



*Dublin, GA VA Medical Center, Building 1*

**Department of Veterans Affairs**

**Executive Order 13287 – Preserve America  
Section 3 Triennial Report**

September 2020



## INTRODUCTION

The Department of Veterans Affairs (VA) is reporting its progress on identifying, protecting, and using historic properties to the Advisory Council on Historic Preservation (ACHP) and Secretary of the Interior (SOI) for the period 10/1/2017 to 9/30/2020, pursuant to Section 3 of Executive Order (EO) 13287 – Preserve America.

VA's mission is to fulfill President Lincoln's promise in his second inaugural address, "to care for him who shall have borne the battle, and for his widow, and his orphan," by serving and honoring the men and women who are America's Veterans. Much of this work occurs in the rich historic fabric built by our nation to care for its heroes.

VA consists of three administrations: the Veterans Health Administration (VHA), the Veterans Benefits Administration (VBA), and the National Cemetery Administration (NCA); and staff offices, including the Office of Construction and Facilities Management (CFM), which is responsible for preservation policy and oversight across VA.

This 2020 report addresses VA's preservation activities related to VHA and NCA real property; VBA is not currently responsible for any historic properties. The main section provides answers to the 10 specific questions posed by the ACHP for this reporting cycle. Appendices A-D address the broad topics of identification, protection, and use of historic properties, concluding with preservation successes, challenges, and opportunities for VA. Appendix E includes project photographs.

## EO 13287 PRESERVE AMERICA SECTION 3: ACHP 2020 QUESTIONS AND VA ANSWERS

### Identifying Historic Properties

1. *Building upon previous Section 3 reports, have your identification methods changed during this reporting period? Approximately what total percentage or portion of inventory has now been surveyed and evaluated for the National Register, and does this represent an increase from your agency's 2017 progress report?*

VA completed National Register of Historic Places (NRHP) evaluations on 42 properties. The NRHP context statement for 3<sup>rd</sup> Generation Veterans Administration Hospitals was approved/accepted by the National Park Service (NPS) on May 22, 2018; six sites have been listed under this context so far. Three other NRHP listings, five eligible determinations and 28 negative evaluations of VA properties occurred during the reporting period. VA had archeological surveys done on over 20 land parcels. All evaluations and archeological surveys were completed by hired contractors.

Newly identified and evaluated properties are in "Appendix A: Identification" below.

2. *Has your organization implemented any policies or practices that promote awareness and identification of historic properties over the last three years?*

VA continued its ongoing National Historic Preservation Act (NHPA) Section 110 efforts based on resource availability. The results promote awareness of historic properties and inform project planning.

In 2019, VA deployed three virtual, on-demand NHPA compliance training courses on the Talent Management System (TMS), VA's internal training platform. These online modules educate employees on preservation law and practice. Live preservation training was provided to CFM staff in October 2018, regional asset managers and chief engineers in April 2018; and to regional and local staff at the following stations: Prescott, AZ VA Medical Center (VAMC) in December 2018, Lexington, KY VAMC in June 2019, Fayetteville, NC VAMC in February 2018, and Walla Walla, WA VAMC in November 2019. Additionally, staff from Albuquerque, NM VAMC and VA Central Office attended ACHP-led Section 106 Classroom Courses.

VA's Historic Preservation Program (HPP) worked with CFM to identify historic properties on sites being considered for use by NCA and VHA prior to actual purchase or lease, with cultural resources reports now routinely prepared.

3. *How has your organization employed partnerships (with federal or non-federal partners) to assist in the identification and evaluation of historic properties over the last three years?*

VA generally hires contractors for identification and evaluation; however, VA has a partnership (inter-agency agreement [IAA]) with the US Army Corps of Engineers (USACE) for construction support which has resulted in identification of historic properties.

Certain facilities have established local partnerships. For example, at American Lake, WA, the VAMC connected with Joint Base Lewis-McChord staff for support in identifying historic properties as part of a real estate undertaking.

In Loudon Park National Cemetery, Baltimore, MD, the grave of Reddy Gray, who escaped enslavement and enlisted in the US Colored Troops (USCT), became the first VA site documented by the NPS's Network to Freedom program, per the National Underground Railroad Network to Freedom Act of 1998.

### Protecting Historic Properties

*4. Have the programs and procedures your agency has in place to protect historic properties, including compliance with Sections 106 (54 U.S.C. 306108), 110 (54 U.S.C. 306101-306107 and 306109-306114), and 111 (54 U.S.C. 306121-306122) of NHPA, changed over the reporting period in ways that benefit historic properties?*

Protection of historic properties pursuant to NHPA is defined by Department-wide policy, VA Directive 7545, Cultural Resource Management and its accompanying handbook. Both were last updated in 2011. Most protection is accomplished through ongoing routine operations and maintenance activities.

As required mitigation for the loss of a historic property, staff at the West Haven, CT VAMC attended historic wood window repair training and continue to apply these specialized skills across the campus including on Buildings 5 and 9.

In September 2019, CFM completed a disposal guide for buildings that can no longer be reused within the agency. In the guide, priority for disposition is the Enhanced-Use Lease (EUL) program, which partners with private developers to create housing for homeless Veterans (for more on this program, see Appendix D, below). If an EUL is not feasible, the next priority is NHPA Section 111 Authority, known in VA as the Historic Reuse Program (HRP), before considering other disposal options (see response to question 9, below).

In the reporting period, NCA issued two policies related to protection:

- NCA 7545 Cultural Resources Management at VA National Cemeteries (consistent with VA Directive 7545), 2019
- NCA 7546 Lodge Management at VA National Cemeteries, 2020

VA's HPP has had a multi-year national Blanket Purchase Agreement (BPA) with a service-disabled, Veteran-owned small business since 2018 for historic preservation

support services. VA leveraged the longstanding ACHP IAA to add temporary virtual staff in early 2018 until two additional permanent CFM staff were hired later in 2018 and 2019 to support the Federal Preservation Officer in the HPP.

CFM developed the Building Reuse Assessment Tool (BRAT) to assess the reuse potential for vacant and underutilized VA properties and presented it at the national American Institute of Architects (AIA) conference in June 2018. Reuse feasibility focused on clinical and therapy services, and residential uses to illustrate the potential contained in these facilities – focusing on standard footprints found at many historic VAMCs and using existing information from VA’s real property database, the Capital Asset Inventory (CAI). Prototype layouts were developed based on a typical, generic “H” floor plan and included a design program based on current VA space and planning standards.

VA’s HPP consists of three professional staff positions. In addition, VHA has full-time cultural resource staff at Walla Walla, WA, and Milwaukee, WI; and, NCA has one preservation architect. Contractors complete a majority of VA’s preservation work. Most regions and some VAMCs have designated a Cultural Resources Management Officer (CRMO) responsible for coordinating NHPA compliance at the facility level.

On April 10, 2020, VA Secretary Wilkie established a departmental Office of History; subsequently, VBA has created a history program which joins those of VHA and NCA and brings the current number of professional historians within VA to six. These programs’ work includes educating the public about VA’s historic properties.

