



2023 ANNUAL REPORT
PROGRAM COMMENT FOR
DEPARTMENT OF THE ARMY INTER-WAR ERA
HISTORIC HOUSING, ASSOCIATED BUILDINGS
AND STRUCTURES, AND LANDSCAPE
FEATURES (1919-1940)

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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) 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 Belvoir, RCG&A 2023

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.

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 2: Fort Bliss, RCG&A 2023

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.

The Program Comment was formally adopted by the ACHP on 4 September 2020, and established 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 2023 Annual Report:

The 2023 Annual Report is submitted in fulfillment of Section 5.1 of the Program Comment. The 2023 Program Comment reporting period runs from 1 January 2023 through 31 December 2023. This Annual Report summarizes actions undertaken by the Army in 2023 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 3: Fort Bliss, RCG&A 2023

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.

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 *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](#).

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. 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 by qualified professionals under Army contract 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. The Army FPO ensured on-site professional assistance and technical support visits occurred. 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). Qualified historic preservation professionals from RCG&A provide support and assistance to the Army's privatized housing partners.

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 *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. Examples of 2023 Technical Support Provided for Application of Building Materials Selection Criteria and Procedures, and Application of Demolition Procedures

Site Specific Summary of 2023 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.

Site visits to Inter-War Era installations were undertaken in 2023 and will continue into 2024 to overview the Program Comment, application of Design Guidelines, Building Materials Catalog, and reporting requirements, and to provide technical support related to proposed projects. Army private housing Partners manage the historic housing on the majority of installations. Table 1 below includes a summary of housing partners participating in site visits.

Table 1: Inter-War Era Housing Partners Participating in Site Visits

Installation	State	Housing Partner	Number of Inter-War Units
Fort Belvoir	Virginia	Michaels	164
Fort Moore (Benning)	Georgia	Michaels	492
Fort Bliss	Texas	Balfour-Beatty	147
Joint Base Lewis McChord	Washington	Liberty	330
Joint Base San Antonio	Texas	Hunt	296
USAG Hawaii	Hawaii	Lendlease	386
Fort Liberty (Bragg)	North Carolina	Corvias	230
Fort Knox	Kentucky	Lendlease	202
Fort Sill	Oklahoma	Corvias	259
Fort Riley	Kansas	Corvias	143

The visits included survey of selected projects completed during the year and photographs of selected housing units.

The following provides additional details from several installation site assistance visits during the reporting period with important information bearing on the annual report.

Fort Bliss, Texas

The requirements of the Program Comment for Inter-War Era Housing were reviewed. There are three major areas of Inter-War Era housing at Fort Bliss: the Red Brick neighborhood, the Beaumont neighborhood, and the Spanish Stucco neighborhood.

An information packet on the Red Bricks summarizing current building materials and identified appropriate replacement materials is being compiled by the privatized housing partner in coordination with RCG&A and other professionals to be used during renovation. Discussion focused on including the Building Materials Selection Criteria in the packet rather than having to cross reference it in the Program Comment. Once the partner's funding is obtained, there is also a plan to renovate all 98 red bricks following the information packet. Clay tile roofs on the Red Bricks are being replaced with imitative substitute clay tile.

Beaumont is located near an old Veteran Affairs clinic and is located outside of Fort Bliss's core contiguous boundaries. The housing partner and the Army plans to excess the Beaumont parcel. Eleven Inter-War housing units are in the Beaumont parcel and contain lead-based paint that must be abated. The partner believes that no outside party will purchase the parcel without demolition due to their condition. Demolition procedures from the Program Comment were reviewed.

Currently, there are no plans for the Spanish Stuccos besides continued maintenance.

A tour of Beaumont and the Red Bricks was undertaken. The partner requested information on cleaning brick following the Secretary of the Interior's Standards and assistance on finding appropriate lighting for porches. Information was provided.

Fort Belvoir, Virginia

The requirements of the Program Comment was reviewed and discussed including a discussion of upcoming projects. Discussions included their ongoing window replacement program being implemented in accordance with the Program Comment. Current photographs of those actions are below.



