



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

September 29, 2023

Dear Chairman Bronin,

As VA's Senior Policy Official and designated representative to the Advisory Council on Historic Preservation, I am pleased to submit the agency's triennial report on progress in the identification, protection, and use of our historic properties pursuant to Section 3 of Executive Order 13287, "Preserve America."

Please direct any questions about the report to VA's Federal Preservation Officer, Héctor Abreu-Cintrón at [hector.abreu@va.gov](mailto:hector.abreu@va.gov) .

Regards,

A handwritten signature in blue ink that reads "Michael Brennan".

Dr. Michael Brennan, PhD., AIA, NCARB  
Executive Director

Enclosure



**Department of Veterans Affairs**  
**Executive Order 13287 “Preserve America” Section 3 Report**  
**September 2023**

**VA**



**U.S. Department  
of Veterans Affairs**

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Cover Photo: “Old Main,” Building 2 at the Clement Zablocki VA Medical Center in Milwaukee, WI. Photo courtesy of the Alexander Company.

## Section 1: 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 October 1, 2020, to September 30, 2023, pursuant to [Section 3 of Executive Order \(EO\) 13287 – Preserve America](#).

VA's mission is “[t]o fulfill President Lincoln’s promise to care for those who have served in our nation’s military and for their families, caregivers, and survivors.” As part of this primary mission, VA carries out four objectives to fulfill its commitment to Veterans and other beneficiaries through three administrations.

VA’s Veterans Health Administration (VHA) is the largest integrated health care network in the United States, with 1,255 health care facilities serving 9 million enrolled Veterans each year.

Through VA’s Veterans Benefits Administration (VBA), Veterans can earn a range of benefits that help them transition back to civilian life. VA helps service members transition out of military service, and assists with education, home loans, life insurance and more.

VA’s National Cemetery Administration (NCA) provides burial services for Veterans and eligible family members by maintaining 155 cemeteries as national shrines. NCA provides digital memorialization at the Veterans Legacy Memorial to commemorate their legacy, service, and sacrifice to our nation. More than 4 million Americans, including Veterans of every war and conflict, are buried in VA's national cemeteries.

VA’s “Fourth Mission” is to improve the Nation’s preparedness for response to war, terrorism, national emergencies, and natural disasters by developing plans and taking actions to ensure continued service to Veterans, as well as to support national, state, and local emergency management, public health, safety, and homeland security efforts.

Much of the work conducted in service of these missions occurs in the rich, historic fabric built by our nation to care for its military. VA has over 8,600 buildings and structures within its three administrations. Approximately 3,600 of these are National Register of Historic Places (NRHP) eligible or listed, or designated as National Historic Landmarks (NHLs). This means about 42% of VA’s buildings and structures are historic. About 4,500 other buildings and structures have been evaluated and determined not eligible. To date, VA has evaluated approximately 94% of its real property portfolio.

The VA Historic Preservation Office (HPO), which is part of VA’s Office of Construction and Facilities Management (CFM), is responsible for implementing management policies that comply with the legal authorities for preservation policy and oversight across VA. This report addresses VA’s preservation activities solely related to VHA and NCA real property, as VBA is not currently responsible for any historic properties.

## Section 2: Historic Property Identification

### NHPA Section 110

VA continues to identify and evaluate historic properties in its real property portfolio pursuant to compliance with the [National Historic Preservation Act \(NHPA\) Section 110](#) with great success.

VA coordinates [NHPA](#) compliance with other regulatory planning processes, including, but not limited to, the National Environmental Policy Act (NEPA). VA engages Secretary of the Interior (SOI) qualified consultants to perform environmental assessments that include cultural resource and historic property surveys to satisfy NEPA and to provide consultation services to satisfy [NHPA Section 106](#).

NCA is in a unique position regarding historic property identification because the Keeper of the NRHP in 2011 determined that all National Cemeteries, regardless of age, are eligible for the NRHP. This is because National Cemeteries are considered exceptionally significant as a result of their Congressional designation as nationally significant places of burial and commemoration (NRHP White Paper [National Register Eligibility of National Cemeteries – A Clarification of Policy](#), 3/16/11). Consequently, all 155 national cemeteries are eligible for the NRHP. With this unusual designation, NCA continues to evaluate individual properties for the NRHP to document site-specific features.

While the majority of VA historic property identification work is done by contractors in support of specific project planning as part

of the Section 106 process, nationwide Section 110 efforts coordinated by the HPO are also conducted outside of the Section 106 process.

In 2018, the National Park Service (NPS) signed the NRHP context statement for the 3rd Generation of VA Medical Centers (VAMCs), which were constructed from 1946-1958. This follows previously reported completed contexts for 1st (post-Civil War) and 2nd (post-WWI) Generation facilities. During the 2020-2023 reporting period, VA listed 11 individual hospitals under the 3<sup>rd</sup> Generation NRHP context (with date of listing):

Albany, NY (Building 1, 7/15/22)  
Big Spring, TX (10/24/22)  
Bonham, TX (10/13/22)  
Brockton, MA (8/12/22)  
Brooklyn, NY ((5/23/22)  
Buffalo, NY (9/1/22)  
Butler, PA (5/27/22)  
Iron Mountain, MI (6/29/22)  
Montrose, NY (7/15/22)  
Salisbury, NC (5/25/22)  
West Haven, CT (5/26/22)

In addition, VA listed the Newington, CT campus on the NRHP under the 2nd Generation VA Medical Centers context.

VA made three determinations of eligibility for VHA and NCA buildings, which SHPOs have concurred are eligible.

