



2023 ANNUAL REPORT

PROGRAM COMMENT FOR DEPARTMENT OF THE ARMY VIETNAM WAR ERA HISTORIC HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES (1963-1975)

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INTRODUCTION

The Army's real property is a vital component of its national defense mission, and many of the buildings and structures constructed by the Army over its 247-year history are now historic properties. Among those historic properties, historic housing is a significant concern; it is a large part of the Army's total housing inventory, is critical to the readiness mission and well-being of thousands of Soldiers and their families, and it requires extensive financial resources and process time for compliance with NHPA Section 106 and 36 CFR 800.

The Army has a unique and significant challenge among federal agencies in managing NHPA Section 106 compliance for its inventory of historic housing. The Army operates the largest inventory of historic housing in the federal government with over 30,000 historic homes currently over 50 years old and subject to NHPA Section 106 requirements. The Army's historic housing inventory includes examples that span from the early 19th century through the modern historic housing of the late 20th century that is subject of this Program Comment. The Army's historic housing represents a diverse inventory of American domestic architectural styles with highly varied levels of architectural integrity and historic significance. The Army will have an additional 70,000 modern historic homes added to its historic housing inventory over the next 50 years and will in this century have an unprecedented total of over 100,000 historic homes subject to NHPA Section 106 requirements.

This Program Comment for Department of the Army (Army) Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963–1975) (Program Comment) provides the Army with an alternative means to comply with NHPA Section 106 regarding the category of undertakings termed *management actions* for its inventory of Vietnam War Era housing, associated buildings and structures, landscapes, and landscape features.

The Army has over 7,800 historic homes constructed during the 13-year Vietnam War Era from 1963-1975. Management actions required for this housing include maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of modern, readily available industry standard building materials and methods in the implementation of management actions.

1.0 Need for the Program Comment

The need for this Program Comment was found in the Army's obligation to provide safe, healthy, quality housing to Soldiers and their families, and the unique challenges the Army has in managing NHPA Section 106 compliance for its large and growing inventory of historic housing. In 2019, the Secretary of the Army declared an Army Housing Crisis due primarily to widespread

deficiencies and significant quality of life, health, and safety issues effecting military families living in historic Army housing.

To address the Army Housing Crisis and meet its housing obligations to military families, the Army must implement management actions to improve Army Vietnam War Era housing conditions effecting the quality of life for Soldiers and their families; address the health and safety risks from certain hazardous historic building materials; ensure cost efficient, effective, and consistent management of the overall inventory; implement climate adaptations and use modern resilient materials; and improve the NHPA Section 106 compliance processes times for actions intended to preserve Vietnam War Era housing.

Housing and associated living conditions are critical factors for military families in the context of the challenges and stressors Soldiers and their families must cope with in their daily lives. A direct connection exists between poor housing conditions and military readiness. Concerns among service members about poor housing conditions have been found to make it difficult to focus on the military mission, some service members are leaving the military because of poor housing conditions, and the issue is also impacting the ability to recruit new service members (GAO Report 20-281, Military Housing, March 2020).

Housing during the Vietnam War Era was constructed with single-pane windows, asbestos containing shingles and siding, minimal wall and attic insulation, galvanized steel pipes for water supply, cast iron drainpipes, 100-amp circuit breakers, obsolete HVAC components, and lead-based paint and asbestos containing building materials. Most original building materials in Army Vietnam War Era housing have been replaced. The housing is smaller, and floorplans are obsolete relative to the modern standards expected by military families. While improvements to Army Vietnam War Era housing have been made in the past, many requirements remain, and continue to arise and creating the continuous need for implementation of the management actions addressed in this Program Comment.

The Army also has the need to lease, transfer, or convey Vietnam War Era housing to facilitate housing operations by its housing privatization partners under the Army's Residential Communities Initiative (RCI). RCI operates under Army authority on Army installations nationwide through legal partnerships between the Army and private sector developers. Lease, transfer, and conveyance involves the execution of lease, transfer, and other conveyance documents for the purposes of transfer of Vietnam War Era housing to and between RCI partners, between RCI partners and the Army, and out of RCI partner or government ownership.