Figure 4: Fort Belvoir Window Replacement, interior, 2023



Figure 5: Fort Belvoir window replacement, exterior, 2023

Fort Knox, Kentucky

The requirements of the Program Comment was reviewed and discussion of planned improvements to officers' quarters (Quarters One) near the parade field were undertaken. Improvements will include expansion of the kitchen, requiring modification of first floor plan, as well as bathroom and closet expansions on the second floor. The goal is a Summer 2024 start, to be complete in 2025. Representatives discussed the interior floor plan modifications in relation to the program comment and reviewed the building materials selection information. The housing partner stated they would provide updates as they progress in their planning stages.

Other 2023 Actions

Table 2 provides several examples of other actions taken to maintain Inter-war era housing in 2023 pursuant to the Program Comment. It is noted that both in-kind and imitative substitute building materials are being used to replace deteriorated historic materials.

Table 2

Installation	Action	Number of Units
Joint Base Lewis McChord, WA	Rotting wood replacement on porches, windows, and dormers	5
Aberdeen Proving Ground, MD	Roof replacement	1



Figure 6: Joint Base Lewis McChord, in-kind replacement of rotting wood on porch overhang, before, 2023



Figure 7: Joint Base Lewis McChord, in-kind replacement of rotting wood on porch overhang, after, 2023



Figure 8: Joint Base Lewis McChord, in-kind replacement of rotting windows, before, 2023



Figure 9: Joint Base Lewis McChord, in-kind replacement of rotting windows, after, 2023



Figure 10: Aberdeen Proving Ground roof replacement using imitative substitute synthetic slate. Cost savings for this one roof replacement resulting from use of synthetic slate vice natural stone slate was over \$112,000. Roof replacement required due to significant deterioration of original roofing materials.

2023 Planning for a 2024 Action – Roof Replacement at Fort Sill, OK

The Army’s housing partner at Fort Sill initiated planning in 2023 to replace a clay tile roof on a Spanish Revival Inter-War Era home that suffered severe storm damaged. In-kind natural clay tiles were considered along with imitative substitute synthetic clay tiles following the building materials criteria and selection procedure. The imitative substitute synthetic clay tiles manufactured by *Brava* were selected based on several factors.



Figure 11: Representative example of synthetic *Brava* Spanish tile, an imitative substitute building material

The high winds and severe storms of Oklahoma require a roofing material that is climate resilient. The increasing intensity and frequency of storms with high winds affecting Fort Sill impact multiple Inter-War era homes with natural clay tiles, requiring recurring and costly clay tile replacement as the tiles are blown off and break. The *Brava* synthetic clay tiles are tested and approved to withstand wind speeds of 188 mph with nails, and up to 211 mph with high wind / screw installation. Natural clay tiles are brittle and more susceptible to hail and wind storm damage and weathering than the imitative substitute synthetic clay tiles. The *Brava* synthetic tiles have a Class 4 impact rating and are more durable than natural clay tile roofs. The *Brava* product is closed cell, meaning there is very little water absorption which eliminates freeze/thaw cycle effects. The closed cells also protect against mold, mildew, and lichen growth, eliminating costly maintenance to address those issues. Recycled materials are used in the manufacture of the synthetic *Brava* clay tiles, and the synthetic *Brava* tiles are also fully recyclable. The synthetic *Brava* tiles have a 50-year transferrable warranty, a Class A fire rating, and have a lower maintenance requirement than natural clay tile. Finally, the cost of the roof replacement with the imitative substitute synthetic tile is over \$30,000 less than the cost of replacement with in-kind natural clay tile.

Summary of 2023 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.

On 9 January 2023, the Army notified the ACHP of the decision to demolish ten Inter-War Era garage buildings located in the Quanah Parker Square neighborhood, Fort Sill, Oklahoma (OK). The Building Disposition Report (BDR) was provided to the ACHP in 2022 as discussed in the Annual Report for 2022.

Joint Base Meyer-Henderson Hall (JBM-HH) has proposed the demolition of Inter-War era properties including 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. A BDR was developed and submitted to the ACHP for review on 29 September 2023. The ACHP's response letter dated 27 October 2023 stated that JBM-HH applied the demolition procedures provided within the Inter-War PC and in accordance with those procedures, the BDR includes the application of the demolition criteria, analysis of the properties current condition and utilization, and evaluation of alternatives. The ACHP concluded that the JBM-HH BDR meets the requirements set forth in the procedures and the ACHP has no additional comments.