*5. How has your agency employed partnerships to assist in the protection of historic properties over the reporting period?*

VA has employed a number of partnerships to assist in the protection of historic properties, including: the 1887 Fund, West Los Angeles VAMC; American Veterans Heritage Center (AVHC), Dayton VAMC; Dayton National Cemetery Support Committee and Ball State University, Dayton National Cemetery; Milwaukee Preservation Alliance (MPA) and National Trust for Historic Preservation (NTHP), Milwaukee VAMC; and Friends of Historic Jefferson (FHJ), Jefferson City National Cemetery.

In 2019, VA executed a Programmatic Agreement (PA) for implementation of a master plan for the redevelopment of the West Los Angeles VAMC, which envisions rehabilitation of most of the contributing resources within the NRHP-listed historic district. In November 2018, VA selected a private-sector principal developer to oversee implementation of multiple, third-party EULs.

Starting in 2012, the Dayton VAMC began ongoing work with its long-time partner, AVHC, and Ohio State University Extension, Montgomery County Master Gardener volunteers to reclaim the historic grotto garden area. This work, recognized with a 2016 ACHP Chairman’s Award, was included in an exhibit at the US Botanic Gardens in 2019,

“Celebrating New American Gardens,” which featured photos, landscape designs, drawings and project descriptions for 21 gardens spanning the country.

At Walla Walla, WA, the staff archeologist has a robust public outreach program that includes monthly presentations at the YMCA after school programs, elementary school presentations, and an Archeology Day held on the campus. The archeologist also works with the Fort Walla Walla Museum to educate the public by use of a traveling version of the interpretive panels on Fort Walla Walla history currently displayed at the museum.

VA is authorized under 38 U.S.C. 2412 to lease unused or underutilized buildings, or parts or parcels thereof, belonging to NCA for a period up to 10 years. NCA has used this authority to lease historic lodges to governmental, private, and non-profit organizations.

Through the Lodge Rehabilitation Program, NCA partnered with USACE through an IAA to plan repairs to 15 historic cemetery lodges (for more information, see Appendix C).

NCA cooperated with the Camp William Penn Museum, 3<sup>rd</sup> Regiment USCT Reenactors, and College of Physicians of Philadelphia to install interpretation at Philadelphia National Cemetery recognizing the soldiers of the USCT buried there.

During rehabilitation of the Bob Hope Chapel at the Los Angeles National Cemetery, NCA partnered with a UCLA professor of architecture to assist with designing an appropriate interior lighting system for the historic chapel/administrative office.

In August 2019, Tuskegee VAMC partnered with Touching History: Preservation in Practice, a program administered by the ACHP, NPS, and NTHP that encourages African American students enrolled in Historically Black Colleges and Universities (HBCUs) to engage in historic preservation, to welcome six Tuskegee University architecture students on a tour of the medical campus (see Appendix E, Figure 1). Accompanying the students were representatives from the White House Initiative on HBCUs, Tuskegee University’s Architecture Department, ACHP, NTHP Hands-on Preservation Experience (HOPE) Crew, and Alabama State Historic Preservation Office (SHPO).

*6. How has your agency used program alternatives such as Programmatic Agreements, Program Comments, and other tools to identify, manage, and protect your agency’s historic properties over the last three years?*

On October 26, 2018, ACHP issued a Program Comment for VA’s real property actions related to its vacant and underutilized buildings. Changing needs, technology, and medical care have altered how facilities are used and contributed to the obsolescence of many buildings, leading to vacancies and underutilized properties in VA’s portfolio. The Program Comment enables VA to more efficiently complete the Section 106 review process to achieve a reduction of vacant and underutilized buildings and structures, by

creating an alternative process that provides greater project schedule certainty and increased engagement of VA field personnel (see Appendix C, below).

VA regularly uses PAs to identify and protect historic properties during construction projects, or for routine management activities. During the reporting period VA entered into seven PAs.

VA uses a Microsoft SQL database server, the CAI, to manage all real property, including historic properties. A few facilities use Geographic Information Systems (GIS) to manage property, including a contracted effort by NCA (see Appendix B, below).

### Using Historic Properties

#### *7. How do your agency's historic federal properties contribute to local communities and their economies, and how have their contributions changed over the reporting period?*

VA utilizes its historic property portfolio in service of its mission – providing medical care and burial benefits to Veterans. VHA is the nation's largest health care system, serving over 9 million patients annually, many of whom receive treatment in historic buildings. As all 145 national cemeteries are eligible for or listed on the NRHP, every burial in a VA national cemetery – more than 70,000 annually – takes place in a historic property.

Veterans will again get to experience two historic buildings at Asheville VAMC. Building 9, the former Nurses Quarters was vacant for years and slated for demolition while mental health services on campus were offered in modular buildings. The Asheville VAMC leadership recognized Building 9's potential and rehabilitation funds were secured. The Veterans Home and Recovery Center, an outpatient mental health clinic, opened in the building in 2018. Ward C (Building 19), was constructed in 1930 as part of the VAMC. The building was subsequently transferred to private ownership and renovated for use as senior housing. In April 2020, VA re-acquired Ward C, and plans to rehabilitate the building for use as a Substance Abuse Residential Rehabilitation Treatment Program facility.

In addition to owning historic properties, VA occasionally leases a historic property from a private owner as it did in Denver where an 8,000 square foot contributing building to the York Medical Depot/Air Force Finance Center Historic District was renovated for a Community Resource and Referral Center in 2018. This was a return to the property; VA used the site as a supply depot in 1946-47.

Several historic VA hospitals have museums on campus. For example, the Perry Point, MD Veterans Museum, opened on 11/11/2017 in building 504, a historic mill and VA's oldest building (ca. 1735). The museum promotes awareness of the rich history of the Perry Point peninsula, including nearly 100 years of Veterans health care on the site. The museum opening was the culmination of a multi-year rehabilitation project on the mill.

Historic VA campuses have also enhanced pedestrian spaces. Perry Point, MD, and San Francisco, CA, have walking trails which are frequented by Veterans, staff and community members. At Roseburg, OR, and Sheridan, WY, wayside signage throughout the campuses allows pedestrians to learn more about the history of those sites.

VA facilities often host public events, including annual Memorial Day and Veterans Day ceremonies, and special programs. In June 2019, a VA engineer and archeologist gave a tour of the Prescott, AZ VAMC (former Fort Whipple) as part of the Arizona statewide preservation conference. The Bedford, MA VAMC hosts events for the local community, including the annual “Vettes to Vets” fundraising event, as car enthusiasts bring over 600 Corvettes onto the historic hospital grounds to salute Veterans.

*8. What other laws, regulations, or requirements (other than the NHPA) most directly affect your agency’s strategies to protect and use historic properties? What factors have influenced agency decision making on the continued use or re-use of historic properties during the last three years?*

Multiple laws and regulations impact VA’s strategy to use its historic properties. For example, 38 U.S.C. §§ 8161-8169 authorizes VA to enter into EULs of VA real property, including historic assets, to provide housing for homeless Veterans and their families. The Americans with Disabilities Act (ADA, 42 U.S.C. § 12101) and Architectural Barriers Act (42 U.S.C. § 4151) standards can be challenging to meet on a historic medical campus particularly given the large number of disabled Veterans being served. Life safety, physical security and seismic protection requirements also must be met and may not accommodate preservation standards.

Section 201 of the VA MISSION ACT of 2018 established the Asset and Infrastructure Review (AIR) Commission (38 U.S.C. §§ 8122) to review (February through December 2022) Market Studies of all VHA markets and VHA’s National Realignment Strategy. Opportunities developed in these studies and presented in this strategy could include service and facility realignments to include divestitures of facilities and land.

