Preserving Historic Structures in the National Park System: A Report to the President

U.S. Department of the Interior
National Park Service
National Center for Cultural Resources Stewardship and Partnership Programs

Park Historic Structures and Cultural Landscapes Program

U.S. Department of the Interior, Mission Statement

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to tribes.

CONTENTS

Secretary's Letter

Status 1

Setting Priorities 9

Option Recommendations 13

APPENDIXES

A. President's Memorandum of April 22, 1996 19

B. Status Definitions 23

C. Prioritization Test Case: Southeast Coastal Fortifications, August, 1995 29

D. Leasing Program Review and Recommendations, August, 1996 55

E. Priorities Work Group Participants, April 26-27, 1995 109

F. Consulted Partners and Other Stakeholders 113

THE SECRETARY OF THE INTERIOR

WASHINGTON

OCT 3 1997

The President
The White House
Washington, DC 20500

Dear Mr. President:

I apologize for the delay in responding to your request pertaining to an April 22, 1996, memorandum to the Heads of Executive Departments and Agencies entitled *"Facilitating Public-Private Partnerships for Protection of the National Parks"* directing me to prepare a report on options for preserving park historic structures that considers the possibilities of private sector partnerships. I am pleased to enclose the requested report for your consideration.

The recommendations of this report were developed by the National Park Service and are summarized below. Four partnership options are presented.

Cooperative Agreements

Issue: In the past, the National Park Service has had limited authority to use cooperative agreements to allow partners to help preserve park historic structures. The Omnibus Consolidated Appropriations Act for Fiscal Year 1997, P.L. 104-208, gives the National Park Service expanded authority.

Recommendation: Implement this additional cooperative agreement authority based on the premise that resource preservation is a park program in support of a public purpose.

Leasing

Issue: In May 1995, I asked the Congress for expanded authority to lease all park real property, to retain half the income for park purposes, and to adjust the rental by taking into account any amounts expended by the lessee. This proposed legislation would allow packaging of historic and non-historic properties into economically viable leases and therefore could preserve additional historic structures. To date, this authority has not been enacted.

Recommendation: Renew the request for a general leasing authority.

Conveyance of Historic Structures

Issue: 16 U.S.C. § 4601-22a authorizes the Secretary of the Interior to convey a freehold interest in park real property with appropriate easements except in national parks, monuments of scientific importance, and properties that were always federally owned. Many historic structures for which there is insufficient preservation funding are located in these excepted types of parks.

Recommendation: Investigate the advantages and disadvantages of seeking legislation to allow conveyance of real estate in appropriate situations where resource protection would be enhanced in these excepted types of parks.

Philanthropic Support

Issue: Additional philanthropic support is needed to provide a portion of the large amount of funding that is required to supplement appropriated funds to preserve park historic structures.

Recommendation: Strongly encourage park superintendents to work with national and park partners to pursue actively additional philanthropic support for historic structures.

The National Park Service will work to implement these recommendations. Your continued interest in and support of the National Park Service is appreciated.

Respectfully,

Enclosure

STATUS

The National Park Service (NPS) defines a historic structure as "a constructed work ... . consciously created to serve some human activity." Historic structures are usually immovable, although some have been relocated and others are mobile by design. They include buildings and monuments, dams, millraces and canals, nautical vessels, bridges, tunnels and roads, railroad locomotives, rolling stock and track, stockades and fences, defensive works, temple mounds and kivas, ruins of all structural types, and outdoor sculpture.

According to both federal law and NPS *Management Policies,* all historic structures in the National Park System are to be managed as cultural resources. Regardless of type, level of significance, or current function, every structure is to receive full consideration for its historical values whenever a decision is made that might affect its integrity. Historic structures that are central to the legislated purposes of parks, especially those that are to be interpreted, may be subjects of additional, specialized efforts appropriate to their functions and significance.

Structure Inventory

The NPS maintains a computerized database containing information about historic structures in which the NPS has or plans to acquire any legal interest. Structures included are either in or eligible for the National Register or are to be treated as cultural resources by law, policy, or decision reached through the planning process even though they do not meet all National Register requirements. Data fields include identification, category of significance, condition, use, threats, treatments, cost estimates for treatments, and physical description.

The inventory has three major applications: (a) to describe historic structures on an individual or collective basis at park, cluster, field area, or system-wide levels, (b) as a common information source for other automated management systems such as the Maintenance Management (MM) program and the Housing Inventory, and (c) as an analytical tool in budgeting, scheduling, and program development.

Beginning in FY 1992, the NPS commenced a 6 year project to update the inventory data for the estimated 20,000-25,000 structures in the 369 parks.

This project is beginning to give us some very good information. As of March, 1996, data on 17,436 historic structures in 228 parks have been updated. The inventory includes all types of historic structures as defined above and shown in figure 1.

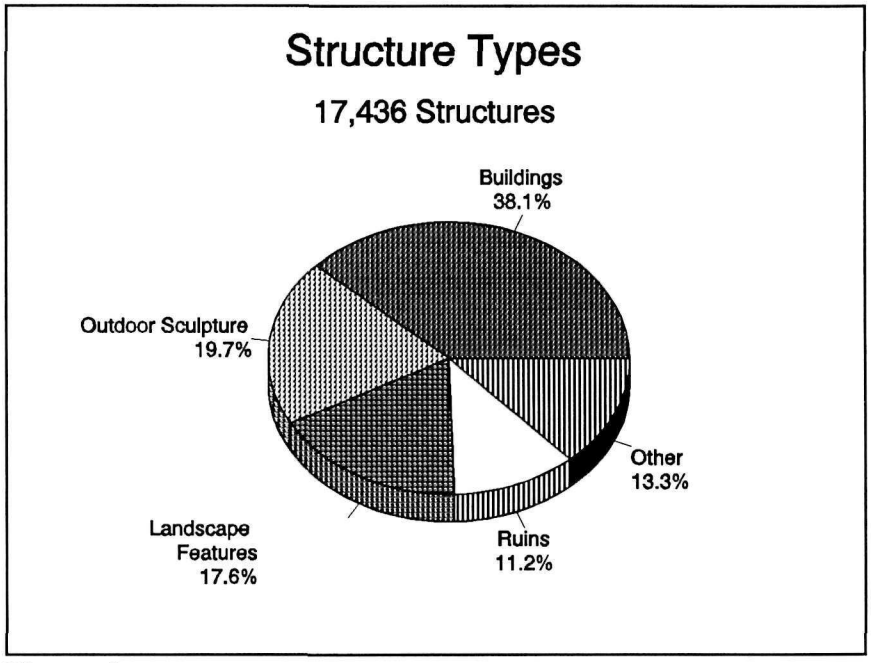

Figure 1

Condition

While 45.5% of the inventoried historic structures are in good condition; 54.5% are in poor, fair, or unknown condition (figure 2). See Appendix B for condition definitions.

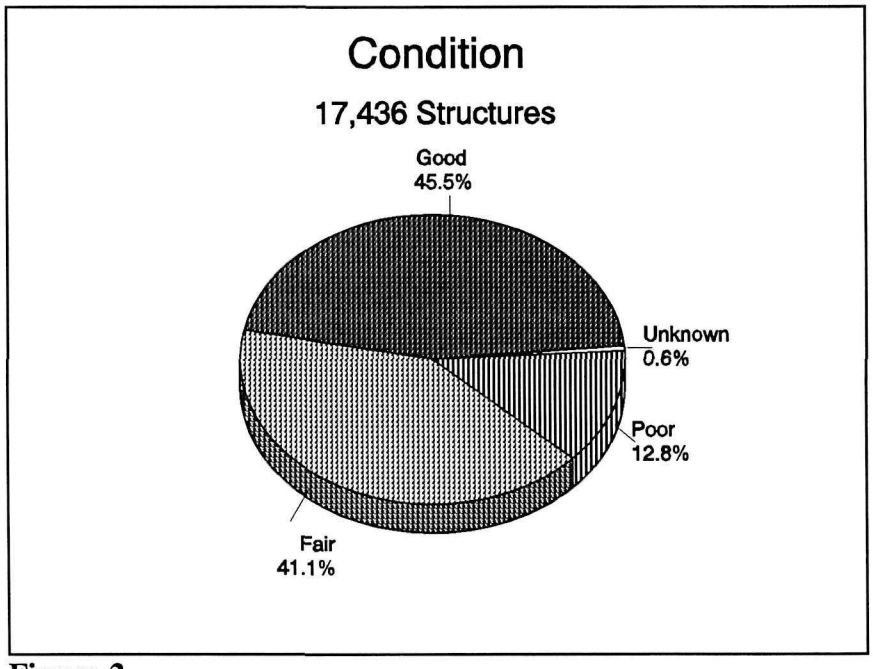

Figure 2

Impact Level

While the severity of all deleterious impacts is low for 56.1% of these structures, about 43.9% of structures endure moderate to severe impact levels or the impact is unknown (figure 3). See Appendix B for impact level definitions.

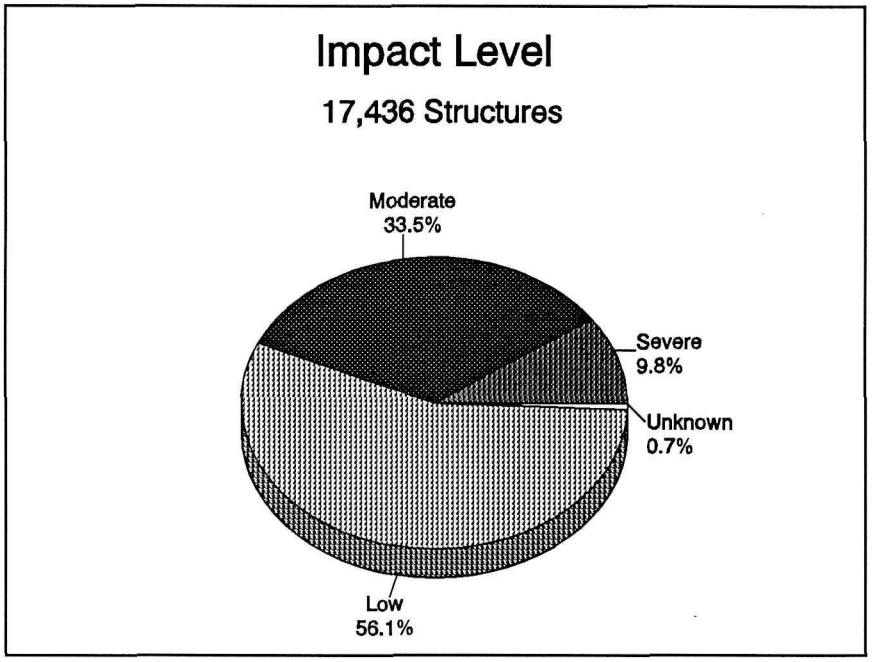

Figure 3

Condition and Impact Level

To be expected, there is a strong correlation between the condition of historic structures and the severity of impacts as shown in figure 4.

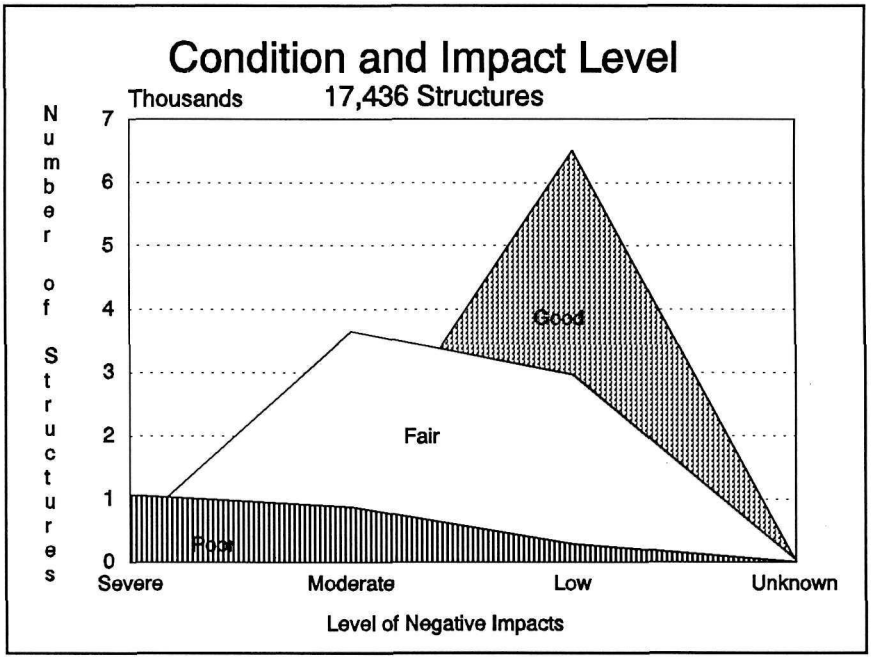

Figure 4

Major Types of Impacts

Weather and structural deterioration due to age and materials accounts for the primary negative impact on 57.5% of all historic structures. The major types of negative impacts are shown in figure 5.

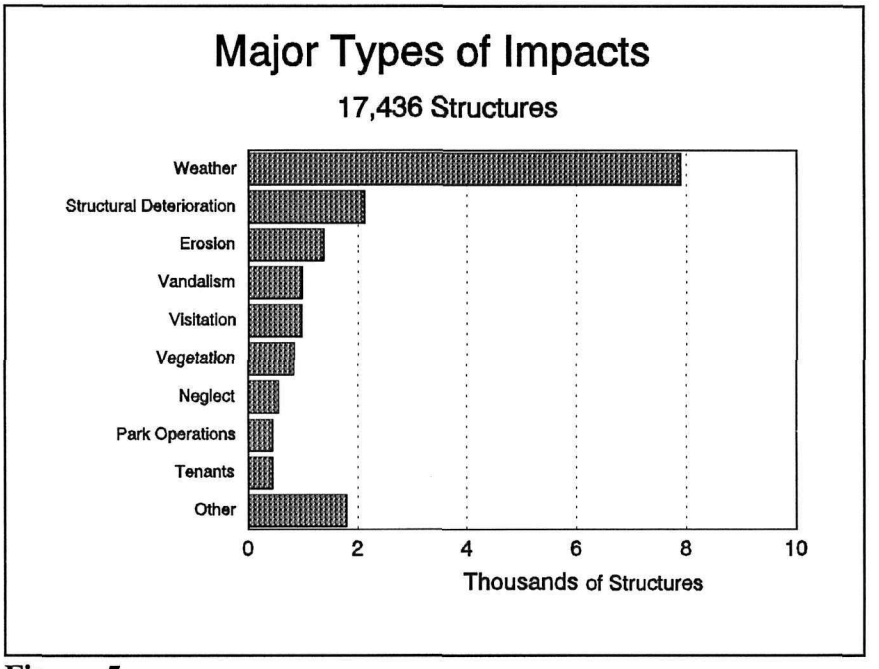

Figure 5

Management Agreements

Not all historic structures in parks are or can be managed directly by the NPS. Several alternatives are available and deserve consideration, particularly when treatment or use cannot be supported by the NPS. Management agreements are in place for 1,810 structures or 10.4% of all historic structures. Most commonly, management agreements exist for buildings, and the most common instruments are concession contracts and cooperative agreements.

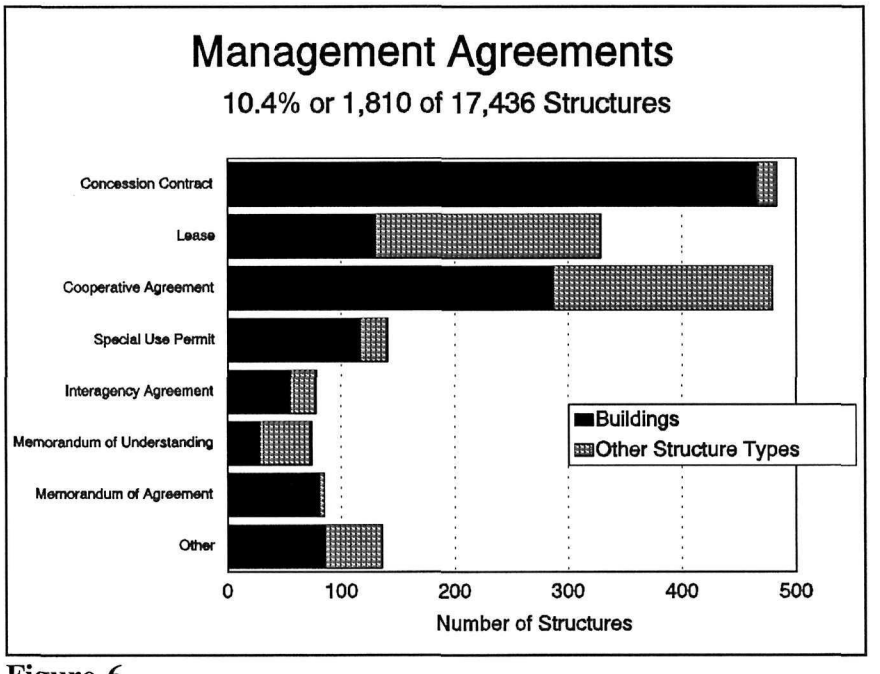

Figure 6

Maintenance and Major Treatment Responsibility

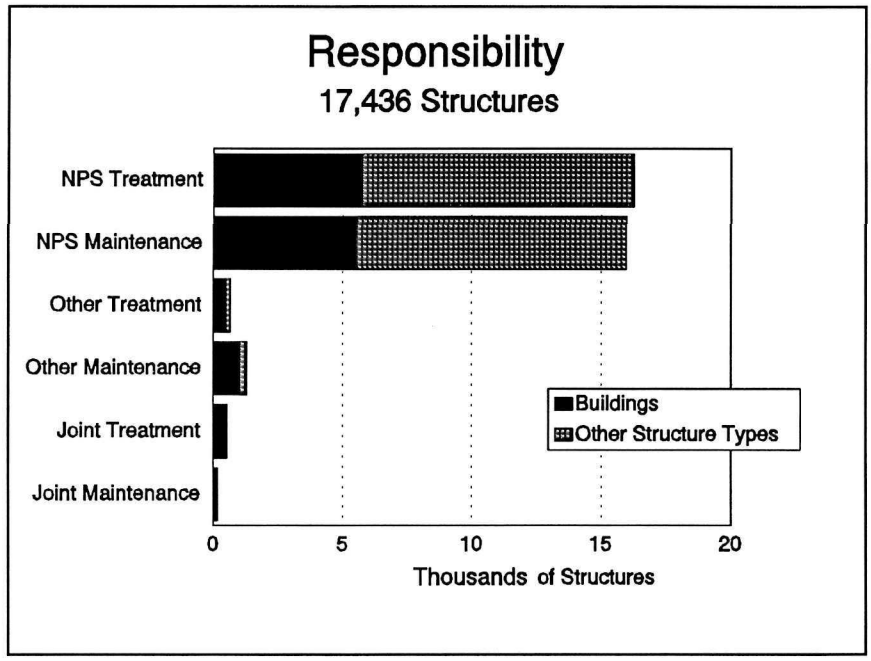

Figure 7

NPS is solely responsible for the maintenance and major treatment, i.e., rehabilitation, restoration, and reconstruction, of over 90% of all historic structures. Structures for which responsibility is shared or assumed by non-NPS parties are usually buildings. When maintenance responsibility is shared with a non-NPS party, usually the NPS assumes the responsibility of providing cyclic maintenance and the non-NPS party performs routine maintenance. When major treatment costs are shared, the NPS usually performs the approved treatment while the non-NPS party provides interim costs to maintain the structure until funds for the approved treatment are allocated.

