

IN A SPIRIT *of* STEWARDSHIP



A Report On Federal Historic Property Management

2012

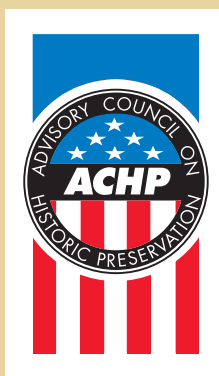


IN A SPIRIT *of* STEWARDSHIP

A REPORT ON FEDERAL HISTORIC PROPERTY MANAGEMENT

THE PRESERVE AMERICA EXECUTIVE ORDER REPORT TO THE PRESIDENT

February 15, 2012



Preserving America's Heritage

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

Milford Wayne Donaldson, FAIA, of Sacramento, California, is chairman of the 23-member ACHP, which is served by a professional staff in Washington, D.C. For more information about the ACHP, contact:

Advisory Council on Historic Preservation

1100 Pennsylvania Avenue, NW

Suite 803

Washington, DC 20004

Phone: 202-606-8503

Web site: www.achp.gov and www.preserveamerica.gov



Front cover photography (left to right): Fort Monroe Authority, NPS, ACHP

TABLE OF CONTENTS

ACKNOWLEDGEMENTS.....	v
ACRONYMS AND ABBREVIATIONS.....	vi
CHAIRMAN'S MESSAGE.....	vii
SECRETARY OF THE INTERIOR'S MESSAGE.....	ix
EXECUTIVE SUMMARY.....	x
CHAPTER 1: INTRODUCTION AND BACKGROUND.....	12
History of Executive Order No. 13287.....	12
Preserve America.....	14
Previous Section 3 Reporting.....	14
Framework for 2012 Report to the President.....	21
CHAPTER 2: CURRENT STATE OF FEDERAL REAL PROPERTY MANAGEMENT.....	22
American Recovery and Reinvestment Act (2009).....	23
Executive Order No. 13514, "Federal Leadership in Environmental, Energy, and Economic Performance" (2009).....	23
Issuance of Presidential Memorandum—America's Great Outdoors (2010).....	23
Issuance of Presidential Memorandum—Disposing of Unneeded Federal Real Estate (2010).....	26
Issuance of Presidential Memorandum—Speeding Infrastructure Development through More Efficient and Effective Permitting and Environmental Review (2011).....	29
Correlation to Agencies' Section 3 Progress Reports.....	29
CHAPTER 3: CURRENT STATE OF FEDERAL STEWARDSHIP.....	33
Contributing to the Economy.....	34
Recreation and Tourism.....	35
Cooperative Management and Use.....	39
Community Revitalization.....	42
Building Partnerships.....	44
Managing Assets.....	46
Integrating Stewardship into Agency Planning.....	51
Enhancing and Improving Inventories of Historic Properties.....	58
Summary.....	62

CHAPTER 4: FINDINGS AND RECOMMENDATIONS	63
FINDING No. 1: Economic Development and Job Creation.....	64
FINDING No. 2: Sustainability.....	66
FINDING No. 3: Renewable Energy.....	68
FINDING No. 4: Federal Real Property Realignment.....	70
FINDING No. 5: Federal Agency Preservation Programs in the 21st Century.....	73
Summary.....	75
CHAPTER 5: TOWARD A COMMON GOAL	76
CASE STUDIES	
Section 106 Program Alternatives Streamline Agency Review and Compliance.....	16
The National Park Service and Sustainability—At the Forefront of Assisting Federal Agencies.....	19
Advisory Council on Historic Preservation’s Contributions to Implementation of EO 13514.....	24
Job Creation Through Recovery Act Funding.....	27
America’s Great Outdoors and Historic Resource Stewardship.....	30
Sesquicentennial of the American Civil War (2009-2015).....	37
Leasing of Historic Properties in National Park System Units.....	41
General Services Administration Reinvests Strategically to Sustain a Public Building Legacy.....	47
Bureau of Land Management’s Renewable Energy Efforts.....	53
Closure of Fort Monroe, Virginia and Creation of a New National Monument.....	61
Preservation Green Lab: A Nonprofit’s Contribution to Sustainable Development.....	78
APPENDIX A: EXECUTIVE ORDER 13287, PRESERVE AMERICA	80
APPENDIX B: ADVISORY COUNCIL ON HISTORIC PRESERVATION MEMBERSHIP	83
APPENDIX C: ADVISORY GUIDELINES IMPLEMENTING SECTION 3: REPORTING PROGRESS ON THE IDENTIFICATION, PROTECTION, AND USE OF FEDERAL HISTORIC PROPERTIES	84
APPENDIX D: EXECUTIVE BRANCH AGENCIES’ COMPLIANCE WITH EO 13287	86
APPENDIX E: FEDERAL REAL PROPERTY REPORTING	88

ACKNOWLEDGEMENTS

The Advisory Council on Historic Preservation (ACHP) wishes to extend its appreciation and thanks to the following individuals and organizations for their time and contribution in assisting the ACHP to implement the provisions of Section 3 of Executive Order 13287:

FEDERAL AGENCY PROGRAMS COMMITTEE

Mark Sadd, Committee Chairman
 Horace Foxall, Jr., Committee Vice Chairman
 John L. Berrey
 Dorothy Lippert
 National Trust for Historic Preservation
 Department of Defense
 Department of Transportation
 Department of Veterans Affairs
 General Services Administration
 Department of Homeland Security, Observer
 National Association of Tribal Historic Preservation Officers, Observer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

John M. Fowler, Executive Director
 Reid J. Nelson, Director, Office of Federal Agency Programs
 Caroline D. Hall, Assistant Director, Office of Federal Agency Programs
 (report co-author)
 Katharine R. Kerr, Program Analyst (report co-author)
 Susan Glimcher, Director, Office of Communications, Education, and Outreach
 Ronald D. Anzalone, Director, Office of Preservation Initiatives
 Shayla Shrieves, Senior Writer-Editor
 Druscilla J. Null, Senior Program Analyst

DEPARTMENT OF THE INTERIOR

Stephanie Toothman, Associate Director for Cultural Resources, National Park Service

ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation	NASA	National Aeronautics and Space Administration
ATDA	Accountability of Tax Dollars Act	NPD	NASA Policy Directive
AGO	America's Great Outdoors	NPR	NASA Procedural Requirement
Army	Department of the Army	NCSHPO	National Conference of State Historic Preservation Officers
ARNG	Army National Guard	NEPA	National Environmental Policy Act
AMP	Asset Management Plan	NGB	National Guard Bureau
BLM	Bureau of Land Management	NHL	National Historic Landmark
BIA	Bureau of Indian Affairs	NHPA	National Historic Preservation Act of 1966 as amended
BOR	Bureau of Reclamation	NOAA	National Oceanic and Atmospheric Administration
C&O	Chesapeake & Ohio Canal	NPS	National Park Service
CFO	Chief Financial Officer	NRHP	National Register of Historic Places
C.F.R.	Code of Federal Regulations	NTHP	National Trust for Historic Preservation
CEQ	Council on Environmental Quality	NHO	Native Hawaiian organization
CBP	Customs and Border Protection	OMB	Office of Management and Budget
CPRA	Civilian Property Realignment Act	PGL	Preservation Green Laboratory
CRMP	Cultural Resources Management Plan	PA	Programmatic Agreement
DOC	Department of Commerce	RPAC	Real Property Advisory Committee
DOE	Department of Energy	Recovery Act	American Recovery and Reinvestment Act
DHS	Department of Homeland Security	SPDP	St. Petersburg Downtown Partnership
DOI	Department of the Interior	SPO	Senior Policy Official
DOJ	Department of Justice	SSO	Senior Sustainability Officer
DOT	Department of Transportation	SRPO	Senior Real Property Officer
EISA	Energy Independence and Security Act of 2007	SEZ	Solar Energy Zones
EPA	Environmental Protection Agency	SHPO	State Historic Preservation Officer
EO	Executive Order	SFFAS	Statement of Federal Financial Accounting Standards
FPO	Federal Preservation Officer	SSPP	Strategic Sustainability Performance Plan
FPMS	Federal Property Management Section	TVA	Tennessee Valley Authority
FRPC	Federal Real Property Council	Treasury	Department of Treasury
FRPP	Federal Real Property Profile	U.S.	United States
FAIA	Fellow, American Institute of Architects	USACE	United States Army Corps of Engineers
FY	Fiscal Year	USCG	United States Coast Guard
FS	Forest Service	U.S.C.	United States Code
FSM	Forest Service Manual	USFWS	United States Fish and Wildlife Service
FMA	Fort Monroe Authority	USGS	United States Geological Survey
GSA	General Services Administration	USP	United States Penitentiary
GMRA	Government Management Reform Act	USPS	United States Postal Service
HHS	Department of Health and Human Services	VCP	Veterans Curation Project
HAP	Heritage Assets Partnership	WREHPWG	Western Renewable Energy and Historic Preservation Workgroup
LEED	Leadership in Energy and Environmental Design		
Legacy Vision	Integration of a Federal Legacy Vision with GSA's Portfolio Strategy for Restructuring and Reinvesting in the Owned-Inventory		
MARAD	Maritime Administration		
MCHVF	Montessori Children's House of Valley Forge		



MILFORD WAYNE
DONALDSON, FAIA

Chairman, Advisory Council
on Historic Preservation

February 15, 2012

CHAIRMAN'S MESSAGE

In accordance with Executive Order 13287 "Preserve America," the Advisory Council on Historic Preservation (ACHP) is pleased to present its third triennial report on how well federal agencies manage the historic properties they hold in stewardship for the American people. Federal agencies provided progress reports to the ACHP in 2011, which have been summarized in this report. Based on these submissions, the ACHP has developed a series of recommendations to advance the goals of the Executive Order and the National Historic Preservation Act.

The Preserve America Executive Order requires federal agencies to provide leadership in the management of historic properties. Advancing stewardship goals is a wise investment in sustainability and creating a strong economy. The federal government faces unprecedented challenges as it works to reduce the size of its real property inventory, transform buildings into energy efficient assets, and use these assets to promote economic development and create jobs. The retention of historic properties as energy efficient and strong performing assets can contribute to these goals and, in so doing, enhance community pride.

Through a variety of agency activities and collaborative ventures, federally owned historic properties promote economic development and heritage tourism locally and regionally. For example, the National Park Service progress report indicated that visitors to its national parks contributed more than \$14.2 billion to nearby communities in 2009, and the National Aeronautics and Space Administration reports that Kennedy Space Center in Florida, a place of unparalleled historic significance, attracts 1.5 million visitors annually. With the recent designation by the President of Fort Monroe National Monument, it is anticipated that nearly 3,000 jobs will be created in the region. These statistics point to the role historic preservation plays in our economy, and the Administration's success in using it as a tool for economic growth.

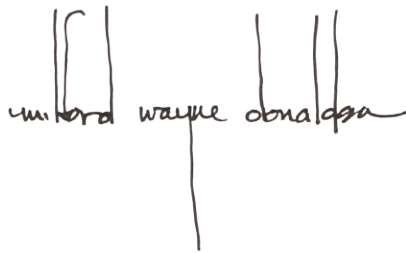
Many federal historic properties are located in Preserve America Communities, which obtain White House recognition for their commitment to protect and use their heritage assets. We are delighted that the First Lady has designated 136 such communities since January 2009, bringing the total to 872 nationwide. Through local partnerships, federal agencies support the preservation and economic development goals of these places important to so many across the country.

This report lays out specific projects and properties and the successes and challenges agencies face in ensuring proper use and potential re-use of the millions of square feet of historic property in federal hands. By considering the ACHP's

CONTINUED >>>

recommendations stemming from its thoughtful consideration of agency reports, such as encouraging partnerships and utilizing energy efficiency initiatives, agency heads and others will better understand the importance of the federal historic property inventory. Awareness of and appreciation for the value of these priceless resources under federal ownership can foster better management practices that will benefit agencies, the American people, and the historic properties themselves.

The ACHP supports Administration and agency initiatives to transform the federal government into a cost efficient, effective, and sustainable entity. We continue to encourage the Administration's leadership and interest in historic preservation and appreciate the attention given to this important report.



Michael Wayne Donaldson



KEN SALAZAR

Secretary, Department of
the Interior

February 15, 2012

SECRETARY OF THE INTERIOR'S MESSAGE

"In a spirit of stewardship" is the fundamental principle that defines the National Historic Preservation Program. For over a century, the Department of the Interior has provided leadership that sets the standard for recognizing, documenting, and preserving American history for future generations. Executive Order 13287, "Preserve America," establishes Federal policy in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government.

As Secretary of the Interior, I am charged with issuing, with the assistance of the National Park Service, a series of standards and guidelines setting forth best practices for a variety of preservation disciplines and activities. In 1998, the Department issued "Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act," which describe how Federal agencies can balance their agency missions with their historic property stewardship mandates.

I am committed to engaging our Federal, state, tribal, and local partners in the preservation of our shared heritage. Our recent initiatives pay tribute to the importance of historic preservation. The President's *America's Great Outdoors* initiative calls for the creation of new historic trails, parks, and landmarks and enhances support through the Historic Preservation Fund. The National Park Service's *A Call to Action* paves the way to ensure that the Secretary's Standards and Guidelines reflect 21st century preservation needs. Through the American Latino Heritage Initiative, we are supporting agency efforts to document Latino cultural resources. New departmental tribal consultation policies work to identify cultural resource concerns as we pursue new sources of energy to support our future growth. As we approach the 50th anniversary of the National Historic Preservation Act in 2016, I am confident that we will continue to successfully provide leadership and be effective stewards for the National Historic Preservation Program.

Ken Salazar

EXECUTIVE SUMMARY

THIS IS THE THIRD TRIENNIAL REPORT to the President required under Executive Order 13287: “Preserve America,” addressing the state of the federal government’s historic properties and their contribution to local economic development. Issued in 2003, EO 13287 reaffirmed the federal government’s responsibility to show leadership in preserving America’s heritage by “actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the federal government, and by promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties.”

Information in this document came primarily from the progress reports submitted to the Advisory Council on Historic Preservation (ACHP) in September 2011 by real property managing agencies within the executive branch, as well as stewardship meetings with policy and preservation officials committed to the stewardship of these important properties. Agency reports focused on progress made in identifying, protecting, and using historic properties in their ownership. Federal agencies continue to provide creative examples of how they have leased federal historic properties, creatively used others, established public-private partnerships, and supported heritage tourism programs and local economic development.

The ACHP reviewed these Section 3 progress reports to measure the critical progress federal agencies have made in the last three years. The ACHP is pleased to report that 24 agencies submitted reports on or after the September 30, 2011, deadline.

In assessing the progress federal agencies have made over the last three years, the ACHP has made five key findings about the current state of federal historic property stewardship along with recommendations on how agencies

Kaneohe Naval Air Station National Historic Landmark, Marine Corps Base Hawaii, Kaneohe Bay, Island of O’ahu, Hawaii



can continue to improve their performance in these areas. These findings are summarized as follows:

- » *While federal agencies and the historic properties under their ownership or control have great potential to create private sector jobs, contribute to the local economy, create public-private partnerships, improve property management practices, and contribute to local and regional heritage tourism initiatives, they have not systematically done so.*
- » *Agencies would benefit from guidance on the advantages of retaining and converting historic buildings and structures into sustainable properties that meet the Administration's goals for energy efficiency, as well as guidance on promoting the development of a sustainable federal infrastructure that recognizes the economic and environmental value of retaining historic properties.*
- » *Renewable energy initiatives present opportunities for the preservation community to think creatively about resource stewardship and management in the current economic climate but also have the potential to significantly impact historic properties.*
- » *Agencies face a significant challenge in the realignment of real property portfolios, balancing stewardship responsibilities and mission needs.*
- » *Agency strategic plans, which are prepared by senior policymakers to assist in fulfilling the agency's mission, still frequently do not address historic property management needs or establish goals for improvement at the appropriate level. As a result, many agencies experience conflicts between the National Historic Preservation Act, other statutory requirements, and Administration initiatives.*

The recommendations accompanying the findings in Chapter 4 offer a range of actions for the ACHP and its partners to further the current Administration initiatives and policies, goals of EO 13287, and NHPA related to real property management. The ACHP is committed to assisting federal agencies in moving forward with these recommendations so that future actions proposed by the Administration, and agencies themselves, recognize historic properties as important public assets worthy of full consideration in federal property management in a clean energy economy.

CREDIT: ACHP





CREDIT: NOAA

St. George Island, Alaska, is one of five Pribilof Islands located 300 miles west of the Alaskan coast. The Native Aleut (Unangan) community shares stewardship of the island and its historic fur seal and sea bird resources with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. St. George Island was designated a Preserve America Community in 2007.

CHAPTER I: INTRODUCTION AND BACKGROUND

FEDERAL HISTORIC PROPERTIES range from a nuclear merchant ship to shipwrecks, post offices to land ports of entry, office buildings to barns, and expansive archaeological sites to remote Native American sacred sites. Agencies own, acquire, and manage these diverse properties through a variety of programs and have developed wide ranging internal protocols for their inventory and stewardship.

HISTORY OF EXECUTIVE ORDER NO. 13287

EO 13287, "Preserve America," directs federal agencies to recognize that historic properties owned by the federal government are valuable assets that support agency missions and also stimulate local economic development. Agencies approach the oversight and management of historic properties differently, based on budgetary, program, and management considerations unique to each agency. While many have made the preservation and protection of historic properties a priority, others face daunting challenges given the sheer volume and condition of their historic property inventory and competing mandates.

The policy set forth in Section 1 of EO 13287 reaffirms major principles of NHPA, as amended, by recognizing that federal agencies should manage federal

historic properties in a manner that supports “the department and agency missions while contributing to the vitality of the economic well being of the nation’s communities and fostering broader appreciation for the development of the United States and its underlying values.” Section 2 of the EO focuses on the need for each agency to build preservation partnerships consistent with agency missions and governing authorities and to ensure that the department or agency encourages, supports, and fosters initiatives and investment in the protection and use of historic properties.

Section 3 of the EO established an accountability system to gauge agency implementation of the mandates of NHPA and the EO. It requires the ACHP to prepare a report to the President on the current state of the federal government’s historic properties and their contribution to local economic development. The ACHP’s report is to incorporate data submitted by real property managing agencies in accordance with Sections 3(a), (b), and (c) of the EO.

Section 4 of the EO requires each agency to promote the long-term preservation and use of historic properties as federal assets and, where consistent with agency missions, governing laws, and the nature of the historic properties, contribute to the local community and its economy.

As required by Section 4(e), in March 2004 the ACHP submitted to the President and the heads of agencies a report titled *Becoming Better Stewards of Our Past: Recommendations for Enhancing Federal Management of Historic Properties*. This report provided recommendations to (1) partner with non-federal parties, (2) work smart, and (3) enhance the preservation ethic in order to further stimulate initiative, creativity, and efficiency in the federal stewardship of historic properties.

Promoting preservation through heritage tourism is specifically called for in Section 5 of the EO. As a primary goal of the Preserve America program, federal agencies were encouraged to support community efforts to preserve and enjoy the nation’s priceless cultural and natural heritage by promoting the use of historic properties for heritage tourism and related economic development in a manner that contributes to the long-term preservation and productive use of those properties. By working with states, Indian tribes, and local communities, agencies can use historic properties in their ownership to foster viable economic partnerships in cooperation with tourism officials and others with interests in the properties.

In order to better fulfill their stewardship responsibilities, agencies are directed to consider historic properties as assets that must be cared for in a manner that reflects the broader public interest. To that end, EO 13287 requires agencies to explore partnerships for sustaining the long-term preservation and productive use of such properties. Specifically, the EO, which applies to executive branch agencies and departments, encourages agencies to foster viable partnerships with tribal, state, and local heritage tourism programs for the use of historic properties.

PRESERVE AMERICA

In 2003, the Administration established Preserve America. Participating agencies include the ACHP, the Departments of Agriculture, Commerce, Defense, Education, Housing and Urban Development, Interior, and Transportation; the General Services Administration; the Institute of Museum and Library Services; the National Endowment for the Humanities; the President's Committee on the Arts and the Humanities; and the President's Council on Environmental Quality. Executive branch activities, and the federal reporting that corresponds to this EO, form an integral part of the program. The program also encourages and supports community efforts to preserve and enjoy our priceless cultural and natural heritage. Goals include a greater shared knowledge about the nation's past, strengthened regional identities and local pride, increased local participation in preserving the country's cultural and natural heritage assets, and support for the economic vitality of our communities.

