



*Preserving America's Heritage*

# CASE DIGEST: SECTION 106 IN ACTION



ADVISORY COUNCIL ON HISTORIC PRESERVATION

SPRING 2012

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

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

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

This report is available online at [www.achp.gov/casedigest](http://www.achp.gov/casedigest)

# TABLE OF CONTENTS

|  |    |
|--|----|
| <b>About this Report</b> .....   | 2  |
| <b>Colorado:</b> New Case: Rehabilitation of Wayne N. Aspinall Federal Building.....         | 3  |
| <b>District of Columbia:</b> Case Update: Dwight D. Eisenhower Memorial Plans.....           | 5  |
| <b>District of Columbia:</b> Case Update: Adaptive Use of the St. Elizabeths NHL.....        | 7  |
| <b>Massachusetts:</b> Closed Case: St. Joseph’s Parish Conversion to Affordable Housing..... | 9  |
| <b>Multi-State:</b> New Case: Atlantic Wind Energy Initiative.....                           | 10 |
| <b>New Mexico:</b> Closed Case: Taos Regional Airport Expansion Plan.....                    | 11 |
| <b>New York:</b> New Case: Tappan Zee Hudson River Crossing Project.....                     | 13 |
| <b>Ohio:</b> Ongoing Case: Mitigation of Adverse Effects to Ore Dock.....                    | 15 |
| <b>Tennessee:</b> Ongoing Case: Memphis National Cemetery Building Upgrades.....             | 17 |
| <b>Washington:</b> Closed Case: Statewide Agreement for Federal-Aid Highway Projects.....    | 18 |

Cover: Taos Pueblo in New Mexico was the focus of concerns regarding potential adverse effects caused by airport operations during a longstanding and complex Section 106 case. (photo courtesy Blythe Semmer)

## ABOUT THIS REPORT

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

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

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

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

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

# COLORADO

**Project:** New Case: Rehabilitation and Modernization of the Wayne N. Aspinall Federal Building and U.S. Courthouse

**Agencies:** U.S. General Services Administration

**Contact:** Kirsten Kulis [kkulis@achp.gov](mailto:kkulis@achp.gov)

The General Services Administration is transforming a 1918 post office and courthouse into a LEED Platinum “net-zero” energy efficient building by using a design-build project delivery method and American Recovery and Reinvestment Act funds. The long-term viability of the historic property should be sustainable through unprecedented operational savings.

Built in 1918, the Grand Junction Post Office and Courthouse was designed in the Second Renaissance Revival Style under the direction of James Wetmore, Acting Supervising Architect, Department of the Treasury. In 1939, a complementary extension was completed, doubling the size of the building.

When the U.S. Postal Service vacated the building in 1965, the first floor post office area and elevator lobbies were heavily modified. Heating, ventilation, and air conditioning improvements were made also. In 1972, the building was renamed after the late former Congressman Wayne N. Aspinall (Aspinall building). The building was listed in the National Register of Historic Places in 1980.

The Aspinall building now houses offices of the General Services Administration (GSA), Federal Bureau of Investigation, U.S. Attorneys, Internal Revenue Service, U.S. Army Corps of Engineers, U.S. Probation and Pretrial System, U.S. Marshals Service, U.S. District Court, and U.S. Senator Mark Udall.

In January 2010, GSA was given \$15 million in American Recovery and Reinvestment Act (ARRA) funds to rehabilitate remaining original spaces to bring the building into compliance with Architectural Barriers Accessibility Act (ABAA) and fire and life safety standards, and to modernize building infrastructure.



“The characteristics of the building itself – like its large windows and original high ceilings – have made it more feasible for net zero (energy use),” according to Jason Seilcken, GSA’s project manager. (photo courtesy GSA)

When responses to GSA’s initial solicitation indicated that the project could achieve Leadership in Energy and Environmental Design (LEED) Platinum, the highest certification level offered by the U.S. Green Building Council, GSA further challenged select bidders to develop schemes to achieve “net-zero” energy performance. A relatively new concept that reaches beyond LEED, net-zero performance buildings utilize sustainable technology to produce as much (or more) energy than they would normally consume.

The bidders determined that the building could achieve both LEED Platinum certification and net-zero performance by utilizing interior storm windows, dozens of on-site geothermal wells, photovoltaic (PV) panels, and increased insulation. Eager to show the building’s sustainable features, the GSA Source Selection Evaluation Board (SSEB) selected a bidder that also proposed a PV canopy that covered the entire roof.

GSA’s Regional Historic Preservation Officer (RHPO) participated in the SSEB effort, and was impressed with the bidder’s interior renderings depicting a sensitive rehabilitation of character-defining spaces. However, the RHPO determined that the PV canopy posed an adverse effect.

ARRA funding requirements called for project

completion in 2015. To meet project goals and requirements, GSA elected to commence construction in March 2011 via a design-build contract. This fast-track project delivery method, regularly employed in the private sector, has become popular among federal agencies.

Under the traditional design-bid-build project delivery method, an architect is hired to develop a design, a contractor is hired based on its bid on that design, and construction occurs in accordance with the design (except for occasional change orders). Under the design-build method, a contractor is hired, and then hires an architect to develop a design; construction occurs in parallel with design refinement. For design-build, agencies contract and coordinate only with the contractor, who is responsible for both design and construction.

There is often ample time for Section 106 consultation during the first stage of the design-bid-build method. However, design-build compliance challenges can arise when contractors are hired based on solicitations that do not specify adherence to the Secretary of the Interior's Standards (Standards), when consultation does not adequately consider alternatives early on, and when qualified agency personnel are not integrated into ongoing design refinement.

Given GSA's commitment to preservation, its initial solicitation for the Aspinall building included rehabilitation in compliance with the Standards. In addition, a peer with historic preservation expertise, contracted through GSA's Design Excellence program, accompanied the qualified RHPO to SSEB reviews. The RHPO alerted the Colorado State Historic Preservation Office (SHPO), the ACHP, and consulting parties—including the City of Grand Junction Historic Preservation Board—of GSA's determination of adverse effects in a timely manner.

