



2024 ANNUAL REPORT

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

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Submitted to:

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I. Introduction

The National Historic Preservation Act (NHPA) Section 106 requires federal agencies to consider the effects of their projects on historic properties and provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. The ACHP has established regulations (36 CFR 800) that outline the process for federal agencies to comply with NHPA Section 106. Under 36 CFR 800.14(e), federal agencies can request the ACHP to provide *program comments* on a category of undertakings, rather than conducting individual reviews.

The ACHP's program comment guidance states that the primary benefit of program comments is that they allow federal agencies to comply with NHPA Section 106 in a tailored and consistent manner for a class of undertakings, rather than addressing each undertaking individually. This is particularly useful for the Army, given the magnitude of its historic housing inventory and the numerous repetitive undertakings required to repair, maintain, and improve this large inventory. The Program Comment provides the Army with an alternative means to comply with NHPA Section 106 regarding management actions for its pre-1919 housing, associated buildings and structures, and landscape features.

The need for this Program Comment for Pre-1919 Army housing was driven by the Army's obligation to provide safe, healthy, and quality housing to soldiers and their families, as well as the unique challenges of managing NHPA Section 106 compliance for its large inventory of historic housing. In 2019, the Secretary of the Army declared an Army Housing Crisis due to widespread deficiencies and significant quality of life, health, and safety issues affecting military families living in historic Army housing. These issues led to an investigation by the Army Inspector General and continue to receive high-level attention from Congress, senior military officials, and military family members residing in historic Army homes.

To address these issues, the Army is implementing specific management actions to improve pre-1919 housing conditions, including improving the quality of life for soldiers and their families, addressing health and safety risks from hazardous materials, ensuring cost-efficient and effective management, and using climate-resilient and energy-efficient building materials. The Army's Program Comment has also streamlined the NHPA Section 106 compliance process for projects that improve and preserve pre-1919 housing, reducing the impact on military families waiting to occupy the housing.

Housing and living conditions are critical factors for military families, given the challenges and stressors they face in their daily lives. The Government Accountability Office has found a direct connection between poor housing conditions and military readiness, with concerns about poor housing conditions affecting service members' ability to focus on the military mission. Some service members are leaving the military due to poor housing conditions, and the issue is also impacting recruitment.

For pre-1919 housing, the Army must abate hazardous materials such as lead-based paint and asbestos, implement improvements and additions to modernize living spaces, and provide kitchen and bathroom upgrades. The Army must also implement climate change adaptations using climate-resilient and energy-efficient building materials, as well as other energy efficiency measures. Additionally, the Army must modernize heating, cooling, and ventilation systems, plumbing and electrical systems, and install modern life safety and protective elements such as fire suppression systems and force protection features.

The Army also needs to lease, transfer, or convey pre-1919 housing to facilitate housing operations by its privatized housing partners under the Residential Communities Initiative (RCI). RCI operates under Army authority on Army installations nationwide through partnerships between the Army and private sector real property managers. Lease, transfer, and conveyance under this Program Comment are limited to the transfer of pre-1919 housing to and between RCI partners, and between RCI partners and the Army, solely for the purposes of and use as military housing and associated purposes that support military housing operations.

Addressing NHPA Section 106 compliance requirements for the repetitive management actions occurring on this large inventory of pre-1919 housing presents unique and significant challenges for the Army that are being met through implementation of this program comment.

The 2024 Annual Report

The 2024 Annual Report is submitted in fulfillment of the Program Comment. The 2024 Program Comment reporting period runs from April 2024 through 31 December 2024. This Annual Report summarizes actions undertaken by the Army in 2024 in the implementation of the Program Comment. These actions include treatment measures specified in the Program Comment.

