



# U.S. ARMY

## CONSULTATION CONFERENCE #3:

# PROPOSED PROGRAM COMMENT FOR PRESERVATION OF PRE-1919 HISTORIC ARMY HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES



Controlled by: Headquarters, Department of the Army  
Controlled by: ASA IE&E  
Distribution: Statement A  
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UNCLASSIFIED

## **PURPOSE**

To inform stakeholder consultation regarding the proposed *Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features*.

## **PROGRAM COMMENT PLAN**

The Army's **Program Comment Plan** along with this briefing and other information is posted on the Program Comment website <https://denix.osd.mil/army-pre1919-pchh/>. Interested parties should review the Program Comment Plan since it informs this series of consultation conferences.

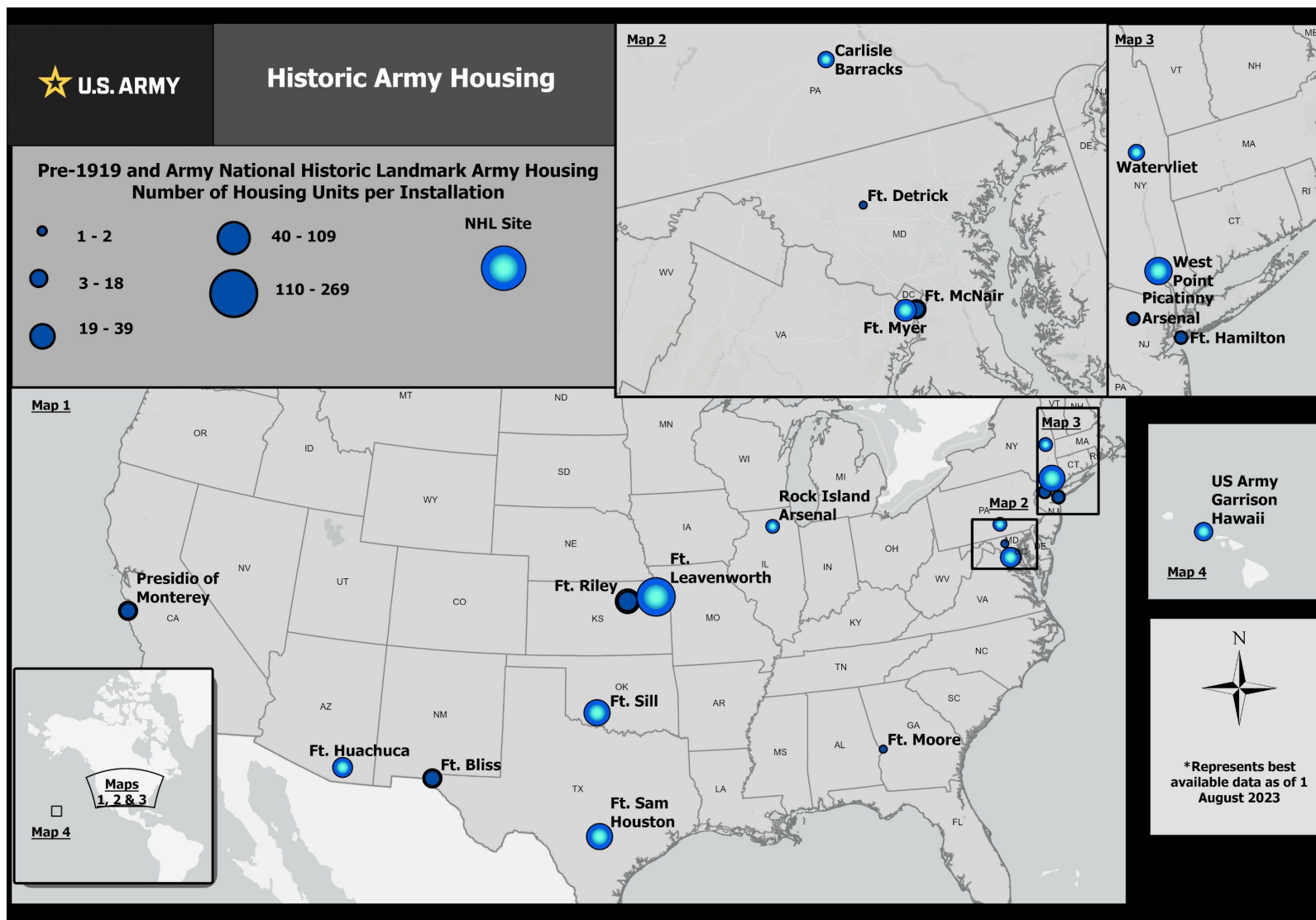
## **AGENDA - CONSULTATION CONFERENCE #3**