With singular support from the SHPO, consultation occurred expediently, but in keeping with regulations. A Memorandum of Agreement (MOA), executed in spring 2011 among GSA, the ACHP, and the SHPO, included baseline approved concept drawings and renderings as attachments. They depicted a smaller PV canopy; due to consultation and input from GSA's regional and national preservation programs, GSA



This historic photo is the basis of design for the staircase rehabilitation. (photo courtesy GSA)

did a further analysis and determined that a different combination of green technologies could achieve the targeted performance goals. Thereafter, consultation focused on a limited set of adverse effects, managed by the RHPO, who regularly attended meetings with the contractor and coordinated with the SHPO in accordance with the MOA.

Construction at the Aspinall building is ongoing. The postal lobby and elevator lobbies are being rehabilitated, hardwood floors have been refurbished, and a historic mural is being restored and reinstalled in a suitable publicly accessible location. GSA also is reopening a walled-off staircase from the postal lobby to the intact historic courtroom area. Though minimized in the revised design, the PV canopy remains visible from the rear of the building and from a distance. Due to security concerns and the building's raised plinth, GSA also encountered challenges associated with the placement and design of ABAA ramps, but arrived at a solution GSA considers as reversible.

Rehabilitation and modernization is slated to be complete in January 2013. By achieving operational savings, GSA will ensure the long-term viability of this historic building. As Congressman Aspinall was an ardent supporter of energy self-reliance policy, it is fitting that his namesake building is slated to become the first net-zero federal building on the National Register.

For more information: [www.gsa.gov/historicbuildings](http://www.gsa.gov/historicbuildings)



# DISTRICT OF COLUMBIA

**Project:** Case Update: Eisenhower Memorial Plans

**Agencies:** National Park Service

**Contact:** Katry Harris kharris@achp.gov

The Memorandum of Agreement for the establishment of the national memorial to Dwight D. Eisenhower was executed on March 1, 2012. If changes to the memorial's design or other major elements of the proposal are made to address public controversy or concern, the National Park Service and National Capital Planning Commission will reinstate consultation and consider amendments to the agreement.

In the winter 2012 *Case Digest*, the ACHP reported on the complex design proposal and Section 106 consultation regarding the proposed establishment of a national memorial to Dwight D. Eisenhower. In the article, the ACHP also highlighted the multiple federal approvals required for the proposal to go forward.

At that writing, only the Commission of Fine Arts (CFA) had approved the design which includes creating a new "square" along Maryland Avenue and construction of 72-foot-high columns supporting a metal "tapestry" depicting Eisenhower's boyhood home in Abilene, Kansas. Other elements of the design include one-story-high "blocks" with images of Eisenhower as Supreme Commander of Allied Forces in Europe in World War II and as the 34th President of the United States in bas relief. Between the two blocks, the design proposes a statue of Eisenhower as a young boy.

Since that writing, the National Park Service (NPS), National Capital Planning Commission (NCPC), the State Historic Preservation Office (SHPO) of the District of Columbia, the Eisenhower Memorial Commission, and the ACHP executed a Memorandum of Agreement (MOA) for the undertaking. The agreement acknowledges the undertaking's direct adverse effects to the L'Enfant Plan of the City of Washington—a historic property



Artist concept of the new memorial (courtesy NPS)

listed on the National Register of Historic Places—and the designed landscape of the Department of Education Building, which has been determined eligible for the National Register of Historic Places. It also recognizes the visual adverse effects to the setting of surrounding historic buildings, some of which were built during Eisenhower's presidency. The agreement assigns responsibilities to the NPS and NCPC to provide the consulting parties with an opportunity for continued design review and minimization of adverse effects. It includes mitigation measures that will inform visitors to the site of the memorial about the historic context for the site and its relationship to Eisenhower. It provides for NCPC and the DC SHPO to update the existing documentation regarding the L'Enfant Plan of Washington, expand it to include the McMillan Plan, and submit it for consideration as a National Historic Landmark.

The NPS made its Environmental Assessment for the memorial, required under the National Environmental Policy Act (NEPA), available for public comment in autumn 2011. With the Section 106 agreement in hand, the NPS made its Finding of No Significant Impact, concluding its NEPA review, on March 6, 2012. The NCPC's approval of the preliminary design is the last approval needed before NPS can authorize the Eisenhower Memorial Commission to proceed with the proposal. The proposal was scheduled to be considered by NCPC at its meeting on April 12, 2012, but was indefinitely postponed at the Eisenhower Memorial Commission's request.

With this important approval yet to be obtained, some high-profile opponents of the project have urged these federal agencies to redesign the memorial and restart the process. On March 20, 2012, the

House Subcommittee on National Parks, Forests and Public Lands held an oversight hearing on the proposed Dwight D. Eisenhower Memorial. According to the Subcommittee's Press Release (available at <http://naturalresources.house.gov/Calendar/EventSingle.aspx?EventID=283094>), Susan Eisenhower, granddaughter of President Eisenhower, testified on behalf of the Eisenhower family. She expressed their concerns about the development of the Eisenhower Memorial, both in the architect selection process and the resulting design and concept: "Eisenhower's professional assignments carried none of the romantic notion that is embodied in the current memorial concept and design. He was the person tapped to end the horrors of a Nazi-occupied Europe and later to lead the United States and her allies to halt communist aggression and avoid nuclear Armageddon. The man we celebrate is not a dreamy boy, but a real man who faced unthinkable choices, took personal responsibility and did his duty—with modesty and humanity."

In addition to the concerns of the Eisenhower family, others testified that the process by which the architect was selected biased the selection toward a large, experienced architectural firm instead of the architect with the best design for the memorial. Another controversy identified through testimony is the amount of federal funding appropriated for the project. The Eisenhower Memorial Commission estimated the costs to be \$112.5 million, and the Commission has requested 80 percent federal funding, or \$90 million.

The Eisenhower Memorial Commission included with its written testimony a letter from architect Frank Gehry indicating a willingness to work with the Eisenhower family to address their concerns with the present design.

