

Preserve America, EO 13287 Section 3 Report

Department of Veterans Affairs

INTRODUCTION –

Executive Order 13287, “Preserve America” (2003) directs Federal agencies to include historic preservation in their day-to-day planning and management, and to report periodically on their progress. This report of the U.S. Department of Veterans Affairs (VA), Office of Construction and Facilities Management, updates reports initially issued in 2005 and most recently in 2011.

VA was created (as the Veterans Administration) in 1930, combining several more specialized pre-existing government programs. It manages 153 medical centers and related facilities, 133 National Cemeteries, and a number of other facilities such as leased community based clinics and substance abuse center; it also provides assistance to states, local governments, and Indian tribes in providing services to veterans and their families. VA is responsible for a broad array of historic places – districts, sites, buildings, structures, and objects – as well as other kinds of heritage assets (collections, documents, etc.) – in a range of conditions. Many of these have been identified, documented, and sometimes included in the National Register of Historic Places (NRHP); 17 are National Historic Landmarks (NHLs). Many more have not yet been fully evaluated, or even identified; identification, inventory, and documentation work is ongoing.

VA has had a historic preservation program since the 1960s, primarily focused on ensuring compliance with Section 106 of the National Historic Preservation Act (NHPA) in connection with VA construction projects, and on nominating selected properties to the NRHP. In recent years VA’s Federal Preservation Office (fPO) has undertaken a range of systemic program improvements designed both to broaden VA’s consideration of cultural resources and to integrate such consideration more effectively into agency planning and operations.

PART ONE – DEPARTMENT OF VETERAN AFFAIRS:

**OFFICE OF LOGISTIC, AQUITION AND
CONSTRUCTION**

OFFICE OF ASSET ENTERPRIZE MANAGEMENT

VETERANS HEALTH ADMINISTRATION

I. IDENTIFICATION

Explain how many historic properties have been identified and evaluated by your agency in the past three years? Has your inventory improved? Discuss policies to identify and promote historic properties and agency goals to identify future properties, as well as any internal reporting requirements.

VA-Wide (CFM)

VA has a vast inventory of real property. According to the Capital Asset Inventory, the Department's real property database, the inventory is classified as follows:

VA Building* Evaluation Status:

Evaluated	In Process	Not Yet Evaluated	Total
3228	1957	794	5979

*only buildings, does not include structures, corridors, etc.

Of those buildings evaluated using National Register of Historic Places (NR) criteria 2162 have been determined historic.

In a continuing effort to maintain the evaluation process, the Office of Acquisition, Logistics, and Construction houses FPO. The FPO currently is undertaking two multi-year NR context studies of approximately 90 medical centers. The first study looked at the "second generation" hospitals – those built between the World Wars. This study resulted in a multiple property submission (MPS) cover and 41 new individual National Register nominations which have been formally entered in the Register. The second study is looking at the "third generation" hospitals – those built between 1945 and 1960. The third generation MPS is in draft and 20 additional individual nominations have been drafted and are under review. In addition, 18 medical centers were determined to be not eligible for the NR. The third generation individual evaluations will continue in 2015 reviewing another 10 medical centers.

When looking at the broader category of historic properties, which goes beyond just buildings, the total number of identified historic properties in VA inventory: 4122 – which includes: contributing features to 157 historic districts (HDs), 131 National Cemeteries*, and 17 National Historic Landmarks.

Total number historic properties identified FY12-14: 45 HDs, with 1119 contributing buildings

FY	Historic Districts	National Historic Landmarks	National Register Listed	National Register Eligible
FY 12 **	25 HDs	0 NHLs	23 listed	2 elig
FY 13	18 HDs	2 NHLs	13 listed	3 elig
FY 14	2 HDs	0 NHLs	2 listed	0 elig

*all National Cemeteries are eligible

**2nd generation hospital

See appendix A for a full list of NR listed properties in the reporting year.

FPO continues to contract for Historic American Building Survey (HABS) photo-documentation of the most historic medical centers. In the reporting year, FPO had HABS measured drawings done for selected buildings at Milwaukee, WI, and Mountain Home (Johnson City), TN – both branches of the National Home for the Disabled Volunteer Soldier. In addition, HABS work was done at Jefferson Barracks, MO.



Figure 1 - Mountain Home historic chapel

Preservation plans were completed for Perry Point, MD and Biloxi, MS. Plans also are underway at Walla Walla, WA; Tomah, WI; and Roseburg, OR.

OAEM

The Office of Asset Enterprise Management is involved in identification when dealing with Enhanced Use Leases (EULs) when additional identification may be needed. See Re-use section for discussion of new EULs in historic buildings.

VHA

VHA is undertaking innovative VISN-wide surveys in several states in an effort to develop state-wide programmatic agreements to streamline section 106 compliance. Survey work has been completed in Ohio and Florida and is about to start in Massachusetts.

NCA

See section 2 for NCA's program specific report.

II. PROTECTION

Explain how your agency has protected, stabilized, and maintained historic properties. How has the agency used sections 106, 110 and 111 to protect properties? What training is available to agency staff and how have partnerships been used to protect properties.

VA-wide (CFM)

FPO continues to provide guidance, advice, and assistance to medical centers and cemeteries on the protection of historic properties. This usually done on a case-by-case basis but it also is incorporated into formal training offered by FPO. FPO interprets and reiterates federal law and regulations into VA's historic preservation protection policies.

OAEM

OAEM is involved in protection of historic properties as it relates to preservation of historic buildings under the EUL program.

VHA

VHA has several successful efforts to protect historic properties that were previously slated for demolition. Batavia, NY; Ashville, NC; Marion, IL; and Fayetteville, NC medical centers all made efforts to redesign projects to incorporate preservation of historic buildings.

While Preserve America emphasizes protecting historic properties by incorporating heritage tourism or economic development, tourism on medical center campuses is not appropriate in many cases although some campuses do have walking and motor tours.

Continuing efforts to develop useable historic preservation plans at medical centers aid in protection.

In addition, Perry Point VAMC is undertaking extensive renovation of the two oldest buildings in the VA's inventory, the 18c grist mill and mansion. Considerable funding has been committed to the accurate restoration and accessibility of the buildings with the intent of active re-use.



Figure 2 Perry Point Grist Mill, c. 17351

FPO requested input from the 21 VHA Veterans Integrated Service Networks (VISN) Capital Asset Managers which are the Administration's regional office experts. Following are the responses.

VISN 2 - Awareness training has been provided to Project Section Staff and Maintenance and Repair Section Supervisors about requirements of Section 106 NHPA. Whenever work is planned in buildings listed on the Historic Register, an informal review of the scope of work is conducted to verify that the work is not subject to the requirements of Section 106. Work that is subject to Section 106, whether it is M&R or a large scale renovations, is documented and sent to the regional Historic Preservation Office (New York State, Parks, Recreation and Historic Preservation) for prior review and approval.

Partnerships within the VISN are limited to good working relationships with the New York State Parks, Recreation and Historic Preservation Office as well as the FPO. The Medical Center Engineering Department is funded by appropriations from the Congress,

and as such, has no authority to partner with outside agencies towards the development of historic properties not located on Medical Center property.

VISN 5 - The VA Maryland Health Care System (VAMHCS) has two facilities with historic properties, either deemed eligible for listing in the NR or in the process of eligibility determination - Fort Howard and Perry Point. The other two main facilities in the VAMHCS, Baltimore VAMC and Loch Raven, do not have buildings that meet the eligibility criteria.

At Perry Point, in the last three years, the following construction projects were reviewed in conjunction with the State Historic Preservation Officer (SHPO) - Maryland Historic Trust (MHT) in accordance with Section 106 of NHPA: Alternate Truck Entrance; Renovate Mansion House and Grist Mill; Bldg. 22H Renovate for Substance Abuse Residential Rehabilitation Treatment Program; and 80H Expand Operation Iraqi Freedom/Operation Enduring Freedom and Renovate Bldg. 80H for outpatient Mental Health.

At Perry Point, a Historic Preservation Plan (HPP) was finalized in October 2013. The HPP captured the findings of the 1989 Phase I and Phase II Archeological Investigation at the Perry Point VAMC as well as the determinations of eligibility for various sections of the campus, one of which deems the entire Perry Point campus Eligible for Listing in the NRHP.

Perry Point has two current partnerships with other Government agencies leasing (historic) buildings: Department of Health and Human Services and National Civilian Community Corps (NCCC). Both of these agreements have these agencies occupying what would otherwise be vacant buildings. There is no direct "historic" benefit to the VA except that these government agencies needed space for their operation, and the VA had that space available. Perry Point has been fairly successful with the two agencies listed above although NCCC is vacating the Perry Point campus, as early as this autumn – to relocate into another historic property off site that better suits their needs.

Perry Point however will have challenges backfilling these spaces, as the facility needs to compete with another Government installation across the river (Aberdeen Proving Ground) that has an abundance of vacant buildings for lease, closer to metro Baltimore and other amenities.

VISN 7 - The Charlie Norwood VAMC (CNVAMC) in Augusta, GA has five (5) buildings on its Uptown campus that are historically significant. The building numbers of these structures are 7, 18, 19, 20 and 76. All five buildings have been vacant since 1991 when their functions were relocated to the new Bldg. 110 Medical Center. The water, natural gas and steam services to each of the five buildings have been turned off to prevent potential leaks within the unoccupied structures.

The CNVAMC has an active EUL for Buildings 7 and 76. These buildings will be renovated to accommodate homeless veterans through the Freedom's Path program. The building exteriors will not be modified. Building 18 is being considered a candidate

for an EUL to provide a Veteran assisted living facility. The EUL program is effective to provide surplus VA space to other agencies to continue the support of Veteran needs.

Dorn Medical Center in Columbia, SC has several buildings that are on the historical register which are still used and maintained as any other building to maintain a useful structure. All substantial renovations and repairs are coordinated through the state historical society to insure that the character of the buildings is not lost.

Dorn Medical Center has entered into long-term leases with two primary partners – The University of South Carolina and the Keenan Development. USC's lease primarily encompasses the original VA campus from 1932 and their maintenance staff abides by the state historical society when addressing renovations and repairs. Keenan Development has currently "mothballed" several structures while it works out the legal nuances to properly renovate the structures to be commercially viable.

In FY 2012, the VA's FPO contracted with a firm to visit and evaluate various VA Medical Centers as part of VA's Third Generation Veterans Hospitals study. In Georgia, the VAMC Dublin was one of these hospitals. The site visit portion of the study for Dublin was conducted during the week of April 15, 2013. The draft report recommended that VAMC Dublin be nominated for inclusion on the National Register of Historic Places. The draft NR nomination is presently in review. VAMC Dublin is being considered for inclusion on the register under three categories: 1) Criterion C: Architecture, for its Colonial Revival style of architecture, 2) Criterion A, as part of the Third Generation historic context at the state level, and as a representative example of a transitional hospital and 3) Criterion A; Health/Medicine as one of only two Navy facilities dedicated to the study of rheumatic fever during World War II.

VAMC Dublin has been careful to design new additions and renovations to the exterior of its buildings to reflect the original Colonial Revival style of the original campus construction. VAMC Dublin has not employed the use of partnerships to assist in the protection of historic properties.

VISN 8 – In Florida, the Bay Pines VA campus is on the NR and routinely collaborates with the Florida State Historic Preservation Office (FSHPO) on projects that may impact identified historic buildings.



Bay Pines VAMC 1

VISN 8 is currently working with CFM's FPO (003C2) in the establishment of a PA between VISN 8 and the FSHPO. FPO awarded a consultant contract that completed an assessment of each of the seven primary hospital sites to determine historic and archeological significance. The assessment has been completed and we are drafting the PA signed in place by the end of 2014.

While there are no legal restrictions from using partnerships, VISN 8 does not have any vacant space. All historic buildings are being maintained and utilized for VA mission services, both clinically and administratively.

Partnership has been between the Bay Pines VA and the FSHPO on a consultative basis but has been very successful. In addition, Veterans Benefit Administration (VBA) has a regional building located on the Bay Pines campus, but is not a historic building. All historic buildings on the Bay Pines campus are being utilized by the medical center.

The Bay Pines VA has a good track record in maintaining its historic buildings through the funding of Non-Recurring Maintenance projects that focus on keeping the buildings in good condition relative to their age.

VISN 10 - The Dayton, Ohio VAMC has completed a project in the last 3 years to restore and open our historic Protestant Chapel, which is one of the oldest church constructed by the government on United States Property (original construction was completed in 1868). Additionally, the VAMC completed restoration of the historic Grotto area to the way it looked in the early 1900s. The VAMC currently is working on a project to stabilize our Catholic Chapel, and our Building 401, by replacing roofs, improving structural deficiencies, and replacing leaking windows. Lastly, Dayton VAMC currently is designing some infrastructure improvements to our old Headquarters building, which is currently vacant, for the purpose of pursuing complete restoration of the building in the future.

The Dayton VAMC works with the local American Veterans Heritage Center (AVHC), who are utilizing our historic Putnam Library building. During Memorial Day weekend, the AVHC hosts an event on the VAMC campus for the public.

From 2006 to 2008, in Ohio, the Chillicothe VAMC worked with a nationally recognized consultant to develop a Master Plan for the facility. Extensive and significant deficiencies were identified with how the historic facility infrastructure was being utilized to provide modern healthcare. Multiple options were considered for improving healthcare delivery, including serious consideration for complete demolition of the historic buildings in favor of a new high-rise style hospital.

After full consideration of numerous options, and in deference to the intrinsic value in the historic structures, the Chillicothe VAMC Facility Master Plan was created based on a strategy that would preserve the vast majority of the historic structures. This would be accomplished through internal renovations, the construction of additions using similar style, materials and massing where appropriate, and limited demolition as necessary and/or appropriate based on site needs and/or structure conditions.

Since 2008 the Chillicothe VAMC has made significant improvements to the physical environment for the delivery of healthcare services for Veterans in several of the existing historic buildings including (but not limited to) all 6 buildings on the “big circle “ (B24, B26, B27, B30, B210 and B211) as well as our main hospital clinic structure, B31.

Minor renovations to the Mace House (conference center and museum) included restoring the exterior paint to its original color

In November 2011 several staff members including key leaders from the Chillicothe VAMC participated in historic preservation training hosted in Columbus, Ohio by VISN 10 in partnership with the Ohio Historic Preservation Office. This multi-day training event focused on identifying potential impacts to historic properties due to planned projects and how to properly engage in consultation with potentially interested parties (like OHPO) as required under Section 106 regulations.

Following this training in early 2012 the Chillicothe VAMC, with the assistance of nationally recognized preservation consultants, formally initiated Section 106 consultation for the entire Facility Master Plan. This consultation involved numerous participants including OHPO, the National Park Service, the ACHP, as well as local entities including various VSOs and a local group focused on the history of Camp Sherman. These consultation efforts included several meetings with the consulting parties to explain in detail the breadth and scope of the undertaking, to identify specific negative impacts including the targeted demolition of certain structures, and to solicit suggestions or requests for possible measures that could be implemented as mitigation.

The result of these efforts was the development of a Memorandum of Agreement that described the scope of the proposed work (Master Plan), defined specific limitations and protections for certain areas deemed to be of the highest historic value, and enumerated multiple mitigation measures to be undertaken. Although signed by a few of the participating parties including the National Parks Service, both OHPO and ACHP have refused to conclude the consultation by signing the MOA. VA is currently evaluating how to proceed.

The Chillicothe VAMC has been able to partner with local entities such as Alvis House and various small nursing colleges to put some of the historic buildings, which are not situated conveniently for continued use in providing healthcare, to some beneficial use.

These efforts have had only limited success. The structures require substantial upgrades and renovations which VA regulatory and contractual limitations do not allow. Without these expensive upgrades, these buildings continually become less and less attractive to potential tenants. In the past year, the Nursing Schools moved out and the Alvis House intends to move out in FY 2014.

VISN 15—Leavenworth, KS has an EUL with a developer who maintains both the renovated and non-renovated historic buildings. The non-renovated buildings are minimally maintained so that they remain structurally intact.



Figure 3 - Aerial view of the historic Leavenworth VAMC1

The partnership type relationship the VAMC has is with the EUL developer. The developer advertises the historic properties to the general public for varied mission compatible uses. This partnership had helped renovate buildings without use of any VA capital funds and the renovated buildings are for use by the Veteran.

VAMC Marion , IL follows the CFR 36 Section 106 process on projects/undertaking during project development to obtain concurrence from the Illinois Historic Preservation Agency (IHPA) and the ACHP prior to final design and construction. All the historic buildings have been identified and any proposed work adjacent, in the proximity, or to the buildings go through a review process in determining the adverse effects and determining mitigation measures to protect the buildings.

In addition to the above, Marion educates and encourages the medical center staff to be aware of the historic features and to contribute to its protection.

VISN 21 – In California, the VA Palo Alto Health Care System (VAPAHCS) has and continues to evaluate the eligibility of the historic resources (both build environment and archaeological) at properties within its jurisdiction.

VAPAHCS has developed an Environmental Planning Program that ensures early consideration of historic resources in its project planning process. The intent is to avoid effects when feasible.

In addition, the medical center is developing a cultural resource management plan to provide guidance for the preservation and management of historic resources located within its Menlo Park Division National Register Eligible Personnel Quarters Historic District. The intent is to preserve the integrity and to manage the property to maintain its historic character and to ensure that any future actions are sympathetic to the historic significance of the property.



Figure 4 - Palo Alto VAMC1

VAPAHCS utilizes archaeological monitors at construction sites and has established protocols to stop ground disturbing activities in the event that unknown historic resources are discovered in archaeologically sensitive areas.

VAPAHCS is currently completing reuse feasibility studies of National Register eligible buildings located on its Menlo Park Division campus. The intent is to reuse the buildings if feasible.

San Francisco VA Medical Center (SFVAMC) is currently consulting on a Section 106 Programmatic Agreement which will mitigate any adverse effects to the Fort Miley Medical Center's Historic District from construction development in the Long Range Development Plan. The mitigation measures in the PA include a Historic Preservation Maintenance & Treatment Plan. The historic properties at SFVAMC need to be seismically corrected to meet current safety requirements

VISN 22 - The VA Greater Los Angeles Healthcare System (GLAHS) has and continues to evaluate the eligibility of the historic resources (both build environment and archaeological) on all eligible sites and in compliance with NHPA & NEPA standards.

GLAHS is currently in process of updating NR eligible buildings located on its West Los Angeles campus.

In addition, the medical center has protected historic properties as allowed per budgetary constraints. GLAHS has multiple projects to renovate and structurally retrofit existing historic including an ongoing 12-Building Seismic Retrofit project.

GLAHS continues to consult on archeological and cultural resources on campus and utilizes professional consultation services for all construction projects and sites when necessary.

GLAHS has significant land use and sharing agreement restrictions on the West Los Angeles campus and is currently engaged in ongoing litigation regarding multiple past agreements. Congressional pressure to develop GLAHS buildings for EUL has been ongoing; however land-use restrictions for both the West Los Angeles and Sepulveda Campus' exist:

- Cranston Act - Public Law 100-322, section 421(b) (2), as amended limits the transfer of approximately 109 acres (29% of WLA property) to other government agencies and prohibits those acres to be declared as "excess to the needs of the Veterans Administration." Congressional approval is necessary for any future disposition of this land.
- Cranston Act (cont.) -Public Law 110-161, section 224 (a) & (c) of the Consolidated Appropriations Act, 2008, extends the reach of the Cranston Act and bans commercial development on the entire campus and/or further disposition of any land.

NCA

See section 2 for NCA's program specific report.

III. Re-Use

Explain how your agency has used historic properties and the total number of your agency's historic properties with an assigned mission and/or purpose? Does the agency promote heritage tourism and how are you addressing historic properties in Freeze the Footprint? Explain the overall condition of the historic properties within your agency's control and efforts to improve the condition. 13Have you incorporated these policies into your agency's strategic plan? Explain how your agency has used Section 111 of NHPA and the use of partnerships. Describe your agency's sustainability goals and climate change adaptation planning.