The category of undertaking for the Program Comment is *management actions*. *Management actions* are defined for the purposes of this Program Comment as maintenance, repair, rehabilitation, abatement of hazardous materials, mothballing, lease, transfer, and conveyance. The Program Comment is consistent with and implements the *Secretary's Standards for Rehabilitation* at 36 CFR 68.3(b). The *Design Guidelines for Pre-1919 Army Housing* and the *Building Materials Guidelines and Catalog for Pre-1919 Army Housing* appended to this Program Comment are applicable guidelines. This Program Comment will maintain the integrity of pre-1919 housing and historic district location, design, setting, materials, workmanship, feeling, and association consistent with the *Secretary's Standards*. Therefore, when implemented following its substantive and procedural requirements, this Program Comment and the effects of those *management actions* on pre-1919 Army housing are not adverse.

II. Design Guidelines and Building Materials Catalog

The Army or RCI partner where housing is privatized will plan for the selection and use of appropriate building materials in the repair and rehabilitation of pre-1919 Army housing. Specific building material step by step selection procedures are established in section 8 of this Program Comment that consider the need to maintain the historic and architectural character of pre-1919 housing in a balanced priority with cost, climate resiliency, materials durability, and the health, safety, and quality of life considerations for military families living in pre-1919 housing. To further ensure that proper planning for and use of appropriate building materials occurs, this Program Comment also provides for support from qualified historic preservation professionals and includes two preservation planning documents: *Design Guidelines for Pre-1919 Army Housing* and *Building Materials Guidelines and Catalog for Pre-1919 Army Housing* incorporated as Appendices A and B, respectively.

The *Design Guidelines for Pre-1919 Army Housing* in Appendix A provide specific information regarding pre-1919 housing architectural styles and identify character-defining features and design elements associated with the pre-1919 architectural styles. Character-defining features include the overall shape, style, and design of the building, decorative details, interior spaces and features, as well as its associated buildings and structures, and landscape features. The *Design Guidelines for Pre-1919 Army Housing* include detailed guidance for rehabilitation and features such as windows and doors, entrances, porches, roofs, foundations and walls, interiors, interior structural systems, historic designed landscapes and features, historic districts, circulation systems, associated buildings and structures, as well as guidance on mothballing of housing, emergency repairs and disasters, and actions related to military force protection requirements.

The Building Materials Guidelines and Catalog for Pre-1919 Army Housing in Appendix B is used in concert with the Design Guidelines for Pre-1919 Army Housing. The Building Materials Guidelines and Catalog provides additional specificity on building materials and their use. The Building Materials Guidelines and Catalog provides information to assist in selecting the appropriate building materials that maintain the historic and architectural character of the housing and meet cost and technical feasibility requirements of the Secretary's Standards. Catalog entries are provided for major components of pre-1919 housing design. Design considerations for each catalog entry are derived from the design fundamentals of scale, mass, proportion, and materials. This provides the guidance for selection of appropriate materials and component designs that factor location, type, size, finish and maintenance into their selection. Focus is on appropriate design, applicable materials, and performance characteristics with emphasis on retention of overall housing design integrity.

The *Building Materials Guidelines and Catalog* includes *in-kind*, and *substitute building materials*. A range of modern *substitute building materials* are included for considerations related to economic feasibility and technical feasibility such as material durability, energy efficiency, and climate resiliency. Cost and durability are factors relevant for example to the selection of in-kind wood windows or windows made of substitute materials such as vinyl. As stated in National Park Service Preservation Brief 16, the poor quality of available commercial supplies of lumber no longer provides the denser, more decay-resistant wood of old-growth forests. Due to the poor quality of available lumber used in the manufacture of in-kind wood windows, modern vinyl windows are as or more durable than today's in-kind wood windows. This is made clear by the manufacturer warranty periods provided for vinyl windows which are as long or longer than the manufacturer warranties for in-kind wood windows. Vinyl windows can also provide an adequate visual replication of the historic windows, cost significantly less than in-kind wood windows, have a shorter turn-around time for manufacture and installation, improve energy efficiency, and have lower long-term maintenance requirements.

As stated in National Park Service Preservation Brief 16, when a *substitute building material* is used for replacement, a loss in integrity can sometimes, although not always, occur. That situation is mitigated by the fact that *substitute building materials* are *reversible* and can be replaced with *in-kind materials* at any point in time. Additionally, the support of qualified historic preservation professionals in the building materials selection process and monitoring of *management actions* by the Army FPO will ensure that the historic character of pre-1919 housing and historic districts is maintained.

