions, especially areas where population has declined, often resulting in greater vacancy and lower market rate rents. Nearly one-fourth of the watchlisted buildings were more than 50 percent vacant.

From 2002 to 2003, forty-four historic buildings moved off the watchlist; 70 percent of those went to disposal, the remaining 30 percent had improved performance. From 2003 to 2004, twenty-three historic buildings moved off the watchlist. Nearly 75 percent of the buildings were upgraded, while only 25

percent were sent to disposal. (On average, watchlisted buildings remained on the list for two years.) By 2006, historic building disposals pending or completed totaled sixty, while an equal number of financially troubled historic properties were upgraded to Tier 1 or Tier 2 status, indicating that regional turnaround efforts were succeeding.

Despite a persistence of Tier 3 buildings in the historic building inventory, the number of buildings moving from Tier 3 to Tiers 1 or 2 is increasing and the turnaround strategies in the Legacy Vision appear to be making a difference. Half of the historic building inventory is now positioned for long-term performance supporting retention and reinvestment, up from an estimated 15 percent in 2003. Also significant is the number of buildings that moved from nonperforming Tier 2 status to either Tier 1 or Tier 2a with anticipated upgrading to Tier 1 status as a result of reinvestment and revenue improvement efforts currently underway.

By 2007, with the restructuring initiative substantially implemented, GSA turned to long-term strategic planning to define the agency's core, or long-term hold, assets while continuing to monitor building performance nationwide, developing exit strategies for nonperforming assets, reinvestment strategies for performers, and cost containment strategies for underperformers.

Seventy-five percent of the historic building inventory is now performing. As monitoring and competition for limited capital investment funds continue, proactive strategies for sustained positive cash flow remain more important than ever.

PERFORMANCE CHALLENGES AND REMEDIES

GSA regions continue to struggle with contradictory customer desires, design directives, and policy goals. In the face of these challenges, GSA's commitment to giving preference to occupancy in historic buildings, as required by the National Historic Preservation Act and Executive Orders 13006 and 13287, offers the best hope for keeping treasured public buildings public. This commitment begins by planning well in advance of prospectus project development to ensure that new construction supplements, rather than replaces, important historic buildings—especially courthouse expansion. Equally important is a commitment to leasing suitable owned historic buildings and applying tenant requirements flexibly to ensure that available historic buildings are not summarily dismissed without appropriate architectural analysis to determine their adaptability to serve new functions.

Often it is assumed that historic buildings are more expensive to own and operate than nonhistoric buildings. Yet recent data on operating costs and targeted reinvestment successes suggests that smaller historic buildings can offer certain financial advantages over economically constructed contemporary

buildings. To start with, historic buildings operate at a notably lower cost than nonhistoric buildings. In 2008 historic buildings represented one-third of the owned inventory and generated one-third of GSA's Federal Buildings Fund revenue, while operating at a cost of only \$4.08 per square foot, 16 percent lower than the inventory's average of \$4.87 per square foot. Smaller buildings require much less in rehabilitation funds, as well. An investment of \$1 million can be sufficient in a small monumental building to undertake critical systems, code compliance, or space improvements needed to retain or secure a tenant. For example, \$4.5 million, matched by \$2.2 million in state and local funding, bought a top to bottom rehabilitation for the U.S. courts at the antebellum Natchez Memorial Hall. In examining the financial health and viability of the monumental inventory, it is important to consider absolute costs as well as commercial performance benchmarks.

A leading cause of high building vacancy has been tenant relocation to leased buildings or new government-owned construction. Relocation vacancies often occur because of tenant desires to expand or consolidate in a single larger building or to take advantage of amenities offered by leased buildings outside of city centers, such as free parking. Negative tenant opinions of declining city centers contribute to the attractiveness of new leased construction outside of city centers—opinions that can be often be changed with effective marketing. In some cases, historic building vacancy can be substantially reduced or avoided by adjusting agency housing plans to give preference to historic buildings, as Executive Orders 13006 and 13287 call on federal agencies to do. This requires identifying federal tenants in both owned and leased space willing to consolidate in GSA historic buildings. Where a diminished federal presence may be too small to support continued housing in federally owned property, an appropriate outlease arrangement may be made to rent out unoccupied space and cover the income gap.

A continued challenge facing GSA-owned historic buildings is the market-based pricing system that provides the revenue for the Federal Buildings Fund. It is difficult to recover repair and alteration costs for small monumental buildings located in depressed markets, since these buildings cost essentially the same to maintain in a poor market as they do in a strong market. There are, fortunately, precedents and limited authorities for charging above-market rent rates for rehabilitation in which agency-specific requirements demand a higher than standard investment level. For example, space that meets the requirements of the Court Design Guide demands specialized lease construction or construction of new federal space that cannot be procured at market rates. GSA and the courts have reached agreement to allow return on investment pricing for repair and alteration meeting Court Design Guide requirements as well as new construction. This action helps “level the playing field” when comparing rehabilitation and new construction options by exploring payback for reuse at higher than market rates, to take into account the cost of

CONSTRUCTED TO HOUSE THE FEDERAL GOVERNMENT'S LARGEST INTERAGENCY MEETING SPACE, THE ANDREW W. MELLON AUDITORIUM BUILDING IN WASHINGTON, D.C., WAS MODERNIZED IN 2002 AS THE CENTERPIECE OF THE ENVIRONMENTAL PROTECTION AGENCY'S NEW CONSOLIDATED HEADQUARTERS IN THE FEDERAL TRIANGLE. SEATING UP TO 2,500 PEOPLE, THE SPACE CONTINUES TO SERVE A VARIETY OF FEDERAL AGENCIES AND ALSO EARNS REVENUE FROM NONPROFIT ASSOCIATIONS AND PRIVATE GROUPS WHO RENT THE AUDITORIUM FOR CEREMONIES, FUND RAISERS, AND OTHER EVENTS.



ANDREW W. MELLON AUDITORIUM
WASHINGTON, DC, 1935

adherence to the Court Design Guide and other customer-specific requirements. Special pricing tools have also been used for remote facilities, such as border stations, where no comparable space exists upon which to base rent. GSA sets the rent rate at these locations to cover operating and repair costs.

Security requirements prompting tenant demands for increased setbacks or sites in less vulnerable locations are another challenge. Sometimes these concerns can be addressed by placing vulnerable activities in protected locations within the building, such as office space adjoining enclosed courtyards. In some instances, security setback requirements can be met through adaptive-use solutions that bring new life to functionally obsolete historic properties in campus settings, such as St. Elizabeth's Hospital in Washington, D.C., a National Historic Landmark that offers a secure, consolidated headquarters for the Department of Homeland Security.

Reconciling the NHPA mandate giving historic buildings preference to the financial performance challenges of historic buildings remains an obstacle that may be met only by tailoring our performance analysis to factor in tangible values not currently captured, such as construction quality, architectural richness, and landmark recognition value. In striving to maintain government space by commercial real estate standards, GSA needs to develop mechanisms that take into consideration important distinctions between government and private business. A sixty-year investment analysis, for instance, which requires pursuing an Office of Management and Budget (OMB) rule revision, would allow GSA to take into account differences in building quality not evident in a standard thirty-year payback analysis. Incorporating such qualitative factors into return on GSA's investment analysis will also help to ensure against the government accepting, in depressed or remote locations, an image that simply reflects surrounding market conditions, in favor of the more permanent, monumental presence already created for the government at substantial public expense. OMB rule modifications may also help to address the challenges of financially troubled historic buildings in weak markets that are fully occupied but unable to charge rents sufficient to support the costs of necessary reinvestment.

TURNAROUND SUCCESSES

By focusing on GSA's most significant assets and regular progress tracking, the *Legacy Vision* is helping to put valuable heritage property back in the black while supporting GSA's restructuring and core assets initiatives to achieve a financially sustainable inventory. A substantial proportion of GSA's financial turnaround successes have resulted from meaningful interventions to restore balance to a building's income: expense ratio, through operating expense reductions, energetic marketing to backfill vacant space, tenant consolidation within buildings to make scattered vacant space rentable, and successful efforts on GSA's

part to pass along building repair or rehabilitation costs through return on investment rent rates. Half of all historic buildings removed from the watchlist during the 2005–2008 reporting period have moved from Tier 3 to Tier 1 or 2a on completion of programmed repair and rehabilitation projects. One-fourth recovered financial viability through rents raised to recover the costs of needed investment. At one of six of the watchlisted historic buildings, asset and property management teams worked together to reduce operating costs to be more in balance with projected income.

Targeted turnaround efforts have enabled GSA to keep important historic buildings occupied and viable. Icon buildings on the road to financial recovery include three exceptionally significant buildings. Egress improvements in New Orleans, Louisiana, will enable vacant space on the building's fourth floor to be occupied. Accessibility improvements in Portland, Maine, will enable current tenants to remain in the building. Lobby restoration in Port Huron, Michigan, enabled the region to secure a long-term occupancy agreement from the courts while restoring inappropriately altered historic spaces.

Security and functional needs threatening continued occupancy of the James A. Walsh U.S. Courthouse in Tucson, Arizona, have been addressed through a series of modest investments combining outlease and Federal Buildings Fund revenues to secure a stable tenant in the bankruptcy courts. Recognized in a 2008 Governor's Heritage Preservation Honor award, the project restored the building's inappropriately altered courtroom and exterior during the course of rehabilitation, uncovering skylights and replacing 1950s aluminum windows with replicas of the 1928 originals, engineered to meet current blast resistance requirements.

Four architecturally exceptional buildings facing occupancy-related performance challenges are the subject of focused reuse studies and intensive marketing efforts. GSA's West Coast regional office has undertaken a series of feasibility studies to explore reuse options for the architecturally distinguished Federal Building at 50 United Nations Plaza in San Francisco's National Historic Landmark Civic Center District. One option under consideration is relocation of GSA's regional headquarters office to the classical revival icon. GSA's Midwest office secured an anchor tenant to backfill the 1915 Neoclassical Minneapolis Federal Building, using graphic simulation to market the space as it will appear with suspended ceilings removed to expose the buildings elegant barrel-vaulted ceilings and tall arched windows. GSA's New England regional office is exploring rehabilitation options to assist in making the 1836 National Historic Landmark U.S. Custom House in New Bedford, Massachusetts, occupiable as quickly and affordably as possible. At the Alexander Hamilton U.S. Custom House in New York City, aggressive marketing efforts have substantially reduced the building's nonrevenue-producing space and hold promise for full occupancy in the near future.

CITY POST OFFICE REUSE OFFERS CONVENIENT
EXPANSION AND PUBLIC RELATIONS BENEFITS

SUCCESS STORY

MAIN POST OFFICE
KANSAS CITY, MISSOURI

WHEN SEARCHING FOR LEASED SPACE, GSA GIVES HISTORIC BUILDINGS FIRST PREFERENCE. GSA'S LEASE OF THE MAIN POST OFFICE IN DOWNTOWN KANSAS CITY, MISSOURI, CONSOLIDATED SCATTERED INTERNAL REVENUE SERVICE TAX PROCESSING OFFICES IN ONE CENTRAL FACILITY, POWERING A NEEDED ECONOMIC BOOST FOR HISTORIC KANSAS CITY WHILE KEEPING A COMMUNITY LANDMARK IN PUBLIC USE. LAND PREVIOUSLY ACQUIRED BY THE U.S. POSTAL SERVICE FOR FUTURE EXPANSION ENABLED IRS TO EXPAND BEYOND THE HISTORIC BUILDING INTO THREE SENSITIVELY DESIGNED NEW WINGS THAT ACCOMMODATE FOUR TO SIX THOUSAND YEAR-ROUND AND SEASONAL EMPLOYEES. TO CONSERVE ENERGY, THE ANNEXES ARE DESIGNED SO THAT AREAS OCCUPIED BY SEASONAL EMPLOYEES CAN BE CLOSED WHEN TAX FORM PROCESSING IS COMPLETED EACH YEAR.

U.S. POST OFFICE
KANSAS CITY, MO, 1933





PROMOTING URBAN LOCATION AND REUSE

Executive Order 13006 calls upon federal agencies to “utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in our central business areas.” In 2000 and early 2001, GSA’s Center for Historic Buildings, Center for Urban Development, and Rocky Mountain Region collaborated with the National Trust for Historic Preservation, the American Institute of Architects Historic Resources Committee, and local preservation groups to provide onsite E.O. 13006 training at each of GSA’s eleven regions. The half-day training sessions focused on how to overcome common E.O. 13006 challenges, such as compliance with GSA accessibility and safety requirements, tenant preferences for suburban amenities such as free parking, and negative perceptions about economically depressed center city locations. Executive Order 13006 guidance is now included in the Center’s online compliance guidance for realty specialists, regional training, and GSA online leasing tools such as e-lease and standard solicitations.

In the wake of the 2001 training, GSA achieved several important E.O. 13006 successes, such as the reuse of the Boyle Furniture Warehouse in Ogden, Utah, the nineteenth-century Boys Club building in Roxbury, Massachusetts, and the Strawbridge Department Store building in Philadelphia, Pennsylvania, detailed above under Leasing. Rising new construction costs are also helping to encourage GSA to promote using what we own first. GSA’s Southeast/Sunbelt region set an example for other GSA offices by relocating its headquarters to the historic Martin Luther King, Jr., Federal Building in 2001. GSA’s Pacific Rim office is exploring the possibility of relocating to the vacant Beaux Arts office building at 50 United Nations Plaza in the heart of San Francisco’s Civic Center.

Recent E.O. 13006 successes include the 2005 acquisition of historic commercial buildings adjoining GSA’s Elbert P. Tuttle U.S. Court of Appeals Building in Atlanta, Georgia, to house expanding federal courts, the 2007 Internal Revenue Service consolidation at the historic Main Post Office in downtown Kansas City, Missouri, and GSA’s 2008 acquisition of the nineteenth-century Hannah Houses in Mobile, Alabama, as part of the city’s new federal courthouse complex.

General Services Acquisition Regulation (GSAR) clause 552.270-2, published in September 2004, revised GSA’s historic leased building price preference clause to reflect the E.O. 13006 tiered hierarchy of consideration. The new clause continues the 10 percent preference for historic buildings, but also gives a price preference of 2.5 percent for undeveloped sites within historic districts, which are given second consideration after historic properties within historic areas. Historic properties outside of historic districts are given third consideration and a 10 percent price preference.

AT THE FORMER NATIONAL SEMINARY IN FOREST GLEN,
MARYLAND, ACQUIRED BY THE U.S. ARMY DURING
WORLD WAR II FOR USE AS A REHABILITATION FACILITY,
HISTORIC BUILDINGS WERE SAVED BY INCLUDING
LAND IN THE TRANSFER PARCEL TO ACCOMMODATE
NEW, REVENUE-GENERATING CONSTRUCTION TO OFFSET
DEVELOPER COSTS TO STABILIZE AND RESTORE THE
HISTORIC DETERIORATED STRUCTURES.



NATIONAL SEMINARY
(WALTER REED ARMY MEDICAL CENTER ANNEX)
FOREST GLEN, MD

VANDALISM AND A SERIOUS FIRE FOLLOWING GSA'S SALE OF THE 1826 NAVAL ASYLUM IN PHILADELPHIA, PENNSYLVANIA, A NATIONAL HISTORIC LANDMARK, UNDERScoreD THE IMPORTANCE OF PRESERVATION COVENANT ENFORCEMENT. COMMUNITY LITIGATION LED TO DEVELOPER-FUNDED RESTORATION OF THE BUILDING, REOPENED IN 2005 AS LUXURY CONDOMINIUMS.



PHOTO: GSA
U.S. NAVAL ASYLUM,
PHILADELPHIA, PA, 1826

Further refinement of GSA's space acquisition policy under consideration will reconcile the goals of E.O. 13006, promoting historic buildings and districts; E.O. 12072, promoting urban central business area location; and the Rural Development Act, promoting relocation to rural areas to encourage economic development in depopulating regions. GSA's 2004 GSAR update eliminated the historic building price preference in space acquisitions within towns and cities below the Office of Management and Budget metropolitan population threshold of 50,000. This apparent conflict between urban and rural economic development goals may be resolved by supporting the broader National Historic Preservation Act (NHPA) mandate to give first consideration to historic property by applying the historic building preference to any space acquisition in which locating in historic property is an option. Taking application of the E.O. 13006 locational hierarchy a step further to support reuse of historic buildings *and* town or city center infrastructure reconciles the economic development and preservation goals of E.O. 12072, the Rural Development Act, and E.O. 13006, which supports National Environmental Policy Act and Energy Policy Act conservation goals.

Acquisition of sites for lease construction or new federal construction can present greater challenges to reuse and urban location than leases involving existing buildings, since the simplest approach to meeting client requirements in new construction is usually to clear the site and begin with a clean slate. Embracing NHPA and E.O. 13006 will continue to require GSA to be imaginative in meeting space requirements, aggressively promoting city center locations and construction alternatives that integrate existing historic buildings into space programs for new construction. Conversely, embracing E.O. 13006 will also require GSA's customers to apply their own space requirements flexibly. Where tenant agencies are unable or unwilling to reuse historic buildings, only sites that do not contain historic buildings should be selected, rather than acquiring and destroying historic buildings that might be reused by others.

Among today's most formidable challenges to reusing historic buildings not already owned by the federal government are tightened security setback requirements that cannot usually be met at urban historic properties without investing in costly blast protection. However, conferences sponsored by the National Park Service, the American Society of Landscape Architects, and the American Institute of Architects, along with publications such as the National Capital Planning Commission's master plan for security along Pennsylvania Avenue, continue to exert pressure on federal agencies to examine each circumstance individually, enabling reuse of historic buildings where reasonable security protection can be achieved within an urban streetscape context.

Communities that enthusiastically welcome a federal presence also help to tip the scales toward agency support for E.O. 13006 goals. Agencies who do lease space in historic districts often receive such a warm community response that they will seek out another historic building to meet subsequent space needs.

STEWARDSHIP PLANNING FOR HISTORIC PROPERTIES LEAVING THE FEDERAL INVENTORY

When market conditions, demographics, long-term government space needs, and community interest do not support retention of property in the federal inventory, GSA works with state and local governments and community groups to identify appropriate uses and reliable stewards. Stewardship commitment must be demonstrated not only with respect to protecting historic character, but also by providing evidence of the financial resources sufficient to assume long-term care of a property and provide for continued public access, when appropriate.

Smaller communities have a strong record of commitment to their historic federal buildings, perhaps because these buildings stand out amid a limited number of public landmarks. Noteworthy success stories include Asheville, North Carolina's 1929 Grove Arcade confiscated by the Department of Defense in 1942 to support the war effort and reopened in 2002 as a mixed-use public arcade after fifty-five years of federal ownership. Moundsville, West Virginia's 1914 federal courthouse, purchased by Wheeling's Robinson family in 2002 with the hope of stimulating the local economy, has assumed a new prominence as law, health, and educational offices, including use as a counseling center for Federal Emergency Management Agency-supported Project Recovery following 2005 flooding. A recent midsized city success story is GSA's transfer of the U.S. Post Office and Courthouse in Las Vegas, Nevada, to the City of Las Vegas in 2002. The city committed itself to restoration of the building for new public use related to the city history and culture, at an estimated cost of \$50 million. Ironically, the restored courthouse is scheduled to reopen in 2010 as a "mob museum" focusing on the role of organized crime in spurring the city's mid-twentieth-century growth and establishing its identity.

Despite these and many other success stories, over the years it has become increasingly evident that memorandums of agreement (MOAs) and covenants alone do not always provide sufficient protection, evidenced in the deterioration of historic bungalows from the La Vista Del Arroyo Hotel property in Pasadena, California, sold to a developer when the main hotel building was restored for reuse as the U.S. Court of Appeals and by the burning of the National Historic Landmark U.S. Naval Asylum in Philadelphia after it was sold for commercial redevelopment and vandalized repeatedly during a period of extended vacancy.

GSA's first in-depth disposal compliance policy and guidance document, jointly prepared by the Center for Historic Buildings, Office of Disposal, and GSA General Counsel, provides up-to-date guidance on each step of the disposal process, including innovative transfer provisions and mitigation measures that GSA has developed to reduce these and other stewardship risks associated with historic property conveyance.

Released in early 2008 and now available online and as a spiral-bound handbook, the guidance addresses a variety of historic property circumstances and goals, with sample documents illustrating each approach described in the guide. Highlights, along with noteworthy examples serving as sources of sample documents contained in the guide, follow.

Decisions to retain or excess historic property are portfolio management responsibilities, requiring Regional Historic Preservation Officer (RHPO) involvement, that come under NHPA Section 110, for which consultation does not mandate public participation as required in Section 106 consultation. This distinction enables GSA to initiate informal discussion with State Historic Preservation Officers (SHPOs) when financial performance challenges or other viability problems raise the possibility of disposal, without introducing risk of political fallout or a speculative real estate response that might otherwise result from premature public disclosure of a historic property transfer. GSA failure to consult SHPOs until after excess decisions or transfer arrangements have been made precludes meaningful opportunity to discuss alternatives, engendering mistrust and exposing GSA to litigation risk.

Awaiting a definitive retention or transfer outcome is neither necessary nor desirable during early discussions about a property's uncertain future. Informal SHPO interaction is best initiated by the RHPO when it is first evident that the future of the property is in doubt. Discussions should, in any case, begin prior to substantial completion of a retention/disposal study, while options remain open. In particularly sensitive cases, SHPO and Advisory Council on Historic Preservation (ACHP) staff may be requested to sign a nondisclosure agreement conveying the need for confidentiality to protect government interests.

Under ADM 1020.2, agencies excessing property to GSA for disposal must assume responsibility for due diligence required to comply with Section 106, such as photographic or descriptive documentation, National Register nomination, and development of preservation plans and other stewardship documents. To ensure that GSA does not assume financial liability for transfer expenses associated with other agencies' decisions, such requirements should be fulfilled by the responsible agency prior to GSA acceptance of the property or, at the least, stipulated in an agreement affirming the agency's commitment to meeting such requirements in a timely manner prior to transfer.

Transfer transactions, including the development of protective documents and the transfer process, are Section 106 undertakings requiring public participation and typically concluding in a MOA. The agreement outlines transfer processes specific to the property and its preservation, referencing relevant authorities, covenants, and other legally binding documents protecting the property and its character-defining qualities. RHPO involvement with the regional disposal program ensures that transfers of historic property

are consistent with GSA preservation policy and comply with federal preservation laws and regulations. RHPOs also participate in transfers involving highly significant or politically sensitive historic property exceeded by other agencies.¹³

GSA's stewardship responsibility under the NHPA is to explore reuse options and tailor transfer processes and documents, when reuse is not possible, to the property's particular preservation needs. Most historic building transfers use either the Public Benefit or Monument transfer provisions of GSA's disposal authority under U.S.C. Title 40, Section 550. Public benefit disposals include transfer to government entities or nonprofit institutions for recreational, park, educational, or other public purposes, including government offices. These authorities allow transfer at below market value to provide public benefits, including preservation and continued public access. Monument transfers also allow reversion of transferred properties to government ownership should a transferee fail to preserve the property as stipulated in the transfer agreement.

GSA has never tested the enforceability of its covenants or reversionary transfer authority. Interventions for failure to abide by covenants have been limited to correspondence encouraging transferees to take stewardship responsibility. GSA staff and outside preservation groups are not always aware of the limited authority covenants actually carry. In some states, covenants do not survive subsequent conveyances. Covenants offer limited ability to provide for protection and public access in negotiated sales and cannot ensure, as leases can, that excess profits are invested in maintenance and repairs. Lender rights may even hinder GSA's ability to encumber a property with restrictions.

A recent increased use of Monument transfer authority (i.e., allowing reversionary rights) may reflect SHPO interest in creating more enforceable preservation requirements than are offered by covenants alone. Or it may reflect growing recognition within regional disposal programs that GSA's administrative structure for handling real estate is better suited to supporting a reversion and secondary transfer than to enforcing covenants, should transferees fail to abide by MOA stipulations.

In addition to using appropriate authorities to ensure that historic properties are transferred to reliable, committed stewards, GSA is responsible for developing all transfer documents providing protection against inappropriate alteration or destruction of a historic property. The extent of effort GSA invests in devising a preservation strategy for historic property transfers is generally proportional to the property's significance and vulnerability, as well as public interest in the property.

Through high-profile disposals involving National Historic Landmarks such as Governor's Island, the San Francisco Mint, and the St. Louis Post Office and Custom House, GSA has developed model procedures to better ensure that exceptional historic properties are transferred to capable stewards for compatible uses, with oversight provisions to address future circumstances that might introduce unexpected stewardship challenges and risks. The processes include provisions for ongoing third-party oversight by preservation oversight agencies such as the SHPO, ACHP, and National Park Service National Historic Landmark program.

For locally significant properties, continuing oversight can be provided through transfer of an easement overseen by a local nonprofit organization, as GSA is exploring for long-term oversight of the Oddfellows Hall relocated from GSA's Salt Lake City Courthouse annex site. GSA also has the authority to retain easements, such as the easement providing stewardship oversight of the Clara Barton's Missing Soldiers Office in Washington, D.C., to be maintained as a museum within a residential redevelopment.

Historic properties at greatest risk remain those transferred by public sale, usually for commercial development, including historic buildings to be preserved on redevelopment sites, as was the case with Pasadena's La Vista Del Arroyo Hotel bungalows and the U.S. Naval Asylum—transfers in which preservation was ancillary to new development, and not a principal interest of the transferee. The Center for Historic Buildings, Office of Portfolio Management, Office of Disposal, and GSA Counsel have been working together to fine-tune GSA's disposal consultation process and explore solutions to the limited protections offered by covenants and, in particular, sale transfers of historic property.

Possible refinements include a two-step sale transfer process for Legacy buildings, when opportunities do not exist for public benefit transfer or donation of protective easements with third-party oversight. A first-step review would assess the transferee's stewardship track record and the consistency of the proposed use with Secretary of Interior Standards for Rehabilitation, qualifying criteria directly relating to NHPA mandates. Highest offerors could then be selected from qualified transferees. Whether GSA has the authority to mandate a long-term financial commitment, as we do with lease contracts, is uncertain.

