

Administrative Record for Program Comment for Preservation of Pre-1919 Historic Army Housing
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Administrative Record for Program Comment for the Preservation of Pre-1919 Historic Army Housing
Notification of Consultation

Notification	Attachment A Page Number or Website Location	Date
Army Program Comment Notice to Advisory Council on Historic Preservation	Notice link https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/09/Program-Comment-Notice-to-ACHP-09192023.pdf	19-Sep-23
ACHP Reply to Army Program Comment Notification	Reply link - https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/10/ACHP-Army-Program-Comment-pre-1919-receipt.pdf	27-Oct-23
Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation	Invitation link https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2024/02/Invitation-to-Army-Program-Comment-Section-106-Consultation.pdf	23-Oct-23
Army Program Comment Consultation Notice to National Conference of State Historic Preservation Officers	Page 1 of Attachment A	23-Oct-23
Army Program Comment Consultation Notice to National Association of Tribal Historic Preservation Officers, and Tribal Leaders from all Federally recognized Tribes	Pages 3, 8, 13,15 of Attachment A	23-Oct-23
Army Program Comment Consultation Notice to Native Hawaiian Organizations	Page 6 of Attachment A	23-Oct-23
Army Program Comment Consultation Notice to Non-governmental historic preservation advocacy organizations (NCSHPO, NTHP, NATHPO, HHF)	Page 17 of Attachment A	23-Oct-23
Federal Register Notice of Availability Program Comment Plan	FR NOA Link https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/10/PC-Plan-for-Preservation-of-Pre-1919-Historic-Army-Housing.pdf	23-Oct-23

**Administrative Record for Program Comment for Preservation of Pre-1919 Historic Army Housing
Consultation Timeline**

Initial Meetings and Calls Timeline	
Initial Coordination	Date
Assistant Secretary of the Army for Installations, Energy and Environment held a meeting at Fort McNair, Washington DC	6/15/2023
Assistant Secretary of the Army for Installations, Energy and Environment Follow-up Meeting at Fort McNair, Washington DC	7/20/2023
Army FPO meeting with ACHP, NPS, and NCSHPO	8/24/2023
Army FPO discussion with ACHP Executive Director	8/24/2023
Army FPO Notification of Program Comment to ACHP	9/19/2023
Army Federal Register Notice of Availability for the Program Comment Plan	10/23/2023

Consultation - Meetings and Calls Timeline			
Program Comment Conference Calls	Date	Topic	Number of Participants
Program Comment Conference Call 1 https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/11/Consultation-Conference-1-Program-Comment-Pre-1919-Army-Housing-1.pdf	11/8/2023	Background, Introduction, Goal, Objective, Summary, Intent, Development Process, Outreach	31
Program Comment Conference Call 2 https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/11/Consultation-Conference-2-Program-Comment-Pre-1919-Army-Housing.pdf	11/15/2023	Program Comment Scope, Pre-1919 Housing Inventory, National Historic Landmark Status	29
Program Comment Conference Call 3 https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/11/Consultation-Conference-3-Program-Comment-Pre-1919-Army-Housing.pdf	12/1/2023	Category of Undertaking, likely effects	29
Program Comment Conference Call 4 https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/12/Consultation-Conference-4-Program-Comment-Pre-1919-Army-Housing.pdf	12/6/2023	Approach, methodology	27
Program Comment Conference Call 5 https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/12/Consultation-Conference-5-Program-Comment-Pre-1919-Army-Housing.pdf	12/13/2023	Historic housing costs, implementation, applicability, effect and duration	31
Program Comment Conference Call 6 https://www.denix.osd.mil/army-pre1919-pchh/denix-files/sites/97/2023/12/Consultation-Conference-6-Program-Comment-Pre-1919-Army-Housing.pdf	12/20/2023	Summary and Conclusion	25

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Federal Register Notice Comments

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	STAKEHOLDER COMMENT	ARMY RESPONSE
1	Michael Ravnitzky	N/A	10/23/2023	Public	I am writing to express my support for the Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. I think this plan is a reasonable and practical one, considering the challenges and opportunities that the Army faces in preserving and managing its pre-1919 historic housing and associated features. I believe that this plan will help the Army to balance its preservation and operational goals, while also ensuring consultation and coordination with relevant stakeholders and the public. I commend the Army for recognizing the historical and cultural value of its pre-1919 historic housing and associated features, and for taking steps to protect and maintain them. These properties represent the Army's earliest efforts to provide adequate housing for its personnel and their families, as well as to create a sense of community and identity among them. They also reflect the Army's role and mission in shaping the history and development of our nation. By preserving these properties, the Army not only honors its past, but also inspires its present and future generations. At the same time, the Army must be cognizant of costs associated with such preservation. I also appreciate the Army's efforts to follow to the greatest degree possible the established best practices and guidelines for historic preservation, such as the Section 106 of the National Historic Preservation Act (NHPA), the Secretary of the Interior's Standards for the Treatment of Historic Properties (SIS), and the Historic Housing Management Plan (HHMP). I think that these procedures and standards will ensure that the Army's actions are consistent with the historic character and integrity of its pre-1919 historic housing and associated features, and that they are documented and reported accurately and transparently. However, I also have some suggestions for improving the plan document during this public comment phase. I hope that these suggestions will help the Army to enhance the quality and clarity of the document, as well as to address some potential concerns or questions that the public or other stakeholders might have about the plan.	Acknowledged
2	Michael Ravnitzky	N/A	10/23/2023	Public	Provide more data or evidence to support the claims - I respectfully suggest that the Army provide more quantitative data or evidence to support its claims that the current Section 106 compliance process is inefficient and ineffective, and that the proposed Program Comment would result in significant improvements. For example, how much time and money does the Army spend on average for each Section 106 review of its pre-1919 historic housing and associated features? How much time and money would the Army save by using the Program Comment instead? How many pre-1919 historic housing and associated features are affected by the current Section 106 compliance process? How many of them would be covered by the Program Comment? Providing such data or evidence would help in understanding the rationale and benefits of the proposed action, as well as to evaluate its feasibility and impact.	Number of properties affected by this action are in the Program Comment Plan and will also be included in the proposed program comment. Additional information on costs, time, and associated information is provided in the "Supplemental Information" briefing at https://www.denix.osd.mil/army-pre1919-pch/ , and this Supplemental Information briefing was briefed to all interested parties at the stakeholder consultation meeting on 13 Dec 2023.
3	Michael Ravnitzky	N/A	10/23/2023	Public	Address any potential conflicts or disagreements that may arise - I respectfully suggest that the Army explain how it would address any potential conflicts or disagreements that may arise between it and other parties regarding the management or treatment of its pre-1919 historic housing and associated features. For example, how would the Army resolve any disputes or complaints that may occur with the State Historic Preservation Officer (SHPO), the Tribal Historic Preservation Officer (THPO), the Advisory Council on Historic Preservation (ACHP), or other interested parties over its actions under the Program Comment? How would the Army handle any appeals or challenges that may be filed against its decisions or determinations under the Program Comment? How would the Army ensure that its actions under the Program Comment are transparent and accountable? Addressing such issues would help establish trust that the Army would act in good faith and in accordance with the law when using the Program Comment.	Implementation issues would be addressed in the annual report and annual meeting. Also we now have proposed to have technical assistance and on-site monitoring by qualified preservation professionals to reduce the possibility of implementation issues. Once adopted by the ACHP, the ACHP is also responsible for addressing any issues.
4	Michael Ravnitzky	N/A	10/23/2023	Public	Provide more examples or illustrations of how the Program Comment would work in practice - I respectfully suggest that the Army provide some examples or illustrations of how it would identify, document, treat, or report its pre-1919 historic housing and associated features under different scenarios or situations. For example, how would it determine whether a property is eligible for listing in the National Register of Historic Places (NRHP) or not? How would it develop and implement a HHMP for each installation or facility that has pre-1919 historic housing and associated features? How would it apply the SIS when carrying out actions that may affect these properties? How would it consult and coordinate with relevant stakeholders on these actions? How would it document and report these actions to these stakeholders? Providing such examples or illustrations would help in understanding how the plan/process would affect or benefit these properties in reality.	Examples of how the approach would operate are in the annual reports for the Program Comment for Army Inter-War era housing submitted to the ACHP since 2020. Army is already successfully implementing a proven similar approach for its housing from 1919-1940, and is simply expanding the approach to pre-1919 housing.
5	Michael Ravnitzky	N/A	10/23/2023	Public	In conclusion, I reiterate my support for the Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. I think this plan is a reasonable and practical one, and that it will help the Army to balance its preservation and operational goals, while also ensuring consultation and coordination with relevant stakeholders and the public. I also think that this plan is important for preserving our nation's history and honoring the Army's past, present, and future generations. I hope that the Army will consider my suggestions for improving the plan document during this public comment phase.	Thank you for your support of the Program Comment
6	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	Thank you for the opportunity to comment on this request from the Department of the Army (Army) for consultation on the Program Comment Plan for Preservation of pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. The program comment plan was posted in the Federal Register on Monday, October 23, 2023 (vol. 88, no. 203, pg. 72743). The Hawaii State Historic Preservation Division (SHPD) has reviewed your submittal and do not agree that program comment is an appropriate method for preserving pre-1919 historic army housing. We have attached detailed comments on the proposed Program Comment Plan to this letter. If you have any questions about letter or attached comments, please contact Jessica Puff, Architecture Branch Chief, at (808) 692-8015 or by email at jessica.puff@hawaii.gov	Acknowledged
7	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	The proposed Army Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features does not sufficiently establish a program alternative to the four-step process outline at 36 CFR Part 800 or 54 U.S. Code Part 306108. Rather, it undermines existing agreement documents, such as the Programmatic Agreement among the United States Army, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Privatization of Family Housing at US Army Garrison, Hawaii. And, it suggests that undertakings which fall under the proposed Program Comment Plan will ensure "positive historic preservation outcomes that will preserve the historic character of and the continuity of historical use of pre-1919 housing" (pg. 10, Army Program Comment Plan) without providing sufficient evidence to this effect. Additionally, it does not identify a path for considering the historic significance and requirement for resolving adverse effects. Based upon these factors and the information provide within the proposed plan, the Hawaii State Historic Preservation Officer cannot concur with the adoption of the Army Program Comment Plan	The Army is applying concepts from the prior ACHP approved approach to Army Inter-War era housing (1919-1940) in this Program Comment. Evidence of the successes of this process are in the Annual Reports at https://www.denix.osd.mil/army-pch/ as indicated during stakeholder consultations. Please review 36 CFR 800.14(e), program comments are programmatic and operated "in lieu of conducting individual reviews".
8	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	The Army identifies, within the proposed Army Program Comment Plan, that at least 74% of the 865 properties included under the plan are within National Historic Landmark districts. However, the proposed Army Program Comment Plan does not sufficiently take into consideration the unique and significant treatment measures that are necessary to be implemented in order for Army to meet their responsibilities under 36 CFR Part 800.10. Nor does it recognize the unique and significant character defining features of each designated National Historic Landmark/District (NHL). Instead, the proposed Program Comment Plan minimizes the Army's responsibilities to only a level of "minimizing harm" when "feasible" (pgs. 16-17, Army Program Comment Plan) rather than, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that maybe directly and adversely affected by an undertaking." It allows the Army to treat all National Historic Landmarks that include pre-1919 historic Army housing the same, rather than consulting with SHPOs and local consulting parties to determine best treatment measures. Thus, the exemplar scopes of work included within the proposed Army Program Comment Plan are not categorically in keeping with Secretary of the Interior Standards for the Treatment of Historic Properties.	The Program Comment Plan recognizes the significance of NHLs, does not minimize responsibilities, and follows the SOI Standards. It will improve the conditions of NHL housing. Please review 36 CFR 800.14(e), program comments are programmatic and operated "in lieu of conducting individual reviews".
9	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	The Army's justification for this programmatic approach appears to be supported by claims that treatment measures allowed under the proposed Army Program Comment Plan are more economically and environmentally responsible. However, the Army has provided no supporting evidence for their claims and cost estimates. While the Army's assertions are concerning, upon further review they appear implausible and lack sufficient validity. For example, the Army's financial projections appear to suggest that if the Army were not to implement their proposed programmatic approach they would spend approximately \$90,000/year for the next twenty-two years (almost \$2 million dollars/residential unit over the next twenty-two years) for routine maintenance and repair at each of the 865 residential units that would be covered by the proposed plan (pg. 4-5, Army Program Comment Plan). These estimates appear to be inflated to support the hypothetical need for the Army's proposed Program Comment Plan.	As referenced in the Program Comment Plan and during stakeholder consultations, such supporting information is provided in the Annual Reports for the Army Inter-War Era Program Comment at https://www.denix.osd.mil/army-pch/ , in the Supplemental Information briefing at https://www.denix.osd.mil/army-pre1919-pch/ , and was provided during stakeholder consultations. The management and operation of the vast majority of these homes was privatized at Army installations over 15 years ago, and preservation activities for each installation since that time have occurred following the NHPA Section 306108 Programmatic Agreements (PA) executed by each installation with their respective State Historic Preservation Office (SHPO) at the time of housing privatization. The PROGRAMMATIC AGREEMENT FOR THE PRIVATIZATION OF FAMILY HOUSING AT US ARMY GARRISON, HAWAII executed in 2004 is an example. The installation specific housing PAs require application of the Secretary Standards at 36 CFR 68 for the repair and improvement of historic housing. The manner in which each SHPO and installation has implemented their PA and the Secretary's Standards varies at each installation but in general has required the use of high cost historic materials. Please become familiar with Program Comments purpose and use at 36 CFR 800.14(e) and with the ACHP's guidance and questions and answers regarding program comments. Program Comments are not an exemption. The Army installations with pre-1919 housing have been working under programmatic agreements with individual SHPO offices for over 15 years and per the findings of the Army Inspector General, those agreements and the manner in which they are implemented are a significant issues that has contributed to the current substandard housing conditions. Substitute materials are allowed under the SOI Standards and Guidelines for Rehabilitation - which are being applied in this proposed Program Comment. Their use is not "inappropriate" and is guided by a building materials selection process that considers repair of historic materials where possible, and if not possible considers the use of in-kind and imitative substitute materials, a process supported by the guidelines in the appendices of the Program Comment Plan.
10	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	Based upon the factors above, and consultation meetings held thus far, it appears that this program comment plan is being executed by the Army to create a categorical exemption from complying with Section 106 of the National Historic Preservation Act. Much like existing Program Comments, this proposed program comment plan will lead to the standard application of inappropriate preservation treatment measures, including removal of historic character defining features and application of inappropriate substitute materials, that will adversely affect the integrity of some of this nation's most significant historic resources. Such a plan should not be implemented at a national level. Instead, if there truly is a need for a programmatic approach, Army should work with the SHPOs, THPOs, and NHLs within the 14 states directly impacted by the Army Program Comment Plan.	Please become familiar with Program Comments purpose and use at 36 CFR 800.14(e) and with the ACHP's guidance and questions and answers regarding program comments. Program Comments are not an exemption. The Army installations with pre-1919 housing have been working under programmatic agreements with individual SHPO offices for over 15 years and per the findings of the Army Inspector General, those agreements and the manner in which they are implemented are a significant issues that has contributed to the current substandard housing conditions. Substitute materials are allowed under the SOI Standards and Guidelines for Rehabilitation - which are being applied in this proposed Program Comment. Their use is not "inappropriate" and is guided by a building materials selection process that considers repair of historic materials where possible, and if not possible considers the use of in-kind and imitative substitute materials, a process supported by the guidelines in the appendices of the Program Comment Plan.
11	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Thank you for the opportunity to provide feedback on the Army's proposed Program Comment for the Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. This letter serves as comment on the proposed alternate procedures from the State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission	Acknowledged

**Administrative Record for Program Comment for Preservation of Pre-1919 Historic Army Housing
Federal Register Notice Comments**

