



## **2025 ANNUAL REPORT**

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

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## TABLE OF CONTENTS

<b>INTRODUCTION.....</b>	<b>1</b>
<b>1.0 The 2025 Annual Report .....</b>	<b>3</b>
<b>2.0 Design Guidelines and Building Materials Catalog.....</b>	<b>4</b>
<b>3.0 Examples of 2025 Technical Support Provided for Application of Building Materials Selection Criteria and Procedures.....</b>	<b>5</b>
3.1 Site Specific Summary of 2025 of Technical Support for Application of Building Materials Selection Criteria and Procedures.....	6
Presidio of Monterey, California .....	6
Carlisle Barracks, Pennsylvania.....	7
USAG Hawaii, Hawaii .....	7
Fort Bliss, Texas .....	8
Fort Leavenworth, Kansas .....	9
Fort Benning, Georgia .....	11
Fort Riley, Kansas.....	11
Fort Sam Houston .....	12
Fort Sill, Oklahoma.....	12
West Point, New York .....	13
Fort Huachuca .....	14
3.2 Examples of 2025 Actions .....	15
<b>4.0 Summary Review .....</b>	<b>15</b>

## INTRODUCTION

NHPA Section 106 requires federal agencies to take into account the effects of projects they carry out, license, or assist (i.e., undertakings) on historic properties, and to provide the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings. The ACHP has issued regulations codified under 36 CFR 800 that set forth the process through which federal agencies comply with the requirements of NHPA Section 106. Under 36 CFR 800.14(e), federal agencies can request the ACHP to provide comments on a category of undertakings, in lieu of conducting individual reviews of those undertakings under 36 CFR 800.4 - 800.7. An agency can meet its NHPA Section 106 responsibilities regarding the effects of a category of undertakings on historic properties by following an ACHP-approved program comment.

ACHP's program comment guidance states that the primary benefit of program comments is that they allow a federal agency to comply with Section 106 of the NHPA in a tailored, consistent way for a class of undertakings rather than addressing each undertaking individually. This is especially useful for the Army considering the magnitude of its historic housing inventory and the many thousands of similar repetitive undertakings occurring to repair, maintain, and improve this large housing inventory. This Program Comment provides the Army with an alternative means to comply with NHPA Section 106 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).

The need for this Program Comment is driven by the Army's obligation to provide safe, healthy, quality housing to Soldiers and their families, and the unique challenges the Army has in 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 the widespread deficiencies and significant quality of life, health, and safety issues affecting military families living in historic Army housing. These issues led to an Army Inspector General investigation and continue to receive a high level of attention from Congress, senior military officials, and military family members.

To meet its obligations to military families, the Army must implement specific *management actions* to improve pre-1919 housing conditions. The Army must improve the quality of life of Soldiers and their families, address the health and

safety risks from certain hazardous materials found in historic housing, ensure cost efficient, effective, and consistent management of the inventory, and use energy efficient building materials. The Army must also improve the NHPA Section 106 compliance process times for projects that improve pre-1919 housing in order to reduce impacts to military families waiting to occupy the housing.

Housing and associated material living conditions are critical factors for military families in the context of the challenges and stressors that Soldiers and their families must cope with in their daily lives. The Government Accountability Office found that a direct connection exists between poor military housing conditions and military readiness. Concerns among service members about poor housing conditions have been found to make it difficult to focus on the military mission. Some service members are leaving the military because of poor housing conditions, and the issue is also impacting the ability to recruit new service members.

For pre-1919 housing, the Army must abate the historic building materials used in housing from this period that present lead-based paint, asbestos, and other hazards to housing occupants; implement improvements and additions that address the need for modernization of living spaces; provide kitchen and bathroom improvements; use energy efficient building materials; implement other energy efficiency measures; modernize heating, cooling and ventilation systems; modernize plumbing and electrical systems; and install modern life safety and protective elements such as fire suppression systems and force protection features.

The Army also has the need to lease, transfer, or convey pre-1919 housing to facilitate housing operations by its privatized housing partners under the Army's Residential Communities Initiative (RCI). RCI operates under Army authority on Army installations nationwide through legal partnerships between the Army and private sector real property managers. Lease, transfer, and conveyance under this Program Comment is only for the purposes of transfer of pre-1919 housing to and between RCI partners, and between RCI partners and the Army.

