



ANNUAL REPORT FOR 2024
PROGRAM COMMENT FOR
DEPARTMENT OF THE ARMY INTER-WAR ERA
HISTORIC HOUSING, ASSOCIATED BUILDINGS
AND STRUCTURES, AND LANDSCAPE
FEATURES (1919-1940)

Submitted by:

**Department of the Army Federal Preservation Officer,
Office of the Assistant Secretary of the Army for Installations, Energy and
Environment**

Submitted to:

Executive Director, Advisory Council on Historic Preservation

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I. Introduction

The primary objective of the Program Comment for Department of the Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940) is to achieve programmatic compliance with the National Historic Preservation Act of 1966 (NHPA) Section 106 for repetitive management actions related to this large inventory of similar property types. This is accomplished through the program alternative procedure authorized under 36 CFR 800.14(e), which allows for a more efficient and streamlined process than individual project reviews under 36 CFR 800.4 through 800.7.

The goal of the Program Comment is to strike a balance between preserving the historic character of the housing and ensuring the efficient, consistent, and cost-effective management of the properties. This balance is essential to improving the quality of life, health, and safety of Army families living in Inter-War Era housing. The Department of the Army's goal and objective have been met through the Advisory Council on Historic Preservation's adoption of the Program Comment and the Army's implementation of the management actions and mitigation measures outlined in the Program Comment.

The Program Comment enables the Army to implement management actions in a timely and cost-effective manner, which in turn improves the quality of life, health, and safety for Army families living in Inter-War Era housing. The Program Comment also helps ensure that the inventory of Inter-War Era historic housing remains a viable and mission-supporting real property asset, while maintaining the character-defining features of the resources and their continued historical use as housing.

The Program Comment establishes procedures and requirements that address the Army's NHPA compliance responsibilities for its nationwide inventory of over 3,200 Inter-War Era housing units. It successfully balances historic preservation requirements with the well-being of thousands of military families who live in this historic housing. The management actions addressed by the Program Comment directly improve the material living conditions of the Army's Soldiers and families who live in Inter-War Era housing, while the treatment measures ensure the historic and architectural character of this housing is maintained.

As the largest owner of historic housing in the federal government, the Army has a significant obligation to manage its historic housing in compliance with the NHPA, while also ensuring the safety and well-being of military families who occupy Army housing. The Army's obligation to military families and its NHPA responsibilities present unique and significant challenges, including providing for the quality of life for Soldiers and their families, managing high maintenance, repair, and rehabilitation costs for historic housing, and addressing historic building materials that present health hazards to housing occupants.

To address these challenges, the Army developed holistic and cost-effective strategies for compliance with Section 106 of the NHPA. The Army's Program Comment for Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940) was developed in partnership with the Advisory Council on Historic Preservation (ACHP) to meet the Army's unique challenges. The Program Comment was formally adopted by the ACHP on September 4, 2020, and established a new

paradigm for integrating historic preservation treatments as part of the solution to the Army's most critical military family housing concerns.



Fort Bliss Inter-War Era Housing (Goodwin 2024)

The 2024 Annual Report

The 2024 Annual Report is submitted in fulfillment of Section 5.1 of the Program Comment, which covers the reporting period from January 1, 2024, through December 31, 2024. This Annual Report provides a summary of the actions undertaken by the Army during 2024 in the implementation of the Program Comment.

The Program Comment defines treatment measures for management actions applicable to Army housing, associated buildings and structures, and landscape features constructed during the Inter-War Era (1919-1940). The management actions addressed include maintenance, repair, rehabilitation, renovation, abatement, mothballing, demolition, replacement construction, new construction, and lease and conveyance of Inter-War Era properties.

The Program Comment supersedes and replaces all existing installation-level NHPA Section 106 agreements, procedures, and guidelines related to the preservation and management of Army Inter-War Era housing, associated buildings and structures, and landscape features.

The Program Comment applies to all Army Inter-War Era housing, including privatized housing managed under the Army's Residential Communities Initiative (RCI) and housing that remains Army-managed family housing, with some exceptions noted.

