



AMERICA'S ARMY:

Globally Responsive, Regionally Engaged

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PROPOSED PROGRAM COMMENT FOR ARMY INTER-WAR ERA HISTORIC HOUSING (1919-1940)

Consultation Conference Call

10 June 2020

Imitative Substitute Building Materials Catalog, and Program Comment Consultation Summary

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Briefing Agenda

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- I. Imitative Substitute Building Materials Catalog
- II. Program Comment Consultation Summary



I. Imitative Substitute Building Materials Catalog (Building Materials Catalog)

- Intent: The Building Materials Catalog, used in concert with the Design Guidelines, provides detailed design guidance for the application of specific imitative substitute building materials
- The Building Materials Catalog addresses imitative substitute building materials applications for:
 - Exteriors:
 - Foundations (to include concrete, masonry, exterior bulkheads, window wells, and foundation windows)
 - Exterior Cladding (wood, masonry, stucco)
 - Roofing and Associated Elements
 - Porches (to include porch supports, stairs, and railings)
 - Window Bays (to include sash and surrounds, shutters, screens, lintels, transoms, and sills)
 - Entries (to include doors and surrounds)
 - Landscape and Amenities (to include residential and communal spaces: courtyards, street furniture, circulation features, fencing, and water features)
 - Interiors:
 - Ceilings and Walls
 - Flooring
 - Interior Features (to include stairs, built-ins, and trim)
 - Doors
 - Fixtures (to include lighting, plumbing, radiators and floor grills, fireplaces, and hardware)
 - Finishes
- **Stakeholder Review Requested:** provide review comments on the Draft Building Materials Catalog by 24 Jun 20 using the Building Materials Catalog Comment Matrix. Both documents are located in the Program Comment website <https://denix.osd.mil/army-pchh/home/>, in the Consultation Conference Calls section



II. Program Comment Consultation Summary

- Background: Events Leading to the Program Comment
- Scope of the Program Comment and Locations
- Intent and Benefits of the Program Comment
- Consultation Process
- Issues Reported to the ACHP
- Program Comment Reporting
- Program Comment Schedule



- **Reuters Special Report, Aug 16, 2018 “*Children Poisoned by Lead on U.S. Army Bases*”**
Lead-based paint historic building materials in Army Inter-War Era Historic Housing identified as the source
- **“*Army Housing Crisis*” declared by Secretary of the Army, Jan 2019** Significant Army and Defense Senior Leadership and Congressional Member attention, widespread media reports of housing deficiencies, Congressional testimony from military family members indicating significant quality of life, health, and safety issues in historic housing
- **Army Inspector General (IG) Report, Mar 2019: Historic Housing Findings** – Historic housing is more costly to operate, maintain, and renovate; requires special historic building materials and craftsmanship; health and safety concerns such as lead paint and asbestos are present; restrictive floorplans; the processes in 36 CFR 800 and the Programmatic Agreements for historic housing are highly procedural, time consuming, with variable application of standards
IG Recommendation: Assess the feasibility of continuing the Programmatic Agreements (PA) for historic housing
Army Leadership Response: Develop a plan to address the PAs and improve NHPA compliance for historic housing
- **Army Strategic Agenda for National Historic Preservation Act, Jul 2019** issued by the Assistant Secretary of the Army for Installations, Energy and Environment. Directs the Army Federal Preservation Officer to pursue a programmatic NHPA compliance solution for historic Army housing. That solution is the Army's proposed *Program Comment for Army Inter-War Era Historic Housing (1919-1940)*
- **Program Comment 36 CFR 800.14(e)** “An agency official may request the Council to comment on a category of undertakings in lieu of conducting individual reviews under §§ 800.4 through 800.6.”