Two facets of the Preserve America program are Preserve America Communities and Preserve America Stewards. Preserve America Communities protect and celebrate their heritage, use their historic assets for economic development and community revitalization, and encourage people to experience and appreciate local historic resources through education and heritage tourism programs. There are three types of Preserve America Communities: (1) municipalities or counties with an elected governing official or unincorporated communities within their jurisdiction; (2) distinct neighborhoods within large cities or city-counties with a population of 200,000 or greater; or (3) tribal communities (federally recognized) with an elected governing official or subdivisions of such tribes. Preserve America Stewards is a designation program that recognizes programs that have demonstrated a successful use of volunteer time and commitment in order to help care for our historic heritage. Designation recognizes programs of organizations and agencies that: (1) provide volunteers with opportunities to contribute in direct and tangible ways to the preservation, protection, and promotion of historic properties; (2) address an otherwise unfilled need in heritage preservation through the use of volunteer efforts; and (3) demonstrate innovative and creative use of volunteer assistance in areas such as youth involvement, volunteer training, public education, and public-private partnerships.

PREVIOUS SECTION 3 REPORTING

The ACHP has continually acknowledged that the state of federal historic property management is improving but still in need of greater agency commitment and Administration oversight. While many federal agencies reported that they needed more funding to meet these responsibilities, the ACHP's 2009 Report to the President emphasized the federal government's need to develop a preservation ethic that considered the preservation and use of agency historic properties from the broader perspective of public benefits. The report also highlighted several areas anticipated to have an effect on real property management: sustainability, energy efficiency, and inventory reduction. Accordingly, the findings and recommendations outlined in the report were intended to assist agencies in taking

Preserve America Communities protect and celebrate their heritage, use their historic assets for economic development and community revitalization, and encourage people to experience and appreciate local historic resources through education and heritage tourism programs.

appropriate measures to meet their stewardship obligations, while recognizing the potential for their historic properties to be a catalyst for community development.

The ACHP identified six major findings in the 2009 Report to the President. The recommendations accompanying the findings offered a range of actions for federal property management agencies to consider. Many federal agencies had made real progress in identifying historic properties and reporting on their condition. However, many agencies confronted by multiple federal reporting requirements continued to provide incomplete progress reports, used and defined terminology describing their historic property inventory differently, and struggled to provide comprehensive and complete information in their inventory. The ACHP recommended that the federal agencies with real property support the development of comprehensive historic property inventories using existing reporting requirements, and noted there was continued improvement in agencies' identification of historic properties. This has been confirmed in the 2011 agency progress reports.

It was noted that agencies would benefit from guidance on how to consider the advantages of retaining and converting historic buildings and structures into better energy performers, as well as guidance on how to promote the development of a sustainable federal infrastructure that recognizes the economical and environmental value of retaining historic properties. The ACHP encouraged the Administration to launch an initiative to maximize the economic and energy efficiency of federally owned historic buildings. EO 13514, "Federal Leadership in Environmental, Energy, and Economic Performance" (2009), establishes the President's commitment to confront dependence on foreign oil; addressing the moral, economic, and environmental challenge of global climate change; and building a clean energy future that benefits all Americans. The ACHP issued guidance integrating the requirements of NHPA with Section 2(g) of EO 13514, requiring federal agencies to implement high performance federal building design, construction, operation and management, maintenance, and deconstruction. With the support of CEQ, the ACHP developed the guidance to assist federal agencies in their efforts to meet the expectations of EO 13514 and its Guiding Principles. In addition, this guidance addressed the intersection of historic preservation policy with the recommendations of the Department of Transportation and other federal agencies for selecting sustainable locations for federal facilities, prepared pursuant to Section 10 of the EO. The goal of this guidance was to assist federal decision makers, usually capital asset managers, facility managers, and other program and project managers, in their considerations regarding sustainability and historic federal buildings.

The ACHP issued guidance integrating the requirements of NHPA with Section 2(g) of EO 13514, requiring federal agencies to implement high performance federal building design, construction, operation and management, maintenance, and deconstruction.

Federal agencies that own legacy buildings and other iconic and monumental historic buildings and structures were not receiving adequate reinvestment funding to conduct needed repairs and alterations to keep these properties occupied and viable. The ACHP advocated for federal agencies' improved flexibility in using public-private partnerships through Section 412 of General Provisions, Consolidated Appropriations Act, Section 111 of NHPA, enhanced use leases, and similar authorities, consistent with agency mission and governing laws, for the

CASE STUDY

Section 106 Program Alternatives Streamline Agency Review and Compliance

FEDERAL AGENCY

Advisory Council on Historic
Preservation

LOCATION

Nationwide



CREDIT: GSA

The exterior windows of the Gerald W. Heaney Federal Building, U.S. Courthouse and Custom House, Duluth, Minnesota, were replaced in compliance with a streamlined Section 106 program alternative in 2009.

Section 800.14 of the Advisory Council on Historic Preservation's (ACHP) regulations lays out a variety of methods available to federal agencies to meet their Section 106 obligations under the National Historic Preservation Act. Each of these program alternatives allows federal agencies to tailor the Section 106 process to meet their needs. In the past three years, the ACHP has worked with a number of federal agencies to develop program alternatives. Three of those are highlighted here.

General Services Administration: Program Comment for Select Envelope and Infrastructure Repairs and Upgrades to Historic Public Buildings

In August 2009, the ACHP issued a Program Comment for the General Services Administration, setting forth the way in which GSA will comply with Section 106 for select repairs and upgrades to windows;

lighting; roofing; and heating, ventilating, and air conditioning systems within historic public buildings. The Program Comment streamlines select review protocols for GSA, facilitating their execution of repair and upgrade projects that were funded by the American Recovery and Reinvestment Act and other sources.

Projects reviewed via the Program Comment must not adversely affect the qualities that qualify a historic property for the National Register of Historic Places. The projects must also be designed by qualified preservation architects who meet the Secretary of the Interior's Professional Qualification Standards, and follow GSA's Technical Preservation Guidelines; these guidelines were determined by the National Park Service to be consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Work involving historic materials is executed by qualified firms specializing in the repair and restoration of

historic buildings, under the supervision of GSA preservation staff who also meet the Secretary of the Interior's Professional Qualification Standards.

The Program Comment is the result of consultation among GSA, the ACHP, NPS, the National Conference of State Historic Preservation Officers, the National Trust for Historic Preservation, the National Alliance of Preservation Commissions, and the National Association of Tribal Historic Preservation Officers.

National Guard Bureau: Nationwide Programmatic Agreement for Army National Guard Readiness Centers Maintenance and Repair

In December 2010, a nationwide Programmatic Agreement among the National Guard Bureau, NCSHPO, and the ACHP was executed regarding maintenance and repair projects for all

federally owned or federally supported readiness centers in all 50 states, Puerto Rico, the U.S. Virgin Islands, Guam, and the District of Columbia. Routine maintenance is defined as regular and general upkeep of a readiness center against normal wear and tear above ground. The PA does not address undertakings that could cause ground disturbance or that may affect archaeological sites, except those areas previously designated by an easement (e.g., natural gas lines) or areas where disturbance has already occurred (e.g., sidewalks) for the first six inches depth of ground disturbance. The PA also does not apply to replacement or repair of wall insulation.

An individual state Army National Guard Cultural Resources Manager is responsible for determining whether a proposed activity meets the definition of an exempted undertaking under the PA. If the proposed activity meets one or more of the definitions it is exempted from further Section 106 review. The definitions include exterior and interior activities such as painting on previously painted surfaces using similar color and non-destructive

lead paint abatement. If the proposed activity is not exempted there is a process stipulated for an individual state ARNG to follow for both no adverse effect and adverse effect determinations.

The decision to implement this PA must be made voluntary for state ARNGs, in consultation with their State Historic Preservation Officer. As of December 2011, 19 individual state ARNGs have elected to implement the PA. The Nationwide PA is a result of consultation among NGB, the ACHP, NCSHPO, NPS, Department of the Army, NTHP, and cultural resources experts in academia.

The Department of the Army: Prototype Programmatic Agreement for Army Interiors

In July 2011, the ACHP issued a prototype PA to streamline the consideration of non-contributing interiors of buildings on Army installations that contribute to a historic district that is listed in or eligible for the NRHP and for buildings that are individually listed in or eligible

for the NRHP; if an Army installation executed this prototype PA with a SHPO there would be no case-by-case review for those aspects of undertakings that may affect non-contributing interiors. The Army is steward of more than 20,000 buildings considered eligible for the NRHP. A number of Army initiatives and Executive Orders have been implemented that require installations to improve the energy efficiency and sustainability of their facilities. These initiatives have the potential to impact interiors of eligible buildings; therefore this programmatic approach will assist in the protection of historic interiors while meeting Army and Administration goals.

The Army is now authorized to convey this prototype PA to its installations and develop agreements with individual SHPOs where they are deemed necessary and appropriate. These agreements can be negotiated between an installation and a SHPO without the involvement or approval of the ACHP. The prototype PA is a result of consultation among the Army, the ACHP, NPS, NCSHPO, and NTHP.

preservation and use of these and other federally owned and controlled historic buildings and structures.

The fourth finding made was that senior policymakers had not addressed historic property management needs or established goals for improvement in agency strategic plans to support an agency's mission. The ACHP urged the Office of Management and Budget, in coordination with the Secretary of the Interior, to ensure that Senior Policy Officials are designated by all agencies in accordance with EO 13287 Section 3(e) and requested that agencies report to the ACHP, OMB, and the Secretary of the Interior once this designation had been made within one year of the 2009 report. In August 2009, the ACHP reiterated this requirement to agencies and requested such a designation during the Administration transition. The ACHP received responses from 32 departments and agencies.

In addition to the information federal agencies provided in progress reports, the ACHP identified several issues that clearly would have broad effects on property managing agencies in the coming years. One of those issues was the lack of strategies for evaluating modern-era buildings that would soon reach 50 years of age. The ACHP encouraged agencies to develop plans to identify and evaluate common property types in their portfolio and establish agency-wide management priorities for their consideration and use, and several agencies reported progress in the completion of such identification efforts and the establishment of management plans for those property types. The ACHP also encouraged agencies to establish procedures to identify historic properties or property types that may have value to state, tribal, or local communities for reuse or heritage tourism and ensure that these values are scored, using the National Register of Historic Places and the National Historic Landmark information, and considered prior to agency decisions on disposal of such properties. Based upon the 2011 progress reports, a number of agencies reported progress in that area.

And lastly, while federal agencies and the historic properties under their ownership or control have tremendous potential to contribute to local economic development through job creation, public-private partnerships, property management practices, and participation in local and regional heritage tourism initiatives, they have not systematically done so. The ACHP sought to compile and disseminate information and guidance on the economic value of federal historic property stewardship, with the potential of federal historic property contribution to local economic development, and integrate such material in future Section 3 advisory guidelines for agency use. To further this goal, the ACHP updated its advisory guidelines in 2011 with additional questions regarding agency compliance with EO 13514 and use of Sections 106, 110, and 111 of NHPA. In collaboration with the ACHP and other federal, state, tribal, and private partners, the Department of Commerce was encouraged to devise a uniform set of generally accepted metrics for measuring the direct and indirect economic impacts of historic properties at the state, regional, and local levels that could be applied nationally. The ACHP continues to advance this concept.

CASE STUDY

The National Park Service and Sustainability—At the Forefront of Assisting Federal Agencies

FEDERAL AGENCY

National Park Service

LOCATION

Nationwide



CREDIT: NPS

The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings are an important addition to current discussions about sustainability and energy efficiency.

A commonly quoted phrase, “the greenest building is the one that’s already built,” succinctly expresses the relationship between preservation and sustainability. The repair and retrofitting of existing and historic buildings is considered by many to be the ultimate recycling project, and focusing on historic buildings has added benefits for the larger community. Traditional materials are generally durable, the continued maintenance of historic buildings and features relies on local craftsmen rather than replacement parts, and these structures generally make up the heart of our towns and cities. Many organizations are providing helpful guidance on sustainable practices in historic preservation. These resources include how-to video clips, checklists, and programming to support historic properties.

The National Park Service finds that sustainability is the nexus of society, the environment, and the economy. In recognition of the role the built

environment plays in energy use, NPS has emerged as a leader among federal agencies, developing guidance and technical information on incorporating sustainable practices to reduce energy consumption, while maintaining those characteristics that make historic properties significant as part of its mission. Several NPS initiatives include the following:

The Secretary of the Interior’s Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings

The Secretary of the Interior’s Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings are an important addition to current discussions about sustainability and achieving greater energy efficiency, which have focused primarily on new buildings to date. Released in April

2011, the Guidelines stress the inherent sustainability of historic buildings and offer specific guidance on “recommended” rehabilitation treatments and “not recommended” treatments, which could negatively impact a building’s historic character. Illustrations of both types of treatments are included. The guidelines are designed to assist building owners in planning rehabilitation projects that will meet the standards for rehabilitation.

The Guidelines supplement the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, which are one of the four Secretary of the Interior’s Standards for the Treatment of Historic Properties, (the other “Standards” are preservation, restoration, and reconstruction). These four sets of standards, developed by NPS in the 1980s, fulfilled the Secretary of the Interior’s responsibility to advise federal agencies on the preservation of historic properties listed in or eligible for listing in the National Register of Historic Places.

CONTINUED >>>

CASE STUDY | The National Park Service and Sustainability—At the Forefront of Assisting Federal Agencies *(continued)*

Preservation Brief #3: Improving Energy Efficiency in Historic Buildings

At the end of 2011, the NPS issued an updated Preservation Brief #3 on energy efficiency in historic buildings. While this brief is limited to issues related to energy efficiency, and does not address the larger topic of sustainability, it updates a previous Preservation Brief #3 on energy conservation and includes information

on actions to improve energy efficiency, inherent energy efficient features of historic buildings, energy audits, and alternative energy sources.

Updated NPS Webpage on Sustainability and Energy Efficiency

NPS, Technical Preservation Services has developed a new Webpage highlighting

preservation of historic buildings and issues of sustainability, energy efficiency, and new technologies and research. This resource for federal agencies and the public includes information on such new technologies as green roofs, solar panels, and wind turbines. It also provides information on weatherization and energy conservation and features case studies highlighting projects across the country that successfully combine historic rehabilitation with green building practices.

FRAMEWORK FOR 2012 REPORT TO THE PRESIDENT

The ACHP is using five thematic areas, including four established in the 2009 Report to the President, to group findings and recommendations consistent with the goals of the EO and current Administration initiatives. They are the following:

- » **Contributing to the Economy.** Through a variety of agency activities and collaborative ventures, federally owned historic properties and preservation programs can be an excellent means for promoting economic development and heritage tourism locally and regionally.
- » **Building Partnerships.** Public-private partnerships for the identification, protection, and use of federally owned historic properties when consistent with agency missions can be effective in caring for resources, engaging volunteers, educating the public, promoting local economic development and heritage tourism, and help lessen the financial burden of federal agencies to accomplish the tenets of this EO.
- » **Managing Assets.** The establishment of procedures to ensure the protection and use of historic properties within an agency's mission will allow that agency to fully comply with NHPA and EO 13514.
- » **Integrating Stewardship into Agency Planning.** The inclusion of historic property management needs within an agency's strategic plans can significantly support the stewardship goals outlined in NHPA, EO 13287, and EO 13514.
- » **Enhancing and Improving Inventories of Historic Properties.** An accurate, comprehensive inventory and evaluation of an agency's historic properties allows a greater understanding of the value and management requirements of these historic properties. In turn, this inventory provides the necessary foundation for meeting further management goals such as disposal of unneeded federal real estate.

While the ACHP anticipated adapting these thematic categories to address future requirements, policies, and challenges in the management of federal real property, these categories continue to effectively frame a discussion on current real property management issues in the stewardship of federal historic properties.



CREDIT: BLM

Solar panels provide alternate energy on Bureau of Land Management land, California

CHAPTER 2: CURRENT STATE OF FEDERAL REAL PROPERTY MANAGEMENT

THE CURRENT STATE of federal real property management is transforming. According to the Fiscal Year 2009 Federal Real Property Statistics, prepared by GSA from the Federal Real Property Profile, the federal government owns, manages, and administers in excess of 39 million acres of land (which does not include mineral rights) and 429,000 building assets (many of which are historic), comprising approximately 3.34 billion square feet. Agencies continue efforts to ensure that the federal government's assets are mission critical, sustainable, and energy efficient. As reported in the 2009 Report to the President, the Statement of Federal Financial Accounting Standards 29 and EO 13327, "Federal Real Property Management," still have commanding influence over the inventory of a federal agency's real property and integration of a preservation ethic in overall agency strategic planning. The Obama Administration took a number of actions in the past three years that have had an effect on federal real property management and the federal stewardship of historic properties. A summary of several of these actions and their relationship to the stewardship of historic properties follows.

AMERICAN RECOVERY AND REINVESTMENT ACT (2009)

The Recovery Act was an unprecedented effort to jumpstart the economy and create or save millions of jobs. OMB issued guidance in March 2009, that recognized compliance with the National Environmental Policy Act and NHPA was required for Recovery Act projects. Many of the projects funded through the Recovery Act supported the preservation and productive use of federal historic properties and directly benefited local economic vitality and infrastructure and opportunities to demonstrate the economic value of preservation through job creation, community revitalization, and sustainable development.

EXECUTIVE ORDER NO. 13514, “FEDERAL LEADERSHIP IN ENVIRONMENTAL, ENERGY, AND ECONOMIC PERFORMANCE” (2009)

EO 13514 states that

the policy of the United States that Federal agencies shall increase energy efficiency; measure, report, and reduce their greenhouse gas emissions from direct and indirect activities; conserve and protect water resources through efficiency, reuse, and stormwater management; eliminate waste, recycle, and prevent pollution leverage agency acquisitions to foster markets for sustainable technologies and environmentally preferable materials, products, and services; design, construct, maintain, and operate high performance sustainable buildings in sustainable locations; strengthen the vitality and livability of the communities in which Federal facilities are located; and inform Federal employees about and involve them in the achievement of these goals.

Major provisions of this EO include the reduction of federal greenhouse gas emissions by FY 2020; the development of Strategic Sustainability Performance Plans; advancement of regional and local integrated planning; implementation of high performance sustainable federal building design, construction, operation and management, maintenance, and deconstruction; and the establishment of the Steering Committee on Federal Sustainability and Agency Senior Sustainability Officers.

ISSUANCE OF PRESIDENTIAL MEMORANDUM—AMERICA’S GREAT OUTDOORS (2010)

President Obama issued this Presidential Memorandum directly to the Secretaries of the Interior and Agriculture, the Administrator of the Environmental Protection Agency, and the Chair of the CEQ. Through outreach, interdepartmental coordination, interagency collaboration, and reporting, President Obama challenged the federal government, the nation’s largest land manager, to support community-driven efforts to identify the places that mean the most to Americans. This includes historic and cultural resources, leveraging the support of the private sector and nonprofit organizations, and establishing partnerships to reconnect these spaces to Americans and each other with a

CASE STUDY

Advisory Council on Historic Preservation's Contributions to Implementation of EO 13514

FEDERAL AGENCY

Advisory Council on Historic
Preservation

LOCATION

Nationwide



CREDIT: ACHP

The Department of Treasury's Washington, D.C. headquarters was awarded Leadership in Energy and Environmental Design Gold certification from the U.S. Green Building Council in December 2011. It is believed to be the oldest building to achieve Gold status in the world. The rehabilitation of this National Historic Landmark is believed to produce an estimated \$3.5 million in energy and lease cost savings annually to the Treasury. It is an example for other federal agencies in meeting the goals of EO 13514 and protection and use of historic assets.

Rehabilitation of historic properties can play a critical role of the sustainability strategy set forth in Executive Order 13514, "Federal Leadership in Environmental, Energy, and Economic Performance," and the Advisory Council on Historic Preservation (ACHP) is encouraging the full integration of preservation into the federal government's policies and programs addressing energy efficiency and community livability. Since almost half of the country's greenhouse gas emissions come from the construction, operation, and demolition of buildings, the reuse and retrofit of historic buildings can lead to significant reductions in these emissions, a principal goal of EO 13514. In addition, preservation of historic properties directly supports the EO's emphasis on strengthening the vitality and livability of communities in which federal facilities are located.

The ACHP established a Task Force on Sustainability and Historic Preservation

in 2010. The Task Force members include representatives of the Departments of Energy, Housing and Urban Development, Interior, and Transportation; the Environmental Protection Agency; the Architect of the Capitol; the National Trust for Historic Preservation; the National Conference of State Historic Preservation Officers; and it is chaired by an ACHP expert member, who is an architect. Other ACHP members participating in the Task Force include representatives of the General Services Administration and the Departments of Defense and Veterans Affairs. With the assistance of the Task Force, the ACHP has completed or initiated a number of activities related to energy efficiency and community livability.