Executive orders can impact VA’s historic property portfolio. Per Executive Order 13781 (3/13/2017), the Department of Defense is transferring 11 historic Army post cemeteries to NCA. These small and largely closed cemeteries are all eligible or listed on the NRHP and are to be transferred by the end of FY20:

Army Cemeteries transferred to NCA as of August 2020:

- Fort Sheridan, IL
- Fort Missoula, MT
- Fort Douglas, UT
- Fort Lawton, WA
- Vancouver Barracks, WA

Army Cemeteries to be transferred to NCA by the end of 2020:

- Benecia, CA
- Fort McClellan Post Cemetery, AL
- Fort McClellan POW Cemetery, AL
- Fort Devens, MA
- Fort Stephens, OR
- Fort Worden, WA

*9. Does your agency use, or has it considered using, Section 111 (now 54 U.S.C. § 306121) of the NHPA or other authorities to lease or exchange historic properties?*

VA Secretary McDonald approved use of Section 111 via the HRP within CFM in 2017. The HRP supplements the EUL program in making vacant and/or underutilized VA-owned historic assets available for reuse at minimal cost to VA. VA has been looking at lessons learned from a couple initial engagements under this authority and is actively involved with the ACHP's inter-agency working group to come up with recommendations to help all federal agencies considering use of Section 111.

The Office of Asset Enterprise Management (OAEM) runs VA's EUL program (described more in Appendix D, below), which has converted approximately 80 historic VHA properties into housing and related services for Veterans in need since first authorized in 1991. These include leases at three of VA's National Historic Landmarks (NHLs): Milwaukee, Dayton, and Leavenworth VAMCs.

VA also leases out limited space in its historic properties to organizations which complement the VA mission, such as Veterans Service Organizations (VSOs) or other groups. Examples include:

- Alexandria, VA National Cemetery: The Veterans of Foreign Wars (VFW) uses the lodge.
- A food service company leases 4,000 SF in a building at the Walla Walla, WA VAMC.
- At the Lebanon, PA VAMC, one section of Building 18 is leased to a state recovery program called Renaissance Crossroads.
- The Bedford, MA VAMC leases out Building 5 to a nonprofit agency providing 60 Single Room Occupancy units to homeless Veterans.

### Successes, Opportunities, and Challenges

*10. Provide specific examples of major successes, opportunities, and/or challenges your organization has experienced in identifying, protecting, or using historic properties during the past three years.*

VA successes include rehabilitation of several buildings through the EUL program, establishment of the VA Office of History, completion of the 3<sup>rd</sup> Generation Veterans Administration Hospitals NRHP context (following 1<sup>st</sup> and 2<sup>nd</sup> generation VA hospitals and Inter-World War Cemeteries contexts), and NCA's many public history initiatives.

Opportunities include continued use of EULs, promoting and growing the HRP to utilize NHPA Section 111 authority, and continued implementation of the West Los Angeles VAMC Master Plan to address vacant and underutilized buildings.

Challenges include the shifting location of the American Veteran population from the Northeast and Midwest to the South and Southwest, and updating historic medical campuses for modern clinical treatment and building standards. As of August 2020, VA has identified an estimated \$20 billion in physical deficiencies, including over \$8 billion needed to upgrade seismic safety issues at VHA facilities.

## APPENDIX A: VA HISTORIC PROPERTY IDENTIFICATION

VA identifies and evaluates historic properties in its real property portfolio, through NHPA Section 110 efforts, and as properties and sites are considered for use either through purchase or lease. To date, VA has identified more than 250 historic properties, including more than 45 NRHP-listed medical centers and facilities and more than 75 NRHP-listed cemeteries and soldiers lots.

VA coordinates NHPA compliance with other planning processes, including the National Environmental Policy Act (NEPA). VA engages qualified consultants to perform environmental assessments that include cultural and historic resource surveys to satisfy NEPA and to provide consultation services to satisfy Section 106. VA is required by law to partner with USACE to manage design and construction of projects over \$100 million which includes review and assessment of NHPA compliance.

NCA is in a unique position regarding historic property identification because the Keeper of the NRHP determined that all National Cemeteries, regardless of age, are eligible for the NRHP. With this universal designation, NCA continues to evaluate individual properties for the NRHP to document site-specific features.

### NHPA Section 110

While the majority of VA identification work is done by contractors in support of specific project planning as part of the Section 106 process, limited nationwide Section 110 efforts continue.

On May 22, 2018, NPS signed the NRHP context statement for the 3<sup>rd</sup> Generation of VA hospitals, which were constructed from 1946-1958. This follows previously reported completed contexts for 1<sup>st</sup> (post-Civil War) and 2<sup>nd</sup> (post-WWI) Generation facilities. Six individual hospitals have been listed on the NRHP under this context so far:

- Dublin (GA), listed 12/10/18
- Topeka (KS), listed 3/7/19
- Louisville (KY), listed 5/22/18
- Grand Island (NE), listed 7/13/18:  
(See Figure 2)
- East Orange (NJ), listed 9/4/18
- Fort Meade (SD), listed 5/29/18

Since 10/1/17, three other VHA properties have been listed on the NRHP:

- "Spirit of the American Doughboy" Statue at Muskogee (OK) VAMC, listed 1/25/2018  
(See Figure 3)
- Palo Alto (CA) VAMC archeological site (CA-SCL-585), listed 10/21/2019
- Livermore (CA) VA Hospital Building 62, listed 4/23/20

VA completed five determinations of eligibility for VAMCs, portions of which SHPOs have concurred are eligible for the NRHP:

- Denver, CO
- Shreveport, LA

- Reno, NV
- Dallas, TX
- Garland, TX

VA completed 28 determinations of eligibility for VAMCs which SHPOs have concurred are not eligible for the NRHP:

- Birmingham, AL
- Phoenix, AZ
- Livermore, CA (except bldg. 62)
- Long Beach, CA
- Palo Alto, CA
- Sepulveda, CA
- Wilmington, DE
- Washington, DC
- Iowa City, IA
- Fort Wayne, IN
- Indianapolis, IN
- Ann Arbor, MI
- Kansas City, MO
- Poplar Bluff, MO
- St Louis (John Cochran), MO
- Durham, NC
- Cincinnati, OH
- Muskogee, OK (except Doughboy statue)
- Oklahoma City, OK
- Altoona, PA
- Erie, PA
- Philadelphia, PA
- Pittsburgh (University Drive), PA
- Wilkes-Barre, PA
- Salt Lake City, UT
- Beckley, WV
- Clarksburg, WV
- Huntington, WV

### Archeology

Archeological studies are typically connected to construction or expansion projects as part of Section 106 review. Since 10/1/17, VA has funded archeological studies in the following locations, with one identified site being listed on the NRHP:

- Tuskegee, AL
- Phoenix, AZ
- Prescott, AZ
- Livermore, CA
- Los Angeles, CA
- Palo Alto, CA (listed)
- Riverside, CA
- Gainesville, FL
- Jacksonville, FL
- Ocala, FL
- Honolulu, HI
- North Chicago, IL
- Springfield, IL
- Kansas City, MO
- Albuquerque, NM
- Raleigh, NC
- Eagle Point, OR
- Roseburg, OR
- Ponce, PR
- Bath, NY
- Indian Falls, NY
- Dallas, TX
- Fredericksburg, VA

In 2018, as part of Section 106 mitigation for post-Hurricane Katrina rebuilding, VA prepared a publication detailing the findings of archeological work in New Orleans, LA. "Becoming New Orleanians: Archeology of Lower Mid-City New Orleans" summarizes the archeological and historical research documenting the history of the people and their homes and shops in Lower Mid-City. The project provided an opportunity for in-depth study of individuals and families

from the past using both written records and archeological remains to preserve the personal stories of this neighborhood for future generations of New Orleanians.