Amarillo, TX - Bldg. 1  
Dallas, TX – Bldg. 1  
Jefferson Barracks, MO – Ordnance Shelter



**Figure 1: Building 1 at the Brockton, MA VAMC, which was listed on the NRHP in 2022.**

VA completed nine determinations of eligibility for VAMCs, which SHPOs or the Keeper of the NRHP have concurred are not eligible:

- New York, NY
- North Chicago, IL
- Jamaica Plain (Boston), MA
- Providence, RI
- Saginaw, MI
- Shreveport, LA
- Syracuse, NY
- Temple, TX
- West Roxbury, MA

In 2022, VA entered into an Interagency Agreement with the US Army Corps of Engineers (USACE) to evaluate 14 VAMCs for NRHP eligibility, and to nominate those properties that are eligible. With this agreement, VA will have evaluated most of

the VAMCs that have been constructed prior to 1973. The evaluations and nominations are expected to be finalized in 2024-2025.

In 2022, VA executed an Interagency Agreement with the NPS to complete a NHL Study of the Tuskegee VAMC, AL. This campus was established after World War I to provide medical treatment to African American Veterans who, due to government segregation policies at that time, were denied treatment at most hospitals. The NPS has executed a task agreement with the Association for the Study of African American Life and History to complete the study. VA anticipates that the nomination should come before the NHL committee in 2025.



**Figure 2: Building 62 at the Tuskegee VAMC. HPO and NPS employees completed an initial site visit in May 2023 in support of the NHL Study.**

Archaeology

Archaeological studies are routinely undertaken for acquisition, construction, or expansion projects as part of Section 106 review. Since 10/1/20, VA has conducted archaeological studies in the following locations, resulting in two newly expanded sites determined eligible for the NRHP:

- Abraham Lincoln, IL (NCA)
- Camp Nelson, KY (NCA)
- Fargo, ND (NCA)
- Fredericksburg, VA (VHA)
- Fort Bliss, TX (VHA)
- Fort Snelling, MN (VHA)
- Fort Snelling, MN (NCA)

- Indiantown Gap, PA (NCA)
- Montrose, NY (VHA)
- Ohio Western Reserve (NCA)
- St. Louis, MO (VHA)
- Western NY, NY (NCA)
- West Los Angeles, CA (VHA)

VA did not issue any [Archaeological Resources Protection Act \(ARPA\)](#) permits to third-party researchers during the reporting period.

Preservation Awareness Programs

VA requires that all appropriate staff with responsibilities over the management and care of agency historic resources to

complete necessary training developed by HPO with regards to cultural resource legal authorities and requirements. During the reporting period, the HPO provided online trainings on compliance with the NHPA to VA employees through an internal online training portal. During the reporting period there were 9 sessions with more than 178 VA employee attendees.

VA has an ongoing interagency agreement with the ACHP, which supports a VA liaison full-time position to the ACHP as well as 12 spots per year of complimentary access to [ACHP training modules](#) for VA employees. During the reporting period, thirty-four (34) VA employees attended ACHP preservation trainings.



### Section 3: Historic Property Protection

VA works to protect its historic properties through routine maintenance and Section 106 consultation during renovations, expansions, or disposals. 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 10/1/2020, VA has [executed or amended](#) 27 Memoranda of Agreement (MOA) and eight Programmatic Agreements (PA).

VA has utilized a [Program Comment for Vacant and Underutilized Properties](#) since October 26, 2018. During the reporting period, two undertakings used the program comment to facilitate and expedite NHPA compliance.

In 2017, the ACHP issued a [Program Comment for Communications Projects on Federal Lands and Property](#) at the request of the U.S. Department of Homeland Security (DHS) to accelerate the review of these projects, particularly broadband deployment, under Section 106 of the NHPA. This Program Comment applies to communication deployment undertakings that are carried out, permitted, licensed, funded, or assisted by the following Land Managing Agencies (LMAs): The U.S. Department of Agriculture's (USDA) U.S. Forest Service (USFS); the Department of the Interior's (DOI) NPS, Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), and Bureau of Indian Affairs (BIA); and the following Property Managing

Agencies (PMAs): DHS and its components, Department of Commerce; VA; and the General Services Administration (GSA). As an agency specifically called out under the PMAs section, VA can utilize this Program Comment and began to do so in calendar year 2020. VA uses this Program Comment to comply with its Section 106 obligations for approximately 10 telecommunication undertakings per year. To date, VA is the only federal agency making use of this Program Comment.

In January 2022, the VA HPO hired its fourth full time employee as a response to significant increases in VA projects. Four HPO staff is the largest number of employees since the creation of the office in the 1970s.

In 2023, VA updated VA Directive 7545, Cultural Resource Management, and VA Handbook 7545, Cultural Resource Management Procedures. These policy documents modernize VA's historic preservation policies to comply with cultural resource laws, regulations, and guidelines, as well as management roles and responsibilities in the context of VA projects and programs.

VA has developed a series of Historic Preservation Plans for at least 19 VHA facilities:

Albuquerque, NM  
American Lake, WA  
Bay Pines, FL  
Bedford, MA  
Boise, ID  
Biloxi, MS  
Chillicothe, OH

Danville, IL  
Fort Harrison, MT  
Jefferson Barracks, MO  
Lexington, KY  
Mountain Home, TN  
Perry Point, MD  
Salem, VA  
San Francisco, CA  
Tomah, WI  
Tuskegee, AL  
Walla Walla, WA  
Waco, TX

### Case Study

In 2020, VA adopted a Historic Preservation Master Plan for the New Mexico Veterans Affairs Health Care System (NMVAHCS) in Albuquerque, NM. The purpose of this document is to provide a planning and design framework for the NRHP-listed district that is within the NMVAHCS. The NRHP District was originally designated in 1982 and consisted of 26 resources (buildings and structures), and all but 16 were considered contributing to the NRHP District during its period of significance from 1931 to 1950.

### Tribal Partnerships

In October 2021, VA stood up its first-ever Advisory Committee on Tribal and Indian Affairs. The committee will provide advice and guidance to the VA Secretary on all matters relating to Indian tribes, tribal organizations, Native Hawaiian Organizations, and Native American Veterans.