The Army must holistically manage its total inventory of Vietnam War Era housing to make certain the housing is preserved and maintained as a viable real property asset into the future. Managers of large inventories of real property understand that total inventory management includes the recurring need to at times cease maintenance and demolish certain properties that are no longer

viable real property assets. For Army Vietnam War Era housing, cessation of maintenance and demolition are inventory management tools that reduce the excessive costs associated with maintaining certain homes that are no longer viable real property assets. The resulting cost savings are reinvested to maintain and preserve the remaining housing inventory as viable property assets. Cessation of maintenance and demolition may be required for certain Army Vietnam War Era housing when deterioration effects the structural integrity of homes, the habitability of homes, or the quality of life of military family occupants; when the homes are no longer needed, stand vacant and are expected to remain vacant into the foreseeable future; where hazardous materials and unsafe conditions exist that could affect the health and safety of occupants; and when new replacement housing is needed to improve the overall quality of life for military families. The majority of Program Comments issued by the ACHP over the past 20 years recognize the necessity for and include demolition as an accepted inventory management tool.

2.0 Intent of the Program Comment

This Program Comment is intended to provide the Army compliance with NHPA Section 106 for the management actions occurring on all privatized and non-privatized Army housing, associated buildings and structures, and landscape features constructed from 1963 through and including 1975. Management actions will be implemented under this Program Comment in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7, with an exception provided in section 5.2.4.3 regarding the treatment of properties of particular importance.

The Program Comment identifies mitigation measures for the management of the Army's Inter-War Era housing. Section 5.2.7 of the Program Comment mandates annual reporting on those mitigation measures. The mitigation measures subject to reporting are:

- Existing Mitigation Measures
- Public Education on the History of Army Vietnam War Era Housing
- Historic Context Research for Army Vietnam War Era Housing
- Army-wide Vietnam War Era Housing Inventory and Evaluation
- Designation of Properties of Particular Importance
- Recordation and Documentation of Properties of Particular Importance
- Treatment of Properties of Particular Importance
- Neighborhood Design Guidelines
- Historic Preservation Tax Credits, and
- Annual Meeting

2.1 Existing Mitigation Measures

The Army has extensive documentation on the history and historic context of Vietnam War Era housing, installation-specific inventory and evaluation reports of Vietnam War Era housing recording its design and architectural style, interior designs and floorplans, factors influencing design variations, and its associated buildings and structures, and landscape features. This existing set of prior Army documentation serves as a Program Comment mitigation measure since it provides comprehensive documentation and recordation of Vietnam War Era housing, associated buildings and structures, and landscape features. The documentation for Army Vietnam War Era housing is on the Army’s Vietnam War Era Housing website <https://www.denix.osd.mil/army-vwehh-pc>.

The prior documentation includes the overarching DoD-wide historic context *Vietnam and the Home Front: How DoD Installations Adapted, 1962–1975*, June 2014; the *Department of Defense Housing Design Folio*, 1964; *Fort Gordon Cold War Architectural Survey*, April 2005; *Architectural Survey Conelly Duplex Units, Hawthorne Army Depot, NV*, September 2014; and *Architectural Inventory and Evaluation of 1970s-Era Family Housing at U.S. Army Garrison Fort Carson, CO*, August 2019.

2.2 Public Education on the History of Army Vietnam War Era Housing

The Army maintains a public website containing information about the history of the Army Vietnam War Era housing for public educational purposes. Relevant public documentation regarding Vietnam War Era housing is available via the website. The Army also used social media to distribute information on Vietnam War Era historic housing and other Army historic preservation information.

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 1.

Table 1: 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

Table 1: 2023 Program Comment Social Media / Twitter Summary		
Posted Date	Tweet Content	Total Views
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	<p>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/.</p>	32
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/ “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

Table 1: 2023 Program Comment Social Media / Twitter Summary

Posted Date	Tweet Content	Total Views
<p>May 9, 2023</p>	<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="391 426 1252 884" data-label="Image"> </div>	<p>63</p>
<p>Jun. 6, 2023</p>	<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>	<p>98</p>
<p>Jul. 3, 2023</p>	<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>	<p>54</p>
<p>Aug. 2, 2023</p>	<p>Learn more about Department of the Army historic preservation and cultural resources management by visiting www.denix.osd.mil/army-cr/home/</p> <div data-bbox="391 1633 769 1862" data-label="Image"> </div>	<p>34</p>

Table 1: 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 1: 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

2.3 Historic Context Research for Army Vietnam War Era Housing

New scholarly information on the history of Vietnam War Era housing through in-depth professional research and presentation of additional Army Vietnam War Era housing historic context information was developed by the Army for this Program Comment. The Army conducted archival research and assessed historical information relevant to the nation-wide historic context of the housing, address the history and characteristics of the military construction program for

Vietnam War Era housing, and other important aspects pertaining to the history of Army Vietnam War Era housing in the context of the Vietnam War. The two-volume historic context documentation is published on the Army's Vietnam War Era Housing public website <https://www.denix.osd.mil/army-vwehh-pc>.