VA-wide CFM

In May 2014, based on information prepared and presented by CFM, the Secretary gave approval for VA to proceed with developing a Section 111 leasing program. The preservation office is working closely with Real Property Service, the division of CFM assigned to develop the program guidance since they have responsibility for real property leasing.

In addition the FPO office works closely with OEAM EUL program managers to provide assistance and advice to ensure preservation mandates are met as they develop new leases. With limited authority for EULs, VA sees section 111 leasing as an opportunity to reduce underused space and preserve historic buildings.

FPO actively supported the assessment and reuse of Building 45 on the Milwaukee campus. This is a contributing element to the National Historic Landmark district.

Finally, the preservation staff issued a white paper, VA Alternatives to Demolition of Historic Real Property, in March 2013. This discussed not just EULs and section 111 but other authorizes allowing for disposal.

The FPO is working closely on the proposed realignment of the Hot Springs, SD, campus stressing the importance of adhering to the Administration's direction on

streamlining regulatory compliance and the recent ACHP/CEQ joint guidance on integrating section 106 and NEPA.



Figure 5 - Administration building Hot Springs VAMC

OAEM

OAEM plays a major role in re-use of historic properties through the EUL program. While recently reduced in scope, the EUL service at risk veterans by providing stable long term and transitional housing. Vacant or underused historic buildings are a key opportunity to address these needs.

EUL Overview

EUL is an innovative real property portfolio management tool. Through this program, VA out-leases underutilized assets to the private sector for up to 75 years. EULs provide Veterans with access to an expanded range of services that would not otherwise be available on VA medical center campuses.

Eliminating Veteran homelessness by 2015 is one of VA's top priorities. Through EUL partnerships—such as the ones featured in this edition of Program Highlights—EUL housing projects contribute to that worthy goal by using the Department's underused real estate as part of the solution.

Each EUL housing project is structured to provide some type of permanent or transitional housing for homeless or at-risk Veterans, senior or returning war Veterans. In most cases, the housing is designed to also accommodate families of resident Veterans.

The EUL agreements require sustainable design, incorporate supportive services for Veterans, and feature recreational areas and other amenities.



Tuscaloosa, AL - Valor Grove

Located on the grounds of the historic Tuscaloosa Alabama VA Medical Center (VAMC), Valor Grove will provide 50 units of permanent supportive housing (25 units of new construction and 25 renovated units in Building 33). Construction and renovations are underway. The complex is expected to be in operation by November 2014.

Envisioned as a place of solace and healing for Veterans facing the threat, or in some instances the reality, of homelessness in their lives, the individual units will be designed with "home" in mind. The facility will be open to all Veterans, while services and programs will initially be designed specifically with women Veterans and Veterans with families in mind.

Tuscaloosa's One Place, a comprehensive family resource center, is partnering with Valor Grove, Ltd (the developer/ lessee) to support the operation of the facility and its programs.

Newington I, CT - Victory Gardens

The first of two EULs to take place at the VA Connecticut Healthcare System - Newington Campus, Victory Gardens (a long-term EUL with Women's Institute for Housing and Economic Development, Inc.) includes 74 units of permanent housing for homeless and at-risk Veterans and their families.

This project involved both renovation and new construction. With over 150,000 square feet of improvements. Victory Gardens housing community opened in May 2013 and is fully occupied by Veterans and their families.

Hines, IL - Freedom's Path

On May 22, 2014, the Hines Veterans Residences Limited Partnership (developer/lessee), in partnership with the Edward Hines, Jr. VA Hospital, hosted a groundbreaking ceremony for the Freedom's Path Apartments.

Freedom's Path Apartments will consist of an elevator-equipped three-story building of approximately 63,000 square feet. The complex includes 72 efficiency and one-bedroom units, each with a private bath, plus one efficiency guest unit for overnight guests to rent.

The community amenities will include onsite management, a fitness center, a clubroom, technology center/library, laundry facility, additional communal areas, and break-out rooms for therapy and special needs services. The initial project will feature 36 parking spaces, a covered driveway at the entrance, seating area with a fireplace, Ping-Pong table, and a basketball court. Construction is expected to take 12 months to complete.



Rendering of Freedom's Path

Roseburg, OR - Eagle Landing

Since its Grand Opening in November 2013, the Eagle Landing residents have been actively settling into their beautiful new homes and community. The Eagle Landing development includes 54 units of permanent housing with supportive services designed to help homeless and at-risk Veteran residents achieve self-sufficiency and long-term independence.



Eagle Landing Community Garden

All units are leased, and some of the activities offered include:



Neighbors Establishing Stability and Togetherness (NEST)

Leavenworth EUL wins NTHP award

Leavenworth EUL won a preservation award in 2012 and has just recently completed renovation on the final building.

This project is a model example of grassroots preservation campaigns and public-private partnerships. The adaptive reuse and rehabilitation of a historic mess hall (C 1886) saved a building on the National Trust's 11 Most Endangered Historic Places list and provided a 58,787-sq-ft office/medical records center for the VA.

When the VA announced its plans to demolish 38 historic buildings many in the community objected but didn't know how to voice their concerns. Luckily, a small group of preservationists in Leavenworth knew that the public had a say in the future of the Western Branch NHDVS historic district. This group founded the VALOR organization and transformed the public's perceived helplessness and to empowerment. VALOR members approached preservation advocates for assistance and discussed the community's concerns with government officials. This grassroots effort proved that every voice does count by gathering and utilizing public opinion and personal stories to effectively communicate the importance of the NHDVS in the community. VALOR's efforts led to the Section 106 Review, the 11 Most Endangered Historic Places listing and eventually the preservation of the historic district. VALOR's impact on the historic district is exemplified by the EUL agreement between the VA and Pioneer Group. This agreement is widely considered an excellent example of a public-private partnership. The partnership allowed the VA to redirect its operating budget from maintaining vacant buildings to serving veterans, and the buildings were saved from demolition by Pioneer Group. The adaptive reuse and rehabilitation of Building 19 is just one successful example of the partnership. The project was funded using private investments from Pioneer Group, state and federal historic tax credits and an Economic Development Grant provided by the City of Leavenworth, County of Leavenworth and the Leavenworth

The Eisenhower Ridge Association, lead by private developer Pioneer Group, was awarded the 75-year lease to rehabilitate the district buildings for new tenants. Of all the buildings in the district, Building 19 was considered to be the most difficult to identify an occupant for by Pioneer Group because it was the largest. However, they knew they had found the perfect occupant when the VA released a call for location proposals for the new Central Plains Consolidated Patient Accounts Center (CPAC). The project preserved Building 19's historic character-defining features while adding modern amenities for the office and medical records center. The historic plaster walls, woodwork, doors and ornate metal columns were restored. The project utilized both state and federal historic tax credits as well as an Economic Development Grant provided by the City of Leavenworth, County of Leavenworth and the Leavenworth County Port Authority.

This project brought 400 new jobs with an annual estimated payroll of \$24 million in economic purchasing power to the Leavenworth area. The rehabilitation process itself involved \$14 million in construction, architectural, engineering, legal, accounting, and consulting fees.

Sustainability

VA prepares and submits a Strategic Sustainability Performance Plan (SSPP) annually in accordance with EO 13514. While the 2014 document does not specifically address historic properties, it does make numerous references to VA's Sustainable Design Manual, which provides discussion of sustainability as it relates to historic properties. As for the Agency Adaptation Plan, VA is in the process of developing its Climate Change Adaptation Plan.

VA currently addresses climate change adaptation using very general requirements. As VA continues to develop detailed adaptation guidance, that guidance will incorporate historic property considerations.

VA's green buildings program and sustainable design program promote the renovation of existing facilities as a first choice, rather than the construction of new facilities. For example, section 3.1.2.a (Existing Buildings Reuse) of VA's Sustainable Design Manual (May 2014) states "The principles of sustainable development encourage the reuse of existing resources. When selecting a site for a future VA project, project planners must consider reuse of existing buildings, including historic buildings, as potential sites." Section 3.2.3 (Historic Buildings) of the Sustainable Design Manual also provides general guidance related to historic building reuse and renovation.

VHA

FPO requested input from the Capital Asset Managers in the VISNs. Following are the responses.

VISN 2 -The Canandaigua VA Medical Center has partnered with public and private agencies toward the development of historic structures within the Medical Center Campus, to be used for the benefit of Veterans. An example of this is; the \$11.1 Million EUL of Building 14 for the Cadence Square Project. The economic impact of this project

was retained locally in the form of direct employment and material procurement during construction and ongoing employment during the operational phase of approximately (6) full time staff. This project was featured on the Medical Center's Facebook page, for public review.



Figure 6 - Canandaigua main building

The Batavia VA Medical Center Campus has hosted the EUL for Cazenovia Recovery. The lease utilizes a wing of the historic Building 1, within Medical Center Campus. This lease injected substantial funds into the local economy during construction and continues providing (6) full time positions ongoing for operation of the facility.

All buildings on the Canandaigua and Batavia VA Medical Center Campuses are maintained to preserve the integrity of the structure at a minimum. Buildings in use are maintained at a high quality level. Routinely, the campuses are reviewed by a contractor for Facility Condition Assessment. A report is developed which identifies the current condition, list deficiencies and quantifies probable correction cost. This report is used to prioritize the use of limited funds towards upkeep of the buildings.

The VA has developed EULs of underutilized buildings for the benefit of Veterans and Homeless Veterans. This was recently demonstrated by the partnership between the VA and the Cadence Square Development Corporation and Cazenovia Recovery to renovate and operate Building 14 (Canandaigua) and Building 1, 3rd Floor North End (Batavia) in support of Veterans and Homeless Veterans. The benefit to the Veterans has been enormous, due to the expansion of the continuum of care which the Medical Center is able to provide or facilitate. The new programs offered complement the existing mental health programs within the Medical Center for substance abuse and the elimination of Homelessness of Veterans.

VISN 5 - Perry Point has a link on their webpage discussing the historic significance of the facility.

Perry Point also has representation in the Lower Susquehanna Heritage Greenway Trail (LSHGT) committee sessions with the neighboring Town of Perryville. The LSHGT is a hiker-biker path with a focus on the historic properties found in the area, including the Perry Point mansion house and grist mill.

Fort Howard is pursuing an EUL that would make improvements to the existing buildings and incidental infrastructure of this former Army fort.

Perry Point was pursuing an EUL for the historic cottage village section of the campus, however public opposition has momentarily stopped this effort. The VAMC is working with VA Central Office (VACO) to seek alternatives.

Perry Point also has a project to restore the historic Mansion House and Grist Mill - two of the oldest properties in the entire VA repertoire.

For the most part, it is very difficult to justify money being diverted from direct patient care to rehabilitate or upkeep historic properties. For the VA, quality patient care is priority number one; upkeeping an old village of historic houses falls lower on the priority list, as they are not directly involved with patient care. The VA has been investigating creative ways to incorporate patient care | education with renovation of historic properties (such as EULs). This is just sometimes a hard sell to the public or any stakeholder.

One of the Perry Point historic village houses has been converted to Veterans Museum. This is open for four hours on Thursdays, and is run by a volunteer. In the museum are artifacts found at the Perry Point facility as well as some historic pictures. The Perry Point Veterans Museum is open to the public.

VISN 7 - The CNVAMC has not pursued the use of heritage tourism or partnerships as a use of historic properties. Their historic buildings would require significant renovation to make them compliant with current Life Safety Code standards.

The Maintenance and Operation department maintains the exterior of these buildings for weather protection. The water, natural gas and steam services to each of the five buildings have been turned off to prevent potential leaks within the unoccupied structures.

The CNVAMC has an active volunteer program. The volunteers are not used in the management or interpretation of our historical properties.

Dorn Medical Center has not focused on tourism. However, Dorn does receive patients from across South Carolina and the VAMC always strives for their visit to be pleasant by the proper maintenance of the property.

Dorn Medical Center's historic structures are actively used and maintained and are in general good condition. As Dorn continues to strive to be on the forefront of medical care, once modern medical buildings are being repurposed for general office space as new buildings are required to stay up-to-date with the latest code requirements for seismic, fire code, electrical capacity, HVAC, and new medical technologies.

Dorn Medical Center has entered into long-term leases with two primary partners – The University of South Carolina and the Keenan Development. USC's lease primarily encompasses the original VA campus from 1932 and their maintenance staff abides by the state historical society when addressing renovations and repairs. Keenan

Development has currently “mothballed” several structures while it works out the legal nuances to properly renovate the structures to be commercially viable.

VISN 8 - Tourism is not a focus of VA’s mission. However, a good example of displaying VA’s heritage assets is the Florida’s Bay Pines VAMC. One of their main corridors acts as an excellent photographic display of the hospital’s history by showing photographs of the campus from its beginnings back in 1933 to the present.

VISN 8 has not historically promoted tourism of its campus and buildings. Town Hall meetings where external veteran stakeholders are invited to attend are afforded the opportunity to walk this corridor of honor. As noted above, all buildings are utilized for clinical or administrative purposes in support of the VA’s mission.

Bay Pines VA is the only campus within VISN 8 that has historic registered buildings. On average, these buildings are in fair condition, with elements of the buildings that range from poor to good condition as reflected in the VA’s Capital Asset Inventory. Some infrastructure upgrades continue to be addressed through the non-recurring maintenance (NRM) program where feasible in minimizing the impact to the interior historic elements, structure and building envelope.

The Bay Pines historic buildings have been and continue to be renovated for use in support of clinical and administrative functions. However, the layout of the building structure is a primary dictator of how the building space can be arranged.

VISN 10 – In Ohio, as a medical center with a significant portion of the population being mental health patients, the Dayton facility does not lend itself for use as heritage tourism destination. However, the Mace House has been set up as a conference center with a small museum dedicated on the second floor.

Extensive interior renovations, roof repairs and building system upgrades have also significantly improved the condition of structures B1, B9, B212, B35 and others.

One of the basic findings from the planning efforts that went into development of the Facility Master Plan for the Chillicothe VAMC was a determination that the historic “campus style” facility setting is not conducive to the efficient delivery of modern healthcare services. Too much of the potentially space that can be occupied is in buildings of obsolete design located at significant travel distances away from the primary “hospital” clinic structure, B31.

While many of the buildings, for example B1, B212 and B35, were still in good enough condition to support renovations for support services such as administrative offices, the historic style of construction and the overall building conditions significantly increase the costs associated with these efforts.

Other structures, for example B2 and B6, have been found to have extensive problems including concrete delamination on structural elements. The deteriorated physical condition of these buildings (and others), along with being inconveniently located a significant distance from the primary hospital clinic building (B31), have been sufficient to prevent any significant renovations from being funded for these buildings.

VISN 15 - As stated earlier, the EUL developer renovates and uses the buildings for mission compatible uses such as apartments and other government groups that need building space such as CPAC. The EUL developer finds groups that are looking for space where the developer creates a lease proposal where the EUL developer renovates the building to the user's needs and then leases the building for up to 75 years. The renovated properties are in excellent shape and the no-renovated buildings (vacant bldgs.) are in poor shape. The VAMC strives to find any group that would be willing to invest in renovating the buildings for mission compatible uses.

VAMC Marion has a program to incorporate the 1940's Egyptian Revival theme when rehabilitating Buildings or site facilities needing improvements. For example, the main entry drive is in the final stages of the design, we incorporated replicas of the lighting that were installed in the 1940's when the medical facility started admitting veterans for health care. Buildings that are scheduled for rehabilitation for structural reasons will be designed to preserve the integrity of the historic elements and the medical center campus.

One of the challenges in trying to preserve historic buildings and align with supporting the mission to serve the veterans is the loss in square footage. For example, a building requiring seismic/structural upgrades and accessibility will lose about 30% to 40% of the net usable space as the structural elements such as bracings and retrofit frames will take up space. In addition, accessibility and fire safety egress will also take up much of the usable space as the partitions will have to be re-configured to meet the standards.

VISN 21 – In California, VAPAHCS is currently developing a publically accessible history exhibit/interpretive display at its Menlo Park Division campus. The display will showcase the sites history spanning from 1917 to 1930, which included a WWI training camp and early Veterans Bureau Era development.

VAPAHCS currently maintains the historic resources located within its Menlo Park Division National Register Eligible Personnel Quarters Historic District. The intent is to preserve the integrity and to manage the property to maintain its historic character and to ensure that any future actions are sympathetic to the historic significance of the property.

VAPAHCS is currently completing reuse feasibility studies of National Register eligible buildings located on its Menlo Park Division campus. Reuse of National Register eligible historic resources is being considered.

The historic properties at SFVAMC need to be seismically corrected to meet current safety requirements

VISN 22 – Also in California, GLAHS has effectively promoted the renovation of historic Building 209 on the West Los Angeles campus. This previously vacated building is under renovation to provide homeless housing for GLAHS Veterans and has been effectively communicated and supported through electronic and paper media within the VA and community.

GLAHS is limited to VA and Federal Government usage of the West Los Angeles property through land use restricted Federal Law.

GLAHS has multiple projects both approved and submitted to renovate and reuse both vacant and occupied historic properties and sites on the West Los Angeles campus. GLAHS is in the process of consolidation of all historic districts to a single all-encompassing National Register for the West Los Angeles Campus.

The medical center has 120 acres and 39 buildings in the West Los Angeles Campus that is comprised of dozens of historically eligible buildings and property. Capital projects to properly renovate these structures to current medical center standards requires significant funding and in some cases is not feasible, however GLAHS continually coordinates with the State Historic Preservation Office to develop and protect historic properties on campus

NCA

See Section 2 for NCA's program specific report.

Conclusion

The Department of Veterans Affairs is proud of the responsibility it holds to be a good steward to its important and unique historic properties. We are equally proud of the efforts of our preservation staff as they continue to strive to develop and implement a comprehensive historic preservation program.

PART TWO – NATIONAL CEMETERY ADMINISTRATION

National Cemetery Administration ONLY

Preserve America, E.O. 13287 Section 3 Report

Identification

Agencies that own or control historic properties are responsible for the identification, evaluation, nomination, protection, and use of historic properties under their ownership consistent with Section 110 (16 U.S.C. § 470h-2) of NHPA and Section 3(c) of E.O. 13287. Agencies may use their preservation programs to improve their inventory of historic properties. An agency's preservation program may meet these responsibilities in coordination with its real property-based record keeping program and through other systems developed to comply with government-wide auditing or accounting requirements.

Explain how many historic properties have been identified and evaluated by your agency in the past three years? Has your inventory improved? Please explain.

NCA historic resources are quantified at two levels: as cemetery properties composed of acres (historic or cultural landscapes), of which 154 exist; each cemetery property then contains a range of buildings, structures and objects.

Records of the existence and condition of all capital assets, including historical assets, are maintained in the Capital Asset Inventory (CAI) database. Recent improvements to CAI mean that NCA cannot provide data for all years covered in this triennial report. The CAI "flag" for "heritage assets" was introduced in fiscal year 2014. The information on heritage assets for fiscal year will serve as a baseline for all future years and reporting requirements.

Evaluate progress in identifying and evaluating historic properties. What is the total number of historic properties within your inventory?

	"Heritage" Assets+	"Historic" Assets+	FRPP Buildings & Structures
FY12	1,772	1,561	1,057
FY13	--	--	1,203
FY14	2,017	1,922	1,220*
+ CAI data is a snapshot in time, the data for FY11 and FY13 is unavailable. Preparations are made for recording future reporting requirements.			
* FRPP Buildings and Structures data, FY2014, is an estimate. Data to create a snapshot at for the end of FY14 will be pulled after the submittal of this report, and annually, to support the next triennial report.			

NCA Capital Asset Inventory: Breakout by Historic Resource Type – FY2012-14				
	Buildings	Structures	Objects	Totals
FY12	--	--	--	
FY13	--	--	--	
FY14	147	79	1,791	2,017

Within your inventory, what is the total number of cultural resources that have not been evaluated for eligibility to the National Register of Historic Places?

