



# U.S. ARMY

**SUPPLEMENTAL INFORMATION BRIEFING:  
PROPOSED PROGRAM COMMENT FOR PRESERVATION OF  
PRE-1919 HISTORIC ARMY HOUSING, ASSOCIATED BUILDINGS AND  
STRUCTURES, AND LANDSCAPE FEATURES**



UNCLASSIFIED

## **PURPOSE:**

Provide supplemental information to inform consultation regarding the proposed *Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features*.

## **AGENDA:**

- I. FACTS BEARING ON THE ISSUE
- II. HISTORIC HOUSING IS MORE COSTLY TO OPERATE, MAINTAIN, AND IMPROVE
- III. CASE STUDIES: PROGRAM COMMENT FOR INTER-WAR ERA ARMY HOUSING (1919-1940)
- IV. CONGRESSIONAL ACTION ON PRE-1919 HOUSING
- V. PROGRAM COMMENT FOR PRE-1919 HOUSING: A 21ST CENTURY APPROACH

\* 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/).

## **I. FACTS BEARING ON THE ISSUE:**

### **ARMY INSPECTOR GENERAL REPORT, 2019:**

- Historic Housing Finding – Historic homes are more costly to operate, maintain, and renovate; require special historic building materials and specialized craftsmen; health and safety concerns such as lead paint and asbestos are present; restrictive floorplans; the processes in the National Historic Preservation Act (NHPA) installation-level Programmatic Agreements (PAs) for historic housing are highly procedural, time consuming, with variable standards.
- Army Inspector General Recommendation: Assess the feasibility of continuing the installation-level PAs for historic housing.

### **PRE-1919 HISTORIC ARMY HOUSING FORUM, 15 JUNE 2023, FORT MCNAIR, WASHINGTON DC:**

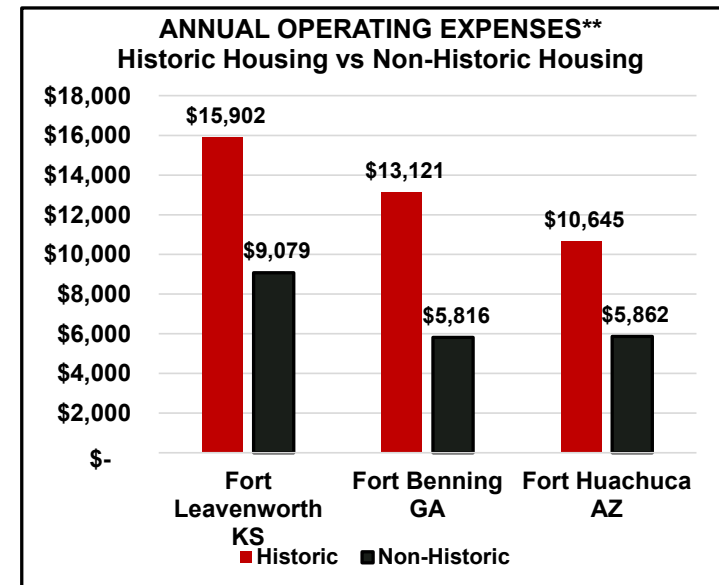
- The Assistant Secretary of the Army for Installations, Energy and Environment hosted a meeting to discuss pre-1919 Army housing NHPA compliance issues and program alternatives with other senior leaders including the Chairman, Advisory Council on Historic Preservation (ACHP); Assistant Secretary of the Interior; Associate Director, National Park Service; Executive Director, ACHP; and Executive Director, National Conference of State Historic Preservation Officers. There was general agreement among the senior leaders that a nationwide programmatic NHPA compliance approach to pre-1919 Army housing is needed.

**CONGRESSIONAL REQUIREMENT FOR DEMOLITION OF PRE-1919 HOUSING:** The Fiscal Year 2023 National Defense Authorization Act requires the Army to demolish three pre-1919 homes at Fort McNair.

**QUALITY OF LIFE, HEALTH, AND SAFETY ISSUES** are prevalent in pre-1919 Army housing and include asbestos and lead-based paint hazards, obsolete electrical, plumbing, and HVAC systems, and structural deterioration.

