



CLEARED
For Open Publication
Feb 13, 2017

Department of Defense
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

2022 ANNUAL REPORT

PROGRAM COMMENT FOR DEPARTMENT OF THE ARMY INTER-WAR ERA HISTORIC HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES (1919-1940)

Submitted by:

Department of the Army Federal Preservation Officer, Office of the Assistant Secretary of the Army for Installations, Energy and Environment

Submitted to:

Executive Director, Advisory Council on Historic Preservation

Submission Date: January 3, 2023

Table of Contents

I.	Introduction	3
II.	Inter-War Era Housing Historic Context.....	8
III.	Design Guidelines and Building Materials Catalog.....	9
IV.	Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure Professional Assistance, Oversight, and Monitoring	10
V.	Summary of 2022 Application of Building Materials Selection Criteria, Procedures, and Application of Demolition Procedures.....	12
VI.	Army Federal Preservation Officer National Historic Landmarks Memorandum for Inter-War Era Housing.....	21
VII.	Army Program Comment Website Activities.....	21
VIII.	Public Education/Social Media Activities.....	22
IX.	Building Materials Lifecycle Data	29
X.	Summary Review.....	30
XI.	Army Inter-War Era Housing Program Comment Success Story	31

I. Introduction

The goal of the *Program Comment for Department of the Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940)* (Program Comment) is to achieve programmatic compliance with the National Historic Preservation Act of 1966 54 USC 306108 (Section 106) for repetitive management actions to this large inventory of similar property types through the program alternative procedure authorized under 36 CFR 800.14(e) in lieu of individual project reviews under 36 CFR 800.4 through 800.7. 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 Inter-War Era housing. The Department of the Army (Army) believes that goal and objective have been met by the Advisory Council on Historic Preservation’s adoption of the Program Comment, and the Army’s implementation of the Program Comment management actions and mitigation measures as summarized in this Annual Report.



Figure 1: Fort Bragg

The Program Comment enables the Army to implement management actions in an efficient, consistent, and cost-effective manner. These actions in turn improve the quality of life, health, and safety for the Army families living in Inter-War Era housing and help ensure that the inventory of Inter-War Era historic housing will continue to function as a viable and sustainable

real property asset. Efficient, consistent, and cost -effective management provided by the Program Comment has improved the quality of life, health, and safety for military families living in the housing and ensured the housing is a mission-supporting real property asset, while maintaining the character-defining features of the resource and their continued historical use as housing.

The Program Comment establishes procedures and requirements that address the Army’s NHPA compliance responsibilities for its nation-wide inventory of over 3,200 Inter-War Era housing units. It successfully balances historic preservation requirements with the well-being of thousands of military families who live in this historic housing. The management actions addressed by this Program Comment directly improve the material living conditions of the Army’s Soldiers and families who live in Inter-War Era housing, while the treatment measures ensure the historic and architectural character of this housing is maintained.



Figure 2: Fort Knox

The Army maintains the largest inventory of historic housing in the Federal government. The Army has an obligation to manage historic housing in compliance with the NHPA, in balance with the safety and well-being of military families that occupy Army housing. The Army’s obligation to military families and its NHPA responsibilities present unique and significant challenges.



Figure 3: Fort Riley

The Army must provide for the quality of life for Soldiers and their families; manage high maintenance, repair, and rehabilitation costs for historic housing; address historic building materials that present lead-based paint, asbestos, and other health hazards to housing occupants; address the need for additional bedrooms and expanded living space, kitchen and bathroom improvements, modernization of heating and ventilation systems, and modernization of plumbing and electrical systems; and rapid repair and turn around homes for reassigned military families; all while preserving the historic and architectural character of the housing. The magnitude of this challenge led the Army to develop holistic and cost-effective strategies for compliance with Section 106 of NHPA. The Army's *Program Comment for Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940)* was developed in partnership with the ACHP to meet this uniquely Army challenge.



Figure 4: Fort Sill

The Program Comment was formally adopted by the ACHP on 4 September 2020 and establishes a new paradigm for integration of historic preservation treatments as part of the solution to the Army's most critical military family housing concerns.

The 2022 Annual Report:

The 2022 Annual Report is provided in fulfillment of Section 5.1 of the Program Comment. The 2022 Program Comment reporting period runs from 1 January 2022 through 31 December 2022. This Annual Report summarizes actions undertaken by the Army in 2022 in the implementation of the Program Comment. These actions include treatment measures specified in the Program Comment.

The Program Comment defined treatment measures for management actions applicable to Army housing, associated buildings and structures, and landscape features constructed during the Inter-War Era (1919-1940). The management actions addressed include: maintenance, repair, rehabilitation, renovation, abatement, mothballing, demolition, replacement construction, new construction, and lease and conveyance of Inter-War Era properties. The Program Comment supersedes and replaces installation Programmatic Agreements, Memoranda of Agreement, and any procedures, development agreements, lease and conveyance documents, environmental management plans, guidelines, reporting requirements, Integrated Cultural Resources Management Plans, and any and all other installation documents, standards, procedures, or

guidelines pertaining to the preservation and management of Army Inter-War Era housing, associated buildings and structures, and landscape features. The Program Comment applies to all Army Inter-War Era housing, including privatized housing managed under the Army's Residential Communities Initiative, and housing that remains Army-managed family housing, with exceptions noted.



Figure 5: Fort Bliss

The Program Comment identifies treatment measure for the management of the Army's Inter-War Era housing. Section 5.1 of the Program Comment mandates annual reporting on those treatment measures. The treatment measures subject to reporting are:

- Inter-War Era Historic Context
- Design Guidelines and Building Materials Catalog
- Design Guidelines Professional Assistance and Monitoring Activities
- Army Federal Preservation Officer (FPO) Policy Memorandum for Inter-War Era National Historic Landmarks
- Army's Inter-War Era Housing Program Comment Website Activities
- Public Education/Social Media Activities
- Imitative Substitute Materials Lifecycle Data Provisions Reporting

Program Comment Section 5.1 requires that annual reports be submitted by the Army to the ACHP by 31 January of each year from 2021 to 2025.