VA joined 16 other federal agencies in signing the first [Memorandum of](#)

[Understanding \(MOU\)](#) regarding interagency coordination and collaboration for the protection of tribal treaty and reserved rights in November 2021. This MOU includes enhanced provisions for the consideration of tribal treaty and reserved rights in federal decision making.

In 2022, DOI formally proposed to revise regulations to improve implementation of the [Native American Graves Protection and Repatriation Act \(NAGPRA\)](#). With regulatory revisions on the horizon, VA undertook a reassessment of its compliance with the existing regulations and identified collections under its jurisdiction that may be subject to NAGPRA. VA designated an official point of contact to the National NAGPRA Program, reached out to repositories that house collections removed from VA lands, presented at a meeting of the Southeastern Tribal Alliance for Repatriation and Reburial (STARR), and is working through the repatriation process to meet its NAGPRA obligations jointly with several non-federal repositories.

VA executed a PA in January 2020 to address the potential adverse effects of the expansion of the John Cochran VAMC in St. Louis, MO. After the PA's execution, the Osage Nation requested to modify the archeological and consultation protocols in the PA and to sign as an invited signatory. Through consultation, VA and the original signatories worked with the Osage Nation to amend the PA and the amendment was executed in July 2023.

#### **Section 4: Historic Property Uses**

VA actively pursues opportunities to utilize its historic properties in support of its mission: to serve Veterans.

VHA is responsible for the largest nationwide health care system, and many VA hospitals and medical centers are listed on the NRHP. VA's historic properties continue to contribute to local communities by providing healthcare to Veterans and their families.

#### VHA

During the COVID-19 pandemic, VA's "Fourth Mission" went into effect: To ensure continued service to Veterans, as well as to support national, state, and local public health efforts. VA provided over a million pieces of Personal Protective Equipment to state and local facilities and admitted close to 700 non-Veterans for medical care.

VA took advantage of the blanket extension for federal agency use of emergency Section 106 procedures regarding undertakings that respond to emergency and disaster declarations on the outbreak of coronavirus disease issued by the ACHP (36 CFR § 800.12(b)(2)) during the COVID-19 pandemic. VA reviewed over 15 undertakings using the expedited Section 106 timelines afforded by the extension of the emergency procedures, at least 10 of

which were reviewed during this Section 3 reporting period. One use of the emergency procedures that was invoked at the West Los Angeles Veterans Affairs Medical Center proved particularly successful.

In July 2020, to address personnel and health issues stemming from the COVID-19 pandemic, VA established a temporary one-acre treatment and shelter site on the West Los Angeles VAMC campus through a pilot program known as the Care, Treatment, and Rehabilitative Services Initiative (CTRS), intended to provide homeless Veterans a safe and stable place to reside during the COVID-19 pandemic. The 100-tent capacity site was located on the Grand Lawn, a contributing resource to the West LA VA Historic District located at the campus' southwest corner. The undertaking did not require the installation of permanent structures or utilities, nor did it require tree and vegetation removal. The project area was characterized as having low sensitivity for archeological resources. Pursuant to 36 CFR 800.12(b)(2) as an emergency undertaking, SHPO consultation resulted in a no adverse effect finding. By allowing unsheltered homeless veterans to shelter on the VA campus, the success rate of transition to other existing programs, including transitional and permanent housing, has been above 60% - a great success for a low-barrier entry level initiative.



**Figure 3: CTRS site on the West Los Angeles VAMC campus.**

### NCA

All National Cemeteries are eligible for or listed on the NRHP, and these historic properties contribute to local communities by serving as hallowed grounds for our nation’s service members, Veterans, and their families.

These historic properties also provide ample volunteer opportunities for community members interested in honoring Veterans. NCA encourages involvement from volunteers who are interested in (1) honoring Veterans at the time of burial by serving in Military Funeral Honors details and playing live “Taps” at Veterans’

funerals; (2) staffing the Public Information Centers by greeting visitors, assisting Veterans and visitors with information about the cemetery, providing directions around the grounds, and providing administrative support; (3) joining the Support Committee to plan ceremonies for Memorial Day and Veterans Day, donate helpful items such as golf carts used to transport visitors who need assistance in reaching a gravesite, recruit volunteers for the cemetery, coordinate volunteer activities during special events, and raise and lower cemetery flags on national holidays; (4) sharing history by researching and documenting cemetery history, serving as guides who educate the public about the

nation's history and Veterans' sacrifices, helping identify and catalogue monuments in VA national cemeteries, and providing walking tours to students and other visitors; and (5) helping maintain and beautify the grounds by pruning and sculpting cemetery trees, mending cemetery flags and ensuring they are in perfect condition for public display, sponsoring a burial area or flower bed and maintaining it all year long, and resurfacing and repainting/staining cemetery benches used for reflection and rest.

### Sustainability

In August 2021, VA adopted its Climate Action Plan (CAP), which outlines VA's response to the projected impacts of climate change to the department with the goal of ensuring sustained operations to support the uninterrupted delivery of benefits and services and VA's "Fourth Mission." VA generated this plan in response to the requirements in section 211 of Executive Order (EO) 14008, signed January 27, 2021, which places greater emphasis on taking a government wide approach to the climate crisis. VA will continue its effort to identify mission critical functions at risk from the impacts of a changing climate. As impacts are further identified by the best available science, VA will incorporate climate change adaptation and resilience across agency programs and the management of federal procurement, real property, public lands and waters and financial programs.

In October 2022, the ACHP approved an [exemption](#) that relieves federal agencies from the historic preservation review requirements under the NHPA regarding the effects of the installation of certain

electric vehicle supply equipment (EVSE) on historic properties. VA has utilized this exemption on approximately 40 VHA facilities to place approximately 140 temporary, free-standing, mobile EVSE units in parking areas, allowing for a more streamlined rollout of efforts to focus on clean energy and infrastructure.