## II. HISTORIC HOUSING IS MORE COSTLY TO OPERATE, MAINTAIN, AND IMPROVE

- The annual costs to operate historic Army housing far exceeds the cost to operate non-historic privatized homes.
- When compared to non-historic homes, historic homes require additional funds for both maintenance and turn-over of between 20% to 100%, and an additional 30% to 40% in capital improvement funds.\* Homes turn over every two to three years as soldiers and their families are reassigned.
- Non-historic homes cost less to maintain and improve, replacement parts and materials are less costly, easier to obtain and install, and no abatement of lead-based paint or asbestos is needed.



\* Source: Army Privatized Housing Consultant to Capitol Ventures Directorate, ASA IE&E

\*\* Source: Army Privatized Housing Partner

- **EXAMPLES OF REHABILITATION COSTS AND ISSUES UNDER INSTALLATION PROGRAMMATIC AGREEMENTS:\***
  - Roofs – clay tiles of a specific size no longer manufactured but required by SHPO increased costs \$100k per home to manufacture and install.
  - Gutters – SHPO required replacements in copper cost up to ten times more than similar aluminum gutters.
  - Windows – rehabilitating historic windows has \$50K to \$100K per home in additional costs.
  - Siding – An additional \$50K per home spent to manufacture and install wooden cedar shake siding of specific size that is no longer manufactured. Modern faux cedar shake siding was not acceptable to SHPO.
  - The average estimated additional preservation-related cost to renovate historic homes under current installation PAs is approximately \$100K-150K per housing unit.
  - Project-by-project review per installation PAs typically adds an additional six months or more to the renovation process.
  - Historic Architect Services – Partners have spent over \$100K for historic architect services.

\*Source: Army Privatized Housing Partners

- **EXAMPLES OF REHABILITATION COSTS AND ISSUES UNDER INSTALLATION PROGRAMMATIC AGREEMENTS:\***
  - “The PA process is cumbersome and costly, negatively impacts customer service, and ironically, has a negative effect on the overall condition of the properties.”
  - “The original scope of the renovation was much more extensive, but it had to be dialed back because of required Marvin wood windows with true divided lite which cost between \$40K-\$50K on some homes. There was also wood panels with LBP on the exterior that could have been removed and replaced, but the renovation couldn’t afford that scope after the window selection.”
  - “The exterior of the home must remain true to the historic materials. Therefore, we are being required to go back with copper gutters (\$70-\$100/l.f.) and flashing (approx. \$20K add). The roofs took approx. 2 ½ years of negotiations.”
  - “Housing has wood siding that has tested positive for lead based paint. The average budget for the renovation was approximately \$50K per house. It would have cost double or triple that to remove the siding and replace it with a similar wood siding as SHPO required. If we were permitted to encapsulate the siding with a vinyl shake it would have cost a fraction of what the wood would cost and be significantly less for Operations to maintain.”
  - “We have been trying to get replacement windows in two neighborhoods since 2007.”

\* Source: US Army Garrison Housing Managers.

### III. CASE STUDIES: PROGRAM COMMENT FOR INTER-WAR ERA ARMY HOUSING (1919-1940)

- As approved by the ACHP in 2020, the Army's implementation of the Program Comment for Army Inter-War Era Housing (1919-1940) and its criteria and process for selection of building materials is proof of concept as demonstrated by the Annual Reports submitted to the ACHP at <https://www.denix.osd.mil/army-pchh/>.
- The Program Comment for Army Inter-War Era Housing includes criteria and procedures for repair of historic building materials and, if replacement is necessary, procedures for selection and use of either in-kind building materials or imitative substitute building materials. This process has resulted in millions of dollars in savings in rehabilitation of Inter-War era Army housing, improved the quality of life, health and safety of occupants, upgraded climate resiliency and energy efficiency while preserving the historic character of Inter-War Era housing and historic districts.
- When historic materials require replacement, both in-kind and imitative substitute building materials have been used as replacement materials under the Program Comment for Army Inter-War Era Housing. The imitative substitute building materials used for roofing, windows, and other applications are **reversible** and can be replaced with in-kind building materials at any point in the future.
- The Program Comment for Army Inter-War era housing also has reduced the lengthy project-by-project review processes required in the installation-specific PAs that was impacting Soldiers and families waiting to occupy the housing.

