

# EXTENDING THE LEGACY

GSA HISTORIC BUILDING STEWARDSHIP





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## A Message from the Commissioner

With over 400 historic buildings providing 50 million square feet of federal workspace—close to one-fourth of our owned inventory—GSA has many opportunities to make a difference in communities all over America. These opportunities also carry a substantial responsibility. Using and preserving the nation's public building legacy within a cost-conscious, customer-driven business mission requires vision, expert knowledge, and teamwork.

This starts with strategies for putting historic buildings to appropriate government use and keeping them financially viable—concepts that GSA first articulated in its landmark 1999 report *Held in Public Trust: PBS Strategy for Using Historic Buildings*. This follow up report on *GSA's Use and Care of Historic Buildings and other Cultural Property* is the first in a continuing effort to review, assess, and refine our stewardship techniques.

We've come a long way in the two decades since we began moving toward a leaner government of greater accountability GSA strives to provide the best possible value for our federal agency customers and the American public. While meeting customer space needs, we've put major community landmarks to new uses and have returned underutilized public buildings to active community use. We've reinvested in historic buildings within older city centers that depend on a federal presence.

We take pride in accolades we've earned—in project and public policy awards—and in the stature GSA now enjoys as an international leader in government stewardship. At the same time, our track record isn't flawless. The intent of this report is to step back, observe what has gone well and what might go better, document practices that worked, and outline new strategies to solve continuing challenges. Enjoy the report's richly illustrated success stories. Remember that your commitment to using and improving on these best practices will lead to even greater achievements.



F. Joseph Moravec  
Commissioner, Public Buildings Service

## Preface

The five years since the Center for Historic Buildings issued its first major publication, *Held in Public Trust: PBS Strategy for Using Historic Buildings*, have been a watershed period of stewardship achievement for GSA. In half a decade, the agency has risen to the forefront of the preservation profession, gaining recognition for policies and model practices making preservation integral to our business.

GSA greeted the millennium with a prominent presence in the National Preservation Conference and nationwide, onsite training to implement Executive Order 13006 *Locating Federal Facilities on Historic Properties in Our Nation's Central Cities*. The training and associated report, *GSA Historic Building Leasing*, examined how GSA is using federally and non-federally owned historic buildings, with solutions for tailoring tenant space requirements and marketing to promote location in historic buildings and districts.

In 2001, the Center released a six-volume *Preservation Desk Guide* supporting the new Executive Order and stewardship strategy, with dozens of model GSA documents created to meet preservation responsibilities associated with our activities involving historic buildings. GSA's 2002 *Legacy Vision*<sup>1</sup> subsequently took the strategy a step further to promote fiscally prudent use of our historic buildings by establishing merit-based stewardship priorities and outlining specific financial turnaround measures for those that are not performing well.

GSA's *Procedures for Historic Properties*, updated in 2003, offered guidance to help associates make the best possible use of available authorities, such as Section 111 of the National Historic Preservation Act, to keep historic buildings occupied and generating revenue to support long-term maintenance, repair, and capital investment needs. The Center's groundbreaking 2003 study *Growth, Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s*, examined our Modern federal office buildings within the context of their time, with specific guidance for assessing National Register eligibility and case studies illustrating successful solutions to the unique preservation challenges buildings of this era present.

Increasingly, agencies and private-sector architects are turning to us for guidance, not only on preservation policy and practice, but also on achieving the broader vision of well-integrated change. GSA's perimeter security "kit of parts" prototype has generated nationwide interest among design professionals since results of the Center study *Perimeter Security for Historic Buildings* appeared in McGraw Hill's 2004

*Building Security: Handbook for Architectural Planning and Design*, which includes a chapter jointly authored by GSA and National Park Service staff. Subsequent publicity in *New Urban News* and the American Society of Landscape Architect's 2004 symposium on *Designing for Security and Civic Values* shows how agency participation in forums of the design professions can multiply the public benefit derived from federal investment in solutions to preservation design problems of critical importance.

Translating policy guidance to imaginative approaches that bring about preservation success stories has demanded raising agency standards to reflect current federal qualification requirements and established standards of the profession. Since GSA issued its standard Regional Historic Preservation Officer Position Description in 2002, most regions, through reappointment or recruiting, now meet these criteria and are reporting more effective integration of preservation into the range of PBS activities affecting historic buildings. It has been my privilege to work with these energetic individuals and witness the creativity and problem-solving prowess they bring to our projects.

No success occurs in a vacuum. Our stewardship achievements depend on the efforts of front-line regional associates; contract architects, engineers, and construction firms who turn agency housing plans into physical space in new or existing buildings; and regional leadership. GSA's Regional and Assistant Regional Administrators, Portfolio Directors, Property Development Directors, and Regional Counsel have proven great supporters of agency initiatives that favor historic building reuse and historic communities.

Among the organizational advantages that have helped to make GSA's substantial stewardship achievements possible is a culture of conscientious pragmatism fostered by public-spirited, yet business-minded, national leadership. This culture also supports lateral knowledge transfer, interdisciplinary collaboration, and expertise that travels from the bottom up, as well as top down. In this environment, extraordinary stewardship achievements can become routine business.



Rolando Rivas-Camp, AIA  
Director, Center For Historic Buildings



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Supplement a historic federal courthouse with non-federal historic buildings and new construction

## SUCCESS STORY

### U.S. COURTHOUSE ANNEX

For expansion of the federal courthouse in Erie, GSA acquired underutilized historic properties – a Beaux Arts municipal library and a former Art Moderne clothing store now supplement GSA's 1930s Art Deco courthouse.

The three structures are linked by a contemporary addition that serves as a gateway. Combining old and new structures doubled the amount of occupiable space, not only enabling the site to meet the courts' requirements, but also revitalizing the historic downtown.

U.S. COURTHOUSE ANNEX  
ERIE, PA  
COURTHOUSE 1937, LIBRARY 1897,  
CLOTHING STORE 1946





## EXECUTIVE SUMMARY

This report has been prepared by the U.S. General Services Administration's Center for Historic Buildings as the first follow up to *Held in Public Trust: PBS Strategy for Using Historic Buildings*, released in 1999. The report examined GSA's stewardship successes and challenges within the framework of the agency's business approach to providing and maintaining federal workspace. The intent of the current report is to establish the structure for regular and ongoing self-assessment so that GSA can continue to refine its stewardship practices as part of its broader goal of achieving excellence as a real estate provider while supporting federal policies concerned with preservation and the economic health of older communities. A second purpose is to fulfill, in part, GSA's reporting obligations under Executive Order 13287 *Preserve America*, issued in 2003, to improve federal stewardship accountability and promote heritage tourism.

In the years since *Held in Public Trust*, GSA has progressed significantly in all six priority areas outlined in the report's Action Plan. Major achievements include:

**Administrative Order (ADM) 1020.02 *Procedures for Historic Properties*.** A top to bottom revision, completed in 2003, brings GSA's comprehensive preservation policy up-to-date for the first time in 20 years. The new procedures, addressing all action items in the report, capture GSA best preservation practices that have translated to effective stewardship programs.

**GSA *Legacy Vision*.** Recognized in the National Trust for Historic Preservation's 2003 John Chaffee Award for Achievement in Federal Policy, the *Legacy Vision* integrates GSA's portfolio and stewardship strategies to promote the economically sustainable use of historic properties, outlining specific measures for keeping historic properties financially viable.

**GSA *Preservation Desk Guide*.** The most comprehensive preservation reference guide ever created by a federal agency, this six-volume, indexed compilation includes preservation guidance, reference material, and hundreds of sample documents developed for GSA projects, conveniently organized by business activity. Reference sets were printed and distributed to GSA's 11 regions and principal Public Buildings Service offices in 2002. An online guide will be launched in 2004.

***Growth, Efficiency and Modernism.*** A richly-illustrated bound study of GSA's 1950s-70s buildings examines the Modern building inventory within the context of American architecture and the history of the era. Case studies illustrate how complex design and reinvestment issues were resolved successfully.

**Online Resources.** Major improvements in electronic access to information on GSA historic buildings include:

- New or greatly expanded Web sites for the Center and National Capital, Northwest/Arctic, Greater Southwest, and Rocky Mountain Regions;
- Redesign of the Building Preservation Plan for online access; and
- Digitization of GSA National Register nominations, accessible through the National Park Service National Register database.

**Recording and Promoting GSA Historic Buildings.** Large-format architectural images showcase GSA's historic building legacy in a brochure, poster, and screensaver series launched in 2001. The series uses a standard, high-quality graphic format and provides publication-quality images of 49 buildings representing all 11 regions.

**Preservation Design Solutions.** Between 2001 and 2003 the Center initiated three studies addressing the major recurring preservation design challenges of integrating fire safety improvements, mechanical systems, and perimeter security protection into historic properties. Each study produced an illustrated report with detailed guidance for evaluating alternative retrofit approaches and model design solutions applicable to most GSA historic buildings.

**Flexible Approaches to Codes and Standards.** Major revisions to GSA's P100 *Federal Facility Standards* in 2002 and 2003 provide appropriate flexibility and encourage balancing preservation and safety or performance goals in a creative and collaborative manner so that all design objectives are met.

**Locating in Historic Buildings and Districts.** GSA implementation of Executive Order 13006 included training for realty specialists, a standard locational clause for site solicitations, and revision of GSA's leasing preference policy to provide financial incentive for locating within historic buildings and districts.

**Online Building Preservation Plan (BPP).** Fully integrating stewardship into GSA's day-to-day business activity requires making property-specific data and guidance readily available to historic building facilities management staff and project teams. A recent redesign of the BPP database now provides 24-hour online access; refinements in progress will improve data exchange between the BPP and related GSA databases, and simplify navigation. In response to a 2001-2002 regional needs analysis, substantive database content improvements are also underway to add commonly requested information and eliminate little-used data.

**Model Reuse Projects.** Adaptive use projects under construction or completed since 1999 include reuse of a Beaux Arts library and a Moderne clothing store for GSA's expanded Federal Building and U.S. Courthouse in Erie, PA; reuse of an early 20th-century high school as attorney's offices in Gulfport, MS; conversion of a 1900s furniture warehouse to state-of-the-art offices for the Internal Revenue Service in Ogden, UT; and redevelopment of the 1840s General Post Office (Tariff Building) in Washington, DC for use as a boutique hotel under a 60-year ground lease.

**Innovative Interpretation.** GSA developed richly illustrated and narrated Web sites and on-site interpretation for the Clara Barton Office and African Burial Ground discoveries. A six-volume illustrated study and Web site provides public access to images and research on archaeological artifacts recovered from the historic Five Points district of New York City. Loss of most Five Points artifacts in the 9/11 attack of the World Trade Center underscored the value of this documentation.

Stewardship focus areas for new and continuing effort include:

**Executive Order 13287.** A baseline report using available data on the condition, National Register status, and use of GSA historic buildings will be submitted in September 2004. Efficient and meaningful follow up reporting will require some modification of existing GSA databases to generate accurate statistics and ensure that anecdotal information is supported by fact.

**Archaeological Data and Collections Management.** Compliance with the Archaeological Resources Protection Act and the National Historic Preservation Act requires systematic recordation, curatorial care, and information management for archaeological artifacts and data recovered from GSA construction sites. A 2003 Center study of GSA's current information and collections management practices, impediments, and long-term solutions for systematic compliance is an important first step to rectifying the problems and reducing GSA's exposure risk for non-compliance. Critical next steps include database development for maintaining archaeological records and study follow through to choose and implement a collections management program.

**Improved Section 106 Compliance Submissions.** Adoption of standard architectural and engineering team qualifications and documentation requirements for preservation design and construction projects will improve GSA's compliance track record and standing with national and community preservation groups. Implementing procedures for early and meaningful consultation in preservation-related portfolio actions such as site selection, reuse feasibility determinations, and disposal-retention decisions, will reduce costly delays and negative publicity resulting from public controversy.

**Alternative Perimeter Security Approaches.** Appropriate risk-management and development of creative design solutions for security processing, circulation control, envelope hardening and site modification will reduce the adverse impact of security retrofits on sensitive historic properties, encourage architecturally-integrated approaches, enable continued use of GSA-owned historic buildings and, potentially, increase reuse of historic buildings in sites GSA leases or acquires.

**Implementing *Legacy Vision*.** Solving the performance and marketing difficulties of GSA's financially-troubled historic buildings will require aggressively applying and continuously refining the turnaround strategies outlined in the *Legacy Vision* paper.

**Universal Building Preservation Plan.** Growing reliance on privately-financed development to meet government space needs, along with increased emphasis on reuse of city-center historic buildings under Executive Order 13006, compels GSA to strengthen its stewardship processes for space it leases in historic properties. A simple, achievable starting point is the development of basic BPPs as a prerequisite to redevelopment of any historic property for government use. Creation of basic BPPs as part of every new construction project would also help to maintain the architectural integrity and value of newly acquired assets.

**Preservation Design Solutions.** Developing and promoting successful preservation design solutions remains a continuing priority for raising GSA's stewardship track record and ensuring the best possible project outcomes. Focus areas for model design development include lobby circulation control and security processing, accessibility, court design guidelines compliance, and rehabilitation solutions for aging Modern buildings.

## INTRODUCTION

In 1979, GSA issued its first comprehensive preservation report written by the Task Force on Historic Preservation, convened by then Administrator Jay Solomon. Thirteen national experts in preservation regulation, advocacy, technology, planning, and urban design had been brought together to advise GSA on how it might better incorporate preservation into its day-to-day activities. Their 35-page report identified issues and offered recommendations for improvement, examining the range of GSA activities potentially affecting historic buildings—lease procurement, site acquisition, construction; disposal; and repair and alteration of existing government-owned buildings.

In the 20 years following the release of the Task Force's report, much had been accomplished, but new challenges had emerged, foremost among them economic concerns brought to prominence by the government's new focus on financial accountability. GSA was no longer a fledgling steward. By 1999, with several degreed preservation professionals in the agency's national and 11 regional preservation programs, more was to be gained from critical self-assessment and collaborative problem solving than from outside guidance. The result was one of the most far-reaching internal reports on agency preservation practices ever prepared by a landholding federal agency, *Held in Public Trust, PBS Strategy for Using Historic Buildings*. It synthesized the cumulative wisdom of all 11 GSA regions and all PBS programs concerned with design, construction, leasing, and disposal—offering case studies and successful practices for better integrating stewardship values into GSA's daily business.

The 1999 report articulated a vision of today's GSA as a business-minded agency with a social conscience, working in an environment where high-minded goals must be grounded in sound fiscal management. Portfolio planning and reinvestment, now a principal focus of the agency, emerged as the core of GSA's preservation strategy, emphasizing, above all else, the need to use historic buildings in order to keep them viable as public places and federal assets.

An economic environment demanding not just functionality, but a return on investment, put preservation in a new light: an investment philosophy of "getting it all when going to the well once"<sup>2</sup> for comprehensive modernizations could no longer be assumed universally appropriate or advisable. Future viability of GSA's historic building inventory depended on new strategies to steward buildings within the government's means. While exceptional buildings in strong markets might still merit showcase restoration, buildings in more tenuous market environments called for selective investment to remain functional and occupied.

At the end of the millennium, GSA was celebrating its 50th anniversary and taking justified pride in having acquired a reputation as a progressive and sophisticated agency. GSA's Portfolio Planning and Design Excellence programs, products of the 1990s, reflected sophistication in the financially-driven business of real estate and the process-driven art of procuring quality design. GSA's interest in supporting redevelopment and preservation as a spur to community revitalization reflected a refined understanding of the federal government's responsibility and opportunity to make a difference.

In the wake of the 1995 Oklahoma City bombing, security concerns were emerging as a challenge to the federal goal, articulated in the Cooperative Use Act, of making public buildings more accessible to the public. Accessibility by the disabled, fire safety, and systems integration remained major design challenges. It was time for GSA's compliance focus to shift from process to outcome, emphasizing how to substantively affect design, construction, and real estate decisions for positive preservation results.

*Held in Public Trust* was well received throughout GSA and attracted the attention of national preservation groups who saw in it a model for other landholding federal agencies. But a plan is of little consequence unless it is used and refined. The intent of this report is to ensure that the Public Buildings Service (PBS) continues to assess the effectiveness of its stewardship efforts, promote methods that work, and tailor its approaches to keep step with GSA's evolving business strategy. It is anticipated that subsequent reports will be released in three-year intervals corresponding to the federal reporting cycle for Executive Order 13287.

*Held in Public Trust* articulated a vision of today's GSA as a business-minded agency with a social conscience, working in an environment where high-minded goals must be grounded in sound fiscal management.



## GSA's Evolving Approach to Stewardship

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

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

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

## Organizational and Policy Changes

Since publication of *Held in Public Trust* in 1999, a number of organizational changes have taken place affecting GSA's nationwide preservation program.

### Office of the Chief Architect

In 2001, GSA National Office functions associated with design, construction, and the arts, including most Centers of Expertise, were brought together under the Office of the Chief Architect. One goal of this restructuring was to improve the efficiency of national/regional office interaction. The restructuring also reinforced, as a critical agency function, the focus on quality design attributed to the Supervisory Architect of the Treasury decades before.

Fine Arts and Art in Architecture programs formerly under the Historic Buildings and the Arts Center of Expertise are now part of the Design Excellence program. The Center for Historic Buildings functions as an independent program within the Office of the Chief Architect, along with GSA's Design Excellence and the Arts; Construction and Project Management; Courthouse Management; and Architecture, Engineering, and Urban Development programs.

Fortuitously, these changes have taken place at time when GSA's national Repair and Alterations program is growing and the Design Excellence program is broadening its scope from new construction projects to include major rehabilitation as well. As a result, the Center for Historic Buildings is getting involved in project development earlier and is able to play a more meaningful role. We expect this change to reduce the need for reactive project participation on the part of both RHPOs and the Federal Preservation Officer (FPO) by calling attention to preservation challenges before they become compliance crises.

### **National Coherence**

A current GSA organizational priority is to improve our transparency to customers and external groups by establishing uniform national/regional organizational structures and like titles for like functions. This change will result in more consistent placement of RHPOs in regional organizations. Most RHPOs are currently located within the Office of Portfolio Management.

Another initiative toward national coherence is the establishment of a standard position description (PD) for RHPOs. The new GS 808-13 GS 1001-13 PD outlines the broad range of technical, strategic, and negotiating skills required for a RHPO to effectively influence the outcome of preservation projects and decisions. Since establishing the PD in 2002, most regions, through reappointment or recruiting, now have RHPOs meeting the PD standards and are reporting more effective integration of preservation into the range of PBS activities affecting historic buildings.

A third initiative toward national coherence is a PBS reorganization that began in 2003 and continues through 2004. One goal of this reorganization is to better align corresponding headquarters and regional functions. In order to ensure the continued involvement of the headquarters preservation program in early project planning and delivery, the Center for Historic Buildings will remain under the Office of the Chief Architect.

### **GSA Procedures for Historic Properties**

ADM 1020.02 *GSA Procedures for Historic Properties*, is GSA's principal policy for implementing the NHPA and related laws, orders, and regulations. Originally issued in 1982 as ADM 1020.1 and PBS 1022.2, the comprehensive guidance was revised and reissued on October 19, 2003 as ADM 1020.2.

Since GSA's preservation procedures were established in 1982, the NHPA has been expanded by a number of substantive amendments, Executive Orders 13006 and 13287 have been issued, and a variety of implementing regulations created or modified. The new directive, developed by the Center in cooperation with RHPOs and the Office of General Counsel, brings GSA preservation policy in line with current preservation laws, regulations, and professional standards.

These revisions also take into account major changes affecting the way GSA does its day-to-day business that have occurred since the original implementing policy was established. In addition to outlining basic project-by-project compliance procedures, the new directive institutionalizes regional best practices and imaginative programs that have enabled GSA to approach stewardship issues and opportunities in a strategic manner that supports other business goals. The new ADM also encourages broader use of successful preservation practices and provides guidance addressing common compliance challenges.

Significant changes include:

- Stronger focus on strategic preservation issues, actively promoting the viability and use of historic buildings;
- Outcome-oriented guidance for more meaningful Section 106 consultation;
- More clearly defined RHPO role in PBS business decisions, with increased emphasis on cross-business networking and negotiation skills for promoting successful preservation outcomes;
- New provisions addressing leasing, site selection, and relocation for compliance with E.O. 13006 urban/historic district locational priorities;
- New programmatic requirements ensuring broader access to historic building data and preservation information;
- New guidance for management of archaeological artifacts collections;
- Establishment of preservation project design team qualifications and compliance submission standards; and
- Uniform qualification standards for construction teams doing work on, or affecting, historic materials.

### Preserve America Executive Order 13287

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

GSA has been a participant in the development of E.O. 13287 since its conception. The Advisory Council on Historic Preservation (ACHP) and the National Trust for Historic Preservation look to GSA as a leader for its success integrating stewardship responsibilities into the agency's businesslike approach to providing federal workspace. With 50 million gross square feet of GSA-controlled space in historic

buildings, we have many opportunities to make a difference by encouraging our client agencies to use historic buildings we own or have an opportunity to lease.

Most directives set forth in the new Executive Order have long been underway at GSA, including:

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

### **Improving Access to Preservation Information**

A particular concern of the new Executive Order is improving federal stewardship accountability by better managing agency information on historic buildings. GSA has exceptional resources to assist historic building projects. Among them are two unique databases: GSA's Building Preservation Plan (BPP), a computerized preservation planning tool for individual historic buildings; and the Technical Procedures Database, a Construction Specification Institute-indexed source of specifications, construction standards, and technical guidance for historic building projects.

Since its development in the early nineties, regional use of the BPP has been hampered by the lack of access and by cumbersome aspects of the software. A major upgrade completed in 2002 created a new Web-based application and all BPP data has been transferred to the program. A second upgrade focused on content, adding fields for commonly requested, previously unavailable, information and eliminating little used data. The functionality of the new database is now being tested in a pilot program that will generate BPPs for three properties representing different building scales and levels of complexity. A third upgrade will improve the database's utility and user-friendliness, adding a user's guide for generating and managing BPP data and links to relevant GSA databases such as the Asset Business Plan and Building Evaluation Report. Refinements will also be explored to accommodate information on historic leased buildings and provide more building-specific repair and alteration guidance.

Improving GSA's stewardship effectiveness by making critical information more accessible to GSA associates and project teams will remain a continuing priority. Major accomplishments completed or nearing completion include the online Preservation Desk Guide, expansion of GSA's main preservation Web page, and launching of several regional preservation program Web sites.

## GSA'S HISTORIC BUILDING INVENTORY

Historic buildings contribute significantly to the rich variety of space and settings PBS has to offer its customers. GSA's public buildings legacy includes custom houses, courthouses, post offices, border stations, and federal agency offices across the United States and its territories. Roughly half of GSA's 1600-plus owned buildings are over 50 years old. One-fourth, or 404, are listed on or likely to be eligible for the National Register of Historic Places. These 404 buildings comprise the historic building inventory described throughout this report.

More than half, or 217, of GSA's historic buildings are listed on the National Register. Thirty-two are National Historic Landmarks (NHLs), the highest level of designation. Of these, 10 are individually listed buildings and 22 are contributing buildings in NHL Districts. One additional NHL, the African Burial Ground in New York City, is an archaeological site.