VA did not issue any Archeological Resources Protection Act (ARPA) permits to third-party researchers during the reporting period.

#### VHA Historic Property Identification

- St Louis (John Cochran), MO: As part of planning and consultation for a New Bed Tower & Parking Garage, cultural/historical property assessments were completed in January 2020. One historic property, the condemned Palladium building, was acquired for the project and is not feasible for reuse.
- Dallas, TX: As part of a project for Long Term Spinal Cord Injury & Clinical Expansion for Mental Health, NEPA environmental assessment including cultural/historic resource assessment was completed in August 2018 along with Section 106 consultation. The assessment determined that 9 buildings were NRHP eligible, and 28 buildings and 7 temporary buildings were not eligible.
- Sheridan, WY: Interpretive signage to be installed on campus, including at the parade ground and the flagpole area, will address the historic significance of the site and be fabricated from salvaged limestone blocks from Building 13, which was removed.
- Garland, TX: VA accepted a donation of approximately 35 acres that includes the former Baylor Scott & White Hospital at the former Baylor Medical Plaza I. VA will renovate the interiors of the hospital and commercial building to provide medical care for Dallas-area Veterans. The Vero Building, on North Shiloh Road, was determined NRHP eligible.

## APPENDIX B. VA HISTORIC PROPERTY PROTECTION

VA works to protect its historic properties through routine maintenance and Section 106 consultation when renovating, expanding or disposing. VA has also successfully entered into preservation partnerships that have led to the protection of historic properties, including with other federal agencies or state and local organizations. In cases where undertakings will lead to an adverse effect to historic properties and avoidance is not feasible, VA has resolved impacts through minimization and mitigation. Since 10/1/2017, VA has entered into more than 45 Section 106 agreement documents (Memoranda of Agreement [MOA] or Programmatic Agreements [PA]).

In limited cases, VA hires private-sector consultants to develop preservation plans for its historic properties. The decision to implement preservation plans is made at the local level and at times have been adopted through PAs. During the reporting period five hospitals (San Francisco, CA, Bedford, MA, Lexington, KY, Danville, IL, and Hampton, VA) established preservation plans to assist in the protection of historic properties, and three (Albuquerque, NM, West Los Angeles, CA, and Togus, ME for the NHL Quarters 1) are in development.

During the reporting period, VA enhanced its CAI database to improve real property management of VA's historic properties:

- For any historic properties, either eligible for or listed on the NRHP, real property disposal procedures to require evidence of compliance with NHPA at an asset level for when historic buildings or structures are removed from VA's real property inventory;
- Modification of the historic characteristics of a building's or a structure's record within the database is restricted to HPP users and database administrators. This change helps maintain the integrity of VA's data about historic properties.
- Since 2019, VA has been actively augmenting its geo-location data for its real property assets from collecting only street address information to including latitude and longitude coordinate information to improve the precision and accuracy of real property data making it easier to locate specific VA historic buildings and structures.

### VHA Historic Property Protection

- Manchester, NH: Smyth Tower (1888), which is located on the grounds but predates the Manchester VAMC and was listed on the NRHP in 1978, had an assessment and stabilization project completed in 2019.
- Northampton, MA: The facility established a Historical Committee, made up of passionate employees, community members, and Veterans to celebrate and learn about the facility history and come up with ideas to bring these to the larger community.
  - The committee publicized the VAMC's history to Veterans and employees entering the main building with a display of newspaper articles and photos found on campus and in the local library archives.
  - The committee supported the Section 106 process by providing insight and creative ideas to offset adverse effects resulting from the demolition of small

buildings. These ideas were incorporated into consultation, providing the Massachusetts Historical Commission (SHPO) and City of Northampton valuable recommendations based in ideas from campus users.

- Walla Walla, WA: The facility's SOI-qualified Cultural Resources Program Manager implemented cultural resources awareness training for all contractors and incoming staff.

VA works to protect properties it cannot use through preservation covenants:

- Danville, IL: VA disposed of Building 48, a Carnegie Library, to the Danville Community College with a preservation covenant in July 2019 (see Figure 4).
- Kansas City, MO: In 2018, Windsor Manor, a historic apartment building used for Veterans housing, was identified for excess. In 2019, VA excessed Windsor Manor to GSA, which sold the property at public auction with a preservation covenant.
- Fort Thomas, KY: In 2017, VA sold more than 10 historic residences in Fort Thomas, KY, with a preservation covenant, to the City of Fort Thomas. The city then sold the derelict buildings in 2018 to a developer, which renovated and resold them as private homes.

VA also protected 'heritage assets' that are significant but not 'historic properties':

- St Louis (Jefferson Barracks), MO: New construction of Building 54, which will serve as a Clinical Rehabilitation facility, includes installation of stained glass salvaged from former Building 64 (Chapel). This was coordinated through discussions with MO SHPO and at request of the VAMC's Chaplain Service.
- San Juan, PR: As part of a seismic upgrade project, the main hospital bed tower (Building 1) will be removed in as part of a campus-wide seismic safety effort. Through consultation, the 1965 building was determined not eligible for the NRHP; however, due to the significance of the tower's 10 ft diameter mosaic of the VA seal as a visual focal point of the campus, it was determined that it should be removed and relocated near the new main entrance. A well-known local mosaic artist was hired to carefully remove the mosaic in sections, then clean, restore and reassemble the mosaic, to be re-installed on a concrete pedestal at pedestrian-level, which will have a narrative on its history (see Figure 5). The project is scheduled to be completed in FY20.
- Sepulveda, CA: During NRHP evaluation, stained glass windows were identified as heritage assets worth preserving even though the chapel (building 24) was determined to not be NRHP eligible. The windows were installed in 1976 after being salvaged from the chapel of the San Fernando VA facility, which was heavily damaged by an earthquake in 1971 with much of the campus subsequently demolished.

### NCA Historic Property Protection

In the reporting period, NCA updated two policies related to historic property protection:

- NCA 7545 Cultural Resources Management at VA National Cemeteries (January 4, 2019)
- NCA 7546 Lodge Management at VA National Cemeteries (January 15, 2020)

NCA partnered with USACE to undertake Cultural Landscape Surveys at:

- Marietta National Cemetery
- Corinth National Cemetery
- Chattanooga National Cemetery
- Knoxville National Cemetery

In addition, NCA developed a Landscape Management Plan for Marietta National Cemetery.

#### Lodge Rehabilitation Program:

- NCA is partnering with USACE under an IAA to plan for the rehabilitation of 15 historic cemetery caretaker's lodges. USACE is working with preservation architects who meet SOI Professional Qualifications to update previously completed Historic Structure Assessment Reports (HSARs), review VA Facility Condition Assessments (FCAs) to identify deficiencies, and prepare plans, specifications and cost estimates for the work. USACE will assist NCA with contracting for the construction phase.

