



AMERICA'S ARMY:

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Proposed Program Comment for
Army Inter-War Era Historic Housing (1919-1940)

Consultation Conference Call

13 May 2020

Program Comment Treatment Measure
Monitoring and Reporting

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Treatment Measure Monitoring and Reporting

Background:

- 36 CFR 800.14(e) *Program Comments* - An agency official may request the Advisory Council on Historic Preservation (ACHP) comment on a category of undertakings in lieu of conducting individual reviews to identify, assess, and resolve adverse effects under 36 CFR 800.4 - 800.6
- The Department of the Army notified the ACHP on 19 Sept 2019 of its intent to seek a Program Comment for Army Inter-War Era Historic Housing (1919-1940)
- The Department of the Army published a notice in the Federal Register (Vol. 84, No. 28, Oct. 2019) regarding its intent to request a Program Comment for Army Inter-War Era Historic Housing (1919-1940) from the ACHP
- The Army Program Comment notice of intent to the ACHP and the Army Federal Register notice proposed a number of treatment measures to take into account the effects of Army management actions on historic housing
- The Army stated in its Federal Register notice and its notice of intent to the ACHP that it would monitor implementation of the Program Comment for Inter-War Era Housing (1919-1940) treatment measures



Treatment Measure Monitoring and Reporting:

- Annual Program Comment Treatment Measure Implementation Monitoring Report to ACHP to include:
 - Inter-War Era Historic Context status
 - Army FPO policy for NHL Inter-War Era Housing status
 - Design Guidelines technical assistance and monitoring activities status
 - Inter-War Era Housing Public Website activities status
 - Public Educational / Social Media activities status
 - Major Decision Package activities and outcomes
 - Imitative Substitute Building Material Lifecycle Data Monitoring status:
 - Lifecycle monitoring report annually in 2021, 2022, 2023, 2024 and 2025
 - Lifecycle monitoring report then at five year intervals in 2030, 2035, 2040
 - Program Comment Annual Report to ACHP posted on website
- Program Comment Annual Report Review Meeting with ACHP
- Annual Report and Annual Report Review Meeting planned for February of each year 2021-2025



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Imitative Substitute Building Materials Use

- The Army's ability to properly balance historic preservation considerations required under the NHPA with quality of life issues; health risks associated with lead-based paint, asbestos, and other hazards found in historical building materials; and the high costs of historical building materials that impact our ability to fully implement quality of life improvements for military families will be achieved under the Program Comment through the use of both in-kind historical building materials and the use of imitative substitute building materials

Imitative Substitute Building Materials Lifecycle Tracking

- To provide a longitudinal and representative data set, the Army would track data points on imitative substitute building materials types used on approximately 300 Inter-War Era housing units for 20 years
- Data tracking would be at the individual housing unit level
- Lifecycle data reporting would occur annually in 2021, 2022, 2023, 2024 and 2025, then at five year intervals in 2030, 2035, and 2040



Imitative Substitute Building Material Lifecycle Tracking (cont.)

- The Army would conduct lifecycle tracking of its use of imitative substitute building materials on approximately 300 Inter-War Era housing units as follows:
 - The following imitative substitute building material types would be tracked:
 - Faux Slate Roofing
 - Fiber Cement Siding
 - Vinyl Replacement Windows
 - Wood Replacement Windows
 - PVC Window Trim
 - The following Lifecycle Data Points would be tracked:
 - Year Imitative Substitute Building Material Installed
 - Year Imitative Substitute Building Material Replaced
 - Lifespan (number of years from year installed to year replaced)
 - Warranty on Imitative Substitute Building Materials
- Four data points collected on each of five imitative substitute building material types at the individual housing unit level within a population of 300 housing units over 20 years would provide a large and representative data set that could be subject to statistical analyses