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 utilized 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 was undertaken 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 policy 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 2023 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, rebranded as X in 2023, and provided monthly tweets published to <https://twitter.com/DENIXnews> (link to the Twitter page is also provided on the Program Comment webpage). The 2023 Tweets were published at the beginning of every month. The Army received 821 views of its Twitter posts during the reporting period. The Tweets and their associated Twitter activity is provided in Table 3.

Table 3: 2023 Program Comment Social Media / Twitter Summary

Table 3: 2023 Program Comment Social Media / Twitter Summary		
Posted Date	Tweet Content	Total Views
Jan. 10, 2023	Tweet 1: Look for the Army Inter-War Housing Program Comment Annual Report for 2022 to be posted on the website https://www.denix.osd.mil/army-pchh/ this month!	34
Feb. 1, 2023	<p>Tweet 1: In accordance with the @USArmy Inter-War Era Program Comment, the Annual Meeting will be held with @usachp on February 22. The 2022 @USArmy Inter-War Era Program Comment Annual Report will be discussed at the meeting.</p> <p>Tweet 2: Check out the 2022 report at https://denix.osd.mil/army-pchh/home/ to see how the Program Comment is successfully meeting its purpose and intent and is now an established part of the solution to Army’s critical military family housing.</p>	107
Mar. 8, 2023	Advisory Council on Historic Preservation, @usachp vote for approval of the Vietnam War Program Comment period will conclude on 17 March. The @USArmy will implement measures upon ACHP approval. For more info, check out our website at https://www.denix.osd.mil/army-vwehh-pc/ .	32

Table 3: 2023 Program Comment Social Media / Twitter Summary

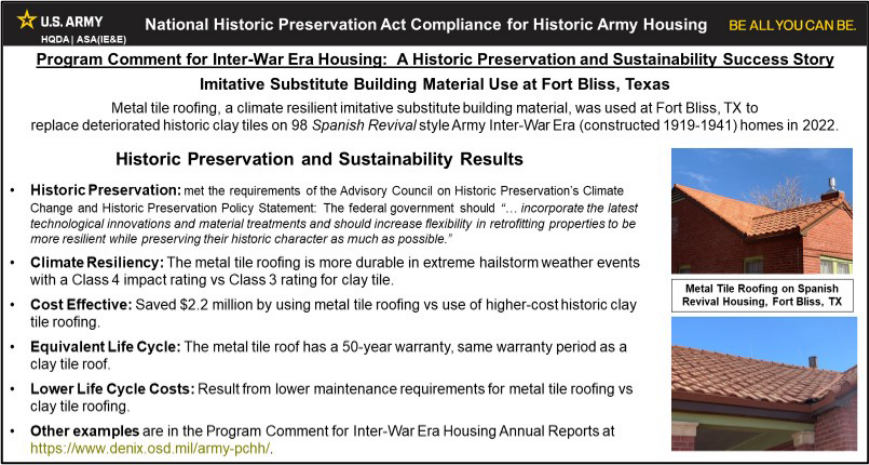
Posted Date	Tweet Content	Total Views
Mar. 27, 2023	<p>Good news! The @usachp has approved the Program Comment for Army Vietnam War Era Housing 1963-1975 that streamlines the regulatory process for approval of historic housing improvements. The Program Comment is located here: https://www.denix.osd.mil/army-vwehh-pc/</p> <p>“ACHP members last week approved the issuance of a Program Comment that provides the Department of the Army with an alternate way to comply with its responsibilities under Section 106 of the National Historic Preservation Act for specific housing. https://achp.gov/news/achp-members-approve-department-army-program-comment”</p>	42
Apr. 3, 2022	<p>National Historic Preservation Act compliance for 95% of the Army’s inventory of 30,640 historic homes is now completed by the Program Comments for Army Inter-War Era, Capehart Wherry, and Vietnam War Era housing. See the Program Comments at www.denix.osd.mil/army-cr/home/.</p>	52
May 9, 2023	<p>Check out this Fort Bliss historic housing success story! The use of imitative substitute building materials is a win for both historic preservation and sustainability for historic @USArmy housing:</p> <div data-bbox="391 1203 1255 1665" style="border: 1px solid black; padding: 5px;">  <p>The screenshot shows a tweet from the U.S. Army (HDDA ASA(IE&E)) with the text: "National Historic Preservation Act Compliance for Historic Army Housing BE ALL YOU CAN BE." Below this is a link to a "Program Comment for Inter-War Era Housing: A Historic Preservation and Sustainability Success Story" titled "Imitative Substitute Building Material Use at Fort Bliss, Texas". The text describes the use of metal tile roofing as a climate resilient imitative substitute building material to replace deteriorated historic clay tiles on 98 Spanish Revival style Army Inter-War Era homes in 2022. It lists "Historic Preservation and Sustainability Results" including: meeting requirements of the Advisory Council on Historic Preservation's Climate Change and Historic Preservation Policy Statement; being more durable in extreme hailstorm weather events (Class 4 vs Class 3 rating); saving \$2.2 million; having a 50-year warranty; and lower maintenance requirements. Two images show the metal tile roofing on the Spanish Revival housing.</p> </div>	63