Figure 6: Fort Campbell

II. Inter-War Era Housing Historic Context

The *Army Inter-War Era Housing Historic Context* was prepared to support the *Program Comment for the Department of the Army Inter-War Era Historic Housing, Associated Buildings, and Landscape Features (1919-1940)*, adopted by the ACHP on 4 September 2020. Submitted to the ACHP in June 2021, the historic context addressed five research objectives:

- To expand the existing Inter-War Era housing historic context information
- To address precedents for the U.S. Army Quartermaster Corps Inter-War Era housing styles
- To examine Army Inter-War Era housing design in the context of architectural design in the civilian sector
- To further describe the architectural styles present in the Army's inventory of Inter-War Era housing, and
- To examine Army Inter-War Era housing in the context of social and economic changes during the Inter-War Era

The historic context provided an overview of the military history of the Inter-War Era. The Army's Inter-War Era housing program evolved to address major restructuring of the Army and its installations and the need to remedy the poor condition of family housing following World War I.

The context addressed the beginning of the Army housing program after the end of World War I, and its proposed ten-year plan to construct family housing between 1926 and 1932. Funding to construct family housing became available from emergency relief funding through the Public Works Administration and the Works Progress Administration after 1933. The historic context addressed the role of the U.S. Army Quartermaster Corps in the design and construction of family housing in comparison to the trends in the civilian housing market. The increasing role of government intervention in the housing market also was discussed. The historic context provided an in-depth analysis of the Army's family housing construction program, including the housing types and architectural styles.

III. Design Guidelines and Building Materials Catalog

Section 3.2.2 *Design Guidelines, Building Materials Catalog, and Building Materials Selection Criteria and Procedures for Army Inter-War Era Housing* of the Program Comment requires the Army to carry out Inter-War Era housing management actions in a manner that ensures that the historic and architectural character of Inter-War Era housing is maintained. This requirement is stipulated under Program Comment Section. The schedule for treatment measures in Section 6.b. of the Program Comment states that the Design Guidelines and Building Materials Catalog are to be complete on date of issuance of the Program Comment. These documents were finalized on 4 September 2020, at the time of ACHP issuance of the Program Comment and are included as Appendices A and B in the Program Comment. The Design Guidelines and Building Materials Catalog are, along with the complete text of the Program Comment, posted on the Army's Program Comment [website](#).



Figure 7: Aberdeen Proving Ground

Design Guidelines:

The Design Guidelines provide guidance for the treatment of all Army Inter-War Era housing and associated buildings, structures, and landscape features. Application of the Design Guidelines in decision making ensures that historic materials and character-defining architectural features of Inter-War Era housing, associated buildings, structures, and landscape features are managed within the requirements of the Program Comment. The Design Guidelines establish treatment parameters for the overall shape, style and design of the buildings, decorative details, interior spaces and features, as well as treatment parameters for associated landscape features.

Building Materials Catalog:

The Building Materials Catalog establishes a methodology for selecting building materials for use in the rehabilitation or renovation of Army Inter-War Era housing that maintain the historic and architectural character of this class of resource. Catalog entries are organized to correlate with major building components and include foundations, walls, roofing, porches, windows, entries, landscape elements, and interior features. Design considerations developed for each entry include location, type, size, finish, and maintenance; guidance for the consideration of in-kind and imitative materials in building management is provided when replacement of historic building materials is required. Emphasis is placed on retention of the design integrity of the historic property. It is anticipated that the types of imitative materials addressed in the Building Materials Catalog will be expanded, as acceptable new building materials are introduced on the market, and in consultation with the ACHP as defined in Section 8.0(b). Any amendments to the Building Materials Catalog will be posted on the Army's website.

IV. Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure Professional Assistance, Oversight, and Monitoring Activities

For over 15 years, the Army's privatized housing partners operated and maintained Army Inter-War Era housing under installation-level NHPA Programmatic Agreements, prior to the ACHP adoption of the Program Comment in 2020. The Army's privatized housing partners have extensive experience and expertise in managing historic housing in accordance with the NHPA. Nonetheless, professional assistance, oversight, and monitoring activities are stipulated under Program Comment Section 3.2.2.5 *Ensure management actions follow the Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure*. In the 2022 reporting period, professional assistance, oversight, and monitoring for application of the Design Guidelines, Building Materials Catalog, Building Materials Criteria, and Building Materials Selection Procedure, along with overall application of the Program Comment were completed by the Army. These actions included formal Army-wide outreach and training events with commands, installations, and privatized housing partners and the establishment by the Army Federal Preservation Officer (FPO) of a contract to provide direct, on-call (telephonic and electronic) and on-site professional assistance and technical

support to installations and privatized housing partners. The Army FPO directly engaged in the development, implementation, oversight, and monitoring of all of these actions. On-site professional assistance and technical support visits were planned during the 2021 reporting period but were postponed due to COVID-19 pandemic precautions and restrictions. The Army FPO commenced on-site professional assistance and technical support visits in 2022. Formal training on the implementation of the Program Comment was supplemented by on-call historic preservation professional assistance and technical support from a qualified contractor, R. Christopher Goodwin & Associates, Inc. (RCG&A).



Figure 8: Joint Base Lewis McChord

The contact information for RCG&A was distributed to all installations and privatized housing partners managing Inter-War Era housing. Professional assistance and technical support from RCG&A include direct, on-call telephonic and electronic access to these qualified historic preservation professionals to address installation-specific questions regarding the implementation of the Program Comment, and application of all criteria and procedures contained therein within 24 hours.