Within the NCA inventory, approximately 2,017 cultural resources have not been evaluated for eligibility to the National Register of Historic Places. This number is particularly important to NCA as the NRHP Acting Keeper on September 8, 2011, issued a benchmark determination--a "Clarification of Policy"--concerning the eligibility of national cemeteries for all "developed" properties. She explained:

"All national cemeteries are considered exceptionally significant as a result of their Congressional designation as nationally significant places of burial and commemoration. This means they meet the special requirements set forth in the National Register Criterion Considerations for cemeteries, graves, commemorative properties, and resources less-than-50 years of age. It also means that for the purpose of documenting a national cemetery as a National Register district, facilities and sections developed within the past fifty years are considered significant and are eligible for National Register listing as contributing resources."

As a result of this NPS clarification, NCA classifies all of its non-historic or eligible resources as "not evaluated for eligibility" for the NRHP. These are generally structures and objects constructed in the past 30 years as part of cemetery operations development. Eligibility of non-evaluated resources will be determined through the NHPA Section 106 consultation process when NCA identifies an undertaking that may have an effect on the cemetery property.

How have these numbers changed in each of the last three years?

NCA is responsible for 131 developed national cemeteries and 33 soldiers' lots and Confederate lots in the United States and Puerto Rico. This encompasses 20,496 acres and 3.2 million gravesites.¹ Inventoried resources determined to be "historic" assets (2,107) fall into three categories: 147 historic buildings, 79 structures, and 1,791 objects, per CAI.

In the past three years, the quantity of cultural resources recognized as historic and those "not evaluated" has increased. Several factors must be considered in order to explain how NCA knows this; numbers should be considered estimates until inventory data is verified.

- Starting in 2012, the NCA Budget office initiated an enhanced Facility Condition Assessment contract that for the first time captures all objects at NCA properties--monuments, gates, plaques, signage, etc. This inventory is not complete for all regional Memorial Service Networks, and the History Program has not verified the categories as submitted to NCA. The monuments and a large number of signage/plaques are historic. At this time an estimated 1,791 objects have been added to CAI as part of the FCA process in the past three years.
- In late 2011, the Acting Keeper of the National Register of Historic Places determined that all national cemeteries--including built and natural features--are eligible for listing on the NRHP regardless of their age. For building and structure resources that are less than 50 years old, NCA categorizes these as "Not Evaluated" yet.

¹ Acreage is from FY 2012 Statistical Report, the most recent available.

- CAI data that existed prior to fiscal year 2011 has been partially reviewed to remove duplicate entries, to correct dates and historic status.
- Cemetery audits conducted by Field Program personnel to verify the locations and identification information inscribed on individual headstones and markers (government issued and private) have resulted in improved accuracy of interments and locations of graves.

What is the total number of those historic properties that have been identified or evaluated as a “National Historic Landmark,” “National Register Listed,” or “National Register Eligible” for each of the past three years? How have these numbers increased in each of the last three years?

National Register of Historic Places Listings/National Historic Landscape Designations

During the past three years, NCA has made significant progress toward increasing identification and evaluation of its historic resources, as well as refining our understanding of existing documentation.

Of NCA’s cultural landscape properties: 14 are included within the boundary of National Historic Landmarks, 95 are listed on the National Register of Historic Places (NRHP), and approximately 20 draft NRHP nominations are well underway. Copies of all completed nominations are available on the NCA web site (go to: http://www.cem.va.gov/CEM/pdf/nrhp/NR_NHL_Listings.pdf).

- Dayton National Cemetery, a component of the former Central Branch, National Home for Disabled Volunteer Soldiers, was designated a NHL.



Figure 1 Dayton National Cemetery, 2012.

- Two NCA properties were listed as part of historic districts under the Second Generation VA Medical Center Multiple Property theme: Bath National Cemetery, NY, was listed in January 2013; Bay Pines National Cemetery, FL, was listed in June 2012.
- Togus National Cemetery, a component of the former Eastern Branch-National Home for Disabled Volunteer Soldiers, was also listed.
- Individual national cemeteries at Fort Richardson and Sitka, AK, and Fort McPherson, NE, have been listed.
- National Memorial Cemetery of the Pacific, an NCA property, was documented in 1976, but the early nomination lacked substantive historic context and detailed descriptions. A comprehensive NRHP amendment was developed as mitigation for the American Battle Monument Commission's expansion of its Honolulu Memorial, located at the cemetery. The amendment, containing enough information to serve as a new nomination, has been submitted to the National Park Service for signature and acceptance is anticipated in fiscal year 2014.



Figure 2. National Memorial Cemetery of the Pacific, 2013.

- In the past three years NCA has also endeavored to review existing or proposed new NR/NHL documentation to clarify if some cemetery resources are included in the periods of significance and boundaries. For example, Camp Nelson Historic and Archeological District NHL, listed February 2013, includes the cemetery but not its built environment, headstones or landscape features.

NRHP Nominations in Progress

Three years ago, NCA reported its oversight of two contracts that would result in (15) NRHP nominations: one Multiple Property Submission for seven Inter-World War cemeteries and eight others that are 50 years or older but not related thematically. All were 90 percent or more complete as of fall 2012. At that time NCA leadership indicated that it sought to review the History Program's work toward nominating its cemeteries to the NRHP; we have not submitted any nominations since.

Nevertheless, VA's Historic Preservation Office funded a project to complete the Interwar cemetery series in fiscal year 2014, a contract the NCA History Program is managing. This work will result in nominations for the following national cemeteries: Baltimore, MD; Golden Gate and Fort Rosecrans, CA; Fort Bliss and Fort Sam Houston, Texas; Long Island, NY; and Fort Snelling, MN. Draft nominations also exist for: St. Augustine, FL; Black Hills, SD; Ft. Logan and Ft. Lyon, both in CO; Santa Fe, NM; Eagle Point, OR; Los Angeles, CA; and Willamette, OR.

Four major Confederate cemeteries managed by NCA are slated to be nominated, an outgrowth of a broader Confederate properties history study. Draft documents exist for: Confederate Mound, Oak Woods Cemetery, Illinois; North Alton Confederate Cemetery, Illinois; Point Lookout Confederate Cemetery, Maryland; and Woodlawn Cemetery's Confederate Monument, Indiana.

NCA Historic Resources Listed/Designated as Historic or Forthcoming – FY2012-14					
	New NHLs	New NRHPs	Draft NRHP nominations	Complete NRHPs Awaiting/In Consultation	Total NCA Listings
FY 2012	2 *	5	15	0	90
FY 2013	0	2	15	0	95
FY 2014	0	0	11	7	95
* Designated NHLs already listed on NRHP are not counted in "Total NCA Listings."					

Historic Resource Studies

NCA has initiated and completed historic studies meeting Section 110 requirements, based on primary research and field survey undertaken by contractors and National Park Service partners. In the past three years this documentation has substantially enhanced NCA's knowledge of some of its most significant historic resources.

- **Confederate Cemetery Historic Study.** The final phase of a Confederate Cemetery Historic Study began in fiscal year 2012 and will conclude in calendar year 2014. The document identifies historic resources affiliated with eighteen NCA Civil War-era properties that contain large numbers of Confederate burials. This definitive study explores the origins of nine national cemeteries containing in excess of about 250 Confederate graves, and nine Confederate-only burial sites that are generally associated with prisoner-of-war camps. Developed by a contractor with the assistance of NCA historians, the content covers the federally-established Commission for Marking Graves of Confederate Dead (1906-1912), headstones and monument memorialization flags, ladies' and Veterans' organizations and authorizing laws. NCA will release a Government Printing Office-published paper book and make a downloadable, online version available to the public in 2014. The first phase of this research occurred in 2008-09.



Figure 3 Confederate Stockade, Sandusky, OH, a designated NHL that contains The Lookout monument; view 2012 and the monument unveiling in 1910.

- **HALS Lodge & Rostrum Study.** The Historic American Landscape Survey (HALS), National Park Service, project to generate written studies based on primary research, and representative measured drawings, to document all of NCA's lodges and rostrums begun in 2011, was completed in fiscal year 2014. The study resulted in separate historic contexts illustrated with photographs and drawings, about how these two types of resources evolved; individual "short forms" for individual sites were also produced. A total of 72 lodges (1870-1950) and 37 (1880s-1950) rostrums were documented.

In addition to the historical research, architects developed six sheets of measured drawings of the lodge at Finn's Point, NJ, as a well-reserved example of a Second Empire. HALS made drawings of three rostrums to represent the

variety found through the national cemeteries in order to support potential construction projects in the future. Drawings of the “tool house” (1887) at Alexandria, VA, were warranted as it is the only extant example of this formerly common service building. All records will be available to the public through the Library of Congress, where large-format photographs of NCA’s pre-1960 properties are already housed.

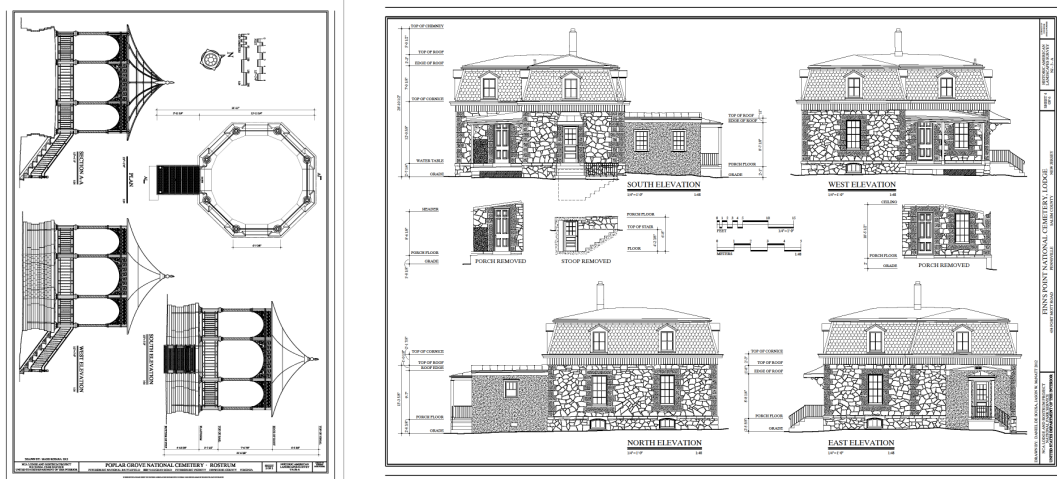


Figure 4. Measured drawings: Finn's Point National Cemetery (NCA) and Poplar Grove National Cemetery rostrum (NPS, right). National Park Service, Historic American Buildings Survey.

- **Togus National Cemetery Historic Headstones.** In fiscal year 2012, the NCA developed an historic study in which a contractor evaluated 3,808 significant headstones located in the West section (1867-1936) of Togus National Cemetery, ME. The study includes an inventory, historic context, GIS mapping, photographs of headstones linked to a database with location of grave, name and service information and spelling variants.

The project was a study to determine if the Administration should pursue a headstone “raise and realign” and turf renovation project; this undertaking has the potential to alter the historic landscape. The oldest burials here are marked by fragile granite uprights in sockets; the rocky landscape means graves are shallow. Togus headstones were organized into five types; recommendations are based on the form, age and condition and include a combination of repair, conservation and replacement in-kind. The recommendations reflect minimal removal of historic headstones and repairs that would meet the Secretary of the Interior’s Standards for historic properties. The findings were forwarded to appropriate offices in early 2014, but as of May NCA has not made a determination about how it may proceed with this project at Togus.

Other West cemetery historic resources were also minimally addressed i.e. granite-front receiving vault and dry-stacked stone retaining walls, both c.1867, in need of rehabilitation.





Figure 5. Atypical government headstones at Togus National Cemetery composed of granite uprights and sockets.

Databases

- Facility Condition Assessment/Capital Asset Inventory. NCA is responsible for undertaking condition assessments of its properties every three years in the form of Facility Condition Assessments (FCA). As of fiscal year 2012, NCA has contracted for this work to be completed through a VA Office of Construction and Facilities Management (OCFM) contractor. The benefit to this administrative change will result in more consistent and more accurate evaluation and ratings of condition. In addition, the scope of buildings, structures and objects under NCA management that FCA assessments captured starting in fiscal year 2013 has been substantially increased. Working with descriptions and ratings that correlate to NCA history

program definitions, FCA contractors will report back on a longer and more detailed range of historic objects. The system of “objects” addresses historic commemorative “Monuments and Memorials,” as well as some physically notable and historically significant “private headstones,” and historic tablets, plaques, ornamental cannon and related site features that technically do not serve a “memorial” function.

Each object, along with its condition, will be reported individually. To assure that historic monuments and other objects are appropriately evaluated, for the first time conservators that meet the professional qualifications set by the American Institute for Conservation are included on the FCA teams. NCA historians then review historic-object entries to verify if the object and condition as reported is appropriate. FCA data is used to populate and update NCA’s Capital Asset Inventory (CAI) database.

MSN 1						Allegany Cemetery Soldiers Lot	
	year built	last revised	# books	total ytd	status		
HA - 1	1078	2000			yes	 	
system						description	
	condition	total funds	acquired	retirement	total costs		
Monuments & Memorials							
Monument	BC					<p>"P" 2' x 12" marble relief of soldier beside figure of a winged cherub holding banner has two relief panels of soldiers in action. 3' x 6" relief of soldier and relief panels of General and Staff. "Soldier" panel depicts soldier in action. "General" panel depicts General in uniform. "Staff" panel depicts staff in uniform. "P" panel depicts "P" in uniform. "P" panel</p>	

ReDiscovery Collections Management Database – FY2012-14			
Year Added	Monuments	Postcards	Books & Ephemera
FY 2014 (partial)	25	29	0
FY 2013	68	2	11
FY 2012	15	30	0
RED Total	1,156	208	269

What is the total number of your agency's property, plant, and equipment that have been identified as heritage assets for each of the past three years?

Between fiscal 2012 and 2014, an additional 175 heritage assets were identified within NCA's holdings (see Table page x). Information for fiscal year 2013 is unavailable because the NCA CAI maintains current information, including that of heritage assets. The intent of the inventory is to depict a snapshot of all NCA assets. Information from past fiscal years was not requested at the time and is not available for this report.

NCA does not have any plant or equipment categorized as historic assets.

Describe your agency policies that promote and/or influence the identification and evaluation of historic properties. How does the identification of historic properties and heritage assets relate to your agency's mission?

NCA's mission is to provide memorial and burial benefits to Veterans and eligible family members and preserve these cemeteries in perpetuity as national shrines to their sacrifice. More than half of NCA's cemeteries originated with the Civil War

(1861-65), when they were managed by the War Department. The identification of historic properties and heritage assets is essential to preserve the physical attributes of our heritage.

According to one of NCA's Strategic Plan goals, national cemeteries are "National Shrines dedicated to preserving our Nation's History, nurturing patriotism, and honoring the service and sacrifice Veterans have made." The History Program office verifies the accuracy of records developed for historic and heritage assets associated in the CAI database, which is managed by the NCA Budget Office.

New National Cemeteries & Related Initiatives

NCA opens new national cemeteries or expands existing ones to provide burial benefits to Veterans per 38 CFR Part 39. The past three years, this plan includes activity toward achieving five new traditional national cemeteries, eight Rural Initiative sites and eight Urban Initiative sites:

- Colorado Springs County, CO, is on schedule for a new national cemetery after NCA purchased 374 acres of the former Rolling Hills Ranch, in January 2014.
- In July 2013 purchased 247.4 acres in Morovis, Puerto Rico, to prevent the loss of burial benefits to Puerto Rico's Veterans when the Puerto Rico National Cemetery, located in Bayamon, closes to casketed interments in 2022.
- Genesee County in Western New York, 132 acres, required a Cultural Resources MOA between VA, SHPO, and Seneca Nation; it was finalized in May 2014. The Secretary of Veterans Affairs issued the Finding of No Significant Impact and closing on the purchase the same month. Archaeological sites will be adversely impacted.
- In March 2012, the new Louisiana National Cemetery in Zachary, LA., was dedicated. This 103-acre "annex" to nearby Port Hudson National Cemetery, was developed in order to avoid potential Adverse Effects if NCA pursued additional burial sections on land that is contained within the boundaries of a National Historic Landmark district associated with Civil War military action. As part of the

non-contiguous cemetery expansion, the historic Port Hudson lodge, 1879, has been vacated by NCA personnel.

- Two new VA national cemeteries are planned in Florida. VA purchased the former Acosta Groves, 318 acres, for Cape Canaveral National Cemetery in Scottsmeer, in July 2012. Tallahassee National Cemetery, a 250-acre parcel in Leon County, will serve the Tallahassee area, as well as southwestern Georgia and southeastern Alabama. In August 2012 VA purchased the Tallahassee property.

Rural Initiative cemeteries or National Veterans Burial Grounds

Launched in August 2012, Rural Initiative cemeteries or National Veterans Burial Grounds are small, VA-managed parcels of three to five acres within an existing public or private cemetery. VA will provide a full range of burial options and control the operation and maintenance of these lots. These sections will be held to the same “national shrine” standards as VA-run national cemeteries. Projects are open or in the planning phase at the following sites:

- Yellowstone Country Veterans Cemetery in Laurel, MT, was dedicated in May 2014; renamed Yellowstone National Cemetery, it is the first scheduled to open over the next three years, providing burial options for rural Veterans and their families within 75 miles of their residences.
- Site consideration and reviews remain active at multiple sites where due diligence is underway: Fargo, ND; Cheyenne, WY; Twin Falls, ID; Calais, ME; Rhinelander, WI; Elko, NV.

Urban Initiative

Urban Initiative cemeteries are burial sites will be exclusively for cremated remains at eight locations, most of which are in the process of consideration.

- NCA is evaluating establishment of a columbarium-only property in New York City, NY.

- NCA efforts to locate suitable property to serve the Chicago, IL, area continue. One community targeted was Long Grove, Illinois' first historic district, but the community would not waive covenant requirements. NCA renewed its search as of spring 2014.
- Property in Indianapolis, IN, has been identified and VA is pursuing due diligence requirements and hopes to acquire the property in summer 2014.

What is your agency's policy for the stewardship of historic properties and heritage assets?

NCA is a steward of its properties and, as requested, advises other government agencies responsible for cemeteries containing large numbers of Veteran graves on the burial benefits available to them from VA. NCA provides headstones and markers for Veterans worldwide. For private or other cemeteries designated as historic or eligible for listing on the NR, this typically involves the provision of large numbers of in-kind headstones and markers to replace unserviceable or missing historic headstones this is an undertaking, per Section 106, NHPA. During this triennial reporting period, NCA has assisted with historic preservation planning at two facilities:

- Poplar Grove National Cemetery, a unit of the National Park Service (NPS) associated with the Civil War, has been the subject of a planned, comprehensive landscape rehabilitation project for several years. In June 2013, a multi-stakeholder kickoff meeting was held that included NCA, which will provide approximately 5,700 in-kind headstones to mark graves at that cemetery, and provide guidance about setting and aligning headstones. NCA is a signatory on the fiscal year 2014 Programmatic Agreement that will guide this NPS project.
- A representative for the historic cemetery managed by the District of Columbia government on the East Campus of St. Elizabeths Hospital requested assistance from NCA to provide headstones as part of a landscape restoration project. In February 2013, the NCA senior historian attended a tour and meeting to discuss options for headstone provision. The hospital will be developing a plan and will continue to consult with NCA when it is prepared to move ahead. The St. Elizabeths campus is a DC Historic Landmark and National Historic Landmark.