After being contacted by the NTHP requesting information on the lodge rehabilitation program, an article titled "Working Among the Graves" was written and posted on the NTHP website to heighten awareness of the lodges, their purpose, and NCA's dedication to returning these lodges to a useable condition.

The following sites are included in the initial Lodge Rehabilitation Program:

- |                      |                      |
|----------------------|----------------------|
| ○ Mobile, AL         | ○ Beverly, NJ        |
| ○ Fort Rosecrans, CA | ○ Fort McPherson, NE |
| ○ Golden Gate, CA    | ○ Santa Fe, NM       |
| ○ San Francisco, CA  | ○ Cypress Hills, NY  |
| ○ Fort Scott, KS     | ○ New Bern, NC       |
| ○ Camp Nelson, KY    | ○ Raleigh, NC        |
| ○ Baton Rouge, LA    | ○ Salisbury, NC      |
| ○ Annapolis, MD      |                      |

#### Historic Wall Rehabilitation Program:

- NCA completed repairs of perimeter walls, which are character-defining features of its cemeteries, to SOI Standards at the following cemeteries with more planned:
 

○ Alexandria, LA	○ Wilmington, NC
○ Corinth, MS	○ Florence, SC
○ New Bern, NC	○ Knoxville, TN

At Washington Crossing National Cemetery, in Newtown, PA, as part of an executed MOA among the ACHP, Pennsylvania SHPO, NCA, and 32 consulting parties, NCA funded the relocation of the Merrick Log House (ca. 1795) to be near the Scott Farm Complex (ca. 1815). NCA partnered with GSA to determine character-defining features and to develop protective covenants that will run in perpetuity with the deed as GSA completes the disposition process.

National cemeteries often hold 100+ year old headstones. NCA has worked to protect and preserve these iconic symbols of military sacrifice through burial-benefit research, new treatments, and appropriate in-kind replacements. Examples include:

- In a federal partnership, NCA worked with the NPS's National Center for Preservation Technology and Training (NCPTT) to test safe methods of removing serious iron staining from headstones in the oldest Civil War section of Beaufort National Cemetery, SC; limiting the quantity of historic headstones to be replaced in kind (see Figure 6).
- In a training at Fort McPherson National Cemetery, NE, staff demonstrated how to correct an inscribed grave number on the back of headstones, using ground marble as filler; then a correct grave number was inscribed. The approach demonstrated how NCA can assure grave accountability without replacing historic headstones.
- NCA developed and promulgated its first public-facing headstones cleaning guidance: [https://www.cem.va.gov/cem/docs/factsheets/Cleaning\\_Headstones\\_Markers.pdf](https://www.cem.va.gov/cem/docs/factsheets/Cleaning_Headstones_Markers.pdf)

Since 2016, NCA has mapped an estimated 2.24 million individual headstones and markers at 101 VA cemeteries. As part of this initiative, feature attributes were documented and organized within multiple Geodatabases. NCA used LIDAR and GPS surveys to locate cemetery features, including headstones, and determine latitude/longitude/elevation. Cemetery data is managed in MS Access databases of headstones and markers with linked photos.

## APPENDIX C. VA HISTORIC PROPERTY USE

VA uses its historic properties in service of its mission. VHA hospitals provide medical care; national cemeteries provide burial benefits. VA has over 8,350 buildings and structures in its real property portfolio; of this number, VA has evaluated more than 7,325 (approximately 88%) for eligibility to the NRHP. Approximately 2,325 of these are historic: NRHP eligible or listed, or NHLs. Of these historic properties, about 85%, or nearly 2,000 buildings and structures, are being used in support of Veterans. More than 5,000 other buildings and structures have been evaluated and determined not eligible.

VHA is responsible for six NHLs; more than 45 VHA hospitals are listed on the NRHP. Over nine million Veterans and their dependents receive medical care through VHA, in many cases at historic VAMCs. For example, at American Lake, WA, approximately 35,000 Veterans receive medical care annually at this historic property.

NCA is responsible for 10 NHLs and has 115 NRHP-listed sites in its real property portfolio (including soldier's lots and monument sites); all 145 national cemeteries are eligible for the NRHP regardless of age. Over 30 historic national cemetery lodges continue to be used as NCA administrative offices.

Changing Veteran health care needs and standards can lead to historic building vacancies. Reuse of these properties generally needs to tie to the departmental mission. The success of the EUL program, where historic properties often benefit from tax incentives to be renovated into housing for homeless Veterans and their families, is because it directly responds to a basic need of some Veterans and also ensures their access to healthcare.

VA facilities often have service priorities that compete with rehabilitation of historic buildings. Life-safety, fire protection, and accessibility codes and standards along with requirements for physical security also pose challenges for reuse of historic VA buildings.

### Historic Reuse Program (NHPA Section 111):

While VA's implementation of the Section 111 authority is recent, there have been pilot HRP projects in Sausalito, CA and Milwaukee, WI.

- Sausalito was an out-lease of an offsite building for development of office space in the San Francisco Bay area. The project was cancelled prior to negotiation and signing of the ground lease with the selected developer as it was determined that the building could not be used in the future to serve Veterans and did not meet VA's long-term real property needs. The property has been reported excess to GSA, which will dispose of it.
- VA continues working on reuse of three historic buildings at the Milwaukee VAMC. A solicitation in 2018-2019 for a developer was unsuccessful. There is a strong historic preservation community in the area and VA plans to broaden its engagement with these partners to solicit wider interest in the redevelopment of the buildings, which are

located in the middle of the campus and present more of a reuse challenge. However, the expected Veterans housing EUL opening in 2021 may create more opportunities.

#### VHA Historic Property Uses

- Columbia, SC: Building 10, the former Nurses Quarters, contributes to the NRHP historic district and was vacant for many years. This 26,000 square foot building is currently being renovated according to the SOI standards to support Primary Care services for Veterans. The project is scheduled for completion in FY21.
- Bay Pines, FL: A display through one of the primary hallways traversed by patients and visitors in the main hospital (Building 1) contains pictures and narratives of the history of Bay Pines VAMC and the early construction. In 2019, the exhibit was expanded near the canteen to explain some of the architectural features of the space. Building 1 is slated for renovation in FY21 and preservation of historic elements on the second floor is designed into the project.
- Hot Springs, SD: On March 2, 2020, VA Secretary Wilkie announced that Veterans seeking health-care solutions in the Black Hills of SD will continue to receive full services at the NHL Hot Springs VAMC for the foreseeable future and put on hold the 2017 Record of Decision for partial closure.

