



**FINAL PROGRAM COMMENT PLAN FOR  
ARMY VIETNAM WAR ERA HISTORIC  
HOUSING, ASSOCIATED BUILDINGS AND  
STRUCTURES, AND LANDSCAPE  
FEATURES (1963-1975)**

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# FINAL PROGRAM COMMENT PLAN FOR ARMY VIETNAM WAR ERA HISTORIC HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES (1963-1975)

## I. INTRODUCTION, PURPOSE AND NEED, GOAL AND OBJECTIVE

### INTRODUCTION:

Program Comments are an alternate method for Federal agencies to meet their obligations under the National Historic Preservation Act (NHPA) 54 USC 306108 (Section 106). The Advisory Council on Historic Preservation's (ACHP) Section 106 regulation at 36 CFR 800.14(e) sets forth the regulatory process for issuing Program Comments.

The Department of the Army's (Army) enduring partnership with the ACHP and past use of the Program Comment process has successfully integrated historic preservation as part of the solution to some of the Army's most critical military family housing issues. The Army's currently proposed *Program Comment for Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)* (Army Program Comment) builds on the precedents set by the ACHP's issuance of the Program Comment for Army Capehart and Wherry Era historic military family housing in 2002, and the Program Comment for Army Inter-War Era historic military family housing in 2020. The Army is deeply appreciative of the ACHP's continued support and interest in the care and well-being of the Army's Soldiers and their families.

On 22 September 2021, an ACHP Program Comment Panel issued recommendations to improve the use of Program Comments as a tool for NHPA Section 106 review efficiency. While many of the Panel's recommendations address internal ACHP processes, several recommendations are applicable to Federal agencies seeking a Program Comment from the ACHP. This *Program Comment Plan for Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)* (Program Comment Plan) was developed to address the ACHP Program Comment Panel recommendations.

The ACHP Program Comment Panel recommends early coordination for the development of the Program Comment. Agencies are recommended to consult with ACHP staff early in the consideration of a Program Comment to clarify the agency's goals and confirm that a Program Comment will meet the agency's needs. Beginning in July 2021, preceding the ACHP Program Comment Panel recommendations, the Department of the Army (Army) Federal Preservation Officer (FPO) initiated discussions with ACHP staff regarding the Army's need for a Program Comment to address the many repetitive management actions occurring on its large inventory of similar housing types from the Vietnam War Era (1963-1975).

The Army FPO initiated direct dialogue with the ACHP Executive Director on 27 September 2021, following the discussions with ACHP staff. The ACHP Executive Director was informed of the Army proposal for a Program Comment for Vietnam War Era housing (1963-1975), and was asked to clarify the timing and process for implementing the ACHP

Program Comment Panel recommendations relative to the Army's plans to initiate a Program Comment for Vietnam War Era housing.

The recommendations of ACHP Program Comment Panel state that once a Federal agency decides to develop a Program Comment, ACHP staff should encourage the agency to formulate a development plan outlining timing, outreach, and consultation strategies incorporating ACHP guidance and staff advice. The Panel also indicated that Federal agencies should be encouraged to share their preliminary plan with the ACHP for review prior to the agency making a formal request. According to the Panel, the preliminary plan should explain the category of undertakings to be covered by the Program Comment, the likely effects on historic properties, and the steps the agency will take to ensure the effects are taken into account.

While the Army understands that submission of materials before a formal request for a Program Comment is not required by regulation, the Army implemented the ACHP Program Comment Panel recommendations. The Army prepared a Program Comment plan and requested and incorporated ACHP staff advice. On 29 September 2021, the Army FPO provided ACHP staff with a preliminary draft of its Program Comment Plan for Vietnam War Era housing and requested ACHP staff review and comment. The preliminary draft Program Comment Plan explained the category of undertakings to be covered by the proposed Army Program Comment, the likely effects on historic properties, and the steps the Army would take to ensure the effects are taken into account. ACHP staff responded and provided guidance and advice on the Army's preliminary draft Program Comment Plan. The Army FPO revised the Program Comment Plan with respect to the ACHP staff comments.

On 8 October 2021, the Army FPO provided formal notification to the ACHP Executive Director of the Army's intent to seek a Program Comment for Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975). That formal notification included the Army's revised Program Comment Plan and requested ACHP review of the revised Plan.

On 14 October 2021, the Army FPO provided the Program Comment notification and the revised Program Comment Plan to the National Trust for Historic Preservation (NTHP), the National Conference of State Historic Preservation Officers (NCSHPO), and the National Association of Tribal Preservation Officers (NATHPO), as both ACHP members and as public leaders in historic preservation. The Army FPO informed the NTHP, NCSHPO, and NATHPO about the goal of the Program Comment, the management actions to be addressed by the Program Comment, and also indicated that the Program Comment Plan was intended to be responsive to the recommendations of the ACHP Program Comment Panel. The Army FPO further indicated to the NTHP, NCSHPO, and NATHPO that the Army had invested time in planning and developing the proposed Program Comment Plan including prior consultation with ACHP staff to ensure the goal is clear, confirm that a Program Comment will meet the Army's needs, identify the proposed Army Program Comment development timeline, and to clarify responsibilities for consultation.

On 28 October 2021, the Army FPO received additional comments on the Program Comment Plan from ACHP staff. The ACHP Office of Federal Agency Programs (OFAP)

provided consolidated staff comments intended to hone the Army Program Comment intent and process. OFAP stated that the Army's Program Comment Plan for Vietnam War Era housing reflected a fully formed Program Comment proposal. The Army FPO revised and reissued the public review draft of the Program Comment Plan dated 8 November 2021.

The 8 November 2021 Program Comment Plan was subject to a nation-wide 30-day public review and comment by means of an Army Federal Register notification. The Federal Register Notice of Availability (NOA) at 86 FR 63003 informed the public of the Army's intention to seek a Program Comment for Vietnam War Era housing from the ACHP, and provided the Army Program Comment Plan for a 30-day public review and comment period. To ensure broad awareness of the Federal Register notice and the opportunity to review the Army Program Comment Plan, the Army FPO also reached out directly via email to over 850 NHPA stakeholders including the ACHP, all State Historic Preservation Offices (SHPOs), all Tribal Historic Preservation Offices (THPOs), and all Federally-recognized tribes, Native Hawaiian Organizations, and members of the interested public including the following non-governmental historic preservation organizations: NTHP, NATHPO, NCSHPO, and the Historic Hawaii Foundation (HHF). Additionally, the Army made an announcement on social media via our historic preservation Twitter account regarding the Federal Register NOA and availability of the Army Program Comment Plan for public review.

The Army received a total of 11 comments on the Program Comment Plan from one Federally-recognized Indian tribe (Choctaw), seven SHPOs (AL, CO, MO, OK, SC, TX, and VA), and three non-governmental preservation organizations (NTHP, HHF and NCSHPO). A new section has been added to this final Program Comment Plan (Section XVI) that summarizes the public comments received and the Army's response. This final Program Comment Plan, dated 28 December 2021, will be used to guide and inform the Army's Program Comment public participation and stakeholder consultation process detailed in Section II. The Program Comment Plan contains the best information available at this time.

This final Program Comment Plan includes the following: Introduction, Purpose and Need, Goal and Objective; Program Comment Development Process, Schedule, and Public Participation; Scope of the Program Comment; Location, Numbers and Description of the Historic Property Type, Category of Undertakings; Previous Installation-Specific NHPA Compliance Activities for Army Vietnam War Era Housing; National Register of Historic Places (NRHP) Eligibility Determination for Army Vietnam War Era Housing; Application of the NRHP Eligibility Determination; Potential Effects on Historic Properties; Mitigation Measures and Benefits of the Program Comment; Applicability of the Program Comment; Implementation of the Program Comment; Effect And Duration of the Program Comment; Definitions; Army Vietnam War Era Housing Photographic Examples; and Public Participation and Review of the Program Comment Plan.

#### **PURPOSE AND NEED FOR THE PROGRAM COMMENT:**

The Army is a large, complex Federal agency with a national defense mission to provide combat-ready military forces needed to deter war and protect the security of the United States. The Army's real property is a vital component of its national defense mission. As the largest

military service in the Department of Defense (DoD), the Army manages the largest portfolio of real property, including historic buildings, in the DoD.

The Army is a proud steward of the nation's history. The Army was officially established in 1775, and is one of America's oldest Federal institutions. Many of the buildings constructed by the Army over its 246-year history are now historic properties. Many historic buildings, including historic housing, continue to function as Army real property assets necessary for our national defense mission. Among those historic real property assets, historic housing is a significant concern; it is a large part of the Army's total housing inventory and is critical to the well-being of thousands of Soldiers and their families. The Army manages more than 100,000 housing units, over 30,000 of those are historic housing units.

The Army is faced with the extraordinary challenge of managing the largest inventory of historic housing in the Federal government. The Program Comment process allows the Army to take a departmental-wide national perspective and approach to managing its historic housing inventory. The Program Comment permits the Army to place individual installation-level resources into a national context, obtain a more holistic perspective on the property type and its significance, and thereby reach more consistent and appropriate preservation outcomes.

The Army embraces its responsibility to manage this large inventory of historic housing in accordance with the NHPA and in balance with concerns for the quality of life, health, and safety of the military families that live in historic housing. Of its over 30,000 historic housing units, the Army has over 7,500 housing units constructed during the 13-year Vietnam War Era from 1963-1975. The Army's 7,500 units of Vietnam War Era housing are subject to thousands of repetitive management actions annually to maintain, manage, and improve the housing for military families.

Addressing NHPA Section 106 compliance requirements for the thousands of repetitive management actions occurring on this large inventory of modern housing from the Vietnam War Era presents unique and significant challenges for the Army. The scope and magnitude of this challenge requires that we shape our NHPA compliance in innovative ways. According to the *ACHP Program Comment Questions and Answers*, Program Comments as provided for in 36 CFR 800.14(e), were established to specifically address situations such as this, where a Federal agency has many repetitive management actions occurring within a large inventory of similar historic property types. The proposed Program Comment is the best available NHPA compliance solution for Army Vietnam War Era housing. If a Program Comment is not in effect, the Army is faced with high costs and lengthy process times to comply with NHPA Section 106 for each management action occurring on each Vietnam War Era housing unit on project-by-project basis.

Without a Program Comment, significant compliance costs and process times are required to complete the NHPA Section 106 / 36 CFR 800.3 - 800.7 compliance process for each proposed management action. Each Army installation must inventory and identify each housing unit, evaluate NRHP eligibility of each unit, assess effects and adverse effects of each proposed management action, resolve any adverse effects through develop of Memoranda of Agreement (MOA), and then implement any MOA required mitigations; or if an MOA cannot be reached,

terminate consultation and elevate the individual action to the head of the agency – the Secretary of the Army – for a final decision. This compliance process is required for each management action on a case-by-case / project-by-project basis and must occur in consultation with individual SHPOs, each affiliated Federally-recognized Indian tribe or Native Hawaiian Organization, and other stakeholders in accordance with 36 CFR 800.3 - 800.7.

The Army requires a more efficient, consistent, and cost effective means to manage the many repetitive management actions occurring on this inventory of over 7,500 Vietnam War Era housing units. When the ACHP issued Program Comments for Capehart and Wherry Era historic military family housing (1949-1962), DoD officials indicated that the Program Comment would save \$80 million to \$90 million in NHPA compliance costs by not having to address each of those housing units on an individual case-by-case basis (see *ACHP Section 106 Success Story: Capehart Wherry Housing Challenge Spurred Innovative Solution*). When the ACHP issued the Program Comment for Army Inter-War Era historic military family housing (1919-1940) in 2020, the Army estimated that it would create \$450 million in NHPA related compliance cost savings over its 35-year duration. The Army anticipates that such significant NHPA compliance cost savings will also result from the Program Comment for Vietnam War Era housing.

Local Army installation-level project-by-project compliance has resulted in inconsistent preservation outcomes for the Army's Vietnam War Era housing property type. The Program Comment process allows the Army to achieve a much broader national perspective on a property type and its significance than local installations possess and account for in their project specific compliance actions. The Congressionally authorized Military Construction - Army (MCA) program funded Army housing construction in the Vietnam War Era, and that construction occurred in accordance with new standardized DoD-wide housing designs published in 1964. As detailed in Section VII., those new standardized departmental-wide housing design requirements further evolved the military family housing landscape on Army installations where it was constructed.