What are the definitions of the major categories your agency uses to classify heritage assets? (see Figure next page)

Buildings:	Lodges/offices, service buildings, former chapels
Structures:	Rostrums, walls/fences
Objects:	Memorial monuments, private headstones, flagpoles, signage/plaques, ornamental cannon, archeology artifacts
Landscape:	Cemetery within boundary

Nomenclature for NCA Cemetery Features (43A4)

Buildings (B)

Administration Office
Administration/Chapel combination
Chapel
Columbaria (*@ Los Angeles*)
Garage
Gatehouse
Hemicycle (*(multipurpose @ Houston)*)
Lodge
 "Meigs" (*(Second Empire)*)
 Other
Maintenance facility
Pump house
Residence/dwelling
Restroom
Utility

Structure (S)

Archway (*(monumental entrance)*)
Bridge (*(vehicular, pedestrian)*)
Carillon tower
Columbaria
Committal shelter
Court of Honor (*(@ P.R.)*)
Crypt/Receiving Vault or Tomb
Drainage ditch/Canals
Fountain
Fuel tanks (*(gasoline, butane)*)
Gates
 Entrance
 Postern
Memorial walkway
Ossuary (*(ash scatter area)*)
Reservoir/cistern (*(underground/above)*)
Road
Rostrum
Storage (*(well, pump)*)
Tunnel
Wall/fence
 Enclosure
 Interior
 Grave bed
 Retaining
Well

Objects (O)

Headstone/Marker (*(* w/human remains)*)
 Government (*(group, comingled, single)*)
 Private (*(group, comingled, single)*)
Memorials/Monument (*(*no human remains)*)
 Cenotaphs (*(Congress 'l Cemetery only)*)
 'Commemorative Work' (*(> Standard, below)*)
 Standard (*(plaque/base, stone; size limit)*)
 Gov't headstone-style (*(memory of)*)
 Trees (*(i.e., Bicentennial)*)
Plaques (*(generally 19th-early 20thc)*)
 National Cemetery Act (*(c1880, 1939)*)
 General Orders No. 80 (*(c1880, 1939)*)
 Memorial Day Order (*(c1880)*)
 Bivouac of the Dead (*(c1880, 2003)*)
 Gettysburg Address (*(c1911, 1939, 2009)*)
 Cemetery ID Plaque (*(aka cannon, c1867)*)

Signage (*(generally contemporary)*)
 Entrance sign
 Soldiers' Lot plaque (*(c1973)*)
 Name/VA Seal on gate posts (*(two, c1973)*)
 Interpretation (*(panel on metal base)*)
 Section Markers/IMO section
 Tree memorial/Bicentennial (*(tree is memorial)*)
 Service insignia (seals)
 National Register of Historic Places list

Site Features
 Arbor/trellis
 Benches (*(fixed & permanent)*)
 Boundary posts (*(soldier lot, trenches)*)
 Cannon/artillery
 Fencing, interior (*(internal private lots)*)
 Flagpole circle/plaza
 Overlooks/Observation areas
 Paths/walkways
 Pool/pond/stream
 Trench burials

Flagpole
 U.S.
 POW
 Avenue of Flags

Archeological

Above ground (*(building fragment)*)
Subsurface (*(grave goods, lithic)*)

Figure 7. Nomenclature and categories of historic resources found within NCA properties.

How does your agency define real property?²

Per VA Financial Policy Volume V, Chapter 9: “Real property consists of Federal facilities and installed equipment, to include real property acquired through capital leases and leasehold improvements, and real property owned by VA, but held by others.” Real property may include:

- Leasehold improvements include improvements made to PP&E acquired through either a capital or operating lease.
- Land, buildings, other structures, and land improvements, to include water and sewage systems, roads, sidewalks, and other improvements.
- Other structure is an asset not classified as another real property category (e.g., parking garages, open-sided sheds, water towers, generators, solar panels, and windmills). The asset may be a structure or system serving more than one building or structure as one asset and is not building service equipment. The asset is carried as one asset in the subsidiary records. Other structures (or other real property) are generally classified as BOC 3240 or 3241 titled, *Other Structures (or Facilities)*.
- Leased real property, whether owned commercially or by the General Services Administration (GSA).
- Building service equipment, which is an integral part of the real property for the purpose of rendering the building or structure usable or habitable and permanently affixed.

² VA will recognize Real Property when it: Has an estimated useful life of 2 years or more; has been acquired or constructed with the intention of being used or being available for use by VA; has met the VA minimum acquisition cost or fair market value (FMV) threshold, as applicable of \$100,000, prior to October 1, 2013; or \$1,000,000 on or after October 1, 2013, and is not intended for sale in the ordinary course of VA operations. Capitalization threshold comes from VA Financial Policy, Vol. V, Chapter 9, page 10.

Describe your agency's policy on the evaluation and nomination of historic properties to the National Register of Historic Places as required by Section 110 of the National Historic Preservation Act.

The vast majority of NCA properties are listed on the NRHP, many since the 1990s.

Three years ago, NCA reported its oversight of two contracts that would result in 15 NRHP nominations: one Multiple Property Submission for seven Inter-World War cemeteries, and eight others that are 50 years or older but not thematically related. All were 90 percent or more complete as of fall 2012, when NCA senior leadership directed the NCA History Program to cease NRHP preparation while it reviewed the NRHP nomination process. NCA has not submitted nominations since.

As of fiscal year 2014, the FPO has funded the completion of NCA's Interwar nominations. The overarching historic context sets the background for the national cemeteries constructed between the World Wars (1934-1939). The context and six of the nominations are approximately 95 percent complete. The project will bring the context and all seven nominations to completion and ready for submittal to the NRHP. The properties to be nominated are: Baltimore, MD; Golden Gate and Fort Rosecrans, CA; Fort Bliss and Fort Sam Houston, TX; Long Island, NY; and Fort Snelling, MN, will occur with approval from NCA senior leadership.

How has your agency maintained a Section 110 program in light of limited agency budgets?

Section 110 is the responsibility of the NCA History Program, which is composed of a senior historian and two staff historians. All three meet the Secretary of the Interior's professional qualifications for historic preservation. A draft History Program directive has been underway for several years, and it codifies the activities and role that historians undertake that support Section 110 documentation. NCA historians undertake projects or perform oversight as Contracting Officer Representatives on projects that are performed by contractors.

The History Program actively identifies, evaluates, protects, and nominates properties to the National Register of Historic Places under the jurisdiction of the administration. While all properties are considered eligible by the Keeper of the National Register in accordance with the September 8, 2011, "Clarification of Policy," NCA continues to write nominations for the national cemeteries established until

1965. The History Program has pursued other documentation projects described in this report, including HABS/HALS documentation that will reside in the Library of Congress.

1VA+ Program Funding. Periodically VA and NCA have made available funds that would expire at the end of the fiscal year available through the 1VA+ Program for historic preservation planning. These funds cannot be used for construction activity. NCA historians have used these funds to accomplish historic planning work, including the HALS Rostrum and Lodge documentation. The guidelines and criteria for using these program funds are established each year.

How has your agency established goals for the identification and evaluation of historic properties including if they have been met?

NCA has not established identification and evaluation goals. Based on the aforementioned identification projects, NCA is confident that all properties established during the Civil War and through 1965--when Houston National Cemetery was developed--are inventoried. No other national cemeteries were established until after 1973 when most such properties were transferred from the Army to the Veterans Administration. From this date new cemeteries were initiated by the National Cemetery System. NCA's confidence in its inventory is based on the high level of historic-resource documentation collected through draft and listed NR nominations, the HALS rostrum and lodge historic studies, and enhanced FCA/CAI inventory including monuments and objects.

While NCA has not established goals for the identification and evaluation of historic properties beyond 1965, it has identified the need to establish a process and guidance to identify what is not historic or not contributing at less-than-50 year old cemeteries. This is required based on the Keepers "Clarification" and expectation that Section 106 consultation requires careful identification of what is neither a historic resource nor contributing feature per Section 106 compliance activities so the Administration can continue to expand, renovate and remove components of the developed cemeteries.

NCA undertakes Section 106 compliance activities when it acquires land for new national cemeteries, the new and smaller Rural and Urban Initiative burial grounds, and provides grant funding to tribal and state offices to develop and or improve state Veteran cemeteries.

Has your agency established performance measures (such as benchmarks) for measuring progress in the identification of historic properties?

NCA Operational Standards and Measures 4.0 (October 2009; http://vawww.nca.va.gov/business_imp/bus_stdmeasure.asp) sets NCA standards for performance in key cemetery operational areas--interments, grounds maintenance, headstones/markers. These standards and the measures that accompany them have been approved and endorsed by the Under Secretary for Memorial Affairs and other NCA senior managers. The purpose of these standards is to provide guidance and direction for maintaining national cemeteries as the shrines they are intended to be."

"Historic" headstones/markers are defined as installed 50 or more years ago. "Historic Significance" is defined as, "A combination of age, material, inscriptions, uniqueness of design, artist, etc., which contributes to the historical integrity of a monument, headstone, or marker within a cemetery."

Standard 4.4: Headstone, marker and niche cover inscriptions are visible and legible, as appropriate for the age, and historic significance of the marker. The measure for standard, the only one that considers historic relevancy, is that the percent of historical headstones, markers, and niche covers replaced during the past 12 months that are replaced with a headstone, marker, or niche cover of the same dimensions, material, inscription, and features, i.e., in-kind, 100 percent.

In 2013, the History Program worked with NCA's Policy and Planning Service to develop a draft Internal Controls and Risk Assessment module. This analysis identified three key business processes—historic research, historic collection management, and historic preservation—and multiple opportunities to mitigate risk and improve performance. Implementation of these improvement opportunities may improve performance and enable the program to more effectively utilize its resources. The document will be finalized in calendar 2014.

Do any Cemetery Grounds Management Plans - include identified historic features?

If your agency has established benchmarks, how have they benefited your agency?

The identification of historic resources requires ongoing research into the Administration's historic record, and the ability to collect documentation and artifacts to support that. The most recent, approved NCA *Strategic Plan 2011-15* contains two objectives for the History Program to achieve within "Goal 3. Ensure that VA'S National Cemeteries and state and Tribal Government Veterans Cemeteries are maintained as National Shrines dedicated to preserving our Nation's History, nurturing patriotism, and honoring the service and sacrifice Veterans have made."

NCA aims to ensure "that a comprehensive and professional historical record of NCA exists for future generations" by managing "a comprehensive NCA history program." The history program is tasked with two strategic goals: 1. Write a comprehensive historical analysis of NCA or its predecessor agencies, from its inception, and 2. Locate, design, fund, and establish a long-term archival storage facility with standard environmental controls.

However, no action has occurred on these two goals. The primary reason the study has not been initiated is the absence of staff resources.

If your agency has not established benchmarks, how does your agency measure progress?

Information gathered through the Section 106 and 110 documentation processes continue to illuminate the history of NCA properties, and this information will be used to develop the administrative history in the future.

Describe any internal reporting requirements your agency may have for the identification and evaluation of historic properties, including collections (museums and archaeological).

NCA Notice 2006-03, Reporting Memorials in VA National Cemeteries (May 1, 2006), requires that: "Each Cemetery Director will complete an annual report certifying the numbers, names and conditions of the memorials within the grounds of all national cemetery properties under his or her jurisdiction."

In addition, a report form for a new monument--along with requested materials (least two photographs of the monument/memorial, front and back, along with copies of dedication ceremony announcements, clippings, media coverage, plans or related documentary materials--shall be completed and forwarded to NCA History Program within 30 days of installation.

On an annual basis, the History Program provides project information for inclusion in the VA Performance and Accountability Report (PAR).

On an annual basis, NCA provides information about archaeological activity to the Department for inclusion in the Listing of Outlaw Treachery (LOOT) Clearinghouse.

The NCA historical architect with responsibility for NCA project-based Section 106 compliance has recently developed a checklist to assist with gathering data pertinent to projects involving historic resources. This data will be compiled and submitted to SHPOs for review and concurrence. The historical architect will provide periodic updates to the VA FPO with regard to Section 106 review and compliance, and Section 110-- identification and evaluation of historic resources.

Explain how your agency has employed the use of partnerships to assist in the identification and evaluation of historic properties. Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the identification and evaluation of historic properties?

How have partnerships benefited your agency?

In the past three years Interagency agreements between the National Park Service and NCA has afforded the History Program outstanding Section 110 products in the form of primary research, reports, historic images, and measured drawings (*See lodge and rostrum projects*). NCA also sought the expertise of NPS historical architects to stabilize five historic lodges. The time and expertise required to achieve this is not available using VA personnel.

A new agreement established between NCA and the U.S. Army Corps (Corps) in 2014 will provide design/construction services to the NCA Design & Construction

Office. The Corps will be responsible for developing SOWs, compliance documentation, design, construction, and inspection. A similar agreement will be completed between NCA and the General Services Administration.

Provide specific examples of major challenges, successes, and or opportunities your agency has experienced in identifying historic properties over the past three years and in recognition of the 50th anniversary of NHPA.

Challenges

NCA continues to develop new cemeteries or expand existing properties in which to provide burial benefits to Veterans and eligible family members. In the process of identifying appropriate acreage, it is a challenge to avoid the acquisition of historic resources it does not seek, or to re-purpose and utilize historic resources it does acquire. As an example, NCA has determined the final disposition of two historic buildings it acquired as part of developing Washington Crossing National Cemetery, Pennsylvania.

Opportunities

NCA resources are foremost cultural or historic landscapes, more than half originating with the Civil War. Although its inventory of contributing resources is increasingly complete and accurate, NCA lacks preservation planning documentation that incorporates historic trees, vegetation, vistas and historic landscape evaluation. The development of Historic Landscape Management Plans would help identify character-defining features that should be protected or restored for NCA's most historic, significant and unaltered cemeteries, or historic burial sections of expanded properties.

Successes

In the past three years NCA has been very successful at historic resource identification as a result of projects led by different offices. The Budget Office's Facility Condition Assessment (FCA) contract included historic monuments and site features for the first time, which are being cataloged as individual objects. Guidance for grading and condition descriptions was developed in concert with the History

Program. Qualified conservators participate on FCA teams where the cemeteries contain monuments. Though final numbers are not yet verified, an estimated 1,791 new objects will be added to the NCA Capital Asset Inventory (CAI) in fiscal year 2014 as a result of this expanded inventory. In addition, NCA learned much about some of its oldest and most significant resources and properties—superintendent lodges, rostrums, and Confederate burials—as a result of in-depth primary research and historic studies that met the definition of Section 110.

Protection

Agencies are encouraged to utilize a broad array of strategies for the protection of historic properties. Often the most effective form of protection is to ensure the active use of a historic property. Local governments and organizations can be effective partners for developing plans to protect and use historic properties that are considered surplus to an agency's mission.

Explain how your agency has protected historic properties. How has your agency protected, stabilized, rehabilitated, or monitored historic properties?

Buildings

Superintendent lodges, built 1870-1950, are the primary historic building type found in the national cemeteries in terms of size and prevalence; 58 lodges are extant but not necessarily in a condition to allow use. They are occupied as a residence, office space or they are vacant. NCA's priority for protection and use are the lodges built in the nineteenth century.

NCA Historic Superintendent Lodges: Use – FY2012-14						
	NCA Use	Leased	Mothballed	Demolished	Vacant*	Total
FY 2012	29	12	4	0	13	58
FY 2013	31	9	2	0	16	58
FY 2014	28	6	0	1	23	58
* Vacant indicates lodges are being rehabilitated, will be rehabilitated, or are unused.						

Lodge Mothball/Stabilization. In fiscal year 2012, VA entered into an interagency agreement with the NPS' Historic Preservation Training Center (HPTC) to mothball up to sixteen historic lodges until NCA can identify a use or tenant for them. This initiative grew out of a multi-year project (fiscal year 2008-11) in which HPTC produced 42 Historic Structure Assessment Reports, almost exclusively for lodges; NCA reported this work for the previous VA triennial period.

In fiscal year 2012 HPTC completely mothballed the lodge at Finn's Point National Cemetery, NJ. Built in 1877, vacant since 1997, this was also the lodge NCA chose to document in measured drawings by the Historic American Building Survey (HABS) as part of a larger historic context on lodges because of extant character-defining materials (Figure X-*Identification*). During fiscal years 2012-13, five other lodges were substantially mothballed; outstanding tasks are setting up security systems--alarms, lightning protection. Lodges stabilized to date were built in the late nineteenth century, including the Second French Empire design with the iconic mansard roof.

The lodges were mothballed consistent with *Preservation Brief 31: Mothballing Historic Buildings*. Corresponding historic structure treatment reports are due to NCA before the end of calendar year 2014.

The lodges treated during this project are located in Virginia at Winchester National Cemetery, Staunton National Cemetery, and Seven Pines National Cemetery; at Keokuk National Cemetery, IA; and Loudon Park National Cemetery, MD, where a new "temporary" asphalt roof was required. Section 106 consultation for all mothball work resulted in a No Adverse Effect concurrence.

NCA is currently evaluating if it should continue stabilizing its remaining vacant lodges due to negative changes to the interiors, post-mothball treatment, that is associated with pre-existing system failures. Monitoring is necessary for the timely identification of deteriorating conditions at mothballed buildings. In fiscal year 2014 other historic lodges that were until recently occupied, have been vacated when leases ended and when cemetery operations were transferred to another location. Plans and work on lodges include:

- Annapolis National Cemetery, MD, during winter 2013-14 water pipes froze and caused serious water damage to the 1940 lodge. NCA has not determined whether to mothball or rehabilitate.
- Fort Leavenworth National Cemetery, KS, will be rehabilitated over two years, NCA staff will reoccupy it.
- Nashville National Cemetery, TN, will be rehabilitated and expanded to house NCA staff.

- Alexandria National Cemetery, VA, is being rehabilitated and will be complete in 2014; occupant TBD.

Several of NCA's most significant "Second French Empire" lodges remain or recently became vacant, are not mothballed, and lack identified plans for use include those located in the following national cemeteries: Beverly NJ (1879); Cold Harbor (1870), Culpeper (1872), and Richmond (1870), VA.; Jefferson City, MO (1870); and Port Hudson, LA (1879). Several of NCA's second-generation lodges, built 1920s-1930s, are vacant and lack identified users at the following cemeteries: City Point, VA (1928); Marietta, GA (1921); and Corinth, MS (1934).



Figure 9. The 1886 lodge at Loudon National Cemetery, ca. 1900 and after being mothballed in fiscal year 2012.



Figure 10. Nashville National Cemetery, lodge built 1934, will be rehabilitated and reoccupied by NCA; a modern building that does not contribute to the historic district will be razed.



Figure 11. Richmond National Cemetery, 1870, the first lodge designed with the iconic mansard roof; later and final designs have a revised roof line.

Structures

The memorial ceremonies at national cemeteries are often focused on rostrums, raised platforms that were built between the 1880s and 1940s as small, free-standing or structures or they are imbedded into enclosure walls. This structure is typically utilized for Memorial Day programs. Over the years, many nineteenth century rostrums have been altered by the removal of roofs or trellis, but this feature could easily be restored based on existing documentation. Occasional open plazas built as “rostrum areas” were short-lived features before the Army ceased to build them in the 1940s. NCA oversees 36 rostrums today.

A complete condition assessment of NCA rostrums was completed in fiscal years 2012-14 through the FCA inspection. Each rostrum receives multiple grades to reflect the structure’s state of repair and compliance with building codes. Of 5,628 rostrum elements, 111 are below-average (99 graded “D”) or failing to meet code (12 graded ‘F’). These below-average and failing elements are spread across all 36 rostrums.

The majority below-average and failing elements consist of minor construction repairs or one-time maintenance. For instance, several ‘D’ ratings refer to a damaged or broken decorative feature or omission of signage depicting the building number. Many rostrums require cleaning to remove biogrowth. Others require repointing or repainting wooden portions.

The failing grades generally refer to features that would make the rostrum compliant with the Rehabilitation Act of 1973; however, it is likely that alterations to meet that standard would also adversely affect the character and integrity of these structures.

