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**Program Comment for
Vietnam War Era Historic Army Housing
(1963-1975): National Register Eligibility
and Potential Effects**

**30 Mar 2022
Stakeholder Consultation Briefing**



PROGRAM COMMENT FOR ARMY VIETNAM WAR ERA HISTORIC HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES*

NATIONAL REGISTER ELIGIBILITY AND POTENTIAL EFFECTS BRIEFING AGENDA:

- RESPONSE TO PUBLIC REVIEW OF THE PROGRAM COMMENT PLAN FOR ARMY VIETNAM WAR ERA HOUSING
- NATIONAL REGISTER OF HISTORIC PLACES SIGNIFICANCE - ARMY VIETNAM WAR ERA HOUSING
- SPECIFIC CONSIDERATIONS FOR PRIOR AND SUBSEQUENT DETERMINATIONS OF NRHP ELIGIBILITY
- POTENTIAL EFFECTS ON ARMY VIETNAM WAR ERA HOUSING
- BACK-UP INFORMATION

* Additional information on Department of the Army Historic Preservation and Cultural Resources, and the *Army Cultural Resources Story Map*: <https://www.denix.osd.mil/army-cr/home/>

* Additional information on the Program Comment for Vietnam War Era Historic Army Housing: <https://www.denix.osd.mil/Army-vwehh-pc>.



RESPONSE TO PUBLIC REVIEW OF THE PROGRAM COMMENT PLAN FOR ARMY VIETNAM WAR ERA HOUSING

- The Army initiated public participation, in accordance with 36 CFR 800.14(e)(2), in its development of the proposed Program Comment by publication of a Notice of Availability (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 final Program Comment Plan was issued on 28 December 2021.
- In order to further evaluate National Register of Historic Places (NRHP) eligibility, public comments on the Program Comment Plan 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.
 - The Army agreed and has now provided a new Historic Context and an additional Inventory and Evaluation of Vietnam War Era housing at ten Army installations on the Program Comment website <https://www.denix.osd.mil/Army-vwehh-pc>.
 - In response to the public comments the Army also provided further installation-specific information in Section VI and VII of the Final Program Comment Plan pertinent to the inventory and evaluation of the property type and has posted the installation-specific inventory and NRHP evaluation reports on the website.
 - The DoD-wide historic context for the Vietnam War Era defining in the *Army Housing Thematic Area* is also posted on the website.



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Program Comment for Vietnam War Era Historic Army Housing



RESPONSE TO PUBLIC REVIEW OF THE PROGRAM COMMENT PLAN FOR ARMY VIETNAM WAR ERA HOUSING (cont.)

- Public commenters requested that the Army re-evaluate its determination of NRHP eligibility of the property type with reference to NRHP Criterion C and the additional information.
 - The Army agreed and conducted the requested reassessment in response to these comments based on consideration of both additional existing information and the information now provided in the new Army historic context and inventory and evaluation reports for this housing.
 - The new and additional information indicates that Army Vietnam War Era housing is not eligible for the NRHP under Criterion C. With reference to Criterion C, the Army has now added significant additional information in Section VII of the Final Program Comment Plan.
 - Additional details regarding the reassessment of NRHP eligibility are provided herein.



NATIONAL REGISTER SIGNIFICANCE ARMY VIETNAM WAR ERA HOUSING

- The Program Comment process allows the Army to achieve a broader national perspective on a property type and its significance than local installations possess and account for in their project specific compliance actions.
- Local Army installation-level project compliance actions have resulted in eligibility determinations and preservation outcomes for the Army's Vietnam War era housing property type that are not consistent. 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 preservation outcomes.
- Since the Army's 7,519 units of Vietnam War era housing will all reach 50 years of age during the proposed duration of the Program Comment, the Army will address Vietnam War era housing NRHP eligibility, including the housing from 1973-1975, in terms of the NRHP evaluation criteria at 36 CFR 60.4(a-d). The Army has determined that it will not apply the higher threshold criterion of exceptional importance per 36 CFR 60.4(g) for the 2,655 units of Vietnam War era housing from 1973-1975 that are less than 50 years old.
- For the purposes of the Program Comment, the Army considers its inventory of Vietnam War era housing to be eligible for the National Register of Historic Places (NRHP) under 36 CFR 60.4(a) (Criterion A) because of its association with Vietnam War military history.



NATIONAL REGISTER SIGNIFICANCE OF ARMY VIETNAM WAR ERA HOUSING **(cont.)**

- **National Register Evaluation under Criterion A (Event)**
 - The Vietnam War was a major event in American history from the early 1960s through the mid-1970s and had direct implications for military activities at installations in the United States.
 - The Vietnam conflict significantly increased the Army's warfighting readiness requirement, which in turn led to an increase 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 requirement had a significant impact on Army housing construction appropriations and the types and numbers of housing that was built.
 - 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 new family housing townhouse designs in the 1964 DoD Design Folio.
 - Army Vietnam War era housing 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.



