



2025 ANNUAL REPORT

PROGRAM COMMENT FOR DEPARTMENT OF THE ARMY VIETNAM ERA HISTORIC HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES (1963-1975)

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INTRODUCTION

The Army's real property is a vital component of its national defense mission, and many of the buildings and structures constructed by the Army over its 250-year history are now historic properties. Among those historic properties, historic housing is a significant concern; it is a large part of the Army's total housing inventory, is critical to the readiness mission and well-being of thousands of Soldiers and their families, and it requires extensive financial resources and process time for compliance with NHPA Section 106 and 36 CFR 800.

The Army has a unique and significant challenge among federal agencies in managing NHPA Section 106 compliance for its inventory of historic housing. The Army manages the largest inventory of historic housing in the federal government with over 30,000 historic homes currently over 50 years old and subject to NHPA Section 106 requirements. The Army's historic housing inventory includes examples that span from the early 19th century through the modern historic housing of the late 20th century that is the subject of this Program Comment. The Army's historic housing represents a diverse inventory of American domestic architectural styles with highly varied levels of architectural integrity and historic significance. The Army will have an additional 70,000 modern historic homes added to its historic housing inventory over the next 50 years and will in this century have an unprecedented total of over 100,000 historic homes subject to NHPA Section 106 requirements.

This Program Comment for Department of the Army (Army) Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963–1975) (Program Comment) provides the Army with an alternative means to comply with NHPA Section 106 regarding the category of undertakings termed *management actions* for its inventory of Vietnam War Era housing, associated buildings and structures, landscapes, and landscape features.

The Army has over 7,800 historic homes constructed during the 13-year Vietnam War Era from 1963-1975. Management actions required for this housing include maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of modern, readily available industry standard building materials and methods in the implementation of management actions.

1.0 Need for the Program Comment

The need for this Program Comment was found in the Army's obligation to provide safe, healthy, quality housing to Soldiers and their families, and the unique challenges the Army has in managing NHPA Section 106 compliance for its large and growing inventory of historic housing. In 2019, the Secretary of the Army declared an Army Housing Crisis due primarily to widespread deficiencies and significant quality of life, health, and safety issues affecting military families living in historic Army housing.

To address the Army Housing Crisis and meet its housing obligations to military families, the Army must implement management actions to improve Army Vietnam War Era housing conditions affecting the quality of life for Soldiers and their families; address the health and safety risks from certain hazardous historic building materials; ensure cost efficient, effective, and consistent management of the overall inventory; implement climate adaptations and use modern resilient materials; and improve the NHPA Section 106 compliance process times for actions intended to preserve Vietnam War Era housing.

Housing and associated living conditions are critical factors for military families in the context of the challenges and stressors that Soldiers and their families must cope with in their daily lives. A direct connection exists between poor housing conditions and military readiness. Concerns among service members about poor housing conditions have been found to make it difficult to focus on the military mission. Some service members are leaving the military because of poor housing conditions, and the issue is also impacting the ability to recruit new service members (GAO Report 20-281, Military Housing, March 2020).

Housing during the Vietnam War Era was constructed with single-pane windows, asbestos containing shingles and siding, minimal wall and attic insulation, galvanized steel pipes for water supply, cast iron drainpipes, 100-amp circuit breakers, obsolete HVAC components, and lead-based paint and asbestos containing building materials. Most original building materials in Army Vietnam War Era housing have been replaced. The housing is smaller, and floorplans are obsolete relative to the modern standards expected by military families. While improvements to Army Vietnam War Era housing have been made in the past, many requirements remain, and continue to arise, creating the continuous need for implementation of the management actions addressed in this Program Comment.

The Army also has the need to lease, transfer, or convey Vietnam War Era housing to facilitate housing operations by its housing privatization partners under the Army's Residential Communities Initiative (RCI). RCI operates under Army authority on Army installations nationwide through legal partnerships between the Army and private sector developers. Lease, transfer, and conveyance involves the execution of lease, transfer, and other conveyance documents for the purposes of transfer of Vietnam War Era housing to and between RCI partners, between RCI partners and the Army, and out of RCI partner or government ownership.