Easements offer the advantage over covenants of providing for ongoing preservation oversight. They can be used to preserve exteriors, defining alterations subject to external review, preserve specific spaces, or provide for limited public access to significant areas, such as the Clara Barton Office in the Washington, D.C., Square 457 redevelopment. They can also eliminate the need for lengthy Section 106 consultation to

develop and reach agreement on a MOA, since easement arrangements generally result in a determination that the transfer will have no adverse effect on the historic property. Easements are best held by states or nonprofit groups with programs in place to enforce the easement through periodic inspection. Where this is not possible or practical, GSA has the option of holding the easement and retaining enforcement rights—more practical for easily accessible properties than remote ones that GSA does not have the ability to closely oversee. Easements can also include a reversionary clause if the property is not used and cared for in accordance with the deed.

OLD U.S. MINT, SAN FRANCISCO, CALIFORNIA

GSA and consulting parties developed a precedent-setting Programmatic Agreement (PA) and related transfer documents to ensure the continued preservation of the Old U.S. Mint, a four-story National Historic Landmark located in San Francisco, California. The building has been vacant since the U.S. Department of Treasury declared it excess in 1996, after damages sustained in the Loma Prieta earthquake compelled the federal government to bring the building up to current standards for protection against seismic hazards. Cost estimates to seismically strengthen the brick chimneys and granite building ran as high as \$30 million, although it is now expected that new reinforcement technology such as center core anchoring could significantly reduce the cost of seismic retrofit to about \$15 million.

Constructed between 1869 and 1874, the Greek Revival building became one of the principal mints in the United States during the nineteenth century and the chief federal depository for gold and silver mined in the West. Designed by Alfred B. Mullett, it is one of the few downtown buildings to survive both the 1906 earthquake and fire and the 1989 Loma Prieta earthquake.

Sources of contention surrounding Section 106 consultation for the transfer included preservationists' reservations concerning the City of San Francisco's stewardship reliability in the wake of criticism resulting from city-funded demolition of ornamental interior spaces in the Beaux Art public library during an adaptive use project to house the Asian Art Museum. Also debated were the symbolic and practical implications of federal disposal of National Historic Landmark property constructed for public use, since protections afforded the property under the NHPA do not apply to local governments and private entities.

In the absence of a defined reuse, the PA focused on the process for selecting a developer, use, and oversight of the building's redevelopment and long-term care. Under the PA and related transfer documents, use preference will be given to uses offering public access and benefit, particularly to uses incorporating a museum. A consultation process resembling Section 106 compliance review has been established to manage long-term change. The SHPO and the ACHP will provide third-party oversight of major alterations. San Francisco currently anticipates commercial redevelopment, incorporating a museum.

OLD POST OFFICE AND CUSTOM HOUSE, ST. LOUIS, MISSOURI

Redevelopment and disposal plans for the Old Post Office and Custom House introduced similar concerns to those raised by the transfer of the Old U.S. Mint. Largely vacant following construction of the nearby Thomas F. Eagleton U.S. Courthouse, the building had been operating at a six-figure loss for some time when Webster University expressed interest in establishing a campus in downtown St. Louis. GSA then initiated what would prove to be an arduous process to formulate an outlease redevelopment plan to ensure the full occupancy and long-term financial viability of the National Historic Landmark constructed between 1873 and 1884.

The granite building, with ornamental cast-iron interior supports and large, elaborate courtrooms, contains Daniel Chester French sculptures that are among the most significant artworks in GSA's collection. The custom house is situated dramatically on a raised platform in a focal point of historic downtown St. Louis, an area referred to locally as Post Office Square, the locus of city and state revitalization efforts.

When the developer's prospective anchor tenant, the Missouri State Courts, announced that funding for state occupancy at higher than market rates dictated by the project costs would require equity in the building, the preservation focus shifted to creating transfer mechanisms for long-term preservation oversight similar to those established in the Old Mint PA.

Noteworthy achievements of the transfer agreement include provisions for third-party review by the National Historic Landmarks program of major alterations or changes of use subsequent to the redevelopment, quality control standards for design and construction affecting historic materials, allowances for public access to spaces originally constructed for public use, and casualty provisions delineating consulting party responsibilities in resolving the appropriate response to catastrophic damage.

GSA'S SALE OF THE 1853 BUILDING THAT ONCE HOUSED CLARA BARTON'S CIVIL WAR-ERA LIVING QUARTERS AND OFFICE OF MISSING SOLDIERS INCLUDED A PRESERVATION EASEMENT OBLIGATING THE NEW OWNER TO FUND THE BUILDING'S STABILIZATION, FACADE REPLICATION, CODE COMPLIANCE, AND LONG-TERM MAINTENANCE. THE EASEMENT GIVES GSA CONTINUED STEWARDSHIP CONTROL OF SPACES CLARA BARTON OCCUPIED, ALONG WITH FIRST FLOOR AREAS TO USE FOR INTERPRETIVE PURPOSES AND MUSEUM SUPPORT FUNCTIONS.



CLARA BARTON'S OFFICE OF MISSING SOLDIERS,
WASHINGTON, D.C., 1853

SQUARE 457 (CLARA BARTON OFFICE), WASHINGTON, D.C.

Square 457, located at 437-441 Seventh Street, N.W. in Washington, D.C., is one of a number of commercial properties that GSA acquired when Congress mandated sunset provisions for the Pennsylvania Avenue Development Corporation (PADC), established in the late 1960s amid growing concern that the grand artery of the nation's capital was no longer an appropriate backdrop for inaugural parades and other ceremonial events of the nation. PADC's jurisdiction extended from Pennsylvania Avenue to the city's historic commercial district including Washington's Chinatown. PADC's legacy includes restoration and reuse of the Willard Hotel, Gallery Row, and other historic buildings; \$1.5 billion in private-sector investment; and resurgence of the area as a residential neighborhood, now referred to as the Penn Quarter.

GSA's 1998 solicitation for commercial redevelopment of Square 457C, one of the last remaining development parcels in the area, included provisions requiring restoration, including substantial reconstruction of one historic facade and preservation with public access to a space Clara Barton used as an office during

the 1860s. Transfer provisions include a government easement on the facades and Clara Barton's office, where nineteenth-century artifacts such as clothing, papers, and a sign identifying Room 9 as the Missing Soldiers Office, were discovered in November 1997. Barton, who later founded the American Red Cross, used the office as a base for providing medical assistance and supplies to wounded soldiers during the Civil War, and at President Lincoln's request, provided assistance to families trying to locate missing Union soldiers. Clara Barton's rooms are being restored and interpreted to serve as museum space within the redeveloped block of historic row buildings now fronting a 460-unit luxury condominium complex that developer JPI, Inc., named the Clara Barton.

DEPOT, MIDDLE RIVER, MARYLAND

Effective marketing maximizes value for fair and competitive sale while reinforcing preservation goals by giving prospective bidders realistic expectations about what is expected of them. GSA's preservation easement for the Middle River, Maryland, depot included a question and answer appendix to help developer-bidders anticipate what kinds of alterations would be permissible in adapting the building to serve new uses. Significant for its structural engineering technology, the building features an innovative roof truss system that created extensive open spans for the manufacture of war planes. Positive publicity and marketing documents emphasizing the property's historic significance and promising location led to its sale at a substantially higher price than originally anticipated, in spite of easement restrictions.

U.S. NAVAL ASYLUM, PHILADELPHIA, PENNSYLVANIA

Because profit, rather than preservation, is usually the principal redevelopment driver, public sale transfers tend to pose greater risks to historic buildings than public benefit transfers, especially when preservation is ancillary to planned new construction. These risks increase when the highest and best use of a property would require major alteration or when development constraints do not support the financial investment required for preservation.

A major reuse project planned for the NHL Naval Asylum in Philadelphia, Pennsylvania, languished for over fifteen years in the hands of private developers and became the subject of civic controversy and litigation when William Strickland's Biddle Hall, the most significant building on the site, suffered continuing vandalism and neglect, culminating in a roof fire in 2003 causing serious damage that put the future of the building in doubt. Fortunately, under community pressure to enforce the MOA, damaged areas were reconstructed in kind at the developer's expense as part of a plan to rehabilitate the building as condominiums and the centerpiece of a townhouse complex. Naval Square opened in 2005 with the parade ground of green space retained in front of Biddle Hall and a pedestrian-scaled complex of sympathetic brick row house condominiums set as a backdrop to the historic structure. The near loss underscored the importance of stewardship accountability and enforcement.

**WALTER REED ARMY MEDICAL CENTER ANNEX
(NATIONAL SEMINARY), FOREST GLEN, MARYLAND**

Transfers involving very deteriorated or damaged historic properties usually require a revenue-generating redevelopment component, or public funds commitment, to underwrite preservation costs. At the former National Seminary in Forest Glen, Maryland, seized during World War II for use as a U.S. Army rehabilitation facility, historic buildings at risk were saved by including land for redevelopment in the transfer to support stabilization and restoration of the deteriorated structures. The agreed-upon reuse program includes provisions for public access and interpretation.



EFFECTIVE MARKETING GUIDES STEWARDSHIP EXPECTATIONS

SUCCESS STORY

DEPOT MIDDLE RIVER, MARYLAND

SIGNIFICANT FOR ITS STRUCTURAL ENGINEERING TECHNOLOGY, GSA'S MIDDLE RIVER, MARYLAND, DEPOT WAS ORIGINALLY CONSTRUCTED IN 1941 AS THE GLENN L. MARTIN COMPANY PLANT NO. 2. THE STRUCTURE FEATURES AN INNOVATIVE ROOF TRUSS SYSTEM CREATING EXTENSIVE OPEN SPANS FOR THE MANUFACTURE OF B-26 BOMBER PLANES. GSA'S REQUEST FOR PROPOSAL PACKAGE INCLUDED A QUESTION AND ANSWER APPENDIX TO HELP DEVELOPER-BIDDERS ANTICIPATE WHAT KINDS OF ALTERATIONS WOULD BE PERMISSIBLE FOR ADAPTING THE BUILDING TO NEW USES. THE GUIDANCE, ALONG WITH GSA'S POSITIVE PUBLICITY EMPHASIZING THE PROPERTY'S SIGNIFICANCE AND PROMISING LOCATION, LED TO ITS SALE AT A SUBSTANTIALLY HIGHER PRICE THAN ORIGINALLY ANTICIPATED, EVEN WITH EASEMENT RESTRICTIONS.

GLENN L. MARTIN COMPANY PLANT NO. 2
MIDDLE RIVER, MD, 1941



CARE AND TREATMENT OF HISTORIC BUILDINGS

Most federal National Historic Preservation Act (NHPA) compliance centers around Section 106—which establishes requirements for project planning, external review, and public participation to avoid, or at least minimize, adverse effects on cultural property resulting from federal activity—and Section 110—which requires agencies to identify and develop programs and plans to preserve cultural property in their care. Federal undertakings governed by Section 106 tend to generate the greatest public interest. As a result, for many federal programs Section 106 and the NHPA are synonymous, and the principal focus is on simply executing the compliance process requirements rather than using the process to substantively guide project outcome.

While from a litigation standpoint a focus on process over outcome may make sense, such a narrow view obscures the higher purpose of the NHPA to encourage preservation by creating a framework for thoughtfully approaching decisions affecting cultural property.

GSA encourages its project teams and decision makers to exceed rote compliance with the prescriptive provisions of the NHPA to embrace the spirit of the law and related directives by creating internal tools, training, recognition programs, and procedures that promote good stewardship. Since 2005, GSA has achieved several major successes toward that end:

- An accelerated program to complete all outstanding National Register nominations;
- Completion of GSA's first guidance publication for disposal of historic property;
- Expanded online support for GSA associates and project teams;
- Improved Section 106 compliance with the increased professionalism of GSA's preservation program staff, establishment of an Advisory Council on Historic Preservation (ACHP) liaison position providing an ACHP staff member dedicated to GSA project review, and GSA-focused Section 106 compliance training; and
- Completion of most major milestones in GSA's ten-year Modern-Era Buildings Initiative.

Continuing compliance challenges include tenant-driven space requirements that preclude or discourage use of historic buildings and financial constraints of smaller historic buildings in real estate markets that do not generate sufficient revenue for needed reinvestment.

Compliance improvement priorities include

- Promoting historic building viability by continuing to work with regions to achieve full building occupancies, maximize revenue, and reduce operating costs;
- Consistently achieving successful repair and alteration project outcomes by assisting regions in procuring preservation services and using the model preservation design scope of work for historic building projects;
- Promoting site selection and lease acquisition approaches that actively support the E.O. 13006 locational hierarchy giving priority to historic areas, reusing historic buildings where possible, and avoiding the acquisition of sites with historic buildings that cannot be reused;
- Consistently initiating early, meaningful consultation for new construction potentially affecting historic buildings; and
- Increasing the online availability of information on archeological study findings and collections.

SECTION 110 COMPLIANCE: IDENTIFICATION AND PRESERVATION PLANNING NOMINATING PROPERTIES TO THE NATIONAL REGISTER

Section 110 requires federal agencies to identify historic resources under their jurisdiction and to establish preservation plans for their long-term care. To ensure against inadvertent destruction of historic buildings, the federal process guiding changes to historic properties requires agencies to consider effects of their undertakings on properties that may be eligible for the National Register, even if a formal eligibility determination has not been made.

Although agencies are required to identify and nominate their historic properties for placement on the National Register, until recently GSA did not have an agency-wide program for doing so. In an environment of limited project funding, investment in studies such as National Register nominations competes with funding for repair and alterations. It seemed reasonable to conclude that limited funds were better spent procuring qualified preservation design teams and construction firms to ensure appropriate repairs

and alterations in historic buildings than rather than invest in nominating properties already protected under Section 106. In 2000, GSA projected that at its then current rate of completing National Register nominations, it would take two hundred years to comply with the requirement. Even at GSA's peak-year 2000–2001 pace of submitting nominations, it would take twenty-five years to nominate the remaining two hundred properties determined eligible or likely to be eligible for the National Register. With an additional sixty-six properties reaching the age of fifty by the end of the decade and many more to follow, the need to establish a program structure for addressing the nomination backlog became clear. Other important reasons to actively pursue National Register designation emerged:

- Only listed properties and Section 111 outlease income earners are authorized to receive project funding from outlease revenue (BA 64);
- Eligibility for preservation project tax credits generally requires listing;
- Listing reduces confusion among GSA associates and clients who do not understand that the same preservation treatment standards apply to eligible, but not-yet-listed, as to listed historic properties;
- Listing increases opportunities for marketing space in historic buildings to prospective tenants;
- Listing creates greater respect for historically significant architectural attributes and greater care in pursuing maintenance, repairs, and alterations; and
- Listing supports new requirements under E.O. 13287 to assess and report on agency compliance with Section 110.

In response, GSA is accelerating designation of its eligible properties, beginning with the not-yet-listed Legacy buildings that most merit retention and reinvestment to remain viable in federal use. A three- to five-year National Register nomination program is now well underway to designate the balance of GSA's National Register-eligible properties awaiting listing. GSA's strategy for dramatically accelerating completion of the effort has been to bundle nominations geographically or thematically, depending on the type of resource, to reduce travel, research, and administration costs.

A collateral benefit of the nomination effort is that it directly supports Section 106 compliance at properties where major changes are anticipated, including dozens of historic border inspection stations, where major alterations are under way nationwide to meet new security requirements. Bundling all forty-eight properties into one multi-property thematic nomination has saved thousands of dollars in research, writing, and travel costs that would have otherwise been incurred undertaking separate research and trips to geographically remote locations across the nation's northern and southern land borders.

Perhaps more importantly, from a property management perspective, is the broader perspective GSA gained by examining the land port facilities as a group. Emerging from the national context study forming

BURGEONING AUTOMOBILE TRAFFIC, IMMIGRATION QUOTAS, AND PROHIBITION-ERA BOOTLEGGING PROMPTED THE GOVERNMENT TO CONSTRUCT A NEW SYSTEM OF INSPECTION STATIONS AT AMERICA'S NORTH AND SOUTH BORDER CROSSINGS UNDER THE 1926 PUBLIC BUILDINGS ACT. FORTY-EIGHT HISTORIC INSPECTION STATIONS ARE INCLUDED IN A MULTI-PROPERTY NATIONAL REGISTER FOR HISTORIC PLACES THEMATIC NOMINATION THAT INCLUDES A QUICK REFERENCE MATRIX WITH THUMBNAIL PHOTOS, HISTORIC DRAWINGS, AND KEY FACTS ON EACH STATION.



PHOTO.
U.S. BORDER STATION, METALLINE FALLS, WA

the core of each nomination is the story of a unique American building type responding to nationwide concern over control of immigration after Congress placed limits on immigration by sea in the early twentieth century. Mounting concerns about the vulnerability of America's land borders escalated during the 1920s with the rise of automobile traffic and bootlegging in response to passage of the Eighteenth Amendment prohibiting the sale or manufacture of alcohol. By the time the stations were constructed in the 1930s, repeal of the Amendment had all but eliminated bootlegging of liquor, but the steadily increasing flow of automobile traffic justified continued concern about smuggling in general.

To aid GSA in setting national preservation priorities and handling ongoing Section 106 compliance for this subset of the historic building inventory, the nomination project also produced an illustrated matrix of historic and descriptive information to serve as a compact guide for quickly comparing properties in relation to the larger group. The matrix has proven such a valuable project planning tool that the Customs and Border Protection agency (CBP), which operates the ports and is responsible for a number of stations not controlled by GSA, quickly adopted the format as a reference guide to historic border properties it controls. GSA and CBP have been collaborating, since the start of the project, to share research with the intent of submitting complementary National Register eligibility findings in a joint effort to meet the government's Section 110 compliance requirements.

GSA is also collaborating with the National Park Service in a thematic National Historic Landmark study focused on the nation's historic custom houses, many of which GSA controls. Many of GSA's finest monumental buildings were constructed as custom houses for processing tariffs on imported goods, the

primary source of revenue for the early republic. GSA is also collaborating with the National Park Service on two additional thematic NHL nominations focused on the civil rights movement and the homefront activity of World War II. The civil rights movement study is examining the significance of GSA's Elbert P. Tuttle Courthouse in Atlanta, Georgia, the John Minor Wisdom Courthouse in New Orleans, Louisiana, and the Frank M. Johnson, Jr., Federal Building and U.S. Courthouse in Montgomery, Alabama, as sites of important civil rights cases for inclusion in the thematic NHL nomination. GSA's 1940 Lafayette Building in Washington, D.C., was recently designated an NHL as part of the homefront NHL nomination.

PRESERVATION PLANNING FOR GSA MODERN-ERA BUILDINGS

Although only a few GSA Modern buildings were designed by recognized Modern masters, some will become National Register eligible when they reach fifty years of age because of important historic events that have taken place within them, because they represent significant architectural types, or because they will meet other National Register eligibility criteria. As the Modern buildings of the Great Society era become cultural vestiges of a past generation, new preservation advocates have emerged, in at least one case completely taking GSA by surprise.

GSA's comprehensive look at its Modern-era portfolio began in 1999 with a lobby and plaza improvement project at the 1965 Byron Rogers Federal Building and U.S. Courthouse in Denver. To GSA's surprise, local preservationists opposed GSA's planned removal of the front colonnade. The building had been recently recognized in a publication on Denver modernism, and GSA found itself embroiled in controversy when Modern-era architecture fans identified the building, designed by local architectural firms James Sudler Associates and Fisher and Davis, as Denver's best example of "New Formalism." The building's potential National Register eligibility called attention to a challenging set of issues that GSA could expect to face again.

The implications were significant: nearly six hundred of GSA's owned properties were constructed between 1950 and 1979. Many already required major reinvestment. GSA needed a policy for balancing financial interests and stewardship goals for buildings of undetermined merit. The resulting ten-year effort, GSA's Modern-Era Buildings Initiative, is being recognized by national and international preservation organizations as a comprehensive model for conceiving and implementing policy on issues of national importance.

To establish a framework for further discussion GSA brought together seventy-five leading architects and preservationists at *Architecture of the Great Society: A Forum on Public Architecture* from the 1960s and 1970s, hosted by Yale University's School of Architecture in December 2000. The symposium and subsequent Blue Ribbon Panel, convened in February 2001, developed thirteen recommendations in four broad categories addressing the aesthetic and performance challenges of GSA buildings from this era: Criteria for Evaluation, Inventory Assessment, Policy and Guidance, and Educational Programs.

GSA's next step was to assess these buildings in progressive detail according to their significance. The effort began with general cataloging to establish a uniform database of Modern-era building information, followed by individual building assessments using the GSA Eligibility Assessment Tool and National Register nominations. Three nominations having received State Historic Preservation Officer concurrence on qualifying as exceptional significant works of architecture are in final review for listing by the Keeper of the National Register.

To integrate building assessment findings into GSA's process for funding repair and alteration projects, capital project requests now include completed eligibility assessments prepared by qualified preservation staff or consultants.

Guiding reinvestment in buildings of varied merit also requires differentiating between levels of significance and quality. Accordingly GSA has devised three levels of treatment, according to eligibility potential:

Tier 1: Exceptionally significant buildings already eligible for the National Register are treated the same as other historic buildings, maintaining integrity through sympathetic design and preservation of character-defining features.

Tier 2: Buildings that are not eligible now but may become eligible at age fifty are treated with care, following Secretary of the Interior Standards, while allowing flexibility to meet contemporary needs. Character-defining qualities are preserved and new work is appropriately integrated.

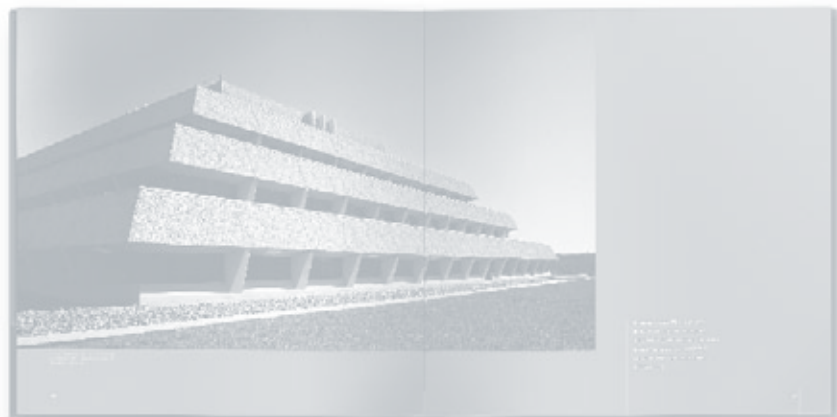
Tier 3: Buildings not likely to ever qualify for the National Register merit a more practical approach emphasizing functionality, cost-effectiveness, and marketability.

GROWTH EFFICIENCY AND MODERNISM: GSA BUILDINGS OF THE 1950S, 60S AND 70S, RELEASED BY GSA'S CENTER FOR HISTORIC BUILDINGS IN 2003, INCLUDES AN ELIGIBILITY ASSESSMENT TOOL TO ASSIST REGIONAL ASSOCIATES IN DETERMINING THE LIKELIHOOD THAT A BUILDING OF THIS ERA MAY BE ELIGIBLE FOR THE NATIONAL REGISTER OF HISTORIC PLACES (NR) NOW OR IN THE FUTURE ON REACHING THE FIFTY-YEAR NR AGE THRESHOLD.



A final component of GSA's Modern-Era Buildings Initiative has been actively promoting awareness and ensuring the availability of tools and information to execute the new process successfully. Toward that end, GSA issued an updated reprint of *Growth, Efficiency and Modernism* in 2005 and continues disseminating it to GSA project teams, decision makers, and preservation stakeholders. In 2007 GSA issued a special set of twelve posters and brochures highlighting its Modern-era buildings. For easy access, all GSA material on Modern-era buildings is online at www.gsa.gov/federalmodernism.

To reach the architectural community and other professionals involved in projects at GSA's Modern-era buildings, GSA promotes its findings and three-tiered treatment approach at high-profile organizational meetings and national conferences hosted by the Advisory Council on Historic Preservation, National Council of State Historic Preservation Officers, National Trust for Historic Preservation, Association for Preservation Technology International, American Institute of Architects, International Council for



Conservation of Monuments and Outdoor Sculpture, and GSA brown bag events. The success of these efforts has been validated in articles published in the National Trust *Forum Journal* and National Building Museum's *Blueprints*.

GSA's comprehensive effort to address the stewardship needs of its Modern-era buildings has achieved a broader benefit of fostering appreciation for buildings of all eras. It has proven effective in promoting context-sensitive design for maintaining the value of all Federal assets.