Maintenance and Major Treatment Costs

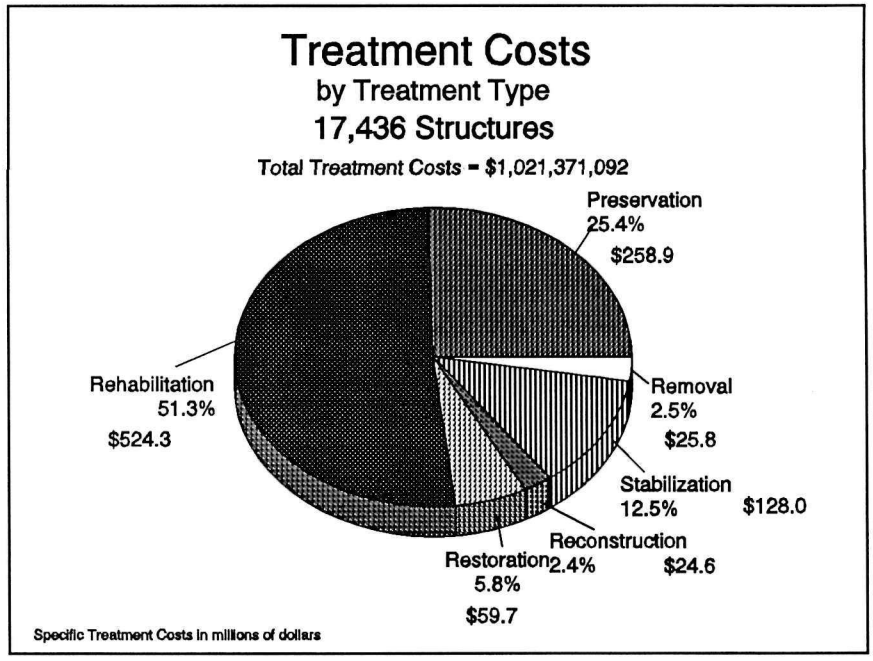

Figure 8

Unfunded costs associated with maintenance and the major treatments that have been approved by park planning documents for inventoried structures total $1,021,371,092. Of this amount, $386,899,329 is for stabilization and preservation which constitute the cyclic

maintenance backlog. See figure 8. See Appendix B for treatment definitions.

Although buildings constitute only 38.1% of all historic structures, the assessment of treatment costs for this type of structure is 69.2% of the total cost for all historic structures, as shown in figure 9.

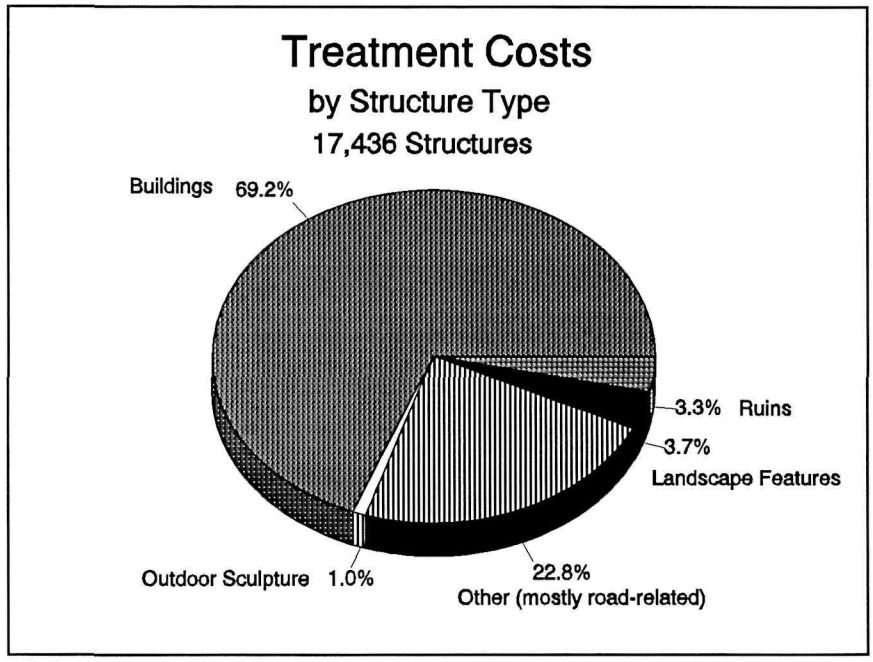

Figure 9

Although historic structures are used in many ways, the majority are either residential, government, recreational, transportation structures or structures not in use. Most of the treatment costs are also associated with these categories of structures.

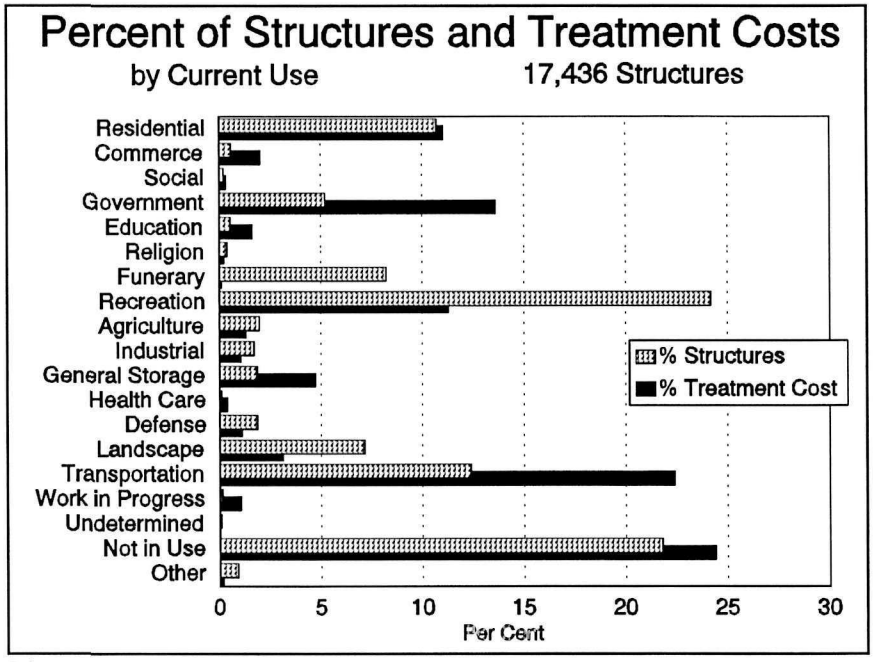

Figure 10

Unfunded Minimum Needs

Focusing on stabilizing and preserving just the national significant structures and those that contribute to national significance, the NPS has an unfunded need of $244,486,738 for the inventoried structures.

Examples include:

$1,220,300 to preserve the batteries at Fort Wadsworth at Gateway NRA. These batteries were constructed in the late 1800's and early 1900's as a result of President Cleveland's panel to review coastal defenses headed by William Endicott. These batteries were a radical shift in design, not only of armament, but also of the housing and ancillary supporting structures. The guns were breech-loading and bored. They could shoot farther, faster, and truer than the then common smooth bored, muzzle-loading cannons the Endicott guns made obsolete. The Narrows of New York harbor, the site of Fort Wadsworth, was a the top of Endicott's list of 27 sites that needed new defenses. Now these nationally significant batteries are in poor condition and suffering severe negative impacts with insufficient funds to arrest the continuing deterioration.

$22,500,000 to preserve five ships at San Francisco Maritime NHS. These ships include the steam schooner Wapama, scow-schooner Alma, schooner C.A, Thayer, steam tub Hercules, and the ferry Eureka. 225 steam schooners were built; only one remains today, the Wapama. The Alma and the C.A. Thayer also are the last existing examples of their respective class and design. There are no replacements for these historic vessels, but there are minimal funds to preserve them.

$1,455,000 to preserve the mansion at Vanderbilt Mansion NHS. The estate built by Frederick Vanderbilt represented the ostentatious display of family wealth built over three generations from industrial stewardship of America in shipping and in railroads. It represents a superb example of Italian Renaissance architecture. Frederick's wife's bedroom was copied from that of a French queen. When built in the early 20th century, the Vanderbilt estate was one of the greatest in America; today is even rarer, but fifty years of intensive use is having a toll, and funds are needed for preservation.

$1,000,000 to preserve the Mississippi State Memorial at Vicksburg NMP. This massive monument towers 76 feet tall over the landscape. Built between 1909 and 1912 of Mt. Airy granite and bronze to commemorate the brave men from Mississippi during the siege of Vicksburg in 1863, the monument contributes to the national significance of the battlefield. It is, however, in poor condition, and limited funds exist to preserve it.

In addition, $2,500,000 is needed to preserve the fort at Fort Point NHS; $1,518,000 to preserve the Paradise Inn at Mount Rainier NP; $1,626,000 to

preserve the fort at Fort McHenry NM; $375,000 to preserve the memorial at George Rogers Clark NM; and $1,981,000 to stabilize the West Ruin at Aztec Ruins NM.

Setting Priorities

As part of the inventory update, the NPS has categorized historic structures by management category that reflect park planning decisions. The following chart shows the number of structures in each management category for the different levels of significance. See Appendix B for management category definitions.

Significance	Management Category				Total
	A. Must be Preserved	B. Should be Preserved	C. May be Preserved	D. May be Disposed or Altered	
National	1,363	229	29	2	1,624
Contributing	8,412	1,109	502	35	10,058
State	280	1,692	162	12	2,146
Local	103	1,235	383	33	1,754
Not Evaluated	622	580	288	5	1,495
Not Significant	105	37	129	5	276
Unknown	21	41	22	0	85
Total	10,906	4,923	1,515	92	17,436

Based upon this management categorization, the NPS has become more aware of the unrealistic expectations reflected in and furthered by park planning documents and of the historic structure treatment pressures on a finite budget. Therefore, the NPS has begun to explore an alternative method for setting priorities as discussed in the following section.

SETTING PRIORITIES

Historic structures are not the only cultural resources in the National Park System, nor can they be considered apart from other types of cultural resources. They are often parts of cultural landscapes, they may be closely associated with archeological or ethnographic resources, and they may house museum objects or contribute to museum collections. However, they are among the System's most prominent cultural resources and the most costly to preserve.

Because the preservation needs of the NPS's historic structures invariably exceed the funds available for the purpose, decisions must inevitably be made about which structures should receive priority. Without the use of rational criteria for making such decisions, too often they are based on arbitrary considerations or reflect immediate pressures rather than long-range planning.

On March 13, 1995, the Deputy Director of the NPS asked the Associate Director, Cultural Resource Stewardship and Partnerships, and the Chief, Office of Policy, to develop a paper addressing this concern and providing guidance for setting historic structure preservation priorities. A Work Group on Priorities for Historic Structures assembled in Washington on April 26–27 to respond to this charge. See Appendix E for a list of participants.

The NPS Commitment to Cultural Resources

The NPS is committed to preserving and protecting the cultural resources entrusted to its care. Severe budget constraints, however, require a reexamination of NPS management practices and better guidance to managers on how to set priorities in allocating funds and personnel for resource preservation. The challenge is to determine the most appropriate treatment for each resource and to develop partnerships where necessary to assist in preservation efforts.

Much decision-making on allocation of money and people to meet resource preservation needs will be at the park and cluster levels. These decisions must be made in a collaborative, not competitive, fashion with a high level of trust among parks.

The Problem

Based on identified maintenance, rehabilitation, and development needs, the NPS does not have and has never had enough funds and staff to care for all resources in its custody. Contributing to this fundamental problem are unrealistic expectations reflected in and furthered by park planning documents, an overwhelming deferred maintenance workload, and a lack of multidisciplinary focus to set and achieve realistic goals in cooperative efforts recognizing the value of all aspects of park operations. As NPS

works to meet statutory responsibilities for basic resource inventory, this expanding body of information contributes to informed decision-making, but it can also result in additional resource protection pressures on a finite budget.

Funds and staff are unlikely to be increased and may be reduced. The NPS must therefore reevaluate critically its processes for setting priorities for resource preservation. Unless it makes explicit, rational decisions about what it can and cannot preserve and maintain, it will continue to lose resources by chance rather than choice.

The NPS is renowned for its preservation ethic, developed in direct response to the tremendously significant resources within its stewardship. Cultural resource management specialists are understandably reluctant to acknowledge that there are some resources the NPS cannot afford to care for. They are nevertheless best able to evaluate which resources are imperative to preserve, to determine whether existing information is adequate for informed decision-making, and to recommend what additional information is needed.

Resource preservation in the NPS has been driven largely by park legislation and the specific desires of park management and cultural resource management specialists. To effectively protect cultural resources, employees must look beyond individual resources and consider the resource preservation problem on a park-, cluster-, and system-wide basis in determining how to set priorities.

Desired Outcomes

The NPS will consult with employees, state historic preservation officers, community leaders, and interested citizens

- to identify those resources on which to focus NPS attention to ensure that the most significant resources are protected, and to identify achievable levels of protection;
- to identify those resources that the NPS cannot protect now, and perhaps ever;
- to develop plans to encourage others to protect those resources the NPS cannot protect, and to identify acceptable treatment levels for them;
- to identify those resources for which no other protection can be found;
- to ensure that field managers have authorities and flexibility to create opportunities for others to protect and interpret significant resources; and
- to ensure that available funds and staff are used in the most effective ways to

meet park, cluster, field area, and system-wide priorities.

Guiding Principles

- Priorities will be set within park, cluster, field area, and national contexts, as appropriate.
- The most significant structures representing the full range of cultural resource themes, contexts, and structure types in the system will receive priority.
- Activities and actions that relate directly to a park's purpose and significance as defined by legislation or evaluation within relevant historic contexts will receive priority.
- Activities and actions given priority must be achievable in the face of diminishing funds and staff.
- Priority decisions will be based on the best data currently available while the process of gathering and reevaluating data continues.
- Where feasible, historic structures will be used to meet park needs before new construction occurs.
- Structures will be brought to minimum sustainable levels of preservation before more costly treatments are pursued for them.
- Structures will not be restored unless uses have been identified for them and operating and maintenance funds are certain to be forthcoming.
- Reconstructions are prohibited.
- Other appropriate means beyond federal appropriations will be sought to accomplish needed actions and activities.
- Real estate and personal property will not be acquired unless they relate directly to a park's purposes and significance.
- Management of structures will be accomplished as efficiently as possible, without allowing procedure to overshadow objectives.
- Managers will be held personally accountable for managing structures according to these principles.

The Process

Application of the foregoing principles will take the NPS to a new level of resource management by strategically focusing available preservation capability on what is most important.

Two distinctly different parts of the NPS in geographically diverse locations developed and tested models to implement these principles and measured resulting changes from existing backlogs. Coastal masonry fortifications in the Southeast and ancestral Puebloan architecture of the Four Corners volunteered as test cases. In Appendix C is the Southeast Coastal Fortification test case.

OPTION RECOMMENDATIONS

The NPS uses park historic structures including buildings for administration and maintenance functions, to house employees, and for visitor access, orientation, and interpretation activities. Park historic structures are also used by concessionaires to provide visitor facilities and services. However, even after these functions are accommodated, there are historic structures that could be put to a use by others if preservation funding was available.

Therefore, the Associate Director, Cultural Resource Stewardship and Partnerships, consulted with a number of national and park partners and other stakeholders to advise on other options for preserving park historic structures. See Appendix F for a list of consulted individuals. The desired outcome of this consultation was to develop a shared understanding of the status of historic structures in the National Park System, an agreement on principles for setting preservation priorities, and recommendations on optional partnership preservation methods.

The consulted individuals recommended that the NPS should give greater emphasis to implementing the following four partnership options. They also recognized that regardless of the partnership option used, government financial participation will be required.

PARTNERSHIP OPTIONS

Cooperative agreements and other partnership arrangements including interagency agreements with other government agencies existing authority in Omnibus Consolidated Appropriations Act for Fiscal Year 1997, Pub. L. 104-208, September 30, 1996.

- Implement the additional cooperative agreement authority in the fiscal year 1997 omnibus appropriations act based on the premise that resource preservation is a park program in support of a public purpose.

  > In the past, the NPS has had limited authority to use cooperative agreements to allow partners to help preserve park historic structures. The fiscal year 1997 omnibus appropriations act gives the NPS the authority to "enter into cooperative agreements that involve the transfer of National Park Service appropriated funds to State, local and tribal governments, other public entities, educational institutions, and private nonprofit organization for the public purpose of carrying out National Park Service programs..."

- Develop a decision tree to determine when to use cooperative agreements and when to use leases and to determine the length of a cooperative agreement and its termination clause.

- Create a clearinghouse of model cooperative agreements and case studies.

- Make the process of establishing cooperative agreements open and public, establish clear program objectives to justify the sole source, and conduct cost benefit analysis.

- Establish performance measures and evaluate cooperative agreements on a biannual basis.

- Discuss with GSA the possible use of additional historic buildings under an interagency agreement for government offices.

Leasing (See Appendix D for a detailed program review and recommendations.) existing authority in Pub. L. 96-515, title II, § 207, December 12, 1980, 94 Stat. 2997, 16 U.S.C. § 470h-3a,b, 36 C.F.R. 18, and Pub. L. 90-401, § 5, July 15, 1968, 82 Stat. 356, 16 U.S.C. § 460l-22a,d, 36 C.F.R. 17.

- Renew request for a general leasing authority to allow packaging historic and non-historic properties and to retain lease proceeds.

  In May 1995, the Secretary of the Interior asked the Congress for expanded authority to lease all park real property, to retain half of the income for park purposes, and to adjust the rental by taking into account any amounts expended by the lessee for preservation, repair, etc. This proposed legislation would allow packaging of historic and non-historic properties into economically viable leases and therefore could preserve additional historic structures. To date this authority has not been enacted. Existing authorities are restricted to historic properties or properties in certain types of parks, or do not allow for the retention of lease proceeds.

- Establish a servicewide real estate team to provide expertise to park superintendents including pre-solicitation, marketing, lease negotiation, and coordination with the Interior Solicitor's Office.

- Set up a pre-solicitation expense fund.

- Consider potential for leasing real property during General Management Plan development.

- Examine master leasing opportunities for bundled properties.

- Develop a systemwide business plan for leasing that documents saved revenues for treatment and maintenance.

Conveyance of historic structures and property to private individuals and organizations existing authority in Pub. L. 90-401, § 5, July 15, 1968, 82 Stat. 356, 16 U.S.C. § 460l-22a,d, 36 C.F.R. 17.

- Investigate the advantages and disadvantages of seeking legislation to allow conveyance of real property in national parks, monuments of scientific importance, and properties that were always federally owned in appropriate situations where resource protection would be enhanced.

  16 U.S.C. § 460l-22 authorizes the Secretary of the Interior to convey a freehold interest in park real property with appropriate easements except in national parks, monuments of scientific importance, and properties that were always federally owned. Such interest shall be sold to the highest bidder and shall be for not less than fair market value. Proceeds received from any conveyance shall be deposited in the Land and Water Conservation Fund in the Treasury. This authority has been used and will continue to be used on a very limited basis. Most recently this authority was used to sell a small historic residential building and an acre of land in Cuyahoga Valley National Recreation Area during the summer of 1996. Many historic structures for which there is insufficient preservation funding are located in those types of parks or on those lands excepted from this authority.