NATIONAL REGISTER SIGNIFICANCE OF ARMY VIETNAM WAR ERA HOUSING (cont.)

- **National Register Evaluation under Criterion B (Person)**
 - Army Vietnam War era housing is not directly associated with the productive lives of significant architects involved in the DoD Design Folio.
 - While the 1964 DoD Design Folio represents the work of certain individual architects with national and regional reputations, the buildings constructed do not have the direct personal association with those architects as required under the criterion. The US Army Corps of Engineers hired civilian architectural and engineering firms to provide site specific designs and build the housing at each installation. The housing constructed at each installation were redesigned, stripped down versions of what is depicted in the DoD Design Folio, and have no direct personal association with the architects whose plans appear in the DoD Design Folio.
 - Historical research to date also has not found any significant associations of this housing with the productive lives of significant military figures from this period.
- **National Register Evaluation under Criterion D (Information Potential)**
 - The housing itself is unlikely to yield information important in history.
 - The housing does not represent the principal source of information on design or construction methods and techniques, and is not considered to be eligible for the NRHP under Criterion D.



NATIONAL REGISTER SIGNIFICANCE OF ARMY VIETNAM WAR ERA HOUSING (cont.)

- **National Register Evaluation under Criterion C (Design/Construction).** As indicated in the historic context for Army Vietnam War Era housing, this property type does not represent distinctive characteristics of type, period, and method of construction, does not represent the work of a master, does not possess high artistic value, is not a significant and distinguishable entity relative the nation-wide inventory, does not retain a high degree of integrity, and is not considered eligible for the NRHP under Criterion C:
 - Army family housing constructed during this period is not distinctive or distinguishable: industry standard building materials, construction practices, methods and designs were used, and community developments followed the existing design concepts that were in common use in the 20+ million 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 construction to regional and local Architect/Engineering firms from the civilian sector for site-specific design and construction of the housing. What was ultimately constructed were modest stripped-down versions of the designs presented in the 1964 Design Folio.
 - The 1964 DoD Design Folio drove change in the Army family housing program to a greater focus on townhouse construction. This change was occurring nation-wide, and it is considered significant to the history of the Army family housing program during the Vietnam War era under Criterion A.
 - When viewed in the national context of housing design and construction in the US during this period, the Army Vietnam War era housing property type does not represent distinctive examples of design or construction since the Army 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.



NATIONAL REGISTER SIGNIFICANCE OF ARMY VIETNAM WAR ERA HOUSING (cont.)

- **Integrity:** As indicated in the historic context for Army Vietnam War Era housing, this property type does not retain many historic materials or physical exterior and interior features that were once characteristic of the property type. The property type overall lacks integrity of design and construction due to many extensive alterations and modifications that have occurred over time.
 - A comprehensive plan to modify and upgrade the units was undertaken by the Army in the 1980s. These modifications resulted in neighborhood-wide material replacement and design changes. In other cases, modifications occurred as a result of selective material failure and replacement. In this instance, all were not subject to the same degree and type of modification.
 - Army housing constructed during the Vietnam War era exhibit similar changes in interior and exterior materials, and in some cases, changes in overall floorplans. These changes reflected replacement materials due to wear, abatement, and/or failure of original interior and exterior materials. Exterior cosmetic redesigns occurred at select installations. New exterior ornamentation is present referencing earlier (pre-Vietnam War Era) architectural styles. Large numbers of new replacement windows were installed and often differed in size, type, and configuration from the originals, altering 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 were combined to meet current space and size norms.
 - Entire Army Vietnam War era neighborhoods have also been subject to selective or wholesale demolition.



SPECIFIC CONSIDERATIONS FOR PRIOR AND SUBSEQUENT DETERMINATIONS OF NRHP ELIGIBILITY

- Army Vietnam War era housing that has not been subject to a prior National Register evaluation and consensus determination of eligibility under 36 CFR 60.4 will be considered *eligible* for the NRHP under Criterion A for purposes of the Program Comment, regardless of age.
- Army Vietnam War era housing previously determined *eligible* for the NRHP with SHPO concurrence will continue to be considered *eligible* for purposes of the Program Comment, regardless of age.
- Historic properties that were less than 50 years old when evaluated under 36 CFR 60.4(g) NRHP criteria of exceptional importance generally require re-evaluation against the NRHP evaluation criteria at 36 CFR 60.4(a)-(d) once reaching 50 years of age.
 - Considering that all Army Vietnam War Era housing will reach 50 years of age during the proposed duration of the Program Comment, the Army has reviewed and reassessed the significance of housing that was less than 50 years old when previously evaluated.
 - 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 *eligible* for the NRHP under Criterion A for the purposes of the Program Comment.
- 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. There are no currently known instances of this situation.