Notable among the initiatives addressing energy efficiency was the development of guidance, *Sustainability and Historic Federal Buildings*, released in May 2011 and available on the ACHP Web site. The

ACHP developed the guidance to assist federal agencies in their efforts to meet the expectations of EO 13514 regarding retrofitting of federally owned buildings while also meeting the requirements of the National Historic Preservation Act. In addition, this guidance addresses the intersection of historic preservation policy with the recommendations of the Department of Transportation and other federal agencies for selecting sustainable locations for federal facilities, prepared pursuant to Section 10 of EO 13514. The goal of this guidance is to assist federal decision makers, usually capital asset managers, facility managers, and other program and project managers, in their considerations regarding sustainability and historic federal buildings.

The ACHP also has contributed to the national dialogue on energy efficiency by commenting on a variety of relevant standards and guidelines that are under

development or recently issued, including the following: the Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings and the National Park Service's revised Preservation Brief #3: Conserving Energy in Historic Buildings; the U.S. Green Building Council's revised Leadership in Energy and Environmental Design Green Building Rating Systems; the federal Interagency Sustainability Working Group's revised "Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings;" and the revised International Green Construction Code. The ACHP also commented to the Department of Energy

on ways to ensure that historic properties are adequately addressed in its proposed Commercial Building Asset Rating Program, its commercial building workforce guidance, and its proposed rule on energy efficiency and sustainable design standards for new federal buildings.

Regarding preservation and sustainable community development, the ACHP provided comments to EPA on its new "School Siting Guidelines" and advised it on the selection of a preservation demonstration project for funding through its Smart Growth Implementation Assistance Program. The ACHP also served on the working group which developed the

recommendations central to the Council on Environmental Quality's "Guidance for Federal Agencies on Sustainable Practices for Designed Landscapes."

During 2012, the ACHP Sustainability Task Force will continue to promote consideration of historic properties as federal agencies comply with the requirements of EO 13514 regarding the energy performance of existing buildings and sustainable community development. The Task Force also will work to identify opportunities for federal agencies to address sustainability through the review process established by Section 106 of NHPA.

21st century conservation and recreation agenda. Specifically the memorandum required a report on America's great outdoors that provided the following:

- » a review of successful and promising nonfederal conservation approaches;
- » an analysis of existing federal resources and programs that could be used to complement those approaches;
- » proposed strategies and activities to achieve the goals of the initiative; and
- » an action plan to meet the goals of the initiative.

A report was issued in February 2011 which included a specific goal to protect America's historic and cultural resources, recognizing that historic preservation can revitalize communities, serve as a catalyst to bolster local economies, support local businesses, and increase job opportunities. The report put forth two recommendations related to cultural resource management: the federal government should (1) elevate the importance of cultural resources planning, protection, and interpretation in the federal land management agencies and, (2) expand support for state, tribal, and community historic preservation efforts for capital projects, planning, interpretation, community-based surveying, and technical assistance that support partnerships and community-based preservation activities.

ISSUANCE OF PRESIDENTIAL MEMORANDUM— DISPOSING OF UNNEEDED FEDERAL REAL ESTATE (2010)

President Obama has directed the executive branch to eliminate wasteful spending of taxpayer dollars, save energy and water, and further reduce greenhouse gas pollution, pursuant to EO 13514, and the Federal Data Center Consolidation Initiative by:

- » accelerating efforts to identify and eliminate excess real property;
- » taking immediate steps to make better use of remaining real property as measured by utilization and occupancy rates, annual operating cost, energy efficiency, and sustainability;
- » to the extent permitted by law, include accelerating cycle times for
 - » identifying excess assets and disposing of surplus real property;
 - » eliminating lease arrangements that are not cost effective;
 - » pursuing consolidation opportunities within and across agencies in common asset types (such as data centers, office space, warehouses, and laboratories);
 - » increasing occupancy rates in current facilities through innovative approaches to space management and alternative workplace arrangements, such as telework; and
 - » identifying offsetting reductions in inventory when new space is acquired.

OMB was directed to work with GSA and the Federal Real Property Council to issue guidance for actions agencies should take to carry out the requirements

CASE STUDY

Job Creation Through Recovery Act Funding

FEDERAL AGENCY

U.S. Army Corps of Engineers

LOCATION

Nationwide



CREDIT: USACE

A participant in the Veterans Curation Project is working with records associated with an archaeological investigation.

The United States Army Corps of Engineers administers one of the largest federal collections of archaeological artifacts and associated records. Most of these collections were excavated during construction of reservoirs and associated water control programs from 1947 to 1985. Federal law requires that these archaeological collections be stored in a manner to ensure their long-term preservation and to facilitate access for scientific research and public education. Using American Recovery and Reinvestment Act funding, the USACE established a unique and beneficial program to manage these collections and provide temporary employment and training to wounded veterans. Project participants are employed in a structured and supportive environment, earning full- or part-time salaries as they acquire skills to help them reintegrate into the civilian workforce.

USACE St. Louis District's Mandatory Center of Expertise for the Curation and Management of Archaeological Collections developed the Veterans Curation Project with \$3.5 million

in Recovery Act funding to provide training with professional archaeological laboratory management specialists to wounded veterans, teaching them to describe, process, and curate USACE archaeological collections using a variety of standard and specialized processes and equipment found in a professional archaeological and archival processing laboratory.

The VCP has two goals:

- » Train veterans in technical skills including cataloging, database and records management, preserving historical documents, digital photography, scanning, and making information available online.
- » Curate and reduce the backlog inventory of artifacts, images, and records from collections owned and/or managed by USACE.

Three VCP laboratories have been opened in the past two years: Augusta, Georgia; St. Louis, Missouri; and Washington, D.C./

Alexandria, Virginia. Assistant Secretary of the Army (Civil Works) Jo-Ellen Darcy, speaking at the Augusta VCP laboratory public opening said, "No group of people has done more to forge our national identity throughout history than the veterans who have served and sacrificed for the nation. It is our privilege to now be able to give disabled veterans an opportunity to continue shaping the nation through the work and training they will do at this important new facility."

To date, 77 veterans have been trained by the VCP, and nine veterans are currently being trained in the St. Louis laboratory. Training resumed in the Augusta and Alexandria laboratories in January 2012. Forty-one veterans who participated in the VCP have obtained long-term employment using the skills gained in the VCP program in combination with their previous military experience, and 16 veterans have continued their education at colleges, universities, and certificate programs.

The USACE, and its St. Louis District, received the Advisory Council on Historic

CONTINUED >>>

CASE STUDY | Job Creation Through Recovery Act Funding *(continued)*

Preservation Chairman's Award for Federal Achievement in Historic Preservation for the VCP in December 2009. The VCP is facing an uncertain future due to federal budget constraints and is looking for an infusion of funding to continue its valuable program for veterans.

An initiative to support USACE districts in compliance with Section 110 of the National Historic Preservation Act was undertaken using \$25 million in Recovery Act funding. Work proceeded in 36 USACE districts to survey and identify archaeological and historic cultural resources on USACE fee-title lands. A readily accessible map of cultural resources using Geographic Information Systems software is being created for use with CorpsMap. This funding promoted efforts which were at first believed to be accomplished in a decade yet were completed in less than two years with a substantial gain to the cultural resources management industry. Nineteen individual private sector firms were sustained by these efforts. Lastly, USACE used \$1.2 million in Recovery Act funding to

improve USACE compliance with the Native American Graves Protection and Repatriation Act. It is anticipated this will streamline the cataloguing of artifacts held by the USACE and lead to the appropriate disposition of human remains to appropriate tribal entities in an expedited manner.

Through these innovative projects funded through the Recovery Act, the USACE has shown leadership in creating partnerships to manage cultural resources while assisting wounded veterans through productive work opportunities, as well as in fulfilling various federal responsibilities in an expedited manner.



United States Army Corps of Engineers Mississippi Valley Division Commander Major General John W. Peabody reviews data entry for archaeological investigations with a participant in the Veterans Curation Program.

CREDIT: USACE

of the memorandum. A legislative proposal (known as the Civilian Property Realignment Act) was introduced in Congress under H.R. 1734 and S. 1503 in 2011. OMB established a Real Property Advisory Committee in May 2011 to continue making progress on minimizing waste and the efficient disposal of federal real property. The RPAC will consist of three Senior Real Property Officers and four Chief Financial Officers selected by the OMB Controller. The RPAC will operate under three basic principles: (1) spending on inefficient real property is no longer an option; (2) new technologies have changed how the government does its work; and (3) better management of real property helps achieve sustainability goals.

ISSUANCE OF PRESIDENTIAL MEMORANDUM— SPEEDING INFRASTRUCTURE DEVELOPMENT THROUGH MORE EFFICIENT AND EFFECTIVE PERMITTING AND ENVIRONMENTAL REVIEW (2011)

This Presidential Memorandum states that

to maintain our Nation's competitive edge, we must ensure that the United States has fast, reliable ways to move people, goods, energy, and information. In a global economy, where businesses are making investment choices between countries, we will compete for the world's investments based in part on the quality of our infrastructure.

Recognizing that the federal government has a central role in ensuring that infrastructure projects move as efficiently as possible, President Obama has instructed federal agencies to “(1) identify and work to expedite permitting and environmental reviews for high-priority infrastructure projects with significant potential for job creation; and (2) implement new measures designed to improve accountability, transparency, and efficiency through the use of modern information technology” in partnership with state, local, and tribal agencies. Secretaries of Agriculture, Commerce, Housing and Urban Development, the Interior, and Transportation have each identified high-priority projects effecting infrastructure projects on and off federally controlled land.

CORRELATION TO AGENCIES' SECTION 3 PROGRESS REPORTS

Collectively, these federal initiatives aim to produce better organization and efficiency for federal agencies managing property inventories. Agencies are collecting and reporting real-time property data that can be used to determine which properties should be maintained, require cost-effective repairs, or qualify for disposal. However, despite the general trend toward improvement, agencies continue to face many of the same challenges in the management of historic properties in 2012 that were initially reported by the ACHP in 2009. These include the following:

CASE STUDY

America's Great Outdoors and Historic Resource Stewardship

FEDERAL AGENCY

Various Federal Agencies

LOCATION

Nationwide



CREDIT: TIMOTHY E. BLACK / GREATER LICKING COUNTY CONVENTION AND VISITORS BUREAU

Members of the Licking County Bicycle Club cross the historic Squire Whipple Bow String Truss Bridge along a public recreation trail in Newark, Ohio.

President Barack Obama issued the America's Great Outdoors Presidential Memorandum directly to the Secretaries of the Interior and Agriculture, the Administrator of the Environmental Protection Agency, and the Chair of the Council on Environmental Quality in 2010. Through outreach, interdepartmental coordination, and reporting, President Obama challenged the federal government, the nation's largest land manager, to support community-driven efforts to identify the places that mean the most to Americans, to include historic and cultural resources, leverage the support of the private sector and nonprofit organizations, and establish partnerships to reconnect these spaces to Americans and each other with a 21st century conservation and recreation agenda.

After extensive study and outreach, a report issued in February 2011, included eight sets of findings and recommendations to implement AGO goals. In addition to recommendations related to land and water conservation, outdoor recreation, natural resource management, and community and

youth education and outreach, the report recommended improvements to cultural resource management planning as well as support for relevant historic preservation partnerships. Other programmatic recommendations, for example on public outreach, explicitly include fostering appreciation for cultural heritage values as part of AGO.

Since its inception and the report to the President, agencies have been pursuing AGO goals through interagency work as well as careful examination of individual agency program priorities for Fiscal Year 2012 and beyond. While not specifically identified as supporting the AGO initiative, several of the 2011 Section 3 progress reports described public-private partnership projects and programs that support AGO goals.

On February 25, 2009, about 100 refuge visitors, neighbors, and partners joined U.S. Fish and Wildlife Service Deer Flat National Wildlife Refuge staff to celebrate 100 years of working together for wildlife. Centennial preparations began when the

Friends of Deer Flat Wildlife Refuge applied for a Preserve America Grant to conduct historical research about the refuge and reservoir. With grant funds, matching and in-kind contributions from 11 partners, and assistance from a variety of Friends members and refuge volunteers, the project is nearing completion. Project partners and volunteers have made a variety of contributions, including donations of cash, assistance with historical research, laying out and designing interpretive signs, a pamphlet, and much more.

The U.S. Army Corps of Engineers, Albuquerque District, Cochiti Lake, and the Jemez Canyon Dam Projects are located on the reservations of the Pueblo de Cochiti and the Pueblo of Santa Ana. The Albuquerque District has been working closely with the Pueblo de Cochiti to compile a baseline data set of tribal assets and historic documentation regarding USACE interaction with the federally recognized Indian tribe. This includes data such as natural, water, and

archaeological resources as well as historic photography and Geographic Information System data. For the past two years the Pueblo de Cochiti has sponsored the USACE Native American Environmental and Cultural Resources Training at the Pueblo. In 2007 and 2009 Cochiti Pueblo middle school students attended day trips to two archaeological sites in the Cochiti Lake Campground where Albuquerque District archaeologists and biologists explained how the USACE and the

Pueblo are working together to identify and document natural, biological, and archaeological resources. This helps the students learn about the local landscape and how USACE projects relate to the modern Pueblo.

In October 2011, a progress report and action plan took these recommendations a step further, outlining combined conservation and recreation successes, including gains in youth employment,

new trail designations, the creation of urban campgrounds, and investments in large landscape conservation. In addition to natural and cultural resource values, the progress report detailed how America's public lands and private farms, ranches, and forests provide vital jobs and economic, educational, and social benefits to citizens and communities across the country.

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

Recognition of these new challenges resulted in the ACHP revising its Section 3 Advisory Guidelines in 2011 to address the current Administration's policies and directives. Through an agency's submission of its progress reports, federal agencies play a key role in assisting the ACHP in fulfilling these goals:

- » Federal agencies can use Section 3 progress reports to assess the effectiveness of and improve their preservation programs in conjunction with existing reporting requirements, both internally and externally.
- » The process of gathering information, analyzing data, and developing the Section 3 progress reports can assist the ACHP and federal agencies in evaluating agency efforts to incorporate the identification, protection, and use of historic properties into overall agency strategic planning and asset management.
- » Consistent Section 3 progress reporting by federal agencies enhances the quality and utility of the ACHP's Report to the President on the status of federal preservation programs.

Agencies were further encouraged to report on their progress in resolving the issues identified in the ACHP's 2009 Report to the President.

Recognition of these new challenges resulted in the ACHP revising its Section 3 Advisory Guidelines in 2011 to address the current Administration's policies and directives.



CREDIT: FS

The renovation of the Koen Building at the Ozark-St. Francis National Forest, Arkansas, has kept the historic fabric intact and brought the building up to current accessibility standards and building codes. An addition designed to resemble the original building was certified Leadership in Energy and Environmental Design Gold in July 2010.

CHAPTER 3: CURRENT STATE OF FEDERAL STEWARDSHIP

AS AGENCIES MEET THE GOALS of inventory reduction, sustainable infrastructure, and fiscal responsibility, the requirements of identification, protection, and use of historic properties informs federal agencies in meeting these Administration initiatives. The progress reports submitted in 2011 demonstrate federal agencies are utilizing a broad range of tools, approaches, and partnerships to achieve the objectives of EO 13287.

Using the five established thematic areas under the framework described in Chapter 1, the ACHP reviewed all the 2011 Section 3 progress reports submitted. The ACHP developed the 2011 advisory guidelines to assist agencies by providing a reporting framework that could be used to integrate information from multiple reporting requirements. A review of these progress reports demonstrated that agencies continue to make progress in the identification, protection, and use of historic properties in their ownership, yet they confront many challenges in doing so, some different than previously identified. The following summarizes this progress in the five thematic areas identified by the ACHP. Because not all agencies used the advisory reporting guidelines, and they are not mandatory, the information provided was not universally comparable.

Agencies' 2011 Section 3 Progress Reports are available on the ACHP Web site. Appendix D provides a full accounting of agency reporting.

CONTRIBUTING TO THE ECONOMY

Through a variety of agency activities and collaborative ventures, federally owned historic properties and preservation programs can be an excellent means for promoting economic development and heritage tourism locally and regionally. Public-private partnerships provide opportunities for states, tribes, and localities to generate tax revenues, tourism dollars, jobs, and other tangible economic benefits.

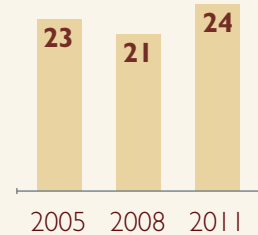
The 2009 Report to the President found:

While federal agencies and the historic properties under their ownership or control have tremendous potential to contribute to local economic development through job creation, public-private partnerships, property management practices, and participation in local and regional heritage tourism initiatives, they have not systematically done so.

With some notable exceptions, this does not appear to have changed significantly since the 2008 reporting cycle. The National Park Service progress report indicates that visitors to its national parks, many of which center on the protection and interpretation of nationally significant historic properties, contributed more than \$14.2 billion to nearby communities in 2009. This striking statistic conveys the enormous impact that heritage tourism alone can have on local economies and the clear value for the investment of federal dollars in this endeavor. By their own admission, agencies struggle to develop accurate and meaningful methods to measure and report these impacts, a fact that remains evident in the 2011 progress reports. Very few summary statistics were reported for these impacts other than by NPS. Many communities, whether or not they technically serve as “gateways” to these lands, continue to rely heavily on the presence of national parks, national forests, public lands, or other federal assets for local and regional economic benefits, including heritage tourism. Therefore, issues related to the condition of such assets and the agency’s commitment to maintaining them remain fundamentally important to these communities. When included early on in the development of heritage tourism and economic redevelopment initiatives relating to historic properties, it is these stakeholders who can bring to an agency’s attention the community’s long-term vision and goals for using and benefitting from such properties.

A major federal presence, including the existence of significant federally owned or managed lands and assets, can have a tremendous impact on local economies. However, it is not a simple matter to identify those instances where historic properties under federal ownership or control are specifically contributing to local economic opportunity, job creation, or increased investment. Occasionally a direct link can be demonstrated through the presence of a significant federally owned historic property that is a local or regional tourism attraction (e.g., the Statue of Liberty), a federal historic property that is managed or operated by a private

AGENCY PROGRESS REPORTING BETWEEN 2005, 2008, AND 2011



Please note that the number of agencies reporting continues to fluctuate as agencies self select out of future progress reporting, individual bureaus and agencies submit progress reports separately from parent agencies or will no longer submit from the parent agency, or the agency does not submit a progress report.

enterprise for profit (e.g., a historic lodge), or a federal property that is in active use in a community for its original, or a modified purpose, and is helping to anchor other area economic development (e.g., a federal courthouse).

Several federal agencies reported on projects and programs they have carried out over the last several years that have helped support local economic development either directly or indirectly. Examples of agency programs and partnerships are given below in three general categories: recreation and tourism, cooperative management and use, and community revitalization. Each of these sectors has the potential to create jobs and support economic vitality.

RECREATION AND TOURISM

On many public lands, historic properties may become attractions whose economic worth is included in more general measurements of outdoor recreation use. According to the 2011 Department of the Interior report on the Department's contributions to the U.S. economy,

“Americans and foreign visitors made some 439 million recreation-related visits to Interior-managed lands in 2010. These visits supported over 388,000 jobs and contributed over \$47 billion in economic activity. This economic output represents about 8% of the direct output of tourism-related personal consumption expenditures for the United States for 2009 and about 1.3% of the direct tourism related employment.”

Of this total, approximately \$30.39 billion and 246,956 jobs are attributable to NPS, \$3.98 billion and 32,564 jobs to the U.S. Fish and Wildlife Service, \$7.43 billion and 58,947 jobs to the Bureau of Land Management, and \$6.07 billion and 49,660 jobs to the Bureau of Reclamation. A similar 2011 report from the Forest Service found that “recreation activities on National Forests and Grasslands sustain 223,000 jobs in the rural communities within 50 miles of the national forests and grasslands, where visitors purchase goods and services for their recreational activity. Visitors spend \$13 billion directly in those communities within 50 miles of the national forests and grasslands.”

The nation's public lands constitute important national economic assets. National Parks, National Wildlife Refuges, and large portions of the public lands contribute to employment through a wide range of uses, visitor services and concessions, outfitters and suppliers, and other sectors. These are largely private-sector jobs. Concessionaires or outfitters may run businesses that focus on day tours or back-country trips to important sites on public lands, such as remote archaeological sites, rock art sites, or similar destinations.

Tourism in general is big business. In 2010, travel and tourism directly contributed \$759 billion to the U.S. economy. Travel and tourism is one of America's largest employers, directly employing more than 7.4 million people and creating a payroll income of \$188 billion, and \$118 billion in tax revenues for federal, state, and local governments. In addition to creating new jobs, new business, and higher property values, well-managed tourism improves the quality of life and builds community

and regional pride. According to a 2009 national research study on U.S. Cultural and Heritage Travel by Mandela Research, 78 percent of all U.S. leisure travelers participate in cultural and/or heritage activities while traveling translating to 118.3 million adults each year. Cultural and heritage visitors spend, on average, \$994 per trip compared to \$611 for all U.S. leisure travelers.