In addition to the need for more efficient, consistent, and cost effective NHPA compliance, the Army and this nation have an obligation to ensure the quality of life, health and safety of the military families who live in historic housing. To meet this obligation, the Army must address the extensive recurring maintenance, repair, and rehabilitation requirements for this housing and seek to control those costs through the use of current industry standard building materials and methods; abate the building materials used in housing from this period that present lead-based paint, asbestos, and other hazards to housing occupants; implement renovations that address the need for additional bedrooms and expanded living space; provide kitchen and bathroom improvements; improve energy efficiency and climate resiliency; modernize heating, cooling and ventilation systems; modernize plumbing and electrical systems; and address NHPA compliance processes that can delay the rapid turnaround of housing units for reassigned military families.

To make certain that the inventory of Vietnam War Era historic housing is able to be maintained as a sustainable real property asset, the Army also must have the ability to manage its total Vietnam War Era housing inventory including mothballing housing, and while infrequent, cease maintenance and partially or wholly demolish housing that is highly deteriorated,

underutilized, vacant, or presents health hazards or unsafe conditions for occupants. When Army housing has been demolished in the past, it has typically occurred to remove highly deteriorated, vacant, and underutilized housing in order to provide for the construction of new replacement housing for military families.

Additionally, the Army has need to lease, transfer, or convey Vietnam War Era housing to allow for the Army's management of the inventory and facilitate housing operations by our housing privatization partners under the Army's Residential Communities Initiative (RCI). RCI operates on Army installations through the operation of legal partnerships between the Army and private sector developers. The Army is a member of the RCI partnership at each installation. The RCI privatization partnership maintains an Army nexus with the housing, and compliance with the NHPA remains a requirement for privatized housing. Current RCI partnerships and ground leases with the Army run through 2055. Nearly all (99%) of Army Vietnam War Era housing has been privatized.

In consideration of the repetitive actions required to repair, maintain, improve, and manage the Vietnam War Era housing inventory, the category of undertaking for purposes of the Program Comment is *management actions* defined as: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of current readily available industry standard building materials and methods in the implementation of management actions.

The Program Comment provides the Army the ability to implement management actions in a more efficient, consistent, and cost effective manner. These actions in turn improve the quality of life, health, and safety of the Army families living in Vietnam War Era housing and help ensure that the inventory of Vietnam War Era historic housing will continue to function as a viable and sustainable real property asset. Efficient, consistent, and cost effective management provided by the Program Comment will improve the quality of life, health, and safety for military families living in the housing, ensure the housing is a mission-supporting real property asset, while maintaining the continued historical use as housing.

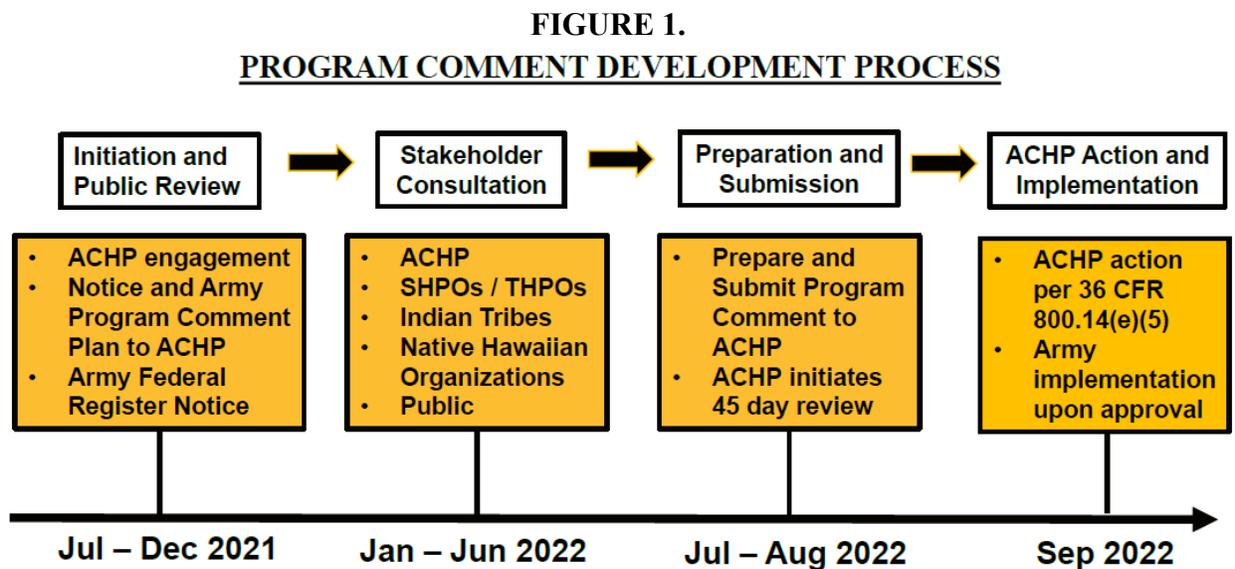
#### **GOAL AND OBJECTIVE:**

The Army's goal for the Program Comment is to obtain programmatic compliance with the NHPA 54 USC 306108 (Section 106) for the repetitive management actions occurring on this large inventory of similar property types by means of the program alternative procedure under 36 CFR 800.14(e), in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7. The objective of the Program Comment is to achieve the goal in a manner that provides the appropriate balance between historic preservation of the housing and the efficient, consistent and cost effective management of the housing in order to improve of the quality of life, health, and safety of the Army families living in Vietnam War Era housing. The goal and objective will be met by the ACHP's adoption of the Program Comment, and the Army's implementation of the Program Comment management actions and mitigation measures.

## II. PROGRAM COMMENT DEVELOPMENT PROCESS, SCHEDULE, AND PUBLIC PARTICIPATION

The Army is conducting extensive consultation with stakeholders during its Program Comment development. The Army’s consultation is consistent with the intent and meaning of consultation in the Section 106 process as defined in 36 CFR 800.16(f). The Army will seek, discuss, and consider the views of all participants in the Program Comment consultation process and, where feasible, seek agreement with them regarding matters arising during the consultation.

The Army is planning to submit the Program Comment to the ACHP in August 2022, for ACHP action accordance with 36 CFR 800.14(e)(5). Prior to that submission, the Army will implement the extensive Program Comment development and consultation indicated in Figure 1. The Army is following a four phase Program Comment development process:



The first phase of the Army’s Program Comment development process is *Initiation and Public Review*. Initiation and Public Review occurred from July 2021 through December 2021, concluding with this revised Program Comment Plan. This phase included the Army FPO’s initial engagement with ACHP staff regarding the need for a Program Comment, formal notice to the ACHP Executive Director of the Army’s intent to seek a Program Comment, preparation of the Program Comment Plan in coordination with ACHP staff, and public review of the Program Comment Plan via an Army Federal Register announcement and other public outreach. The Federal Register NOA, at 86 FR 63003, informed the public of the Army’s intention to seek a Program Comment for Vietnam War Era housing from the ACHP, and provided the Army Program Comment Plan for a 30-day public review and comment period. The Army FPO also reached out directly via email to over 850 NHPA stakeholders including the ACHP; all SHPOs, THPOs, and Federally-recognized tribes; Native Hawaiian Organizations; and members of the interested public including representatives from the NTHP, NATHPO, NCSHPO and HHF to ensure awareness of the Federal Register notice and the opportunity to review the Army Program Comment Plan. Additionally, the Army made an announcement on social media via the account

used for Army historic preservation communication (DoD Environment, Safety and Occupational Health Network and Information Exchange (DENIX) Twitter account (@DENIXnews)) regarding the Federal Register NOA and availability of the Army Program Comment Plan for public review. Revisions resulting from the public review are incorporated in this final Program Comment Plan. The Program Comment Plan will now be used to inform and guide the second phase of development process involving extensive stakeholder consultation.

The second phase of the development process is *Stakeholder Consultation*. Stakeholder consultation will occur from January 2022 through June 2022. Concurrent with the release of this final Program Comment Plan, the Army FPO is releasing a nation-wide announcement and invitation to over 850 NHPA stakeholders to participate in a series of nation-wide Section 106 consultation conferences for the Army's proposed *Program Comment for Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)*. The nation-wide consultation conferences will occur monthly by means of telephonic conference calls. The Army Program Comment Plan will guide and inform the 2022 consultation along with other pertinent documents and information posted on the Program Comment website: <https://www.denix.osd.mil/Army-vwehh-pc>. The consultation conferences are planned to address all major topics in the Program Comment Plan and any issues identified during the previous public review. The Army FPO will provide a briefing on a specific Program Comment topic at each consultation conference, followed by open forum discussion with all interested party participants. The planned monthly Program Comment topics for the 2022 stakeholder consultation are as follows.

**Planned 2022 Monthly Program Comment Consultation Topics:**

January: Introduction, Scope, Purpose and Need, Goal and Objective, Development Process  
February: Vietnam War Era Housing Property Type, Category of Undertaking  
March: National Register Eligibility and Potential Effects  
April: Mitigation Measures and Benefits of the Program Comment  
May: Applicability, Implementation, Effect, and Duration  
June: Consultation Summary and Conclusion

The Army FPO's nation-wide announcement and invitation to this monthly series of nation-wide Section 106 consultation conferences will contain all necessary contact information for stakeholder participation. Written comments regarding the proposed Program Comment from interested parties are invited at any time during the entire 26 January 2022 – 29 June 2022 consultation period. Written comments should be submitted to the Army FPO at the following email address: [david.b.guldenzopf.civ@army.mil](mailto:david.b.guldenzopf.civ@army.mil).

The third phase of the Army's Program Comment development process is *Preparation and Submission* of the Program Comment that will occur in July and August 2022. During this phase, the Army FPO will prepare the Program Comment based on the most current information and taking into account all prior public participation and consultation with interested parties. The Army FPO will, as the agency official, will formally submit the proposed Program Comment to the ACHP Executive Director and request ACHP action. Once the Army FPO submits the proposed Program Comment, the ACHP, in accordance with 36 CFR 800.14(e)(3)

and (4), initiates their own Program Comment consultation. The ACHP notifies and considers the views of SHPOs, THPOs, on the proposed Program Comment. Subject to specified considerations, the ACHP also initiates consultation on the proposed Program Comment with Indian tribes and Native Hawaiian Organizations.

The final phase of the Program Comment development process is *ACHP Action and Army Implementation*, planned to occur in September 2022. Following the ACHP's consultations on the proposed Program Comment, the ACHP may ask for revisions to the Program Comment. The ACHP membership votes to either approve and adopt the Program Comment or disapprove the Program Comment. The ACHP may also decline to act on the Program Comment. The ACHP notifies the Army regarding the ACHP membership's decision within 45 days of receiving the Army's submission of the Program Comment. If the Program Comment has been approved, the Army will proceed with implementation of undertakings in accordance with the terms of the Program Comment. If the Program Comment is not adopted by the ACHP, the Army must comply with 36 CFR 800.3 -800.7 for undertakings effecting the subject historic properties.

