U.S. Department of Veterans Affairs Program Comment

Summary of Composite List and Narrative Relating to Historic Utilitarian Properties, FY18

**Introduction**

On October 26, 2018, the Advisory Council on Historic Preservation (ACHP) issued a Program Comment for the U.S. Department of Veterans Affairs (VA). The Program Comment sets forth the way in which VA may comply with Section 106 of the National Historic Preservation Act for its real property actions related to vacant and underutilized buildings and structures.

On an annual basis, the Program Comment requires VA to provide the ACHP with 1) a composite list of properties that could be subject to the Program Comment, and 2) a narrative explaining its conclusion that historic utilitarian properties may be eliminated without endangering the continued National Register of Historic Places (NRHP) eligibility of the historic district in which they are located.

**Summary of the Composite List of Properties**

VA continues to take steps to implement the Program Comment. VA has developed its first composite list, based upon FY18 reporting to the Federal Real Property Profile (FRPP), of **391** buildings that could be subject to the Program Comment, should an applicable undertaking be proposed. Buildings on this list have been reported as vacant or underutilized to the FRPP for 12 months or longer.

Based on past FRPP reporting, for FY18 the Program Comment list will solely consist of buildings. In following years, VA may expand the list to include structures.

The breakdown for the Program Comment list of buildings is as follows:

* About 90% of the buildings are property of the Veterans Health Administration, and 10% are property of the National Cemetery Administration.
* Approximately 83% of the buildings are listed on or eligible for the NRHP.
* Approximately 75% of buildings have been reported vacant or underutilized for 4 years or more.
* Approximately 25% of the buildings are utilitarian.
* VA has concluded standard Section 106 consultation for approximately 20% of the buildings.
* There are 90 VA facilities with buildings subject to the Program Comment.
* There are 36 states with buildings subject to the Program Comment.
	+ Indiana has the most buildings, with 45, then Iowa with 36, and New York with 31.
	+ States not represented in the Program Comment are: Alaska, Colorado, Delaware, Florida, Hawaii, Idaho, Nevada, North Dakota, Oklahoma, Rhode Island, Tennessee, Utah, Vermont, and West Virginia.
* There are two entire historic districts that are subject to the Program Comment. Both have been reported as excess to GSA.
	+ Knoxville, Iowa
	+ Pittsburgh, Highland Drive

**Historic Utilitarian Properties Conclusion**

The Program Comment defines and distinguishes between utilitarian and non-utilitarian buildings. Many VA facilities are characterized by having multiple utilitarian buildings of little architectural design or uniqueness, that were needed during an earlier era of Veterans health care but have since become obsolete. These buildings are ancillary to the cores of VA historic districts, and often have minor or no historic significance and/or diminished or no integrity. In the past, such historic utilitarian properties have been eliminated with SHPO concurrence, without endangering the continued eligibility of the larger historic district.

In 2018, VA determined that 12 buildings on the Northampton (MA) Veterans Affairs Medical Center (VAMC), which is listed on the NRHP, posed potential health and safety concerns, and there were no prudent or feasible alternatives to demolition. These buildings, which consisted of greenhouses, a garage, agricultural buildings, and Quonset huts used as storage, were ancillary to the core of the historic district. All these buildings were utilitarian; eight were contributing and four were non-contributing to the historic district. These 12 buildings were subject to an executed memorandum of agreement (MOA) between VA and the Massachusetts Historical Commission. In this case, VA concluded, and the SHPO concurred, that the elimination of these historic utilitarian properties did not imperil the National Register eligibility of the historic district.

In 2007, VA determined a need for construction of a new State Nursing Home on the campus of the Hampton (Virginia) VAMC, which is eligible for the NRHP. After considering alternatives, VA determined that construction of the new nursing home would require demolition of buildings 13, 16, 61, 69, 70, 72, and 108. Buildings 13 (laundry), 16, (gas house), 61 (gasoline storehouse), and 108 (incinerator) were utilitarian, while buildings 69 and 70 (barracks) and 72 (mess hall) were non-utilitarian. All were contributing to the eligible historic district, except for building 108. These seven buildings were subject to an executed MOA between VA and the Virginia Department of Historic Resources. In this case, VA concluded, and the SHPO concurred, that the elimination of historic utilitarian properties did not imperil the NRHP eligibility of the historic district.

In 2014, VA identified a need for a new mental health facility at the Hampton VAMC, which required the demolition of buildings 6, 107, and 124. Buildings 107 and 124 were utilitarian (a laundry and a garage) while building 6 was non-utilitarian (Chaplain’s quarters). All were contributing to the eligible historic district. These three buildings were subject to an executed MOA between VA and the Virginia DHR. Like the 2007 case, VA concluded, and the SHPO concurred, that the elimination of ancillary utilitarian properties did not endanger the NRHP eligibility of the historic district.

Analysis of Utilitarian Buildings included in the Program Comment:

* Of the 95 utilitarian buildings included in the list, no more than 15 are located at a single facility.
* 32 VA facilities have utilitarian buildings on the list.
	+ Of this number, 29 have five or fewer vacant utilitarian buildings.
* The VA facilities with the most utilitarian buildings are:
	+ Marion, IN (15)
	+ Knoxville, IA (9)
	+ Columbia, SC (6)