The Program Comment identifies specific treatment measures for the management of the Army's Inter-War Era housing. Section 5.1 of the Program Comment requires annual reporting on the following treatment measures:

- Inter-War Era Historic Context
- Design Guidelines and Building Materials Catalog
- Design Guidelines Professional Assistance and Monitoring Activities
- Army Federal Preservation Officer (FPO) Policy Memorandum for Inter-War Era National Historic Landmarks
- Army's Inter-War Era Housing Program Comment Website Activities
- Public Education/Social Media Activities
- Imitative Substitute Materials Lifecycle Data Reporting

According to Section 5.1 of the Program Comment, the Army is required to submit annual reports to the Advisory Council on Historic Preservation (ACHP) by January 31 of each year from 2020 to 2025. These reports provide an opportunity for the Army to summarize its progress in implementing the Program Comment and to demonstrate its commitment to preserving the historic character of its Inter-War Era housing while also ensuring the safety and well-being of military families who occupy these properties.

II. Inter-War Era Housing Historic Context

The *Army Inter-War Era Housing Historic Context* was prepared to support the *Program Comment for the Department of the Army Inter-War Era Historic Housing, Associated Buildings, and Landscape Features (1919-1940)*, adopted by the ACHP on 4 September 2020. Submitted to the ACHP in June 2021, the historic context addressed five research objectives:

- To expand the existing Inter-War Era housing historic context information
- To address precedents for the U.S. Army Quartermaster Corps Inter-War Era housing styles
- To examine Army Inter-War Era housing design in the context of architectural design in the civilian sector
- To further describe the architectural styles present in the Army's inventory of Inter-War Era housing, and
- To examine Army Inter-War Era housing in the context of social and economic changes during the Inter-War Era

The historic context provided an overview of the military history of the Inter-War Era. The Army's Inter-War Era housing program evolved to address major restructuring of the Army and its installations and the need to remedy the poor condition of family housing following World War I. The context addressed the beginning of the Army housing program after the end of World War I, and its proposed ten-year plan to construct family housing between 1926 and 1932. Funding to construct family housing became available from emergency relief funding through the Public Works Administration and the Works Progress Administration after 1933. The historic context addressed the role of the U.S. Army Quartermaster Corps in the design and construction of family housing in comparison to the trends in the civilian housing market.

The increasing role of government intervention in the housing market also was discussed. The historic context provided an in-depth analysis of the Army's family housing construction program, including the housing types and architectural styles.

III. Design Guidelines and Building Materials Catalog

Section 3.2.2 of the Program Comment, titled Design Guidelines, Building Materials Catalog, and Building Materials Selection Criteria and Procedures for Army Inter-War Era Housing, requires the Army to conduct management actions for Inter-War Era housing in a manner that preserves the historic and architectural character of these properties. To achieve this goal, the Program Comment stipulates that the Army must complete and implement Design Guidelines and a Building Materials Catalog.

The completion of these documents was a requirement of the Program Comment, as specified in Section 6.b, and was finalized on September 4, 2020, when the Advisory Council on Historic Preservation (ACHP) issued the Program Comment. The Design Guidelines and Building Materials Catalog are included as Appendices A and B in the Program Comment and are available, along with the complete text of the Program Comment, on the Army's Program Comment website <https://www.denix.osd.mil/army-pchh/>.

The Design Guidelines provide a framework for ensuring that management actions, such as maintenance, repair, and renovation, are carried out in a way that maintains the historic and architectural character of Inter-War Era housing. The Building Materials Catalog identifies the types of materials that are suitable for use in these properties, considering their historic significance and architectural integrity.

By following the Design Guidelines and using the Building Materials Catalog, the Army is ensuring that its management actions for Inter-War Era housing are consistent with the principles of historic preservation and that the historic and architectural character of these properties is maintained for future generations. The availability of these documents on the Army's website provides transparency and accessibility, allowing stakeholders to review and understand the Army's approach to managing its Inter-War Era housing inventory.



Inter-War Era neighborhood at USAG HI (Bryan Flower 2024)

Design Guidelines:

The Design Guidelines provide guidance for the treatment of all Army Inter-War Era housing and associated buildings, structures, and landscape features. Application of the Design Guidelines in decision making ensures that historic materials and character-defining architectural features of Inter-War Era housing, associated buildings, structures, and landscape features are managed within the requirements of the Program Comment. The Design Guidelines establish treatment parameters for the overall shape, style and design of the buildings, decorative details, interior spaces and features, as well as treatment parameters for associated landscape features.