As of the *Case Digest* publication, it is not known whether Congress will direct or advise NPS and the Eisenhower Memorial Commission to review or restart the design process for the memorial or whether either party would do so on its own initiative. Refinements of the design which do not substantively deviate from the current preliminary design will be provided to the consulting parties for review and comment in accordance with the Section 106 agreement. However, substantive changes, such as the elimination or change in scale of the columns and tapestry, would trigger

renewed Section 106 consultation to determine whether the agreement might need to be amended to address changes to the anticipated effects on historic properties.

For more information: [www.achp.gov/docs/CaseDigestWinter2012.pdf](http://www.achp.gov/docs/CaseDigestWinter2012.pdf)



# DISTRICT OF COLUMBIA

**Project:** Case Update: Adaptive Use of the St. Elizabeths National Historic Landmark

**Agencies:** U.S. General Services Administration

**Contact:** Kirsten Kulis [kkulis@achp.gov](mailto:kkulis@achp.gov)

In compliance with a 2008 Programmatic Agreement (PA), the U.S. General Services Administration (GSA) has begun transforming the St. Elizabeths National Historic Landmark into the future headquarters of the U.S. Department of Homeland Security. GSA has held monthly consulting party meetings for more than two years, and undertaken the development of the future U.S. Coast Guard Headquarters and adaptive use of subsidiary historic buildings. GSA also continues to fulfill numerous mitigation measures stipulated in the PA and subsequent Memoranda of Agreement.

On a prominent plateau in Southeast Washington, D.C., with views of the Anacostia and Potomac rivers, the Government Hospital for the Insane began offering services as the first federal mental health facility in the country in 1855.

Initially under the guidance of social reformer Dorothea Dix and noted physician Charles Nichols, the institution influenced the development of standards of care for many state hospital systems. Given the West Campus' picturesque location, well-conceived plan, custom-designed architecture, and self-sustaining farm, the facility also became a testament to the benefits of "moral treatment" of the mentally ill, which involved therapeutic use of the natural environment and agricultural facilities.

In 1869, additional land was purchased across the street to serve as farmland. Around the turn of the century, that area was developed to house a steadily increasing patient population. The East and West Campuses, together totaling more than 300 acres, were renamed by Congress in 1916 as "St. Elizabeths" after the title of the colonial land grant. The East Campus is the site of the Blackburn Laboratory, where



The old St. Elizabeths gatehouse is being rehabilitated on the West Campus. (photo courtesy GSA)

leading-edge anatomical and psychological research was conducted in the 1920s.

The U.S. Department of Health and Human Services, and its predecessor agencies, controlled and operated the hospital from its founding until 1987. Listed in the National Register of Historic Places in 1979, the site was designated a National Historic Landmark (NHL) in 1990.

The East Campus is now owned by the District of Columbia, which operates a new public psychiatric facility within the 148-acre site. The District is drafting a master plan for redevelopment of the remainder of the East Campus, has consulted upon proposed federally funded transportation improvements in accordance with Section 106, and is in negotiations with the General Services Administration (GSA) for its redevelopment of a parcel for a new Federal Emergency Management Agency (FEMA) headquarters.

Meanwhile, redevelopment of the 176-acre West Campus is proceeding in accordance with a Programmatic Agreement (PA) among GSA, the ACHP, the DC Historic Preservation Office, the National Capital Planning Commission, the Federal Highway Administration, and the Department of Homeland Security (DHS), executed in 2008. The PA was the product of protracted consultation among numerous consulting parties, which resulted in a redistribution of development square footage between the two campuses, a lower overall development profile, reuse of most of the NHL-contributing historic buildings,

and implementation of a management plan for the NHL-contributing historic landscape.

The PA contemplated the subsequent execution of separate Memoranda of Agreement (MOAs) to address the multi-phased redevelopment. The larger DHS consolidation project, planned for both the West Campus and a portion of the East Campus, includes approximately 4.5 million gross square feet of development and 1.5 million square feet of parking, to accommodate 14,000 employees.

GSA has held monthly consulting party meetings for more than two years, which are attended by the PA signatories, numerous consulting parties, and a number of interested parties. Resulting MOAs document resolution of adverse effects associated with installation of utilities and infrastructure, the construction of an expansive new U.S. Coast Guard (USCG) headquarters and parking, security perimeter improvements, and an on-site access road. GSA also plans to adaptively use 10 contributing buildings, totaling approximately 140,000 gross square feet, and a historic wall that is nearly three-quarters of a mile long. Current construction is expected to be complete in 2013, and the USCG plans to occupy its new headquarters that same year. Future plans call for reuse of almost all of the remaining 41 West Campus contributing buildings, including the impressive Center Building, as a new consolidated headquarters for DHS.

GSA has recorded its ongoing mitigation efforts through the submittal of annual reports, as required by the PA. In conjunction with the DC Preservation League, GSA offers monthly tours of the historic site and published a brochure on the history of the campus. GSA completed numerous archaeological surveys and analyses, developed an Archaeological Resource Management Plan, and completed Historic American Landscape Survey documentation. Historic American Building Survey (HABS) documentation is underway for 32 buildings, which have already been photographed in accordance with HABS standards. Archival information was collected, catalogued, and submitted to the Library of Congress. An Interpretive Plan was developed this winter as well which, together with oral histories collected in 2011 and substantial research of primary documents in the National Archives, is serving as the basis for a book about the



Building 37, Hitchcock Hall, was a theater used for therapy in the dramatic arts. It will be rehabilitated. (photo courtesy GSA)

property. GSA expects that the text will be complete at the end of this year.

Much of the funding for GSA's initial construction, first-phase adaptive use, and mitigation efforts was provided through the FY 2009 federal budget and American Recovery and Reinvestment Act funds, which are now expended. Due to congressional appropriations, it appears that the overall timeline to complete the entire DHS relocation to St. Elizabeths may change. The impact of reduced federal appropriations on additional adaptive use within the historic campus is being assessed. GSA acknowledges that mitigation efforts may take longer than expected to complete but remains committed to fulfilling its obligations in accordance with the PA and MOAs. The PA remains in effect until December 2018, unless another date is agreed upon by the PA signatories.