- Establish centralized real estate expertise to advise parks.

- Develop conveyance process description and case studies.

- Make training on process and real estate available to NPS employees.

- Review park Land Protection Plans and revise if appropriate.

Philanthropic support

- Strongly encourage park superintendents to work with national and park partners to pursue actively additional philanthropic support for historic structures.

  Additional philanthropic support is needed to provide a portion of the large amount of funding that is required to supplement appropriated funds to preserve park historic structures.

- Build stronger links in the community at large.

- Encourage and expand park friends groups.
- Create improved information base on project costs to articulate and quantify needs and describe in one document.
- Conduct public awareness campaign to show the scope of the problem and success stories.
- Include in-kind services and dollar donations.
- Find better methods of recognizing donors.

APPENDIX A

President's Memorandum of April 22, 1996

Memorandum of April 22, 1996

Facilitating Public-Private Partnerships for Protection of the National Parks

Memorandum for the Heads of Executive Departments and Agencies

Many important efforts are already underway in which the private sector works in partnership with government to protect or maintain public lands. These include the work of the National Park Foundation, an organization created by the Congress in 1967 to receive private gifts and make disbursements to benefit the parks; cooperative agreements between the private sector and State and local parks to share resources and equipment and to provide valuable services, including maintenance services, to the parks; and agreements with willing private parties to acquire conservation easements. In an effort to ensure that the public-private partnerships that can enhance park protection and maintenance are as effective as possible, I hereby direct the following action:

1. The Secretary of the Interior is to provide to me, within 30 days, a specific proposal for ways in which the National Park Foundation's role in fostering public-private partnerships on behalf of the parks can be invigorated through either administrative or legislative action.

2. The Secretary of the Interior is to provide to me a legislative proposal that would make permanently available to the National Park System the authority to enter into cooperative agreements on behalf of the parks. This proposal should be consistent with the temporary authority that would be provided by enactment of my 1997 budget proposal as submitted to the Congress.

3. The Secretary of the Interior is to provide a report to me within 6 months on options for preserving historic structures within National Parks. This report should consider the possibilities for partnerships with businesses, associations, and individuals in the private sector.

4. The Secretary of the Interior shall work with the Congress to pass legislation that would allow the implementation of the 1995 National Park Service study to protect vistas surrounding Point Reyes National Seashore, California, while retaining existing private uses through actions including the purchase of conservation easements from willing private sellers. The Secretary of the Interior shall also give priority to funding such purchases from existing funds should authorization for such purchases be enacted. In addition, to the extent permitted by law and within existing budget authority, the Secretary shall exercise his existing authority to make a minor boundary adjustment as necessary to carry out the purposes of the National Park Service study to add property to Point Reyes National Seashore prior to enactment of such legislation, and to make available an amount of funds not to exceed $1 million to purchase such property from willing sellers.

This memorandum shall be published in the Federal Register.

William J. Clinton

THE WHITE HOUSE,
Washington, April 22, 1996.

APPENDIX B

Status Definitions

STATUS DEFINITIONS

Treatment

Stabilization: action to render an unsafe, damaged, or deteriorated property stable while retaining its present form.

Preservation: the act or process of applying measures to sustain the existing form, integrity, and material of a historic structure, landscape or object. Work may include preliminary measures to protect and stabilize the property, but generally focuses upon the ongoing preservation maintenance and repair of historic materials and features rather than extensive replacement and new work. For historic structures exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

Rehabilitation: the act or process of making possible and efficient compatible use of historic structure or landscape through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural and architectural values.

Restoration: a) the act of process of accurately depicting the form, features, and character of historic structure, landscape, or object as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period; b) the resulting structure, landscape or object.

Reconstruction: a) the act of process of depicting, by means of new work, the form, features, and detailing of a non-surviving historic structure or landscape, or any part thereof, for the purpose of replicating its appearance at a specific time and in its historic location; b) the resulting structure, landscape, or part thereof.

Condition

For prehistoric or historic ruined structures, the assignment of condition should be based on the goal of maintaining the character, material, and stability of the structure as acquired, excavated, or existing.

For all other structures, condition is categorized and defined as follows:

Good: The structure and significant features are intact, structurally sound, and performing their intended purpose. The structure and significant features need no repair or rehabilitation, but only routine or preventive maintenance.

Fair: The structure is in fair condition if either of the following condition is present: a) There are early signs of wear, failure, or deterioration though the structure and its features are generally structurally sound and performing their intended purpose; or b) There is failure of a significant feature of the structure.

Poor: The structure is in poor condition if any of the following conditions is present: a) The significant features are no longer performing their intended purpose; or b) Significant features are missing; or c) Deterioration or damage affects more than 25% of the structure; or d) The structure or significant features show signs of imminent failure or breakdown.

Unknown: Not enough information is available to make an evaluation.

Impact Level

An impact is a detectable result of an agent or series of agents having a negative effect on the significant characteristics or integrity of a structure, and for which some form of mitigation or preventative action is possible.

The impact level and their definitions are given below. For all levels, except "unknown," two criteria are given. At least one of the criteria must be met for the declared impact level.

Severe: a) The structure will be significantly damaged or irretrievably lost if action is not taken within two (2) years. b) There is an immediate and severe threat to visitor or staff safety.

Moderate: a) The structure will be significantly damaged or irretrievably lost if action is not taken within five (5) years. b) The situation caused by the impact is potentially threatening to visitor or staff safety.

Low: a) The continuing effect of the impact is known, and will not result in significant damage to the structure. b) The impact and its effects are not a direct threat to visitor or staff safety.

Unknown: a) Not enough information is available to make an evaluation.

Significance

National: Individual structures that qualify as national historic landmarks, are listed in the National Register as nationally significant, or that possess national significance by act of Congress or executive order.

Contributing: Structures that do not posses national significance on an individual basis, but contribute to the national significance of a park or historic district.

State: Structures that individually or collectively qualify for the National Register and possess significance at the state level.

Local: Structures that individually or collectively qualify for the National Register and possess significance at the local level.

Not Evaluated: Structures known through direct observation, survey, testing or inventory but which do not have National Register documentation indicating their significance.

Not Significant: Structures known not to be significant but which are managed as cultural resources because of a decision to do so documented in the planning process.

Management Category

Management category is a compilation of legislative mandates and policy considerations indicating management's evaluation of significance, use, condition, and location of the structure.

Category A: Structures that must be Preserved and Maintained.
A structure meeting any of the following criteria must be classified in Category A:

- the structure's preservation is specifically legislated;
- the structure is related to the park's legislated significance;
- the structure is nationally significant as defined by the National Historic Landmark criteria;
- the structure is less that nationally significant, but contributes to the park's national significance;
- the structure is a prehistoric structure.

Category B: Structures that should be Preserved and Maintained .
A structure must meet all of the following criteria individually in Category B (failure to meet any of the conditions moves it to a lower category):

- the structure may meet the National Register criteria individually or as contributing element of a site or district;
- the structure is not incompatible with the park's legislated significance;
- the structure has a continuing or potential use based upon design and location.

Category C: Structures that may be Preserved or Maintained
Either of the following conditions places a structure in Category C:

- the structure may meet the National Register criteria individually or as a contributing element of site or district, but because of condition, location, or

other factors does not qualify for Category B;

- the structure does not meet the National Register criteria, but a decision has been reached through the planning process to manage the structure as a cultural resource.

Category D: Structures that may be or have been disposed of; altered for some other management purposes; or have been destroyed by natural forces or by accident.
A structure that meets <u>any</u> of the following criteria may be placed in Category D:

- the structure is an irreparable hazard to public health and safety;
- the structure has lost its historical integrity;
- the structure is a physical or visual intrusion on the park's legislated significance;
- the structure has been disposed of by planned action or destroyed by natural forces, or accident.

APPENDIX C

Prioritization Test Case: Southeast Coastal Fortifications, August, 1995

United States Department of the Interior

NATIONAL PARK SERVICE
Fort Sumter National Monument
1214 Middle Street
Sullivans Island, South Carolina 29482
(803) 883-3123

IN REPLY REFER TO:

August 1, 1995

Memorandum

To: Kate Stevenson, Associate Director for Cultural Resources
Geraldine Smith, Chief, Office of Policy

From: John Tucker, Superintendent, Fort Sumter National Monument

Subject: Historic Preservation Priorities

With the increasing demand on limited NPS funding, the need to provide guidance in setting historic preservation priorities has become more critical than at anytime in NPS history. From our initial Work Group on Priorities for Historic Structures meeting in Washington last Spring, thirteen guiding principles were developed to assist managers in allotting preservation funds for historic structures. You asked me to coordinate a test of the guiding principles by developing a model to determine how funds might be allocated to preserve coastal masonry forts in the Atlantic Coast Cluster.

After discussing this proposal with Kirk Cordell and Paul Hartwig, we decided to include the Gulf Coast Cluster to see how the program might work across cluster boundaries. I asked Superintendent John Breen of Fort Pulaski to coordinate this test within the Southeast Field Area. Originally, the term "coastal forts" was not defined so John and I agreed to limit the test to coastal masonry forts and Endicott Batteries. John was given the Washington Work Group report with little additional direction as though it had been issued for implementation by a higher authority. Two members of the Washington work group, Mr. Baker and Mr. Cordell, briefly attended Superintendent Breen's Coastal Forts Work Group meeting to provide some additional instructions. Essentially, John completed the task with little external input.

Superintendent Breen's report is attached. As you will note, he assembled data, photographs, and maps from the eight test parks to assist his work group in evaluating each site. This was necessary to help each member reach a minimum understanding for each structure evaluated. Also, this is reflective of our changing management style as the Service moves to Cluster operations with management using park employees to make decisions. Generally, park employees are less traveled than "Regional Office" employees.

Testing this model has engendered much discussion about how and when the program will be implemented. Many topics have been discussed such as, "In what budget cycle will implementation occur? How real is this? We can't let this or that fort fall into disrepair." This indicates a high level of employee concern for park resources. To insure acceptance by NPS employees, we need to include diverse groups of our employees in developing and implementing the final recommendations.

The participation of external organizations will be necessary. It is troublesome that State Historic Preservation Office staff agreed to participate in the Atlanta meeting but failed to attend. The reason for their absence must be determined before we proceed. Although no external organizations or Friends groups were asked to participate in the pilot program, they must be active participants in the development of this program as well. Coordination with these external groups is paramount to the success of the program.

Setting priorities for historic structures will be a sensitive political issue. Few members of Congress may be willing to justify to his constituents why he is allowing the NPS to diminish historic property maintenance or not to proceed with restoration plans in his district. Are we as an organization ready to take this issue to the political arena and make the hard decisions? If we do not have consensus, the budget "add on" process will eliminate any gains anticipated from the program.

Superintendent Breen and his Coastal Forts Work Group members are to be complimented on their professional effort and willingness to attempt this challenging assignment.

John Tucker

Enclosure

cc:
Field Director, Southeast Area
Associate Director, Cultural Resources, Southeast Area
Superintendent, Atlantic Coast SSO
Superintendent, Gulf Coast SSO
Superintendent, FOPU

PRESERVATION PRIORITIZATION

FOR

SOUTHEAST COASTAL FORTIFICATIONS

Table of Contents

Introduction 34

Description of Fortification 34
Fort Sumter 34
Fort Moultrie 36
Fort Pulaski 37
Fort Jefferson 38
Fort Pickens 39
Fort Barrancas 41
Advanced Redoubt 42
Fort Massachusetts 43

Setting Preservation Priorities 44

Preservation Matrix 45

Testing The Guiding Principles For Historic Preservation 47

Conclusions 50

List of Participants 51

Introduction

The National Park Service has always taken pride in being one of the premiere historic preservation agencies in the Nation. Today in the face of reduced funding, the Service must redesign its method of setting preservation priorities to ensure that the most significant resources are adequately addressed. It is vital that long range, broad based, rational criteria be developed for making these important decisions.

On March 13, 1995, the Deputy director asked the Associate Director, Cultural Resources, and the Chief, Office of Policy, to develop a paper addressing this issue and to provide guidance for setting historic structure preservation priorities. On April 26-27 a Work Group responded to this challenge by developing a set of Guiding Principles to be used in setting preservation priorities.

This report evaluates a test of the Guiding Principles as they relate to the preservation of coastal masonry fortifications in the southeast. On July 11-12 a Southeast Field Area Work Group was formed of park representatives and cultural resource specialists to develop a method of determining the relative significance of each fortress, and the appropriate level of treatment. It was determined that it would be more logical to evaluate "like" resources rather than to try to establish one set of criteria for evaluating all coastal fortifications from the early Spanish period to WW-II.

The sites included in this report are the second and third system fortifications within the Southeast Field Area: Fort Sumter, Fort Moultrie, Fort Jefferson, Fort Pickens, Fort Barrancas, Fort Massachusetts, Advanced Redoubt and Fort Pulaski. In addition, an evaluation and treatment strategy was developed for the Endicott, WW-I and WW-II coastal defenses as a separate exercise.

Description of Fortifications

Fortification: Fort Sumter - Battery Huger

Construction began on Fort Sumter, a third system fort, in 1829 and was only 90% complete by the opening shots of the Civil War. As the site of the longest siege in American military history, (22 months) much of the five-sided structure was reduced to rubble. After the Civil War, the Army Corps of Engineers relocated the Sally port, rebuilt a number of casemates and converted others to magazines.

In response to the Spanish American War, a massive, multi-level Endicott battery measuring 270' x 90' x 22' was built in the center of the parade ground, occupying roughly 1/4 of Fort Sumter's interior space. Almost 1/3 of the Fort's gorge wall was reconstructed as the South end of Battery Huger. A fill area measuring 270' x 160' lies

between Battery Huger and the fort's left face wall.

The structure varies in height from 10' to 25' with wall width ranging from 5' to 7'. Battery Huger provides an area for basic visitor services (museum, restrooms, water fountain, first aid and maintenance storage).

Legislation: 62 Stat. 204. Fort Sumter was established by a Joint Resolution of Congress on April 28, 1948. The legislation states that the Monument is to be "a public National Memorial commemorating historical events at or near Fort Sumter." The 1974 Master Plan states "the quality of the visitor's interpretive experience would be enhanced with the removal of Battery Huger and its protective earth fill. It is not proposed that Fort Sumter be restored to its 1860 condition....the fort should be maintained as a semblance of its damaged state following the close of Union Bombardments in 1865."

Current Planning: A new General Management Plan (GMP) is being developed for Fort Sumter NM, including Fort Moultrie. The Management Objectives workshop was held in November 1994, and the GMP is expected to be complete by Winter 1996-97.

Current Condition: After acquiring the site in 1948, modern Army structures were removed and the parade ground and first tier level excavated back to their Civil War depth. Cyclic repointing has taken place since then with the most recent major work occurring in 1993. Serious cracking in several casemate arches brought about an engineering study in 1991-92 followed by three distinct treatments to the most serious problems. One arch was rebuilt, an 1870's retaining wall rebuilt to stabilize another, and epoxy injections were used in the third to bring the arch back into compression. Overall, the exposed masonry portions are in fair condition.

Rip-rap covers the exterior foundations. Wave and tidal action constantly batter the fort's lower exterior walls. It is speculated that the mortar at the water line is deteriorating and will begin to fail. Wave action through the rip-rap and foundation causes significant vibrations to the exterior walls and associated features.

Battery Huger's exterior walls continue to crack and are periodically coated and patched with sealants. Numerous leaks occur in the upper and lower levels from water draining through the exposed surfaces as well as the back fill material, leaking in below the exposed surface of the battery. A 1992 Army Corps of Engineers study determined that Battery Huger is having no adverse effect on the structural elements of Fort Sumter and that it could be removed, at a cost of approximately 5 million dollars, without damaging the masonry structure. However, given its island setting, no other location exists for the necessary visitor support services housed in Battery Huger.

Accessibility: Fort Sumter is accessible only by boat.

Current Preservation and Construction Backlog: An Historic Structures Assessment Report was prepared for Fort Sumter in 1992. The RMP identified the need for an HSAR/ICAP/HSPG for Battery Huger, Fort Moultrie and Battery Jasper. Additional RMP research needs include: conduct research on the rip-rap and foundation for Fort Sumter, investigate the dirt fill adjacent to Battery Huger and conduct an inventory of Fort Sumter's underwater archeological resources (125 acres) and rehabilitating the Fort Sumter sewage system.

A decision regarding the removal of Battery Huger has not been made.

Significance: Fort Sumter has National significance as a National Register site and Battery Huger is classified as a contributing element to Fort Sumter's significance.

Fortification: Fort Moultrie -

Fort Moultrie, a second system fort built in 1809, saw continuous service through World War II. Earth covered powder magazines were built in the parade ground during and after the Civil War, three Endicott period gun emplacements were added inside the fort in 1898 and a concrete Harbor Entrance Control Post-Harbor Defense Command Post (HECP-HDCP) was added within the fort's walls in 1943. The irregularly shaped fort has a brick exterior perimeter of 450' and a variety of construction materials on the interior including brick, concrete, wood, concrete block, earth and stone.

Legislation: The National Park Service accepted jurisdiction of Fort Moultrie on September 7, 1960, under the authority of the Antiquities Act of June 8, 1906, and the Historic Sites Act of August 21, 1935. No other legislation exists for the site. It is operated as a unit of Fort Sumter NM.

Current Planning: The 1974 Master Plan states "The concept for preservation and use here should be to tell the story of the evolution of this complex and to show how and why the complex's characteristics changed as the concept of coastal fortifications changed. The revised GMP underway for Fort Sumter will include Fort Moultrie.

Current Condition: Major rehab/reconstruction work took place at Fort Moultrie in 1974-75 in preparation for the bicentennial of the American Revolution. Archeological excavations brought the parade ground down to the 1809 era. Regular repainting and repointing have kept most of the structure in good shape. The HECP-HDCP is partially furnished, but lacks a climate control system in the upper floors. This, coupled with continued insect attack and some material failures, is quickly affecting the structure's interiors.

Accessibility: Fort Moultrie is reachable by vehicle, public transportation, and walkup.

Current Preservation and Construction Backlog: Long-term preservation needs include climate control and stabilization of the HECP-HDCP, stabilizing the Fort Moultrie mounds and repairing the vapor barriers to tunnels below.

Significance: Fort Moultrie has National significance as a National Register site. The List of Classified Structures (LCS) includes 21 separate contributing architectural elements within the fort's walls.

Fortification: Fort Pulaski -

Constructed between 1829 and 1847, this Third System masonry fortification is a five-sided brick structure 1,508 feet in circumference, with walls 7 to 11 feet thick and 32 feet high, surrounded by a wet moat and earthen dike to prevent flooding. Here, on April 11, 1862, newly developed rifled cannon first overcame a masonry fortification, making such forts obsolete.

Legislation: 43 Stat. 1968. Preservation of the fort was the primary reason for establishing the monument by presidential proclamation on October 15, 1924. It consisted of "the entire area comprising the site of the old fortifications which are clearly defined by ditches and embankments, which enclose about twenty acres." The monument was transferred to the National Park Service by executive order No. 6166, dated June 10, 1933. Later additions to the monument did not address historic structures.