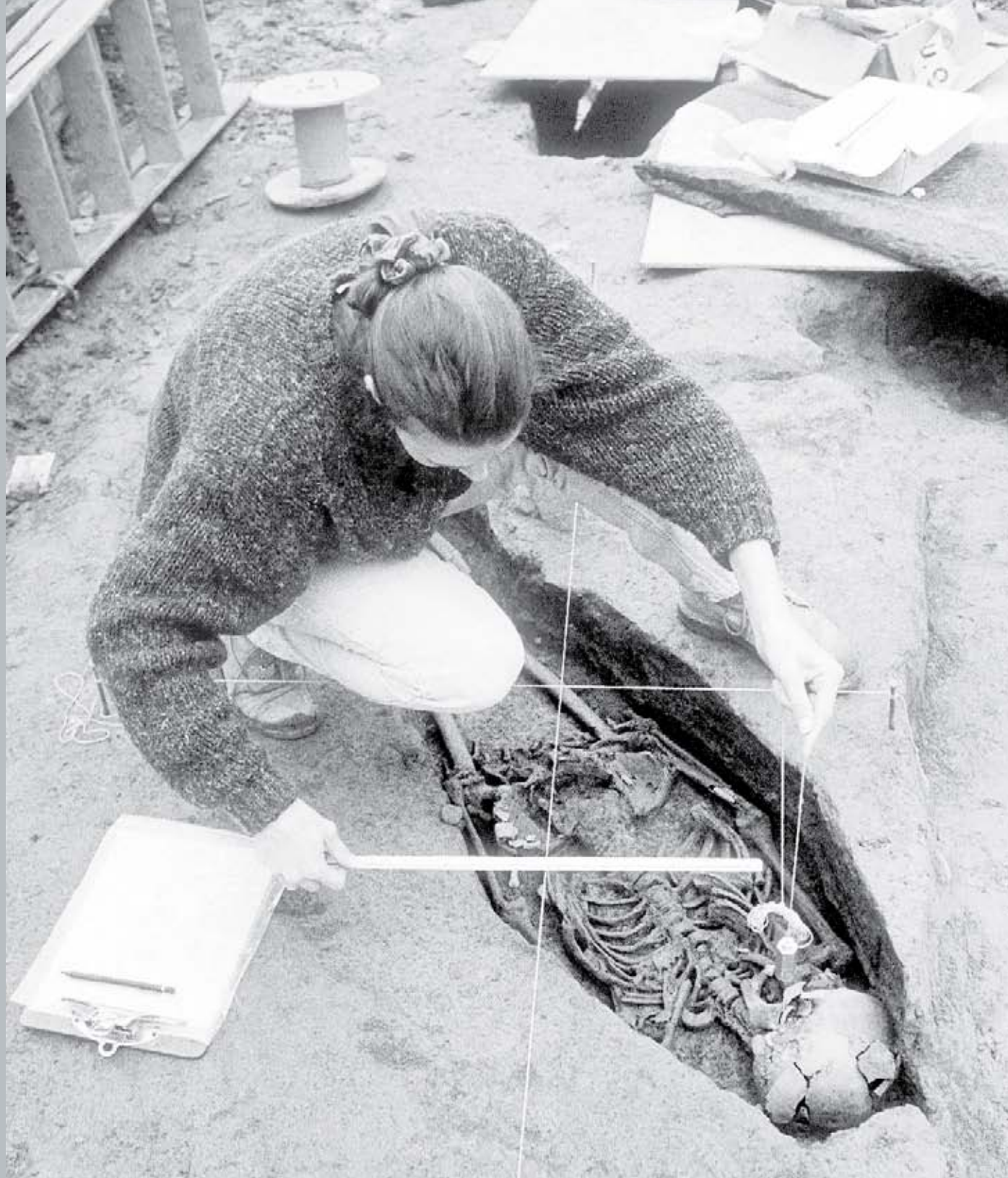
ARCHEOLOGY

Another endemic regulatory challenge requiring a centrally coordinated, programmatic solution is compliance with laws concerning protection of archeological resources. The Archeological and Historic Preservation Act (16 U.S.C. 469-469c) of 1974 and the Archeological Resources Protection Act (16 U.S.C. 470ii-mm) of 1979 require federal agencies involved in federally assisted or licensed construction projects to recover, protect, and preserve significant scientific, prehistoric, or archeological resources being disturbed as a result of a federal undertaking. Artifacts recovered from federal land or as a result of federal activity (excluding human remains and artifacts covered under the Native American Graves Protection and Repatriation Act) remain the property of the federal government in perpetuity.

All ground-disturbing projects raise potential archeological compliance concerns, since artifacts can be present just below the surface. While most construction projects include appropriate provisions enabling identification, assessment, and recovery, some do not. Meeting project schedules and containing costs by avoiding compliance with federal laws places GSA at serious legal risk and is unacceptable. Violations erode GSA's public image, weakening our leverage in subsequent compliance negotiations.

To avoid delays, scopes of work and estimates for repair and alteration projects not large enough to warrant an Environmental Assessment or Environmental Impact Statement should include appropriate research and testing to determine the likelihood of significant archeological resources being present (Phase I). Projects should also include provisions for analysis of sample areas to verify the presence of artifacts, should Phase I trigger the need for additional onsite testing (Phase II). Preliminary consultation with GSA's Regional Historic Preservation Officer, Regional Environmental Officer, and State Historic Preservation Officer can be helpful in learning what may already be known about a site and can sometimes eliminate the need for any further research.

Although extraction of samples is sometimes done during construction, completing site testing prior to construction, as a design-phase study, reduces the risk of unanticipated cost and delay for artifact recovery. The discovery of artifacts during site testing often, but not always, necessitates extensive excavation and artifact recovery (Phase III). When artifacts, human remains, or features indicating past human activity are discovered, one of the roles of GSA's archeological consultant team is to advise GSA on the



INTERPRET ARCHEOLOGICAL
DISCOVERIES FOR PUBLIC BENEFIT

SUCCESS STORY

**AFRICAN BURIAL GROUND
NEW YORK, NEW YORK**

ARTIFACTS AND HUMAN REMAINS RECOVERED FROM THE SITE OF THE AFRICAN BURIAL GROUND, DISCOVERED DURING CONSTRUCTION OF THE TED WEISS FEDERAL BUILDING AT 290 BROADWAY IN LOWER MANHATTAN, REDEFINED THE NATION'S UNDERSTANDING OF SLAVERY AND AFRICAN CULTURE IN COLONIAL AMERICA. GSA COOPERATED WITH HOWARD UNIVERSITY AND THE SCHOMBERG CENTER FOR RESEARCH IN BLACK CULTURE TO CURATE THE ARTIFACTS AND CREATE AN EDUCATIONAL FILM ABOUT THE DISCOVERY AND WITH THE NATIONAL PARK SERVICE TO DEVELOP A MEMORIAL AND INTERPRETIVE CENTER ON THE SITE, WINNING GSA A PRESERVE AMERICA PRESIDENTIAL AWARD IN 2008.

AFRICAN BURIAL GROUND SITE
NEW YORK, NY



DISCOVERY OF THE AFRICAN BURIAL GROUND BENEATH A PARKING LOT AT 290 BROADWAY, NEW YORK, NY RESULTED IN THE MOST SIGNIFICANT ARCHEOLOGICAL RECOVERY IN GSA HISTORY. DESIGNATED A NATIONAL HISTORIC LANDMARK IN 1993, THE ARTIFACTS AND HUMAN REMAINS RECOVERED YIELDED INFORMATION ON THE CONTRIBUTION THAT ENSLAVED AND FREE AFRICAN MEN, WOMEN, AND CHILDREN MADE TO THE ECONOMY, DEVELOPMENT, AND CULTURE OF COLONIAL NEW YORK.

PANEL FROM THE EXHIBIT:
RETURN TO THE PAST TO BUILD THE FUTURE



significance and likely National Register eligibility of the site. In consultation with the State Historic Preservation Officer and, at his or her discretion, the Advisory Council on Historic Preservation, GSA determines whether the significance of the discovery merits further artifact recovery, analysis, and storage. The goals and methodology of recovery and long-term curatorial care are then laid out in an MOA.

GSA's greatest archeological compliance challenge is dealing appropriately with recovered artifacts and archeological research records once projects are completed. The Archeological and Historic Preservation Act and the Archeological Resource Protection Act require the Secretary of the Interior to establish standards for the long-term care of archeological artifacts and to report annually to Congress on the federal archeology program, providing recent research and recovery statistics in addition to details on the care of artifacts previously recovered (for which agencies hold long-term responsibility). Certain specialized artifacts may be transferred to other appropriate federal agencies, such as the U.S. Navy to whom GSA transfers most underwater artifacts, principally remnants of Confederate vessels, which become GSA's responsibility as federal property, once discovered.

GSA compliance with statutes governing the recovery and preservation of archeological artifacts remains inconsistent. GSA has no archeological collections management or information management program. It has no means by which to comprehensively implement a program for compliance because no federal repository able to meet national program needs exists. Neither do uniform requirements for accessioning, cataloguing, loaning, exhibiting, or otherwise using GSA archeological artifacts exist. Furthermore, GSA has little means by which to share these resources with interested researchers.

The Southeast/Sunbelt Region has achieved noteworthy success in securing commitments from established institutions to curate artifacts recovered during construction projects. In regions lacking specialized expertise in archeology, GSA has been less successful in locating organizations willing to curate federal artifacts. Absent GSA oversight of artifact recording, crating, transport, and storage, GSA cannot guarantee the integrity of its archeological collections. Institutions are generally unwilling to accept artifacts that have not been recovered, catalogued, labeled, and packed in a manner consistent with professionally accepted standards.

Artifacts for which interested institutions have not assumed curatorial responsibilities are stored in federal offices and warehouses, some lacking appropriate climate control and security provisions. The Rocky Mountain Region has been exploring the costs and benefits of pooling with state and local agencies to provide consolidated archeological collections management services using currently underutilized GSA warehouse space that would be upgraded to accommodate collections and a management staff.

ARTIFACTS RECOVERED FROM
THE DANIEL P. MOYNIHAN
U.S. COURTHOUSE SITE TELL
A RICH STORY ABOUT THE
WORKING-CLASS RESIDENTS OF
NEW YORK'S MOST NOTORIOUS
EARLY NINETEENTH-CENTURY
SLUM—FIVE POINTS.



EARLY RENDERING OF THE FIVE POINTS
NEIGHBORHOOD OF LOWER MANHATTAN, NY.

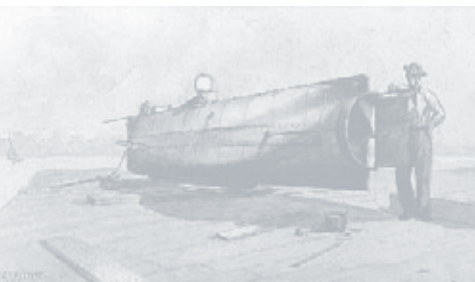
Since GSA has limited storage capability and cannot offer ready access to artifacts for research, project plans and budgets should include specific, long-term recommendations for curatorial care by appropriate entities, such as academic institutions, state historical organizations, or other nonprofit research groups. At a minimum, agreements for long-term curatorial care should ensure that artifacts will be secure from theft or damage and maintained in a climate-controlled environment complying with Secretary of the Interior Standards for storage of archeological artifacts. Early discussion with curatorial institutions is critical to successfully negotiating such agreements, as facilities often have strict requirements associated with recovery, labeling, and crating of artifacts for their protection, identification, storage, and future retrieval.

To determine what approach or combination of approaches will be most cost-effective in the long run and achieve the greatest public benefit value, the Center for Historic Buildings completed an initial study in 2003 to assess GSA's current and future archeological artifact storage needs and to recommend collections management approaches that meet the needs of all GSA regions. Storage alternatives requiring further study include construction, modification, or leasing of regional facilities or a central facility to house artifacts for which no secure or compliant storage alternatives exist. Such a facility or facilities might also house architectural artifacts salvaged and retained for mitigation under project-specific compliance agreements.

Based on the study's conclusion that GSA's artifacts are generally secure and stable, further study on curatorial options has been deferred to focus on GSA's National Register nomination backlog. When the nomination effort is complete, GSA plans to reassess its curatorial options, along with alternatives for making archeological study findings more accessible through additional site-specific homepages and expanded online cataloging. This study and follow-up analysis will

- Determine the approximate volume of artifacts currently under GSA control (or curated by others for GSA) and projected future volume, based on anticipated construction activity;
- Survey GSA archeological holdings nationwide, including collections housed by nongovernment institutions and institutions for which GSA no longer holds transfer records;
- Estimate long-term needs for proper storage and retrieval, including digitizing images of stored artifacts to provide a permanent archival record and better research access; and
- Compare the merits of collections management options currently in place, being explored by GSA, or potentially available, taking into consideration relative costs, long-term reliability, convenience, and public benefit.

ONE OF THE MOST SIGNIFICANT WAR VESSEL DISCOVERIES IN RECENT YEARS WAS THE *H.L. HUNLEY*, THE FIRST SUBMARINE IN HISTORY TO SINK A SHIP IN MILITARY ACTION. FASHIONED FROM A CYLINDRICAL IRON STEAM BOILER, THE CONFEDERATE VESSEL SANK IN 1864 AFTER ATTACKING THE UNION'S *HOUSATONIC*.



Further study will recommend cost-effective ways to establish and sustain collections information management procedures, in compliance with Department of the Interior guidelines, and to simplify GSA compliance with federal archeological activity reporting requirements.

GSA will continue seeking opportunities to ensure public benefit from federal investment in archeological artifact recovery and research. Toward that end, compliance agreements for artifact recovery should include interpretation, dissemination of research findings, and provisions for public display, when possible. Interpretive measures include, but are not limited to, educational videos, indoor and outdoor exhibits, and publication of findings on the Internet or in lay and professional journals. Contract archeologists are encouraged to publish their findings, provided GSA is acknowledged and GSA Regional and Federal Preservation Officers are provided opportunities for review and comment prior to publication.

Important archeological efforts completed during the past decade include research and recovery in association with the Jose V. Toledo Federal Building and U.S. Courthouse rehabilitation in San Juan, Puerto Rico, and, in New York City, the Daniel P. Moynihan U.S. Courthouse at Foley Square in lower Manhattan (Five Points discovery) and the Ted Weiss Federal Building at 290 Broadway (African Burial Ground discovery). Findings from the Five Points and African Burial Ground recovery efforts are available on the Northeast/Caribbean regional Web site.

The San Juan project's archeological excavations yielded 16,000 artifacts, some dating to the sixteenth century. GSA collaborated with a local university to include the community in the interpretation and display of the artifacts. Over 850,000 artifacts recovered from the Foley Square courthouse block tell a rich story about the working-class residents of New York's most notorious early nineteenth-century slum, recently the subject of a fictional film concerned with the historical conflict between the area's Irish and Italian immigrants.

Discovery of the African Burial Ground beneath a parking lot at 290 Broadway, New York City initially believed too disturbed to contain archeological artifacts, resulted in the most controversial, protracted, and significant archeological recovery in GSA history. The artifacts and human remains recovered from the site, designated a National Historic Landmark in 1993, yielded a tremendous amount of information about the contribution that enslaved and free African men, women, and children made to the economy, development, and culture of colonial New York. Under an agreement with community representatives, remains were reinterred in an October 2003 ceremony at the African Burial Ground Memorial Site following a multicity *Rites of Ancestral Return* commemoration. Construction of a permanent memorial and interpretive display for the site was completed in 2007.

FACTORS TO BE CONSIDERED
EARLY IN THE PROJECT:
SITE SELECTION
DISPOSAL
ACQUISITION
DEMOLITION
CHANGES OF USE
EXTERIOR CHANGES
DEPARTURE OF TENANTS
BUILDING ACTIVITIES
PUBLIC ACCESS

UNDERWATER ARTIFACTS

GSA is also responsible for Section 106 compliance associated with sunken Confederate Civil War vessels and associated underwater artifacts that may be eligible for the National Register, including protection from potential harm caused by federal undertakings such as coastal dredging. Underwater artifacts are typically transferred to the U.S. Navy, and curatorial responsibility is assumed by the Navy Historical Center or another institution with appropriate expertise. Agreements should include provisions for reassigning curatorial responsibilities should unforeseen events, such as dissolution or financial difficulties, prevent the curatorial organization from meeting the agreement requirements.

Final curatorial arrangements for one of the most significant war vessel discoveries in recent years were brought to closure in May 2001 with a Programmatic Agreement between GSA, the Navy, ACHP, the South Carolina SHPO, and the South Carolina Hunley Commission detailing terms for the long-term protection of the *H.L. Hunley*. The first submarine in history to sink a ship in military action, the Confederate vessel, fashioned from a cylindrical iron steam boiler, sunk in 1864 after attacking the Union's *Housatonic*. It remained submerged and was not discovered until 1995. GSA transferred responsibility for the *Hunley* to the Navy soon afterward. In August 2000, the submarine was raised from the Charleston Harbor floor for transport to the Warren Lasch Conservation Center. The Programmatic Agreement establishes responsibilities for long-term care of the vessel and permanent exhibition of associated artifacts to benefit researchers and the public.

GSA and the Navy Historical Center have discussed developing an MOA to provide the specialized expertise GSA lacks to deal efficiently and appropriately with the unique challenges these artifacts present. In the meantime, GSA will continue relying on the expertise of the Navy and nonprofit groups to help us meet the specialized curatorial responsibilities associated with underwater artifacts.

SECTION 106 COMPLIANCE: PROJECT DEVELOPMENT AND PUBLIC PARTICIPATION

Most compliance difficulties that result in substantial project delays stem from decisions made well before design is initiated. When compliance consultation is constrained by conclusions already reached or approaches into which GSA has already invested too extensively to seriously consider any alternatives, GSA risks an ACHP determination of foreclosure, making GSA vulnerable to litigation for violating the NHPA. The best way to avoid this risk is to improve employee awareness of the sequence of decisions that lead to each major real estate action. By consulting the Regional Historic Preservation Officer (RHPO) at the earliest stages of project development, project managers ensure that GSA initiates the compliance process properly and has an opportunity to consider appropriate alternatives well before becoming committed to a particular course of action.

High visibility actions for which early consultation is most beneficial in preventing controversy and project delay include site selection, disposal, acquisition, demolition, and change of use—such as the departure of high public-contact tenants, or tenant users, such as postal retail, that provide public access to significant spaces. Major exterior changes, such as additions, courtyard infill, closure or creation of new entrances, and accessibility modifications that will alter facade openings or building settings should also be considered.

Risk can be averted by initiating informal consultation when alternatives are still being discussed within GSA—even if the known facts are insufficient to submit a full analysis, take a particular position, or recommend a specific approach for Section 106 review.

ONLINE TOOLS FOR BETTER PROGRAM MANAGEMENT

The Internet has become GSA's most cost-effective means by which to widely distribute model contract documents and answers to commonly asked questions. Since the last comprehensive assessment of GSA stewardship-related activities, GSA's online access to technical material for historic building projects has expanded to the extent that architects involved in private projects report using GSA's preservation Web page as their central source for preservation information. GSA now boasts a comprehensive national preservation site of useful tools, databases, templates, and publications. The site also provides links to preservation regulatory, technical, and educational sites nationwide as well as four regional preservation sites featuring preservation program procedures, contacts, and information on regional historic buildings and projects. The National Capital Region site includes a technical guideline series.

Getting important documents and data sources online continues to be a priority. Indexing the *Preservation Desk Guide* for online subject search greatly increased its use and value. Updates to GSA's Technical Procedures Database and Building Preservation Plan are also underway, including development of expanded reporting capability to generate cross-inventory condition information. Initial planning is also underway to create an online archeological records database that will allow greater public access to research and recovery information.

Making sure project teams use this information requires multiple communication strategies and some redundancy in designing online access to key resources. Whereas comprehensive databases and indexed guides provide broad, methodical access to a body of like records, businessline-focused online tools direct users to specific guideline documents, templates, and resources most relevant to a particular program or real estate activity. Project manager tools include checklists, qualification criteria, and contract templates to reduce project development time and effort and improve project outcomes. Realty specialist tools include checklists and solicitation templates addressing location, reuse, and project review requirements for lease acquisition. Preservation technical guides and prototype studies focus on particular repair and alteration challenges, such as fire-safety retrofitting and perimeter security.



THE SIX-VOLUME *PRESERVATION DESK GUIDE* BRINGS TOGETHER A COMPREHENSIVE BODY OF KNOWLEDGE DEVELOPED BY GSA AND SERVES AS A CENTRAL INSTITUTIONAL MEMORY FOR GSA'S SUBSTANTIAL PORTFOLIO OF HISTORIC BUILDINGS.

Universal use of best practice templates ultimately depends on their regular integration into standard regional solicitation and scope of work templates. The consistent involvement of RHPOs in historic building repair and alteration projects in their areas is critical to maximizing regional use of these documents for better project outcomes.

Preservation Desk Guide

In December 2001, the Center for Historic Buildings released a six-volume *Preservation Desk Guide* to familiarize associates and contract Architectural and Engineering (A/E) teams with the wide range of preservation responsibilities tied to GSA's business activities. In addition to direct guidance on innovative approaches and troubleshooting techniques for solving a variety of design, construction, and real estate challenges involving historic buildings, the guide contains information on useful preservation resources and model documents developed by GSA's regions.

The encyclopedic collection of documents contributed by all eleven regions brings together a comprehensive body of knowledge developed for historic building projects over the years, serving as a central institutional memory for GSA's substantial portfolio of historic buildings. The most comprehensive internal preservation program resource ever created by a federal agency, the guide will save countless hours of effort and raise the standard for GSA projects nationwide as project managers draw upon previously approved solutions created and refined by past projects.

Complete sets of the *Preservation Desk Guide* are available in each regional Portfolio Management Office and through each RHPO. GSA launched the online *Preservation Desk Guide* in 2006, allowing

document searches as well as browsing by document type—GSA preservation guidance, GSA sample documents, and non-GSA preservation guidance documents.

Preservation Program Web Sites

The Center has greatly expanded GSA's preservation Web pages (www.gsa.gov/historicpreservation) to include a wide range of technical, regulatory, and advocacy-related resources developed by the Center and other public agencies and private organizations. The expanded pages include GSA's historic building database, Center policy and technical guides, GSA's vast technical preservation procedures database, and links to a variety of relevant sites. In support of GSA's Capital Program, the Center added a new Project Manager Tools page in 2003, including templates for design, site selection, and construction procurement documents and a link to technical preservation resources.

A number of regions have developed their own substantial preservation Web sites to support regional needs. Regional additions include the Greater Southwest Region's new "Historic Preservation and Fine Arts" and the National Capital Region's "Outreach to the Community" pages. The Greater Southwest Region's site provides information on regional historic buildings and activities for associates and the public, also meeting GSA requirements under E.O. 13287 to support *Preserve America's* heritage tourism initiative. The National Capital Region's outreach page describes the importance of the regional historic building inventory to the community and the millions of tourists who visit the nation's capital each year. GSA's Rocky Mountain and Pacific Rim Regions now offer extensive information on regional historic properties and preservation-related activities as well.

PROGRAMMATIC AGREEMENTS FOR STREAMLINED REVIEW OF REPAIRS AND ALTERATIONS

The Southeast/Sunbelt and National Capital Regions have Programmatic Agreements (PAs) in place to streamline Section 106 review of specified repairs at buildings for which Historic Structure Reports or Building Preservation Plans (BPPs) have been prepared. In the years following development of the BPP template, it was thought that PAs might be negotiated in most, if not all, regions using BPPs to simplify review of routine projects. However, it can be difficult to achieve consensus on broad PAs such as these in multi-state regions where not all State Historic Preservation Officers (SHPOs) may be confident in GSA's ability or commitment to follow proper preservation procedures absent external review. Single state PAs are a practical alternative where the volume of repair and alteration activity justifies the streamlining effort.

Fortunately, confidence in GSA's stewardship reliability is improving dramatically with the increasing professionalism of regional preservation associates, the new standard RHPO position description, and ADM 1020.02 qualification requirements for preservation staff. In 2004, the Rocky Mountain Region negotiated PAs with SHPOs in Utah and Colorado premised on oversight by a qualified RHPO and professional preservation staff from early planning through project completion and assurance that projects will follow the

Secretary of the Interior's Standards and BPP recommendations. These agreements, like those executed by the National Capital and Southeast/Sunbelt Regions provide conditional exclusion for routine in-kind repairs and certain alterations when approached in a specific and appropriate manner. In addition, the Utah PA provides conditional exclusions (consistent with the Secretary's Standards) for certain types of lease actions. A similar Programmatic Agreement for GSA's Pacific Rim properties is being circulated to SHPOs for signature and is expected to be in place by the end of 2008. In addition to streamlined review for projects adhering to GSA's best preservation practice standards, this PA delineates GSA stewardship roles and procedures for a broader range of historic property decisions and activities, including a standard compliance approach for lease acquisitions that may affect historic properties.

Managing Section 106 compliance in a cost-effective, efficient manner depends on avoiding protracted controversy and project delays over adverse-effect projects. GSA's national preservation program continues working to institutionalize the use of preservation project tools, such as model scopes of work and qualification standards, and to establish project management methods designed to keep potentially adverse projects from getting into trouble in the first place.

PUBLIC PROCESS AND MODEL AGREEMENTS FOR DISPOSAL, RELOCATION, AND MITIGATIVE INTERPRETATION

Perhaps in response to GSA's implementation of the Portfolio Strategy, the 2005–2008 reporting period continued developing precedent-setting agreements and procedures for protecting historic properties in disposal or adversely affected by major property changes, such as site clearing for new construction or building excavation for seismic retrofit or secure parking. Although inconsistent Section 106 submissions and late initiation of mandated public participation continue to contribute to project delays, regions have developed a variety of successful models for meaningful and timely public participation. It is also anticipated that increased regional capability stemming from the raised RHPO position standards will improve GSA's Section 106 submission and public participation track record.

Disposal

Three recent projects stand out as models for avoiding or mitigating adverse effects associated with historic building transfers, including providing for long-term preservation oversight. They are the Old U.S. Mint in San Francisco, California, the Old Post Office and Custom House in St. Louis, Missouri, and Clara Barton's Office of Missing Soldiers at 437 Seventh Street, N.W., within Square 457 in Washington, D.C. The Programmatic Agreement for the Old Mint lays out a process for selecting a new use and developer modeled on the Request for Qualifications and Use developed for the Tariff Building outlease. Both the San Francisco and St. Louis transfer agreements include provisions for third-party review of substantial changes similar to the Section 106 compliance process. GSA's preservation easement in Square 457 will preserve Barton's office and quarters in perpetuity, with provisions for public access and interpretation.

ADAPT SPACE FOR NEW USES WHILE MAKING
THE MOST OF HISTORIC ARCHITECTURAL FEATURES

SUCCESS STORY

**GENE SNYDER U.S. COURTHOUSE
AND CUSTOM HOUSE
LOUISVILLE, KENTUCKY**

GSA REPROGRAMS SPACE WITHIN ITS HISTORIC BUILDINGS TO MEET THE EVOLVING NEEDS OF ITS CUSTOMERS. THE BEST FIT OCCURS WHEN TENANTS ARE ABLE TO MAKE THE MOST OF HISTORIC ARCHITECTURAL FEATURES AND MINIMIZE THE NEED FOR COSTLY ALTERATIONS THAT COMPROMISE HISTORIC CHARACTER. VACATED POSTAL WORK AREAS FLANKING THE CEREMONIAL LOBBY AT THE GENE SNYDER U.S. COURTHOUSE AND CUSTOM HOUSE IN LOUISVILLE NOW HOUSE OFFICES FOR THE SOCIAL SECURITY ADMINISTRATION AND COURT CLERKS. THE HIGH CEILINGS AND GENEROUS DAYLIGHT COMMON TO HISTORIC POSTAL WORK AREAS MAKE THEM DESIRABLE SPACES THAT ARE EASILY ADAPTED FOR CONTEMPORARY OFFICE CONFIGURATIONS.