#### NCA Historic Property Uses:

NCA Out-Leasing Program: Authorized under 38 U.S.C. 2412 to lease any undeveloped land and unused or underutilized buildings belonging to NCA for a period up to 10 years, approximately 10 out-leases have been completed within the past 2 years. Lodge out-leases are pursued with interested people/organizations in the local community that have an office use that is approved by NCA. Examples include:

- Jefferson City, MO: NCA worked with Friends of Historic Jefferson (FHJ) to develop a lease for the 149-year-old caretaker's lodge. The 10-year lease allows FHJ to undertake rehabilitation of the lodge for use as an incubator space for historic preservation-related non-profits. FHJ leveraged grant dollars with in-kind labor and donations to undertake a Phase 1 rehabilitation to correct deficiencies and allow the building to be occupied.
- Alexandria, VA: Leased to VFW Post 609
- St. Augustine, FL: Leased to the Florida National Guard
- Cypress Hills, NY: Leased to the non-profit Cypress Hills Development Corporation
- Mobile, AL: Leased to the Friends of Magnolia Cemetery and houses the City of Mobile's cemetery management staff
- Alexandria, LA: Leased to the county's Area Council on Aging

In addition, the Ft. Leavenworth, KS lodge is currently used by VHA, in a cross-VA partnership (see Figure 7).

NCA has an ongoing partnership with CFM to find tenants for its vacant historic lodges. Lodges at the following locations are currently being marketed for lease:

- Marietta National Cemetery
- City Point National Cemetery
- Raleigh National Cemetery
- Wilmington National Cemetery
- Richmond National Cemetery

#### Gettysburg Address tablet:

- In November 2018, VA placed an historic 1909 Gettysburg Address tablet from Los Angeles National Cemetery (replaced on-site with a replica ca. 2010 due to damage) on permanent display in the lobby of VA headquarters. The large cast-iron tablet had been stored in the NCA History Collection. The complete story is found online at <https://www.cem.va.gov/history/resources.asp>.

#### Cemetery Interpretation:

- NCA tasked its History Program with generating a systemwide interpretive plan and multiple interpretive (wayside) signs beginning in FY 2020 and continuing for four years. A successful FY2019-23 Long-Range Plan 3.2.3.1 outcome will be: "Number of VA national cemeteries with wayside markers that provide broad cemetery systemwide historic themes or specific aspects of individual cemeteries." NCA has partnered with Ball State University, Indiana, to develop the comprehensive interpretive sign plan, and to design thematic signs and related digital products through the Intergovernmental Personnel Act authority.
- Digital exhibits were produced by undergrad/grad students through the State Department's Virtual Student Federal Service (VSFS) internship program during 2017-2019. Five individuals produced exhibit content for NCA Internet pages based on historic resources, *Monumental Minnesota* and *Rostrums Over the Years*; and, special populations interred in VA cemeteries: World War I Veteran cemetery superintendents, World War II German POWs at Fort Custer National Cemetery, and World War II repatriation at Long Island National Cemetery ([www.cem.va.gov/history/outreach.asp](http://www.cem.va.gov/history/outreach.asp)).

## **APPENDIX D. SUCCESSES, CHALLENGES, AND OPPORTUNITIES**

VA's historic building footprint and the ever-evolving medical needs of Veterans create both preservation challenges and opportunities for the department. Preservation initiatives, such as the EUL program, are successful when goals align with the VA's mission.

Vacant and underutilized properties on VAMC campuses and in national cemeteries are an ongoing challenge. Vacancies can be difficult to avoid due to changes in medical care, operations, and the significant cost of historic property rehabilitation which must compete with other budget priorities.

### VA Vacant and Underutilized Properties

On June 20, 2017, VA Secretary Shulkin announced a plan to use or dispose of 430 vacant or underutilized buildings that no longer met the needs of the agency, many of which were historic. VA embarked on multiple initiatives in response to this plan:

VA-ACHP Program Comment:

To help comply with the Secretary's plan, VA requested a Program Comment (PC) for Vacant and Underutilized Properties from the ACHP. After negotiations with ACHP and other stakeholders, ACHP released the VA PC on October 26, 2018, which established an alternative, streamlined process for NHPA compliance for undertakings on VA buildings that are identified as vacant or underutilized.

As of July 2020, the PC has been in force for a little less than two years. In FY19 one undertaking was processed under the PC, and in FY20 eight undertakings have been processed.

VA has entered into a partnership with the USACE to complete programmatic mitigation for the PC. The mitigation, which will take the form of a cultural geography report, is anticipated by the end of 2021.

Vacant Buildings Initiative (VBI):

OAEM worked with consultants to comply with NHPA for undertakings to use or remove vacant buildings, starting with the original 430 list.

By contract end, 540 buildings were included in the project due to updated reporting. Of these:

- 81% (440/540) were historic
- 37% (163/440) of the historic buildings were disposed of or reused

VA-General Services Administration (GSA) Partnerships:

VA works with GSA to dispose of property because of GSA's disposal authority. During the reporting period, VA partnered with GSA to dispose of buildings at the following locations:

- Knoxville, IA: VA mostly vacated this campus in 2009; it was listed on the NRHP in 2012. VA had sought a private-sector developer to operate a mixed-use development of the campus, pursuant to VA's EUL Authority. The EUL did not come to fruition, and VA excessed the property to GSA for disposal.
- Denver, CO: Pursuant to section 12(b) of the Federal Assets Sale and Transfer Act of 2016, Public Law 114-287 as amended (FASTA), VA excessed a portion of this campus (six buildings, including one NRHP-eligible building) to GSA in July 2020.
- Pittsburgh, PA (Highland Drive): This 168-acre vacant campus, determined NRHP eligible, was excessed to GSA. GSA is leading consultation for disposal to the City of Pittsburgh.

#### OAEM/Enhanced-Use Lease Program:

In 1991, Congress authorized VA to provide long-term leases to third-party developers to adapt and reuse underutilized buildings or land through a land-use agreement known as an enhanced-use lease (EUL). When originally enacted, the authority was broad, allowing for any use of VA property that was not inconsistent with VA's mission. In 2012, Congress limited VA's EUL authority to support housing for homeless Veterans.

38 U.S.C. §§ 8161-8169 authorizes VA to out-lease underutilized real estate under its jurisdiction or control for up to 75 years to a private, not-for-profit, or local government entity, to develop supportive housing for homeless and at-risk Veterans and their families. OAEM manages the EUL program and a developer builds/renovates, finances, operates, and maintains the housing.

Through this innovative tool, Veterans are provided with both housing and an expanded range of services that would not otherwise be available on medical center campuses. These EUL projects provide safe, affordable living arrangements near health care providers, which contribute to positive health care outcomes for Veterans.

The EUL authority is a key component of the Department's historic preservation program, because historic properties are protected and used to meet VA's mission to end Veteran homelessness and the department's overall asset management program goals. It is a great example of how an agency's aims can be the framework for successful preservation outcomes. Over the past 30 years, the EUL program has successfully rehabilitated approximately 80 historic buildings across the country to SOI standards.

EUL projects are often complex and require multiple funding sources; they are also dependent on the support other federal agencies in addition to private sector partners. Examples of funding sources for EUL projects include: Low Income Housing Tax Credits, Historic Preservation Tax Credits, U.S. Housing and Urban Development (HUD) McKinney-Vento Programs, state and local affordable housing programs, Federal Home Loan Bank funds, HUD-VASH (VA Supportive Housing) vouchers, and project-based Housing Choice Vouchers.

On an ongoing basis, OAEM reviews vacant and underutilized assets, both historic and non-historic, nationwide to identify EUL opportunities. The reviews involve analysis of the CAI, as well as conversations with local VA staff regarding asset availability. OAEM analyzes the feasibility of assets for housing redevelopment, as well as market supply and demand factors. Unless specifically indicated otherwise on a project by project basis, EUL proceeds such as rent come back to VA and may be used for a variety of EUL associated purposes in accordance with 38 USC § 8165. Benefits to VA from an EUL may include cost savings, cost avoidance, and revenue. Benefits to the community include an increase in employment and tax revenues for the local, state and Federal sectors.