Current Planning: The Master Plan approved June 1971, addressed preservation of the fort in two places. First in the overall Objectives section the plan states, "... preserve the historic fabric and architectural beauty of Fort Pulaski which is virtually unaltered from its original design." The second reference states, "Protect Fort Pulaski from deterioration by making repairs promptly, using matching materials and methods."

Current Condition: Between the years 1869 and 1872 the Corps of Engineers remodeled the demilune by constructing underground magazines, passageways and emplacements for heavy guns. From 1933 to 1942 major restoration work was completed on the fort by the Civilian Conservation Corps. In 1993 and 1994 SER Preservation Masons repointed the exterior gorge wall, southwest bastion, one gorge room, all fort chimneys, and the exterior walls of the demilune; replastered the demilune magazines and connecting tunnels; and repaired the parade ground walkway. Other significant projects include replacement of the underground power cable to the fort, installation of a fire/security alarm system, replacement of damaged floorboards and replacement of lead sheeting over a staircase. There have been several projects involving repainting and replastering historic surfaces. Today it is one of the best preserved Coastal masonry forts in the nation, requiring only relatively minor preservation maintenance such as painting, repointing, replastering and replacement of damaged non-historic fabric.

Accessibility: Fort Pulaski is reachable by vehicle, public transportation, and walkup.

Current Preservation and Construction Backlog: The RMP identifies two research needs, a Historic Structures Report and Historic Preservation Guide. These documents would guide management in the proper preservation of the fort for the future. Other regular and recurring preservation needs include: repainting the fort veranda, gorge rooms, casemate doors, and flagpole; repointing mortar joints and replastering surfaces as needed. Long term preservation needs include restoration of the historic dike, stabilization of the sallyport doors, and replacement of the fort's plumbing.

Significance: Fort Pulaski is listed as having National significance on the National Register along with it's associated structures including the moat and demilune. The historic dike, tide gate and feeder canal are considered as contributing to the significance of the fort.

Fortification: Fort Jefferson -

The Army began building Fort Jefferson in 1846 and worked on it over the next 28 years. The lower level of casemates was completed and armed, as was the terreplein gun deck, however, the middle tier was never finished. It is a massive hexagon adjusted to the irregular island shape, with a narrow bastion at each angle. Four fronts are 476 feet long and two are 325 feet; the perimeter is nearly half a mile. The fort is located on Garden Key at the end of the long curving chain of Florida Keys. It was the largest of the coastal forts built to defend the shores of the United States. During the Civil War it became a prison, and after the war contained several individuals involved in the Lincoln Assassination, including Dr. Samuel Mudd. The fort was never engaged in battle, but it stands today as a fine and remarkably complete example of a nineteenth century fortification.

Legislation: 106 Stat. 3441. Dry Tortugas National Park which contains Fort Jefferson was established by Public Law 102-525 on October 26, 1992. Section 202 indicates that one purpose of management is "To protect, stabilize, restore, and interpret Fort Jefferson, an outstanding example of nineteenth century masonry fortification."

Current Planning: When the National Park was established, replacing Fort Jefferson National Monument, the enabling legislation increased from "preserving" to "protect, stabilize, and restore."

Current Condition: The major causes of the fort's deterioration problems are: exfoliation of the metal framing of the gun ports, leakage of water down from the terreplein, and deterioration of the masonry from the atmosphere. The iron buried in the brick surrounding the gun ports is rusting and the resultant expansion is pushing the outer layer of brick away from the wall. In some places the brick has already fallen away,

while the bricks around some of the ports are bulged out like huge blisters. Water seeps down from the terreplein through the walls of the fort leaching mortar from between the bricks. In a number of places on the first and second level stalagmites and stalactites are forming from the lime in the mortar. This erosion is weakening the walls of the fort. On the parade exposure, some of the casemates are bricked up for NPS residential quarters or administrative facilities.

Accessibility: Fort Jefferson is accessible only by boat or seaplane.

Current Preservation and Construction Backlog: During the last three years several sections of the outer wall have collapsed. Funding was obtained in FY-95 to remove the steel embrasures from several of the gunports and rebrick the openings. The moat wall was damaged in a winter storm in 1994 and funds have been obtained to repair the wall in FY-95. Much of the current preservation work involves maintenance of the quarters, water systems and generator systems to support the employees living in the park and to provide for basic sanitation for park visitors. Plans for the next four to five years include developing new quarters in the fort for employees, and resealing the top level of the fort to prevent water from percolating down through the walls causing the walls to weaken.

Significance: Listed on the National Register as a Nationally Significant structure.

Fortification: Fort Pickens - Battery Pensacola

The fort is a brick masonry and earth construction shaped as a pentagon and built by the United States from 1829 to 1834 on the western tip of Santa Rosa Island. A large, two-tiered fort, its planned 250 gun armament was intended to cover the approach and passage into Pensacola Bay, and also included land defense features. It sustained minimal battle damage during the Civil War but major accidental damage in 1899 when one of its magazines exploded, destroying the northwest bastion.

Also in 1899, the 12" (DC) Battery Pensacola was constructed in the center of the old fort. To improve the field of fire from the battery, the ramparts of Fort Pickens along one channel front, one curtain wall, and three bastions were lowered and in the process a number of casemates collapsed. Through most of the first half of the 20th century additional modifications were made to the old fort by the army.

Legislation: Gulf Islands National Seashore was authorized by Congress in the Act of 8 January 1971 **(P.L. 91-660, 84 STAT. 1967, 16 U.S.C. 459h)** as amended in 1972, 1976 and 1978. In part, the act states: "In order to preserve for public use and enjoyment certain areas possessing outstanding natural, historic, and recreational values, the Secretary of the Interior...may establish and administer the Gulf Island National Seashore." Section 5 of the Act states in part: "With respect to Fort Redoubt, Fort San

Carlos, Fort Barrancas at Pensacola Naval Air Station, Fort Pickens on Santa Rosa Island, and Fort McRee on Perdido Key, Florida, and Fort Massachusetts on Ship Island, Mississippi, together with such adjacent lands as the Secretary may designate, the Secretary shall administer such lands so as to recognize, preserve, and interpret their national historical significance in accordance with the Act of August 21, 1935 (49 STAT.666; 16 U.S.C. 461-467), and he may designate them as national historic sites."

The 1972 Deed conveying Fort Pickens from the State of Florida to the U.S. Department of Interior, National Park Service, states in part: "The ...described lands are being acquired for the National Park Service of the United States Department of the Interior for inclusion in the Gulf Islands National Seashore and perpetual use for public recreation purposes. It is further understood that the National Park Service will take steps as soon as possible to stabilize Fort Pickens, and will continue to seek funds for actual restoration of the fort as circumstances might permit".

Current Planning: In 1978, the General Management Plan for Gulf Islands included the following management objectives for cultural resource management: "To identify, evaluate, protect, and preserve the Seashore's cultural resources in accordance with legislative and executive requirements and National Park Service's historic preservation policies. To preserve Fort Pickens, Fort Barrancas, Advanced Redoubt, Fort Barrancas Water Battery, thirteen batteries and other historic resources of the coastal defense system in Fort Pickens Historic District, Fort Massachusetts Historic District, and Pensacola Forts Historic District, and to stabilize cultural resources for public appreciation of the historic significance of the coastal defense system of fortification". Similar language and objectives are expressed in the Statement For Management, Resource Management Plan, and the 1993 Management Objectives Workshop.

Current Condition: Some of the War Department alterations were removed in the 1975-1976 stabilization project by the National Park Service, and some restoration work was performed in the north front casemates and on the northwest channel front ramparts. In 1989, the sallyport and adjoining casemate were paved and in the following year the casemate was adaptively rehabilitated for use as a visitor contact station. In 1991, the lead sheeting covering the arches of the north front was repaired. In 1994, repair work commenced on selected areas of the fort under a MOU with the Federal Bureau of Prisons. To date, the inmate crew has accomplished repairs to the parade face of Bastion A, two damaged arches and adjoining walls in Bastion B, and banquette and BH wall of the northwest channel front. Current work is concentrated on cleaning, repointing, and replacing damaged masonry sections of the counterscarp wall. While some areas of the fort are currently stabilized, much work remains to be done on the outer wall where crumbling masonry continues to deteriorate. The lead sheeting has begun to shift again and requires patching and repair. Major, additional repointing work has yet to be accomplished. Overall, the condition of the fort is fair to poor. Vandalism is a threat to the resource as the structure cannot be secured with one corner missing.

Battery Pensacola, c1899, located in the center of Fort Pickens, was stabilized in 1984. It is threatened by time, weather and vandals.

Accessibility: Fort Pickens is reachable by vehicle, public transportation, and walkup.

Current Preservation and Construction Backlog: Planned projects involving the fortification include water proofing, masonry repair, and restoration of earthworks pending availability of funds from the NPS and skilled craftsmen from the Bureau of Prisons.

Significance: Listed on the National Register as Nationally Significant structures or part of Historic Districts.

Fortification: Fort Barrancas -

The fort is a brick masonry and earth construction shaped as a four-sided, irregular polygon and built by the United States from 1839 to 1844 on the mainland bluff, or barranca, overlooking Pensacola Pass. It has a masking counterscarp with reverse fire galleries and flank casemates on the land approaches and is linked to the older Spanish water battery by subterranean passage. The main work is reached by a drawbridge over the ditch from the counterscarp and glacis and contains galleries, guard room and magazines. Its center mass of earth (forming the parade and ramparts) is held back from the scarp by an innovative system of relieving arches.

Actually an elaborate gun battery, Fort Barrancas contains no permanent quarters. It sustained little damage during the Civil War and was modified only slightly in subsequent years.

Legislation: The legislation governing Fort Barrancas is incorporated in the Act of 8 January 1971 (see Legislation for Fort Pickens).

Current Planning: Current planning for Fort Barrancas is addressed in the Current Planning section for Fort Pickens (see above).

Current Condition: Between 1978 and 1980, the National Park Service restored the fort and grounds to their circa 1860 appearance, cleaning, repairing, repointing, and waterproofing the masonry, and restoring or replacing wood fences, doors, gates, shutters, bridges, and magazine linings. The flag pole was erected in 1983. Current threats to the structure include new leaks that have opened up in some of the arch covering, warpage and swelling in doors, rot in one of the wood magazine linings, and periodic malfunctioning of the drawbridge machinery. Vandalism is an occasional threat. No major restoration work has been performed on the fort since 1980. The irrigation system poses some continuing concerns for leaks, grounds maintenance, and wall

staining.

Accessibility: Fort Barrancas is reachable by vehicle, public transportation, and walkup.

Current Preservation and Construction Backlog: Planned projects involving the fortification include water proofing, masonry repair, restoration of earthworks.

Significance: Listed on the National Register as Nationally Significant structure or part of Historic District.

Fortification: Advanced Redoubt -

The advanced Redoubt of Fort Barrancas is a brick masonry and earth construction shaped as a trapezoid and built between 1845 and 1859 to defend the land approaches to the Navy Yard at Tartar Point. It and Fort Barrancas form the permanent anchors of a line of defense that stretched from Pensacola Bay at the south end to a cove of Bayou Grande at the north end. Field works constructed in wartime would complete the line and link the two permanent works.

The Redoubt is constructed similarly to Fort Barrancas with masking, galleried counterscarp wall and a somewhat more elaborate system of relieving arches to sustain the central sand fill. Some of the detailed brick work in the Redoubt is of the highest order of craftsmanship. Although not involved in battle, the Redoubt has suffered from neglect and abuse over the years.

Legislation: The legislation governing Advanced Redoubt is incorporated in the Act of 8 January 1971 (see Legislation for Fort Pickens).

Current Planning: Current planning for Advanced Redoubt is addressed in the Current Planning section for Fort Pickens (see above).

Current Condition: At some point, the gorge wall was used as a backstop for a pistol range and is quite pitted from .45 calibre rounds. For many years, trees were allowed to grow from its ramparts. Clearing, cleaning and stabilization by the National Park Service in 1975-1976 restored the structure to its overall original form and appearance, but not to the detail of the work at Fort Barrancas. A new drawbridge and postern door were installed to secure the fortification. No major, additional restorative work has been done since 1976. Current threats include vandalism (a serious problem), sinkholes, and severe warping of the drawbridge.

Accessibility: The Advanced Redoubt is reachable by vehicle, public transportation, and walkup.

Current Preservation and Construction Backlog: Planned projects involving the fortification include water proofing, masonry repair, restoration of earthworks.

Significance: Listed on the National Register as Nationally Significant structure or part of a Historic district.

Fortification: Fort Massachusetts -

The fort is a brick masonry and earth construction shaped as an elongated semi-circle with gorge and built by the United States between 1859 and 1866 on the west end of Ship Island, Mississippi to protect the Ship Island pass and anchorage. It is two-tiered with magazines, guardrooms, cisterns, and circular stair towers leading to the ramparts. Workmanship is of a very high order. The uncompleted fort saw a very brief action in 1861 but suffered no serious damage.

Legislation: The legislation governing Fort Massachusetts is incorporated in the Act of 8 January 1971 (see Legislation for Fort Pickens).

Current Planning: Current planning for Fort Massachusetts is addressed in the Current Planning section for Fort Pickens (see above).

Current Condition: As with most coastal forts, Fort Massachusetts is threatened more by nature than by armed men. Overwash during tropical storms is a constant threat, as is erosion to the site at any season. The marine environment is a perpetual threat to iron components of the structure. In 1975-1976, a National Park Service stabilization project repaired the fort with waterproofing, grouting, repointing, and restoration of damaged masonry. The original, corroded iron embrasure shutters and frames were replaced by fiberglass reproductions. No major structural restorative work has been performed on the fort since 1976, although wood floors have been installed in both guardrooms, and preservation maintenance is being done on the fiberglass shutters. The single, most critical, current threat to the fort is erosion of the island from around the structure. In 1995, the Corps of Engineers, through an Interagency Agreement, began a formulation study to design an erosion control and storm damage reduction plan for Fort Massachusetts and the West Ship Island.

Accessibility: Accessible by boat only.

Current Preservation and Treatment Backlog: Planned projects involving the fortification include water proofing, masonry repair, restoration of earthworks, the replacement of Fort Massachusetts shutters and the development of a comprehensive plan for mitigating and monitoring shoreline erosion at Fort Massachusetts.

Significance: Listed on the National Register as Nationally Significant structure or part of Historic district.

Setting Preservation Priorities

In order to set priorities for resource preservation, a rating system was developed to measure each fort against weighted criteria. A Factor Weighting Value (FWV) of 1 to 5 points was assigned to each of the six following significance factors:

Significance Factors

I. Historical Significance - FWV 5 points

Historical significance was considered the most critical element and given the greatest weight. It took two things into consideration, 1) the event(s) of national historic significance that took place at the structure and 2) the nationally significant person(s) whose connection with the structure is an integral part of the site's national importance.

II. Architectural Significance - FWV 1 point

While an extremely important rating factor, it was given a low value for this exercise since the group of structures examined here were all coastal masonry forts. A higher factor weighting value might be assigned when evaluating a group of structures with fewer common architectural elements. The following factors were considered: innovative design or construction features and uniqueness as a structure (ie. first built of its type, the largest such structure existing, the only remaining structure of its type, or possessing outstanding craftsmanship).

III. Visitation - FWV 1 point

Visitation is worth considering when evaluating a group of structures, but given the broad range of methods used by parks in arriving at visitation figures and the fact that some parks are located in areas where visitation is incidental to other factors, i.e. the structure is not a visitor destination; it was given a low factor weighting value.

IV. Public Access - FWV 3 points

The ability for the average visitor to reach park sites is important in the public's ability to experience and learn about the resource. This element does not reflect handicapped access, but instead measures the level of difficulty visitors have in reaching the site due to remoteness or limited concessioner-provided access.

V. Condition of the Structure - FWV 3 points

Moultrie, Sumter, Pulaski and Barrancas have been restored to the desired preservation level as indicated by legislation and current planning documents. The other four forts would require additional large expenditures to bring them up to the desired level of restoration. The overall cost of preservation was a practical and important consideration in determining the factor weighting value.

VI. Integrity of the Primary Resource - FWV 3 points

The amount of remaining original fabric was an important factor in determining the factor weighting value. Some forts have been dramatically altered by succeeding additions, which influences the historic integrity of the structure.

Preservation Action Levels

Based on the results of the preservation prioritization process, four action levels were identified for the forts:

A - Preserve in Current State
Forts at this level of preservation included Moultrie, Sumter, Pulaski and Barrancas.

B - Minimum Stabilization Accepting Some Loss of Historic Fabric
Forts at this level included Jefferson, Pickens, Massachusetts and the Advanced Redoubt.

C - Restoration
No forts were identified for this level of preservation treatment.

D - No Preservation Treatment (No Action)
This level of treatment was deemed appropriate for the Endicott, WW-I and WW-II batteries. Battery Huger which is located within, and is a part of Fort Sumter, and Battery Pensacola which is located within Fort Pickens would receive the same level of treatment as the associated masonry fort.

Preservation Matrix

The following matrix was developed to measure and illustrate the significance of each fort and the level of action necessary to achieve the desired level of preservation.

A numerical rating from 0 to 5 was given for each of the six significance factors for each fort by consensus of the work group. A rating of 0 indicated that there was little or no

significance to the site, while a level 5 indicated a high level of significance. The numerical rating value was then multiplied by FWV points to determine the total resource significance value of each fort.

The level of preservation action was based on the total resource significance value for each site. A level - A (preserve in current state) action level was conferred on the four forts with the highest total significance value, while the four forts with the lowest significance value were assigned level - B (minimum stabilization). The Endicott, WW-I and WW-II batteries received a level - D (no preservation treatment - no action) rating, while none of the forts were given a level - C (restoration) rating.

RESOURCE NAME	CULTURAL RES. SIGNIFICANCE FACTORS I.	II.	III.	IV.	V.	VI.	Total	Level of Action
Fort Moultrie	2x5 10	2x1 2	3x1 3	5x3 15	4x3 12	4x3 12	**54**	A=Preserve in current state
Fort Sumter	5x5 25	2x1 2	4x1 4	4x3 12	2x3 6	2x3 6	**55**	A=Preserve in current state
Fort Pulaski	3x5 15	2x1 2	5x1 5	5x3 15	5x3 15	4x3 12	**64**	A=Preserve in current state
Fort Jefferson	3x5 15	4x1 4	1x1 1	1x3 3	1x3 3	3x3 9	**35**	B=Minimum Stabilization
Fort Pickens	2x5 10	2x1 2	3x1 3	5x3 15	1x3 3	2x3 6	**39**	B=Minimum Stabilization
Fort Barrancas	2x5 10	3x1 3	2x1 2	5x3 15	4x3 12	4x3 12	**54**	A=Preserve in current state
Advanced Redoubt	1x5 5	2x1 2	0x1 0	5x3 15	3x3 9	3x3 9	**40**	B=Minimum Stabilization
Fort Massachusetts	1x5 5	3x1 3	2x1 2	2x3 6	3x3 9	4x3 12	**37**	B=Minimum Stabilization

Testing The Guiding Principles for Historic Preservation

The Guiding Principles for Historic Preservation, as developed by the Washington Work Group, were compared with the results of the test model to evaluate southeast coastal fortifications. A discussion of each principle follows:

- Priorities will be set within park, cluster, field area, and national contexts, as appropriate.