2.4 Army-Wide Vietnam War Era Housing Inventory and Evaluation

An Army-wide inventory and evaluation of Vietnam War Era housing was developed by the Army for the Program Comment. This includes the inventory of representative Vietnam War Era housing architectural styles, associated buildings and structures, and landscape features, and information and evaluation of the housing's location, design, setting, materials, workmanship, and feeling, provide information. The report also provides the identification and evaluation of properties of particular importance. The documentation is published on the Army's Vietnam War Era Housing public website <https://www.denix.osd.mil/army-vwehh-pc> as part of the two-volume historic context document.

2.5 Designation of Properties of Particular Importance

Army Vietnam War era housing properties of particular importance are defined as: Army Vietnam War era housing that retains a high degree of integrity, represents particularly important historical aspects of the Army Vietnam War Era housing program, and that represent particularly important building types or methods of construction. To be considered properties of particular importance Army Vietnam War Era housing must retain original location, scale, mass, proportion, materials, and ornamentation from the period of construction.

Army Vietnam War era homes designated as properties of particular importance are in the Akolea, Aloala, and Ralston neighborhoods at Schofield Barracks, Hawaii (HI).

Unlike all other Army installations with Vietnam War era housing, the housing in these three neighborhoods at Schofield Barracks has had minimal modifications in terms of materials, additions, and new construction. This housing not undergone the significant redesign or extensive replacement of original building materials and ornamentation that has occurred throughout the rest of the Army inventory of Vietnam War Era housing. The original building designs and building materials such as jalousie windows and concrete block and wood board-and-batten siding are original, roof modifications are minimal. Interior modifications are also minimal to maintain the livability of the units and consist of replacement finishes, fixtures, and appliances. In select cases, some housing units were combined, and those original interior floor plans were modified.

Despite some minimal modifications over time, Army Vietnam War era housing in the Akolea, Aloala, and Ralston neighborhoods retains sufficient integrity of association, feeling, location, and setting to convey their historical association with the Vietnam War. The buildings retain integrity

of design, materials, and workmanship. The housing is however not distinctive or distinguishable in its design and construction relative to the national inventory of housing from this period. Additionally, research has not identified any association with persons important in the past, and the housing is unlikely to yield information important to history because it is not the principal source of information representing housing constructed during the Vietnam War Era.

The inventory conducted at Schofield Barracks confirmed that the military followed civilian-sector housing trends and did not construct housing that was unique or distinctive from the 20 million civilian sector homes constructed in the US during this period. Through the retention of original building materials and design, the housing in the Aloala, Akolea, and Ralston neighborhoods maintains the domestic design principles popularized during the period. The Vietnam War Era housing in the Aloala, Akolea, and Ralston neighborhoods retains original location, scale, mass, proportion, materials, and ornamentation from the period of construction. The neighborhood designs are cohesive and visually convey original suburban residential design from the Vietnam War Era.

2.6 Recordation and Documentation of Properties of Particular Importance

The Army has recorded and documented the designated properties of particular importance. The recordation and documentation include site-specific archival research of primary and secondary source materials and review of previous studies to develop a specific history and statement of significance for the designated properties of particular importance at Scofield Barracks. Research includes a review of drawings, historic photographs, and written documents, as available. Fieldwork investigations documented the current appearance of the buildings with digital images of individual building types including elevations and exterior details of the housing. The digital photographs follow National Park Service digital photography standards and show the respective housing in context. The documentation of the designated properties of particular importance is published on the Army's Vietnam War Era Housing website <https://www.denix.osd.mil/army-vwehh-pc/> in the two-volume historic context document.

2.7 Treatment of Properties of Particular Importance

Inventory management requirements for Army Vietnam War Era housing may necessitate the cessation of maintenance and demolition of properties of particular importance designated in section 5.2.4.1 of the Program Comment. The Army will follow the consultation process in 36 CFR 800.6 - 800.7 to address adverse effects when designated Vietnam War Era housing properties of particular importance are proposed for cessation of maintenance and demolition. Memoranda of Agreement (MOAs) or Programmatic Agreements (PAs) prepared in accordance with 36 CFR 800 to resolve the adverse effects of cessation of maintenance and demolition on the designated properties of particular importance are subject to the following requirements of this Program Comment: a) properties of particular importance have been identified, evaluated, and

designated under this Program Comment and no further actions under 36 CFR 800 or any MOA or PA shall be stipulated or required to identify, evaluate, or designate additional Army Vietnam War Era housing properties of particular importance and, b) the documentation of properties of particular importance prepared in section 5.2.4.2 of the Program Comment will be incorporated as a mitigation measure in any MOA or PA prepared to address cessation of maintenance and demolition of Army Vietnam War Era housing properties of particular importance. The procedures in this section for treatment of properties of particular importance apply over the duration of this Program Comment.