The geographic distribution of GSA's historic building inventory reflects the demographic development of the U.S. in the years prior to World War II. Our historic buildings are concentrated east of the Mississippi, especially along the Eastern seaboard, with lower concentrations in the Southwestern and Midwestern states, and a more disbursed scatter of historic buildings in the less populous Western and Rocky Mountain states. A disproportionate number of our historic buildings are in the smaller towns and cities; this reflects the replacement of smaller historic buildings with new, larger buildings constructed to accommodate expanding space needs in growing cities. Older public buildings in more remote areas of stable or declining population were less likely to be transferred or demolished and replaced with new construction. The greatest volume of space in historic buildings exists in the National Capital Region, where agency headquarters dominate the historic building inventory.

GSA historic buildings are concentrated in city centers within metropolitan areas having populations of 500,000 or more (42% of the historic inventory) and are also prominent presence in small cities (25% of the historic inventory) and towns (22%). Half or more of the historic buildings in these secondary metropolitan areas and towns are courthouses, often serving their tenants as the principal monumental presence in the community. In major metropolitan areas, where courthouses and custom houses are supplemented by large (over 500,000 s.f.), office buildings more typical of the commercial architecture of

The U.S. Custom House in New Bedford, Massachusetts, is one of GSA's oldest public buildings and a National Historic Landmark.



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

their day, the government, though substantial in the number of employees it houses, may have less of a focal presence. Historic buildings in remote areas (population 2000 or less, 12% of the historic building inventory) are generally border stations.<sup>3</sup>

Over half (about 230) of GSA's historic buildings are monumental structures designed to serve a symbolic and ceremonial, as well as functional, purpose—Greek Revival, Second Empire, Romanesque, Beaux Arts, Art Deco, and Neo-Classical monuments symbolizing the permanence and stature of the federal government. The majority of these buildings are courthouses, custom houses, post offices, and agency headquarters. The monumental inventory includes a few buildings originally constructed for non-federal use, such as a train station, hotel, sanitarium, school, and insurance company office building. The remaining historic inventory is mostly comprised of non-monumental federal office buildings. The oldest buildings in the GSA inventory are simple but stately custom houses, post offices, and office buildings finished in brick, stone, and stucco. Dignified facades and modestly proportioned entry areas with elegant features such as ornamental iron staircases and groin-vaulted ceilings typify GSA's pre-Civil War buildings.

Following the Civil War, as the government sought to reunite a divided populace, the Supervising Architect of the Treasury oversaw design and construction of grand and elaborate public buildings intended to express the power and stability of the federal government. The Old Post Office and Custom House in St. Louis, MO and the State, Navy, and War Building (now the Eisenhower Executive Office Building) in Washington, DC, both completed in the 1880s, were Second Empire granite edifices set aloft on high platforms, with columned entrance pavilions and statuary setting them apart from surrounding commercial

The oldest buildings in the GSA inventory are simple but stately custom houses, post offices, and office buildings finished in brick, stone, and stucco.

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



buildings. Toward the end of the 19th century, sturdy Romanesque post offices and courthouses with campanile towers of rough cut stone, segmental arched entrances, and vast skylit work rooms quickly came into, and went out of, fashion. The World's Colombian Exposition of 1893 in Chicago, with Beaux Arts pavilions illuminated by Edison's new electric lights, spurred the City Beautiful Movement, setting a new standard for integrated urban design that would redefine the government's image for years to come. Only 43 buildings constructed before 1900 remain under GSA control today, making up 3% of the overall owned inventory.

Most (85%) of GSA's historic buildings were constructed between 1900 and 1941, years of great progress in technology, civic planning, and the emergence of America as a leader in Western culture. With the beginning of the 20th century, public buildings were often planned as part of larger complexes with important civic buildings around landscaped public spaces. Federal public buildings embodied the Beaux Arts design principles of sophisticated proportioning and space planning, with monumental entrances leading to finely finished lobbies and generous corridors that graciously welcomed citizens visiting the government offices. Public building facades, most commonly clad in white limestone or marble, faithfully recreated Classical and Renaissance models associated with the great democracies of Greece and Rome. Integrated into many of these buildings were sculptural details, murals, and statuary depicting or symbolizing the important civic activities taking place within. Close to one-third (139), of GSA's historic buildings were constructed between 1900 and 1929.

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

26%	Historic 1810-1940
10%	War Years 1941-1949
38%	Great Society 1950-1979
8%	Contemporary 1980-1993
7%	Design Excellence 1994-present
11%	Unknown



## Historic Building Styles

### Greek Revival

U.S. CUSTOM HOUSE, SAVANNAH, GA



### Second Empire

U.S. CUSTOM HOUSE, PORTLAND, ME



### Romanesque

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

## Beaux Arts

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



## Art Deco

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



## Neo-Classical

U.S. COURTHOUSE, DES MOINES, IO



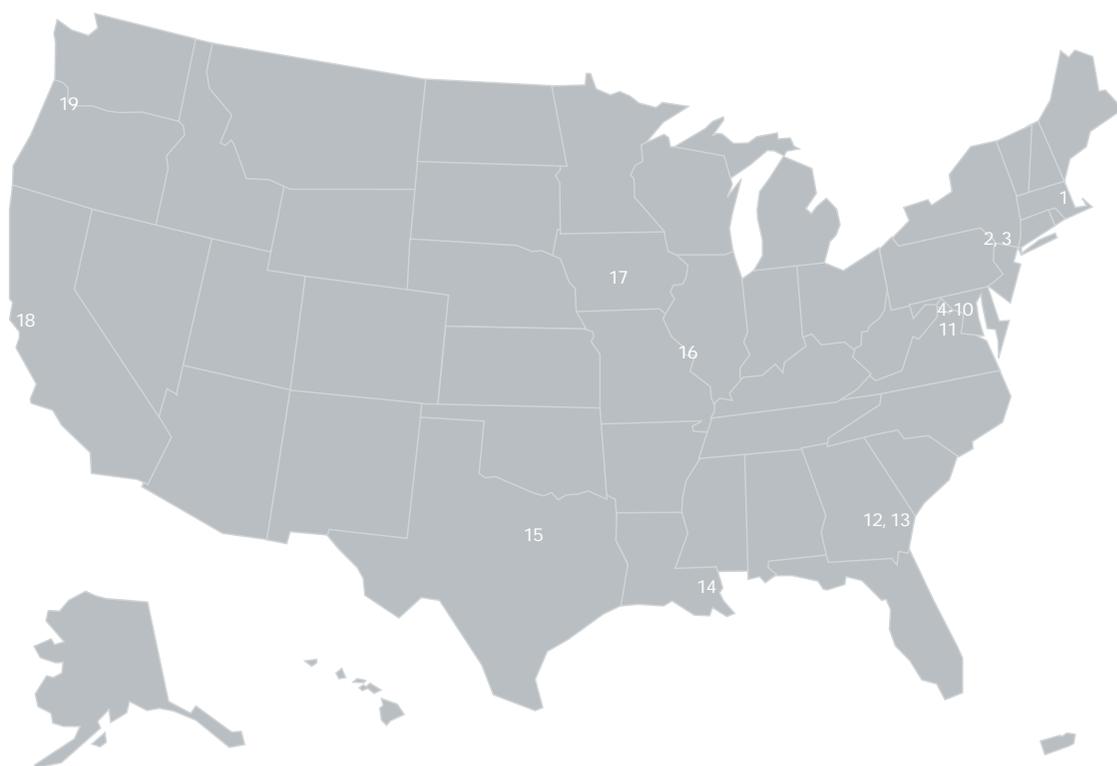
## National Historic Landmarks

Among GSA's most significant properties are 10 individually-listed National Historic Landmarks (NHLs) and 22 contributing properties within NHL Districts, and 1 NHL archaeological site. NHL is the official Department of the Interior designation given to the country's most highly significant properties. NHLs possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today fewer than 2,500 places bear this national distinction.

### GSA's National Historic Landmarks

- |  |   |
|--|---|
| 1 U.S. Custom House*<br>New Bedford, MA                                | 11 Martin Bostetter<br>U.S. Post Office<br>and Courthouse<br>Alexandria, VA |
| 2 Alexander Hamilton<br>U.S. Custom House*<br>New York, NY             | 12 U.S. Courthouse<br>Savannah, GA  |
| 3 African Burial Ground<br>New York, NY                                | 13 U.S. Custom House<br>Savannah, GA  |
| 4 U.S. Pension Building*<br>Washington, DC                             | 14 U.S. Custom House*<br>New Orleans, LA                                    |
| 5 Dwight D. Eisenhower<br>Executive Office Building*<br>Washington, DC | 15 Federal Building<br>Dallas, TX   |
| 6 General Post Office Building*<br>Washington, DC                      | 16 Old Post Office*<br>(in Disposal)<br>St. Louis, MO                       |
| 7 Blair House*<br>Washington, DC                                       | 17 Building 87<br>Fort Des Moines<br>Des Moines, IA                         |
| 8 Old Naval Observatory*<br>Washington, DC                             | 18 Federal Building<br>San Francisco, CA                                    |
| 9 Lafayette Square<br>(15 Buildings)<br>Washington, DC                 | 19 Pioneer U.S. Courthouse*<br>Portland, OR                                 |
| 10 West Heat Plant<br>Washington, DC                                   |   |

\*Individually-listed building



## Surplus World War II Property

Although World War II largely halted construction of federal office buildings, 10% of GSA's owned inventory is war-era construction.<sup>4</sup> This represents close to half of GSA's buildings more than 50 years old. By the time GSA was established in 1949, billions of dollars in surplus real property and equipment had already been transferred by the War Assets Administration to communities, institutions, and private businesses with the intent of sustaining, to the greatest extent possible, the economic benefits to hundreds of communities and individual citizens employed by the wartime production effort, as plants were adapted to serve non-military uses.

As the agency responsible for the disposition of surplus federal real property, GSA assumed responsibility for hundreds of properties still in the federal inventory, which had been constructed or confiscated by the Department of Defense for the war effort. Included in these wartime properties were numerous clusters of industrial structures constructed for the manufacture, distribution, and storage of weapons, equipment, and other war supplies. GSA adapted many of these properties to serve as offices for the expanding federal government. Among the confiscated properties are some of GSA's most imaginative examples of commercial building reuse: the Vista del Arroyo Hotel in Pasadena, CA, now housing the Court of Appeals, and the Kellogg Sanitarium in Battle Creek, MI, now a federal center serving several agencies. In recent years, GSA has disposed of a number of such properties so they can be returned to more appropriate community uses including: the Union Arcade in Asheville, NC, now being returned to its historic use as a community marketplace, and the Forest Glen Seminary, underused for years as an annex to the Army's Walter Reed Medical Center in Silver Spring, MD, for housing.

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

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

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

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

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

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

Originally constructed as part of a U.S. Army supply depot, the expanded and rehabilitated Administration Building in the Auburn industrial complex now provides state of the art workspace for GSA's Northwest Arctic Regional Headquarters.



FEDERAL COMPLEX ADMINISTRATIVE BUILDING, AUBURN, WA

### Modernism of the Great Society

President Truman created the General Services Administration in 1949 to oversee the federal government's immense building management and general procurement functions at a time when the federal government was experiencing tremendous growth. Between 1960 and 1976, GSA undertook more than 700 projects in towns across the United States. About one-third of GSA's owned inventory (nearly half by square foot area) was constructed between 1950 and 1979.

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

When GSA built Modern at its best, it produced strikingly contemporary designs by Modern masters—Marcel Breuer's sweeping Washington, DC headquarters building for the U.S. Department of Housing and Urban Development, Mies van der Rohe's sleek Federal Center in Chicago, IL, and Victor Lundy's boldly sculptural U.S. Tax Court in Washington, DC. Most federal office buildings of the time, however, are more derivative than iconic. As GSA sought to house legions of federal workers and to achieve the goals of standardization, direct purchase, mass production, and fiscal savings, economy and efficiency were often stronger driving forces than architectural distinction. The idea of public buildings as a distinct and recognizable building type gave way to an emphasis on utility and cost containment. As a result, most buildings GSA constructed during the period reflect typical office design of their time, constructed not as 100 year iconic buildings but to serve a 25-30 year lifecycle.



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



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

## Tomorrow's Landmarks: The Design Excellence Program

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

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

The Design Excellence program has produced award-winning federal buildings in central Islip, NY, Cleveland, OH, Las Vegas, NV, and many other cities. The program won a 2003 National Design Award of the Cooper Hewitt National Design Museum, Smithsonian Institution and the 2004 American Architectural Foundation Keystone Award. Public buildings completed under the program now comprise approximately 6% of the owned inventory.

## USING HISTORIC BUILDINGS

reinvestment  
reprogramming  
outleasing  
leasing  
acquisition

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

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

### Reinvestment

By reinvesting in federally owned historic office buildings, we ensure that they can continue to serve a 21st century workforce. Our chief investments are in safety, building systems improvements, and exterior maintenance.

The need for strategic use of limited funds requires PBS to make choices that will benefit some buildings more than others. PBS' general business policy is to base investment on the quantitative criterion of predicted return. Intangible values, however, are at the heart of U.S. preservation law; so, in stewardship decisions, qualitative criteria also come into play.

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

Recent Government Accountability Office (GAO) studies drawing attention to the backlog of repairs and alterations required to maintain federal properties have focused GSA and other agencies on new strategies for managing federal assets more efficiently. In response, GSA has developed a new portfolio strategy calling for disposal of properties producing too little rental revenue to cover the costs of operation, maintenance, recurring repairs and alterations, and periodic capital investment.

The Center for Historic Buildings is flagging financially-troubled historic buildings having high architectural significance and working with regions to explore alternative financial remedies and divestment options. In the meantime, profitable properties will continue to merit greater investment, and extra care must be given to control costs at buildings suffering negative cash flow. GSA priority for less profitable historic buildings will continue to be maintaining each building's basic usefulness, asset value, and integrity. In a fiscally constrained environment, GSA strives to preserve the qualities that contribute to each building's significance through low intervention repair approaches and selective restoration, focusing on highly visible historic spaces and situations in which work can be accomplished as part of other necessary repairs and alterations (e.g., fire safety or mechanical work).

### **Capital Program**

Despite the negative implications of GSA's repair and alterations backlog for historic buildings that are weak financial performers, combined funding for prospectus-level and repair and alterations projects at historic buildings over the past few years has increased steadily from approximately \$94 million in 1999 to \$157 in 2000, \$220 in 2001, and \$329 in 2002, an increase of 230% in three years. In 2003 and 2004, funding leveled to approximately \$225 and \$266 million respectively.<sup>5</sup>

After minimal capital investment in historic buildings outside of the National Capital Region in 1999 and 2000,<sup>6</sup> Congress appropriated funding for 12 prospectus level rehabilitation projects nationwide totaling \$147 million in 2001, 13 projects totaling \$256 million in 2002, 14 projects totaling \$133 million in 2003, and 11 prospectus projects totaling \$175 million in 2004.

GSA courthouse expansions that involve building or acquiring space to supplement reused historic buildings (as opposed to consolidation in a single new building) have helped to mend visual tears in the historic fabric of cities. GSA's recently completed courthouse annex in Scranton, PA, winner of a 2000 GSA Design Award, replaced an out-of-scale apartment house with a contextually designed annex building, reestablishing the architectural unity of the historic town square and allowing the courts to remain at their prominent downtown location.

Reuse approaches to customer expansion are boosting the economic health of older central business areas while reinforcing historic character. Three 2002 courthouse expansion projects reuse non-GSA historic buildings. The Brooklyn, NY courthouse reuses an 1890s Romanesque Post Office and 1930s annex acquired from the U.S. Postal Service in 1999. The Erie courthouse expansion consolidates space in a 1890s Beaux Arts library, a 1940s Moderne clothing store, and GSA's Art Deco federal courthouse to double the occupiable area. GSA's new Gulfport, MS courthouse includes an early 20th-century high school now serving as attorneys' offices.

In 2001-2003, GSA's Capital Program reinvested in a number of federal courthouses that are prominent landmarks in their communities:

### 2001

construction funded:

Potter Stewart U.S. Courthouse,  
Cincinnati, OH

Design funded:

U.S. Post Office and Courthouse,  
Pittsburgh, PA

U.S. Courthouse, Davenport, IA

### 2002

construction funded:

U.S. Courthouse, Tallahassee, FL

Howard M. Metzenbaum  
U.S. Courthouse,  
Cleveland, OH

U.S. Courthouse and Federal  
Building, Muskogee, OK

U.S. Courthouse and Federal  
Building, Providence, RI

U.S. Courthouse and Federal  
Building, Milwaukee, WI

Pioneer U.S. Courthouse,  
Portland, OR

John W. McCormack U.S. Post Office  
and Courthouse, Boston, MA

### 2003

Design funded:

William Nakamura U.S. Courthouse,  
Seattle, WA

Paul H. Findley Federal Building  
and U.S. Courthouse, Springfield, IL

### 2004

Design funded:

James A. Walsh Federal Building  
and U.S. Courthouse, Tucson, AZ

U.S. Post Office and Courthouse,  
San Antonio, TX

John Minor Wisdom U.S. Court  
of Appeals, New Orleans, LA

Everett M. Dirksen U.S. Courthouse,  
Chicago, IL

Located strategically in historic Alamo Square, the U.S. Post Office and Courthouse in San Antonio will receive a mechanical upgrade, fire safety improvements, and a new courtroom allowing the Bankruptcy Courts to expand within the building and continue to maintain a presence in the city's Central Business District.



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



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

The 2002-4 programs also include major modernization of a number of prominent historic federal buildings that are not courthouses, principally strong financial performers in Washington's monumental core. Buildings in design or construction during this period include:

U.S. Department of the Interior Building,  
Washington, DC

Internal Revenue Service Building,  
Washington, DC

Robert F. Kennedy U.S. Department  
of Justice Building, Washington, DC

Federal Building (Home Owner's Loan Corp.),  
Washington, DC

Harry S. Truman Building  
(U.S. Dept. of State), Washington, DC

Dwight D. Eisenhower Executive Office Building,  
Washington, DC

U.S. General Services Administration Building,  
Washington, DC

Herbert C. Hoover Building  
(U.S. Dept. of Commerce), Washington, DC

Mary E. Switzer Building  
(U.S. Dept. of Health and Human Services),  
Washington, DC

U.S. Immigration and Appraisers Store,  
San Francisco, CA

Federal Building, U.S. Post Office,  
and Courthouse, Hilo, HI

U.S. Custom House, Chicago, IL

Federal Building, Chicago, IL

Appropriation of funds for construction of courthouse annexes that will enable retention and reuse of historic buildings has also increased significantly. Appropriations for design of historic courthouse annexes climbed from \$0 in 2000 to \$19 million for one historic courthouse expansion in 2001 and \$34 million in 2002 for expansion of eight historic courthouses.

Historic Courthouse Expansions  
design/construction

### 2001-2002

U.S. Courthouse Addition, Norfolk, VA

U.S. Courthouse Annex, Brooklyn, NY

U.S. Courthouse Annex, Erie, PA

U.S. Courthouse Annex, Little Rock, AR

U.S. Courthouse Annex, Washington, DC

U.S. Courthouse Annex, Mobile, AL

Frank E. Moss U.S. Courthouse,  
Salt Lake City, UT  
(continuing design for 2006 construction)

Future expansion  
onto a nearby parcel  
will enable reuse of  
GSA's Walter E. Hoffman  
U.S. Courthouse  
in Norfolk.

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





FORMER CITY LIBRARY  
ERIE, PA, 1897

Historic federal buildings are also being reused in agency consolidations at two multiple building properties in the National Capital Region. At White Oak, MD the historic Administration Building of the former Naval Surface Warfare program is a gateway to the new Food and Drug Administration campus. The Census expansion in GSA's Suitland, MD Federal Center will reuse the 1930s Census Building (FOB 3) and backfill space currently occupied by National Oceanic and Atmospheric Administration (NOAA) in FOB 4. A public-private redevelopment of Washington's Southeast Federal Center (former Navy Yard Annex) will reuse a number of military-industrial buildings constructed between 1900 and World War II. Historic inspection buildings will be reused in a number of below-prospectus border station upgrades and one prospectus-level rehabilitation at Tecate, CA.

### Reprogramming (owned inventory)

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

The key to successful reprogramming is matching available buildings to suitable tenants. The best fit is that in which GSA's tenants are able to make the most of a building's historic architectural features and minimize the need for costly alteration that compromises historic character. Bankruptcy courts, for example, are ideal backfill tenants for historic courthouses and custom houses, since they do not require separate circulation and other security features that criminal courts do. Successful examples include GSA's 1890s courthouse in Little Rock, AR and the 1909 Hamilton Custom House in lower Manhattan, two showcase properties housing bankruptcy courts. The elaborately embellished Beaux Arts City Library in Erie, PA is also being reused by bankruptcy courts. The historic Gulfport, MS High School, not suited to house courtrooms or judges chambers, proved well-suited for attorneys' offices, eliminating the need for major security modifications that would have made reuse prohibitively expensive.

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

Bankruptcy courts are well suited to buildings offering ceremonial space such the Beaux Arts Library in Erie, now part of GSA's Federal courthouse complex.

### Outleasing (owned inventory)

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

Principal reasons for outleasing include:

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

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

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

Acknowledging that existing revenue disbursement procedures did little to encourage outleasing, in 1999 the Center for Historic Buildings worked with GSA's Retail Services Center of Expertise to establish a national solicitation and project review process that gives preference to regions and buildings earning outleasing revenue. Since then, outleasing has eliminated or reduced vacancies in dozens of buildings and quadrupled GSA's Budget Activity 64 (outlease revenue) fund from \$3,002,182 in 1999 to \$13,444,883 in 2003.

The most profitable of these is a seven-year groundlease of the McCormack Post Office in Boston, MA to the Massachusetts State Courts. An interim strategy to keep the building in the black until the Environmental Protection Agency's lease in nearby commercial space expires, this outlease will bring approximately \$36.5 million into the BA 64 account, making it the largest single source of revenue to the fund.

GSA's Heartland, Greater Southwest, and Northwest/Arctic Regions have been particularly successful in making use of Section 111 authority to fill vacant space and generate revenue. The Heartland Region's campaign to eliminate non-revenue producing space increased regional outleasing revenues from \$71,581 to \$2,892,523 between 1999 and 2001. The region markets vacant space for which government tenants are not available on the Internet, at workplace trade shows, and by placing signs at buildings with available space. In the Northwest/Arctic Region, every Customer Service Center has at least one realty specialist trained to initiate and administer outlease contracts.

The National Capital Region responded to the decline in revenue from the failing Old Post Office Pavilion by working energetically to find other revenue-generating outlease opportunities. As a result, the region now has nine historic properties contributing to the BA 64 fund, up from two in 1999.

The flexibility to outlease vacant space within underutilized historic buildings or execute groundleases to fund needed capital investment could have a major impact on GSA's ability to sustain the historic inventory in the long-term. It is already serving both as a temporary solution, in the absence of an immediate federal use, and as a longer-term solution to ensure continued public access to important public landmarks and means to retain the government's land and building investment in urban areas where federal needs can change over the course of a 20 or 30-year lease and where retention of centrally located, high-quality property is in the government's interest.

After years awaiting unfunded adaptive use by the Smithsonian Institution, the Robert Mills-designed General Post Office (Tariff) Building in Washington, DC reopened as a 172-room boutique hotel in 2002. Projected revenue from the 160-year old National Historic Landmark is \$50 million over the 60-year lease term, in addition to privately funded restoration of ornamental spaces, replacement of all building systems, and sensitively designed modification to bring the building up to current codes.