Addressing NHPA Section 106 compliance requirements for the thousands of repetitive *management actions* occurring on this large inventory of pre-1919 housing presents unique and significant challenges for the Army. According to the *ACHP Program Comment Guidance*, the program comment approach as provided for in 36 CFR 800.14(e) was established to address situations such as this, where a federal agency has repetitive actions occurring within a large inventory of historic properties.

This and the Army's three prior ACHP-approved program comments for historic housing (Program Comment for Army Inter-War Era housing (1919-1940), Program Comment for Army Capehart-Wherry housing (1949-1962), and the Program Comment for Army Vietnam War Era housing (1963-1975)) provide the Army the ability to implement *management actions* in a more efficient, consistent, and cost-effective manner.

These program comments have, in turn, preserved the historic character of the housing, improved the quality of life, health, and safety of the military families living in historic Army housing, saved millions of dollars in rehabilitation costs for reinvestment into additional rehabilitation efforts, and ensured that historic Army housing will be preserved as a viable and sustainable military real property asset.

The implementation of the Program Comment for pre-1919 housing provides programmatic compliance with NHPA Section 106 for the repetitive *management actions* occurring on this large inventory of historic housing. In accordance with 36 CFR 800.14(e), the Army will implement this Program Comment and *management actions* in lieu of conducting individual project-by-project reviews.

## 1.0 The 2025 Annual Report

The 2025 Annual Report is submitted in fulfillment of the Program Comment. The 2025 Program Comment reporting period runs from 1 January 2025 through 31 December 2025. This Annual Report summarizes actions undertaken by the Army in 2025 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). 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*.

This Program Comment is consistent with and implements the *Secretary's Standards for Rehabilitation*. 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 maintains the integrity of pre-1919 housing and historic district location, design, setting, materials, workmanship, feeling, and association consistent with the *Secretary's Standards*.

## 2.0 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 selection procedures are established in section 8 of the Program Comment that consider the need to maintain the historic and architectural character of pre-1919 housing in a balanced priority with cost, 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 appended preservation planning documents: *Design Guidelines for Pre-1919 Army Housing* and *Building Materials Guidelines and Catalog for Pre-1919 Army Housing*.

The *Design Guidelines for Pre-1919 Army Housing* 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* 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 requirement 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 and energy efficiency. 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 many of 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 many *in-kind* wood windows. Vinyl windows 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.

### **3.0 Examples of 2025 Technical Support Provided for Implementation of the Program Comment**

#### **3.1 Site Specific Summary of 2025 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 in a manner that maintains the historic and architectural character of the historic housing and when consistent with the results of the Program Comment building materials selection procedure.

Technical assistance site visits to installations with pre-1919 Era housing were undertaken in 2025 in accordance with the Program Comment by preservation experts from Goodwin and Associates, who meet the of Secretary of the Interior professional qualification standards. The purpose of the site visits was to provide an overview of the Program Comment requirements; guidance in the application of Design Guidelines, Building Materials Catalog; and technical support related to proposed projects. Army private housing partners manage the historic housing on the majority of installations.

Installation	State	Number of Housing Units	Visit Date	Visit Type
Fort Benning	GA	1	November 12	In-person
USAG Hawaii	HI	17	December 9	In-person
Fort Sill	OK	73	June 24	In-person
Fort Bliss	TX	39	July 8	In-person
West Point	NY	84	December 5	In-person
Fort Riley	KS	109	July 11	In-person
Carlisle Barracks	PA	18	August 15	In-person
Fort Leavenworth	KS	91	July 8	In-person
Fort Sam Houston	TX	39	November 13	In-person
Presidio of Monterey	CA	37	November 10	Virtual

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

During the 2025 government shutdown, Goodwin experts identified Presidio of Monterey as a site suitable for a virtual meeting to discuss the Program Comment for Pre-1919 Housing and any on-going or upcoming projects applying the Program Comment. Ted Lim and Jose Cruz of The Michaels Organization (TMO) had agreed to a brief virtual discussion. During the Initial Development Period (IDP), all pre-1919 units were previously renovated. 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. During the meeting, the housing partner relayed to Goodwin that Presidio of Monterey had no on-going or upcoming projects that will affect their Pre-1919 housing units.