Overall, the totality of these activities ensures installations and Army privatized housing partners with Inter-War Era housing fully implement all provisions of the Program Comment including the Design Guidelines, Building Materials Catalog, the Building Materials Selection Criteria and

Selection Procedure, and the building demolition criteria and procedures. The Army has made the



Figure 9: New replacement imitative substitute windows at Joint Base Lewis McChord

Design Guidelines and Building Materials Catalog publicly available on the Army's Inter-War Era Housing Program Comment website, ensured the availability of historic preservation professional assistance for *Design Guidelines and Building Materials Catalog* implementation, and monitored and reported on the implementation of the Design Guidelines, and Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure. The Army FPO has maintained oversight and monitored Design Guideline and Building Materials Catalog implementation, in full compliance with Program Comment Section 3.2.2.5.

V. Summary of 2022 Technical Support Provided for Application of Building Materials Selection Criteria and Procedures, and Application of Demolition Procedures

Site Specific Summary of 2022 of Technical Support for Application of Building Materials Selection Criteria and Procedures:

The Program Comment criteria for building materials selection are: When health and safety of military families is of concern, or when the initial or on-going use of historic building materials and in-kind building materials impacts the Army's ability to fully implement quality of life improvements to housing for military families, imitative substitute building materials will be

considered for use only in a manner that maintains the historic and architectural character of the historic housing and when consistent with the results of the following building materials selection procedure. During the 2022 Program Comment reporting period (1 January 2022 – 31 December 2022), the following site assistance visits provided by the support contractor regarding application of the building materials selection criteria and procedures occurred.

Site assistance visits to select Inter-War Era installations were undertaken in 2022 to provide a refresh of information and overview of the Program Comment, and any technical assistance with the Building Materials Catalog, Design Guidelines, as needed. The following installations were visited:

- **Fort Benning, GA** Fort Benning contains the largest concentration of Army Inter-War Era housing—492 units. These units are in four distinct housing areas—Indianhead Village, Iron Triangle, McDonalds, and Rainbow Row. Unit types include single-family and duplex residences.

The technical support session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. Fort Benning currently does not have plans to demolish any Inter-War Era housing units.

Next, the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. Finally, a tour of the Inter-War Era neighborhoods was undertaken, and photographs were taken of units and streetscapes. Fort Benning currently is undergoing the replacement of historic windows in Inter-War Era units with imitative substitute units. There are no further anticipated projects.

- **Aberdeen Proving Ground, MD** APG has 97 units of Inter-War housing. Most Inter-War housing in APG North is sited on Plum Point around the former parade ground near the Chesapeake Bay. Another five units are located along Naylor Street. APG South (formerly Edgewood Area) has three separate groups of Inter-War housing located along Everette, Brigade, and Corporal Streets. Unit types include single-family and duplex residences.

The technical support session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines,

Building Materials Catalog, demolition procedures, and reporting requirements. No demolition of Inter-War Era housing units currently is planned at APG. An electronic copy of the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. The Housing Partner specifically requested support on the topic of substitute slate for one leaking roof and potential future roof replacements.

The meeting was followed by a tour of specific projects for Inter-War housing in APG North. No projects are planned in the short term for Inter-War housing in APG South. Projects reviewed included 6241 Plum Point Loop, which represented a completed medium renovation; 6757 Plum Point Drive, which is experiencing a continuous leaking roof; 6262 Plum Point Loop, which is scheduled for new windows in the near future; and, 6686 Naylor Circle, which represented a major renovation of a former duplex into a single-family house. Photographs were taken of units and buildings.

- **Fort Bliss, TX** Most Inter-War housing at Fort Bliss is located in the Red Brick neighborhoods. Some units are located in the Beaumont neighborhood. Unit types are single-family.

The technical support session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. No demolition of Inter-War Era housing units currently is planned at Fort Bliss. An electronic copy of the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner.

The meeting was followed by a tour of specific projects for Inter-War housing at Fort Bliss. Photographs were taken of units and buildings. Currently, there are plans to renovate the Red Brick housing units including interiors and exteriors. The Housing Partner developed a guide to what materials are to be used, in accordance with the Program Comment. Half of the Red Bricks have undergone roof replacements; their red clay tile roofs have been replaced with an imitative substitute metal material.

- **Fort Bragg, NC** Fort Bragg has two neighborhoods comprising Inter-War Era family housing: Normandy/Bastogne Gables and Pope. RCG&A began this site visit with a brief overview of the purpose of the Program Comment followed by site visits to the Inter-War Era neighborhoods. These neighborhoods fully were walked to gather comprehensive photographs of units and landscape features, to understand building chronology, and to discuss common maintenance issues at these dwellings. Dwellings at these neighborhoods generally were two-

story, single-family units employing a Spanish Colonial style. Corvias stated that no Inter-War Era housing units had been modified applying the Program Comment at this time.

The technical support session was undertaken the following morning to accommodate staff availability. This session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. Fort Bragg currently does not have plans to demolish any Inter-War Era housing units. This technical support session included a question-and-answer component where select character defining features for Fort Bragg Inter-War Era family housing units were reviewed and appropriate substitute materials were discussed.

Next, the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. Personal contact information for RCG&A support also was provided for ongoing assistance in applying the Program Comment.

- **Fort Campbell, KY** Fort Campbell has 1 unit of Inter-War housing that was extant at the time of accessioning the land for the post. The property is the Durrett House constructed in 1932-1933 in the Cole Park neighborhood.

The technical support session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. No demolition of the Inter-War Era housing unit currently is planned at Fort Campbell. An electronic copy of the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. The meeting was followed by a tour and photographing of the Durrett House at Fort in the Cole Park neighborhood.

- **Carlisle Barracks, PA** RCG&A began this site visit with Carlisle Barracks Homes with a brief overview of the purpose of the Program Comment. The Program Comment was reviewed through a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements.

Carlisle Barracks Homes has integrated the Program Comment, including design guidelines and material catalog into historic property management protocols. No issues or concerns over the implementation of the Program Comment or reporting requirements were raised by the RCI partner.