**Figure 4: EV charging stations at the Palo Alto (CA) VAMC.**

In November 2022, VA's CFM Office established a Sustainability Program Office (SPO), to meet VA's CAP goals of providing sustainable and resilient facilities to address climate change. The VA HPO has been working closely with the SPO to meet administration sustainability goals and address ways of incorporating their goals with historic property stewardship initiatives.

As part of the ACHP Climate Change and Historic Preservation Task Force, VA worked with other agencies and partners to develop and finalize a draft of the ACHP [Climate Change and Historic Preservation Policy Statement](#), which was adopted in March 2023.

## Case Studies

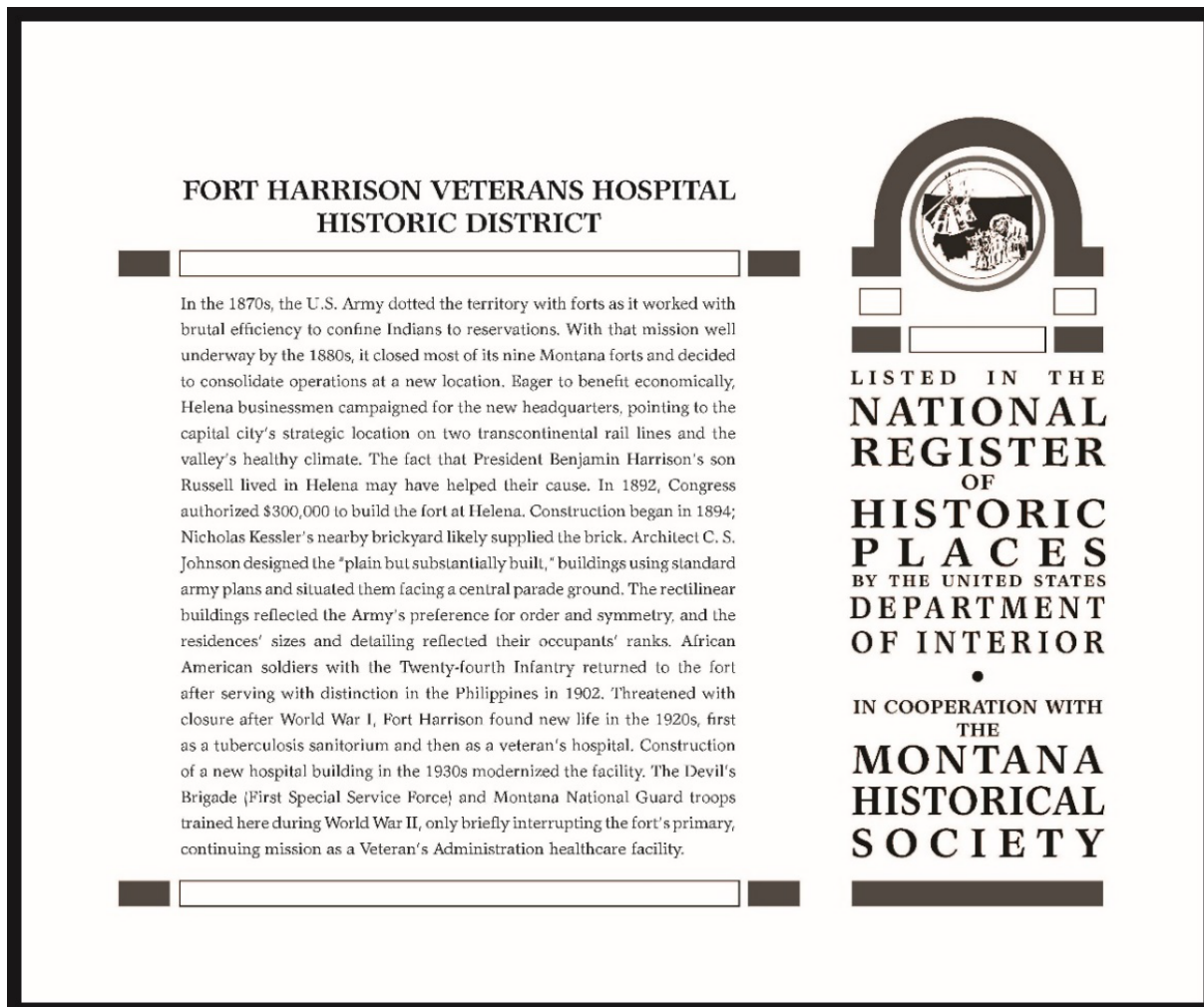
The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) of March 2020 included funding for the VA Grant and Per Diem (GPD) program, to provide grants to assist non-profit organizations serving Veterans by creating individual housing units. This new housing for homeless and at-risk Veterans is intended to help prevent the spread of infectious disease, including COVID-19. In September 2022, GPD funded a grant to the New England Center and Home to Veterans, for an interior renovation at 17 Court Street, Boston, MA. This property is eligible for the NRHP, and the grant project will provide individual housing units for at risk Veterans. VA consulted with the Massachusetts Historical Commission and other parties on this undertaking and came to a finding of no adverse effect.

At the Jefferson Barracks VAMC, located in St. Louis, MO, VA is rehabilitating Building 25 into a training and administrative space. Building 25 is a contributing building in the historic district and the subject interior auditorium is listed as the only intact pre-World War II interior. Working with MO

SHPO, VA revised the proposed plan to minimize the effects of the project on the interior of the historic property. In April 2022, through Section 106 consultation VA and SHPO concurred that the project will have no adverse effect to historic properties.

In Biloxi, MS, VA initiated Section 106 consultation for the exterior renovation of Building 2, which contributes to the NRHP district. This renovation will create new dental space at the facility. Through consultation, VA reached concurrence with the MS SHPO on no adverse effect for the project.