Some rostrums need substantial treatment. Raleigh National Cemetery requires a risk analysis on the lighting. New Bern's octagonal base and iron stairs have been partially obscured as the result of raising the grade and cemetery turf many years ago. Marble on the back of the Alexandria, VA., dais hosts orange biogrowth that has been found on other Washington, DC-area memorials and is difficult to eradicate. The Fort Scott National Cemetery brick base is unstable and requires complete reconstruction. However, of the 111 elements scoring poorly, structurally compromised or risky features are few.



Figure 8. Two eras of national cemetery rostrums: New Bern, ca.1890 (left), and Alexandria, VA., 1945.

The previous triennial report included information about a project at San Francisco National Cemetery that benefited NCA's historic fence and gates. The lead agency, California Department of Transportation (CALTRANS), was required to mitigate impacts to NCA's property as the result of widening Doyle Drive at the foot of the cemetery. CALTRANS oversaw the comprehensive restoration of a ca. 1880s cast-iron gate and rehabilitation of the connecting fence, including replicating a medallion that was missing from the gate. This project has concluded with outstanding results.



Figure 9. Original entrance gates, 1880s, at San Francisco National Cemetery: during studio restoration, showing the medallion replicated from NCA collection; and reinstallation in 2013. Photo credit: CALTRANS.

Two NCA projects underway during the past three years involve memorial objects donated to national cemeteries that contain artifacts historically associated with veteran service; these artifacts, rescued from oblivion by veteran groups, are or will be incorporated into new commemorative monuments. Section 106 consultation was completed on both with No Adverse Effect findings:

- Jefferson Barracks National Cemetery, MO - St. Louis World War I Monument.

Inspiration for this commemorative work were 752 bronze medallions (of 1,185) created by the National Society of the 1917 World War Registrars and the St. Louis Gold Star Mothers organization. Installed as part of Kingshighway Memorial Drive starting in the 1920s, the medallions are inscribed with the names, rank, outfit, cause of death and branch of service of the person being memorialized from the St. Louis area; they were installed along with memorial trees. Beginning in the 1960s, the medallions were removed to make way for new transportation projects. NCA was approached by the Jefferson Barracks Memorial Chapel Association and the Rollo Calcaterra American Legion Post 15 about using the medallions as part of a “new” monument, which was dedicated in 2012.

- Great Lakes National Cemetery, MI - Henry Ford Trade School World War II Alumni Monument. The Henry Ford Trade School was founded 1916 by its namesake industrialist. A bronze bas relief plaque installed on school grounds in 1946 honored 68 graduates killed in World War II. The school closed in 1952 and since then the plaque traveled to events sponsored by the Henry Ford

Alumni Association. The plaque will be mounted on a granite base and installed along the cemeteries' memorial walkway in the next year.



Figure 14. St. Louis World War I Monument, installed 2012, includes hundreds of metal Gold Star medallions originally installed along a memorial boulevard in the 1920s, detail and general view.

Objects

Monument Conservation. NCA previously contracted with Heritage Preservation, Inc., to coordinate a two-year assessment of approximately 160 monuments. Detailed assessments were delivered in fiscal years 2010-11. Based on this work, NCA first contracted for the repair and treatment of about 80 historic monuments in its cemeteries by qualified conservators. All work commenced in fiscal year 2009 and was largely completed in fiscal year 2011. American Recovery and Reinvestment Act of 2009 funding of nearly \$2.6 million was spent on some of this work, on 49 monuments.

Continuing its conservation campaign for its most significant monuments, in October 2012 NCA contracted with Conservation Solutions, Inc., for the repair and conservation of the final assessed monuments, 72; the contract will conclude in July-August 2014. Section 106 consultation for treatments resulted in No Adverse Effect concurrences. Examples of work done in the past three years include:

- Springfield National Cemetery, Missouri: Gen. Nathaniel Lyon (1884); Missouri Confederate Soldier/Maj. Gen. Sterling Price (1901), Union (1907) monuments.
- Barrancas National Cemetery, Florida: U.S. Marine Guard (1884) Monument.

- San Francisco National Cemetery (four monuments): Grand Army of the Republic (1892), Sacramento Pullman Strike (1895), Pvt. Thomas Thompson grave marker (1899), Unknown Dead (1934).
- Winchester National Cemetery (fourteen monuments): 14th New Hampshire (1866), 38th Massachusetts Volunteers (1884), 3rd Massachusetts Cavalry (1888), 8th Regiment Vermont Infantry and 8th Vermont Volunteers (ca. 1888), 13th Regiment Connecticut Volunteers (ca. 1890s), 6th Army Corps (1891), 18th Connecticut Volunteer Regiment (1895), 12th Regiment Connecticut Volunteers (1896), 114th New York (1898), 123rd Regiment Ohio Volunteer Infantry (1899), Massachusetts Monument (1907), Pennsylvania Monument (1908), 34th Massachusetts Infantry (1912).



Figure 10. Treatment of Pvt. Thompson's grave marker, CA, and the Confederate Monument at Springfield, MO.

Monument-Care Training Course. In the wake of so many monument treatments, the NCA History Program oversaw the creation of a pilot Monument/Memorial Care training course that was held June 20-21, 2012. It was designed to introduce NCA field personnel to the special maintenance needs of these historic objects, many of which have recently been conserved or treated. Topics included cyclical and emergency procedures, inspections, cleaning, waxing, temporary repointing and graffiti removal; training was delivered through two days of classroom presentations and hands-on demonstrations at Winchester National Cemetery, VA. At the end of the course, staff could identify material failures on historic monuments/memorials and undertake appropriate corrective treatment. Twelve persons participated. This training was envisioned to be repeated periodically in coming years, but as yet it has not been repeated. NCA will be posting the written guidance on its intranet website to make the information available to NCA personnel as needed.



Figure 116. Monument-care training in the field, June 2012.

NCA History Collection. The History Program maintains a physical collection in a single, secured room at its 425 I Street offices in Washington, DC. The collection contains paper records (reports, memos, publications, and drawings), photographs and artifacts (headstones, metal flag holders and signs). During the past three years activity to protect historic resources includes:

- Acquisition of new artifacts that include significant headstones, photographs and paper records;
- Cataloging of photograph collection; and
- Organization and re-housing of collection on site.

In addition to a physical collection, a growing number of research resources and documentation is in an electronic format. Since the last triennial report, NCA has identified in excess of 100 DVDs containing high-resolution primary source documentation that it needs to protect by automatic backup on an electronic system. The History Program has endeavored for several years to access sufficient electronic storage, an estimated 2.9 TB,; it is slated to be provided in fiscal 2014. The following digital records are representative:

- Video including: *American Veteran* final programs, *American Veteran* unedited footage, NCA Civil War 150th commemoration recorded presentations
- Photographs of all headstones in Togus (West) National Cemetery

- Scanned hand-written burial ledgers, sexton reports, and Army Cemetery Files/Maintenance Ledgers

Headstones/Markers/Memorial Walls

In 2011, NCA's regulations about who qualifies to request headstones changed, and it inadvertently impacted the administration's ability to mark unmarked graves and replace unserviceable headstones—in particular the graves of Veterans from the Civil War and pre-World War II service. NCA is addressing how to remedy this .

NCA is challenged by requests for new or replacement headstones to mark the graves of Union and Confederate troops, sometimes when the graves are marked in a fashion appropriate to the historic period, but in a manner that is interpreted as insufficient based on current standards. For example, a group monument may not feature individual names and regimental information. One case demonstrates the friction created between meeting current NCA regulations without imposing new potentially adverse impacts to historic properties through the undertaking of headstone provision.

- Charlottesville Confederate Cemetery, Individual Headstones denied. At the University of Virginia's Confederate Cemetery in Charlottesville, soldiers who perished are recognized on the Confederate Soldiers Monument, 1893. It consists of 12-foot-high pedestal on which stands an 8-foot-tall bronze statue of a young Confederate soldier. Four bronze tablets are inscribed with the names of the fallen who are buried at the cemetery; seventeen blank spaces represent unknowns.

In 2012-13, NCA began denying requests for individual headstones to mark the graves, as the Administration finds the graves are already marked by the group memorial privately provided by the Ladies' Confederate Memorial Association, a forerunner of the Albemarle Chapter No. 1, #154, United Daughters of the Confederacy. The graves were not originally marked individually. NCA cannot, by law, provide a second marker for someone who died before 1990: furthermore the provision of this quantity of headstones would pose a potential Adverse Effect to a cemetery landscape that is eligible for listing on the NRHP. The monument honors men who came from Mississippi, North Carolina, South Carolina, Virginia, Florida, Tennessee, Texas, and elsewhere.

- Jefferson Barracks National Cemetery, 56th U.S. Colored Troops Grave Marker. A total of 178 men of the 56th U.S. Colored Troops (USCT) are buried in Section 57 (in three graves). When they died of cholera in August and September 1866, approximately 125 were originally buried in at a cemetery affiliated with Koch Hospital, St. Louis. In 1939, a citizens' commission approached the U.S. Army about moving these remains to the national cemetery along with a sandstone obelisk that marked the graves. Remains were removed from nine trenches and placed in several metal boxes for relocation. At Jefferson Barracks, the obelisk was placed on a new base with a bronze plaque that included a rededication inscription. The graves have never been marked individually, and names have never been inscribed on a marker(s).

In 2012 a group approached NCA about providing six bronze plaques inscribed with the names of the fallen to supplement the original group grave marker in Jefferson Barracks National Cemetery. NCA is considering alternatives in concert with the applicants to minimize any potential Adverse Effects to the historic cemetery1930's landscape.



Figure17. 56th USCT Monument relocated to Jefferson Barracks National Cemetery in 1939.

NCA's State and Tribal Veteran Grants (VCGP) Program provides grants to states and tribal governments. 38 CFR 39.31c(4) requires that State or tribal organization applicants assist VA in complying with Section 106 of NHPA and other environmental requirements.,

In fiscal year 2012, the program awarded eighteen grants totaling \$47.46 million; in fiscal year 2013, eighteen grants totaling \$36 million; and in fiscal year 2014 thus far, six grants totaling \$10.27 million. The program does not fund projects where consultation results in anything but a No Adverse Effect finding. In fiscal year 2012 and this triennial reporting period, the VCGP program awarded grant funds to two cemeteries that are older than 50 years: Kauai Veterans Cemetery in Lihue, HI, and Ohio Veterans Home Cemetery in Sandusky:

- The Ohio Veterans Home Cemetery, established 1888 in Sandusky, received operations and maintenance funds in the amount of \$798,987 from NCA. The property contains approximately 4,200 graves on approximately 13 acres; it is a designated historic district. The SHPO concurred with NCA that the headstone raise, realign, clean and surface renovation project would not have an adverse effect.
- The Kauai Veterans Cemetery in Lihue, HI, established in 1945, received improvement funds in the amount of \$1.29 million from NCA. The property contains approximately 2,110 graves on approximately 11 acres; it is a designated historic district.



Figure 18. Ohio Veterans Home Cemetery, graves before (left) and after headstone and turf improvements.

Landscape

NCA is involved with two consultations for proposed highway expansion or alignment projects:

- Wood National Cemetery, WI. The VA property is a designated National Historic Landmark. Starting in mid-2012, Wisconsin's Department of Transportation

(DOT) proposed that Interstate 94 be widened, which has the potential adverse effect on some aspect of Wood National Cemetery. I-94 divides Wood National Cemetery into two sections, a small northern section and the majority of the cemetery on the southern section. In the past there have been discussions on rebuilding/ expanding the freeway that could have an impact on the cemetery that has the potential to be an Adverse Effect.

- Hampton National Cemetery, VA. The VA property is listed on the NHRA and contains a designated National Historic Landmark tree. Interstate 64 bisects the Hampton VAMC campus. Starting in July 2013, Virginia's DOT proposed that this highway be widened, which would have an adverse effect on some aspect of the VA property.

Artificial Turf

Maintaining attractive turf in high-traffic and high-visibility locations of national cemeteries is expensive in terms of water usage and labor. NCA recently began testing the use of artificial turf in some areas of national cemeteries in order to provide improved year-round grounds appearance achieving national shrine appearance, elimination of potential wet/soggy/muddy ground conditions at ceremonial lawn areas where large public gatherings occur, elimination of costly and perpetual grounds maintenance including mowing, trimming, aerating, fertilizing, irrigating; reduces water usage.

NCA has initially tested artificial turf at several California national cemeteries, among them Fort Rosecrans in San Diego, San Joaquin Valley in Santa Nella, and Riverside. It is now being incorporated into ceremonial areas of the new national cemeteries at Cape Canaveral and Tallahassee, FL.

Section 106 Consultation

Section 106 consultation on NCA's historic resources—buildings, structures, objects and landscapes--in the past three years consisted of a range of undertakings. Consultation was not undertaken for all projects undertaken at all cemeteries. This work utilized NCA funding overseen by VA Central Office: Minor Construction, less than \$10 million per project; Millennium or National Shrine Commitment, almost exclusively headstone raise-and-realign and turf improvement; and the History Program's monument conservation and Section 110 documentation. The five

regional Memorial Service Network offices spend a total of \$800,000 each annually, using Non-Recurring Maintenance and Mini-Minor Project sources. Examples of NCA undertakings during this triennial period are provided below; more information about some of them are found elsewhere in this report:

Year	Cemetery	State	BUILDINGS: Undertaking/Finding
2014	Jefferson Barracks	MO	SHPO concurs with replacing non-historic deteriorated windows in Maintenance Building with new ones that match original material and proportions.
2014	Golden Gate	CA	SHPO concurrence to install a thru-wall Grave Locator kiosk in historic office building.
2014	Los Angeles	CA	Consultation underway; SHPO/THPO to review proposal to raze historic maintenance building.
2013	Fort Harrison	VA	SHPO concurs with NCA project for partial re-roof of lodge and chimney repair.
2013	Baltimore	MD	SHPO concurs with project to repair, abate lead paint; part of mothball treatment.
2013	Loudon Park	MD	SHPO concurs with project to temporarily re-roof lodge with non-historic material, abate lead paint; part of mothball treatment.
2013	Glendale	VA	SHPO concurs with project for partial re-roof of lodge.
2013	Memphis	TN	NCA, SHPO, ACHP agreed demolition of a 1934 NRHP-listed lodge was an Adverse Effect; documentation and rehabilitation of the Nashville lodge, the last in the TN, were mitigation stipulations.

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Year	Cemetery	State	STRUCTURES: Undertaking/Finding
2014	12 cemeteries	Various	SHPOs concurred with projects to correct failed mortar/stucco on enclosure walls. Planning for some projects began in the previous reporting period; many projects are underway and will

Year	Cemetery	State	STRUCTURES: Undertaking/Finding
			finish prior to FY2014.
2013	Marietta	GA	SHPO concurred with NCA project to correct failed mortar in enclosure wall. Work is complete.
2013	Camp Nelson	KY	SHPO concurred with project to build a columbarium outside, but in view shed of, historic burial sections. SHPO felt a 2010 pre-placed crypts NCA project exceeded original scope and negatively altered the cemetery cultural landscape. NCA noted concern, committed to discuss project activity better.
2013	Golden Gate	CA	SHPO approved NCA project to replace deteriorated gate hardware with new materials that match the original profile and dimensions.
2012	Santa Fe	NM	SHPO concurred with wall/drainage improvements, but cautioned that NCA contractors were not qualified to prepare historic preservation consultation. NCA History Program staff provided the data which led to consultation approval.

Year	Cemetery	State	OBJECTS: Undertaking/Finding
2013	9 cemeteries	Various	Cemeteries installed replica Gettysburg Address plaques; the 2009 production was reported three years ago. SHPOs concurred on locations.
2013	Great Lakes	MI	SHPO concurred with a proposal that NCA accept a donated monument that reuses a memorial plaque honoring Henry Ford Trade School alumni who died in World War II.
2012	Various	Various	Conservation of 79 historic monuments; no adverse effect for all.
2012	Jefferson Barracks	MO	Installation of St. Louis World War I Monument on Memorial Walkway, not an adverse effect.

Year	Cemetery	State	SITE: Undertaking/Finding
2014	Prescott	AZ	SHPO concurred on removal/replacement of a non-historic rostrum, allee of diseased trees. Consultation occurred after project was underway.
2014	Beverly	NJ	SHPO concurred with NCA to restore historic fencing using more compatible materials
2014	Wood	WI	After success of a pilot project, SHPO agreed to headstone raise-and-realign project
2013	Sitka	AK	SHPO concurred with NCA plans to reduce the amount of paving, relocation of flag pole at hilltop ceremonial area.
2013	Black Hills	SD	NCA's project to install pre-placed crypts and columbarium received SHPO approval.
2013	Hampton	VA	SHPO concurred with NCA plan to maintain asphalt roads, replace deteriorated sidewalks,
2012	Keokuk	IA	SHPO concurred to raise and realign headstones in a pilot project

Year	Cemetery	State	NEW CONSTRUCTION: Undertaking/Finding
2014	Fort Sam Houston	TX	Ongoing Major project (\$10> million) altering historic section of cemetery required new MOA (through 2018) after first one expired with outstanding stipulations. Monitoring reports for 2011-13 were submitted to SHPO as required; mitigation documentation is in draft.
2013	Washington Crossing	PA	Ongoing compliance per a 2009 Programmatic Agreement stipulates NCA may construct a new cemetery where three historic farmsteads exist; stipulations to preserve or remove these

			are outstanding, monitoring continues.
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What other forms of protection has your agency provided for historic properties?

Education is essential to promote the protection of historic resources. To commemorate the sesquicentennial anniversary of the Civil War and its origins in that conflict (1861-65), starting in 2012 NCA has hosted a series of occasional lectures by scholars and subject matter experts at its headquarters building.

Lectures have included the partnership with Ancestry.com to digitize NCA's burial records and to make them publically accessible, scholarship presented by historians who have researched Native American and African American military service; the story of the *USS Monitor* and recovery of two remains from the turret; and a talk by Harvard University President and Professor Drew Gilpin Faust on how the Civil War changed the American social perception of death. Events slated for the rest of fiscal year 2014 include a tour of historic Alexandria National Cemetery, VA., to trace the cemeteries' Civil War beginnings, notable interments, changes at the cemetery and its appearance today. This educational series will continue to the anniversary of the end of the war, the surrender at Appomattox in April 2015.



Figure 19. Representative Civil War 150th Programs.

Describe the programs and procedures your agency has established to ensure the protection of historic properties, including compliance with Sections 106, 110 and 111.

How does your agency oversee compliance with Sections 106, 110, and 111 of NHPA?

Section 106 is the responsibility of NCA's Design & Construction Service, which in early 2014 hired an historical architect who meets the Secretary of the interior's standards for historic preservation. This position will coordinate NCA Section 106 consultation, produced personally or by contractors.

In 2013 NCA identified an individual in each of its Memorial Service Network (MSN) offices to serve as a Cultural Resource Management Officer (CRMO), per VA 7545 Cultural Resource Management. CRMOs at each of the five MSNs will track and monitor consultation within each region. Training to meet the Secretary of Interior's standards is ongoing.

Section 110 is the responsibility of NCA's History Program, which is composed of a senior historian and two staff historians. All three meet the Secretary of the Interior's professional qualifications for historic preservation.

- A draft History Program directive has been underway for several years to codify the activities and roles that historians undertake to support Section 110 documentation. NCA historians are responsible for projects personally or serve as Contracting Officer Representatives on projects that are contracted out. This office also advises the Design & Construction Service on Section 106 matters, as needed.
- Each year, incoming cemetery-director interns receive two days of history/historic preservation training (classroom, fieldwork) as part of the curriculum.
- In 2014 a new Outreach & Communication vehicle was outfitted with exhibits; half of the exhibits illustrate the history of NCA and its burial benefit products.
- In 2013, oversized interpretive "artwork" was hung in the VA/NCA headquarters; all 12 panels illustrate historic properties and NCA's Civil War origins.



Figure 20. Example of canvas “interpretive” panels hung in VA/NCA headquarters.

