



# U.S. ARMY

## CONSULTATION CONFERENCE #1:

# PROPOSED PROGRAM COMMENT FOR PRESERVATION OF PRE-1919 HISTORIC ARMY HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES



Controlled by: Headquarters, Department of the Army  
Controlled by: ASA IE&E  
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## **PURPOSE**

To inform stakeholder consultation regarding the proposed *Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features*.

## **CONSULTATION CONFERENCE #1 AGENDA**

- I. Background
- II. Introduction
- III. Goal, Objective, Summary
- IV. Intent
- V. Development Process
- VI. Outreach
- VII. Backup Information

\* Learn more about Department of the Army historic preservation and cultural resources by visiting [www.denix.osd.mil/army-cr/home/](http://www.denix.osd.mil/army-cr/home/).

## I. BACKGROUND

- **Reuters Special Report, Aug 16, 2018 “Children Poisoned by Lead on U.S. Army Bases”** Lead-based paint in historic Army housing identified as the source of the lead poisoning.
- **Army Housing Crisis** declared by Secretary of the Army, Jan 2019 Significant Army and Defense Senior Leadership and Congressional Member attention, widespread media reports of housing deficiencies, Congressional testimony from military family members indicating significant quality of life, health, and safety issues in historic housing.
- **Army Inspector General (IG) Report, 2019:** Historic Housing Findings – Historic housing is more costly to operate, maintain, and renovate; requires special historic building materials and craftsmen; health and safety concerns such as lead paint and asbestos are present; restrictive floorplans; the processes in 36 CFR 800 and the Programmatic Agreements (PAs) for historic housing are highly procedural, time consuming, with variable application of standards and results.  
**IG Recommendation:** Assess the feasibility of continuing the PAs for historic housing.  
**Army Leadership Response:** Develop a strategy to improve NHPA compliance for historic housing by implementing Army-wide programmatic compliance solutions.
- **Issues are ongoing today** with continued high-level concern from Congress, senior military leaders, and occupants of the housing.
- **Army Strategic Agenda for National Historic Preservation Act, Jul 2019** issued by the Assistant Secretary of the Army for Installations, Energy and Environment. Directs the Army Federal Preservation Officer to pursue Program Comments per 36 CFR 800.14(e) to address issues with PAs, comply with the NHPA in a more programmatic, Army-wide manner, and improve the quality of life, health and safety of the families living in historic housing.
- The proposed ***Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features*** continues strategy implementation building on the Program Comment for Vietnam War Era Historic Army Housing (1963-1975) approved by the ACHP in 2024, the Program Comment for Inter-War Era Historic Army Housing (1919-1940) approved in 2020, and the Program Comment for Army Capehart-Wherry Housing (1949-1963) approved in 2002.