This precedent-setting project involved GSA's first Request for Qualifications and Use (RFQ&U) approach to outleasing. A goal was to generate sufficient revenue to fund repair, maintenance and operating costs, with a sympathetic use that would preserve, restore, and enable continued public use of the building's finest ornamental spaces.

The RFQ&U was designed to generate alternative uses and ensure selection of the best-preservation-fit use from among economically viable alternatives. Rather than listing prescriptive preservation requirements, the RFQ&U described preservation goals and community goals such as public access and consistency with local urban planning criteria. Developers best able to meet all of the project goals were the most competitive. So, while economic viability of the proposed use (including the development team's track record) was a prerequisite for consideration, preservation fit remained paramount among proposal selection factors.

The Heartland Region is now following the Tariff RFQ&U model to redevelop GSA's Art Deco federal courthouse at 811 Grand Avenue, in downtown Kansas City, MO that is the focus of current revitalization efforts. Projects like this one offer GSA exceptional opportunities for positive publicity.

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

Occasionally, projects funded by outlease revenues can help justify increasing tenant rents. Fifty-thousand dollars from outlease revenues in the Greater Southwest Region will be combined with regional repair and alteration funding to reclaim a truncated lobby in the Carl Albert Federal Building and Courthouse in McAlester, OK. In addition to increasing tenant satisfaction, reestablishing the historic lobby (now a corridor) as a ceremonial entrance will increase GSA rent revenue from the building, contributing to the building's long-term financial viability and tenant stability.

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

GSA's Art Deco federal courthouse at 811 Grand Avenue in downtown Kansas City is the focus of current revitalization efforts.



U.S. COURTHOUSE AND POST OFFICE  
KANSAS CITY, MO, 1938-1939

Outleasing also offers an important source of revenue for sustaining ornamental special-use space not supportable by federal rental revenues alone. The Northeast and Caribbean Region typically earns \$10,000 for a single filming event at the Alexander Hamilton Custom House in New York City. In response to film industry interest in its numerous historic courthouses, the Southeast Sunbelt Region has developed a marketing brochure promoting its historic buildings as film locations. To further assist regions in marketing historic buildings, the Center for Historic Buildings developed a film industry CD marketing package profiling GSA's film location opportunities. The CD includes sample agreements, lists of available and previously used film locations, and GSA regional contacts. This information is also available on the Center's Web page.

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

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

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



Non-federal lease redevelopment ensures long-term stewardship and continued public access to a National Historic Landmark

## SUCCESS STORY

### HOTEL MONACO TARIFF BUILDING

Section 111 of the National Historic Preservation Act authorizes GSA to lease underutilized historic federal buildings in whole or part to non-federal tenants, relieving GSA of the financial liability for maintaining currently unneeded property while ensuring long-term stewardship and public access to important public buildings. Mostly vacant for many years, the National Historic Landmark General Post Office (Tariff) Building in Washington reopened as a boutique hotel in 2002. Benefits to the Government include privately-funded restoration of ornamental spaces, replacement of all building systems, sensitive modifications bringing the building up to current codes, and \$50 million in rental revenue over the 60-year lease.

HOTEL MONACO, TARIFF BUILDING  
WASHINGTON, DC, 1842



## Leasing

When space is not available in government-owned buildings, GSA gives historic buildings first preference in searching for leased space. GSA leases roughly 159 million square feet in 7,100 buildings. Of these, at least 130 are historic buildings, providing 5.6 million square feet. Over half, or 76, of these buildings are owned by the U.S. Postal Service; a few are controlled by the National Park Service, with the remaining 50 or so privately owned.<sup>7</sup>

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

Through an interagency Memorandum of Understanding, GSA cooperates with the U.S. Postal Service to keep historic post offices in areas with a federal presence occupied and viable as public buildings. These leases have a critical impact on older central business areas by keeping significant civic buildings in public use. GSA's principal post office building tenant is the U.S. Courts, who occupy nearly half (34 of the 76, post office buildings, GSA leases). Generally, these are historic post offices that have housed federal courts for many years but were retained by the U.S. Postal Service when GSA was established because the Postal Service remained the principal occupant. Other major GSA tenants in post office buildings are the U.S. Customs Service (12%), Congressional offices (12%), and the Federal Bureau of Investigation (11%).

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

Although historic buildings leased through competitive space procurement had, for the most part, won the leases on their own merits, the 10% lease cost advantage was sufficient to tip the balance toward historic buildings in a number of important cases. The preference, while not making a great difference, is making a difference nevertheless—most often in small towns with tenuous economies where the presence of the federal government in the historic town center is an important stabilizing element. The final lease acquisition rule, published in the October 19, 2001 Federal Register, retained the 10% lease price advantage for historic building offerors, adding a 1.5% lease price advantage for undeveloped sites in historic districts located within city centers.

Additional pressure exerted by the Executive Order also appears to be having a positive effect on historic building lease awards. GSA's largest historic building lease until recently was the 400,000 square feet leased for GSA's Mid-Atlantic headquarters in the historic Wanamaker Department Store in downtown Philadelphia, PA. When the lease expired in 2002, GSA relocated, rather than seek temporary housing



STRAWBRIDGE & CLOTHIER BUILDING,  
PHILADELPHIA, PA

Following expiration of GSA's lease in Philadelphia's famed Wanamaker Department Store building, designed by architect Daniel Burnham in 1903, GSA sought space in another historic downtown retail icon, relocating to the 1928 Strawbridge and Clothier building in 2002.

and incur swing space costs while the Wanamaker interior was rehabilitated to meet changing space and infrastructure needs. The headquarters now leases a somewhat smaller space in the Strawbridge & Clothier Building, another historic Philadelphia department store.

Another success story is the 1914 Fairfield Center, formerly the Roxbury, MA Boys Club. Local residents rallied to halt its demolition and worked with GSA to see the lease through. The restored historic building now houses the Social Security Administration. In 2003, the Advisory Council on Historic Preservation recognized GSA's achievement with a national stewardship award.

Another Advisory Council award-winning lease redevelopment is the GSA's adaptive use of the Ogden, UT historic Boyle Furniture Warehouse to house the Internal Revenue Service. The early 20th-century industrial building, with large windows and tall floor-to-ceiling heights, has proven well-suited to configuration as open area workspace for federal offices. The project was so well received that the IRS subsequently leased a second industrial building to house a cafeteria that is also open to the public, a preservation triumph for the community and public relations success for IRS.

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

## Acquisition

Through our Urban Development and Design Excellence programs, GSA works with communities to make the most of historic properties we have an opportunity to acquire.

The Erie, PA federal courthouse expansion project mentioned above under Reinvestment, included acquisition of a municipal library and a former clothing store to supplement GSA's 1930s federal courthouse. The three structures are linked by a contemporary addition that serves as a gateway to the complex and enabled the site to meet the courts' space requirements, doubling the amount of occupiable space provided by the federal courthouse.

Recent acquisitions include a historic post office and courthouse in Fergus Falls, MN, a courthouse in New Bern, NC and a number of smaller historic structures on sites acquired for new courthouses. In Fergus Falls, GSA had been leasing space from the U.S. Postal Service for the federal courts in the Classical Revival post office, probably since GSA was established in 1949. GSA assumed ownership in 2002, converting the former postal work area to offices for the U.S. Marshals Service after the Postal Service vacated the building to relocate elsewhere. The expansion needs of the federal courts continue to position them to absorb vacated postal workspace and keep these buildings in community use.



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

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

GSA's 30-year lease-purchase of Union Station in Tacoma, WA for use by the federal courts was conditioned on GSA ensuring continued public access to the station's elegant grand rotunda. The historic rotunda now houses a Dale Chihuly glass exhibit that is open to the public. Courtrooms and other secure functions are housed in a rear addition.

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

GSA's new courthouse in Gulfport, MS includes a 1920s high school now housing the U.S. Attorney's office. GSA's expanded Mobile, AL Federal Courthouse will restore and reuse two mid-19th century houses as court offices. The region is also exploring possible acquisition of historic row houses in downtown Atlanta to accommodate increased court office space needs.

One of GSA's most important stewardship precedents in recent years is the "exchange" of a larger historic courthouse for a smaller historic landmark, enabling a shrinking federal court to maintain a monumental presence. Federal court functions in Mississippi are scheduled to move from Vicksburg to Natchez in 2005. GSA worked with officials of both cities to transfer the partially vacant Vicksburg courthouse to the city of Vicksburg and acquire the Greek Revival 1830s Memorial Hall from the city of Natchez. The transaction will allow the city of Vicksburg to consolidate its disbursed offices and open a museum commemorating the Civil War, while the federal government puts a prominent Natchez landmark back to public use. The transaction demonstrates that transfers of underutilized federal historic property can result in a net preservation gain, with cooperation between federal and local government programs and community advocates.

When reuse by the federal government or outlease to a third party is not possible, GSA's next preference is to seek alternatives that avoid destroying historic buildings. The historic Oddfellows Hall on the site of GSA's future Moss Courthouse annex in Salt Lake City, UT is being moved across the street, where it will adjoin other historic row buildings and be sold for private use, with an easement to ensure that the facade

GSA's 30-year lease-purchase of Union Station in Tacoma for use by the federal courts was conditioned on GSA ensuring continued public access to the station's elegant grand rotunda under the giant dome.

is preserved and maintained. GSA's Springfield, MA courthouse annex construction project relocated an 18th-century house owned by the Society for the Preservation of New England Antiquities to a nearby location adjoining another 18th-century house, placing the isolated residential structure in a more contextual setting.

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

### Integrating GSA's Portfolio and Stewardship Strategies

In summer 2001, the PBS Office of Portfolio Management issued a new portfolio strategy for the long-term management of the inventory, to more realistically balance repair and alteration needs against available funding. The focus of the Portfolio Strategy is to remove from the owned inventory those assets that are financially under-performing and which require—now or in the future—significant capital repairs. The intent of this initiative, called *The Portfolio Strategy for Restructuring and Reinvesting in the Owned Inventory*, is to produce a strong inventory composed of sound financial performers, capable of generating adequate revenue to support their own reinvestment needs.

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

The Portfolio Strategy involves reviewing and categorizing buildings as performing, under-performing, and non-performing, using quantitative measurement methods. Non-performing and under-performing buildings are placed on GSA's Portfolio watchlist. Each watchlisted building is then examined and a "workout" strategy for improving the building's performance or disposing of the property is developed.

Rehabilitation with annex construction for GSA's 1932 Frank E. Moss U.S. Courthouse in Salt Lake City, UT will extend the life of the 1905 Greek Revival edifice at rent rates below that of new construction meeting current Federal courthouse design requirements. The oldest building in Salt Lake City's Exchange Place historic district, the 1905 building was extended in 1912 and refaced in granite as part of a second expansion in 1932.



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

## Integrate GSA's Legacy Vision and Portfolio Strategy

### SUCCESS STORY

#### U.S. CUSTOM HOUSE

GSA's Legacy Vision includes targeted measures for turning around important historic buildings that are not performing well financially. National Historic Landmarks, like the U.S. Custom House in New Orleans, warrant special effort and creative approaches to solve financial challenges. Egress improvements at the U.S. Custom House will enable previously unoccupiable space on the building's fourth floor to be converted to office space for federal and non-federal tenants, significantly increasing rental revenue.

U.S. CUSTOM HOUSE  
NEW ORLEANS, LA, 1848-1881





Five Key Measure Thresholds denoting poor performers:

**Vacancy Rate**  
greater than local market

**Rental Rate**  
less than market rate

**Customer Satisfaction**  
less than 60%

**Repair/Replacement Needs**  
greater than 30% of Functional Replacement Value

**Funds From Operations<sup>10</sup>**  
less than \$0.00

The Portfolio Strategy initially evaluated the performance of each property on five key measures, with the following thresholds denoting poor performers, shown at left.<sup>9</sup> Results of this analysis place buildings in one of three performance tiers calling for reinvestment, corrective effort, or disposal as follows:

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

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

**Tier 3.** Poor performers for which future financial prospects remain poor are priorities for third party reinvestment financing or disposal.

Diagnostic refinements in 2003 simplified the financial analysis to focus principally on cash-flow and return-on-investment in relation to the building's functional replacement value and current condition.

### Historic Building Performance

An initial diagnosis in 2002 indicated that historic buildings were generally performing better than non-historic buildings. The analysis also pointed to physical and locational patterns affecting financial performance that come into play in devising financial turnaround strategies and priorities.

The 2002 assessment indicated that 35% of GSA's historic buildings were performing poorly. These included a number of buildings temporarily vacated for modernization and buildings for which Congress has waived federal agency rental obligations, neither group being considered for disposal. Twenty-five percent were performing marginally. Poor and marginal performers included a number of National Historic Landmarks requiring substantial turnaround effort to bring rental revenues in line with expenses and needed investment.

A look at physical characteristics and building locations showed that on the whole, the strongest performers were large buildings (over 50,000 s.f.) located in major metropolitan areas. Weaker performers tended to be smaller buildings located in smaller towns. In general, the larger the building the better the performance, suggesting that economy of scale in operating and maintaining larger buildings is significant. Average square-footage values were 175,120 for Tier 1; 152,653 for Tier 2; and 137,505 for Tier 3. Over half of the smaller historic buildings in smaller cities were poor performers being considered for disposal, with high concentrations in the Southeast Sunbelt and Heartland Regions, especially areas where population and urban real estate values had declined, resulting in greater commercial vacancy rates and lower market rate rents.

A second leading performance challenge was high building vacancy, either because of a declining federal presence or tenant relocation to other area buildings. Nearly one-fourth of the watchlisted buildings were more than 50% vacant.

### *PBS Legacy Vision*

The Center for Historic Buildings worked closely with the Office of Portfolio Management to fashion a vision of sound real estate management that also takes into account GSA's responsibility to maintain a quality inventory that provides an image for customers and that appropriately represents the federal government. Placing our portfolio strategy within a stewardship framework calls on GSA to consider taxpayer investment in a federal presence as well as space, and supports maintaining a diverse inventory that represents the government's public building legacy, especially its monumental buildings and architectural icons.

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

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

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

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



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

## Remedying Poor Financial Performance

Since the watchlist was established, the Center has been tracking non-performers and under-performers to better understand their shortcomings and identify the most effective turnaround strategies.

A first wave of disposals following the Portfolio Strategy's release principally brought to closure disposals already in progress and transfers of vacant buildings that had been lingering in the inventory. Another wave of disposals is anticipated in 2004-2005 as nearly 50 historic buildings in the disposal process are formally transferred. The good news is that the number of buildings moving from Tier 3 to Tiers 1 or 2 is increasing and the turnaround strategies in the *Legacy Vision* appear to be making a difference.

From FY02 to FY03, 44 historic buildings moved off the watchlist; 70% of those went to disposal, the remaining 30% had improved performance. From FY03 to FY04, 23 historic buildings moved off the watchlist. Nearly 75% of the 23 were upgraded, while only 25% were sent to disposal. On average, watchlisted buildings remain on the list for two years.

Factors contributing to under-performance include high operating costs, vacancies associated with repair and alteration projects, unoccupied or unusable space, reduced revenues due to low rents and appraisal values, accessibility and security costs, outlease revenues not counted as Federal Buildings Fund income, rent waivers and credits, inaccurate billing, and tenant relocation to new buildings.

Seventy-five percent of the historic building inventory is performing; however, many of these buildings are performing marginally and need attention to avoid slipping into Tier 3 status. As evaluation and tiering continues, proactive strategies for sustained positive cash flow become more important than ever.

Factors contributing to improved building performance include remeasurement, lowered operating costs, increased rents, reappraisal, expiring rent credits, completed repair and alteration projects, reduced security costs, return on investment pricing, backfilled vacant space, and recalculated replacement values. Often a combination of solutions is needed to effectively turnaround under-performing assets.

Targeted turnaround efforts have enabled GSA to keep important historic buildings occupied and viable. Icon buildings on the road to financial recovery include three exceptionally significant custom houses. Egress improvements in New Orleans, LA will enable vacant space on the building's 4th floor to be occupied. Accessibility improvements in Portland, ME will enable current tenants to remain in the building. First Impressions improvements in Port Huron, MI enabled the region to secure a long-term occupancy agreement from the courts.

GSA regions face continued challenges in striving to respond to contradictory customer desires, design directives, and policy goals. Nevertheless, we can avoid adding to net historic building vacancy in older central business areas with far-sighted local portfolio planning to ensure that new construction—especially courthouse expansion—supplements, rather than replaces, important historic buildings.

Accessibility improvements in the U.S. Custom House in Portland will enable current tenants to remain in the building, a National Historic Landmark.

## Performance Obstacles

A continued challenge facing GSA-owned historic buildings is the market-based pricing system that provides the revenue for the Federal Buildings Fund. It is difficult to recover repair and alteration costs for small monumental buildings located in depressed markets, since these buildings cost essentially the same to maintain in a poor market environment as they do in a strong market environment.

There are precedents and limited authorities for charging above-market rent rates for both new construction and rehabilitation in which agency-specific requirements demand a higher investment level. For example, space that meets the requirements of the *Court Design Guide* demands specialized lease construction or construction of new federal space that cannot be procured at market rates. GSA can “level the playing field” when comparing rehabilitation and new construction options by exploring payback for reuse at higher than market rates, to take into account the cost of adherence to the *Court Design Guide* and other customer-specific requirements. In many cases, historic buildings can be rehabilitated with cost recovery at rates above market but still less than the recovery rent rate for comparable new construction. Special pricing tools have also been used for remote facilities, such as border stations, where no comparable space exists upon which to base rent. GSA sets the rental rate at these locations to cover operating and repair costs.

High vacancies in a number of historic buildings reflect a diminished federal presence that may be too small to support continued housing in federally-owned property unless an appropriate outlease arrangement can be made to rent out unoccupied space and cover the income gap. In other cases, historic building vacancy can be substantially reduced or avoided by adjusting agency housing plans to give preference to historic buildings, as federal law calls on GSA and its client agencies to do. This requires identifying federal tenants in both owned and leased space willing to consolidate in GSA historic buildings.

In striving to maintain government space by commercial real estate standards, GSA needs to develop mechanisms that take into consideration important distinctions between government and private business. A 60-year investment analysis, for instance, which requires pursuing an Office of Management and Budget (OMB) rule revision, will allow GSA to take into account differences in building quality not evident in a standard 20-year payback analysis. Incorporating such qualitative factors into return on investment analysis will also help to ensure against the government accepting, in depressed or remote locations, a transient image that simply reflects surrounding market conditions, in favor of the more permanent, monumental presence already created for the government at substantial public expense.

The *Legacy Vision* is a first step toward reconciling GSA's financial accountability and stewardship mandates, going beyond simply doing no harm to acknowledging the higher philosophical goal of

contributing to communities and American culture that serve a symbolic, as well as functional role. With the advent of GSA's Design Excellence program in 1994, the continued relevance of this symbolic purpose has been validated.

Focusing on the historic building inventory requires GSA to step back and consider local occupancy strategies from a global perspective to ensure the economic health of these special buildings as a group. OMB rule modifications may be necessary to address the challenges of financially troubled historic buildings in weak markets that are fully occupied but unable to charge rents sufficient to support the costs of necessary reinvestment. Appraisal methods that tend to devalue historic buildings simply because of age merit reexamination.

Reconciling the NHPA mandate giving historic buildings preference to the performance challenges of historic buildings remains an obstacle that may be met only by tailoring our performance analysis to factor in tangible values not currently captured, such as overall construction quality, architectural richness, and landmark recognition value.

### **Promoting Urban Location and Reuse**

Executive Order 13006 calls upon federal agencies to "utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in our central business areas." In 2000 and early 2001, GSA's Center for Historic Buildings, Center for Urban Development, and Rocky Mountain Region collaborated with the National Trust for Historic Preservation, the American Institute of Architects Historic Resources Committee, and local preservation groups to provide on-site E.O. 13006 training at each of GSA's eleven regions.

The half-day training sessions focused on how to accomplish the Order's preservation and urban location goals within GSA's business framework. Associates briefed regional realty specialists on the process for E.O. 13006 compliance and presented GSA adaptive use success stories. The Trust, along with local preservation architects and advocacy groups, presented case studies and advice on how to overcome common E.O. 13006 challenges such as compliance with accessibility and safety requirements.

During interactive sessions held with associates following the presentations, realty specialists described difficulties selling customers on urban location and historic building reuse when the federal policy is not actively supported by tenant agency upper management. As a first step toward addressing this challenge, GSA held a briefing with facility management executives representing several client agencies to discuss their concerns, following the cross-country training program.

In the wake of the training, GSA has achieved several important E.O. 13006 successes, most notably the reuse of the Boyle furniture warehouse in Ogden, UT, the Boys Club building in Roxbury, MA, and the

Constructed to house the Federal Government's largest interagency meeting space, the Andrew W. Mellon Auditorium building was modernized in 2002 as the centerpiece of the Environmental Protection Agency's new consolidated headquarters in the Federal Triangle. Seating up to 2,500 people, the space continues to serve a variety of Federal agencies, also earning revenue from nonprofit associations and private groups who rent the auditorium for ceremonies, fund raisers, and other events.

Strawbridge Department Store building in Philadelphia, PA detailed above under Leasing. Still, many tenants do not welcome reuse of historic buildings, preferring the spatial flexibility offered by contemporary office buildings and the plentiful parking available at locations outside of urban centers.

Acquisition of sites for lease or federal construction often present preservation challenges since the simplest approach to meeting client requirements is to clear the site and begin with a clean slate. But the NHPA and E.O. 13006 call on the federal government to be more imaginative in meeting space requirements. This requires aggressively promoting city center locations and construction alternatives that integrate existing historic buildings into space programs for new construction. Where tenant agencies are unable or unwilling to reuse historic buildings, only sites that do not contain historic buildings should be selected, rather than acquiring and destroying historic buildings that might be reused by others.

Among today's most formidable challenges to reusing historic buildings not already owned by the federal government are tightened security setback requirements, which, if strictly applied, would permit future reuse of few, if any, historic buildings. However, conferences sponsored by the National Park Service, the American Society of Landscape Architects, and the American Institute of Architects, along with publications such as the National Capital Planning Commission's master plan for security in the nation's capital, continue to exert pressure on federal agencies to examine each circumstance individually, enabling reuse of historic buildings where reasonable security protection can be achieved within an urban streetscape context.

Continued training to coach associates on effectively promoting urban location and reuse will reinforce these efforts. Also critical is executive-level interaction with client agencies to establish top-down interest in reuse among GSA's tenants.

### **Stewardship Planning for Historic Properties Leaving the Federal Inventory**

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

GSA failure to consult State Historic Preservation Officers (SHPOs) and communities until after excess decisions or transfer arrangements have been made precludes meaningful opportunity to discuss alternatives, engendering mistrust and exposing GSA to litigation risk. Decisions to retain or excess historic property are portfolio management responsibilities, requiring Regional Historic Preservation Officer



ANDREW W. MELLON AUDITORIUM  
WASHINGTON, DC, 1935

(RHPO) involvement, that come under NHPA Section 110, for which consultation does *not* mandate public participation as required in Section 106 consultation. This distinction enables GSA to initiate informal discussion with SHPOs when financial performance challenges or other viability problems raise the possibility of disposal, without introducing risk of political fallout or a speculative real estate response that might result from premature public disclosure of a historic property transfer.

