



Inspector General

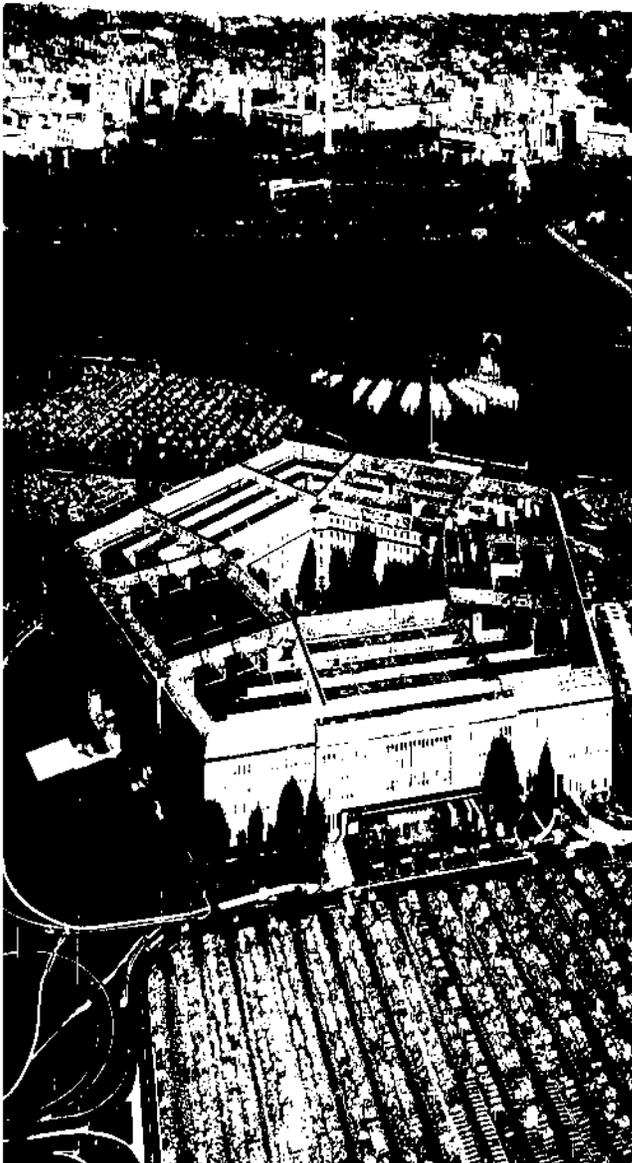
Department of the Army



Date
Report ID-1903

**Department of the Army Inspector
General Special Interest Item Assessment
of the Residential Communities Initiatives
(RCI)**

14 February – 22 March 2019



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Finding 9 Recommendation

Recommendation 19

IAW HQDA EXORD 102-19 ARMY HOUSING CRISIS ACTION RESPONSE, ACSIM, ICW Commanders of Army Commands (ACOM), Army Service Component Commands (ASCC), Direct Reporting Units (DRU), with senior commanders of posts with Army housing, continue to maintain a command hotline at each installation to respond to Army housing concerns of Soldiers and Families (Para 3.C.12.A.7.). (Complete)

Finding-10 (Observation)

Historical houses present unique challenges to the Army, RCI companies, and tenants.

Discussion

Standards.

- Part 68, Title 36, Code of Federal Regulations (36 CFR 68).
- Part 800, Title 36, Code of Federal Regulations (36 CFR 800).

What We Found. There are 25 Army installations with homes classified as historic. The total number of historic homes is 4,056, which represents approximately 5% of the total number of privatized homes. SCs and GCs at all (25 of 25, 100%) of these installations, stated historic homes present unique challenges to the Army, private company property managers, and residents. These challenges lie in the rules and laws regarding historic homes, energy efficiency and specialized maintenance requirements. The inspection team conducted a review of the various guidelines governing historic homes. The U.S. Secretary of the Interior's Standards for Treatment of Historic Properties (36 CFR 68) provides guidelines regarding how historic homes are managed. The addition of various state historic preservation laws and rules further complicates matters with additional requirements and processes. Collectively, these guide the development of Programmatic Agreements between each state and the U.S. Army garrison concerning the management of historical properties. Programmatic Agreements include the management of all historic properties and historic homes on Army installations. They prescribe rules and guidelines governing renovations, improvements, repairs, etc. These rules and governing documents present two challenges to both the Army and the private company. The first is the consultation process outlined in 36 CFR 800. If the Army or the private company at an installation want to deviate from the standards in the CFR to mitigate repair or operating and maintenance challenges, they must request a Section 106 process outlined in 36 CFR

800. The consultation process is highly procedural and time-consuming. The second challenge is the interaction with various State Historic Preservation Officers (SHPO). As part of the consultation process, the SHPO has the right to review and comment on all improvements and/or alterations to historic homes. Although SHPO does not have final approval regarding renovation scope, their review and comment creates a perception the SHPO has approval authority.

Historic homes are more costly to operate and maintain. Typically they are less energy-efficient and require specialized materials and specially trained personnel to repair damages or execute renovation scope. These homes also have unique health or safety concerns such as lead-based paint or asbestos. In addition, these homes are often very costly to renovate, and there are strict rules about the craftsmanship and types of materials that can be used. Examples of these restrictions include the use of custom windows, custom roofing, or the use of plaster versus drywall. These restrictions can also vary by home and by installation. For example, at one installation, various historic homes may have multiple-sized windows that must be custom made. This further complicates repair and renovation projects and increases the cost and timeliness to complete the work.

Root Cause. N/A

Finding 10 Recommendation

Recommendation 20

ASA (IE&E) ICW ACSIM and AMC review/assess the feasibility of continuing the historic home programmatic agreements, to include conducting a cost benefit analysis.