III. Examples of 2024 Technical Support Provided for Application of the Program Comment

Site Specific Summary of 2024 of Technical Support:

The Program Comment criteria for building materials selection are: When health and safety of military families is of concern, or when the initial or on-going use of historic building materials and in-kind building materials impacts the Army's ability to fully implement quality of life improvements to housing for military families, imitative substitute building materials will be considered for use only in a manner that maintains the historic and architectural character of the historic housing and when consistent with the results of the following building materials selection procedure.

Site visits to pre-1919 Era installations were undertaken in 2024 and will continue into 2025. The purpose of the site visits was to provide an overview of the Program Comment; guidance in the application of Design Guidelines, Building Materials Catalog, and reporting requirements; and technical support related to proposed projects. Army private housing partners manage the historic housing on the majority of

installations. Goodwin provided an overview of the Pre-1919 Era Program Comment at each meeting with the RCI partner.

The following provides additional details from several installation site assistance visits during the reporting period with important information bearing on the annual report.

Presidio of Monterey, California

Goodwin & Associates (Goodwin) overviewed the pre-1919 housing Program Comment. All pre-1919 units were renovated prior to the program comment. Renovation included new roofs, replacement of rotting siding, addition of screen doors, window screens, handrails, and wood skirting along the foundation, updated switches and outlets, standardized garage doors, and replacing foundation posts when required. Houses were regraded at the foundation level when necessary. Each unit's renovation cost approximately \$250,000. Circa 2017, all pre-1919 units were repainted. Current efforts on pre-1919 housing include updating furnaces and interior light fixtures, and replacing broken glass where required in windows as needed. A second meeting regarding the installation occurred on November 10th, 2024. The proposed plans for the pre-1919 houses were moving forward. He stated that designs and specs will be submitted as they become available.

Carlisle Barracks, Pennsylvania

A brief overview of the pre-1919 housing Program Comment was given, and the pre-1919 housing Program Comment and reporting requirements were reviewed. The installation detailed the funding process and priorities. Projects are identified and prioritized in five-year cycles.

The current projects fall under the current planning cycle, with planning for the next five-year cycle starting shortly. The RCI partner summarized the upcoming plans for pre-1919 housing provided a tour of the Army housing. Future site visits and zoom calls were planned.

Carlisle Barracks has plans for several of the pre-1919 units located on the installation. The kitchen and bathrooms are planned to be remodeled at the Coren Apartments, which includes one building housing five units. The update currently is planned and awaiting final pricing. It is anticipated that funding for this project will be requested in FY 2025. Modifications to the kitchen and bathrooms at the Wilson House, which is a one-unit dwelling, also are planned. Roof replacement is planned for the Lovell Apartments, which includes four units in two buildings, and the School Road Apartments, which includes three units in two buildings. There was a brief discussion about the National Park Service (NPS) work taking place on post and one of the School Road buildings (referred to as the Pop Warner house) the NPS is interested in leasing. The Pop Warner house is in the middle of rehabilitation, which started under the Section 106 process. The sister dwelling currently is vacant with no work planned for the foreseeable future.

The second meeting with the installation occurred on November 18th, 2024. Carlisle Barracks stated that the Lovell Apartments roof replacement effort is the one project moving forward. The status of the Pop Warner (School Road) house remains the same as in Sept. 2024. All work consists of protecting the assets; projects such as installing upgraded HVAC will move forward. No issues, concerns, or problems with implementing the Program Comment.

USAG Hawaii, Hawaii

The majority of the pre-1919 units are located on Fort Shafter's Palm Circle. These units are renovated to the preferences of commanding officers every two years when new tenants arrive. The following table describes the status of the units currently being renovated.

Unit Number	Work
3	Currently fenced-in as bidding process occurs
5	Working on MDM, structural changes necessary to accommodate GO needs and QoL
9	Renovation beginning
10	Renovation finished, commanding officer moving in
18	Renovation being finished

Other pre-1919 units include General’s Loop on Schofield Barracks. Three units of pre-1919 housing are located in General’s Loop.