  While for the purposes of this report only the masonry forts within the Southeast Field Area were considered, in order to truly evaluate and prioritize these similar resources, it would be better to include all third system masonry forts within the NPS.

- The most significant structures representing the full range of cultural resource themes, contexts, and structure types in the system will receive priority.

  The work group was able to establish a list of criteria to evaluate the relative significance of each site. Using a matrix with weighted criteria, priorities were established for preservation treatment. We found it was practical to evaluate "like" resources. We were unable to compare the significance of Spanish era forts with second and third system masonry forts, and the more modern Endicott, WW-I and WW-II structures.

  After developing the rating system and using it on these structures, it became evident that Fort Sumter, while agreed upon by the group as the structure with the greatest value to preserve in its current state, did not receive the highest numerical rating. Fort Sumter is unique among these structures in that it has been preserved as a "stabilized ruin." Using this rating system, such a structure receives low scores in Condition of the Structure and Integrity of the Primary Resource. In Fort Sumter's case, however, its shattered walls are its greatest interpretive value - the battered physical remains of the most symbolic structure of the Civil War.

- Activities and actions that relate directly to a park's purpose and significance as defined by legislation or evaluation within relevant historic contexts will receive priority.

  Since all the masonry forts were included in the legislation of the respective parks, and all are listed as being of National Significance on the Federal Register, this element doesn't apply to coastal masonry fortifications. However, their relevant historic contexts differ and these differences were reflected in the evaluation process using the weighted

criteria.

None of the Endicott Batteries that physically stand alone from any other structure were mentioned in enabling legislation and all were only contributing factors to the entire site's national significance. Therefore, a lower level of historic significance and of preservation action was determined to be appropriate for these resources.

- Activities and actions given priority must be achievable in the face of diminishing funds and staff.

  There was quite a bit of discussion concerning this element. It was agreed that in the case of masonry forts, activities and actions should not result in the need for additional funds or personnel, should be sustainable and must be cost effective.

- Priority decisions will be based on the best data currently available while the process of gathering and reevaluating data continues.

  In order to preserve historic fabric and prevent more costly future repairs, it was recognized that in some cases immediate, low cost, temporary measures must be taken to address critical situations. Managers are still responsible for ensuring the data gathering process continues and long term solutions are identified and applied.

- Where feasible, historic structures will be used to meet park needs before new construction occurs.

  While there has been some adaptive use of portions of coastal forts, these structures do not readily lend themselves to adaptive use as well as some other historic structures. In many cases the fort is the primary resource of the park. Any adaptive use must be carefully scrutinized to ensure there is no inappropriate use of the most significant historic structure within a park.

- Structures will be brought to minimum sustainable levels of preservation before more costly treatments are pursued for them.

  This process is especially important to coastal forts. Due to the large size, age and present condition of these structures, in many cases the only economically feasible measure is to provide minimum stabilization while accepting some loss of historic fabric.

- Structures will not be restored unless uses have been identified for them and operating and maintenance funds are certain to be forthcoming.

  The work group felt that preservation treatment measures for coastal forts should be limited to: preservation in current state, minimum stabilization (accepting some loss of historic fabric), and no action. It was agreed that additional restoration would not be appropriate nor cost effective.

- Reconstructions are prohibited.

  It was agreed that reconstruction of buildings would not be appropriate, however, reconstruction of elements of historic fabric (ie. rotted wood, damaged metal or brick) would be appropriate to protect historic fabric and/or enhance public understanding and appreciation.

- Other appropriate means beyond federal appropriations will be sought to accomplish needed actions and activities.

  This principle applies to all cultural and natural resources including coastal forts.

- Real estate and personal property will not be acquired unless they relate directly to a park's purposes and significance.

  Since the National Park Service already owns the forts in their entirety, this principle is not as applicable as it might be with other resources such as battlefields or natural features.

- Management of structures will be accomplished as efficiently as possible, without allowing procedure to overshadow objectives.

  This principle is very applicable to masonry forts. Management must be given the latitude to accomplish important objectives without being encumbered by complicated processes and procedures.

- Managers will be held personally accountable for managing structures according to these principles.

  Managers must be accountable for managing structures within their park, and share in the accountability for those within the cluster, field area, and service as well.

Conclusions

The scope of this report was limited to masonry coastal fortifications because they are similar in respect to period, architecture and building materials. However, it became extremely difficult to evaluate the significance of other types of coastal fortifications in relation to the masonry forts. None of the Endicott Batteries that physically stand alone from any other structure are mentioned in enabling legislation and all were only contributing factors to the entire site's national significance. Therefore as a group, they received a lower priority for significance compared to the second and third system forts. The appropriate Level of Preservation Action recommended for these structures is "D - No Preservation Treatment (No Action)." Endicott batteries that are physically part of third system structures received a recommended Level of Preservation Action of "A - Preserve in Current State."

Since the enabling legislation of each park specifically mentions preservation of the masonry fortifications, for the purposes of this exercise, the work group did not use legislation in determining resource significance. If this process is used for evaluating other cultural resources, legislative mandates may be an important factor in determining resource significance.

The Guiding Principles for Historic Preservation worked well in setting preservation priorities and levels of action for masonry fortifications in the southeast. Determining the significance of a resource depends on the criteria used in its evaluation. The six elements used in this report could be modified or expanded to determine the relative significance of any type of cultural or natural resource.

The State Historic Preservation Officers (SHPO's) in South Carolina, Georgia, Florida and Mississippi were sent invitations to attend and participate in the prioritization process which took place on July 11 and 12 in Atlanta, Georgia. Personnel from three states, South Carolina, Georgia and Florida responded and indicated they would send representatives. However, no SHPO representatives attended the meeting.

In order to achieve impartiality and objectivity, it was valuable to have representatives on the work group that were knowledgeable of the resource and the preservation process but not directly responsible for the preservation of a site. This was achieved by having representatives from the Field Office, System Support Offices and other parks participate. Since priority setting is somewhat subjective, we felt it would be valuable to have knowledgeable individuals from outside the NPS participate in the future to insure neutrality.

Participants

John Breen, Chairperson	Fort Pulaski National Monument
Ann Childress	Fort Sumter National Monument
Jeff Parsons	Gulf Islands National Seashore
Chuck Dale	Castillo De San Marcos National Monument
Wayne Landrum	Dry Tortugas National Park
Kirk Cordell	Field Office, Southeast
Stuart Johnson	Systems Support Office, Atlantic Coast Cluster
Bob Blythe	Systems Support Office, Atlantic Coast Cluster
John Barrett	Systems Support Office, Gulf Coast Cluster
Rene Cote	Systems Support Office, Gulf Coast Cluster

APPENDIX D

Leasing Program Review and Recommendations, August, 1996

by

Hammer, Siler, George Associates
Larry Delay

INTRODUCTION

Budgetary pressures facing the Federal Government in general and the National Park Service (NPS) in particular has placed a new emphasis on generating revenues including revenues from NPS real property in balance with the NPS mission of preserving cultural and natural resources in the National Park System and providing public access to those resources.

The historic property leasing program authorized under Section 111 of the National Historic Preservation Act has been the NPS' primary vehicle for real property leasing outside of the substantial concessions program. While concessions provide essential support services to the public visiting the parks, the historic property leasing program is carefully circumscribed to NPS-owned historic properties which are not essential for park interpretation nor required for park operations, e.g., park administrative offices or park housing. Such properties include farmhouses acquired with the purchase of land in Civil War battlefields and former military buildings on closed bases turned over to the NPS.

The historic property leasing program leases properties to qualified developers for total rehabilitation and reuse for commercial purposes. The regulations for this program require that the leases be for as short a period as possible to compensate the lessee for his or her investment.

The program's primary goal is the rehabilitation and preservation of historic buildings. The NPS is facing an enormous backlog of deferred maintenance to historic buildings that are not essential to the park's interpretive program and visitor services. Typically, these buildings have received the minimum level of maintenance required to prevent deterioration, though sometimes not even that much maintenance. The program has the potential to rehabilitate many historic buildings which may otherwise face irreversible decay if restructured to remove some of the impediments to effective implementation. However, it was never conceived as a revenue generator, and it has limited potential to meet that goal.

In the 14 years since its implementation, the historic property leasing program has been used for only a few properties. The limited use of the program has several root causes, including:

- the nature of available historic properties;
- lack of real estate expertise at the parks and central offices;
- limited program support from the central offices;
- cumbersome program process and procedures; and
- limited financial resources to support the NPS' portions of the process.

This analysis evaluated the performance of the program to date with a particular focus on the process and procedures directing the leasing efforts in the individual parks. Our charge was to identify program shortcomings and then to bring "industry standard" techniques to the program.

This review and recommended reform of the historic property leasing program has relevance as well for leasing of other surplus NPS non-historic properties.

FRAMEWORK

The potential for leasing National Park Service historic properties is relatively limited by five key factors:

- Number of properties;
- Remote locations;
- Property condition;
- Property sizes and configurations; and
- Infrastructure inadequacies.

As shown in Attachment 1, the NPS' current inventory of vacant historic buildings, as of March 30, 1996, is relatively limited. A total of 17,436 structures are listed in the overall inventory, but only 607 are vacant buildings. A quick review reveals that many of these buildings are probably not leaseable because of the above-mentioned factors. Also, of the 607 vacant buildings, 117 or 19.3 percent are in good condition; 205 or 33.8 percent are in fair condition; 281 or 46.3 percent are in poor condition; and 4 or 0.6 percent are of unknown condition.

By the very nature of NPS holdings, many of the available buildings are in remote, rural locations, areas with limited market support for commercial development. The value of any commercial real estate development depends on the market potential for office rents, retail sales or other commercial ventures. While a building may be suitable for reuse as a retail establishment, no entrepreneur will open the store and no investor will invest in building rehabilitation if there are not enough potential customers to make the store profitable. Park visitors are often the only reliable market support; retail and services oriented to this market are required to be developed under concession contracts outside the leasing program. Remote locations rarely offer the level of market support required to justify an expensive building rehabilitation.

NPS use restrictions also impact the marketability of available properties. Given the parks' primary mission of preserving and interpreting cultural and natural resources, there is an understandable reluctance to allow commercial developments which might require parking, signage or another improvement that is incompatible with the historic or natural setting. The controls placed on property use by the parks' General Management Plans can significantly constrain the reuse potential.

Historic buildings are by definition old structures, some of which have been well maintained over the years. Others, however, have stood vacant for many years without any maintenance. Because these vacant buildings are not essential for park interpretation nor required for park operations, their maintenance has been given lower priority than the visitor facilities central to

the parks' missions. It does not take long for a vacant building to deteriorate -- holes in the roof, broken windows or simply lack of heating in the winter can rapidly damage a property and substantially increase the future cost of rehabilitation. The value of commercial real estate is determined by the value of the future stream of rental income less the cost of rehabilitating the building to make it suitable for commercial use. When the rehabilitation costs get too high, the building may have minimal or no value. There may be no way to justify private investment in building improvements if the cost exceeds the potential rental value.

Many of the historic structures are farmhouses and other small buildings designed as dwellings, barns or other uses appropriate to their time. Their size and configurations do not often conform with the needs of modern commercial enterprises. Some five- or six-room buildings may be well located for reuse as a Bed and Breakfast; however, a Bed and Breakfast typically requires 10 rooms or more for profitable operation.

A barn may offer a wonderful space well suited for adaptive reuse, yet the historic preservation standards would prohibit new wall penetrations and the insertion of windows.

It is not uncommon for farmhouses and other surplus historic buildings to be located some distance from power and telephone lines and public water and sewer systems. Again, the high cost of providing modern utilities may be prohibitive in the context of potential lease revenues.

Thus, while the need for lease revenues is very real, the potential for generating significant revenues from leasing of historic properties is quite limited. The program should be recognized for its primary benefits -- the preservation of historic buildings at little or no cost to the Federal Government.

Property Deterioration Threatens the Potential for Rehabilitation

Issue

Years of deferred maintenance have reduced the structural integrity and condition of historic buildings potentially suitable for leasing. In some cases, the deterioration has reached the point where rehabilitation costs substantially exceed the property's commercial value.

Recommendations

- NPS should place high priority on quick action to stabilize and lease excess historic buildings. A delay of even two to three years can make the difference between a financially viable rehabilitation and one that requires significant subsidy.

- Where immediate rehabilitation for long-term commercial use is not possible, special-use permits and other short-term agreements which keep these historic buildings occupied are preferable to letting the buildings sit empty. Occupancy discourages vandalism and assures that minor problems (e.g., leaky roofs) are quickly repaired before creating major problems.

- For historic buildings which have already experienced significant deterioration, private rehabilitation will not occur without NPS' financial participation. Where funding allows, the Hot Springs approach of NPS investment in basic exterior stabilization and rehabilitation is an effective approach to reducing the costs and risks of private investment to the point where investors will consider undertaking a lease and interior rehabilitation for commercial use.

Examples

- The long-term vacancies at Ellis Island and Fort Hancock have allowed substantial building deterioration to the point where the buildings may not be salvageable, at least not without considerable public investment.

  The recent transfer of Fort Wadsworth from the Department of Defense poses opportunities for near-term reuse and the threat of significant building decline if rehabilitation and reuse do not proceed quickly.

- The Presidio has short-term leased several buildings using special use permits. These arrangements provide valuable maintenance for buildings which might otherwise deteriorate before long-term leasing efforts are successful in securing total rehabilitation.

- Years of sitting vacant have substantially damaged the historic bathhouses along Bathhouse Row in Hot Springs. Despite repeated attempts to lease the buildings for private rehabilitation, the only promising proposals have come after investment of $3 million in exterior stabilization and rehabilitation, removal of lead-based paint, waterproofing, installation of electrical feeders and installation of ventilation systems to prevent further damage from the springs' high humidity.

Current Accounting Practices Do Not Reflect the Leasing Program's Benefits

Issue	*Recommendations*	*Examples*
The valuable and important preservation accomplishments of the historic property leasing program are not adequately reflected, recognized or rewarded. There is no accounting or reporting mechanism that quantifies and records the substantial public costs avoided by private commercial leases and rehabilitation.	• The NPS should develop an accounting process to quantify and track avoided costs. Each lease executed under the program should include a report which documents the private investment in the building and estimates the annual maintenance costs avoided by the private occupancy and maintenance.	• The adaptive reuse of the Bond House in Independence secured a privately financed $1 million rehabilitation of an important historic building, resolving significant structural problems. Without this private investment, the building might otherwise have been lost due to lack of NPS funding for structural repairs.

Real Estate Expertise Is Essential to Successful Leasing

Issue

Property leasing will not happen on its own. Park superintendents do not have the real estate expertise critical to finding a lessee and successfully negotiating a lease that protects the NPS's interests. Until park superintendents have help and guidance in the use of leasing, leasing will succeed only rarely.

Recommendations

- Any leasing program needs an advocate to work with individual park superintendents to identify properties with potential and to assist them in preparing those leasing opportunities for lessee solicitation.

- Real estate expertise should be provided to park superintendents in soliciting private investment, negotiating the initial lease, testing the financial implications of alternative lease clauses and enforcing the lease terms. That expertise could be provided through a service-wide coordinator or field coordinators or through a series of umbrella consulting contracts.

Examples

- Use of the historic property leasing program was greater in its initial years when there was a service-wide program coordinator working to encourage and assist park superintendents to consider leasing specific properties.

- Lowell used a real estate consultant in soliciting developer interest in Old City Hall, in conducting the developer competition and in negotiating the ultimate lease. The park personnel involved emphasized the importance of having access to such expertise.

- The Presidio leasing has been greatly assisted by the real estate expertise among the staff hired for that effort and the consulting team which helped to solicit developer proposals, to evaluate those proposals and to negotiate leases.

Several Historic Property Rehabilitations Will Require Public Funding

Issue

For many of the NPS's historic buildings, private rehabilitation will occur only with an infusion of public dollars. Low property values coupled with high rehabilitation costs prohibit private developers and investors from undertaking these projects. Without the potential for an adequate return on investment with an acceptable level of risk, the private developer and his investors and lender will seek other projects. The historic preservation tax credit was created to provide meaningful incentives for historic building rehabilitation; however, the Tax Reform Act of 1986 significantly reduced the tax credit amounts and their ease of use.

Recommendations

- Where possible, direct appropriation of preservation funds in concert with private investment would be most effective.
- The NPS should explore potential funding support from foundations which share the goals of preserving park historic structures.

Examples

- The Bond House and many of the other properties rehabilitated prior to the Tax Reform Act of 1986 relied heavily on the preservation tax credit.
- The Presidio lease of old hospital buildings to The Tides Foundation was made possible only by NPS funding of site improvements and participation in cost reduction on an annual basis. The NPS participation closed the gap between the cost of rehabilitation and the supportable private investment, making possible a $5.25 million high-quality rehabilitation of 73,200 square feet of historically significant buildings.
- At Hot Springs, leaking roofs, high interior humidity and lead-based paint had substantially increased the costs and risks of rehabilitating the historic bathhouses. The park used appropriated funds to stabilize and rehabilitate the exteriors of two bathhouses, to remove the lead-based paint and to install ventilation and heating equipment. That $3 million investment has made those bathhouses much more attractive to private investors; a developer competition is now underway for their development.

Funding is Needed for Services Before the Solicitation of Lessees

Issue	*Recommendations*	*Examples*
The rehabilitation of Federally-owned buildings is subject to several requirements not normally incurred by private real estate developers. These include the need for an archaeological survey which must be completed before a lease can be signed. Before a developer has control of a property, he is typically very cautious about investing money for such services. These requirements are appropriately funded by the park as part of the leasing process; however, there is no funding for these services. A park superintendent is forced to try to find monies from the park's operating budget. Without up-front funding of these pre-lease expenses, the park superintendent may not be able to pursue a leasing opportunity.	• A central NPS fund should be created to fund initial pre-lease analyses and services for individual parks pursuing leasing.	• The Piper Farm house lease at Antietam required a $16,000 archaeological survey before the land could be disturbed for extension of a water line. Finding the funds to cover that cost was a major problem for the park superintendent.

The Current Leasing Program is Slow, Cumbersome and Ineffective

Issue	*Recommendations*	*Examples*
The leasing process is slow and cumbersome. Of the leases reviewed for this analysis, most took two years from initial developer solicitation to execution of the lease. This is an unacceptable delay in private real estate dealings. Most private leases or sales would be consummated in two to six months. During any long delay, market conditions can change substantially, undercutting the project's feasibility. Most developers have limited time to spend searching out potential projects; when faced with a difficult and lengthy leasing process, they are likely to choose to pursue another opportunity. With less developer interest and participation, the potential for effective competition is constrained.	• The entire leasing process needs to be revamped to mirror more closely the practices of the private real estate industry. The guidelines need to be restructured to avoid some of the delays, and park superintendents need a better appreciation of the importance of timely action. This process would include execution of a letter of intent to lock in the business issues, payment of funds by the prospective tenant as an earnest money deposit, and speedy preparation and execution of the lease agreement. • The NPS must do its homework before soliciting developer proposals. This would include conducting the appraisal and archaeological survey, defining acceptable uses, performing an initial environmental review for any potential on-site contamination, determining whether the property will be subject to local real estate taxes and/or building codes, performing a title search, identifying and compiling all Federal regulations impacting the development, and determining the historic significance of the building and which features must be retained. • Whenever possible before soliciting a lessee, the NPS should prepare the historic building	• Waiting until a developer proposal was received and selected before initiating the property appraisal delayed the leasing of The Piper Farm house, the Bond House and the bathhouses at Hot Springs for two to three months. • The proposed lessee for the Quapaw Bathhouse at Hot Springs has complained vigorously about his inability to get NPS feedback and decisions in a timely fashion.

