



U.S. ARMY

CONSULTATION CONFERENCE #4:

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



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POC: Dr. David Guldenzopf, 703 459-7756

UNCLASSIFIED

PURPOSE

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

PROGRAM COMMENT PLAN

The Army's **Program Comment Plan** along with this briefing and other information is posted on the Program Comment website <https://denix.osd.mil/army-pre1919-pchh/>. Interested parties should review the Program Comment Plan since it informs this series of consultation conferences.

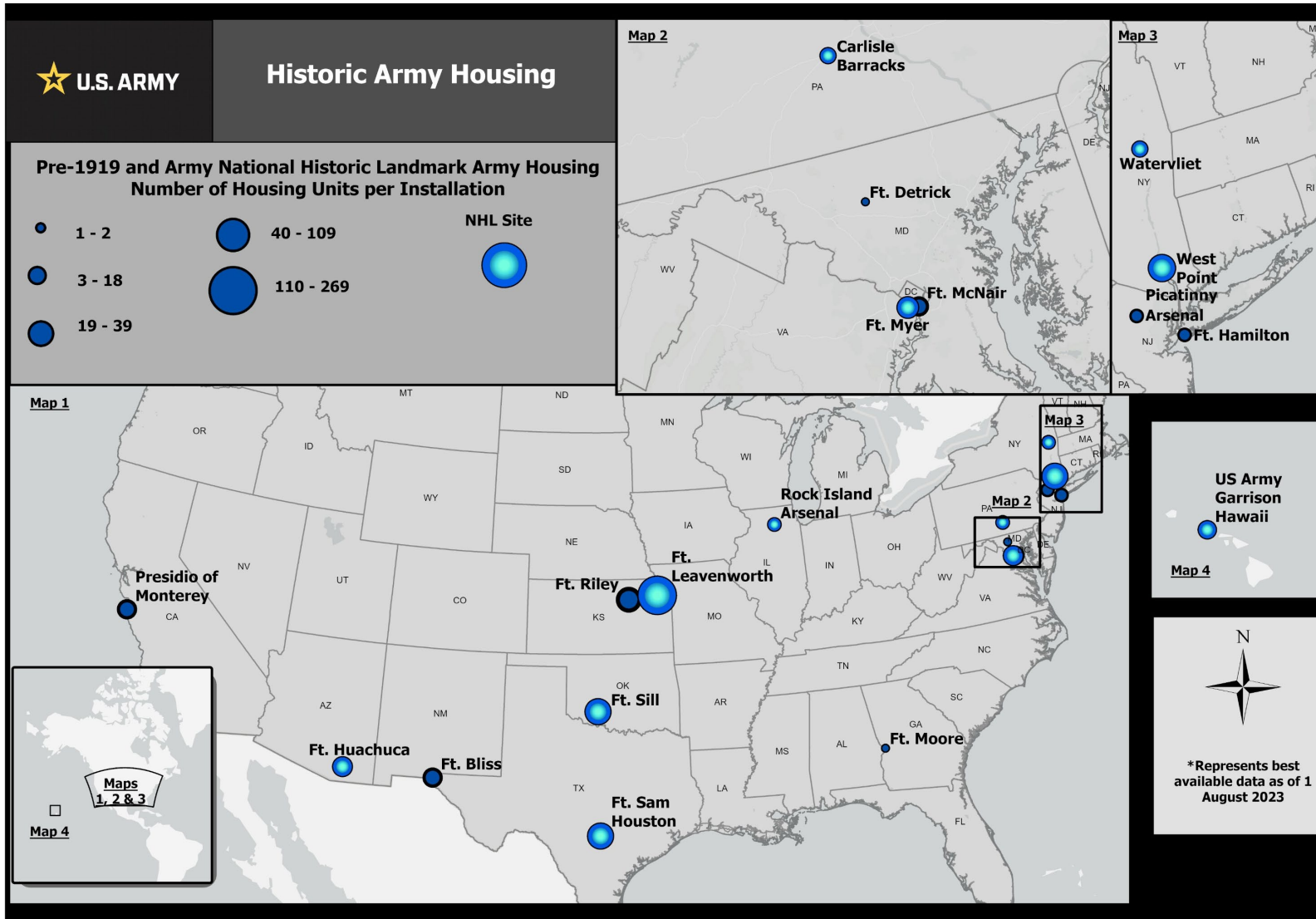
AGENDA - CONSULTATION CONFERENCE #4

I. APPROACH

II. METHODOLOGY

* Learn more about Department of the Army historic preservation and cultural resources by visiting www.denix.osd.mil/army-cr/home/.

