



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

September 23, 2019

Mr. Paul Edmonson  
President,  
National Trust for Historic Preservation  
Suite 1100  
2600 Virginia Ave., NW  
Washington, DC 20037

Dear Mr. Edmonson:

I am writing to initiate consultation with the National Trust for Historic Preservation (NTHP) regarding the Department of the Army's intent to request a *Program Comment for Army Inter-War Era Historic Housing 1919-1940* from the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR 800.14 (e). The Program Comment for Army Inter-War Era Historic Housing will address critical issues that directly affect the quality of life, health, and safety of military families that live in this historic housing.

The intent of the Program Comment is to improve the quality of life, health, and safety of military families, increase property management efficiency and effectiveness, and preserve the historical and architectural character of this housing by meeting our National Historic Preservation Act (NHPA) Section 106 requirement in a programmatic manner. The Army believes a Program Comment is the best NHPA compliance solution for this category of historic property.

The Program Comment issued by the Council for Army Capehart-Wherry Housing 1949-1962 is the precedent for addressing the Army's large inventory of historic housing. Similar to Capehart-Wherry, Army Inter-War Era housing 1919-1940 represents a large inventory of similar historic property types with 2,709 housing units primarily comprised of Colonial Revival style housing located on 35 Army installations. Construction of this housing followed standardized plans adopted from civilian architectural designs and such housing is commonplace in the civilian sector.

Army Inter-War Era housing is subject to a large number of frequent and repetitive undertakings. Similar to the Capehart-Wherry Program Comment, the category of undertaking for the Army Inter-War Era Historic Housing Program Comment is *management actions: maintenance, repair, rehabilitation, renovation, mothballing,*

*demolition, replacement, transfer, sale, and lease.* These actions present a potential for adverse effects.

The Army's proposed Program Comment treatment measures for Army Inter-War Era historic housing will ensure the effects of our management actions are taken into account. The proposed treatment measures include a revised and expanded Army Inter-War Era Housing historic context that will provide a significant contribution to architectural history scholarship. The Army will identify Inter-War Era historic housing that may be of particular importance and warrant additional preservation measures. The Army will develop Design Guidelines for Inter-War Era Historic Housing 1919-1940 to identify the design elements that define the historical and architectural character of the housing and its setting. To address health and safety risks to military families living in historic housing due to potential hazards such as lead-based paint and to address the high costs associated with use of "in-kind" materials, the Army will implement its management actions using modern industry standard and imitative materials that closely match defining design elements identified in the Design Guidelines. The Army will develop public educational materials and distribute those materials via social media and other means. The Army will also monitor implementation of the Program Comment treatment measures to ensure effectiveness.

The Army's timeline for the Program Comment for Inter-War Era Historic Army Housing 1919-1940 began with our notification to the Council on September 19, 2019 of our intent to request a Program Comment. By means of this letter, the Army is formally requesting consultation with the NTHP on the Program Comment. I contacted Ms. Betsy Merritt of your staff by email on September 20, 2019 to schedule an initial consultation meeting. The Army intends to make its request for Program Comment to the Council in July 2020.

Thank you for your support and interest in the care and well-being of our Soldiers and their families.

Sincerely,

A handwritten signature in black ink, appearing to read "David Guldenzopf". The signature is fluid and cursive, with the first name "David" being more prominent.

David Guldenzopf, Ph.D.  
Department of the Army  
Federal Preservation Officer