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	STAKEHOLDER COMMENT	ARMY RESPONSE
12	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	The Texas Historical Commission appreciates the challenges that come with retaining and rehabilitating historic housing for modern use, and we are particularly concerned by the Congressional mandate to demolish certain pre-1919 Army housing in response to the cost of rehabilitation. Nevertheless, we find the proposed program comment diverges too far from the Secretary of the Interior's Standards for the Treatment of Historic Properties, particularly given that nearly 75% of the affected housing stock is designated as National Historic Landmarks (NHLs), either individually or as contributing to NHL districts. Safeguards within the program comment are not adequate to provide the higher standard of care federal agencies must exercise when considering activities that can adversely affect NHLs, pursuant to Section 110(f) of the National Historic Preservation Act. We respectfully disagree with the proposal to fully eliminate project-specific reviews by SHPOs and the National Park Service under these circumstances. Instead, we recommend amendment of existing programmatic agreements for Army housing to include additional streamlining measures, such as installation-specific design standards with preapproved substitute materials and systems. We have the following specific comments on the "Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Feature"	Please become familiar with Program Comments purpose and use at 36 CFR 800.14(e) and with the ACHP's guidance and questions and answers regarding program comments. Existing agreements have contributed the current poor conditions of this housing inventory - see the Army Inspector Generals report and Army response in item 13 above. Amending existing agreements for the 19 installations with pre-1919 housing is inefficient, will result in 19 different agreements to follow, that will continue to exasperate the current issues that are related to those agreements.
13	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 6, Category of Undertaking and Likely Effects on Historic Properties. We greatly appreciate the program comment's exclusion of actions that would have an adverse effect on historic housing, namely demolition, cessation of maintenance, and new construction. However, we disagree that the management activities allowed under these alternate procedures will not have an adverse effect. While repair and ongoing use does "promote the long-term preservation of NHL and other pre-1919 Army housing," modifications that do not meet the Standards will occur under the program comment. Section 106 regulations at 36 CFR 800.5 (a)(2)(ii) include as an example of an adverse effect: "Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines". As such, provisions for mitigation should be included if the program comment is not modified to require compliance with the Standards.	TX SHPO provides no specific information, examples, or citation regarding its assertion that the Program Comment is not consistent with the SOI Standards. The proposed Program Comment comports with the SOI Standards for Rehabilitation. Army will expand on section 6 to make that more clear.
14	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 7, Approach and Methodology. While true to an extent, we disagree with the blanket statement that "imitative substitute building materials that have been used for roofing, windows, and other applications are reversible and can be replaced with in-kind building materials at any point in the future." Removal and replacement of original building materials can result in a loss of historic integrity, and when imitative substitute materials are used, there may be a tendency to pursue more widespread replacement to provide a consistent appearance. In a practical sense, these materials will not be replaced again with in-kind materials during their lifespan.	Substitute materials are reversible. Also, they would not be used without going through the materials selection procedure that first evaluates historic building materials conditions for possible repair, prior to proceeding to the process of evaluating and selecting either in-kind or substitute materials. The substitute materials are reversible and can be replaced within-kind materials at any time.
15	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Conversely, we also disagree that the Standards for Rehabilitation "never recommend removal and replacement of deteriorated historic building materials with modern imitative substitute materials". While it is correct that selective, in-kind repair is preferable to address limited deterioration, substitute materials can be appropriate when full-scale replacement is necessary, and it is possible to match the design and visual characteristics of the material to be replaced. As an example, at Fort Sam Houston, our office has concurred with replacement of historic tongue-and-groove wood porch flooring using a paintable extruded PVC product that matches the dimensions and installation methods of the original flooring	This quote is taken out of context. The full statement from the Program Comment Plan is "the Secretary's Guidelines for Rehabilitating Historic Buildings never recommend removal and replacement of deteriorated historic building materials with modern imitative substitute materials when the historic materials building can be reasonably repaired or replaced in-kind, even when imitative substitute materials are more cost efficient and financially feasible, more climate resilient, have an equivalent lifecycle, and improve the quality of life, health, and safety of occupants of the housing." This proposed program comment simply provides for the use of materials as you have previously agreed to per your example from Fort Sam Houston.
16	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 8.2, Selection Procedure. Our office understands the importance of evaluation of historic materials to determine the proper course of treatment following the Standards. We would suggest that the program comment require installations to keep an inventory of pre-1919 housing units containing lead and asbestos that have been abated, to allow the acquisition and stockpiling of building materials to save on material costs.	Will include of stockpiling historic building materials for reuse in the proposed program comment.
17	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 9, Historic Preservation Tax Credits. The Texas Historical Commission fully supports participation by Residential Communities Initiative (RCI) privatized housing partners in federal and state historic preservation tax credits. However, the program comment itself does not support this goal. Use of incompatible substitute materials, widespread replacement of building materials based on considerations other than that existing historic materials are deteriorated beyond repair, and other work that does not meet the Standards will compromise housing partners' ability to obtain these incentives. Further, historic tax credits require individual project-by-project consultation with SHPOs and the National Park Service	This program comment implements the Secretary's Standards for Rehabilitation by means of a standardized approach and methodology with specific criteria, procedures, detailed design guidelines and building materials guidelines for the selection of appropriated historic, in-kind, or imitative substitute building materials. This program comment also implements the ACHP's Policy Statement on Climate Change and Historic Preservation by explicitly incorporating climate resiliency considerations in the building materials selection process. TX SHPO provides no specific information, examples, or citation regarding its assertion that the Program Comment is not consistent with the SOI Standards. The proposed Program Comment
18	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 10, Annual Report and Annual Meeting. We request that the annual report also be provided to the National Park Service and the National Conference of State Historic Preservation Officers, or to the individual SHPO offices for states with pre-1919 Army housing	The Annual Reports will be posted on the Program Comment website so all interested parties and the public have access. For example, see the Annual Reports for Program Comment for Inter-War era housing posted at https://www.denix.osd.mil/army-pchh/
19	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 11, Applicability and Implementation. This section should reference the Secretary of the Interior's Professional Qualifications Standards. Staff meeting the qualifications for historic architecture or architectural history should oversee application of the Selection Procedure established in Section 8.2 and interpretation of the guidance in Appendices A and B. Directives such as using imitative substitute materials only "where such materials are appropriate" or maintaining character-defining features "to the maximum extent possible" require adequate professional training in historic preservation to make the appropriate decisions. RCI privatized housing partners who would implement this program comment in Texas lack qualified staff to make these determinations.	Many RCI partners have accessed and used SOI qualified staff. Army RCI partners have also been implementing the Secretary's standards and Guidelines under installation level PAs for over 15 years and are well acquainted with requirements. Army will also add a section to the proposed Program Comment providing on-site technical assistance and monitoring by qualified professionals.
20	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	While it is preferable to avoid adverse effects, the actions under this program comment will result in adverse effects to historic properties, and additional mitigation should be developed. Forms of mitigation for consideration include the following ideas. Recordation can vary between installations on properties; we recommend updating building surveys with detailed conditions assessments with photographs of every exterior elevation and Historic American Building Survey Level I recordation of all buildings within the pre-1919 housing era at each installation. Monies that would have been used for rehabilitation projects could be used to hire contractors to draw updated floorplans of pre-1919 buildings, structures, and landscapes. Installations could partner with local historic preservation groups and SHPO offices to invite contractors, local tradespeople, and students for materials conservation training schools. The schools could focus on learning how to conserve a material while working on pre-1919 properties, saving the installation time and monies. Another way to save monies could be creating templates for scopes of work with drawings of a specific type of feature and material. Populating information will be quick and save time for professionals at the installations. An interpretive publication could use existing documentation from the Army website and various primary and secondary academic sources.	The management actions as implemented under this proposed program comment are not adverse. Pre-1919 Army housing has already been extensively documented to include all available original Quartermaster Corps plans for the housing, historic contexts have been prepared, and extensive documentation following HABS standards of the pre-1919 homes has already been completed, this extensive documentation is now consolidated and publicly available on the program comment website https://www.denix.osd.mil/army-pre1919-pchh/ . The recommendation of the Texas SHPO to divert monies from for rehabilitation projects to hire contractors to draw updated floorplans of pre-1919 buildings will exasperate the existing issue of backlog of required repairs and improvements and contribute to the very issues that are driving the need for this program comment.
21	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Appendix A, Design Guidelines. We appreciate the requirement to evaluate whether elements are deteriorated beyond repair before proposing replacement. However, in many of the individual guidelines, the priority of considering replacement in-kind before turning to imitative substitute materials is not clearly conveyed. The guidelines also do not always fully cover the range of available alternatives that would allow retention of historic materials. For instance, under the Guidelines for Interiors (p. 34), encapsulation of paint is the only alternative mentioned before removal of the underlying feature in its entirety; the lead-based paint could be abated. The discussion of plaster lacks any mention of decorative plaster, such as moulding or medallions, which should be retained even if adjacent flat plaster is replaced with gypsum board. Only historic interior doors, and not other elements that may be removed and replaced, are recommended to be salvaged for possible reuse.	Will add in language in the Design Guidelines pertaining to abatement of lead based paint on windows through process such as dip-stripping. The guidelines in appendix A of the program comment plan for interiors already states: b. "Retain interior features that are important in defining the overall historic character of the building to the extent possible or replace in-kind historical building materials or with imitative substitute building materials. Interior character-defining features are columns, cornices, baseboards, crown molding, fireplaces and mantels, stairs, and ceiling height." The discussion of plaster already directly addresses decorative plaster: "c. Retain wallpaper, plaster, and finishes such as stenciling, marbling, and graining; and other decorative materials to the extent possible." Will add additional recommendations for salvage of materials to the program comment. The process for considering use of in-kind vs imitative substitute building materials in provided in the building materials selection procedure in section 8 of the program comment plan and will be carried forward into the proposed program comment.
22	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Preservation Brief 16: The Use of Substitute Materials on Historic Building Exteriors provides criteria for the evaluation of substitute materials at historic properties and should more clearly inform the program comment's approach. Substitute materials that are only "similar" in their size, configuration, and other physical characteristics will not meet the Standards for Rehabilitation and will erode the integrity of the housing stock.	The Army will review and incorporate further considerations from the guidance in NPS Bulletin 16 as appropriate. Under this proposed program comment, deteriorated historic features will be repaired rather than replaced and where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. This SOI Standard for Rehabilitation will be applied taking into consideration the economic and technical feasibility of each project, also required by the SOI Standards at 36 CFR 68.3, to make a final determination of the appropriate and best choice building materials.
23	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Appendix B, Building Materials Catalog. As with the Design Guidelines, the priority of considering replacement in-kind before turning to imitative substitute materials is not clearly conveyed	The building materials selection criteria and procedures in section 8 provides the process for selecting either in-kind or imitative substitute materials if repair of historic materials is not possible. Appendices A and B are aids to that process.
24	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Throughout, there is a stated preference for artificial woodgrain in substitute materials to replace wood. Generally, with these types of substitute materials, a smooth finish is preferable to emulate the texture of sanded and painted wood elements, rather than that of weathered or deteriorated wood. While we concur that matching original colors based on paint analysis is not necessary, the record of those original colors may be lost with complete replacement of historic materials.	Historic paint colors have been researched and analyzed in-depth, there is extensive research in this area by academics and others. Consideration of texture occurs throughout appendix A.
25	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	The catalog includes multiple examples of imitative substitute materials that are widely regarded as incompatible in historic preservation applications, such as vinyl or aluminum siding and vinyl windows. It includes many others that may be compatible in certain circumstances but would require careful evaluation. For windows, an applied muntin grid on the outside can achieve a good match for the historic appearance, but muntins between the two panes of glass is not a convincing suggestion of a historic window's appearance. We support the development of standardized replacements tailored to buildings of the same design, provided that the replacement windows are a good match for the historic windows. For instance, Joint Base San Antonio regularly uses an aluminum window that meets antiterrorism/force protection requirements and provides a good match for the overall design, configuration, dimensions, and profiles of the historic wood windows at Fort Sam Houston.	The statement "widely regarded" is highly subjective and lacks any citation to statutory or regulatory requirements. In fact the materials cited have approved by the ACHP and used in the Program Comment for Army Inter-War Era housing (1919-1940). Examples of this usage were provided to stakeholders during the consultation process and are posted on the program comment website. The building materials selection criteria and procedure in section 8 of the program comment plan along with the Design Guidelines and Building Materials Guidelines and Catalog will ensure a good match for the overall design, configuration, dimensions, and profiles of historic windows where their replacement is necessary. Program Comment will expand on discussion of vinyl windows with reference to NPS Preservation Brief 16.
26	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Again, thank you for the opportunity to comment during the development of this significant policy change. If you have any questions concerning our remarks, please contact Elizabeth Brummett at 512-463-6218.	Acknowledged

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27	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	The American Cultural Resources Association (ACRA), the trade association for firms that specialize in cultural resource management (CRM), appreciates this opportunity to comment on the Department of the Army's Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. ACRA member firms undertake much of the legally mandated CRM studies and investigations in the United States and employ thousands of CRM professionals, including anthropologists, archaeologists, architectural historians, historians, and an increasingly diverse group of other specialists. To help guide smart, sustainable economic development and safeguard important historic and cultural heritage assets, ACRA members apply specialized research skills w Section 106 of the National Historic Preservation Act (NHPA) is the cornerstone federal policy that balances the need to build our nation's infrastructure with the need to preserve our past. CRM professionals and their clients respect the Section 106 process because it provides a clear, consistent roadmap to enable projects to move forward while considering their impact on the country's diverse cultural heritage. Communities value the process because Section 106 gives citizens a voice in preservation.ithin a framework of federal, state, local, and/or Indian Tribal laws and regulations, facilitating an open dialog where every stakeholder has a voice. Section 106 of the National Historic Preservation Act (NHPA) is the cornerstone federal policy that balances the need to build our nation's infrastructure with the need to preserve our past. CRM professionals and their clients respect the Section 106 process because it provides a clear, consistent roadmap to enable projects to move forward while considering their impact on the country's diverse cultural heritage. Communities value the process because Section 106 gives citizens a voice in preservation.	Acknowledged
28	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	Program comments are a useful tool to enable federal agencies to consider a group of similar undertakings to be addressed under the Section 106 process, instead of addressing each undertaking individually. Programmatic comments consider repetitive management actions that would not lead, inadvertently or otherwise, to the destruction of buildings and other assets of historical or cultural significance.	Acknowledged
29	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	ACRA is encouraged by the fact that the Program Comment Plan for Pre-1919 structures and features excludes adverse effect actions, such as demolition, cessation of maintenance and new construction. This is, as the Army notes, a departure from other Army program comments. ACRA believes that, in situations where the Army determines that demolition and new construction are warranted, the letter and spirit of the NHPA demand that such undertakings undergo consultation.	Acknowledged
30	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	Likewise, ACRA is pleased that the Program Comment Plan does not rely on the term "Properties of Particular Importance" (PPI), which was used in its Proposed Program Comment for Army Vietnam War Era (1963-1975) Historic Housing, Associated Buildings and Structures, and Landscape Features. PPI lacks legal meaning in federal preservation law and regulations.	The term PPI is a term defined and used for the specific purposes of those program comments, and the term in fact was proposed by ACHP staff and was approved for this use by the ACHP.
31	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	Although ACRA recognizes that there are financial benefits of the use of imitative materials, and in some cases the Army needs to replace historic building materials for hazard abatement purposes, it is important that the use of historic materials not be erased from history. ACRA suggests that the Army consider ways to ensure documentation of historic materials when they are replaced, or explore restoring a select group of structures using historic materials while using imitative materials on the remaining buildings. Such replacements should be investigated using the Secretary of the Interior's Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction.	The Army will ensure the Program Comment Comment is fully consistent with the SOI Stnadards for Rehabilitation including retention and preservation of character defining building elements.
32	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	ACRA appreciates having this opportunity to comment on the Army's Program Comment Plan.	Acknowledged
33	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Historic Hawaii Foundation (HHF) received notice of the Army's Notice of Availability (NOA) for the Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features (Army Program Comment Plan) published in the Federal Register on October 23, 2023, at 88 FR 72743. The NOA initiates a 30-day public review and comment period for the Army Program Comment Plan. HHF accepts the invitation to participate in the consultation for the development of this Program Comment.	Acknowledged
34	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Historic Hawaii Foundation is a statewide nonprofit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawaii. HHF is a consulting party to the Army and other federal agencies pursuant to the implementing regulations of the NHPA at 36 Part 800.2(c)(5) as an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties	Acknowledged
35	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	HHF was a consulting party in the Army's prior Program Comment consultations for Inter-War Era Historic Housing and Vietnam War Era Historic Housing and is a concurring party to the Programmatic Agreement Among the United States Army, the Hawaii State Historic Preservation Officer and the Advisory Council on Historic Preservation for the Privatization of Family Housing at US Army Garrison Hawaii (2004). HHF is also registered with the U.S. Department of Interior as a Native Hawaiian Organization (NHO), as an organization that serves and represents the interests of Native Hawaiians, has a stated purpose as the provision of historic preservation services to Native Hawaiians, and has knowledge about and commitment to preservation of historic properties to which Native Hawaiians attach religious and cultural significance.	Acknowledged
36	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Description of Undertaking- The proposed Program Comment will affect 17 historic housing units contained within Army Garrison Hawaii. Fourteen (14) of those units are contained within the Palm Circle National Historic Landmark at Fort Shafter and three (3) units are located on General's Loop in the Schofield Barracks Canby Neighborhood. As stated in the Proposed Program Comment: "NHPA Section 306108 requires Federal agencies to take into account the effects of projects they carry out, license, or assist (undertakings) on historic properties, and to provide the ACHP a reasonable opportunity to comment regarding such undertakings. The ACHP has issued the regulations codified under 36 CFR 800 that set forth the process through which Federal agencies comply with the procedural responsibilities of NHPA Section 306108." "Under 36 CFR 800.14(e), federal agencies can request the ACHP provide program comments on a category of undertakings, in lieu of conducting individual reviews of those undertakings under 36 CFR 800.3 - 800.7. An agency can meet its NHPA Section 106 responsibilities regarding the effects of a category of undertakings on historic properties by following the steps set forth by the ACHP in a program comment" (Program Comment Introduction, p. 5). "This proposed program comment provides the Army with an alternative means to comply with NHPA Section 306108 regarding the category of undertakings termed management actions for its inventory of pre-1919 housing, associated buildings and structures, and landscape features (pre-1919 housing)... Management actions for this housing are defined for the purposes of this program comment as: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, lease, transfer, and conveyance" (p. 5). "The proposed program comment applies to all of the Army's pre-1919 housing, associated buildings and structures, and landscape features, both privatized and Army-owned. The Army's best available information indicates there are 865 pre-1919 homes located on 18 installations in 14 states. Among these, there are 638 homes (74%) on 10 installations where pre-1919 housing has been designated as individual or contributing properties to NHL Districts" (Program Comment Section 4.0 Scope, p. 12). "The goal of the Program Comment is to provide the Army with National Historic Preservation Act (NHPA) 54 U.S.C. 306108 compliance for the repetitive management actions occurring on this large inventory of similar property types by means of the procedures in 36 CFR 800.14(e), in lieu of conducting individual projects reviews under 36 CFR 800.3 through 800.7."	Acknowledged