2.8 Neighborhood Design Guidelines

The Army prepared Army Vietnam War Era Housing Neighborhood Design Guidelines in coordination with the ACHP. A qualified professional was used to prepare the Neighborhood Design Guidelines. The design and setting of Vietnam War Era neighborhoods and landscape features in were addressed in the Neighborhood Design Guidelines. The Neighborhood Design Guidelines are available to those installations with Vietnam War Era housing. The Neighborhood Design Guidelines were distributed and are being used to the maximum extent practicable in planning management actions that affect the overall design of Vietnam War Era neighborhoods.

2.9 Historic Preservation Tax Credits

Pursuant to the Program Comment, the Army FPO provided a memorandum dated 22 May 2023 advising its Residential Communities Initiative (RCI) privatized housing partners that Vietnam War Era housing may be eligible for Federal and State historic preservation tax credits. The memorandum indicated that information on federal tax credits may be found in 36 CFR 67 *Historic Preservation Certifications under the Internal Revenue Code*. Additional information may be found at the National Park Service Historic Preservation Tax Incentives web page located at <https://www.nps.gov/subjects/taxincentives/index.htm>, and at the Internal Revenue Service web page <https://www.irs.gov/businesses/small-businesses-self-employed/rehabilitation-tax-credit-real-estate-tax-tips> . The memorandum also indicated that individual states may also offer similar state-level tax incentive programs for historic building rehabilitation and that additional information on state-level historic preservation tax incentive programs may be obtained from the relevant State Historic Preservation Office. The Army FPO will provide supplemental tax credit information on request from RCI housing partners. No such requests have been received as of the data of this report.

2.10 Site Assistance Visits

2.11 Site Specific Support

Although not required by the Program Comment, site visits to installations subject to the Program Comment were undertaken in 2023 and will continue into 2024 to review the Program Comment

and to provide technical assistance from qualified individuals in its application. This represents a good faith effort by the Army to ensure this Program Comment is being implemented as intended. The visits included survey of project completed since the execution of the Program Comment and photographs of selected housing units. The site visits were conducted by qualified individuals. The following installations were visited:

2.11.1 Fort Campbell, KY

The requirements of the Program Comment for Vietnam Era Housing were reviewed. There are two main areas of Vietnam housing on post: Stryker Village and Turner Loop.



Figure 1: Fort Campbell, RCG&A 2023

2.11.2 Fort Carson, CO

The requirements of the Program Comment for Vietnam Era Housing were reviewed.. Vietnam War Era housing at Fort Carson that includes Apache Village, Shoshoni Village, and Sioux Village. Cherokee West, constructed in 1962 is currently being demolished. Following the presentation, a tour of Vietnam era neighborhoods took place. The inclusion of Cheyenne Village under the Program Comment was discussed.



Figure 2: Fort Carson, RCG&A 2023

2.11.3 Fort Meade, MD

Review of the Program Comment requirements and discussion of upcoming projects was undertaken. Question and answers regarding demolition, consultation, and defining management actions was completed.

2.11.4 Fort Gordon, GA

The Vietnam Program Comment was reviewed, and upcoming projects were discussed. Management was also informed about the RCG&A contract and availability to aid in implementing the Program Comment. There is a phased demolition planned at Gordon Terrace, proposed to being in 2025 at the earliest. The plan is to demolish 76 houses at Gordon Terrace (asbestos and lead paint present). The next phase is to address additional units once new housing has been built over next 3-5 years.

2.11.5 Fort Cavazos, TX

The Program Comment requirements were reviewed. Vietnam War Era housing is present in the following neighborhoods: Comanche I, Comanche II, Comanche III, and Venable Village. Currently, Comanche II and Comanche III are undergoing rehabilitation including new roofs and painting.

3.0 Summary Review

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 cessation of maintenance and demolition and will be required for Vietnam Era housing at several locations. 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 management actions continue to improve the quality of life, health and safety of our military families and are implemented in accordance with the requirements of the Program Comment.

Implementation of the Program Comment is proceeding as expected and the Program Comment is meeting its goal and objective. No problems have been encountered and no amendments to the Program Comment are required at this time.