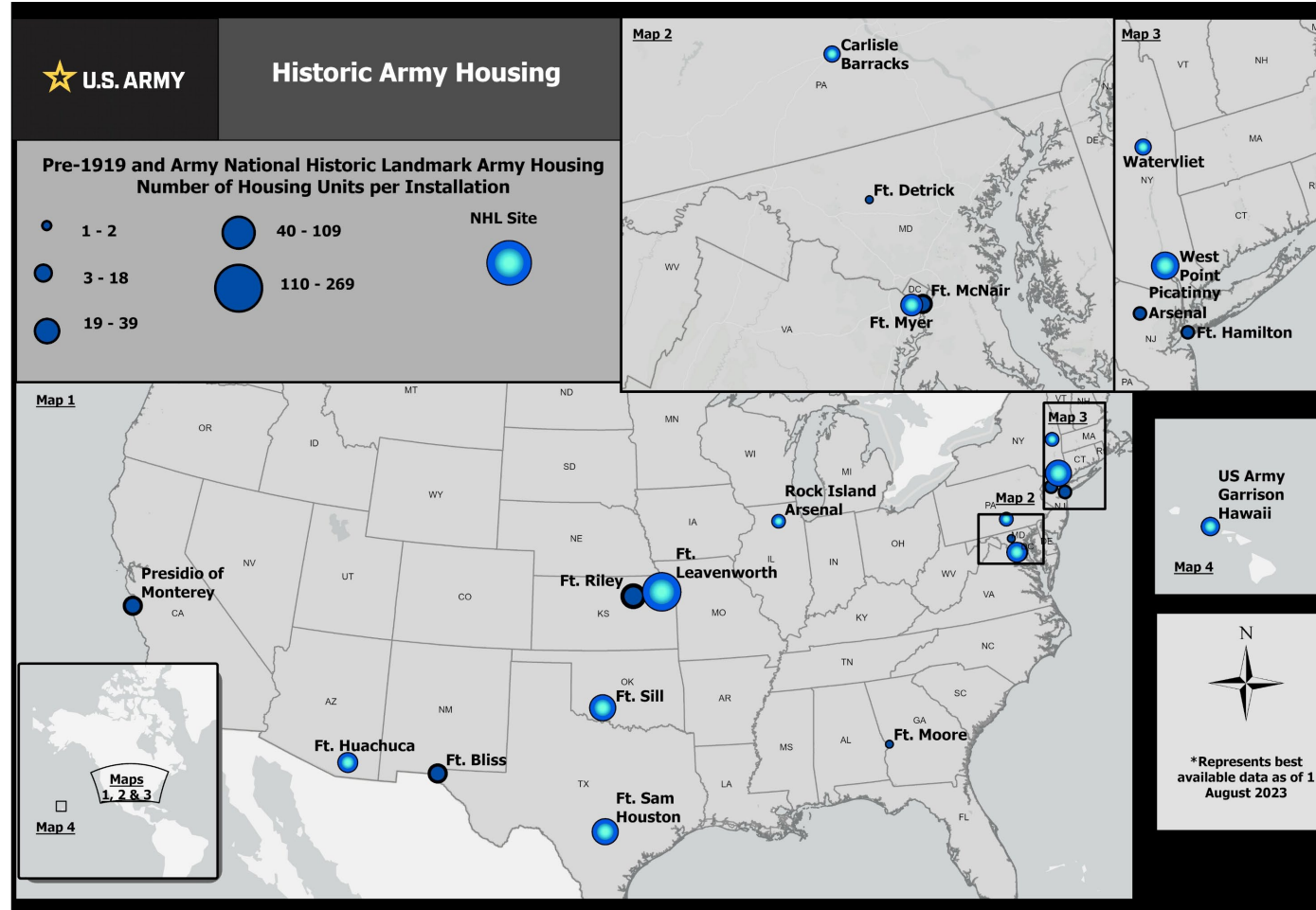
## I. BACKGROUND

- **15 June 2023**, the Assistant Secretary of the Army for Installations, Energy and Environment held a meeting at Fort McNair, Washington DC with other senior leaders to discuss pre-1919 Army housing NHPA compliance issues and program alternatives. Stakeholders present included the Assistant Secretary of Defense for Energy, Installations, and Environment; Assistant Secretary for Fish and Wildlife and Parks, Department of the Interior; Chairman, Advisory Council on Historic Preservation (ACHP); Chairman, National Capital Planning Commission; Associate Director, National Park Service (NPS); Executive Director, ACHP; and the Executive Director, National Conference of State Historic Preservation Officers (NCSHPO). There was general agreement among all stakeholders that a nationwide programmatic NHPA compliance approach to pre-1919 Army housing was necessary.
- **20 July 2023**, as a follow-up to the Ft McNair meeting the Army Federal Preservation Officer (FPO) held a consultation meeting with the ACHP Executive Director, NCSHPO Executive Director, and the NPS Associate Director to obtain their views on a program alternatives for programmatic treatment of pre-1919 housing for the Army's consideration.
- **24 August 2023**, the Army FPO again met with the ACHP, NPS, and NCSHPO to further discuss program alternatives for pre-1919 Army housing.
- **24 August 2023**, the Army FPO also had a separate discussion directly with the ACHP Executive Director regarding program alternatives.
- **19 September 2023**, the Army FPO officially notified the ACHP Executive Director of the Army's decision and intent to seek a program comment for its inventory of pre-1919 housing.
- **23 October 2023**, the Army initiated public participation for the Program Comment process (per 36 CFR 800.14(e)(2)), by publication of a Notice of Availability (NOA) in the Federal Register. The Federal Register NOA at 88 FR 72743 informed the public of the Army's intent to seek a Program Comment for pre-1919 housing from the ACHP and provided the Army Program Comment Plan for a 30-day public review and comment period. The Army FPO also reached out directly via email to over 850 NHPA stakeholders to ensure awareness of the Federal Register NOA and invite stakeholders to identify as interested parties and participate in weekly consultation conferences.

## II. INTRODUCTION

### PRE-1919 HISTORIC ARMY HOUSING:

- The Army has 865 pre-1919 homes at 18 installations in 14 states.
- Pre-1919 Army housing has greater historical significance than later most later Army housing.
- Over 70% of pre-1919 Army homes are in National Historic Landmark (NHL) Districts.