GENE SNYDER U.S. COURTHOUSE AND CUSTOM HOUSE
LOUISVILLE, KY, 1931-1932, 1936





GSA holds the preservation easement and retains enforcement responsibility. (See Section 4 for detailed accounts of each transfer.)

Historic Building Relocation

Agreements developed for the Frank E. Moss U.S. Courthouse expansion in Salt Lake City, Utah, and the new federal courthouse in Springfield, Massachusetts, include provisions for relocating small historic buildings on construction sites to adjoining, privately owned lots. In both cases, the historic buildings survived as isolated structures on their blocks, so relocation, while considered an adverse effect according to the Secretary's Standards, actually helped to reestablish an appropriate period context for the buildings. (See also Acquisition, Section 4.)

Interpretation

In situations where new construction or necessary alterations will adversely affect historic buildings or archeological resources, enhancing public understanding of the site is usually an important aspect of the mitigation plan. For example, mitigation for alterations associated with seismic improvements, creation of secured underground parking for judges, and space reprogramming at the Pioneer U.S. Courthouse in Portland, Oregon, included establishing a special Citizens Advisory Panel to guide the development of appropriate interpretive materials. The panel includes representatives from parties or individuals with interests in preservation, tourism, and public relations.

Mitigation for loss of the extensively deteriorated San Diego Hotel on the San Diego courthouse expansion site includes development of portable exhibits to display archeological artifacts and architectural material of interest. (The MOA establishes guidelines for determining the significance of potential archeological artifacts discovered on the site.)

PUBLIC PARTICIPATION

In the 1990s, revisions to the Section 106 implementing regulations diminished the involvement of the ACHP and increased the role of the public. The shift was made to allow the Council to focus its efforts on more strategic involvement in projects of national concern, and to reduce protracted controversy resulting from lack of (or last-minute) public involvement. Through our ACHP liaison position, GSA again has the benefit of dedicated staff for review and support of GSA compliance activities. The liaison has proven invaluable in crafting strategies for timely and constructive public involvement. Well-organized and publicized public meetings help to ensure that GSA meets its compliance responsibilities and creates opportunities for potentially valuable input without putting project schedules at risk. Model notices and agendas for public meetings are provided in the *Preservation Desk Guide*.

TOOLS AND TEMPLATES FOR BETTER PROJECT MANAGEMENT

A variety of decision-making tools, guidance, and template documents are now available on the Center's Web page to assist regional associates in seeing Section 106 compliance to successful conclusion. Compact Section 106 process guides tailored to PBS activities include GSA's

- Project Management Preservation Checklist;
- Historic Building/Historic Courthouse Project Decision Trees; and
- Real Estate Compliance Checklist for Lease Acquisition (developed by the Rocky Mountain Region).

Each document provides a detailed project sequence showing which actions trigger Section 106 consultation and what is required for each step. The Project Management Preservation Checklist also identifies template scopes, solicitations, and other tools developed specifically for GSA historic building projects, keyed to particular project development stages.

A standard leasing and new construction site solicitation clause encouraging agency location in historic areas and historic buildings is also available, along with the Real Estate Environmental and Preservation Checklist, on the Center's Web page. GSA realty specialists and account managers can reinforce these provisions by actively encouraging agencies to be flexible in meeting their space requirements so that available space in historic buildings can be put to use. Translating prescriptive requirements, such as minimum column spacing or specific space layouts, into performance standards capturing their intent, such as work space capacity, privacy, or information access needs, would enable historic buildings to be more competitive.

A variety of tools and templates for improving the quality of design and construction in historic buildings are now available online. Most important among these tools are

- A/E solicitation clause requiring preservation specialists in design teams for historic building projects;
- A/E scope of work preservation requirements sections on outlining the preservation specialist's responsibility for design problem solving, project documentation, and construction oversight for Section 106 compliance; and
- Construction firm qualifications for repair, replication, and cleaning of historic materials.

Procuring preservation design skills for historic building projects is the most cost-effective way to ensure that repairs and alterations are undertaken in an appropriate manner. Key to timely compliance is the clearly defined, integral role of preservation design professionals in A/E scopes of work for repairs and alterations at historic buildings. A project scope must define the continued involvement of the preservation design consultant during construction to ensure that approved solutions are executed properly. It

should also specify that the preservation architect will be available to resolve unanticipated preservation issues that may arise during construction.

The preservation services scope of work, Section 106 project compliance submission format, and contractor qualification standards in the *Preservation Desk Guide* are designed to help minimize the risk of project delays and ensure that GSA gets what it pays for.

Other tools have been developed to address the common Section 106 pitfall of compliance delay as a result of an inadequate or unpersuasive project submission. A project submission should always be prepared by a preservation professional who has been integrally involved in the project. The submission should make a strong case for the project approach and provide all graphic and descriptive material required for reviewers who have no knowledge of the building to visualize existing conditions and how the project will change them. The compact Section 106 project report template reduces submission bulk and the time required to complete the project review, often eliminating the need for reviewer site visits and reducing requests for additional information. The compliance submission report should include a project description narrative explaining alternatives and justifying recommended options, captioned photos of existing conditions, and reduced design details illustrating preservation solutions. Focusing on the project's preservation issues and excluding extraneous material allows the reviewer to concentrate on compliance issues.

GENERAL DESIGN GUIDES

The Office of Chief Architect (OCA) guidebooks and online tools assist project managers and A/E teams with historic building projects. Three OCA guides—Site Acquisition, Accessibility, and Project Planning—provide detailed preservation guidance. They include timelines for the various compliance actions and identify tasks and issues to be addressed in each project phase. Preservation planning, consultation, and problem solving are also integral to the *GSA Project Planning Tool*, a comprehensive online guide to the roles, activities, resources, documents, and milestones associated with each phase of project development, from early planning through feasibility analysis, program development, site acquisition, design, construction, and tenant occupancy.

Whole Building Design Guide

The Center for Historic Buildings is a leading contributor to a new comprehensive preservation design resource that benefits federal project teams as well as A/Es engaged in nonfederal projects. The *Whole Building Design Guide (WBDG)* is a comprehensive online tool spearheaded by the National Institute of Building Sciences and developed by and for federal agencies. The intent of the guide is to raise the quality of all federal construction projects by consolidating federal design knowledge and experience to create a broad and organized body of best design practices. Designed to complement GSA's *Procurement Federal Facility Standards*, the *Court Design Guide*, and other agency-specific design requirements,



U.S. CUSTOM HOUSE
PHILADELPHIA, PA, 1932-34



U.S. COURTHOUSE AND FEDERAL BUILDING
INDIANAPOLIS, IN, 1902-1905

the *WBDG* provides best practice approaches addressing virtually every major project category or discipline commonly encountered in federal facility projects, links to relevant documents and sites, and design issue analyses.

The Center, in collaboration with the National Park Service, Department of Defense, and other agencies, completed and published the *WBDG*'s new historic preservation chapter in February 2004. The Center continues participating as a principal contributor to technical sections on systems integration, fire safety, security, and procurement of qualified contractors. A majority of images on the *WBDG* preservation pages illustrate GSA historic properties and design solutions.

Guidance for Applying Codes and Standards Flexibly

GSA's P100 *Federal Facilities Standards*, released in November 2000 and revised in March 2003, and in revision for reissuance in 2009, allow for performance-based approaches to achieving code compliance and meeting other design goals in existing buildings, particularly historic buildings where preserving historically significant materials and design is also important. Unfortunately, these performance-based approaches are not employed as consistently for GSA-leased buildings as they are for GSA-owned buildings where higher preservation standards, encouraging flexible compliance approaches, are generally applied.

Space alterations in leased historic buildings—by law given the same protections and requiring Section 106 review applicable to owned historic buildings—are often overlooked altogether, occasionally with devastating repercussions for historic interiors GSA occupies. Some realty specialists overseeing these leases are simply unaware of the mandatory review process for alterations to historic buildings. Generic space design approaches, often resulting in removal of historically significant materials and features, continue to dominate. This places GSA in a precarious position of vulnerability to litigation from outside groups objecting to GSA defiance of federal law. A particular challenge is the traditional organizational separation between realty specialists and project development teams, since most leased space alterations are undertaken by private owner/developers, not GSA design and construction teams.

To bring realty specialists up to speed on how to approach alterations in historic buildings, the Center is developing the *Technical Preservation Guide to Space Alterations in Historic Buildings*, with preservation compliance review, illustrated solutions to common challenges, and additional resources.

Most codes include provisions for alternative or equivalent solutions to meet code intent in historic buildings, such as reuse of unrated stair doors with added water wash as part of a new fire suppression system. The Department of Housing and Urban Development's *Guide to Fire Ratings of Archaic Materials*, revised and reissued in 2000, provides test data on a variety of historic materials and assemblies that can help to support retention of these materials within egress paths.

INTEGRATE IDENTIFICATION, REINVESTMENT, AND DESIGN PLANNING

SUCCESS STORY

MODERNISM INITIATIVE

GSA'S TEN-YEAR MODERN-ERA BUILDINGS INITIATIVE EXAMINED NEARLY SIX HUNDRED BUILDINGS TO UNDERSTAND WHICH MIGHT BE SUBJECT TO SECTION 106 COMPLIANCE REQUIREMENTS NOW OR IN THE FUTURE IN *GROWTH EFFICIENCY AND MODERNISM: GSA BUILDINGS OF THE 1950s, 60s AND 70s*, WHICH INCLUDES A NATIONAL REGISTER ELIGIBILITY ASSESSMENT TOOL. REINVESTMENT PROCESS REFINEMENTS FOR BUILDINGS UNDERGOING MAJOR MODERNIZATION LED TO GSA'S WELL-RECEIVED THREE-TIERED TREATMENT APPROACH FOR ENSURING THAT CHANGES TO POTENTIALLY ELIGIBLE PROPERTIES ARE SYMPATHETIC WITH EACH BUILDING'S ORIGINAL DESIGN INTENT AND DO NO HARM TO CHARACTER-DEFINING FEATURES.

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MA, 1963-1966





COMPUTER-GENERATED
SIMULATIONS CAN BE AN
EFFECTIVE WAY TO HELP
CUSTOMERS VISUALIZE
REUSE SCENARIOS.



GRAPHIC SIMULATION WAS USED TO SHOW HOW A NEW COURTHOUSE TOWER AND SMALLER HISTORIC HOTEL BUILDING MIGHT RELATE IN ONE ALTERNATIVE FOR EXPANDING GSA'S FEDERAL COURTHOUSE IN SAN DIEGO, CA. ALTHOUGH SITE AND BUILDING CONDITIONS ULTIMATELY RULED OUT PRESERVING THE HOTEL, THE COURTS ACKNOWLEDGED THAT THE SIMULATION HAD SUCCESSFULLY ADDRESSED AESTHETIC CONCERNS ASSOCIATED WITH INTEGRATING OLD AND NEW.

National Fire Protection Association code 914, *Fire Protection in Historic Structures*, outlines a process for performance-based compliance and consideration of equivalencies. Numerous compliance challenges in GSA's historic buildings can be met successfully through thoughtful design that fully complies with prescriptive codes. Often, however, preservation-appropriate, prescriptive compliance carries the additional cost of custom materials such as paneled fire doors, custom-finished sprinkler heads, and other fire-resistive hardware and assemblies tailored to blend with historic finishes and features.

In many instances, a hybrid approach of prescriptive and equivalency or performance-based code compliance offers the best balance between preservation and safety goals. Acceptance of equivalencies and performance-based solutions is location-specific since a number of factors such as corridor width and length, building density, and occupancy characteristics determine how a building will perform in a fire scenario.

DESIGN DEVELOPMENT TOOLS: CHARRETTES AND SIMULATION

A design charrette is an intensive design workshop that invites community dialogue and participation. GSA uses charrettes to gather multiple perspectives, capture the creative energy produced by collaborative thinking, and diffuse public controversy by involving interested parties.

Charrettes continue to serve GSA as a means for gathering ideas for solving challenging preservation issues in a structured and constructive manner. In 2001, the Rocky Mountain Region successfully demonstrated the value of a well-designed charrette for diffusing controversy amid community objections to GSA plans to modify the exterior of the Byron Rogers Federal Building and U.S. Courthouse in Denver, Colorado, to accommodate expanded security processing and humanize a stark plaza. In response to community concerns, the region invited local architects and individuals specializing in Modern architecture to generate design options that would achieve the project's functional goals while preserving the building's character-defining architectural features. The charrette led to an alternative design concept that preserved the building's original 1965 colonnade.

GSA has recently begun to use computer-generated simulations to demonstrate the positive effects of preservation and restoration. This can be an effective way to help customers visualize a successfully—or unsuccessfully—altered space after restoration. The simulations are best used to show inspiring possibilities rather than to steer customers to a specific design. In San Diego, California, a simulation illustrated a restored facade and lobby of a deteriorated hotel linked to a hypothetical new courthouse. In Minneapolis, Minnesota, a simulated restoration was used to attract new tenants to the vacated 1912 Federal Office Building. Simulations can serve a dual role supporting GSA's marketing and interpretation goals. To interest nonprofit educational organizations in a partnership with GSA to interpret and provide public access to GSA easement space containing Clara Barton's historic Office of Missing Soldiers, GSA has created

an animated walk-through showing how the historic spaces will look restored and furnished as they were during Miss Barton's occupancy. The animation is being incorporated into an educational video detailing the history and significance of the 1850s building and GSA's role in its preservation, beginning with a GSA employee's discovery of artifacts revealing the building to be the location of Clara Barton's Civil War-era office and quarters.

TECHNICAL PRESERVATION STUDIES, GUIDELINES, AND DESIGN PROTOTYPES

Given the dynamic nature of codes, standards, and systems, GSA will always need to be on the cutting edge of preservation technology, actively broadening its institutional knowledge of model design solutions to common problems and new challenges raised by changing requirements.

In 2001, the Center launched a new GSA-tailored technical guide series to educate project teams on the issues and model design solutions used at GSA historic buildings. All guides are available on the Center's Web page.

Fire Safety

Fire Safety Retrofitting, issued in April 2001, documents exemplary GSA solutions for smoke detection and alarm systems, fire suppression, and separation. *Alternative and Innovative Fire Protection Technologies*, completed in 2004, describes the principles underlying fire safety codes and prescriptive, equivalency, and performance-based compliance approaches, along with the role that fire-risk indexing can play in devising a compliance approach that considers the building as a whole of interrelated fire protection attributes and features. It explores risk assessment and protection, illustrating current and in-development technologies suitable for historic public buildings. Devices and refinements described in the report include low-profile detection and suppression devices, as well as laser beam and air sampling detection, and special finish treatments and installation approaches to make detection and suppression features less obvious.

Heating, Ventilating, and Air Conditioning

Promising approaches to heating, ventilating, and air conditioning (HVAC) are also being explored through development of preservation design prototypes. In 2000 and 2001, the Center undertook a two-part study exploring HVAC retrofitting technologies that minimize the need for architecturally intrusive ductwork.

HVAC Technology for Historic Buildings explores new technology and product options for reducing the cost and intervention required to upgrade HVAC in GSA historic buildings. Recommended approaches include selective reuse of existing components, especially main ventilation ducts, supplemented by piped heating and cooling systems to eliminate the need for new larger ducts. The study also examines the advantages and disadvantages of water source heat pumps, four-pipe fan coils, and ductless split systems as low-intervention alternatives for historic spaces.

As a follow-up to the study, a 2002 pilot installation of four-pipe fan coil units replaced existing window air conditioning units and radiators in the Office of the Chief Architect. Despite technical setbacks associated with the building's built-in drainage, along with fresh air and chilled water supply limitations that hinder the system's intended individual work space control, the installation is performing properly and has been well received. Principal installation benefits include reduced deterioration of stone from condensate, improved window views, reduced infiltration, and workstation control at each fan coil unit.¹⁴

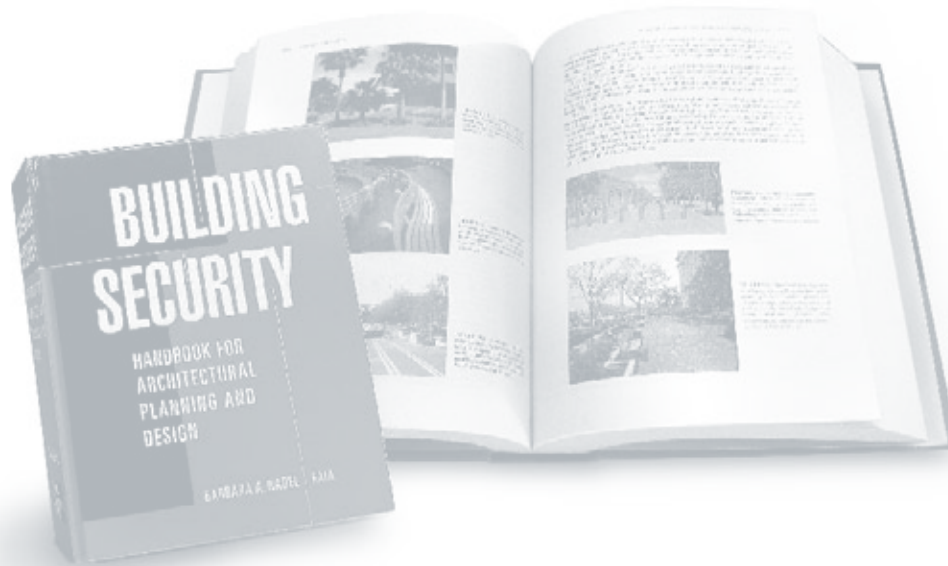
Security and Public Access

Since the 1995 Oklahoma City bombing, the call for immediate and long-term security improvements has introduced conflicts with federal mandates to protect historic properties. In response, GSA has joined other stewardship agencies to devise preservation-appropriate approaches and is taking the lead in designing model solutions for surveillance, perimeter security, and glass fragmentation window retrofit. Guiding priorities are installation reversibility, preservation of character-defining features, integrated design of new features, and maintaining appropriate access to public spaces.

Design for circulation control at building entrances raises architectural and philosophical issues regarding the symbolic function that lobbies in public buildings were designed to serve. GSA's P100 *Federal Facility Standards* encourage keeping ceremonial entrances accessible to the public. One way to preserve open lobbies while maintaining public access is to place security-processing functions in adjoining ancillary spaces.

In 2001, the National Capital Region commissioned KressCox Associates PC (now Cox, Graae and Spack) to develop a conceptual design for better integrating security, landscape design, and urban planning in Washington, D.C.'s Federal Triangle to increase public use and enjoyment of the complex's outdoor spaces. *Culture and Commerce: Bridging the Federal Triangle* offers a variety of imaginative design solutions tailored to the urban character and security requirements of the Federal Triangle's perimeter. Vehicle barriers, for instance, incorporate public amenities such as fountains, garden walls, ornamental bollards, landscaping, and street furniture designed to maintain the dignified quality of the complex while making it safe and inviting. The concept also included additional lighting and traffic-calming measures.

To test the adaptability of the garden wall vehicle barrier concept to different urban and historic settings, the Center commissioned a pilot design study in 2002, collaboratively carried out by the Great Lakes Region's preservation staff and the project team for the modernization of the Howard M. Metzenbaum U.S. Courthouse in Cleveland, Ohio. A prototype "kit of parts" was developed, incorporating impact-engineered amenities such as benches, bollards, and ornamental railings, using a traditional architectural vocabulary appropriate for a granite-clad, classical building. The kit of parts allows the system to be adapted to a range of urban conditions requiring different degrees of pedestrian access, formality, and visibility. The kit of parts was adapted to suit a picturesque Victorian brick building and a 1960s Modern building.



Results of the pilot design study were placed on the Center's Web page and published in the Association for Preservation Technology International's quarterly *Bulletin* in 2004. Model security approaches are also provided in the historic preservation chapter of *Building Security: Handbook for Architectural Planning and Design*, jointly written by Center and National Park Service staff and published by McGraw Hill in 2004.

In 2007, GSA launched a design study to document successful approaches for integrating security processing into historic building lobbies. An illustrated design guide showing model solutions for historic lobbies of different sizes and configurations will be available in early 2009. Designed to complete GSA's general *Lobby Security Design Guide*, the historic lobby design guide provides images and narrative guidance for layout, equipment placement, and detailing to minimize the architectural impact of security processing activities on historic entry spaces and materials.

Seismic Retrofitting

Recent advances in base isolation, center core anchor reinforcement, fiber reinforcing composites, and other retrofitting technologies now provide a range of appropriate alternatives for preserving historic interiors and exteriors in structural upgrades to comply with seismic protection codes. Nevertheless, achieving the investment payback required to maintain acceptable financial performance now threatens the viability and continued use of many, if not most, GSA historic buildings in high seismic risk zones.

GATEWAY RESTORATION CONTRIBUTES
TO A GOOD FIRST IMPRESSION

SUCCESS STORY

**FEDERAL BUILDING AND U.S. COURTHOUSE,
PORT HURON, MICHIGAN**

IN SUPPORT OF OUR FIRST IMPRESSIONS INITIATIVE TO MAINTAIN INVITING BUILDING GATEWAYS, GSA USED HISTORIC BUILDING OUTLEASE FUNDS TO RECLAIM THE ARCHITECTURAL INTEGRITY OF A RADICALLY ALTERED ENTRANCE LOBBY-CORRIDOR AT THE 1877 FEDERAL BUILDING AND U.S. COURTHOUSE IN PORT HURON, MICHIGAN, AND SECURE A LONG-TERM TENANT. SURVIVING HISTORIC PHOTO DOCUMENTATION ENABLED GSA TO RECREATE THE ORIGINAL LOBBY VOLUME, ARCHITECTURAL DETAILS, AND ORNAMENTATION TO PROVIDE A GRACIOUS ENTRY EXPERIENCE, REESTABLISHING THE BUILDING AS A PREMIER COMMUNITY LANDMARK.

FEDERAL BUILDING AND U.S. COURTHOUSE
PORT HURON, MI, 1877





The Center study *Seismic Retrofit for GSA Historic Buildings: Technical and Financing Strategies*, prepared in 2001, explores current technologies, GSA seismic upgrades completed to date, and international repair, protection, and funding strategies used where important historic buildings are located in high seismic risk zones. Case studies explore alternative financing strategies, such as limited pursuit of public-private partnerships and special (bundled) appropriations for high-profile landmarks otherwise unable to compete for capital investment under the Federal Buildings Fund.

Buildings under Fifty Years Old

Regardless of a property's historic designation, the Secretary of the Interior's *Standards for Rehabilitation* are useful for planning repairs and alterations to any building. By striving to ensure that changes are physically and aesthetically compatible with original materials and design, the Standards minimize the risk of alterations undermining the value of a building. To assist design teams facing similar challenges, the Center continues seeking successful GSA project solutions to design problems commonly encountered when maintaining and upgrading modern office buildings.

GSA's Modern-era buildings context study included case studies showing sympathetic alterations undertaken to keep Modern-era buildings in repair and marketable. At the Association for Preservation Technology's 2006 conference entitled "When Modern Becomes Historic," GSA presented its three-tiered approach to planning alterations at buildings of this era. Presentation case studies included an exceptionally significant building already eligible for the National Register being treated the same as other GSA historic buildings, designing a security processing station, bollards, and security partitioning using the building's original material palette and vocabulary. At a building determined likely to be eligible in the future, GSA took greater liberty, updating a lobby with new materials and features to articulate the space, using compatible materials, colors, and detailing. An undistinguished building unlikely to ever qualify for the National Register was modernized in a practical and economical manner, replacing all but the facade's structural framework to meet contemporary seismic and energy conservation standards. GSA's philosophy and practical approach were well received by attending design professionals.

The following year, GSA was invited to participate in panel discussions on Modern-era buildings at the National Preservation Conference in Minneapolis, Minnesota; the Traditional Buildings Conference in Boston, Massachusetts; and a symposium hosted by the International Council on Monuments and Sites' Scientific Committee on Twentieth Century Heritage and held in Chicago, Illinois. GSA's approach was well received in these venues as well.

First Impressions

In 1999, GSA initiated the First Impressions program to create and maintain attractive, inviting building gateways by eliminating clutter, articulating building entrances with landscaping and appropriate way-finding, and architecturally integrating new lobby furnishings and features.

Despite limited funding specifically for First Impressions projects, the program's aggressive education campaign has succeeded in raising agency-wide consciousness regarding the importance of well-designed change in significant public areas.

Lobby and corridor improvements undertaken at GSA's 1917 headquarters building in Washington, D.C.—not as a formally designated First Impressions project but initiated in direct response to the program's educational campaign—illustrate the program's principals and benefits, including those of tenant and facility staff culture adjustments to maintain architectural cohesiveness in public spaces. Interventions included simple clutter reduction, selective restoration, integrated design for new furnishings, and creation of building standards to encourage context-sensitive change. Low- and no-cost interventions included removal of unnecessary signs, relocation of employee information kiosks, and ending use of ceremonial corridors for temporary storage.

To further reduce visual clutter, security monitors were concealed within a dual-oriented, architecturally integrated guard desk. Replicas of the original bronze and glass sconces were installed in place of 1960s aluminum sconces, admitting greater light into the corridors while using energy-efficient lamps and ballasts.

Establishing a corporate culture that supports high standards for public space and design unity grounded in preservation is a challenge in buildings where piecemeal alteration to satisfy individual program demands has been the rule for decades. At the GSA building, procedures to encourage a consistent and appropriate approach to change have been developed. The standards address a range of common tenant requests, from event announcements and interpretive displays, to window treatments and door modifications.

The GSA building case study is a good model for lobby streamlining that respects and calls attention to the quality original materials and detailing that sets historic buildings apart. In working with historic buildings, design teams must recognize the original design intent and historic features as the basis for an integrated design of new furnishings and features, rather than tailoring changes to previous alterations. In 2003, the Center released the Technical Preservation Guideline *First Impressions at Historic Buildings* to assist design teams in making the most of a building's historic architectural character.