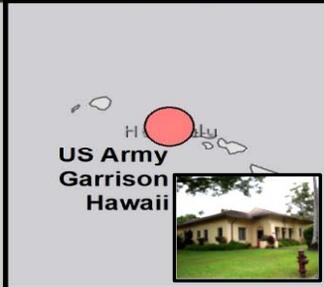


Scope and Locations

Army Inter-War Era Housing (1919-1940)
Over 3,200 Housing Units

Historic Housing Units Per Installation

- 1 - 10
- 11 - 40
- 41 - 100
- 101 - 200
- 201 - 500

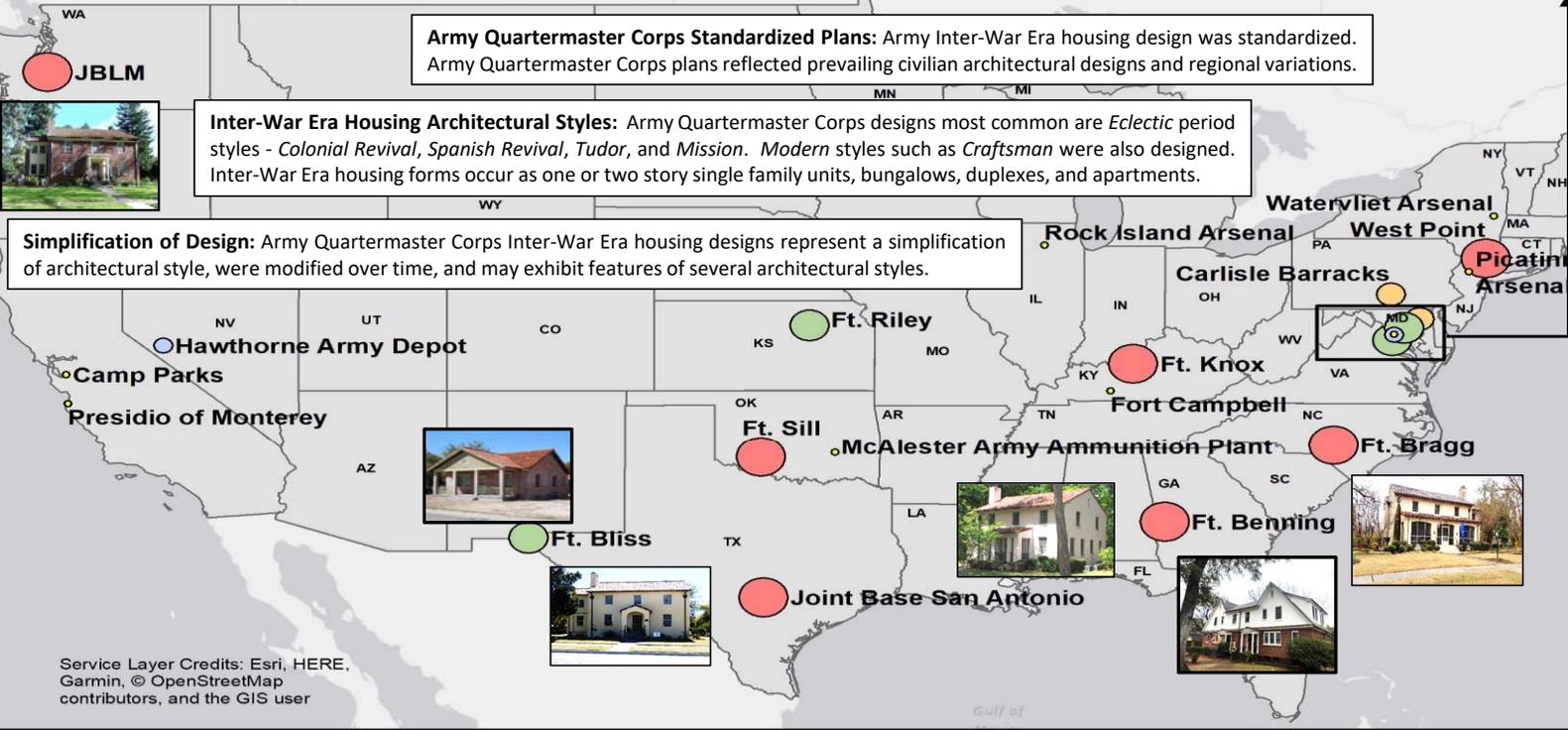


INSTALLATION	# OF HOUSING UNITS
Fort Benning, GA	492
USAG HI	386
Joint Base Lewis-McCord (JBLM), WA	330
Fort Sam Houston, at Joint Base San Antonio, TX	296
Fort Sill, OK	259
Fort Bragg, NC	230
West Point, NY	206
Fort Knox, KY	202
Fort Belvoir, VA	164
Fort Bliss, TX	147
Fort Riley, KS	143
Fort Meade, MD	112
Aberdeen Proving Ground, MD	97
Carlisle Barracks, PA	75
Hawthorne Army Depot, NV	34
Joint Base Myer Henderson Hall, VA	22
Camp Parks, CA	9
Picatinny Arsenal, NJ	8
Rock Island Arsenal, IL	7
McAlester Army Ammunition Plant, OK	5
Presidio of Monterey, CA	4
Fort Campbell, KY	2
Watervliet Arsenal, NY	1
Arlington National Cemetery, VA	1

Army Quartermaster Corps Standardized Plans: Army Inter-War Era housing design was standardized. Army Quartermaster Corps plans reflected prevailing civilian architectural designs and regional variations.

Inter-War Era Housing Architectural Styles: Army Quartermaster Corps designs most common are *Eclectic* period styles - *Colonial Revival*, *Spanish Revival*, *Tudor*, and *Mission*. *Modern* styles such as *Craftsman* were also designed. Inter-War Era housing forms occur as one or two story single family units, bungalows, duplexes, and apartments.

Simplification of Design: Army Quartermaster Corps Inter-War Era housing designs represent a simplification of architectural style, were modified over time, and may exhibit features of several architectural styles.



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- **Intent of Program Comment for Army Inter-War Era Historic Housing**