Vietnam Era Housing units with in-kind roof replacement at Fort Bragg (Goodwin 2025)

The Army must holistically manage its total inventory of Vietnam War Era housing to make certain the housing is preserved and maintained as a viable real property asset into the future. Managers of large inventories of real property understand that total inventory management includes the recurring need to, at times, cease maintenance and demolish certain properties that are no longer viable real property assets. For Army Vietnam War Era housing, cessation of maintenance and demolition are inventory management tools that reduce the excessive costs associated with maintaining certain homes that are no longer viable real property assets. The resulting cost savings are reinvested to maintain and preserve the remaining housing inventory as viable property assets. Cessation of maintenance and demolition may be required for certain Army Vietnam War Era housing when deterioration affects the structural integrity of homes, the habitability of homes, or the quality of life of military family occupants; when the homes are no longer needed, stand vacant and are expected to remain vacant into the foreseeable future;

where hazardous materials and unsafe conditions exist that could affect the health and safety of occupants; and when new replacement housing is needed to improve the overall quality of life for military families. The majority of Program Comments issued by the ACHP over the past 20 years recognize the necessity for and include demolition as an accepted inventory management tool.

2.0 Intent of the Program Comment

This Program Comment is intended to support Army compliance with NHPA Section 106 for the management actions occurring on all privatized and non-privatized Army housing, associated buildings and structures, and landscape features constructed from 1963 through and including 1975. Management actions will be implemented under this Program Comment in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7, with an exception provided in section 5.2.4.3 regarding the treatment of properties of particular importance in Hawaii.

The Program Comment identifies mitigation measures for the management of the Army's Vietnam War Era housing. The Program Comment mandates annual reporting on those mitigation measures. The mitigation measures subject to reporting are:

- Prior Mitigation Measures
- Public Education on the History of Army Vietnam War Era Housing
- Historic Context Research for Army Vietnam War Era Housing
- Army-wide Vietnam War Era Housing Inventory and Evaluation
- Designation of Properties of Particular Importance
- Recordation and Documentation of Properties of Particular Importance
- Treatment of Properties of Particular Importance
- Neighborhood Design Guidelines
- Historic Preservation Tax Credits, and
- Annual Meeting.

2.1 Prior Mitigation Measures

The Army has existing documentation on the history and historic context of Vietnam War Era housing, installation-specific inventory and evaluation reports of Vietnam War Era housing recording its design and architectural style, interior designs and floorplans, factors influencing design variations, and its associated buildings and structures, and landscape features. This existing set of prior Army documentation

serves as a Program Comment mitigation measure since it provides comprehensive documentation and recordation of Vietnam War Era housing, associated buildings and structures, and landscape features. The existing documentation for Army Vietnam War Era housing is consolidated on the Army's Vietnam War Era Housing website <https://www.denix.osd.mil/army-vwehh-pc>.

The prior documentation includes the overarching DoD-wide historic context *Vietnam and the Home Front: How DoD Installations Adapted, 1962–1975*, June 2014; the *Department of Defense Housing Design Folio*, 1964; *Fort Gordon Cold War Architectural Survey*, April 2005; *Architectural Survey Conelly Duplex Units, Hawthorne Army Depot, NV*, September 2014; and *Architectural Inventory and Evaluation of 1970s-Era Family Housing at U.S. Army Garrison Fort Carson, CO*, August 2019.

2.2 Public Education on the History of Army Vietnam War Era Housing

The Army maintains a public website containing information about the history of the Army Vietnam War Era housing for public educational purposes. Relevant public documentation regarding Vietnam War Era housing is available via the website. The Army also uses social media to distribute information on Vietnam War Era historic housing and other Army historic preservation information.

2.3 Historic Context Research for Army Vietnam War Era Housing

New scholarly information on the history of Vietnam War Era housing through in-depth professional research and presentation of additional Army Vietnam War Era housing historic context information was developed by the Army for this Program Comment. The Army conducted archival research and assessed historical information relevant to the nation-wide historic context of the housing and addressed the history and characteristics of the military construction program for Vietnam War Era housing and other important aspects pertaining to the history of Army Vietnam War Era housing in the context of the Vietnam War. The two-volume historic context documentation entitled *Historic Context for Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)* is published on the Army's Vietnam War Era Housing public website <https://www.denix.osd.mil/army-vwehh-pc>.