For more information: [www.stelizabethsdevelopment.com](http://www.stelizabethsdevelopment.com) and [www.gsa.gov/historicbuildings](http://www.gsa.gov/historicbuildings)

# MASSACHUSETTS

**Project:** Closed Case: St. Joseph's Parish Conversion to Affordable Community Housing  
**Agencies:** Massachusetts Department of Housing and Community Development  
**Contact:** Jaime Loichinger jloichinger@achp.gov

While the removal of an International Style church and an associated convent in Salem were deemed necessary, structure removal will be mitigated by documentation, allowing an important project to proceed. The rectory and school buildings of the former St. Joseph's Parish will be stabilized and marketed for adaptive reuse. A Memorandum of Agreement was executed on March 15, 2012.

The Planning Office for Urban Affairs of the Archdiocese of Boston is proposing to redevelop property at 135 Lafayette Street in Salem (the former St. Joseph's Parish) into 51 units of affordable housing and retail space with some areas for community use. The St. Joseph's Parish Complex consists of a church, school, rectory, and convent. The church and convent are slated for demolition; the rectory and school will be retained.

The Department of Housing and Community Development (DHCD) is the responsible entity for the project, with the Massachusetts Housing Finance Agency assisting in the environmental review. DHCD intends to use federal HUD HOME funds for this project, triggering Section 106 review. HOME is the largest federal block grant to state and local governments that is designed exclusively to create affordable housing for low-income households. Each year it allocates approximately \$2 billion among the states and hundreds of localities nationwide.

The proposed demolition of some buildings—including the church itself—became an issue for some members of the Salem community. St. Joseph's Parish Complex is eligible for listing in the National Register of Historic Places. Some structures remaining on the site are relatively more modern vestiges of previous structures, including at least three different church structures. The most recent church on the site was constructed beginning in 1949 in the International Style. The cruciform church structure is visible for some distance from the grounds and is a prominent city landmark.



St. Joseph's Church will be razed for new construction as part of a project to create affordable housing in Salem. (photo courtesy National Trust for Historic Preservation)

The parish school closed in June 2009, four years after the parish closure. The school will be converted to new residential use. The last of several Catholic schools in Salem to cease operations, it dated back 116 years.

The ACHP became involved in the consultation by request of local organizations and persons who believed the structures to be removed were not given sufficient consideration for reuse and integration into the housing proposal. The ACHP initially decided not to participate, but after hearing from consulting parties about a possible lack of alternatives analysis, the ACHP entered consultation on December 7, 2011.

Consulting parties included the Massachusetts State Historic Preservation Office, North Shore HOME Consortium, City of Salem Planning Department, Salem Historical Commission, and Historic Salem, Inc. Some consulting parties felt the church could be adaptively reused for the housing, and that DHCD had not adequately analyzed alternatives. DHCD conducted further analysis that looked closely at the character defining features of the entire parish complex, as well as the church, and determined the open space of the church was critical to the parish complex's significance. As such, adaptive reuse would not avoid creating an adverse effect to the historic property and did not adhere to the overall project's purposes and goals.

The MOA allows for full photographic documentation, stabilization of the remaining buildings on the property, a marketing plan for the remaining buildings, and potential archaeological plans if needed to recover a religious statue that possibly is still on the property.

# MULTI-STATE

**Project:** New Case: Atlantic Wind Energy Initiative

**Agencies:** Bureau of Ocean Energy Management

**Contact:** Tom McCulloch [tmcculloch@achp.gov](mailto:tmcculloch@achp.gov)

Incorporating lessons learned from the Cape Wind project in Massachusetts, the Bureau of Ocean Energy Management has worked with State Historic Preservation Offices in four Mid-Atlantic states as well as Indian tribes to create a Programmatic Agreement to implement the Obama Administration's "Smart from the Start" Atlantic Wind Energy Initiative.

The ACHP recently participated in the execution of a Programmatic Agreement (PA) for the development of wind energy resources on the Atlantic Outer Continental Shelf. The PA was executed among Bureau of Ocean Energy Management (BOEM); the ACHP; the State Historic Preservation Offices of Delaware, Maryland, New Jersey, and Virginia; and the Narragansett and Shinnecock Indian Tribes.

The PA sets forth a process for the preliminary environmental review of Wind Energy Areas (WEAs) off the coasts of the four Mid-Atlantic states. Delaware has 122 square mile of potential offshore lease areas; Maryland has 94 square miles; New Jersey has 418 square miles; and Virginia has 164 square miles. The WEAs were identified by state-level task forces comprised of elected state, local, and tribal officials.

The WEAs that each of the four states have identified are areas where winds are constant and predictable, and where wind farms would not interfere with shipping lanes, migratory bird or fish populations, aircraft routes, or get in the way of military exercises. In addition, the wind farms will be at least 10 miles off the coasts to minimize visual effects to historic properties.

The BOEM developed an extensive Section 106 consultation process starting early and involving all of the stakeholders—states, local preservation and maritime organizations, and tribes that may have concerns about how historic properties and landscapes may be affected by wind farms. This includes early discussions in order to identify properties that may be affected, so the parties can work to minimize any adverse effects



There are no offshore wind farms yet in the waters off the United States, but they will doubtless resemble the sites already established in Europe, such as this image taken off the coast of Denmark. (© David Cannings-Bushell)

earlier, rather than later, when options and alternatives are more feasible. BOEM initiated consultation with SHPOs, tribes (Narragansett and Shinnecock), and local communities to ensure their views were fully considered in development of this PA, and in the procedures contained in the PA to evaluate how archaeological sites and landscapes that meet the National Register criteria are affected by construction and operation of wind farms in both the potential siting of the farms and in the subsequent permitting process for construction of the wind farms.

BOEM is currently consulting with the ACHP, the SHPOs and communities of Massachusetts and Rhode Island, and interested Indian tribes on a similar PA for the establishment of wind farms off the coasts of these two states.