To date, Section 111 has not been pursued by the Administration. NCA currently lacks a staff resources to promote leasing of its historic lodges.

Has your agency dedicated adequate resources to oversee these provisions?

NCA has the funding and the staffing to maintain and improve Section 106, 110 and 111 accountability. However, to fully achieve these provisions, the Under Secretary for Memorial Affairs would need to heed the first recommendation contained in the National Trust for Historic Preservation’s report *Honoring Our Nation’s Veterans: Saving Their Places of Health Care and Healing*, released in fall 2013. The report criticizes the Veterans Health Administration for its lax approach to historic preservation in many areas:³

“Recommendation One: The Secretary of the VA should issue a management statement that commits the VA to fulfilling its responsibilities under the National Historic Preservation Act and the VA’s Sustainable Locations Program policy. The management statement should commit the VA to an accurate inventory of its historic buildings; early initiation of, and full compliance with, historic preservation

³ National Trust for Historic Preservation, *Honoring Our Nation’s Veterans: Saving Their Places of Health Care and Healing*, 2013, p. 48.

and environmental review requirements; continued hiring of qualified preservation professionals and training of technical staff; and internal compliance audits.”

Specifically, improvement of NCA historic preservation responsibility and accountability would require clearer communication among services, education of staff in all office levels, and recognition of historic preservation sensitivities and requirements and that these can be realized concurrent to NCA’s core mission. This level of “heritage vigilance” would require rigorous advance preservation planning and adequate funding to assure that contracts are awarded in a timely fashion to address unique demands of aging historic infrastructure and conservation of historic landscapes and implementation by qualified designers and construction contractors.

It would be practical and beneficial to identify funding to target backlog and recurring maintenance of NCA’s most significant historic resources within established categories: Major, Minor, Mini-Minor, Non-Recurring Maintenance, and Millennium projects. Historic-resource subject-matter staff and stakeholders should be invited to work with lead NCA offices—Budget, Design & Construction Service and MSNs—to help prioritize projects based on historic significance, FCA grades, and functionality along with the ubiquitous “operational need” justification. Policies should be developed to specify how an historic lodge will be treated, monitored and repurposed when it is abandoned as part of a burial-expansion project elsewhere. Qualified contractors who meet the Secretary of the Interior’s standards should be included on IDIQ and other contracts when deliverables include condition assessments, rehabilitation, repairs or conservation of historic resources, as appropriate. Sole-source contracts may be needed to reach niche disciplines in a timely fashion when set aside vendors are not qualified, in order for NCA to be a good steward of its historic resources.

Does your agency use program alternatives such as Programmatic Agreements, Program Comments, and other tools to tailor the Section 106 process to your agencies programs and activities?

No. However, the new NCA historical architect will be developing program alternatives with the SHPOs and ACHP to streamline the 106 process.

If not, are there specific activities or programs that you believe would benefit from treatment under a program alternative?

Yes. Recurring maintenance; headstone raise & realign, cleaning, second inscriptions; mowing/trimming grass, trimming trees; acceptance of new standard monuments.

Does staff in your agency have access to training on Section 106, 110 and 111? If not, what are the impediments to accessing or participating in training?

NCA has funding to send employees to training appropriate to their responsibilities. In May 2013, NCA identified an individual in each of its Memorial Service Network offices to serve as a Cultural Resource Management Officer (CRMO), per VA 7545 Cultural Resource Management. CRMOs are slated to take appropriate training in Section 106, however that has not occurred. The VA Federal Preservation Office has committed to provide basic training to NCA staff, as well.

Otherwise, cemetery personnel are not tasked with Section 106 responsibilities. However, as of fiscal year 2013 cemetery directors are responsible for making annual inspections of monuments that have been previously treated by professional conservators, and report conditions to the History Program.

Is your agency considering procedures and policy related to compliance with Sections 106, 110 and 111 of NHPA when evaluating regulatory review under Executive Order 13563, "Improving Regulation and Regulatory Review" (E.O. 13563)?

The new NCA historical architect has drafted new proposed policy that will soon be reviewed. If approved, it would be disseminated throughout NCA outlining the process for Section 106 review. A checklist has been developed to assist cemeteries and MSNs in submitting projects for review and concurrence by state and tribal historic preservation offices.

Describe your agency policies that promote and/or influence the protection of historic properties. How is this policy incorporated into your agency's strategic plan?

NCA's Strategic Plan (2011-2015), Goal 3, states that we will "ensure that VA's national cemeteries and State and Tribal Government Veterans cemeteries are maintained as national shrines dedicated to preserving our Nation's history,

nurturing patriotism, and honoring the service and sacrifice Veterans have made.” Objective 3.B, in support of that goal, states that NCA will “ensure that a comprehensive and professional historical record of NCA exists for future generations.” Under that objective, NCA will write the first volume of a comprehensive historical analysis of NCA or its predecessor agencies from its inception and locate, design, fund, and establish a long-term archival storage facility with standard environmental controls. Both of these strategies require additional staff to accomplish.

The fiscal year 2011–2015 NCA Strategic Plan sets forth NCA’s five-year strategic plan:

“NCA must also consider other groups of interested and concerned citizens, as well as members of the general public as stakeholders. Many of our national cemeteries date from the Nation’s Civil War and are listed on the National Register of Historic Places. As such, they are of interest to historical societies and individuals interested in U.S. and landscape history and genealogical research.

All VA national cemeteries are valuable historic assets of our Nation and important sites for patriotic and commemorative events. NCA needs to continue to emphasize the use of VA’s national cemeteries and nineteenth-century soldiers’ lots to teach American history to students and communities, with a special emphasis on Veterans and their role in the history of our Nation.”⁴

In 2009 NCA introduced a new product, a memorial wall. The policy that indicates where to use the memorial wall considers the historic status of the property: “A memorial wall feature will not be placed within the original grounds of historic cemeteries. However, if a historic cemetery is being expanded with the addition of new land, the addition of a memorial wall in the new expansion area will be evaluated against the factors in paragraph three.” Paragraph three requires that the wall avoid the “creation of a negative impact on historic resources.”⁵

Does your agency have an asset management plan? What planning and management requirements do historic real properties have in your agency’s asset management plan?

⁴ NCA Strategic Plan FY 2011–2015, p. 6-7.

⁵ Memorandum, “Memorial Walls in Department of Veterans Affairs National Cemeteries,” April 13, 2009.

NCA's asset management plan is formulated in accordance with the VA Strategic Capital Investment Program (SCIP) Process. Records of the existence and condition of all capital assets including historical assets are maintained in the Capital Asset Inventory (CAI) database. Assets with conditions requiring repair or replacement or any type of construction project are identified within the Memorial Service Networks (MSN) and submitted as maintenance and repair or non-recurring maintenance projects or are submitted in the SCIP process as Minor or Major construction projects.

All projects compete for budgetary funding according to their rating based on SCIP criteria, which include: Improving Safety and Security, Fixing What We Have (Making the Most of Current Infrastructure/Extending Useful Life), Increasing Access, Right Sizing Inventory, Ensuring Value of Investment, and compliance with Departmental initiatives. Projects are scored based on how they address identified gaps in, primarily: safety and security, access, utilization, condition and space.

SCIP does not feature any criteria aimed to recognize the value of an NCA historic or heritage asset, or to elevate such resources to a competitive rank in this overall funding process.

Has your agency entered into any management contracts with other parties to protect your historic properties, including monitoring, repair, stabilization, and rehabilitation? If yes, have these been effective? What are the advantages and disadvantages of these contracts?

During the past three years NCA historians have worked with the National Park Service, Historic Preservation Training Center (HPTC), through an interagency agreement, to mothball several historic lodges. The advantage has been in saving time and accessing demonstrated expertise with historic structures. NPS is responsible for several identical national cemetery buildings; as part of HPTC's mission, they provide training, and would do so to NCA staff if we were inclined to participate. The cost for mothball work is reasonable; their schedules can be flexible but they are much in demand.

An Interagency Agreement (IAA) between NCA's Design & Construction Office and HPTC, which concluded in the past three years, was less successful. The project included structural stabilization and repointing of a historic brick perimeter wall.

Work on the Raleigh National Cemetery wall was performed by HPTC staff, which allowed for a hands-on training component. However, only 75 percent of the project was complete when funding was depleted. In this case, it is unclear if either party can be held at fault, but the two agencies are working to rectify the situation. Normal contracting procedures would allow NCA to hold the contractor accountable for the unfinished work. A lesson learned here is that outcomes are heavily dependent upon the quality of the agreement, spending and inspection documentation, and the diligence of project managers.



Figure 21. Raleigh National Cemetery wall, 2014.

If federal offices with qualified personnel who meet technical historic preservation requirements are available, and the cost is competitive, it is NCA's experience that an interagency agreement is a more straightforward contract vehicle to use to reach these specialists. VA's priority contracting goals emphasize hiring service-disabled veteran-owned businesses or veteran-owned businesses; however, NCA far exceeds the percentage goal set by VA to utilize this business sector. Based on NCA contracting efforts of the past five years, very few set-aside businesses have been able to demonstrate the appropriate personnel or experience necessary to meet the Secretary of the Interior's Standards for historic preservation (i.e., historical architects, historians, conservators, historic masons). To document that set-aside companies are not qualified to bid on NCA historic-resource projects takes a substantial amount of lead time; frequently there is inadequate time during the last half of the fiscal year to demonstrate this and be able to award the funds.

What types of performance criteria must be met in the stewardship and capital planning for the use of historic properties?

Organizational Assessment and Improvement Program. NCA's Organizational Assessment and Improvement (OAI) Program is part of the Deputy Under Secretary for Finance and Planning/CFO's Internal Controls program to support high standards

of operation and administration of all NCA offices and components. The OAI Program for national cemeteries contains standards for the stewardship of historic assets. Standards set requirements and expectations for accurate inventories, proper Section 106 consultation and documentation for undertakings, and the identification and documentation of donations, objects and collections of items of historic significance.

Cemetery directors are expected to self-report on their adherence to these standards as part of their annual self-assessment as submitted to their MSN. In addition, independent teams of NCA employees acting as OAI Site Visit Teams periodically visit each national cemetery for the purpose of reviewing and validating required data collection and results. Site visit findings are documented in a report that is distributed to leadership, including the MSN Executive Director, the Director of Field Programs, the Deputy Under Secretary for Field Programs and the Under Secretary for Memorial Affairs.

Contracting. Per Section 112, NRHP, NCA requests for proposals (RFP) and scopes of work (SOWs) for projects with the potential to effect historic resources should include mandatory relevant professional qualifications (training, education) and demonstrated professional experience in recent years on resources of the same age, type, materials, etc. NCA incorporates this language in historic-monument assessment and conservation projects, studies, and some construction projects. NCA's Indefinite-Delivery Indefinite-Quantity contracts (IDIQ) for planning activities currently do not include specific historic preservation disciplines such as historical architect, conservator, historic mason, etc.--as standard disciplines. VA has made hiring service-disabled veteran-owned businesses or veteran-owned businesses a priority. However, experience of the past five years suggests that very few of these set-aside businesses demonstrate the appropriate personnel or experience necessary to meet the Secretary of the Interior's Standards.

Existing NCA SOWs include language that all NCA cemeteries are considered historic. Typically NCA has delegated historic-compliance preparation to its contractors. This excerpt from a current project serves as an example:

"Fort Rosecrans National Cemetery is eligible for listing in the National Register of Historic Places, and is subject to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended). The A/E shall prepare a SHPO notification of intent without adverse action for VA to send to the California SHPO. The A/E shall be responsible for coordinating all historic reviews and compliance required by the State Historic Preservation Officer (SHPO). VA will

review and approve all material prepared on the department's behalf for submission to state agencies."

For future projects, NCA's staff historical architect will endeavor to clarify historic preservation technical requirements early on. During the RFP phase, for example, NCA will require potential contractors in bidding on projects to present examples of completed projects that demonstrate their ability to perform restoration, stabilization and renovation of complex preservation projects, and demonstrate that their work meets the Secretary of the Interior's Standards. The U.S. Army Corps of Engineers uses a similar vetting process when renovating historic structures. A Source Selection Committee reviews submissions and recommends the best qualified contractor for preservation projects. NCA should develop a similar review to ensure that work undertaken on historic structures, objects and sites is done by competent and qualified contractors well versed in preservation methods and techniques.

Does your agency utilize a deferred maintenance program for protection of historic properties?

The deferred maintenance program applies to all properties, including historic properties

Explain how your agency has employed the use of partnerships to assist in the protection of historic properties. Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the protection of historic properties?

In the past three years, partnerships intended to rehabilitate and occupy two historic NCA buildings have failed:

- Keokuk National Cemetery, IA, lodge. The 1871 lodge at Keokuk National Cemetery was to be renovated by the Keokuk Historic Preservation Commission (KHPC) through a Revocable License for Non-Federal Use of Real Property agreement. The 20-year agreement, signed in 1999, was to see the building turned into a welcome center and museum/war memorial using state grant funds. The partner gutted the building down to its studs, work ceased in 2010, and in May 2012 NCA revoked the license in advance of having the building mothballed by the NPS. Due to the problematic financial situation, NCA had to waive the

requirement that licensee “restore the property to substantially the same condition as those existing at the time.”



Figure 12. Keokuk National Cemetery lodge during mothball treatment--interior and exterior,

- Wood National Cemetery, WI, “Roundhouse.” In 2010 NCA signed a 10-year lease agreement with the Soldier Home Foundation; this group would renovate and use the “Roundhouse.” The small octagonal building, erected ca. 1929, was to be used as a reception space. Although consultation with the SHPO appears to have been initiated by the foundation, to date no work has occurred and the condition of the building has deteriorated.



Figure 13. "Roundhouse," Wood National Cemetery, 2007, and detail showing failed eave, 2014.

How have partnerships benefited your agency? How successful has your agency been in developing partnership agreements (e.g. cooperative, cost-share, interagency, research) for the protection of historic properties?

During the past three years NCA historians have worked with the National Park Service, Historic Preservation Training Center (HPTC), through an interagency agreement, to mothball several historic lodges. The advantage has been in saving time and accessing demonstrated expertise with historic structures. NPS is responsible for several identical buildings, and they would provide training to NCA staff as the work occurs, if Administration was inclined. The cost for mothball work is reasonable; their schedules can be flexible but they are much in demand. However, an interagency agreement between NCA's Design & Construction Office and HPTC, which concluded in the past three years, was less successful. While work on the completed historic wall at Raleigh National Cemetery was considered outstanding craftsmanship, work was left incomplete when funding was depleted. Outcomes are heavily dependent upon the quality of the agreement, spending and inspection documentation, and the diligence of project managers.

During the past three years NCA historians have worked with the National Park Service, Historic American Buildings Survey (HABS) through an interagency agreement, to document all of its historic lodges and rostrums. This was an exciting project that resulted in primary research and other documentation for these essential resources.

Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in protect historic properties over the past three years and in recognition of the 50th anniversary of NHPA.

Challenges

NCA has been challenged for many years by the need to re-purpose its historic lodges in locations where they do not meet operational needs. The lodge at Memphis National Cemetery was razed in 2013 for this reason.⁶ Many Civil War-era cemeteries now closed to burials contain lodges that were once home and office to cemetery superintendents. NCA staff is no longer required on site, and turf care and headstone/marker cleaning is increasingly accomplished by contractors. Underutilized, unoccupied, or mothballed cemetery lodges are not routinely monitored or inspected to verify conditions. Funds are not allocated for rehabilitation because tenants or leasing agreements are not a priority. More historic lodges are vacant now than in previous years.

⁶ Advisory Council on Historic Preservation (Blusher), "Ongoing Case: Memphis (TN) National Cemetery Building Upgrades," in *Case Digest: Section 106 in Action* (Spring 2012); p.17. Found at: <http://www.achp.gov/casedigest.html>.

Within the past three years, NCA is faced with a new challenge as it aims to be a steward of its historic buildings concurrent to meeting the goal of VA's "Freeze the Footprint" policy concurrent to developing ten new cemetery properties. The VA system for planning and budgeting for projects (SCIP) is an impediment to historic preservation goals, including reuse. NCA's vacant historic properties do not receive timely inspections and routine maintenance. When funds are available, specialized skills necessary to maintain the materials of historic properties are not easily or typically met, including the Secretary of the Interior's Standards. VA's current emphasis on competitive-procurement goals results in delayed contract awards and inferior workmanship.

Reconciliation of requests to change or supplement graves marked historically with forms and inscriptions common to that era are a challenge to NCA. These historic headstones/markers/group burial markers are often perceived as inadequate or not meeting the standard set by current NCA regulations. Replacing and altering headstones and monuments have the potential to introduce new and inappropriate features to cultural or historic cemetery landscapes.

Opportunity

NCA sees great opportunities in the authority to use NHPA Section 111 for leasing historic buildings, and marketing them to Veteran organizations, historical societies, and small businesses.

Successes

Lodges. Despite its challenge to preserve and use its historic lodges over the past three year reporting period, two NCA lodges are currently in the design-development phase and will be rehabilitated and used within two years. All work will meet the Secretary of the Interior's Standards. The 1934 lodge at Nashville National Cemetery, vacated in 2003 and never mothballed, will be rehabilitated and expanded to house a dozen NCA employees.

Rehabilitation and use of this lodge was a stipulation in the memorandum of understanding signed to mitigate the demolition of the Memphis lodge; the Nashville lodge is the only extant cemetery lodge in Tennessee overseen by NCA. The lodge at Fort Leavenworth National Cemetery, long housing the NCA Memorial Programs

Service, was vacated in 2014 and will be renovated and reoccupied by the same office within two years.

Commemorative Monuments. In the past three years NCA has furthered monument accountability beyond simply reporting new ones and documenting condition assessments for its most 160 commemorative objects. Treatment reports for about 60 monuments treated prior to fiscal year 2012 were provided to cemetery and regional offices. Approximately 70 monuments were treated by conservators, and treatment reports will be produced and sent to overseeing NCA offices. A pilot monument-care course, developed in partnership with Heritage Preservation Inc., was held in June 2012 and was attended by a dozen NCA personnel. Starting in 2013, NCA expanded its triennial Facility Condition Assessment process to include monuments and other objects (signs, plaques, site features); professional conservators are included on FCA inventory teams to assure that conditions are properly recorded. Starting in 2014, cemetery directors have been tasked with completing annual inspections of all monuments treated in the past five years. Written guidance, forms to report vandalism and failures, and related information will be posted on the NCA intranet for staff use as needed.

Use

As stewards of historic properties, federal agencies are expected to manage these properties in a manner that advances the agency's asset management goals and maximizes the protection of the property. EO 13287 Section 4(a) instructs federal agencies to consider historic properties as federal assets that support an agency's mission and contribute to the local economy. The balance of public benefit and access to historic properties is often complicated by an agency's security measures, adding another layer of complexity in the everyday management and use of historic properties. However, federal agencies are consistently developing management plans that allow historic properties to be important assets as well as creative ways to make secure historic properties accessible to the public.

Explain how your agency has used historic properties. What is the total number of your agency's historic properties with an assigned mission and/or purpose?

NCA's properties, in their entirety, have only one mission: to honor Veterans and their families with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to our nation. Individual assets do not have an assigned mission or purpose with respect to the CAI database. However there are essential built features named in the **Act to Establish and to Protect National Cemeteries**, the 1867 legislation that established and shaped these properties. Though established under the War Department, NCA identifies with this law as part of its own heritage. The language calls for permanent masonry lodges for cemetery superintendents, masonry walls, and marble headstones.

Buildings

Superintendent Lodges. Superintend lodges are the single-most significant and prominent built features in the national cemeteries. NCA and leased tenants use many of them, though increasingly they are not occupied because the tenant leaves or NCA moves a cemetery administration function to a new property.