2.4 Army-Wide Vietnam War Era Housing Inventory and Evaluation

An Army-wide inventory and evaluation of Vietnam War Era housing was developed by the Army for the Program Comment. This included the inventory of representative Vietnam War Era housing architectural styles, associated buildings and structures, and landscape features, and information and evaluation of the housing's location, design, setting, materials, workmanship, and feeling. The report also provided the identification and evaluation of properties of particular importance. The documentation is published on the Army's Vietnam War Era Housing public website <https://www.denix.osd.mil/army-vwehh-pc> as part of the two-volume historic context document.

2.5 Designation of Properties of Particular Importance

Army Vietnam War Era housing properties of particular importance are defined as: Army Vietnam War Era housing that retains a high degree of integrity, represents particularly important historical aspects of the Army Vietnam War Era housing program, and that represent particularly important building types or methods of construction. To be considered properties of particular importance Army Vietnam War Era housing must retain original location, scale, mass, proportion, materials, and ornamentation from the period of construction.

A total of 555 Army Vietnam War Era homes equivalent to 7.1% of the total Army inventory of 7,843 Vietnam War Era homes are designated as properties of particular importance. The 555 Army Vietnam War Era homes designated as properties of particular importance are in the Akolea, Aloala, and Ralston neighborhoods, at Schofield Barracks, Hawaii (HI).

Unlike all other Army installations with Vietnam War Era housing, the housing in these three neighborhoods at Schofield Barracks has had minimal modifications in terms of materials, additions, and new construction. This housing has not undergone the significant redesign or extensive replacement of original building materials and ornamentation that has occurred throughout the rest of the Army inventory of Vietnam War Era housing. The original building designs and building materials such as jalousie windows and concrete block and wood board-and-batten siding are retained, and roof modifications are minimal. Interior modifications are also minimal to maintain the livability of the units and consist of replacement finishes, fixtures, and appliances. In select cases, some housing units were combined, and those original interior floor plans were modified.



Schofield Barracks Vietnam Era Housing (Goodwin 2025)

Despite some minimal modifications over time, Army Vietnam War Era housing in the Akolea, Aloala, and Ralston neighborhoods retains sufficient integrity of association, feeling, location, and setting to convey their historical association with the Vietnam War. The buildings retain a degree of integrity of design, materials, and workmanship. The housing is however not distinctive or distinguishable in its design and construction relative to the national inventory of housing from this period. Additionally, research has not identified any association with persons important in the past, and the housing is unlikely to yield information important to history because it is not the principal source of information representing housing constructed during the Vietnam War Era.

The inventory conducted at Schofield Barracks confirmed that the military followed civilian-sector housing trends and did not construct housing that was unique or distinctive from the 20 million civilian sector homes constructed in the US during this period. Through the retention of original building materials and design, the housing in the Aloala, Akolea, and Ralston neighborhoods maintains the domestic design principles popularized during the period. The Vietnam War Era housing in the Aloala, Akolea, and Ralston neighborhoods retains original location, scale, mass, proportion, materials, and ornamentation from the period of construction. The neighborhood designs are cohesive and visually convey original suburban residential design from the Vietnam War Era. Therefore, the 555 Army Vietnam War era homes located in the Akolea, Aloala, and Ralston neighborhoods at Schofield Barracks, HI,

meet the definition of properties of particular importance under the Program Comment.

2.6 Recordation and Documentation of Properties of Particular Importance

The Army has recorded and documented the designated properties of particular importance. The recordation and documentation included site-specific archival research of primary and secondary source materials and review of previous studies to develop a specific history and statement of significance for the designated properties of particular importance at Schofield Barracks. Research included a review of drawings, historic photographs, and written documents, as available. Fieldwork investigations documented the current appearance of the buildings with digital images of individual building types including elevations and exterior details of the housing. The digital photographs followed National Park Service digital photography standards and showed the respective housing in context. The documentation of the designated properties of particular importance is published on the Army's Vietnam War Era housing website <https://www.denix.osd.mil/army-vwehh-pc/> in the two-volume historic context document.