Installation	Pre-1919
Fort Leavenworth	269
Fort Riley	109
Fort Sam Houston	91
West Point	84
Fort Sill	73
Fort Bliss	39
Fort Huachuca	38
Presidio of Monterey	37
Fort Myer	34
Fort McNair	27
Carlisle Barracks	18
USAG Hawaii	17
Watervliet Arsenal	8
Rock Island Arsenal	6
Fort Hamilton	6
Picatinny Arsenal	6
Fort Detrick	2
Fort Moore	1
<b>Total</b>	<b>865</b>



## II. INTRODUCTION

- Federal Register Notice of Availability 88 FR 72743 and public review and comment on the Army Program Comment Plan from 23 October 2023 – 22 Nov 2023. Written comments are to be submitted to the Army Federal Preservation Officer at [david.b.guldenzopf.civ@army.mil](mailto:david.b.guldenzopf.civ@army.mil) during the Federal Register comment period.
- Stakeholder Consultation Conferences 08 Nov – 20 Dec 2023
- Consultation Conferences will occur with interested parties via TEAMS from 2:30-3:30 EST on each Wednesday of each week during the consultation period.
- TEAMS invitations will be sent to those who identify themselves as interested parties.
- Program Comment Consultation Conference Topics:
  - Consultation Conference #1: 08 Nov 23 - Introduction, Goal, Objective, and Development
  - Consultation Conference #2: 15 Nov 23 - Scope, Pre-1919 Housing Inventory, NHL Status
  - Consultation Conference #3: 29 Nov 23 - Category of Undertaking and Likely Effects
  - Consultation Conference #4: 06 Dec 23 - Approach and Methodology
  - Consultation Conference #5: 13 Dec 23 - Applicability, Effect, and Duration
  - Consultation Conference #6: 20 Dec 23 - Consultation Summary and Conclusion
- Consultation briefings are available to stakeholders in advance of each scheduled conference call on the Program Comment website: <https://denix.osd.mil/army-pre1919-pchh/>.

### **III. GOAL, OBJECTIVE, SUMMARY**

#### **Goal:**

The Army's goal for the program comment is to obtain programmatic compliance with the NHPA 54 USC 306108 for the repetitive management actions occurring on this large inventory of pre-1919 historic housing by means of the program alternative procedure under 36 CFR 800.14(e), in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7.

#### **Objective:**

The objective of the program comment is to achieve the goal in a manner that provides the appropriate balance between preservation of the housing and the efficient, consistent, and cost-effective management of the housing in order to improve of the quality of life, health, and safety of the Army families living in pre-1919 housing. The goal and objective will be met by the ACHP's adoption of the program comment, and the Army's implementation of the program comment management actions.

#### **Summary:**

The proposed Program Comment for Preservation of Pre-1919 Historic Army Housing implements a practical management-based approach to compliance with the National Historic Preservation Act (NHPA). It will improve NHPA process efficiency, minimize adverse effects, reduce costs, and manage pre-1919 housing at a higher standard of care while helping to improve the quality of life, health, and safety of the Soldiers and families living in the housing. The Army estimates that the program comment for pre-1919 housing will result in a savings of \$189.5 million during the first five years of implementation.