During the reporting period, VA completed EUL projects totaling more than 350 units of housing in historic properties. VA also initiated and, in many cases, completed the Section 106 process for projects that could provide more than 400 additional units.

EUL projects in historic properties that have opened during the reporting period include:

- Augusta, GA: Freedom's Path, LLC and Augusta Veterans Residences Limited Partnership developed 168 units of supportive housing and associated services on the campus of the Charlie Norwood VA Medical Center (Uptown). The project consisted of the renovation of three historic buildings on the campus – Buildings 7, 18 and 76 – and included the use of historic tax credits. The project was completed in summer of 2018.
- Leavenworth, KS: In November 2017, VA signed an amendment to an EUL with a private partner to renovate six historic buildings (Buildings 6, 7, 8, 9, 14, and 47) to provide 67 units of permanent housing for homeless and at-risk Veterans and their families at this NHL. Construction was completed in 2019.
- Fort Harrison, MT: In June 2019, the facility opened 11 rehabilitated historic quarters buildings that included 42 units of low-income housing.
- Perry Point, MD: In 2018, a private developer rehabilitated nine historic homes and constructed new houses to provide 75 units of housing and supportive services to Veterans and their families in a part of campus that served U.S. Army munitions plant workers during World War I.

EULs where the Section 106 process has been initiated, and in most cases completed, for historic properties during the reporting period include:

- Milwaukee, WI: Construction of housing for homeless Veterans is ongoing, and has shifted focus to the long-term maintenance and preservation of the NHL campus. Through consultation, VA has determined that multiple historic buildings can be reused through the EUL program. This initial EUL will rehabilitate six buildings to create 100 units of housing for Veterans and was awarded a Save America's Treasures grant in 2019 (see Figure 8).
- Dayton, OH: The rehabilitation of Building 412 (1901) on the NHL-listed campus will lead to 38 units of Veterans housing. This \$8M project, in a building that was vacant since 2012, will house single adults experiencing homelessness.

- Dublin, GA: VA has completed Section 106 consultation to EUL reacquired buildings 34 and 35, which could lead to 40 units of Veterans housing.
- West Los Angeles, CA: Listed on the NRHP in 2014, this 388-acre campus is in a region with a significant need for homeless Veterans housing. VA has been working with multiple partners to redevelop the campus according to a recent master plan and execute EUL projects under the West Los Angeles Leasing Act of 2016. Building 209 has opened with 55 units of housing (see Figure 9); Buildings 205 and 208, constructed as neuropsychiatric buildings on the north end of campus, are being renovated into 120 units; and Building 207 may be renovated into 60 units of housing.
- Lexington, KY (Leestown): The Lexington VA Healthcare System amended its Leestown Campus Master Plan to support an EUL executed in December 2018 leading to the renovation of four historic buildings (5, 6, 7, and 8) and constructing six new buildings. Once complete, the project will consist of 50 units of permanent supportive housing for Veterans.

Challenges to VA's ability to execute EUL opportunities in historic buildings include:

- High Cost to Renovate/Rehabilitate: Many of VA's available assets require significant renovation/rehabilitation work in order to be used for supportive housing. Some of the assets are very small (quarters buildings) and reuse can be cost prohibitive.
- Limited Funding for Development and Operation of Supportive Housing: The costs to renovate and operate VA's underutilized and vacant assets are usually significant and there is limited funding available to private sector developers.
- Limited Supply of Developers/Operators in Certain Markets: In some markets, there is a limited supply of developers/operators of supportive housing.

#### VHA Successes and Opportunities:

Successes:

- Northampton, MA: With the help of the SHPO and the City of Northampton, the facility has greatly improved consultation, reducing time and effort on all sides to review Section 106 packages. This has resulted in a strategic plan to preserve the main campus buildings as much as possible while allowing for greater flexibility in building materials for buildings outside of the historic core to reduce cost. This plan has prioritized funds and provided a template for future projects and strategic project planning.
- Perry Point, MD, the Mansion House (c. 1750) was rehabilitated according to SOI standards into a training/meeting space.
- New Orleans, LA: The site for a new, 1.6M square foot VAMC to replace the hospital damaged beyond repair by Hurricane Katrina included two prominent historic structures – the Pan American Life Insurance building (a.k.a. the “PanAm Building”) and the Dixie Brewery. VA incorporated these structures into the new hospital design. The brewery had fallen into serious disrepair over the years, but VA was able to retain a portion of the building – including the iconic cupola and carriageway – by stabilizing and retrofitting the structure and transforming it into a state-of-the-art medical research

facility which opened in August 2018. VA also restored the PanAm building, refurbishing the exterior to maintain its architectural integrity, and completely renovating the interior to house much of the VAMC's administrative functions.

- Sheridan, WY: Building 1, the original Fort Mackenzie company command building, was renovated into a VA call center.
- Boise, ID: Building 4, the Fort Boise Surgeon's Quarters, served as office and living space for more than 120 years but changing needs led the VAMC to vacate the building in the 1990s. In 2013, Preservation Idaho (PI) proposed rehabilitation through donations of funds, labor, and materials, which required secretarial-level authorization. VA Secretary Shinseki approved the donation, which was the first time this particular authority was used to support a preservation project, and the VAMC moved forward in partnership with PI and local volunteers. In consultation with the ID SHPO, PI rehabilitated the exterior to SOI standards. PI organized volunteer involvement and fundraisers to secure project labor and funding. Grants and donations raised nearly \$100,000 for exterior rehabilitation and roof repairs, an effort undertaken by area Veterans. PI also installed an educational exhibit and interpretive panel. Following exterior stabilization, federal funding was secured to rehabilitate the interior to serve as offices for a National Telehealth Center beginning in the second half of 2017. VA professionals offer remote, expert care to Veterans around the country from the old Surgeon's Quarters.
- Bay Pines, FL: The VAMC continues ongoing compliance with the FL statewide PA for maintenance and operations and successfully consulted with the FL SHPO on:
  - Design and/or construction for replacement roofs on historic Buildings 11/54, 20, 36, and 24;
  - Design and construction of several new buildings which incorporated the aesthetic of the historic campus, including a new cancer infusion building (in construction), completion of a new Mental Health building (Major project), completion of a research expansion building; and
  - Completion of a design for the 4<sup>th</sup> phase of the interior renovation of Building 1.

#### Opportunities:

- Menlo Park, CA: Vacant historic buildings, such as Building 301, 8 and 9, have remained unoccupied due to their substandard conditions and high cost of renovation. However, due to the local real estate market, the facility is giving new consideration to reuse for services currently provided in offsite leased properties.

