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IMPLEMENTING GUIDANCE FOR ARMY DIRECTIVE 2020-10
USE OF IMITATIVE SUBSTITUTE BUILDING MATERIALS IN HISTORIC HOUSING

I. Introduction.

Army Directive (AD) 2020-10 was signed by the Secretary of the Army on 25 August 2020. HQDA EXORD 279-20 in support of AD 2020-10 was issued on 3 October 2020. AD 2020-10 establishes Secretary of the Army policy requiring the consideration of imitative substitute building materials in the maintenance, repair, rehabilitation, and renovation of Army-owned and privatized historic housing. Additionally, AD 2020-10 requires National Historic Preservation Act Section 106 memoranda of agreement (MOAs) and programmatic agreements (PAs) pertaining to historic housing that are amended or executed after the date of AD 2020-10 provide for the use of imitative substitute building materials in Army-owned and privatized historic housing to the maximum extent possible.

AD 2020-10 states that imitative substitute building materials will be selected and used with appropriate planning to ensure that the historic and architectural characteristics of historic housing are maintained. This implementing guidance provides a building materials selection criteria, a building materials catalog, and a step-by-step procedure for selection of appropriate building materials in historic housing. The criteria, selection procedures, and building materials catalog provide the basis for appropriate planning for the use of imitative substitute building materials in historic Army housing to ensure that the historic and architectural characteristics of historic housing are maintained.

II. Command Implementation.

HQDA EXORD 279-20 in support of AD 2020-10 requires Commands to:

- a. Task AD 2020-10 requirements to subordinate units and disseminate AD 2020-10 to widest distribution to installation and sites managed by the Army for implementation.
- b. Ensure NHPA Section 106 MOAs and PAs pertaining to Army-owned and privatized historic housing that are amended or executed after the 25 August 2020 date of AD 2020-10 provide for the use of imitative substitute building materials to the maximum extent possible.
- c. Take discretionary action to prioritize and amend existing NHPA Section 106 MOAs and PAs pertaining to Army-owned and privatized historic housing that were executed prior to the date of AD 2020-10 in order to provide for the use of imitative substitute building materials to the maximum extent possible.

d. Ensure any privatized housing partner holding title to historic army housing is an invited signatory to all NHPA Section 106 MOAs and PAs pertaining to that housing that are amended or executed after the date of AD 2020-10.

e. Coordinate review of all Section 106 MOAs and PAs pertaining to Army-owned and privatized historic housing that are developed or amended after the date of AD 2020-10 with the HQDA Deputy Chief Of Staff (DCS), G-9.

f. Provide data to the DCS G-9 Army Environmental Quality Branch during the annual environmental data call indicating the status of each NHPA Section 106 MOA and PA pertaining to historic housing that is planned or in the process of development or amendment to comport with the HQDA EXORD and AD 2020-10.

III. Definitions:

Imitative substitute building materials - modern, industry standard, natural, composite, and synthetic materials that simulate the appearance of and substitute for more costly historic building materials and in-kind building materials.

Historic building materials - building materials that are 50 years old and older.

In-kind building materials - new building materials that are identical to historic building materials in all possible respects, including their composition, design, color, texture, and other physical and visual properties.

IV. Imitative Substitute Building Materials Selection Criteria.

This selection criteria establishes the principles and conditions for use of imitative substitute building materials. The criteria address 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 following criteria apply to the selection of building materials in historic Army housing management actions (including but not limited to maintenance, repair, rehabilitation, and renovation). 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 and architectural character of the historic housing.*

V. Building Materials Catalog.

The Building Materials Catalog developed for Army Inter-War Era Historic Housing (1919 - 1940), located at <https://denix.osd.mil/army-pchh/home/>, is applicable to other Army historic housing dating to earlier or later periods. It may be used for implementation of AD 2020-10 to

help identify appropriate imitative substitute building materials. The building materials catalog is used in step “f.” of the Building Materials Selection Procedure below.

VI. Building Materials Selection Procedure.

The following step-by-step procedure for the selection of appropriate building materials, used in tandem with the building materials catalog will ensure that proper planning occurs to maintain the historic and architectural characteristics of historic housing. The procedure is be applied in the context of historic housing management actions including renovation, rehabilitation, and to purchases of bulk or stock materials used in maintenance and repair actions for historic housing.

The step-by-step procedure is:

- 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, 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 design and material properties. Evaluate expected performance, costs, and short and long-term cost/benefit considerations. Determine if use of certain in-kind building materials impacts the ability to fully implement quality of life improvements to the housing.
- g. Compile a “short list” of potential in-kind building materials, or imitative substitute building materials.
- h. Select an appropriate replacement material. Selection of an appropriate in-kind building material or imitative substitute building material from the short list of materials.
- i. Document the evaluation and selection process.
- j. Write specifications for design and installation, and oversee project planning and implementation.