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

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

Transfer transactions, including the development of protective documents and the transfer process, are Section 106 undertakings requiring public participation and typically concluding in a Memorandum of Agreement (MOA). The agreement outlines transfer processes specific to the property and its preservation, referencing relevant authorities, covenants, and other legally binding documents protecting the property and its character-defining qualities. RHPO involvement with the regional disposal programs ensures that transfers of historic property are consistent with GSA preservation policy and comply with federal preservation laws and regulations.<sup>13</sup> RHPOs also participate in transfers involving highly significant or politically sensitive historic property excessed by other agencies.

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

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

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

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

Over the years, it has become increasingly evident that covenants alone do not always provide sufficient protection, evidenced in the deterioration of historic bungalows transferred from La Vista del Arroyo Hotel property in Pasadena, CA when it was redeveloped as the Richard Chambers U.S. Court of Appeals and the destruction of the National Historic Landmark U.S. Naval Asylum in Philadelphia, PA.

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

For locally significant properties, continuing oversight can be provided through an easement overseen by a local non-profit organization, as GSA is exploring for long-term supervision of the Oddfellows Hall being relocated from GSA's Salt Lake City Courthouse annex site. GSA also has the authority to retain easements, such as the proposed easement providing stewardship oversight of the Clara Barton Office in Washington, DC to be maintained as a museum within a mixed-use redevelopment.

Early 20th century industrial buildings offer adaptable office space and lasting public relations benefits

## SUCCESS STORY

### TWIN RIVERS COMPLEX

When searching for leased space, GSA gives historic buildings first preference. GSA's lease redevelopment of the Boyle Furniture Warehouse in Ogden houses the Internal Revenue Service. The early 20th-century industrial building, with large windows and tall floor-to-ceiling heights, has proven well suited to configuration as state-of-the-art open area workspace. The project won an Advisory Council Federal Partnership Award in 2002. In 2004, the IRS leased a second industrial facility, the 1906 Scowcroft building, to house a cafeteria that is also open to the public. Renovation of these buildings has spurred revitalization of the surrounding area.

TWIN RIVERS COMPLEX  
OGDEN, UT, 1903, ADDITION 2002





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

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

Easements offer the advantage over covenants of providing for ongoing preservation oversight. They can be used to preserve exteriors, define alterations subject to external review, preserve specific spaces, or provide for limited public access to significant areas, such as the Clara Barton Office in the Square 457 redevelopment. Easements are best held by states or non-profit groups with programs in place to enforce the easement through periodic inspection. Where this is not possible or practical, GSA has the option of holding the easement and retaining enforcement rights—more practical for easily accessible properties than remote ones that GSA does not have the ability to closely oversee. Easements can also include a reversionary clause if the property is not used and cared for in accordance with the deed.

#### **Old U.S. Mint, San Francisco, CA**

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

Constructed between 1869 and 1874, the Greek Revival building became one of the principal mints in the U.S. during the 19th century and the chief federal depository for gold and silver mined in the West. Designed by Alfred B. Mullett, it is one of the few downtown buildings to survive both the 1906 earthquake and fire and the 1989 Loma Prieta earthquake.

The Old U.S. Mint, a four-story National Historic Landmark in San Francisco, is one of the few downtown buildings to survive both the 1906 earthquake and fire and the 1989 Loma Prieta earthquake.



HISTORIC PHOTOGRAPH OF THE OLD U.S. MINT  
SAN FRANCISCO, CA, 1869-1874

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

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

#### **Old Post Office and Custom House, St. Louis, MO**

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

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

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

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

### Square 457 (Clara Barton Office), Washington, DC

Square 457, located at 437-441 7th Street, NW in Washington, DC, is one of a number of commercial properties that GSA acquired when Congress mandated sunset provisions for the Pennsylvania Avenue Development Corporation (PADC), established in the late 1960s amid growing concern that the grand artery of the nation's capital was no longer an appropriate backdrop for inaugural parades and other ceremonial events of the State. PADC's jurisdiction extended from Pennsylvania Avenue to the city's historic commercial district including Washington's Chinatown. PADC's legacy includes restoration and reuse of the Willard Hotel, Gallery Row, and other historic buildings; \$1.5 billion in private-sector investment; and resurgence of the area as a residential neighborhood, now referred to as the Penn Quarter.

GSA's 1998 solicitation for commercial redevelopment of Square 457, one of the last remaining development parcels in the area, included provisions requiring restoration, substantial reconstruction of one historic facade, and preservation with public access to a space Clara Barton used as an office during the 1860s. Transfer provisions include a government easement on the facades and Clara Barton's office, where 19th-century artifacts such as clothing, papers, and an original room sign, were discovered in November 1997. Barton, who later founded the American Red Cross, used the office as a base for providing medical assistance and supplies to wounded soldiers during the Civil War, and at President Lincoln's request, provided assistance to families trying to locate missing Union soldiers. GSA is pursuing preservation of the Clara Barton rooms as museum space, while Dallas-based JPI is redeveloping the rest of the site as a 428-luxury apartment complex, scheduled for completion in 2005.



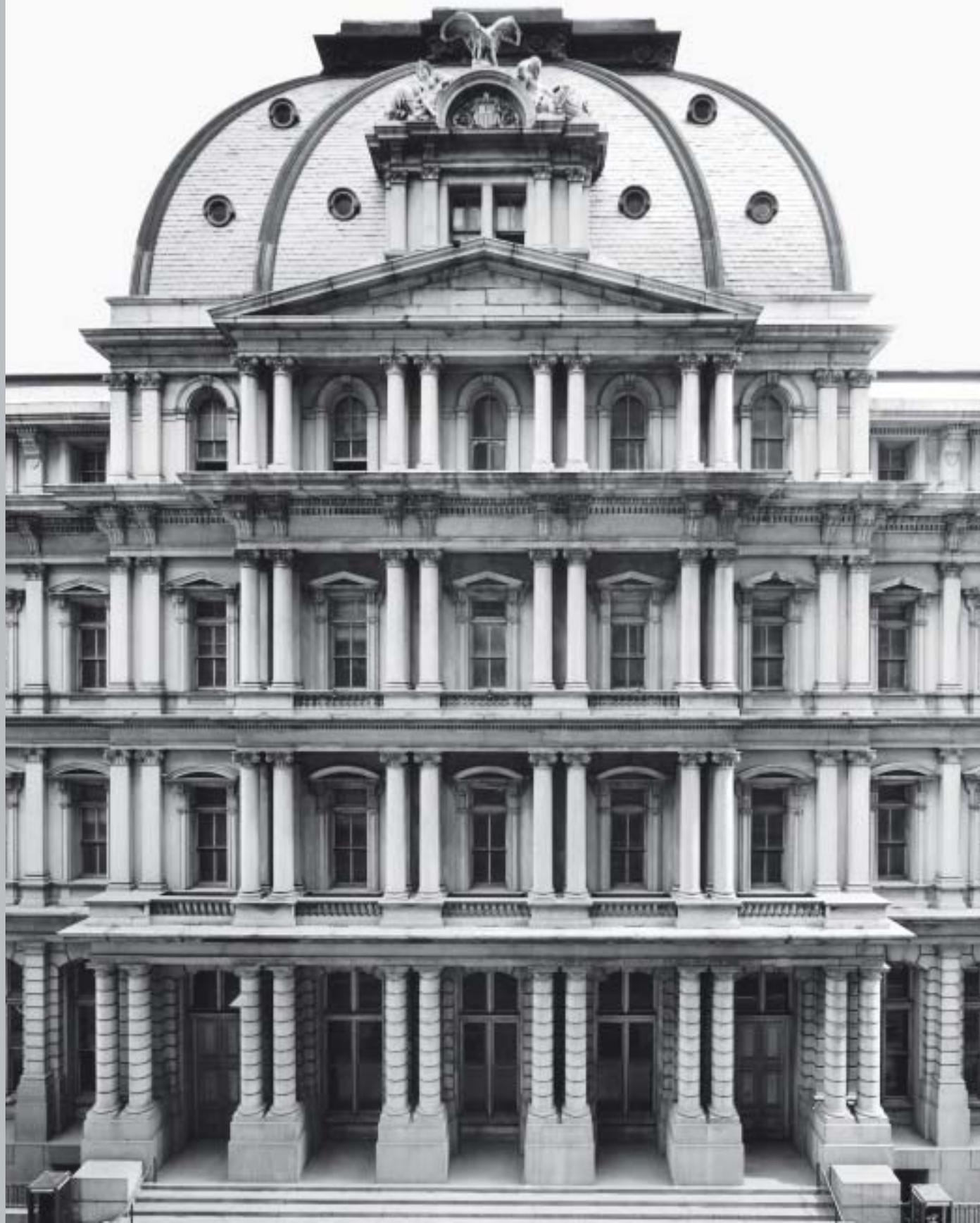
SIGN RECOVERED FROM THE SITE OF CLARA BARTON'S CIVIL WAR OFFICE, DISCOVERED IN A 19TH-CENTURY ROW HOUSE ACQUIRED BY GSA FROM THE FORMER PENNSYLVANIA AVENUE DEVELOPMENT CORPORATION. PRIVATE REDEVELOPMENT WILL PRESERVE THE ROOMS AS MUSEUM SPACE.

### Lighthouse partnership

The National Historic Lighthouse Preservation Act of 2000 (NHLPA) provides special authority for disposal of historic lighthouses and stations, with a national program to promote long-term preservation and reuse of the high-maintenance structures. The NHLPA allows lighthouse properties to be transferred at no cost to federal agencies, state and local governments, non-profit corporations, and community development organizations for park and recreation, cultural and historic, and educational uses.

Under the Act, Property Disposal is disposing of over 300 light stations being declared excess by the U.S. Coast Guard over the next 10 years and working with the National Park Service to identify potential uses and owners. The National Park Service brings to the collaboration its experience of developing public-private partnerships to fund preservation of remotely located buildings within National Parks.

GSA's recent disposal of the Tawas Coast Guard Station in Losco County, MI is a preservation success story. On November 7, 2002, GSA conveyed the historic lighthouse to Michigan's Department of Natural Resources through GSA's public benefit program for historic monuments. Constructed in 1876, the 70-foot tower is listed on the National Register of Historic Places. The state will operate the lighthouse as a museum and educational site.



Transfer provisions for third-party oversight of major changes help ensure long-term stewardship

## SUCCESS STORY

### OLD POST OFFICE AND CUSTOM HOUSE

Situated in the downtown area known as Post Office Square – the focus of current revitalization efforts, GSA’s Old Post Office and Custom House in St. Louis was largely vacant following construction of the nearby Thomas Eagleton U.S. Courthouse. The National Historic Landmark Old Post Office will be transferred to Missouri for occupancy by state courts, Webster University, and commercial-retail tenants, putting original courtrooms back to use and allowing the building to contribute to the vitality of Post Office Square once again. To ensure long-term protection of the building’s architecturally exceptional interior and exterior, transfer provisions include third-party review of substantial alterations or subsequent changes of use. The National Park Service’s National Historic Landmark program has assumed this responsibility.

OLD POST OFFICE AND CUSTOM HOUSE  
ST. LOUIS, MO, 1873-1884



## CARE AND TREATMENT OF HISTORIC BUILDINGS

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

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

GSA is striving to move beyond rote compliance with the prescriptive provisions of the NHPA to embrace the spirit of the law and related directives by creating internal tools, training, recognition programs, and procedures that reinforce the importance of decisions and project results that demonstrate good stewardship. Since 1999, GSA has achieved several major successes toward that end:

- Heritage Awards, which have continued to grow in content and stature, culminating in the program's incorporation into the GSA Design Awards for 2005;
- GSA procedures for historic properties, including ADM 1020, reinforcing the importance of stewardship and successful project/decision results as agency policy;
- Expanded central and regional preservation Web sites;
- Greatly improved levels of regional support with formal establishment of qualifying standards and range of duties for Regional Historic Preservation Officers; and
- Six-volume Preservation Desk Guide of model documents and stewardship-minded document samples covering every aspect of GSA activity.

All of these initiatives have contributed to GSA's rising profile as a progressive and conscientious steward.

At the same time, GSA's stewardship track record continues to suffer from compliance setbacks stemming from inadequate understanding of preservation issues associated with site selection, new construction in historic districts, and other undertakings that do not necessarily involve GSA historic property but may have a major effect on historic buildings, historic areas, or archaeological artifacts.

Compliance improvement priorities include:

- Promoting reuse of historic buildings by working with regions to achieve full building occupancies, maximize revenue, and reduce operating costs;
- Achieving better repair and alteration project outcomes by assisting regions in procuring preservation services and using the model preservation design scope of work for historic building projects;
- Promoting site selection that complies with E.O. 13006 (recommending locations in historic areas, and reusing historic buildings where possible) but avoids acquiring sites encumbered with historic buildings that cannot be reused;
- Initiating early, meaningful consultation for new construction affecting historic buildings;
- Increasing regional use of Building Preservation Plans by making them easier to use and by accelerating completion of plans for the remainder of the historic inventory;
- Accelerating nomination of eligible properties to the National Register; and
- Establishing collections and records management for archaeological artifacts.

## Section 110 Compliance: Identification and Preservation Planning

### Nominating Properties to the National Register

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

Although agencies are required to proactively nominate properties and prepare preservation plans, GSA has never sustained a program for nominating potentially eligible properties. Among GSA regions, the Greater Southwest Region has been among the most proactive, listing 8 buildings in 2000 and 7 buildings in 2001.

Since then, GSA regions listed only one property, the Charles E. Simons, Jr. Federal Building and U.S. Courthouse in Aiken, SC in 2003. Continuing at the current rate, it would take 200 years to comply with Section 110, not counting buildings that will become eligible on reaching 50 years of age in the interim. Even at the 2000-2001 pace of nominations, it would take 25 years to nominate the remaining 200 properties that have been determined eligible or likely to be eligible.

GSA's failure to regularly nominate eligible properties is not simply a reflection of recalcitrance or neglect. In an environment of limited project funding, funding for studies such as National Register nominations compete with funding for repair and alterations. It has been reasonable to conclude that limited funds are better spent procuring qualified preservation design teams and construction firms to ensure appropriate repairs and alterations in historic buildings than to recognize and nominate properties at the expense of good preservation design and construction.

Provided that GSA sets the same preservation standard for potentially eligible, as well as National Register listed, properties, the preservation outcome should be the same. However, there are important reasons to actively pursue National Register designation:

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

In 2000 and 2001, the Greater Southwest Region nominated these buildings to the National Register:

U.S. Post Office/Courthouse,  
Texarkana, AR

U.S. Post Office/Courthouse,  
Alexandria, LA

Federal Building/U.S. Courthouse,  
Baton Rouge, LA

Federal Building, Alamogordo, NM

Federal Building/U.S. Courthouse,  
Lawton, OK

Carl Albert Federal Building/U.S.  
Courthouse, McAlester, OK

Federal Building/U.S. Courthouse,  
Muskogee, OK

Federal Building, Tulsa, OK

U.S. Courthouse, Austin, TX

U.S. Courthouse, El Paso, TX

Elton B. Mahon U.S. Courthouse,  
Fort Worth, TX

U.S. Post Office/Courthouse,  
Galveston, TX

U.S. Post Office/Courthouse/Custom  
House, Laredo, TX

Federal Building/U.S. Courthouse,  
Marshall, TX

Federal Building/U.S. Post  
Office/Courthouse, Tyler, TX



ELTON B. MAHON U.S. COURTHOUSE, FORT WORTH, TX, 1933-1934

Listing of National Register eligible properties took on a new urgency in 2004, when General Counsel review clarified the limits of GSA's authority to use outlease proceeds, compelling GSA to accelerate listing or sacrifice its flexibility to invest outlease proceeds strategically. The challenge is to maintain the viability of significant properties and reprogram funds as appropriate to ensure that no income is lost at the end of the fiscal year when funds expire.

At the same time, new reporting responsibilities under E.O. 13287 are increasing federal accountability for proactively complying with Section 110 identification and designation requirements. In response, GSA is exploring alternatives for accelerating designation of its eligible properties, beginning with not-yet-listed Legacy (monumental) buildings that most merit retention and reinvestment to remain viable in federal use. Alternatives include bundling listings geographically or thematically to achieve economies of scale. A 3-5 year phased program to designate approximately 200 National Register eligible properties would demonstrate that GSA is making a concerted effort to comply with the law.

### Digitizing National Register Nominations

Along with initiatives to accelerate designation of eligible properties, GSA is working to make existing National Register nomination documents more accessible for use by project teams, clients, and others interested in GSA's historic buildings. Through an agreement with the National Park Service, digitization of GSA's National Register nominations has been accelerated and documentation for all individually listed properties is now available online. Nominations for contributing properties in historic districts and thematic listings will follow.

### Evaluating Buildings Under 50: 1950s-70s Modernism

Although only a few GSA Modern buildings were designed by recognized Modern masters, some will become National Register eligible when they reach 50 years of age, because of important historic events that have taken place within them, because they represent significant architectural types, or because they will meet other National Register eligibility criteria. As the Modern buildings of the Great Society era become cultural vestiges of a past generation, new preservation advocates have emerged, in at least one case completely taking GSA by surprise.

In Denver, CO local citizens railed against GSA for a planned courthouse entrance expansion that would require removal of a colonnade constructed in 1965. Modern fans identified the Byron Rogers U.S. Courthouse, designed by local architectural firms James Sudler Associates and Fisher and Davis, as Denver's best example of "New Formalism." In this case, the need for change to accommodate new security requirements and changing circulation patterns—coupled with new awareness of the building's potential National Register eligibility—called attention to a paradox that GSA can expect to face again.

All of these buildings will require substantial reinvestment to remain useful, if not replaced or excessed. Many contain materials and systems that have not aged well and cannot be repaired or even replaced in kind. Some require whole new facades. All will need to meet new security standards, accommodating queuing space that may exceed the capacity of existing entrance lobbies, as in the Byron Rogers Courthouse. Tenants will continue to request changes to update lobbies, humanize stark plazas, and improve wayfinding where architectural hierarchy to distinguish public circulation and ceremonial space is absent.

GSA's challenge with this segment of the inventory is not only to maintain functionality and customer satisfaction within a stewardship framework that takes into account potential National Register eligibility, but also to weigh the merit of investing in these properties against that of investing in other properties, including GSA's 19th and early-20th century monumental buildings, of superior construction quality and cultural value.

GSA's Office of the Chief Architect enlisted leading American architects, preservationists, and architectural historians to participate in forums held at Yale University (2000), GSA Headquarters (2001), and the National Preservation Conferences in Providence, RI (2001), and Cleveland, OH (2002). As a follow up to these discussions, the Center for Historic Buildings commissioned a study, to explore the broader historical and architectural context within which these buildings were designed and constructed, to get a sense of their overall merit.

*Growth Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s*, released by GSA's Center for Historic Buildings in 2003, includes an Eligibility Assessment Tool to assist regional associates in determining the likelihood that a building of this era may be eligible for the National Register of Historic Places (NR) now or in the future on reaching the 50 year NR age threshold.

Results were released in a bound and illustrated report entitled *Growth, Efficiency and Modernism*, in 2003. The first study to substantively explore the character of these buildings and the changing philosophy of the federal government's public buildings program, the report documents the range and highlights of GSA's Modern inventory, as well as the challenging design issues they are raising today. It also contains an Eligibility Assessment Tool to assist regional preservation associates in determining the likelihood that a building of this era may be determined exceptionally significant now or potentially eligible in the future. Since its release, the report has generated considerable interest in the preservation community and commendation from oversight groups impressed with the study's methodical approach to categorizing and evaluating this voluminous, but little understood, body of federal assets.



### **Building Preservation Plans**

The Building Preservation Plan (BPP) database was created in 1989 to comply with Section 110's requirement that federal agencies "establish a program for the identification, evaluation, nomination... and protection of historic properties, [ensuring that]... such properties are managed and maintained in a way that considers the preservation of their historic, archaeological, architectural, and cultural values." The program provides comprehensive information on individual buildings, including images and documentation of alterations; zoned floor plans to show the relative significance of interior and exterior spaces; inventories of original materials and deficiencies; and recommended treatments. BPPs have been completed for 212 buildings (see Appendix A).

A major BPP database upgrade now underway will expand the breadth of the database to fill previously unmet project information needs, eliminate unnecessary detail that is not being used, and make this information accessible to all associates for the first time. Under Phases I and II completed in 2003, the BPP became Internet accessible, with a new look and improved navigation to make it more user-friendly.

Under Phase III more substantive changes will enable expanded use of the database by linking to other PBS databases and programs to ensure that project planning mechanisms are tied to guidance in the BPP. The new BPP will also provide needed information that is not currently available, including an expanded range of building images, more in-depth analysis of historic material deficiencies and solutions, building-specific rehabilitation design guidance, better navigation features, and new data fields enabling National Register nomination forms to be generated from BPPs. To improve the availability of current technical guidance for remedying historic material deficiencies, BPP scopes of work will also require architects to review, update, and add, if necessary, applicable guidance to the Technical Procedures Database linked to the BPP.

### **Archaeology**

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

Discovery of the African Burial Ground beneath a parking lot at 290 Broadway, New York, NY resulted in the most significant archeological recovery in GSA history. Designated a National Historic Landmark in 1993, the artifacts and human remains recovered yielded information on the contribution that enslaved and free African men, women, and children made to the economy, development, and culture of colonial New York.

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



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

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

Although extraction of samples is sometimes done during construction, completing site testing prior to construction, as a design-phase study, reduces the risk of unanticipated cost and delay for artifact recovery. The discovery of artifacts during site testing often, but not always, necessitates artifact recovery (Phase III). When artifacts are discovered, one of the roles of GSA's archaeological consultant team is to advise GSA on the significance and likely National Register eligibility of the artifacts. In consultation with the State Historic Preservation Officer and, at his or her discretion, the Advisory Council on Historic Preservation, GSA determines whether the significance of the discovery merits further artifact recovery, analysis, and storage. The goals and methodology of recovery and long-term curatorial care are then laid out in a Memorandum of Agreement.

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



Seize space expansion opportunities to mend torn urban fabric while reusing a prominent historic building

## SUCCESS STORY

### WILLIAM J. NEALON FEDERAL BUILDING AND U.S. COURTHOUSE

Courthouse expansions that involve constructing or acquiring space to supplement historic buildings can revitalize historic main streets and even help mend visual tears in the fabric of cities. The courthouse annex in Scranton, winner of a 2000 GSA Design Award, reestablished the architectural unity of the town square by replacing a deteriorated, out-of-scale apartment house with a contextually designed annex and allowed the courts to remain at their prominent downtown location.

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



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

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

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

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

To determine what approach or combination of approaches will be most cost-effective in the long-run and achieve the greatest public benefit value, the Center for Historic Buildings recently completed an initial study to assess GSA's current and future archaeological artifact storage needs and to recommend collections management approaches that meet the needs of all GSA regions. Storage alternatives requiring further study include construction, modification, or leasing of regional facilities or a central facility to

Artifacts recovered from the Daniel P. Moynihan U.S. Courthouse site tell a rich story about the working-class residents of New York's most notorious early 19th century slum—Five Points.