Building Materials Catalog:

The Building Materials Catalog establishes a methodology for selecting building materials for use in the rehabilitation or renovation of Army Inter-War Era housing that maintain the historic and architectural character of this class of resource. Catalog entries are organized to correlate with major building components and include foundations, walls, roofing, porches, windows, entries, landscape elements, and interior features. Design considerations developed for each entry include location, type, size, finish, and maintenance; guidance for the consideration of in-kind and imitative materials in building management is provided when replacement of historic building materials is required. Emphasis is placed on retention of the design integrity of the historic property. It is anticipated that the types of imitative materials addressed in the Building Materials Catalog will be expanded, as acceptable new building materials are introduced on the market, and in consultation with the ACHP as defined in Section 8.0 (b). Any amendments to the Building Materials Catalog will be posted on the Army's website.

IV. Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure Professional Assistance, Oversight, and Monitoring Activities

Here is a rewritten version of the text with some minor edits and revisions:

For over 15 years, prior to the Advisory Council on Historic Preservation's (ACHP) adoption of the Program Comment in 2020, the Army's privatized housing partners had been operating and maintaining Army Inter-War Era housing under installation-level National Historic Preservation Act (NHPA) Programmatic Agreements. Throughout this period, the Army's privatized housing partners developed extensive experience and expertise in managing historic housing in accordance with the NHPA.

As stipulated in Program Comment Section 3.2.2.5, the Army ensured that management actions followed the Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure. To achieve this, the Army provided professional assistance, oversight, and monitoring activities through qualified professionals under contract.

In the 2024 reporting period, the Army completed a range of activities to support the implementation of the Program Comment. These included:

- Outreach and training with commands, installations, and privatized housing partners.
- Establishment of a contract with Goodwin & Associates, Inc. (Goodwin) to provide direct, on-call (telephonic and electronic) and on-site professional assistance and technical support to installations and privatized housing partners.
- Development, implementation, oversight, and monitoring of these actions by the Army Federal Preservation Officer (FPO).
- On-site professional assistance and technical support visits by qualified professionals.

The Army provided on-call historic preservation professional assistance and technical support from Goodwin. Qualified historic preservation professionals from Goodwin offered support and assistance to the Army's privatized housing partners, addressing installation-specific questions regarding the implementation of the Program Comment and application of relevant criteria and procedures.

The contact information for Goodwin was distributed to all installations and privatized housing partners managing Inter-War Era housing, enabling them to access direct, on-call telephonic and electronic support within 24 hours. This support included assistance with implementation of the Program Comment, Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure.

Through these activities, the Army ensured that installations and privatized housing partners with Inter-War Era housing fully implemented all provisions of the Program Comment, including the Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure. The Army also made the Design Guidelines and Building Materials Catalog publicly

available on the Army's Inter-War Era Housing Program Comment website and monitored and reported on their implementation.

The Army FPO maintained oversight and monitored the implementation of the Design Guidelines and Building Materials Catalog, ensuring full compliance with Program Comment Section 3.2.2.5. Overall, the Army's efforts demonstrated its commitment to preserving and protecting its historic housing stock, while also ensuring that its housing meets the needs of its service members and their families.

V. Examples of 2024 Technical Support Provided for Application of Building Materials Selection Criteria and Procedures, and Application of Demolition Procedures

Site Specific Summary of 2024 of Technical Support for Application of Building Materials Selection Criteria and Procedures:

The Program Comment criteria for building materials selection 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 housing for military families, imitative substitute building materials will be considered for use only in a manner that maintains the historic and architectural character of the historic housing and when consistent with the results of the following building materials selection procedure.

Site assistance visits to Inter-War Era installations were undertaken in 2024 and will continue into 2025 to review the implementation of the Program Comment, application of Design Guidelines, Building Materials Catalog, and reporting requirements, and to provide technical support related to proposed projects. Table 1 below includes a summary of the 2024 site assistance visits.