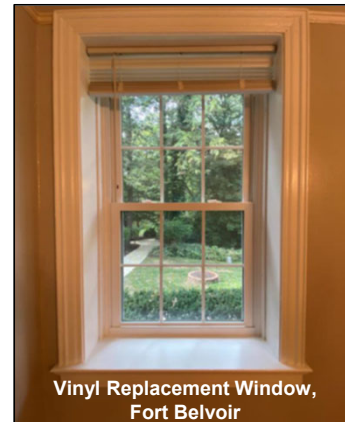


**CASE STUDY: PROGRAM COMMENT FOR INTER-WAR ERA HOUSING (1919-1940)**

**Imitative Substitute Building Materials:** The use of imitative substitute building materials follows a Program Comment materials selection procedure that implements the Secretary of the Interior Standards and treats quality of life, health, safety issues in balance with preservation goals.

**Fort Belvoir Inter-War Era Housing Window Replacement\*:**

Fort Belvoir Window Type	Cost per Home	Completion Time per Home	Warranty
Historic window repair	\$120,000	120 days	None
In-kind wood replacement	\$80,000	30-45 days	20-year
Vinyl replacement	\$30,000	14 days	40-year



- **Cost Effective:** Total Project Cost Savings of \$5.0 million for Fort Belvoir window replacement project using imitative substitute vinyl windows.
- **Benefits:** Imitative substitute vinyl windows have significantly lower initial cost, reduce the time homes are off-line, lower long-term maintenance cost, eliminate the lead-based paint hazard, improve energy efficiency, and preserve the historic character of the Colonial Revival housing.

\* Source: Army Privatized Housing Partner



## CASE STUDY: PROGRAM COMMENT FOR INTER-WAR ERA HOUSING (1919-1940)

**Fort Bliss Inter-War Era Housing Clay Tile Roof Replacement With Metal Tile Roofing\*:** Metal tile roofing is a climate resilient imitative substitute building material used at Fort Bliss, TX to replace deteriorated historic clay tiles on 98 Spanish Revival style Army Inter-War Era homes.

- **The Imitative substitute roofing material maintains historic character and is more climate resilient and cost effective than in-kind materials.**
- **Climate Resiliency:** The metal tile roofing is more durable in extreme weather events with a Class 4 impact rating vs Class 3 rating for clay tile.
- **Cost Effective:** Saved \$2.2 million by using metal tile roofing vs use of higher-cost historic clay tile roofing.
- **Equivalent Life Cycle:** The metal tile roof has a 50-year warranty, same warranty period as a clay tile roof.
- **Lower Life Cycle Costs:** Result from lower maintenance requirements for metal tile roofing vs clay tile roofing.
- **Preserves Historic Character** of the Spanish Revival housing and historic district.
- **Implements ACHP's *Climate Change and Historic Preservation Policy*:** Incorporates the latest technological innovations and material treatments to improve climate resiliency while preserving the historic character of the housing.



Metal Tile Roofing on Spanish Revival Homes, Fort Bliss, TX



\* Source: Army Privatized Housing Partner

## IV. CONGRESSIONAL ACTION ON PRE-1919 HOUSING

### FY2023 NATIONAL DEFENSE AUTHORIZATION ACT:

***“DEMOLITION OF DISTRICT OF COLUMBIA FORT MCNAIR QUARTERS 4, 13 AND 15.***

*Not later than one year after the date on which all the individuals occupying District of Columbia Fort McNair Quarters 4, 13 and 15, as of the date of the enactment of this Act, have moved out of such Quarters, the Secretary of the Army shall demolish such Quarters.”*



## V. PROGRAM COMMENT FOR PRE-1919 HOUSING: A 21ST CENTURY APPROACH

- The current institutional paradigm in use for federal historic preservation was developed in the 20<sup>th</sup> century. It centers on Section 106 project-by-project reviews by SHPOs, and their strict application of the *Secretary's Standards* focused on preservation of the material integrity of historic buildings.
- Some preservationists are now questioning the current paradigm and seek a new paradigm for the 21<sup>st</sup> century. The recently published **Relevancy Guidebook: How We Can Transform The Future Of Preservation** (Landmarks Illinois, Nov 2023) states:  
*“The historic preservation movement faces a relevancy crisis because it is simply irrelevant to a large swath of the public. Preservation regulations are designed to protect historic material rather than prioritize the needs of people living in and using these places today.”*
- The Army’s proposed Program Comment for Pre-1919 Housing is a 21st century approach to 21st century issues of climate resiliency, energy efficiency, costs, and the quality of life, health, and safety of the occupants of historic homes. It reflects a shift to a preservation approach that prioritizes the needs of people living in and managing historic homes equally with preservation of material integrity.