In 2021, the Montana VA Health Care System's Fort Harrison VAMC was awarded the Governor's Award for Preservation Stewardship from the MT SHPO of the Montana Historical Society. VA received this award for the Freedom's Path project, an enhanced use lease that rehabilitated 11 historic buildings to provide residential units for veterans and their families at risk of homelessness. More recently, the Ft. Harrison VAMC installed interpretive signage on the historic campus to help tell the story of the NRHP-listed property.



**Figure 5: Interpretive sign on the Ft. Harrison (MT) VA Hospital campus**

NCA

During the reporting period, NCA partnered with the USACE/Construction Engineering Research Laboratory (CERL) to undertake a series of surveys at national cemeteries. CERL is performing Cultural Landscapes Surveys and Landscape Management Plans at Mare Island Naval Cemetery, CA, Zachary Taylor National Cemetery, KY, and Beaufort National Cemetery, SC.

NCA has been proactively working to maintain/restore/rehabilitate historic

perimeter walls, rostrums, monuments, memorials, and plaques that are important character-defining features within the cultural landscape and define National Cemeteries. NCA has completed rehabilitation projects at Fort Rosecrans, CA, Jefferson Barracks, MO, and Hampton, VA national cemeteries, and currently has projects in the design or construction stage at San Francisco, CA, Zachary Taylor, KY, and St. Augustine, FL national cemeteries, and at Mare Island Naval Cemetery, CA.



**Figure 6: Headstones in Zachary Taylor National Cemetery (KY).**

During the reporting period, NCA partnered with USACE St Louis District under an Interagency Agreement to undertake the rehabilitation of 15 historic cemetery caretaker’s lodges. USACE utilized an existing contract to use local preservation architects who meet the SOI Professional Qualifications. In addition, USACE used an existing contract to provide professional services for the historic caretaker lodges. These preservation architects are updating Historic Structures Assessment Reports (HSARs) and reviewing VA Facility Condition Assessments (FCA) to identify deficiencies. The preservation architects are then preparing plans, specifications, and cost estimates for the rehabilitation. USACE will assist NCA with contracting for the construction phase. The following is a status

update on the Lodge Rehabilitation Program:

Designs at 95%-100% Complete:

- Mobile, AL
- Baton Rouge, LA
- Raleigh, NC

Under Construction:

- Golden Gate, CA
- Annapolis, MD
- Salisbury, NC
- Beverly, NJ
- New Bern, NC
- San Francisco, CA

Construction Contract Pending:

- Fort McPherson, NE



- Fort Rosecrans, CA
- Cypress Hills, NY
- Santa Fe, NM
- Fort Scott, KS
- Camp Nelson, KY

Additional Sites Added for Fiscal Year (FY) 23 include Alexandria, LA, St. Augustine, FL, and Zachary Taylor, KY.

The Friends of Magnolia Cemetery Group has been a long-time resident of the historic caretaker lodge at Mobile National Cemetery, which sits within the larger Magnolia Cemetery, a city property. The lodge had fallen into disrepair and through a Congressional Inquiry, NCA was able to program funding for a complete rehabilitation of the historic lodge. The rehabilitation of the lodge was complete in February 2023 and a rededication service was held, where the Under Secretary for NCA presided over the service. The lodge project received the prestigious Banner and Shield Award for Excellence in Historic Preservation from the City of Mobile’s Historic Development Commission. NCA is working to develop a long-term lease that will allow the Friends to return to the historic structure.

NCA partnered with the St Louis District USACE, who in turn secured the services of a contractor to provide historic preservation expertise on the rehabilitation of the historic chapel at Jefferson Barracks National Cemetery. The project is at 100% design and is awaiting funding for construction.

Since 2016, NCA has employed GIS to map every gravesite in VA-owned national cemeteries and other burial sites. GIS is not used to manage properties.

In March 2023, NCA entered into an agreement with Richmond National Battlefield Park to develop ranger-led tours and brochures for Glendale and Richmond national cemeteries. These tours and brochures are scheduled to be available in the summer of 2023.



**Figure 7: View of the Mobile (AL) National Cemetery lodge.**

NCA is currently developing interpretive signs for all its cemeteries to help visitors understand the history of the individual cemetery, burials within the cemeteries, and the larger context of the cemetery system. Starting in 2020, interpretive signs were developed for enemy Prisoner of War (POW) burials within 23 national cemeteries. Other signage was produced for Medal of Honor Recipients and Houston Riots of 1919 for placement in appropriate cemeteries.

Ellsworth Cemetery, a private cemetery in Westminster, Maryland, was established in 1876 by six Black Union Army Veterans. The Veterans filed Maryland Articles of Incorporation to provide a burial place “for the colored residents of Westminster, Maryland.” The incorporators—Ruben Walker, David Ireland, William Massey, William Adams, Lewis Dorsey and Samuel Bowens—fought in the bloody Civil War campaigns of 1863, 1864 and 1865. They chose to immortalize a white man, Colonel Elmer Ellsworth, a friend of Abraham Lincoln and the first Union Officer to die in the Civil War, as the cemetery’s namesake. Over the years, vandals damaged or destroyed many of the cemetery’s markers. The Westminster community decided to rectify that. They began identifying and restoring headstones. A hand-drawn map in the archives of the Union Memorial Baptist Church identified many gravesites for restoration. Now thanks to volunteers and VA, the graves at Ellsworth Cemetery are identified, marked, and restored.

The Florida National Guard (FLNG) has been a long-time resident of the historic caretaker lodge at St. Augustine National Cemetery. The lease agreement has always been that the lease holders would be responsible for the maintenance and upkeep of the historic structure. The most recent FCA report for the lodge cited a number of maintenance issues that go beyond routine maintenance but are critical for the lodge remaining in good working order and a focal point within the cemetery. NCA added the lodge to the FY23 Multi-Year Lodge Rehabilitation Program and has kicked off a project to rehabilitate the lodge, which will allow the FLNG to continue to call this one-of-a kind historic lodge its home.