SEIZE SPACE EXPANSION OPPORTUNITIES TO MEND TORN
URBAN FABRIC WHILE REUSING A PROMINENT HISTORIC BUILDING

SUCCESS STORY

**WILLIAM J. NEALON FEDERAL BUILDING
AND U.S. COURTHOUSE
SCRANTON, PENNSYLVANIA**

COURTHOUSE EXPANSIONS THAT INVOLVE
CONSTRUCTING OR ACQUIRING SPACE TO
SUPPLEMENT HISTORIC BUILDINGS CAN
REVITALIZE HISTORIC MAIN STREETS AND
EVEN HELP MEND VISUAL TEARS IN THE
FABRIC OF CITIES. THE COURTHOUSE ANNEX
IN SCRANTON, WINNER OF A 2000 GSA DESIGN
AWARD, REESTABLISHED THE ARCHITECTURAL
UNITY OF THE TOWN SQUARE BY REPLACING
A DETERIORATED, OUT-OF-SCALE APARTMENT
HOUSE WITH A CONTEXTUALLY DESIGNED
ANNEX AND ALLOWED THE COURTS TO REMAIN
AT THEIR PROMINENT DOWNTOWN LOCATION.

WILLIAM J. NEALON FEDERAL BUILDING
AND U.S. COURTHOUSE
SCRANTON, PA, 1931, ADDITION 1999



Work Space and Circulation

GSA is exploring a variety of model design approaches for meeting the latest work space requirements while maintaining the integrity of historically significant circulation areas. At the elegant Ariel Rios building in Washington's Federal Triangle, vaulted corridors were preserved and select end corridors reconfigured to create open work space. Mahogany and glass partitions were installed to provide a sympathetic juncture between restored public areas and contemporary work space.

At the Office of the Chief Architect in GSA's Washington, D.C., headquarters building, secondary corridors adjoining the central spine were partially restored (reestablishing the original high ceilings and transoms) and selected corridor locations opened to create a collegial studio featuring individual workstations clustered around informal meeting areas. Keys to the success of this solution were restoration of the corridor's principal character-defining features, making the most of the suite's well-defined circulation route and exceptional daylight, and the use of high-quality, movable, architecturally integrated furniture in the common corridor space, as opposed to fixed modular workstations or low-end institutional furniture that would have redefined the corridor as utilitarian space.

A PARTIALLY RESTORED CENTRAL
CORRIDOR AND REHABILITATED
WORK SPACE OFFER GENEROUS
DAYLIGHT AND OPPORTUNITIES
FOR COLLEGIAL INTERACTION TO
MEET THE NEEDS OF THE OFFICE
OF THE CHIEF ARCHITECT IN GSA'S
1917 CENTRAL OFFICE BUILDING,
ORIGINALLY CONSTRUCTED FOR
THE DEPARTMENT OF INTERIOR.



CORRIDOR WITHIN OFFICE OF THE CHIEF ARCHITECT, GSA HEADQUARTERS BUILDING, WASHINGTON, D.C.



GSA The Center for Historic Buildings *to the Film Industry*

James B. White U.S. Courthouse
Denver, CO
Architect: Tapp, Swatlow, Kniffler &
SPLS - 1998



Welcome

The Federal Government has a new culture of protecting and preserving public historic buildings responsible for the history, identity, and pride of America's major business and U.S. Special Districts. In addition to the U.S. Courthouse in Denver, CO, the Center for Historic Buildings has a new federal campus in over 2000 historic buildings that have provided a rich and varied history and identity of our nation's cities, towns, and states. The Center for Historic Buildings has a new website to help you learn more about the history and identity of our nation's cities, towns, and states. The Center for Historic Buildings has a new website to help you learn more about the history and identity of our nation's cities, towns, and states.

You are Invited

To explore the web site, please visit the following:
[Home](#)
[About Us](#)
[Programs](#)
[Services](#)
[Sustaining Staff](#)
[Contact Us](#)

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Below is a list of historic properties below:



FOSTERING GREATER AWARENESS AND ABILITY: TRAINING AND RECOGNITION

Agency-wide commitment to historic building stewardship begins with broad-based staff and tenant recognition that historic buildings are worth it. Toward that end, GSA launched the Public Buildings Heritage Program in 1998, encouraging regions to develop exhibits and brochures promoting GSA's historic buildings. In 2001, the Center established graphic standards and a structure for building a body of visual documentation and quality interpretive material for GSA historic buildings.

Top architectural photographers are commissioned annually to provide quality images for posters and brochures, typically one poster and associated brochure per region each year, for a current total of almost one hundred. Regional offices use the posters and brochures to promote GSA's historic building legacy to customers, compliance organizations, preservation advocacy groups, and program staff. The Center has entered into an agreement with the Library of Congress to make photographs of GSA buildings available through its online image library.

These materials are available through Regional Historic Preservation Officers, managers of featured buildings, and the Center. The posters and brochures are available digitally on the Center's Web page.

In cooperation with the regions, the Center has undertaken a series of films profiling architecturally exceptional historic buildings in places of national preservation events, including the Howard M. Metzenbaum U.S. Courthouse in Cleveland, Ohio; Byron R. White U.S. Courthouse in Denver, Colorado; Pioneer U.S. Courthouse in Portland, Oregon; Gene Snyder U.S. Courthouse and Custom House in Louisville, Kentucky; U.S. Post Office and Courthouse in Pittsburgh, Pennsylvania; and Alexander Hamilton U.S. Custom House in New York, New York. The Southeast/Sunbelt Region is creating a video documenting the adaptive use of Memorial Hall as a federal courthouse in Natchez, Mississippi. Regions have also produced notecards to reinforce efforts to build recognition of GSA's historic buildings among associates.

GSA'S DESIGN AWARDS

In 2005, GSA's Public Buildings Heritage Awards program was incorporated into the biennial GSA Design Awards program under new categories recognizing exemplary preservation, conservation, modernization, and lease construction projects involving historic buildings. Printed materials supporting GSA stewardship efforts may also compete in the graphic design category. Recent preservation project award winners include the following:

2004 (Design Excellence Awards)

U.S. Courthouse, Erie, Pennsylvania: courthouse expansion reusing three historic buildings of different sizes and styles, joined by a contemporary glass link and addition, altogether tripling GSA's occupiable space; and

HISTORIC BUILDINGS SHOWCASED IN THE POSTER AND BROCHURE SERIES INCLUDE

RICHARD C. LEE U.S. COURTHOUSE
NEW HAVEN, CONNECTICUT

WILLIAM R. COTTER FEDERAL BUILDING
HARTFORD, CONNECTICUT

U.S. CUSTOM HOUSE
PORTLAND, MAINE

EDWARD T. GIGNOUX U.S. COURTHOUSE
PORTLAND, MAINE

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS

U.S. CUSTOM HOUSE
NEW BEDFORD, MASSACHUSETTS

HAROLD D. DONOHUE FEDERAL BUILDING
AND U.S. COURTHOUSE
WORCESTER, MASSACHUSETTS

U.S. COURTHOUSE
PROVIDENCE, RHODE ISLAND

JACOB K. JAVITS FEDERAL BUILDING
AND JAMES L. WATSON U.S. COURT OF
INTERNATIONAL TRADE BUILDING
NEW YORK, NEW YORK

ALEXANDER HAMILTON U.S. CUSTOM HOUSE
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NEW YORK, NEW YORK

MICHAEL J. DILLON U.S. COURTHOUSE
BUFFALO, NEW YORK

ROBERT C. McEWEN U.S. CUSTOM HOUSE
OGDENSBURG, NEW YORK

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BROOKLYN, NEW YORK

JAMES T. FOLEY U.S. COURTHOUSE
ALBANY, NEW YORK

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AND U.S. COURTHOUSE
OLD SAN JUAN, PUERTO RICO

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BALTIMORE, MARYLAND

U.S. CUSTOM HOUSE
BALTIMORE, MARYLAND

U.S. CUSTOM HOUSE
PHILADELPHIA, PENNSYLVANIA

U.S. COURTHOUSE
ERIE, PENNSYLVANIA

U.S. POST OFFICE AND COURTHOUSE
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MONTGOMERY, ALABAMA

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MIAMI, FLORIDA

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SAVANNAH, GEORGIA

U.S. CUSTOM HOUSE
SAVANNAH, GEORGIA

WILLIAM AUGUSTUS BOOTLE FEDERAL
BUILDING AND U.S. COURTHOUSE
MACON, GEORGIA

ELBERT P. TUTTLE U.S. COURT
OF APPEALS BUILDING
ATLANTA, GEORGIA

GENE SNYDER U.S. COURTHOUSE
LOUISVILLE, KENTUCKY

U.S. POST OFFICE AND COURTHOUSE
NEW BERN, NORTH CAROLINA

STROM THURMOND FEDERAL BUILDING
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OLD POST OFFICE AND COURTHOUSE
LITTLE ROCK, ARKANSAS

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NEW ORLEANS, LOUISIANA

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SANTA FE, NEW MEXICO

U.S. POST OFFICE AND COURTHOUSE
OKLAHOMA CITY, OKLAHOMA

FEDERAL BUILDING AND U.S. COURTHOUSE
OKLAHOMA CITY, OKLAHOMA

U.S. CUSTOM HOUSE
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JACOB WEINBERGER U.S. COURTHOUSE
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AND COURTHOUSE
HILO, HAWAII

PIONEER U.S. COURTHOUSE
PORTLAND, OREGON

U.S. CUSTOM HOUSE
PORTLAND, OREGON

GUS J. SOLOMON U.S. COURTHOUSE
PORTLAND, OREGON

U.S. COURTHOUSE AT UNION STATION
TACOMA, WASHINGTON

FEDERAL BUILDING AND U.S. POST OFFICE
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DWIGHT D. EISENHOWER EXECUTIVE
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WASHINGTON, DISTRICT OF COLUMBIA

U.S. DEPARTMENT OF JUSTICE BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

U.S. GENERAL SERVICES
ADMINISTRATION BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

U.S. PENSION BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

ANDREW W. MELLON AUDITORIUM
WASHINGTON, DISTRICT OF COLUMBIA

ROBERT C. WEAVER FEDERAL BUILDING
U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT
WASHINGTON, DISTRICT OF COLUMBIA

NANCY HANKS CENTER –
OLD POST OFFICE BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

ARIEL RIOS FEDERAL BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

FEDERAL TRADE COMMISSION BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

U.S. TAX COURT BUILDING
WASHINGTON, DISTRICT OF COLUMBIA

THE PRESIDENT'S GUEST HOUSE –
BLAIR HOUSE
WASHINGTON, DISTRICT OF COLUMBIA

LAFAYETTE BUILDING
WASHINGTON, DISTRICT OF COLUMBIA



United States Capitol



United States Capitol



United States Capitol



United States Capitol



United States Capitol



United States Capitol



Robert F. Kennedy Department of Justice Building, Washington, D.C.: seamless modernization of a Federal Triangle Art Deco landmark.

2006

Howard M. Metzenbaum U.S. Courthouse (Preservation): sustainable modernization project that restored historic materials and captured underutilized courtyard space to meet new security queuing and circulation needs;

Internal Revenue Service Center, Kansas City, Missouri (Lease Construction): restoration and redevelopment of the city's Main Post Office property in the city's historic central business; and

Two Stewardship Reports (*Held in Public Trust* and *Extending the Legacy*) (Graphic Design): compelling design commands attention for important educational messages.

ADVOCACY AND EDUCATION PARTNERSHIPS

Between 2005 and 2008, GSA collaborated with a number of public and private nonprofit organizations to increase public benefit from GSA's compliance activities:

AFRICAN BURIAL GROUND, NEW YORK, NEW YORK

In 2003, GSA's Northeast/Caribbean Region cooperated with the Schomburg Center for Research in Black Culture to create a respectful and symbolic reinterment ceremony and exhibit on an archeological burial ground discovery that redefined the nation's understanding of slavery and African culture in colonial America. The African Burial Ground National Monument, located on the site of GSA's planned federal office building at 290 Broadway in lower Manhattan, is now under the jurisdiction of the National Park Service, which is working with GSA to develop an interpretive center within the lobby of the building at 290 Broadway, adjacent to the burial ground memorial. The government's intent for the interpretive center is to enlighten visitors about the historical, archeological, and cultural findings surrounding the burial ground and New York's ancestral African community.

CLARA BARTON MISSING SOLDIERS OFFICE DISCOVERY, WASHINGTON, D.C.

In 2007 GSA's Center for Historic Buildings began a collaboration with the American Red Cross and National Park Service to interpret Clara Barton's Civil War apartment and Missing Soldiers Office in a nineteenth-century commercial building and boardinghouse previously owned by GSA at 437 Seventh Street, N.W., in Washington, D.C. GSA holds a preservation easement on the building's significant spaces, with direct responsibility for their long-term stewardship and interpretation.



SIGN RECOVERED FROM THE SITE OF CLARA BARTON'S CIVIL WAR OFFICE, DISCOVERED IN A NINETEENTH-CENTURY ROW HOUSE ACQUIRED BY GSA FROM THE FORMER PENNSYLVANIA AVENUE DEVELOPMENT CORPORATION. PRIVATE REDEVELOPMENT WILL PRESERVE THE ROOMS AS MUSEUM SPACE.

To assist GSA in determining the likely style and layout of historic furnishings used by Barton, the National Park Service provided period photos showing how Clara Barton furnished her Red Cross disaster relief quarters and work spaces in the years immediately following her occupancy on Seventh Street. The photographs provide a wealth of detail on Clara Barton's tastes and how she lived and worked, enabling an authentic recreation of the historic appearance of the Missing Soldiers Office. Additional documents provided by the National Park Services include excerpts from Barton's diaries pertaining to the space, copies of Civil War-era newspaper articles describing her Seventh Street rooms, and digitized images of Barton's requests for President Lincoln's support, along with her congressional appropriation document and final report. Red Cross staff provided extensive information on Barton's early work establishing the American Red Cross, along with historic Red Cross posters and photographs evidencing Barton's worldwide impact as an originator of global disaster relief.

AMY BIEHL SCHOOL, ALBUQUERQUE, NEW MEXICO

In 2005 the Amy Biehl charter school collaborated with GSA to develop an educational program focused on the charter school's outlease of GSA's U.S. Courthouse in Albuquerque, New Mexico, as a model for sustainable reuse of public buildings. Presented at the 2005 National Preservation Conference, the program detailed how a charter school in a public building offering limited school-related amenities was cooperating with nearby institutions and businesses to meet educational requirements. GSA's regional asset manager discussed how GSA tailored its outlease, and school leaders outlined the benefits of providing daily opportunities for students to venture out from the historic federal building to meet educational requirements, conducting research at the nearby downtown library, attending art classes at a downtown cultural center, and meeting physical education standards at the local community center. The school's preservation and urban advocacy message was well received, prompting the National Trust to recognize GSA and the school in a national award for Federal Partnerships in Historic Preservation in 2006.

GSA PRESERVATION STRATEGY AND TECHNIQUES TRAINING

GSA has undertaken both broad and focused training programs to improve the stewardship skills of project teams and facilities staff. Training venues such as project manager workshops, courthouse project workshops, and facilities management conferences have provided opportunities to educate project managers, facilities staff, and realty specialists about the importance of early and meaningful Section 106 consultation in the context of their program responsibilities and goals.

The Center also sponsors periodic nationwide compliance training. Regional training recently developed through an interagency agreement with the Advisory Council on Historic Preservation focuses on NHPA

compliance challenges commonly encountered in GSA projects and exemplary GSA project solutions that exceeded minimum compliance requirements to meet the intent of the NHPA. Most regional preservation programs also provide general and technical training for portfolio management, project development, and facilities management associates.

Center-sponsored annual training for Regional Historic Preservation Officers has a deliberate participatory emphasis with regional case study presentations, briefings from business-line leadership, interactive discussion on critical issues, and solutions exchange.

INTERAGENCY, PROFESSIONAL, AND ACADEMIC STEWARDSHIP PROGRAMS

GSA contributes substantively to intergovernmental, nonprofit, professional, and academic stewardship programs, as an organizational leader, advisor, award juror, author, speaker, and employer. GSA preservation program associates nationwide serve as board members in professional and nonprofit associations, chair task groups, author books and articles, and represent GSA as speakers at professional conferences, symposia, and other educational events. GSA sponsors preservation interns through the National Council for Preservation Education and the International Council for the Preservation of Monuments and Sites and assists other agencies in developing position descriptions, evaluation criteria, and program guidelines by readily sharing its own successful models.

National Preservation Conference

GSA has been a major sponsor of the National Trust for Historic Preservation's annual preservation conference since 2000. As such, GSA has the opportunity to highlight its ongoing preservation initiatives through conference field sessions and plenary presentations. The PBS Commissioner has represented GSA before the event's national audience as a plenary or keynote speaker. GSA sponsors a booth at the conference exhibit showcasing landmark public buildings and stewardship successes.

At the 2005 conference in Portland, Oregon, GSA coordinated a tour and educational session on GSA's controversial seismic upgrade of Portland's 1875 Pioneer Courthouse and a second educational session on GSA's outlease of the 1908 U.S. Post Office and Courthouse in Albuquerque, New Mexico, to the Amy Biehl charter school. The 2006 conference in Pittsburgh, Pennsylvania, included a GSA session promoting court expansion approaches that supplement, rather than replace, historic federal courthouses. In 2007, GSA presented a case study on its preservation-minded approach to modernizing the mid-century Modern Warren Burger Courthouse in Minneapolis, Minnesota. GSA Commissioner David Winstead is scheduled to deliver a plenary speech at the 2008 conference in Tulsa, Oklahoma. GSA will also be showcasing sustainable preservation projects throughout the state.

Association for Preservation Technology International Conferences

GSA maintains close collegial relations with professional preservation organizations, particularly the Association for Preservation Technology (APT), the principal international group concerned with the advancement of technology related to the preservation of historic buildings, artifacts, and landscapes. Since 1968, APT has provided a forum for exchanging information about new technologies and approaches for the care and active use of historic buildings and sites. GSA associates have served as board members in APTI, published technical papers in APT's quarterly *Bulletin*, and presented GSA prototypes and project achievements at annual conferences.

In November 2004, GSA and the National Park Service partnered with APT to sponsor a symposium on "Design Excellence and Preservation Standards," at APT's annual conference in Galveston, Texas. GSA contributed two articles to conference proceedings published in 2006. "Designing for Building Performance: Management of Change" focused on sustainable approaches for meeting new requirements and performance standards at historic buildings. "Responding to Context: Changing Perspectives on Appropriate Change in Historic Settings" showcased a GSA courthouse annex project in Scranton, Pennsylvania, that restored the city civic center's cohesive scale and character and Moshe Safdie's Springfield, Massachusetts, courthouse, artfully designed in response to historic landscape features and streetscape conditions in the surrounding historic district.

GSA presented a session at APT's 2006 conference in Atlanta, Georgia, on the GSA's philosophical and practical approach to upgrading mid-century Modern office buildings, including an original architect's perspective showcasing Victor Lundy's recently designated U.S. Tax Court Building in Washington, D.C.



RECAPTURE FEDERAL INVESTMENT IN HIGH-QUALITY ARCHITECTURE
BY REINVESTING TO KEEP HISTORIC PUBLIC BUILDINGS FUNCTIONAL AND SAFE

S U C C E S S S T O R Y

**HOWARD M. METZENBAUM
U.S. COURTHOUSE
CLEVELAND, OHIO**

BY REINVESTING IN FEDERALLY OWNED HISTORIC BUILDINGS, GSA ENSURES THAT WELL-CONSTRUCTED PUBLIC BUILDINGS OF HIGH ARCHITECTURAL MERIT CAN CONTINUE TO SERVE A TWENTY-FIRST-CENTURY WORKFORCE. OUR CHIEF INVESTMENTS ARE IN SAFETY, BUILDING SYSTEMS IMPROVEMENTS, AND EXTERIOR MAINTENANCE. GSA STRIVES TO PRESERVE THE QUALITIES THAT CONTRIBUTE TO EACH BUILDING'S SIGNIFICANCE THROUGH LOW INTERVENTION REPAIR APPROACHES AND SELECTIVE RESTORATION. THE HOWARD M. METZENBAUM U.S. COURTHOUSE MODERNIZATION IN CLEVELAND RESTORES CEREMONIAL AREAS WHILE CREATING SECURE QUEUING SPACE BY UTILIZING AN EXISTING COURTYARD. PREVIOUSLY REMOVED ORIGINAL MURALS WILL BE REINSTALLED WITHIN THE NEWLY CREATED ENTRYWAY.

HOWARD M. METZENBAUM U.S. COURTHOUSE
CLEVELAND, OH, 1903-1910



CONCLUSION

Held in Public Trust: PBS Strategy for Using Historic Buildings and *Extending the Legacy: GSA Historic Building Stewardship* sought to bring preservation up to speed with GSA's emerging business approach to providing and maintaining federal work space. Over the past several years, the business strategy has shifted from lowering rehabilitation expectations to be more in line with available funding, to selectively pruning the inventory of under-performing properties so that investment can be directed to profitable and potentially profitable properties. While applying a more rigorous viability standard to historic buildings, the strategy shift has ultimately brought into sharper focus the vision articulated in *Held in Public Trust* and reiterated in *Extending the Legacy*—establishing clear and defensible priorities for historic building retention, reuse, and reinvestment.

GSA's *Legacy Vision* restates the agency's commitment to balancing sound fiscal management with public interest in maintaining the nation's cultural heritage. The *Legacy Vision* also affirms the Public Building Service's commitment to maintaining an appropriate federal presence in hundreds of towns and cities where the government interacts directly with American citizens. In making a commitment to give first preference to using those buildings that best represent America's public building legacy, GSA acknowledges its critical role in shaping the future of the federal presence. Equally important, the *Legacy Vision* conveys a realistic awareness of the need to focus on preserving what's most important.

Despite some tangible successes repositioning financially troubled Legacy buildings to perform better, there remain endemic viability challenges that will continue to reduce GSA's historic building inventory, especially among GSA's oldest buildings, most of which are smaller historic buildings that are the principal federal presence in many small towns. Not only are the smaller historic buildings unable to achieve the operational and rehabilitation economies of scale that larger buildings do, but they are more likely to be located in remote or depopulating areas where market-based rents are insufficient to fund appropriate care and reinvestment. Market-based rent rates will continue to constrain reinvestment in landmark federal buildings located within depressed central business areas.

As federal Legacy buildings are increasingly turned over to local governments for their use, recasting the traditional "federal" presence as the "municipal" presence, stately architectural reminders of the federal

government's role in the daily lives of American citizens may become ever more remote to those citizens living outside of the country's most populous, thriving real estate markets.

Promising counter trends include the continuing commitment of many GSA's tenants to remain in the historic buildings constructed for their use or with which they are strongly associated. Within this group, the agencies most consistently committed to sustaining the federal government's public building Legacy hold "heritage tenancies" in historic buildings constructed specifically for them. Principal heritage tenancies include custom houses, courthouses, and cabinet agency headquarters.

Prestige tenants, whose missions call for a ceremonial presence and who benefit from gracious public space and dignified surroundings symbolizing the importance of the services they perform, are also important to the future of America's monumental public building legacy. GSA's principal prestige tenants are the federal courts, which repeatedly demonstrate not only a commitment to preserving and using historic courthouses, but a willingness to put important nonfederal historic buildings to use. Court support functions, such as attorneys, are also well suited to historic interiors because of the need for traditional closed office space. From Tacoma, Washington, where the courts occupy a Beaux Arts train station that includes a grand rotunda designated for public use, to Natchez, Mississippi, where a shrinking court presence insufficient to support a 1930s federal building in Vicksburg, Mississippi, created an opportunity to put the city's temple-fronted 1850s Memorial Hall to use, stewardship-minded tenants have made GSA—and the federal government—a preservation hero in historic American communities.

Fortunately, the future viability of GSA's historic building inventory does not depend entirely on prestige tenants and heritage tenancies, though the role they play in keeping historic buildings occupied and generating revenue is important. Newly emerging as leaders in the reuse of high-profile public buildings are agencies such as the Internal Revenue Service that find opportunities in inventory restructuring or relocation efforts to reinvigorate historic business areas by consolidating in major community landmarks such as Kansas City's historic downtown post office, the historic warehouse district at Ogden, Utah, and Philadelphia's historic main post office.

The federal government's long-term ability to use historic buildings will depend upon the commitment of both GSA and its client agencies to meet space needs in imaginative and sometimes unique ways. Only a willingness to consider novel solutions for achieving the intent of mandated standards and template space layouts will enable the Public Buildings Service to maintain a rich and diverse inventory reflecting the nation's public building heritage. Two factors are key: (1) GSA and tenant willingness to expand by constructing additions and annexes to existing Legacy buildings, rather than disposing of them to construct monolithic new buildings; and (2) willingness among GSA's downsized or relocating tenants to consider adapting available historic buildings to meet their needs.

Beyond the financial obstacles of market-based rents and declining occupancies driven by changing demographics, among the greatest challenges to acquisition, leasing, and continued use of historic buildings are prohibitively expensive rehabilitation requirements dictated by contemporary seismic codes and security standards. Commercial Return on Investment criteria requiring every building to “stand on its own” often does not support retention of historic buildings in which compliance costs are driven higher by the need for costlier retrofit technologies and more complex designs to preserve significant historic interiors. Possible solutions include seeking a special appropriation targeting Legacy buildings in high seismic-risk zones and refining our business strategy to consider the overall profitability of the Legacy building inventory, as well as that of individual buildings, to get a broader picture of its financial health. This need not amount to letting underperforming buildings “off the hook” where financial accountability is concerned. It could, though, allow strong performers to support continued use of Legacy buildings for which there is a federal space need, where appropriate viability measures have been applied to rectify obvious inefficiencies, and specific, insurmountable obstacles to reinvestment—such as the cost of base isolation for seismic protection—still remain.

Security-related impediments to acquisition and reuse of space in historic buildings include standoff (street setback) and building-hardening requirements. The costs of retrofitting historic building exteriors located close to the public right-of-way to meet current blast-resistance requirements will preclude reuse of many small ceremonial historic buildings where charging Return on Investment rents is not possible. As the government comes to grips with the cost of applying security standards along with the social costs of abandoning small town and city centers, standards may eventually be developed to factor additional locational variables into the risk equation, waiving or reducing window-hardening requirements in relatively remote, low-risk locations.