Distribution Map of Pre-1919 Army Housing



Installation	Pre-1919
Fort Leavenworth, KS	269
Fort Riley, KS	109
Fort Sam Houston, TX	91
West Point, NY	84
Fort Sill, OK	73
Fort Bliss, TX	39
Fort Huachuca, AZ	38
Presidio of Monterey, CA	37
Fort Myer, VA	34
Fort McNair, DC	27
Carlisle Barracks, PA	18
US Army Garrison HI - Fort Shafter	17
Watervliet Arsenal, NY	8
Rock Island Arsenal, IL	6
Fort Hamilton, NY	6
Picatinny Arsenal, NJ	6
Fort Detrick, MD	2
Fort Moore, GA	1
Total	865

Examples of Pre-1919 Army Housing



Fort Leavenworth, KS



Fort Riley, KS



Fort Sam Houston, TX



Fort Shafter, HI



Fort Sill, OK



West Point, NY



Rock Island Arsenal, IL



Fort McNair, DC

I. APPROACH

- The Army will implement program comment management actions to address the issues of health and safety, costs, process time, and the material living conditions of pre-1919 historic housing using appropriate building materials and methods that will maintain the historic character of the housing, associated buildings and structures, and landscape features.
- Army will implement its management actions in consideration of the use of historic building materials, in-kind building materials, and imitative substitute building materials.
- The Secretary of the Interior's Standards for Treatment of Historic Properties at 36 CFR 68 state that one set of standards applies to properties undergoing treatment. Army and privatized housing partners apply the Standards for Rehabilitation.
- Rehabilitation is defined in 36 CFR 68 as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Standards state that they will be applied taking into consideration the economic and technical feasibility of each project.

I. APPROACH

- The Secretary of the Interior’s Guidelines for Rehabilitating Historic Buildings (in the Secretary’s Standards and Guidelines) provide a prioritized hierarchy for the use of different types of building materials when rehabilitating historic buildings.
- At the top of the hierarchy is the repair of any deteriorated original historic building materials and features (such as original windows, doors, roofing, etc.) with a focus on minimal change to materials, features, and spaces. The original historic building materials, features, finishes, and construction techniques are preserved and deteriorated historic features are repaired rather than replaced.
- Where deterioration requires replacement of original historic building materials, the replacement is first to be with in-kind building materials matching the original historic material in composition, design, color, texture, and other physical and visual properties.
- And only when replacement with in-kind materials is not feasible, a “compatible substitute material that reproduces the overall appearance of the historic material”, i.e., imitative substitute building materials - may be considered.

I. APPROACH

- As stated in 36 CFR 68.3, the Secretary's Standards are to be applied taking into consideration the economic and technical feasibility of each project.
- The NHPA and the Secretary's Standards and Guidelines are however primarily focused on the preservation of the architectural integrity of historic buildings. The NHPA Section 306108 process and Secretary of the Interior's Standards and Guidelines do not adequately account for the financial impacts and process time impacts that the preservation requirements have on the owners, managers, and occupants of historic buildings.
- Nor does the building materials selection hierarchy in the Secretary's Guidelines for Rehabilitating Historic Buildings sufficiently address and prioritize the costs associated with the repair of historic building materials or the use in-kind building materials, the costs of the specialized craftsmen required, and the impacts those high costs have on the ability to fully implement quality of life, health and safety improvements for occupants of historic housing. Further, the Secretary's Guidelines for Rehabilitating Historic do not prioritize the use of modern climate resilient building materials.

I. APPROACH

- In this program comment, the Army intends implement a flexible approach to building materials selection that fully comports with the Secretary's Standards by taking into consideration the financial and technical feasibility of projects. This approach follows the ACHP's *Housing and Historic Preservation Policy* which states *the most flexible interpretation* should be used when applying the Secretary's Standards to projects involving housing.
- The Army will consider the use of historic building materials, in-kind building materials, and imitative substitute building materials by means of a flexible approach that takes the economic and technical feasibility of projects into consideration along with the compatibility of treatments and materials. This approach considers the known health hazards from lead-based paint and asbestos found in many historic building materials; the high costs and persistent health risks associated with the repair and restoration of historic building materials; the poor performance, lifecycle, and high costs of in-kind building materials; and the high costs and availability of specialized craftsmen required for historic and in-kind materials as factors in building materials selection process.
- In this program comment, as in the Program Comment for Army Inter-War Era Housing (1919-1940), the hierarchy for materials selection in the Secretary's Guidelines for Rehabilitating Historic Buildings is implemented in a flexible real-world management approach that considers financial, health and safety, climate resiliency, and process time impacts on the owners, managers, and occupants of historic homes equally with preservation concerns.

