



**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY**  
**INSTALLATIONS, ENERGY AND ENVIRONMENT**  
**110 ARMY PENTAGON**  
**WASHINGTON DC 20310-0110**

6 October 2020

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MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Preservation of Army Inter-War Era National Historic Landmark Housing (1919 - 1940)

1. References:

- a. National Historic Preservation Act (NHPA); Title 54, U.S. Code, section 300101 et seq.
- b. Title 36, Code of Federal Regulations (CFR), Part 800 *Protection of Historic Properties* (36 CFR 800).
- c. Historic Sites Act of 1935; Title 16, U.S. Code 461 et seq.
- d. 36 CFR Part 65, National Historic Landmarks Program.
- e. Program Comment for Department of the Army Inter-War Historic Housing, Associated Buildings and Structures, and Landscape Features (1919–1940), Advisory Council on Historic Preservation issued 04 September 2020, <https://denix.osd.mil/army-pchh/home/>.

2. The Advisory Council on Historic Preservation's (ACHP) Program Comment for Department of the Army Inter-War Historic Housing, Associated Buildings and Structures, and Landscape Features (1919 - 1940) (Program Comment) requires the Army Federal Preservation Officer to issue a National Historic Preservation Act (NHPA) policy memorandum pertaining to the Army's formally designated Inter-War Era National Historic Landmark (NHL) housing (see Program Comment section 3.4.f). This policy memorandum is issued in compliance with that Program Comment requirement.

3. NHLs are a special type of historic property that possess exceptional value in commemorating or illustrating the history of the United States. NHLs have specific statutory and regulatory requirements for special consideration and a higher standard of care and preservation under NHPA Section 110(f), and 36 CFR 800.10.

4. NHLs must be formally designated by the Secretary of the Interior in accordance with the Historic Sites Act of 1935, and 36 CFR 65. The National Park Service administers the NHL Program on behalf of the Secretary of the Interior. In accordance with the Historic Sites Act and 36 CFR 65, it is the responsibility of the Secretary of the Interior / National Park Service to survey, investigate, research, identify, and designate NHLs

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through theme studies or special studies. Outside parties may also conduct such studies at their own expense in coordination with the Secretary of the Interior / National Park Service, however the Secretary of the Interior / National Park Service is the federal agency that has the statutory and regulatory obligation to conduct NHL studies and the authority to formally designate a property as a NHL. If a historic property has not been formally designated by the Secretary of the Interior / National Park Service as a NHL it is not a NHL, and it does not require the higher standard of care and preservation accorded to NHLs.

5. The scope of the ACHP's Program Comment addresses over 3,200 Army Inter-War Era housing units built from 1919 - 1940 (1919 - 1943 in Hawaii). The Program Comment specifies however, that it does not apply to Army Inter-War Era housing formally designated by the Secretary of the Interior / National Park Service as a NHL or as a contributing property within a NHL district. A total of 213 Army Inter-War Era housing units have been formally designated by the Secretary of the Interior / National Park Service as contributing properties in Army NHL districts. There are no individually designated Army Inter-War Era NHL housing units, all are contributing properties to Army NHL districts.

6. The Army's 213 Inter-War Era NHL housing units are located at three Army installations with NHL districts: US Army Military Academy at West Point, NY; Fort Myer, VA; and Fort Shafter, HI. The specific Inter-War Era NHL housing units at those locations are: West Point NHL District, US Army Military Academy, West Point, NY, all 206 Inter-War Era housing units; Fort Myer NHL District, Fort Myer, VA, six Inter-War Era housing units identified as Quarters 17, 19, 20, 21, 22, and 28, located on Lee Ave; and Palm Circle NHL District, Fort Shafter, HI, one Inter-War Era housing unit identified as Quarters 18, the Hospital Commanding Officer's Quarters.

7. The Program Comment does not apply to the 213 Army Inter-War Era housing units formally designated as contributing properties within Army NHL districts. Additionally, Army Inter-War Era housing that may be formally designated in the future by the Secretary of the Interior / National Park Service as a NHL will not be covered by the Program Comment.

8. In order to meet the requirements for special consideration and a higher standard of care and preservation for its Inter-War Era NHL housing, the Army will comply with the following NHL statutory and regulatory requirements:

a. Prior to the approval an undertaking which may directly and adversely affect Army Inter-War Era NHL housing, and to the maximum extent possible, undertake planning and actions in a manner to minimize harm to Inter-War Era NHL housing, in accordance with NHPA Section 110(f).

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b. Address the effects of its undertakings on Army Inter-War Era NHL housing by following NHPA Section 110(f), the procedures in 36 CFR 800.3 - 800.7 and 36 CFR 800.10, and by following the terms of an applicable NHPA Section 106 Programmatic Agreement or Memoranda of Agreement.

c. If Army Inter-War Era NHL housing is to be directly and adversely affected by an undertaking, implement the special requirements for protecting NHLs at 36 CFR 800.10.

d. Ensure the ACHP is invited to participate in any consultation to resolve adverse effects to Army Inter-War Era NHL housing and is provided a reasonable opportunity to comment on undertakings affecting NHLs.

e. Notify the Secretary of the Interior / National Park Service of any consultation involving Army Inter-War Era NHL housing and invite the Secretary of the Interior / National Park Service to participate in consultation where there may be an adverse effect.

9. Inquiries regarding this NHPA policy memorandum may be directed to the undersigned at [david.b.guldenzopf.civ@mail.mil](mailto:david.b.guldenzopf.civ@mail.mil).



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