The Current Leasing Program is Slow, Cumbersome and Ineffective (continued)

Recommendations

analysis to specify what features would need to be retained for the project to qualify for the historic preservation tax credits and to identify any structural constraints.

- The NPS review and approval process must be simplified and accelerated. If the NPS lease processing time is to approach the speed of a private-market transaction, a two-month delay in getting a written opinion or other assistance from the Solicitor's Office is unacceptable. The Solicitor's Office and NPS officials must commit the necessary resources to provide timely review, advice and approvals.

- A model lease should be developed in coordination with the Solicitor's Office which can be quickly and easily adapted for individual projects. It may be appropriate to have two different leases, one suitable for highly complex properties and one for less complicated transactions. Standardizing most of the lease provisions would accelerate the Solicitor's Office review, simplify the park superintendent's lease negotiations, and avoid future lease problems resulting from failure to address key lease issues.

Recommendations (continued)

- The lease negotiation process and the ultimate lease should include schedule milestones committing both the developer and the NPS to timely decisions and actions.

Timely NPS Follow-Through is Critical to Leasing Success

Issue	*Recommendations*	*Examples*
Developers considering leasing NPS real property need to be able to count on the NPS to negotiate and move ahead expeditiously and in good faith. Withdrawing an RFP after proposers have invested substantial time and money is neither fair to those proposers nor healthy for a competitive process which depends on attracting several qualified proposals. Lack of timely follow-through dissuades developers and tenants from proposing in future competitions.	• Any NPS decision to lease property must be matched by a commitment to pursue the selection process and lease negotiation to the end as quickly as possible. • The project team approach should be adopted in leasing efforts to assure that the project has an advocate to help push it through the system. • The NPS must be committed to meeting its lease obligations in a timely fashion.	• The entire credibility of the Presidio leasing effort has been undermined by the starts and stops imposed by Congressional action proposing a new Presidio Trust and placing a moratorium on all lease transactions prior to the Trust's establishment. Organizations and developers who negotiated in good faith to lease property at the Presidio have been forced to delay their plans or go elsewhere. The Main Post and Housing Management RFPs were never acted upon. The Fort Mason Foundation, for example, estimates that it has invested approximately $100,000 to study the Presidio buildings for potential leasing and respond to RFPs.

Lease Terms Should be Adjusted to Reflect the Rehabilitation Costs

Issue

The risks of rehabilitating historic buildings makes such projects unattractive for many developers. Often, work can reveal major unexpected problems and higher costs. Requiring that a final lease be negotiated before the full cost of rehabilitation is known puts the private investor at extreme risk, reducing their interest in pursuing such projects.

Recommendations

- The NPS should consider negotiating lease terms defined by a formula related to actual documented costs. The NPS lease rate would be reduced or the lease term extended if actual costs significantly exceeded projected costs. In that way, the NPS would be sharing the risks with the private developer, making the private investment risk more acceptable and the developer more willing to participate.

- Where the proposed reuse is an unproven use without good comparables for appraisal purposes, the NPS should consider negotiating a percentage rent whereby the return to the NPS varies with the income to the lessee. In that way, the NPS would share in both the risks and rewards of property reuse.

Examples

- Rehabilitation of the Kennedy-Supplee Mansion was expected to cost $2.2 million but ended up costing more than $3 million. While the lease deal was economic based on the original anticipated cost, it became uneconomic when the costs escalated. As a result, the developer attempted to renegotiate lease terms several times and ultimately defaulted on the lease.

- The Bond House rehabilitation encountered a number of unexpected problems, including a major cost to upgrade a fire exit to a much higher standard than was expected. Total costs escalated 30 percent from the $650,000 budget to $950,000. If the ultimate cost had been known at the time of lease negotiations, the lease term would have been extended by several years to allow the developer to recoup his investment. This inequity could have been prevented by a lease agreement which set the term with a formula based on total documented costs rather than a specific number of years.

Lessees Need Compensation for Lease Cancellation

Issue	*Recommendations*	*Examples*
NPS leases include a clause allowing the Federal Government to terminate the lease for its convenience. No provision is made to compensate the lessee for any losses incurred as a result of that cancellation; the lessee must depend on the general right to sue for compensation. That course provides no guarantee that the lessee's investment will be recouped in a timely fashion, making it virtually impossible to attract private financing.	• Legislation should be enacted providing full lessee compensation in the event of a lease cancellation. This legislation should mirror the legislative protections given to concessionaires when concessions contracts are canceled for the convenience of the Government.	• The Bond House and Kennedy-Supplee Mansion rehabilitation projects could only be financed because the lessees provided personal guarantees to their lenders; that is not acceptable to most developers.

Attracting Qualified Developers Requires Aggressive Marketing

Issue

Attracting qualified developers for historic buildings is not a simple task given the restrictions upon use and the specialized nature of historic preservation. With only one developer interested in the project, it is hard to get competition in awarding the lease. Without competition, the park superintendent cannot be confident that the lease terms are consistent with the property's market value.

Recommendations

- In seeking developers for an historic building, the NPS should undertake an aggressive program of outreach marketing, including:
  - preparing a succinct and marketing-oriented description of the property and the leasing opportunity for widespread distribution (as opposed to the lengthier and more technical Request for Proposals); advertising in appropriate media (e.g., the local newspaper, Preservation News); listing in Commerce Business Daily; mounting information on the World Wide Web as was recently done for two bath houses at Hot Springs; contacting preservation architects through the American Institute of Architects; contacting local and regional developers, particularly those with preservation experience; issuing press releases to local and regional newspapers and magazines and interesting a reporter or editor to feature the building or the leasing program; and contacting local real estate brokers.

- A service-wide coordinator of the historic property leasing program could assist individual park superintendents by preparing a model Request for Proposals, which was more marketing oriented and yet included all the background information about the program and its procedures that a bidder would need to know before submitting a proposal.

- For some properties, particularly those in good condition, the park superintendent should consider hiring a real estate broker to market the property. If selected from a competition with other brokers, the broker could become the property's leasing agent compensated by commission when a lease is signed.

Examples

- The Bond House developer solicitation was very well executed, including direct mail contacts with all local and regional developers who had ever applied for a historic preservation tax credit. The Presidio has benefited from a sophisticated marketing outreach program.

- The offering of Antietam buildings (Sherrick House and Otto House) was limited to only three daily listings in the local newspaper and a notice in Commerce Business Daily. Only one proposal was received for the Sherrick House, and that proposal was not financeable.

Leases Must Be Managed After Execution

Issue

- Few of the executed leases are being effectively managed. Several of the negotiated leases include clauses for rent increases after a certain number of years, but no one at the park level has been tracking those scheduled increases to assure proper payment. Other lease provisions (e.g., escrow fund payments for future repairs, filings of annual insurance certificates, building improvements) were even less frequently tracked and enforced. An ironclad lease protecting the NPS interests is only as good as its ultimate enforcement.

- The parks are not

Recommendations

- The parks with leases should assign responsibility for tracking that lease(s) to a specific staff member. A lease abstract should be prepared along with a "tickler file" to alert NPS to upcoming events (e.g. rent increase dates). That tickler file could be coordinated with a service-wide program.

- At execution of the lease, a final memorandum should be placed in the property files memorializing the negotiations in terms of what the issues were and why certain lease provisions were negotiated. These can be quite valuable to future staff members.

- A NPS representative should regularly schedule routine walk-throughs of the property to assure lessee compliance with the required maintenance program.

- The model lease developed for future leasing efforts should specify time periods during which a default can be cured. It is typical to require payment of any back rent within 30 to 60 days to avoid lease default. Non-monetary violations of the lease typically need to be cured within 60 to 90 days.

Examples

- The Federal Emergency Management Agency lease for space at the Presidio obligated it to make improvements to the building. Those lease provisions were not enforced, and the improvements were never made.

- None of the lease files examined included annual certificates of insurance.

- Failure to clarify whether the NPS or the local health official was responsible for health inspections left the Kennedy-Supplee Mansion uninspected for several years, allowing several health and safety violations to persist.

- The Kennedy-Supplee Mansion lessee has had a history of late and insufficient payments. The park superintendent recently has initiated proceedings to declare the lessee in default of the lease, but the park would have been better served if the lessee had been replaced much sooner.

- Hot Springs historic bathhouses suffered significant deterioration in the three years between leasing to Melvyn Bell and his ultimate default and lease termination. A

Leases Must Be Managed After Execution (continued)

Issue	*Recommendations*	*Examples*
generally equipped to respond to a lessee default and seem to try to avoid confrontation. Letting a default drag out for several months is not typically wise. • The leases executed to date do not always clearly define default provisions and limit the time period during which the lessee can cure a breach of the lease.	• The park superintendents should move quickly to work out any lessee default. They should be given timely advice and assistance to respond to defaults that are not quickly cured. The Solicitor's Office needs to establish a policy of quick response and support for park superintendents facing a lease dispute. • In the event of a troubled lessee, the NPS should urge the lessee to seek a new owner or operator and should facilitate transfer of the lease.	more aggressive enforcement of lease terms could have avoided some of that deterioration.

Property Leases Must Include Lender Protections

Issue	*Recommendations*	*Examples*
The leases signed for some of the NPS historic properties do not include the lender protection provisions typically incorporated into leases financed by third parties. Without such provisions, traditional real estate lenders will not finance such developments.	• The model lease recommended above (see pg. 65) should incorporate standard lender protections, such as the "right to cure", which allows the lender a specific period of time in which to pay any back rent or remedy any other default which would cause the lessee to lose the lease. The lender should have the right to step in and act in the developer's stead in order to protect its collateral (the leasehold interest).	• The Kennedy-Supplee Mansion lease has no lender protections in the event of lessee default. Presumably, this was only acceptable to the lender because the loan was secured by the developer's interest in a successful industrial park development rather than his leasehold interest.

Loan Guarantees Would Increase the Likelihood of Private Financing

Issue

Private financing is difficult to secure for redevelopment of leased buildings. Rehabilitation is generally less predictable and therefore more risky than new construction. The unproven market buildings for some of these properties also is a problem in securing private financing. It is important to reduce the risks and uncertainties facing private lenders in these deals.

Recommendations

- Loan guarantees are an effective way to encourage greater participation by private lenders. Small Business Administration-guaranteed loans are available for some types of commercial establishments which might be established. The NPS should investigate the potential for establishing a relationship with the SBA to provide loan guarantees for businesses in NPS buildings.

- The National Historic Preservation Act authorizes the Secretary of the Interior to establish a loan guarantee program for preservation of historic properties on the National Register of Historic Places. The NPS should investigate mechanisms for creating such a program and its budgetary implications.

Examples

- The Piper Farm house Bed and Breakfast at Antietam was established with an SBA-guaranteed loan. The SBA guarantee allowed the developer/operator to get private financing for the rehabilitation and operations.

  The sole bidder for the Three Sisters historic military warehouses in Golden Gate was unable to finalize the deal and enter into a lease due to her inability to secure private financing.

NPS Naming and Signage Policies Deter Philanthropic Support

Issue	*Recommendations*	*Examples*
Several local and national foundations share the NPS's goals of preserving park historic buildings. Some could be attracted to develop and/or support rehabilitation of these buildings. However, the NPS has a limited ability to attract major donations due to its naming and signage policies.	• The NPS should pursue partnerships with foundations and other non-profit organizations and investigate opportunities for less restrictive naming and signage policies for buildings being rehabilitated.	• The General Management Plan (GMP) for the Presidio calls for a community of public and private organizations engaged in research, education and training consistent with the theme of "Swords into Plowshares". That theme could attract major support from foundations and individual donors, but no building can be named for its benefactor.

Additional Lease Clauses Are Needed to Protect NPS' Interests

Issue

The leases executed to date do not include all of the financial clauses required to fully protect the NPS' interest.

Recommendations

- The model lease should require the lessee to maintain insurance for the full replacement value of the building or at least the maximum insurable value, including the cost of the improvements. The NPS should have a sign-off on the insurance company's payment/ release of insurance proceeds to assure that the proceeds are spent on rehabilitating the building.
- During construction, surety bonds should be required to cover the entire cost of rehabilitation.
- Escrow accounts for future building maintenance are a useful tool in protecting the NPS' historic properties.

Examples

- The Piper Farm House lease does not contain adequate insurance provisions, initial and on-going rehabilitation requirements, nor annual maintenance requirements.
- The Bond House lease requires only $70,000 of hazard insurance in spite of the $950,000 cost of rehabilitation.

Parks Need Incentives to Take on Difficult Leasing Projects

Issue	*Recommendations*	*Examples*
Leasing of properties requires initiative and a commitment of park staff and funding. There is little incentive for a park superintendent to undertake that process if all of the potential lease revenues are returned to the Treasury or a central fund. Currently, lease revenues from the historic property leasing program are retained by the park to fund historic preservation efforts.	• Property leasing revenues, or at least a large proportion of those revenues, should be retained within the park to support historic preservation and other park programs.	• The lease revenues to Valley Forge from the Kennedy-Supplee Mansion lease have been a valuable resource used to fund the park's historical architect.

Private Residential Use Should Be Considered for Some Properties

Issue	*Recommendations*	*Examples*
Some of the historic properties in the NPS inventory are small farmhouses, which are not suitable for commercial use by virtue of their location, size and/or configuration. Housing may be their only viable use.	• Park superintendents with surplus historic houses should consider allowing their use for private residences with easements to assure consistency with the park setting (e.g., limited number of cars, no modern playground equipment).	• Antietam has five vacant farmhouses. Some, but not all, may have potential as Bed and Breakfast establishments if managed in tandem with other facilities. For those not suitable for a Bed and Breakfast, private residential use may be the only use which could justify building rehabilitation.

NPS Offices Do Not Require the Most Marketable Buildings

Issue	*Recommendations*	*Examples*
Some opportunities for generating significant lease revenues are missed because historic buildings with leasing potential are reserved for NPS use. In some cases, these buildings will require substantial NPS funding, funding which is unlikely to be appropriated.	• Future GMP's should include a section considering the leasing potentials of historic buildings not required for park interpretation. NPS use of historic buildings for administration and housing should be directed to those buildings with more limited potentials for private commercial leasing. Some buildings are more difficult to lease due to space configuration. Leasing of buildings with superior opportunities for successful commercial use could generate some of the funding required to rehabilitate other historic structures.	• The Merchants Exchange building in Independence is well located and configured for commercial office and retail use. Currently, the GMP calls for its use as park administrative offices, relocating park employees from the First Bank Building and other buildings. The Merchants Exchange will require an estimated $14 million in rehabilitation before it can accommodate park offices, $11.3 million of which has not been appropriated. The First Bank Building is much less suitable or attractive for commercial use due to its configuration with a major interior rotunda and less than optimal layout for office use. Continued NPS use of the First Bank Building with private commercial use of the Merchants Exchange Building could assure effective use and preservation of both buildings with a new source of revenues for the park. Requiring the GMP to address both leasing potentials and realistic funding levels could have helped to avoid this underutilization of park real property.

ATTACHMENT 1

VACANT HISTORIC BUILDINGS

Attached is a partial list of vacant historic buildings from 228 of the 369 parks derived from the NPS historic structures inventory as of March 30, 1996.

This list has not undergone any park management review to determine if leasing would be an appropriate management strategy.

The conditions levels noted are defined as:

GOOD The structure and significant features are intact, structurally sound, and performing their intended purpose. The structure and significant features need no repair or rehabilitation, but only routine or preventive maintenance.

FAIR The structure is in fair condition if either of the following condition is present:

a) There are early signs of wear, failure, or deterioration though the structure and its features are generally structurally sound and performing their intended purpose; or
b) There is failure of a significant feature of the structure.

POOR The structure is in poor condition if any of the following conditions is present:

a) The significant features are no longer performing their intended purpose; or
b) Significant features are missing; or
c) Deterioration or damage affects more than 25% of the structure; or
d) The structure or significant features show signs of imminent failure or breakdown.

UNKNOWN Not enough information is available to make an evaluation.