Throughout FY 20-23, NCA has conducted programs geared to K-12 students and teachers in national cemeteries as part of the Veterans Legacy Program. The programs are designed to connect students with the men and women buried in VA’s national cemeteries and to introduce them to rich cultural resources and the history of the cemeteries. In FY 20 and FY21, VLP conducted programs using contracts; in FY22, VLP received grant authority under the Veterans Legacy Grants Program (VLGP) and awarded six grants. FY23 Grant Awards will be announced in summer 2023.

#### FY20 Contracts:

- The Gilder Lehrman Institute of American History (GLI) – GLI conducted Teacher Professional Development Programs through five virtual workshops (due to COVID restrictions, no site-based programs were conducted)
- University of Denver (Fort Logan National Cemetery)
- Black Hills State University (Black Hills National Cemetery)
- San Francisco State University (Golden Gate National Cemetery and San Francisco National Cemetery)
- University of California – Riverside (Riverside National Cemetery)
- Texas A&M University (Houston National Cemetery)

#### FY21 Contracts:

- GLI conducted Teacher Professional Development Programs through three virtual workshops and three site-based workshops at Riverside National Cemetery, Baltimore National

Cemetery, and Abraham Lincoln National Cemetery.

- West Virginia Humanities Council (Grafton National Cemetery)
- Santa Fe Community College (Santa Fe National Cemetery)
- Black Hills State University (Black Hills National Cemetery)
- St. Ambrose University (Rock Island National Cemetery)

#### FY22 Grants:

- GLI conducted Teacher Professional Development Programs through three virtual workshops and two site-based workshops at Fort Rosecrans National Cemetery and Cypress Hills National Cemetery.
- West Virginia Humanities Council (Grafton National Cemetery)
- Santa Fe Community College (Santa Fe National Cemetery)
- University of Central Florida (St. Augustine National Cemetery)
- Loyola Marymount University (Los Angeles National Cemetery)
- San Francisco State University (Miramar National Cemetery)

NCA has several historic lodges leased to non-VA entities:

- St Augustine - Lodge is leased to the Florida National Guard
- Cypress Hills - Lodge is leased to the non-profit Cypress Hills Development Corporation
- Mobile - Lodge is leased to the Friends of Magnolia Cemetery and houses the City of Mobile's cemetery management staff

- Alexandria, Virginia - Lodge is leased to the Alexandria Chapter of Veterans of Foreign Wars
- Alexandria, Louisiana - Lodge is leased to the county's Area Council on Aging
- Marietta National Cemetery – non-profit organization
- Richmond National Cemetery – light-use commercial/office
- Wilmington National Cemetery – light-use commercial/office

NCA has an ongoing partnership with VA's CFM Office of Real Property (ORP) to find appropriate tenants for its vacant historic lodges.

Lodges at the following locations are currently being marketed for lease:

- Raleigh National Cemetery
- Richmond National Cemetery



**Figure 8: Students learn more about the lives of African American WWI soldiers during the UCF VLP program at St. Augustine National Cemetery.**

## **Section 5: Preservation Successes, Challenges, and Opportunities**

### Successes - VHA Enhanced Use Leases:

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 property use that was not inconsistent with VA's mission.

In 2012, Congress limited VA's EUL authority to supportive housing for homeless Veterans. From 2012 to 2022, 38 USC §§ 8161-8169 authorized VA to outlease underutilized real estate for up to 75 years to a private, not-for-profit, or local government entity, solely to develop supportive housing for homeless and at-risk Veterans and their families.

However, in August 2022, this authority was amended by P.L. 117-168, the Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics Act of 2022 ("PACT Act"). The PACT Act broadened the EUL program in several ways: VA is now permitted to enter into EULs that provide 1) supportive housing to at risk Veterans and their families, or 2) enhance the use of the leased property by directly or indirectly benefitting Veterans. EULs are now permitted to be up to 99 years in duration; and there is no longer an expiration date on VA's EUL authority.

VA's Office of Asset Enterprise Management (OAEM) manages the EUL program and a developer partner builds/renovates, finances, operates, and maintains the housing.

Through this innovative tool, Veterans are provided with housing and an expanded range of services that would not otherwise be available on VAMC campuses. These projects provide safe, affordable living arrangements near health care providers, which contribute to positive health care outcomes for Veterans. Examples of supportive services provided directly to Veterans by partners include job training, financial management assistance, haircuts, community gardens and playgrounds, computer/technology centers, laundry facilities, community meeting and socializing rooms, fitness centers, support groups, and senior companion programs. Many non-quantifiable benefits to Veterans extend beyond campus, like increased access to healthcare, improved satisfaction and quality of life, improved relations with the community, and other socioeconomic benefits.

The EUL authority is a key component of VA's historic preservation program as its historic properties are protected through reuse to meet VA's commitment to end Veteran homelessness and overall asset management requirements. Now in its 32nd year, the VA EUL program has adaptively used approximately 80 historic buildings, including converting vacant and underutilized properties into housing and related services for at-risk and homeless Veterans – including EULs at NHL VA facilities in Dayton, OH; Johnson City, TN; Leavenworth, KS; and Milwaukee, WI.

As of January 1, 2021, VA has executed 104 EULs with 3,203 units of housing available for Veterans and an additional 379 units in development, many created in rehabilitated

historic buildings that would otherwise be vacant, underutilized, or disposed.

OAEM routinely reviews vacant and underutilized VA assets, historic and non-historic, nationwide to identify EUL opportunities. In reviewing VA's Capital Asset Inventory (CAI), as well as in 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 come back to VA and may be used for a variety of EUL-associated purposes in accordance with 38 USC § 8165.