- **Fort Belvoir, VA** RCG&A began this site visit with Carlisle Barracks Homes with a brief overview of the purpose of the Program Comment. The Program Comment was reviewed through a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements.

The Michaels Organization, the housing partner at Fort Belvoir, has integrated the Program Comment, including design guidelines and material catalog into historic property management protocols. No issues or concerns over the implementation of the Program Comment or reporting requirements were raised by the RCI partner.

- **Fort Knox, KY** RCG&A began this site visit with the Installation Environmental Division Chief and the Cultural Resources Manager accompanying RCG&A for a walk-through of the Inter-War Era neighborhoods. These neighborhoods were fully walked, photographs of units and landscape features were taken, and common maintenance issues at these dwellings was discussed. The housing in these neighborhoods are two-story, single-family units employing a Colonial Revival style.

The technical support session was undertaken following an introductory meeting with Lendlease representative. This session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. Fort Bragg currently does not have plans to demolish any Inter-War Era housing units. This technical support session included a question-and-answer component where select character defining features for Fort Bragg Inter-War Era family housing units were reviewed and appropriate substitute materials were discussed. No issues were reported.

Next, the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. Personal contact information for RCG&A support also was provided for ongoing assistance in applying the Program Comment.

- **Fort Riley, KS** Fort Riley has several neighborhoods comprising Inter-War Era family housing. RCG&A began this site visit with a brief overview of the purpose of the Program Comment followed by site visits to the Inter-War Era neighborhoods. These neighborhoods fully were walked, photographs of units and landscape features were taken, and common maintenance issues at these dwellings was discussed. Dwellings at these neighborhoods generally were two-story, single-family or duplex units employing a Revival style.

The technical support session was undertaken the following morning to accommodate staff availability. This session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. Fort Riley currently does not have plans to demolish any Inter-War Era housing units. This technical support session included a question-and-answer component where select character defining features for Fort Riley Inter-War Era family housing units were reviewed and appropriate substitute materials were discussed. No issues were reported.

Next, the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. Personal contact information for RCG&A support also was provided for ongoing assistance in applying the Program Comment.

- **Fort Sill, OK** RCG&A began this site visit with a brief overview of the purpose of the Program Comment followed by site visits to the Inter-War Era neighborhoods. These neighborhoods fully were walked to gather comprehensive photographs of units and landscape features, to understand building chronology, and to discuss common maintenance issues at these dwellings. Dwellings at these neighborhoods generally were two-story, single-family or duplex units employing a Spanish Colonial style. Corvias stated that just one Inter-War Era housing units had been modified applying the Program Comment at this time: a bathroom vent fan unit.

The technical support session included a brief overview of the PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. Fort Sill currently does not have plans to demolish any Inter-War Era housing units. This technical support session included a question-and-answer component where select

character defining features for Fort Sill Inter-War Era family housing units were reviewed and appropriate substitute materials were discussed. No issues were reported.

Next, the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. Personal contact information for RCG&A support also was provided for ongoing assistance in applying the Program Comment.

- **Joint Base Lewis McChord, WA** JBLM has 330 units of Inter-War housing. The technical support session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. No demolition of the Inter-War Era housing unit currently is planned at Fort Campbell. An electronic copy of the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. The meeting was followed by a tour and photographing of the Inter-War Era Housing on site. JBLM effectively applied the Program Comment for window replacements reported in the 2021 Annual Report. No issues were reported.
- **USAG Hawaii, HI** USAG Hawaii’s Schofield Barracks is located on the island of Oahu in Honolulu County, were the focus of this current investigation. Schofield Barracks includes 17,482.26 acres and was established in 1909. Schofield Barracks contains 386 units of Inter-War Era housing.

The technical support session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. An electronic copy of the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. The meeting was followed by a tour and photographing of the Inter-War Era neighborhoods, particularly Canby Field where a new community center is planned on an open field utilizing New Construction guidelines from the Program Comment. No issues were reported.

- **Presidio of Monterey, CA** The Naval Postgraduate School has four Inter-War Era historic dwelling units. RCG&A began this site visit with a brief overview of the purpose of the Program Comment followed by site visits to the Inter-War Era neighborhood. These dwelling

units fully were walked, including interior access where granted, to gather comprehensive photographs of units and landscape features, to understand building chronology, and to discuss common maintenance issues at these dwellings. Dwellings at these neighborhoods generally were one- to two-story, single-family and duplex units employing a Spanish Colonial style. The Michaels Organization stated that no Inter-War Era housing units had been modified applying the Program Comment at this time. Dwelling units were renovated in 2010.

The technical support session was undertaken later in the week to accommodate staff availability. This session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements. The Michaels Organization currently does not have plans to demolish any Inter-War Era housing units at the Naval Postgraduate School or Presidio of Monterey. This technical support session included a question-and-answer component where select character defining features for the two regional installation Inter-War Era family housing units were reviewed and appropriate substitute materials were discussed. No issues were reported.

Next, the Inter-War Era Housing Splash Sheet, a resource for documents associated with the Program Comment and reporting, was sent to the Housing Partner. Personal contact information for RCG&A support also was provided for ongoing assistance in applying the Program Comment.

- **Camp Parks, CA** Moffett Airfield has nine Inter-War Era historic dwelling units, all single-family and two-story. RCG&A began this site visit with a brief overview of the purpose of the Program Comment followed by site visits to the Inter-War Era neighborhood. These dwelling units fully were walked to gather comprehensive photographs of units and landscape features, to understand building chronology, and to discuss common maintenance issues at these dwellings. Dwellings at these neighborhoods generally were one- to two-story, single-family and duplex units employing a Spanish Colonial style. The Michaels Organization stated that no Inter-War Era housing units had been modified applying the Program Comment at this time. All work between Moffett Airfield was undertaken between December 14 and December 15, 2022. The technical support session was undertaken later in the week to accommodate staff availability. This session began with a PowerPoint presentation entitled “Department of the Army Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940): Implementation and Reporting.” The PowerPoint reviewed the origins and purpose of the Program Comment, Design Guidelines, Building Materials Catalog, demolition procedures, and reporting requirements.