II. METHODOLOGY

- Planning for the selection and use of appropriate building materials in the repair and renovation of historic housing is critical. The primary focus is on preservation of the historic character of the housing in an efficient and cost-effective manner to promote long term sustainability, climate resiliency and improve the material living conditions of military families.
- Specific overarching planning criteria for the selection of appropriate building materials in this program comment consider the need to maintain the historic and architectural character of pre-1919 housing in a balanced priority with cost, climate resiliency, and the health, safety, and quality of life considerations for military families living in pre-1919 housing.
- To further ensure that proper planning for and use of appropriate building materials occurs, the Army has also developed two preservation planning documents associated with the proposed program comment: the Design Guidelines, and the Building Materials Catalog. These two preservation planning documents are incorporated into this proposed program comment.

II. METHODOLOGY

- The building materials selection criteria and procedures establishes the principles and conditions for repair of historic building materials, and use of in-kind and imitative substitute building materials when historic building materials require replacement.
- The criteria addresses the need to maintain the historic and architectural character of historic housing in a balanced priority with the health, safety, and quality of life considerations for military families that live in historic housing. The selection procedure is a step-by-step evaluation process that determines the appropriate materials to be used in management actions.
- The building materials criteria and selection procedures will be applied taking into consideration the financial and technical feasibility with reference to the Design Guidelines and Building Materials Catalog

II. METHODOLOGY

- **Criteria:** The building materials selection criteria 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 historic housing for military families, imitative substitute building materials will be considered for use in a manner that maintains the historic character of the housing.

- **Procedure:**
 - a. Characterize historic building materials currently present in terms of design, material properties, condition, performance, safety, and presence of hazards such as lead-based paint, asbestos, and other hazardous materials.
 - b. Determine if the health and safety of housing occupants is a concern due to unsafe or hazardous historic building conditions or materials.
 - c. Determine if the costs associated with initial or continued use of historic building materials impacts the ability to fully implement quality of life improvements to the housing.
 - d. Determine if a historic building material must be replaced due to deterioration, health and safety considerations, lack of availability of historic materials or skilled craftsmen, or financial impacts to quality-of-life improvements.
 - e. If replacement is required, determine if there are material characteristics of the historic building materials that should be improved upon.
 - f. Evaluate suitable replacement in-kind building materials and imitative substitute building materials with respect to appearance, design, and material properties to ensure compatibility. Evaluate climate resiliency, expected performance/durability, costs, and short and long-term cost/benefit considerations.
 - g. Determine if use of in-kind building materials is financially feasible or impacts the ability to fully implement quality of life, health and safety improvements to the housing.
 - h. Compile a short list of potential in-kind building materials or imitative substitute building materials.
 - i. Select the appropriate replacement material.

II. METHODOLOGY

- **Design Guidelines** provide specific information regarding pre-1919 housing architectural styles and identify character-defining features and design elements associated with the pre-1919 architectural styles. Character-defining features include the overall shape, style, and design of the building, decorative details, interior spaces and features, as well as its associated buildings and structures, and landscape features. The Guidelines provide detailed recommendations for routine maintenance, rehabilitation, renovation, windows and doors, entrances, porches and details, roofs, foundations and walls, interiors, and interior structural systems, historic designed landscapes and features, historic districts, circulation systems, associated buildings and structures, mothballing of housing, emergency repairs and disasters, and actions related to military force protection requirements.
- **Building Materials Catalog** is used in concert with the Design Guidelines. The Building Materials Catalog provides additional specificity on building materials and their use. The Building Materials Catalog provides information to assist in selecting the appropriate building materials that maintain the historic and architectural character of the housing. Catalog entries are provided for major components of the house design. Design considerations for each catalog entry are derived from the design fundamentals of scale, mass, proportion, and materials. This provides the guidance for selection of appropriate materials and component designs that factor location, type, size, finish and maintenance into their selection. Focus is on appropriate design, applicable materials, and performance characteristics with emphasis on retention of design integrity.