EARLY RENDERING OF THE FIVE POINTS NEIGHBORHOOD OF LOWER MANHATTAN

house artifacts for which no secure or compliant storage alternatives exist. Such a facility or facilities might also house architectural artifacts salvaged and retained for mitigation under project-specific compliance agreements. This study and follow up analysis will:

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

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

GSA also seeks to ensure public benefit from federal investment in archaeological artifact recovery and research. Compliance agreements for artifact recovery should include interpretation, dissemination of research findings, and provisions for public display, when possible. Interpretive measures include, but are not limited to: educational videos; indoor and outdoor exhibits; and publication of findings on the Internet or in lay and professional journals. Contract archaeologists are encouraged to publish their findings, provided GSA is acknowledged and GSA Regional and Federal Preservation Officers are provided opportunities for review and comment prior to publication.

Important archaeological efforts completed since 1999 include research and recovery in association with the Jose V. Toledo Federal Building and U.S. Courthouse rehabilitation in San Juan, PR, and, in New York City, the Daniel P. Moynihan U.S. Courthouse at Foley Square in lower Manhattan (Five Points discovery) and the Ted Weiss Federal Building at 290 Broadway (African Burial Ground discovery). Findings from the Five Points and African Burial Ground recovery efforts are available on the Northeast and Caribbean regional Web site.

The San Juan project's archaeological excavations yielded 16,000 artifacts, some dating to the 16th century. GSA collaborated with a local university to include the community in the interpretation and display of the artifacts. Over 850,000 artifacts recovered from the Foley Square courthouse block tell a rich story about the working-class residents of New York's most notorious early 19th-century slum, recently the subject of a fictional film concerned with the historical conflict between the area's Irish and Italian immigrants.

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

### Underwater Artifacts

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

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

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

One of the most significant war vessel discoveries in recent years was the *H.L. Hunley*, The first submarine in history to sink a ship in military action. Fashioned from a cylindrical iron steam boiler, the Confederate vessel sunk in 1864 after attacking the Union's *Housatonic*.



## Section 106 Compliance: Project Development and Public Participation

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

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

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

### Online Tools for Better Program Management

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

Factors to be considered  
early in the project:

site selection

disposal

acquisition

demolition

changes of use

exterior changes

departure of tenants

building activities

public access

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

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

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

#### **Preservation Desk Guide**

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

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



The 6-volume *Preservation Desk Guide* brings together a comprehensive body of knowledge developed by GSA and serves as a central institutional memory for GSA's substantial portfolio of historic buildings.

Complete sets of the *Preservation Desk Guide* are available in each regional Portfolio Management Office and through each RHPO. A substantial portion of the *Desk Guide* reference and sample documents will go online in 2004, allowing document searches as well as browsing by document type— GSA preservation guidance, GSA sample documents, non-GSA preservation guidance documents.

#### **Preservation Program Web Sites**

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

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

### **Programmatic Agreements for Streamlined Review of Repairs and Alterations**

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

Fortunately, confidence in GSA's stewardship reliability is improving dramatically with the increasing professionalism of regional preservation associates, the new standard RHPO position description, and ADM 1020.02 qualification requirements for preservation staff. In 2004, the Rocky Mountain Region negotiated PAs with SHPOs in Utah and Colorado premised on oversight by a qualified RHPO and professional preservation staff from early planning through project completion and assurance that projects will follow the Secretary of the Interior's Standards and BPP recommendations. These agreements, like those executed by the National Capital and Southeast Sunbelt Regions provide conditional exclusion for routine in-kind repairs and certain alterations when approached in a specific and appropriate manner. In addition, the Utah PA provides conditional exclusions (consistent with the Secretary's Standards) for certain types of lease actions.

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

### **Public Process and Model Agreements for Disposal, Relocation, and Mitigative Interpretation**

Perhaps in response to accelerated implementation of the Portfolio Strategy, as well as lessons learned during GSA's reactivated construction program in the 1990s, the 1999-2004 reporting period has been exceptionally productive in the development of precedent-setting agreements and procedures for protecting historic properties in disposal or adversely affected by major property changes, such as site clearing for new construction or building excavation for seismic retrofit or secure parking. Although inconsistent Section 106 submissions and late initiation of mandated public participation continue to contribute

to project delays, regions have developed a variety of successful models for meaningful and timely public participation. It is also anticipated that increased regional capability stemming from the raised RHPO position standards will improve GSA's Section 106 submission and public participation track record.

### **Disposal**

Three recent projects stand out as models for avoiding or mitigating adverse effects associated with historic building transfers, including providing for long-term preservation oversight. They are the Old U.S. Mint in San Francisco, CA, the Old Post Office and Custom House in St. Louis, MO, and Square 457 (site of Clara Barton's Civil War office) in Washington, DC. The Programmatic Agreement for the Old Mint lays out a process for selecting a new use and developer modeled on the Request for Qualifications and Use developed for the Tariff Building outlease. Both the San Francisco and St. Louis transfer agreements include provisions for third-party review of substantial changes similar to the Section 106 compliance process. A proposed agreement guiding redevelopment of Square 457 would preserve Barton's office in perpetuity, with provisions for public access and interpretation. GSA will hold an easement on the space and retain enforcement responsibility. (See pages 70-73 for detailed accounts of each project.)

### **Historic Building Relocation**

Agreements developed for the Moss Courthouse expansion in Salt Lake City, UT and new federal courthouse in Springfield, MA include provisions for relocating small historic buildings on construction sites to adjoining, privately-owned lots. In both cases, the historic buildings survived as isolated structures on their blocks, so relocation, while considered an adverse effect according to the Secretary's Standards, actually helped to reestablish an appropriate period context for the buildings. (See also Acquisition, page 51).

### **Interpretation**

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

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

Adapt space for new uses while making  
the most of historic architectural features

## SUCCESS STORY

### GENE SNYDER U.S. COURTHOUSE AND CUSTOM HOUSE

GSA reprograms space within its historic buildings to meet the evolving needs of its customers. The best fit occurs when tenants are able to make the most of historic architectural features and minimize the need for costly alterations that compromise historic character. Vacated postal work areas flanking the ceremonial lobby at the Gene Snyder U.S. Courthouse and Custom House in Louisville now house offices for the Social Security Administration and Court Clerks. The high ceilings and generous daylight common to historic postal work areas make them desirable spaces that are easily adapted for contemporary office configurations.

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





### Public Participation

In the 1990s, revisions to the Section 106 implementing regulations diminished the involvement of the ACHP and increased the role of the public. The shift was made to allow the Council to focus its efforts on more strategic involvement in projects of national concern, and to reduce protracted controversy resulting from lack of (or last minute) public involvement. Holding well-organized, and publicized public meetings helps to ensure that GSA meets its compliance responsibilities and creates opportunities for potentially valuable input. Model notices and agendas for public meetings are provided in the *Preservation Desk Guide*.

### Tools and Templates for Better Project Management

Three new, compact guide documents available on the Center Web page have been developed to assist regional associates in seeing Section 106 compliance to successful conclusion:

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

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

A standard leasing and new construction site solicitation clause encouraging agency location in historic areas and historic buildings is available, along with the Real Estate Environmental and Preservation Checklist, on the Center Web page. However, there remains a need to revisit GSA's standard leasing solicitations to provide greater flexibility in meeting agency space requirements. Translating prescriptive requirements, such as minimum column spacing or specific space layouts, into performance standards capturing their intent, such as workspace capacity, privacy, or information access needs, would enable historic buildings to be more competitive.

The project managers workshops and preservation Web sites have helped promote the use of model solicitation and contract documents for better quality design and construction in historic buildings, but these tools are not yet being consistently used in all regions. Most important among these tools are:

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

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

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

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

### General Design Guides

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

### Whole Building Design Guide

The Center for Historic Buildings is a leading contributor to a new comprehensive preservation design resource that benefits federal project teams as well as A/Es engaged in nonfederal projects. The *Whole Building Design Guide* is a comprehensive online tool spearheaded by the National Institute of Building Sciences and developed by and for federal agencies. The intent of the guide is to raise the quality of all federal construction projects by consolidating federal design knowledge and experience to create a broad and organized body of best design practices. Designed to complement GSA's P100 *Federal Facility Standards*, the *Court Design Guide*, and other agency-specific design requirements, the *WBDG* provides best practice approaches addressing virtually every major project category or discipline commonly encountered in federal facility projects, links to relevant documents and sites, and design issue analyses.

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

### P100 Federal Facility Standards and Guidance for Applying Codes and Standards Flexibly

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



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



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

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

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

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

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

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

Computer-generated simulations can be an effective way to help customers visualize reuse scenarios.



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

### Design Development Tools: Charrettes and Simulation

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

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

GSA has recently begun to use computer-generated simulations to demonstrate the positive effects of preservation and restoration. This can be an effective way to help customers visualize a successfully—or unsuccessfully—altered space after restoration. The simulations are best used to show inspiring possibilities rather than to steer customers to a specific design. In San Diego, CA a simulation illustrated a restored facade and lobby of a deteriorated hotel linked to a hypothetical new courthouse. In Minneapolis, MN a simulated restoration is being used to attract new tenants to the vacant 1912 Federal Office Building.

### Technical Preservation Studies, Guidelines, and Design Prototypes

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

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

### **Fire Safety**

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

### **Heating, Ventilating, and Air Conditioning (HVAC)**

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

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

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

### Security and Public Access

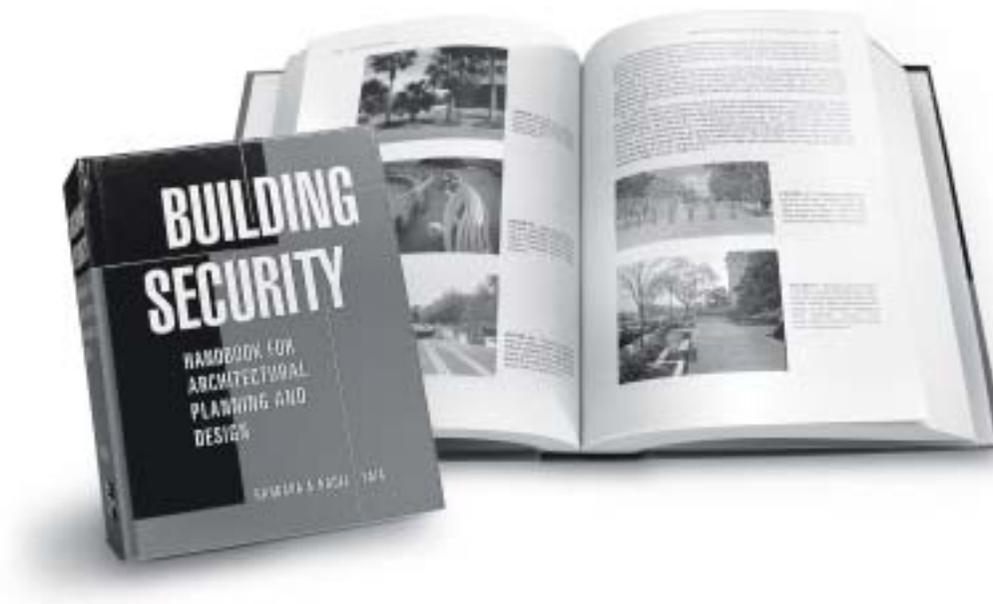
Since the 1995 Oklahoma City bombing, the call for immediate and long-term security improvements has introduced conflicts with federal mandates to protect historic properties. In response, GSA has joined other stewardship agencies to devise preservation-appropriate approaches and is taking the lead in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

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

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

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

Results of the pilot design study were published in the Association for Preservation Technology International's quarterly *Bulletin* in 2004. A compact version of the study will be placed on the Center's



Web page. Model security approaches are also provided in the historic preservation chapter of the *Building Security: Handbook for Architectural Planning and Design*, jointly written by Center and National Park Service staff and published by McGraw Hill in 2004.

#### **Seismic Retrofitting**

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

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

### Buildings Under 50

In response to public controversy surrounding planned alterations to 1960s buildings and subsequent OCA-sponsored discussions between GSA and the design community, in 2003, the Center commissioned a context study to assess GSA's inventory from this period and develop a methodology for evaluating its historic significance. The intent of the study was to examine GSA's 1950s-70s buildings within the context of their time to aid in assessing their overall merit. A context study of this type is generally the first step in evaluating buildings that share common characteristics such as era of construction, style, and purpose. It is the first such study to substantively explore the character of these more recent federal buildings and the changing philosophy of the federal government's public buildings program. *Growth, Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s* was released in October 2003 at the National Preservation Conference.

As anticipated, few buildings proved to be architecturally exceptional, most simply reflecting the era's ideals of efficiency and economy. Federal office buildings during this time also reflect the predominant styles of the day—international, formalism, brutalism, expressionism—but in general are more derivative than precedent setting or unique. These buildings are functionally generic, blurring traditional distinctions between building types such as courthouses and office buildings, as public buildings grew more to resemble commercial offices. Plazas were often integral to the overall designs, but many were never executed due to budget constraints, further reducing the relationship between the buildings and their locales.

Associates and contractors can use the Report's assessment tool to evaluate the significance of these buildings as they near the half-century age threshold for National Register eligibility, identifying buildings requiring special care before major changes are considered. Associates and design teams will be able to evaluate the relative merit of these buildings, anticipate local reaction to proposed modifications, and ensure that changes complement the original design and build on the best qualities each building has to offer.

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

### **First Impressions**

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

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

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

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

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

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

Well-integrated alterations contribute  
to good First Impressions at historic buildings

## SUCCESS STORY

### BYRON G. ROGERS FEDERAL BUILDING AND U.S. COURTHOUSE

In 1999, GSA initiated the First Impressions program to create and maintain attractive, inviting building gateways by eliminating clutter, articulating entrances with landscaping and appropriate wayfinding, and architecturally integrating new lobby furnishings and features. At the Byron G. Rogers Federal Building and U.S. Courthouse in Denver, GSA stepped back to reevaluate the initial First Impressions approach that would have removed a character-defining colonnade. The successful final approach for the lobby extension recognized the original design intent and historic features.

BYRON G. ROGERS FEDERAL BUILDING  
AND U.S. COURTHOUSE  
DENVER, CO, 1965





**Workspace and Circulation**

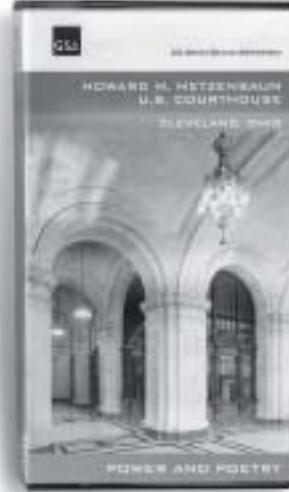
GSA is exploring a variety of model design approaches for meeting the latest workspace requirements while maintaining the integrity of historically significant circulation areas. At the elegant Ariel Rios building in Washington's Federal Triangle, vaulted corridors were preserved and select end corridors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

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

A partially restored central corridor and rehabilitated workspace offer generous daylight and opportunities for collegial interaction to meet the needs of the Office of the Chief Architect in GSA's 1917 Central Office building, originally constructed for the Department of Interior.



CORRIDOR WITHIN OFFICE OF THE CHIEF ARCHITECT, GSA HEADQUARTERS BUILDING, WASHINGTON DC



## Fostering Greater Awareness and Ability: Training and Recognition

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

Top architectural photographers were commissioned to provide quality images for posters and brochures, typically one poster and associated brochure per region each year, for a current total of 48. Regional offices use the posters and brochures to promote GSA's historic building legacy to customers, compliance organizations, preservation advocacy groups, and program staff. The Center is cataloguing the photographs to establish an archival and electronic-access image library for educational, publicity, and security purposes.

These materials are available through Regional Historic Preservation Officers, managers of featured buildings, and the Center. The Government Printing Office has sets of posters available through its online catalog. A compilation of poster images is available in a screensaver on the Center's Web page.

In cooperation with the regions, the Center has undertaken a series of videos profiling architecturally exceptional historic buildings in places of national preservation events, including the Howard M. Metzenbaum U.S. Courthouse in Cleveland, OH; the Byron R. White U.S. Courthouse in Denver, CO; the Pioneer U.S. Courthouse in Portland, OR; and the Gene Snyder U.S. Courthouse and Custom House in Louisville, KY. The Southeast Sunbelt Region is creating a video documenting the adaptive use of Memorial Hall as a federal courthouse in Natchez, MS. Regions have also produced notecards and calendars to reinforce efforts to build recognition of GSA's historic buildings among associates.

Historic Buildings showcased in the poster and brochure series include:

Federal Building and U.S. Courthouse  
Providence, RI

U.S. Custom House  
New Bedford, MA

U.S. Custom House  
Portland, ME

Edward T. Gignoux U.S. Courthouse  
Portland, ME

Alexander Hamilton U.S. Custom House  
New York, NY

Thurgood Marshall U.S. Courthouse  
New York, NY

Michael J. Dillon U.S. Courthouse  
Buffalo, NY

Robert C. McEwen U.S. Custom House  
Ogdensburg, NY

Jose V. Toledo Federal Building  
and U.S. Courthouse  
San Juan, PR

U.S. Custom House  
Baltimore, MD

Owen B. Pickett U.S. Custom House  
Norfolk, VA

Lewis F. Powell, Jr. U.S. Courthouse  
Richmond, VA

U.S. Custom House  
Philadelphia, PA

Federal Building and U.S. Courthouse,  
Savannah, GA

U.S. Custom House  
Savannah, GA

Gene Snyder U.S. Courthouse  
and Custom House  
Louisville, KY

Joel W. Solomon Federal Building  
and U.S. Courthouse  
Chattanooga, TN

Birch Bayh Federal Building  
and U.S. Courthouse  
Indianapolis, IN

Federal Center  
Chicago, IL

Federal Building and U.S. Courthouse  
Milwaukee, WI

Howard M. Metzenbaum U.S. Courthouse  
Cleveland, OH

U.S. Courthouse  
Des Moines, IA

U.S. Courthouse  
Wichita, KS

U.S. Custom House and Post Office  
St. Louis, MO

U.S. Post Office and Courthouse  
Kansas City, MO

U.S. Courthouse  
Santa Fe, NM

U.S. Custom House  
Galveston, TX

Elton B. Mahon U.S. Courthouse  
Fort Worth, TX

U.S. Post Office and Courthouse  
San Antonio, TX

U.S. Custom House  
New Orleans, LA

Byron R. White U.S. Courthouse  
Denver, CO

Ronald N. Davies Federal Building  
and U.S. Courthouse  
Grand Forks, ND

Frank E. Moss U.S. Courthouse  
Salt Lake City, UT

U.S. Courthouse  
Sioux Falls, SD

Richard H. Chambers U.S. Court of Appeals  
Pasadena, CA

U.S. Court of Appeals  
San Francisco, CA

Jacob Weinberger U.S. Courthouse  
San Diego, CA

U.S. Courthouse  
Los Angeles, CA

Pioneer U.S. Courthouse  
Portland, OR

U.S. Custom House  
Portland, OR

Gus J. Solomon U.S. Courthouse  
Portland, OR

U.S. Courthouse at Union Station  
Tacoma, WA

Dwight D. Eisenhower  
Executive Office Buildings  
Washington, DC

U.S. Department of Justice Building  
Washington, DC

U.S. General Services Administration  
Building  
Washington, DC

U.S. Pension Building  
Washington, DC

Andrew W. Mellon Auditorium  
Washington, DC

Robert C. Weaver  
U.S. Department of Housing  
and Urban Development Building  
Washington, DC

Nancy Hanks Center –  
Old Post Office Building  
Washington, DC



### **Advocacy and Education Partnerships**

Between 2000 and 2004, GSA collaborated with a number of non-profit organizations to increase public benefit from GSA's compliance activities:

#### **African Burial Ground, New York, NY**

The Northeast and Caribbean Region cooperated with Howard University and the Schomburg Center for Research in Black Culture to create a respectful and symbolic reinterment ceremony, educational video, and exhibit on an archaeological burial ground discovery that is redefining the nation's understanding of slavery and African culture in colonial America.

#### **Rich's Department Store, Federal Center, Atlanta, GA**

The Southeast Sunbelt Region worked with museum professionals from Atlanta History Center and Georgia State University to develop an exhibit researched, written, fabricated, and installed by graduate students in the University's Heritage Preservation program. The photograph and artifact exhibit on the historic department store is on display at the entrance to the leased building.



RICH'S DEPARTMENT STORE,  
FEDERAL CENTER, ATLANTA, GA

#### **Clara Barton Discovery, Washington, DC**

The National Capital Region partnered with the City Museum of the District of Columbia to develop an innovative program on the discovery of Clara Barton's Civil War office in a 19th-century row house previously owned by GSA. GSA is pursuing an agreement whereby, the museum will interpret and provide public access to the conserved office by linking it to an exhibit at the City Museum a few blocks away.

#### **Jose V. Toledo Federal Building and U.S. Courthouse Expansion, San Juan, PR**

The Northeast and Caribbean Region worked with the Institute for Puerto Rican Culture to develop four interpretive panels on the history of the courthouse's restoration, and recent archaeological recovery efforts, along with two display cases containing artifacts to be on permanent display in the building.

### **GSA Preservation Strategy and Techniques Training**

GSA has undertaken both broad and focused training programs to enhance the stewardship skills of project teams and facilities staff. Training venues such as Project Manager Workshops, Courthouse Project Workshops, and Facilities Management Conferences have provided opportunities to educate project managers, facilities staff, and realty specialists about the importance of early and meaningful Section 106 consultation in the context of their program responsibilities and goals.

The Center also sponsors periodic nationwide compliance training when regulatory or organizational changes have significant impact on GSA activity. On-site regional training for realty specialists in 2000 focused on implementing Executive Order 13006, which requires agencies to give first consideration to locating in historic buildings and districts within central business areas. On-site regional training recently developed through an interagency agreement with the Advisory Council on Historic Preservation focuses on NHPA compliance challenges commonly encountered in GSA projects. The 2004 compliance training includes a specially designed intensive session for upper management.

Center-sponsored biannual training for Regional Historic Preservation Officers includes case study presentations, briefings from business-line leadership and associates on critical issues and program initiatives, intensive Section 106 and 110 compliance workshops, interactive discussion, and solutions exchange on top regional compliance challenges.

Most regional preservation programs also provide general and technical training for portfolio, project development, and facilities management associates. Future RHPO training will include opportunities to share best practices from these regional training programs, allowing an opportunity for new and established RHPOs to exchange lessons learned.

### **GSA's Public Buildings Heritage Award Program**

Created in 1999, the Public Buildings Heritage Awards recognize both large and small rehabilitation design projects in areas such as Architectural Barriers Act compliance, fire safety retrofitting, systems integration, adaptive use of individual spaces, and finish repair and restoration. The intent of these awards, given by the PBS Commissioner, is to instill in project staff the idea that the quality of every project, regardless of size, is important. Highlighting our accomplishments motivates associates and design teams to put in the extra effort that results in better projects and builds GSA's image. To raise the profile of the program, beginning in 2005, the Heritage Awards will be included as a special category in the biennial GSA Design Awards program.

### **Interagency, Professional and Academic Stewardship Programs**

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

### **Federal Training Work Group Executive Briefing Folder**

An interagency task group chaired and staffed by the National Park Service, the Federal Training Work Group was created to assist agencies in developing effective preservation training programs by pooling their knowledge and efforts. Members represent diverse property holding agencies with varying stewardship responsibilities. The group's Executive Briefing Folder, developed to address the particular regulatory information needs of agency upper management, includes summary information about federal preservation regulations and agency responsibilities and an additional folder pocket for inserting agency-specific information. The folders are available from the Federal Preservation Institute.