In 2010, the ACHP accepted BOEM's request to participate in consultation after determining this project met all of the criteria for its involvement under Appendix A of the regulations implementing Section 106, 36 C.F.R. part 800. For more information: [www.doi.gov/news/pressreleases/Salazar-Launches-Smart-from-the-StartInitiative-to-Speed-Offshore-Wind-Energy-Development-off-the-Atlantic-Coast.cfm](http://www.doi.gov/news/pressreleases/Salazar-Launches-Smart-from-the-StartInitiative-to-Speed-Offshore-Wind-Energy-Development-off-the-Atlantic-Coast.cfm)  
[www.boem.gov/uploadedFiles/BOEM/Renewable\\_Energy\\_Program/Smart\\_from\\_the\\_Start/MidAtlantic-WEAs\\_DraftEA.pdf](http://www.boem.gov/uploadedFiles/BOEM/Renewable_Energy_Program/Smart_from_the_Start/MidAtlantic-WEAs_DraftEA.pdf)  
[www.mondaq.com/unitedstates/x/164106/Renewables/One+Small+Step+Forward+For+MidAtlantic+Offshore+Wind+Development](http://www.mondaq.com/unitedstates/x/164106/Renewables/One+Small+Step+Forward+For+MidAtlantic+Offshore+Wind+Development)



# NEW MEXICO

**Project:** Closed Case: Taos Regional Airport Expansion Plan

**Agencies:** Federal Aviation Administration

**Contact:** Blythe Semmer bsemmer@achp.gov

Consulting parties recently executed a milestone Memorandum of Agreement to resolve adverse effects to Taos Pueblo, a National Historic Landmark and World Heritage Site, from a runway expansion at the neighboring airport.

The recent execution of a Memorandum of Agreement (MOA) for an airport layout plan revision and federal funding considerations at Taos Regional Airport (SKX) represents a historic achievement for the Federal Aviation Administration (FAA), Taos Pueblo, and the Town of Taos by ensuring that the safety and accessibility of the airport are improved without unnecessary disruption of the Pueblo's traditional cultural practices.

The Town of Taos plans to construct a new, longer, cross-wind runway and associated infrastructure at Taos Regional Airport, an activity requiring the FAA's approval and to which FAA grant funds may be directed. The airport will continue to serve general aviation traffic, but the new runway would provide increased flexibility in the type of aircraft allowed to use the airport and in handling weather conditions for operations. Although the National Environmental Policy Act review process was initiated 20 years ago, the consultation to resolve adverse effects under Section 106 began with the FAA's finding of adverse effect in fall 2006. The ACHP joined Section 106 consultation at the request of the governor of Taos Pueblo in 2007.

Potential indirect adverse effects to Taos Pueblo lands (including the World Heritage Site and the Blue Lake Wilderness) presented significant concerns for the Pueblo, especially about interruptions to traditional cultural activities from overflights. FAA determined that the entire Area of Potential Effects (APE), within which the World Heritage Site is located, is a National Register-eligible historic district. The assessment of audible and visual effects to this property of religious and cultural significance to an Indian tribe initially



Taos Pueblo is the only World Heritage Site in the United States significant due to its living culture. (photo courtesy Blythe Semmer)

challenged FAA because it required different methods of analysis than those the federal agency typically relies upon to quantify noise and visual effects. Input from Taos Pueblo members, who possess unique expertise in defining the important characteristics of the Pueblo and how they could be affected by the runway project, informed FAA's broadened understanding of how effects likely to result from the undertaking could be adverse.

Consultation also involved the New Mexico State Historic Preservation Officer (SHPO), the National Park Service, and the New Mexico Department of Transportation's Aviation Division. FAA circulated a draft MOA in March 2009 and worked through the remainder of the year to address consulting party concerns with the proposed stipulations. Additional drafting efforts in 2010 focused on developing appropriate measures to limit overflights of Taos Pueblo. During an intensive phase of consultation and draft review that brought the Section 106 review to closure in November and December 2011, all parties carefully refined these measures and other stipulations providing for a broad educational effort to inform pilots about the Pueblo's unique culture and advise them about how they can contribute to its protection.

The MOA represents an unprecedented effort by FAA to voluntarily restrict overflights because of effects to a historic property. Directing pilots away from flying over Taos Pueblo lands was a central concern raised by the Pueblo during consultation, and the ACHP encouraged FAA leadership to consider thoughtfully the agency's responsibilities under the World Heritage

Convention in addition to Sections 106 and 110 of the National Historic Preservation Act. FAA determined that the unique status of Taos Pueblo as a World Heritage Site internationally significant for its ongoing way of life and living culture—the only World Heritage Site in the United States so recognized—merited consideration of measures outside the usual realm of Section 106 mitigation. The preamble to the MOA recognizes the extraordinary quality of these measures and makes explicit that the agreement does not establish a precedent for other FAA undertakings.

Another unusual stipulation was added in response to the Pueblo's desire to make voluntary flight restrictions included in the MOA enforceable prohibitions. Given that the FAA is unable to create such restrictions, the MOA provides for coordinated legislative action among Taos Pueblo, the Town of Taos, the ACHP, and the New Mexico SHPO to propose draft legislation to achieve this goal. The consultation process also illuminated communal interests between the Town of Taos and Taos Pueblo. One stipulation of the MOA provides for a Taos Pueblo member to be appointed to the Town's Airport Advisory Board, an indication of how this working relationship may be enhanced as the implementation process begins.

All parties to this long-running Section 106 consultation greet the finalization of the MOA as an important achievement. The implementation plan formalized in the agreement successfully balances the needs of aviation safety with protection of a unique historic property and the vibrant traditional culture of Taos Pueblo. As a Section 106 review outcome, the Taos Regional Airport Layout Plan Revision Approval MOA can be commended for its adoption of good preservation practice and policy.

For more information: <http://whc.unesco.org/en/list/492>



Taos Pueblo (photo courtesy Blythe Semmer)



# NEW YORK

**Project:** New Case: Tappan Zee Hudson River Crossing Project

**Agencies:** Federal Highway Administration

**Contact:** Carol Legard clegard@achp.gov

The 1950s-era Tappan Zee Bridge, the longest bridge in New York, is being replaced as one of 14 high priority infrastructure projects nationwide under an Obama Administration initiative to expedite permitting and environmental reviews. The proposed project will demolish the existing bridge and replace it with two new spans.