### Carlisle Barracks, Pennsylvania

During an August 15th site visit to Carlisle Barracks, Goodwin experts met with representatives from Army housing partner Balfour Beatty to review their Program Comment implementation. Balfour Beatty confirmed two key updates. First, the approved project to replace the roofs at the Lovell Apartments is moving forward. Second, an initial plan to conduct full kitchen and bathroom remodels in several pre-1919 units was canceled because the cost estimates were too high to pursue. As a result, the partner has since revised the scope for the pre-1919 units. The new plan, discussed during the 2025 site visit, is to proceed with a more limited project focused on replacing kitchen cabinets and appliances, without making any modifications to the floor plans.

### USAG Hawaii, Hawaii

Goodwin experts visited USAG Hawaii on December 9<sup>th</sup>, and met with representatives of Centinel, the installation's historic housing partner. Goodwin experts reviewed the Program Comment requirements with the historic housing partner and went over the building materials selection process, including the financial and maintenance considerations. The majority of the pre-1919 units are located on Fort Shafter's Palm Circle. Two units are in the process of being renovated. Renovations include window replacements, structural repairs, and flooring repairs. Landscaping is also being conducted within Palm Circle due to an invasive beetle that is attacking palm trees on the island. Three trees have been removed due to safety concerns. Remaining palms are being chemically and physically treated. The housing partner plans to replant palms that have been or will be removed. Upcoming projects include the installation of Electrical Vehicle chargers either along the rear of the houses or at the carports. The associated water tank is also planned for demolition. The water tank is located atop a hill that is designated a Native Hawaiian property of traditional religious and cultural importance and consultation with Native Hawaiian Organizations is currently underway.



Pre-1919 Era Palm Circle at USAG, HI (Goodwin 2025)

## Fort Bliss, Texas

Goodwin experts visited Fort Bliss on July 8th, and met with representatives of Balfour Beatty, the installation's historic housing partner. The meeting at Fort Bliss included a review of the Program Comment requirements and discussion of the building materials selection procedure. Fort Bliss has 39 units of pre-1919 housing. Previous housing projects included roofing repairs undertaken in 2023 due to a weather-related insurance claim. No work was proposed for the installation in 2024, and there are no active projects. Upcoming out-year projects include repairs to twenty of the detached garages, located to the rear of several pre-1919 housing units. Repairs include repainting, door spring replacement, and roof replacement. No other projects are currently planned. Replacement or repair of the windows on the Queen Anne Style housing units is under consideration; however, the project's commencement is not anticipated within the next five years, as the estimated cost is currently prohibitive.



**Pre-1919 Era Residence at Fort Bliss (Goodwin 2025)**



**Detached Garage at Fort Bliss (Goodwin 2025)**

## Fort Leavenworth, Kansas

Goodwin experts visited Fort Leavenworth on July 8th, and met with representatives of the Michaels Organization, the installation's historic housing partner. The meeting at Fort Leavenworth included a review of the Program Comment

requirements and overview of upcoming projects at the installation. The housing partner switched general contractors in January 2025 and has divided properties into four tiers. Tier 1 includes 99 residences that will receive full renovations. Tier 2 properties will receive mid-tier renovations. Tier 3 residences will be put off line. Tier 4 residences will be demolished. Tier 1 and Tier 2 projects will be completed in 2025. Tier 3 and Tier 4 projects may be completed in 2026 due to budgeting concerns. A master list of specifications has been developed as a guidebook for all renovations in order to maintain a consistent standard.