### **III. SCOPE OF THE PROGRAM COMMENT**

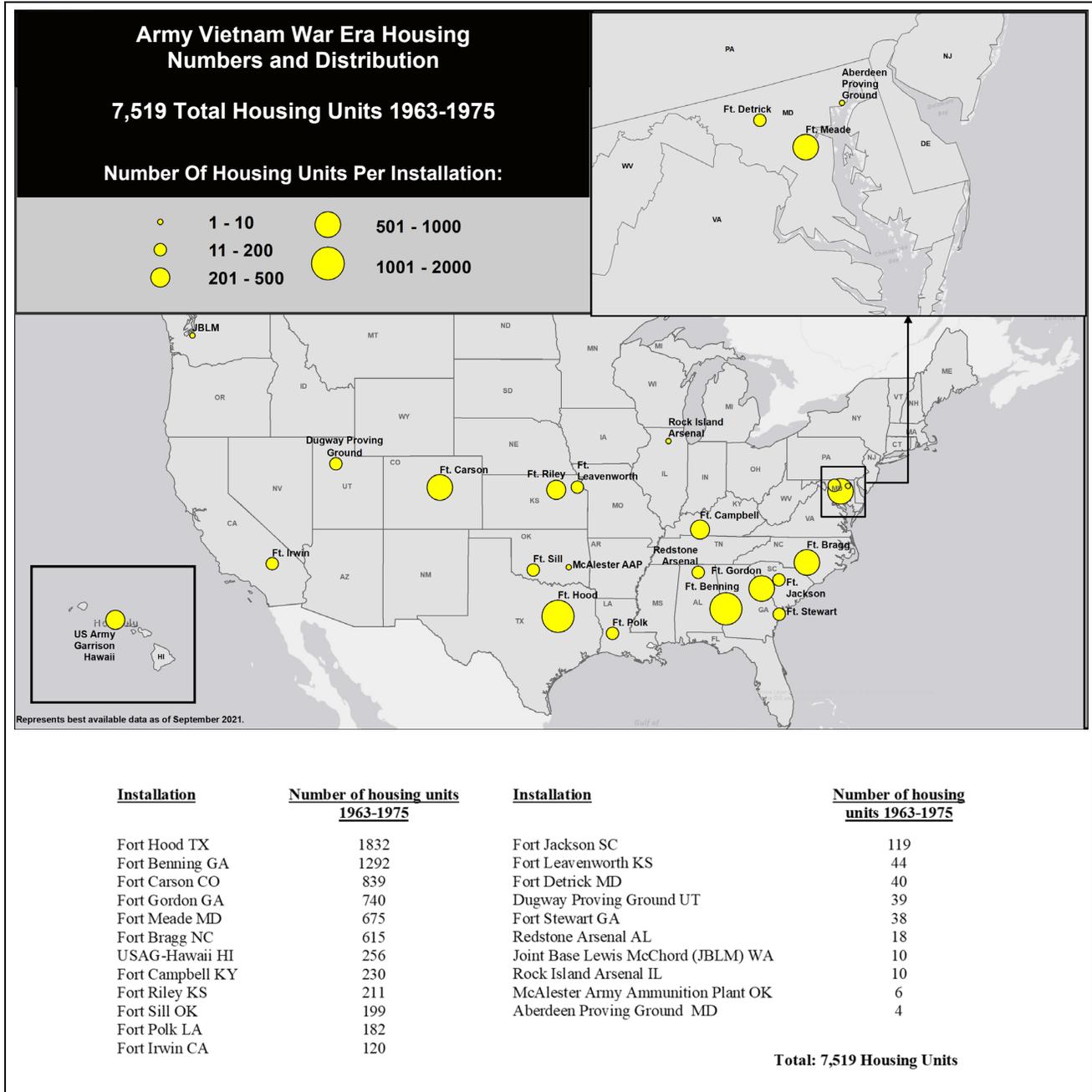
The Army is seeking a Program Comment in accordance with 36 CFR 800.14(e), for its inventory of Army Vietnam War Era housing, associated buildings and structures, landscapes and landscape features, and neighborhoods (1963-1975), both privatized and Army-owned. The Army's best available information indicates that there are a total of 7,519 Vietnam War Era housing units on 22 Army installations in 16 states.

The number of housing units per installation ranges from over 1,800 on Fort Hood TX, to 4 housing units on Aberdeen Proving Ground MD. The Vietnam War Era housing at Fort Meade, MD is an exception and will be excluded from the Program Comment. Vietnam War Era housing at Fort Meade is subject to a Deed of Easement, and will remain subject to the terms and conditions of the Deed of Easement rather than the Program Comment. Additional specific information on applicability of the Program Comment is found in Section XI.

### **IV. LOCATIONS, NUMBERS, AND DESCRIPTION OF THE HISTORIC PROPERTY TYPE**

Figure 2 provides the locations and numbers of Army Vietnam War Era housing addressed by the Program Comment. The number of Army Vietnam War Era housing units is presented geographically by location and order of magnitude on the map and is listed by installation in descending numerical order below the map. The Army's building inventory is dynamic, and is adjusted as actions occur and information is provided to refine the housing inventory numbers. The best available inventory information indicates there are 7,519 Vietnam War Era (1963-1975) housing units on 22 Army installations in 16 states. Over 99% of Army's Vietnam War Era housing is privatized housing operated under the RCI program. Only 16 total housing units (10 units at Rock Island Arsenal, IL, and 6 units at McAlester Ammunition Plant, OK) from this period have not been privatized under the RCI program. The Program Comment is intended to address both privatized and non-privatized Vietnam War Era housing.

**FIGURE 2.**



According to the National Park Service, a property type is a grouping of individual properties defined and characterized by common physical and / or associative attributes. A property type may include a variety of buildings and structures, and variations will occur with a property type based on cultural, chronological, and geographical influences. (See National Register Bulletins 15, 16A, and 16B). The Army Vietnam War Era Property Type 1963-1975 is

comprised of Army Vietnam War Era housing, associated buildings and structures, landscapes and landscape features, and Vietnam War Era neighborhoods, as defined in Section XIV.

The US Army Corps of Engineers (USACE) led the contracting and construction for Army family housing during the Vietnam War Era (1963-1975). USACE used standardized housing design plans developed for DoD by civilian architectural firms for their Army housing construction contracts, and hired architectural and engineering firms from the private sector to construct the Army family housing at each installation. Army family housing constructed during this period used similar building materials and construction methods that were used in the private sector during this period.

Army housing from this period can be generally categorized as Modern Housing, with examples of ranch, contemporary, shed, and split level designs present. Beginning in 1964, townhouse designs were prepared and constructed by the Army in significant numbers. Townhouses became a predominate type of Army family housing constructed throughout the Vietnam War Era. The Army townhouse neighborhoods followed standard civilian sector principles of residential cluster development, grouping the townhouses together on a development site taking advantage of natural topography, and affording more open space.

The townhouses were constructed for enlisted personnel and up to and including company grade officers. Further information on Army Vietnam War Era housing is provided in in Section VI., Section VII., and Section XV. Detailed descriptions of Vietnam War Era housing from several Army installations may be found on the Army Vietnam War Era Housing Program Comment website <https://www.denix.osd.mil/Army-vwehh-pc>.

## **V. CATEGORY OF UNDERTAKINGS**

The Army's large inventory of Vietnam War Era housing, associated buildings and structures, and landscape features are subject to frequent and repetitive undertakings. The category of undertakings for purposes of the Program Comment is *management actions*: maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of current readily available industry standard building materials and methods in the implementation of management actions. This category of undertakings is defined based on both the Army's needs and on precedent set by the ACHP in their approval of other Program Comments for Army family housing. The category of undertaking defined for this Program Comment is nearly identical to the category of undertakings approved and adopted by the ACHP in the Army's Program Comment for Army Capehart and Wherry Era historic military family housing approved by the ACHP in 2002, and the Program Comment for Army Inter-War Era historic military family housing approved by the ACHP in 2020. Collectively, as demonstrated by past precedent, when implemented under a Program Comment these management actions are more consistent, process efficient, and cost effective. The cost and process efficiencies will help ensure that the inventory of Vietnam War Era historic housing will be a viable real property asset into the future, and the results of the management actions will significantly benefit the overall well-being of military families while maintaining the continuity of historic use as housing.

Housing from this period was typically constructed with single-pane windows; asbestos containing shingles and siding; minimal wall and attic insulation; galvanized steel pipes for water supply; cast iron drain pipes; 100-amp circuit breakers; now obsolete HVAC components, lead-based paint, asbestos floor and ceiling tiles, and asbestos pipe insulation. Additionally, building elements deteriorate and are damaged and must be replaced, as commonly occurs with this housing. Mold is also a significant issue in this housing. While many of these issues and requirements may have been addressed in the past, many remain, and many continue to arise.

The continuous maintenance, repair, replacement, and improvement requirements for this housing necessitates: roof repair and replacement, siding replacement, correction of structural defects and deteriorated building elements, abatement or removal of lead-based painted and asbestos containing building materials to reduce or eliminate health risks, actions such as window replacement to improve energy efficiency and climate resiliency, mold abatement, bedroom and additional living space additions, interior upgrades and renovations especially to bathrooms and kitchens, upgrade and replacement of HVAC components, replacement of obsolete plumbing lines subject to rust and leaks, and upgraded electrical service and replacement of electrical panels and wiring to ensure safety.

Maintenance, repair, rehabilitation, and renovation are ongoing activities to address and improve the material living conditions of the military families occupying this housing. Housing constructed during this period was smaller with less square footage than housing built today, so action may be required to provide additional bedrooms and expanded living space, along with kitchen and bathroom upgrades and energy efficiency and climate resiliency improvements to meet the quality of life expectations for military families. The use of current industry standard building materials and methods in the implementation of these management actions is required to address health, safety and cost concerns associated with the original building materials used in this housing.

To ensure Vietnam War Era historic housing is sustained as a viable real property asset, the Army also must have the ability to manage its total housing inventory by actions including mothballing, ceasing maintenance, and demolition. Mothballing may be needed to close up and deactivate housing and / or associated buildings and structures for a long period, with the intent that the property would be brought back to a mission supporting operational status at a future time as needed. The Army may also need to cease maintenance and repair of housing and /or associated buildings and structures when such properties are vacant or underutilized and there is no viable alternative use or intent to bring the property back to operational status at a future time, and resources are and will remain unavailable for maintenance, mothballing, alternative use, or demolition of the property.

To effectively manage its total inventory, the Army may also need to partially or wholly demolish Vietnam War Era housing. Demolition may be partial and include interior demolition of walls, ceilings, and mechanical systems while maintaining the exterior. Partial demolition may also remove specific interior or exterior portions of the housing, associated buildings and structures and landscape features while maintaining other portions or features. Demolition may be complete and fully remove Vietnam War Era housing that is deteriorated, vacant,

underutilized, presents health hazards or unsafe conditions for occupants, or to allow for new construction.

New construction may also need to occur within Vietnam War Era neighborhoods, often to replace housing that is deteriorated, vacant, underutilized, or presents health hazards or unsafe conditions for occupants. New construction within existing Vietnam War Era housing neighborhoods includes: construction of new housing, associated buildings and structures, and landscape features; construction or replacement of associated above and below ground utilities and systems; and may or may not occur in the immediate area of a demolished Vietnam War Era house, associated building or structure, or landscape feature.

Additionally, the Army has need to lease, transfer, or convey Vietnam War Era housing for the purposes of housing privatization, to allow for the implementation of management actions and general housing operations by our housing privatization partners under the RCI program, and to allow the Army to manage its overall inventory. This includes the execution of lease, transfer and conveyance documents for the purposes of possession, management, operation, and transfer of Vietnam War Era housing; transfers and conveyances of existing ground leases and property ownership between RCI partners and by the Army; and actions to transfer or convey excess Vietnam War Era housing by sale or other means out of Army or RCI partner ownership and control.

At each installation with RCI housing, the Army conveys ownership of existing housing and leases land to the RCI partnership. The RCI partnership then operates and manages the conveyed housing and leased lands for military housing purposes. Upon termination of the ground lease, ownership of all RCI partnership owned improvements, including all housing located within the boundaries of the ground lease, is automatically conveyed back to the Army from the RCI partnership. Current RCI partnership ground leases with the Army run through 2055.

## **VI. PREVIOUS INSTALLATION-SPECIFIC NHPA COMPLIANCE ACTIVITIES FOR ARMY VIETNAM WAR ERA HOUSING**

Many of the 22 Army installations with Vietnam War Era housing, ten installations have conducted project or site-specific inventories of Vietnam War Era housing and have consensus determinations of eligibility from their SHPO. The NRHP determinations by those installations and SHPOs are not consistent, both *not eligible* and *eligible* determinations have been made for the same Vietnam War era housing property type. From an Army-wide perspective, this has resulted in inconsistent preservation outcomes for this property type in terms of NRHP eligibility determinations, application of treatment standards, and execution of mitigation measures.