Summary of Representative Actions Conducted under the Program Comment

The following table provides a summary of representative actions undertaken in 2022 related to Inter-War Era Housing.

Table 1: 2022 Summary of Representative Actions

Installation	Action	Number of Units
Fort Bliss	Roof replacement	98
Fort Sill	Back porch step cement replacement	1
Aberdeen Proving Ground	Replacement of windows with vinyl units	1
Fort Bragg	Renovation	13
Fort Bliss	Roof replacement	98
Fort Bliss	Renovation	98
Aberdeen Proving Ground	Replacement of windows and doors	1
Fort Bliss	Painting, caulking, and glazing	98
Fort Sill	Rehang downspout	1
Aberdeen Proving Ground	Window and door replacement	6
Fort Sill	Replace sidewalk	1
Fort Riley	Roof replacement	2
Fort Bragg	Repair and replacement of exterior elements	26
Fort Sill	Door replacement	1
Fort Bragg	Repair and replacement of exterior elements	3
Rock Island Arsenal	Front and rear door replacement	1

*N/A indicates no action taken during reporting period

Anticipated Application of Demolition Procedures

A demolition procedure for Army Inter-War Era housing was established in section 3.2.5.1 of the Program Comment. The demolition procedure includes evaluating the condition of the building, considering prudent and feasible alternatives to demolition, preparing a Building Disposition Report, soliciting comments on the Building Disposition Report, and submitting a Major Decision Package.

The Fort Sill housing partner has completed all requirements in the Program Comment for proposed demolition of Inter War Era garages. A major decision package has been submitted and is currently pending approval.

Joint Base Meyer-Henderson Hall has proposed the demolition of two residential garages seven Non-Commissioned Officer (NCO) duplexes, one swimming pool, and one pool house in order to construct two unaccompanied enlisted personal housing barracks and associated parking. It is anticipated development of a Building Disposition report for this undertaking will occur in 2023.

VI. Army Federal Preservation Officer National Historic Landmarks Policy Memorandum for Inter-War Era Housing

In meeting the treatment measure specified in Program Comment Section 3.4.f, the Army FPO issued a NHPA policy memorandum regarding Inter-War Era Housing National Historic Landmarks (NHL) entitled *Preservation of Army Inter-War Era National Historic Landmark Housing (1919-1940)*. The NHL policy memo is posted on the Program Comment website. Implementation of this treatment measure is complete. The policy memorandum underscores that NHLs “have specific statutory and regulatory requirements for special consideration and a higher standard of care and preservation under NHPA Section 110(f), and 36 CFR 800.10.” The Army has 213 Inter-War Era housing units that are contributing elements to three Army NHL districts: 206 units within the NHL district at West Point, New York; six units within the NHL district at Fort Myer, Virginia; and one unit within the NHL district at Fort Shafter, Hawaii. The policy memorandum clearly states that the Program Comment is not applicable to Inter-War Era housing units that are NHL properties, and that the Army will continue to comply with NHL regulatory requirements including NHPA Section 110(f), 35 CFR 800.3 - 800.7, and 36 CFR 800.10.

VII. Army Program Comment Website Activities

The extensive documentation regarding the history of Army Inter-War Era housing are public educational materials, and have been consolidated and are maintained by the Army on a publicly accessible website located at <https://www.denix.osd.mil/army-pchh/home/>. The website was initially established by the Army in 2019 for the purposes of Program Comment consultation with interested parties and was redesigned in September 2020 after the ACHP issued the Program Comment. The website redesign occurred to better facilitate public access to information in accordance with the Program Comment and provides clear and easy public access to Army Inter-War Era housing historical information and associated documents as well as the archival administrative record pertaining to the development of the Program Comment. Program Comment implementation materials, including the Program Comment, Design Guidelines, Building Materials Catalog, and the NHL memorandum, are also posted on the front page of the website, along with annual reports, technical documents, media links, and Army historic preservation public outreach materials. The website also contains an archive section where Program Comment consultation process materials can be found.

The Army Historic Preservation and Cultural Resources Management website at www.denix.osd.mil/army-cr/home/ provides an easily accessible, centralized location for all

Army-wide NHPA and Native American-related policy and compliance documents. The website contains all current Department of the Army NHPA related strategy and policy documents, all Army-wide and applicable DoD-wide NHPA Program Comments and agreements, the Department of the Army's Native American policy and guidance, and baseline information regarding historic Army housing periods and geographic distribution. The Army Historic Preservation and Cultural Resources Geographical Information Systems (GIS) StoryMap, available at www.denix.osd.mil/army-cr/home/ highlights the entire suite of Army historic preservation and cultural resources including Army NHLs, historic housing and archaeological resources. The StoryMap contains an interactive web-based tour of Army Inter-War Era housing that includes photographs and style information for each installation that has Inter-War Era housing.

VIII. Public Education/Social Media Activities

In addition to the existing Inter-War Era housing historic contexts, Design Guidelines, Building Materials Catalog and extensive Inter-War Era housing historical documentation available on the website, additional public educational materials were developed and distributed in 2022 as required in the Program Comment. The Program Comment requires that the Army develop and distribute monthly social media content through 2025 using the information developed for the Program Comment for Inter-War Era housing and general information pertaining to Army historic preservation activities and other Army historic property types.

The Army is conducting its social media outreach using Twitter, and provided monthly tweets published to <https://twitter.com/DENIXnews> (link to the Twitter page is also provided on the Program Comment webpage). The 2022 Tweets were published at the beginning of every month. The Army received over 2,593 views of its Twitter posts during the reporting period. The Tweets and their associated Twitter activity is provided in Table 2.