The second meeting regarding USAG HI occurred on November 25, 2024. Construction continues for the residences at Palm Circle as planned.



Palm Circle Qtrs. 18 completion

Fort Detrick, Maryland

Balfour Beatty, the private housing partner, is conveying the Nallin Farm property back to the Army. The Nallin Farm property is the only pre-1919 site at Fort Detrick, and is composed of the Nallin farmhouse, a former tenant dwelling that was used as a sergeant major’s quarters, a garage, and a prefabricated shed. The Nallin House has been vacant since 2016 but has been maintained and kept climate-controlled by Balfour Beatty. Rehabilitation of the house for residential occupation would require replacing the kitchen and bathrooms and repairing water damage to interior plaster caused by a former roof leak. The roof and the heating boiler have been repaired, and the porches are in the process of being repaired.

Fort Bliss, Texas

There are 39 units of pre-1919 housing at Fort Bliss. Currently, no work is anticipated for these buildings. Roofing repairs were undertaken in 2023 due to a weather-related insurance claim. As of November 25, 2024, there are no further proposed projects on this housing.



Pre-1919 Era Residence at Fort Bliss (Goodwin 2024)

Fort Hamilton, New York

Following Goodwin staff visit in October 2024 to West Point, where Mr. Beauregard is also a point of contact, he requested Goodwin to visit Fort Hamilton to discuss potential uses for the six pre-1919 housing units. These six housing units are connected as one building. The two outer units, more desirable for their added light, are occupied while the four central units are vacant. The housing partner had entertained using the housing units as storage, community spaces, or both once new in-progress housing units are completed. Goodwin discussed how the Program Comment can be utilized for rehabilitation management actions. Internal discussions among the housing partner team suggested the current units are underutilized due to higher ranks occupying the outer units. Once those ranking residents are relocated to the new housing units, the pre-1919 units likely can be reused as housing. They discussed the possibility of modifying floorplans to provide more storage and closet spaces in bedrooms. Internal modifications as a management action were discussed in accordance with the Program Comment.

Fort Huachuca, Arizona

Goodwin discussed the previous Programmatic Agreement (PA) at Fort Huachuca and how the new Program Comment operates and replaces the PA. A second meeting discussed pre-1919 housing at the installation on November 22nd, 2024. The Michaels Organization indicated they will share plans with the consultants to ensure the scope of planned renovations meets the Program Comment.

Fort Leavenworth, Kansas

Goodwin staff met with The Michaels Organization to discuss the Pre-1919 Era Family Housing Program Comment. Fort Leavenworth has a large stock of pre-1919 housing and is a National Historic Landmark. The meeting was divided into introductions, ongoing and upcoming projects, and implementation of the Program Comment. The latter included site visits to three pre-1919 properties with early or planned porch restoration projects as well as a visit to the housing partner maintenance facility to review imitative materials.

Goodwin provided an overview of the new Program Comment and particularly discussed the importance of the decision-making process for Fort Leavenworth's pre-1919 housing stock. Both teams visited three pre-1919 housing units so The Michaels Organization could discuss the restoration of exterior porches. Their plans include utilizing imitative substitute materials of the same size and scale to renovate all porch units per building for consistency (i.e., do both unit porches for a duplex versus solely the one in worse condition). The Michaels Organization also brought Goodwin to their maintenance building to review their imitative materials and meet their historic carpenter.

As of December 18, 2024, Fort Leavenworth may spend up to \$89.7 million over the next five years to rehabilitate 171 of the post's 269 historic homes, including the Rookery, the oldest continuously occupied home in Kansas.



Pre-1919 Residence at Fort Leavenworth (Goodwin 2024)

Fort Moore, Georgia

There is one pre-1919 housing unit at Fort Moore, called Riverside. The building last was renovated in 2020. Eight of the windows on the building have been replaced, and the remaining windows will be replaced in 2026 when the commanding officer leaves Riverside. No further work is planned for Riverside as of November 25, 2024.