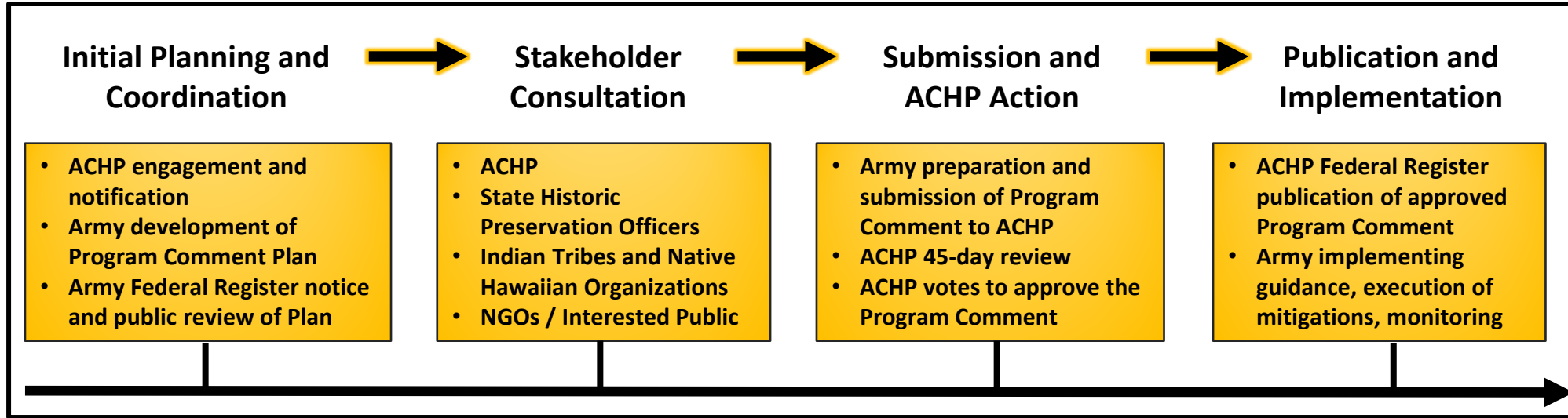
## **IV. INTENT**

The proposed *Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features* is intended to:

- Provide a higher standard of care for pre-1919 Army NHL housing and meets the requirements of NHPA Section 306107 by planning and taking necessary actions in a manner that minimizes harm to NHLs to the maximum extent possible.
- Address a category of undertakings termed *management actions* and recognizes that implementation of those management actions is not adverse and directly improves the material living conditions for military families living in pre-1919 housing while ensuring the historic character of the housing is preserved.
- Prioritize the quality of life, health, and safety of military families in balance with the preservation of pre-1919 housing. It is focused on preservation of this historic housing while addressing the effects that the historic preservation process may have on the people who live in and manage the housing. The material living conditions, financial impacts, and wellbeing of people are in the forefront as prevailing concerns for pre-1919 housing.
- Recognize that intensifying climate risks require the use of modern climate resilient imitative substitute building materials, and that the use of these materials helps ensure the Army's pre-1919 housing will be sustainable into the future.
- Recognize that standardized plans developed by the Army Quartermaster Corps following civilian architectural designs were used in the construction of pre-1919 housing and that similar designs, plans, building materials, and construction methods were used in the construction of comparable homes built in the private sector during this same time.
- Include treatment measures including a building materials selection criteria and procedures, Design Guidelines, and a Building Materials Catalog, in addition to extensive historical documentation and recordation of the original plans and designs of pre-1919 Army housing.
- Properly calibrate actions to the NHL significance of pre-1919 housing and provide long-term preservation by ensuring that the housing will be a mission-supporting real property asset.



## V. ARMY PROGRAM COMMENT DEVELOPMENT PROCESS



- The Army is following a four-phase program comment development process as it has for our prior program comments.
- The Army’s consultation is consistent with the intent and meaning of consultation in the Section 106 process as defined in 36 CFR 800.16(f). The Army will seek, discuss, and consider the views of all participants in the program comment consultation process and, where feasible, seek agreement with them regarding matters arising during the consultation.
- The Army is planning to submit the program comment to the ACHP on or about 31 January 2024, for ACHP action in accordance with 36 CFR 800.14(e)(5).