Table 2: 2022 Program Comment Social Media / Twitter Summary

Posted Date	Tweet Content	Total Views
Jan. 4, 2022	<p>Tweet 1: The @USArmy Program Comment for Inter-War Era Historic Army Housing proved to be very effective in its first full year of implementation, successfully integrating #historicpreservation as part of the solution to the Army’s most critical military family housing concerns.</p> <p>Tweet 2: Efficient, cost-effective management actions implemented under the Program Comment occurred on @USArmy Inter-War Era housing units across the country including improvement of exterior elements and interior spaces using both in-kind and imitative substitute building materials.</p> <p>Tweet 3: The use of imitative substitute building materials contributed to significant cost savings, protected the historic character of the housing, and helped improve the quality life, health and safety of military families living in Inter-War Era housing.</p>	611
Feb. 4, 2022	<p>Check out the @USArmy Inter-War Era Program Comment in action! The Program Comment provides for cost effective window replacements like these at Ft. Belvoir, VA that preserve historic character while improving quality of life for military families living in Inter-War Era housing.</p> <div data-bbox="602 1331 1040 1661" data-label="Image"> </div>	118

Table 2: 2022 Program Comment Social Media / Twitter Summary


Posted Date	Tweet Content	Total Views
Mar. 3, 2022	<p>Tweet 1: The @USArmy recently published a two volume Historic Context and Inventory and Evaluation report for Army Vietnam War Era housing, available at https://denix.osd.mil/army-vwehh-pc</p> <p>Tweet 2: This Historic Context provides an unprecedented information set pertaining to Army Vietnam War Era housing, including a detailed historic context, and a new inventory and evaluation of Army Vietnam War Era housing from ten Army installations across the country.</p> 	226
Apr. 6, 2022	<p>Check out the Program Comment for Army Vietnam War Era Historic Housing update provided to the @usachp on 28 March: https://denix.osd.mil/army-vwehh-pc/featured-content/notifications-and-announcements/briefing28maravehpc/Briefing28MarAVEHPC.pdf</p>	127

Table 2: 2022 Program Comment Social Media / Twitter Summary

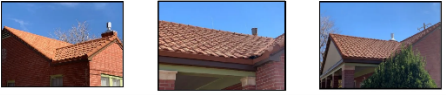
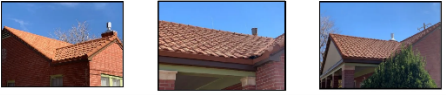
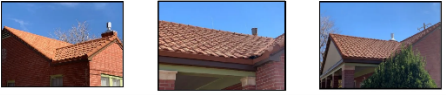
Posted Date	Tweet Content	Total Views												
May 9, 2022	<p>Tweet 1: It's #PreservationMonth2022! When it comes to historic housing and #SavingPlaces, the @USArmy leads the way by using innovative building materials.</p> <p>Tweet 2: Imitative substitute building materials such as metal tile roofing on historic Army housing makes them more resilient in a climate-altered world. Check out the graphic for more info:</p> <div data-bbox="570 657 1068 940" data-label="Complex-Block"> <table border="1"> <thead> <tr> <th colspan="2" data-bbox="570 657 1068 688">Imitative Substitute Building Material Improves Climate Resiliency and Promotes Preservation of Historic Army Housing</th> </tr> </thead> <tbody> <tr> <td data-bbox="570 688 797 737"> <p>The Advisory Council on Historic Preservation authorized the use of imitative substitute building materials in their approval of the Program Comment for Army Inter-War Era Housing (1919-1940) in September 2020.</p> </td> <td data-bbox="797 688 1068 737"> <p>Imitative Substitute Building Material Success, Fort Bliss, TX Metal tile roofing on Army Inter-War Era housing at Fort Bliss, TX maintains the historic Spanish Revival style, improves quality of life for military families, and provides climate resistant and cost-effective housing preservation.</p> </td> </tr> <tr> <td data-bbox="570 737 797 785"> <p>Imitative substitute building materials are modern, industry standard, natural, composite, and synthetic building materials that simulate the appearance of and substitute for more costly historic building materials.</p> </td> <td data-bbox="797 737 1068 785"> <ul style="list-style-type: none"> • Climate Resilient: The metal tile roofing is more durable in extreme weather events with a Class 4 impact rating vs Class 3 rating for clay tile. • Cost Effective: Saved \$2.2 million by using metal tile roofing vs the cost of clay tile roofing. </td> </tr> <tr> <td data-bbox="570 785 797 833"> <p>Metal tile roofing is an imitative substitute building material used to replace deteriorated high-cost clay tiles on 98 Spanish Revival style Inter-War Era homes at Fort Bliss, TX.</p> </td> <td data-bbox="797 785 1068 833"> <ul style="list-style-type: none"> • Lower Life Cycle Costs: Result from lower maintenance requirements for metal tile roofing vs clay tile roofing. • Improved Quality of Life for Military Families: Cost savings from imitative substitute material use can be reinvested into other housing improvements for residents. </td> </tr> <tr> <td colspan="2" data-bbox="570 833 1068 846"> <p><i>Metal Tile Roofing on Army Inter-War Era Spanish Revival Housing at Fort Bliss, TX</i></p> </td> </tr> <tr> <td colspan="2" data-bbox="570 846 1068 940">  </td> </tr> </tbody> </table> </div>	Imitative Substitute Building Material Improves Climate Resiliency and Promotes Preservation of Historic Army Housing		<p>The Advisory Council on Historic Preservation authorized the use of imitative substitute building materials in their approval of the Program Comment for Army Inter-War Era Housing (1919-1940) in September 2020.</p>	<p>Imitative Substitute Building Material Success, Fort Bliss, TX Metal tile roofing on Army Inter-War Era housing at Fort Bliss, TX maintains the historic Spanish Revival style, improves quality of life for military families, and provides climate resistant and cost-effective housing preservation.</p>	<p>Imitative substitute building materials are modern, industry standard, natural, composite, and synthetic building materials that simulate the appearance of and substitute for more costly historic building materials.</p>	<ul style="list-style-type: none"> • Climate Resilient: The metal tile roofing is more durable in extreme weather events with a Class 4 impact rating vs Class 3 rating for clay tile. • Cost Effective: Saved \$2.2 million by using metal tile roofing vs the cost of clay tile roofing. 	<p>Metal tile roofing is an imitative substitute building material used to replace deteriorated high-cost clay tiles on 98 Spanish Revival style Inter-War Era homes at Fort Bliss, TX.</p>	<ul style="list-style-type: none"> • Lower Life Cycle Costs: Result from lower maintenance requirements for metal tile roofing vs clay tile roofing. • Improved Quality of Life for Military Families: Cost savings from imitative substitute material use can be reinvested into other housing improvements for residents. 	<p><i>Metal Tile Roofing on Army Inter-War Era Spanish Revival Housing at Fort Bliss, TX</i></p>				220
Imitative Substitute Building Material Improves Climate Resiliency and Promotes Preservation of Historic Army Housing														
<p>The Advisory Council on Historic Preservation authorized the use of imitative substitute building materials in their approval of the Program Comment for Army Inter-War Era Housing (1919-1940) in September 2020.</p>	<p>Imitative Substitute Building Material Success, Fort Bliss, TX Metal tile roofing on Army Inter-War Era housing at Fort Bliss, TX maintains the historic Spanish Revival style, improves quality of life for military families, and provides climate resistant and cost-effective housing preservation.</p>													
<p>Imitative substitute building materials are modern, industry standard, natural, composite, and synthetic building materials that simulate the appearance of and substitute for more costly historic building materials.</p>	<ul style="list-style-type: none"> • Climate Resilient: The metal tile roofing is more durable in extreme weather events with a Class 4 impact rating vs Class 3 rating for clay tile. • Cost Effective: Saved \$2.2 million by using metal tile roofing vs the cost of clay tile roofing. 													
<p>Metal tile roofing is an imitative substitute building material used to replace deteriorated high-cost clay tiles on 98 Spanish Revival style Inter-War Era homes at Fort Bliss, TX.</p>	<ul style="list-style-type: none"> • Lower Life Cycle Costs: Result from lower maintenance requirements for metal tile roofing vs clay tile roofing. • Improved Quality of Life for Military Families: Cost savings from imitative substitute material use can be reinvested into other housing improvements for residents. 													
<p><i>Metal Tile Roofing on Army Inter-War Era Spanish Revival Housing at Fort Bliss, TX</i></p>														
														