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37	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Protection of National Historic Landmarks - Historic Hawaii Foundation objects to the inclusion of contributing resources located in National Historic Landmark district in the Nationwide Program Comment. These properties have previously been identified through rigorous review to designate them as the Nation's most significant historic properties. The National Historic Preservation Act (NHPA) and associated preservation regulations and guidelines recognize that NHL properties must be afforded a higher level of protection. 36 CFR §800.10 Special requirements for protecting National Historic Landmarks. (a) Statutory requirement. Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking. Furthermore, each NHL has documented significance, characteristics and features unique to its location, place in history and status. The NHL program identifies historic and archaeological sites, buildings, and objects which "possess exceptional value as commemorating or illustrating the history of the United States" (NHPA Section 110 Guidelines). To co-mingle these exceptional properties into a pool of unrelated homes nationwide for the purpose of an expedited maintenance program is inappropriate, diminishes the importance of the NHL program, threatens the protection of our Nation's most significant properties and is contrary to stated National Policy for the protection of historic properties. In illustration of this point, the Army itself, in prior Program Comments for Army housing, specifically excluded NHL housing. Inter War Era Program Comment – Section 2.2.5 Applicability and Exclusions - "This Program Comment applies to all Army Inter-War Era housing, with the exception of Army Inter-War Era housing formally designated by the Department of the Interior, National Park Service (NPS) as an NHL or as a contributing property within an NHL. Section 110(f) of the NHPA requires that Federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs and, to the maximum extent possible, undertake such planning and actions as may be necessary, to minimize harm to NHLs. To exercise a higher standard of care for these NHLs, all Army Inter-War Era housing formally designated as an NHL, or housing formally designated as a NHL contributing property within a designated NHL District are not covered by this Program Comment (emphasis added).	The program comment plan for pre-1919 housing complies with all requirements for NHLs. Prior program comments for Army housing all include demolition, which is the reason NHLs were excluded from those other program comments. Operation of the homes under the current installation-level agreement regime has lead to deterioration and inability to fully implement improvements to the housing. The program comment will detail how it will provide a higher standard of care.
38	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Vietnam Era Housing Program Comment – Section 6.0 Applicability "The Army reviewed its National Historic Landmarks (NHL) documentation to confirm there are no Army Vietnam War Era housing designated as individual NHLs or as contributing properties to any NHL district. There are no known Army Vietnam War Era historic housing, associated buildings and structures, and landscape features that are NHLs, or that qualify for NHL designation."	Acknowledged
39	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Palm Circle National Historic Landmark - Fort Shafter, Island of Oahu, Hawaii. In 2004, U.S. Army Garrison Hawaii adopted Guidance for the Palm Circle National Historic Landmark, stating that:"Due to the monumental historic significance of the National Historic Landmark of Palm Circle at Fort Shafter, Hawaii, it is necessary to provide more detailed specifications for the future maintenance and planning for the structures and other contributing elements within its boundaries. "Palm Circle is one of the few, if not the only, Edwardian villages to be constructed in a U.S. Territory. It is also one of the few remaining entities of its kind and has retained much of its historic fabric. "These traits, compounded with its significance to the fields of US history, military history, and architectural history, require that special considerations be given for the future plans of this national treasure. "The elements of Palm Circle, which include, but are not limited to, the arrangement of the structures, the open spaces, the landscape design, the plant taxon, the fountain, the form, materials and construction of each structure are all contributors to the weight and consequence of this historic site. "The preservation of the Palm Circle National Historic Landmark is crucial.... It is imperative that every effort be made to maintain this district for the legacy of the US Army in the Pacific and for the testimony it will serve for future generations." (emphasis added) See Programmatic Agreement, Military Housing Privatization Initiative Appendix E – U.S. Army Garrison, Hawaii, signed by Garrison Commander Colonel David L. Anderson, 30 March 2004.	The program comment ensures that this district will be preserved for the legacy of the US Army in the Pacific and for the testimony it will serve for future generations
40	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Historic Hawaii Foundation concurred with the Army's official statement above and emphatically disagrees that the proposed program comment provides the recognition and protection for Palm Circle NHL that this statement requires. HHF recommends that the Palm Circle NHL be exempted from the Nationwide Program Comment.	Palm Circle is no greater significant than the other NHLs included in this program comment.
41	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Applicability - Currently, management actions for the 17 units of pre-1919 Army housing in Hawaii are subject to the Programmatic Agreement for the Privatization of Family Housing at US Army Garrison Hawaii (2004). During consultation on the Nationwide Program Comment, Army stated that there is no intention to amend or terminate existing Section 106 Agreement documents that apply to the subject properties, but that the Program Comment will "supersede" existing documents. HHF believes this framework will introduce confusion, competing processes and standards, and have the unintended consequence of making compliance actions more complicated, rather than the stated intention to streamline actions.	The same approach has been applied by our other program comments for housing without confusion or unintended consequences.
42	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	The Palm Circle NHL District includes 15 Officers' Quarters, all of which are contributing buildings with similar designs, materials and occupants (all flag-level officers, including the Commanding General for U.S. Army Pacific). Of these, 14 units were constructed 1907-1909 and would be subject to the Program Comment for Pre-1919 Housing, while one was constructed in 1924 and would be presumably be subject to the Program Comment for Interwar-Era Housing. However, since the Interwar Era Housing Program Comment explicitly does not apply to NHLs, it also does not apply to Quarters 18. Therefore, the USAG-HI Programmatic Agreement for Military Housing Privatization Initiative would be the controlling agreement for Quarters 18. This means there will be two distinct Section 106 Agreement documents for the same historic district.	Will include Quarters 18 in this program comment to ensure consistency of treatment of the small number of homes in this predominately pre-1919 NHL district.
43	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Similarly, there are 240 units of historic housing located at Schofield Barracks and Wheeler Army Airfield. Of these, three were built in 1918 and would be subject to the Program Comment for Pre-1919 Housing; 227 were constructed between 1919 and 1940 and are subject to Program Comment for Interwar-Era Housing. However, another eight units were constructed in 1949 and two were built in 1957, which are not covered by either Program Comment and would remain subject to the USAG-HI Programmatic Agreement for Military Housing Privatization Initiative. That means there will be three separate Section 106 Agreement documents applicable to the same historic district.	The units constructed in 1949 and 1957 fall under the Program Comment for Army Capehart Wherry housing (1949-1962).
44	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	This is confusing enough for the housing units, but they at least have clear construction dates. It is extremely unclear how decisions for other features would be handled, especially landscapes with spatial relationships, vegetation, circulation patterns, small-scale features and archaeological resources. The first plans for Schofield Barracks were developed in 1912 and 1916. Construction of the housing areas began in 1916, paused during WWI and then resumed in 1918 with most of the housing area completed between 1919 and 1933.	For consistency, landscapes and landscape features are similarly addressed in the Design Guidelines for both Inter-War Era housing and Pre-1919 housing.
45	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	With the period of construction spanning several eras, which National Program Comment applies to landscapes, archeological sites, vegetation and small scale features? The pre-1919, the Interwar Era or neither or both? Given the stated intention to make compliance actions more efficient and consistent, this situation seems to make compliance more complicated and confusing rather than less.	see previous response.
46	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Management Actions - Management actions are defined for the purposes of this program comment as: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, lease, transfer, and conveyance. (p.5). Army states that this program comment, unlike the three other Army program comments for historic housing, does not include adverse effect actions; demolition, cessation of maintenance, and new construction are excluded. HHF appreciates that the management actions are more appropriately confined to maintenance activities and do not include demolition, cessation of maintenance, and new construction. This more closely matches the intent of the program comment as defined in 36 CFR 800.14 as repetitive actions.	Demolition is a repetitive action when addressing an inventory of historic buildings the scale and magnitude of the Army's. Demolition has been approved by ACHP for inclusion in the three prior program comments for Army housing and several other DoD program comments, demonstrating the intent of program comments.

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47	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	However, HHF does not agree that the management actions as defined above do not pose the potential of adverse effects to significant NHL properties. Aside from routine maintenance and repair actions, all other categories of action still have the potential to be adverse. HHF strongly recommends that the existing specific guidance developed for the Palm Circle National Historic Landmark, Schofield Barracks and Wheeler Army Airfield remain the appropriate standards and guiding documents for these historic properties.	Army will clarify and expand the discussion of effect in section 6.
48	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Given these concerns, Historic Hawaii Foundation recommends that the Army's proposed Program Comment for Pre-1919 Housing exclude U.S. Army Garrison – Hawaii. We recommend that the Programmatic Agreement for the Privatization of Family Housing at US Army Garrison Hawaii (2004) remain the superseding agreement for the 17 units in Hawaii.	The Army intends to continue to include Palm Circle in the program comment. Palm Circle is no more significant than the other NHL districts included in this program comment.
49	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The National Trust for Historic Preservation ("National Trust") thanks the Army for this opportunity to comment on the Proposed Comment Plan for the Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features ("Program Comment Plan"). We appreciate that the Program Comment Plan was developed in collaboration with staff from the Advisory Council on Historic Preservation ("ACHP"). We also note that it is less objectionable than previous Army Program Comments due to the exclusion of demolition, cessation of maintenance, and new construction from its scope. We hope the following comments will assist in the further refinement of the Program Comment Plan	Acknowledged
50	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Proposed Program Comment Development Process is unreasonably rushed and does not allow for meaningful consultation. The Program Comment Plan proposes a Development Process that unreasonably limits the ability of the stakeholders and consulting parties to offer substantive comments. The Army first issued a public notice for this undertaking on October 23, 2023, and the Army proposes to submit the final Program Comment to the ACHP by January 31, 2024.1 This proposed timeline allows just over 90 days for the entire Section 106 consultation, with those 90 days including the Thanksgiving, Christmas, and New Years holidays, during which staff capacities are typically diminished. This timeline is insufficient for the Section 106 review of a Program Comment of this scope, especially since the vast majority of the 865 historic resources affected are within National Historic Landmark Districts and are legally entitled to heightened protection per Section 110(f) of the National Historic Preservation Act ("NHPA"), 54 U.S.C. § 306107.	The Program Comment consultation process has been meaningful and appropriate as demonstrated by this Administrative Record. The Army implemented the same number of consultation conferences (six) for the prior program comments approved by the ACHP. It is noted that all stakeholders will have another opportunity to comment when the ACHP implements their consultation process following Army submission of the program comment. Planning and discussions with key historic preservation stakeholders regarding this program comment began six months ago, in June 2023. On 15 June 2023, the Assistant Secretary of the Army for Installations, Energy and Environment held a meeting at Fort McNair, Washington DC with senior leaders in historic preservation to discuss pre-1919 Army housing NHPA compliance issues and program alternatives. Stakeholders present at the 15 June 2023 meeting included the Assistant Secretary of Defense for Energy, Installations, and Environment; Assistant Secretary of Interior for Fish and Wildlife and Parks; Chairman, Advisory Council on Historic Preservation (ACHP); Chairman, National Capital Planning Commission; Associate Director, National Park Service (NPS); Executive Director, ACHP; and the Executive Director, National Conference of State Historic Preservation Officers (NCSHPO). There was general agreement among all stakeholders present that a nationwide programmatic NHPA compliance approach to pre-1919 Army housing is needed. On 20 July 2023, and as a follow-up to the Ft McNair meeting the Army Federal Preservation Officer (FPO) held a consultation meeting with the ACHP Executive Director, NCSHPO Executive Director, and the NPS Associate Director to obtain their views on a programmatic course of action on pre-1919 housing for Army's consideration. On 24 August 2023, the Army FPO again met with the ACHP, NPS, and NCSHPO to further discuss a program alternative for pre-1919 Army housing. Also on 24 August, the Army FPO had a separate follow-on discussion with the ACHP Executive Director. On 19 September 2023, the Army FPO officially notified the ACHP Executive Director of the Army's decision and intent to seek a Program comment for its inventory of pre-1919 housing. Following that notification in Sept., the Army published a Federal Register notice for public comment and implemented six in-depth weekly consultation conferences during Nov and Dec 2023. The Army's consultation period ended prior to the weeks containing Christmas and New Years. No consultation meeting was planned during the week of Thanksgiving.
51	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The insufficiency of the proposed timeline is most notable in December, when four out of the six total consulting parties meetings are scheduled to be held. This proposed weekly pace of meetings, each addressing different, complex topics, does not allow enough time for the consulting parties to develop and submit meaningful written comments in between meetings. More importantly, it fails to allow time for any meaningful agency response to our comments, and creates the impression that the Army is merely going through the motions of consultation, with no intention of making any modifications whatsoever to its preconceived plans	This Administrative Record evidences that meaningful comments have been provided from stakeholders and the Army has considered and taken those comments into account, some leading to changes in the proposed program comment.
52	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	Dialogue with the consulting parties is especially important here, since the Program Comment proposes to replace multiple installation-specific agreement documents, which were developed through consensus with consulting parties. State Historic Preservation Officers ("SHPOs") and others who worked to develop those agreements deserve sufficient time to review and comment on the Army's proposed replacement of those custom-tailored and negotiated agreements with a nationwide one-size-fits-all plan. Affected SHPOs have already voiced concerns about the Program Comment during the comment and consultation process, and we ask that all stakeholders be afforded sufficient time to review and comment on each aspect of the Program Comment.	See above two responses.
53	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The National Trust is concerned that, as currently scheduled, this consultation will essentially consist of the Army presenting voluminous information to the consulting parties in December, then the consulting parties submitting a wave of substantive comments to the Army in January. We fear that timeline will lead to numerous important issues remaining unresolved on January 31, 2024, when the Army plans to submit the final program comment to the ACHP. It would be unfortunate if substantial opposition to this Program Comment were to arise due to inadequate time to reach consensus on issues that should otherwise be resolvable. We encourage the Army to extend the timeline for the Program Comment Development Process to better facilitate participation by consulting parties and stakeholders in this Section 106 consultation and to avoid potentially resolvable opposition.	The information presented has all been posted on the program website for all stakeholders to review since the October Federal Register announcement. Stakeholders also have another entirely separate opportunity to review and comment on the Program Comment directly to the ACHP once formally submitted.
54	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The consultation process fails to include cultural resource professionals from Army installations with pre-1919 housing. The Program Comment Plan establishes a selection procedure for the use of substitute and imitative materials.2 However, the Plan places no limitations at all on who will make the decisions about whether or not to use substitute materials and what to choose as an imitative replacement. In fact, Appendix B to the Plan suggests that the private housing partners themselves will implement the selection procedure, rather than Army staff. (p.40) The National Trust is concerned that these decisions will not be made or executed by individuals with any relevant professional qualifications, leading to poor decision-making and sub-optimal outcomes for both historic resources and the Army. Furthermore, the private housing partners, many of whom already have records of severe negligence with respect to maintenance of the historic properties, will be biased to make decisions based exclusively on the cheapest cost	Program comment requirements are for public participation as per 36 CFR 800.14(e)(2). Program Comments are also developed by agencies at their headquarters level - see ACHP Program Comments Q and A. The Army will add a section to the program comment providing for qualified professional assistance in materials selection and monitoring. Army housing partners have been required to implement installation level PAs and SOI Standards for over 15 years and have SOI qualified individual's on staff and have had other SOI qualified individuals under contract. As shown by their implementation of the Program Comment for Inter-War era housing, Army's privatized housing partners use both in-kind and substitute materials when historic materials require replacement -see the Annual Reports at https://www.denix.osd.mil/army-pch/ . The Army will also add in a section to the proposed program comment providing Army housing partners with SOI qualified technical assistance in implementation of the program comment.
55	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The selection procedure put forth in the Program Comment Plan could easily be improved by leveraging existing federal resources. Federal funding already pays for an expert historic preservation architect in each SHPO office, as well as Army cultural resource management staff at most of the affected installations, many of whom have historic preservation qualifications. Giving them a decisive role in the selection procedure outlined in the Program Comment Plan would likely result in better outcomes for both historic resources and for the Army. Their localized expertise and institutional knowledge are needed to ensure the effectiveness of this Program Comment.	The Army will add a section to the program comment providing for qualified professional assistance and monitoring. Additionally, one related benefit of the program comment is to reduce the workload on Army CRMs who are already understaffed and overwhelmed with ever increasing workloads. Importantly, the program comment will also reduce the workload of SHPOs, who according to NCSHPO are similarly understaffed and overwhelmed with workload.

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56	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	For example, as illustrated in the Program Comment Plan, the historic homes included in the Army's pre-1919 inventory include a wide variety of architectural styles, and they are located in dramatically different geographic locations and climates, in 14 different states, ranging from Hawaii to Arizona to Upstate New York. ³ Those climate differences may have a significant impact on which replacement materials may be effective and appropriate, and the determinations need to be made locally, rather than on a nationwide basis. They also need to be made by historic preservation professionals, rather than by corporate housing managers whose primary motivation is maximizing profit. This level of consideration is required given that the majority of resources affected by the Program Comment are National Historic Landmarks and subject to the protections of Section 110(f) of the NHPA.	Regional variations are the rule with historic housing as illustrated in the Program Comment for Inter-War era housing (1919-1940). The Army will add a section to the program comment providing for qualified professional assistance and monitoring.
57	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	We recommend that the Selection Procedure be revised to include a requirement that both the SHPO and installation cultural resource management staff be involved in the implementation of the Selection Procedure prior to the replacement of historic building elements, especially if that decision impacts multiple historic resources. This extra step would not compromise the efficiency of the Program Comment; it would simply bring more federal assets to bear to help ensure its proper implementation and would incorporate existing institutional knowledge and expertise. This would also create a record of preservation decision-making and would likely encourage more careful deliberation during the selection procedure.	This recommendation is inconsistent with the purpose and intent of Program Comments. A program comment as stated in 36 CFR 800.14(e) operates in lieu of individual project reviews by SHPOs and others. Such reviews have proven unnecessary based on the successful implementation of the same process for Inter-War era housing, and would add certainly create additional process delays as currently experienced under such review provisions in current installation-specific NHPA agreements. Additionally, a benefit of the program comment is to reduce the workload on Army CRMs who are already understaffed and overwhelmed with ever increasing workloads and the program comment will also reduce the workload of SHPOs, who according to NCSHPO are similarly understaffed and overwhelmed with workload.
58	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	Meanwhile, it is also important to include the historic preservation professionals from the installations with pre-1919 homes as part of the Program Comment Development Process in the first place. Their knowledge and experience regarding the kinds of problems that arise and the kinds of alternative materials that would be appropriate is essential to ensuring that the program comment will be carefully tailored to address the necessary issues.	Army historic preservation professionals are involved in Army program comment development.
59	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	We oppose the inclusion of "lease, transfer, and conveyance" as management actions covered by the program comment. The Program Comment Plan states that "lease, transfer, and conveyance" will be treated as management actions whose likely effects are not adverse. ⁴ However, this assumption is inconsistent with the Section 106 regulations, which specifically require that, in order for the transfer, lease, or sale of federal property to avoid adverse effects, the transaction must include "adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance." 36 C.F.R. § 800.5(a)(2)(vii). No such restrictions would apply under the Program Comment Plan. As a result, for example, the Army could convey the pre-1919 homes at Fort McNair in Washington, DC, out of federal ownership, with no historic preservation requirements whatsoever, and the unrestricted conveyance would be exempted by the program comment from any Section 106 consultation.	This comment has been addressed and resolved with the National Trust during the consultation conferences. This definition will be revised in the proposed program comment. Army indicated the intent of this management action is solely for the purposes of and internal operation of the RCI program to continue the use as housing and for associated purposes that support housing operations. The Army will clarify and to state in the program comment that this management action only includes transfers between privatized housing partners, and between privatized housing partners and the Army for those purposes.
60	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	In any event, more than 90% of the Army's pre-1919 historic homes are already the subject of existing ground leases that extend through 2055. ⁵ The proposed term of the program comment is calculated to coincide with that 2055 expiration date. Thus the inclusion of "lease, transfer, and conveyance" seems unnecessary, unless it is calculated to provide a mechanism for conveying those properties not already subject to private management agreements. However, the Program Comment Plan elsewhere states that the Army will use the program comment "in lieu of" any lease or conveyance documents, or development agreements. ⁶ This seems to call into question whether the Army intends to comply with its existing responsibilities under these ground lease agreements.	Resolved, see comment above.
61	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The easiest way to resolve this issue would be to delete "lease, transfer, and conveyance" from the scope of management actions subject to the program comment. Another solution would be to add a requirement that "lease, transfer, and conveyance" transactions would only be covered by the program comment if the transactions include "adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance." Since lease, transfer, and conveyance transactions would presumably be rare in any event, the adequacy of those restrictions or conditions should be approved by the ACHP to ensure national consistency.	Resolved, see prior two comments above.
62	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Army's estimate of the cost of compliance with historic reservation standards appears exaggerated. In the Program Comment Plan, the Army states, "[I]t is estimated that it will cost Army privatized housing partners an additional \$1.1 billion to \$1.7 billion through 2055 to meet historic preservation-related requirements driven by installation-level PAs and the Secretary's Standards and Guidelines." ⁷ This cost estimate, which equates to roughly \$35-\$54 million per year, lacks credibility, especially since it is solely for residential housing. The National Trust would like more documentation about the data behind this cost estimate, and we would like to work with the ACHP and the Army to help find better ways to control the costs of preservation for the Army. For example, since the Residential Communities Initiative program has now been in effect for more than a dozen years nationwide, compiling and disclosing the actual costs incurred for compliance with historic preservation requirements during that period would be useful data.	The estimated costs are an estimation of the total requirements provided by Army housing consultants, not the RCI partners. The Army has the largest actively used inventory of historic housing in the federal government with over 30,000 historic homes, a number that will grow to 100,000 over the next 50 years and must be addressed in any calculations. A supplemental information briefing regarding cost information was provided to stakeholders including the National Trust during the consultation conferences and is posted on the Program Comment website.
63	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	Sharing the documentation and data behind these cost estimates could help to repair a significant lack of trust between the preservation community and the Army, which stems in part from the known disreputability of the Army's privatized housing partners. As you know, some of those privatized housing partners have committed criminal fraud and have been under investigation by Congress. ⁸ Fundamentally, the Army's privatized housing partners are for-profit businesses, in many cases multinational corporations that have fiduciary duties to their shareholders that supersede their duties to our nation's soldiers and to our nation's history. The National Trust would like to work with the Army and the ACHP to ensure that these corporations are not misleading the Army and the public as to the actual cost of compliance with historic preservation standards. Sharing the data behind the Army's cost of compliance estimate would be an appropriate and productive way to begin that conversation.	The Army will pass these comments on to the Army's privatized housing partners for their consideration.
64	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Proposed Program Comment Plan fails to comply with the mandate under Section 110(f) of the NHPA to minimize harm to National Historic Landmarks to the maximum extent possible. The Program Comment Plan assumes that, because the proposed Program Comment would not include demolition, new construction, and cessation of maintenance, the Army is therefore minimizing harm to the maximum extent possible, as required by Section 110(f). ⁹ We strongly disagree. Just because the adverse effects could be worse does not mean that adverse effects are avoided or minimized. On the contrary, the proposed Program Comment would specifically authorize adverse effects to National Historic Landmarks by rubber-stamping alterations that are not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The proposed Program Comment also fails to require consideration of replacement-in-kind as a priority before resorting to alternative materials as a last resort. And the Program Comment would "replace" the historic preservation and maintenance requirements in existing Section 106 agreements ¹⁰ – which have been negotiated by consensus and tailored to the needs and characteristics of each specific site – and substitute instead a one-size-fits-all template that will allow alterations resulting in adverse effects. This will exacerbate harm to historic properties rather than minimizing harm.	The proposed program comment fully complies with the NHL requirements of the NHPA. There is no "rubber stamping" all management actions. The program comment is consistent with the SOI Standards for Rehabilitation and its effect is not adverse. The National Trust has provided no specific information or analysis to justify their statement regarding compliance with NHPA and SOI Standards. The materials selection process clearly considers in-kind replacement. The current project by project review process under installation PAs has in fact led to declining housing conditions and their continuation will in fact exacerbate those conditions.
65	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Army itself has explicitly acknowledged the potential adverse effects of its program comments on National Historic Landmarks by exempting NHLs from its Inter-War Era Program Comment for the very purpose of minimizing harm to those NHL properties and complying with Section 110(f). This Proposed Program Comment Plan makes no such effort and thus fails to comply with Section 110(f).	Prior Army program comments for housing excluded NHLs because those program comments include the adverse effect actions of cessation of maintenance and demolition. The Army will ensure the program comment for pre-1919 housing specifically excludes those adverse effect actions and fully complies with NHPA and SOI Standards for Rehabilitation.
66	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Program Comment Plan fails to include any meaningful mitigation for the adverse effects imposed on National Historic Landmarks. The Proposed Program Comment Plan states that "The Army will not implement any further historic property identification, evaluation, documentation in connection with pre-1919 housing and the management actions covered by the program comment. The pre-1919 housing is adequately identified, evaluated, and documented by existing mitigation documents . . ." ¹¹ Accordingly, more robust mitigation must be developed through consultation, which will be commensurate with the adverse effects that will result from the Program Comment.	The effect is not adverse. Additional treatment beyond the extensive documentation already prepared is therefore unnecessary. Nonetheless the Army has agreed to take additional actions including adding a section to the program comment providing for qualified professional assistance and monitoring. Further extensive mitigation measures have already been implemented including collection and analysis of all original Quartermaster Corps floorplans, extensive HABS documentation, and historic context development.
67	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Annual Report and Annual Meeting should not be limited to the Army and the ACHP. Section 10.0 of the Program Comment Plan proposes an annual report from the Army that would be provided exclusively to the ACHP, and an annual meeting that is exclusively between the Army and the ACHP, unless the ACHP requests the addition of "ACHP identified invitees." ¹² This is severely inadequate. At the very least, the distribution and invitation list for the annual report and annual meeting should include the National Park Service, National Conference of State Historic Preservation Officers, all SHPOs with pre-1919 Army homes within their states, and all other consulting parties who have submitted comments.	The ACHP includes those organizations mentioned within its membership. The Army will adjust the proposed program comment to make meeting invitation more explicit.