The 3.2 mile-long Tappan Zee Bridge provides the only interstate highway crossing (I-87/287) of the Hudson River for the 48 miles between the George Washington Bridge (I-95) and the Newburgh-Beacon Bridge (I-84). It is a vital link in the regional and national transportation network; however, it fails to meet the structural, operational, safety, security, and mobility needs of today's public. The project was selected by the Obama Administration for expedited review under the August 31, 2011, Presidential Memorandum on Speeding Infrastructure Delivery through More Efficient and Effective Permitting and Environmental Review. The ACHP sits on the Administration's Rapid Response Team which tracks progress on all 14 expedited projects. Under an aggressive schedule for project delivery, the target date for completing Section 106 review for the Tappan Zee Bridge is June 2012.

The Federal Highway Administration (FHWA) is the lead federal agency for environmental review, and the New York State Department of Transportation (NYSDOT) and New York State Thruway Authority (NYSTA) are co-leads. The ACHP, New York State Historic Preservation Officer (SHPO) and eight other agencies are cooperating agencies in development of an Environmental Impact Statement (EIS), which was released in draft on January 18, 2012.

The Tappan Zee Bridge and two National Register-eligible residences in the South Nyack Historic District will be directly affected by the proposed project. The Tappan Zee Bridge was built in the 1950s to carry the New York State Thruway and the pro-



The Tappan Zee Bridge will be replaced by new structures. (photo courtesy Wikipedia Commons)

posed Interstate Highway over the Hudson River from Rockland County to Westchester County. The bridge has exceptional significance in transportation and engineering history. Because of the depth of bedrock under the river bed, an innovative system was designed in which eight buoyant caissons were constructed north of the crossing site in a natural clay pit in Grassy Point, creating the world's largest natural dry dock. When completed, the clay pit was flooded and the caissons were floated into place. The completed bridge is a 3.2-mile-long structure supported by a substructure consisting of abutments and 197 piers. The piers are erected upon four types of foundations, including river-based timber piles and the eight buoyant caissons.

The National Register-eligible South Nyack Historic District is characterized by large Second Empire estates, Queen Anne-style residences, and modest residences built in the Tudor, Colonial Revival, and Craftsman styles. The two homes to be demolished date to the period of significance for the district (1830-1935), and are contributing properties.

In addition to direct impacts, consulting parties representing nearby historic districts, eligible buildings, and three National Historic Landmarks (NHLs) are concerned about the change in the views from their properties. The Hudson River's wide expanse historically permits distant views of the river valley in all directions. Although National Register-eligible, the existing Tappan Zee Bridge post-dates the period of significance for most historic structures and districts with views of the bridge. FHWA maintains that the

change in the view will not be significant.

The draft EIS proposes two options for the main span over the navigable channel: a cable-stayed span or a steel arch structure. The project will be bid as a design-build contract in order to expedite construction. This creates uncertainty in the final design, but it allows for additional creativity and possible cost savings in having the project designed and built by one contracting team. Section 106 consultation on the new project was initiated in October 2011. Consulting parties include the ACHP and SHPO, individuals and organizations representing local governments in the vicinity, the Delaware Nation, Delaware Tribe, Friends of the Old Croton Aqueduct, Historical Society of Rockland County, Historical Society of the Nyacks, Lyndhurst (a National Trust for Historic Preservation property), Riverkeeper, Saint Regis Mohawk Tribe, Shinnecock Nation, Stockbridge-Munsee Band of Mohican Indians, and Westchester County Historical Society.

A draft Memorandum of Agreement (MOA) for the project must account for the flexibility allowed in the design-build process, while affording protection for historic properties that may be affected. Measures included in the draft MOA include additional studies to determine if submerged archaeological properties are present, and mitigation for the direct impacts to the bridge and the South Nyack properties. In addition, the NYSDOT and NYSTA must develop a construction protection plan detailing measures to protect adjacent properties from noise, vibrations, and other potential impacts during project construction.

The ACHP has requested that FHWA also include in the MOA specific requirements for a context sensitive design that is a visual asset to the community, and for the selected contractor to prepare a public outreach plan to ensure that the consulting parties and the broader public have input into the final design. In response to concerns about the visual impacts of a new bridge, the project sponsors propose to work with property owners in close proximity to the new bridge to mitigate the effects with visual buffers or other screening. More distant views of the new bridge will be a factor in finalizing the project design. The project sponsors have prepared a Public Involvement Plan focused on both Section 106

consulting parties and the broader public, and the selected design-build contractor will be responsible for implementation of the plan. Consultation on the MOA continues.

For more information: [www.whitehouse.gov/the-press-office/2011/08/31/white-house-announces-steps-expedite-high-impact-infrastructure-projects](http://www.whitehouse.gov/the-press-office/2011/08/31/white-house-announces-steps-expedite-high-impact-infrastructure-projects)

<http://permits.performance.gov/projects/tappan-zee-bridge-replacement>



This view of the existing Tappan Zee Bridge shows the innovative floating caissons in the foreground. (photo courtesy Wikipedia Commons)

# OHIO

**Project:** Ongoing Case: Mitigation of Adverse Effects to Pennsylvania Railway Ore Dock, Cleveland

**Agencies:** U.S. Army, Corps of Engineers

**Contact:** John Eddins jeddins@achp.gov

A contentious and longstanding Section 106 process on a project involving demolition of historic ore-loading structures and other contributing elements of the Pennsylvania Railroad Ore Dock that started more than a decade ago has been revived by renewed attempts to reach consensus on ways to resolve adverse effects.

The Corps of Engineers, Buffalo District (Corps), recently re-initiated consultation to resolve the adverse effects associated with a re-application by the Cleveland-Cuyahoga County Port Authority (Port) for a permit to dredge in Cleveland Harbor.

In 2005, the Port applied for a permit under Section 10 of the Rivers and Harbors Act for dredging in Cleveland Harbor associated with the proposed expansion of the Cleveland Bulk Terminal (CBT). The CBT, formerly known as the Pennsylvania Railroad Ore Dock (Ore Dock), was listed on the National Register of Historic Places in 1997. A major feature of the Ore Dock were four Hulett ore unloaders. These automatic ore unloaders were initially developed in the late 19th century and revolutionized the iron ore transportation process on the Great Lakes in the 20th century, dramatically reducing the cost and time for loading/unloading ships, and leading to construction of ships with double the load capacity.