Table 2: 2022 Program Comment Social Media / Twitter Summary

Posted Date	Tweet Content	Total Views
Jun. 2, 2022	<p>Tweet 1: The Army’s proposed Program Comment for Vietnam War Era Housing (1963-1975) represents a 21st century approach to historic preservation.</p> <p>Tweet 2: The Army’s Program Comment for Vietnam War Era Housing is: 1) A flexible approach designed to address a unique and specific situation,</p> <p>Tweet 3: 2) Equally focused on the historic housing and the quality of life, health and safety of the thousands of military families who live in the housing,</p> <p>Tweet 4: 3) Designed to allow for implementation of climate adaptation measures and address critical housing issues such as lead-based paint without delay, and is</p> <p>Tweet 5: 4) Cost effective to ensure the long-term preservation of the housing as a viable real property asset.</p> <p>Tweet 6: The best means to ensure preservation of the Army’s large inventory of historic housing is to sustain historic housing as a viable mission-supporting asset through the management capabilities provided by Program Comments</p>	467

Table 2: 2022 Program Comment Social Media / Twitter Summary

Posted Date	Tweet Content	Total Views
Jul. 1, 2022	<p>Tweet 1: The @USArmy proposed Program Comment for Vietnam War era housing is a 21st century approach to National Historic Preservation Act compliance for the Army’s inventory of over 7,500 modern historic homes constructed during the Vietnam War Era (1963-1975).</p> <p>Tweet 2: The @USArmy’s Program Comment for Vietnam War era housing addresses thousands of recurring management actions on the large inventory of similar modern historic homes built from 1963-1975.</p> <p>Tweet 3: The @USArmy Program Comment for Vietnam War era housing is focused on improving the quality of life, health and safety of the Army families living in the housing.</p> <p>Tweet 4: The @USArmy Program Comment for Vietnam War era housing is responsive to the Army’s unique situation of a vast and growing inventory of modern historic housing.</p> <p>Tweet 5: The @USArmy Program Comment for Vietnam War era housing supports implementation of the Army’s Climate Strategy and climate change adaptations for the housing.</p> <p>Tweet 6: The @USArmy Program Comment for Vietnam War era housing is appropriately calibrated to the nature, significance, and ubiquity of the Vietnam War era housing property type.</p> <p>Tweet 7: The @USArmy Program Comment for Vietnam War era housing includes properly focused mitigation measures directly addressing the National Register significance of the property type.</p> <p>Tweet 8: The @USArmy Program Comment for Vietnam War era housing is appropriately synchronized with ongoing real property business management practices.</p> <p>Tweet 9: The @USArmy Program Comment for Vietnam War era housing will provide long-term preservation by ensuring that the housing will be a mission-supporting real property asset into the future.</p>	400

Table 2: 2022 Program Comment Social Media / Twitter Summary

Posted Date	Tweet Content	Total Views
Aug. 1, 2022	<p>Tweet 1: This old Santa Fe trail cut has been preserved by the Army @USArmy Fort Leavenworth, KS. (picture)</p> <p>Tweet 2: Settlers, traders, and soldiers were ferried to this location and made their way up this hill from the nearby Missouri River to begin their journey to the far west via the Santa Fe Trail and nearby Oregon Trail.</p> 	135
Sep. 8, 2022	<p>On 26 August 2022 the Army formally submitted the proposed Program Comment for Department of the Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963–1975) to the @usachp for their action.</p>	92
Oct. 3, 2022	<p>The Program Comment for Department of the Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963–1975) is set for @usachp action at their Fall Business meeting on 26 October.</p>	53
Nov. 1, 2022	<p>Tweet 1: @USArmy celebrates #NativeAmericanHeritageMonth and the legacy of Native Americans in the US Army. https://www.army.mil/nativeamericans/?from=st</p> <p>Tweet 2: For other related information, look at the Native American and Native Hawaiian Properties section of the Army Historic Preservation and Cultural Resources Management story map here: https://www.denix.osd.mil/army-cr/</p>	47
Dec. 5, 2022	<p>View the Army website Historic Preservation and Cultural Resources Management at https://denix.osd.mil/army-cr/ for Army historic preservation policy, and the Army Cultural Resources Story Map!</p>	97