Ensuring the continued viability of the historic building inventory will also depend on the willingness of GSA's tenants and preservation oversight agencies to explore a wider range of rehabilitation approaches that take into account not only building character and merit, but also the economic conditions of a particular location as they affect available funding and space utilization. For GSA-owned historic buildings, it is no longer a question of whether or not to preserve, or even what is appropriate to preserve, but how much can be accomplished with available funds to keep a historic building viable for continued federal use. This doesn't mean excusing poor project planning or failure to secure qualified design teams to develop appropriate preservation design solutions, but it may mean exploring hybrid space layouts that preserve principal public spaces and arteries, with thoughtful modifications to increase overall space utilization and porosity as achieved in the prototype studio layout for the Office of the Chief Architect at GSA headquarters in Washington, D.C.

A growing preservation issue is the future of GSA's aging Modern-era building inventory. As preservation and community advocates express increased interest in these buildings, GSA will face new technical and economic challenges ranging from how to affordably rehabilitate materials and assemblies designed to last twenty-five years, to the fiscal and philosophical appropriateness of doing so, compared to reinvestment in older, architecturally exceptional buildings. Anticipated challenges include the need to avoid project-stalling controversies by involving community advocates while maintaining a balanced perspective on the relative merit of the buildings in question and current knowledge on intervention options. GSA ensures that the value of these assets is not eroded by the cumulative impact of individual alterations by assisting GSA architects and facilities staff in approaching repair and alteration projects within these buildings contextually, with the goal of maintaining overall design cohesiveness.

All of these issues underscore the importance of sustaining a well-integrated organization in which practice guides policy, execution informs design, collaboration is encouraged, and institutional memory is shared, built upon, and made as accessible as possible. In the first years of the new millennium, GSA made tremendous strides toward building an institutional knowledge bank of best preservation practices, raising the professionalism and effectiveness of its preservation staff nationwide, and bringing its preservation policies and procedures up-to-date with current laws and the agency's business strategy for accomplishing its mission. GSA is now recognized as a leader among federal agencies, ahead of the curve on challenging preservation issues, and a major contributor to the preservation profession in the areas of design, technology, advocacy, and policy.

GSA is also pleased to have a solution in hand for addressing its National Register nomination backlog. In this respect, the issuance of Executive Order 13287 *Preserve America* is well timed. Informed by its perspective as a service provider, GSA has developed an impressive array of automated systems and analytical methods to assess the physical and financial condition of its buildings and to generate information about the inventory as a whole. Important next steps are to better link these information sources and to upgrade existing databases so as to meet the specific reporting requirements of E.O. 13287 more efficiently. The Building Preservation Plan database, for instance, was conceived as a set of easy-to-access, uniform, updatable preservation planning guides for individual historic buildings, not as a means by which to generate statistics on the historic building inventory as a whole. As a database, however, it has a report generating capability and is being modified to serve both purposes.

In this second follow-up to GSA's E.O. 13287 baseline report, a pattern is being established for ongoing self-assessment so that GSA can continue to examine the effectiveness of its stewardship strategy and refocus its efforts accordingly. The speed and effectiveness with which these challenges are met will depend on continued communication among agency leadership and project teams with GSA's nationwide preservation staff, continued development of useful guidance tools and online information support, and compelling and continual preservation advocacy.

- [1] Source: GSA September 2007 R240 Report (Real Property Asset Management) and GSA Building Preservation Plan database. R240 count does not include all St. Elizabeths buildings.
- [2] Based loosely on OMB 2000 statistical area standards for Census reporting, adjusted to provide additional classification thresholds for smaller population areas that, while not meeting Census thresholds (10,000 for Core-based Area), are commonly organized around a town center. Statistical areas in this report are defined as follows: metropolitan: 500,000+; small city: 100,000-under 500,000; towns: 10,000-under 100,000 (large) and 2,000-under 10,000 (small); and remote: under 2000.
- [3] A majority of these World War II era buildings, historically constructed for military industrial uses such as war ship and weapons manufacturing, originally lacked distinction (having been constructed as temporary buildings) or have been substantially altered and do not appear to meet National Register eligibility criteria. Those buildings formally determined ineligible or determined by GSA as not likely to be eligible are excluded from the historic building inventory statistics referenced throughout this report.
- [4] General Jess Larson, General Counsel to the War Assets Administration, 1946-47, Administrator of the War Assets Administration, 1947-49, and first GSA Administrator, 1949-53. Interview conducted by Jerry N. Hess, May-June, 1967 for the Truman Presidential Library.
- [5] Appropriated funding for recurring repairs and alterations below the prospectus threshold (BA 54), multiplied by a factor of 25%, representing the proportion of the national inventory that historic buildings make up in gross floor area
- [6] GSA Real Property Asset Management guidelines stipulate that outleases must be of limited terms, for compatible tenants, and in the government's financial interest to ensure that leases do not tax the Federal Building Fund. Outleases may be used as a temporary holding strategy, provided there is a reasonable likelihood of a future federal use.
- [7] Leases identified by available STAR data and a survey of Regional Realty Specialists, reported in "GSA Historic Building Leasing," GSA Historic Buildings and the Arts, June 2000; updated in 2007 using current STAR data.
- [8] The preference allows an additional 10 percent lease cost, to compensate for the additional expense of conforming to Secretary of Interior Rehabilitation Standards, as required by the NHPA and to comply with NHPA mandates requiring the government to give first consideration to using historic buildings to meet agency space needs.
- [9] Building data for FFO, rental rate, vacancy rate, operating expenses, repair needs and building value were provided by the Office of Information Resource Management. Customer Satisfaction scores were supplied by the Office of Business Performance, Business Measures Division.
- [10] Market rental rates and operating expenses were not readily available. Funds from Operations (FFO) has been substituted as the financial performance measure.
- [11] See 6.
- [12] "Legacy properties," an internal GSA designation to establish retention and reinvestment priority, includes monumental buildings containing ceremonial interior space and other significant historic buildings best representing the Federal public building legacy. Regulatory compliance with preservation laws and directives is triggered by National Register eligibility, regardless of a property's standing as a legacy or non-legacy building within GSA.
- [13] Disposal programs in Regions 1, 4, 7, 9, 10, and 11 handle regional disposals and disposal of excess property in Regions 2, 3, 5, 6, and 8.
- [14] Reliance on the nearby Main Interior Building for chilled water prevented the fan coil units from functioning at times when the Interior building was not programmed for cooling. An independent chiller was subsequently installed to enable individual workstation cooling for employees working on weekends when ambient temperatures are maintained at higher, off-hours levels during the summer. Use of existing building rain leaders eliminated the cost of installing draining lines. Early flooding revealed a need to install valves to prevent backflow into workspace during heaving rain. Flooding ceased when the valves were installed.

PHOTOGRAPHS

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Photography

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GSA'S HISTORIC BUILDINGS

NEW ENGLAND REGION
CT, ME, MA, NH, RI, VT

WILLIAM R. COTTER FEDERAL BUILDING
135 HIGH STREET
HARTFORD, CT 06103
CT0013ZZ

RICHARD C. LEE U.S. COURTHOUSE
CHURCH & COURT STREETS
NEW HAVEN, CT 06510
CT0024ZZ

JOHN W. MCCORMACK
U.S. POST OFFICE & COURTHOUSE
POST OFFICE SQUARE
BOSTON, MA 02109
MA0013ZZ

U.S. CUSTOM HOUSE
37 N. 2ND STREET
NEW BEDFORD, MA 02740
MA0076ZZ

HAROLD D. DONOHUE
FEDERAL BUILDING & U.S. COURTHOUSE
8595 MAIN STREET
WORCESTER, MA 01601
MA0113ZZ

JOHN F. KENNEDY FEDERAL BUILDING
GOVERNMENT CENTER
BOSTON, MA 02203
MA0131ZZ

U.S. BORDER STATION
MILLTOWN
CALAIS, ME 04619
ME0009ZZ

EDWARD T. GIGNOUX U.S. COURTHOUSE
156 FEDERAL STREET
PORTLAND, ME 04111
ME0034ZZ

U.S. CUSTOM HOUSE
312 FORE STREET
PORTLAND, ME 04111
ME0035ZZ

U.S. BORDER STATION
FERRY POINT
CALAIS, ME 04619
ME0501BC

U.S. BORDER STATION GARAGE
FERRY POINT
CALAIS, ME 04619
ME0503BC

U.S. BORDER STATION
STATE ROUTE 27
COBURN GORE, ME 04936
ME0551BE

U.S. CUSTOMS RESIDENCE
STATE ROUTE 27
COBURN GORE, ME 04936
ME0552BE

U.S. IMMIGRATION RESIDENCE
STATE ROUTE 27
COBURN GORE, ME 04936
ME0553BE

U.S. BORDER STATION
BOUNDARY LINE ROAD
FORT FAIRFIELD, ME 04742
ME0601BF

U.S. BORDER STATION
STATE ROUTE 229
LIMESTONE, ME 04750
ME0701BL

U.S. BORDER STATION
U.S. ROUTE 1
ORIENT, ME 04471
ME0751BT

U.S. BORDER STATION GARAGE
U.S. ROUTE 1
ORIENT, ME 04471
ME0752BT

FEDERAL OFFICE BUILDING
719 MAIN STREET
LACONIA, NH 03246
NH0010ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
1 EXCHANGE TERRACE
PROVIDENCE, RI 02903
RI0009ZZ

JOHN O. PASTORE FEDERAL BUILDING
EXCHANGE TERRACE
PROVIDENCE, RI 02903
RI0010ZZ PARTIAL

U.S. BORDER STATION
STATE ROUTE 102
BEECHER FALLS, VT 05902
VT0002ZZ

U.S. BORDER STATION
STATE ROUTE 102
CANAAN, VT 05903
VT0007ZZ

U.S. BORDER STATION
STATE ROUTE 105
EAST RICHFORD, VT 05476
VT0008ZZ

U.S. BORDER STATION
STATE ROUTE 139
RICHFORD, VT 05476
VT0014ZZ

FEDERAL BUILDING,
U.S. CUSTOM HOUSE & POST OFFICE
56 S. MAIN ST
ST. ALBANS, VT 054178
VT0018ZZ

U.S. BORDER STATION
U.S. HIGHWAY
ALBURG SPRINGS, VT 05440
VT0551BS

U.S. BORDER STATION GARAGE
U.S. HIGHWAY 2
ALBURG SPRINGS, VT 05440
VT0552BS

U.S. BORDER STATION
MAIN STREET
BEEBE PLAIN, VT 05823
VT0601BP

U.S. BORDER STATION
U.S. ROUTE 5
DERBY LINE, VT 05830
VT0651PD

U.S. BORDER STATION GARAGE
U.S. ROUTE 5
DERBY LINE, VT 05830
VT0652PD

U.S. BORDER STATION CATTLE SHED
U.S. ROUTE 5
DERBY LINE, VT 05830
VT0653PD

U.S. BORDER STATION
STATE ROUTE 105 AT CAN. BDR.
NORTH TROY, VT 05859
VT0751BT

U.S. BORDER STATION
STATE ROUTE 114
NORTON, VT 05907
VT0801BN

U.S. BORDER STATION
STATE ROUTE 108
WEST BERKSHIRE, VT 05493
VT0851BW

**NORTHEAST AND
CARRIBEAN REGION**
NJ (NORTHERN), NY, PR, VI

FEDERAL BUILDING
20 WASHINGTON PLACE
NEWARK, NJ 07102
NJ0056ZZ

JAMES T. FOLEY
U.S. POST OFFICE & COURTHOUSE
445 BROADWAY
ALBANY, NY 12207
NY0002ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
15 HENRY STREET
BINGHAMTON, NY 13902
NY0016ZZ

MICHAEL J. DILLON U.S. COURTHOUSE
68 COURT STREET
BUFFALO, NY 14202
NY0026ZZ

U.S. BORDER STATION
STATE ROUTE 37
FORT COVINGTON, NY 12937
NY0059ZZ PARTIAL BPP

THURGOOD MARSHALL U.S. COURTHOUSE
40 FOLEY SQUARE
NEW YORK, NY 10007
NY0130ZZ

ALEXANDER HAMILTON U.S. CUSTOM
HOUSE
1 BOWLING GREEN
NEW YORK, NY 10004
NY0131ZZ

U.S. BORDER STATION
STATE ROUTE 276
ROUSES POINT, NY 12979
NY0196ZZ

U.S. BORDER STATION
STATE ROUTE 9B
ROUSES POINT, NY 12979
NY0197ZZ

U.S. BORDER STATION
STATE ROUTE 30
TROUT RIVER, NY 13847
NY0216ZZ

ALEXANDER PIRNIE FEDERAL BUILDING
10 BROAD STREET
UTICA, NY 13501
NY0218ZZ

U.S. POST OFFICE & COURTHOUSE
271 CADMAN PLAZA, E.
BROOKLYN, NY 11201
NY0234ZZ

AFRICAN BURIAL GROUND MEMORIAL
DUANE AND ELK STREETS
NEW YORK, NY 10007
NY0370ZZ

AGRICULTURAL PROCESSING STATION
193 MERIDIAN ROAD
CHAMPLAIN, NY 12919
NY0576CB

AGRICULTURAL INSPECTION STATION/
OLD BORDER STATION
193 MERIDIAN ROAD
CHAMPLAIN, NY 12919
NY0579CB

U.S. BORDER STATION
INSPECTION BUILDING
STATE ROUTE 374
CHATEAUGAY, NY 12920
NY0586C1

U.S. BORDER STATION
INSPECTION BUILDING
STATE ROUTE 22
MOGERS, NY 12958
NY0626MI

ROBERT C. MCEWAN U.S. CUSTOM HOUSE
127 N. WATER STREET
OGDENSBURG, NY 13669
NY0651OC

JOSE V. TOLEDO
FEDERAL BUILDING & U.S. COURTHOUSE
COMMERCIO & SAN JUSTO
SAN JUAN, PR 00901
PR0003ZZ

MID-ATLANTIC REGION

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APPRAISERS STORES
103 S. GAY STREET
BALTIMORE, MD 21202
MD0003ZZ

U.S. CUSTOM HOUSE
40 S. GAY STREET
BALTIMORE, MD 21202
MD0006ZZ

MAUDE R. TOULSON FEDERAL BUILDING
129 E. MAIN STREET
SALISBURY, MD 21801
MD0033ZZ

MITCHELL H. COHEN
U.S. POST OFFICE & COURTHOUSE
401 MARKET STREET
CAMDEN, NJ 08101
NJ0015ZZ

CLARKSON S. FISHER U.S. COURTHOUSE
402 E. STATE STREET
TRENTON, NJ 08608
NJ0088ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
617 STATE STREET
ERIE, PA 16501-1196
PA0064ZZ

ROBERT N.C. NIX
FEDERAL BUILDING & U.S. COURTHOUSE
900 MARKET STREET
PHILADELPHIA, PA 19107
PA0143ZZ

U.S. CUSTOM HOUSE
200 CHESTNUT STREET
PHILADELPHIA, PA 19106
PA0144ZZ

U.S. POST OFFICE & COURTHOUSE
700 GRANT STREET
PITTSBURGH, PA 15219-1906
PA0158ZZ

WILLIAM J. NEALON U.S. COURTHOUSE
235 N. WASHINGTON AVENUE
SCRANTON, PA 18503
PA0182ZZ

MAIN LIBRARY
3 S. PARK ROW
ERIE, PA 16501
PA0644ZZ

THE BAKER BUILDING
18 E. 7TH STREET
ERIE, PA 16501
PA0776ZZ

C. BASCOM SLEMP FEDERAL BUILDING
322 E. WOOD AVENUE
BIG STONE GAP, VA 24219
VA0020ZZ

OWEN B. PICKETT U.S. CUSTOM HOUSE
101 MAIN STREET
NORFOLK, VA 23501
VA0053ZZ

WALTER E. HOFFMAN U.S. COURTHOUSE
600 GRANBY STREET
NORFOLK, VA 23501
VA0054ZZ

LEWIS F. POWELL, JR.
U.S. COURTHOUSE ANNEX
1100 EAST MAIN STREET
RICHMOND, VA 23219
VA0062ZZ

LEWIS F. POWELL, JR. U.S. COURTHOUSE
1000 E. MAIN STREET
RICHMOND, VA 23219
VA0063ZZ

U.S. COURTHOUSE
116 N. MAIN STREET
HARRISONBURG, VA 22801
VA0686ZZ

ELIZABETH KEE FEDERAL BUILDING
601 FEDERAL STREET
BLUEFIELD, WV 24701
WV0003ZZ

FOREST SERVICE BUILDING
200 SYCAMORE STREET
ELKINS, WV 26241
WV0010ZZ

SIDNEY L. CHRISTIE FEDERAL BUILDING
845 5TH AVENUE
HUNTINGTON, WV 25701
WV0016FP

FEDERAL BUILDING & U.S. COURTHOUSE
1125 CHAPLINE STREET
WHEELING, WV 22100
WV0047ZZ

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FEDERAL BUILDING & U.S. COURTHOUSE
1129 NOBLE STREET
ANNISTON, AL 36201
AL0004ZZ

ROBERT S. VANCE
FEDERAL BUILDING & U.S. COURTHOUSE
1800 5TH AVENUE, N.
BIRMINGHAM, AL 35203
AL0011ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
100 W. TROY STREET
DOTHAN, AL 36301
AL0019ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
600 BROAD STREET
GADSDEN, AL 35901
AL0028ZZ

U.S. POST OFFICE & COURTHOUSE
101 HOLMES AVENUE
HUNTSVILLE, AL 35801
AL0034ZZ

JOHN A. CAMPBELL U.S. COURTHOUSE
113 S. JOSEPH STREET
MOBILE, AL 36602
AL0039AB

FRANK M. JOHNSON, JR.
FEDERAL BUILDING & U.S. COURTHOUSE
15 LEE STREET
MONTGOMERY, AL 36104
AL0043ZZ

GEORGE W. ANDREWS
FEDERAL BUILDING & U.S. COURTHOUSE
701 AVENUE A
OPELIKA, AL 36801
AL0046ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
908 ALABAMA AVENUE
SELMA, AL 36701
AL0055ZZ

U.S. POST OFFICE,
COURTHOUSE & CUSTOM HOUSE
301 SIMONTON STREET
KEY WEST, FL 33040
FL0019ZZ

DAVID W. DYER
FEDERAL BUILDING & U.S. COURTHOUSE
300 N.E. 1ST AVENUE
MIAMI, FL 33101
FL0029AD

U.S. COURTHOUSE
100 N. PALAFOX STREET
PENSACOLA, FL 32502
FL0039ZZ

U.S. COURTHOUSE
110 E. PARK AVENUE
TALLAHASSEE, FL 32301
FL0049ZZ

U.S. POST OFFICE & COURTHOUSE
115 HANCOCK AVENUE
ATHENS, GA 30601
GA0005ZZ

MARTIN LUTHER KING, JR.
FEDERAL BUILDING
77 FORSYTH STREET
ATLANTA, GA 30303
GA0007ZZ

ELBERT PARR TUTTLE
U.S. COURT OF APPEALS
56 FORSYTH STREET
ATLANTA, GA 30303
GA0008ZZ

U.S. COURTHOUSE
500 E. FORD STREET
AUGUSTA, GA 20309
GA0009ZZ

U.S. POST OFFICE & COURTHOUSE
12TH STREET & 2ND AVENUE
COLUMBUS, GA 31902
GA0025ZZ

J. ROY ROWLAND U.S. COURTHOUSE
100 N. FRANKLIN STREET
DUBLIN, GA 31021
GA0036ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
126 WASHINGTON STREET, S.E.
GAINESVILLE, GA 30501
GA0044ZZ

WILLIAM AUGUST BOOTLE
FEDERAL BUILDING & U.S. COURTHOUSE
475 MULBERRY STREET
MACON, GA 31202
GA0057ZZ

U.S. CUSTOM HOUSE
1-3 EAST BAY STREET
SAVANNAH, GA 31402
GA0076ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
125-127 BULL STREET
SAVANNAH, GA 31402
GA0078ZZ

FRANK M. SCARLETT FEDERAL BUILDING
805 GLOUCESTER STREET
BRUNSWICK, GA 31520
GA0103ZZ

SAM NUNN ATLANTA FEDERAL CENTER
100 ALABAMA STREET, SW
ATLANTA, GA
GA1007ZZ

GNANN HOUSE
1 WOODLAND DRIVE
PLAINS, GA 31780
GA2637ZZ

WILLIAM H. NATCHER
FEDERAL BUILDING & U.S. COURTHOUSE
242 E. MAIN STREET
BOWLING GREEN, KY 42101
KY0006ZZ

U.S. POST OFFICE & COURTHOUSE
101 BARR STREET
LEXINGTON, KY 40507
KY0042ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
300 S. MAIN STREET
LONDON, KY 40741
KY0043ZZ

GENE SNYDER
U.S. COURTHOUSE & CUSTOM HOUSE
601 W. BROADWAY
LOUISVILLE, KY 40202
KY0045ZZ

FEDERAL BUILDING,
U.S. POST OFFICE & COURTHOUSE
423 FEDERICA STREET
OWENSBORO, KY 42301
KY0058ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
501 BROADWAY
PADUCAH, KY 42001
KY0059ZZ

U.S. POST OFFICE & COURTHOUSE
102 MAIN STREET
PIKEVILLE, KY 41501
KY0062ZZ

MEMORIAL HALL
109 SOUTH PEARL
NATCHEZ, MS
MS0008ZZ

DAN M. RUSSELL JR COURTHOUSE ANNEX
2010 15TH STREET
GULFPORT, MS 39501
MS0009AA

JAMES EASTLAND FEDERAL BUILDING
245 E. CAPITOL STREET
JACKSON, MS 39205
MS0031ZZ

MISSISSIPPI RIVER COMMISSION BUILDING
1400 WALNUT STREET
VICKSBURG, MS 39180
MS0071ZZ

U.S. COURTHOUSE
100 OTIS STREET
ASHEVILLE, NC 28801
NC0005AE

U.S. POST OFFICE & COURTHOUSE
413-415 MIDDLE STREET
NEW BERN, NC 28360
NC0011ZZ

FEDERAL BUILDING,
U.S. COURTHOUSE & POST OFFICE
306 E. MAIN STREET
ELIZABETH CITY, NC 27909
NC0020ZZ

F. RICHARDSON PREYER FEDERAL BUILDING,
U.S. COURTHOUSE & POST OFFICE
324 W. MARKET STREET
GREENSBORO, NC 27401
NC0028ZZ

FEDERAL BUILDING
215 S. EVANS STREET
GREENVILLE, NC 27834
NC0029ZZ

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U.S. POST OFFICE
300 FAYETTEVILLE STREET
RALEIGH, NC 27601
NC0058ZZ

U.S. POST OFFICE & COURTHOUSE
200 W. BROAD STREET
STATESVILLE, NC 28677
NC0072ZZ

ALTON LENNON FEDERAL BUILDING
& U.S. COURTHOUSE
2 PRINCESS STREET
WILMINGTON, NC 28401
NC0085ZZ

FEDERAL BUILDING
320 FEDERAL PLACE
GREENSBORO, NC 27401
NC0090ZZ

CHARLES E. SIMONS, JR.
U.S. COURTHOUSE
223 W. PARK AVENUE
AIKEN, SC
SC0002ZZ

G. ROSS ANDERSON
FEDERAL BUILDING & U.S. COURTHOUSE
315 MCDUFFIE STREET
ANDERSON, SC 29261
SC0004ZZ

U.S. CUSTOM HOUSE
200 E. BAY STREET
CHARLESTON, SC 29403
SC0011ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
81 BROAD STREET
CHARLESTON, SC 29201
SC0012AC

J. BRATTON DAVIS U.S. COURTHOUSE
1100 LAUREL STREET
COLUMBIA, SC 29201
SC0018ZZ

C.F. HAYNSWORTH
FEDERAL BUILDING & U.S. COURTHOUSE
300 E. WASHINGTON STREET
GREENVILLE, SC 29601
SC0028ZZ

DONALD STUART RUSSELL
FEDERAL BUILDING & U.S. COURTHOUSE
201 MAGNOLIA STREET
SPARTANBURG, SC 29301
SC0041ZZ

STROM THURMOND FEDERAL BUILDING
1835 ASSEMBLY STREET
COLUMBIA, SC 29201
SC0068AA

STROM THURMOND U.S. COURTHOUSE
1845 ASSEMBLY STREET
COLUMBIA, SC 29201
SC0069AA

JOEL W. SOLOMON
FEDERAL BUILDING & U.S. COURTHOUSE
10TH STREET & GEORGIA AVENUE
CHATTANOOGA, TN 37403
TN0006ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
816 S. GARDEN STREET
COLUMBIA, TN 38401
TN0010ZZ

L. CLURE MORTON
U.S. POST OFFICE & COURTHOUSE
9 E. BROAD STREET
COOKEVILLE, TN 38501
TN0011ZZ

ED JONES
FEDERAL BUILDING & U.S. COURTHOUSE
109 S. HIGHLAND
JACKSON, TN 38301
TN0029ZZ

ESTES KEFAUVER FEDERAL BUILDING
801 BROADWAY
NASHVILLE, TN 37203
TN0052AA

GREAT LAKES REGION

IL, IN, MI, MN, OH, WI

U.S. CUSTOM HOUSE
610 S. CANAL STREET
CHICAGO, IL 60607
IL0032ZZ

FEDERAL BUILDING / RAILROAD
RETIREMENT BOARD
844 N. RUSH STREET
CHICAGO, IL 92409
IL0033ZZ

FEDERAL BUILDING
536 S. CLARK STREET
CHICAGO, IL 60605
IL0054ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
201 N. VERMILLION STREET
DANVILLE, IL 61832
IL0059ZZ