NCA's written policies guiding the use and routine monitoring or care of its historic lodges are outdated and inadequate. Offices within NCA do not maintain records of past and current leases, or condition inventories made at the start/end of a lease. For example two policy letters date to the 1990s: 401 Policy Letter - 1996 *Vacating Cemetery Lodges* and 401 Policy Letter -1992 *National Cemetery Lodge Leasing and Historic Preservation Issues Concerning National Cemeteries*.

In the past three years, improvements and decline of NCA lodge are as follows:

- In 2014, mildew concerns and accessibility compliance issues have required the temporary relocation of employees from the former 1905 Fort Leavenworth National Cemetery lodge, KS. It will be renovated in fiscal year 2014-15, and reoccupied by NCA staff.
- The Nashville National Cemetery lodge, 1934, vacant since 2003, will be renovated and expanded in fiscal year 2014-15, and occupied by NCA personnel.
- The 1928 lodge at Danville National Cemetery, VA, vacant since prior to 2011, was studied by NCA in 2012-13 as a potential pilot adaptive reuse project wherein the building would become an indoor columbaria. This concept has been superseded by the possible need to reuse it as an administrative office if the cemetery is reopened through the acquisition of additional land.

Non-VA Tenants:

- The lodges at Annapolis National Cemetery, MD, and City Point National Cemetery, VA, had been occupied by police office functions until recently. At Annapolis, water damage that occurred after the tenant moved out has substantially damaged the interior and NCA must determine whether to repair or mothball the building.
- The Historic Wilmington Foundation, a non-profit, is the lodge tenant at the Wilmington, NC national cemetery.
- Cypress Hill National Cemetery, NY, has a long-term tenant.
- The 1874 Glendale National Cemetery, VA, lodge is occupied by a National Park Service interpretive office.

Structures

The memorial function of national cemeteries is often focused on rostrums, raised platforms that were built between the 1880s and 1940s, as small, free-standing features or imbedded into enclosure walls. This structure is typically utilized for Memorial Day programs. Over the years many nineteenth-century rostrums have been altered by the removal of roofs or trellis, but this feature could easily be restored based on existing documentation. Occasional open plazas built as “rostrum areas” were short-lived features before the Army ceased to build them in the late 1940s. NCA oversees 36 rostrums today.

Rostrums are not considered spaces the general public needs to access, but NCA needs to develop alternatives that provide accommodation on annual Memorial Day programs, per the Americans with Rehabilitation Act of 1973. To permanently alter these structures would adversely affect their historic character and integrity. The need to document accessibility requirements for rostrums has slowed rehabilitation or repair construction projects, despite poor FCA grades. The National Park Service has renovated and reconstructed rostrums at its national cemeteries that are identical to NCA’s without meeting requirements; NCA anticipates using the same justification to rehabilitate and use its historic rostrums in the future.

- The NCA lodge most likely to be rebuilt or rehabilitated, and in doing so to set a precedence for not providing for accessibility accommodation, is at Fort Scott National Cemetery, KS. As of 2013, NCA has generated a scope of work to develop construction documents to correct the failing rostrum, built in 1886, to its original appearance to develop to rehabilitate the rostrum. The structure is presently closed off for safety reasons.

In 2009 NCA introduced a new product, a memorial wall to honor individuals whose remains were cremated and scattered or not available. The policy that indicates where to use the memorial wall considers the historic status of the property: “A memorial wall feature will not be placed within the original grounds of historic cemeteries. However, if a historic cemetery is being expanded with the addition of new land, the addition of a memorial wall in the new expansion area will be evaluated against the factors in paragraph three.” Paragraph three requires that the wall avoid the “creation of a negative impact on historic resources.”⁷

Objects: Collections/Exhibits

⁷ Memorandum, “Memorial Walls in Department of Veterans Affairs National Cemeteries,” April 13, 2009.

Florence National Cemetery Archeological Artifacts. During the expansion of historic Florence National Cemetery, SC, archeological artifacts (38FL2) were recovered. In February 2012, NCA entered into a long-term loan agreement with the South Carolina State Museum to curate 31 boxes of artifacts. Every three years the museum must report to NCA on the condition of the collection. The term of the loan is 10 years with four potential five-year extensions.

Related to this loan, seventeen outstanding objects from the NCA collection have been loaned from the museum to the local Florence County Doctors Bruce and Lee Foundation Library for display in a cabinet designed for this purpose. The one-year loan may be renewed.



Figure 20 Artifacts recovered during Florence National Cemetery expansion, displayed in local library. Credit: AMEC.

The previous triennial report included information about a project at San Francisco National Cemetery that benefited NCA's historic fence and gates. The lead agency, California Department of Transportation (CALTRANS) had to mitigate impacts to the NCA property as the result of widening Doyle Drive. CALTRANS has overseen the comprehensive restoration of a ca 1880s cast-iron gate and rehabilitation of the connecting fence. The gate was missing an ornamental medallion. NCA has one in its collection, and it was loaned to CALTRANS's conservator in order to replicate one that was affixed to the gate.



Figure 21. Gate medallion from NCA History Collection.

The 32nd Indiana Infantry Monument, or the “Bloedner” monument, is currently on loan to the Frazier History Museum in Louisville, Kentucky. Per its agreement with NCA, starting in fiscal year 2012 the museum is required to: 1) verify the condition of the monument on an annual basis, and 2) provide a detailed monument assessment report by a qualified conservator every three years. Annual letters have been provided, and the first assessment report is due to NCA in June 2014.

Related to this, three example carving samples generated by vendors who competed to carve the successor 32nd Indiana Infantry Monument were included in the exhibit “The Art of the Marble Memorial-Historic and Contemporary,” mounted at the Rutland Art Association/Chaffee Art Center from October 7 through November 16, 2011.



Figure 22. Stone-carving example, about 8 inches square, submitted by The John Stevens Shop of Newport, RI, and was awarded the contract to carve the successor 32nd Indiana Infantry Monument.

In what ways has your agency used technologies and/or media, including the Internet, to promote heritage tourism as a use of historic properties?

Interpretive Signage

As reported in the previous triennial report, in fiscal year 2011, NCA sought to develop a Civil War sesquicentennial project to produce thematic interpretive signs for installation nationwide. In May 2013, NCA entered into a contract to provide 191 interpretive signs for national cemeteries and soldiers' lots established as a result of the Civil War. As of January 2014, "generic" interpretive signs illustrating the origins of the cemetery system were delivered and installed at 79 Civil War-era national cemeteries. Nineteen NCA sites will receive interpretive signs addressing Confederate burials. The balance of the signs will provide individual histories of national cemeteries and soldiers' lots. All signs will be delivered by summer 2015.

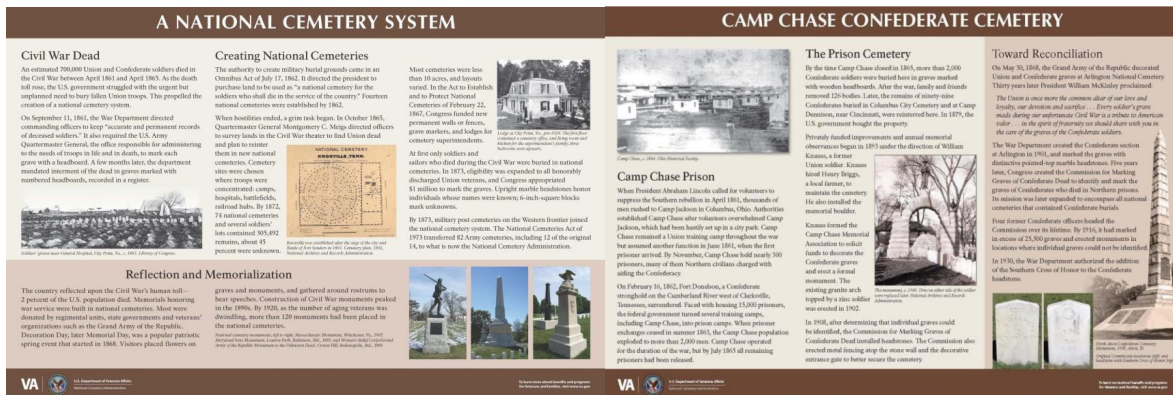


Figure 23. Two interpretive signs representative of 179 that are going to be installed in Civil War-era cemeteries through 2015.

Fort Sam National Cemetery expansion. Mitigation includes three interpretive signs, a state historical sign, and a downloadable brochure about the properties historic historical significance. The mitigation was documented in 2009 programmatic agreement and 2014 Memoranda of Understanding; delivery will occur in 2014-2015.

NCA plans to post all interpretive panels it has developed and installed in its cemeteries on individual cemetery webpages and on the History Program web pages so the information is widely accessible to armchair travelers.

Online Resources

NCA Historic Burial Ledgers Digitized. As reported in the previous triennial report, between 2009 and 2011, NCA protected more than 60 fragile, handwritten ledgers containing the burial information for 36 of its oldest cemeteries by reproducing them as digitized high-resolution graphic files.

To promote broader understanding of national cemetery heritage by maximizing agency and public access to this data, in 2011 NCA formally partnered with Ancestry.com. The popular subscription source of genealogical records indexed the NCA ledger entries to be searchable: nearly 114,000 individuals extracted from 9,344 pages. There was no cost to the government. To help commemorate the Civil War sesquicentennial, Ancestry.com authorized NCA to share free access to all of digitized NARA holdings of military cemetery ledgers, more than 556,000 individuals, to other federal national cemetery managers at the National Park Service and Department of Army. Ancestry.com launched subscription access to the burial ledger records on its website in conjunction with Veterans Day 2012. This service continues to be free to NCA and VA researchers.

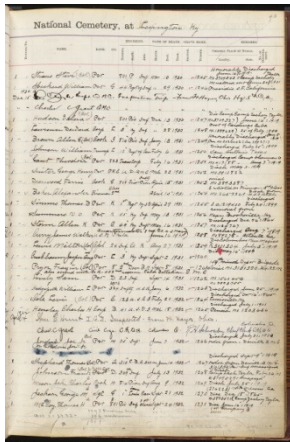


Figure 28. Page from the Fort Leavenworth National Cemetery burial ledger, typical of what Ancestry.com indexed for NCA.

NPS Travel Itinerary. The 'Discover Our Shared Heritage Travel Itinerary' Series, a program of the National Park Service, consists of travel guides to historic destinations around the country, all listed on the National Register of Historic Places. VA's oldest properties are the subject of two itineraries. "Civil War Era National Cemeteries: Honoring Those Who Served" went on-line in September 2011 for the Sesquicentennial (150th anniversary) of the Civil War. It contains information about 117 national and soldiers' lots, developed by the NRHP and agency historians (http://www.nps.gov/history/nr/travel/national_cemeteries/index.html).

History Program pages (<http://www.cem.va.gov/history/index.asp>) are updated regularly with new content reflecting new projects, updates to NR/NHL listings, and monument lists. Starting in summer 2014, NCA history interns will be undertaking primary research on "Notable" individuals buried in NCA cemeteries. Currently about 500 "Notables" are posted online but the number will rise dramatically as we explore the Medal of Honor recipients, American Indians, African Americans, Hispanics and women service members who were remarkable for their time. This information will then be shared with the public and accessible on NCA's website.

If there are no legal restrictions, how has your agency developed or improved procedures for supporting local economic development and heritage tourism for the use of historic properties?

In commemoration of the Civil War Sesquicentennial, NCA will conduct an educational tour of the Alexandria National Cemetery, Alexandria, VA. In June, NCA will lead a tour for NCA employees. In conjunction with the City of Alexandria, the tour will be made public during the summer for 2014 and conducted for the general public. The tour will focus on the Civil War beginnings of the national cemetery, the cemetery's strategic position near the hub of nearby Civil War forts and railroad

depot, and notable people buried in the cemetery—many of which fought in and died during the Civil War. The partnership with the City of Alexandria is still under development, but the tour of the Alexandria National Cemetery will be another tourism opportunity in an area known for its heritage tourism.

Explain how your agency has considered the reuse of historic properties when meeting the “Freeze the Footprint” policy?

There are limited uses for historic properties within NCA based on their location and size. However, when possible some historic properties are considered for office use to eliminate or avoid the addition of leased space or for cemetery director housing accommodations. There is a general misconception throughout NCA that historic lodges cannot be adapted to meet modern office requirements. With the addition of a historical architect to the DCS staff, hopefully this misunderstanding will shift to viewing new opportunities for reuse of historic lodges. In most cases, the original structures are well within the parameters of providing modern and efficient office spaces. Later intrusions (compartmentalizing larger rooms, non-accessible restrooms, dropped ceilings, etc.) contribute to the negative attitude towards the historic structures. Having cemetery staff on site and accessible to cemetery visitors should be a priority, as opposed to renting/leasing off-site accommodations. As a result of the “Freeze the Footprint” policy:

- In spring 2014 NCA determined that historic lodges at the Nashville, 1934, and Fort Leavenworth, 1905, national cemeteries will be rehabilitated and occupied by NCA personnel. The former was vacant and NCA personnel occupied nearby leased space; the latter served as an NCA office.
- Alexandria National Cemetery, VA: In May 2013, NCA initiated a \$2.35 million renovation of this building to correct deficiencies and upgrade systems; it is estimated to be complete by June 2014. The most recent tenant, a veteran service organization, leased the lodge for a nominal fee.
- Currently NCA manages 10 vacant historic lodges that have not been mothballed or for which a use/tenant has not been identified; 6 NCA lodges have been completely or nearly mothballed.⁸

Explain how your agency has identified program improvements, realized in compliance with E.O. 13563, in relation to using historic properties?

⁸ See chart lodges-vacancy 5-2014 revised.

In order to streamline the Section 106 process for all NCA projects, the new NCA historical architect is developing written guidance and checklists for submitting projects for review. Information provided by the cemeteries will be reviewed, a determination of impact to the historic resource will be made, and, if necessary, consultation with stakeholders will be initiated.

Explain the overall condition of the historic properties within your agency's control.

Each historic property has a unique condition assessment; a general condition is not adequate to describe the assets. NCA's portfolio is uniformly described as cultural or historic landscapes with a short list of essential buildings, structures and objects that are historically associated with the memorial and functional mission of national cemeteries. As the business of NCA cemetery development and care has evolved, some contributing historic resources built between 1870 and 1950 are no longer ideal matches for field operations. The number of memorial monuments donated to NCA has grown dramatically since the mid-1970s, but the sequence of comprehensive assessments, conservation, and annual inspections of priority monuments only began in 2008 and NCA's process is still evolving.

Buildings

The Administration has been hesitant to embrace opportunities presented for use of former lodges and other historic buildings to pursue creative, adaptive-reuse into high-quality facilities that meet the expectation of potential contemporary NCA staff or tenants. Thus maintenance on historic lodges, in particular, represents a backlog that cannot compete with mission-critical work such as construction of burial sections and columbaria.

- The primary building type associated with national cemeteries developed prior to 1950 is the superintendent's lodge--a combination dwelling and office. All fifty eight extant NCA lodges are technically historic, listed on or eligible for listing on the NRHP. They range in size from 1,200 SF to 2,500 SF. Currently, thirty are occupied by NCA personnel as an office/administrative space or as residence; six are leased to non-VA interests. Another seventeen are vacant and cannot be occupied until a function/tenant is identified, and the building is completely rehabilitated.

During the past three years, NCA has evaluated the feasibility of reuse of historic lodges in meaningful ways to ally with VA priorities, such as providing housing to homeless Veterans, or mission goals, to provide burial benefits at a historic lodge repurposed as indoor columbaria. In the coming year NCA will be exploring a pilot lodge adaptive-project to house VA Medical Center outreach clinics and related office space.⁹

- Affiliated cemetery operational functions are located in service buildings and restroom facilities that, generally speaking, are over 50 years old and contribute to historic districts, but are not necessarily architecturally significant.

Leases

Through Section 111 of the NHPA, NCA has the opportunity to develop leases that would allow vacant cemetery lodges to be adaptively reused. Proceeds received from lease/rental would be retained and allocated to cover cyclical maintenance and repair of the subject properties. Having occupied lodges in closed cemeteries would provide a monitoring mechanism for both the lodges and the cemeteries, as currently closed cemeteries have no staff on site and are managed from remote locations. Typically maintenance/lawn care/monitoring is handled by contract and overseen by remote NCA staff who infrequently visit the cemeteries and are focused on the tasks at hand, not necessarily the current property conditions, damage or deficiencies.

Unique/Special Function Historic Buildings

Los Angeles National Cemetery. The development of Los Angeles National Cemetery, established 1886, included a range of Spanish-Revival buildings. A chapel/crematorium (now administration office), indoor columbaria, restrooms and maintenance buildings date to the late 1920s-1940s. All contribute to the draft nomination and represent the qualities that merit its listing on the NRHP. The columbarium and a matching (and not fully realized) memorial wall, built by the Work Projects Administration and a modest maintenance building, both ca. 1940, illustrate the inconsistency of NCA's historic-resource planning, monitoring and operational decision making.

⁹ Per NCA Engineer Jill Schattel, May 2014.

- The columbarium is the only indoor structure with this function in the NCA system. site visit in 2013 indicated the building is in poor condition, in contrast to recent condition grades. It is in need of stabilization and rehabilitation due to roof leaks and deferred maintenance, and the niche covers need the attention of a conservator. The memorial wall suffers from failing brick and wooden ceiling. Some of these work items were included in a major project (over \$10 million) in conjunction with the expansion of new columbaria on land to be transferred to NCA from the VA Medical Center. However, due to pending litigation that project has been placed on indefinite hold. As of 2014, NCA is currently developing a plan to address these deficiencies and rehabilitate this historic structure.
- The maintenance building is in fair condition and retains its historic character and integrity despite some superficial alterations, is slated for demolition to provide additional parking within the maintenance yard.
- An ornamental Civil War cannon and a companion site feature, provenance unknown, is in poor condition and needs complete restoration to be displayed again. It was relocated to a protected area of the cemetery prior to a headstone raise-and-realign project that occurred in 2013.



Figure 24. Los Angeles maintenance building slated to be razed for parking.



Figure 30. Damaged cannon at Los Angeles NC.



Figure 31. Three views of the LA columbaria.



Figure 32. LA memorial wall showing damage.

Objects

Private headstones/markers. NCA is the steward of an estimated 2,400 private headstones and markers; these objects have not been fully inventoried. They are located within specific burial sections in some but not all national cemeteries. Exceptional examples of private headstones/markers--in terms of the significance of the burial, or the design, age and maker--can elevate the object to a level wherein NCA will repair or conserve it like a commemorative monument.



Figure 33. Sergeant O'Leary private marker, Santa Fe National Cemetery, NM.



Figure 34. Thompson family private markers (foreground), San Francisco National Cemetery, CA.

What efforts has your agency undertaken to improve the condition of historic properties?

NCA conducts condition assessments periodically and identifies opportunities to either repair or preserve historic assets based on agency priorities as designated in SCIP or opportunities for maintenance and repair projects.

As the agency lacks a use or tenant for some of its most historic lodges, built in the nineteenth century, in the past two years NCA has spent \$950,000 mothballing six of them in partnership with the NPS Historic Preservation Training Center (HPTC)

through an interagency agreement. The fiscal year 2012 agreement was to mothball up to sixteen historic lodges. This initiative grew out of a multi-year project (fiscal year 2008-11) in which HPTC produced forty two Historic Structure Assessment Reports largely for lodges; NCA reported this work for the previous VA triennial period.

In fiscal year 2012, HPTC completely mothballed the lodge at Finn's Point National Cemetery, NJ. Built in 1877, vacant since 1997, this was also the lodge NCA selected to be documented in measured drawings by the Historic American Building Survey (HABS) as part of a larger historic context on lodges because of extant character-defining materials. During fiscal years 2012-13, five others were largely mothballed; outstanding tasks are setting up security systems--alarms, lightning protection. Lodges stabilized to date were built in the late 19th century, including the Second French Empire design with the iconic mansard roof.