 - **To balance historic preservation considerations required under Section 106 with issues that directly impact military families:** their quality of life; the health and safety risks from hazards found in historic building materials; the Section 106 compliance process delays that impact timely occupancy of housing; and the high costs of historic building materials that impact the ability to fully implement housing improvements
- **As Proposed, the Program Comment Achieves the Purpose and Intent:**
 - **Category of Undertaking:** *Management Actions* - maintenance, repair, rehabilitation, renovation, abatement, demolition, new and replacement construction, mothballing, transfer, sale, and lease, that may have adverse effects
 - **Inter-War Era Housing Design Guidelines Preserve the Historic and Architectural Design Integrity of the Housing and Its Setting:** Design Guidelines preserve the integrity of the housing and its setting with the use of both *in-kind historic building materials* and *imitative substitute building materials*
 - **Reduces Health and Safety Risks to Military Families:** Reduces and eliminates health and safety hazards by directly addressing lead-based paint and other hazardous contained in historic building materials
 - **Improves Military Family Quality of Life:** Provides the option to replace high cost historic building materials and specialized craftsmen with imitative substitute building materials to allow upgrades and improvements not previously possible or that were cut from projects due to high cost historic materials and craftsmen
 - **Improves Compliance Process Efficiency and Effectiveness:** Reduces delays in housing occupancy. Program Comment procedures will be followed in lieu of the current process of conducting individual project-by-project reviews of every management action on every housing unit under existing PAs and 36 CFR §§ 800.4 - 800.6
 - **Cost Avoidance \$450M:** Estimated over the next 35 years with use of imitative substitute building materials.