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68	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	In sum, based on these comments, and the many others being submitted by SHPOs and consulting parties, substantial revision is going to be needed to the proposed Program Comment in order to address and resolve the many concerns, criticisms, and objections being raised in response to the Program Comment Plan. We urge the Army to pause the current fast-track process in an effort to revise the proposal in order to avoid a negative vote by the ACHP membership.	The Army will take all comments into account and will continue to work with the ACHP to further develop the proposed program comment to help ensure approval.
69	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	The Oklahoma State Historic Preservation Office (OKSHPO) participated in every conference call (six) pertaining to the development of the Department of the Army Program Comments for the pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features as presented by the Army Federal Preservation Officer (FPO) and staff. The OKSHPO fully engaged in the process as Fort Sill (Base) has this housing type. Overall, the OKSHPO has serious reservations about the adoption of the Program Comments in relation to Fort Sill. Through the years, Fort Sill and the OKSHPO have worked to create a strong working relationship, based on difficult past experiences for the Base and the OKSHPO. Out of this experience has come many agreement documents that are specific to the Base which are far more meaningful to both the Base and the OKSHPO than what the FPO is proposing in this Program Comment. The proposed Program Comments do not address existing ICRMPs or other agreement documents. Conversations have also indicated that this Program Comment will supersede any existing agreement documents with relation to the Base. While Base command rotates every two to three years, the environmental staff remains, meaning that the Section 106 process remains, intact and consistent regardless of command changes. The Fort Sill staff are quite competent and take a great deal of pride in their historic resources. The proposed Program Comments are incongruent with everything the Base, the privatized housing partners and the OKSHPO have worked to implement for the review process specific to Fort Sill; this Program Comment has the potential to make things more difficult for all parties involved. The document indicated that pre-1919 housing areas and historic districts are equivalent to (modern) urban housing developments, and that due to the "significant prior ground disturbance," namely construction and modifications to existing buildings, these areas should be considered to have low probability for significant archaeological properties. We consider this to be an unrealistic expectation. The presence of pre-1919 housing indicates early military occupation/use at these locations, and the ground beneath pre-1919 buildings are less likely to have been disturbed in the time since their construction than surrounding areas. For that reason, there is an increased likelihood that buried archaeological features or deposits may be present. Given that these deposits are likely associated with early occupations at the military site, such archaeological resources may well be significant. We maintain that the Program Comment should recommend archaeological investigations or archaeological monitoring and reporting when ground disturbance is scheduled to occur. This Program Comment only addresses historic archaeology; prehistoric sites should also be afforded this same consideration.	Acknowledged The privatized housing part who operates the housing at Fort Sill is in favor of the program comment since it will address the issues that have developed from operating under existing processes and agreements over the past 15+ years.
70	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	While there is no denying that material prices have reached an all time high due to many factors: pandemic, inflation rates and federal mandates/regulations, the sole source contracting practices at military installations is a large issue that is not being addressed. A six-window project for a shed in the NHL at Fort Sill came at a price of \$500,000. Were that project competitively bid, the price for six windows to be repaired would not have been that costly. The sole source practice resulted in the project being "killed" and the building not being put back into service. The Army also provided comparative prices for a window project at Fort Belvoir during the six virtual meeting presentations as an example, and while those numbers achieved the desired impact, the question remains: were they competitively bid or was it yet another example of sole sourcing? As with other agencies and tax credit projects throughout the country, we would recommend a more rigorous, truly competitive bidding process.	The program comment does not include demolition or as have prior program comments so extensive ground disturbance beneath pre-1919 homes will not occur under this program comment. The Army will review and ensure that the proposed program comment addresses all archeological properties including known properties and properties that may be discovered as a result of program comment actions.
71	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	As was mentioned throughout the virtual Army consultation meetings in November and December, many installations have full time staff that meet SOI qualifications and are more intimately familiar with the properties than their housing partners. We would recommend that installation staff participate in the decision-making rubric for what materials are used and in which situations they will be used.	Army as a general rule competes its contracts, sole source contracting is rare and requires significant justification and approval by a warranted contracting officer. Commenter is likely confusing task orders issued on a contract that had been competitively bid and awarded.
72	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	With regards to Materials Catalogue, for the privatized housing partners who wish to take advantage of the federal historic preservation tax credit, the substitute materials will not be an acceptable method of rehabilitation by the Technical Preservation Services division of NPS. A provision with the document that outlines what steps shall be taken when planning for utilization of the historic preservation tax credit should be clearly identified in the Material Catalogue.	Installation staff are no more familiar with historic homes than the privatized housing partners who have owned and operated the homes for over 15 years. The Army will add a provision to the proposed program comment to provide privatized housing partners with SOI qualified technical experts to assist in implementing the program comment.
73	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Page 3, 4th paragraph - "Implementation if the installation-specific ..." should be "Implementation of the installation-specific ..."	The statement is not correct. According to the National Park Service, their Technical Preservation Services has approved thousands of tax credit projects using substitute materials.
74	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Page 4, 1st paragraph - "... associated with of this housing." should be "... associate with this housing."	Thank you for this editorial change
75	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Page 13, last line - "The has posted ..." should be "The Army has posted ..."	Thank you for this editorial change
76	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Page 20, line item d. - "Determine if a historic materials ..." has both singular and plural tense. Should be one or the other.	Thank you for this editorial change
77	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Page 21, 2nd paragraph - "... by phone, videoconference, or any ..." should be "... by phone, video conference, or any ...?"	Thank you for this editorial change
78	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Page 25, 3rd paragraph - "... development that area eligible for inclusion ..." should be "... development that are eligible for inclusion ..."	Thank you for this editorial change
79	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Finally, while we appreciate the effort put into this Program Comment, a document such as this deserves more consideration. The OKSHPO also believes that a condition should be written that allows the Installations to choose if they participate in this Program Comment	The housing is owned and operated by the Army's privatized housing partner at each installation. Partners unanimously support the program comment approach along with Army's senior leaders at all levels.
80	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	Thank you for hosting the recent meetings and allowing interested parties to comment on the proposed Program Comment	Acknowledged
81	Lynda Ozan	OK SHPO	12/20/2023	Oklahoma SHPO	As noted, a total of 378 of the pre-1919 homes addressed by the proposed Program Comment are in Kansas with 269 at Fort Leavenworth and 109 at Fort Riley. These homes comprise 43 percent of the Army's inventory of pre-1919 housing. The proliferation of pre-1919 housing at Fort Leavenworth and Fort Riley illustrates the history of the US Military and its particularly heavy presence in Kansas and the American West between 1827 and the conclusion of World War I due to the presence of historic trails (Santa Fe, Oregon, California Trails), Bleeding Kansas, the western theater of the Civil War, and the Indian Wars. Furthermore, Fort Leavenworth and Fort Riley played a significant role in housing and training military personnel during the Spanish-American War and World War I. The history of the U.S. Army and the history of Kansas are inherently intertwined. Consequently, the Kansas State Historic Preservation Office (SHPO) has a strong interest in ensuring the preservation of nearly half of the most historically significant pre-1919 housing on active military installations. Utilizing the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) aids us in that goal	Acknowledged. The Program Comment implements the SOI Standards for Rehabilitation
82	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO		
83	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO		

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84	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>The Kansas SHPO recognizes that the pre-1919 housing is located on secured areas of military installations, but we also acknowledge that this has no bearing on the importance of preserving these structures. Although these structures are not typically open to public viewing, the same could be said about most archaeological sites and many privately-owned buildings (i.e. private residences, farmsteads, etc) listed in the National Register of Historic Places (NRHP). Therefore, the security requirements of military installations do not negate the importance of preserving pre-1919 housing in accordance with the SOI Standards, especially those designated as National Historic Landmarks (NHL).</p> <p>In addition, the Kansas SHPO concurs with the Texas Historical Commission and others that the proposed Program Comment does not meet the SOI Standards. Specifically, when removal and replacement of original building materials may occur without appropriate consideration of the historic significance of the property or achieving a close visual match. Furthermore, the core pre-1919 housing area at Fort Leavenworth is a National Historic Landmark (NHL). These properties are given a higher standard of care than non-NHL properties as prescribed by the Section 110 guidelines published by the National Park Service. Cumulative loss of historic materials over time can jeopardize the status of NHLs as well as National Register-listed and eligible properties. Additional notes, comments, and questions are provided in the enclosed PDF copy of the Program Comment.</p>	<p>There is minimal public use value because access by the general public to Army housing areas is highly restricted.</p> <p>Thank you for the comments in the pdf document, they will be closely reviewed and incorporated as appropriate. The program comment will implement the Secretary's Standards for Rehabilitation (36 CFR 68.3 (b)) by means of a standardized approach and methodology with specific criteria and procedures for selection of appropriate building materials that considers the economic and technical feasibility of each project. Detailed design guidelines and building material guidelines and catalog are also included to assist in the materials selection process. The first consideration in that process is for the repair of historic building materials, if repair is not possible the process proceeds to consideration of appropriated in-kind or substitute building materials. Substitute building materials used are reversible, and can be replaced with in-kind materials at any time. The use of in-kind and imitative substitute materials will achieve a close visual match as demonstrated by their use under the Army's Program Comment Inter-War Era housing. Additionally, the entire process will be assisted by technical support from SOI qualified experts. This program comment also implements the ACHP's Policy Statement on Climate Change and Historic Preservation by explicitly incorporating climate resiliency considerations in the building materials selection process. Clearly, any removal and replacement of original historic building materials will occur with appropriate consideration of the historic significance of the property. Agree. The Program Comment will comport with these statements.</p>
85	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>Naturally, the Kansas SHPO understands the challenges of ensuring the quality of life, health, and safety standards in historic housing. The SOI Standards do not prevent the necessary upgrades to and maintenance of these properties. Nor do the Standards prevent use of alternative materials when historic features and materials have been demonstrated to be beyond repair as determined by a qualified professional. For example, mechanical systems such as HVAC units, electrical wiring, plumbing, etc. are typically not seen as historically significant. Sensitive upgrades and compatible installation of new systems and materials help to ensure that the historic housing can be preserved for the benefit of future generations of personnel who will serve at Fort Leavenworth and Fort Riley. They are an integral part of the maintenance requirements for the preservation of historic properties</p>	<p>This comment does not fully reflect the requirements of the Secretary's Standards. The Secretary's Standards require that they be applied considering the economic and technical feasibility of each project. The building materials selection procedure informed by the Guidelines in appendices A and B will ensure use of appropriate matching materials that will maintain the historic character of the housing.</p>
86	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>Likewise, the Kansas SHPO recognizes that other forms of critical maintenance are also needed to preserve these historic resources. Such forms of maintenance include painting, timely repair or replacement of failing features like porch floors, and replacement of roof shingles. The Kansas SHPO does not see a conflict over the use of sensitive alternative materials when appropriate such as the use of asphalt shingles that are specifically designed to replicate the look of shake shingles or using modern deck materials that mimic the appearance of tongue & groove porch flooring. Naturally, inappropriate materials and incompatible construction practices should be avoided. For example, exterior deck flooring with wide gaps between boards, composite materials with fake wood grain, and vinyl siding and vinyl windows that do not accurately replicate the profiles and dimensions of historic wooden counterparts should not be used</p>	<p>Consideration of tax credits will be incorporated into the materials selection process.</p>
87	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>To facilitate the maintenance of historic structures, including repairs necessary for life, health, and safety, the State of Kansas offers State Historic Rehabilitation Tax Credits which can offset the costs of repairs that meet the SOI Standards. These tax credits must be factored in when comparing the costs of maintaining historic properties. Additionally, they must be considered when comparing the costs of repairs that meet the Standards versus repairs that do not meet the Standards. The current Program Comment for pre-1919 housing does not adequately consider this financial incentive.</p>	<p>See Preservation Brief #16 and discussion the inadequate durability of modern wood used for example in in-kind wood windows. Imitative substitute vinyl windows are more durable than in-kind wood windows and achieve an appropriate visual match. Many high quality vinyl windows come with a lifetime warranty. Analyses of historic wood windows, in-kind wood windows and vinyl windows used on Inter War Era Housing (1919-1940) was presented during the Program Comment consultation in the <i>Supplemental Information</i> briefing posted at https://www.denix.osd.mil/army-pre1919-pchh/. That information demonstrated that imitative substitute vinyl windows have significantly lower initial cost than repair of historic widnows or replacement in-kind windows, reduce the time homes are offline, lower long-term maintenance cost, longer warranty period, improve energy efficiency, and preserve the historic character of the Inter-War Era housing.</p>
88	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>The cost estimates in the current Program Comment for pre-1919 housing do not consider the limitations and lifespan of imitative materials. For example, they do not account for the potentially limited lifespans of vinyl windows and other insensitive imitative materials. Furthermore, the greenest building is one that is already standing because of the embodied energy that has already been expended. It should be acknowledged that materials like vinyl are not environmentally sustainable and do not perform well in extreme weather conditions.</p>	<p>The process in the Program Comment ensures that any new in-kind or imitative substitute materials provide a visual match.</p>
89	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>The Kansas SHPO understands the need to consider climate-related issues when preserving historic buildings. Many older buildings/homes were designed with climate in mind before modern HVAC systems were invented. For example, wide sweeping roofs, high ceilings, and dog trots can be found in hot climates such as the American South. Likewise, thick stone walls, strategically placed windows, and steep roofs are beneficial in colder climates such as the Upper Midwest. Many of the pre-1919 houses at Fort Leavenworth and Fort Riley include similar design considerations. Where necessary, new materials that have a better climate-resilient record should be considered, but only when the original materials are beyond repair and when the new materials are designed to provide a visual match.</p>	<p>The Program Comment will specify that SOI qualified experts are available to assist in the materials selection process. The high costs of historic building materials, in-kind building materials and the specialized craftsmen required as installation PAs and the Secretary's Standards have been implemented over the past 15 plus years has led to the inability to fully implement scopes of work for pre-1919 housing repairs and improvements. This has caused to a backlog of deferred repairs and improvements and has led some pre-1919 NHL homes to be entirely vacated. The approach used in the implementation of installation PAs and the Secretary Standards over the past 15 years has ironically had a negative effect on the overall condition of the homes.</p>
90	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>Finally, we note that in our experience working with both Fort Riley and Fort Leavenworth, the qualified professional staff employed by the Army have a clear understanding of the preservation needs of these resources. Unfortunately, it is often the private housing partners that do not have qualified staff or do not engage in consultation with the Army staff and SHPO to work out viable alternatives when historic materials need replacement. We are seeing a continued loss of historic features and materials due to simple neglect, including highly significant properties like the Rookery at Fort Leavenworth. If qualified professionals are not employed to enact the procedures outlined in the Program Comment, the procedures will result in adverse effects to historic properties. The concept in the Program Comment that such adverse effects can be offset by existing archival documentation to serve at mitigation does not follow the spirit or rule of federal preservation law.</p>	<p>Tax credit information will be included in the Program Comment.</p>
91	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO	<p>Kansas SHPO believes that the pre-1919 housing can be used as part of the plan to alleviate the current housing crisis on U.S. Army Installations. We encourage the Army and their private housing partners to take advantage of State and Federal Historic Tax Credits and maintain the inventory of pre-1919 housing as an integral part of the active housing at Fort Riley and Fort Leavenworth by carefully considering significant edits to this Program Comment to address the concerns of consulting parties.</p>	
92	Patrick Zollner	KS SPHO	1/16/2024	Kansas SHPO		

**Administrative Record for Program Comment for Preservation of Pre-1919 Historic Army Housing
Invitation to the Department of Army NHPA Section 106 Program Consultation Responses - Tribal**

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	COMMENT	DECISION (A/R/M)
	Timothy Wilcox	Agua Caliente Band of Cahuilla Indians	12/13/2023	THPO	A records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.	Received
	Mandi Campbell	Timbisha Shoshone	10/23/2023	THPO	Yes Timbisha Shoshone THPO will attend	Received
	ALEX R. WATTS-TOBIN	Karuk Tribe	10/23/2023	THPO	We are not aware of any qualifying DoD historic buildings within Karuk Territory, which includes the towns of Orleans, Happy Camp, and Seiad Valley in Happy Camp, and some trust lands in a section of Yreka, CA.	Received
	Sara Childers	Flandreau Santee Sioux Tribe	10/23/2023	THPO	The Flandreau Santee Sioux Tribe has an interest in some of the Army's Pre-1919 Historic Housing, associated buildings, structures and landscape features. We will participate in the series of nationwide Section 106 consultation conferences for the Army's proposed Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features (Program Comment).	Received, we will include you as an interested party and provide you the consultation meeting notifications.
	Ben Rhodd	Forest County Potawatomi	11/1/2023	THPO	Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community (FCPC), a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act. The Tribal Historic Preservation Office (THPO) staff has reviewed the information you provided for this project. Upon review of site data and supplemental cultural history within our Office, the FCPC THPO is pleased to offer a finding of No Historic Properties affected of significance to the FCPC, however, we request to remain as a consulting party for this project. As a standard caveat sent with each proposed project reviewed by the FCPC THPO, the following applies. In the event an Inadvertent Discovery (ID) occurs at any phase of a project or undertaking as defined, and human remains or archaeologically significant materials are exposed as a result of project activities, work should cease immediately. The Tribe(s) must be included with the SHPO in any consultation regarding treatment and disposition of an ID find. Thank you for protecting cultural and historic properties and if you have any questions or concerns, please contact me at the email or number listed below.	Received, we will include you as an interested party and provide you the consultation meeting notifications.