### **Save America's Treasures**

GSA plays a vital role as a federal partner in the Save America's Treasures Department of the Interior Historic Preservation Fund Grant Program, working with representatives from the White House, the National Trust, the National Park Service, and the National Endowment for the Arts to provide program support to assess proposals for projects involving preservation of nationally significant properties in private or government ownership.<sup>15</sup> The fund is administered by the National Park Service. GSA has been represented on the grant selection panel since 2002.

### **National Preservation Conference**

GSA has been a major sponsor of the National Trust for Historic Preservation's annual preservation conference since 2000. As such, GSA has the opportunity to highlight its ongoing preservation initiatives through conference field sessions and plenary presentations. The PBS Commissioner has represented GSA before the event's national audience as a plenary or keynote speaker. In 2003, Commissioner Moravec reaffirmed GSA's commitment to using and preserving federal historic properties in a presentation entitled "GSA's Portfolio Strategy and Legacy Vision" at the conference. Chief Architect Feiner led a panel session in 2002 "From City Beautiful to 60s Modern: Examining Distinct Decades of Federal Design" and another entitled "Balancing Modernization with Historic Integrity: Keeping Pace while Saving Place" in 2003. GSA sponsors a booth at the conference exhibit showcasing landmark public buildings and stewardship successes.

### **Association for Preservation Technology International Conferences and Symposia**

GSA maintains close collegial relations with professional preservation organizations, particularly the Association for Preservation International (APTI), the principal international group concerned with the advancement of technology related to the preservation of historic buildings, artifacts, and landscapes. Since 1968, APTI has provided a forum for exchanging information about new technologies and approaches for the care and active use of historic buildings and sites. GSA associates have served as board members in APTI, published technical papers in APTI's quarterly *Bulletin*, and presented GSA prototypes and project achievements at annual conferences. In March 2002, GSA hosted an APTI Washington Chapter seminar entitled "New Technology for Recording and Monitoring Historic Buildings." In November 2004, GSA and the National Park Service are partnering with APTI to sponsor a symposium on "Design Excellence and Preservation Standards," to be held at APTI's annual conference in Galveston, TX.



Recapture federal investment in high quality architecture by reinvesting to keep historic public buildings functional and safe

## SUCCESS STORY

### HOWARD M. METZENBAUM U.S. COURTHOUSE

By reinvesting in federally-owned historic buildings, GSA ensures that well-constructed public buildings of high architectural merit can continue to serve a 21st century workforce. Our chief investments are in safety, building systems improvements and exterior maintenance. GSA strives to preserve the qualities that contribute to each building's significance through low intervention repair approaches and selective restoration. The Howard M. Metzenbaum U.S. Courthouse modernization in Cleveland restores ceremonial areas while creating secure queuing space by utilizing an existing courtyard. Previously removed original murals will be reinstated within the newly created entryway.

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



## CONCLUSION

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

Even as federal agencies strive to respond to the Government Accountability Office (GAO) and Congressional criticism for holding underused property at taxpayer expense, GSA's *Legacy Vision* restates the agency's commitment to balancing sound fiscal management with public interest in maintaining the nation's cultural heritage. The *Legacy Vision* also affirms the Public Building Service's commitment to maintaining an appropriate federal presence in hundreds of towns and cities where the government interacts directly with American citizens. In making a commitment to give first preference to using those buildings that best represent America's public building legacy, GSA acknowledges its critical role in shaping the future of the federal presence. Equally important, the *Legacy Vision* conveys a realistic awareness of the need to focus on preserving what's most important.

Despite some tangible successes repositioning highly significant under-performers to better "carry their own weight," there remain endemic viability challenges that may lead to a significant reduction of the historic building inventory, especially among GSA's oldest buildings and smaller historic buildings that are the principal federal presence in many small towns. Not only are the smaller historic buildings unable to achieve the operational and rehabilitation economies of scale that larger buildings do, but they are more likely to be located in remote or depopulating areas where market based rents are insufficient to fund appropriate care and reinvestment. Market based rent rates will continue to constrain reinvestment in landmark federal buildings located within depressed central business areas.

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

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

There are promising counter trends, including a continuing desire among many of GSA's "prestige tenants" to remain in the historic buildings constructed for their use or with which they are strongly associated. Within this group, the most committed to sustaining the federal government's public building legacy are "heritage tenancies," i.e., where agencies continue to occupy buildings constructed specifically for them. Principal heritage tenancies include custom houses, courthouses, and cabinet agency headquarters.

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

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

Beyond the financial obstacles of market based rents and declining occupancies driven by changing demographics, among the greatest challenges to acquisition, leasing, and continued use of historic buildings are prohibitively expensive rehabilitation requirements dictated by contemporary seismic codes and security standards. Commercial return-on-investment criteria requiring every building to "stand on its own" often does not support retention of historic buildings in which compliance costs are driven higher by the need for costlier retrofit technologies and more complex designs to preserve significant historic interiors. Possible solutions include seeking a special appropriation targeting legacy buildings in high seismic-risk zones and refining our business strategy to consider the overall profitability of the legacy building inventory, as well as that of individual buildings, to get a broader picture of its financial health.

This need not amount to letting under-performing buildings “off the hook” where financial accountability is concerned. It could, though, allow strong performers to support continued use of legacy buildings for which there is a federal space need, where appropriate viability measures have been applied to rectify obvious inefficiencies, and specific, insurmountable obstacles to reinvestment—such as the cost of base isolation for seismic protection—still remain.

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

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

A growing preservation issue is the future of GSA's Modern building inventory. As preservation and community advocates express increased interest in these buildings, GSA will face new technical and economic challenges ranging from how to affordably rehabilitate materials and assemblies designed to last 25 years, to the fiscal and philosophical appropriateness of doing so, compared to reinvestment in older, architecturally exceptional buildings. Anticipated challenges include the need to avoid project-stalling controversies by involving community advocates while maintaining a balanced perspective on the relative merit of the buildings in question and current knowledge on intervention options. A starting point for ensuring that the value of these assets is not eroded by the cumulative impact of individual alterations is to develop guidance to assist GSA architects and facilities staff in approaching repair and alteration projects within these buildings contextually, with the goal of maintaining overall design cohesiveness.

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

While a number of chronic preservation compliance deficiencies remain to be conquered, GSA appears to have solutions in hand, or nearly so, for overcoming two of its most persistent compliance shortfalls: management of archaeological records and artifacts, and nomination of qualified historic properties to the National Register. On a broader level, continued organizational culture changes will be required to prevent compliance crises associated with construction projects, particularly with respect to design for new buildings in historic districts and acquisition of encumbered sites where reuse of historic buildings is not an option GSA's tenants will entertain.

Within this context, the recent issuance of Executive Order 13287 *Preserve America*, which calls for periodic federal reporting and increased accountability for the use, condition, and public benefit derived from the federal government's cultural properties, is well timed. Informed by its perspective as a service provider, along with the National Performance Review and a desire to bring the agency into the computer age, GSA has developed an impressive array of automated systems and analytical methods to assess the physical and financial condition of its buildings and to generate information about the inventory as a whole. Important next steps are to better link these information sources and to upgrade existing databases so as to meet the specific reporting requirements of E.O. 13287 more efficiently. The Building Preservation Plan database, for instance, was conceived as a set of easy to access, uniform, updateable preservation planning guides for individual historic buildings, not as a means by which to generate statistics on the historic building inventory as a whole. As a database, however, it has a report generating capability and is being modified to serve both purposes.

With the establishment of the Center for Historic Buildings and the release of GSA's first internally generated, comprehensive stewardship strategy, *Held in Public Trust*, along with this follow up report, a pattern is being established for ongoing self-assessment so that GSA can continue to examine the effectiveness of its stewardship strategy and refocus its efforts as needed. The speed and effectiveness with which these challenges are met will depend on continued communication among agency leadership and project teams with GSA's nationwide preservation staff, continued development of useful guidance tools and online information support, and on compelling and continual preservation advocacy.

## NOTES

- <sup>1</sup> Detailed in the PBS policy paper Integration of A Federal Legacy Vision with GSA's Portfolio Strategy for Restructuring and Reinvesting in the Owned-Inventory, jointly released by the Office of Portfolio Management, Center for Historic Buildings, and PBS Commissioner in 2002.
- <sup>2</sup> 1997 Draft Report of the Planning and Capital Investment Business Process Reengineering (BPR) Team. GSA Office of Portfolio Management.
- <sup>3</sup> Based loosely on OMB 2000 statistical area standards for Census reporting, adjusted for simplicity and to provide additional focus on smaller population areas, that, while not meeting Census thresholds (e.g., 10,000 for Core-based Area) are commonly organized around a town center. Statistical areas in this report are defined as follows: Metropolitan: 500,000+; Small City: 100,000-under 500,000; Towns: 10,000-under 100,000 (large) and 2,000-under 10,000 (small); and Remote: under 2000.
- <sup>4</sup> A majority of these World War II era buildings, historically constructed for military industrial uses such as warship and weapons manufacturing, originally lacked distinction (having been constructed as temporary buildings) or have been substantially altered and do not appear to meet National Register eligibility criteria. Those buildings formally determined ineligible or determined by GSA as not likely to be eligible are excluded from the historic building inventory statistics referenced throughout this report.
- <sup>5</sup> Annual total repair and alterations funding for historic buildings was estimated by adding appropriations for prospectus (BA 55) projects in historic buildings (limited scope, modernization, and Design Excellence Program) and appropriated (BA 54) funding for recurring repairs and alterations below the prospectus threshold, multiplied by a factor of 25%, representing the proportion of the national inventory that historic buildings make up in gross floor area.
- <sup>6</sup> According to capital program data provided on Portfolio Management's Insite pages, 1999 and 2000 capital funding for historic buildings was limited to the National Capital Region headquarters modernizations at IRS, Justice, Interior, and State. This excludes rehabilitation associated with design for courthouse annexes at Brooklyn, Erie, and Gulfport in 1999. The total funding appropriated for these projects (including annex design) was \$163.5 million. By 2003, most buildings receiving capital funding were located outside of the National Capital Region; close to half were buildings outside of the National Capital Region in 2004.
- <sup>7</sup> Confirmed leases identified by available STAR data and survey of Regional Realty Specialists, reported in GSA Historic Building Leasing, Historic Buildings and the Arts Center of Expertise, June 2000.
- <sup>8</sup> The preference allows an additional 10% lease cost, to compensate for the additional expense of conforming to Secretary of Interior Rehabilitation Standards, as required by the NHPA and to comply with NHPA mandates requiring the government to give first consideration to using historic buildings to meet agency space needs.
- <sup>9</sup> Building data for Funds from Operations (FFO), rental rate, vacancy rate, operating expenses, repair needs and building value were provided by the Office of Information Resource Management. Customer Satisfaction scores were supplied by the Office of Business Performance, Business Measures Division.
- <sup>10</sup> Market rental rates and operating expenses were not readily available. FFO has been substituted as the financial performance measure.
- <sup>11</sup> Outleases must be of limited terms, given to compatible tenants, and in the government's financial interest to ensure that the lease does not tax the Federal Building Fund (FBF). They may be used as a temporary holding strategy, provided there is a reasonable likelihood of future federal use.
- <sup>12</sup> "Legacy properties," an internal GSA designation to establish retention and reinvestment priority, include monumental buildings containing ceremonial interior space and other significant historic buildings best representing the Federal public building legacy. Regulatory compliance with preservation laws and directives continues to be triggered by National Register eligibility, as required by law.
- <sup>13</sup> Disposal programs in the New England, Southeast Sunbelt, Greater Southwest, Pacific Rim, Northwest/Arctic and National Capital Regions handle regional disposals and disposal of excessed property in the Northeast and Caribbean, Mid-Atlantic, Great Lakes, Heartland and Rocky Mountain Regions.
- <sup>14</sup> Site-specific challenges included malfunctioning mechanical ventilation and the unavailability of chilled water when the remote building supplying GSA's chilled water was not programmed for cooling. To rectify the chilled water problem, an independent chiller was subsequently installed. A second challenge involved use of building rain leaders to avoid the invasiveness and cost of installing supplemental drainage. Early flooding revealed a need to install valves to prevent backflow during heavy rain. Flooding ceased when the valves were installed.
- <sup>15</sup> Current authority excludes Federal agencies other than the National Park Service from competing for SAT funds.

## Photographs

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Art Becker Photography

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GSA

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Jim Higgins

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"Five Points 1827," lithograph,  
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Sepia wash drawing by R. G.  
Skerrett, 1902, after a painting  
then held by the Confederate  
Memorial Literary Society  
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Courtesy of the Navy Art  
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Tom Bernard

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GSA

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James E. Toner

## GSA's Historic Buildings

**New Engl and Region**

CT, ME, MA, NH, RI, VT

William R. Cotter Federal Building  
135 High Street  
Hartford, CT 06103  
CT0013ZZ BPP, HSR

Richard C. Lee U.S. Courthouse  
Church & Court Streets  
New Haven, CT 06510  
CT0024ZZ BPP, HSR

John W. McCormack  
U.S. Post Office & Courthouse  
Post Office Square  
Boston, MA 02109  
MA0013ZZ BPP, HSR

U.S. Custom House  
37 N. 2nd Street  
New Bedford, MA 02740  
MA0076ZZ BPP, HSR

Harold Donohue  
Federal Building & U.S. Courthouse  
8595 Main Street  
Worcester, MA 01601  
MA0113ZZ BPP

U.S. Border Station  
Milltown  
Calais, ME 04619  
ME0009ZZ

Edward T. Gignoux U.S. Courthouse  
156 Federal Street  
Portland, ME 04111  
ME0034ZZ Partial BPP, HSR

U.S. Custom House  
312 Fore Street  
Portland, ME 04111  
ME0035ZZ Partial BPP, HSR

U.S. Border Station  
Ferry Point  
Calais, ME 04619  
ME0501BC

U.S. Border Station  
State Route 27  
Coburn Gore, ME 04936  
ME0551BE

U.S. Customs Residence  
State Route 27  
Coburn Gore, ME 04936  
ME0552BE

U.S. Immigration Residence  
State Route 27  
Coburn Gore, ME 04936  
ME0553BE

U.S. Border Station  
Boundary Line Road  
Fort Fairfield, ME 04742  
ME0601BF

U.S. Border Station  
State Route 229  
Limestone, ME 04750  
ME0701BL

U.S. Border Station  
U.S. Route 1  
Orient, ME 04471  
ME0751BT

U.S. Border Station Garage  
U.S. Route 1  
Orient, ME 04471  
ME0752BT

Federal Office Building  
719 Main Street  
Laconia, NH 03246  
NH0010ZZ BPP

Federal Building & U.S. Courthouse  
Exchange Place  
Providence, RI 02903  
RI0009ZZ BPP, HSR

Pastore Federal Building  
Exchange Place  
Providence, RI 02903  
RI0010ZZ Partial BPP, HSR

U.S. Border Station  
State Route 102  
Beecher Falls, VT 05902  
VT0002ZZ BPP

U.S. Border Station  
State Route 102  
Canaan, VT 05903  
VT0007ZZ BPP

U.S. Border Station  
State Route 105  
East Richford, VT 05476  
VT0008ZZ BPP

U.S. Border Station  
State Route 139  
Richford, VT 05476  
VT0014ZZ BPP

Federal Building,  
U.S. Custom House & Post Office  
56 S. Main St  
St. Albans, VT 054178  
VT0018ZZ BPP

U.S. Border Station  
U.S. Highway  
Alburg Springs, VT 05440  
VT0551BS BPP

U.S. Border Station  
Main Street  
Beebe Plain, VT 05823  
VT0601BP BPP

U.S. Border Station  
U.S. Route 5  
Derby Line, VT 05830  
VT0651PD BPP

U.S. Border Station  
State Route 108  
West Berkshire, VT 05493  
VT0851BW Partial BPP, HSR

**Northeast and  
Carribbean Region**

NJ (Northern), NY, PR, VI

Federal Office Building  
20 Washington Place  
Newark, NJ 07102  
NJ0056ZZ BPP, HSR

James T. Foley  
U.S. Post Office & Courthouse  
445 Broadway  
Albany, NY 12207  
NY0002ZZ BPP, HSR

Federal Building & U.S. Courthouse  
15 Henry Street  
Binghamton, NY 13902  
NY0016ZZ BPP, HSR

Michael J. Dillon U.S. Courthouse  
68 Court Street  
Buffalo, NY 14202  
NY0026ZZ BPP, HSR

U.S. Border Station  
State Route 37  
Fort Covington, NY 12937  
NY0059ZZ Partial BPP

Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007  
NY0130ZZ BPP, HSR

Alexander Hamilton U.S. Custom House  
1 Bowling Green  
New York, NY 10004  
NY0131ZZ BPP

Federal Building  
Margaret Street & Brinkerhoff  
Plattsburgh, NY 12901  
NY0181ZZ BPP, HSR

U.S. Border Station  
State Route 276  
Rouses Point, NY 12979  
NY0196ZZ Partial

U.S. Border Station  
State Route 9B  
Rouses Point, NY 12979  
NY0197ZZ Partial BPP

U.S. Border Station  
State Route 30  
Trout River, NY 13847  
NY0216ZZ Partial BPP

Alexander Pirnie Federal Building  
10 Broad Street  
Utica, NY 13501  
NY0218ZZ BPP, HSR

U.S. General Post Office  
271 Cadman Plaza, E.  
Brooklyn, NY 11201  
NY0234ZZ BPP

Agricultural Processing Station  
193 Meridian Road  
Champlain, NY 12919  
NY0576CB BPP

U.S. Border Station  
Inspection Building  
State Route 374  
Chateaugay, NY 12920  
NY0586C1 Partial BPP

U.S. Border Station  
Inspection Building  
State Route 22  
Moers, NY 12958  
NY0626M1 BPP

Robert C. McEwan U.S. Custom House  
127 N. Water Street  
Ogdensburg, NY 13669  
NY0651OC BPP, HSR

Jose V. Toledo  
Federal Building & U.S. Courthouse  
Comercio & San Justo  
San Juan, PR 00901  
PR0003ZZ BPP

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### Mid-Atlantic Region

DE, MD, PA, NJ (Southern), VA, WV

Appraisers Stores  
103 S. Gay Street  
Baltimore, MD 21202  
MD0003ZZ BPP

U.S. Custom House  
40 S. Gay Street  
Baltimore, MD 21202  
MD0006ZZ BPP, HSR

Maude R. Toulson Federal Building  
129 E. Main Street  
Salisbury, MD 21801  
MD0033ZZ BPP

AA Main Building  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0551AK BPP

AE Annex Building  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0555AK

Boiler House AG  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0557AK

AH Drophammer Building  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0558AK

Oil House AL  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0559AK

Flammable Storage AS  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0563AK

AW Building  
2800 Eastern Avenue  
Middle River, MD 21220  
MD0564AK

Mitchell H. Cohen  
U.S. Post Office & Courthouse  
401 Market Street  
Camden, NJ 08101  
NJ0015ZZ BPP

Clarkson S. Fisher U.S. Courthouse  
402 E. State Street  
Trenton, NJ 08608  
NJ0088ZZ BPP

Federal Building & U.S. Courthouse  
617 State Street  
Erie, PA 16501-1196  
PA0064ZZ BPP

Robert N.C. Nix  
Federal Building & U.S. Courthouse  
900 Market Street  
Philadelphia, PA 19107  
PA0143ZZ BPP, HSR

U.S. Custom House  
200 Chestnut Street  
Philadelphia, PA 19106  
PA0144ZZ BPP

U.S. Post Office & Courthouse  
700 Grant Street  
Pittsburgh, PA 15219-1906  
PA0158ZZ BPP, HSR

William J. Neal on U.S. Courthouse  
235 N. Washington Avenue  
Scranton, PA 18503  
PA0182ZZ BPP, HSR

Main Library  
3 S. Park Row  
Erie, PA 16501  
PA0644ZZ Partial BPP

C. Bascom Slemper Federal Building  
322 E. Wood Avenue  
Big Stone Gap, VA 24219  
VA0020ZZ BPP

Owen B. Pickett U.S. Custom House  
101 Main Street  
Norfolk, VA 23501  
VA0053ZZ BPP, HSR

Walter E. Hoffman U.S. Courthouse  
600 Granby Street  
Norfolk, VA 23501  
VA0054ZZ BPP, HSR

Lewis F. Powell, Jr. U.S. Courthouse  
1000 E. Main Street  
Richmond, VA 23219  
VA0063ZZ BPP, HSR

Elizabeth Kee Federal Building  
601 Federal Street  
Bluffield, WV 24701  
WV0003ZZ BPP

Forest Service Building  
200 Sycamore Street  
Elkins, WV 26241  
WV0010ZZ

Sidney L. Christie Federal Building  
845 5th Avenue  
Huntington, WV 25701  
WV0016FP BPP, HSR

Federal Building & U.S. Courthouse  
1125 Chapel Street  
Wheeling, WV 26100  
WV0047ZZ BPP

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### Southeast Sunbelt Region

AL, FL, GA, KY, MS, NC, SC, TN

Federal Building & U.S. Courthouse  
1129 Noble Street  
Anniston, AL 36201  
AL0004ZZ

Robert S. Vance  
Federal Building & U.S. Courthouse  
1800 5th Avenue, N.  
Birmingham, AL 35203  
AL0011ZZ BPP, HSR

Federal Building & U.S. Courthouse  
100 W. Troy Street  
Dothan, AL 36301  
AL0019ZZ

Federal Building & U.S. Courthouse  
600 Broad Street  
Gadsden, AL 35901  
AL0028ZZ

U.S. Post Office & Courthouse  
101 Holmes Avenue  
Huntsville, AL 35801  
AL0034ZZ BPP

John A. Campbell U.S. Courthouse  
113 S. Joseph Street  
Mobile, AL 36602  
AL0039AB BPP

Frank M. Johnson, Jr.  
Federal Building & U.S. Courthouse  
15 Lee Street  
Montgomery, AL 36104  
AL0043ZZ BPP

George W. Andrews  
Federal Building & U.S. Courthouse  
701 Avenue A  
Opelika, AL 36801  
AL0046ZZ

Federal Building & U.S. Courthouse  
908 Alabama Avenue  
Selma, AL 36701  
AL0055ZZ BPP

U.S. Post Office,  
Courthouse & Custom House  
301 Simonton Street  
Key West, FL 33040  
FL0019ZZ BPP

Federal Building  
124 S. Tennessee Avenue  
Lakeland, FL 33801  
FL0022ZZ

David W. Dyer  
Federal Building & U.S. Courthouse  
300 N.E. 1st Avenue  
Miami, FL 33101  
FL0029AD BPP, HSR

U.S. Courthouse  
100 N. Palafox Street  
Pensacola, FL 32502  
FL0039ZZ BPP

U.S. Courthouse  
110 E. Park Avenue  
Tallahassee, FL 32301  
FL0049ZZ BPP

U.S. Post Office & Courthouse  
115 Hancock Avenue  
Athens, GA 30601  
GA0005ZZ

Martin Luther King, Jr.  
Federal Building  
77 Forsyth Street  
Atlanta, GA 30303  
GA0007ZZ BPP