Structure Number	Structure Name	Condition

ALASKA FIELD AREA
Alaska Cluster

ANIAKCHAK NATIONAL MONUMENT & PRESERVE		
00	Alaska Packers Association Shed	Poor
BERING LAND BRIDGE NATIONAL PRESERVE		
BEN-071	Fairhaven Ditch Cabin 1	Poor
BEN-159	Fairhaven Ditch Cabin 3	Poor
BEN-160	Fairhaven Ditch Cabin 2	Poor
BEN-161	Lava Lake Officer Quarters	Poor
BEN-162	Lava Lake Mess Hall	Poor
KTZ-032	Goodhope River Reindeer Cabin 1	Poor
KTZ-032	Goodhope River Reindeer Cabin 2	Poor
DENALI NATIONAL PARK & PRESERVE		
00040	Kantishna Roadhouse	Good
00042	Quigley Cabin	Fair
DENA040	Parker Cabin	Good
DENA058	Jauhola's Glacier Creek Cabin	Good
DENA165	Jauhola's Moose Creek Cabin	Fair
DENA167	Fish Lake Cabin	Poor
MMK-016	Stampede Mine Mill Building	Poor
MMK-016A	Stampede Mine Messhall	Good
MMK-016C	Stampede Mine Bunkhouse	Fair
MMK-016G	Stampede Mine Power House/Shop	Poor
MMK-016H	Stampede Mine Warehouse	Poor
MMK-016J	Stampede Mine Pilgrim Cabin	Fair
MMK-029	Carlson Lake Cabin	Fair
MMK-040	Taylor Cabin	Poor
MMK-044	Caribou Creek Camp Cabin	Poor
MMK-046	Last Chance Creek Cabin	Fair

Structure Number	Structure Name	Condition
MMK-056	Glacier Creek Dragline Bunkhouse	Fair
MMK-061	Little Annie Mine Cabin	Fair
MMK-089	Quigley Ridge Cabin	Poor
MMK-091	Alpha Ridge Mine Cabin	Poor
MMK-115	Carlson's Birch Creek Cabin	Poor
MMK-116	Slippery Creek Mine Cabin	Fair
MMK-120	Crooked Creek Cabin	Poor
MMK-228	Colorado Creek Cabin #1	Poor
MMK-228A	Colorado Creek Cabin #2	Fair
TAL-063	Fourth of July Creek Cabin	Poor
GLACIER BAY NATIONAL PARK & PRESERVE		
CS-1	Harbeson Cabin	Fair
CS-3	Dundas Bay Cannery Building	Poor
CS-6A	Ibach Cabin, Reid Inlet	Poor
KATMAI NATIONAL PARK & PRESERVE		
00	Fure's American Creek Cabin	Fair
BR-	"Important Packer" Scotty's Cabin	Poor
KLONDIKE GOLD RUSH NATIONAL HISTORICAL PARK		
DY-242	Pullen Barn, Dyea	Poor
LAKE CLARK NATIONAL PARK & PRESERVE		
C-16	Igitna River/Kenibuna Lake Cabin	Poor
SITKA NATIONAL HISTORICAL PARK		
002	The Old School	Fair
105	Priests' Quarters	Poor
WRANGELL - ST ELIAS NATIONAL PARK & PRESERVE		
NAB-009	Bonanza City, Unfinished Cabin	Fair
NAB-045	Chavolda Creek, Sawmill Cabin	Poor
NAB-047	Canyon Creek, Cabin	Poor
NAB-117	Bonanza City, Brothel	Poor
NAB-118	Bonanza City, Cabin	Fair
NAB-120	Chisana, Lou's Barn and Corral	Fair

Structure Number	Structure Name	Condition
NAB-134	Gold Run Too, Cabin (Feature 1)	Poor
NAB-139	Poorman Creek, Cabin (Feature 5)	Poor
NAB-137	Gold Run Too, Bunkhouse (Feature 12)	Poor
NAB-145	Cold Run Below Claim, Cabin (Feature 2)	Poor
NAB-152	Chavolda Creek, Cabin (Feature 1)	Poor
NAB-162	Monte Cristo, Cabin	Fair
VAL-235	Coppertown, Residence	Poor
VAL-235	Coppertown, Powder House	Poor
WRST-151	Peavine Bar, Cook House (001)	Poor
WRST-151	Peavine Bar, Bunk House (007)	Poor
WRST-151	Peavine Bar, Bunk House (008)	Fair
WRST-151	Peavine Bar, Residence (009)	Fair
WRST-151	Peavine Bar, Bunkhouse	Poor
WRST-151	Peavine Bar, Bunkhouse	Poor
XMC-040	Hubert's Landing, Cabin	Good
XMC-051	Nikolai Creek, Cabin	Fair
XMC-059	Radar Gulch, Prospector's Cabin	Fair
XMC-070	Calamity Gulch, Cabin	Poor
XMC-089	Midas Gold Mine, Mill Building	Poor
XMC-089	Midas Gold Mine, Bunk House	Poor
XMC-089	Midas Gold Mine, Cook House	Poor
XMC-097	Maccoll Ridge, Hunting Blind	Fair
XMC-104	Lucky Girl Mill	Poor
XMC-117	Monahan Creek, Trail Cabin	Poor
XMC-118	Golconda Creek, Cabin	Poor
XMC-135	Monahan Creek, Trail Cabin #2	Fair
XMC-141	Radovan's Camp, Cook House (Feature A)	Poor
XMC-143	Big Bend Lake, Cabin	Fair
XMC-144	Calamity Gulch, Cook House/Cabin	Poor
XMC-149	Louise Lake, Cabin	Poor

Structure Number	Structure Name	Condition
XMC-152	Sheriff Mine, Bunkhouse	Poor
XMC-153	Sheriff Mine, Machine Shop	Poor
XMC-155	Bremner Mining Camp, Power House	Poor
XMC-156	Bremner Mining Camp, Mess Hall and Bunk House	Fair
XMC-157	Bremner Mining Camp, Manager's Office	Fair
XMC-158	Bremner Mining Camp, Storage Building	Poor
XMC-159	Bremner Mining Camp, Mechanic's/Blacksmith's Shop	Poor
XMC-160	Glacier Creek Airstrip, Shelter Cabin	Fair
XMC-162	Radovan's Camp, Cabin (Feature C)	Poor
XMC-163	May Creek, Knutson Cabin	Fair
XMC-164	Nizina River, Arc Cabin	Poor
XMC-166	Nizina River, Trapper Cabin	Fair
XMC-167	Camel Lake, Cabin	Poor
XMC-168	Three Mile Lake, Cabin	Fair
XMC-170	Fredericka Glacier, Shelter Cabin	Fair
XMC-171	Amphitheatre, Shelter Cabin	Poor
XMC-173	Peninsula, Cabin	Poor
XMC-176	Solo Mountain, Shelter Cabin	Fair

INTERMOUNTAIN FIELD AREA
Colorado Plateau Cluster

BRYCE CANYON NATIONAL PARK		
HS-150	Standard (Duplex) Cabin	Good
HS-154	Standard (Duplex) Cabin	Good
COLORADO NATIONAL MONUMENT		
B1	Caretaker's Residence	Good
GRAND CANYON NATIONAL PARK		
0	North Rim Fire Lookout Cabin	Poor

Structure Number	Structure Name	Condition
0935	North Rim Inn Exposed Frame Cabin #1	Poor
0936	North Rim Inn Exposed Frame Cabin #2	Poor
0937	North Rim Inn Exposed Frame Cabin #3	Poor
0938	North Rim Inn Exposed Frame Cabin #4	Poor
0939	North Rim Inn Exposed Frame Cabin #5	Poor
0940	North Rim Inn Exposed Frame Cabin #6	Poor
0941	North Rim Inn Exposed Frame Cabin #7	Poor
0942	North Rim Inn Exposed Frame Cabin #8	Poor
0943	North Rim Inn Exposed Frame Cabin #9	Poor
0944	North Rim Inn Exposed Frame Cabin #10	Poor
0945	North Rim Inn Exposed Frame Cabin #11	Poor
0946	North Rim Inn Exposed Frame Cabin #12	Poor
0947	North Rim Inn Exposed Frame Cabin #13	Poor
0948	North Rim Inn Exposed Frame Cabin #14	Poor
0949	North Rim Inn Exposed Frame Cabin #15	Poor
0950	North Rim Inn Exposed Frame Cabin #16	Poor
0951	North Rim Inn Exposed Frame Cabin #17	Poor
0952	North Rim Inn Exposed Frame Cabin #18	Poor
0953	North Rim Inn Exposed Frame Cabin #19	Poor
0954	North Rim Inn Exposed Frame Cabin #20	Poor
0955	North Rim Inn Exposed Frame Cabin #21	Poor
0956	North Rim Inn Exposed Frame Cabin #22	Poor
0957	North Rim Inn Exposed Frame Cabin #23	Poor
0958	North Rim Inn Exposed Frame Cabin #24	Poor
0959	North Rim Inn Exposed Frame Cabin #25	Poor
0960	North Rim Inn Exposed Frame Cabin #26	Poor
0961	North Rim Inn Exposed Frame Cabin #27	Poor
AZB16:49	Boucher Camp	Good
AZC13:04	Beamer's Cabin	Unknown
AZC13:82	Grandview Mine Cookhouse	Fair

Structure Number	Structure Name	Condition
DVB0114	Tusayan Museum	Good
HS-13	Greenland Lake Salt Cabin	Poor
HS-14	Cave House	Poor
PASTURE1	Pasture Wash Barn	Fair
SRB0082	Pasture Wash Ranger Station	Poor
PETRIFIED FOREST NATIONAL PARK		
76	Painted Desert Inn Residence No. 1	Fair
77	Painted Desert Inn Residence No. 2	Fair
U6400	Puerco Pump House	Good
PIPE SPRING NATIONAL MONUMENT		
HS-02	East Cabin	Fair
HS-03	West Cabin	Fair
WALNUT CANYON NATIONAL MONUMENT		
WACA-107	Old Headquarters	Fair
ZION NATIONAL PARK		
HS-0032	Grotto Residence	Poor

Rocky Mountain Cluster

BLACK CANYON OF THE GUNNISON NATL MONUMENT		
HS-34	CCC Bunkhouse	Poor
CURECANTI NATIONAL RECREATION AREA		
HS-X3	Enbom Sawmill (Large Cabin)	Poor
HS-X4	Enbom Sawmill (Small Cabin)	Poor
GLACIER NATIONAL PARK		
B0183	Many Glacier Bunkhouse - Many Galcier	Poor
B1382	Miller Residence - Miller Homestead	Fair
B1386	Log House - Miller Homestead	Poor
ROCKY MOUNTAIN NATIONAL PARK		
HS-0048	Employee Residence #48	Poor

Structure Number	Structure Name	Condition
HS-0720	Wm Allen White Studio	Poor
HS-0721	Wm Allen White Upper Sleeping Cabin	Poor
HS-0722	Wm Allen White Lower Sleeping Cabin	Poor
HS-1000	Office/Residence	Poor
HS-1001	Eagles Nest Cabin	Poor
HS-1002	Prospector - Cabin #2	Poor
HS-1003	Rustlers Roost - Cabin #3	Poor
HS-1004	Cheyenne Cabin #4	Poor
HS-1005	Twin Owls - Cabin #5	Poor
HS-1006	Arapahoe - Cabin #5	Poor
HS-1007	Osage & Columbine - Cabin 7 & 8	Poor
HS-1008	Beaver Cabin	Poor
HS-1009	Big Horn - Cabin #9	Poor
HS-1010	Cabin	Poor
HS-1012	Double Cabin	Poor
HS-1016	Barn	Poor

Southwest Cluster

BIG BEND NATIONAL PARK

BBH-0042	Terlingua Abaja #8	Poor
BBH-010A	Mariscal Mine Main Processing Plant	Good
BBH-010B	Mariscal Mine Ellis Processing Building	Fair
BBH-010C	Mariscal Mine Ellis Processing Building	Good
BBH-010D	Mariscal Mine Paymaster's Office	Good
BBH-010K	Mariscal Mine Vivianna Blacksmith Shop	Poor
BBH-010L	Mariscal Mine Viviana Mine Office	Fair
HHB-010M	Mariscal Mine Employee's Hut	Poor
BBH-010N	Mariscal Mine Company Store	Fair
BBH-010P	Mariscal Mine Employee's Hut	Poor

Structure Number	Structure Name	Condition
BBH-010W	Mariscal Mine Employee's Hut	Fair
BBH-013	Sublette Farm Farmhand's Casita	Poor
BBH-015	Sublette Farm Stone Farm House	Poor
BBH-016A	Wilson, Homer House	Good
BBH-016D	Wilson, Homer Bunk House	Fair
BBH-080	Hot Springs Cabins	Good
BBH-082	Hot Springs Store and Post Office	Good
BBH-200	Livingston, Charles House	Fair
BBH-322A	Solis House #1	Fair
BBH-322B	Solis House #2	Good
BBH-391	Pettit's Place (#1)	Fair
BBH-443	Daniels Farm House	Poor
BBH-603	Castolon Army Compound Officer's Quarters	Good
BBH-604	Castolon Army Compound Noncommiss'ned Offcr's Qtrs	Good
BBH-605	La Harmonia Company, Magdalena House	Good
BBH-607	La Harmonia Company, Alvino Residence	Fair
BBH-617	Old Castolon Cafe-Residence	Fair
BBH-618	Old Castolon Store	Fair
FORT DAVIS NATIONAL HISTORIC SITE		
HB-4	Lieutenant's Quarters	Good
HB-5	Captain's Quarters	Good
HB-6	Lieutenant's Quarters	Good
HB-8	Lieutenant's Quarters	Good
HB-9	Captain's Quarters	Good
HB-18	Officer's or NCO's Quarters	Fair
HB-46	Hospital	Good
HB-47	Temporary Hospital	Good
HB-50	Hospital Storehouse	Fair
HB-151	Officers' or NCOs' Quarters Kitchen	Good

Structure Number	Structure Name	Condition
GUADALUPE MOUNTAINS NATIONAL PARK		
B-243	Grisham-Hunter Line Cabin	Fair
B-281	Williams Ranch House	Fair
B-286	Cabin at Cox Tank	Fair
B-343	Pratt Residence Servant's Quarters	Fair
LYNDON B. JOHNSON NATIONAL HISTORICAL PARK		
HB-21	Junction School	Fair
HB-36	Military Aides' Trailer	Good
HB-35	Communications/Switchboard Building	Good
HB-44	Johnson Sr., Sam E. Farmhouse	Good
HB-45	Jordan, H.A. Barn and Working Pens	Fair
HB-99	Bryon, George T. House	Fair
HB-102	Moore House	Good
HB-103	Jones House	Good
HB-104.B	Walker Workshop	Good
ORGAN PIPE CACTUS NATIONAL MONUMENT		
HS01A	Bates Well Ranch Main House	Poor
HS01B	Bates Well Ranch Small Residence	Poor
HS01C	Bates Well Ranch Blacksmith Shop	Poor
HS01D	Bates Well Ranch Hay Barn	Fair
HS01E	Bates Well Ranch Bunkhouse	Fair
HS02A	Dos Lomitas Ranch Main Ranch House	Good
HS03A	Bonita Well Line Shack	Fair
HS04A	Gachado Line Camp Adobe House	Fair
PADRE ISLAND NATIONAL SEASHORE		
HS-3	Bunkhouse	Poor
HS-4	Kitchen	Poor
WHITE SANDS NATIONAL MONUMENT		
10	Lucero Ranch Linecamp	Fair

Structure Number	Structure Name	Condition

MIDWEST FIELD AREA

Great Lakes Cluster

DAYTON AVIATION HERITAGE NATL HISTORICAL PARK		
HS-02	Hoover Block	Fair
LINCOLN HOME NATIONAL HISTORIC SITE		
HS-09	Morse House	Poor
HS-15	Dubois House	Fair
HS-20	Arnold House	Fair

Great Plains Cluster

AGATE FOSSIL BEDS NATIONAL MONUMENT		
HS-1	Cook, Harold J., Homestead Cabin	Poor
BUFFALO NATIONAL RIVER		
1A	Whiteley School	Fair
1C	Edgmon, Doy Barn	Fair
2C	Edgmon, J.T. Store	Poor
3A	Fowler, Troy House	Fair
3C	Fowler, Troy Old House	Poor
4E	Edgmon, Marion Caretaker's House	Poor
7A	Casey, A.F. House	Fair
7D	Casey, A.F. Log Building	Fair
8B	Casey, Arvel and Elsie Store/Cafe	Fair
11A	Boxley Mill	Good
11C	Villines, Clyde and Nellie Fishing Cabin	Poor
11H	Villines, Clyde and Nellie Fishing Cabin	Fair
11J	Villines, Clyde and Nellie Fishing Cabin	Fair
11N	Villines, Clyde and Nellie Spring House	Fair

Structure Number	Structure Name	Condition
13A	Villines, Robert House	Fair
13B	Villines, Robert Barn	Fair
13D	Villines, Robert Second Farm House	Poor
16A	Duty, Lieu Old House	Fair
17A	Scroggins, Frank House	Poor
18B	Ramsey, Audie Spring House	Fair
19B	Villines, R. Hezekiah Old Store	Fair
25A	Villines, William Log Barn/House	Fair
26B	Arrington Creek Barn	Fair
26C	Arrington Creek Barn	Fair
26I	Arrington Creek House #2	Poor
28-102	Mahoney Cabin	Poor
44B	Boxley Valley House	Poor
48A	Guthrie, Pleas House	Poor
49A	Hurley, Marion House	Fair
62-HB22	Farmer, J.W. House	Poor
A1	Brown School	Poor
A8	Old Arnold House	Poor
B2-1	Morning Star Barn	Fair
B2-3	Rush Blacksmith Shop	Poor
B2-4	Hicks General Store	Poor
B2-53H	Taylor-Medley General Store	Poor
B2-54H	Storekeeper's House (#1)	Poor
B2-55H	Brantley House (#2)	Poor
B2-56H	Kastning House (#3)	Poor
B2-57H	Wash House (#4)	Poor
B2-58H	Bundy House (#5)	Poor
B3-09H	Collier Homestead House	Fair
B3-11H	Collier Homestead Barn	Fair
B3-14H	Luther Arnold House	Poor

Structure Number	Structure Name	Condition
B3-112H	Williams, Valentine and Mollie House	Poor
B4-54H	Parker-Hickman Board Barn	Fair
B4-55H	Parker-Hickman Log Barn	Fair
B4-56H	Parker-Hickman House	Fair
B4-60H	Henderson, Eva Barnes House	Fair
B4-63H	Farmer Cabin	Poor
B4-64H	Farmer Barn	Poor
B4-74H	Erbie Church	Good
B4-77H	Jones, Rulus House	Fair
B4-78H	Jones, Rulus Barn	Poor
B4-91H	Shaddox Cabin	Fair
B4-111H	Evans-White House	Poor
B4-A	Old Villines Place	Poor
B4-C	Old Villines Place/Hog Barn	Fair
BC	Cold Springs School	Fair
HB-00	Shake Roof Cabin	Poor
FORT LARNED NATIONAL HISTORIC SITE		
HS-9	Officers' Quarters	Poor
HOT SPRINGS NATIONAL PARK		
HB-101	Lamar Bathhouse	Fair
HB-103	Ozark Bathhouse	Fair
HB-104	Quapaw Bathhouse	Fair
HB-106	Maurice Bathhouse	Fair
HB-109.B	Boathouse	Poor
MOUNT RUSHMORE NATIONAL MEMORIAL		
HS-097	Hall of Records	Fair

Structure Number	Structure Name	Condition

NATIONAL CAPITAL FIELD AREA
National Capital Cluster

CHESAPEAKE & OHIO CANAL NATL HISTORICAL PARK

019.64A	Pennyfield House	Poor
022.80A	Lockhouse - Lock #24	Good
065.30	Knight Property - House	Poor
065.70	Staub Property - House	Fair
069.02A	Antietam Grocery	Poor
069.33B	Bussard, Daniel L, Property, Barn	Fair
069.50A	Adams, Rev. John A, Property, Area I, House	Fair
070.02A	Adams, Rev. John A, Property, Area II, Log Cabin	Poor
072.77D	Blackford, Franklin Property - Store	Fair
072.80A	Ferry House	Poor
088.00A	Anderson, Stanley L, Property, Stone Building	Fair
099.32A	Lockhouse - Lock #44	Good
103.47	Worker's House	Poor
106.83	Lockhouse - Guard Lock #5	Fair
106.92	Gallagher House	Poor
107.20A	Feidt/Ellis Property - House	Poor
107.20B	Feidt/Ellis Property - Barn	Fair
107.30	Feidt Property - House	Poor
107.44	Lockhouse - Locks #45 & #46	Fair
107.66	Leatherman Property - House	Poor
108.40	Four Locks School	Fair
108.73A	Prather Property - House	Fair
108.81	Flory, Alexander M., House	Fair
108.88	Lockkeeper's Shelter	Fair
131.40	Doyle Property - House	Fair
136.20	Lockhouse - Lock #56	Fair