Row Labels	Count of NAME OF REVIEWING OFFICIAL
American Cultural Resources Association	6
Hawaii State Historic Preservation Division	5
Historic Hawaii Foundation	16
National Trust for Historic Preservation	20
Public	5
Texas Historical Commission	16
(blank)	
Grand Total	68

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	COMMENT	Topic
1	Michael Ravnitzky	N/A	10/23/2023	Public	I am writing to express my support for the Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. I think this plan is a reasonable and practical one, considering the challenges and opportunities that the Army faces in preserving and managing its pre-1919 historic housing and associated features. I believe that this plan will help the Army to balance its preservation and operational goals, while also ensuring consultation and coordination with relevant stakeholders and the public. I commend the Army for recognizing the historical and cultural value of its pre-1919 historic housing and associated features, and for taking steps to protect and maintain them. These properties represent the Army's earliest efforts to provide adequate housing for its personnel and their families, as well as to create a sense of community and identity among them. They also reflect the Army's role and mission in shaping the history and development of our nation. By preserving these properties, the Army not only honors its past, but also inspires its present and future generations. At the same time, the Army must be cognizant of costs associated with such preservation. I also appreciate the Army's efforts to follow to the greatest degree possible the established best practices and guidelines for historic preservation, such as the Section 106 of the National Historic Preservation Act (NHPA), the Secretary of the Interior's Standards for the Treatment of Historic Properties (SIS), and the Historic Housing Management Plan (HHMP). I think that these procedures and standards will ensure that the Army's actions are consistent with the historic character and integrity of its pre-1919 historic housing and associated features, and that they are documented and reported accurately and transparently. However, I also have some suggestions for improving the plan document during this public comment phase. I hope that these suggestions will help the Army to enhance the quality and clarity of the document, as well as to address some potential concerns or questions that the public or other stakeholders might have about the plan.	General
2	Michael Ravnitzky	N/A	10/23/2023	Public	Provide more data or evidence to support the claims - I respectfully suggest that the Army provide more quantitative data or evidence to support its claims that the current Section 106 compliance process is inefficient and ineffective, and that the proposed Program Comment would result in significant improvements. For example, how much time and money does the Army spend on average for each Section 106 review of its pre-1919 historic housing and associated features? How much time and money would the Army save by using the Program Comment instead? How many pre-1919 historic housing and associated features are affected by the current Section 106 compliance process? How many of them would be covered by the Program Comment? Providing such data or evidence would help in understanding the rationale and benefits of the proposed action, as well as to evaluate its feasibility and impact.	Data / evidence to support
3	Michael Ravnitzky	N/A	10/23/2023	Public	Address any potential conflicts or disagreements that may arise - I respectfully suggest that the Army explain how it would address any potential conflicts or disagreements that may arise between it and other parties regarding the management or treatment of its pre-1919 historic housing and associated features. For example, how would the Army resolve any disputes or complaints that may occur with the State Historic Preservation Officer (SHPO), the Tribal Historic Preservation Officer (THPO), the Advisory Council on Historic Preservation (ACHP), or other interested parties over its actions under the Program Comment? How would the Army handle any appeals or challenges that may be filed against its decisions or determinations under the Program Comment? How would the Army ensure that its actions under the Program Comment are transparent and accountable? Addressing such issues would help establish trust that the Army would act in good faith and in accordance with the law when using the Program Comment.	Implementation
4	Michael Ravnitzky	N/A	10/23/2023	Public	Provide more examples or illustrations of how the Program Comment would work in practice - I respectfully suggest that the Army provide some examples or illustrations of how it would identify, document, treat, or report its pre-1919 historic housing and associated features under different scenarios or situations. For example, how would it determine whether a property is eligible for listing in the National Register of Historic Places (NRHP) or not? How would it develop and implement a HHMP for each installation or facility that has pre-1919 historic housing and associated features? How would it apply the SIS when carrying out actions that may affect these properties? How would it consult and coordinate with relevant stakeholders on these actions? How would it document and report these actions to these stakeholders? Providing such examples or illustrations would help in understanding how the plan/process would affect or benefit these properties in reality.	Implementation
5	Michael Ravnitzky	N/A	10/23/2023	Public	In conclusion, I reiterate my support for the Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. I think this plan is a reasonable and practical one, and that it will help the Army to balance its preservation and operational goals, while also ensuring consultation and coordination with relevant stakeholders and the public. I also think that this plan is important for preserving our nation's history and honoring the Army's past, present, and future generations. I hope that the Army will consider my suggestions for improving the plan document during this public comment phase.	General
6	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	Thank you for the opportunity to comment on this request from the Department of the Army (Army) for consultation on the Program Comment Plan for Preservation of pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. The program comment plan was posted in the Federal Register on Monday, October 23, 2023 (vol. 88, no. 203, pg. 72743). The Hawaii State Historic Preservation Division (SHPD) has reviewed your submittal and do not agree that program comment is an appropriate method for preserving pre-1919 historic army housing. We have attached detailed comments on the proposed Program Comment Plan to this letter. If you have any questions about letter or attached comments, please contact Jessica Puff, Architecture Branch Chief, at (808) 692-8015 or by email at jessica.puff@hawaii.gov	
7	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	The proposed Army Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features does not sufficiently establish a program alternative to the four-step process existing at 36 CFR Part 800 or 54 U.S. Code Part 306108. Rather, it undermines existing agreement documents, such as the Programmatic Agreement among the United States Army, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Privatization of Family Housing at US Army Garrison, Hawaii. And, it suggests that undertakings which fall under the proposed Program Comment Plan will ensure "positive historic preservation outcomes that will preserve the historic character of and the continuity of historical use of pre-1919 housing" (pg. 10, Army Program Comment Plan) without providing sufficient evidence to this effect. Additionally, it does not identify a path for considering the historic significance and requirement for resolving adverse effects. Based upon these factors and the information provide within the proposed plan, the Hawaii State Historic Preservation Officer cannot concur with the adoption of the Army Program Comment Plan	Disagreement with the need for a Program Comment
8	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	The Army identifies, within the proposed Army Program Comment Plan, that at least 74% of the 865 properties included under the plan are within National Historic Landmark districts. However, the proposed Army Program Comment Plan does not sufficiently take into consideration the unique and significant treatment measures that are necessary to be implemented in order for Army to meet their responsibilities under 36 CFR Part 800.10. Nor does it recognize the unique and significant character defining features of each designated National Historic Landmark/District (NHL). Instead, the proposed Program Comment Plan minimizes the Army's responsibilities to only a level of "minimizing harm" when "feasible" (pgs. 16-17, Army Program Comment Plan) rather than, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that maybe directly and adversely affected by an undertaking." It allows the Army to treat all National Historic Landmarks that include pre-1919 historic Army housing the same, rather than consulting with SHPOs and local consulting parties to determine best treatment measures. Thus, the exemplar scopes of work included within the proposed Army Program Comment Plan are not categorically in keeping with Secretary of the Interior Standards for the Treatment of Historic Properties.	NHLs

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9	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	The Army's justification for this programmatic approach appears to be supported by claims that treatment measures allowed under the proposed Army Program Comment Plan are more economically and environmentally responsible. However, the Army has provided no supporting evidence for their claims and cost estimates. While the Army's assertions are concerning, upon further review they appear implausible and lack sufficient validity. For example, the Army's financial projections appear to suggest that if the Army were not to implement their proposed programmatic approach they would spend approximately \$90,000/year for the next twenty-two years (almost \$2 million dollars/residential unit over the next twenty-two years) for routine maintenance and repair at each of the 865 residential units that would be covered by the proposed plan (pg. 4-5, Army Program Comment Plan). These estimates appear to be inflated to support the hypothetical need for the Army's proposed Program Comment Plan.	Disagreement with the need for a Program Comment
10	Dr. Alan S. Downer, Deputy State Historic Preservation Officer Administrator	HI SHPD	11/21/2023	Hawaii State Historic Preservation Division	Based upon the factors above, and consultation meetings held thus far, it appears that this program comment plan is being executed by the Army to create a categorical exemption from complying with Section 106 of the National Historic Preservation Act. Much like existing Program Comments, this proposed program comment plan will lead to the standard application of inappropriate preservation treatment measures, including removal of historic character defining features and application of inappropriate substitute materials, that will adversely affect the integrity of some of this nation's most significant historic resources. Such a plan should not be implemented at a national level. Instead, if there truly is a need for a programmatic approach, Army should work with the SHPOs, THPOs, and NHOs within the 14 states directly impacted by the Army Program Comment Plan.	Potential Negative Consequences of the Program Comment
11	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Thank you for the opportunity to provide feedback on the Army's proposed Program Comment for the Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. This letter serves as comment on the proposed alternate procedures from the State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission	General
12	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	The Texas Historical Commission appreciates the challenges that come with retaining and rehabilitating historic housing for modern use, and we are particularly concerned by the Congressional mandate to demolish certain pre-1919 Army housing in response to the cost of rehabilitation. Nevertheless, we find the proposed program comment diverges too far from the Secretary of the Interior's Standards for the Treatment of Historic Properties, particularly given that nearly 75% of the affected housing stock is designated as National Historic Landmarks (NHLs), either individually or as contributing to NHL districts. Safeguards within the program comment are not adequate to provide the higher standard of care federal agencies must exercise when considering activities that can adversely affect NHLs, pursuant to Section 110(f) of the National Historic Preservation Act. We respectfully disagree with the proposal to fully eliminate project-specific reviews by SHPOs and the National Park Service under these circumstances. Instead, we recommend amendment of existing programmatic agreements for Army housing to include additional streamlining measures, such as installation-specific design standards with preapproved substitute materials and systems. We have the following specific comments on the "Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Feature	NHLs / SOI Standards
13	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 6, Category of Undertaking and Likely Effects on Historic Properties. We greatly appreciate the program comment's exclusion of actions that would have an adverse effect on historic housing, namely demolition, cessation of maintenance, and new construction. However, we disagree that the management activities allowed under these alternate procedures will not have an adverse effect. While repair and ongoing use does "promote the long-term preservation of NHL and other pre-1919 Army housing," modifications that do not meet the Standards will occur under the program comment. Section 106 regulations at 36 CFR 800.5 (a)(2)(ii) include as an example of an adverse effect: "Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines". As such, provisions for mitigation should be included if the program comment is not modified to require compliance with the Standards.	SOI Standards
14	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 7, Approach and Methodology. While true to an extent, we disagree with the blanket statement that "imitative substitute building materials that have been used for roofing, windows, and other applications are reversible and can be replaced with in-kind building materials at any point in the future." Removal and replacement of original building materials can result in a loss of historic integrity, and when imitative substitute materials are used, there may be a tendency to pursue more widespread replacement to provide a consistent appearance. In a practical sense, these materials will not be replaced again with in-kind materials during their lifespan.	Imitative substitute building materials
15	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Conversely, we also disagree that the Standards for Rehabilitation "never recommend removal and replacement of deteriorated historic building materials with modern imitative substitute materials". While it is correct that selective, in-kind repair is preferable to address limited deterioration, substitute materials can be appropriate when full-scale replacement is necessary, and it is possible to match the design and visual characteristics of the material to be replaced. As an example, at Fort Sam Houston, our office has concurred with replacement of historic tongue-and-groove wood porch flooring using a paintable extruded PVC product that matches the dimensions and installation methods of the original flooring	Imitative substitute building materials
16	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 8.2, Selection Procedure. Our office understands the importance of evaluation of historic materials to determine the proper course of treatment following the Standards. We would suggest that the program comment require installations to keep an inventory of pre-1919 housing units containing lead and asbestos that have been abated, to allow the acquisition and stockpiling of building materials to save on material costs.	Historic building materials
17	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 9, Historic Preservation Tax Credits. The Texas Historical Commission fully supports participation by Residential Communities Initiative (RCI) privatized housing partners in federal and state historic preservation tax credits. However, the program comment itself does not support this goal. Use of incompatible substitute materials, widespread replacement of building materials based on considerations other than that existing historic materials are deteriorated beyond repair, and other work that does not meet the Standards will compromise housing partners' ability to obtain these incentives. Further, historic tax credits require individual project-by-project consultation with SHPOs and the National Park Service	Imitative substitute building materials
18	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 10, Annual Report and Annual Meeting. We request that the annual report also be provided to the National Park Service and the National Conference of State Historic Preservation Officers, or to the individual SHPO offices for states with pre-1919 Army housing	Annual report
19	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Section 11, Applicability and Implementation. This section should reference the Secretary of the Interior's Professional Qualifications Standards. Staff meeting the qualifications for historic architecture or architectural history should oversee application of the Selection Procedure established in Section 8.2 and interpretation of the guidance in Appendices A and B. Directives such as using imitative substitute materials only "where such materials are appropriate" or maintaining character-defining features "to the maximum extent possible" require adequate professional training in historic preservation to make the appropriate decisions. RCI privatized housing partners who would implement this program comment in Texas lack qualified staff to make these determinations.	Adequate professional training in historic preservation

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	COMMENT	Topic
20	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	While it is preferable to avoid adverse effects, the actions under this program comment will result in adverse effects to historic properties, and additional mitigation should be developed. Forms of mitigation for consideration include the following ideas. Recordation can vary between installations on properties; we recommend updating building surveys with detailed conditions assessments with photographs of every exterior elevation and Historic American Building Survey Level I recordation of all buildings within the pre-1919 housing era at each installation. Monies that would have been used for rehabilitation projects could be used to hire contractors to draw updated floorplans of pre-1919 buildings, structures, and landscapes. Installations could partner with local historic preservation groups and SHPO offices to invite contractors, local tradespeople, and students for materials conservation training schools. The schools could focus on learning how to conserve a material while working on pre-1919 properties, saving the installation time and monies. Another way to save monies could be creating templates for scopes of work with drawings of a specific type of feature and material. Populating information will be quick and save time for professionals at the installations. An interpretive publication could use existing documentation from the Army website and various primary and secondary academic sources.	Mitigation
21	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Appendix A, Design Guidelines. We appreciate the requirement to evaluate whether elements are deteriorated beyond repair before proposing replacement. However, in many of the individual guidelines, the priority of considering replacement in-kind before turning to imitative substitute materials is not clearly conveyed. The guidelines also do not always fully cover the range of available alternatives that would allow retention of historic materials. For instance, under the Guidelines for Interiors (p. 34), encapsulation of paint is the only alternative mentioned before removal of the underlying feature in its entirety; the lead-based paint could be abated. The discussion of plaster lacks any mention of decorative plaster, such as moulding or medallions, which should be retained even if adjacent flat plaster is replaced with gypsum board. Only historic interior doors, and not other elements that may be removed and replaced, are recommended to be salvaged for possible reuse.	Design Guidelines
22	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Preservation Brief 16: The Use of Substitute Materials on Historic Building Exteriors provides criteria for the evaluation of substitute materials at historic properties and should more clearly inform the program comment's approach. Substitute materials that are only "similar" in their size, configuration, and other physical characteristics will not meet the Standards for Rehabilitation and will erode the integrity of the housing stock.	Imitative substitute building materials
23	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Appendix B, Building Materials Catalog. As with the Design Guidelines, the priority of considering replacement in-kind before turning to imitative substitute materials is not clearly conveyed	Building Materials Catalog
24	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Throughout, there is a stated preference for artificial woodgrain in substitute materials to replace wood. Generally, with these types of substitute materials, a smooth finish is preferable to emulate the texture of sanded and painted wood elements, rather than that of weathered or deteriorated wood. While we concur that matching original colors based on paint analysis is not necessary, the record of those original colors may be lost with complete replacement of historic materials.	Imitative substitute building materials
25	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	The catalog includes multiple examples of imitative substitute materials that are widely regarded as incompatible in historic preservation applications, such as vinyl or aluminum siding and vinyl windows. It includes many others that may be compatible in certain circumstances but would require careful evaluation. For windows, an applied muntin grid on the outside can achieve a good match for the historic appearance, but muntins between the two panes of glass is not a convincing suggestion of a historic window's appearance. We support the development of standardized replacements tailored to buildings of the same design, provided that the replacement windows are a good match for the historic windows. For instance, Joint Base San Antonio regularly uses an aluminum window that meets antiterrorism/force protection requirements and provides a good match for the overall design, configuration, dimensions, and profiles of the historic wood windows at Fort Sam Houston.	Imitative substitute building materials
26	A. Elizabeth Brummett, Deputy State Historic Preservation Officer	THC	11/21/2023	Texas Historical Commission	Again, thank you for the opportunity to comment during the development of this significant policy change. If you have any questions concerning our remarks, please contact Elizabeth Brummett at 512-463-6218.	General
27	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	The American Cultural Resources Association (ACRA), the trade association for firms that specialize in cultural resource management (CRM), appreciates this opportunity to comment on the Department of the Army's Program Comment Plan for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features. ACRA member firms undertake much of the legally mandated CRM studies and investigations in the United States and employ thousands of CRM professionals, including anthropologists, archaeologists, architectural historians, historians, and an increasingly diverse group of other specialists. To help guide smart, sustainable economic development and safeguard important historic and cultural heritage assets, ACRA members apply specialized research skills w Section 106 of the National Historic Preservation Act (NHPA) is the cornerstone federal policy that balances the need to build our nation's infrastructure with the need to preserve our past. CRM professionals and their clients respect the Section 106 process because it provides a clear, consistent roadmap to enable projects to move forward while considering their impact on the country's diverse cultural heritage. Communities value the process because Section 106 gives citizens a voice in preservation.ithin a framework of federal, state, local, and/or Indian Tribal laws and regulations, facilitating an open dialog where every stakeholder has a voice. Section 106 of the National Historic Preservation Act (NHPA) is the cornerstone federal policy that balances the need to build our nation's infrastructure with the need to preserve our past. CRM professionals and their clients respect the Section 106 process because it provides a clear, consistent roadmap to enable projects to move forward while considering their impact on the country's diverse cultural heritage. Communities value the process because Section 106 gives citizens a voice in preservation.	General
28	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	Program comments are a useful tool to enable federal agencies to consider a group of similar undertakings to be addressed under the Section 106 process, instead of addressing each undertaking individually. Programmatic comments consider repetitive management actions that would not lead, inadvertently or otherwise, to the destruction of buildings and other assets of historical or cultural significance.	General
29	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	ACRA is encouraged by the fact that the Program Comment Plan for Pre-1919 structures and features excludes adverse effect actions, such as demolition, cessation of maintenance and new construction. This is, as the Army notes, a departure from other Army program comments. ACRA believes that, in situations where the Army determines that demolition and new construction are warranted, the letter and spirit of the NHPA demand that such undertakings undergo consultation.	General
30	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	Likewise, ACRA is pleased that the Program Comment Plan does not rely on the term "Properties of Particular Importance" (PPI), which was used in its Proposed Program Comment for Army Vietnam War Era (1963-1975) Historic Housing, Associated Buildings and Structures, and Landscape Features. PPI lacks legal meaning in federal preservation law and regulations.	General

