U.S. Department of Veterans Affairs Program Comment

2020 Summary of Composite List and Narrative Relating to Historic Utilitarian Properties, FY19 Data

**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 (NHPA) 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 implement the Program Comment. VA has developed its second composite list, based upon FY19 reporting to the Federal Real Property Profile (FRPP), of **371** buildings that could be subject to the Program Comment, should an applicable undertaking be proposed. This is 20 less than last year. 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 FY19 the Program Comment list will solely consist of buildings, as it did for FY18. In following years, VA may expand the list to include structures.

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

* About 93% (n=346) of the buildings are property of the Veterans Health Administration (VHA), and about 7% (n=25) are property of the National Cemetery Administration (NCA).
* About 81% (n=299) of the buildings are listed on or eligible for the NRHP. About 19% (n=72) have been evaluated and are not eligible for the NRHP.
* About 65% (n=243) of buildings have been reported vacant or underutilized for 5 years or more; 9% (n=34) for four (4) years; 15% (n=54) for three (3) years; and 11% (n=40) for two (2) years.
* Approximately 26% (n=98) of the buildings are utilitarian; about 74% (n=273) are non-utilitarian.
* VA has concluded Section 106 consultation for approximately 39% of the buildings.
* There are 85 VA facilities with buildings subject to the Program Comment.
* There are 35 states with buildings subject to the Program Comment.
	+ States with over 20 buildings on the list include California (n=42), Indiana (n=40), New York (n=33), Pennsylvania (n=27), Alabama (n=24), and Montana (n=23).
	+ States not represented in the Program Comment include Alaska, Delaware, Florida, Hawaii, Idaho, Missouri, Nevada, New Mexico, North Dakota, Oklahoma, Rhode Island, Tennessee, Utah, Vermont, and West Virginia, along with the District of Columbia and Puerto Rico.
* There is one entire historic district that is subject to the Program Comment: Pittsburgh, Highland Drive, PA. It has been reported as excess to the General Services Administration (GSA) and GSA is pursuing a programmatic agreement for the disposal of the historic property.
* Sixty-two (62) properties that were on the 2019 Composite List (FY18 Data) no longer meet the criteria to be included on the 2020 Composite List (FY19 Data) and have been removed. Forty (40) new properties that now meet the criteria have been added to the 2020 Composite List (FY19 Data).

**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.

VA determined a need to redevelop the northwest portion of the Columbia (SC) Veterans Affairs Medical Center (VAMC), which is listed on the NRHP, to meet the needs of veterans. The redevelopment will necessitate the demolition of one structure and 8 buildings, including three residential quarters and five garages. The garages (buildings 16, 17, 18, 19, and 23) are all utilitarian and contributing to the historic district, and were subject to an executed MOA between VA, ACHP, and the South Carolina State Historic Preservation Officer (SHPO) in 2020. In this case, VA concluded, and ACHP and SHPO concurred, that the elimination of these historic utilitarian properties did not imperil the NRHP eligibility of the historic district. Examples from the FY18 narrative included similar examples from agreements executed in 2018, 2014 and 2007.

Analysis of Historic Utilitarian Buildings included in the Program Comment:

* Of the 59 historic utilitarian buildings included in the list, no more than 10 are located at a single facility.
* Twenty-two (22) VA facilities have historic utilitarian buildings on the list.
	+ Of this number, 20 have four or fewer vacant or underutilized historic utilitarian buildings.
* The VA facilities with the most historic utilitarian buildings are:
	+ NIHCS Marion, IN (n=10) (Five of these buildings are subject to an executed MOA)
	+ Columbia, SC (n=6) (Five of these buildings are subject to an executed MOA)