#### NCA Successes/Challenges/Opportunities

##### Success:

- Cultural Landscape Restoration of Mount Moriah Naval Plot - NCA partnered with USACE Construction Engineering Research Laboratory (CERL) to scan representative headstones with a 3D laser at Mount Moriah Naval Plot, within the Mount Moriah Cemetery in suburban Philadelphia. This information was essential to develop an alphabet font used to replicate five different headstone designs unique to this lot, dating from ca. 1840-1945. This technology allowed NCA to accurately replace

approximately 850 damaged headstones outside of what is available in its existing product line. With sparse information on the approximately 2,000 burials in the plot, NCA over several years documented with substantial precision the sailors and marines buried here. For example, of the 10 percent of burials listed as “unknown” in records, the research restored the names, dates of death, and service information for most. Along with replacement of 200 standard government headstones, restoration on a ship’s anchor and bollard-and-chain enclosure, and reintroduction of a flagpole, NCA restored the cultural landscape of Mount Moriah Naval Plot. A limited number of headstones have been installed due to cold weather and then Covid-19 work stoppage.

#### Demolitions:

- In December 2019, NCA initiated Section 106 consultation for the demolition of the historic lodges at Corinth National Cemetery, MS, and Danville National Cemetery, VA. The Mississippi SHPO has requested that NCA update the 2010 HSAR before their office could concur with NCA’s determination. NCA has contracted with USACE St Louis to update the HSAR. The Virginia SHPO has requested that NCA reconsider the demolition of the Danville lodge, and has requested that NCA identify additional stakeholders. Both consultations ongoing.

#### Challenges:

- In May 2020 the existence of three mid-1940s headstones marking the graves of German POWs interred at two VA cemeteries attracted national attention because the inscriptions include a swastika and related text described as incendiary. VA Secretary Wilkie, testifying before Congress and in response to media, initially indicated the Administration would not replace them in keeping with historic preservation tenets; however, he reversed that decision and committed NCA to initiate Section 106 consultation for proposed removal and replacement. Fort Douglas National Cemetery, UT, contains a private grave marker; Fort Sam Houston National Cemetery, TX, contains two government-issued headstones; both sites are listed on the NRHP. In June 2020, NCA initiated consultation with the finding that proposed removal of the three headstones is an adverse effect to the historic cemeteries; it has identified both potential stakeholders and suggested mitigation for the removals.
- VA cemeteries contain the graves of 970 WWI-WWII foreign POWs (German, Italian, Japanese) who died while interned in the United States. Interpretive signage is slated for all 21 of these properties to contextualize the circumstances of these graves.

#### Opportunities:

- Dayton National Cemetery, Ohio, began as part of the Central Branch of the National Home for Disabled Volunteer Soldiers, which opened in 1867 to house and care for Union Civil War Veterans. The sprawling campus contained a tunnel connecting the cemetery and hospital. Deceased Veterans were conveyed from the tunnel opening to their grave by a parade of former soldiers. By the 1890s the opening featured decorative stonework and a metal gate. The only known VA structure of this kind, the tunnel headwall is barely recognizable today. NCA has been working with the Dayton National

Cemetery Support Committee (DNCSC), a non-profit friends group, which beginning in 2018 has donated “historic preservation planning services” to restore the appearance of the tunnel entrance and to interpret it. DNCSC has involved numerous stakeholders including the Ohio SHPO and National Trust for Historic Preservation. Ball State University’s Department of Architecture & Applied Anthropology Lab completed non-invasive ground-penetrating radar, digital photogrammetry, and measured drawings of the exterior remains and tunnel interior. In 2019, DNCSC funded an engineering feasibility study that will provide NCA with alternatives and costs for construction. DNCSC plans to donate the construction “services” to NCA to achieve this restoration/rehabilitation project and interpretation.

### Construction Grant Programs

In addition to its own historic properties, VA impacts state-owned facilities through its construction grant programs. VHA administers the State Veterans Home Construction Grant Program (SVHCGP) and NCA administers the State Cemetery Grant Program (SCGP). Both programs provide federal funding for projects at state-run facilities. As with all federal construction grants, projects must comply with the NHPA.

- Certain state Veterans facilities were originally constructed in the decades after the Civil War and are eligible or listed on the NRHP.
- In FY20, through a partnership with VA’s Office of Tribal Government Relations, the SVHCGP initiated program-wide consultation with Federally Recognized Indian tribes for all projects that may receive funding in FY20.
- During the reporting period, SVHCGP executed two MOAs, for new construction at Chelsea, MA SVH, and King, WI SVH.
- In 2019, SCGP executed a MOA for improvement and expansion at the Maui State Veterans Cemetery following a lawsuit filed by the Makawao Cemetery Association against NCA for failing to complete Section 106 before awarding the grant in 2015.

### VHA Property Disposal

VHA had a number of property disposals in addition to the three with preservation covenants reported above in Appendix B: Protection.

In 2011 VA relocated medical services from the Brecksville, OH VAMC to the Cleveland VAMC campus after a large renovation and construction project at the latter site. VA executed a MOA in 2018 for transfer of the vacant campus to the City of Brecksville, which plans to redevelop the land. The city will construct a memorial park and trail to honor the VA legacy on the site.

VHA removed buildings at the following historic hospitals during the reporting period:

- Los Angeles, CA
- Denver, CO
- Dublin, GA
- Danville, IL
- North Chicago, IL
- Marion, IN

- Togus, ME
- Perry Point, MD
- Northampton, MA
- Saginaw, MI
- St Louis (Jefferson Barracks), MO
- Reno, NV
- Canandaigua, NY
- Montrose, NY
- Dayton, OH
- White City, OR
- Providence, RI
- Sioux Falls, SD
- Hampton, VA
- Salem, VA
- Tomah, WI
- Sheridan, WY

VA executed agreement documents for the removal of buildings at the following historic hospitals during the reporting period:

- North Little Rock, AR
- Des Moines, IA
- Manchester, NH
- Bath, NY
- Northport, NY
- St. Albans, NY
- Chillicothe, OH
- Coatesville, PA
- Lebanon, PA
- Milwaukee, WI

NCA removed buildings from the following national cemeteries during the reporting period:

- Willamette, OR
- Knoxville, TN
- Memphis, TN
- Nashville, TN

## APPENDIX E: PROJECT PHOTOGRAPHS



Figure 1 (above): The Touching History: Preservation in Practice program tours the Tuskegee, AL VAMC.  
Figure 2 (below): Building 1 at the Grand Island, NE VAMC, which was listed on the NRHP in 2018.





Figure 3: The Doughboy statue at the Muskogee, OK VAMC was listed on the NRHP in 2018.



Figure 4 (above): In 2019, VA disposed of Building 48 at the Danville, IL VAMC, the Carnegie Library, with a preservation covenant. It is now property of the Danville Community College (HABS IL-1232-C-5).

Figure 5 (below): An artisan removes the Veterans Administration mosaic from Building 1 of the San Juan VAMC. It will be reinstalled at the pedestrian level on campus.





Before



During



After

Figure 6: At Beaufort National Cemetery, NCA tested Akemi Rust Remover on a marble headstone. The product turns a deep purple within 45 seconds of contact with embedded rust. After it was scrubbed with a nylon bristle brush and rinsed with water, the original headstone color was restored.



Figure 7: The historic lodge at Ft. Leavenworth National Cemetery is now in use by VHA, in an example of a cross-VA partnership.



Figure 8 (above): Building 1, Old Main, at the NHL-listed Milwaukee VAMC during rehabilitation. This building will hold housing for homeless veterans. Photo courtesy of The Alexander Company.

Figure 9 (below): Building 209 at the West Los Angeles VAMC after EUL project completion. The building now holds 55 units of housing for at-risk veterans.