The lodges were mothballed consistent with *Preservation Brief 31: Mothballing Historic Buildings*. Corresponding historic structure treatment reports are due to NCA before the end of fiscal year 2014. Further work is on hold pending agency interest in occupying some vacant lodges, and a requirement to develop a new IA agreement document with NPS for additional stabilization.

Discuss how the condition of your historic properties affects your agency's ability to use them in support of its mission.

There are limited uses for historic properties within NCA. Foremost, the historic buildings are in cemeteries. When possible, some historic properties are considered for office use or in some cases for residential use in support of cemetery operations that provide burial or memorial benefits to Veterans and their eligible family members.

The lodges are generally small, under 2,800 square feet, and require substantial upgrades in terms of systems (lighting, water, AC/heat, security, computer systems) to make them attractive to potential tenants. As of ca. 2012, NCA no longer employs Real Estate staff, so the expertise needed to seek appropriate long-term tenants, identify upgrade needs for historic buildings, and prepare leasing agreements is very limited.

Describe your agency policies that promote and/or influence the use of its historic properties.

NCA does not have current policies that either promote or influence its historic properties, beyond those issued by the Department, including VA Cultural Resource Management Procedures - Handbook 7545, and those relevant to all federal agencies.

For example, as historic, small national cemeteries are expanded to provide new burial sections, historic lodges are abandoned. Historic lodges are not typically required for cemetery operations at the older properties as there are few burials. This occurs when the expansion is a discontinuous "annex" --as seen at Salisbury, NC, and Port Hudson, LA (the new property is named "Louisiana National Cemetery" but it shares an administrative unit number with Port Hudson), or when a completely new national cemetery opens --as occurred when Washington Crossing National Cemetery opened up in Pennsylvania, approximately 25 miles from historic Beverly, New Jersey. The Port Hudson lodge, part of a National Historic Landmark property and a "Meigs" design, has been unoccupied during the past three years.

The Beverly lodge, restored after a small fire on the second floor, continues to be unused because the administration of Washington Crossing is housed in a new building. This new cemetery contains two historic buildings that were acquired with the land and are unoccupied. It is unclear if they have been mothballed. In 2009, NCA entered into a Programmatic Agreement with the Pennsylvania SHPO to allow the development of Washington Crossing National Cemetery while it made decisions about cultural resources; stipulations were spelled out as part of the agreement. Two significant historic structures--Samuel Merrick log house and the John and Timothy Scott Farm--were determined contributing and eligible for listing on the NRHP. These structures were documented to state level recordation standards, and historic structures reports prepared. Approximately 10,000 artifacts discovered during archaeological investigations await cataloging and curation. NCA was to submit a decision on the Merrick log house structure by April 2012 and the ultimate decision what to do with it was to be implemented by April 2013.



Figure 35. Log house (left), ca.1800, the oldest building in NCA's portfolio and Scott farmhouse, ca. 1860s.

Have you incorporated these policies into your agency's strategic plan?

NCA Strategic Plan (2011-2015) Goal 3 states that the Administration will “ensure that VA’s national cemeteries and State and Tribal Government Veterans cemeteries are maintained as national shrines dedicated to preserving our Nation’s history, nurturing patriotism, and honoring the service and sacrifice Veterans have made”. Objective 3.B in support of that goal states that NCA will “ensure that a comprehensive and professional historical record of NCA exists for future generations”. Under that objective NCA will write the first volume of a comprehensive historical analysis of NCA or its predecessor agencies from its inception and locate, design, fund, and establish a long term archival storage facility with standard environmental controls. Both of these strategies require additional staff resources.

Does your agency have an asset management plan? If yes, explain how this plan accounts for the management of historic properties.

NCA’s asset management plan is conducted in accordance with the SCIP process and is augmented with maintenance and repair projects.

What policies does your agency have to involve stakeholders in its resource management and planning efforts to identify opportunities for the use of its assets in economic development and heritage tourism?

None

Does your agency have protocols for its managers to identify historic properties that are available for transfer, lease, or sale? What criteria are considered when recommending such actions?

N/A.

When negotiating leases, how does your agency budget for the use of lease proceeds in the rehabilitation and maintenance of historic properties?

NCA does not directly attribute lease proceeds to the rehabilitation and maintenance of historic properties although lease proceeds deposited into the Facilities Operation Fund may be used to maintain historic assets through maintenance and repair projects.

Does your agency limit public access to historic properties? If so, what considerations affect decisions to limit access?

All national cemeteries are open to the visiting public daily during daylight hours. Office hours are Monday to Friday 8 am to 4:30 pm; they are closed federal holidays except Memorial Day. Historic buildings that house NCA functions that require public access are available to the public during posted hours. If buildings are occupied by an NCA program that is not publically accessible or non-VA tenant, they are not considered open to the general public.

Explain how your agency has used Section 111 of NHPA in the protection of historic properties. Does your agency utilize Section 111 (16 U.S.C. § 470h-3) authorities in the management of historic properties?

No

If your agency has not used Section 111 (16 U.S.C. § 470h-3) authorities explain why and any impediments for using this authority.

Does your agency adhere to any other federal regulations or authorities in lieu of Section 111 (16 U.S.C. § 470h-3) of NHPA when transferring or disposing of its historic properties (e.g., 36 CFR § 18, Public Building Cooperative Use Act, or regulations developed for use by specific agencies)?

N/A

Explain how your agency has employed the use of partnerships to assist in the use of historic properties. Are there any legal restrictions that would preclude your agency from exploring partnerships for local economic development for the use of historic properties?

NO

If your agency uses partnerships, please describe the nature of these partnerships?

Recent outcomes from NCA partnerships to rehabilitate and/or use its historic buildings have not been promising. Different reasons for these outcomes include location, partner commitment and funding, and level of NCA coordination, as demonstrated below.

- Mound City National Cemetery lodge/service buildings– Enhanced-Use Lease. In 2003, historic structures at the Mound City National Cemetery were leased to the Mound City National Cemetery Preservation Commission (Commission), a not-for-profit corporation through an Enhanced-Use Lease (EUL). The term of the lease is 25 years. The structures included the superintendent's lodge, storage facility, restrooms and parking area. A cooperative agreement with the City of Mound City in Southern Illinois leveraged approximately \$940,000 to renovate the properties for use as an Interpretive/Visitors Center. Renovations followed the Secretary of the Interior's Standards for Historic Rehabilitation. The Commission's mission is to provide Veterans and tourists with an awareness of the cemetery's importance and the history of the Civil War in southern Illinois; however, the location is hard to visit and it is unclear how often or how many tourists are attracted to the cemetery. This partnership benefited the Administration and these historic resources, which remain in good condition.

NCA cannot rate its success as museum/interpretive center, as the lodge contains minimal artifacts and no regular staff. The cemetery is located in a remote, economically-challenged locale that does not attract much tourism. As VA's EUL authority now focuses on ending homelessness, this partnership cannot be pursued elsewhere.¹⁰

- Wood National Cemetery "Roundhouse" Lease. In 2010 NCA signed a 10-year lease agreement with the Soldier Home Foundation that would authorize the group to renovate and use the "Roundhouse" in Wood National Cemetery. This small, octagonal building erected ca.1900—now located near the Civil War monument-- was to be rehabilitated and used as a reception space, its original purpose. Although the partner foundation initiated consultation with the Wisconsin state historic preservation office, no work on the building has occurred to date and its condition has deteriorated.
- Keokuk National Cemetery, IA, Lodge - Revocable License. The Keokuk National Cemetery lodge, built 1871, was to be renovated by the Keokuk Historic Preservation Commission (KHPC) through a Revocable License for Non-Federal Use of Real Property agreement made with NCA. The 20-year agreement, signed 1999, should have seen the building turned into a welcome center and museum/war memorial using funds the state granted to KHPC. KHPC gutted the building interior down to its studs, work ceased in 2010, and in May 2012 NCA revoked the partner's license in order to have the building mothballed by the NPS. Due to KHPC's problematic financial situation, NCA waived the requirement that the licensee "restore the property to substantially the same condition as those existing at the time" the agreement was signed. NPS completed mothball treatment in fiscal year 2013.

How have partnerships benefited your agency?

In the past three years, no partnerships have successfully placed a long-term tenant in an NCA lodge for which either market-rate income or in-kind rehabilitation was realized by the Administration. While NCA cannot report recent partnerships that

¹⁰ Website, <http://www.va.gov/assetmanagement/index.asp>, accessed 5-25-2014; see item 34 on list attachment. Authority for the EUL program in which the Mound City lodge has been occupied has expired. The Building Utilization Review and Repurposing (BURR) initiative, a VA strategic effort to identify and repurpose underutilized VA land and buildings nationwide in support of VA's goal to end Veteran homelessness, is an updated EUL program; website <http://www.va.gov/assetmanagement/burr>, accessed 5-25-2014. EULs under BURR are limited to housing homeless Veterans; NCA has evaluated this use and found that it was not feasible.

improved underutilized historic buildings, leases represent an excellent opportunity to partner with local organizations in the future. Typically, cemetery lodges are located within the city limits of municipalities and are sited prominently within the fabric of the community. Examples include Staunton, Winchester and Annapolis.

Does your agency have any volunteer programs? If so, how are volunteers used in the management or interpretation of historic properties?

NCA utilizes volunteers in the national cemeteries but not in the management or interpretation of historic properties.

Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in using historic properties over the past three years and in recognition of the 150th anniversary of NHPA.

Challenge

NCA has been challenged for many years by the need to re-purpose its historic lodges in locations where they do not meet operational needs. The lodge at Memphis National Cemetery was razed in 2013 for this reason.¹¹ Many Civil War-era cemeteries now closed to burials contain lodges that were once home and office to cemetery superintendents. NCA staff is no longer required on site; in addition, turf care and headstone/marker cleaning is increasingly accomplished by contractors. Underutilized, unoccupied, or mothballed cemetery lodges are not routinely monitored or inspected to verify conditions. Funds are not allocated for rehabilitation because tenants or leasing agreements are not a priority. More historic lodges are vacant now than in previous years.

Within the past three years, NCA is faced with a new challenge as it aims to be a steward of its historic buildings concurrent to meeting the goal of VA's "Freeze the Footprint" policy while it develops ten new cemetery properties. The VA system for planning and budgeting for projects (SCIP) is an impediment to historic preservation goals, including reuse. NCA's vacant historic properties do not receive timely inspections and routine maintenance. When funds are available, specialized skills

¹¹ Advisory Council on Historic Preservation (Blusher), "Ongoing Case: Memphis (TN) National Cemetery Building Upgrades," in *Case Digest: Section 106 in Action* (Spring 2012); p.17. Found at: <http://www.achp.gov/casedigest.html>.

necessary to maintain the materials of historic properties are not easily or typically met, including the Secretary of the Interior's Standards. VA's current emphasis on competitive-procurement goals results in delayed contract awards and inferior workmanship.

Opportunities

NCA has been challenged for many years by the need to re-purpose its historic lodges in locations where they are perceived to not meet operational needs. Within the past three years, NCA is faced with a new challenge as it aims to be a steward of its historic buildings concurrent to meeting the goal of VA's "Freeze the Footprint" policy while it develops ten new cemetery properties. NCA will need to explore opportunities to repurpose its historic buildings in creative ways in order to not lose them.

Success

Lodges. Despite its challenge to preserve and use its historic lodges in the past three years, two NCA lodges are currently in the design-development phase and will be rehabilitated and used within two years by NCA personnel. Rehabilitation of a third lodge, 1870, at Alexandria (VA.) National Cemetery, will be completed in 2014; it is unclear if a tenant or NCA will use it. All work will meet the Secretary of the Interior's Standards. The 1934 lodge at Nashville National Cemetery, vacated in 2003 and never mothballed, will be rehabilitated and expanded to house a dozen NCA employees. Rehabilitation and use of this lodge was a stipulation in the memorandum of understanding signed to mitigate the removal of the Memphis lodge; the Nashville lodge is the only extant cemetery lodge in Tennessee overseen by NCA. The lodge at Fort Leavenworth National Cemetery, long housing the NCA Memorial Programs Service, was vacated in 2014 and will be renovated and reoccupied by the same office within two years. Mothball treatments at five lodges were largely completed.

Interpretive signage. NCA initiated project to develop 191 interpretive signs at NCA cemeteries that originated with the Civil War to commemorate the sesquicentennial of that conflict. Up to three signs measuring 24" x 36", composed of fiberglass-imbedded panels set in aluminum bases, will be installed at each of NCA's 79 Civil War-era properties. Many of these cemeteries are closed and unstaffed; the signs will provide the only on-site historical information to visitors. Additional interpretive signs have been installed at other historic cemeteries as mitigation for Adverse Effects. Interpretive signs will be posted on NCA's Internet website too.

Describe your agency's sustainability goals and climate-change adaptation planning, in accordance with E.O. 13514 and how these goals are being met, taking stewardship of historic properties are being addressed

Sustainability reporting is not applicable to buildings of less or equal to 5,000 GSF.
No lodges equal or exceed 5,000 GSF.

Has your agency prepared a Strategic Sustainability Performance Plan and Agency Adaptation Plan in accordance with E.O. 13514, and if so, do they include discussion of historic properties either in general terms or as specific examples?

N/A

Is your agency considering impacts to historic properties when addressing climate-change preparedness and resilience in accordance with E.O.13653?

N/A

How does your agency coordinate historic preservation and sustainability goals in project planning?

N/A

Has your agency rehabilitated or adaptively reused historic properties to achieve sustainability goals?

Future NCA projects with the potential to impact historic resources will consider the following guidance: The *Secretary of the Interior's Standards for Rehabilitation* and *Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Advisory Council on Historic Preservation's guidance for *Sustainability and Historic Federal Buildings*, and the National Trust for Historic Preservation.

How has your agency promoted the rehabilitation of historic properties to achieve energy-efficiency goals as an alternative to new construction?

How is your agency planning for the continuous improvement and better building performance management, energy efficiency enhancements, and energy waste reduction in an open and transparent way, as outlined in the Presidential Memorandum: Federal Leadership on Energy Management (December 2013)?

Geothermal systems installed at Eagle Point, OR, and Quantico, VA

Solar arrays have been installed at Riverside and San Joaquin, CA.

Wind turbines may not be compatible with historic landscape settings.

Has your agency faced resistance to reuse of historic properties due to the perceived incompatibility of preservation with sustainability goals and climate resilient investment?

Typically the historic resources found at NCA sites are too small to realize a benefit from solar or geothermal upgrades. Roof area is too small for solar arrays and square footage is too small to accommodate an efficient geothermal system. These types of sustainability goals are incorporated into new design, and energy systems of historic structures can be tied into new construction where feasible.

APPENDIX A

FY12

- Perry Point VAMC, MD (HD, 121 Bldgs): Eligible 1/4/12
- Fayetteville VA Hospital, AR (SecGen HD, 14 Bldgs): Listed 2/15/12, 12000024
- Indianapolis VA Hospital, IN (SecGen HD, 12 Bldgs): Listed 2/21/12, 12000029
- Tuscaloosa VA Hospital, AL (SecGen HD, 20 Bldgs): Listed 3/07/12, 12000142
- Fort Richardson National Cemetery, AK (HD, 1 Bldg): Listed 3/07/12, 12000056
- Sitka National Cemetery, AK (HD, 0 Bldgs): Listed 3/07/12, 12000057
- Fort McPherson National Cemetery, NE (HD, 2 Bldgs): Listed 3/07/12, 12000075
- Chillicothe VA Hospital, OH (SecGen HD, 52 Bldgs): Listed 3/12/12, 12000110
- Murfreesboro VA Hospital, TN (SecGen HD, 27 Bldgs): Listed 3/12/12, 12000119
- Tuskegee VA Hospital (National Significance), AL (SecGen HD, 36 Bldgs) Listed 3/19/12, 12000140
- Montgomery VA Hospital, AL (SecGen HD, 10 Bldgs): Listed 3/19/12, 12000141
- Pittsburgh Highland Drive VAMC, PA (HD, 17 Bldgs): Eligible 3/26/12
- Batavia VA Hospital, NY (SecGen HD, 18 Bldgs): Listed 3/27/12, 12000160
- Canandaigua VA Hospital, NY (SecGen HD, 29 Bldgs): Listed 3/27/12, 12000161
- Lexington VA Hospital, KY (SecGen HD, 25 Bldgs): Listed 3/28/12, 12000150
- Knoxville VA Hospital, IA (SecGen HD, 28 Bldgs): Listed 5/01/12, 12000246
- Camp Custer VA Hospital No. 100, Battle Creek, MI (SecGen HD, 40 Bldgs): Listed 5/17/12, 12000282
- Wichita VA Hospital, KS (SecGen HD, 17 Bldgs): Listed 5/24/12, 12000303
- Northport VA Hospital, NY (SecGen HD, 28 Bldgs): Listed 5/24/12, 12000312
- Bay Pines VA Hospital and National Cemetery, FL (SecGen HD, 15 Bldgs): Listed 6/27/12, 12000363
- St Cloud VA Hospital, MN (SecGen HD, 23 Bldgs): Listed 8/21/12, 12000524
- Tucson VA Hospital, AZ (SecGen HD, 16 Bldgs): Listed 8/28/12, 12000548

- Roanoke VA Hospital, Salem, VA (SecGen HD, 36 Bldgs): Listed 9/04/12, 12000609
- Lincoln VA Hospital, NE (SecGen HD, 14 Bldgs): Listed 9/10/12, 12000785
- Fayetteville VA Hospital, NC (SecGen HD, 8 Bldgs): Listed 9/19/12, 12000799

FY13

- Togus VAMC and National Cemetery, ME (HD, 49 Bldgs): Listed 10/03/12, 12000826
- Central Branch, National Home for Disabled Volunteer Soldiers and National Cemetery, Dayton, OH (HD, 41 Bldgs): NHL Designated 10/16/12, 03001412
- Albuquerque VAMC, NM (SecGen HD, 18 Bldgs): Additional Documentation and Boundary Clarification Approved 10/31/12, 83001614
- Alexandria VA Hospital (Boundary Increase), LA (SecGen HD, 21 Bldgs): Additional Documentation Approved 11/28/12, 86003116/12000975
- Bedford VA Hospital, MA (SecGen HD, 52 Bldgs): Listed 11/28/12, 12000977
- Northampton VA Hospital, MA (SecGen HD, 33 Bldgs): Listed 12/04/12, 12000994
- Marion VA Hospital, IL (SecGen HD, 13 Bldgs): Listed 1/09/13, 12001146
- New York State Soldiers' and Sailors' Home--Bath VA Center and National Cemetery, NY (HD, 40 Bldgs): Listed 1/23/13, 12001208
- Roseburg VA Hospital and National Cemetery, OR (SecGen HD, 18 Bldgs) Listed 1/29/13, 12001247
- North Little Rock VA Hospital, AR (SecGen HD, 56 Bldgs): Listed 2/20/13, 13000021
- Camp Nelson Historic and Archeological District, includes National Cemetery, KY (HD, 3 Bldgs): NHL Designated 2/27/13, 13000286
- Coatesville VA Hospital, PA (SecGen HD, 29 Bldgs): Listed 3/06/13, 13000059
- Cheyenne VA Hospital, WY (SecGen HD, 14 Bldgs) 13000239, Listed 5/01/13
- Menlo Park VAMC, CA (HD, 16 Bldgs): Eligible 5/3/13
- St Louis Jefferson Barracks VAMC, MO (HD, 7 Bldgs): Eligible 6/13/13
- Lyons VA Hospital, NJ (SecGen HD, 24 Bldgs): Listed 7/03/13, 13000461
- Lebanon VA Hospital, PA (SecGen HD, 26 Bldgs): 13000539, Listed 7/23/13
- Butler VAMC, PA (HD, 17 Bldgs): Eligible 8/12/13

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- Hines VA Hospital, IL (SecGen HD, 31 Bldgs): Listed 10/09/13, 13000814
- National Memorial Cemetery of the Pacific, HI (HD, 2 Bldgs): Additional Documentation Approved 6/18/14, 76002276