Nine Army installations report that they conducted NHPA inventory and evaluation actions and determined Vietnam War Era housing to be *not eligible* for the NRHP with SHPO concurrence (Redstone Arsenal AL, Fort Carson CO, Fort Gordon GA, Fort Stewart GA, Fort Hood TX, Fort Jackson SC, McAlester Ammunition Plant OK, Fort Polk LA, and Fort Sill OK). These NRHP eligibility determinations were made prior to the housing reaching 50 years of age. Housing less than 50 years old is subject to evaluation under the higher 36 CFR 60.4(g) criteria

consideration of *exceptional importance* in order to be considered eligible for the NRHP, rather than the standard NRHP evaluation criteria at 36 CFR 60.4(a)-(d). When these installations evaluated Vietnam War Era housing for NRHP eligibility before reaching 50 years of age, a common cited reason for the installation-specific *not eligible* determinations is the lack of integrity of the housing due significant material alterations and replacements. The following examples from installation-specific NRHP *not eligible* consensus determinations illustrate this point:

At Fort Hood TX, the SHPO's consensus *not eligible* determination for the Venable Village housing area (140 one-story, wood frame ranch-style duplex housing constructed in 1970) was based on the inventory and evaluation report for the housing. The report evaluated the 48-year old housing against the standard NRHP evaluation criteria 36 CFR 60.4(a)-(d) and states: "Although broadly falling under the post-war Ranch Style, the structures do not embody distinctive characteristics of a particular style and are not significant under Criterion C. All of the structures have had substantial modifications and no longer convey their associative significance under Criterion A. The integrity of design, materials, workmanship and feeling has been lost due the modifications. On a typical unit, all windows and exterior doors have been replaced and aluminum siding has completely covered the exterior. Eligibility Status: Not Eligible due to lack of integrity of design, materials, workmanship and feeling." (Historic Resources Inventory, Exterior Survey and National Register Evaluation of 166 Buildings and Structures, Fort Hood, Bell County, Texas, U.S. Army Fort Hood Archeological Resource Management Series, Report 67, Prepared for Environmental Division, U.S. Army Garrison, Fort Hood by Joseph S. Murphey, Historical Architect, USACE Fort Worth District, June 2018).

At Fort Gordon GA, the SHPO consensus *not eligible* determination is based on Fort Gordon's survey report for 305 Vietnam War Era homes. The report states: "No buildings, structures, or landscapes were recommended for nomination to the NRHP under criteria consideration G for exceptional significance. Further, the 305 family housing buildings, originally constructed between 1966 and 1975, were found to have little integrity remaining and it is the recommendation of this survey that none of the family housing constructed during this time period will become eligible for the NRHP when they reach 50 years of age." (ERDC/CERL SR-05-7, Volume 4, April 2005, Fort Gordon Cold War Architectural Survey, Volume 4: Family Housing Survey Forms, Adam Smith and Sunny Stone, Construction Engineering Research Laboratory Champaign, IL).

At Fort Sill OK, NRHP consensus eligibility determinations were made for 192 total housing units located in their Vietnam War Era Medicine Bluff Heights housing development, Patriot Estates housing development, and Geronimo Acres housing development. In each of these cases, the installation's evaluation states that the housing lacks integrity due to wholesale replacement of windows and doors and addition of non-historic materials to the exterior. The SHPO consensus not eligible determination stated that the housing was not eligible due to significant material alterations to the properties.

Two Army installations have treated Vietnam War Era housing as *eligible* for the NRHP with SHPO concurrence. Fort Campbell (located in both KY and TN) initiated consultation with the TN SHPO in 2020 on emergency interior ceiling repairs for Vietnam War Era housing in the

1963 Stryker Village. The SHPO stated that although Stryker Village had not been fully NRHP evaluated, the housing *could* be eligible for the NRHP and, with the proposed action following the Secretary of the Interior's Standards, would not cause an adverse effect to Stryker Village *if* the housing and neighborhood were to be eligible. Although no final determination of eligibility was made, the emergency repairs were made in accordance with the Secretary of the Interior's Standards, and the installation's *no adverse effect* finding was agreed to by the SHPO – in effect treating the housing as eligible for the NRHP for purposes of emergency repair.

In 2014, Hawthorne Army Depot NV in consultation with the NVSHPO obtained a consensus determination that the Conelly Housing Complex, constructed in 1969, was eligible for inclusion in the NRHP under Criterion A. The Conelly Housing Complex was comprised of 25 duplex housing units, associated buildings and structures, and landscape features, and was determined to be eligible for the NRHP under Criterion A because of association with Vietnam War Era history as manifested at the state and local level. The construction of the Conelly Housing Complex was in response to the addition of a new bomb production line at the ammunition depot. The bomb line was important to support of the Vietnam War, and the housing was required to accommodate the additional military personnel and their families associated with the new line.

The 25 Conelly Housing Complex duplexes were one story, on a concrete foundation, wood framed, and each duplex unit was about 1,434 square feet. The units were built with minimal insulation and had single-pane aluminum slider windows. The 25 duplex housing units comprising the Connelly Housing Complex were not considered to be eligible under NRHP criteria other than Criterion A. Regarding eligibility under Criterion C, the stick built construction method, Contemporary architectural style, and mass-produced materials used in the Conelly Duplex Units were found to be indistinguishable from civilian and military housing constructed in the 1960s and 1970s. Additionally, the alteration of character defining exterior features, such as the board and batten walls and roofline with projecting rafters, had diminished the overall integrity of the housing. The Conelly Duplex Units were not physically distinctive, did not have a high degree of integrity of character defining features, and were considered not eligible under Criterion C.

In consideration of the NRHP eligibility of the Conelly Housing Complex under Criterion A, an adverse effect finding was subsequently made for the proposed demolition of the housing. Demolition of the Conelly Housing Complex included removal of twenty-five one-story contemporary-style duplex buildings built in 1969, asphalt roads, concrete driveways, twenty-five carports, small storage unit buildings, streetlights, and bus stops. A MOA was executed with the SHPO in October 2015, and amended in May 2016. The mitigation measures agreed to were commensurate with the historic property's significance under Criterion A and included oral history interviews with former residents, historic photographs of the housing, architectural inventory forms for the buildings, and information regarding the landscape and location of trees within the complex. The mitigation was completed in July 2016 and the Conelly Housing Complex was subsequently demolished.

## VII. NRHP ELIGIBILITY DETERMINATION FOR ARMY VIETNAM WAR ERA HOUSING

The Program Comment process allows the Army to achieve a broader national perspective on this property type and its significance than individual installations and SHPOs usually possess and account for in their location-specific NRHP evaluations. Additionally, the Army's entire inventory of the Vietnam War Era housing property type will reach 50 years of age during the proposed duration of the Program Comment. Historic properties that are less than 50 years old and previously evaluated against the 36 CFR 60.4(g) NRHP criteria consideration of *exceptional importance* may require reevaluation against the NRHP evaluation criteria at 36 CFR 60.4(a)-(d) once reaching 50 years of age.

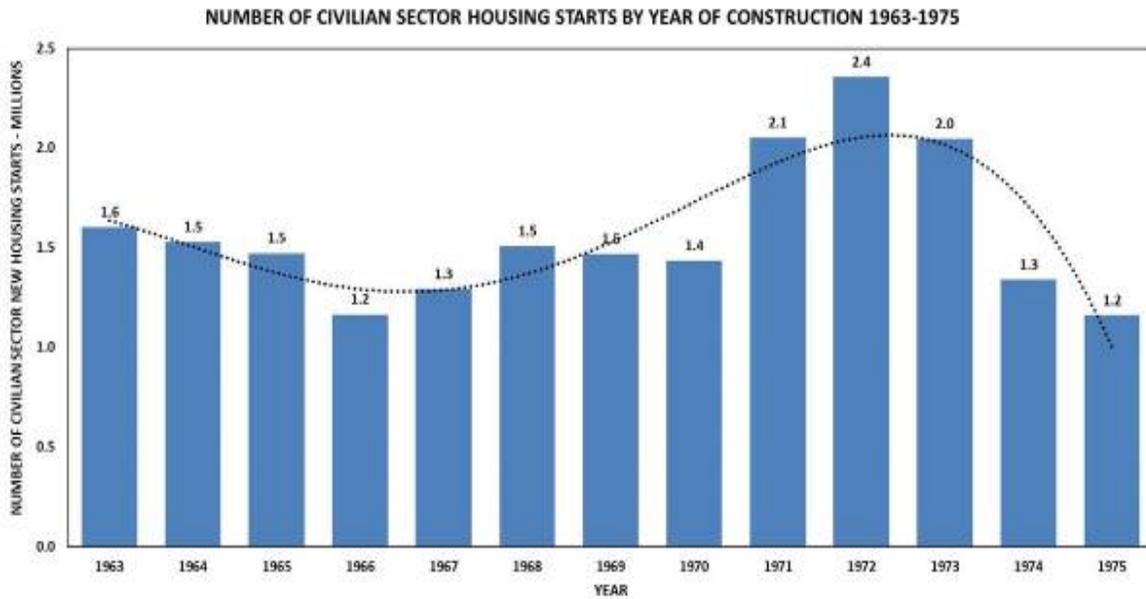
For purposes of the Program Comment, the Army will address Vietnam War Era housing NRHP eligibility, including the housing from 1973-1975, based on the NRHP evaluation criteria at 36 CFR 60.4(a)-(d). The Army will not apply the higher NRHP threshold criteria consideration of *exceptional importance* per 36 CFR 60.4(g) to Vietnam War Era housing. For purposes of the Program Comment, the Army has reviewed the NRHP significance of housing that was less than 50 years old when previously evaluated on a location-specific level and has reconsider the NRHP eligibility of the property type against the NRHP evaluation criteria at 36 CFR 60.4(a)-(d). Subject to the specific considerations in Section VIII, and for the purposes of this Program Comment, the Army considers the Vietnam War Era housing property type to be eligible for the NRHP because it meets the NRHP evaluation criteria at 36 CFR 60.4(a) (Criterion A), due to its association with events that have made a significant contribution to the broad patterns of our history.

The nation-wide framework for the significance of Army Vietnam War Era housing under Criterion A is provided in the *Army Housing Thematic Area* developed in the DoD Vietnam War Era historic context *Vietnam and the Home Front: How DoD Installations Adapted, 1962–1975* (at <https://www.denix.osd.mil/Army-vwehh-pc>). The Vietnam conflict was a major event in American history from the early 1960s through the mid-1970s and had direct implications on military activities on the home front including the Army family housing construction program. The Vietnam conflict significantly increased the Army's warfighting readiness requirement, which in turn lead to an increased in the size of the Army and number of Soldiers and military families. This had a direct effect on the Army family housing program. The Vietnam War and heightened Army warfighting readiness requirements had a significant impact on Army housing construction appropriations and the types and numbers of housing that was built. The *Army Housing Thematic Area* relates that during the Vietnam War, the housing stock at Army installations was overtaxed with the increase in Soldiers. Additionally, a large percentage of family housing deficits were identified for non-commissioned officers (NCOs) and junior officers, who were responsible for troop training.

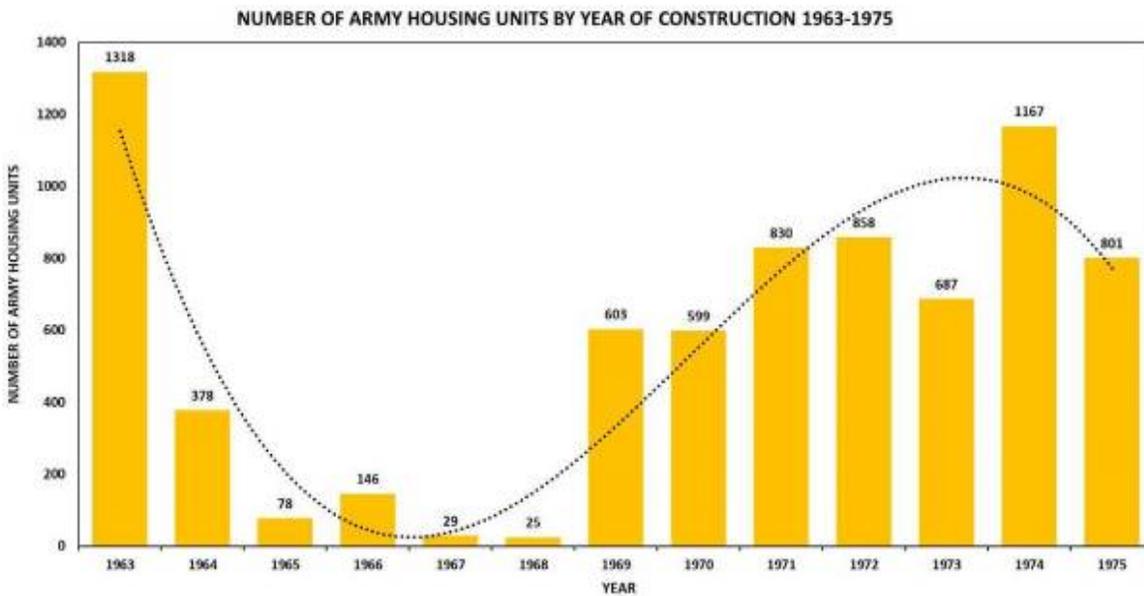
The housing shortages, in the midst of an ongoing military conflict, illustrated the necessity for improvement of the family housing stock as a retention incentive for military personnel with families. Housing was a major consideration of military life and figured importantly as a career incentive. Quality on-post family housing was viewed as a necessity for soldier recruitment and retention to support the warfighting mission. Adequate and reasonably

priced housing was deemed critical for operational unit readiness and individual efficiency and morale. The national housing trend in the private civilian sector during this period indicates that housing constructed during the Vietnam War Era (1963-1975) is ubiquitous across the American landscape. Figure 3 indicates the number of private, civilian sector new housing construction starts in the US from 1963-1975. Civilian sector new housing starts ranged between 1.2 million and 2.4 million new house starts per year, and totaled 20.4 million new housing starts over the 13-year period (<https://www.census.gov/construction/nrc/index.html>). Figure 4 shows the number of extant Army housing units by year constructed during the Vietnam War Era.