Elbert Parr Tuttle  
U.S. Court of Appeals  
56 Forsyth Street  
Atlanta, GA 30303  
GA0008ZZ HSR

U.S. Courthouse  
500 E. Ford Street  
Augusta, GA 20309  
GA0009ZZ BPP

U.S. Post Office & Courthouse  
12th Street & 2nd Avenue  
Columbus, GA 31902  
GA0025ZZ

J. Roy Rowland U.S. Courthouse  
100 N. Franklin Street  
Dublin, GA 31021  
GA0036ZZ

Federal Building & U.S. Courthouse  
126 Washington Street, S.E.  
Gainesville, GA 30501  
GA0044ZZ BPP

William August Boothe  
Federal Building & U.S. Courthouse  
475 Mulberry Street  
Macon, GA 31202  
GA0057ZZ BPP

U.S. Custom House  
1-3 East Bay Street  
Savannah, GA 31402  
GA0076ZZ BPP

Federal Building & U.S. Courthouse  
125-127 Bull Street  
Savannah, GA 31402  
GA0078ZZ BPP

Gnann House  
1 Woodland Drive  
Plains, GA 31780  
GA2637ZZ BPP

William H. Natcher  
Federal Building & U.S. Courthouse  
242 E. Main Street  
Bowling Green, KY 42101  
KY0006ZZ BPP

U.S. Post Office & Courthouse  
101 Barr Street  
Lexington, KY 40507  
KY0042ZZ BPP

Federal Building & U.S. Courthouse  
300 S. Main Street  
London, KY 40741  
KY0043ZZ BPP

Gene Snyder  
U.S. Courthouse & Custom House  
601 W. Broadway  
Louisville, KY 40202  
KY0045ZZ BPP

Federal Building,  
U.S. Post Office & Courthouse  
423 Frederica Street  
Owensboro, KY 42301  
KY0058ZZ BPP

Federal Building & U.S. Courthouse  
501 Broadway  
Paducah, KY 42001  
KY0059ZZ

U.S. Post Office & Courthouse  
102 Main Street  
Pikeville, KY 41501  
KY0062ZZ

James Eastland Federal Building  
245 E. Capitol Street  
Jackson, MS 39205  
MS0031ZZ BPP

Mississippi River Commission Building  
1400 Walnut Street  
Vicksburg, MS 39180  
MS0071ZZ

Federal Building  
241 Sunset Avenue  
Asheboro, NC 27203  
NC0003ZZ

U.S. Courthouse  
100 Otis Street  
Asheville, NC 28801  
NC0005AE BPP

U.S. Post Office & Courthouse  
413-415 Middle Street  
New Bern, NC 28360  
NC0011ZZ

Charles R. Jonas Federal Building  
401 W. Trade Street  
Charlotte, NC 28202  
NC0013ZZ BPP

Federal Building,  
U.S. Courthouse & Post Office  
306 E. Main Street  
Elizabeth City, NC 27909  
NC0020ZZ

F. Richardson Preyer Federal Building,  
U.S. Courthouse & Post Office  
324 W. Market Street  
Greensboro, NC 27401  
NC0028ZZ BPP

Federal Building  
215 S. Evans Street  
Greenville, NC 27834  
NC0029ZZ

Federal Building / Century Station  
U.S. Post Office  
300 Fayetteville Street  
Raleigh, NC 27601  
NC0058ZZ

U.S. Post Office & Courthouse  
200 W. Broad Street  
Statesville, NC 28677  
NC0072ZZ

Alton Lennon Federal Building  
& U.S. Courthouse  
2 Princess Street  
Wilmington, NC 28401  
NC0085ZZ

Charles E. Simons, Jr.  
U.S. Courthouse  
223 W. Park Avenue  
Aiken, SC  
SC0002ZZ

G. Ross Anderson  
Federal Building & U.S. Courthouse  
315 McDuffie Street  
Anderson, SC 29261  
SC0004ZZ

U.S. Custom House  
200 E. Bay Street  
Charleston, SC 29403  
SC0011ZZ BPP

Federal Building & U.S. Courthouse  
81 Broad Street  
Charleston, SC 29201  
SC0012AC BPP, HSR

J. Bratton Davis U.S. Courthouse  
1100 Laurel Street  
Columbia, SC 29201  
SC0018ZZ BPP

C.F. Haynsworth  
Federal Building & U.S. Courthouse  
300 E. Washington Street  
Greenville, SC 29601  
SC0028ZZ BPP

Donald Stuart Russell  
Federal Building & U.S. Courthouse  
201 Magnolia Street  
Spartanburg, SC 29301  
SC0041ZZ

Joel W. Solomon  
Federal Building & U.S. Courthouse  
10th Street & Georgia Avenue  
Chattanooga, TN 37403  
TN0006ZZ BPP

Federal Building  
204 N. 2nd Street  
Clarksville, TN 37040  
TN0007ZZ

Federal Building & U.S. Courthouse  
816 S. Garden Street  
Columbia, TN 38401  
TN0010ZZ

L. Clure Morton  
U.S. Post Office & Courthouse  
9 E. Broad Street  
Cookeville, TN 38501  
TN0011ZZ

Ed Jones  
Federal Building & U.S. Courthouse  
109 S. Highland  
Jackson, TN 38301  
TN0029ZZ

Estes Kefauver Federal Building  
801 Broadway  
Nashville, TN 37203  
TN0052AA Draft BPP

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## Great Lakes Region

IL, IN, MI, MN, OH, WI

U.S. Custom House  
610 S. Canal Street  
Chicago, IL 60607  
IL0032ZZ

Federal Building/Railroad  
Retirement Board  
844 N. Rush Street  
Chicago, IL 92409  
IL0033ZZ BPP

Federal Building  
536 S. Clark Street  
Chicago, IL 60605  
IL0054ZZ BPP

Federal Building & U.S. Courthouse  
201 N. Vermilion Street  
Danville, IL 61832  
IL0059ZZ BPP

Melvin Price U.S. Courthouse  
750 Missouri Avenue  
East St. Louis, IL 62201  
IL0069ES

Federal Building & U.S. Courthouse  
100 N.E. Monroe Street  
Peoria, IL 61602  
IL0154ZZ BPP

Findley Federal Building  
600 E. Monroe Street  
Springfield, IL 62701  
IL0173ZZ BPP

Everett M. Dirksen U.S. Courthouse  
219 S. Dearborn Street  
Chicago, IL 60604  
IL0205ZZ

Loop U.S. Post Office  
211 S. Clark Street  
Chicago, IL 60604  
IL0235FC

John C. Kluczynski Federal Building  
230 S. Dearborn Street  
Chicago, IL 60604  
IL0236FC

E. Ross Adair  
Federal Building & U.S. Courthouse  
1300 W. Harrison Street  
Fort Wayne, IN 46802  
IN0031ZZ BPP

Federal Building & U.S. Courthouse  
507 State Street  
Hammond, IN 46320  
IN0044ZZ

Birch Bayh  
Federal Building & U.S. Courthouse  
46 E. Ohio Street  
Indianapolis, IN 46204  
IN0048ZZ BPP

Charles A. Halleck Federal Building  
4th & Ferry Streets  
Lafayette, IN 47901  
IN0057ZZ BPP

Robert Grant  
Federal Building & U.S. Courthouse  
204 S. Main Street  
South Bend, IN 46601  
IN0096ZZ BPP

Federal Building  
145 Water Street  
Alpena, MI 49707  
MI0055ZZ HSR

Theodore Levin U.S. Courthouse  
231 W. Lafayette Street  
Detroit, MI 48826  
MI0029ZZ BPP, HSR

Federal Building & U.S. Courthouse  
600 Church Street  
Flint, MI 48502  
MI0048ZZ

Federal Building,  
U.S. Post Office & Courthouse  
410 W. Michigan Avenue  
Kalamazoo, MI 49006  
MI0072ZZ HSR

Charles Chamberlain Federal Building  
315 W. Allegan Street  
Lansing, MI 48933  
MI0073ZZ HSR

Federal Building & U.S. Courthouse  
525 Water Street  
Port Huron, MI 48060  
MI0097ZZ BPP

Hart-Dole-Inouye Federal Center  
Building 1  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0501BC BPP, HSR

Hart-Dole-Inouye Federal Center  
Building 1A  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0502BC BPP, HSR

Hart-Dole-Inouye Federal Center  
Building 2  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0503BC BPP, HSR

Hart-Dole-Inouye Federal Center  
Building 2A  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0504BC BPP, HSR

Hart-Dole-Inouye Federal Center  
Building 2B  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0505BC BPP, HSR

BPP: Building Preservation Plan  
HSR: Historic Structure Report

Hart-Dole-Inouye Federal Center  
Building 2C  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0506BC BPP, HSR

Hart-Dole-Inouye Federal Center  
Building 4  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0507BC BPP

Hart-Dole-Inouye Federal Center  
Building 4A  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0508BC BPP

Hart-Dole-Inouye Federal Center  
Building 5  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0509BC BPP

Hart-Dole-Inouye Federal Center  
Building 6  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0510BC BPP

Hart-Dole-Inouye Federal Center  
Building 28  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0524BC BPP

Hart-Dole-Inouye Federal Center  
Building 30  
Champion & Washington Avenue  
Battle Creek, MI 49017  
MI0525BC BPP

Hart-Dole-Inouye Federal Center  
Building 7  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0526BC BPP

Hart-Dole-Inouye Federal Center  
Building 8  
Champion & Washington Avenue  
Battle Creek, MI 49017  
MI0527BC BPP

Hart-Dole-Inouye Federal Center  
Building 20  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0528BC

Hart-Dole-Inouye Federal Center  
Building 22  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0529BC

Hart-Dole-Inouye Federal Center  
Building 23  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0530BC

Hart-Dole-Inouye Federal Center  
Building 24  
74 N. Washington Avenue  
Battle Creek, MI 49017  
MI0531BC

Hart-Dole-Inouye Federal Center  
Building 31  
50 N. Washington Avenue  
Battle Creek, MI 49017  
MI0532BC

Federal Office Building/INS Center  
333 Mt. Elliot Street  
Detroit, MI 48207  
MI0601DI

Federal Building & U.S. Courthouse  
515 W. 1st Street  
Duluth, MN 55802  
MN0015ZZ BPP

U.S. Post Office & Courthouse  
118 S. Mill Street  
Fergus Falls, MN  
MN0021ZZ

Federal Office Building  
212 3rd Avenue, S.  
Minneapolis, MN 55401  
MN0036ZZ BPP, HSR

Federal Building  
720 St. Germain  
St. Cloud, MN 56301  
MN0049ZZ

U.S. Customs & Immigration Station  
Noyes, MN 56740  
MN0521NB

Frank T. Bow Federal Building  
201 Cleveland Avenue  
Canton, OH 44702  
OH0023ZZ

Potter Stewart U.S. Courthouse  
700 E. 5th Street  
Cincinnati, OH 44308  
OH0028CN BPP

Howard M. Metzbaum  
U.S. Courthouse  
201 Superior Avenue, N.E.  
Cleveland, OH 44114  
OH0033ZZ BPP

Joseph P. Kinneary U.S. Courthouse  
85 Marconi Boulevard  
Columbus, OH 43215  
OH0046ZZ BPP

Donald J. Pease Federal Building  
143 W. Liberty Street  
Medina, OH 44256  
OH0100ZZ HSR

U.S. Courthouse & Custom House  
1716 Spielbusch Avenue  
Toledo, OH 43624  
OH0143ZZ BPP

Federal Building & U.S. Courthouse  
500 S. Barstow Commons  
Eau Claire, WI 54701  
WI0016ZZ

Federal Building & U.S. Courthouse  
517 E. Wisconsin Avenue  
Milwaukee, WI 53202  
WI0044ZZ BPP, HSR

Federal Building  
68 S. Stevens  
Rhinelander, WI  
WI0064ZZ

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## Heartland Region

IA, KS, MO, NE

Federal Building & U.S. Courthouse  
101 1st Street, S.E.  
Cedar Rapids, IA 52401  
IA0013ZZ BPP

Federal Office Building  
& U.S. Courthouse  
131 E. 4th Street  
Davenport, IA 52801  
IA0027ZZ BPP

Federal Building & U.S. Courthouse  
316-20 6th Street  
Sioux City, IA 51101  
IA0087ZZ BPP

Building 87, Military Reservation  
Motor Pool  
Chaffee Road  
Des Moines, IA 50303  
IA0504ZZ BPP

U.S. Courthouse  
401 N. Market Street  
Wichita, KS 67201  
KS0070ZZ BPP, HSR

U.S. Courthouse & Post Office  
811 Grand Avenue  
Kansas City, MO 64106  
MO0040ZZ BPP

Old Post Office  
815 Olive Street  
St. Louis, MO 63101  
MO0074ZZ BPP

Robert A. Young Federal Building  
1222 Spruce Street  
St. Louis, MO 63103  
MO0106ZZ Partial BPP

Hardesty Federal Center Building 3  
607 Hardesty  
Kansas City, MO 64124  
MO0505AE BPP

Federal Building  
203 W. 2nd Street  
Grand Island, NE 68801  
NE0018ZZ BPP

Federal Office Building  
106 S. 15th Street  
Omaha, NE 68102  
NE0032ZZ BPP

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## Greater Southwest Region

AR, LA, NM, OK, TX

Isaac C. Parker  
Federal Building & U.S. Courthouse  
30 S. 6th Street  
Ft. Smith, AR 72901  
AR0021ZZ BPP

Richard Sheppard Arnold  
U.S. Post Office & Courthouse  
600 W. Capitol Street  
Little Rock, AR 72201  
AR0030ZZ BPP

Old U.S. Post Office & Court House  
312 W. 2nd Street  
Little Rock, AR 72201  
AR0031ZZ BPP

U.S. Post Office & Courthouse  
500 N. State Line Avenue  
Texarkana, AR 75501  
AR0057ZZ BPP

U.S. Post Office & Courthouse  
515 Murray Street  
Alexandria, LA 71301  
LA0002ZZ BPP

Federal Building & U.S. Courthouse  
707 Florida Avenue  
Baton Rouge, LA 70801  
LA0006BT BPP

Federal Building & U.S. Courthouse  
201 Jackson Street  
Monroe, LA 71201  
LA0029ZZ

U.S. Custom House  
423 Canal Street  
New Orleans, LA 70130  
LA0033ZZ BPP, HSR

F. Edward Hebert Federal Building  
600 S. Maestri Place  
New Orleans, LA 70190  
LA0034ZZ BPP

John Minor Wisdom  
U.S. Court of Appeals  
600 Camp Street  
New Orleans, LA 70130  
LA0035ZZ BPP

U.S. Border Patrol Building 13  
3819 Patterson Road  
New Orleans, LA 70144  
LA0066NE BPP

U.S. Border Patrol Building 1  
3819 Patterson Road  
New Orleans, LA 70144  
LA0811NE BPP

U.S. Border Patrol Building 2  
3819 Patterson Road  
New Orleans, LA 70144  
LA0812NE BPP

U.S. Border Patrol Building 3  
3819 Patterson Road  
New Orleans, LA 70144  
LA0813NE BPP

U.S. Border Patrol Building 4  
3819 Patterson Rd.  
New Orleans, LA 70114  
LA0814NE BPP

Federal Building  
1101 New York Avenue  
Alamogordo, NM 88310  
NM0001ZZ BPP

Federal Building  
114 S. Halagueno  
Carlsbad, NM 882200  
NM0005ZZ BPP

U.S. Courthouse  
Federal Place & Washington Avenue  
Santa Fe, NM 87501  
NM0015ZZ BPP

Federal Building  
123 4th Street, S.W.  
Albuquerque, NM 87101  
NM0501AQ BPP

Federal Building & U.S. Courthouse  
421 Gold Avenue, S.W.  
Albuquerque, NM 87103  
NM0502AQ BPP

Carl Albert  
Federal Building & Courthouse  
301 E. Carl Albert Parkway  
McAlester, OK 74501  
OK0039ZZ BPP

Federal Building & U.S. Courthouse  
101 N. 5th Street  
Muskogee, OK 74401  
OK0041ZZ BPP

U.S. Post Office & Courthouse  
215 Dean A. McGee Avenue  
Oklahoma City, OK 73102  
OK0046CT BPP

Federal Building  
224 S. Boulder Avenue  
Tulsa, OK 74103  
OK0063ZZ Partial BPP

Federal Building & U.S. Courthouse  
410 S.W. 5th Street  
Lawton, OK 73501  
OK0074ZZ BPP

J. Marvin Jones Federal Building  
205 E. 5th Street  
Amarillo, TX 79101  
TX0006ZZ BPP

U.S. Court House  
200 W. 8th Street  
Austin, TX 78701  
TX0012ZZ BPP, HSR

Jack Brooks Federal Building,  
U.S. Post Office & Courthouse  
Willow & Broadway Streets  
Beaumont, TX 77701  
TX0019ZZ BPP

Federal Building (Terminal)  
207 S. Houston  
Dallas, TX 75202  
TX0057ZZ

Federal Building (Santa Fe Building)  
114 Commerce Street  
Dallas, TX 75242  
TX0058DA BPP

U.S. Courthouse  
511 E. San Antonio Avenue  
El Paso, TX 79901  
TX0069ZZ BPP

U.S. Courthouse  
501 W. 10th Street  
Fort Worth, TX 76102  
TX0075ZZ BPP

U.S. Custom House  
20th & Post Office  
Galveston, TX 77550  
TX0080ZZ

U.S. Post Office & Courthouse  
601 Rosenberg Street  
Galveston, TX 77550  
TX0081ZZ HSR

U.S. Custom House  
701 San Jacinto Street  
Houston, TX 77002  
TX0101ZZ BPP

U.S. Border Station  
Convent & Zaragoza  
Laredo, TX 78040  
TX0116CV Partial BPP

U.S. Post Office & Courthouse  
1300 Matamoros  
Laredo, TX 78040  
TX0117ZZ BPP

Ward R. Burke U.S. Courthouse  
104 N. 3rd Street  
Lufkin, TX 75901  
TX0126ZZ BPP

S.B. Hall, Jr.  
Federal Building & U.S. Courthouse  
100 E. Houston Street  
Marshall, TX 75670  
TX0130ZZ

O.C. Fisher  
Federal Building & U.S. Courthouse  
33 E. Twohig  
San Angelo, TX 76901  
TX0163ZZ BPP

U.S. Post Office & Courthouse  
615 E. Houston Street  
San Antonio, TX 78205  
TX0164ZZ BPP

Federal Building,  
U.S. Post Office & Courthouse  
221 W. Ferguson Street  
Tyler, TX 75701  
TX0182TY BPP

Federal Building & U.S. Courthouse  
101 E. Pecan Street  
Sherman, TX 75090  
TX0210ZZ BPP

Federal Center Building 3  
635 S. Main Avenue  
San Antonio, TX 78204  
TX0652SA

Federal Center Building 6  
651 S. Main Avenue  
San Antonio, TX 78204  
TX0655SA

Federal Center Building 12  
651 S. Main Avenue  
San Antonio, TX 78204  
TX0657SA

Federal Center Warehouse 1  
501 W. Felix Street  
Fort Worth, TX 76115  
TX0801FW BPP

Federal Center Warehouse 2  
501 W. Felix Street  
Fort Worth, TX 76115  
TX0802FW BPP

Federal Center Warehouse 3  
501 W. Felix Street  
Fort Worth, TX 76115  
TX0803FW BPP

Federal Center Warehouse 4  
501 W. Felix Street  
Fort Worth, TX 76115  
TX0804FW BPP

Federal Center Building 14  
501 W. Felix Street  
Fort Worth, TX 76115  
TX0809FW

Federal Center Building 13  
501 W. Felix Street  
Fort Worth, TX 76115  
TX0812FW

## Rocky Mountain Region

CO, MT, ND, SD, UT, WY

Federal Building & U.S. Custom House  
721 19th Street  
Denver, CO 80202  
CO0006ZZ BPP, HSR

Byron R. White U.S. Courthouse  
1823 Stout Street  
Denver, CO 80202  
CO0009ZZ BPP

Wayne Aspinall  
Federal Building & U.S. Courthouse  
400 Rood Avenue  
Grand Junction, CO 81501  
CO0018ZZ BPP, HSR

Federal Emergency Management Agency  
Building 710  
W. 6th Avenue & Kipling Street  
Lakewood, CO 80225  
CO0631AA BPP

OCD, Emergency Operations Center  
W. 6th Avenue & Kipling Street  
Lakewood, CO 80225  
CO0656AA BPP

Federal Building & U.S. Courthouse  
400 N. Main Street  
Butte, MT 59701  
MT0004ZZ BPP

Federal Building,  
U.S. Post Office & Courthouse  
200 E. Broadway Street  
Missoula, MT 59801  
MT0017ZZ BPP, HSR

Chief Mountain Border Station  
Administration Building  
State Highway 17  
Babb, MT 59411  
MT0501AD

Piegian Border Station  
Residential Apartments  
U.S. Highway 89  
Babb, MT 59411  
MT0551AE

Federal Building  
304 E. Broadway  
Bismarck, ND 58501  
ND0002ZZ BPP

Federal Building & U.S. Courthouse  
655 1st Avenue, N.  
Fargo, ND 58102  
ND0006ZZ BPP

Ronald N. Davies  
Federal Building & U.S. Courthouse  
102 N. 4th Street  
Grand Forks, ND 58201  
ND0008ZZ BPP, HSR

Bruce M. Van Sickle  
Federal Building & U.S. Courthouse  
100 1st Street, S.W.  
Minot, ND 58701  
ND0014ZZ BPP

U.S. Custom House & Post Office  
125 S. Cavalier Street  
Pembina, ND 58271  
ND0018ZZ

U.S. Border Station  
State Highway 42  
Ambrose, ND 58833  
ND0501AK

U.S. Border Station  
U.S. Highway 52  
Portal, ND 58772  
ND0521AM

U.S. Border Station  
State Highway 30  
St. John, ND 58369  
ND0531AN

U.S. Post Office & Courthouse  
102 4th Avenue, S.E.  
Aberdeen, SD 57401  
SD0001ZZ

Federal Building & U.S. Courthouse  
400 S. Phillips Street  
Sioux Falls, SD 57102  
SD0021ZZ BPP, HSR

U.S. Forest Service Building  
507 25th Street  
Ogden, UT 84401  
UT0010ZZ BPP, HSR

J. Will Robinson Federal Building  
88 W. 100th, N.  
Provo, UT  
UT0014ZZ

Frank E. Moss U.S. Courthouse  
350 S. Main Street  
Salt Lake City, UT 84101  
UT0017ZZ BPP

Ewing T. Kerr  
Federal Building & U.S. Courthouse  
111 Wolcott Street  
Casper, WY 82601  
WY0003ZZ BPP

Federal Office Building  
308 W. 21st Street  
Cheyenne, WY 82001  
WY0004ZZ BPP

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## Pacific Rim Region

AZ, CA, HI, NV

Federal Building & U.S. Post Office  
522 N. Central Avenue  
Phoenix, AZ 85001  
AZ0010ZZ BPP

James A. Walsh U.S. Courthouse  
55 E. Broadway Street  
Tucson, AZ 85701  
AZ0015ZZ BPP, HSR

U.S. Custom House  
International Street & Grand Avenue  
Nogales, AZ 85621  
AZ0551BB

U.S. Border Station Garita 2  
International Street & Morley Avenue  
Nogales, AZ 85621  
AZ0553BB