EUL projects are often complex and require multiple funding sources; they are also dependent on the support of other federal agencies in addition to nonfederal (e.g., private sector and municipal) partners. Funding sources for EUL projects include Low Income Housing Tax Credits, Historic Preservation Tax Credits, US Housing and Urban Development (HUD) McKinney-Vento Programs, state and local affordable housing programs, Federal Home Loan Bank funds, HUDVASH (VA Supportive Housing) vouchers, and project-based Housing Choice Vouchers. Benefits to VA 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. VA EUL partners have raised over \$1.5 billion of private sector capital. Every VA EUL is subject to NHPA Section 106 review, with nearly all concluding with findings of no adverse effect to historic properties. The building rehabilitations

strive to always meet SOI Standards, and many utilize federal and state historic tax credits.

VA's EUL program is a great example of how an agency's aims can be the framework for successful preservation outcomes. Over the past 32 years, in 10+ states, VA's EUL program has been responsible for successfully rehabilitating about 80 historic buildings, ensuring a high standard of care for Veterans and preserving their historic places. Below are highlights from notable EULs active during the reporting period.

In December 2021, at the NHL in Milwaukee, WI, the Soldiers Home rehabilitation project received the 2021 Advisory Council on Historic Preservation/Housing and Urban Development Secretary's Award for Excellence in Historic Preservation. This annual award recognizes historic preservation projects that also provide affordable housing and/or expanded economic opportunities for low- and moderate-income families and individuals. Other awards this project has received during the reporting period include the 2021 Board of Curators Historic Preservation Award from the Wisconsin Historical Society Board of Curators, the 2021 Historic Tax Credit Residential Development that Overcame Significant Obstacles Award (National) from the Novogradac Journal of Tax Credits, and the 2021 Richard H. Driehaus Foundation National Preservation Award (National) from the National Trust for Historic Preservation (NTHP).



**Figure 9: Milwaukee VAMC’s Old Main during rehabilitation.**

The Milwaukee Soldiers Home welcomed its first residents in March 2021 after an 18-month renovation project, which was the culmination of a 10-year effort to save several historic buildings and return them to their original purpose – serving Veterans. This EUL project, which involves the adaptive reuse of six historic buildings on the campus into 101 housing units for homeless and at-risk Veterans and their families, was also awarded a \$500,000 Save America’s Treasures grant from the National Park Service

The Dayton, OH VAMC is also listed as an NHL. Through this EUL, a private developer

renovated Building 412 of the property, providing 27 units of transitional housing and related supportive services for eligible Veterans and non-Veterans. The developer continues to maintain and operate the building. Besides providing ongoing lease payments, this EUL allows VA to avoid costs associated with building maintenance, property maintenance, outpatient services, and domiciliary resources that otherwise would have been utilized in this project’s absence. Prior to the execution of this project, the deteriorating physical condition of Building 412 jeopardized the residential housing services provided to homeless adults via a short-term three-year outlease

of the building. This EUL provided VA the opportunity to outlease the property for a long-term period, obtain necessary building improvements and renovations, and offer permanent supportive housing to homeless and at-risk Veterans and their families.

Phase two of this project, which was completed in December 2021, involved the renovation and reconfiguration of 34 existing units into 38 permanent housing units.



**Figure 10: Rehabilitation work on the Dayton, OH Building 412 EUL.**



**Figure 11: Building 412 at Dayton after project completion, 2021.**



In April 2023, VA under the EUL authority and Section 111, issued a Request for Qualifications (RFQ) for developers interested in redeveloping underutilized historic vacant buildings at the Dayton VAMC. In support of the RFQ, the VA HPO partnered with Preservation Ohio to give a webinar on the history of the campus and the reuse opportunities. The Dayton VAMC has also hosted multiple industry days for developers to learn more about the buildings. Responses to the RFQ are expected by October 2023.

During the reporting period, the VA Greater Los Angeles Healthcare System (VAGLAHS) West Los Angeles Campus has activated a series of EULs. VA has completed projects in Buildings 205, 207, 208, which are all contributing buildings to the West Los Angeles NRHP district. All three buildings, which had been vacant, now provide more than 179 housing units for Veterans. Together with Building 209, which opened in 2017, there are now 233 housing units for Veterans in historic buildings on the campus.



**Figure 12: Building 207 at West Los Angeles, after project completion.**

VA is also in the initial project stages for Buildings 156, 157, 402, and 404, all of which contribute to the historic district. Slated to open by 2025, these four projects provide an additional 374 housing units.

In January 2021, VAGLAHS also announced the execution of a lease for the historic Wadsworth Chapel, the oldest and one of the most iconic landmarks on Wilshire Boulevard with the Wadsworth Chapel Heritage Partners (WCHP), pursuant to its authority under the West Los Angeles Leasing Act of 2016 (Public Law 114-226) (“West L.A. Leasing Act”). The objective of this lease agreement is to fund, design, preserve, renovate, and operate the Chapel, as well as provide services that principally benefit Veterans and their families by providing services for the promotion of health and wellness, including nutrition and spiritual wellness.

The EUL in Leavenworth, KS, an NHL, was signed in 2005 for a 75-year period and covers 38 historic buildings. VA entered into this EUL with the lessee to reuse, redevelop, and renovate these buildings to provide affordable senior housing, long-term care, transitional and permanent housing units, and community office space. This EUL is the subject of an ACHP Section 106 Success Story and has won multiple awards at the local, state, and national levels. In April 2021, the Leavenworth VAMC 75-year outlease success story was also the subject of an ACHP Preservation Perspectives video interview.

#### Successes - NCA:

The NCA Veterans Legacy Grants Program has proved popular with universities,

colleges and K-12 schools and interest is growing across the country. In FY22, NCA received 14 applications and made six grant awards. In FY23, NCA received 18 applications; awards will be announced in June 2023. There is a strong desire amongst educators to connect students with national cemeteries—students gain an understanding of the service and sacrifice of America’s Veterans, and an appreciation for the rich history of national cemeteries and the value of these cemeteries to the local community and the nation.