Table 1: Inter-War Era Housing Site Assistance Visits

Installation	State	Housing Partner	Number of Inter-War Units
Fort Belvoir	Virginia	Michaels	164
Fort Moore (Benning)	Georgia	Michaels	492
Fort Bliss	Texas	Balfour-Beatty	147
Joint Base Lewis McChord	Washington	Liberty	330
Joint Base San Antonio	Texas	Hunt	296

USAG Hawaii	Hawaii	Lendlease	386
Fort Liberty (Bragg)	North Carolina	Corvias	230
Fort Knox	Kentucky	Lendlease	202
Fort Sill	Oklahoma	Corvias	259
Fort Riley	Kansas	Corvias	143

The site visits included review of program comment requirements, survey of selected projects completed during the year, and photographs of selected housing units. The following provides additional details from several installation site assistance visits during the reporting period.

Fort Bliss, Texas

The installation has three neighborhoods of Inter-War Era housing: Beaumont, Red Bricks North, and Red Bricks South. The intended demolition and transfer of the Beaumont neighborhood is no longer occurring. The Red Bricks North development will be getting new roofs and gutters. Red Bricks South also will receive new roofs. Balfour Beatty intends to replace the windows and exterior doors on both Red Bricks.

Carlisle Barracks, Pennsylvania

Upcoming projects for the Inter-War Era housing stock include replacing the geothermal systems with standard HVAC at the Forbes Apartments. The Forbes Apartments currently includes 28 units in 14 buildings; however, six of the buildings are in the process of being returned to the Army. The six Forbes Apartments in the process of being returned to the Army continue to move forward. No issues, concerns, or problems with implementing the Program Comment.

USAG Hawaii, Hawaii

The feasibility of demolishing the Woody neighborhood is being studied. Rice Manor on Fort Shafter, an Inter-War Era housing neighborhood, was demolished under the Inter-War Era Program Comment.

Fort Liberty, North Carolina

The meeting at Fort Liberty included the project manager and other Corvais team members and reviewed the Program Comment and the Design Guidelines and Materials Catalog appendices. Goodwin provided copies of the Program Comment and its appendices for review. Goodwin also asked about common maintenance issues, which primarily related to the tile roofing materials. The Program Comment was further reviewed to provide specific guidance for those maintenance issues. Goodwin provided business cards and contact information for the Corvais team at Fort Liberty for assistance as the Program Comment is implemented.

Fort Moore, Georgia

Inter-War Era houses windows were replaced during 2024 (see table 2).

Fort Sill, Oklahoma

Corvias is planning to replace their Geothermal units in some of their Inter-War Era houses. The Geothermal units will be in-kind replacements. However, some units may need deeper wells (roughly two feet) as they originally were not dug deep enough. No other large scale upcoming projects were discussed.

Fort Sam Houston, Joint Base San Antonio, Texas

The program comment was reviewed with the RCI partner. The partner provided a site visit of Inter-War Era family housing, particularly those which have undergone railing replacement.

Joint Base Lewis McChord, Washington

The meeting at Joint Base Lewis-McChord (JBLM) included review of the Program Comment including the Design Guidelines and Materials Catalog appendices. The RCI team is in regular contact with Goodwin regarding any work utilizing the Program Comment. Newer team members asked questions, particularly about design guidelines for interiors. Goodwin provided copies of the Program Comment and its appendices for review. Goodwin also asked about common maintenance issues, which often are wood-sash windows, exterior wood railing, and tile roofing materials. The Program Comment further was reviewed to provide specific guidance for those maintenance issues. A site visit of Inter-War Era family housing occurred, particularly those which have undergone interior light fixture replacement and exterior window replacement using imitative materials.

Examples of 2024 Actions

Table 2 provides several representative examples of actions taken to maintain Inter-War Era housing in 2024 pursuant to the Program Comment. It is noted that both in-kind and imitative substitute building materials are being used to replace highly damaged and deteriorated historic materials.

Table 2: Examples of Actions to Maintain Inter-War Era Housing during 2024

Installation	Action	Number of Units
Joint Base Lewis McChord, WA	Rotting wood replacement side panels	1
Joint Base Lewis McChord, WA	Removal and replacement of windows	1
Joint Base Lewis McChord, WA	Removal and replacement of dry rot on dormers and front porch	2
Joint Base Lewis McChord, WA	Removal and replacement of dry rot on shed	2
Joint Base Lewis McChord, WA	Removal and replacement of dry rot on dormer	3