Heritage tourism is the business or practice of attracting and accommodating visitors to a place or area based especially on the unique or special aspects of that locale's history, landscape, and culture. It can also be an important agent in promoting community pride, enhancing quality of life, and educating present and future generations. As communities try to understand and appreciate their own heritage, and focus on presenting their heritage to tourists and other visitors, they gain increased appreciation for what they themselves have. Communities must make decisions about local priorities in preservation, in public interpretation, in visitor services, and in other investment. Reuse and revitalization of historic properties for visitors, if carefully managed, can help protect important resources and assist the community in retaining its unique identity and sense of place. Heritage tourism can also bring attention to the stories and traditions of the past that are most important to the community's foundations and to its continued development and vitality.

Several federal agencies reported on creative tourism strategies given security constraints. BOR's primary mission to deliver water and power defines the use of its facilities, historic or otherwise. Historic dams, power plants, irrigation structures, and buildings that continue to support that mission are in active use. Security concerns and dangerous conditions severely restrict public visitation opportunities at BOR's historic properties. Although security and safety concerns limit opportunities to utilize active historic properties to promote local economic development and heritage tourism, BOR continues to seek "offsite" opportunities to inform the public of its historic properties and foster heritage tourism. BOR maintains a cultural resources Web site with a page called "Promoting Our Past" that provides information on viewing BOR historic properties and visitor centers. Hoover Dam NHL continues to be a tourist destination for visitors to the Las Vegas, Nevada, area, and behind-the-scenes tours of the dam remain popular. Grand Coulee Dam on the Columbia River between Oregon and Washington is regionally known for a laser light show projected on the dam's downstream face. The light show, supported by a pre-recorded narrative, presents BOR's account of events leading to construction of the dam. It is a sufficiently significant tourist attraction that local hotels note a reduction in business when the light show is not operating.

The National Aeronautics and Space Administration's stewardship of historic properties has consistently featured a visitor component. These public programs have had a huge economic impact on the areas surrounding Kennedy Space Center in Florida, and have also resulted in significant benefits near other major NASA facilities like Johnson Space Center in Houston, Texas. Where practical, NASA has provided access to the public to view significant places in the nation's space program history. Kennedy Space Center's Visitors' Center continues to draw

Reuse and revitalization of historic properties for visitors, if carefully managed, can help protect important resources and assist the community in retaining its unique identity and sense of place.

CASE STUDY

Sesquicentennial of the American Civil War (2009-2015)

FEDERAL AGENCY

Various Federal Agencies

LOCATION

Nationwide



CREDIT: © JEFF MAURITZEN AND DISCOVER PRINCE WILLIAM & MANASSAS, VA

Reenactment of the First Battle of Bull Run, Prince William County, Virginia (July 2011)

The 150th anniversary of the American Civil War is taking place from 2009-2015. Unlike some past commemorations, such as the U.S. Bicentennial in 1976 or the Lewis and Clark Bicentennial in 2003-2006, there is no national commission leading the planning. Various states have formed state commissions, some of them well-funded. Even where official commissions are not established, most activity is being conducted on the state and local level, but the federal government can and will play a huge role in advancing and supporting this effort.

More than 70 units of the National Park System have resources related to the history of the Civil War, from its beginnings to the Confederate surrender at Appomattox Courthouse, Virginia. The National Park Service has established a special Web site dedicated to the Civil War Sesquicentennial. In addition, federal agencies are also featuring selected historic properties that played a role in the war years. For example, the U.S. Fish and Wildlife Service manages the Grove Plantation House on the Ernest F. Hollings Ashepoo, Combahee, and Edisto

Basin National Wildlife Refuge, South Carolina, one of only three antebellum mansions in that area to survive the Civil War. While used for USFWS office space, it is now open for visitor tours during the sesquicentennial. Within the Department of Defense, in addition to obvious associated holdings like West Point, New York, and the U.S. Naval Academy, Annapolis, Maryland, some installations manage related sites. Civil War sites at Aquia Creek, Virginia, connected with Civil War naval action along the Potomac, on Marine Corps Base Quantico, have had award-winning research work and interpretation.

Events leading up to the Civil War began at least 18 months before Fort Sumter, South Carolina, was fired upon. In 2009, John Brown's 1859 raid on the federal arsenal at Harpers Ferry, West Virginia, and subsequent trial and hanging, became the focal point of dozens of commemorative activities in West Virginia, Maryland, Pennsylvania, and Virginia. Visitation at this pivotal NPS site at Harpers Ferry National Historical Park, West Virginia,

increased by nearly 8 percent from 2008 to 2009. NPS also partnered with the ACHP, Harpers Ferry Middle School, and the Journey Through Hallowed Ground Partnership to create a service learning project to engage young people in this history. The project featured a series of podcasts which the students produced about stories of John Brown's raid that they found fascinating. These podcasts are now officially a part of the park's interpretive material for the public. At Fort Sumter, reenactment programs and other events recognize the April 1861 Confederate bombardment and occupation of the fort, while visitor center and educational programs focus on the home front and the war's origins.

The Civil War Sesquicentennial promises to have a positive economic impact on many communities, while building an important educational and tourism base for the future. Manassas National Battlefield Park in Prince William County, Virginia, (a Preserve America Community) was the site of two major battles in 1861 and

CONTINUED >>>

CASE STUDY | Sesquicentennial of the American Civil War (2009-2015) *(continued)*

1862. A local analysis of economic impacts from a series of public events and activities held over a three-day weekend in July 2011 found that the City of Manassas increased its restaurant revenue by more than \$800,000 compared to the previous July. This resulted in a 14 percent increase in the collected meals tax. About 55 percent more sales tax revenue for the month was generated in the city's Old Town historic area, as well as nearly 11 percent more lodging tax receipts. This was in spite of a heat wave forcing curtailment of some events and reduced overall visitor numbers.

The 13 most-visited National Park units associated with the Civil War, including Gettysburg National Military Park, Pennsylvania; Vicksburg National Military Park, Mississippi; Lincoln Home National Historic Site, Illinois; Ford's Theatre National Historic Site, Washington, D.C.; and Arlington House, The Robert E. Lee Memorial, Virginia, had an average 700,000 visitors in 2010, part of the combined nine million visitors the entire National Park System saw that year. NPS anticipates that these sites will mostly have additional increases between now and the end of the

anniversary period in 2015, in spite of the overall economy.

In addition to its economic value, the Civil War Sesquicentennial is generally raising the visibility of history and preservation, and focusing public attention on family, community, and the roots of our modern social and political systems while building outstanding public-private partnerships.

more than 1.5 million annual visitors with the majority taking tours that enter the Center and drive by many iconic and historic sites.

Highlights of the tour of Johnson Space Center are the historic Mission Control Center from the Apollo era and other working historic properties housing significant shuttle artifacts and functioning simulators. Visitor centers are maintained at several other NASA facilities, and the majority of NASA Centers have displays or museums with exhibits depicting the history of each location and the role it has played in the nation's space program. NASA maintains a cooperative agreement with the Smithsonian Institution to display its artifacts at the National Air and Space Museum, thus providing for the long-term care and protection of many items associated with NASA's unique history.

The Department of Energy is associated with five major museums located at or near DOE field sites: the American Museum of Science and Energy, Oak Ridge, Tennessee (a Preserve America Community); the National Museum of Nuclear Science and History, Albuquerque, New Mexico; the Bradbury Science Museum, Los Alamos, New Mexico; the Columbia River Exhibition of History, Science, and Technology, Richland, Washington; and the Atomic Testing Museum, Las Vegas, Nevada. Many DOE field sites maintain visitor centers focusing on presenting the science and technology related to that particular DOE national laboratory or facility. The Office of Legacy Management's Weldon Spring, Missouri, and Fernald, Ohio, sites document the history of the sites and facilities, remediation efforts, and provide trails for hiking, biking, and bird watching. "The Secret City Festival" is presented by the City of Oak Ridge, Tennessee, the Arts Council of Oak Ridge, and the Oak Ridge Convention & Visitors Bureau each year to celebrate the history and heritage of Oak Ridge and to honor those who lived and worked there during and after the Manhattan Project. The festival has grown to become one of the premiere festivals in the region, drawing more than 25,000 visitors annually.

Periodic historic anniversaries and commemorations can be of great value in focusing agency involvement and directing support for heritage tourism. The year 2009 also marked the 40th anniversary of the Apollo moon landing, with celebrations and events held across the country. Recognition of the War of 1812 bicentennial starting in 2012 and ending in 2015 is being planned as a major activity by the Department of the Navy, the United States Coast Guard, and numerous partners.

COOPERATIVE MANAGEMENT AND USE

Cooperative management can be an effective tool to reduce resource burdens on federal agencies while improving the stewardship of historic properties. There are a variety of approaches that agencies take in cooperatively managing their historic properties and making them available for continual use. In some agencies concession agreements dictate the management terms of historic lodging or other major visitor facilities to concessionaires. The ACHP saw an increase in agency reporting uses of alternative management strategies, including the use of leases under various federal authorities. As expected, NPS and GSA provided the

most information concerning such alternative management strategies. GSA notes that it uses Section 111 in order to maintain historic buildings and retain rental revenue which is then reinvested in the historic buildings relieving GSA from some of the financial liability of maintaining the property with appropriated funds. However, GSA also notes in its progress report “declining out leasing revenue as GSA relocates tenants from expiring leases or culls the inventory of underutilized buildings” as “a healthy reflection of progress toward a sustainable portfolio.”

In 1982, NPS implemented a historic property leasing program authorized under Section 111 through publication of regulations, 36 C.F.R. Part 18, Leasing of Properties in Park Areas. In 2002, NPS revised these regulations to implement not only NHPA authority but also a new leasing authority, Section 802 of the National Parks Omnibus Management Act of 1998, which authorizes leasing of any real property and allows NPS to retain the income generated. Many of the leases authorized by NPS provide for the rehabilitation of the property by the lessee in lieu of rent, allowing NPS to reprogram funding to preserve other historic properties. NPS, as with FS at historic Timberline Lodge on Mount Hood, Oregon, continue to maintain historic and iconic National Park accommodations through concession agreements in some of the major western parks. Properties currently being leased by NPS include the following:

- » The Henry Piper Farmhouse at Antietam National Battlefield, Maryland, which remains as part of the 1862 interpreted battlefield landscape and in active use as a bed and breakfast business;
- » The West House and Christian Smith House at Chesapeake & Ohio Canal National Historical Park, Washington, D.C., Maryland, Virginia (a number of Lock Keeper’s houses along the C&O are also made available for overnight accommodation through the C&O Canal Trust partner organization); and
- » Fort Baker at Golden Gate National Recreation Area, California, through a 60-year lease with a San Francisco developer, who has restored Fort Baker and built Cavallo Point, a luxury lodge with a spa, cooking school, and other visitor facilities. Cavallo Point also serves as the home of the Institute at the Golden Gate, an environmental program of the nonprofit Golden Gate National Parks Conservancy in partnership with NPS.

Recognizing the benefits of reuse, FS reported continued use of its entrepreneurial activity to explore and develop conversions and adaptive uses and reported its continued successes through its Recreation Cabin and Fire Lookout Rental Program. Despite the fact that FS has no formal policy to retain non-mission-critical properties in its inventory, it has been able to retain some excess administrative properties by converting them to recreation rental cabins for public use.

NASA has identified Section 111 of NHPA as a useful tool to encourage the use of historic buildings that are no longer actively needed and cannot be easily disposed or removed from NASA property. GSA successfully used Section 111 at the John W. McCormack U.S. Post Office and Courthouse in Boston,

CASE STUDY

Leasing of Historic Properties in National Park System Units

FEDERAL AGENCY

National Park Service

LOCATION

Valley Forge National Historical Park, Pennsylvania



CREDIT: NPS

In its rehabilitation of the David Walker Farmstead, the Montessori Children's House of Valley Forge replaced the barn's single story with a two-story wing to accommodate classrooms.

In 1982 the National Park Service implemented the leasing of historic property authorized by Section 111 (16 U.S.C. § 470h-3) of the National Historic Preservation Act by publication of regulation 36 C.F.R. Part 18: Leasing of Properties in Park Areas. In 2001, NPS adopted a new regulation (by amending 36 C.F.R. Part 18) that generally governs the leasing of park area real property to third parties. The new Part 18 combines in one regulation the general NPS leasing authority provided by Section 802 of the National Park Omnibus Management Act of 1998 (16 U.S.C. § 1a-2(k)) with the NPS leasing authority for historic property provided by Section 111 of NHPA, which authorizes NPS to lease not only historic property, but any real property and to retain the income. These authorities are two of five general authorities and many park-specific authorities available to NPS to manage real property in the National Park System.

At Valley Forge National Historical Park, Pennsylvania, NPS exercised these leasing authorities when it leased the David Walker Farmstead to the Montessori Children's House of Valley Forge, an established

community-based pre-school and not-for-profit 501(c)3 organization. The Farmstead is a 3.7-acre site located on the southern boundary of the park and includes a National Register of Historic Places-eligible main house and root cellar, and a non-contributing barn, tenant house, and several small outbuildings. None of the buildings were present during the Revolutionary War encampment of George Washington's Army, and the property does not relate to the central theme of the park. In 1978, the federal government acquired the farm, which remained in a use-and-occupancy permit until 2003, during which time the tenant did not maintain the property and the buildings fell into poor condition. After 2003, the buildings were vacant and became a target for illegal activities. During Valley Forge National Historical Park's General Management Plan process, an internal management plan each park is required to develop, it was determined that there was no feasible use of the Farmstead for visitor services or park operations, and that adaptive use was an appropriate option.

At its own expense, MCHVF invested \$3.8 million in rehabilitating the historic

main house in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Following rehabilitation work, MCHVF opened its doors in February 2010 with six classrooms, a large multi-purpose room for gym and art, a meeting room dedicated for parents, two age appropriate playgrounds, and an athletic field. All future maintenance activities will be done in accordance with a maintenance and preservation plan approved by NPS.

Features of the project include the following:

- » The main house being used for school meeting space and a residence for one teacher and family;
- » A single-story addition to the barn for classrooms;
- » Demolition of 1958 concrete-block buildings and construction of a parking lot, which is screened and not visible from either Valley Forge National Historical Park or a nearby neighborhood; and
- » Reuse of the original driveway to the project to accommodate drop-off and pick-up of students.

Massachusetts, for several years to keep the building occupied and generate revenue needed to rehabilitate the building into office space for EPA and other federal tenants. USCG continues to operate its very successful historic lighthouse program, through which USCG maintains automated aids to navigation (navigation lights, foghorns) while making the historic lighthouses and/or keeper's quarters themselves available to local governments and nonprofit organizations for interpretive, lodging, and other uses.

The United States Army Corps of Engineers used an enhanced use lease for a building within the Little Rock District to the City of Ozark, Arkansas, which nominated the building to the NRHP and now uses it as a community information center. It is clear however that leasing authorities, such as Section 111, cannot be uniformly implemented by all federal agencies. For agencies like the Department of the Treasury, all buildings in their inventory are in active use. And some agencies, like BOR, have buildings that are designed for such specific uses they cannot be easily adapted for others. However, even agencies with these limitations did report being aware of the authorities and were willing to use them when feasible.

COMMUNITY REVITALIZATION

The federal government contributes directly or indirectly to community revitalization through the historic buildings it owns, controls, manages, or leases. In spite of recent trends away from the symbolic federal presence in many places, characterized by the closure or relocation of postal facilities and the consolidation of offices and courts, there are still many opportunities for the federal government to contribute to local economies. EO 13006, "Locating Federal Facilities on Historic Properties in Our Nation's Central Cities," issued in 1996, directs agencies to "strengthen our Nation's cities by encouraging the location of Federal facilities in our central cities." Consistent with NHPA, agencies should also "provide leadership in the preservation of historic resources, and in the Public Buildings Cooperative Use Act of 1976 to acquire and utilize space in suitable buildings of historic, architectural, or cultural significance." In September 2011, CEQ released its required "Implementing Instructions—Sustainable Locations for Federal Facilities" in accordance with Section 5(b) of EO 13514. Federal agencies are instructed to prioritize facility locations in central cities and rural town centers, focusing on the sustainable practice of co-location and mixed-use siting of federal facilities in central business districts and suburban/rural town centers. While these instructions were released at the end of the Section 3 reporting period, the ACHP anticipates that these instructions will inform federal agencies when establishing facilities, either through new construction or reuse of existing buildings within these locations.

There are numerous projects, large and small, underway at GSA facilities throughout the country that meet the letter and the spirit of EO 13006 and contribute to local economic development and opportunity. The oldest building in GSA's portfolio, the Robert C. McEwen U.S. Custom House in Ogdensburg, New York (a Preserve America Community), was constructed in 1809-1810 for private use, then leased and later acquired by the government. A landmark on

...the federal government can use its historic assets as catalysts for investment and larger-scale community development in the surrounding area or adjacent neighborhoods.

the Ogdensburg riverfront, it received a new lease on life and a new standing seam metal roof as a result of Section 111 procedures, providing upgraded facilities for Customs and Border Protection operations. The building celebrated its bicentennial in 2009.

A United States Geological Survey office in downtown St. Petersburg, Florida (a Preserve America Community), was established through a partnership with the University of Southern Florida and the St. Petersburg Downtown Partnership to renovate and reuse a historic Studebaker automobile dealership. The SPDP completed the renovation of the dealership to USGS specifications. Subsequently the USGS St. Petersburg Marine Science Center was renovated in consultation with the SPDP and the St. Petersburg Preservation Society, helping to fulfill EO 13006 requirements. Similarly, a USGS Water Science Center in downtown Tacoma, Washington, which is leased through GSA, is housed in a renovated former Kress department store. When renovated for the new use, the outside historic façade and windows were retained along with the original 1929 Kress logo.

The Department of Labor has worked on a number of renovation projects for its Cincinnati Job Corps Center residential and career training facility in Cincinnati, Ohio. Originally built in 1897 by the Sisters of Mercy and used as a high school, several renovation projects have been completed to enhance the training and living environment at the center. A project completed in 2010 replaced the original, deteriorated windows and louvers with new insulated windows. Several students in the construction training program have been involved in the renovation work.

In 2011, the United States Postal Service transferred ownership of the Birmingham Post Office, Birmingham, Michigan, to a private developer with historic covenants to maintain three sides of the building allowing the fourth, or north/rear façade, to be converted into a new building entrance to provide direct public access into the main downtown commercial district. The private developer retained and restored the original clerestory skylights and maple wood floors. As part of the Shain Park Historic District, the rehabilitation of the building provides access onto a vibrant downtown retail district and meets the needs of the Birmingham real estate market. Currently, 10 companies lease space in the building.

In Atlanta, Georgia, with the help of a Save America's Treasures grant, NPS is completing work on an \$8 million renovation of the Ebenezer Baptist Church on Auburn Avenue, part of the Martin Luther King, Jr. National Historic Site. The complex and the National Historic Site, including the Visitor Center, the Birth Home, and the King Center, have provided a catalyst for significant revitalization in the Sweet Auburn neighborhood area of Atlanta. A second project that has been accredited with helping reverse decline in Atlanta's historic downtown core and spurring preservation and reinvestment in adjacent neighborhoods is GSA's recently completed rehabilitation of the Martin Luther King, Jr. Federal Building for its Southeast Regional Headquarters was recently awarded Leadership in Energy and Environmental Design Gold certification from the U.S. Green Building Council. This proactive protection and use of a historic asset received the ACHP Chairman's Award for Federal Achievement in Historic Preservation in February 2012.

The federal government has historically had a significant and symbolic presence in many community downtowns. Whether embodied in a local U.S. post office, a multipurpose federal office building, or a national park unit, the federal presence Downtown has a long history. When federal property managers recognize the important role these properties play in a community's vitality and economic well-being and act to continue their contribution in changing times, the federal government can use its historic assets as catalysts for investment and larger-scale community development in the surrounding area or adjacent neighborhoods.