POTENTIAL EFFECTS ON ARMY VIETNAM WAR ERA HOUSING

- The *management actions* to be addressed in the Program Comment (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. The Army's 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); may lease, transfer, or convey the properties out of government ownership; or may otherwise remove properties from the Army's inventory through demolition.
- The Army plans to conduct specific mitigation measures to ensure these effects are considered.



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BACK-UP INFORMATION



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GOAL AND OBJECTIVE OF THE PROGRAM COMMENT

- GOAL:

The Army's goal for the Program Comment is to obtain programmatic compliance with NHPA 54 USC 306108 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 800.4 through 800.7.

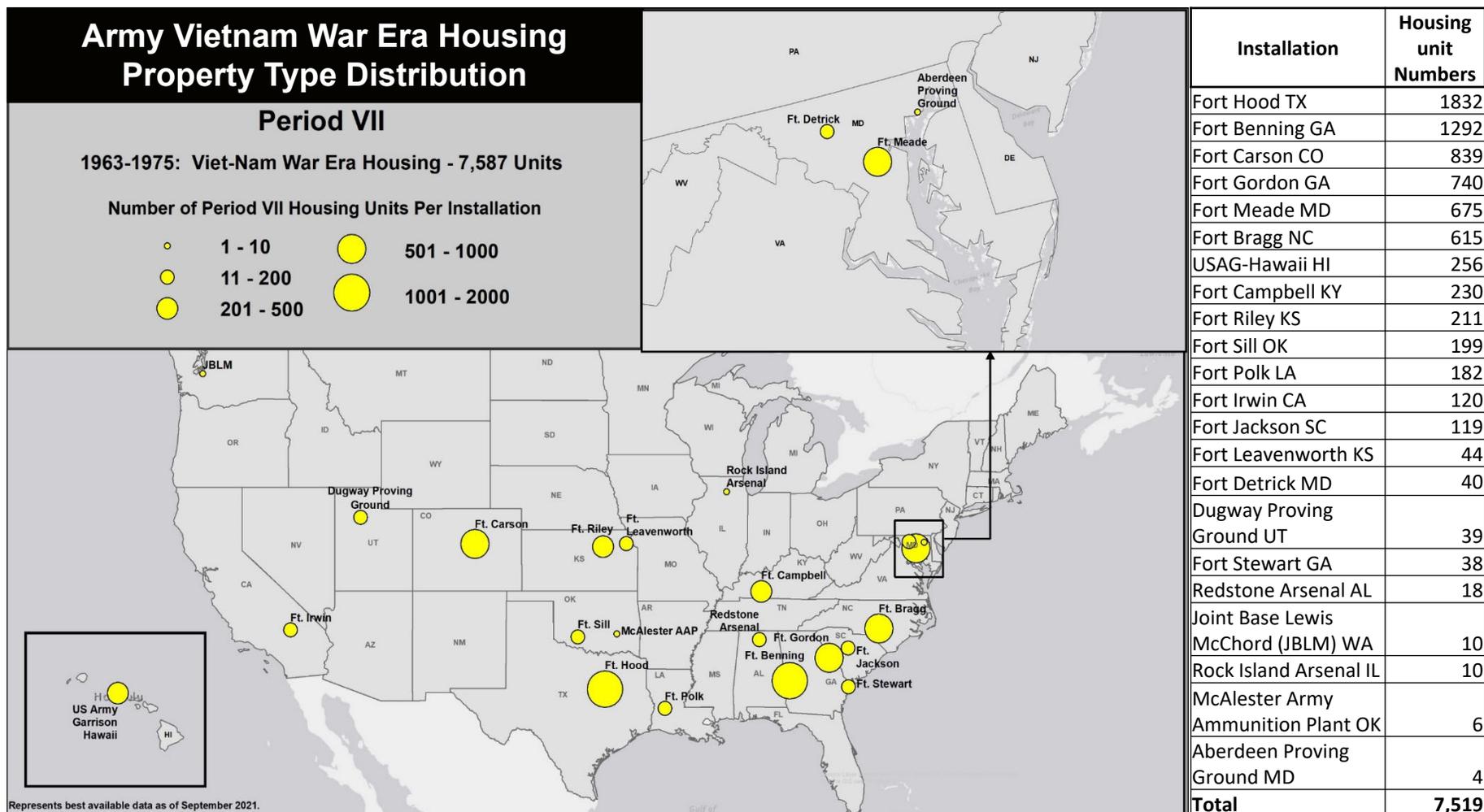
- OBJECTIVE:

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 mitigation measures and management actions.



ARMY VIETNAM WAR ERA HOUSING PROPERTY TYPE DISTRIBUTION





PROGRAM COMMENT DEVELOPMENT PROCESS