U.S. Border Station  
International Boundary  
Sasabe, AZ 85633  
AZ0601CC

U.S. Border Station  
Pan American Avenue  
Douglas, AZ 85607  
AZ0611DD

U.S. Border Station  
106 D Street  
Naco, AZ 85620  
AZ0681HH

U.S. Courthouse  
312 N. Spring Street  
Los Angeles, CA 90012  
CA0041ZZ BPP, HSR

Federal Building  
18th & K Streets  
Merced, CA 95340  
CA0051ZZ BPP, HSR

Federal Building  
12th & I Streets  
Modesto, CA 95354  
CA0053ZZ Partial BPP, HSR

Federal Building  
801 I Street  
Sacramento, CA 95818  
CA0083ZZ BPP, HSR

Jacob Weinberger U.S. Courthouse  
325 W. F Street  
San Diego, CA 92101  
CA0088ZZ BPP, HSR

U.S. Immigration Station  
& Appraisers Store  
630 Sansome Street  
San Francisco, CA 94111  
CA0091AA BPP

U.S. Custom House  
555 Battery Street  
San Francisco, CA 94111  
CA0092AA BPP, HSR

Federal Office Building  
50 United Nations Plaza  
San Francisco, CA 94102  
CA0093ZZ BPP, HSR

U.S. Court of Appeals, Ninth Circuit  
99 7th Street  
San Francisco, CA 94107  
CA0096ZZ BPP, HSR

Federal Building  
401 N. San Joaquin  
Stockton, CA 95202  
CA0121ZZ Partial BPP, HSR

U.S. Border Station  
Old Customs Building  
12 Heffernan Avenue  
Calixico, CA 92231  
CA0501BB BPP

Old U.S. Custom House  
801 E. San Ysidro Boulevard  
San Diego, CA 92115  
CA0581GG BPP

U.S. Border Station  
State Highway 188  
Tecate, CA 92080  
CA0801LL BPP

Immigration Inspector's Residence  
State Highway 188  
Tecate, CA 92080  
CA0802LL Partial BPP

Custom Inspector's Residence  
State Highway 188  
Tecate, CA 92080  
CA0803LL Partial BPP

Richard H. Chambers  
U.S. Court of Appeals  
125 S. Grand Avenue  
Pasadena, CA 91105  
CA9551RR BPP, HSR

Federal Building,  
U.S. Post Office & Courthouse  
154 Waianuenue Avenue  
Hilo, HI 96720  
HI0001ZZ BPP

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## Northwest/Arctic Region

AK, ID, OR, WA

Federal Building  
& U.S. Courthouse (Old)  
601 W. 4th Street  
Anchorage, AK 99501  
AK0001ZZ BPP, HSR

Federal Building  
648 Mission Street  
Ketchikan, AK 99901  
AK0005AK BPP

Federal Building  
205 N. 4th Street  
Coeur d'Alene, ID 83814  
ID0008ZZ BPP

U.S. Border Station  
Porthill, ID 83853  
ID0551PB

James A. Redden U.S. Courthouse  
310 W. 6th Street  
Medford, OR 97501  
OR0018ZZ BPP, HSR

Gus J. Solomon U.S. Courthouse  
620 S.W. Main Street  
Portland, OR 97204  
OR0023ZZ BPP, HSR

Pioneer U.S. Courthouse  
520 S.W. Morrison  
Portland, OR 97204  
OR0024ZZ BPP

U.S. Custom House  
220 N.W. 8th Avenue  
Portland, OR 97209  
OR0025ZZ BPP

Federal Building  
511 N.W. Broadway  
Portland, OR 97209  
OR0026ZZ BPP

Federal Building & U.S. Post Office  
104 W. Magnolia Street  
Bellingham, WA 98225  
WA0004ZZ BPP

Federal Building  
138 W. 1st Street  
Port Angeles, WA 98362  
WA0028ZZ BPP

William Kenzo Nakamura U.S.  
Courthouse  
1010 5th Avenue  
Seattle, WA 98104  
WA0035ZZ BPP, HSR

Old Federal Office Building 909 1st Avenue Seattle, WA 98174 WA0036ZZ BPP	James L. Whitten Federal Building U.S. Department of Agriculture 12th Street & Jefferson Drive, S.W. Washington, DC 20250 DC0003ZZ	Ariel Rios Federal Building 12th Street & Pennsylvania Ave., N.W. Washington, DC 20004 DC0028ZZ BPP, HSR
Federal Building (Justice-INS) 815 Airport Way Seattle, WA 98134 WA0037ZZ BPP, HSR	Agriculture (Cotton) Annex 12th & C Streets, S.W. Washington, DC 20024 DC0004ZZ	Nancy Hanks Center/Old Post Office 1100 Pennsylvania Avenue, N.W. Washington, DC 20001 DC0029ZZ HSR
Federal Building & U.S. Post Office W. 904 Riverside Spokane, WA 99201 WA0045ZZ BPP	Agriculture South Building 14th Street & Independence Ave., S.W. Washington, DC 20003 DC0005ZZ Partial BPP, HSR	U.S. Pension Building/ National Building Museum 401 F Street, N.W. Washington, DC 20001 DC0030ZZ Partial BPP, HSR
William O. Douglas Federal Building 25 S. 3rd Street Yakima, WA 98901 WA0053ZZ BPP	Veterans Administration Building 810 Vermont Avenue, N.W. Washington, DC 20420 DC0007ZZ HSR	U.S. Department of the Interior South 1951 Constitution Avenue, N.W. Washington, DC 20009 DC0032ZZ BPP, HSR
U.S. Border Station Curlaw, WA 98859 WA0551FB	Herbert C. Hoover Building U.S. Department of Commerce 14th Street & Constitution Avenue, N.W. Washington, DC 20036 DC0013ZZ HSR	Mary E. Switzer Building 330 C Street, S.W. Washington, DC 20230 DC0033ZZ HSR
U.S. Border Station Laurier, WA 99146 WA0601LB	E. Barrett Prettyman U.S. Courthouse Constitution Avenue & John Marshall Place, N.W. Washington, DC 20001 DC0014ZZ BPP	Wilbur J. Cohen Building 330 Independence Avenue, S.W. Washington, DC 20201 DC0034ZZ Partial BPP, HSR
U.S. Border Station Residence 1 Laurier, WA 99146 WA0602LB	U.S. Court of Military Appeals 450 E Street, N.W. Washington, DC 20001 DC0016ZZ HSR	Dwight D. Eisenhower Executive Office Building 17th Street & Pennsylvania Ave., N.W. Washington, DC 20506 DC0035ZZ BPP, HSR
U.S. Border Station Residence 2 Laurier, WA 99146 WA0603LB	Federal Trade Commission 6th Street & Pennsylvania Avenue, N.W. Washington, DC 20001 DC0019ZZ BPP, HSR	General Post Office (Tariff) 701 E Street, N.W. Washington, DC 20436 DC0036ZZ Partial BPP, HSR
U.S. Border Station Metaline Falls, WA 99153 WA0611MB Partial BPP	U.S. Department of the Interior Building 1849 C Street, N.W. Washington, DC 20240 DC0020ZZ BPP, HSR	President's Guest House/Blair House 1651-1653 Pennsylvania Avenue, N.W. Washington, DC 20006 DC0042ZZ HSR
U.S. Border Station Residence 1 Metaline Falls, WA 99153 WA0612MB	U.S. General Services Administration Building 1800 F Street, N.W. Washington, DC 20405 DC0021ZZ BPP, HSR	Harry S. Truman Building U.S. Department of State 2201 C Street, N.W. Washington, DC 20520 DC0046ZZ BPP, HSR
U.S. Border Station Residence 2 Metaline Falls, WA 99153 WA0613MB Partial BPP	Internal Revenue Service Building 1111 Constitution Avenue, N.W. Washington, DC 20225 DC0022ZZ BPP, HSR	Winder Building 600 17th Street, N.W. Washington, DC 20006 DC0048ZZ HSR
Federal Center South Bureau of Indian Affairs Office 4735 E. Marginal Way Seattle, WA 98134 WA0956KC Partial BPP	Robert F. Kennedy Building U.S. Department of Justice 9th Street & Constitution Avenue, N.W. Washington, DC 20530 DC0023ZZ Partial BPP, HSR	Federal Building (Home Owners' Loan Corporation) 320 1st Street, N.W. Washington, DC 20001 DC0075ZZ HSR
<b>National Capital Region</b> DC (Metro area)	Lafayette Building 811 Vermont Avenue, N.W. Washington, DC 20009 DC0026ZZ BPP	Civil Service Building 1724 F Street, N.W. Washington, DC 20006 DC0078ZZ
Central Heating Plant 325 13th Street, S.W. Washington, DC 20405 DC0001ZZ BPP, HSR		
West Heating Plant 1051 29th Street, N.W. Washington, DC 20007 DC0002ZZ Partial BPP		

Robert C. Weaver Federal Building  
U.S. Department of Housing  
& Urban Development  
451 7th Street, S.W.  
Washington, DC  
DC0092ZZ HSR

Dolley Madison House  
721 Madison Place, N.W.  
Washington, DC 20005  
DC0111AA HSR

Ben O. Taylor House  
723 Madison Place, N.W.  
Washington, DC 20005  
DC0112AA HSR

Cosmos Club  
725 Madison Place, N.W.  
Washington, DC 20005  
DC0113AA HSR

U.S. Tax Court  
400 2nd Street, N.W.  
Washington, DC  
DC0114ZZ HSR

Hubert H. Humphrey Building  
U.S. Department of Health  
& Human Services  
200 Independence Avenue, S.W.  
Washington, DC  
DC0115ZZ

Trowbridge House  
708 Jackson Place, N.W.  
Washington, DC 20006  
DC0117AA

Rathbone House  
712 Jackson Place, N.W.  
Washington, DC 20006  
DC0118AA

Mary Jessup Blair House  
716 Jackson Place, N.W.  
Washington, DC 20006  
DC0119AA

Jackson Place Complex  
718 Jackson Place, N.W.  
Washington, DC 20006  
DC0120AA

Jackson Place Complex  
722 Jackson Place, N.W.  
Washington, DC 20006  
DC0121AA

Jackson Place Complex  
726 Jackson Place, N.W.  
Washington, DC 20006  
DC0122AA

Lawrence G. O'Toole House  
730 Jackson Place, N.W.  
Washington, DC 20006  
DC0123AA

Charles Carroll Glover House  
734 Jackson Place, N.W.  
Washington, DC 20006  
DC0124AA

Cornelia Knower Marcy House  
736 Jackson Place, N.W.  
Washington, DC 20006  
DC0125AA

Jackson Place Complex  
740 Jackson Place, N.W.  
Washington, DC 20006  
DC0126AA

Jackson Place Complex  
744 Jackson Place, N.W.  
Washington, DC 20006  
DC0127AA

Sidney Yates (Auditors Main) Building  
14th Street & Independence Avenue, S.W.  
Washington, DC 20024  
DC0501BC HSR

Auditors West Building (Annex 3)  
15th Street & Independence Avenue, S.W.  
Washington, DC 20003  
DC0504BC HSR

Interstate Commerce  
Commission Building  
12th Street & Constitution Avenue, N.W.  
Washington, DC 20423  
DC0521AB Partial BPP, HSR

U.S. Customs Service Building  
14th Street & Constitution Avenue, N.W.  
Washington, DC 20001  
DC0522AB Partial BPP, HSR

Andrew W. Mellon Auditorium  
14th Street & Constitution Avenue, N.W.  
Washington, DC 20001  
DC0523AB Partial BPP, HSR

Central Building  
2430 E Street, N.W.  
Washington, DC 20037  
DC0531AC Partial BPP

East Building  
2430 E Street, N.W.  
Washington, DC 20037  
DC0532AC

South Building  
2430 E Street, N.W.  
Washington, DC 20037  
DC0533AC

Potomac Annex 1  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0591BE HSR

Potomac Annex 2  
(Old Naval Observatory)  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0592BE HSR

Potomac Annex 3  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0593BE HSR

Potomac Annex 4  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0594BE HSR

Potomac Annex 5  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0595BE HSR

Potomac Annex 6  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0596BE HSR

Potomac Annex 7  
23rd & E Streets, N.W.  
Washington, DC 20372  
DC0597BE HSR

Navy Yard 74  
4th & M Streets, S.E.  
Washington, DC 20370  
DC0631AE

Navy Yard 160  
4th & M Streets, S.E.  
Washington, DC 20370  
DC0641AE

Navy Yard 167  
4th & M Streets, S.E.  
Washington, DC 20370  
DC0642AE

Navy Yard 173  
4th & M Streets, S.E.  
Washington, DC 20370  
DC0643AE

Navy Yard 197  
4th & M Streets, S.E.  
Washington, DC 20370  
DC0646AE

NYA Building 202  
4th & M Streets, S.E.  
Washington, DC 20370  
DC0648AE Partial BPP

Federal Building  
& U.S. Post Office  
2 W. Montgomery Avenue  
Rockville, MD 20800  
MD0032ZZ

Suit and House  
4510 Silver Hill Road  
Suitland, MD 20028  
MD0070AG

Martin Bostetter  
U.S. Post Office & Courthouse  
200 S. Washington Street  
Alexandria, VA 22309  
VA0003ZZ HSR

BPP: Building Preservation Plan  
HSR: Historic Structure Report

## ADM 1020.02 Procedures for Historic Properties

ADM 1020.02 is the principal GSA policy implementing the National Historic Preservation Act of 1966 (NHPA), as amended, and related laws, orders, and regulations. Major revisions issued in October, 2003 brought GSA preservation policy, first established by the ADM in 1982, in accordance with current laws, regulations, and professional standards.

The new ADM institutionalizes best practices that have proven successful for GSA, with step-by-step compliance procedures, guidance, and resources addressing the range of GSA activities affecting historic buildings and other cultural property, including archaeological and underwater artifacts as well as buildings. It establishes professional qualification standards for GSA associates involved in compliance activities and details the roles and responsibilities of PBS leadership, Preservation Officers, and regional programs, to ensure access by GSA associates to needed information and professional support, to eliminate redundant effort, and to minimize litigation risk. In compliance with NHPA Section 110 and Executive Order 13287, building-specific and inventory wide preservation planning requirements are also detailed, including planning and consultation associated with long-term leases of historic property.

## GSA ORDER

Subject: Procedures for historic properties

1. **Purpose.** This Order transmits procedures for complying with Federal regulations for the use, protection and enhancement of historic and cultural properties.
2. **Cancellation.** ADM 1020.1, dated August 20, 1982, and PBS P 1022.1, dated March 2, 1981, are canceled.
3. **Background.** The National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470 et seq.), Executive Order 11593, Executive Order 13006, and Executive Order 13287 direct all Federal agencies to:
  - a. Administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations;
  - b. Initiate measures necessary to direct their policies, plans and programs in such a way that Federally-owned sites, structures and objects of historical, architectural or archeological significance are preserved, restored and maintained for the inspiration and benefit of the people;
  - c. Institute Federal plans and programs that contribute to the preservation and enhancement of non-Federally-owned sites, structures and objects of historical, architectural or archeological significance;
  - d. Initiate procedures to promote the viability and use of historic properties available to the agency, promote location of Federal agencies in historic buildings and historic districts in central business areas and overcome barriers to the use of historic properties;
  - e. Locate, inventory and nominate to the Secretary of the Interior all sites, buildings, districts, and objects under their jurisdiction or control that appear to qualify for listing on the National Register of Historic Places;
  - f. Exercise caution during the interim period until inventories and evaluations required by section 3.e, above, are completed so that any Federally-owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered without the benefit of appropriate consideration and procedures for external review and public participation provided under Federal law. Any questionable actions shall be referred to the Secretary of the Interior for an opinion regarding the property's eligibility for inclusion in the National Register of Historic Places;
  - g. Initiate measures and procedures to provide for the continued utility and appropriate care of Federally-owned historic properties and non-Federally-owned historic properties that GSA has an opportunity to lease or acquire, in accordance with the professional standards prescribed by the Secretary of the Interior; and
  - h. Establish procedures to monitor and report on the condition and use of historic properties under GSA control and to report annually on archeological activity associated with GSA construction projects.
4. **Applicability.** This Order applies to all GSA programs, activities and actions that could affect historic and cultural properties. This Order is for guidance of regional historic preservation officers and all other GSA personnel engaged in activities affecting historic properties.
5. **Implementation.** The GSA Federal Preservation Officer is responsible for coordinating with the Heads of Public Buildings Service Staff and Regional Offices to develop plans and procedures for implementing this Order, including measurements and assessment methods for monitoring GSA's progress in meeting its stewardship goals within the framework of GSA business goals and practices. The Head of each Service, Staff and Regional Office shall establish responsibilities within their respective Service, Staff and Regional office consistent with those established by this Order.

Stephen A. Perry  
Administrator

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## Project Documentation Template for Section 106 Compliance

### Preservation Report Format

8 1/2" X 11" narrative report, with captioned photographs showing existing conditions, keyed to a location plan(s) showing photo orientation, and drawings of each preservation design solutions, reduced to 8 1/2" X 11" and bound into report, or, if not legible at 8 1/2" X 11", 11" X 17" foldout or placed in cover pocket.

### Cover

Building name, Address, Project title, Project Control Number, Author (Preservation Architect), Preservation Architect's Signature, and Date of Submission.

### Executive Summary

A. Scope and purpose of project

B. Individuals and groups involved: A/E firm, Preservation Consultant, GSA Project Officer, Building Manager, GSA Regional Preservation Officer or Preservation Program staff reviewer.

### Site Conditions

A. Building and project location

B. Building size, configuration, materials, conditions.

Include captioned photographs showing existing site and building conditions at each affected area

### Preservation Design Issues

Explain solutions explored, how resolved and why, such as (not inclusive):

A. Locating new work/installation: visibility, protection of ornamental finishes, cost concerns

B. Design of new work/installation: address compatibility with existing original materials, research on original design (if original materials non-extant), materials/finishes chosen

C. Method of supporting new work/installation

D. Preservation and protection of historic materials

Include reduced project drawings of site plan, elevations, sections, and details.

For work on historic building, include restoration specifications for work requiring restoration specialists; competency of bidder requirements (Sections 00120 and 009[00]).

### Effects

Summarize and effects the project will have on the building's architecturally significant qualities. If there are unavoidable adverse affects, explain measures proposed to mitigate the negative impact of changes.

## Integration of a Federal Legacy Vision with GSA's Portfolio Strategy for Restructuring and Reinvesting in the Owned-Inventory

Issued August 2002

### Restructuring the Owned Inventory

Faced with insufficient capital to maintain its existing inventory, GSA is undertaking a comprehensive review of its public buildings to best align the portfolio with its mission. Known as *The Portfolio Strategy for Restructuring and Reinvesting in the Owned Inventory*, this initiative will restructure the owned portfolio to consist primarily of strong income-producing properties generating sufficient funds to meet their own capital reinvestment needs. The ultimate outcome is to provide quality workplaces, increase customer satisfaction, and enhance the asset value of our real estate portfolio for the benefit of the taxpayer.

### Stewardship to Preserve Historic Buildings

Along with fiduciary responsibilities driving the portfolio restructuring initiative, GSA has a significant stewardship responsibility to preserve historic buildings and legal obligations under the National Historic Preservation Act (NHPA) and Executive Order 13006. Both the law and Executive Order call on the federal government to choose historic buildings first and to make every effort to put historic buildings to government use and to keep them viable.

Under NHPA, "historic buildings" are those buildings that meet the criteria for listing in the National Register of Historic Places. Age (50 years or older), along with architectural and historic significance, is the primary criterion. NHPA gives equal consideration to properties that have already been included in the National Register as well as those that have not been included, but meet the National Register criteria.

### GSA-Owned Portfolio Facts

- Over 1700 buildings.
- Over \$6 billion in repair and alteration needs. (IRIS)
- 5-year average annual capital reinvestment budget of \$570 million.
- 570 buildings are non-performing.
- 123 buildings are under-performing.
- About 800 buildings are over 50-years old.
- 436 buildings meet basic National Register eligibility criteria.
- 223 buildings are listed on the National Register.
- 33 buildings are National Historic Landmarks, 11 are individually listed.
- About 250 buildings are considered monumental or legacy buildings.

### A Federal Legacy Vision

Although 436 buildings are subject to special consideration under NHPA, not all buildings warrant the same amount of investment and stewardship effort. Priority should be given to the most significant buildings. Of the 436 historic buildings in our inventory, about 250 are considered monumental or legacy buildings designed to serve a symbolic and ceremonial, as well as functional, purpose for the government.

## Integration of a Federal Legacy Vision with Restructuring the Owned Portfolio

Both GSA's portfolio restructuring initiative and its stewardship responsibilities must be performed in an integrated fashion. Given the constraints on capital, it is clear that strategic use of limited funds requires GSA to make choices that will benefit some properties more than others.

The Restructuring Initiative involves reviewing and categorizing buildings as performing, under-performing, and non-performing using quantitative measurement methods. Qualitative criteria or less tangible values (like historic or architectural significance) are not considered at this point. Non-performing and under-performing buildings are placed on a watchlist. Each watchlisted-building will then be examined and a workout strategy selected.

At the point in time when a strategy is developed for a non- or under-performing building, intangible values, such as stewardship and legacy principles come into clear focus and influence decision-making. *Strategies must be explored to ensure that GSA's historic buildings are positioned to be the strongest financial performers possible.*

Asset-specific strategies, addressing the asset's financial condition, market conditions, customer needs, and hold period, have been drafted and captured in Asset Business Plans. Asset Business Teams should partner with Historic Preservation Offices to refine these strategies, pursue reuse, and ensure that GSA's historic buildings are given the priority required under NHPA. Asset Business Plans and asset-specific strategies should be developed in context of Local Portfolio Plans. Specific considerations include:

- **Maintenance and Repair.** Asset Business Teams should monitor cleaning, maintenance, and utility costs at GSA-owned historic buildings to ensure optimum operating

efficiency. Minor repairs should be completed in a timely way to minimize deterioration and the need for more costly future investments.

- **ROI Pricing.** Asset Business Teams should reassess the pricing structure to determine if Return on Investment (ROI) pricing will change the financial performance of the building. This must be done collaboratively with the customer and using the Office of Management and Budget-approved methodology. ROI pricing can be considered for modernization projects as well.

- **Marketing to Agencies.** Giving first preference to GSA-owned historic buildings, Asset Business Teams should determine whether any vacancy can be recovered via marketing to other federal agencies. Housing solutions that favor historic buildings need to be sold to customers.

- **Supplementing Predominantly Federal Use With Out-leasing.** Historic buildings with a continuing need to house federal tenants, can be supplemented with outleases to improve financial standing. Outleasing is not appropriate for all buildings, such as buildings where a federal presence is no longer needed in the community. However, it can be a valuable tool to improve financial viability, provided that the outlease terms are fixed and compatible tenants are found. Outleasing can also be used as a short-term holding tool.

- **Conveyance to Financially Positioned Stewards.** While the goal is to restructure the owned-portfolio to consist primarily of strong income-producing properties, GSA acknowledges that it will inevitably need to retain a limited number of buildings at the financial fringe. It is envisioned that this limited number will consist primarily of legacy properties. That said, GSA's financial constraints need not impair its stewardship responsibilities. Donation or conveyance to a responsible steward who is better positioned than GSA to devote additional resources to preserve the building can be sought.



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