BUILDING PARTNERSHIPS

Agencies benefit from public-private and federal partnerships for the protection and use of federally owned and controlled historic properties, as they help leverage federal funds and staff to ensure effective stewardship. A few highlights of agencies' use of partnerships include the following:

- » NPS leverages its operations with partnerships in all areas of management and at all levels of the organization to provide additional resources, encourage diversity of visitors and employees, and link communities and education institutions. The Volunteers-in-Parks Program saw 221,000 volunteers donating 6.4 million hours of service to park units in 2010 for a total value of \$133.4 million. This program, with more than 370 volunteer programs throughout the NPS, has grown an average 5-7 percent annually since 1990.
- » Treasury fosters an internal partnership between bureaus to exchange "best practices" to demonstrate and provide feedback on preservation projects. In addition, the Treasury Historical Association has provided Treasury with funding for preservation projects within the Main Treasury Building over the past three years resulting in the building maintaining its original appearance. The Treasury Historical Association has currently undertaken a capital campaign effort to fund additional projects in the future.
- » FS Heritage Program reports approximately 30,000 Passport in Time (a Preserve American Steward) volunteers have donated 1.4 million hours at a total public value of more than \$20 million.
- » BLM reports partnerships are used for stabilization, interpretation, inventory, rehabilitation, curation, and site stewardship, augmenting the cultural resources management program's budget between \$2 and \$3 million annually. Of all the volunteer hours provided to BLM, between 6 and 11 percent of those benefit the cultural resources program.
- » USFWS has created successful partnerships with higher education institutions, non-profit organizations, and federal agencies. These include the following:
 - » Georgia Southern University in the discovery of Camp Lawton, one of the most intact Civil War archaeological sites found in decades, in 2010 at the Bo Ginn National Fish Hatchery and Magnolia Springs State Park, Georgia;

- » Lewis and Clark National Historic Trail Heritage Foundation Manitou Bluffs Chapter and the Arrow Rock State Historic Site for the interpretation of the Jameson Island Unit at the Big Muddy National Fish and Wildlife Refuge, Missouri, through a Preserve America Grant; and
 - » NPS, in partnership with the Ounalashka Corporation, for the Lost Villages Project to document four Unangan Aleut villages in Alaska which disappeared in 1942 with the Japanese attack on Dutch Harbor, and the invasion of Attu and Kiska, and the U.S. government mandated evacuation of the Aleutian Islands, within the Alaska Maritime National Wildlife Refuge.
- » USACE reports that without partnerships with the Kansas Archaeological Association, Kansas State Historical Society, and the University of Kansas in 2011, the evaluation and mitigation of the Coffey Site at Tuttle Creek Lake, which is eroding due to natural causes, would not have been possible.
 - » The Maritime Administration has benefited from partnerships with nonprofit groups. A private nonprofit group provided the funding for the restoration of the Nuclear Ship *Savannah's* original sofa in the ship's main lobby, while MARAD restored the sofa's structural foundation and elements of the main lobby.
 - » DOE's Office of History and Heritage Resources has partnered with NPS to implement the Manhattan Project National Historical Park Study Act (P.L. 108-340). The joint DOE/NPS study team looked at whether the historic properties at the three major Manhattan Project sites—Oak Ridge, Tennessee, Hanford, Washington, and Los Alamos, New Mexico—should be made part of the National Park System. In November 2009, a draft of the study was released to the public. In July 2011, the Secretary of the Interior, with DOE concurrence, recommended to Congress the establishment of a three-site Manhattan Project National Historical Park, with further recommendations that the park be managed as a partnership between NPS and DOE.

Agencies continue to report partnerships with Indian tribes to facilitate the identification, protection, and use of historic properties. Under the NHPA, federal agencies must consult with Indian tribes and Native Hawaiian organizations when carrying out federal actions. Where properly conducted, such consultation becomes the basis for long-term cooperative relationships. When it is not, agencies invariably face conflict and delay.

In 2008, the ACHP, recognizing the benefit of providing additional guidance to federal agencies and other stakeholders on consulting Indian tribes, published "Consultation with Indian Tribes in the Section 106 Process: A Handbook." This guidance was developed primarily to aid federal agencies in consulting Indian tribes on a broad variety of issues relating to the federal preservation program, including their participation in efforts to identify, protect, and use historic properties in accordance with this EO.

Following this success, the ACHP published "Consultation with Native Hawaiian Organizations in the Section 106 Process: A Handbook" in 2011. Created by the ACHP's Office of Native American Affairs, this handbook provides step-by-

step guidance for consulting with Native Hawaiian organizations when a federal undertaking may impact historic properties of religious and cultural significance to them. NHO consultation, mandated by NHPA and the ACHP's regulations, often presents challenges for federal agencies and NHOs. This handbook clarifies the federal responsibility to consult with NHOs, and complements the 2008 tribal handbook, encouraging federal agencies to establish partnerships with these preservation partners. Both of these handbooks are available on the ACHP Web site.

MANAGING ASSETS

The 2011 progress reports demonstrate that challenges in addressing historic property management needs and issues related to development of business plans, ongoing facilities management, and capital improvement projects and programs remain. Many reports did note, however, that initiatives related to real property management (EO 13327) and sustainability (EO 13514) have had a positive effect on agencies' abilities to manage historic properties. One of the most effective methods to protect historic properties is maintaining their productive use, evidenced by many agencies who reported the continued use of historic properties in their inventory.

Having substantially implemented the *Integration of a Federal Legacy Vision with GSA's Portfolio Strategy for Restructuring and Reinvesting in the Owned-Inventory* by 2008, GSA has moved to a more comprehensive core assets analysis by disposing of poorly performing properties within its inventory and focusing on maintenance and investment of its core assets. The Legacy Vision includes strategies for financially troubled historic buildings, with the goal of maximizing the number of historic buildings identified as core assets able to generate sufficient rental revenue to support their long-term maintenance and reinvestment. Under NHPA and EO 13006, federal agencies are required to use historic buildings to the greatest extent possible and to give first considerations to locating government offices in historic properties. While GSA continues to struggle with tenant expectations and policy goals, maintaining occupancy of historic buildings is a priority, with the goal of keeping public buildings in public ownership. GSA uses historic buildings in five ways:

- » Reinvest in them so they can serve the modern federal workforce;
- » Reprogram them for new uses when necessary;
- » Outlease them to private tenants when there is no immediate federal need;
- » Lease them from nonfederal building owners;
- » Acquire them to meet federal needs.

GSA encourages tenants submitting new space requests to consider reuse of historic buildings where achievable. GSA realty specialists play a crucial role in meeting these goals by working with tenants to think creatively about special needs and the unique qualities historic properties can provide. Through the use of feasibility studies, the sustainable action of reusing historic buildings can be properly evaluated as alternatives to new construction and disposal of historic buildings. Rising new construction costs and recent directives calling for agency use of government-owned space over leased space supports the use of structures

One of the most effective methods to protect historic properties is maintaining their productive use, evidenced by many agencies who reported the continued use of historic properties in their inventory.

CASE STUDY

General Services Administration Reinvests Strategically to Sustain a Public Building Legacy

FEDERAL AGENCY

General Services Administration

LOCATION

Nationwide

At the General Services Administration's Public Buildings Service, business policy is based on tenant needs, urgency, fiscal soundness, community support, stewardship priorities, and other considerations—all conditioned on the quantitative criterion of acceptable return-on-investment. More than one-third of GSA's 1,676 owned buildings are more than 50 years old, and more than one-fourth of the inventory, 479 buildings, is listed in or eligible for the National Register of Historic Places. As caretakers of this sizable historic portfolio, GSA's Center for Historic Buildings and Regional Historic Preservation Officers ensure stewardship strategies are in step with agency-wide business strategies.

GSA works to keep historic buildings occupied and in repair by investing strategically, drawing from multiple funding sources. Testament to GSA's integrative planning, as well as the viability of their historic buildings, they invested \$1.665 billion—40 percent of the agency's American Recovery and Reinvestment Act funding—on comprehensive modernizations and limited



GSA's 2011 Section 3 Progress Report, *Extending the Legacy*, summarizes progress made in the identification, protection, and use of historic properties.

CREDIT: GSA

scope sustainability upgrades at 150 GSA historic buildings. Major modernization projects are underway at six courthouses; a 1931 custom house; three monumental federal buildings; and headquarters buildings for the Departments of Health and Human Services, Commerce, Interior, State, and GSA (Washington, D.C).

GSA also uses other innovative tools to fund preservation. The oldest building in GSA's portfolio, the Customs and Border Protection-occupied Robert C. McEwen U.S. Custom House (Preserve America Community Ogdensburg, New York), a landmark on the St. Lawrence riverfront, received a new standing-seam metal roof using Section 111 funds. In addition, GSA's historic properties are given additional weight for capital investment planning, using decision assisting software which considers many factors when comparing reinvestment options. GSA also utilizes reimbursable work authorizations, wherein tenant agencies fund improvements to their own facilities.

GSA continues to address technical challenges to historic preservation creatively. GSA has, and continues, to meet Administration sustainability and energy reduction goals by looking for opportunities throughout the building and site; creating envelope, system, and daylight management synergies; and reducing overall energy demand in historic buildings. Many limited scope projects, including heating, cooling, and lighting improvements, were addressed in a Section 106 Program Comment tied to GSA's Technical Preservation Guidelines, to streamline compliance and standardize submissions resulting in no adverse effect determinations. The Wayne N. Aspinall Federal Building and U.S. Courthouse (Grand Junction, Colorado) will be GSA's first net zero historic building. Work was also finished at the John W. McCormack U.S. Post Office and Courthouse (Boston, Massachusetts), GSA's first historic Leadership in Energy and Environmental Design Gold building rehabilitation, and the award-winning Martin Luther King, Jr.

CONTINUED >>>

CASE STUDY | General Services Administration Reinvests Strategically to Sustain a Public Building Legacy *(continued)*

Federal Building (Atlanta, Georgia), a LEED Gold rehabilitation, received the Advisory Council on Historic Preservation Chairman's Award for Federal Achievement in Historic Preservation in February 2012.

In 2009, GSA released new illustrated guidelines, *Lobby Security in Historic Buildings*, which provides guidance for layout, equipment placement, and detailing to minimize adverse effects associated with security processing activities. GSA also honors public access commitments

by hosting public events at its buildings, and incorporating public access as Section 106 mitigation. Specifically, in 2010, GSA worked with the Alabama State Historic Preservation Office to open their Freedom Riders Museum in the historic Montgomery Greyhound bus terminal, acquired as part of an adjacent courthouse expansion. GSA is also finalizing an agreement with the National Museum of Civil War Medicine, which will allow them to open the Clara Barton Missing Soldiers Office Museum in downtown Washington, D.C.

GSA's Center for Historic Buildings considers its triennial Preserve America reporting requirement as an opportunity to promote successes, identify emerging issues, and engage GSA business lines in supporting stewardship strategies. GSA's report, *Extending the Legacy*, can be found on the GSA Web site, with color illustrations, hyperlinks, and videos.

within the federal government real property inventory. GSA has long recognized that proper care of historic properties depends not only on technical competence of staff but also on the availability of funding to maintain and reinvest in historic properties. Accordingly, GSA's overall strategy focuses first on use and second on the appropriate care of historic buildings.

FS acknowledges that not all historic properties share the same significance or reuse potential. Accordingly, the agency manages those properties in a manner that will maximize the public benefit. In doing so, the Heritage Program has developed criteria to identify Priority Heritage Assets that are or should be actively maintained in the FS real property inventory. The designation of a historic property as a Priority Heritage Asset means it is a heritage asset of distinct public interest.

In FY 2011, the Armed Forces Retirement Home drafted a 10-year Capital Improvement Plan for its two campuses in Gulfport, Mississippi, and Washington, D.C. The agency's Cultural Resources Manager participated in all phases of the development of the plan and was engaged throughout the planning and drafting phases. This plan captures anticipated capital improvements through FY 2021. Historic Preservation and Stabilization is one of five agency programs that will be supported and implemented through these capital improvements, and specifically eight (17 percent) of the 47 projects are proposed for the Washington, D.C. campus.

NPS reported that since its 2008 progress report, the number of units in the National Park System has risen from 387 to 395, covering more than 84 million acres in 49 states, the District of Columbia, and U.S. territories. By using the Asset Priority Index and Facility Condition Index, park units determine project funding eligibility for assets in "good" or "fair" condition. Repair and rehabilitation funding is generally applied to facilities in "poor" condition. The Cyclic Maintenance for Historic Properties program is used for the preservation and stabilization of historic properties. It provides the means to accomplish park maintenance activities that occur on a fixed cycle longer than once in two years. This program is managed at the NPS regional office level and incorporates a number of regularly scheduled preventive maintenance procedures and preservation techniques into a comprehensive program that allows NPS to effectively manage historic properties. In FY 2010, NPS spent \$19.7 million on cyclic maintenance projects.

Other successes noted in progress reports were the following:

- » The rehabilitation of a NPS building within the Golden Gate National Recreation Area-managed area of the Presidio of San Francisco NHL by the National Oceanic and Atmospheric Administration for its Ocean Climate Center in 2010;
- » The restoration of the patio at the American Merchant Marine Museum, Kings Point, New York, by MARAD in 2011;
- » NPS stabilization of six Pearl Harbor bungalows at the World War II Valor in the Pacific National Monument in Honolulu, Hawaii; and

- » The Department of Justice received a national award, from Masonry Construction Online, in 2010 for the preservation of a masonry smoke stack at United States Penitentiary Lewisburg, Pennsylvania.

Three agencies reported the use of Recovery Act funding to successfully manage historic properties:

- » GSA successfully undertook modernization and sustainability upgrades at 150 historic buildings with \$1.665 billion;
- » NPS rehabilitated the John Nelson House at Minute Man National Historical Park, Massachusetts; and
- » FS rehabilitated the Keller Cabin in the Mendocino National Forest, California.

Many agencies reported on the growing volume and cost of deferred maintenance of historic properties. While continuing to manage historic properties, agencies often struggle to fund and implement regular condition assessments of historic properties in their inventory. Despite these challenges, numerous agencies reported successes in managing historic properties.

- » On a scale of 1 to 10, with 10 being excellent, the condition of historic properties within the real property inventory of the Department of Health and Human Services was rated 7.5.
- » Since 2008, FS has raised the number of Priority Heritage Assets managed to standard to just over 50 percent (3,389 of 6,747 total Priority Heritage Assets as of July 2011).
- » During an annual condition assessment of all NASA buildings and structures, historic properties average 3.5, on a five point scale, while NASA properties overall averaged 3.3. NASA reports that 94 percent of its historic properties are currently being used.
- » NPS reports 57.4 percent of historic properties are in good condition.
- » BLM instituted a new performance measure in 2007 which set yearly goals for the percentage of properties in good condition; BLM met this goal with 49 percent in 2008, 2009, and 2010.

Agencies reported on improvements managing historic properties in order to meet the sustainability goals of EO 13514. For example, GSA is developing federal facility location policy refinements, extending the historic city center preference for location of federal offices to include historic town centers and main streets. GSA also achieved its first LEED Gold rating for the rehabilitation of the John W. McCormack U.S. Post Office and Courthouse in Boston, Massachusetts. Work is currently underway for GSA's first net zero historic building at the Wayne N. Aspinall Federal Building and U.S. Courthouse in Grand Junction, Colorado.

FS has identified historic properties as a key part of a new era of energy conservation and sustainable technologies. As historic buildings are identified for

With tight federal budgets, many agencies reported challenges managing historic properties due to limited resources for rehabilitation work and maintaining cultural resources staff.

rehabilitation, FS evaluates their suitability for incorporation of sustainable energy technologies. The renovation of the Koen Building at the Ozark-St. Francis National Forest, Arkansas, has kept the historic fabric intact and brought the building up to current accessibility standards and building codes. An addition designed to resemble the original building was certified LEED Gold in July 2010.

Other agencies are including sustainability considerations into individual projects wherever possible. BOR's Pacific Northwest Region, in partnership with the Bonneville Power Administration, modernized lighting in two of the historic power plants at Grand Coulee Dam, Washington, earning an EPA "Champions of Environmental Leadership and Green Government" award in 2010. And Treasury reported it was retroactively seeking LEED Existing Building certification for its 1996-2006 renovation of the Main Treasury Building, and in fact was certified LEED Gold in December 2011. It is believed to now be the oldest building to achieve Gold certification. In addition, EPA reports a developing relationship with a private utility company to install and operate an electricity-producing solar plant at the NRHP-eligible Edison Laboratory Facility in Edison, New Jersey, in a manner that will not adversely affect the historic property.

With tight federal budgets, many agencies reported challenges managing historic properties due to limited resources for rehabilitation work and maintaining cultural resources staff. In BOR's Lower Colorado Region, the Southern Nevada Public Land Management Act funding, which is generated from the sale of federal land, is expected to significantly decrease due to a drop in land sales associated with the sharp decline in the southern Nevada housing market. This loss of funds will have a direct effect on the rehabilitation and interpretation efforts at the Hoover Dam NHL.

Several agencies reported challenges reconciling their existing inventories with current and future mission needs. For agencies whose missions are technical in nature, such as NASA and HHS, continued use of older buildings and structures in their inventories may only be feasible if they are adaptable to evolving technologies. However, agencies such as Treasury have reported successfully using updated technologies in a compatible way with historic properties. This potential tension between old and new was also addressed by GSA, who reported on the increasing competition between contemporary workspaces in new construction and build-to-suit scenarios in adaptively reused historic buildings.

INTEGRATING STEWARDSHIP INTO AGENCY PLANNING

The 2011 progress reports demonstrate progress by the reporting agencies in the stewardship of historic properties and strengthening of their preservation programs. However, it is also evident that many agency strategic plans do not include stewardship goals at the agency level. Given the emphasis on a sustainable federal government, including a sustainable real property inventory, integrating stewardship into agency planning provides federal agencies with the knowledge and tools needed to reach the goals established in EO 13514.

For the first time in the Tennessee Valley Authority's history, it will be developing a Cultural Resources Management Plan to establish program goals for the identification, evaluation, and protection of historic properties. In May 2008, the TVA Board of Directors approved a TVA Environmental Policy and the development of a Natural Resource Plan, to include cultural resources management, to commit itself to a more systematic and integrated approach to managing stewardship. The CRMP will be a component of the Natural Resource Plan to establish a baseline for historic property conditions and status and set goals for future management of those identified properties. Programs will include archaeological monitoring and protection, preservation, EO 13287, and archaeological outreach. It is anticipated that TVA will complete the CRMP by the next Section 3 progress reporting cycle, and future progress reports will be guided by and include activities with the Natural Resource Plan and the CRMP.

FS reported the Forest Service Manual 2360, *Heritage Program Management*. FSM 2360 continues to provide greater consistency across the FS on all levels through the standardization of policy directives that promote protection through adaptive use of historic properties. The policy guidance ensures that all Heritage Program staff work toward a common goal of promoting efficient and effective management of all heritage resources maintained by FS. FS has also developed an annual update to the *National Heritage Strategy: It's About Time*. These updates assign priorities to specific Heritage Program leaders, develop training and workforce succession planning, and identify sustainable operation potential. Successes of the Heritage Program in the past three years include the following:

- » Use of the previously reported Infra database Heritage Module. This module has enhanced and streamlined the process of identification and monitoring heritage assets as supported by the National Heritage Information Management Initiative.
- » Development of the "Heritage Program Managed to Standard." This internal performance measure accurately shows and reflects the direction of FSM 2360 with seven new indicators facilitating precise tracking of all heritage assets managed by the Heritage Program. This new measure creates metrics by which the strengths and weaknesses of the Heritage Program at the regional and National Forest levels can be monitored more closely.

The progress report submitted by NASA provided information on a primary NASA Policy Directive that is further expanded through policy memoranda or requirements known as NASA Procedural Requirements. Further directives are then provided through handbooks that provide detail on processes and practices. The NPD for environmental management (which includes historic preservation) is NPD 8500.1. In 2009, NASA issued an Interim Directive (NM 8500-80) which specifically addresses cultural resource management. In 2011, NASA completed an NPR for Master Planning which will direct Master Planners to align specific Master Plans with Sections 106 and 110 and emphasize reuse of eligible facilities. While NASA does not have distinct policies that distinguish between identification, protection, and use of historic properties, the same policies identified through

CASE STUDY

Bureau of Land Management's Renewable Energy Efforts

ENTITY

Bureau of Land Management

LOCATION

Western U.S.



CREDIT: ACHP

Wind farm in Oregon

In recent years the Bureau of Land Management has built a comprehensive renewable energy program to address the large number of renewable energy projects proposed by private entrepreneurs for placement on BLM-managed lands. Among other initiatives, the Energy Policy Act of 2005 established a goal for the BLM to approve a minimum of 10,000 megawatts of non-hydropower renewable energy on BLM lands by the year 2015. The agency has also responded to the Administration's emphasis on developing solar, wind, and geothermal resources, and ensuring the appropriate transmission of that energy to the locations where it is needed.

Environmental compliance under the National Environmental Policy Act and the National Historic Preservation Act's Section 106 process on renewable energy-related proposals constitute a significant responsibility for the agency. BLM has created a range of internal teams and procedures—as well as joined interagency efforts—to ensure efficient, effective consideration of these proposed

projects. The Department of the Interior and BLM annually defines a list of priority projects in order to focus resources on the utility-scale projects that have a high potential for success rather than addressing proposals on a first come, first served basis. BLM took a hard look at “lessons learned” from 2010 energy projects and developed detailed new guidance that requires pre-application meetings with project proponents and guides field staff in screening applications. BLM hosts weekly national conference calls, which include representatives of agencies such as the Advisory Council on Historic Preservation (ACHP) and the U.S. Fish and Wildlife Service, in order to monitor progress on priority projects in the NEPA and Section 106 processes. BLM's NEPA Review Strike Team ensures that priority project documents receive both immediate and concurrent review by a team of Washington, D.C. Office specialists. BLM and the ACHP also participate in the Renewable Energy Rapid Response Team and Rapid Response Team for Transmission, which work to facilitate

interagency coordination and cooperation on energy projects. Together the ACHP and BLM created the Western Energy and Historic Preservation Workgroup to ensure that historic preservation values are considered efficiently in energy project planning and implementation.