Schofield Barracks, USAG Hawaii, HI	Kitchen renovation	1
Joint Base Lewis McChord, WA	Repair and replacement of sidewalks	NA
Joint Base Lewis McChord, WA	Replacement of brick stairs and sidewalks	NA
Fort Knox, KY	GOQ Rehabilitation Phase 1, Whole house rehabilitation	4
Joint Base Lewis McChord, WA	Quarters 1 railing replacement	1
Fort Moore, GA	Window replacement	202
Fort Moore, GA	Window trim replacement	492
Fort Belvoir, VA	In-kind replacement of wood windows	84
Fort Belvoir, VA	Installation of faux slate siding	77
Fort Sill, OK	Roof replacement with faux ceramic tiles	18



Dormer at Joint Base Lewis McChord with dry rot replaced (JBLM 2024)



JBLM window prior to replacement (JBLM 2024)



JBLM window after replacement of faulty units (JBLM 2024)

Summary of 2024 Demolition Procedures

A demolition procedure for Army Inter-War Era housing was established in section 3.2.5.1 of the Program Comment. The demolition procedure includes evaluating the condition of the building, considering prudent and feasible alternatives to demolition, preparing a Building Disposition Report, soliciting comments on the Building Disposition Report, and submitting a Major Decision Package.

In 2023, Joint Base Meyer-Henderson Hall (JBM-HH) proposed the 2024 demolition of Inter-War era properties including two residential garages, seven Non-Commissioned Officer (NCO) duplexes, one swimming pool, and one pool house in order to construct two unaccompanied enlisted personal housing barracks and associated parking. A BDR was developed and submitted to the ACHP for review on 29 September 2023. The ACHP's response letter dated 27 October 2023 stated that JBM-HH applied the demolition procedures provided within the Inter-War Era PC and in accordance with those procedures, the BDR includes the application of the demolition criteria, analysis of the properties current condition and utilization, and evaluation of alternatives. The ACHP concluded that the JBM-HH BDR meets the requirements set forth in the procedures and the ACHP had no additional comments.

In January 2024, a BDR was submitted to the ACHP for Rice Manor—a neighborhood in Fort Shafter, USAG Hawaii. Following demolition, the land will be returned to the State of Hawaii Department of Education and a new elementary school will be constructed. In February 2024, the ACHP wrote that there were no deficiencies in the BDR.



October 27, 2023

Colonel Tasha N. Lowery
Commanding
Department of the Army
Joint Base Myer Henderson Hall
204 Lee Avenue
Fort Myer, Virginia 22211-1199

Ref: *Building Disposition Report for Demolition of Properties at Joint Base Myer- Henderson Hall
Fort Myer, Arlington County, Virginia
ACHP Project Number: 18977*

COL Lowry:

On Friday September 29, 2023, the Advisory Council received the Building Disposition Report (BDR) in accordance with the *Department of the Army Program Comment for Inter-War Era Housing, Buildings and Structures, and Landscape Features 1919-1940 (Inter-War PC)* for the proposed demolition of two residential garages, seven Non-Commissioned Officer duplexes, one swimming pool, and one pool house at Joint Base Myer-Henderson Hall (JBM-HH).

JBM-HH has applied the demolition procedures provided within the Inter-War PC Design Guidelines. In accordance with those procedures, the BDR includes the application of the demolition criteria, analysis of the properties current condition and utilization, and evaluation of alternatives. The BDR meets the requirements set forth in the procedures and the ACHP has no additional comments.

Should you have any questions or require additional assistance, please contact Megan Borthwick at (202) 517-0221 or by e-mail at mborthwick@achp.gov and reference the ACHP Project Number above.

Sincerely,

Christopher Koeppl
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section



February 28, 2024

Colonel Steven B. McGunagle
Commanding
United States Army Garrison, Hawaii
745 Wright Avenue, Building 107
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857

Ref: *Demolition of Rice Manor, Department of the Army Inter-War Program Comment*
Fort Shafter, USAG Hawaii, Oahu, Hawaii
ACHP Project Number: 02051

Dear COL McGunagle:

On January 24, 2024, the Advisory Council on Historic Preservation (ACHP) received a Building Disposition Report (BDR) in accordance with the Program Comment for Department of the Army Inter War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919–1940) (Program Comment), for the demolition of the Rice Manor and associated landscape features at Fort Shafter on Oahu. The Program Comment covers maintenance actions for Army Inter-War Era housing which includes housing built between 1919-1940, extended to 1943 for housing constructed in Hawaii.