Extensive Program Comment Coordination and Consultation:

• Fiscal Year 2019

- 16 Aug - DOD Historic Preservation and Privatized Housing Workshop – Army FPO briefing and discussion on the Program Comment concept – ACHP's Reid Nelson and NCSHPO's Erik Hein in attendance
- 18 Sep - Assistant Secretary of the Army Alex Beehler meeting with Chairman Aimee Jorjani, proposing the Program Comment for Army Inter-War Era Historic Housing
- 19 Sep - Formal Notification from Army FPO to the ACHP Executive Director of Army's intent to request a Program Comment for Army Inter-War Era Historic Housing
- 23 Sep - Formal Notifications of Army's intent to request a Program Comment to: National Trust for Historic Preservation (NTHP), National Conference of State Historic Preservation Officers (NCSHPO), and National Association of Tribal Historic Preservation Officers (NATHPO)
- 25 Sep - ACHP acknowledgement of Army's notice of intent to request a Program Comment
- 25 Sep - Initial Program Comment Consultation Meeting with NTHP
- 30 Sep - Initial Program Comment Consultation Meeting with NCSHPO

• Fiscal Year 2020

- 09 Oct - Initial Consultation Meeting with NATHPO
- 15 Oct - Public Web Site *Program Comment for Inter-War Era Historic Army Housing 1919-1940* activated at <https://denix.osd.mil/army-pchh/home/>
- 17 Oct - Army FPO Invitation to *Program Comment Consultation Conference Calls* to 900+ Individual Stakeholders with public web site address, and Army FPO contact information
- 28 Oct - Federal Register Notice and 45 Day Public Comment period, nation-wide Army Media Release



- **Fiscal Year 2020 (cont.)**

- 05 Feb - Senate Armed Services Committee Professional Staff Member engagement on Army Program Comment
- 17 Mar - Senate Armed Services Committee official request to DoD for draft legislation to authorize military department use of imitative substitute materials and to provide standalone authority for demolition of historic housing

Monthly Stakeholder Consultation Conference Calls:

- Email invitation sent by Army FPO directly to each of 900+ stakeholders for each call inviting participation (Indian Tribes and THPOs 748, SHPOs 112, ACHP 2, NGOs 6, NHOs 36 / Total 904). Each consultation call date and topic as follows:
 - ✓ 13 Nov Introduction to Inter-War Era Housing Program Comment and Army Privatized Housing
 - ✓ 11 Dec Inter-War Era Housing Undertaking and Property Types
 - ✓ 08 Jan Inter-War Era Housing Treatment Measures and Effects
 - ✓ 12 Feb Inter-War Era Housing Design Guidelines
 - ✓ 03 Mar Inter War Era Housing Demolition
 - ✓ 11 Mar Inter-War Era Housing Properties of Particular Importance (held on 1 Apr due to COVID-19)
 - ✓ 08 Apr Inter-War Era Housing Public Educational Materials
 - ✓ 13 May Treatment Measure Monitoring and Reporting
 - ✓ 10 Jun Building Materials Catalog and Program Comment Consultation Summary
- Reasonable and good faith consultation effort addressing all major aspects of the proposed Program Comment
- Each consultation conference included a briefing by FPO followed by extensive Q&As
- No limitations on number of call participants or length of calls. Average number of stakeholders per call is 22
- Army FPO also invited comments on any aspect of the Program Comment at any time by email, letter, or phone call



• Inclusion of Demolition and New Construction in the Program Comment

Issue: Stakeholders object to the inclusion of demolition and new construction in the Program Comment. National Trust summary comment: *“Army has not made a persuasive case to include demolition and new construction within the scope of the proposed Program Comment. The fundamental purpose of the proposed Program Comment is described in the [Army] Federal Register notice as the need to address “a large number of frequent and repetitive undertakings... Demolition and new construction are simply not by their nature frequent and repetitive undertakings...”*

Discussion:

- **Precedent:** Demolition and construction are included in the Program Comment for Army Capehart and Wherry Housing (1949-1962) approved by the Advisory Council in 2002
- **Meets the Program Comment Purpose and Intent:** Addresses quality of life, health, safety, and cost issues
- **Repetitive Management Actions:** Demolition and construction are repetitive management actions that will occur within this large inventory of housing. Current demolition plan is for 35 housing units over a 5 year period.
- **Army Inter-War Housing Demolition Plans in the Next 5 Years:** A group of 35 housing units in significant disrepair, contain hazardous building materials (lead-based paint and asbestos), and that have not been occupied in many years since they are located in an isolated area on a remote sub-installation that no longer has a significant military family housing requirement (Edgewood Area, Aberdeen Proving Ground, MD)