Reviewing and approving large-scale energy projects challenged BLM's capacity in terms of knowledge as well as workload. BLM has taken steps to increase capacity by establishing Renewable Energy Coordination Offices within state and local BLM offices in those areas with a high demand for renewable energy projects and by adding personnel where needed, including cultural resource specialists. There have been concerted efforts to increase understanding, such as offering a Renewable Energy Summit to communicate across the organization the importance of this issue, providing additional training for managers and specialists, and creating an active renewable energy Web site for the agency and external parties, including applicants.

CONTINUED >>>

CASE STUDY | Bureau of Land Management's Renewable Energy Efforts *(continued)*

BLM and the Department of Energy are preparing a joint NEPA Programmatic Environmental Impact Statement to evaluate utility-scale solar energy development on BLM-managed lands in six western states. BLM, serving as the lead federal agency, plans to establish Solar Energy Zones on lands within Arizona, California, Colorado, New Mexico, Nevada,

and Utah that are best suited for utility-scale production of solar energy. To meet its Section 106 responsibilities for this undertaking, BLM is consulting on a Programmatic Agreement that lays out the process for completing Section 106 on project-specific proposals within the SEZs as proponents submit applications to use BLM-managed land.

Since at least 2005 the BLM has focused on renewable energy issues and how to accomplish the ambitious goals set by the Administration. The agency has thoughtfully addressed the capacity and communications issues over time, resulting in a comprehensive and effective renewable energy program.

NPD 8500.1, NM 8500-80, and individual internal reporting methods at each of the NASA Centers through Integrated Cultural Resources Management Plans, support the use of historic properties and provide a foundation for revitalization and stewardship.

At GSA's Public Buildings Service, the agency's business policy is based on tenant needs, urgency, fiscal soundness, community support, and other practical considerations conditioned on the quantitative criterion of acceptable return-on-investment. GSA's national preservation program is collaborating with regional preservation staff and asset management teams to develop Regional Action Plans focused on identifying and implementing turnaround strategies for at-risk legacy buildings. Concurrently, GSA is working to protect the federal government's leasehold interests. In 2010, GSA updated its Portfolio Reinvestment and Asset Repositioning Strategy focused on long-term customer needs, market location strength, financial performance, and the condition of each building. This GSA strategy provides a good model for integrating stewardship of historic properties into overall agency planning.

Within the Treasury each organization is encouraged to use information recording systems that work best for their specific needs. This decentralized approach is also embraced at BOR, where offices develop location or activity-specific plans for inventory and evaluation as needed. BOR did report that since FY 2008 it has finalized a new Directive and Standards to define internal cultural resources management requirements, reviewed and updated three policy statements (*Cultural Resources Management* (LND P01), *Museum Property Management* (LND P05), and *Museum Property Management* (LND 02-02)), and finalized a new Directive and Standard, *Operations and Maintenance of Project Works that are Historic Properties* (LND 02-03).

Because cultural resources are included in USFWS strategic planning, several reporting requirements, specifically for performance, including a Refuge Annual Performance Plan (which includes the number of historic buildings in good condition), are under the purview of a Regional Historic Preservation Officer. In FY 2010, USFWS revised and updated its 614 FW chapters 1-5 which provides policy for compliance with NHPA and coordination with NEPA and 126 USFWS chapters 1-3 which provides policy for the USFWS museum property program. New versions are expected to go into effect in FY 2012.

Several agencies reported on the staffing levels and expertise which supports stewardship requirements. FS employs approximately 350 archaeologists, historians, and other heritage specialists in permanent positions. USACE staff includes more than 150 historic preservation specialists from various disciplines and provides training in enforcement of laws related to the protection of historic properties. USFWS has 22 full-time cultural resource employees, with each region employing at least one cultural resource specialist who meets the Secretary of the Interior's Professional Qualification Standards. It routinely provides hands on training opportunities to its staff. NASA requires that Historic Preservation Officers at

each Center have training in Section 106 compliance. And BOR has 39 cultural resources management staff located in 21 offices throughout the western U.S.

Several agencies reported on specific programs and initiatives that support their respective preservation programs, including the following:

- » NPS's Cultural Resources Preservation Program which provides funds for security, environmental control, and other concerns for museum collections, and for the inventory, urgent stabilization, and preservation of historic properties.
- » Department of Homeland Security Environmental Planning and Historic Preservation Committee, which shares information and best practices among the historic preservation practitioners within DHS.
- » GSA's use of a Section 106 program alternative, the Program Comment on Select Envelope and Infrastructure Repairs and Upgrades to Historic Public Buildings, to encourage GSA project teams to pursue alternatives that minimize or avoid adverse effects on historic buildings during Recovery Act projects and beyond.
- » BLM's engagement of the public in the development of master leasing plans prior to making a commitment to lease or develop an area. This includes areas where a substantial portion of federal lands are unleased, where a moderate or higher potential for oil and gas exists, and where additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur.
- » MARAD's requirement for the number of heritage assets to be reported to the Chief Financial Officer on a quarterly basis.
- » HHS's Facility Condition Assessment, which results in information being consolidated into its Real Property Asset Management Plan.
- » The Bureau of Indian Affairs is developing a Web-based preservation plan for contributing resources within the Fort Washakie Historic District, Wyoming, on the Wind River Indian Reservation. This interactive tool assists the local facility manager to determine the appropriate methods to maintain the historic character of historic properties.

Three agencies, BLM, BOR and USACE, reported a specific correlation between the protection of historic properties and planning activities at their agency. For example, of the 60,000-plus historic properties managed by USACE, more than 75 percent are archaeological sites. Through its planning mechanisms, USACE strives to keep the location of these sites confidential in order to ensure their protection. BOR protects historic properties in its stewardship through a number of mechanisms, including public education to increase the understanding of the value and vulnerability of resources, integrating cultural resources management into management planning and design efforts, site monitoring, and sensitive design or modifications to historic buildings and structures. And BLM continues to work to increase the number of historic properties covered by proactive protection

Proactive management of historic properties through identification, protection, and use results in a working knowledge of historic properties and comprehensive inventories that support agency missions and allows the Section 106 process to be a tool in transparent federal decision making.

measures. Between FY 2007 and FY 2010, the number of protected sites increased by 10 percent.

Several agencies cited compliance with Section 106 as an example of integrating stewardship into agency planning. However, proactive management of historic properties through identification, protection, and use results in a working knowledge of historic properties and comprehensive inventories that support agency missions and allows the Section 106 process to be a tool in transparent federal decision making.

In 2011, the ACHP revised its Section 3 Advisory Guidelines to encourage federal agencies to report on compliance with EO 13514. There is a direct correlation between sustainability and preservation, evidenced by federal agencies who are integrating sustainability into their strategic plans. NPS has created the Sustainable Operations and Climate Change Branch, within the Park Facility Management Division to assist park units in implementing sustainable best practices. In 2011, a Cultural Resources Climate Change Adaptation Coordinator was hired to coordinate policy and activities surrounding adaptive management of resources ahead of climate change impacts.

BOR has structured its sustainability program to work closely with staff in the Property and Design and Construction programs to ensure integration of historic preservation planning and sustainability requirements. NASA's SSPP (required by EO 13514) encourages adaptive reuse. It has created an internal Cultural Resources Management Panel and will integrate cultural resources into its Environmental Management System. The Sustainable Policy Handbook for Facilities identifies the need to include historic preservation within an integrated design approach through all stages of project planning and delivery. BLM is advancing several projects that are models of sustainable management practices. These projects incorporate creative reuse of existing properties, energy efficiencies, and long-term, self-sustaining partnerships.

In September 2011, CEQ released its "Implementing Instruction—Sustainable Locations for Federal Facilities" in accordance with EO 13514. There are four principles for sustainable federal locations including one principle that acknowledges reuse of previously developed sites benefits communities, reduces sprawl, and reduces the need for new construction and development. This principle specifically promotes the preservation of historic resources and other existing buildings. Starting with the June 2012 SSPP update, federal agencies are required to report on how they have integrated the four principles in their SSPP.

DHS has created an executive-level sustainability working group to advance its plans for addressing sustainability and mission responsibilities, all in accordance with existing DHS policy and guidance. And GSA is meeting energy reduction goals in historic buildings by looking for opportunities throughout the building and site, creating envelope, system, and daylight management synergies, and reducing overall energy demand.

ENHANCING AND IMPROVING INVENTORIES OF HISTORIC PROPERTIES

In 2006, the ACHP found that agencies lacked accurate, comprehensive information regarding their historic property assets. However, the now mandatory data element of historic status code required for reporting to the FRPP has proven to be a successful tool for federal agencies to improve real property inventories of historic properties. While the focus of agency reporting continues on the identification of buildings and structures as real property, it is important to consider and evaluate other historic property types as agencies continue to enhance and improve the overall inventory of historic properties. These include archaeological sites, cultural landscapes, and sites of religious and cultural significance to Indian tribes.

Agencies report significant progress in establishing internal policies and directives in the identification of real property, resulting from EO 13327 and the FRPP. For example, BIA has adopted the historic status codes of the FRPP to categorize its buildings in its Facilities Management Information System. Many agencies reported continued improvement in existing policies and directives. Information provided indicates the agencies are also improving their inventories of more diverse historic property types. The majority of historic property identification reported by agencies was the result of compliance with the Section 106 process. It is important, however, for agencies to also establish procedures for proactive identification efforts under Section 110 of NHPA. Not only is Section 110 a statutory requirement, but it can assist agencies in the management of historic properties and streamline the Section 106 compliance process. The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act provides federal agencies with seven standards and associated guidelines to meet the Section 110 requirement.

Several agencies did report on improvements in the identification of historic properties. A sample of improvements in agencies identifying historic properties includes the following:

- » NASA identified a total of 259 new buildings and structures that were determined eligible for listing on the NRHP and identified 192 archaeological sites. As a result of this increased inventory, it has increased its historic property inventory by more than 100 percent.
- » BLM made significant progress with more than 2.5 million acres inventoried; an increase of more than 30 percent over the previous reporting cycle. This survey resulted in the identification of numerous historic properties, an increase of 40 percent over the previous reporting cycle.
- » MARAD evaluated 36 vessels and determined that seven were eligible for the NRHP.
- » BOR reported that by the end of FY 2010, 12,097 individual properties and 81 historic districts were inventoried (with 1,395 properties found to be

contributing to those districts) and 1,055 individual properties were assessed for eligibility to the NRHP. An estimated 1,611,862 acres were surveyed.

- » The Department of Veterans Affairs completed NRHP nominations for five individual medical centers since 2008. These include the medical centers at San Francisco, California (a Preserve America Community); American Lake, Washington; Columbia, South Carolina (a Preserve American Community); Mountain Home, Tennessee; and Hot Springs, South Dakota.
- » DOJ has completed determinations of eligibility on five facilities managed by the Federal Bureau of Prisons that were found eligible to the NRHP: Federal Prison Camp Alderson, West Virginia; USP Lewisburg, Pennsylvania; Federal Medical Center Lexington, Kentucky; Federal Correctional Camp Lompoc, California; and Medical Center for Federal Prisoners Springfield, Missouri.
- » USGS has initiated a survey to evaluate its inventory of real property for eligibility to the NRHP. This critical survey started in 2011 and by the end of 2012, it is anticipated that 13 facility evaluations will be completed.
- » A number of agencies under DHS have reported progress in their efforts to identify historic properties. The Federal Law Enforcement Training Center has met a goal to document and provide information to the general public about its historic property inventory at its Glynco, Georgia, campus. USCG is nearing completion of a survey to identify and evaluate all remaining USCG lighthouses. And CBP has set a goal to inventory one-third of all property each year until completed.

In addition to these accomplishments, a number of new initiatives were reported by agencies:

- » BOR continues to develop broad historic context studies to be used agency-wide. These context studies facilitate the evaluation of properties for eligibility to the NRHP in a cost effective manner, reducing the amount of property-specific research needed to meet documentation requirements. Between FY 2008 and 2010, the Policy and Administration Office completed and published *The Bureau of Reclamation's Civilian Conservation Corps Legacy: 1933-1942* which summarizes the history of all BOR's Civilian Conservation Corps camps.
- » As its inventory continues to age, NASA is shifting its focus from using NRHP Criterion Consideration G (a property achieving significance within the past 50 years if it is of exceptional importance) to evaluate properties, to applying the standard NRHP Criteria for Evaluation.

Many agencies reported using existing reporting requirements, such as the development of an Asset Management Plan required by EO 13327 and the Secretary of the Interior's Report to Congress on the Federal Archaeology Program, as a framework for historic property reporting. Several agencies report that they are working to use such government-wide reporting requirements for real property

and historic properties into internal reporting requirements for the identification and evaluation of historic properties. These efforts include the following:

- » BOR's Federal Preservation Officer now receiving the historic status codes assigned under the FRPP.
- » From 2008 to 2011, NASA reported implementing its "Environmental Tracking System" to centralize reporting on its cultural resources and uploaded 259 historic buildings and structures into its real property database, updating the historic status codes for reporting under EO 13327.
- » MARAD and the Federal Aviation Administration use DOT's Real Estate Management System to collect and report data in accordance with EO 13327.
- » Data gathered by NOAA's Integrated Facilities Inspection Program allows the agency to prioritize which properties should be further studied and evaluated for eligibility to the NRHP.

Many agencies provided information on the funding mechanisms for historic property inventories within their agency. For example, at BLM, the majority of inventory work was funded by land use applications and associated fees, and the work was performed by consultants for more than 700 applicants permitted by BLM. NPS Alaska Region, partnering with USFWS, received a grant from the American Battlefield Protection Program to document U.S. and Canadian World War II sites on Kiska Island within the Alaska Maritime National Wildlife Refuge. Two agencies reported the use of funds received through the Recovery Act to expand their inventories. CBP used the funding for the identification and evaluation of Land Ports of Entry. USACE reported that funds were used for Section 110 compliance projects in its Northeast, Southeast, and Western regions. In less than 18 months the following was completed by USACE using Recovery Act funding:

- » Total acres surveyed: 76,000
- » Sites identified: 929
- » Site revisited: 601
- » Sites tested for NRHP eligibility: 42
- » Sites considered eligible for NRHP listing: 453
- » Sites considered not to be eligible: 428
- » Sites requiring further evaluation: 48

Numerous challenges were reported by agencies in the identification of historic properties. Limited agency budgets and competing missions were the most cited reasons for incomplete inventories of historic properties. Those agencies with preservation mandates as part of their mission (e.g. NPS, BLM) found it easier to budget for historic property identification than those agencies whose missions were not preservation driven, such as BOR and DHS. Still, even those agencies with preservation mandates frequently report that budgets are insufficient for the management of their massive property holdings, and the use of funds for historic property studies and evaluations are often minimal.

CASE STUDY

Closure of Fort Monroe, Virginia and Creation of a New National Monument

ENTITY

National Park Service and the Fort Monroe Authority

LOCATION

Hampton, Virginia



CREDIT: FORT MONROE AUTHORITY

Fort Monroe, Virginia

President Barack Obama created the Fort Monroe National Monument in November 2011, by exercising his authority under the Antiquities Act. There are currently 21 national park units located in Virginia; Fort Monroe is the 22nd and the 396th nationwide. This new national monument is comprised of 325 acres.

In 1609 after the founding of Jamestown, Virginia, settlers built a fortification called Point Comfort which later became Fort Monroe at the confluence of the James River and the Atlantic Ocean. The first enslaved Africans were brought to this geographic location in 1619 which was the beginning of slavery in North America. During the Civil War, after General Benjamin F. Butler declared any runaway slave “contraband of war,” Fort Monroe became the recipient of the first freed fugitive slaves. This action by General Butler, instrumental in the formulation and execution of the Emancipation Proclamation by President Abraham Lincoln, signaled the end of slavery in the U.S. These important events in U.S. history along with the intact nature

of the buildings and landscape of Fort Monroe, under the careful stewardship of the Department of the Army, were the foundation for the designation of this new national monument.

Encompassing approximately 570 acres, Fort Monroe, including the last moat-encircled active Army installation, the Old Point Comfort Lighthouse, the former Chamberlin Hotel, and 189 other historic properties, was recognized as a historic “crown jewel” in the Army inventory. When the decision was made to close Fort Monroe as an active Army installation under the Base Realignment and Closure Act of 2005, many local and national groups with interests ranging from history to natural resources and proponents for the fort’s future use participated in the Section 106 process. The transfer to the Commonwealth of Virginia was completed in September 2011, and is currently controlled by the Fort Monroe Authority on behalf of the Commonwealth. The Army will continue to operate the Casement Museum located at Fort Monroe.

A grass roots effort in favor of a national monument designation began at the local level several years ago. Local and state governments and nonprofit organizations worked together with the National Trust for Historic Preservation to request a National Park Service presence at Fort Monroe. According to Secretary of the Interior Ken Salazar “President Obama has ensured that this historic fort, a symbol of the long struggle for freedom for African Americans, will be preserved as a national park for generations to come.”

The FMA Reuse Plan estimates that Fort Monroe will be an incubator of 3,000 jobs. With NPS involvement it is estimated for every dollar invested, four additional dollars will be generated. This infusion of new jobs in the Commonwealth as well as the investment represented by a NPS presence represents how an important historic and natural asset can contribute to a local and regional economy.

SUMMARY

The 2011 progress reports received by the ACHP on federal agency efforts to identify, protect, and use historic properties continue to show improvement and are demonstrative of the concerted efforts many agencies are making to manage properties in accordance with the goals of NHPA and EO 13287. While many challenges remain and new opportunities are emerging, the ACHP notes significant progress in the development of public-private and federal partnerships and the inclusion of non-federal stakeholders in the consideration of these stewardship issues.



CREDIT: FS

Chimney Rock is a San Juan National Forest Archaeological Area located in Colorado between Durango and Pagosa Springs. The 118 prehistoric sites within the area were created by the people of the Chacoan culture, ancestors of contemporary southwestern Puebloan people. The Chimney Rock Interpretive Association was designated a Preserve America Steward in 2009.

CHAPTER 4: FINDINGS AND RECOMMENDATIONS

THIS CHAPTER CONTAINS THE ACHP'S FINDINGS regarding the current state of federal historic property management and recommendations for improvements to be implemented over the next three years. While the primary basis for these conclusions is the 2011 progress reports submitted by federal agencies, the ACHP has been informed by its extensive interaction with federal agencies and preservation partners in day to day activities. In addition to the information federal agencies provided on the identification, protection, and use of historic properties, the ACHP is aware of a number of issues in the management of historic properties that will require new strategies for their effective stewardship that were not directly reported by federal agencies. It is clear that these issues have had, and will continue to have, a broad effect on property managing agencies in the coming years.

The 2011 progress reports reaffirmed that federal real property portfolios include a broad and diverse range of historic properties that can only be effectively managed with a similarly diverse set of management protocols, procedures, and other tools. Agencies have acknowledged that strategies for the management of one property type or even one very specific property may not be applicable to others, and the original uses of historic properties, especially those of a scientific

nature, produce obstacles in adapting them to current needs. While most agencies have tools and procedures at their disposal that are sufficiently diverse to prepare them for most anticipated management challenges, many agencies continue to be presented with obstacles that cannot be effectively addressed by current business models or standard federal practices. The ACHP will continue encouraging federal agencies to review their policies and procedures for the identification, protection, and use of historic properties to ensure they are adequate to respond to evolving and emerging preservation and management issues.

While many agencies are improving the management and condition of their historic property inventory, others continue to approach historic preservation as a collateral responsibility, separate from and not adequately integrated into strategic plans for meeting core missions. Along with ongoing efforts to ensure federal real properties are mission critical, sustainable, and energy efficient, the federal government should strive to further develop a stewardship ethic that recognizes the preservation, enhancement, and productive use of agency historic properties as sustainable.

The 2011 progress reports continue to demonstrate that historic preservation initiatives that involve partnerships with non-federal entities can bring significant social and economic benefit to both agencies and local communities. While many agencies have more fully embraced partnerships with state, tribal, and local communities and the private sector, there is ample opportunity to expand these partnerships, and there remains a demonstrated desire by local communities to engage further in heritage tourism and local economic development initiatives with federal agencies. Awareness of and appreciation for the value of priceless resources under federal ownership will foster better management practices that will benefit these agencies, the American people, and the historic properties themselves.