Section 3.2.5 of the Program Comment requires the Army to prepare a BDR for proposed demolitions. The BDR for Rice Manor and associated landscape features includes a description of the current conditions, evaluation of alternatives, and documentation of the neighborhood and its features. The BDR noted that the Army has not identified any additional historic properties in the area or salvageable materials from Rice Manor neighborhood. The process specified in the Program Comment will be followed in the case of an unanticipated discovery. There appears to be no major deficiency in the documentation provided.

Should you have any questions or require additional assistance, please contact Megan Borthwick at (202) 517-0221 or by e-mail at mborthwick@achp.gov and reference the ACHP Project Number above.

Sincerely,

Christopher Koeppl
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section

ADVISORY COUNCIL ON HISTORIC PRESERVATION
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VI. Army Federal Preservation Officer National Historic Landmarks Policy Memorandum for Inter-War Era Housing

In meeting the treatment measure specified in Program Comment Section 3.4.f, the Army FPO issued a NHPA policy memorandum regarding Inter-War Era housing National Historic Landmarks (NHL) entitled *Preservation of Army Inter-War Era National Historic Landmark Housing (1919-1940)*. The NHL policy memo is posted on the Program Comment website. Implementation of this treatment measure is complete. The policy memorandum underscores that 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.” The Army has 213 Inter-War Era housing units that are contributing elements to three Army NHL districts:

- Two-hundred-and-six units within the NHL district at West Point, New York
- Six units within the NHL district at Fort Myer, Virginia, and
- One unit within the NHL district at Fort Shafter, Hawaii.

The policy memorandum clearly states that the Program Comment is not applicable to Inter-War Era housing units that are NHL properties, and that the Army will continue to comply with NHL regulatory requirements including NHPA Section 110(f), 35 CFR 800.3 - 800.7, and 36 CFR 800.10.

VII. Army Program Comment Website Activities

The Army maintains an archive of extensive documentation regarding the history of Army Inter-War Era housing. These public educational and reference materials have been consolidated and are maintained by the Army on a publicly accessible website located at <https://www.denix.osd.mil/army-pchh/home/>. The website was established by the Army in 2019 for the purposes of documenting the Program Comment consultation with interested parties and was redesigned in September 2020 after the ACHP issued the Program Comment. The website redesign was undertaken to better facilitate public access to information in accordance with the Program Comment. Thus, the website now provides clear and easy public access to Army Inter-War Era housing historical information and associated documents as well as the archival administrative record pertaining to the development of the Program Comment. Program Comment implementation materials, including the Program Comment, Design Guidelines, Building Materials Catalog, and the NHL policy memorandum, are also posted on the front page of the website, along with annual reports, technical documents, media links, and Army historic preservation public outreach materials. The website also contains an archive section where Program Comment consultation process materials can be found.

In addition, the Army Historic Preservation and Cultural Resources Management website at www.denix.osd.mil/army-cr/home/ provides an easily accessible, centralized location for all Army-wide NHPA and Native American-related policy and compliance documents. The website contains all current Department of the Army NHPA related strategy and policy documents, all Army-wide and applicable DoD-wide NHPA Program Comments and agreements, the Department of the Army’s Native American policy and guidance, and baseline information regarding historic Army housing periods and geographic

distribution. The Army Historic Preservation and Cultural Resources Geographical Information Systems (GIS) StoryMap, available at www.denix.osd.mil/army-cr/home/, highlights the entire suite of Army historic preservation and cultural resources including Army NHLs, historic housing and archaeological resources. The StoryMap contains an interactive web-based tour of Army Inter-War Era housing that includes photographs and style information for each installation that has Inter-War Era housing.



VIII. Public Education/Social Media Activities



2024 Social Media Activities:



The Army is conducting its social media outreach using Twitter, rebranded as X in 2023, and provided monthly posts, now referred to as “posts”, published to <https://x.com/DENIXnews> (link to the X page is also provided on the Program Comment webpage). The 2024 posts were posted every month. The Army received 736 views of its X posts during the reporting period. The posts and their associated X activity is provided in the following Table:


Table: 2024 Program Comment Social Media / X (Twitter) Summary

2024 Program Comment Social Media / Twitter Summary		
Posted Date	Post Content	Total Views
Jan. 2, 2024	<p>Post 1: The Army’s use of <i>imitative substitute building materials</i> under the Program Comment for Army Inter-War Era Housing (1919-1940) follows established criteria and procedures approved by the Advisory Council on Historic Preservation.</p> <p>Post 2: The use of <i>imitative substitute building materials</i> reduces costs and allows full implementation of scopes of work that improves preservation of Army Inter-War Era housing.</p> <p>Post 3: The Army is currently seeking a similar solution for pre-1919 housing, check it out here: https://www.denix.osd.mil/army-pre1919-pchh/.</p>	116
Feb. 1, 2024	<p>Check out the Army’s 2023 Program Comment Annual Reports for Inter War Era and Vietnam War Era housing at https://www.denix.osd.mil/army-pchh/ and https://www.denix.osd.mil/army-vwehh-pc/</p>	31

2024 Program Comment Social Media / Twitter Summary		
Posted Date	Post Content	Total Views
Mar. 11, 2024	<p>Post 1: The @USArmy submitted the Program Comment for the Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features (program comment) to the @usachp for action on March 4, 2024.</p> <p>Post 2: The Program Comment will help to preserve historic Army housing built before 1919, such as the Superintendents quarters at West Point built in 1820, while balancing the responsibility to provide military families with the quality of life, health and safety they deserve.</p> 	107
Apr. 2, 2024	<p>Read more about the Fort McCoy, Wisconsin artifact collection that contains more than 600,000 artifacts here: https://www.dvidshub.net/news/463248/fort-mccoy-archaeology-artifacts-posts-piece-driftless-area-find-home-mississippi-valley-archaeology-center</p>	33
May 3, 2024	<p>Army Archeological Field Work: US Army Garrison Hawaii Cultural Resource Management Program conducts archeological investigations at Makua Military Reservation, Oahu, HI. (Photo Courtesy US Army Garrison Hawaii)</p> 	49

2024 Program Comment Social Media / Twitter Summary		
Posted Date	Post Content	Total Views
Jun. 5, 2024	Great News for the Army! On May 17th 2024, @USACHP members approved the Program Comment for Pre-1919 Historic Army Housing. Check it out here https://www.achp.gov/news/achp-members-approve-program-comment-historic-army-housing .	26
Jul. 2, 2024	<p>It's official! On June 13, 2024, the @USACP published its Notice of Issuance of the @USArmy Program Comment for the Preservation of Pre-1919 Historic Army Housing in the Federal Register. Check it out here: https://www.federalregister.gov/d/2024-13045</p> 	37
Aug. 2, 2024	<p>Post 1: The Army's Program Comment for Pre-1919 housing reflects a shift occurring in historic preservation that prioritizes the needs of people living in and managing historic homes equally with preservation of the material integrity of the homes.</p> <p>Post 2: View the Program Comment at https://www.denix.osd.mil/army-pre1919-pchh/.</p> 	45

2024 Program Comment Social Media / Twitter Summary		
Posted Date	Post Content	Total Views
Sep. 3, 2024	<p>Post 1: NHPA compliance for over 99% of the Army's inventory of 30,649 historic homes has now been completed by four nation-wide Program Comments.</p> <p>Post 2: The Program Comments address Army Pre-1919 Housing, Army Inter-War Era housing (1919-1940), Army Capehart-Wherry Housing (1949-1962), and Army Vietnam War Era housing (1963-1975).</p> <p>Post 3: Check out this example of pre-1919 Army housing at Fort Sill, OK. Learn more by visiting www.denix.osd.mil/army-cr/home/</p> 	75
Oct. 1, 2024	<p>Post 1: The Army is effectively executing four Program Comments addressing over 29,000 historic homes, including those designated as National Historic Landmarks.</p> <p>Post 2: The Program Comments were approved by the Advisory Council on Historic Preservation, follow standardized procedures, and eliminate the need for individual project-by-project reviews.</p> <p>Post 3: For more information on these cutting-edge initiatives, visit www.denix.osd.mil/army-cr/home/</p> <p>Post 4: Fort Leavenworth Pre-1919 NHL Housing.</p> 	82