IX. Building Materials Lifecycle Data

Building materials lifecycle data tracking is identified under Program Comment Section 3.2.4 Lifecycle Data Tracking for In-Kind Building Materials and Imitative Substitute Building Materials Used in Army Inter-War Era Housing. The Army is tracking lifecycle data for in-kind and imitative substitute building materials used on 361 Inter-War Era housing units present on two Army installations, these data are provided in the Appendix to this annual report. Building material performance is being tracked at one installation located in the Mid-Atlantic region (for in-kind wood replacement windows, synthetic (faux) slate roofing, and fiber cement siding), and at one installation located in the Southeast region (for vinyl replacement windows, and PVC window trim). A total of over 3,000 building material lifecycle data points are being tracked in this effort. Performance data are collected at the housing unit level and reported annually from 2020 to 2025; performance data will then be collected and reported at five-year intervals, in 2030, 2035, 2040, 2045, 2050, and 2055. In 2022 no imitative substitute building materials being tracked required replacement.



Figure 10: Fort Benning

The following in-kind building material and imitative substitute building materials in 361 Inter-War Era historic housing units are being tracked in accordance with the Program Comment:

Table 3: Building Materials Lifecycle Tracking and Associated Number of Housing Units

Material	Number of Housing Units
Windows, vinyl replacement	202
PVC window trim	202
Windows, in-kind wood replacement	83
Synthetic slate roofing	76
Fiber Cement Siding	76

The building materials lifecycle data points tracked and reported in the Appendix to this annual report include:

- Housing Unit Number
- Date of Housing Unit Construction
- Year New Material Installed (initial installation)
- Year New Material Replaced - this information will be filled out as the material is replaced
- Total Lifecycle of New Material - lifecycle will be calculated at the time of replacement of new material (number of years)
- Lead Paint Hazard Removed (Y/N/ Not Applicable)
- Warranty (Y/N)
- Warranty (# years)
- Warranty Terms of Replacement - includes information regarding terms of replacement (if any)

The Army will amend, update, and correct these lifecycle data, as needed, to ensure their accuracy.




X. Summary Review

Program Comment section 5.1 requires that the Program Comment Annual Report include a summary review of decisions made for housing demolition; any known future demolition proposals; significant issues or misunderstandings that may have arisen in the course of applying the Program Comment, how those were addressed, and how they may be avoided in the future; and an assessment of the overall effectiveness of the Program Comment in meeting its intent and purpose.

No decisions were made for Inter-War Era housing demolition in 2022. There have been no major or significant issues or misunderstandings that have arisen while applying the Program Comment during the 2022 reporting period. Regarding the overall effectiveness of the Program Comment, our commands, installations, and housing privatization partners indicate this Program Comment is fully meeting its intent and purpose and will continue to successfully balance historic preservation requirements with the well-being of the thousands of military families who live in this historic housing. In the coming year, it is expected that management actions involving

the repair or replacement of building materials will be required for Inter-War Era housing at multiple locations. The building materials selection criteria and procedures will be followed for each action. Those activities will be summarized in the 2023 Annual Report. The Army is confident that our implementation of the extensive Program Comment training program, and our sustained professional assistance, technical support, oversight, and monitoring will ensure that the historic and architectural character of the housing is maintained while implementing actions under the Program Comment that improve the quality of life and overall material living conditions of our military families. Implementation of the Program Comment is proceeding well and meeting the objectives of the document. No problems have been encountered and no amendments to the Program Comment are required at this time.

XI. Army Inter-War Era Housing Program Comment Success Story, Fort Bliss, TX:

 AMERICA'S ARMY People First - Winning Matters		Imitative Substitute Building Material Improves Climate Resiliency and Promotes Preservation of Historic Army Housing			
The Advisory Council on Historic Preservation authorized the Army to use <i>imitative substitute building materials</i> with their approval of the Program Comment for Army Inter -War Era Housing (1919 -1940) in 2020.		Imitative Substitute Building Material Fort Bliss Success Story The installation of metal tile roofing on Inter -War Era housing at Fort Bliss maintains the historic Spanish Revival style, improves quality of life for military families, and provides climate resilient and cost-effective historic housing preservation:			
Imitative substitute building materials are modern, industry standard, natural, composite, and synthetic building materials that simulate the appearance of and substitute for more costly historic building materials.		<ul style="list-style-type: none"> • Climate Resilient : The metal tile roofing is more durable in extreme weather events with a Class 4 impact rating vs Class 3 rating for clay tile. • Cost Effective : Saved \$2.2 million by using metal tile roofing vs use of higher -cost historic clay tile roofing. • Equivalent Life Cycle : The metal tile roof has a 50-year warranty, same warranty period as a clay tile roof. • Lower Life Cycle Costs : Result from lower maintenance requirements for metal tile roofing vs clay tile roofing. • Improved Quality of Life for Military Families : Cost savings can be reinvested into other housing improvements for residents. 			
Metal tile roofing is an imitative substitute building material used at Fort Bliss, TX to replace highly deteriorated historic clay tiles on 98 Spanish Revival style Army Inter-War Era homes.					
Metal Tile Roofing on Army Inter-War Era Spanish Revival Housing at Fort Bliss, TX					
Photos courtesy of Balfour Beatty					