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	COMMENT	Topic
31	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	Although ACRA recognizes that there are financial benefits of the use of imitative materials, and in some cases the Army needs to replace historic building materials for hazard abatement purposes, it is important that the use of historic materials not be erased from history. ACRA suggests that the Army consider ways to ensure documentation of historic materials when they are replaced, or explore restoring a select group of structures using historic materials while using imitative materials on the remaining buildings. Such replacements should be investigated using the Secretary of the Interior's Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction.	Imitative substitute building materials
32	Amanda Stratton, Executive Director	ACRA	11/22/2023	American Cultural Resources Association	ACRA appreciates having this opportunity to comment on the Army's Program Comment Plan.	General
33	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Historic Hawaii Foundation (HHF) received notice of the Army's Notice of Availability (NOA) for the Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features (Army Program Comment Plan) published in the Federal Register on October 23, 2023, at 88 FR 72743. The NOA initiates a 30-day public review and comment period for the Army Program Comment Plan. HHF accepts the invitation to participate in the consultation for the development of this Program Comment.	General
34	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Historic Hawaii Foundation is a statewide nonprofit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawaii. HHF is a consulting party to the Army and other federal agencies pursuant to the implementing regulations of the NHPA at 36 Part 800.2(c)(5) as an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties	General
35	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	HHF was a consulting party in the Army's prior Program Comment consultations for Inter-War Era Historic Housing and Vietnam War Era Historic Housing and is a concurring party to the Programmatic Agreement Among the United States Army, the Hawaii State Historic Preservation Officer and the Advisory Council on Historic Preservation for the Privatization of Family Housing at US Army Garrison Hawaii (2004). HHF is also registered with the U.S. Department of Interior as a Native Hawaiian Organization (NHO), as an organization that serves and represents the interests of Native Hawaiians, has a stated purpose as the provision of historic preservation services to Native Hawaiians, and has knowledge about and commitment to preservation of historic properties to which Native Hawaiians attach religious and cultural significance.	General
36	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Description of Undertaking- The proposed Program Comment will affect 17 historic housing units contained within Army Garrison Hawaii. Fourteen (14) of those units are contained within the Palm Circle National Historic Landmark at Fort Shafter and three (3) units are located on General's Loop in the Schofield Barracks Canby Neighborhood. As stated in the Proposed Program Comment: "NHPA Section 306108 requires Federal agencies to take into account the effects of projects they carry out, license, or assist (undertakings) on historic properties, and to provide the ACHP a reasonable opportunity to comment regarding such undertakings. The ACHP has issued the regulations codified under 36 CFR 800 that set forth the process through which Federal agencies comply with the procedural responsibilities of NHPA Section 306108." "Under 36 CFR 800.14(e), federal agencies can request the ACHP provide program comments on a category of undertakings, in lieu of conducting individual reviews of those undertakings under 36 CFR 800.3 - 800.7. An agency can meet its NHPA Section 106 responsibilities regarding the effects of a category of undertakings on historic properties by following the steps set forth by the ACHP in a program comment" (Program Comment Introduction, p. 5). "This proposed program comment provides the Army with an alternative means to comply with NHPA Section 306108 regarding the category of undertakings termed management actions for its inventory of pre-1919 housing, associated buildings and structures, and landscape features (pre-1919 housing)... Management actions for this housing are defined for the purposes of this program comment as: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, lease, transfer, and conveyance" (p. 5). "The proposed program comment applies to all of the Army's pre-1919 housing, associated buildings and structures, and landscape features, both privatized and Army-owned. The Army's best available information indicates there are 865 pre-1919 homes located on 18 installations in 14 states. Among these, there are 638 homes (74%) on 10 installations where pre-1919 housing has been designated as individual or contributing properties to NHL Districts" (Program Comment Section 4.0 Scope, p. 12). "The goal of the Program Comment is to provide the Army with National Historic Preservation Act (NHPA) 54 U.S.C. 306108 compliance for the repetitive management actions occurring on this large inventory of similar property types by means of the procedures in 36 CFR 800.14(e), in lieu of conducting individual projects reviews under 36 CFR 800.3 through 800.7."	General

#	NAME OF REVIEWING OFFICIAL	OFFICE SYMBOL	DATE	Stakeholder	COMMENT	Topic
37	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Protection of National Historic Landmarks - Historic Hawaii Foundation objects to the inclusion of contributing resources located in National Historic Landmark district in the Nationwide Program Comment. These properties have previously been identified through rigorous review to designate them as the Nation's most significant historic properties. The National Historic Preservation Act (NHPA) and associated preservation regulations and guidelines recognize that NHL properties must be afforded a higher level of protection. 36 CFR §800.10 Special requirements for protecting National Historic Landmarks. (a) Statutory requirement. Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking. Furthermore, each NHL has documented significance, characteristics and features unique to its location, place in history and status. The NHL program identifies historic and archaeological sites, buildings, and objects which "possess exceptional value as commemorating or illustrating the history of the United States" (NHPA Section 110 Guidelines). To co-mingle these exceptional properties into a pool of unrelated homes nationwide for the purpose of an expedited maintenance program is inappropriate, diminishes the importance of the NHL program, threatens the protection of our Nation's most significant properties and is contrary to stated National Policy for the protection of historic properties. In illustration of this point, the Army itself, in prior Program Comments for Army housing, specifically excluded NHL housing. Inter War Era Program Comment – Section 2.2.5 Applicability and Exclusions - "This Program Comment applies to all Army Inter-War Era housing, with the exception of Army Inter-War Era housing formally designated by the Department of the Interior, National Park Service (NPS) as an NHL or as a contributing property within an NHL. Section 110(f) of the NHPA requires that Federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs and, to the maximum extent possible, undertake such planning and actions as may be necessary. to minimize harm to NHLs. To exercise a higher standard of care for these NHLs, all Army Inter-War Era housing formally designated as an NHL, or housing formally designated as a NHL contributing property within a designated NHL District are not covered by this Program Comment (emphasis added).	NHLs
38	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Vietnam Era Housing Program Comment – Section 6.0 Applicability "The Army reviewed its National Historic Landmarks (NHL) documentation to confirm there are no Army Vietnam War Era housing designated as individual NHLs or as contributing properties to any NHL district. There are no known Army Vietnam War Era historic housing, associated buildings and structures, and landscape features that are NHLs, or that qualify for NHL designation."	General
39	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Palm Circle National Historic Landmark - Fort Shafter, Island of Oahu, Hawaii. In 2004, U.S. Army Garrison Hawaii adopted Guidance for the Palm Circle National Historic Landmark, stating that: "Due to the monumental historic significance of the National Historic Landmark of Palm Circle at Fort Shafter, Hawaii, it is necessary to provide more detailed specifications for the future maintenance and planning for the structures and other contributing elements within its boundaries. "Palm Circle is one of the few, if not the only, Edwardian villages to be constructed in a U.S. Territory. It is also one of the few remaining entities of its kind and has retained much of its historic fabric. "These traits, compounded with its significance to the fields of US history, military history, and architectural history, require that special considerations be given for the future plans of this national treasure. "The elements of Palm Circle, which include, but are not limited to, the arrangement of the structures, the open spaces, the landscape design, the plant taxon, the fountain, the form, materials and construction of each structure are all contributors to the weight and consequence of this historic site. "The preservation of the Palm Circle National Historic Landmark is crucial.... It is imperative that every effort be made to maintain this district for the legacy of the US Army in the Pacific and for the testimony it will serve for future generations." (emphasis added) See Programmatic Agreement, Military Housing Privatization Initiative Appendix E – U.S. Army Garrison, Hawaii, signed by Garrison Commander Colonel David L. Anderson, 30 March 2004.	NHLs
40	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Historic Hawaii Foundation concurred with the Army's official statement above and emphatically disagrees that the proposed program comment provides the recognition and protection for Palm Circle NHL that this statement requires. HHF recommends that the Palm Circle NHL be exempted from the Nationwide Program Comment.	NHLs
41	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Applicability - Currently, management actions for the 17 units of pre-1919 Army housing in Hawaii are subject to the Programmatic Agreement for the Privatization of Family Housing at US Army Garrison Hawaii (2004). During consultation on the Nationwide Program Comment, Army stated that there is no intention to amend or terminate existing Section 106 Agreement documents that apply to the subject properties, but that the Program Comment will "supersede" existing documents. HHF believes this framework will introduce confusion, competing processes and standards, and have the unintended consequence of making compliance actions more complicated, rather than the stated intention to streamline actions.	Applicability
42	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	The Palm Circle NHL District includes 15 Officers' Quarters, all of which are contributing buildings with similar designs, materials and occupants (all flag-level officers, including the Commanding General for U.S. Army Pacific). Of these, 14 units were constructed 1907-1909 and would be subject to the Program Comment for Pre-1919 Housing, while one was constructed in 1924 and would be presumably be subject to the Program Comment for Interwar-Era Housing. However, since the Interwar Era Housing Program Comment explicitly does not apply to NHLs, it also does not apply to Quarters 18. Therefore, the USAG-HI Programmatic Agreement for Military Housing Privatization Initiative would be the controlling agreement for Quarters 18. This means there will be two distinct Section 106 Agreement documents for the same historic district.	Applicability

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43	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Similarly, there are 240 units of historic housing located at Schofield Barracks and Wheeler Army Airfield. Of these, three were built in 1918 and would be subject to the Program Comment for Pre-1919 Housing; 227 were constructed between 1919 and 1940 and are subject to Program Comment for Interwar-Era Housing. However, another eight units were constructed in 1949 and two were built in 1957, which are not covered by either Program Comment and would remain subject to the USAG-HI Programmatic Agreement for Military Housing Privatization Initiative. That means there will be three separate Section 106 Agreement documents applicable to the same historic district.	Applicability
44	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	This is confusing enough for the housing units, but they at least have clear construction dates. It is extremely unclear how decisions for other features would be handled, especially landscapes with spatial relationships, vegetation, circulation patterns, small-scale features and archaeological resources. The first plans for Schofield Barracks were developed in 1912 and 1916. Construction of the housing areas began in 1916, paused during WWI and then resumed in 1918 with most of the housing area completed between 1919 and 1933.	Landscape and Features
45	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	With the period of construction spanning several eras, which National Program Comment applies to landscapes, archeological sites, vegetation and small scale features? The pre-1919, the Interwar Era or neither or both? Given the stated intention to make compliance actions more efficient and consistent, this situation seems to make compliance more complicated and confusing rather than less.	Landscape and Features
46	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Management Actions - Management actions are defined for the purposes of this program comment as: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, lease, transfer, and conveyance. (p.5). Army states that this program comment, unlike the three other Army program comments for historic housing, does not include adverse effect actions; demolition, cessation of maintenance, and new construction are excluded. HHF appreciates that the management actions are more appropriately confined to maintenance activities and do not include demolition, cessation of maintenance, and new construction. This more closely matches the intent of the program comment as defined in 36 CFR 800.14 as repetitive actions.	Management Actions
47	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	However, HHF does not agree that the management actions as defined above do not pose the potential of adverse effects to significant NHL properties. Aside from routine maintenance and repair actions, all other categories of action still have the potential to be adverse. HHF strongly recommends that the existing specific guidance developed for the Palm Circle National Historic Landmark, Schofield Barracks and Wheeler Army Airfield remain the appropriate standards and guiding documents for these historic properties.	Effect
48	Kiersten Faulkner, FAICP, Executive Director	HHF	11/22/2023	Historic Hawaii Foundation	Given these concerns, Historic Hawaii Foundation recommends that the Army's proposed Program Comment for Pre-1919 Housing exclude U.S. Army Garrison – Hawaii. We recommend that the Programmatic Agreement for the Privatization of Family Housing at US Army Garrison Hawaii (2004) remain the superseding agreement for the 17 units in Hawaii.	NHLs
49	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The National Trust for Historic Preservation ("National Trust") thanks the Army for this opportunity to comment on the Proposed Comment Plan for the Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, and Landscape Features ("Program Comment Plan"). We appreciate that the Program Comment Plan was developed in collaboration with staff from the Advisory Council on Historic Preservation ("ACHP"). We also note that it is less objectionable than previous Army Program Comments due to the exclusion of demolition, cessation of maintenance, and new construction from its scope. We hope the following comments will assist in the further refinement of the Program Comment Plan	General
50	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Proposed Program Comment Development Process is unreasonably rushed and does not allow for meaningful consultation. The Program Comment Plan proposes a Development Process that unreasonably limits the ability of the stakeholders and consulting parties to offer substantive comments. The Army first issued a public notice for this undertaking on October 23, 2023, and the Army proposes to submit the final Program Comment to the ACHP by January 31, 2024.1 This proposed timeline allows just over 90 days for the entire Section 106 consultation, with those 90 days including the Thanksgiving, Christmas, and New Years holidays, during which staff capacities are typically diminished. This timeline is insufficient for the Section 106 review of a Program Comment of this scope, especially since the vast majority of the 865 historic resources affected are within National Historic Landmark Districts and are legally entitled to heightened protection per Section 110(f) of the National Historic Preservation Act ("NHPA"), 54 U.S.C. § 306107.	PC Development Process
51	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The insufficiency of the proposed timeline is most notable in December, when four out of the six total consulting parties meetings are scheduled to be held. This proposed weekly pace of meetings, each addressing different, complex topics, does not allow enough time for the consulting parties to develop and submit meaningful written comments in between meetings. More importantly, it fails to allow time for any meaningful agency response to our comments, and creates the impression that the Army is merely going through the motions of consultation, with no intention of making any modifications whatsoever to its preconceived plans	PC Development Process
52	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	Dialogue with the consulting parties is especially important here, since the Program Comment proposes to replace multiple installation-specific agreement documents, which were developed through consensus with consulting parties. State Historic Preservation Officers ("SHPOs") and others who worked to develop those agreements deserve sufficient time to review and comment on the Army's proposed replacement of those custom-tailored and negotiated agreements with a nationwide one-size-fits-all plan. Affected SHPOs have already voiced concerns about the Program Comment during the comment and consultation process, and we ask that all stakeholders be afforded sufficient time to review and comment on each aspect of the Program Comment.	PC Development Process

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53	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The National Trust is concerned that, as currently scheduled, this consultation will essentially consist of the Army presenting voluminous information to the consulting parties in December, then the consulting parties submitting a wave of substantive comments to the Army in January. We fear that timeline will lead to numerous important issues remaining unresolved on January 31, 2024, when the Army plans to submit the final program comment to the ACHP. It would be unfortunate if substantial opposition to this Program Comment were to arise due to inadequate time to reach consensus on issues that should otherwise be resolvable. We encourage the Army to extend the timeline for the Program Comment Development Process to better facilitate participation by consulting parties and stakeholders in this Section 106 consultation and to avoid potentially resolvable opposition.	PC Development Process
54	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The consultation process fails to include cultural resource professionals from Army installations with pre-1919 housing. The Program Comment Plan establishes a selection procedure for the use of substitute and imitative materials. ² However, the Plan places no limitations at all on who will make the decisions about whether or not to use substitute materials and what to choose as an imitative replacement. In fact, Appendix B to the Plan suggests that the private housing partners themselves will implement the selection procedure, rather than Army staff. (p.40) The National Trust is concerned that these decisions will not be made or executed by individuals with any relevant professional qualifications, leading to poor decision-making and sub-optimal outcomes for both historic resources and the Army. Furthermore, the private housing partners, many of whom already have records of severe negligence with respect to maintenance of the historic properties, will be biased to make decisions based exclusively on the cheapest cost	Adequate professional training in historic preservation
55	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The selection procedure put forth in the Program Comment Plan could easily be improved by leveraging existing federal resources. Federal funding already pays for an expert historic preservation architect in each SHPO office, as well as Army cultural resource management staff at most of the affected installations, many of whom have historic preservation qualifications. Giving them a decisive role in the selection procedure outlined in the Program Comment Plan would likely result in better outcomes for both historic resources and for the Army. Their localized expertise and institutional knowledge are needed to ensure the effectiveness of this Program Comment.	Adequate professional training in historic preservation
56	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	For example, as illustrated in the Program Comment Plan, the historic homes included in the Army's pre-1919 inventory include a wide variety of architectural styles, and they are located in dramatically different geographic locations and climates, in 14 different states, ranging from Hawaii to Arizona to Upstate New York. ³ Those climate differences may have a significant impact on which replacement materials may be effective and appropriate, and the determinations need to be made locally, rather than on a nationwide basis. They also need to be made by historic preservation professionals, rather than by corporate housing managers whose primary motivation is maximizing profit. This level of consideration is required given that the majority of resources affected by the Program Comment are National Historic Landmarks and subject to the protections of Section 110(f) of the NHPA.	Adequate professional training in historic preservation
57	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	We recommend that the Selection Procedure be revised to include a requirement that both the SHPO and installation cultural resource management staff be involved in the implementation of the Selection Procedure prior to the replacement of historic building elements, especially if that decision impacts multiple historic resources. This extra step would not compromise the efficiency of the Program Comment; it would simply bring more federal assets to bear to help ensure its proper implementation and would incorporate existing institutional knowledge and expertise. This would also create a record of preservation decision-making and would likely encourage more careful deliberation during the selection procedure.	Adequate professional training in historic preservation
58	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	Meanwhile, it is also important to include the historic preservation professionals from the installations with pre-1919 homes as part of the Program Comment Development Process in the first place. Their knowledge and experience regarding the kinds of problems that arise and the kinds of alternative materials that would be appropriate is essential to ensuring that the program comment will be carefully tailored to address the necessary issues.	Adequate professional training in historic preservation
59	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	We oppose the inclusion of "lease, transfer, and conveyance" as management actions covered by the program comment. The Program Comment Plan states that "lease, transfer, and conveyance" will be treated as management actions whose likely effects are not adverse. ⁴ However, this assumption is inconsistent with the Section 106 regulations, which specifically require that, in order for the transfer, lease, or sale of federal property to avoid adverse effects, the transaction must include "adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance." 36 C.F.R. § 800.5(a)(2)(vii). No such restrictions would apply under the Program Comment Plan. As a result, for example, the Army could convey the pre-1919 homes at Fort McNair in Washington, DC, out of federal ownership, with no historic preservation requirements whatsoever, and the unrestricted conveyance would be exempted by the program comment from any Section 106 consultation.	Management actions: lease, transfer, and conveyance
60	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	In any event, more than 90% of the Army's pre-1919 historic homes are already the subject of existing ground leases that extend through 2055. ⁵ The proposed term of the program comment is calculated to coincide with that 2055 expiration date. Thus the inclusion of "lease, transfer, and conveyance" seems unnecessary, unless it is calculated to provide a mechanism for conveying those properties not already subject to private management agreements. However, the Program Comment Plan elsewhere states that the Army will use the program comment "in lieu of" any lease or conveyance documents, or development agreements. ⁶ This seems to call into question whether the Army intends to comply with its existing responsibilities under these ground lease agreements.	Management actions: lease, transfer, and conveyance
61	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The easiest way to resolve this issue would be to delete "lease, transfer, and conveyance" from the scope of management actions subject to the program comment. Another solution would be to add a requirement that "lease, transfer, and conveyance" transactions would only be covered by the program comment if the transactions include "adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance." Since lease, transfer, and conveyance transactions would presumably be rare in any event, the adequacy of those restrictions or conditions should be approved by the ACHP to ensure national consistency.	Management actions: lease, transfer, and conveyance

