



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

September 19, 2023

Mr. Reid Nelson  
Executive Director,  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Via email to [rmelson@achp.gov](mailto:rmelson@achp.gov)

Dear Mr. Nelson,

I am writing to notify you of the Department of the Army's intent to request a *Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features* pursuant to 36 CFR 800.14 (e). The need for this proposed program comment is based on the Army's obligation to provide quality housing for our Soldiers and their families. The intent of this program comment is to provide the Army compliance with National Historic Preservation Act (NHPA) for the repetitive management actions occurring on the Army's large inventory of pre-1919 housing.

The Army believes a Program Comment is the best NHPA compliance solution for our inventory of pre-1919 housing. This decision is based on extensive discussions and analyses that occurred during a series of high-level meetings held by the Army in July and August 2023 with senior leaders from the Advisory Council on Historic Preservation (ACHP), the Department of the Interior, and other stakeholders. The decision is also informed by the successes of the three ACHP approved program comments currently in effect for historic Army housing (Program Comment for Army Inter-War Era housing 1919-1940, Program Comment for Army Capehart-Wherry housing 1949-1962, and the Program Comment for Army Vietnam War Era housing 1963-1975).

The Army's best available information indicates there are 865 pre-1919 homes located on 18 installations in 14 states. Among these, there are 10 installations where pre-1919 housing has been designated as National Historic Landmarks (NHLs), primarily as contributing properties to NHL districts. Over 70% of pre-1919 Army homes are assessed as designated NHLs. The Army's decision to seek a program comment for its inventory of pre-1919 housing demonstrates compliance with NHPA Section 306102(b)(2) and Section 306107 for these NHLs. Through this program comment planning process, the Army is giving special consideration and exercising a higher standard of care for pre-1919 NHL housing.

The effects of this proposed program comment on pre-1919 historic Army housing are determined by the category of undertaking, termed *management actions*. Management actions are for the purposes of this proposed program comment defined as: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, lease, transfer, and

conveyance (in support of the housing privatization program), and the use of imitative substitute building materials in implementation of management actions. In general, the likely effects of these management actions on pre-1919 Army housing are not adverse and promote the long-term preservation of NHL and other pre-1919 Army housing.

The standard set of management actions approved by the ACHP in the Army's prior program comments for historic housing also includes cessation of maintenance, demolition, and new construction. However, due to the special considerations required by NHPA Section 306102(b)(2) and Section 306107 for NHLs and properties with national level significance, the Army is holding this proposed program comment for pre-1919 housing to a higher standard than prior Army program comments. The Army is excluding cessation of maintenance, demolition, and new construction from consideration under this proposed program comment. Exclusion of these adverse effect actions from this program comment demonstrate that the Army is planning and taking action to minimize harm to pre-1919 NHL homes to the maximum extent possible.

The Army will implement the following steps to take into account effects of the proposed program comment. The Army will prepare a Program Comment Plan, publish a public notice of intent in the Federal Register to seek a program comment and request public comment on the Program Comment Plan. The Army will invite the ACHP, State Historic Preservation Officers, Tribal Historic Preservation Officers, federally recognized tribes, and non-governmental historic preservation advocacy organizations (including the National Trust for Historic Preservation, National Conference of State Historic Preservation Officers, and the National Association of Tribal Historic Preservation Officers) to participate in a series of nation-wide consultation meetings to further inform development of the program comment. If adopted, the program comment would remain in effect from the date of adoption by the ACHP through December 31, 2055. This effective time period synchronizes the program comment with the duration of the Army's housing privatization program. The majority of pre-1919 Army homes are managed under the Army's privatized housing program.

The Army intends to submit its formal request to the ACHP for action on the program comment on or about January 31, 2024. As previously discussed, the Army appreciates your cooperation and assistance in expediting the program comment process.

Thank you for your continued support and interest in the care and well-being of our Soldiers and their families.

Sincerely,

David Guldenzopf, Ph.D.  
Department of the Army Federal Preservation Officer