MELVIN PRICE U.S. COURTHOUSE
750 MISSOURI AVENUE
EAST ST. LOUIS, IL 62201
IL0069ES

FEDERAL BUILDING & U.S. COURTHOUSE
100 N.E. MONROE STREET
PEORIA, IL 61602
IL0154ZZ

FINDLEY FEDERAL BUILDING
600 E. MONROE STREET
SPRINGFIELD, IL 62701
IL0173ZZ

EVERETT M. DIRKSEN U.S. COURTHOUSE
219 S. DEARBORN STREET
CHICAGO, IL 60604
IL0205ZZ

U.S. POST OFFICE LOOP STATION
211 S. CLARK STREET
CHICAGO, IL 60604
IL0235FC

JOHN C. KLUCZYNSKI FEDERAL BUILDING
230 S. DEARBORN STREET
CHICAGO, IL 60604
IL0236FC

E. ROSS ADAIR
FEDERAL BUILDING & U.S. COURTHOUSE
1300 W. HARRISON STREET
FORT WAYNE, IN 46802
IN0031ZZ

BIRCH BAYH
FEDERAL BUILDING & U.S. COURTHOUSE
46 E. OHIO STREET
INDIANAPOLIS, IN 46204
IN0048ZZ

CHARLES A. HALLECK FEDERAL BUILDING
4TH & FERRY STREETS
LAFAYETTE, IN 47901
IN0057ZZ

ROBERT A. GRANT
FEDERAL BUILDING & U.S. COURTHOUSE
204 S. MAIN STREET
SOUTH BEND, IN 46601
IN0096ZZ

FEDERAL BUILDING
145 WATER STREET
ALPENA, MI 49707
MI0005ZZ

THEODORE LEVIN U.S. COURTHOUSE
231 W. LAFAYETTE STREET
DETROIT, MI 48826
MI0029ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
600 CHURCH STREET
FLINT, MI 48502
MI0048ZZ

FEDERAL BUILDING,
U.S. POST OFFICE & COURTHOUSE
410 W. MICHIGAN AVENUE
KALAMAZOO, MI 49006
MI0072ZZ

CHARLES CHAMBERLAIN FEDERAL
BUILDING
315 W. ALLEGAN STREET
LANSING, MI 48933
MI0073ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
525 WATER STREET
PORT HURON, MI 48060
MI0097ZZ

HART-DOLE-INOUYE FEDERAL CENTER
BUILDING 1
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0501BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 1A
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0502BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 2
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0503BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 2A
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0504BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 2B
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0505BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 2C
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0506BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 4
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0507BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 4A
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0508BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 5
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0509BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 6
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0510BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 28
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0524BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 30
CHAMPION & WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0525BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 7
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0526BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 8
CHAMPION & WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0527BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 20
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0528BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 22
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0529BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 23
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0530BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 24
74 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0531BC

HART-DOLE-INOUE FEDERAL CENTER
BUILDING 31
50 N. WASHINGTON AVENUE
BATTLE CREEK, MI 49017
MI0532BC

ROSA PARKS FEDERAL BUILDING
333 MT. ELLIOT STREET
DETROIT, MI 48207
MI0601DI

GERALD W. HEANEY FEDERAL BUILDING,
U.S. COURTHOUSE, & CUSTOM HOUSE
515 W. 1ST STREET
DULUTH, MN 55802
MN0015ZZ

U.S. POST OFFICE & COURTHOUSE
118 S. MILL STREET
FERGUS FALLS, MN
MN0021ZZ

FEDERAL BUILDING
212 3RD AVENUE, S.
MINNEAPOLIS, MN 55401
MN0036ZZ

U.S. CUSTOMS & IMMIGRATION STATION
NOYES, MN 56740
MN0521NB

CUSTOM AND IMMIGRATION STATION GARAGE
ROUTE 1, Box 112
NOYES, MN 56740
MN0522NB

FRANK T. BOW FEDERAL BUILDING
201 CLEVELAND AVENUE
CANTON, OH 44702
OH0023ZZ

POTTER STEWART U.S. COURTHOUSE
700 E. 5TH STREET
CINCINNATI, OH 44308
OH0028CN

HOWARD M. METZENBAUM
U.S. COURTHOUSE
201 SUPERIOR AVENUE, N.E.
CLEVELAND, OH 44114
OH0033ZZ

JOSEPH P. KINNEARY U.S. COURTHOUSE
85 MARCONI BOULEVARD
COLUMBUS, OH 43215
OH0046ZZ

DONALD J. PEASE FEDERAL BUILDING
143 W. LIBERTY STREET
MEDINA, OH 44256
OH0100ZZ

U.S. COURTHOUSE & CUSTOM HOUSE
1716 SPIELBUSCH AVENUE
TOLEDO, OH 43624
OH0143ZZ

JOHN WELD PECK FEDERAL BUILDING
550 MAIN STREET
CINCINNATI, OH 45202
OH0189CN

FEDERAL BUILDING & U.S. COURTHOUSE
500 S. BARSTOW COMMONS
EAU CLAIRE, WI 54701
WI0016ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
517 E. WISCONSIN AVENUE
MILWAUKEE, WI 53202
WI0044ZZ

FEDERAL BUILDING
68 S. STEVENS
RHINELANDER, WI
WI0064ZZ

HEARTLAND REGION IA, KS, MO, NE

FEDERAL BUILDING & U.S. COURTHOUSE
101 1ST STREET, S.E.
CEDAR RAPIDS, IA 52401
IA0013ZZ

FEDERAL OFFICE BUILDING
& U.S. COURTHOUSE
131 E. 4TH STREET
DAVENPORT, IA 52801
IA0027ZZ

U.S. COURTHOUSE
123 E. WALNUT STREET
DES MOINES, IA 50309
IA0030ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
316-20 6TH STREET
SIOUX CITY, IA 51101
IA0087ZZ

U.S. COURTHOUSE
401 N. MARKET STREET
WICHITA, KS 67201
KS0070ZZ

U.S. COURTHOUSE & POST OFFICE
811 GRAND AVENUE
KANSAS CITY, MO 64106
MO0040ZZ

ROBERT A. YOUNG FEDERAL BUILDING
1222 SPRUCE STREET
ST. LOUIS, MO 63103
MO0106ZZ

FEDERAL BUILDING
203 W. 2ND STREET
GRAND ISLAND, NE 68801
NE0018ZZ

FEDERAL OFFICE BUILDING
106 S. 15TH STREET
OMAHA, NE 68102
NE0032ZZ

GREATER SOUTHWEST REGION
AR, LA, NM, OK, TX

ISAAC C. PARKER
FEDERAL BUILDING & U.S. COURTHOUSE
30 S. 6TH STREET
FT. SMITH, AR 72901
AR0021ZZ

RICHARD SHEPPARD ARNOLD
U.S. POST OFFICE & COURTHOUSE
600 W. CAPITOL STREET
LITTLE ROCK, AR 72201
AR0030ZZ

OLD U.S. POST OFFICE & COURTHOUSE
312 W. 2ND STREET
LITTLE ROCK, AR 72201
AR0031ZZ

U.S. POST OFFICE & COURTHOUSE
500 N. STATE LINE AVENUE
TEXARKANA, AR 75501
AR0057ZZ

U.S. POST OFFICE & COURTHOUSE
515 MURRAY STREET
ALEXANDRIA, LA 71301
LA0002ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
707 FLORIDA AVENUE
BATON ROUGE, LA 70801
LA0006BT

FEDERAL BUILDING & U.S. COURTHOUSE
201 JACKSON STREET
MONROE, LA 71201
LA0029ZZ

U.S. CUSTOM HOUSE
423 CANAL STREET
NEW ORLEANS, LA 70130
LA0033ZZ

F. EDWARD HEBERT FEDERAL BUILDING
600 S MAESTRI PLACE
NEW ORLEANS, LA 70190
LA0034ZZ

JOHN MINOR WISDOM
U.S. COURT OF APPEALS BUILDING
600 CAMP STREET
NEW ORLEANS, LA 70130
LA0035ZZ

U.S. BORDER PATROL BUILDING 13
3819 PATTERSON ROAD
NEW ORLEANS, LA 70144
LA0066NE

U. S. BORDER PATROL BUILDING 1
3819 PATTERSON ROAD
NEW ORLEANS, LA 70144
LA0811NE

U.S. BORDER PATROL BUILDING 2
3819 PATTERSON ROAD
NEW ORLEANS, LA 70144
LA0812NE

U.S. BORDER PATROL BUILDING 3
3819 PATTERSON ROAD
NEW ORLEANS, LA 70144
LA0813NE

U.S. BORDER PATROL BUILDING 4
3819 PATTERSON RD.
NEW ORLEANS, LA 70114
LA0814NE

U.S. BORDER PATROL SECTOR
HEADQUARTERS, BUILDING 14
3819 PATTERSON ROAD
NEW ORLEANS, LA 70114
LA0815NE

U.S. COURTHOUSE
FEDERAL PLACE & WASHINGTON AVENUE
SANTA FE, NM 87501
NM0015ZZ

FEDERAL BUILDING
123 4TH STREET, S.W.
ALBUQUERQUE, NM 87101
NM0501AQ

FEDERAL BUILDING & U.S. COURTHOUSE
421 GOLD AVENUE, S.W.
ALBUQUERQUE, NM 87103
NM0502AQ

CARL ALBERT
FEDERAL BUILDING & COURTHOUSE
301 E. CARL ALBERT PARKWAY
MCALISTER, OK 74501
OK0039ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
101 N. 5TH STREET
MUSKOGEE, OK 74401
OK0041ZZ

U.S. POST OFFICE & COURTHOUSE
215 DEAN A. MCGEE AVENUE
OKLAHOMA CITY, OK 73102
OK0046CT

FEDERAL BUILDING
224 S. BOULDER AVENUE
TULSA, OK 74103
OK0063ZZ PARTIAL BPP

FEDERAL BUILDING & U.S. COURTHOUSE
410 S.W. 5TH STREET
LAWTON, OK 73501
OK0074ZZ

J. MARVIN JONES FEDERAL BUILDING
205 E. 5TH STREET
AMARILLO, TX 79101
TX0006ZZ

U.S. COURT HOUSE
200 W. 8TH STREET
AUSTIN, TX 78701
TX0012ZZ

JACK BROOKS FEDERAL BUILDING,
WILLOW & BROADWAY STREETS
BEAUMONT, TX 77701
TX0019ZZ

FEDERAL BUILDING (TERMINAL)
207 S. HOUSTON
DALLAS, TX 75202
TX0057ZZ

FEDERAL BUILDING (SANTA FE BUILDING)
114 COMMERCE STREET
DALLAS, TX 75242
TX0058DA

U.S. COURTHOUSE
511 E. SAN ANTONIO AVENUE
EL PASO, TX 79901
TX0069ZZ

U.S. COURTHOUSE
501 W. 10TH STREET
FORT WORTH, TX 76102
TX0075ZZ

U.S. CUSTOM HOUSE
20TH & POST OFFICE
GALVESTON, TX 77550
TX0080ZZ

U.S. POST OFFICE & COURTHOUSE
601 ROSENBERG STREET
GALVESTON, TX 77550
TX0081ZZ

U.S. CUSTOM HOUSE
701 SAN JACINTO STREET
HOUSTON, TX 77002
TX0101ZZ

U.S. BORDER STATION
CONVENT & ZARAGOZA
LAREDO, TX 78040
TX0116CV PARTIAL BPP

U.S. POST OFFICE & COURTHOUSE
1300 MATAMOROS
LAREDO, TX 78040
TX0117ZZ

WARD R. BURKE U.S. COURTHOUSE
104 N. 3RD STREET
LUFKIN, TX 75901
TX0126ZZ

SAM B. HALL, JR.
FEDERAL BUILDING & U.S. COURTHOUSE
100 E. HOUSTON STREET
MARSHALL, TX 75670
TX0130ZZ

O.C. FISHER
FEDERAL BUILDING & U.S. COURTHOUSE
33 E. TWOHIG
SAN ANGELO, TX 76901
TX0163ZZ

HIPOLITO F. GARCIA FEDERAL BUILDING
& U.S. COURTHOUSE
615 E. HOUSTON STREET
SAN ANTONIO, TX 78205
TX0164ZZ

FEDERAL BUILDING,
U.S. POST OFFICE & COURTHOUSE
221 W. FERGUSON STREET
TYLER, TX 75701
TX0182TY

FEDERAL BUILDING & U.S. COURTHOUSE
101 E. PECAN STREET
SHERMAN, TX 75090
TX0210ZZ

J.J. PICKLE FEDERAL BUILDING
300 E. 8TH STREET
AUSTIN, TX 78701
TX0227AU

FEDERAL CENTER BUILDING 6
651 S. MAIN AVENUE
SAN ANTONIO, TX 78204
TX0655SA

FEDERAL CENTER BUILDING 12
651 S. MAIN AVENUE
SAN ANTONIO, TX 78204
TX0657SA

ROCKY MOUNTAIN REGION
CO, MT, ND, SD, UT, WY

U.S. CUSTOM HOUSE
721 19TH STREET
DENVER, CO 80202
CO0006ZZ

BYRON R. WHITE U.S. COURTHOUSE
1823 STOUT STREET
DENVER, CO 80202
CO0009ZZ

WAYNE ASPINALL
FEDERAL BUILDING & U.S. COURTHOUSE
400 ROOD AVENUE
GRAND JUNCTION, CO 81501
CO0018ZZ

FEDERAL EMERGENCY MANAGEMENT AGENCY
BUILDING 710
W. 6TH AVENUE & KIPLING STREET
LAKEWOOD, CO 80225
CO0631AA

OCD, EMERGENCY OPERATIONS CENTER
W. 6TH AVENUE & KIPLING STREET
LAKEWOOD, CO 80225
CO0656AA

FEDERAL BUILDING & U.S. COURTHOUSE
400 N. MAIN STREET
BUTTE, MT 59701
MT0004ZZ

FEDERAL BUILDING,
U.S. POST OFFICE & COURTHOUSE
200 E. BROADWAY STREET
MISSOULA, MT 59801
MT0017ZZ

JAMES F. BATTIN FEDERAL BUILDING
AND COURTHOUSE
316 N. 26TH STREET
BILLINGS, MT 59101
MT0028ZZ

CHIEF MOUNTAIN BORDER STATION
ADMINISTRATION BUILDING
STATE HIGHWAY 17
BABB, MT 59411
MT0501AD

CHIEF MOUNTAIN U.S. BORDER STATION
STATE HIGHWAY 17
BABB, MT 59411
MT0502AD

CHIEF MOUNTAIN U.S. BORDER STATION
STATE HIGHWAY 17
BABB, MT 59411
MT0503AD

PIEGAN BORDER STATION
RESIDENTIAL APARTMENTS
U.S. HIGHWAY 89
BABB, MT 59411
MT0551AE

FEDERAL BUILDING
304 E. BROADWAY
BISMARCK, ND 58501
ND0002ZZ

FEDERAL BUILDING & U.S. COURTHOUSE
655 1ST AVENUE, N.
FARGO, ND 58102
ND0006ZZ

RONALD N. DAVIES
FEDERAL BUILDING & U.S. COURTHOUSE
102 N. 4TH STREET
GRAND FORKS, ND 58201
ND0008ZZ

BRUCE M. VAN SICKLE
FEDERAL BUILDING & U.S. COURTHOUSE
100 1ST STREET, S.W.
MINOT, ND 58701
ND0014ZZ

U.S. CUSTOM HOUSE & POST OFFICE
125 S. CAVALIER STREET
PEMBINA, ND 58271
ND0018ZZ

U.S. BORDER STATION
STATE HIGHWAY 42
AMBROSE, ND 58833
ND0501AK

U.S. BORDER STATION
U.S. HIGHWAY 52
PORTAL, ND 58772
ND0521AM

U.S. BORDER STATION
STATE HIGHWAY 30
ST. JOHN, ND 58369
ND0531AN

FEDERAL BUILDING & U.S. COURTHOUSE
400 S. PHILLIPS STREET
SIOUX FALLS, SD 57102
SD0021ZZ

U.S. FOREST SERVICE BUILDING
507 25TH STREET
OGDEN, UT 84401
UT0010ZZ

J. WILL ROBINSON FEDERAL BUILDING
88 W. 100TH, N.
PROVO, UT
UT0014ZZ

FRANK E. MOSS U.S. COURTHOUSE
350 S. MAIN STREET
SALT LAKE CITY, UT 84101
UT0017ZZ

BUILDING 2
CLEARFIELD FEDERAL DEPOT
CLEARFIELD, UT 84016
UT0501AT

BUILDING C-6
CLEARFIELD FEDERAL DEPOT
CLEARFIELD, UT 84016
UT0511AT

BUILDING C-7
CLEARFIELD FEDERAL DEPOT
CLEARFIELD, UT 84016
UT0512AT

BUILDING D-5
CLEARFIELD FEDERAL DEPOT
CLEARFIELD, UT 84016
UT0531AT

EWING T. KERR
FEDERAL BUILDING & U.S. COURTHOUSE
111 WOLCOTT STREET
CASPER, WY 82601
WY0003ZZ

FEDERAL OFFICE BUILDING
308 W. 21ST STREET
CHEYENNE, WY 82001
WY0004ZZ

PACIFIC RIM REGION
AZ, CA, HI, NV

JAMES A. WALSH U.S. COURTHOUSE
55 E. BROADWAY STREET
TUCSON, AZ 85701
AZ0015ZZ

U.S. CUSTOM HOUSE
INTERNATIONAL STREET & GRAND AVENUE
NOGALES, AZ 85621
AZ0551BB

U.S. BORDER STATION GARITA 2
INTERNATIONAL STREET & MORLEY AVENUE
NOGALES, AZ 85621
AZ0553BB

U.S. BORDER STATION
INTERNATIONAL BOUNDARY
SASABE, AZ 85633
AZ0601CC

U.S. BORDER STATION GARAGE
INTERNATIONAL BOUNDARY
SASABE, AZ 85633
AZ0602CC

U.S. BORDER STATION
PAN AMERICAN AVENUE
DOUGLAS, AZ 85607
AZ0611DD

U.S. BORDER STATION GARAGE
PAN AMERICAN AVENUE
DOUGLAS, AZ 85607
AZ0612DD

U.S. BORDER STATION
106 D STREET
NACO, AZ 85620
AZ0681HH

U.S. COURTHOUSE
312 N. SPRING STREET
LOS ANGELES, CA 90012
CA0041ZZ

FEDERAL BUILDING
801 I STREET
SACRAMENTO, CA 95818
CA0083ZZ

JACOB WEINBERGER U.S. COURTHOUSE
325 W. F STREET
SAN DIEGO, CA 92101
CA0088ZZ

U.S. IMMIGRATION STATION
& APPRAISERS STORE
630 SANSOME STREET
SAN FRANCISCO, CA 94111
CA0091AA

U.S. CUSTOM HOUSE
555 BATTERY STREET
SAN FRANCISCO, CA 94111
CA0092AA

FEDERAL BUILDING
50 UNITED NATIONS PLAZA
SAN FRANCISCO, CA 94102
CA0093ZZ

JAMES R. BROWING U.S. COURT
OF APPEALS BUILDING
99 7TH STREET
SAN FRANCISCO, CA 94107
CA0096ZZ

HAWTHORNE FEDERAL BUILDING
15000 AVIATION BLVD
HAWTHORNE, CA 90520
CA0224ZZ

U.S. BORDER STATION
OLD CUSTOMS BUILDING
12 HEFFERNAN AVENUE
CALEXICO, CA 92231
CA0501BB

U.S. BORDER STATION
801 E. SAN YSIDRO BOULEVARD
SAN DIEGO, CA 92115
CA0581GG

U.S. BORDER STATION
STATE HIGHWAY 188
TECATE, CA 92080
CA0801LL

IMMIGRATION INSPECTOR'S RESIDENCE
STATE HIGHWAY 188
TECATE, CA 92080
CA0802LL

CUSTOM INSPECTOR'S RESIDENCE
STATE HIGHWAY 188
TECATE, CA 92080
CA0803LL

RICHARD H. CHAMBERS
U.S. COURT OF APPEALS BUILDING
125 S. GRAND AVENUE
PASADENA, CA 91105
CA9551RR

FEDERAL BUILDING,
U.S. POST OFFICE & COURTHOUSE
154 WAIANUENUE AVENUE
HILO, HI 96720
HI0001ZZ

NORTHWEST/ARCTIC REGION

AK, ID, OR, WA

FEDERAL BUILDING
601 W. 4TH STREET
ANCHORAGE, AK 99501
AK0001ZZ

FEDERAL BUILDING
648 MISSION STREET
KETCHIKAN, AK 99901
AK0005AK

FEDERAL BUILDING
205 N. 4TH STREET
COEUR D'ALENE, ID 83814
ID0008ZZ

U.S. BORDER STATION
PORTHILL, ID 83853
ID0551PB

JAMES A. REDDEN U.S. COURTHOUSE
310 W. 6TH STREET
MEDFORD, OR 97501
OR0018ZZ

GUS J. SOLOMON U.S. COURTHOUSE
620 S.W. MAIN STREET
PORTLAND, OR 97204
OR0023ZZ

PIONEER U.S. COURTHOUSE
520 S.W. MORRISON
PORTLAND, OR 97204
OR0024ZZ

U.S. CUSTOM HOUSE
220 N.W. 8TH AVENUE
PORTLAND, OR 97209
OR0025ZZ

FEDERAL BUILDING
138 W. 1ST STREET
PORT ANGELES, WA 98362
WA0028ZZ

WILLIAM KENZO NAKAMURA U.S.
COURTHOUSE
1010 5TH AVENUE
SEATTLE, WA 98104
WA0035ZZ

FEDERAL BUILDING
909 1ST AVENUE
SEATTLE, WA 98174
WA0036ZZ

FEDERAL BUILDING & U.S. POST OFFICE
W. 904 RIVERSIDE
SPOKANE, WA 99201
WA0045ZZ

WILLIAM O. DOUGLAS FEDERAL BUILDING
25 S. 3RD STREET
YAKIMA, WA 98901
WA0053ZZ

U.S. BORDER STATION
CURLW, WA 98859
WA0551FB

U.S. BORDER STATION GARAGE
U.S. BORDER STATION
CURLW, WA 98859
WA0552FB

U.S. BORDER STATION STORAGE
U.S. BORDER STATION
CURLW, WA 98859
WA0553FB

U.S. BORDER STATION
LAURIER, WA 99146
WA0601LB

U.S. BORDER STATION RESIDENCE 1
LAURIER, WA 99146
WA0602LB

U.S. BORDER STATION RESIDENCE 2
LAURIER, WA 99146
WA0603LB

U.S. BORDER STATION
METALINE FALLS, WA 99153
WA0611MB

U.S. BORDER STATION RESIDENCE 1
METALINE FALLS, WA 99153
WA0612MB

U.S. BORDER STATION RESIDENCE 2
METALINE FALLS, WA 99153
WA0613MB

FEDERAL CENTER SOUTH OFFICE
4735 E. MARGINAL WAY
SEATTLE, WA 98134
WA0953KC

FEDERAL CENTER SOUTH
BUREAU OF INDIAN AFFAIRS OFFICE
4735 E. MARGINAL WAY
SEATTLE, WA 98134
WA0956KC

NATIONAL CAPITAL REGION
DC (METRO AREA)

NEBRASKA AVENUE COMPLEX –
20 BUILDINGS
WASHINGTON, DC 20016
DC0000NA

ST. ELIZABETHS HOSPITAL –
64 BUILDINGS
2700 MARTIN LUTHER KING JR. AVENUE
WASHINGTON, DC 20036
DC0000SE

CENTRAL HEATING PLANT
325 13TH STREET, S.W.
WASHINGTON, DC 20405
DC0001ZZ

WEST HEATING PLANT
1051 29TH STREET, N.W.
WASHINGTON, DC 20007
DC0002ZZ PARTIAL BPP

JAMES L. WHITTEN FEDERAL BUILDING
U.S. DEPARTMENT OF AGRICULTURE
12TH STREET & JEFFERSON DRIVE, S.W.
WASHINGTON, DC 20250
DC0003ZZ

AGRICULTURE (COTTON) ANNEX
12TH & C STREETS, S.W.
WASHINGTON, DC 20024
DC0004ZZ

AGRICULTURE SOUTH BUILDING
14TH STREET & INDEPENDENCE AVE., S.W.
WASHINGTON, DC 20003
DC0005ZZ

VETERANS ADMINISTRATION BUILDING
810 VERMONT AVENUE, N.W.
WASHINGTON, DC 20420
DC0007ZZ

HERBERT C. HOOVER BUILDING
U.S. DEPARTMENT OF COMMERCE
14TH STREET & CONSTITUTION AVENUE,
N.W.
WASHINGTON, DC 20036
DC0013ZZ

E. BARRETT PRETTYMAN U.S. COURTHOUSE
CONSTITUTION AVENUE
& JOHN MARSHALL PLACE, N.W.
WASHINGTON, DC 20001
DC0014ZZ

U.S. COURT OF MILITARY APPEALS
450 E STREET, N.W.
WASHINGTON, DC 20001
DC0016ZZ

WHITE HOUSE - WEST WING
1600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20005
DC0017ZZ

FEDERAL TRADE COMMISSION
6TH STREET & PENNSYLVANIA AVENUE,
N.W.
WASHINGTON, DC 20001
DC0019ZZ

U.S. DEPARTMENT OF THE INTERIOR
BUILDING
1849 C STREET, N.W.
WASHINGTON, DC 20240
DC0020ZZ

U.S. GENERAL SERVICES
ADMINISTRATION BUILDING
1800 F STREET, N.W.
WASHINGTON, DC 20405
DC0021ZZ

INTERNAL REVENUE SERVICE BUILDING
1111 CONSTITUTION AVENUE, N.W.
WASHINGTON, DC 20225
DC0022ZZ

ROBERT F. KENNEDY BUILDING
U.S. DEPARTMENT OF JUSTICE
9TH STREET & CONSTITUTION AVENUE,
N.W.
WASHINGTON, DC 20530
DC0023ZZ

LAFAYETTE BUILDING
811 VERMONT AVENUE, N.W.
WASHINGTON, DC 20009
DC0026ZZ

ARIEL RIOS FEDERAL BUILDING
12TH STREET & PENNSYLVANIA AVE., N.W.
WASHINGTON, DC 20004
DC0028ZZ

NANCY HANKS CENTER/
OLD POST OFFICE BUILDING
1100 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, DC 20001
DC0029ZZ