Structure Number	Structure Name	Condition
136.21	Dunigan (Donegan), Property, House	Poor
156.16	Section House	Poor
GEORGE WASHINGTON MEMORIAL PARKWAY		
GE326AUD	Chautauqua Auditorium-Glen Echo Park	Fair
GE347A	Arcade-Glen Echo Park	Poor
GFPC-25	Dicky's Inn (Meyers Tavern)-Matildaville	Poor
GFPC-26	Superintendent's House-Matildaville	Poor
JP-1	Jones Point Lighthouse	Fair
HARPERS FERRY NATIONAL HISTORICAL PARK		
B12	Bldg. #12, Ann C Stephenson Building--Lower Town	Good
B38	Bldg. #38, Tearney Building--Lower Town	Good
MANASSAS NATIONAL BATTLEFIELD PARK		
BRWNFRM	Brawner Farn	Poor
HENHSE	Henry House	Poor
SUDLPO	Sudley Post Office	Poor
NATIONAL CAPITAL PARKS - CENTRAL		
33290004	Canal Lockhouse - Res. 332	Poor
NATIONAL CAPITAL PARKS - EAST		
10	NCO Quarters--Fort Washington	Poor
022	Mansion House-Marshall Hall	Poor
023-02	Engineers' Storehouse-Fort Foote	Poor
029-07	Sergant's House--Fort Washington	Poor
030-14	Torpedo Storehouse--Fort Washington	Poor
40	Commandant's House	Good
41	The Sergeant's House	Fair
PRINCE WILLIAM FOREST PARK		
3-32	Camp #3, Electric Shop/Toolhouse,	Poor
3-34	Camp #3, Paint Shop/Bath House	Poor
3-36	Camp #3, Stable & Tackroom	Poor
3-39	Camp #3, Education/Storage Building	Poor

Structure Number	Structure Name	Condition
ROCK CREEK PARK		
339-06	Pierce-Klingle Mansion (Linnean Hill)	Fair

NORTHEAST FIELD AREA
Allegheny Cluster

NEW RIVER GORGE NATIONAL RIVER		
N-001	Pugh House	Fair
N-002	Mankin-Cox Building	Fair
N-004	National Bank of Thurmond	Fair
N-006	Storage Building	Poor
N-007	Erskin Pugh House, Rental	Fair
N-019	Vento House	Poor
N-168	Philip Mcclung House, Tract 165-09	Fair
N-169	Philip Mcclung House-Rental, Tract 165-12	Fair
N-170	P. McClung House-Home Place, Rental, Tract 165-13	Fair
N-179	Tom Kelly House	Fair
N-181	Sid Childers/Margie Richmond House	Poor
N-182	"Fatty Lipcomb's" House	Fair
N-183	Marilyn Brown House	Fair
N-186	Sidney Ward House	Fair
N-190	Homer Nicely/Charles H. Ashley House	Fair
S-023	Trump-Lily Farmhouse	Poor
S-025	Trump-Lilly Main Barn	Fair
S-026	Trump-Lilly Sheep Barn	Fair
S-052	Prince Brothers General Store	Fair
S-158	Trump-Lilly Outlying Barn	Poor

Structure Number	Structure Name	Condition
Chesepeake Cluster		
APPOMATTOX COURT HOUSE NATL HISTORICAL PARK		
28	Sweeney Prizery	Poor
29	J. N. Williams Cabin	Poor
55	Sweeney Conner Cabin	Good
COLONIAL NATIONAL HISTORICAL PARK		
41Y216A1	Thomas Pate House	Fair
EISENHOWER NATIONAL HISTORIC SITE		
153	Clem Redding Farm, Redding Farmhouse	Good
GETTYSBURG NATIONAL MILITARY PARK		
074	Leister Barn	Good
150	Snyder Farm House	Fair
160	McClean Barn	Fair
234	Patterson Farm House	Poor
258	Wills Farm House	Good
304	J. Blocher House	Fair
339	Groft Barn	Fair
344	Groft Storage Building	Poor
350	J. Smith House	Fair
HOPEWELL FURNACE NATIONAL HISTORIC SITE		
023	Tenant House No. 3 Barn	Good
028	John Church Barn	Good
PETERSBURG NATIONAL BATTLEFIELD		
068	Hunter House	Fair
071	Bonaccord	Good
THOMAS STONE NATIONAL HISTORIC SITE		
04	Tenant House	Fair
VALLEY FORGE NATIONAL HISTORICAL PARK		
112	Maurice Stephens House	Fair

Structure Number	Structure Name	Condition
143	Walnut Hill Estate Mansion	Poor
143.B	Walnut Hill Estate Barn	Poor
612	Colonial Springs Bottling Plant	Unknown
612.A	Colonial Springs Tenant House/Warehouse	Fair
613	Fisher House/Slab Tavern	Poor

New England Cluster

ACADIA NATIONAL PARK		
BLDG046	Blacksmith Shop	Poor
BLDG158	Baker Island Light Station - Keeper's House	Fair
BLDG236	Carroll House	Good
BLDG298	Baker Island - Elisha Gilley House	Fair
ADAMS NATIONAL HISTORIC SITE		
HS08	Beale House	Fair
BOSTON NATIONAL HISTORICAL PARK		
028	Navy Yard - Building 28	Fair
058	Navy Yard - Building 58, Ropewalk	Poor
060	Navy Yard - Building 60, Tar House	Poor
105	Navy Yard - Building 105, Chain Forge	Poor
CAPE COD NATIONAL SEASHORE		
P-297	Leo Fleurant Cottage	Poor
T-17-23	Bog House	Poor
T-296	Watson-Schmid Cottage	Poor
T-300	Slade House	Fair
T-308	Jones Cottage	Fair
W-17-83	Dyer Barn	Poor
W-19-69	Samuel Rider House	Fair
W-25-56	Atwood-Higgins - Barn	Poor
W-315	Samuel Rider Storehouse	Fair

Structure Number	Structure Name	Condition
GATEWAY NATIONAL RECREATION AREA		
FW-103	Fort Wadsworth - Building 103 - Housing	Good
FW-113	Fort Wadsworth - Building 113 - Housing	Good
FW-115	Fort Wadsworth - Building 115 - Housing	Good
FW-119	Fort Wadsworth - Building 119 - Housing	Good
FW-138	Fort Wadsworth - Building 138 - Mars Station	Poor
FW-140	Fort Wadsworth - Building 140	Poor
FW-147	Fort Wadsworth - Building 147 - Torpedo Storage	Poor
FW-148	Fort Wadsworth - Building 148 - Warehouse	Poor
FW-302	Fort Wadsworth - Building 302 - Supply Warehouse	Good
FW-303	Fort Wadsworth - Buildings 303/304 - Motor Pool	Good
FW-305	Fort Wadsworth - Building 305 - Administration	Good
FW-309	Fort Wadsworth - Building 309 - Stable	Good
SH-002	Fort Hancock-Lieutenants' Quarters 02	Fair
SH-010	Fort Hancock-Captains' Quarters 10	Fair
SH-013	Fort Hancock-Captains' Quarters 13	Fair
SH-014	Fort Hancock-Captains' Quarters 14	Fair
SH-015	Fort Hancock-Captains' Quarters 15	Fair
SH-016	Fort Hancock-Lieutenants' Quarters 16	Fair
SH-017	Fort Hancock-Lieutenants' Quarters 17	Fair
SH-019	Fort Hancock-Hospital 19	Poor
SH-023	Fort Hancock-Barracks 23	Poor
SH-024	Fort Hancock-Barracks 24	Fair
SH-033	Fort Hancock-Bakery 33	Fair
SH-036	Fort Hancock-Post Stables 36	Poor
SH-045	Fort Hancock-Shell Warehouse 45	Good
SH-055	Fort Hancock-Mess Hall 55	Fair
SH-056	Fort Hancock-Mess Hall 56	Poor
SH-058	Fort Hancock-Mess Hall 58	Fair
SH-065	Fort Hancock-Storehouse 65	Fair

Structure Number	Structure Name	Condition
SH-067	Fort Hancock-Post Theater 67	Poor
SH-113	Sandy Hook Proving Ground-Laundry 113	Poor
SH-114	Sandy Hook Proving Ground-Brick Officers Qtrs. 114	Fair
SH-119	Fort Hancock-Barracks 119	Fair
SH-120	Fort Hancock-Barracks 120	Fair
SH-350	Fort Hancock-Generator Building 350	Poor
SH-402	Fort Hancock-Nike Radar Site-Barracks 402	Poor
SH-403	Fort Hancock-Nike Radar Site-Barracks 403	Poor
SH-410	Fort Hancock-Nike Radar Site-Generator House 410	Poor
SH-435	Fort Hancock-Nike Launch Site-Boiler House 435	Fair
SH-468	Fort Hancock-Nike Radar Site-HIPAR Building 468	Fair
MINUTE MAN NATIONAL HISTORICAL PARK		
4-103-A	Perry House	Fair
MORRISTOWN NATIONAL HISTORICAL PARK		
58	Cross Estate - Chalet - Barn	Fair
SAINT-GAUDENS NATIONAL HISTORIC SITE		
B04	Blow-Me-Down Mill	Fair
STATUE OF LIBERTY NATIONAL MONUMENT		
HS03	Baggage & Dormitory Building	Poor
HS17	Laundry Building	Poor
HS18	Psychopathic Ward	Poor
HS19	Hospital #1	Poor
HS20	Administration Building	Good
HS21	Hospital #2	Poor
HS24	Powerhouse	Poor
HS25	Animal House	Poor
HS26	Laboratory	Poor
HS28	Contagious Disease Wards 11/12	Poor
HS29	Contagious Disease Wards 13/14	Poor
HS30	Contagious Disease Wards 15/16	Poor

Structure Number	Structure Name	Condition
HS31	Contagious Disease Wards 17/18	Poor
HS32	Nurses' Quarters	Poor
HS33	Kitchen	Poor
HS34	Contagious Disease Wards 21/22	Poor
HS36	Contagious Disease Wards 23/24	Poor
HS37	Contagious Disease Wards 25/26	Poor
HS38	Isolation Wards 27/28	Poor
HS39	Isolation Wards 29/30	Poor
HS40	Isolation Wards 31/32	Poor
HS41	Staff House	Poor
HS53	Refrigerating Plant	Poor

PACIFIC WEST FIELD AREA
Columbia Cascades Cluster

MOUNT RAINIER NATIONAL PARK		
S-050	Huckleberry Creek Patrol Cabin	Poor
S-602	Sunrise Gas Station	Poor
NEZ PERCE NATIONAL HISTORICAL PARK		
HS-12	Fort Lapwai Officer's Quarters, Lapwai	Good
NORTH CASCADES NATIONAL PARK		
068	Brooder House, Buckner Ranch	Good
1024	Gilbert's Cabin	Poor
1157	Ruby Horse Barn	Poor
1217	Meadow Cabin, West	Fair
1218	Meadow Cabin, East	Poor
1223	Skagit Queen Mine Power Plant	Poor
SAN JUAN ISLAND NATIONAL HISTORICAL PARK		
101-01CF	Crook House	Fair

Structure Number	Structure Name	Condition

Pacific Great Basin Cluster

GOLDEN GATE NATIONAL RECREATION AREA

AL-064	Alcatraz Defensive Barracks	Poor
AL-079	Alcatraz Shops and Storage Building	Fair
AL-082	Alcatraz Model Industries Building	Fair
AL-089	Alcatraz Old Cell House	Fair
AP-0021	Aquatic Park Haslett Warehouse	Poor
FA-0909	Fort Barry Electrical Substation	Poor
FA-0960	Fort Barry Quartermaster Storehouse	Poor
FA-0961	Fort Barry Ordnance Storehouse	Poor
FA-0962	Fort Barry Artillery Engineering Storehouse	Poor
FA-1357	Fort Barry Searchlight #15 Powerhouse	Poor
FA-1376	Fort Barry Fire Control Station M1 Barry	Poor
FA-1382	Fort Barry Searchlight Shelter #10 (Point Bonita)	Poor
FA-1382A	Fort Barry Searchlight #10 Powerhouse (Pt Bonita)	Poor
FB-0272	Fort Baker Sentry Station	Poor
FB-0410	Fort Baker Mines Detonator Magazine	Unknown
FB-0411	Fort Baker Mine Depot TNT Storage Magazine	Unknown
FB-0433	Fort Baker Fire Control Station F1 Baker	Poor
FB-0434	Fort Baker Fire Control Station B1S1 Spencer	Poor
FB-0502	Fort Baker Transformer Sub-station	Poor
FB-0670	Fort Baker Mine Cable Tank Building	Fair
FC-1060	Fort Cronkhite Storehouse-Administration Bldg.	Poor
FC-1067	Fort Cronkhite Enlisted Men's Mess	Fair
FC-1068	Fort Cronkhite Storehouse-Administration Building	Fair
FC-1180	Fort Cronkhite Nike SF88C HIPAR Building	Poor
FC-1186	Fort Cronkhite Nike SF88C Ready Room	Poor
FC-1200D	Fort Cronkhite AA Battery #1 Quonset Shelter/Store	Fair
FF-0206	Fort Funston Nike Missile Warhead Building	Poor

Structure Number	Structure Name	Condition
OV-05.01	Randall Ranch Sarah Seaver Randall House	Fair
OV-15.05	Truttman Ranch Grade A Dairy Barn	Fair
OV-15.16	Truttman Ranch Bunk House	Fair
OV-15.20	Truttman Ranch Hay Barn	Poor
PE-0003	Main Post Temporary Barracks	Fair
PE-0037	Main Post Administration Building	Good
PE-0040	Main Post Bachelor Officers Quarters	Good
PE-0041	Main Post Bachelor Officers Quarters	Good
PE-0095	Main Post Powder Magazine	Fair
PE-0100	Main Post Enlisted Men's Barracks with Mess	Good
PE-0101	Main Post Enlisted Men's Barracks with Mess	Good
PE-0103	Main Post Enlisted Men's Barracks with Mess	Good
PE-0201	Main Post Exchange Store & Offices	Good
PE-0222	Main Post Warehouse	Good
PE-0223	Main Post Warehouse	Good
PE-0224	Main Post Flammable Storage	Poor
PE-0225	Main Post Storehouse	Good
PE-0227	Main Post Warehouse	Good
PE-0228	Main Post Bakery	Good
PE-0229	Main Post Bakery	Good
PE-0558	East Cantonment PX & Restaurant	Fair
PE-0650	Crissy Field Enlisted Barracks with Mess	Good
PE-0651	Crissy Field Administration Building	Good
PE-0654	Crissy Field Guard House	Good
PE-0920	Crissy Field Motor Repair Shop	Good
PE-0931	Crissy Field Armorer's Building	Good
PE-1008	Letterman Letterman Ward/76 Bed	Good
PE-1009	Letterman Letterman Ward/80 Bed	Good
PE-1012	Letterman Letterman Clinic	Good
PE-1013	Letterman Letterman Clinic	Good

Structure Number	Structure Name	Condition
PE-1014	Letterman Letterman Clinic	Good
PE-1016	Letterman Administration Bldg.	Fair
PE-1047	Letterman Laundry	Good
PE-1050	Letterman Ward, 80 Beds	Poor
PE-1051	Letterman Dentention Ward	Good
PE-1059	Letterman Combustibles Storage Bldg.	Good
PE-1060	Letterman Medical/Surgical Warehouse	Good
PE-1062	Letterman Quartermaster Shops	Good
PE-1065	Letterman Exchange Service Station	Poor
PE-1214	Fort Scott Artillery Band Barracks	Good
PE-1219	Fort Scott Quartermaster & Commissary	Good
PE-1220	Fort Scott Quartermaster's Office	Good
PE-1224	Fort Scott Dispensary/Infirmary	Good
PE-1225	Fort Scott Post Exchange Storehouse	Good
PE-1227	Fort Scott Quartermaster's Shop	Good
PE-1233	Fort Scott Storehouse	Good
PE-1237	Fort Scott Post Office	Good
PE-1239	Fort Scott Offices	Good
PE-1338	Fort Scott Inflammable Materials Storage	Good
PE-1339	Fort Scott Ordnance Repair Shop	Good
PE-1340	Fort Scott Ordnance Storage	Good
PE-1344	Fort Scott Command Fire Control Station	Poor
PE-1347	Fort Scott BOQ / Enlisted Men's Quarters	Fair
PE-1353	Fort Scott Searchlight Repair Shop	Good
PE-1355	Fort Scott Ordnance Repair Shop	Good
PE-1363	Fort Scott Ordnance Shop	Good
PE-1365	Fort Scott Machine Shop	Fair
PE-1387	Fort Scott War Department Theater	Fair
PE-1389	Fort Scott Post Chapel	Good
PE-1470	Fort Scott Central Magazine Building	Good

Structure Number	Structure Name	Condition
PE-1471	Fort Scott Central Magazine (Bermed)	Good
PE-1805	Marine Hospital Recreation Center	Good
PE-1806	Marine Hospital Senior Enlisted Qtrs.	Good
PE-1807	Marine Hospital Senior Enlisted Qtrs.	Poor
PE-1808	Marine Hospital Nurses Quarters	Fair
PE-1818	Marine Hospital Laboratories	Fair
PE-1819	Marine Hospital Laboratories	Good
TB-3503	Hamlet Lacey Cabin	Poor
TB-3505	Hamlet Bean Cabin	Poor
TB-3510	Hamlet Jensen House	Poor
TB-3511	Hamlet South Fisherman's Cabin	Poor
TB-3513	Hamlet Middle Fisherman's Cabin	Poor
TB-3515	Hamlet North Fisherman's Cabin	Poor
GREAT BASIN NATIONAL PARK		
JLAKE1	Johnson Lake Mine Cabin 1	Good
JLAKE5	Johnson Lake Mine Mill Building	Fair
JLAKE6	Johnson Lake Mine Stable Building	Good
TILFORDA	Tilford Spring Cabin	Fair
YOUNG	Young Canyon Stone House	Fair
WHISKEYTOWN NATIONAL RECREATION AREA		
LCS07410	Camden House Servants' Quarters	Good
LCS07412	Camden House Guest Quarters	Good

Pacific Island Cluster

KALAUPAPA NATIONAL HISTORICAL PARK		
1-10ABV	Bay View Home Building 10-A	Poor
1-118	Goodhue Street Residence 118	Poor
1-278BV	Visitors' Pavillion	Good

Structure Number	Structure Name	Condition

SOUTHEAST FIELD AREA

Appalachian Cluster

ANDREW JOHNSON NATIONAL HISTORIC SITE		
HS-4-04	Cemetery Lodge	Good

Atlantic Cluster

CUMBERLAND ISLAND NATIONAL SEASHORE		
009	Supervisor's Duplex	Poor
080	Stafford Mansion	Fair
089	First African Baptist Church	Fair
091	Alberty, Beulah, House	Fair
093	Bachlott-Peeples-Merrow House (St. Mary's)	Fair
FORT PULASKI NATIONAL MONUMENT		
HS-04	Cockspur Island Lighthouse	Fair
MARTIN LUTHER KING JR. NATIONAL HISTORIC SITE		
A488	488 Auburn Avenue, NE (Duplex)	Good
A506	506 Auburn Avenue, NE (Apartment)	Poor
A510	510 Auburn Avenue, NE (House)	Fair
A518	518 Auburn Avenue, NE (House)	Fair
A535	535 Auburn Avenue, NE (House)	Good
B37-39	Fire Station Number Six	Fair
OW483-85	483-485 Old Wheat Street, NE (Duplex)	Poor
OW487-89	487-489 Old Wheat Street, NE (Duplex)	Poor

Structure Number	Structure Name	Condition
Gulf Coast Cluster		
SHILOH NATIONAL MILITARY PARK		
D013	Superintendent's Residence	Poor
VICKSBURG NATIONAL MILITARY PARK		
HS-001	Shirley, James, House	Fair

APPENDIX E

Priorities Work Group Participants, April 26-27, 1995

WORK GROUP ON PRIORITIES FOR HISTORIC STRUCTURES
April 26-27, 1995

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APPENDIX F

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