## VI. OUTREACH

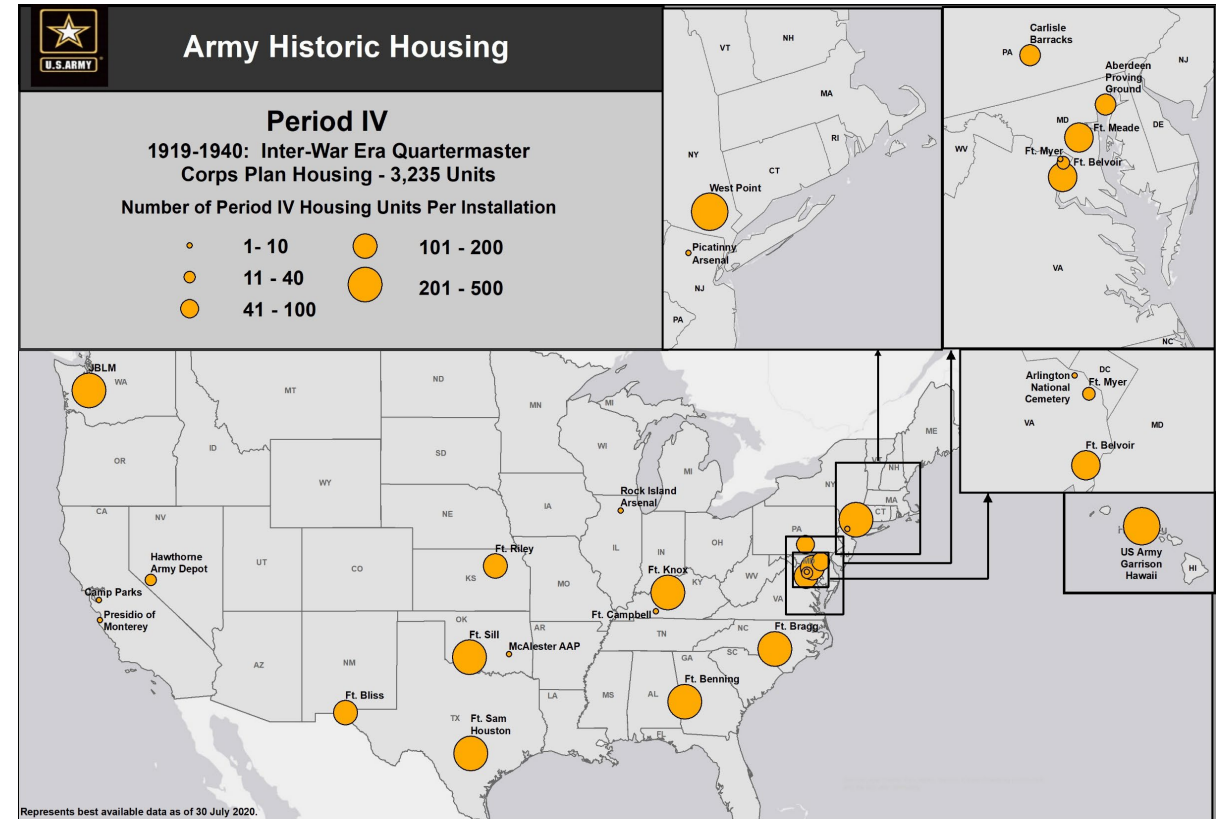
The Army has developed the following public websites and social media issuances to facilitate consultation and outreach to the public:

- **ARMY HISTORIC PRESERVATION AND CULTURAL RESOURCES MANAGEMENT** [www.denix.osd.mil/army-cr/home/](http://www.denix.osd.mil/army-cr/home/) The public web page for Department of the Army Historic Preservation and Cultural Resources Management.
- **PROGRAM COMMENT FOR PRE-1919 HISTORIC ARMY HOUSING** <https://denix.osd.mil/army-pre1919-pchh/>. The public webpage for the Army Pre-1919 Historic Housing Program Comment.
- **PROGRAM COMMENT FOR ARMY INTER-WAR ERA HISTORIC HOUSING** [www.denix.osd.mil/army-pchh/](http://www.denix.osd.mil/army-pchh/) The public webpage for the Army Inter-War Era Historic Housing Program Comment.
- **PROGRAM COMMENT FOR ARMY VIETNAM WAR ERA HISTORIC HOUSING** <https://www.denix.osd.mil/army-vwehh-pc/> The public webpage for the Army Vietnam War Era Historic Housing Program Comment.
- **X (aka TWITTER):** <https://twitter.com/DENIXnews> The Army secretariat releases monthly Army historic preservation-related Tweets.

## VII. BACKUP INFORMATION

## PROGRAM COMMENT FOR INTER WAR ERA HISTORIC HOUSING 1919-1940, 3,235 HOMES

- Approved by the ACHP on 4 Sep 2020, the Program Comment concludes NHPA compliance for the Army's inventory of housing, associated buildings and structures, and landscape features from 1919-1940.
- Provides Army-wide NHPA compliance for these **management actions**: maintenance, repair, rehabilitation, renovation, abatement, mothballing, demolition, replacement construction, new construction, lease and conveyance.
- This Program Comment introduced programmatic application of **imitative substitute building materials\*** resulting in renovation cost savings in the millions of dollars while maintaining the historic character of the housing.
- The Program Comment is in effect through 2055, in synch with privatized housing ground leases.



\* **Imitative substitute building materials** are modern, industry standard, natural, composite, and synthetic materials that simulate the appearance of and substitute for more costly historic building materials and in-kind building materials.

## PROGRAM COMMENT FOR CAPEHART-WHERRY HOUSING 1949-1962, 18,483 HOMES

- The first Program Comment proposed by Army and approved by ACHP (May 2002) was for Capehart-Wherry Housing. Concludes NHPA compliance for all housing, associated buildings and structures, and landscape features built from 1949-1962. This Program Comment supported NHPA compliance for the initial privatization of Army Family Housing.
- Concludes Army-wide NHPA compliance for **management actions**: maintenance, repair, rehabilitation, renovation, mothballing, demolition, replacement, transfer, sale, lease.
- This Program Comment is in effect until the Army determines it is no longer needed.