The following findings and recommendations demonstrate priorities the ACHP will address to further improve the federal preservation program and respond to emerging issues in the management of historic properties for the next agency reporting cycle in 2014.

FINDING NO. 1: ECONOMIC DEVELOPMENT AND JOB CREATION

While federal agencies and the historic properties under their ownership or control have great potential to contribute to local economic development through job creation, public-private partnerships, property management practices, and participation in local and regional heritage tourism initiatives, they have not systematically done so.

As found in 2009, many federal agencies have made efforts to develop public-private partnerships that support the protection and use of historic properties. However, few indicate that these efforts are guided by policies or strategic goals that support broader preservation goals in their agency. In addition, few agencies

The investment of federal resources in partnerships with local communities to identify, protect, and use historic properties can often spur economic development in gateway communities, urban environments, and inner cities where a strong federal presence has traditionally supported communities in the past.

were able to calculate or otherwise determine the local or regional economic impact of public-private partnerships, visitation related to heritage tourism at federally owned historic properties or nearby non-federal sites, effects on local tourism tax revenues, community property values, or the impact on related service industries or job creation. Recent studies on the economic impacts of Civil War battlefield preservation, National Wildlife Refuge visitor programs, and parks and open space have also indicated important contributions to local economies. However, these initiatives directly correlate with agencies whose missions include protection and enhancement of historic resources and visitation and use by the public, most notably NPS, BLM, FS, and USFWS. A number of agencies have found creative ways to promote heritage education and tourism programs, despite the lack of obvious connection with their principal missions. In particular, agencies like NOAA and NASA have advanced educational experiences that draw visitors to their facilities and help support the local economy. DOE also has done this to some extent within the limits of their security and mission needs, most actively through museums outside facility boundaries.

The investment of federal resources in partnerships with local communities to identify, protect, and use historic properties can often spur economic development in gateway communities, urban environments, and inner cities where a strong federal presence has traditionally supported communities in the past. Often agencies that have determined a need to reduce their property holdings in such areas fail to consider the benefits of retaining assets that might be good candidates for public-private partnerships or cooperative heritage tourism programs. With the exception of GSA, which has prepared its own disposal guidance, most agencies have not developed protocols for considering the value of reusing historic properties for these purposes as part of the disposal process.

Recommendations

- » The ACHP should collaborate with federal agencies and relevant private sector organizations to provide federal agencies with more information, guidance, and models on the economic value of federal historic property stewardship, including the potential contributions of federal historic properties to local economic development. The ACHP should integrate any guidance provided into future Section 3 advisory guidelines for agency use.
- » Federal agencies should employ standard methods and the systemic collection of data based on a uniform set of metrics for measuring the direct and indirect economic impacts of historic preservation (including heritage tourism) at the state, regional, and local levels that can be applied nationally. The DOC should take the lead to advance this effort, collaborating with the ACHP, individual federal agencies, state and local government, and private sector entities (including academic institutions) that have previously supported work in this area.

FINDING NO. 2: SUSTAINABILITY

Agencies would benefit from guidance on the advantages of retaining and converting historic buildings and structures into sustainable properties that meet the goals of the Energy Independence Security Act of 2007 and EO 13514, as well as guidance on promoting the development of a sustainable federal infrastructure that recognizes the economic and environmental value of retaining historic properties.

Congress and the Administration continue to advocate for a federal government and workforce that reduces energy consumption and increases energy efficiency. In 2009, President Obama issued EO 13514 specifically targeting the reduction of greenhouse gas emissions, energy intensity in buildings, and use of fossil fuels and the increase in use of renewable energies by the federal government. This EO, along with several initiatives pending before Congress, has focused significant attention on agency efforts to decrease energy consumption.

As noted in 2009, agencies faced with meeting these standards must assess the energy efficiency and performance of current property holdings to determine whether existing infrastructure meets the goals established by EISA or whether buildings would be considered under-performers in need of retrofitting, rehabilitation, or disposal. EO 13514 has reinforced this requirement through the mandate for agency SSPPs. Many agencies still lack a clear awareness of sustainability benefits of historic buildings. As a result of this misconception regarding the retention value and energy efficiency potential of older buildings, some agencies continue to pursue disposal of older, underperforming buildings to make way for new inventory. The perceived higher cost of retrofitting or converting older buildings into energy efficient buildings that meet goals established by EISA and EO 13514 may also serve as a deterrent for retaining these buildings.

However, historic buildings and facilities in federal ownership were often constructed to high standards in part due to the availability of high quality materials, access to local craftsmen, and relatively low cost of skilled labor in the past. They were also typically constructed to be responsive to local climates. Frequently the higher quality construction materials used in their construction support modern energy efficiency goals and relatively long life cycle use.

Agencies should consider the strong reinvestment potential in historic buildings and structures, which are often built to better standards and, once renovated, are strong performers. Agencies should also factor in the inherent energy already imbedded in these buildings and the potential environmental cost of disposing of these materials. With limited federal budgets, agencies will need to rely on both new construction and rehabilitation of existing historic properties in order to meet the mandates of EISA and EO 13514.

CEQ in its “Implementing Instructions—Sustainable Locations for Federal Facilities,” developed and released in accordance with EO 13514, has outlined four principles for agencies to integrate into their annual SSPP update starting in June 2012. One of the four principles encourages agencies to maximize the use of existing resources,

specifically promoting the preservation of historic resources and other existing assets. In light of these new principles, it is likely that federal agency strategic plans developed in the coming years will reflect an increased emphasis on adaptive reuse of existing assets, rather than new construction. The ACHP will consider updating the Section 3 advisory guidelines for future reporting to explore how federal agencies integrate the sustainable federal locations principles into the SSPPs.

Agencies are increasingly turning to the standards developed by the U.S. Green Building Council for guidance on energy performance improvements. To date, LEED has primarily focused on new construction; LEED metrics that value and measure embodied energy life cycle and durability of historic buildings, materials, and systems have been unavailable. However, in 2010, the USGBC initiated an effort to update the LEED rating system, and the ACHP encouraged federal agencies to follow its lead and provide comments on the draft's implications for the preservation of historic properties. Since many federal agencies are utilizing the LEED rating system, the proposed revisions will have direct impacts on agency stewardship of historic buildings. It is expected that this effort will be completed in 2012.

In addition, in 2011, the ACHP prepared guidance to advise federal decision makers regarding the requirements of Section 2(g) of EO 13514. The ACHP developed the guidance to assist federal agencies in their efforts to meet the expectations of the EO while also meeting the requirements of NHPA. The goal of the guidance is to assist federal decision makers, usually capital asset managers, facility managers, and other program and project managers in their considerations regarding sustainability and historic federal buildings. The decision makers will benefit from the ACHP's recommended strategies to consider historic preservation along with energy efficiency and sustainability concerns, to seek out historic preservation outcomes, and to take advantage of opportunities for meeting historic preservation and energy efficiency and sustainability goals together in the administration of federal buildings.

It is clear from the 2011 progress reports and other interactions with federal real property managing agencies, however, that little internal guidance is available within federal agencies on how to transform the existing infrastructure into a greener and energy efficient one while recognizing the environmental benefit of retaining historic properties in the process.

Agencies have demonstrated that many of their historic buildings and structures are built to high structural standards and have correspondingly long expected life cycles, and that they can easily become better energy performers through the application of new technologies that improve usability and energy efficiency without routinely requiring the replacement of historic fabric. While these technologies are widely known and applied in the private sector, many federal agencies have not developed or provided guidance to their facility managers on the application of these standards to historic buildings, and often do not provide funding for the upfront investment required to convert these into better performers and provide a return on this initial investment over the long term.

While usability and energy efficiency technologies are widely known and applied in the private sector, many federal agencies often do not provide funding for the upfront investment required to convert existing assets into better energy performers.

Recommendations

- » CEQ's Steering Committee on Federal Sustainability (established in accordance with EO 13514) should collaborate with the ACHP to provide guidance on the benefits of adapting historic properties to meet sustainability goals and considering potential effects to historic properties related to disposal.
- » GSA's Green Buildings Advisory Committee (established in accordance with EISA) should collaborate with the ACHP to provide guidance on the benefits of adapting historic properties to meet sustainability goals and considering potential effects to historic properties related to disposal.
- » The ACHP and NPS should continue to advocate for acknowledgement of the durability of historic buildings, materials, and systems in order to provide needed encouragement for the reuse of historic properties during USGBC's LEED update process.
- » Agency SRPOs, SPOs, and SSOs (required by EO 13514) should meet to discuss procedures to ensure that buildings and structures being considered for rehabilitation or disposal to meet energy efficiency and sustainability goals are subject to a complete evaluation, taking their historic significance into account. The ACHP will work with DOI, OMB, and the RPAC to coordinate such a meeting. Any findings or recommendations resulting from this meeting will be shared with SPOs, SRPOs, SSOs, the public, and the private sector.

FINDING NO. 3: RENEWABLE ENERGY

Renewable energy initiatives present the opportunities for the preservation community to think creatively about resource stewardship and management in the current economic climate but also have the potential to significantly impact historic properties.

The ACHP is actively addressing the implications of renewable energy development and transmission on historic properties through a variety of groups and interagency forums. The ACHP is participating in a number of Administration initiatives, including CEQ's Rapid Response Teams on Renewable Energy, Energy Transmission, Transportation, and Priority Infrastructure Projects resulting from the August 2011 Presidential Memorandum, the Bureau of Ocean Energy Management's Smart from the Start Initiative, and the development of a Memorandum of Understanding regarding offshore wind development in the Great Lakes, as well as on- and off-shore wind energy development forums to ensure federal planning properly addresses preservation interests.

The Western Renewable Energy and Historic Preservation Workgroup, jointly established in 2009 by the ACHP and DOI, through BLM, is addressing issues of cultural resource protection that are emerging in large-scale energy development and transmission projects proposed on BLM lands in the western U.S. While these projects are being managed through the regular Section 106 process, the workgroup reviews progress, addresses common issues that emerge from the

individual reviews, identifies topics where additional education and awareness would benefit stakeholders, and compiles “lessons learned” to guide future energy development projects in the western U.S. and elsewhere. These may include approaches to resource identification, avoidance and mitigation, and consultation with stakeholders.

In response to the heightened interest in renewable energy issues, the ACHP launched a dedicated subpage on the ACHP’s Web site focused on renewable energy development, including information, tools, guidance, and contacts. In addition, in January 2011 the ACHP and the National Association of Tribal Historic Preservation Officers, in cooperation with NPS, convened a Tribal Summit on Renewable Energy in Palm Springs, California. The Summit provided an unprecedented opportunity for tribal leaders and federal officials to address the broad implications of renewable energy development and transmission on historic properties and also underscored the importance of focusing on the impact on historic properties of a number of renewable energy projects slated for development by BLM. These impacts are being addressed through the WREHPWG.

Tribal Summit participants also encouraged the ACHP and NPS to address long standing issues related to the treatment of large traditional cultural landscapes through the Section 106 process. Recognizing the potential for renewable energy development and federal development of all kinds to continue impacting landscape level resources, the ACHP co-sponsored a forum along with NPS on traditional cultural landscapes in Seattle, Washington, in August 2011. In response to this forum, the ACHP has developed a Native American Traditional Cultural Landscapes Action Plan, which was adopted by the ACHP membership at its November 2011 business meeting.

Recommendations

- » Federal agencies should continue to identify opportunities for efficiencies and streamlining to complete the Section 106 compliance process for renewable energy projects. In order to ensure that federal planning for renewable energy development successfully incorporates historic preservation requirements early in project planning, the Administration and individual agencies should engage the ACHP and other agency preservation resources in interagency environmental streamlining and stewardship initiatives on renewable energy, such as the Renewable Energy Rapid Response Teams, Priority Infrastructure Projects, and on- and off-shore wind initiatives.
- » The ACHP and NPS should collaborate with development agencies and stakeholders to address longstanding issues related to the treatment of large traditional cultural landscapes through the Section 106 process.
- » NPS should continue its commitment to revise Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties, and collaborate with the ACHP to ensure the revised guidance is responsive to the

challenges presented to the protection of historic properties by renewable energy development.

FINDING NO. 4: FEDERAL REAL PROPERTY REALIGNMENT

Agencies face a significant challenge in the realignment of real property portfolios, balancing stewardship responsibilities and mission needs.

Congress and the Obama Administration have continued to advance initiatives that would mandate federal agencies to reduce their property holdings to only those essential to meet agency missions. In June 2010, President Obama issued a memorandum for the disposal of unneeded federal real estate with a target of \$3 billion in cost savings by the end FY 2012. As part of the FY 2012 budget, a legislative proposal (known as CPRA) was introduced, and OMB has established an RPAC to identify strategies for minimizing waste and the efficient disposal of federal real property.

Many federal agencies that have identified non-essential or “under-performing” property are confronted by the prospect of disposing of large numbers of buildings, facilities, and structures no longer critical to agency missions. Many of these properties are heritage assets and historic properties. Excess acreage may also contain archaeological sites, cultural landscapes, or other properties of religious or cultural significance. The disposal of federal properties presents unique challenges to agencies who must balance budgetary and management priorities, identify mission-critical assets, and determine how non-critical assets can be removed from ongoing management. Agencies report that many methods of disposal (donation, sale, transfer to other federal, state, tribal, or private entities, leasing, and demolition) are all utilized on a case-by-case basis to reduce unneeded property holdings. For most agencies, however, this reduction process is not influenced by the properties’ historic significance or potential for reuse based upon its unique characteristics as a historic property. As a result, agencies often dispose of properties absent any strategic policy that recognizes the historic value of some properties for retention or reuse.

Many agencies face mandates to reduce property holdings as part of a “footprint” or inventory reduction. However, the historic value of a property or its suitability for reuse is only considered after disposal decisions have already been made. Few agencies have strategic plans that encourage consideration of these values prior to a disposal decision and in decision making. Although traditionally excess properties are buildings and structures, in many instances historic districts, cultural landscapes, archaeological sites, traditional cultural properties, and even ships are included among these “at risk” historic properties. Following years of deferred maintenance and neglect, agencies may conclude that the cost of repair, rehabilitation, or retrofitting is financially prohibitive. As a result, demolition or site clearance is often considered the best alternative for agencies to redevelop or transfer cleared parcels free of restrictions.

Typically located in town or city centers and near other important properties, prominent public buildings in federal ownership, including monumental buildings such as courthouses, custom houses, and agency headquarters, remain profoundly important symbols of federal stewardship and community pride.

Several agencies, including DHS and NASA, report significant restrictions on the use of public-private partnerships or leases for alternate uses for non-mission critical property due to security issues and concerns. For many agencies, excess property may be located within secure perimeters or is adjacent to other federal property that must remain in governmental control and secure from outside threat. In these circumstances, alternative uses for properties subject to abandonment and/or disposal are severely limited. Agencies also report challenges adapting highly technical or scientific facilities for reuse. And properties that were classified as “temporary” when they were constructed (and were therefore often built to lower standards) are often considered less desirable for long-term reuse by public or private partners. Similarly, ubiquitous property types or designs within agencies may be targeted for abandonment or disposal and present reuse challenges for partners who may have limited interest or ability to reuse multiple, similar properties.

It is clear that agencies with comprehensive historic property surveys of their real property holdings are able to more effectively manage their inventories. Yet many agencies continue to report that, despite incremental progress in identifying historic properties, they continue to lack a comprehensive understanding of their inventory, and historic significance has typically not been fully evaluated. Agencies report ongoing financial and administrative challenges in managing underutilized or non-mission critical properties, including a shortage of funding to conduct identification and evaluation efforts for these properties, and insufficient qualified personnel to perform the work. These challenges are increasing as agencies’ inventories continue to age and must be identified and evaluated for eligibility to the NRHP. Most agencies report insufficient allocation of resources to conduct inventories outside the Section 106 process. As a result, many agencies depend solely on the identification efforts conducted through the Section 106 compliance process. This reactive approach limits an agency’s ability to comprehensively understand their resources and establish an effective management strategy for their stewardship.

Section 111 of NHPA allows agencies to reinvest lease proceeds for historic preservation activities involving the subject property or other historic buildings. However, few agencies’ legal offices recognize the authority of Section 111 or consider it sufficient legal authorization within their establishing legislation, mission, and performance measures. By using Section 111 authority, agencies have the opportunity to access a new revenue source and fund projects that may not have previously been considered a funding priority.

Section 412 of the General Provisions Consolidated Appropriations Act allows GSA to create outlease-leaseback relationships with private companies that provide the capital to preserve and upgrade important historic buildings. However, budget scoring rules, developed jointly by OMB, the Congressional Budget Office, and the House and Senate Budget Committees require the government’s cost for the entire lease term to be financed up front in the first year of the lease. This treatment has limited GSA’s ability to use private financing to leverage the equity value of government assets. Greater flexibility with the application of budget scoring rules to outlease/leaseback transactions made pursuant to Section

412 leases would facilitate GSA's ability to keep these important federal public buildings occupied and viable.

Federal agencies that own iconic historic buildings report they have experienced limitations in their ability to fund the repair and alteration necessary to ensure these buildings remain occupied and viable. Often considered to be the most recognizable and prominent public buildings in federal ownership, these structures include monumental buildings such as GSA-owned courthouses, custom houses, and agency headquarters, as well as other federally owned administrative buildings, post offices, residences, and health care facilities, most of which were constructed to high architectural standards and with widely recognizable artisanship. Typically located in town or city centers and near other important properties, these buildings remain profoundly important symbols of federal stewardship and community pride.

It is the clear goal of Congress and the Administration to reduce the role of the federal government as “property manager,” particularly when maintaining properties with no mission critical requirement. This goal is reasonable; however, the federal government is steward of diverse properties that represent America's tangible and intangible history. This trust responsibility, on behalf of the American public, must be taken seriously, and agencies should seek ways to meet disposal goals while protecting irreplaceable assets. By fully implementing legal authorities, like Section 111 and Section 412, federal agencies can maintain historic properties without federal appropriations, making them financially self-sufficient.

Recommendations

- » OMB, in consultation with GSA, the ACHP, and other affected agencies, should re-examine the application of Section 412 scoring rules as applied to historic buildings and pursue changes to facilitate the outlease of important federal historic buildings.
- » The ACHP, GSA, and NPS should collaborate to encourage federal agencies to use existing federal leasing and reuse authorities, including Section 111 and Section 412, to promote the use of federal historic properties to promote economic development.
- » The FRPC should extend observer status to the ACHP so that the two organizations may collaborate on the development of agency disposal plans that recognize the value and potential reuse of historic properties in their portfolios.
- » The ACHP and OMB's RPAC should work together to provide guidance on potential effects to historic properties to the RPAC.
- » The ACHP should advise Congress and the Administration on the implications of CPRA on historic properties and encourage proper integration of historic preservation considerations and values.

FINDING NO. 5: FEDERAL AGENCY PRESERVATION PROGRAMS IN THE 21ST CENTURY

Agency strategic plans, which are prepared by senior policymakers to assist in fulfilling the agency's mission, still frequently do not address historic property management needs or establish goals for improvement at the appropriate level. As a result, many agencies find it difficult to identify adequate resources to effectively resolve conflicts between NHPA and other statutory requirements.

The ACHP noted in 2009 that historic preservation rarely rises to the level of inclusion in an agency strategic plan; yet doing so would improve the ability of real property management agencies to manage historic properties as assets, rather than confront them as obstacles to implementing other mission priority programs and projects. The Section 3 progress reports continue to indicate that agencies are incorporating historic preservation management responsibilities required by Section 110 into strategic plans at the individual program or sub unit level; however, many agencies still do not tie these to broader property management goals nor do they develop performance measures and measure whether progress has been made at the headquarters level. The absence of historic preservation components in agency- or bureau-wide property management plans that would provide direction on the identification, protection, and use of historic properties continues to relegate the stewardship of these properties to a lower status and hinder cultural resource management staff from achieving the goals of this EO.

While there has been steady improvement in agencies reporting on the identification, protection, and use of historic properties within their inventories, the information remains incomplete as agencies improve various reporting systems and find ways to fully meet their Section 110 responsibilities. With the exception of those reports submitted by agencies with large land holdings, most agency reports do not consistently address archaeological sites, cultural landscapes, and properties of religious and cultural significance to Indian tribes.

Several agencies reported using Section 106 as the primary means to protect historic properties. While avoidance of adverse effects to historic properties is a protection measure, Section 106 is often initiated too late in the decision making process, when avoidance is no longer viable. Because agencies must comply with numerous environmental laws and regulations, it is important that they develop a compliance strategy that gives equal weight to all statutory considerations. The regulations implementing Section 106 of NHPA provide a planning process that is intended to be a venue to discuss alternatives to avoid, minimize, or mitigate potential effects with identified stakeholders. But in order for this process to be most effective, Section 106 must be initiated early in the project planning process. When used effectively Section 106 can be a powerful tool to federal agencies in making sound decisions regarding real property management.