**FIGURE 3.**



**FIGURE 4.**



The data in the two charts show some general similarity in that there is a decline in the mid-1960's, and a significant increase in the early 1970's. Civilian sector new housing starts are consistently between 1.2 and 2.4 million new house starts per year over the entire period and do not show the sharp annual increases and decreases indicated by the Army housing data. While effected by national economic conditions, new civilian sector housing starts were not subject to the DoD's war-time policies and the funding priorities in annual Congressional appropriations that directly affected Army housing construction during this period. No DoD funding for construction of family housing was requested in 1967, and that is reflected in the chart showing a very low number of Army housing units from 1967 and 1968. DoD funding appropriations in those years were directed to support the escalation of US military actions in the Vietnam War, and there was a resulting significant decrease in Army housing constructed in those years. There are also other instances where housing funds were deferred or frozen for certain periods of time. It is noted that the number of Army housing units represented in the chart indicate the number of housing units currently in the Army inventory, not the total number of units constructed.

Fort Riley KS, has found that 211 family housing units indicated as built in 1963 in their real property records are actually directly related to the Capehart military housing program that expired in 1962. This housing was entered into Fort Riley's real property inventory in 1963 and is specifically documented in those records as being Capehart program housing. Construction was funded and started in 1962, the final year of the Congressional authorization for the Capehart program, but not completed and entered into the installation's property book until 1963. This is the only known documented instance of this situation. Other installations, such as Fort Sill, have indicated that housing constructed in 1963 was constructed with MCA funds (not Capehart funds), but followed the standard Capehart housing design criteria.

Generally, the design criteria in effect for Army housing in 1963 remained the Capehart criteria established in 1958, focused on single-family and duplex housing, with some apartments also constructed. The Army's family housing program was changed in 1964 when new standardized designs for military family housing were published in a housing design folio: *Department of Defense – Family Housing, Prepared by the Office of the Deputy Assistant Secretary of Defense (Family Housing)* (DoD Design Folio). The new family housing designs in the 1964 DoD Design Folio are dated as approved by the DoD in February 1964, indicating that DoD had contracted with the architects for the new housing designs in 1963, considering the Capehart family housing program expiration in 1962.

The 1964 DoD Design Folio resulted in a new emphasis in the Army family housing program. Single family and duplex housing designs were the standard for Army family housing throughout the previous 100 years of Army standardized family housing design and construction. Beginning with the earliest Army Quartermaster Corp standardized family housing plans developed in the mid-19<sup>th</sup> century, single family and duplex housing for Army families was and remained the Army standard through the 20<sup>th</sup> century as demonstrated by Army Inter-War Era (1919-1940) family housing, and by Capehart and Wherry Army family housing (1949-1962).

The 1964 DoD Design Folio changed the historic emphasis in the Army family housing program with a new focus on design and construction of high density clustered townhouse developments to house Army families. Unlike earlier Army housing programs, Vietnam War

Era housing designed in accordance with the 1964 DoD Design Folio abandoned regional and historical stylistic references, the DoD Design Folio presented Contemporary designs that rejected any historical stylistic references. While the Army had also historically constructed townhouses throughout the twentieth century, and limited numbers of townhouses were constructed under the Capehart program, the focus on townhouse construction increased during the Vietnam War Era as the military struggled to provide housing as efficiently as possible for enlisted personnel and junior officers. Garden apartments were also constructed to provide housing for enlisted and junior officers. The scale of townhouse construction during the Vietnam War Era was significantly greater than in years previous. This shift was in response to the need to provide increasing numbers of housing units for a larger segment of the military population that historically had been excluded from family housing benefits.

Application of the DoD Design Folio for all new military family housing became mandatory on 1 July 1964, and thereafter. The DoD chose Modernists architects recognized for their Modern designs. The designs were prepared for the DoD by four civilian sector architectural firms: A. Quincy Jones and Frederick Emmons, George Matsumoto, Robert A. Little and George F. Dalton, and Keyes, Lethridge & Condon. Jones and Matsumoto had national reputations based on their earlier work in civilian residential and commercial architectural design and planning. Dwellings constructed following Folio design were however, more modest versions in execution and exterior treatment than what was depicted in the DoD Design Folio.

The DoD Design Folio states that the architects' experience in the civilian residential housing field are reflected in the DoD Design Folio plans. The DoD Design Folio provides minimum standards of acceptable design and are intended to provide economies in house and site design and construction. Special attention was given to the design and construction of clustered townhouses for enlisted personnel, NCOs, and junior or company grade officer family housing, these units constituted the greatest part of the military family housing construction program at that time.

The 1964 DoD Design Folio states that DoD objectives dictated the development of a family housing development plan that would provide reduced costs in siting, construction and maintenance. The recognized solution was the clustered townhouse. Multi-story, row-unit townhouses, closely sited within large open areas was recognized as creating the desired economies of scale. The DoD Design Folio states that the townhouse will play a prominent role in the military family housing construction program.

The DoD Design Folio promoted clustered townhouses primarily to minimize development costs. The DoD Design Folio recognizes that economies in townhouse construction are largely obtained by closely grouping the houses to reduce street and utility costs while leaving the remainder of the land in open park areas. The townhouse design guidance provided in the DoD Design Folio states the townhouse community development was intended to provide comfortable and private living conditions with the added advantage of larger park and recreation areas. While it was recognized that the resulting densities would tend to be high, the DoD Design Folio indicates that the intensity of development should be determined individually for each project depending upon the characteristics of the site and the economies to be obtained.

The DoD Design Folio specifies the development of the site should be influenced by the existing topography, and townhouse designs are provided for both flat and sloping sites so that excessive site development costs could be avoided. The design of high-density townhouse units in accordance with the recommendations in the DoD Design Folio were intended to be cost effective, take advantage of the natural topography, and afford open park-like areas.

The USACE received MCA funding for Army family housing construction and functioned as the contracting agent for family housing construction. Based on the 1964 DoD Design Folio, USACE executed contracts with private sector architecture and engineering (A&E) firms to provide site-specific designs and construction of military family housing at individual Army installations. While single family and duplex family housing designs for senior officers were included in the DoD Design Folio and continued to be constructed, townhouse construction on Army installations predominated during the Vietnam War Era. Townhouses represented 61% of military family housing types built in 1965. The townhouses were principally for enlisted personnel and company grade officer family housing, and most of the family housing constructed between 1965 and 1975 was focused on and for those military ranks.

In 1972, the Design Folio was revised with a *DoD Construction Criteria Manual* that established standardized housing unit size and land use intensity criteria, and provided guidance for a variety of indoor and outdoor recreational facilities. The 1972 manual indicates that townhouses continued to be the preferred option for enlisted and company grade personnel along with a select number of apartment buildings; single-unit houses were authorized for majors or equivalent or higher. Buildings constructed after 1972 adopted the forms and designs from the 1964 Folio. Single-story, single-family or duplex units, single-story townhouses, two-story duplexes and townhouses; and apartment buildings were built. Exterior ornamentation was absent. And finally, in 1975, funds were requested to develop new designs for the military family housing constructed thereafter.

In summary, and with reference to the *Army Housing Thematic Area* in the DoD historic context *Vietnam and the Home Front: How DoD Installations Adapted, 1962–1975*, the Army considers Vietnam War Era housing to be eligible for the NRHP under Criterion A for its Army-wide association with the military history of the Vietnam War. The Vietnam War was a major event in American history from the early 1960s through the mid-1970s and its heightened warfighting readiness requirement had direct implications for military activities at installations in the United States, including the Army family housing program.

The Vietnam War had a significant impact on Army housing construction appropriations, influencing the types of housing and housing developments, and numbers of housing units built. Army Vietnam War Era housing history illustrates the continuing progression of Army housing policy and design, as well as the influence of national war-time policies as reflected through the military housing construction program. The expiration of the Capehart housing program in 1962 and the need to attract and retain Soldiers with families, while controlling the costs of new family housing construction, led to development of the new standardized family housing townhouse designs in the 1964 DoD Design Folio. The 1964 Design Folio was further modified in 1972 by the *DoD Construction Criteria Manual* that housing guided design and construction through 1975.

The war-time housing demands and the 1964 DoD Design Folio drove a change in the focus of the Army family housing program from the 100-year-old standard of single family and duplex housing designs found in pre-1919 Army family housing, Army Inter-War Era family housing (1919-1940), and Army Wherry and Capehart Era family housing (1949-1962), to an increased focus on the clustered townhouse type of family housing development. Clustered townhouse developments changed the Army family housing landscape at installations where it was constructed.

The Army family housing program during the Vietnam War Era illustrates the change in focus from a traditional Army emphasis on building single family and duplex housing for Army families. Army Vietnam War Era family housing includes the last vestiges of single family and duplex housing following the Capehart design criteria completed in 1963. While single family and duplex housing continued to be built during the Vietnam War Era for field grade, senior, and general officers following new single family and duplex Contemporary designs in the 1964 DoD Design Folio, townhouses constructed in cluster developments for enlisted personnel and company grade officers numerically predominated Army military family housing construction during this period.

USACE used standardized housing design plans developed by civilian architectural firms for their Army housing construction contracts, and hired A&E firms from the civilian sector to construct the Army family housing at each installation. Army family housing constructed during this period used the same building materials and construction methods that were used in the millions of homes built in the private sector during this period. Army family housing design and townhouse cluster developments also applied and followed the existing trends in community planning and neighborhood design concepts from the civilian sector.

While townhouse construction is a transition for the Army's family housing program, this change within the Army had no significant influence on community planning and development in the private civilian sector. As indicated in the 1964 Design Folio, the DoD housing designs reflect the architects' prior experiences in the civilian residential housing sector, they were using designs and community planning approaches that they had already used outside of the DoD. The Army family housing program followed existing community planning, design, and development trends already present in the civilian sector. Similar private civilian sector housing was constructed by the millions across the country during the Vietnam War Era (1963-1975). Private civilian sector new housing starts totaled 20.4 million over the 13-year Vietnam War Era. Within this nation-wide context, the Army's 7,500 Vietnam War Era housing units are not distinctive rather, they simply followed the existing civilian sector trends in community planning, design, and development.

The Army's Vietnam War Era housing is not considered significant under NRHP criteria other than Criterion A. Regarding Criterion A (Event), the housing program is considered eligible for the NRHP due to its association with events that have made a significant contribution to the broad patterns of our history, specifically its association with the military history of the Vietnam War.

Regarding Criterion B (Person), Army Vietnam War Era housing is not associated with the productive lives of significant architects involved in the DoD Design Folio. While the 1964 Design Folio represents the work of two individual architects with national reputations (Jones and Matsumoto), the building designs in the *Folio* do not have personal associations with these architects as required under the criterion. Historical research to date also has not found any significant associations of this housing with the productive lives of significant military figures or real estate developers from this period.