Army Response: Army intends to include demolition and new construction in its category of undertakings in the proposed Program Comment. Justification: The inclusion of demolition and new construction follows Advisory Council Program Comment precedent, is a repetitive management action, meets the purpose and intent of the Program Comment, and the actions will follow Design Guidelines procedures that were revised according to stakeholder comments



• Inclusion of Demolition and New Construction in the Army Design Guidelines

Issue: Stakeholders object to the inclusion of demolition and new construction in the Inter-War Era Housing Design Guidelines. National Trust summary comment “...requirements must be added and strengthened for public comment, consideration of alternatives, and meaningful mitigation.”

Discussion:

- **Precedent:** Inclusion of demolition and new construction in the Army Design Guidelines is consistent with the inclusion of those actions in Design Guidelines currently in use by Certified Local Governments across the country

Army Response: Revised Guideline for Demolition addresses the stakeholder identified issues, and now includes:

- **Consideration of Alternatives** required and must be a documented as part of the justification for demolition proposals
- **Public Notice and Comment** – A 30 Day Public / SHPO review and comment period is required for proposed demolition
- **Protection of Adjacent Historic Buildings**, sites, landscape features, and archeological resources from damage
- **Procedures for Discovery of Archeological Resources and Human Remains** during ground disturbing activities
- **Building Documentation:** Interior and Exterior photographic documentation to National Park Service specifications
- **Salvage of Significant Architectural Elements for Reuse** in other similar Inter-War Era housing
- **Approval of Proposed Demolition by Pentagon-level Department of the Army Deputy Assistant Secretary**
- **All Demolition Actions Annually Reported and Reviewed** in the Program Comment *Annual Report*, and discussed at the Program Comment *Annual Review Meeting*, additionally

Guidelines for New and Replacement Construction also Revised to Ensure Preservation of the Historic Design Integrity and Character of Inter-War Era Neighborhoods and Districts



- **Annual Report on Program Comment Implementation**
 - Annual Program Comment Report to ACHP to include status of treatment measure implementation:
 - Inter-War Era Historic Context development status
 - Army FPO policy issuance for NHL Inter-War Era Housing
 - Design Guidelines implementation and technical expert assistance
 - Inter-War Era Housing Public Website activities
 - Public Educational / Social Media activities
 - Demolition proposals and outcomes
 - Imitative Substitute Building Material Lifecycle Data Reporting over 35 Years:
 - ✓ Lifecycle monitoring report provided annually in 2021 - 2025
 - ✓ Lifecycle monitoring report then provided at five year intervals in 2030, 2035, 2040, 2045, 2050, 2055
 - Annual Report to ACHP posted on website
 - Assessment of Program Comment overall effectiveness in meeting its stated intent
- **Annual Meeting and Assessment of Program Comment Effectiveness**
 - The Annual Report and Annual Meeting will address Program Comment treatment measure implementation
 - Address any issues or misunderstandings that have arisen in the course of applying the Program Comment, and how those problems were addressed and may be avoided in the future
 - The Annual Report and Annual Meeting will provide an assessment of the overall effectiveness of the Program Comment in meeting its intent



Program Comment Schedule

Initiate Planning and Coordination



Stakeholder Consultation



Request and ACHP Action



Army Implementation

- ACHP engagement
- Notice of intent to ACHP
- Army Federal Register Notice / 45 day public review

- SHPOs / THPOs
- Indian Tribes
- Native Hawaiian Organizations
- Preservation NGOs

- Formal Program Comment request
- ACHP 45 Day Review
- ACHP Comment
- Federal Register Notice

- Implementing Policy
- Mitigation Measures
- Monitoring
- Reporting

Sep – Oct 2019

Nov 2019 – Jun 2020

Jul – Oct 2020

Nov 2020