U.S. PENSION BUILDING/
NATIONAL BUILDING MUSEUM
401 F STREET, N.W.
WASHINGTON, DC 20001
DC0030ZZ

U.S. DEPARTMENT OF THE INTERIOR SOUTH
1951 CONSTITUTION AVENUE, N.W.
WASHINGTON, DC 20009
DC0032ZZ

MARY E. SWITZER BUILDING
330 C STREET, S.W.
WASHINGTON, DC 20230
DC0033ZZ

WILBUR J. COHEN BUILDING
330 INDEPENDENCE AVENUE, S.W.
WASHINGTON, DC 20201
DC0034ZZ PARTIAL

DWIGHT D. EISENHOWER
EXECUTIVE OFFICE BUILDING
17TH STREET & PENNSYLVANIA AVE., N.W.
WASHINGTON, DC 20506
DC0035ZZ

GENERAL POST OFFICE (TARIFF)
701 E STREET, N.W.
WASHINGTON, DC 20436
DC0036ZZ

PRESIDENT'S GUEST HOUSE/BLAIR HOUSE
1651-1653 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, DC 20006
DC0042ZZ

HARRY S. TRUMAN BUILDING
U.S. DEPARTMENT OF STATE
2201 C STREET, N.W.
WASHINGTON, DC 20520
DC0046ZZ

WINDER BUILDING
600 17TH STREET, N.W.
WASHINGTON, DC 20006
DC0048ZZ

FEDERAL BUILDING
(HOME OWNERS' LOAN CORPORATION)
320 1ST STREET, N.W.
WASHINGTON, DC 20001
DC0075ZZ

CIVIL SERVICE BUILDING
1724 F STREET, N.W.
WASHINGTON, DC 20006
DC0078ZZ

J. EDGAR HOOVER F.B.I BUILDING
935 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC
DC0090ZZ

ROBERT C. WEAVER FEDERAL BUILDING
U.S. DEPARTMENT OF HOUSING
& URBAN DEVELOPMENT
451 7TH STREET, S.W.
WASHINGTON, DC
DC0092ZZ

DOLLY MADISON HOUSE
721 MADISON PLACE, N.W.
WASHINGTON, DC 20005
DC0111AA

BEN O. TAYLOR HOUSE
723 MADISON PLACE, N.W.
WASHINGTON, DC 20005
DC0112AA

COSMOS CLUB
725 MADISON PLACE, N.W.
WASHINGTON, DC 20005
DC0113AA

U.S. TAX COURT BUILDING
400 2ND STREET, N.W.
WASHINGTON, DC
DC0114ZZ

HUBERT H. HUMPHREY FEDERAL BUILDING
U.S. DEPARTMENT OF HEALTH
& HUMAN SERVICES
200 INDEPENDENCE AVENUE, S.W.
WASHINGTON, DC
DC0115ZZ

TROWBRIDGE HOUSE
708 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0117AA

RATHBONE HOUSE
712 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0118AA

MARY JESSUP BLAIR HOUSE
716 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0119AA

JACKSON PLACE COMPLEX
718 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0120AA

JACKSON PLACE COMPLEX
722 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0121AA

JACKSON PLACE COMPLEX
726 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0122AA

LAWRENCE G. O'TOOLE HOUSE
730 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0123AA

CHARLES CARROLL GLOVER HOUSE
734 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0124AA

CORNELIA KNOWER MARCY HOUSE
736 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0125AA

JACKSON PLACE COMPLEX
740 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0126AA

JACKSON PLACE COMPLEX
744 JACKSON PLACE, N.W.
WASHINGTON, DC 20006
DC0127AA

SIDNEY YATES (AUDITORS MAIN) BUILDING
14TH STREET & INDEPENDENCE AVENUE,
S.W.
WASHINGTON, DC 20024
DC0501BC

AUDITORS WEST BUILDING (ANNEX 3)
15TH STREET & INDEPENDENCE AVENUE,
S.W.
WASHINGTON, DC 20003
DC0504BC

U.S. SECRET SERVICE HEADQUARTERS
(MERCANTILE BANK BUILDING)
950 H STREET, NW
WASHINGTON, DC 20001
DC0505ZZ

ENVIRONMENTAL PROTECTION AGENCY,
WEST BUILDING
12TH STREET & CONSTITUTION AVENUE,
N.W.
WASHINGTON, DC 20423
DC0521AB

ENVIRONMENTAL PROTECTION AGENCY,
EAST BUILDING
14TH STREET & CONSTITUTION AVENUE,
N.W.
WASHINGTON, DC 20001
DC0522AB

ANDREW W. MELLON AUDITORIUM
14TH STREET & CONSTITUTION AVENUE,
N.W.
WASHINGTON, DC 20001
DC0523AB

CENTRAL BUILDING
2430 E STREET, N.W.
WASHINGTON, DC 20037
DC0531AC

EAST BUILDING
2430 E STREET, N.W.
WASHINGTON, DC 20037
DC0532AC

SOUTH BUILDING
2430 E STREET, N.W.
WASHINGTON, DC 20037
DC0533AC

NAVY YARD 74
4TH & M STREETS, S.E.
WASHINGTON, DC 20370
DC0631AE

NAVY YARD 160
4TH & M STREETS, S.E.
WASHINGTON, DC 20370
DC0641AE

NYA BUILDING 202
4TH & M STREETS, S.E.
WASHINGTON, DC 20370
DC0648AE PARTIAL BPP

WEBSTER SCHOOL
940 H STREET, N.W.
WASHINGTON, DC 20223
DC0720ZZ

FEDERAL BUILDING
& U.S. POST OFFICE
2 W. MONTGOMERY AVENUE
ROCKVILLE, MD 20800
MD0032ZZ

FEDERAL OFFICE BUILDING 3 (FOB 3)
4700 SILVER HILL ROAD
SUITLAND, MD 20746
MD0035AG

SUITLAND HOUSE
4510 SILVER HILL ROAD
SUITLAND, MD 20028
MD0070AG

DOE MAIN BLDG
19901 GERMANTOWN ROAD
GERMANTOWN, MD 20874
MD0531AJ

DOE AUDITORIUM
ROUTE 118
GERMANTOWN, MD 20874
MD0533AJ

RADIO BUILDING
ROUTE 118
GERMANTOWN, MD 20874
MD0534AJ

EQUIPMENT SHED
ROUTE 118
GERMANTOWN, MD 20874
MD0538AJ

BOILER PLANT AND GARAGE
ROUTE 118
GERMANTOWN, MD 20874
MD0540AJ

MARTIN BOSTETTER
U.S. POST OFFICE & COURTHOUSE
200 S. WASHINGTON STREET
ALEXANDRIA, VA 22309
VA0003ZZ

ADM 1020.02 PROCEDURES FOR HISTORIC PROPERTIES

ADM 1020.02 is the principal GSA policy implementing the National Historic Preservation Act of 1966 (NHPA), as amended, and related laws, orders, and regulations. Major revisions issued in October 2003 brought GSA preservation policy, first established by the ADM in 1982, in accordance with current laws, regulations, and professional standards.

The new ADM institutionalizes best practices that have proven successful for GSA, with step-by-step compliance procedures, guidance, and resources addressing the range of GSA activities affecting historic buildings and other cultural property, including archeological and underwater artifacts as well as buildings. It establishes professional qualification standards for GSA associates involved in compliance activities and details the roles and responsibilities of PBS leadership, preservation officers, and regional programs, to ensure access by GSA associates to needed information and professional support, to eliminate redundant effort, and to minimize litigation risk. In compliance with NHPA Section 110 and Executive Order 13287, building-specific and inventory-wide preservation planning requirements are also detailed, including planning and consultation associated with long-term leases of historic property.

GSA ORDER

Subject: Procedures for historic properties

1. **Purpose.** This Order transmits procedures for complying with Federal regulations for the use, protection and enhancement of historic and cultural properties.
2. **Cancellation.** ADM 1020.1, dated August 20, 1982, and PBS P 1022.1, dated March 2, 1981, are canceled.
3. **Background.** The National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470 et seq.), Executive Order 11593, Executive Order 13006, and Executive Order 13287 direct all Federal agencies to:
 - a. Administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations;
 - b. Initiate measures necessary to direct their policies, plans and programs in such a way that Federally-owned sites, structures and objects of historical, architectural or archeological significance are preserved, restored and maintained for the inspiration and benefit of the people;
 - c. Institute Federal plans and programs that contribute to the preservation and enhancement of non-Federally-owned sites, structures and objects of historical, architectural or archeological significance;
 - d. Initiate procedures to promote the viability and use of historic properties available to the agency, promote location of Federal agencies in historic buildings and historic districts in central business areas and overcome barriers to the use of historic properties;
 - e. Locate, inventory and nominate to the Secretary of the Interior all sites, buildings, districts, and objects under their jurisdiction or control that appear to qualify for listing on the National Register of Historic Places;
 - f. Exercise caution during the interim period until inventories and evaluations required by section 3.e, above, are completed so that any Federally-owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered without the benefit of appropriate consideration and procedures for external review and public participation provided under Federal law. Any questionable actions shall be referred to the Secretary of the Interior for an opinion regarding the property's eligibility for inclusion in the National Register of Historic Places;
 - g. Initiate measures and procedures to provide for the continued utility and appropriate care of Federally-owned historic properties and non-Federally-owned historic properties that GSA has an opportunity to lease or acquire, in accordance with the professional standards prescribed by the Secretary of the Interior; and
 - h. Establish procedures to monitor and report on the condition and use of historic properties under GSA control and to report annually on archeological activity associated with GSA construction projects.
4. **Applicability.** This Order applies to all GSA programs, activities and actions that could affect historic and cultural properties. This Order is for guidance of regional historic preservation officers and all other GSA personnel engaged in activities affecting historic properties.
5. **Implementation.** The GSA Federal Preservation Officer is responsible for coordinating with the Heads of Public Buildings Service Staff and Regional Offices to develop plans and procedures for implementing this Order, including measurements and assessment methods for monitoring GSA's progress in meeting its stewardship goals within the framework of GSA business goals and practices. The Head of each Service, Staff and Regional Office shall establish responsibilities within their respective Service, Staff and Regional office consistent with those established by this Order.

Stephen A. Perry
Administrator

PROCEDURES FOR HISTORIC PROPERTIES

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APPENDIX A. NATIONAL HISTORIC PRESERVATION ACT OF 1966, AS AMENDED

APPENDIX B. 36 C.F.R. PART 800

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APPENDIX D. EXECUTIVE ORDER 11593

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APPENDIX F. EXECUTIVE ORDER 13287

APPENDIX G. RHPO POSITION DESCRIPTION

PROJECT DOCUMENTATION TEMPLATE FOR SECTION 106 COMPLIANCE

PRESERVATION REPORT FORMAT

8 1/2 inches by 11 inches narrative report, with captioned photographs showing existing conditions, keyed to a location plan(s) showing photo orientation, and drawings of each preservation design solutions, reduced to 8 1/2 inches by 11 inches and bound into report, or, if not legible at 8 1/2 inches by 11 inches, 11 inches by 17 inches foldout or placed in cover pocket.

COVER

Building name, Address, Project title, Project Control Number, Author (Preservation Architect), Preservation Architect's Signature, and Date of Submission.

EXECUTIVE SUMMARY

A. Scope and purpose of project.

B. Individuals and groups involved: A/E firm, Preservation Consultant, GSA Project Officer, Building Manager, GSA Regional Preservation Officer or Preservation Program staff reviewer.

SITE CONDITIONS

A. Building and project location.

B. Building size, configuration, materials, conditions.

Include captioned photographs showing existing site and building conditions at each affected area.

PRESERVATION DESIGN ISSUES

Explain solutions explored, how resolved and why, such as (not inclusive):

A. Locating new work/installation: visibility, protection of ornamental finishes, cost concerns

B. Design of new work/installation: address compatibility with existing original materials, research on original design (if original materials non-extant), materials/finishes chosen

C. Method of supporting new work/installation

D. Preservation and protection of historic materials

Include reduced project drawings of site plan, elevations, sections, and details.

For work on historic building, include restoration specifications for work requiring restoration specialists; competency of bidder requirements (Sections 00120 and 009[00]).

EFFECTS

Summarize and effects the project will have on the building's architecturally significant qualities. If there are unavoidable adverse affects, explain measures proposed to mitigate the negative impact of changes.

INTEGRATION OF A FEDERAL LEGACY VISION WITH GSA'S PORTFOLIO STRATEGY FOR RESTRUCTURING AND REINVESTING IN THE OWNED-INVENTORY

Issued August 2002

RESTRUCTURING THE OWNED INVENTORY

Faced with insufficient capital to maintain its existing inventory, GSA is undertaking a comprehensive review of its public buildings to best align the portfolio with its mission. Known as *The Portfolio Strategy for Restructuring and Reinvesting in the Owned Inventory*, this initiative will restructure the owned portfolio to consist primarily of strong income-producing properties generating sufficient funds to meet their own capital reinvestment needs. The ultimate outcome is to provide quality workplaces, increase customer satisfaction, and enhance the asset value of our real estate portfolio for the benefit of the taxpayer.

STEWARDSHIP TO PRESERVE HISTORIC BUILDINGS

Along with fiduciary responsibilities driving the portfolio restructuring initiative, GSA has a significant stewardship responsibility to preserve historic buildings and legal obligations under the National Historic Preservation Act (NHPA) and Executive Order 13006. Both the law and Executive Order call on the federal government to choose historic buildings first and to make every effort to put historic buildings to government use and to keep them viable.

Under NHPA, "historic buildings" are those buildings that meet the criteria for listing in the National Register of Historic Places. Age (50 years or older), along with architectural and historic significance, is the primary criterion. NHPA gives equal consideration to properties that have already been included in the National Register as well as those that have not been included, but meet the National Register criteria.

GSA-OWNED PORTFOLIO FACTS

- Over 1700 buildings.
- Over \$6 billion in repair and alteration needs. (IRIS)
- 5-year average annual capital reinvestment budget of \$570 million.
- 570 buildings are non-performing.
- 123 buildings are under-performing.
- About 800 buildings are over 50-years old.
- 436 buildings meet basic National Register eligibility criteria.
- 223 buildings are listed on the National Register.
- 33 buildings are National Historic Landmarks, 11 are individually listed.
- About 250 buildings are considered monumental or legacy buildings.

A FEDERAL LEGACY VISION

Although 436 buildings are subject to special consideration under NHPA, not all buildings warrant the same amount of investment and stewardship effort. Priority should be given to the most significant buildings. Of the 436 historic buildings in our inventory, about 250 are considered monumental or legacy buildings designed to serve a symbolic and ceremonial, as well as functional, purpose for the government.

**INTEGRATION OF A FEDERAL
LEGACY VISION WITH RESTRUCTURING
THE OWNED PORTFOLIO**

Both GSA's portfolio restructuring initiative and its stewardship responsibilities must be performed in an integrated fashion. Given the constraints on capital, it is clear that strategic use of limited funds requires GSA to make choices that will benefit some properties more than others.

The Restructuring Initiative involves reviewing and categorizing buildings as performing, under-performing, and non-performing using quantitative measurement methods. Qualitative criteria or less tangible values (like historic or architectural significance) are not considered at this point. Non-performing and under-performing buildings are placed on a watchlist. Each watchlisted-building will then be examined and a workout strategy selected.

At the point in time when a strategy is developed for a non- or under-performing building, intangible values, such as stewardship and legacy principles come into clear focus and influence decision-making. *Strategies must be explored to ensure that GSA's historic buildings are positioned to be the strongest financial performers possible.*

Asset-specific strategies, addressing the asset's financial condition, market conditions, customer needs, and hold period, have been drafted and captured in Asset Business Plans. Asset Business Teams should partner with Historic Preservation Offices to refine these strategies, pursue reuse, and ensure that GSA's historic buildings are given the priority required under NHPA. Asset Business Plans and asset-specific strategies should be developed in context of Local Portfolio Plans. Specific considerations include:

■ **Maintenance and Repair.** Asset Business Teams should monitor cleaning, maintenance, and utility costs at GSA-

owned historic buildings to ensure optimum operating efficiency. Minor repairs should be completed in a timely way to minimize deterioration and the need for more costly future investments.

■ **ROI Pricing.** Asset Business Teams should reassess the pricing structure to determine if Return on Investment (ROI) pricing will change the financial performance of the building. This must be done collaboratively with the customer and using the Office of Management and Budget-approved methodology. ROI pricing can be considered for modernization projects as well.

■ **Marketing to Agencies.** Giving first preference to GSA-owned historic buildings, Asset Business Teams should determine whether any vacancy can be recovered via marketing to other federal agencies. Housing solutions that favor historic buildings need to be sold to customers.

■ **Supplementing Predominantly Federal Use With Out-leasing.** Historic buildings with a continuing need to house federal tenants, can be supplemented with outleases to improve financial standing. Outleasing is not appropriate for all buildings, such as buildings where a federal presence is no longer needed in the community. However, it can be a valuable tool to improve financial viability, provided that the outlease terms are fixed and compatible tenants are found. Outleasing can also be used as a short-term holding tool.

■ **Conveyance to Financially Positioned Stewards.** While the goal is to restructure the owned-portfolio to consist primarily of strong income-producing properties, GSA acknowledges that it will inevitably need to retain a limited number of buildings at the financial fringe. It is envisioned that this limited number will consist primarily of legacy properties. That said, GSA's financial constraints need not impair its stewardship responsibilities. Donation or conveyance to a responsible steward who is better positioned than GSA to devote additional resources to preserve the building can be sought.

HISTORIC BUILDING REINVESTMENT NEEDS

CENTER FOR HISTORIC BUILDINGS

OFFICE OF REAL PROPERTY ASSET MANAGEMENT

August 2008

Problem: current appropriation levels are insufficient for reinvestment required to sustain GSA's core inventory of Legacy buildings

Solution/Request: additional funding and flexibility is needed to keep the nation's most important federal public buildings occupied and viable

Background: legal basis for putting historic buildings first

- *National Historic Preservation Act (NHPA):* calls on the federal government to use available historic buildings to the greatest extent possible and to restore, maintain, and plan for their appropriate long term care
- *Executive Order 13006, Locating Federal Facilities on Historic Properties in Our Nation's Central Cities:* agencies must give first consideration to locating in historic buildings and districts in city centers
- *Executive Order 13287 Preserve America:* calls on agencies to protect, enhance, and use federally owned historic properties; maintain accurate information on their condition; overcome administrative obstacles to using and maintaining historic buildings; and promote the public benefits of federally owned historic properties, including heritage tourism

Magnitude and importance of GSA's historic building inventory

- 470 buildings—over one-fourth of GSA's owned inventory
- 254 buildings listed on the National Register of Historic Places
- Includes 12 individually listed National Historic Landmarks (NHLs), and 95 buildings within NHL Historic Districts or National Historic Sites

Legacy buildings

- Half (226) of GSA's historic buildings are Legacy buildings: monumental, iconic public buildings such as courthouses, custom houses, agency headquarters
- Most are prominent community landmarks

- Consistently show higher customer satisfaction than nonhistoric buildings
- Highest quality federal construction—durable natural materials, detailing, and ornament
- Earn \$737 million annually in federal agency rent (\$388 million Funds From Operations)
- Most are or will become financially strong performers with reinvestment

Magnitude of Legacy building reinvestment needs

- Legacy Buildings: \$3.6 billion repairs and alterations (R&A) backlog
- Need building systems replacement, safety and security compliance and energy upgrades to meet current standards

Reinvestment trends and repercussions for the monumental inventory

- R&A funding flat 10 years with declining purchasing power
- Basic R&A remains close to 1999 levels, buying one third less than it did in 2002
- Dramatically increased construction costs equal twice CPI growth rate since 2001
- 2008 budget will only fund 67 percent of the reinvestment that 2002 budget covered
- Funds are stretched further by aging lower quality mid-century buildings competing for reinvestment

Benefits of reinvestment

- Long life cycle monumental building construction: building envelopes and ceremonial spaces require infrequent repair and maintenance, typically on a 70-year cycle
- Operating costs annually average \$4.08 per square foot, 16 percent lower than the average cost for GSA buildings less than 50 years old
- Ceremonial interior spaces offer high-quality materials and craftsmanship not affordable today
- Reinforces customer commitment to federally owned inventory
- Positive federal presence serves GSA client agencies

- Fosters appreciation for the government's role in citizens' daily lives
- Boosts community image and supports economic vitality of older city centers
- Continued use of urban infrastructure and materials supports federal sustainability goals

Examples: Legacy buildings and needed reinvestment

Herbert C. Hoover Building (Department of Commerce), Washington, D.C.

- Largest office building in the world on completion in 1932
- Great Hall (historic Patent Library) serves as a White House Visitor Center
- Contains grandest historic lobby in the Federal Triangle, National Aquarium, law library, auditorium, executive suite, and six courtyards
- 1.6 million Rentable Square Feet
- Earns \$29 million rent annually (\$25 million Funds From Operations)
- Reinvestment need \$287 million
- Needs new systems; security, code and workspace upgrades

U.S. Custom House, Philadelphia, Pennsylvania

- Rotunda is GSA's finest Art Deco interior, embellished with George Harding murals featuring commerce and nautical vignettes; serpentine walls decorated with shells, seahorses and Neptunes; and ornamental aluminum railings and serpentine borders
- Sculpted 14-story tower and lantern is an iconic feature in Philadelphia skyline
- Contributing structure in Independence National Park Historic District
- 500,000 Rentable Square Feet
- Earns \$9 million rent annually (\$4.6 million Funds from Operations)
- Reinvestment need \$27 million
- Needs roof, window and facade repair; ADA, safety, elevator & HVAC upgrades

Edward M. Everett Dirksen U.S. Courthouse, Chicago, Illinois

- Modern-era masterpiece by Ludwig Mies van der Rohe in heart of the Loop district
- Federal Center plaza contains Alexander Calder's iconic *Flamingo* and is one of the most active downtown public spaces

- 1.2 million Rentable Square Feet
- Earns \$31 million rent annually (\$20 million Funds From Operations)
- Reinvestment need in \$161 million
- Needs full systems replacement; safety, ADA, security and cafeteria upgrade

Additional Examples: Legacy buildings requiring reinvestment for continued federal ownership

Federal Building (50 United Nations Plaza), San Francisco, California

- 290,000 Rentable Square Feet
- Contributing building to the San Francisco Civic Center National Historic Landmark District
- Significant exterior and interior spaces in excellent condition
- Could earn \$5 million rent annually at market lease rates
- Currently vacant
- Region plans to relocate GSA offices from 450 Golden Gate to 50 UN Plaza
- Needs \$106 million in reinvestment for systems, fire protection, and other modernization work, including \$15 million for seismic upgrades

U.S. Custom House, Portland, Oregon

- 84,000 Rentable Square Feet
- Currently vacant
- Could relocate tenants from leased space
- At downtown Class B rent rates, could earn \$1.4 million annually
- Needs \$17 -32 million reinvestment (in 2012 dollars) for basic to full modernization that will upgrade systems and meet current fire safety, accessibility, and other code requirements, including \$7 million in seismic work

Gus Solomon U.S. Courthouse, Portland, Oregon

- 162,000 Rentable Square Feet
- 15 percent vacant pending reinvestment needed to house bankruptcy courts
- Without reinvestment, GSA will lease space for bankruptcy courts
- 20 percent outleased as an interim measure
- At downtown Class B rent rates, could earn \$2.6 million annually
- Needs \$60 million to replace systems, upgrade life safety and meet current court and code requirements, including \$12 million for seismic work

ACKNOWLEDGMENTS

THIS REPORT HAS BEEN PREPARED BY GSA'S CENTER FOR HISTORIC BUILDINGS, IN COOPERATION WITH OUR REGIONAL PRESERVATION OFFICES AND OTHER PUBLIC BUILDINGS SERVICE (PBS) PROGRAMS INVOLVED IN ACTIVITIES AFFECTING HISTORIC BUILDINGS OR ARCHEOLOGICAL RESOURCES. WE ARE GRATEFUL TO PRESERVATION PARTNERS OUTSIDE OF GSA WHO ARE COLLABORATING WITH US ON INITIATIVES MENTIONED THROUGHOUT THE BOOK. THE NATIONAL TRUST FOR HISTORIC PRESERVATION, ADVISORY COUNCIL ON HISTORIC PRESERVATION, NATIONAL PARK SERVICE, LIBRARY OF CONGRESS, AND ASSOCIATION FOR PRESERVATION TECHNOLOGY AND HAVE SERVED AS INVALUABLE ADVOCATES FOR THE REUSE, CARE, AND RECOGNITION OF OUR PUBLIC BUILDING LEGACY.

AMONG THE MOST IMPORTANT CONTRIBUTORS ARE GSA ASSET MANAGERS, REALTY SPECIALISTS, PROJECT MANAGERS, DISPOSAL TEAMS, AND PRESERVATION STAFF WHO HAVE BROUGHT ABOUT THE SUCCESS STORIES PUBLISHED IN THIS VOLUME AND UPON WHOM WE DEPEND TO CONTINUE MAKING SUCH SUCCESSES POSSIBLE. GSA'S AGENCY-WIDE AND PBS COMMUNICATION OFFICES HAVE REINFORCED THESE ADVOCACY EFFORTS BY PROMOTING GSA'S STEWARDSHIP ACCOMPLISHMENTS WITH AWARD-WINNING EDUCATIONAL FILMS, PRESS RELEASES AND OTHER MEDIA-HARNESSING ACTIVITIES. WE HAVE ALSO BENEFITED FROM WILLINGNESS ON THE PART OF OUR OFFICE OF GENERAL COUNCIL TO USE AVAILABLE AUTHORITIES IN NEW WAYS TO ACCOMPLISH STEWARDSHIP GOALS. OUR AFFILIATE PROGRAMS WITHIN THE OFFICE OF THE CHIEF ARCHITECT HAVE ALSO SUPPORTED GSA STEWARDSHIP GOALS BY INTEGRATING PRESERVATION PRINCIPLES INTO THEIR OWN PROCESSES.

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CAROLINE ALDERSON
SEPTEMBER 2008



U.S. GENERAL SERVICES ADMINISTRATION
OFFICE OF THE CHIEF ARCHITECT
CENTER FOR HISTORIC BUILDINGS



U.S. GENERAL SERVICES ADMINISTRATION
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