Regarding Criterion C (Design/Construction), Army Vietnam War Era housing does not represent *distinctive* characteristics of type, period, and method of construction, and is not considered to be eligible for the NRHP under Criterion C. Army family housing constructed during this period is not distinctive since it used the industry standard building materials and construction practices and methods of the time, and its designs and development plans followed the existing design concepts and community planning trends that were already in use for the millions of homes built in the private civilian sector during this period. The housing designs in the 1964 Design Folio were developed by civilian architectural firms who applied standardized housing designs and planning principles they had already been using in the civilian sector. USACE contracted out the housing designs to A&E firms from the civilian sector who used industry standard materials and methods in the construction of the housing. Army Vietnam War Era housing and neighborhoods do not embody any characteristics of type, period, or methods of construction that are distinctive from the millions of similar properties built in the civilian sector during this period. Analysis of the 1964 Design Folio drawings and data provided from installation specific inventories indicates that what was ultimately constructed were modest interpretations of designs presented in the 1964 Design Folio.

With further reference to Criterion C, regardless of building type, virtually all Army Vietnam War Era housing has undergone modification and alteration of character defining features effecting its overall integrity. A comprehensive plan to modify and upgrade the units was undertaken by the Army. These modifications resulted in neighborhood-wide material replacement and design changes. For example, Fort Irwin CA reports that all of their 120 Vietnam War Era housing units were reconstructed “from the slab up” in the 1980s, and Fort Bragg NC reports that all windows have been replaced on all of the 200 Vietnam War Era housing units in Cardinal heights. In other cases, modifications have occurred as a result of ongoing maintenance, material failure and replacement, or for quality of life improvements. Army housing constructed during the Vietnam War Era exhibit similar classes of changes in interior and exterior materials, and in some cases, changes in plan. These changes reflected replacement of original interior and exterior materials. Exterior cosmetic redesigns to meet current stylistic trends also occurred at select installations. Specifically, new exterior ornamentation is present referencing earlier architectural styles, and new exterior window shutters have been installed. Window replacement has been extensive, new replacement windows differed in size, type, and configuration from the originals, changes that altered the original design intent of the building. Many interior modifications included replacement fixtures and tiles in the bathrooms, replacement cabinets and appliances in kitchens, and new flooring throughout. In addition, floor plans of units were reconfigured or units combined to meet current space and size norms. It is noteworthy that the one example of Vietnam War Era housing that was determined to be eligible for the NRHP with SHPO consensus (Hawthorne Army Depot

NV) was determined to be significant under Criterion A for its historical association with the Vietnam War, rather than under Criterion C since it lacked integrity. Overall, this property type does not represent distinctive characteristics of type, period, and method of construction, has had substantial physical modifications impacting its integrity.

The 1964 DoD Design Folio drove change in the Army family housing program to a new focus on increased townhouse construction. While this change was already occurring nationwide, it is significant to the history of the Army family housing program during the Vietnam War Era as addressed under Criterion A. When placed in the national context of housing design and construction in the US during this period, Army Vietnam War Era housing does not represent distinctive examples of this housing design or construction since the Army simply followed the civilian sector in construction materials, methods, design types, and community planning. The housing also does not represent the work of a master, possess high artistic value, or represent a significant and distinguishable entity whose components lack individual distinction. Overall, the housing also lacks integrity due to many alterations and modifications that have occurred over time. The Army believes that this property type does not represent distinctive characteristics of type, period, and method of construction, lacks integrity due to substantial physical modifications, and does not convey significance under Criterion C.

Regarding Criterion D (Information Potential), the housing itself is unlikely to yield information important in history since they do not represent the principle source of information on design or construction technique, and is not considered to be eligible for the NRHP under Criterion D.

## VIII. APPLICATION OF NRHP ELIGIBILITY DETERMINATION

1) Army Vietnam War Era housing that has not been subject to a prior National Register evaluation and consensus determination of eligibility at the installation level is considered to be *eligible* for the NRHP under Criterion A for purposes of this Program Comment, regardless of age. NHPA compliance requirements for those properties will be addressed under the Program Comment, and management actions on those properties will proceed under the Program Comment authority.

2) Army Vietnam War Era housing previously determined *eligible* for the NRHP with SHPO concurrence at the installation level will be treated as *eligible* for purposes of this Program Comment. NHPA compliance requirements for all such properties previously determined *eligible* will be addressed under the Program Comment, and management actions on those *eligible* properties will proceed under the Program Comment authority.

3) Historic properties that are less than 50 years old and evaluated against the 36 CFR 60.4(g) NRHP criteria of exceptional importance at the installation level may require reevaluation against the NRHP evaluation criteria at 36 CFR 60.4(a)-(d) once reaching 50 years of age. From an Army-wide property-type perspective, and considering that all Army Vietnam War Era housing will reach 50 years of age during the proposed duration of this Program Comment, the Army has reviewed the significance of housing that was less than 50 years old when previously evaluated for NRHP eligibility. Based on this review, the Army has reconsider

the NRHP eligibility of such housing against the evaluation criteria at 36 CFR 60.4(a)-(d). Army Vietnam War Era housing that was less than 50 years old at the time of a prior NRHP evaluation, and was determined to be *not eligible* for the NRHP with SHPO concurrence, will be considered to be *eligible* for the NRHP under NRHP Criterion A for purposes of this Program Comment. NHPA compliance requirements for all such properties will be addressed under the Program Comment, and management actions on those properties will proceed under the Program Comment authority.

4) Army Vietnam War Era housing that was 50 years old or older at the time of a prior NRHP evaluation at the installation level, was evaluated under National Register evaluation criteria 36 CFR 60.4(a)-(d), and was determined to be *not eligible* for the NRHP with SHPO concurrence, will remain in a *not eligible* status for purposes of this Program Comment. No further NHPA compliance requirements apply to those properties.

## **IX. POTENTIAL EFFECTS ON HISTORIC PROPERTIES**

The proposed Program Comment management actions (maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, demolition and replacement, lease, transfer, conveyance, and the use of current industry standard building materials and methods in the implementation of management actions) present a potential for adverse effects to Army Vietnam War Era housing, associated buildings and structures, and landscape features.

Vietnam War Era housing is considered eligible for the NRHP under Criterion A due to its association with events that have made a significant contribution to the broad patterns of our history. Implementation of the management actions may: alter or change the properties in a manner that may not be consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68); lease, transfer, or convey the properties out of government ownership; or may otherwise remove properties from the Army's inventory. The Army will implement the mitigation measures in Section X to ensure these effects are taken into account.

## **X. MITIGATION MEASURES AND BENEFITS OF THE PROGRAM COMMENT**

### **MITIGATION MEASURES AND SCHEDULE:**

The Army's proposed Program Comment will include mitigation measures as treatments that the Army will implement to ensure the effects of its management actions are taken into account. The Army's proposed mitigation measures meet the intent of historic preservation as it is defined in the NHPA, and are commensurate with the significance of this housing. The mitigation measures include public education through broad web-based distribution of information and use of social media, in-depth scholarly research on the history and architecture of Vietnam Era housing, additional inventory and documentation of Vietnam War Era housing, the identification and treatment of properties of particular importance, notification to RCI partners regarding historic preservation tax credits, and annual reporting. All mitigation measures are subject to security clearance review requirements, and will be completed and

conclude in 2025, three calendar years from the anticipated 2022 date of the ACHP's formal adoption of the Program Comment.

**Education:** The Army will establish and maintain a website containing information about the history of the Army Vietnam War Era housing for public educational purposes. The Army will provide relevant public documentation regarding Vietnam War Era housing and make that information available via the website, thereby providing the public a single and readily accessible source of information on the history of this housing. The Army will also use social media by means of our DENIXnews twitter account to distribute information on Vietnam War Era historic housing and Army historic preservation.

**Research:** The Army will provide new scholarly information on the history of Vietnam War Era housing. The Army will conduct in-depth professional research and prepare additional Army Vietnam War Era housing historic context information that will be Army-wide/nation-wide in scope. The Army will conduct archival research and assess historical information relevant to the nation-wide historic context of the housing, address architectural styles represented, architects involved in the design of the housing, the history and characteristics of the military construction programs for Vietnam War Era housing, and other important aspects pertaining to the history and architecture of Army Vietnam War Era housing.

**Inventory and Documentation:** This mitigation measure includes the creation of information for Army Vietnam War Era housing based on the conduct of installation-level surveys. The Army will inventory, evaluate, and document representative architectural styles, design elements, associated buildings and structures, and landscape features. For consistency in documentation, the Army will use standardized building inventory forms prepared by a professional historic preservation consultant for this effort. This mitigation measure will provide a set of information for all 22 installations with the Vietnam War Era housing property type.

**Treatment of Properties of Particular Importance:** Through its research, inventory and documentation efforts the Army will, in coordination with the ACHP, seek to identify Vietnam War Era housing that may have particular importance. Properties of particular importance are defined as Army Vietnam War era housing or neighborhoods that are, in the context of the nation-wide inventory of civilian sector housing and neighborhoods from this period, substantially distinctive and unique in their design, method of construction, and building materials used. Additionally, properties of particular importance must exhibit a high degree of integrity with enough significant design characteristics and original historic building materials present and intact to be considered truly distinctive within the nation-wide inventory. For Vietnam War Era housing identified as being of particular importance the Army will, in coordination with the ACHP, consider the need to conduct additional documentation of those properties as a preservation measure and, within funding and mission constraints, consider the preservation of these properties through continued use as military housing. This treatment is based on the precedent set for the treatment of properties of particular importance in the Program Comment for Capehart-Wherry Housing (1949-1963) Section II. b. (4). The long term preservation of Vietnam War Era properties of particular importance will similarly be achieved by identification, additional documentation, and the continuity of historical use of Vietnam War Era housing as housing.

**Tax Credits:** The Army will advise RCI partners that Vietnam War Era housing may be eligible for historic preservation tax credits.

**Annual Reporting:** On or before September 30th of each reporting year, the Army will provide an Annual Report to the ACHP. The Annual Report will provide the status of the Army's implementation of the mitigation measures. The Annual Report will also include a summary review of decisions made for housing demolition; any known future demolition proposals; significant issues or misunderstandings that may have arisen in the course of applying the Program Comment, how those were addressed, and how they may be avoided in the future; and an assessment of the overall effectiveness of the Program Comment in meeting its intent and purpose. Subsequent to its submission of the Annual Report and upon the ACHP's request, the Army will attend a meeting with the ACHP and ACHP invitees to discuss implementation of the Program Comment.

### **BENEFITS OF THE PROGRAM COMMENT:**

1) More Consistent and Value-added Preservation Outcomes: As indicated in Section VI., previous Section 106 project-by-project reviews of Vietnam War Era and determinations of NRHP eligibility are not consistent among installations and SHPOs for these similar property types, and have resulted in inconsistent preservation outcomes. The Program Comment delivers the appropriate Army-wide perspective to address this class of related property types. It provides a determination of significance based on research that is at an appropriate Army-wide scale and viewpoint, and affords more consistent and value-added treatment, mitigations, and preservation outcomes relative to the current project-by-project review process.

2) Improved Quality of Life, Health and Safety for Military Families: The ability to execute the *management actions* in a more efficient, consistent, and cost effective manner under the Program Comment directly improves the quality of life, health, and safety of the Army families living in Vietnam War Era housing. Additionally, the use of current industry standard building materials eliminates the health and safety risks associated with lead-based paint and other hazards found in historic building materials in this era housing and provides cost efficiencies for building materials.

3) Historic and Architectural Character Documented: The Army inventory a sample of Vietnam War Era housing from installations nation-wide to document examples of Vietnam War Era housing, associated buildings and structures, and landscape features creates a more complete information set. The Army will also identify and any Vietnam War Era housing of particular importance and may further document that housing.

4) Historical Use Continued as a Mission Asset: The ability to implement management actions in a more cost effective, timely and consistent manner under the Program Comment will help ensure that this historic housing remains a viable mission asset and continues its historic function as housing.

5) Contribution to Scholarship: New in-depth research on the history and architecture of American housing will be made available to academic researchers and the general public and

provide a significant contribution to historic preservation scholarship for this historic property type that has not been broadly researched on a nation-wide basis.

6) Identification and Preservation of Properties of Particular Importance: The long term preservation of Vietnam War Era properties of particular importance will be achieved by identification, additional documentation, and the continuity of historical use of Vietnam War Era housing as housing.

7) Public Education: The interested public will benefit from the historic preservation education materials that will be made available by the Army through its website and through social media.