The proposed dredging has been part of an expansion plan for the CBT, which was initiated more than 15 years ago. In 1999, the Port applied for a permit to dredge along 2,000 feet of the CBT dock face. At the time, the Corps advised the Port that, under Appendix C of 33 CFR part 325, it would not have jurisdiction over the larger CBT expansion project if the permit application was reduced from a proposed 2,000 feet to 600 feet. The 600-foot length would represent maintenance dredging associated with the existing facilities. The 2,000-foot length would be associated



A Hulett Ore Unloader before its removal as part of the Pennsylvania Railway Ore Dock project in Cleveland (photo courtesy Library of Congress)

with the proposed expansion of the CBT.

Subsequently, the Port reduced the size of the requested dredge area. The Corps issued a permit in May 1999, without carrying out consultation for the effects of the larger CBT expansion on historic properties as required by Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations. The expansion of the CBT resulted in the demolition or removal of most of the components of the Ore Dock. The approach taken by the Corps in this case follows the Corps' own Appendix C, a process that has never been approved by the ACHP as an alternative to the Section 106 regulations and that differs from Section 106 requirements in a number of important ways.

Following issuance of the 1999 permit, and despite protests from the Ohio State Historic Preservation Officer (SHPO), the ACHP, National Trust for Historic Preservation (NTHP), and others, the Port proceeded to demolish some of the existing components of the CBT. Prior to removal of the historic resources, the Port Authority applied for, and received, approval from the Cleveland Landmarks Commission to demolish and remove the historic resources. As a result, two Hulett Ore Unloaders were demolished, two Hulett Ore Unloaders were dismantled and stored on-site, two shunt engines were transferred to museums, and several other structures were demolished. The Hulett's and some of the other affected components were contributing elements of the listed National Register Property.

In 2001, the Corps was required to revoke the permit as a result of a U.S. District Court ruling (*Committee to Save Cleveland's Hulett v. U.S. Army Corps of Engineers*, 163 F. Supp. 2d 776 (N.D. Ohio 2001)), in a law suit brought by the Committee to Save the Hulett. The U.S. District Court in Ohio, Eastern Division, found that the Corps had violated NHPA by issuing a permit without awaiting comment from the SHPO and the ACHP. The Court also ordered that the Corps must comply with all requirements of the NHPA when considering any new permit application.

Following a new permit application in 2005 to dredge along 2,000 feet of the CBT dock face, the Corps issued a public notice in March 2006. As required by the 2001 court ruling and in response to an ACHP request, the Corps, in 2007, made a determination regarding the applicability of Section 110(k) of the NHPA in this case. Section 110(k) of the NHPA prohibits a federal agency from granting a loan, loan guarantee, permit, license, or other assistance to an applicant who, with intent to avoid Section 106 of the NHPA, has intentionally significantly adversely affected a historic property to which the grant would relate or, having legal power to prevent it, has allowed such a significant adverse effect to occur. The Corps determined that Section 110(k) did apply but that there were mitigating circumstances that allowed the Corps to continue the permit review, including the Section 106 review, and potentially issue the permit.

The Corps conducted consultation meetings in February 2007, October 2007, and November 2010. Consulting parties have included the Port; the Ohio SHPO; U.S. Rep. Dennis Kucinich; the NTHP; the Ohio Canal Corridor; the Cleveland Restoration Society; the Committee to Save Cleveland's Hulett; Cleveland City Councilman Matt Zone; Carmeuse Lime and Stone, a subsidiary of the Belgian-owned Carmeuse Group, (formerly Oglebay Norton Company) that rents the ore dock; and, several individuals. The Corps has also distributed several drafts of a Memorandum of Agreement (MOA) for comment by consulting parties.

Mitigation alternatives discussed at consultation meetings and in correspondence have included actions already carried out by the Port under the 1999 Cleveland Landmarks Commission resolution.

These include HABS/HAER recordation, vertical reassembly of a Hulett at the CBT or at one of several other locations, identification of significant elements of the Hulett for public display and interpretation at the Great Lakes Science Center Steamship *William G. Mather* in Cleveland and/or at the Willis B. Boyer Maritime Museum in Toledo, and a written history of and preservation plan for Whiskey Island and the surrounding area. The cost to transport, create a foundation for, reassemble, and provide long-term maintenance for a re-erected Hulett may prove unreasonable. Further, to date, no local government or entity appears to be interested in providing the space and accepting long-term responsibility for a reconstructed Hulett.

In February 2012, the Corps provided an updated summary of the Section 106 consultation and the mitigation alternatives that have been discussed. It also distributed an updated and revised draft MOA for consideration. A follow-up consultation meeting took place on March 22, 2012. Consulting parties reviewed previous proposals regarding potential mitigation alternatives. They also introduced and discussed preservation and interpretation of one of the dismantled Hulett in a horizontal presentation in a public park, rather than vertical reassembly. Promoters of this idea believe it would be much less expensive and enable access by the public in a setting that would still facilitate recognition of its size and scale. A sub-committee of consulting parties proposes to develop protocols for the Section 106 agreement document that would allow the Corps to finalize its Section 106 compliance and provide time to research the feasibility of this option and get agreement from the local community.

For more information:

[www.achp.gov/casearchive/casessum01OH.html](http://www.achp.gov/casearchive/casessum01OH.html)



# TENNESSEE

**Project:** Ongoing Case: Memphis National Cemetery Building Upgrades

**Agencies:** National Cemetery Administration, Department of Veterans Affairs

**Contact:** Brian Lusher blusher@achp.gov

A proposed project to upgrade a group of buildings near the entrance to Memphis National Cemetery could involve the razing of two historic structures. The Section 106 process, as it moves toward creation of a Memorandum of Agreement on the overall project, has resulted in the National Cemetery Administration developing a design alternative that considers reuse instead of demolition of one of two surviving Colonial Revival superintendent's lodges in Tennessee under NCA's management.