2024 Program Comment Social Media / Twitter Summary		
Posted Date	Post Content	Total Views
Nov. 1, 2024	<p>Post 1: The Minnesota National Guard welcomed Native American tribal members to Camp Ripley Training Center near Little Falls, Minnesota, for the annual Planting for the Future event on October 15th, 2024.</p> <p>Post 2: The event included a sage harvest and planting of prairie wildflowers, as well as discussion of how the plants are used in the daily lives of tribal members (Minnesota National Guard Photo by Army Staff Sgt. Jorden Newbanks).</p> 	86
Dec. 17, 2024	<p>Post 1: Exciting news! A new national monument is located on 24.5 acres of the @USArmy's Carlisle Barracks.</p> <p>Post 2: The monument proclamation was signed by President Biden on Dec 9, 2024.</p> <p>Post 3: This site holds a significant piece of Native American history honoring the complex and painful history of the Indian Boarding Schools operated by the Department of the @Interior.</p> <p>Post 4: It encompasses the historic buildings & structures of the former Carlisle Indian Industrial School, which was the first of many Department of the Interior Indian boarding schools.</p> <p>Post 5: Check out the proclamation here: https://www.whitehouse.gov/briefing-room/presidential-actions/2024/12/09/a-proclamation-on-the-establishment-of-the-carlisle-federal-indian-boarding-school-national-monument/</p>	49

IX. Building Materials Lifecycle Data

Building materials lifecycle data tracking is identified under Program Comment Section 3.2.4 *Lifecycle Data Tracking for In-Kind Building Materials and Imitative Substitute Building Materials Used in Army Inter-War Era Housing*. The Army is tracking lifecycle data for in-kind and imitative substitute building materials used on 361 Inter-War Era housing units present on two Army installations. These data are

provided in the Appendix to this annual report. Building material performance is being tracked at one installation located in the Mid-Atlantic region for in-kind wood replacement windows, synthetic (faux) slate roofing, and fiber cement siding, while a second installation located in the Southeast region is tracking for vinyl replacement windows and PVC window trim. A total of over 3,000 building material lifecycle data points are being tracked in this effort. Performance data are collected at the housing unit level and reported annually from 2020 to 2025; performance data will then be collected and reported at five-year intervals, in 2030, 2035, 2040, 2045, 2050, and 2055. Table 4 details the in-kind building material and imitative substitute building materials that are being tracked in 361 Inter-War Era historic housing units.

Table 3: Building Materials Lifecycle Tracking and Associated Number of Housing Units

Material	Number of Housing Units
Windows, vinyl replacement	202
PVC window trim	202
Windows, in-kind wood replacement	83
Synthetic slate roofing	76
Fiber Cement Siding	76

The building materials lifecycle data points tracked and reported in the Appendix to this annual report include:

- Housing Unit Number
- Date of Housing Unit Construction
- Year New Material Installed (initial installation)
- Year New Material Replaced - this information will be filled out as the material is replaced
- Total Lifecycle of New Material - lifecycle will be calculated at the time of replacement of new material (number of years)
- Lead Paint Hazard Removed (Y/N/ Not Applicable)
- Warranty (Y/N)
- Warranty (# years)
- Warranty Terms of Replacement - includes information regarding terms of replacement (if any)

As of the date of this report, no imitative substitute building materials being tracked have required replacement. The Army will amend, update, and correct these lifecycle data, as needed, to ensure their accuracy.

X. Summary Review

Program Comment section 5.1 requires that the Program Comment Annual Report include a summary review of decisions made for housing demolition; any known future demolition proposals; significant issues or misunderstandings that may have arisen in the course of applying the Program Comment, how those

were addressed, and how they may be avoided in the future; and an assessment of the overall effectiveness of the Program Comment in meeting its intent and purpose.

There have been no major or significant issues or misunderstandings that have arisen in the course of applying the Program Comment during the 2024 reporting period. Regarding the overall effectiveness of the Program Comment, Army 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 the repair or replacement of building materials will be required for Inter-War Era housing at multiple locations. The building materials selection criteria and procedures will be followed for each action. Those activities will be reported in the 2025 Annual Report. The Army is confident that our implementation of ongoing Program Comment training programs, and our sustained professional assistance, technical support, oversight, and monitoring will ensure that the historic and architectural character of the housing is maintained while implementing actions under the Program Comment that improve the quality of life and overall material living conditions of our military families.

Implementation of the Program Comment is proceeding well and meeting the goal and objective of the document. No problems have been encountered and no amendments to the Program Comment are required.