



DEPARTMENT OF THE ARMY  
THE ASSISTANT SECRETARY OF THE ARMY  
INSTALLATIONS, ENERGY AND ENVIRONMENT  
110 ARMY PENTAGON  
WASHINGTON DC 20310-0110

March 1, 2024

Honorable Sara Bronin  
Chairman, Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Dear Ms. Bronin,

The purpose of this correspondence is to submit the Department of the Army's (Army) enclosed *Program Comment for the Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features* (program comment) to the Advisory Council on Historic Preservation (ACHP). In accordance with 36 CFR 800.14(e)(5), the Army requests ACHP action on this program comment within 45 days of your receipt of this submission.

The intent of the program comment is to address the Army's National Historic Preservation Act (NHPA) Section 106 compliance requirements for our nation-wide inventory of over 865 pre-1919 homes in a manner that balances historic preservation requirements with our responsibility to provide the military families with the quality of life, health, and safety they require and deserve. This program comment is the Army's nationwide programmatic NHPA compliance solution to longstanding pre-1919 housing issues. The program comment identifies the category of undertakings, specifies the likely effect on historic properties, specifies steps to ensure the effects are taken into account, and identifies the time period and duration of the program comment. Also enclosed is the *Administrative Record* for the program comment containing the views submitted by the public regarding this action.

This program comment is consistent with and implements the *Secretary of the Interior's Standards for Rehabilitation* (36 CFR 68.3(b)), and its effect on the Army's inventory of pre-1919 housing is *not adverse*. The program comment is responsive to Army Inspector General findings and recommendations pertaining to historic housing and ensures that the economic and technical feasibility of each project is considered as required by the *Secretary of the Interior's Standards for Treatment of Historic Properties* at 36 CFR 68.3. This program comment implements a standardized approach and systematic methodology for building materials selection. It contains design guidelines and building materials guidelines to support the building materials selection process. Qualified preservation professionals will assist implementation. This program comment in its entirety minimizes harm and manages pre-1919 National Historic Landmark (NHL) housing to a higher standard of care.

Mitigation documentation has been prepared for pre-1919 Army housing and is available to the public at the program comment website <https://www.denix.osd.mil/army->

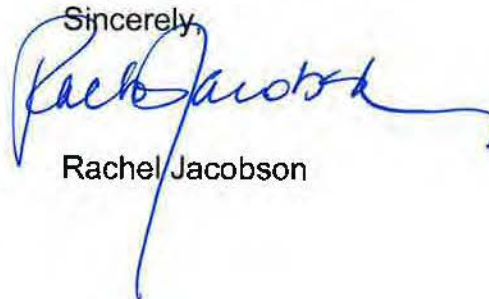
[pre1919-pchh/](#). The mitigation measures include extensive documentation and analysis of original Army Quartermaster Corps designs and floorplans for pre-1919 Army housing, historic context information, and Historic American Building Survey (HABS) documentation of pre-1919 Army housing.

Beginning in June 2023, the Army implemented an extensive planning, public participation, and consultation process for the program comment that is thoroughly documented in the *Administrative Record*. The Army's public participation and consultation process sought, discussed, and considered the views of all consulting parties regarding the program comment plan and where feasible, the Army reached agreement with consulting parties, implemented changes, and took additional actions regarding numerous matters arising during the consultation. For example, as a result of the consultation process the Army requested ACHP's views on the finding that the program comment's effect is *not adverse*, requested and incorporated National Park Service comments on a draft of the program comment including comments regarding NHLs, revised and clarified the building materials selection procedure, added preservation tax credit consideration into the building materials selection process, refined and clarified language pertaining to transfer, sale and lease of the housing, added qualified professional assistance and monitoring for program comment implementation, revised and expanded the *effects* discussion, expanded the discussion on NHLs, and made numerous detailed technical changes to the design guidelines and the building materials guidelines in appendices A and B.

The Army's nationwide outreach effort afforded the public and interested parties the opportunity to express their views on all aspects of the proposed program comment. The Army Federal Preservation Officer also kept ACHP staff informed on the progress, scope, and content of the program comment and coordinated a series of drafts of the program comment with ACHP staff during its development. Additionally, on January 10, 2024, the Army participated in a discussion of the program comment during the ACHP Regulations and Governance Committee meeting.

My point of contact for action is Dr. David Guldenzopf, Army Federal Preservation Officer, at [david.b.guldenzopf.civ@army.mil](mailto:david.b.guldenzopf.civ@army.mil), 703 459-7756. Thank you for your continued support and interest in the care and well-being of our Soldiers and their families.

Sincerely,



Rachel Jacobson

Enclosures