NCA undertook a multi-year program to restore the historic landscape at Beaufort National Cemetery. Due to iron in the irrigation system, the white marble headstones had sustained staining; and the large Live Oaks that give the cemetery its character had led to the degradation of the turf. While NCA explored the use of different products to clean the headstones (in conjunction with the NPS’s National Center for Preservation Technology and Training), it ultimately decided on a series of cleanings using traditional methods and the restoration of the turf with a species that could withstand the heat of the region and the shade of the Live Oak canopy.

As part of an existing MOA with the ACHP, Pennsylvania SHPO, NCA, and (32) consulting parties, NCA partnered with GSA to facilitate the transfer and disposition process for historic properties at Washington Crossing National Cemetery, PA. NCA funded the relocation of the Merrick Log House (ca. 1795) to be adjacent to the Scott Farm Complex (ca. 1815) and carved out 3 acres to be conveyed with the historic properties. NCA worked with GSA to determine the character-defining

features and to develop protective covenants that will run in perpetuity with the deed. GSA completed the disposition process in 2022. The property was conveyed to private ownership with protective covenants.

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. The VA Secretary, 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; it is located within an NHL district. Fort Sam Houston National Cemetery, TX, contains two government-issued headstones; the site is listed on the NRHP. In June, NCA began the consultation process based on its finding that proposed removal of the three headstones is an “adverse effect” to the historic cemeteries and two separate MOAs were executed (Fort Sam Houston, TX in December 2020 and Fort Douglas, UT in February 2022) with mitigation to resolve the adverse effect. In all, 21 VA cemeteries contain the graves of 970 WWI-WWII foreign POWs (German, Italian, Japanese) who died while interned in the United States. Interpretive signage has been installed at these properties to contextualize the circumstances of these graves. All three markers were removed and replaced with government-furnished white marble upright markers. The original markers remain in NCA custody and have

been entered into the NCA archival collection.

#### Opportunities:

Following upon the success of VA issuing its first applicant authorization pursuant to 36 CFR 800.2(c)(4) for its State Veterans Home Construction Grant Program in December 2019, VA issued a second applicant authorization during this reporting period. In October 2021, VA issued an applicant authorization for the Homeless Providers GPD Program. These issuances authorize a grant applicant to initiate Section 106 consultation for a specific project or program on VA’s behalf, allowing VA staff to focus their efforts more directly on projects with the potential to affect historic properties under VA’s jurisdiction.

Dayton National Cemetery, Ohio, began as part of the Central Branch of the National Home for Disabled Volunteer Soldiers and it opened in 1867 to house and care for Union Veterans of the Civil War. 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 the NTHP. Ball State University’s Department of

Architecture & Applied Anthropology Lab (Indiana) 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 by Ratio Architects Inc. 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.

The Mountain Home, TN VAMC is listed as an NHL. In 2016, the campus adopted a preservation plan that has served as a framework for project planning. The facilities department just completed a renovation on the most iconic building on campus, the clock tower building, updating the infrastructure of the building. It originally served as a mess hall. In Phase II, which has not yet started, VA will restore the original open interior format, and use that as clinical space for rehabilitation, prosthetics, and an orthotics lab.

At Mountain Home, VA is also renovating the Chapel. After years of condemnation, due to major structural foundation issues caused by a sinkhole, VA has shored up the foundation, and currently VA is completing a renovation of the Chapel interior and exterior, with plans to put the building back

into service as an active Chapel by the end of FY23.

Also at Mountain Home, VA is renovating Building 20, which originally served as a barracks. After the renovation, the building will be the campus police station. The campus is also renovating the quarters, by rehabilitating the exteriors, putting on new roofs, removing lead paint, and replacing damaged siding.

The Tuskegee, AL VAMC has multiple reuse projects in the planning stages. Building 18, which is currently vacant, is planned to be renovated and put back into use as a police station. Building 10, also vacant, will be renovated and used for a Whole Health Program and Telehealth Clinic.

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 the Denver, CO VAMC, which was determined NRHP eligible.

#### Opportunities – Partnerships:

In November 2022, leadership from VA’s CFM Office toured the National Building Museum and met with the ACHP acting Executive Director and Vice Chairman to discuss VA’s historic preservation goals and challenges.



**Figure 13: CFM leadership and HPO staff at the National Building Museum, formerly the Old Pension Office.**

VA has continued its partnership with the ACHP, sponsoring a liaison program analyst position since 2010. The VA liaison assists VA in compliance with Section 106 consultations, and in VA's responsibilities as a member of the ACHP.

Executive orders can impact VA's historic property portfolio. Per Executive Order 13781 (3/13/2017), the Department of Defense transferred 11 historic Army post cemeteries to NCA. These small and largely closed cemeteries are all eligible or listed on the NRHP. Five cemeteries were transferred to VA prior to 9/30/20 and were included in VA's last Section 3 report. The following cemeteries were transferred to VA after 10/1/20:

- Fort Stevens Cemetery, Hammond, OR
- Fort Worden Cemetery, Port Townsend WA

- Benecia Arsenal Cemetery, Benecia, CA
- Fort Devens Cemetery Devens, MA
- Fort McClellan Cemetery, Anniston, AL
- Fort McClellan POW Cemetery, Anniston AL

#### Challenges

VHA continues to face ongoing challenges in delivering medical care with aging infrastructure. The average age of VA's hospitals is approximately 60 years old, while the average private hospital is approximately 15 years old. In the future, VA anticipates that initiatives to modernize the VA infrastructure to meet the needs of 21<sup>st</sup> century Veterans will pose challenges to the preservation and continued use of VA's historic buildings.