Table 3: 2023 Program Comment Social Media / Twitter Summary


Posted Date	Tweet Content	Total Views
Jun. 6, 2023	<p>Tweet 1: The @usachp published the Notice of Issuance of the Department of the Army Program Comment for Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963–1975) in the Federal Register on May 4, 2023.</p> <p>Tweet 2: Check it out here: https://www.federalregister.gov/d/2023-09418</p>	98
Jul. 3, 2023	<p>The #Army is committed to preservation of its historic housing in full compliance with federal standards and in balance with the quality of life, health, and safety of the thousands of military families who live in this housing. @JBMHH</p>	54
Aug. 2, 2023	<p>Learn more about Department of the Army historic preservation and cultural resources management by visiting www.denix.osd.mil/army-cr/home/</p> 	34

Table 3: 2023 Program Comment Social Media / Twitter Summary





Posted Date	Tweet Content	Total Views
Sep. 1, 2023	<p>Read about the unique collaboration between Fort Campbell and the Eastern Band of Cherokee Indians at https://www.army.mil/article/269040 and https://www.army.mil/article/269039”</p>  	52
Oct. 4, 2023	<p>The @USArmy is seeking a Program Comment for preservation of its inventory of pre-1919 homes. More info at https://www.denix.osd.mil/army-pre1919-pchh/</p>  	76

Table 3: 2023 Program Comment Social Media / Twitter Summary

Posted Date	Tweet Content	Total Views
Nov. 3, 2023	<p>Tweet 1: The Notice of Availability for public comment on the Army’s Program Comment Plan for the Preservation of Pre-1919 historic housing was published in the Federal Register on 23 Oct 23 at https://www.federalregister.gov/d/2023-23342</p> <p>Tweet 2: The Army’s Program Comment Plan for the Preservation of Pre-1919 historic housing and other information is at https://www.denix.osd.mil/army-pre1919-pchh/. The 30-day Federal Register public comment period is open through 22 November 2023.</p>	92
Dec. 4, 2023	<p>Tweet 1 Learn more about the Army’s proposed Program Comment for pre-1919 Army housing by visiting https://www.denix.osd.mil/army-pre1919-pchh/</p>  <p>Tweet 2 The proposed Program Comment for pre-1919 Army housing follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties and the Advisory Council on Historic Preservation’s (ACHP) policy statements regarding climate change and housing.</p> <p>Tweet 3 The proposed Program Comment promotes the long-term preservation of National Historic Landmark and other pre-1919 Army housing in a more efficient, consistent, and effective manner.</p>	85

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.

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 4: 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)

As of the date of this report, no imitative substitute building materials being tracked have required replacement. 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.

There have been no major or significant issues or misunderstandings that have arisen in the course of applying the Program Comment during the 2023 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 a number of 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 reported in the 2024 Annual Report. The Army is confident that our implementation of ongoing 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 goal and objective of the document. No problems have been encountered and no amendments to the Program Comment are required.