## **XI. APPLICABILITY OF THE PROGRAM COMMENT**

The proposed Program Comment will apply to all privatized and non-privatized Army Vietnam War Era housing, associated buildings and structures, and landscape features. There are no Army Vietnam War Era historic housing, associated buildings and structures, and landscape features that have been determined to be National Historic Landmarks (NHL), or that are believed to qualify for NHL designation. The following are exceptions to applicability of the proposed Program Comment:

1) The proposed Program Comment would not apply to Vietnam War Era housing at Fort Meade MD. The historic housing at Fort Meade is subject to a Deed of Easement dated 27 March 2003, between Mead Communities LLC and the Maryland Historical Trust. The Fort Meade Deed of Easement will continue to operate in accordance with applicable state and local laws. The Fort Meade housing is the Army's only historic housing subject to a Deed of Easement.

2) The proposed Program Comment would not apply to Vietnam War Era housing that was 50 years old or older at the time of a prior NRHP evaluation at the installation level, was evaluated under National Register evaluation criteria 36 CFR 60.4(a)-(d), and determined to be not eligible for the NRHP with SHPO concurrence. It is acknowledged that no further NHPA compliance requirements apply to these properties.

3) The proposed Program Comment would not apply when management actions may cause damage, physical destruction, or change in the physical features of all or any part of the following: NRHP eligible archeological sites and properties of traditional religious and cultural importance to Federally-recognized Indian tribes or Native Hawaiian Organizations; human remains and cultural items including funerary objects, sacred objects, and objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act; and Indian Sacred Sites as defined in Executive Order 13007.

## **XII. IMPLEMENTATION OF THE PROGRAM COMMENT**

The proposed Program Comment will be implemented at all Army installations with privatized and non-privatized Vietnam War Era housing, and in consideration of relevant

specific exceptions to applicability stated in Section XI. The Army will implement the proposed Program Comment management actions in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7. The Program Comment will supersede and replace the requirements in Army installation level Programmatic Agreements (PAs) and MOAs for Army Vietnam War Era housing, associated buildings and structures, and landscape features. The Army will implement the proposed Program Comment in lieu of all PA or MOA requirements and procedures previously applicable to Army Vietnam War Era housing, associated buildings and structures, landscape features, and neighborhoods.

This approach to Program Comment implementation is based on established ACHP precedent, it is identical to the implementation statement approved and adopted by the ACHP in the Army's Program Comment for Army Inter-War Era Housing Section 2.2.7. The precedent was established after ACHP Office of General Council review of the statement for the Program Comment for Army Inter-War Era housing.

To further clarify Program Comment implementation; existing Section 106 agreements are not voided, all other property types addressed in existing agreements remain under the terms of those agreements. The Program Comment will simply replace the requirements in existing agreements that are applicable to Army Vietnam War Era housing with the requirements of the Program Comment. Additionally, and as needed, installation level NHPA agreements can be updated to reflect the Program Comment and its effect on management of the Vietnam War Era housing property type.

The Army will also implement the Program Comment in lieu of any procedures, development agreements, lease and conveyance documents, environmental management plans, guidelines, reporting requirements, Cultural Resources Management Plans, and all other installation documents, standards, procedures, or guidelines pertaining to the preservation and management of Vietnam War Era housing, associated buildings and structures, and landscape features.

The Army will not implement any further historic property identification, evaluation, documentation, or mitigation efforts in connection with Vietnam War Era housing and the management actions covered by the Program Comment other than the efforts that are specified in this Program Comment. The Army's Vietnam War Era housing is adequately identified, evaluated, and documented by existing information and by information that will be developed under the Program Comment mitigation measures.

Army Vietnam War Era housing areas are the equivalent of urban / suburban housing development tracts in the civilian sector. As such, there is significant prior ground disturbance in Vietnam War Era housing areas resulting from the construction the housing including overall grading of the entire development sites, housing construction, construction of associated buildings and structures, road and sidewalk construction, installation of above and below ground utilities, landscaping, construction of recreational structures, and subsequent ground disturbing actions that have occurred after the original construction. Such areas of extensive ground disturbance associated with housing tract development are generally considered to have a low probability for the presence of NRHP eligible archeological properties. No further efforts to

identify or address archeological properties or other historic properties will be conducted in connection with the implementation of Program Comment management actions other than those specified in the Program Comment as follows:

If any management actions implemented under this Program Comment may cause damage, physical destruction, or change in the physical features of all or any part of a known NRHP eligible archeological site or property of traditional religious and cultural importance to Federally-recognized Indian tribes or Native Hawaiian Organizations, those effects will be addressed following the procedures in 36 CFR 800.3 - 800.7, or by following procedures in an applicable installation PA. The unanticipated discovery of a NRHP eligible archeological property or human remains during the implementation of management actions for Vietnam War Era housing will be addressed following the procedures in 36 CFR 800.3 - 800.7, or by following the unanticipated discovery procedures in an applicable installation PA, and / or by following the compliance procedures of the Native American Graves Protection and Repatriation Act, as appropriate.

### **XIII. EFFECT AND DURATION OF THE PROGRAM COMMENT**

The effect of the Program Comment is to provide Army compliance with the NHPA 54 USC 306108 (Section 106) for the management actions occurring on its inventory of Vietnam War Era housing by means of the procedures under 36 CFR 800.14(e), in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7. By adhering to the terms of the Program Comment, the Army will meet its responsibilities for compliance with Section 106 of the NHPA for management actions associated with Vietnam War Era housing, associated buildings and structures, neighborhoods, and landscape features. All mitigation measures will be completed and conclude within three calendar years of the date of the ACHP's formal adoption of the Program Comment.

The Program Comment is proposed to remain in effect for 33 years from the date of issuance (anticipated in 2022) through 2055 unless, prior to that time, the Army determines that such comments are no longer needed and notifies the ACHP in writing, or the ACHP withdraws the Program Comment in accordance with 36 CFR 800.14(e)(6). Following such withdrawal, the Army will be required to comply with Section 106 through the process in 36 CFR 800.3 - 800.7, or an applicable program alternative under 36 CFR 800.14, for each individual undertaking formerly covered by this Program Comment. During the first six months of the 32nd year after issuance of this Program Comment, the Army and the ACHP will meet to determine whether to consider an extension to its term.

The 33-year effective period for the proposed Program Comment coincides with the term of the ground leases that have been executed with the Army's privatized housing partners under the RCI program. Upon termination of the ground lease, ownership of all RCI partnership owned improvements including all housing that is located within the boundaries of the ground lease is automatically conveyed back to the Army. Over 99% of Army's Vietnam War Era housing is operated under RCI.

#### **XIV. DEFINITIONS**

The following definitions apply for the purposes of the Program Comment and its implementation:

*Abatement* means actions to eliminate, lessen, reduce, or remove hazardous and toxic materials, and unsafe conditions.

*Army Vietnam War Era housing* means all privatized and non-privatized housing, with construction started or completed during the period 1963-1975, that is located on an Army installation or joint base and owned, operated, and or managed by the Army or by an Army privatized housing partner including those operating under the RCI program. The terms *Army Vietnam War Era housing* and *Vietnam War Era housing* are used interchangeably in the Program Comment and mean all Army Vietnam War Era housing, associated buildings and structures, neighborhoods, and landscape features.

*Army Vietnam War Era housing property type* means Army Vietnam War Era housing, associated buildings and structures, landscapes and landscape features, and Vietnam War Era neighborhoods.

*Army Vietnam War Era neighborhood* means a defined geographical area, district, development, subdivision, or locality on an installation that is characterized by and comprised predominantly of Army Vietnam War Era housing, associated buildings and structures, and landscape features.

*Associated buildings and structures* means detached garages, carports, storage buildings, above and below ground utilities and systems including water, sewage, storm water, mechanical and electrical systems, tennis courts, pools, buildings and structures associated with athletic activities, playgrounds and equipment, all other recreational buildings and structures, fencing, community centers, shelters, associated ancillary facilities that support housing operations, and any and all other buildings, structures, and objects associated with Army Vietnam War Era housing and neighborhoods.

*Cease maintenance* means an action to permanently halt maintenance and repair of housing and /or associated buildings and structures and landscape features when: the property is no longer in a mission supporting operational status; resources are and will remain unavailable to maintain, mothball, or demolish the property; and there is no foreseeable alternative use or intent to bring the property back to operational status at a future time.

*Current industry standard building materials and methods* means building materials and methods that are currently in use in the construction industry today. It includes natural, composite, and synthetic building materials. It does not mean buildings materials or methods original to and used at the time of construction Vietnam War Era housing, nor does it mean building materials similar to original historic building materials that have been used in the past to replace the original historic building materials.

*Demolition and demolish* mean partial or complete dismantling or destruction of existing Vietnam War Era housing, associated buildings and structures, and landscape features that are deteriorated, vacant, or underutilized, or present health hazards or unsafe conditions for occupants. Demolition may include: interior demolition to remove interior portions including removal of walls, ceilings, and mechanical systems while maintaining the exterior; selective demolition to remove specific interior or exterior portions of housing, associated buildings and structures, and landscape features while maintaining other portions or features; and complete demolition to remove Vietnam War Era housing, associated buildings and structures, or landscape features in their entirety.

*Historic property* means buildings, sites, structures, objects, and districts that are eligible for inclusion or that are included in the NRHP.

*Landscapes and landscape features* means the overall design and layout of the Vietnam War Era housing communities including roadway circulation systems and patterns, plantings and landscaping, open spaces, playgrounds, recreational features including but not limited to athletic fields, fencing, parking areas, signage, site furnishings, parade grounds, lighting, sidewalks and curbing, driveways, setbacks, viewsheds into Vietnam War Era historic properties and districts and out from Vietnam War Era historic properties and districts into other historic properties and districts, and any and all other landscape features associated with Vietnam War Era housing and neighborhoods.

*Lease, transfer, and conveyance* means the execution of lease, transfer and conveyance documents for the purposes of possession, management, operation, and transfer of Vietnam War Era housing. Includes transfers and conveyances of existing ground leases and property ownership between RCI partners and by the Army; and actions to transfer or convey excess Vietnam War Era housing by sale or other means out of Army or RCI partner ownership and control.

*Maintenance and repair* means activities required to maintain buildings, building systems (such as heating and ventilation, plumbing, and electrical systems), building fixtures, and other building features or materials in an operational state, or to bring them back to operating condition by repair or replacement of broken, damaged, or deteriorated elements of building systems, fixtures, materials, and features.

*Management actions* means maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of current readily available industry standard building materials and methods in the implementation of management actions.

*Mitigation measures* means any existing, new, or updated materials or actions that serve to address, reduce, minimize, or otherwise mitigate adverse effects on historic properties, and may include research reports, historical documentation, recordation, and other materials and activities.

*Mothballing* means an action to close up and deactivate housing and /or associated buildings and structures for a long period, with the intent that the property would be brought back to a mission supporting operational status at a future time.

*New construction* means the use of current industry standard building materials and methods for construction of new housing, associated buildings and structures, and landscape features within existing Vietnam War Era housing neighborhoods. New construction within existing Vietnam War Era housing neighborhoods may or may not occur in the immediate area of demolished Vietnam War Era housing, associated buildings and structures, and landscape features, and may or may not be similar in design and layout to existing Vietnam War Era housing and neighborhoods.

*Original historic building materials* means the actual building materials that were used in the initial construction of Vietnam War Era housing.

*Privatized housing* means Army housing that has been privatized under the Army's Residential Communities Initiative (RCI). The RCI operates on Army installations through the operation of legal partnerships between the Army and private sector developers. At each installation where RCI housing is located, the Army conveys ownership of existing housing and leases land to the RCI partnership. The RCI partnership then operates and manages the conveyed housing and leased lands for military housing purposes.

*Properties of particular importance* means Army Vietnam War era housing or neighborhoods that are, in the context of the nation-wide inventory of civilian sector housing and neighborhoods from this period, substantially distinctive and unique in their design, method of construction, and building materials used. Additionally, properties of particular importance must exhibit a high degree of integrity with enough significant design characteristics and original historic building materials present and intact to be considered truly distinctive within the nation-wide inventory.

*Public educational materials* means Vietnam War Era housing historic contexts, reports, and other documentation containing public information on the historical development of Vietnam War Era housing.

*Quality of Life* means the general wellbeing and material living conditions of individuals and military families living in historic housing.

*Rehabilitation* means repairs, additions, and other alterations and modifications to a building that preserve, to the greatest extent possible, historic building materials, historic building design, and other historic building features in accordance with Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 68).