### **I. CATEGORY OF UNDERTAKING**

### **II. LIKELY EFFECTS**

\* Learn more about Department of the Army historic preservation and cultural resources by visiting [www.denix.osd.mil/army-cr/home/](http://www.denix.osd.mil/army-cr/home/).

# Distribution Map of Pre-1919 Army Housing



Installation	Pre-1919
Fort Leavenworth, KS	269
Fort Riley, KS	109
Fort Sam Houston, TX	91
West Point, NY	84
Fort Sill, OK	73
Fort Bliss, TX	39
Fort Huachuca, AZ	38
Presidio of Monterey, CA	37
Fort Myer, VA	34
Fort McNair, DC	27
Carlisle Barracks, PA	18
US Army Garrison HI - Fort Shafter	17
Watervliet Arsenal, NY	8
Rock Island Arsenal, IL	6
Fort Hamilton, NY	6
Picatinny Arsenal, NJ	6
Fort Detrick, MD	2
Fort Moore, GA	1
<b>Total</b>	<b>865</b>



## Examples of Pre-1919 Army Housing



Fort Leavenworth, KS



Fort Riley, KS



Fort Sam Houston, TX



Fort Shafter, HI



Fort Sill, OK



West Point, NY



Rock Island Arsenal, IL



Fort McNair, DC

## **I. CATEGORY OF UNDERTAKING**

- The category of undertaking for this program comment is termed *management actions*.
- For this program comment, management actions are defined as: *maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, lease, transfer, and conveyance (in support of the housing privatization program)*.
- The standard set of management actions approved by the ACHP in our three prior program comments for historic Army housing includes *cessation of maintenance, demolition, and new construction*. However, due to the special considerations required by NHPA Section 306102(b)(2) and NHPA Section 306107 for National Historic Landmarks (NHLs) and properties with national level significance, the Army is holding this proposed program comment for pre-1919 housing to a higher standard of care 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 demonstrates that the Army is planning and taking action to minimize harm to pre-1919 NHL homes to the maximum extent possible.

## **II. LIKELY EFFECTS**

- The effects of this proposed program comment on pre-1919 historic Army housing are determined by the category of undertaking, termed *management actions*.
- The Army is excluding adverse effect actions (*cessation of maintenance, demolition, and new construction*) from consideration under this program comment.
- Therefore, the likely effects of the management actions on pre-1919 Army housing are not adverse and in fact promote the long-term preservation of NHL and other pre-1919 Army housing.
- Army is planning and taking action to minimize harm to pre-1919 NHL homes to the maximum extent possible.

## **II. LIKELY EFFECTS**

- The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act (63 FR 20496) provide the National Park Service's official guidance to agencies regarding treatment of NHLs.
- The standard and guidelines at 4(j) National Historic Landmarks, state that Federal agencies should exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs.
- National Park Service guidance to federal agencies regarding NHLs at 4(j) states when alternatives to avoid an adverse effect on NHLs appear to require undue cost or to compromise the undertaking's goals and objectives, the agency must balance those goals and objectives with the intent of Section 306107.
- In doing so, the guidance to agencies is that they should consider the magnitude of the undertaking's harm to the NHL, public interest in the NHL and the effect a mitigation action would have on meeting the goals and objectives of the undertaking.
- Army is avoiding adverse effects by limiting the scope of management actions to those actions that are not adverse and by built-in mitigation measures such as presentation of extensive historic context and documentary research, HABS documentation of the homes, the building materials selection criteria and procedures, and the pre-1919 housing design guidelines and building materials catalog.