In November 2011, the National Cemetery Administration (NCA), Department of Veterans Affairs, initiated consultation to upgrade a small complex of administration, storage, and utility buildings at Memphis National Cemetery. The proposed undertaking includes demolition of the vacant superintendent's lodge (1934) and a utility building (1930s-1940s era), renovation of an administration building (1960s-1970s era), removal of an open brick-lined drainage feature, construction of additional parking, and irrigation improvements. Construction of a new administration building is proposed for the sites currently occupied by the superintendent's lodge and utility building.

The superintendent's lodge is one of two of this style in Tennessee managed by NCA. A third is found at the National Park Service's Shiloh National Military Park. NCA manages nine lodges of this style nationwide.

Established in 1867, Memphis National Cemetery is notable for its connection to the Civil War. Originally known as the Mississippi River National Cemetery, both Union and Confederate casualties are interred there as the result of relocation of remains from nearby battlefields and military hospital cemeteries.

Additionally, many of the victims of the steamboat USS *Sultana* explosion on April 26, 1865, are buried in the cemetery. On that evening, the USS *Sultana*, overloaded with as many as 2,400 soldiers, most of whom had recently been liberated from Confederate



The superintendent's lodge is imperiled by development plans but may yet be saved. (photo courtesy Memphis National Cemetery)

prisoner-of-war installations, was destroyed when three of its four boilers exploded, killing as many as 1,800 of those aboard. Among the worst maritime disasters in U.S. history, the incident was somewhat overshadowed by other national events earlier in April 1865, including the surrender of Gen. Robert E. Lee and the assassination of President Abraham Lincoln.

NCA proposes to create a Memorandum of Agreement to guide actions as the project commences. NCA sent the ACHP an adverse effect notification in November 2011 which resulted in the ACHP's decision to participate in consultations. The Tennessee State Historic Preservation Office also is participating.

The entire cemetery, including 42,000 interments, is listed in the National Register of Historic Places. Contributing resources include the cemetery grounds, superintendent's lodge, west perimeter brick wall, entrance gate, flagpole, and Minnesota and Illinois monuments.

It is too early to tell what the agreement document will achieve until NCA has finished its analysis of reuse options for the lodge and consulted with stakeholders on findings. However, based on consulting party comments, the NCA is considering whether the superintendent's lodge may be reused in order to accommodate the functional needs of NCA and consider historic properties in the planning process.

In encouraging the NCA to consider reusing this historic superintendent's lodge, this alternative analysis may be used as a template and could be replicated at other NCA properties with vacant or under-utilized superintendent's lodges. For more information: [www.cem.va.gov/cems/nchp/memphis.asp](http://www.cem.va.gov/cems/nchp/memphis.asp)

# WASHINGTON

**Project:** Closed Case: Statewide Agreement for Federal-Aid Highway Projects on National Forest System Lands

**Agencies:** Federal Highway Administration

**Contact:** Carol Legard [clegard@achp.gov](mailto:clegard@achp.gov)

The Federal Highway Administration (FHWA) recently concluded consultation and executed a second statewide Programmatic Agreement for Washington. In 2007 the Washington Division FHWA put in place a statewide Programmatic Agreement for streamlining Section 106 review. It has now executed with the State Historic Preservation Officer and the ACHP a second statewide agreement focused on streamlining Federal-Aid Highway projects that occur on Forest Service lands.

On January 13, 2012, the Federal Highway Administration (FHWA), the US Forest Service, Pacific Northwest Region (FS), Washington State Department of Transportation (WSDOT), Washington State Historic Preservation Officer (SHPO), and the ACHP executed a Programmatic Agreement (PA) to address FHWA-funded projects on Forest Service lands in Washington. FHWA provides funding for projects through the Federal Aid Highway program, and project review is administered by the WSDOT. For projects crossing FS lands, the FS is required to authorize the use of right-of-way for the project in the form of a “consent for appropriation” of federal land. In such cases, the agencies have agreed that FHWA is the lead federal agency for completion of Section 106.

Under the PA, FHWA has designated WSDOT to carry out certain activities, including initiating and conducting consultation with federally recognized Indian tribes and other consulting parties, determining the Area of Potential Effects (APE) for undertakings, conducting cultural resource surveys, and recommending determinations of eligibility and effect on behalf of FHWA.

The delegation of responsibility for consultation with federally recognized Indian tribes is consistent with



A new statewide Programmatic Agreement covers routine improvements to highways on Forest Service lands such as this one through the Wenatchee National Forest in Washington. (photo courtesy andallthatmalarkey)

procedures in the larger, statewide PA for the Federal-Aid Highway Program in Washington State. WSDOT may only initiate and carry out consultation with each Indian tribe if the tribe agrees to do so. The PA requires that WSDOT and FHWA honor any request from a tribe to consult directly with FHWA.

In order to streamline review, the PA identifies undertakings that have “minimal potential to cause adverse effects to historic properties.” Certain undertakings do not require Section 106 review by the SHPO or Forest Service Heritage Program Manager provided background research indicates that there are no known historic properties or eligible resources in the area of potential effects that could be affected by the undertaking, and low potential for unknown resources. Undertakings that may be exempted from further review include actions such as roadway surface replacement, installation of traffic control devices, in-kind emergency repairs, rock removal and stabilization activities, and use of previously disturbed areas for temporary construction staging. A separate list includes WSDOT activities that are also exempted from SHPO review but require coordination with the Forest Service Heritage Program Manager to determine the appropriate level of identification.

For undertakings exempted from SHPO review, WSDOT will complete identification and evaluation of historic properties in coordination with the FS and other consulting parties, as needed. If a Federal-Aid Highway Project may have an effect on historic properties, WSDOT must initiate consultation in



accordance with 36 CFR Part 800, involving the FS, SHPO, affected Indian tribes, and other consulting parties.

This is the only statewide PA specifically developed to address FHWA undertakings on federal lands. It may serve as a model for other states with a similar need to clarify roles and responsibilities, and to expedite routine projects. With little risk of causing inadvertent damage to historic sites, the PA should save WSDOT, FHWA, and FS considerable time and money in processing minor projects with no historic properties affected.

For more information: [www.achp.gov/fhwa-samplepas.html](http://www.achp.gov/fhwa-samplepas.html)







*Preserving America's Heritage*

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