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62	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Army's estimate of the cost of compliance with historic reservation standards appears exaggerated. In the Program Comment Plan, the Army states, "[I]t is estimated that it will cost Army privatized housing partners an additional \$1.1 billion to \$1.7 billion through 2055 to meet historic preservation-related requirements driven by installation-level PAs and the Secretary's Standards and Guidelines." ⁷ This cost estimate, which equates to roughly \$35-\$54 million per year, lacks credibility, especially since it is solely for residential housing. The National Trust would like more documentation about the data behind this cost estimate, and we would like to work with the ACHP and the Army to help find better ways to control the costs of preservation for the Army. For example, since the Residential Communities Initiative program has now been in effect for more than a dozen years nationwide, compiling and disclosing the actual costs incurred for compliance with historic preservation requirements during that period would be useful data.	Estimated cost of compliance without a PC
63	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	Sharing the documentation and data behind these cost estimates could help to repair a significant lack of trust between the preservation community and the Army, which stems in part from the known disreputability of the Army's privatized housing partners. As you know, some of those privatized housing partners have committed criminal fraud and have been under investigation by Congress. ⁸ Fundamentally, the Army's privatized housing partners are for-profit businesses, in many cases multi-national corporations that have fiduciary duties to their shareholders that supersede their duties to our nation's soldiers and to our nation's history. The National Trust would like to work with the Army and the ACHP to ensure that these corporations are not misleading the Army and the public as to the actual cost of compliance with historic preservation standards. Sharing the data behind the Army's cost of compliance estimate would be an appropriate and productive way to begin that conversation.	Estimated cost of compliance without a PC
64	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Proposed Program Comment Plan fails to comply with the mandate under Section 110(f) of the NHPA to minimize harm to National Historic Landmarks to the maximum extent possible. The Program Comment Plan assumes that, because the proposed Program Comment would not include demolition, new construction, and cessation of maintenance, the Army is therefore minimizing harm to the maximum extent possible, as required by Section 110(f). ⁹ We strongly disagree. Just because the adverse effects could be worse does not mean that adverse effects are avoided or minimized. On the contrary, the proposed Program Comment would specifically authorize adverse effects to National Historic Landmarks by rubber-stamping alterations that are not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The proposed Program Comment also fails to require consideration of replacement-in-kind as a priority before resorting to alternative materials as a last resort. And the Program Comment would "replace" the historic preservation and maintenance requirements in existing Section 106 agreements ¹⁰ – which have been negotiated by consensus and tailored to the needs and characteristics of each specific site – and substitute instead a one-size-fits-all template that will allow alterations resulting in adverse effects. This will exacerbate harm to historic properties rather than minimizing harm	NHLS
65	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Army itself has explicitly acknowledged the potential adverse effects of its program comments on National Historic Landmarks by exempting NHLs from its Inter-War Era Program Comment for the very purpose of minimizing harm to those NHL properties and complying with Section 110(f). This Proposed Program Comment Plan makes no such effort and thus fails to comply with Section 110(f).	NHLS
66	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Program Comment Plan fails to include any meaningful mitigation for the adverse effects imposed on National Historic Landmarks. The Proposed Program Comment Plan states that "The Army will not implement any further historic property identification, evaluation, documentation in connection with pre-1919 housing and the management actions covered by the program comment. The pre-1919 housing is adequately identified, evaluated, and documented by existing mitigation documents . . ." ¹¹ Accordingly, more robust mitigation must be developed through consultation, which will be commensurate with the adverse effects that will result from the Program Comment.	NHLS
67	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	The Annual Report and Annual Meeting should not be limited to the Army and the ACHP. Section 10.0 of the Program Comment Plan proposes an annual report from the Army that would be provided exclusively to the ACHP, and an annual meeting that is exclusively between the Army and the ACHP, unless the ACHP requests the addition of "ACHP identified invitees." ¹² This is severely inadequate. At the very least, the distribution and invitation list for the annual report and annual meeting should include the National Park Service, National Conference of State Historic Preservation Officers, all SHPOs with pre-1919 Army homes within their states, and all other consulting parties who have submitted comments.	Annual Meeting
68	Elizabeth S. Merritt, Deputy General Counsel	NTHP	11/22/2023	National Trust for Historic Preservation	In sum, based on these comments, and the many others being submitted by SHPOs and consulting parties, substantial revision is going to be needed to the proposed Program Comment in order to address and resolve the many concerns, criticisms, and objections being raised in response to the Program Comment Plan. We urge the Army to pause the current fast-track process in an effort to revise the proposal in order to avoid a negative vote by the ACHP membership.	General

ATTACHMENT A

PROPOSED PROGRAM COMMENT FOR PRE-1919 ARMY HOUSING

Email Notifications

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From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA)
Sent: Monday, October 23, 2023 12:48 PM
To: Lisa.Jones@ahc.alabama.gov; judy.bittner@alaska.gov; kleonard@azstateparks.gov; scott.kaufman@arkansas.gov; julianne.polanco@parks.ca.gov; dawn.diprince@state.co.us; jonathan.kinney@ct.gov; suzanne.savery@delaware.gov; alissa.lotane@dos.myflorida.com; janet.gallimore@ishs.idaho.gov; dhpa@dnr.in.gov; Heather.Gibb@iowaeda.com; Patrick.Zollner@ks.gov; craig.potts@ky.gov; ksanders@crt.la.gov; kirk.mohney@maine.gov; elizabeth.hughes@maryland.gov; Brona.Simon@sec.state.ma.us; schumakerr1@michigan.gov; Alice.Roberts-Davis@state.mn.us; toni.prawl@dnr.mo.gov; pebrown@mt.gov; Jill.Dolberg@nebraska.gov; rlpalmer@shpo.nv.gov; Benjamin.wilson@dncr.nh.gov; jeff.pappas@state.nm.us; darin.waters@ncdcr.gov; billpeterson@nd.gov; dwelling@ohiohistory.org; anlowery@pa.gov; Jeffrey.Emidy@preservation.ri.gov; eemerson@scdah.sc.gov; Jenna.CarlsonDietmeier@state.sd.us; patrick.mcintyre@tn.gov; Mark.wolfe@thc.texas.gov; cmerritt@utah.gov; laura.trieschmann@vermont.gov; julie.langan@dhr.virginia.gov; allyson.brooks@dahp.wa.gov; daina.penkiunas@wisconsinhistory.org; sara.needles@wyo.gov; LeeAnne.Wofford@ahc.alabama.gov; katie.ringsmuth@alaska.gov; ralph.wilcox@arkansas.gov; jenan.saunders@parks.ca.gov; patrick.eidman@state.co.us; mary.dunne@ct.gov; gwen.davis@delaware.gov; angela.tomlinson@dos.myflorida.com; Jennifer.Dixon@DCA.GA.gov; alan.s.downer@hawaii.gov; tricia.canaday@ishs.idaho.gov; carey.mayer2@illinois.gov; BMCcord@dnr.IN.gov; katrina.ringler@ks.gov; nhmorris@crt.la.gov; christi.chapman-mitchell@maine.gov; anne.raines@maryland.gov; Elizabeth.Sherva@sec.state.ma.us; faesm@michigan.gov; amy.spong@state.mn.us; jwood@mdah.ms.gov; toni.prawl@dnr.mo.gov; khampton@mt.gov; Jill.Dolberg@nebraska.gov; rreed@shpo.nv.gov; nadine.miller@dncr.nh.gov; kate.marcopul@dep.nj.gov; michelle.ensey@state.nm.us; daniel.mackay@parks.ny.gov; ramona.bartos@ncdcr.gov; andrewclark@nd.gov; mpfister@ohiohistory.org; lynda.ozan@history.ok.gov; chrissy.curran@oregon.gov; amacdona@dpa.gov; emjohnson@scdah.sc.gov; Holly.M.Barnett@tn.gov; Elizabeth.brummett@thc.texas.gov; clhansen@utah.gov; stephanie.williams@dhr.virginia.gov; nicholas.vann@dahp.wa.gov; Susan.M.Pierce@wv.gov; amy.wyatt@wisconsinhistory.org; brian.beadles@wyo.gov; steve.callcott@dc.gov; david.maloney@dc.gov
Cc: rnelson (rnelson@achp.gov); Jaime Loichinger; Christopher Koeppel; Schmidt, Mary E CIV USARMY HQDA DCS G-9 (USA); Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA); Latiolais, Connie Lea CIV USARMY HQDA ASA IEE (USA); Connor, Mark Joseph CIV USARMY HQDA (USA); Wells, Gerald Shawn (Shawn) CIV USARMY HQDA ASA IEE (USA); Erik Hein
Subject: Proposed Program Comment for Pre-1919 Army Housing 1
Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf
Signed By: david.b.guldenzopf.civ@army.mil

Greetings State Historic Preservation Officers,

On 19 September 2023, the Department of the Army notified the Advisory Council on Historic Preservation 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).

I am reaching out to you to ensure you receive two important action items related to the proposed program comment: 1) The attached *Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation*, and 2) The Army's *Notice of Availability* (NOA) published in the Federal Register today, 23 October 2023,

at 88 FR 72743 inviting public comment on the Program Comment Plan. The Program Comment Plan is posted on the Army's program comment website <https://denix.osd.mil/army-pre1919-pchh/>, along with other information.

- *Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation:* You are invited to participate in a series of nationwide Section 106 consultation conferences for the Army's proposed Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features (Program Comment). The Army will host the consultation conferences for interested parties weekly on the Microsoft TEAMS platform. If you would like to participate in the Army's consultation conferences on the proposed program comment, please notify me via email by Nov 2, 2023, at david.b.guldenzopf.civ@army.mil. An interested parties list will be developed based on the responses received to this request. Going forward, future program comment communications from the Army FPO including electronic invitations to the weekly consultation conferences will be addressed to those on the interested parties list. Individuals may be added to the interested parties list anytime during the consultation period by email request to the Army FPO. As indicated in the attached invitation, the weekly virtual consultation conferences with interested parties will occur from 2:30-3:30 EST on Wednesday of each week as follows:

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If you have any questions, please do not hesitate to contact me.

David Guldenzopf, Ph.D.
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Learn more about Department of the Army historic preservation and cultural resources management by visiting www.denix.osd.mil/army-cr/home/

Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA)

From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA) <david.b.guldenzopf.civ@army.mil>
Sent: Monday, October 23, 2023 12:49 PM
To: dfrazier@astribe.com; pagarcia@aguacaliente.net; kreis@micmac-nsn.gov; thpo@badriver-nsn.gov; paulacarrick@baymills.org; thpo@brb-nsn.gov; d.gutierrez@bigpinepaiute.org; rmontez@big-valley.net; darren.delgado@bishoppaiute.org; jmflysdown@gmail.com; dholsapple@bluelakerancheria-nsn.gov; jaylen.strong@boisforte-nsn.gov; culture@bridgeportindiancolony.com; ivan@bvtribe.com; charisse.soucie@burnspaiute-nsn.gov; jrohler@mycaddonation.com; anthonymad2002@gmail.com; wenonah.haire@catawba.com; cultural@cit-nsn.gov; rsundberg@trinidadrancheria.com; elizabeth-toombs@cherokee.org; Mbear@cheyenneandarpaho-nsn.gov; stevev.crstpres@outlook.com; rep32jwb@gmail.com; kswalden@chitimacha.gov; ithompson@choctawnation.com; tracy.wind@potawatomi.org; jwagner@catribe-nsn.gov; betsitty@crit-nsn.gov; Martina.Minthorn@comanchenation.com; kathryn.mcdonald@cstk.org; kate_valdez@yakama.com; dpenn@chehalistribe.org; guy.moura@colvilletribes.com; ckrossman@ctclusi.org; THPO@grandronde.org; careymiller@ctuir.org; robert.brunoe@wstribe.org; bridgett-wheeler@coquilletribe.org; kponcho@coushatta.org; Mark.Durante@cowcreek-nsn.gov; rasgeirsson@cowlitz.org; cchistory@midstatesd.net; aaron.brien@crow-nsn.gov; klucas@delawarenation-nsn.gov; sbachor@delawaretribe.org; sherries@drycreekrancheria.com; chairman@duckwatertribe.org; syerka@nc-chokeokee.com; PBarton@estoo.net; elemomo10@gmail.com; lgreen@elk-valley.com; renokeoni@me.com; bmcquillen@gratonrancheria.com; garrie.killsahundred@fst.org; Evanschroeder@fdlrez.com; Benjamin.Rhodd@fcp-nsn.gov; mblackwolf@ftbelknap.org; falconkeeper22@gmail.com; d.youpee@fortpecktribes.net; barnaby.lewis@gric.nsn.us; thpo@grandportage.com; RGeary@hpultribe-nsn.gov; bill.quackenbush@ho-chunk.com; kelly.rosales@hohtribe-nsn.gov; hvt.thpo@gmail.com; skoyiyumptewa@hopi.nsn.us; thpo@hoplandtribe.com; istjohn@maliseets.com; mdawley@hualapai-nsn.gov; lfoster@lowas.org; ataylor@jamestowntribe.org; lcumper@jiv-nsn.gov; jflynn@jenachoctaw.org; janthpo@gmail.com; atobin@karuk.us; anthony@stewartspoint.org; Aconnor@kbic-nsn.gov; ahill@kiowatribe.org; james.trujillo@lajolla-nsn.gov; Brian.bisonette@lco-nsn.gov; sarah.thompson@ldftribe.com; alina.shively@lvd-nsn.gov; amy.burnette@llojibwe.net; mwiatorolik@ltbbodawa-nsn.gov; pattybasye@icloud.com; cheyanne.stjohn@lowersioux.com; LenaT@lummi-nsn.gov; makahthpo@gmail.com; lisahaws@msn.com; MEJohnson@mptn-nsn.gov; Lakota.hobia@gltnsn.gov; kmchenry@mechoopda-nsn.gov; dgrignon@mitw.org; holly@mathpo.org; THPO@MiamiNation.com; mlrivera@middletownrancheria.com; terry.kemper@millelacsband.com; moapathpo@moapabandofpaiutes.org; gina.mcgaughey@modocnation.com; jqinn@moheganmail.com; matthew.hatcher@mooretown.org; ABrierty@morongo-nsn.gov; thunt@muscoegenation.com; tashtesook@aol.com; valerie@nathpo.org; r.begay@navajo-nsn.gov; keithb@nezperce.org; tdelgado@nooksack-nsn.gov; benridgley007@gmail.com; teanna.limpy@cheyennation.com; douglas.taylor@nhbp-nsn.gov; j.pourier@oglala.org; dwight.howe@theomahatribe.com; oneida_thpo@oneidanation.org; thpo2@kake-nsn.gov; ahunter@osagenation-nsn.gov; ewhitehorn@omtribe.org; rhonda.oto@gmail.com; thpo@fpst.org; sgaughen@palatribe.com; Karl.Hoerig@pascuayaqui-nsn.gov; lbill@paskenta.org; soctomah@gmail.com; jreed@pawneenation.org; gary@pechanga-nsn.gov; chris.sockalexis@penobscotnation.org; hairey@chukchansi-nsn.gov; angelaj@pinoleville-nsn.gov; thpo@pitrivertribe.org; lhaikey@pci-nsn.gov; matthew.bussler@pokagonband-nsn.gov; liana.hesler@ponca-nsn.gov; tfoley@poncatribe-ne.org; pgst-thpo@pgst.nsn.us; raphaelwahwassuck@pbpnation.org; Noah.White@piic.org; sconcho@poamail.org; henryj@toast.net; ctoya@jemezueblo.org; rsmith@pol-nsn.gov; bbernstein@pojoaque.org; rortiz@sfpueblo.com; thpo@sanipueblo.org; Monica.Murrell@santaana-nsn.gov; bchavarria@santaclarapueblo.org; lsamuel@puebloftesuque.org; Francisco.Toribio@ziapueblo.org; kdongoske@gmail.com; thpo@plpt.nsn.us; ebandy@quapawnation.com; lfrenchman@quinault.org; marvin.defoe@redcliff-

To: nsn.gov; kade.ferris@redlakenation.org; meben@rsic.org; Kathy.Dowd@resighinirancheria.com; cmadrigal@rincon-nsn.gov; ione.quigley@rst-nsn.gov; prabano@rvit.org; director.historic@meskwaki-nsn.gov; mlhadden@sagchip.org; shane.anton@srpmic-nsn.gov; jferry@samishtribe.nsn.us; apachevern@yahoo.com; alexandra.mccleary@sanmanuel-nsn.gov; desireem@sanpasqualtribe.org; spowers@tachi-yokut-nsn.gov; nzavalla@santaynezchumash.org; larry.thomas@ohiycasino.com; christopher.chavez@kewa-nsn.us; kjoseph@sauk-suiattle.com; yahola.b@sno-nsn.gov; tinaosceola@semtribe.com; wtarrant@sctribe.com; joe.stahlman@sni.org; tonya@shawnee-tribe.com; svrthpo@sherwoodband.com; THPO@ssband.org; jmann@easternshoshone.org; dianned@swo-nsn.gov; shlanay1@Skokomish.org; jontiveros@soboba-nsn.gov; Michael.LaRonge@SCC-nsn.gov; xwatts@southernute-nsn.gov; thpo@spiritlakenation.com; randya@spokanetribe.com; rfoster@squaxin.us; darren.bonaparte@srmt-nsn.gov; j.eagle@standingrock.org; klyste@stillaguamish.com; thpo@mohican-nsn.gov; randi.loneeagle@summitlaketribe.org; strudel@suquamish.nsn.us; clamarr@SusanvilleIndianRancheria.onmicrosoft.com; jjefferson@swinomish.nsn.us; thpo@tttown.org; ademaray@mhanation.com; thpo@timbisha.com; peter.steere@tonation-nsn.gov; cynthia.ford@tolowa.com; earlii@tunica.org; Larus.Longie@tmbci.org; christopher.nicosia@29palmsbomi-nsn.gov; THPO@auburnrancheria.com; awatt@ukb-nsn.gov; SamanthaO@uppersiouxcommunity-nsn.gov; betsys@utetribe.com; tknight@utemountain.org; Linzey.scott4@gmail.com; THPO@wampanoagtribe-nsn.gov; thpo@washoetribe.us; Jaime.Arsenault@whiteearth-nsn.gov; MarkAltaha@wmat.us; gary.mcadams@wichtattribution.com; shutchason@wiltonrancheria-nsn.gov; sunshine.bear@winnebagotribe.com; ted@wiyot.us; sclemons@wyandotte-nation.org; yst.thpo@gmail.com; thpo@yochadehe.gov; lopezr@ydsp-nsn.gov; rclayburn@yuroktribe.nsn.us

Cc: rnelson; Jaime Loichinger; Christopher Koeppel; Schmidt, Mary E CIV USARMY HQDA DCS G-9 (USA); Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA); Latiolais, Connie Lea CIV USARMY HQDA ASA IEE (USA); Connor, Mark Joseph CIV USARMY HQDA (USA); Wells, Gerald Shawn (Shawn) CIV USARMY HQDA ASA IEE (USA); Valerie Grussing

Subject: Proposed Program Comment for Pre-1919 Army Housing 2

Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf

Signed By: david.b.guldenzopf.civ@army.mil

Greetings Tribal Historic Preservation Officers,

On 19 September 2023, the Department of the Army notified the Advisory Council on Historic Preservation 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).