*Renovation* means improvements to housing including: alterations; modifications; additions that increase the square footage; interior floor plan changes; actions to improve energy efficiency and climate resiliency; large scale replacement of out of date, damaged, deteriorated, or defective building systems and materials; partial demolition; and other alterations that modernize housing to improve the quality of life of residents.

*Viewshed* means all of the area visible from a particular location, viewing point, or series of viewing points. Includes all surrounding points that are in the line of sight from a particular location, viewing point, or series of viewing points. Excludes all points and locations that are not visible and/or are obstructed by terrain, other natural features, man-made features, and points beyond the horizon.

## **XV. ARMY VIETNAM WAR ERA HOUSING PHOTOGRAPHIC EXAMPLES**

This section includes photographic examples of Army Vietnam War Era housing from installations across the country. The housing photographs are ordered chronologically, with the specific installation and date of construction identified. The photographs were selected to show the range of single family, duplex, multiplex, and townhouses constructed during the Vietnam War Era. The standardized designs in the 1964 DoD Design Folio, and detailed descriptions of Vietnam War Era housing from several Army installations may be found on the Army Vietnam War Era housing website <https://www.denix.osd.mil/Army-vwehh-pc>.



Fort Riley KS – Constructed 1963



Fort Campbell, TN – Constructed 1963



Fort Detrick, MD – Constructed 1965



Fort Gordon, GA – Constructed 1966



Fort Benning, GA – Constructed 1969



Fort Carson, CO – Constructed 1970



Fort Carson, CO – Constructed 1971



Fort Jackson, SC – Constructed 1972



Fort Shafter, HI – Constructed 1973



Fort Bragg, NC – Constructed 1974-1975



Fort Benning, GA – Constructed 1975

## **XVI. PUBLIC REVIEW OF THE PROGRAM COMMENT PLAN**

### **PUBLIC REVIEW PROCESS:**

The Army initiated public participation, in accordance with 36 CFR 800.14(e)(2), in its development of the Program Comment by publication of a NOA in the Federal Register on 15 November 2021. The Federal Register NOA (86 FR 63003) informed the public of the Army's intention to seek a Program Comment for Vietnam War Era housing from the ACHP and provided a draft Army Program Comment Plan, dated 8 November 2021, for a 30-day public review and comment period.

The Army FPO also reached out directly via email to over 850 NHPA stakeholders including the ACHP; all SHPOs, THPOs, and Federally-recognized tribes; Native Hawaiian Organizations; and members of the interested public including representatives from the NTHP, NATHPO, NCSHPO, and HHF to ensure awareness of the Federal Register notice and the opportunity to review the Army Program Comment Plan. Additionally, the Army announced the Federal Register notice and availability of the Army Program Comment Plan for public review on social media via Twitter.

The Army received a total of 11 comments on the Program Comment Plan from one Federally-recognized Indian tribe (Choctaw), seven SHPOs (AL, CO, MO, OK, SC, TX, and VA), and three non-governmental preservation organizations (NTHP, HHF and NCSHPO). The comments are summarized below. All comments have been included in the Army's administrative record. The Army has taken into account the public comments received and has finalized the Program Comment Plan. This final Program Comment Plan, dated 28 December 2021, will be used to guide and inform the Army's stakeholder consultation phase of Program Comment development (see Section II). All of the topics addressed below and included in this Program Comment Plan will be subject to further consultation during the stakeholder consultation phase of Program Comment development occurring from January 2022 through June 2022.

### **PUBLIC COMMENTS SUMMARY AND RESPONSE:**

Public comments on the draft Army Program Comment Plan dated 8 November 2021 generally fall into the following categories of recurring comments: 1) Ground disturbing activities and the inadvertent discovery of archeological sites and Native American human remains, 2) Eligibility of properties that were less than 50 years old when previously evaluated, 3) Conduct of additional historic research and inventory of Vietnam War Era housing, 4) Determination of NRHP eligibility with reference to NRHP Criterion C, 5) The category of undertakings defined as management actions, 6) The process for determination of Properties of Particular Importance, 7) Annual or periodic reporting on implementation of the Program Comment, and 8) The relationship of the Program Comment to existing Section 106 compliance agreements.

1) Commenters inquired about how ground disturbing activities and the inadvertent discovery of archeological sites and Native American human remains and would be addressed.

These topics are addressed in the Program Comment Plan, Section XII Implementation. If any management actions implemented under this Program Comment may cause damage, physical destruction, or change in the physical features of all or any part of a known NRHP eligible archeological site or property of traditional religious and cultural importance to Federally-recognized Indian tribes or Native Hawaiian Organizations, those effects will be addressed following the procedures in 36 CFR 800.3 - 800.7, or by following procedures in an applicable installation PA. The unanticipated discovery of a NRHP eligible archeological property or human remains during the implementation of management actions for Vietnam War Era housing will be addressed following the procedures in 36 CFR 800.3 - 800.7, or by following the unanticipated discovery procedures in an applicable installation PA, and / or by following the compliance procedures of the Native American Graves Protection and Repatriation Act, as appropriate.

2) Commenters indicated that properties that were less than 50 years old when evaluated against the 36 CFR 60.4(g) NRHP criteria of exceptional importance may require reevaluation, and requested that the Army reassess the NRHP eligibility of those properties. The Army agrees. In response to these comments, and considering that all Army Vietnam War Era housing will reach 50 years of age during the proposed duration of this Program Comment, the Army has conducted further review, has reassessed those properties, and has revised its determination of NRHP eligibility for those properties. That reassessment is included in this revised Program Comment Plan, Section VIII. Army Vietnam War Era housing that was less than 50 years old at the time of a prior NRHP evaluation and was determined to be not eligible for the NRHP with SHPO concurrence, will be considered to be eligible for the NRHP under NRHP Criterion A for purposes of this Program Comment. Additionally, as also indicated in Section VIII, Army Vietnam War Era housing that has not been subject to a prior NRHP evaluation and consensus determination of eligibility at the installation level is also considered to be eligible for the NRHP, regardless of age.

Army Vietnam War Era housing that was 50 years old or older at the time of a prior NRHP evaluation, was evaluated under National Register evaluation criteria 36 CFR 60.4(a)-(d), and was determined to be not eligible for the NRHP with SHPO concurrence, will remain in a not eligible status for purposes of this Program Comment. No further NHPA compliance requirements apply to those properties.

3) Commenters requested that the Army conduct additional historic context research, and additional inventory and evaluation of Vietnam War Era housing before the Program Comment is submitted to the ACHP in order to further evaluate NRHP eligibility. The Army agrees. During the stakeholder consultation phase of Program Comment development, the Army will provide additional historic context research and inventory and evaluation of Vietnam War Era housing for additional installations. Also in response to these comments, the Army has provided further information in Section VI and VII from existing sources pertinent to the inventory and evaluation of the property type, and has posted several installation-specific inventory and evaluation reports and an applicable historic context report on the Program Comment website. Section X. Mitigation Measures, has also been revised to indicate that the Army intends to provide inventory, evaluation and documentation of Vietnam War Era housing at all of the 22 Army installations where the property type is present.

4) Commenters requested that the Army revisit its determination of NRHP eligibility of the property type with reference to NRHP Criterion C. The Army conducted the requested reassessment in response to these comments based on consideration of additional information. With reference to Criterion C, the Army has now added significant additional information in Section VII of this Plan. The additional information indicates that Army Vietnam War Era housing is not eligible for the NRHP under Criterion C. Army Vietnam War Era housing and neighborhoods do not embody any characteristics of type, period, or methods of construction that are distinctive from the millions of similar properties built in the civilian sector during this period. Further, virtually all Army Vietnam War Era housing has been subject to interior and exterior modifications. Army Vietnam War Era housing has undergone continuous modification and alteration, and overall lacks integrity since it has lost many characteristic physical features. This information is detailed in the additional information provided in Section VI and Section VII, and can also be found in the installation reports that are referenced and that are located on the Program Comment website. It is noteworthy that the one example of Vietnam War Era housing that was determined to be eligible for the NRHP with SHPO consensus (Hawthorne Army Depot NV) was determined to be significant under Criterion A for its historical association with the Vietnam War, rather than under Criterion C since it lacked integrity. Overall, the Army believes that this property type does not represent distinctive characteristics of type, period, and method of construction, nearly all have had substantial modifications and the lack integrity, and do not convey significance under Criterion C.

5) Commenters believe the category of undertakings, defined as “management actions,” is too broad and oppose the inclusion of demolition, new construction, cessation of maintenance, or lease, transfer or conveyance as management actions. The category of undertakings defined as “management actions” is based on both the Army’s needs, and on the precedent set by the ACHP in their approval of two other Program Comments for Army family housing. The management actions as defined in this Plan are nearly identical to the management actions defined, approved and adopted by the ACHP in the Army’s Program Comment for Army Capehart and Wherry Era family housing approved by the ACHP in 2002, and the Program Comment for Army Inter-War Era family housing approved by the ACHP in 2020. All of the management actions defined in this Plan are necessary to improve the quality of life, health and safety of families living in historic Vietnam War-era housing.

6) Commenters identified the lack of criteria to identify properties of particular importance, expressed concern with the process for determination of properties of particular importance, and also expressed a desire for long-term preservation of such properties. The Army has taken these comment into consideration and has significantly revised Section X, Properties of Particular Importance. Properties of particular importance are now defined with more specific criteria: Properties of particular importance are Army Vietnam War era housing or neighborhoods that, within the context of the nation-wide inventory of civilian sector housing and neighborhoods from this period, are considered to be substantially distinctive and unique in their design, method of construction, and building materials used. Additionally, properties of particular importance must exhibit a high degree of integrity with enough significant design characteristics and original historic building materials present and intact to be considered truly distinctive within the nation-wide inventory.

The identification and treatment of properties of particular importance now includes coordination with the ACHP at each step in the process. For Vietnam War Era housing that are identified (in coordination with the ACHP) as having particular importance the Program Comment Plan has been revised to state that the Army will, in further coordination with the ACHP, consider the need to conduct additional documentation of those properties as a preservation measure and, within funding and mission constraints, consider the preservation of these properties through continued use as military housing. This treatment measure is based on the precedent set for the treatment of properties of particular importance in Section II. b. (4) of the Program Comment for Capehart-Wherry Housing (1949-1963). The long term preservation of Vietnam War Era properties of particular importance will similarly be achieved by the identification, additional documentation, and the continuity of historical use of Vietnam War Era housing as housing. The Army will also advise RCI partners that Vietnam War Era housing may be eligible for historic preservation tax credits. It is also noted that there is no Army Vietnam War Era housing that has been determined to be a NHL, or that is believed to qualify for NHL designation.

7) Commenters requested that annual or periodic reporting on implementation of the Program Comment be incorporated into the Program Comment. The Army agrees and has incorporate annual reporting into the Program Comment Plan in Section X as a mitigation measure.

8) Commenters indicated that they believe the Program Comment should not void existing installation-level NHPA Section 106 agreements (MOAs, PAs). The Program Comment Plan addresses the effect of the Program Comment on existing Section 106 agreement documents in Section XII, Implementation of the Program Comment. All existing Section 106 agreements remain in place; none are voided by the Program Comment. The Program Comment will simply replace the requirements in existing agreements applicable to Army Vietnam War Era housing with the requirements of the Program Comment. Existing Section 106 agreements are not voided, all other property types addressed in existing agreements remain under the terms of those agreements. Additionally, and as needed, installation level NHPA agreements can be updated to reflect applicable Program Comments and their effect on management of certain historic property types. This approach to implementation is based on established ACHP precedent, the language in Section XII is identical to the implementation statement approved and adopted by the ACHP in the Army's Program Comment for Army Inter-War Era housing.

The precedent was established after ACHP Office of General Council review of the statement for the Program Comment for Army Inter-War Era housing. The statement is in accordance with the effect of Program Comments as stated in 36 CFR 800.14(e), and the ACHP's Program Comment guidance. According to the ACHP, the primary benefit of a Program Comment is that it allows a federal agency such as the Army to comply with Section 106 in a single Program Comment by addressing a class of undertaking and entire category of property type, rather than addressing each undertaking as an individual action as do existing installation level agreements. Program Comments allow the Army to manage the many repetitive management actions occurring on this large inventory of Vietnam War Era housing in a more efficient and cost effective manner with more consistent nation-wide preservation outcomes commensurate with significance of the property type.