After completing the building materials selection process, porch renovations on two Pre-1919 properties were completed using imitative substitute materials. Additional porch renovations on Pre-1919 residences will take place following interior renovations scheduled for the upcoming few years. Renovations are being submitted to the Kansas State Historic Preservation Office (KS SHPO) for state historic tax credits and the KS SHPO has visited the historic district multiple times to assist with tax credit suitability. A major renovation is taking place on Unit 613. The property has not had an occupant in a number of years. State tax credits are being pursued for approximately 70 percent of the work proposed for the building. The remaining 30 percent of renovations suggested by KS SHPO were prohibitively expensive. The Building Materials selection procedure for Pre-1919 properties was reviewed for these properties.

Upon completion of the building materials selection process, the decision was made to use imitative substitute materials for replacements. Consequently, Michaels is transitioning to a pure white trim, as this is the most commonly available color on the market and creates a cohesive appearance. The selection process accounted for the significant cost and effort required to paint and maintain historic white trim. Between \$3 million and \$4 million have been allocated for window replacement on and these will be replaced on an as-needed basis following the building materials selection procedure.

Following the scheduled vacancy of the family housing in the pre-1919 infantry barracks this August; Michaels intends to proceed with demolition and redevelopment of the site. Goodwin indicated that the proposed demolition is not covered by the pre-1919 Program Comment and necessitates compliance with the standard Section 106 / 36 CFR 800 process. The demolition will be governed by regulations 36 CFR Parts 800.4 through 800.7, and Part 800.10 concerning National Historic Landmarks.



Pre-1919 Residence at Fort Leavenworth (Goodwin 2025)

## Fort Benning, Georgia

Goodwin experts visited Fort Benning on November 12<sup>th</sup>, and met with Mr. Richard Forster, Asset Manager at The Michaels Organization, the installation's historic housing partner. There is one pre-1919 housing unit at Fort Benning. Mr. Foster stated that while the one Pre-1919 has undergone recent updates in 2023, window repair or replacement is desired in the future. Planning for this potential project is conceptual, and no timeline has been determined at this time. Mr. Foster stated that the installation's housing operations were in a sustainment mode.

## Fort Riley, Kansas

Goodwin experts visited Fort Riley on July 11th, and met with representatives of Corvias, the installation's historic housing partner. The meeting included a review of the Program Comment and Buildings Materials Selection Procedure. During the meeting, the housing partner inquired about the installation of temporary fences in the backyards of Pre-1919 family housing units. The fences would not be attached to the fabric of the residences and would be freestanding. Goodwin confirmed with the housing partner that this is permitted under the Program Comment, providing direct language from the Program Comment stating that installation of new fencing or replacement of existing fencing is not subject to any specific design requirements or other criteria considering it is impermanent and removeable. No additional projects are planned.



Pre-1919 Residences at Fort Riley (Goodwin 2025)

## Fort Sam Houston

Goodwin experts visited Fort Sam Houston on November 13, and met with representatives of the Hunt Companies, the installation's historic housing partner. The meeting included a review of the Program Comment and the Building Materials Selection Procedure. Four Artillery porches were renovated during 2025 and included spindle replacement along the two-story wraparound porches. The renovation project averaged about 200 spindle replacements per home. After conducting the building materials procedure, the wood spindles, which had been identified as damaged or in poor condition, were replaced in-kind. As part of this renovation project, stair railings also were painted though the existing material and design were not altered. The remaining spindles are planned to be retained. The installation plans to continue spindle replacement on an as-required basis. Future projects may include roof replacement.

## Fort Sill, Oklahoma

During a meeting at Fort Sill on June 24th, Goodwin experts and representatives from Corvias, the installation's historic housing partner, reviewed the Program Comment and the Building Materials Selection Procedure. Regarding future projects, Corvias indicated that they are considering repair or replacement of geothermal units at some of their Pre-1919 homes. They confirmed that no other large-scale projects are planned at this time.



Pre-1919 Housing at Fort Sill (Goodwin 2025)

## West Point, New York

Goodwin experts visited West Point on December 5<sup>th</sup>, and met with representatives of Balfour Beatty, the installation's historic housing partner. The meeting began with a review of the Program Comment requirements, including a discussion on the purpose of the comments and how they are implemented. Goodwin explained that the Program Comments provided an alternative to standard Section 106 procedure and Programmatic Agreements. The Pre-1919 Program Comment was reviewed, and the Building Materials Selection Procedure was discussed. It was emphasized that adverse effects (demolition and new construction) are not covered under the Pre-1919 Program Comment and must comply with the standard Section 106 / 36 CFR 800 process.