I am reaching out to you to ensure you receive two important action items related to the proposed program comment: 1) The attached Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation, and 2) The Army's Notice of Availability (NOA) published in the Federal Register today, 23 October 2023, at 88 FR 72743 inviting public comment on the Program Comment Plan. The Program Comment Plan is posted on the Army's program comment website <https://denix.osd.mil/army-pre1919-pchh/>, along with other information.

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If you have any questions, please do not hesitate to contact me.

David Guldenzopf, Ph.D.
Director for Environmental Quality and
Army Federal Preservation Officer
Office of the Assistant Secretary of the Army for
Installations, Energy and Environment
110 Army Pentagon
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Washington, DC 20310-1001
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Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA)

From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA) <david.b.guldenzopf.civ@army.mil>
Sent: Monday, October 23, 2023 12:52 PM
To: ailaw001@hawaii.rr.com; couldnttakethemana@gmail.com; cdawson@dawson8a.com; AHCC.Nuhou@gmail.com; keolagrace@gmail.com; pjrcgo@gmail.com; guanson@me.com; hoohuli1@aol.com; aweau@aol.com; ohacompliance@oha.org; laurenm@oha.org; kamakanaf@oha.org; kaim@oha.org; kyle.kajihiro@gmail.com; lani@aukahi.com; tlenchanko1@hawaii.rr.com; ceo@hawaii.edu; benton.pang@gmail.com; jks0609@gmail.com; mililani.trask@icllchawaii.com; harrywasson@yahoo.com; ceo@koaike.com; kaim@oha.org
Cc: rnelson; Jaime Loichinger; Christopher Koeppel; Schmidt, Mary E CIV USARMY HQDA DCS G-9 (USA); Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA); Latiolais, Connie Lea CIV USARMY HQDA ASA IEE (USA); Connor, Mark Joseph CIV USARMY HQDA (USA); Wells, Gerald Shawn (Shawn) CIV USARMY HQDA ASA IEE (USA)
Subject: Proposed Program Comment for Pre-1919 Army Housing 3
Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf
Signed By: david.b.guldenzopf.civ@army.mil

Greetings Native Hawaiian Organizations,

On 19 September 2023, the Department of the Army notified the Advisory Council on Historic Preservation 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).

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Army Federal Preservation Officer
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Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA)

From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA) <david.b.guldenzopf.civ@army.mil>
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Subject: Proposed Program Comment for Pre-1919 Army Housing 4

Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf

Signed By: david.b.guldenzopf.civ@army.mil

Greetings Tribal Leaders,

On 19 September 2023, the Department of the Army notified the Advisory Council on Historic Preservation 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).

I am reaching out to you to ensure you receive two important action items related to the proposed program comment: 1) The attached *Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation*, and 2) The Army's *Notice of Availability* (NOA) published in the Federal Register today, 23 October 2023, at 88 FR 72743 inviting public comment on the Program Comment Plan. The Program Comment Plan is posted on the Army's program comment website <https://denix.osd.mil/army-pre1919-pchh/>, along with other information.

• *Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation*: You are invited to participate in a series of nationwide Section 106 consultation conferences for the Army's proposed Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features (Program Comment). The Army will host the consultation conferences for interested parties weekly on the Microsoft TEAMS platform. If you would like to participate in the Army's consultation conferences on the proposed program comment, please notify me via email by Nov 2, 2023, at david.b.guldenzopf.civ@army.mil. An

interested parties list will be developed based on the responses received to this request. Going forward, future program comment communications from the Army FPO including electronic invitations to the weekly consultation conferences will be addressed to those on the interested parties list. Individuals may be added to the interested parties list anytime during the consultation period by email request to the Army FPO. As indicated in the attached invitation, the weekly virtual consultation conferences with interested parties will occur from 2:30-3:30 EST on Wednesday of each week as follows:

Consultation Conference #1: 08 Nov 23 - Introduction, Goal, Objective, and Development
Consultation Conference #2: 15 Nov 23 - Scope, Pre-1919 Housing Inventory, NHL Status
Consultation Conference #3: 29 Nov 23 - Category of Undertaking and Potential Effects
Consultation Conference #4: 06 Dec 23 - Design Guidelines and Building Materials Catalog
Consultation Conference #5: 13 Dec 23 - Applicability, Effect, and Duration
Consultation Conference #6: 20 Dec 23 - Summary and Conclusion

• *Federal Register Notice of Availability*: Also attached is the Army's Federal Register NOA published on 23 October 2023 inviting public comment on the Program Comment Plan. The Program Comment Plan is posted on the Army's website <https://denix.osd.mil/army-pre1919-pchh/>. If you would like to submit written comments on the Program Comment Plan during the 30-day Federal Register public comment period, please follow the instructions in the Federal Register notice. The 30-day Federal Register public comment period ends on 22 November 23.

If you have any questions, please do not hesitate to contact me.

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Learn more about Department of the Army historic preservation and cultural resources management by visiting www.denix.osd.mil/army-cr/home/

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From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA) <david.b.guldenzopf.civ@army.mil>
Sent: Monday, October 23, 2023 1:25 PM
To: admin@onondagation.org; jshotton@omtribe.org; ronaldkirk1963@gmail.com; admin@guidiville.net; tribaladmin@upperlakepomo.com; tnuvangaoma@hopi.nsn.us; sjelliott@hoplandtribe.com; csabattis@maliseets.com; inaja_cosmit@hotmail.com; gretchen@ionemiwok.net; trhodd@iowas.org; rallen@jamestowntribe.org; juan.garzajr@ktttribe.org; KN@koination.com; info1@lptribe.net; jim.williams@lvd-nsn.gov; tribalchair@ltbbodawa-nsn.gov; loscoyotes@ymail.com; Chairman@lbst.org; jbarrett@potawatomi.org; cocotcsec@cocopah.com; council@cskt.org; dpigsley@msn.com; tribalcouncil@coquilletribe.org; administrator@coyotevalley-nsn.gov; frank.whiteclay@crow-nsn.gov; ashstep@nc-chokeberry.com; jstclair@easternshoshone.org; a.garcia@elemindiancolony.org; jgisler@elk-valley.com; info@enterpriserancheria.org; ceo@leaningrock.com; Anthony.Reider@fsst.org; jeffery.stiffarm@ftbelknap.org; carl@fortindependence.com; bburnette@ftmcdowell.org; TimothyWilliams@fortmojave.com; David.Arroyo@gtbindians.com; info@chickahominytribe.org; air530@yahoo.com; Shastamtrinc2@aol.com; fazure@fortpecktribes.net; wgravelle@baymills.org; vmoorehead@earthlink.net; lkipp@bsrnation.com; bgonzalez@mycaddonation.com; chairman@cahto.org; tribalcouncil@cahuilla.net; counciloffice@barona-nsn.gov; sharon.leroy@cayuganation-nsn.gov; nmunholand@cedarvillerancheria.com; aatkins@trinidadrancheria.com; rwassana@c-a-tribes.org; info@chitimacha.gov
Cc: rnelson; Jaime Loichinger; Christopher Koepfel; 'Schmidt, Mary E CIV USARMY HQDA DCS G-9 (USA)'; 'Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA)'; 'Latiolais, Connie Lea CIV USARMY HQDA ASA IEE (USA)'; 'Connor, Mark Joseph CIV USARMY HQDA (USA)'; 'Wells, Gerald Shawn (Shawn) CIV USARMY HQDA ASA IEE (USA)'
Subject: Proposed Program Comment for Pre-1919 Army Housing 4a
Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf
Signed By: david.b.guldenzopf.civ@army.mil

Greetings Tribal Leaders,

On 19 September 2023, the Department of the Army notified the Advisory Council on Historic Preservation 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).

I am reaching out to you to ensure you receive two important action items related to the proposed program comment: 1) The attached Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation, and 2) The Army's Notice of Availability (NOA) published in the Federal Register today, 23 October 2023, at 88 FR 72743 inviting public comment on the Program Comment Plan. The Program Comment Plan is posted on the Army's program comment website <https://denix.osd.mil/army-pre1919-pchh/>, along with other information.

- Invitation to the Department of the Army National Historic Preservation Act Section 106 Program Comment Consultation: You are invited to participate in a series of nationwide Section 106 consultation conferences for the Army's proposed Program Comment for Preservation of Pre-1919 Historic Army Housing, Associated Buildings and Structures, And Landscape Features (Program Comment). The Army will host the consultation conferences for interested parties weekly on the Microsoft TEAMS platform. If you would like to participate in the Army's consultation conferences on the proposed program comment, please notify me via email by Nov 2, 2023, at david.b.guldenzopf.civ@army.mil. An interested parties list will be developed based on the responses received to this request. Going forward, future program comment communications from the Army FPO including electronic invitations to the weekly consultation conferences will be addressed to those on the interested parties list. Individuals may be added to the interested parties list anytime

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If you have any questions, please do not hesitate to contact me.

David Guldenzopf, Ph.D.
Director for Environmental Quality and
Army Federal Preservation Officer
Office of the Assistant Secretary of the Army for
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110 Army Pentagon
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Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA)

From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA) <david.b.guldenzopf.civ@army.mil>
Sent: Monday, October 23, 2023 1:31 PM
To: amelendez@rsic.org; estauffer@rrcbc.nsn.gov; adminast.council@meskwaki-nsn.gov; Thjackson@sagchip.org; abero@srmt-nsn.gov; Gary.bohnee@srpmic-nsn.gov; trambler@scatui.net; dorris@sanpasqualtribe.org; srtribaloffice@aol.com; info@santaynezchumash.org; Chairman@semtribe.com; annette.krebsbach@shakopeedakota.org; tribalchairperson@ssband.org; adminoffice@shinnecock.org; Chairman@fpst.org; office@paskenta.org; kirk.francis@penobscotnation.org; chairman@pitrivertribe.org; ta@pitrivertribe.org; sbryan@pci-nsn.gov; rebecca.richards@pokagonband-nsn.gov; pvchairman@comcast.net; josephrupnick@pbpnation.org; Sbartell@piic.org; DavidJose@ramahnavajo.org; srecker@ramona-nsn.gov; timothy.greene@makah.com; RodneyButler@mptn.org; Brian.Weeden@mwtribe-nsn.gov; AnnMarie.Askew@mwtribe-nsn.gov; marlap@miccosukeetribe.com; beverlyt@miccosukeetribe.com; tc@middletownrancheria.com; gfrazier@mnchippewatribe.org; Chavers@boisforte-nsn.gov; kevindupuis@fdlrez.com; robertdeschampe@grandportage.com; Faron.Jackson@llojibwe.net; melanie.benjamin@millelacsband.com; Michael.Fairbanks@whiteearth-nsn.gov; info@choctaw.org; lwinner@mooretown.org; jaison.elkins@muckleshoot.nsn.us; adstanton@nitribe.org; frank.willie@nisqually-nsn.gov; ggover@nwbsshoshone.com; jamie.stuck@nhbp-nsn.gov; info@oneida-nation.org; shawn.davis@sv-nsn.gov
Cc: rnelson; Jaime Loichinger; Christopher Koeppel; Schmidt, Mary E CIV USARMY HQDA DCS G-9 (USA); Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA); Latiolais, Connie Lea CIV USARMY HQDA ASA IEE (USA); Connor, Mark Joseph CIV USARMY HQDA (USA); Wells, Gerald Shawn (Shawn) CIV USARMY HQDA ASA IEE (USA)
Subject: Proposed Program Comment for Pre-1919 Army Housing 4b
Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf
Signed By: david.b.guldenzopf.civ@army.mil

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Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA)

From: GULDENZOPF, David B CIV USARMY HQDA ASA IEE (USA) <david.b.guldenzopf.civ@army.mil>
Sent: Monday, October 23, 2023 12:55 PM
To: Betsy Merritt; Erik Hein; Valerie Grussing; Kiersten@historichawaii.org
Cc: rnelson; Jaime Loichinger; Christopher Koepfel; Schmidt, Mary E CIV USARMY HQDA DCS G-9 (USA); Johnston, Lisa C CTR USARMY HQDA ASA IEE (USA); Latiolais, Connie Lea CIV USARMY HQDA ASA IEE (USA); Connor, Mark Joseph CIV USARMY HQDA (USA); Wells, Gerald Shawn (Shawn) CIV USARMY HQDA ASA IEE (USA)
Subject: Proposed Program Comment for Pre-1919 Army Housing 5
Attachments: Invitation to Army Program Comment Section 106 Consultation.pdf; Federal Register NOA Program Comment Plan 10232023.pdf
Signed By: david.b.guldenzopf.civ@army.mil

Greetings Historic Preservation Advocacy Organizations,

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ATTACHMENT B

PROPOSED PROGRAM COMMENT FOR PRE-1919 ARMY HOUSING

Program Comment Consultation Summary

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Consultation Summary 12.20.2023 6

Consultation Meeting #1 11.8.2023 Summary

Consultation Materials Provided on the Program Comment Website

<https://www.denix.osd.mil/army-pre1919-pchh/>

Invitees: Army FPO provided individual email invitations to each of the consulting parties.

Attendees:

Organization	Number of Attendees
ACHP	1
Army	5
NCPC	2
NGO (3 organizations)	5
Historic HI Foundation	2
NCSHPO	1
NTHP	2
SHPO (12 organizations)	18
Alabama SHPO	2
Alaska SHPO	1
Arizona SHPO	2
Colorado SHPO	1
Iowa SHPO	1
Kansas SHPO	2
Michigan SHPO	1
Minnesota SHPO	1
Oklahoma SHPO	1
Texas SHPO	3
Washington SHPO	1
New Jersey SHPO	2
Grand Total (18 organizations)	31

Topics: Background, Introduction, Goal, Objective, Summary, Intent, Development Process, Outreach

Consultation Meeting #2 11.15.2023 Summary

Consultation Materials Provided on the Program Comment Website

<https://www.denix.osd.mil/army-pre1919-pchh/>

Invitees: Army FPO provided individual email invitations to each of the consulting parties.

Organization	Number of Attendees
ACHP	1
OSD	1
Army	4
NCPC	2
NGO (3 Organizations)	5
Historic HI Foundation	2
NCSHPO	1
NTHP	2
SHPO (10 Organizations)	16
Colorado SHPO	1
Hawaii SHPO	2
Iowa SHPO	1
Kansas SHPO	2
Michigan SHPO	1
Minnesota SHPO	1
OK SHPO	1
Texas SHPO	4
Hawaii SHPO	1
New Jersey SHPO	2
Total (17 Organizations)	29

Topics: Program Comment Scope, Pre-1919 Housing Inventory, National Historic Landmark Status

Consultation Meeting #3 12.1.2023 Summary

Consultation Materials Provided on the Program Comment Website

<https://www.denix.osd.mil/army-pre1919-pchh/>

Invitees: Army FPO provided individual email invitations to each of the consulting parties.

Attendees:

Organization	Number of Attendees
ACHP	1
Army	5
NCPC	1
NGO (4 Organizations)	6
Historic HI Foundation	2
NATHPO	1
NCSHPO	1
NTHP	2
NPS	1
OSD	1
SHPO (11 Organizations)	13
Arizona SHPO	2
Colorado SHPO	1
Georgia SHPO	1
Hawaii SHPO	1
Kansas SHPO	1
Maryland SHPO	1
Michigan SHPO	1
Oklahoma SHPO	1
Texas SHPO	2
Washington SHPO	1
New Jersey SHPO	1
THPO	1
Flandreau Santee Sioux Tribe	1
Grand Total (22 Organizations)	29

Topics: Category of Undertaking, Likely Effects

Consultation Meeting #4 12.6.2023 Summary

Consultation Materials Provided on the Program Comment Website

<https://www.denix.osd.mil/army-pre1919-pchh/>

Invitees: Army FPO provided individual email invitations to each of the consulting parties.

Attendees:

Organization	Number of Attendees
ACHP	1
Army	4
NCPC	1
NGO (3 Organizations)	5
Historic HI Foundation	2
NCSHPO	1
NTHP	2
NPS	2
OSD	1
SHPO (8 Organizations)	13
Arizona SHPO	1
Georgia SHPO	2
Kansas SHPO	2
Maryland SHPO	1
Michigan SHPO	1
Oklahoma SHPO	1
Texas SHPO	4
New Jersey SHPO	1
Grand Total (16 Organizations)	27

Topics: Program Comment Approach and Methodology

Consultation Meeting #5 12.13.2023 Summary

Consultation Materials Provided on the Program Comment Website

<https://www.denix.osd.mil/army-pre1919-pchh/>

Invitees: Army FPO provided individual email invitations to each of the consulting parties.

Attendees:

Organizations	Number of Attendees
ACHP	1
Army	5
NCPC	1
NGO (4 organizations)	6
Historic HI Foundation	2
NATHPO	1
NCSHPO	1
NTHP	2
NPS	1
OSD	1
SHPO (9 states)	16
Arizona SHPO	1
Georgia SHPO	2
Hawaii SHPO	3
Kansas SHPO	2
Maryland SHPO	1
Michigan SHPO	1
Oklahoma SHPO	1
Texas SHPO	4
New Jersey SHPO	1
Grand Total (18 Organizations)	31

Topics: Pre-1919 Historic Housing Costs, Implementation, Applicability, Effect and Duration

Consultation Meeting #6 12.20.2023 Summary

Consultation Materials Provided on the Program Comment Website

<https://www.denix.osd.mil/army-pre1919-pchh/>

Invitees: Army FPO provided individual email invitations to each of the consulting parties.

Attendees:

Organization	Number of Attendees
ACHP	1
Army	4
NCPD	1
NGO (3 Organizations)	4
Historic HI Foundation	1
NCSHPO	1
NTHP	2
NPS	2
OSD	1
SHPO (8 organizations)	11
Arizona SHPO	1
Hawaii SHPO	1
Kansas SHPO	1
Maryland SHPO	1
Michigan SHPO	1
Oklahoma SHPO	1
Texas SHPO	4
New Jersey SHPO	1
THPO	1
Forest County Potawatomi	1
Grand Total (17 Organizations)	25

Topics: Program Comment Plan - Summary and Conclusion