Consistent with the requirements of EO 13563, "Improving Regulation and Regulatory Review," and the Administration's push for a more streamlined federal review process, the ACHP completed its review of the regulations implementing Section 106. Based on its analysis and public comments received, the ACHP

adopted a plan for completing this and future reviews in August 2011. The ACHP finds that the current Section 106 regulations are not outmoded, ineffective, insufficient, or excessively burdensome, and therefore should not be modified, streamlined, expanded, or repealed. However, in the interest of the ACHP and the public to seek continuous improvements to the Section 106 regulatory process, and consistent with the ACHP's 2011 Strategic Plan, the ACHP has committed to issue guidance and provide education, training, and outreach to support the effective participation of consulting parties and the public in the Section 106 process and to promote the effective consideration of historic preservation requirements in federal planning. This includes using the Section 3 progress reports as a mechanism to gather data from federal agencies and periodically report on the adequacy and effectiveness of their preservation programs in carrying out the requirements of Section 106.

EO 13287 calls for the designation and active participation of SPOs in the development of historic preservation management procedures that will advance the goals of this EO in each agency. Typically these officials serve as an assistant secretary or deputy assistant secretary who assists in the development of agency budgets. Their incorporation into the preservation planning process is designed to ensure that agencies establish effective plans and priorities for meeting these goals and that agency budgets support the achievement of these plans. It has become clear to the ACHP, however, that some agencies have reassigned SPO designation to officials who do not meet the requirements of the EO and who lack sufficient planning and budgetary authority to adequately influence or address systemic historic preservation issues at the policy level.

In order to maximize the effectiveness of SPOs, designation of an SPO at the assistant secretary or deputy assistant secretary level or its bureau level to coincide with the SRPO and SSO designations could help ensure that consideration is given to the development of agency-wide strategic plans for the effective management of historic properties.

The ACHP notes that several federal agencies with significant inventories of historic properties did not submit progress reports as required by the EO, or submitted well after the September 30 deadline. The EO serves to encourage agencies to manage their historic properties consistent with the requirements of NHPA and furthers the Administration's goals of efficient management and use of federal resources and sustainable infrastructure. Effective compliance with the EO and pursuit of its goals can help advance important Administration policies and initiatives.

Recommendations

- » All real property managing agencies should designate an SPO that meets the standards of Section 3(e) of EO 13287. The ACHP should continue to encourage and assist agencies in meeting this requirement.

It is the clear goal of Congress and the Administration to reduce the role of the federal government as “property manager,” particularly when maintaining properties with no mission critical requirement.

- » All federal agencies should designate an FPO in accordance with Section 110(c), and in support of Section 3(e) of EO 13287. The ACHP and NPS should continue to encourage and assist agencies in meeting this requirement.
- » The ACHP and CEQ should complete guidance on the coordination of reviews under Section 106 and NEPA consistent with Section 800.8 of the ACHP's regulations.
- » Consistent with the goals of the ACHP 2011 Strategic Plan and EO 13563, the ACHP should continue to develop and implement performance measures to assess the overall effectiveness and efficiency of the Section 106 process and to survey practitioners' experience in complying with the requirements of the regulations.
- » NPS should review and revise as necessary the Secretary of the Interior's Standards for the Treatment of Historic Properties, and collaborate with the ACHP to ensure that the revised guidance is responsive to the challenges of protecting historic properties.
- » The Administration should reaffirm the purpose and intent of EO 13287 and encourage federal agencies with real property responsibilities to submit the required progress reports to the ACHP and the Secretary of the Interior.

SUMMARY

Federal agencies are encouraged to support the ACHP in meeting these recommendations as they examine their preservation programs to determine how they can improve their stewardship of historic properties and productively use their historic property inventories. Few agencies reported on the establishment of specific, measurable goals for improving their efforts to identify, protect, and use historic properties. Agencies are encouraged to devise such plans and use these metrics to report on their progress in addressing these challenges and implementing these recommendations in 2014, the next reporting cycle.



CREDIT: SAVE OUR HISTORY / HISTORY®

Students from Philadelphia, Pennsylvania, take part in an archaeological dig as part of their Save Our History project on the grounds of a former Underground Railroad stop at what is now the historic Johnson House site.

CHAPTER 5: TOWARD A COMMON GOAL

EO 13287 REQUIRES THAT EACH AGENCY with real property management responsibilities develop triennial reports on its progress in identifying, protecting, and using historic properties in its ownership and make the report available to the ACHP and the Secretary of the Interior. These progress reports are vital to the improvement of federal historic property management. They assist the ACHP and the Administration in measuring the progress and commitment by agencies in achieving the goals of this EO by supporting the ACHP's ability to report triennially on the state of the federal government's historic properties and their contribution to local economic development.

The 2011 Section 3 progress reports represent the fourth round of reporting by federal agencies under EO 13287 and continue to demonstrate a clear commitment to improve the stewardship of historic properties. Agency reports provide information on historic property inventories in accordance with the goals of NHPA and EO 13287, and demonstrate the commitment to integrate principles of sustainability into property management consistent with current Administration initiatives. While many challenges remain and new challenges emerge, the ACHP notes significant progress in the development of public-private partnerships and the inclusion of non-federal stakeholders in the consideration of stewardship issues.

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

than ever before. Due to the passage of time, many historic properties, like those associated with the terrorists attacks of September 11, 2001, are significant as a result of modern events that have become embedded in the country's collective memory. This evolution of significance requires agencies to think broadly when evaluating properties and identifying stakeholders. The launch of AGO and the Department of the Interior's American Latino Heritage Initiative are just the start of such a wave to capture and maintain, for future generations, the knowledge of a shared story that is as important today as it was yesterday.

The ACHP is committed to carrying out the identified recommendations of this report and working closely with other agencies that share a common commitment to this process over the next three years. The Federal Property Management Section of the ACHP's Office of Federal Agency Programs continues to work closely with federal property managers in meeting and improving their responsibilities under Sections 106 and 110 of NHPA. FPMS is integral to advancing the goals of this EO and providing assistance to stakeholders in meeting identified challenges. In Fiscal Years 2012 through 2014, the ACHP will continue to partner with property managing agencies, SPOs, FPOs, and agency leadership to identify opportunities for affording greater protection to historic properties under federal control. It will also seek new partnerships to support Administration initiatives that will advance the federal government's identification, protection, and use of historic properties while meeting the goal of a clean energy economy and fiscal responsibility.

The launch of America's Great Outdoors and the Department of the Interior's American Latino Heritage Initiative are just the start of such a wave to capture and maintain, for future generations, the knowledge of a shared story that is as important today as it was yesterday.

The issuance of EO 13287 has proven to be a useful tool for identifying the status of federal historic property management and the progress federal agencies have made in the management of real property. The first ACHP Report to the President represented a milestone in federal stewardship and provided the first opportunity for agencies to examine their own achievements and receive independent evaluation from the ACHP on these efforts. This third triennial report has demonstrated that federal property managers are using EO 13287 to strengthen their preservation programs and challenge their own leadership to meet these goals. The ACHP anticipates that the recommendations within this report, once implemented, will improve the efficiency and effectiveness of agency efforts to continue improving their stewardship of heritage assets and create a sustainable and efficient inventory.

There is no doubt the federal government faces unprecedented challenges in the next three years as it endeavors to reduce the size of its real property inventory, transform its remaining buildings into green, energy efficient assets, and utilize these assets to promote economic development and revitalization to the economy on a national, state, and local level. The retention of historic properties as energy efficient and strong performing assets can contribute to each of these goals and, in so doing, promote economic development and enhance community pride. The ACHP will continue to work with agencies to fulfill these goals and meet its own mission to promote the preservation, enhancement, and sustainable use of the nation's diverse historic resources, and advise the President and Congress on national historic preservation policy. These federal assets are American assets, and they are vital to maintaining a sense of history, belonging, and identity to all Americans.

CASE STUDY

Preservation Green Lab: A Nonprofit's Contribution to Sustainable Development

ENTITY

National Trust for Historic Preservation

LOCATION

Nationwide



Warehouse Historic District, Cleveland, Ohio

CREDIT: NATIONAL TRUST FOR HISTORIC PRESERVATION

The National Trust for Historic Preservation plays a vital role in the preservation of the nation's historic places. A private, nonprofit membership organization dedicated to saving historic places to enrich America's future, the NTHP advocates for preservation at the federal level and supports grassroots preservation nationwide. The NTHP's Sustainability Program promotes the reuse and retrofit of existing buildings and reinvestment in communities through policy, research, and outreach. In March 2009, it launched the Preservation Green Lab, a think tank focused on sustainability and historic preservation, in Seattle, Washington, with the mission to further the scientific understanding of the value of the existing U.S. building stock. The PGL also develops and promotes strategic policies for integrating the reuse and retrofit of existing and historic buildings into government efforts to achieve sustainability objectives.

Recognizing that more than 40 percent of the nation's carbon emissions come from the construction and operation of buildings,

one of the PGL's forthcoming studies illustrates that reusing and improving the efficiency of existing and historic buildings is an essential part of a clean energy economy. This study, entitled "The Greenest Building: Quantifying the Environmental Value of Building Reuse," compares the environmental impacts of demolition and new construction to building reuse using Life Cycle Assessment. Life Cycle Assessment is an internationally recognized approach that evaluates the potential environmental and human health impacts associated with products and services throughout their life cycle. Specifically, the study aims to compute and compare the life cycle environmental impacts of buildings undergoing rehabilitation to those generated by the demolition of existing buildings and their replacement with new construction; determine which stage of a building's life (i.e. materials production, construction, occupancy) contributes most significantly to its environmental impacts, when those impacts occur, and what drives those impacts; and assess the influence of building typology, geography, energy

performance, electricity-grid mix, and life span on environmental impacts throughout a building's life cycle.

This study assesses primary scientific life cycle impact data from six different building typologies (single family, multifamily, commercial, mixed-use, warehouse, and an elementary school) in four climate zones of the U.S. to address human health, ecosystem quality, climate change, resources, and water impacts. Preliminary results indicate that reuse is almost always more environmentally friendly than new construction, assuming comparable energy performance. Further, the PGL study shows new high performance buildings rarely "catch up" with retrofitted existing or historic buildings.

Many federal agencies have adopted sustainability goals and standards, issued by organizations including the U.S. Green Building Council and the American Society of Heating, Refrigerating, and Air Conditioning Engineers, which have affected historic buildings and structures.

Given PGL's forthcoming groundbreaking scientific study quantifying the value of building reuse, as well as additional studies on green policies and best practices, the NTHP's study will become a valuable resource for federal agencies striving to meet sustainability goals with underutilized existing and historic buildings.

Just as the ACHP advocated in its own private industry partnership publication

with Booz Allen, *Assessing Energy Conservation Benefits of Historic Preservation: Methods and Examples* (1979), "The Greenest Building: Quantifying the Environmental Value of Building Reuse," will provide a greater understanding of the potential environmental value associated with reuse and retrofitting existing and historic buildings. The study is expected to provide a valuable tool for federal decision makers to achieve sustainability

goals for historic buildings in their inventories that were previously considered underperforming. Improving the efficiency of existing and historic buildings should become a critical element of every agency's capital improvement plan, and a principal part of a sustainable federal future.

APPENDIX A: EXECUTIVE ORDER 13287, PRESERVE AMERICA

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

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

SEC. 2. BUILDING PRESERVATION PARTNERSHIPS. When carrying out its mission activities, each agency, where consistent with its mission and governing authorities, and where appropriate, shall seek partnerships with State and local governments, Indian

tribes, and the private sector to promote local economic development and vitality through the use of historic properties in a manner that contributes to the long-term preservation and productive use of those properties. Each agency shall examine its policies, procedures, and capabilities to ensure that its actions encourage, support, and foster public-private initiatives and investment in the use, reuse, and rehabilitation of historic properties, to the extent such support is not inconsistent with other provisions of law, the Secretary of the Interior's Standards for Archeology and Historic Preservation, and essential national department and agency mission requirements.

SEC. 3. IMPROVING FEDERAL AGENCY PLANNING AND ACCOUNTABILITY.

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

(b) No later than September 30, 2004, each agency with real property management responsibilities shall review its regulations, management policies, and operating procedures for compliance with sections 110 and 111 of the NHPA (16 U.S.C. 470h-2 & 470h-3) and make the results of its

review available to the Council and the Secretary. If the agency determines that its regulations, management policies, and operating procedures are not in compliance with those authorities, the agency shall make amendments or revisions to bring them into compliance.

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

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

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

SEC. 4. IMPROVING FEDERAL STEWARDSHIP OF HISTORIC PROPERTIES.

(a) Each agency shall ensure that the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties as Federal assets and, where consistent with agency missions, governing law, and the nature of the properties, contributes to the local community and its economy.

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

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

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

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

SEC. 5. PROMOTING PRESERVATION THROUGH HERITAGE TOURISM.

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

(b) Where consistent with agency missions and governing law, and where appropriate, agencies shall use historic properties in their ownership in conjunction with State,

tribal, and local tourism programs to foster viable economic partnerships, including, but not limited to, cooperation and coordination with tourism officials and others with interests in the properties.

SEC. 6. NATIONAL AND HOMELAND SECURITY CONSIDERATIONS. Nothing in this order shall be construed to require any agency to take any action or disclose any information that would conflict with or compromise national and homeland security goals, policies, programs, or activities.

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

based especially on the unique or special aspects of that locale’s history, landscape (including trail systems), and culture. The terms “Federally owned” and “in Federal ownership,” and similar terms, as used in this order, do not include properties acquired by agencies as a result of foreclosure or similar actions and that are held for a period of less than 5 years.

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

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

APPENDIX B: ADVISORY COUNCIL ON HISTORIC PRESERVATION MEMBERSHIP

Chairman Milford Wayne Donaldson (California)	Secretary, Department of the Interior	Chairman, National Trust for Historic Preservation
Vice Chairman Clement A. Price (New Jersey)	Secretary, Department of Agriculture	President, National Conference of State Historic Preservation Officers
Expert Members Horace H. Foxall, Jr. (Washington) Terry Guen (Illinois) Dorothy Lippert (Washington, D.C.) John G. Williams, III (Washington)	Secretary, Department of Commerce	Observer: General Chairman, National Association of Tribal Historic Preservation Officers
Citizen Members Mark A. Sadd (West Virginia) Bradford J. White (Illinois)	Secretary, Department of Education	Observer: Secretary, Department of Homeland Security
Member of an Indian Tribe John L. Berrey (Oklahoma)	Secretary, Department of Defense	Observer: Secretary, Department of Energy
Governor Vacant	Secretary, Department of Transportation	Observer: Administrator, Environmental Protection Agency
Mayor Hon. Michael B. Coleman (Columbus, Ohio)	Secretary, Department of Housing and Urban Development	Observer: Chair, National Alliance of Preservation Commissions
Architect of the Capitol	Secretary, Department of Veterans Affairs	Observer: President, ACHP Alumni Foundation
	Administrator, General Services Administration	

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

Mandates on the management of federal real property continue to evolve and will continue to do so in the coming years as the federal government looks to reduce its size and carbon footprint. In response to these changes and trends, the ACHP issued revised guidelines in April 2011 to assist federal agencies in developing their progress reports. Specifically, the revised advisory guidelines augmented previous guidance by asking agencies to provide information regarding compliance with EO 13514, which has direct effects on historic properties within the federal real property inventory. It also requested additional information on agency preservation programs, with specific reference to their strategies for complying with Section 106 of NHPA. As in previous reporting, the use of these guidelines was not mandatory, however; and a federal agency with real property management responsibilities could, at its discretion, determine how it would report on the progress of its efforts to identify, protect, and use its historic properties.

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

mandates could be used for reporting under Section 3 (per Section 3(d)).

The following questions were asked in the 2011 Advisory Guidelines:

1. Building upon previous Section 3 reports, please explain how many historic properties have been identified and evaluated by your agency in the past three years? Has your inventory improved? Please explain.
2. Describe your agency policies that promote and/or influence the identification and evaluation of historic properties.
3. How has your agency established goals for the identification and evaluation of historic properties including whether they have been met?
4. Describe any internal reporting requirements your agency may have for the identification and evaluation of historic properties, including collections (museum and archaeological).
5. Explain how your agency has employed the use of partnerships to assist in the identification and evaluation of historic properties.
6. Provide specific examples of major challenges, successes, and or opportunities your agency has experienced in identifying historic properties over the past three years.
7. Explain how your agency has protected historic properties.
8. Describe the programs and procedures your agency has established to ensure the protection of historic properties, including compliance with Sections 106, 110, and 111 of NHPA.
9. Describe your agency policies that promote and/or influence the protection of historic properties.

10. Explain how your agency has employed the use of partnerships to assist in the protection of historic properties.
11. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in protecting historic properties over the past three years.
12. Explain how your agency has used historic properties.
13. Explain the overall condition of the historic properties within your agency's control.
14. Describe your agency policies that promote and/or influence the use of its historic properties.
15. Explain how your agency has used Section 111 (16 U.S.C. § 470h-3) of NHPA in the protection of historic properties.
16. Explain how your agency has employed the use of partnerships to assist in the use of historic properties.
17. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in using historic properties over the past three years.
18. Describe your agency's sustainability goals in accordance with EO 13514 and how these goals are being met, taking stewardship of historic properties into account.

APPENDIX D: EXECUTIVE BRANCH AGENCIES' COMPLIANCE WITH EO 13287

AGENCY	2004 baseline report filed	2005 progress report filed	2008 progress report filed	2011 progress report filed
Armed Forces Retirement Home	▲	✓		✓
Department of Agriculture	●	●	●	●
Agricultural Research Service	✓			
Forest Service	✓	✓	✓	✓
Farm Services Agency	✓	✓		
Natural Resource Conservation Service	■	✓	✓	*
Rural Development	✓	✓	*	*
Department of Commerce			✓	✓
National Oceanic and Atmospheric Administration	✓	◆	◆	◆
Department of Defense	✓		✓	
United States Army Corps of Engineers	▲	▲	▲	✓
Department of Education	*	*	*	*
Department of Energy	✓	✓		✓
Department of Health and Human Services	✓	✓	✓	✓
Department of Homeland Security	✓	✓	✓	✓
Federal Law Enforcement Training Center	✓	◆	◆	◆
Department of Housing and Urban Development	✓			
Department of the Interior	●	●	●	●
Bureau of Indian Affairs	✓	✓	✓	✓
Bureau of Land Management	✓	✓	✓	✓
Bureau of Reclamation	✓		✓	✓
Fish and Wildlife Service	✓	✓	✓	✓
National Park Service	✓	✓	✓	✓
United States Geological Survey	✓	✓		■
Department of Justice	✓	✓	✓	■

AGENCY	2004 baseline report filed	2005 progress report filed	2008 progress report filed	2011 progress report filed
Federal Bureau of Prisons	✓	✓	◆	◆
Department of Labor	✓	✓	✓	✓
Department of State	✓			
Department of Transportation	●	●	●	●
Federal Aviation Administration	✓	✓	✓	✓
Federal Highway Administration	✓	*	*	*
Federal Motor Carrier Safety Administration	*	*	*	*
Federal Railroad Administration	*	*	*	*
Federal Transit Administration	*	*	*	*
Maritime Administration	▲	✓	✓	✓
Surface Transportation Board	✓			
Department of Treasury	✓	✓		✓
Bureau of Engraving and Printing	✓	✓		
Department of Veterans Affairs	✓	✓	✓	■
Environmental Protection Agency	✓	✓	✓	✓
Federal Energy Regulatory Commission	✓	✓		
General Services Administration	✓	✓	✓	✓
National Archives and Records Administration	✓	✓		
National Aeronautics and Space Administration	✓	✓	✓	✓
National Science Foundation	*	*	*	*
Nuclear Regulatory Commission	*	*	*	*
Small Business Administration	*	*	*	*
Tennessee Valley Authority	✓			✓
United States Postal Service	✓	✓	✓	■

* agencies notified the ACHP and stated that the provisions set forth in Section 3 of EO 13287 did not apply to them, because they did not own real property.

◆ agencies notified the ACHP that they will no longer be submitting individual Section 3 of EO 13287 progress reports from their parent agency.

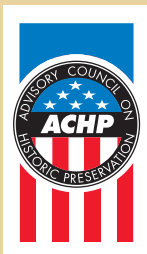
● departments allow individual bureaus and agencies within the department to submit individual Section 3 of EO 13287 progress reports.

▲ previously had not submitted under Section 3 of EO 13287.

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

APPENDIX E: FEDERAL REAL PROPERTY REPORTING

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



Preserving America's Heritage

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 PENNSYLVANIA AVENUE NW, SUITE 803

WASHINGTON, DC 20004

PHONE: 202-606-8503 • FAX: 202-606-8647

WWW.ACHP.GOV