Routine maintenance and exterior repairs, including chimneys, are being conducted on an as-needed basis across the installation. Balfour Beatty conducted the building materials selection process analyzing the materials, costs, and lead time of custom in-kind chimney pots versus pots comprised of substitute materials. After factoring in available state tax credits of \$13,500, the partner chose to use the substitute material chimney pots. In addition to this work, tuck pointing is planned for 31 Pre-1919 units in the Old English South and North neighborhoods. No other major projects are currently scheduled.



**Pre-1919 Housing Unit at West Point (Goodwin 2025)**

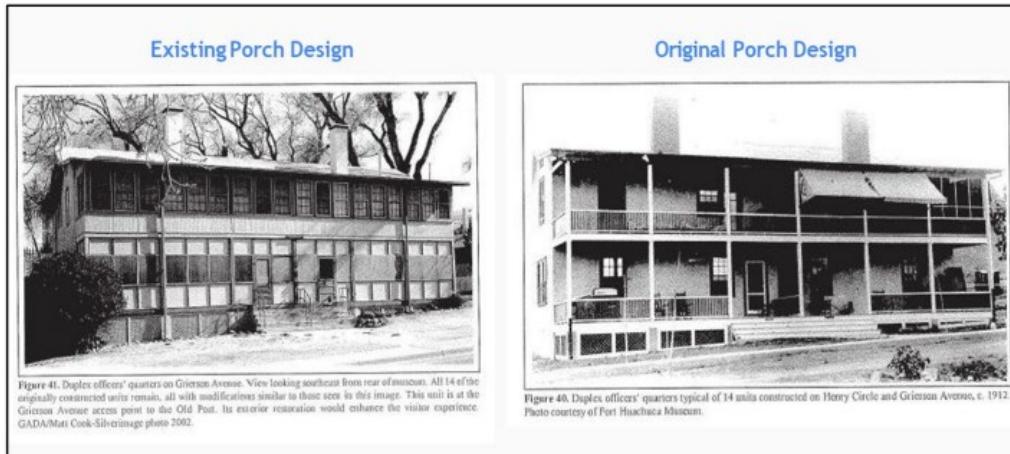


**Pre-1919 Housing Unit at West Point (Goodwin 2025)**

## Fort Huachuca, Arizona

In October 2025, the Fort Huachuca installation housing partner The Michaels Organization contacted Goodwin experts regarding a porch modification project for Pre-1919 Era housing units. Doug Gensler, Senior Investments Manager, explained that The Michaels Organization plans to revert modified porches on Pre-1919 housing units to their historic form. The proposed modification to contributing

resources to the Fort Huachuca National Historic Landmark (NHL) district is supported by the Secretary of the Interior's (SOI) Standards for Rehabilitation and within the parameters of the Program Comment. Mr. Gensler expressed a desire to return the porches to their original configuration based on historic photographs and drawings with an intention to be faithful to the original appearance and materials. Goodwin is offering ongoing technical expertise for this proposed project.



Existing porch design (left) and original porch design (right) at Fort Huachuca (Michaels)

### 3.2 Examples of 2025 Actions

Table 1 provides several examples of actions taken to maintain pre-1919 Era housing in 2025 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**

<b>Installation</b>	<b>Action</b>	<b>Number of Units</b>
Fort Bliss	Roof repair of detached garages	20
Fort Leavenworth	Porch renovations	2
Fort Leavenworth	Major renovation	1
Carlisle Barracks	Roof replacement	4
Fort Sam Houston	Spindle Replacement	N/A

### 4.0 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 2025 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. This Program Comment continues 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 Era housing at multiple locations. The building materials selection criteria and procedures will be followed for each action. Those activities will be reported in future Annual Reports. The Army is confident that implementation of ongoing Program Comment programs, sustained professional assistance, technical support, oversight, and monitoring will ensure that the historic and architectural character of the housing is maintained while the quality of life and overall material living conditions of Army military families is improved and enhanced.

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.