Fort Riley, Kansas

RCI partner provided Goodwin with a package of upcoming management requests for pre-1919 housing, which primarily are plumbing or HVAC-related. Flores had one question about the Pre-1919 Era Program Comment: whether temporary fencing is covered. As of the second meeting to discuss pre-1919 housing on November 22nd, 2024, there are no major changes planned. The installation is currently seeking funding for interior and exterior painting.

Fort Sill, Oklahoma

Corvias is planning to replace their Geothermal units at their pre-1919 houses and some of their Inter-War houses. The Geothermal units will be in-kind replacements. No other large scale, upcoming projects were identified during the discussion.



Pre-1919 Residence at Fort Riley (Goodwin 2024)

Joint Base San Antonio, Texas

Goodwin provided an overview of the Pre-1919 Era Program Comment with the RCI partner. The partner asked how the new pre-1919 program comment differs from the Inter-War Program Comment which they are familiar with implementing. Goodwin advised that the Program Comments are similar in approach and scope; however, the Pre-1919 Era Program Comment does not include demolition.

A second meeting occurred on November 21, 2024. The Program Comment presentation briefing was provided for additional staff. The housing partner's five-year development plan includes replacement of windows, new HVAC, partial roof replacements, window locks, chimney cap repairs, basement door replacement, and new exhaust fans.

Picatinny Arsenal, New Jersey

Picatinny Arsenal plans to work on Farley Homes, their pre-1919 housing neighborhood. The planned work will include bathroom renovations, HVAC improvements and replacements, window replacement and trim rot repair, and select chimney repairs. One building, 108 Farley, will become the new community center for Balfour Beaty.

A second meeting to discuss pre-1919 housing occurred on November 18th, 2024. Intended plans detailed in the initial meeting are scaled back due to funding. Window and exterior trim replacement remains possible. HVAC/roof replacement also will occur.

Rock Island Arsenal, Illinois

Many windows on site have flaking paint and chips. The RCI partner stated that if the piece of window was more than fifty percent deteriorated he advises for that portion to be replaced.



Pre-1919 Housing at Rock Island Arsenal (Goodwin 2024)

West Point, New York

West Point was presented with the Pre-1919 Era Program Comment briefing. Quarters 102 features chimney pots that are failing. West Point compared the time and price of in-kind custom replacements or imitative substitute chimney pots with a similar profile to the historic. The price and wait time for the in-kind chimney pots was significantly less than custom units. The wait time was an important consideration due to water penetration. West Point chose the imitative substitute chimney pots, as pictured below.



Replacement imitative substitute chimney pots on Quarters 102 (West Point 2024)

Examples of 2024 Actions

Table 1 provides several representative examples of actions taken to maintain pre-1919 Era housing in 2024 pursuant to the Program Comment. It is noted that both in-kind and imitative substitute building materials are being used to replace highly damaged and deteriorated historic materials.

Table 1

Installation	Action	Number of Units
USAG Hawaii, HI	Fireplace Restoration	1
Rock Island Arsenal, IL	Brick repointing	1
USAG Hawaii, HI	Palm 18 complete renovation	1
Fort Leavenworth, KS	Porch repairs and replacement	10
Fort Sill, OK	Roof replacement	34

IV. Summary Review

There have been no major or significant issues or misunderstandings that have arisen in the course of applying the Program Comment during the 2024 reporting period. Regarding the overall effectiveness of the Program Comment, Army commands, installations, and housing privatization partners indicate this Program Comment is fully meeting its intent and purpose and will continue to successfully balance historic preservation requirements with the well-being of the thousands of military families who live in this historic housing.

In the coming year, it is expected that a number of management actions involving the repair or replacement of building materials will be required for pre-1919 housing at multiple locations. The building materials

selection criteria and procedures will be followed for each action. The Army is confident that implementation of ongoing Program Comment training program, and sustained professional assistance, technical support, oversight, and monitoring will ensure that the historic and architectural character of the housing is maintained while implementing actions under the Program Comment that improve the quality of life and overall material living conditions of Army military families.

Implementation of the Program Comment is proceeding well and meeting the goal and objective of the document. No problems have been encountered and no amendments to the Program Comment are required.