2.7 Treatment of Properties of Particular Importance

Inventory management requirements for Army Vietnam War Era housing may necessitate the cessation of maintenance and demolition of properties of particular importance designated in section 5.2.4.1 of the Program Comment. The Army will follow the consultation process in 36 CFR 800.6 - 800.7 to address adverse effects when designated Vietnam War Era housing properties of particular importance are proposed for cessation of maintenance and demolition. Memoranda of Agreement (MOAs) or Programmatic Agreements (PAs) prepared in accordance with 36 CFR 800 to resolve the adverse effects of cessation of maintenance and demolition on the designated properties of particular importance are subject to the following requirements of this Program Comment: a) properties of particular importance have been identified, evaluated, and designated under this Program Comment and no further actions under 36 CFR 800 or any MOA or PA shall be stipulated or required to identify, evaluate, or designate additional Army Vietnam War Era housing properties of particular importance and, b) the documentation of properties of particular importance prepared in section 5.2.4.2 of the Program Comment will be incorporated as a mitigation measure in any MOA or PA prepared to address cessation of maintenance and demolition of Army Vietnam War Era housing properties of particular importance. The procedures in this section for treatment of

properties of particular importance apply over the duration of this Program Comment.

2.8 Neighborhood Design Guidelines

The Army prepared Army Vietnam War Era Housing Neighborhood Design Guidelines in coordination with the ACHP. A qualified professional was used to prepare the Neighborhood Design Guidelines. The design and setting of Vietnam War Era neighborhoods and landscape features were addressed in the Neighborhood Design Guidelines. The Neighborhood Design Guidelines are available to those installations with Vietnam War Era housing. The Neighborhood Design Guidelines are beginning to be introduced and utilized to the maximum extent practicable in planning management actions that affect the overall design of Vietnam War Era neighborhoods.

2.9 Historic Preservation Tax Credits

The Army FPO advised its Residential Communities Initiative (RCI) privatized housing partners that Vietnam War Era housing may be eligible for federal and state historic preservation tax credits pursuant to the ACHP issuance of this Program Comment. Information on federal tax credits may be found in 36 CFR 67 Historic Preservation Certifications under the Internal Revenue Code. Additional information may be



Fort Benning Vietnam Era Housing (Goodwin 2025)

found at the National Park Service Historic Preservation Tax Incentives web page located at <https://www.nps.gov/subjects/taxincentives/index.htm>, and at the Internal Revenue Service web page located at <https://www.irs.gov/business/small-businesses-self-employed/rehabilitation-tax-credit-real-estate-tax-tips>. In addition to the federal tax credit, individual states may offer similar state-level tax incentive programs; information on these programs may be obtained from the relevant State Historic Preservation offices. The Army FPO will provide supplemental tax credit information on request from RCI housing partners including offices and website locations that provide information on applicable tax credits. No requests for historic tax credit information for Vietnam War era housing were received during 2025.

2.10 Annual Meeting

After its submission of the 2025 Annual Report and upon the ACHP's request, the Army will schedule a meeting with the ACHP and invite the National Conference of State Historic Preservation Officers (NCSHPO), the National Association of Tribal Historic Preservation Officers (NATHPO), the National Trust for Historic Preservation (NTHP), and any other ACHP identified invitees to discuss implementation of the Program Comment. Prior to the Annual Meeting, the Army will provide the 2025 Annual Report on the Vietnam War Era Housing Program Comment to the meeting invitees. The Annual Meeting will provide an opportunity for attendees to provide their views on the overall effectiveness of the Program Comment in meeting its intent and purpose. The Army will document the occurrence of the meeting and participants, and its response to recommendations made by the ACHP.

2.11 Site Specific Support

Site visits to installations were undertaken in 2025 to overview the Program Comment and to provide technical assistance in its application. During the 2025 United States federal government shutdown, Goodwin & Associates, Inc. (Goodwin) identified any remaining site visits that could be completed remotely. Installations in which there was a small amount of housing subject to the Program Comment present, that had been visited in-person in recent years or had not previously had any major concerns or proposed projects regarding the Program Comments were deemed viable for remote meetings. All installations were given the option of an in-person site visit and three ultimately preferred a remote meeting: Fort Carson, Fort Hood and Presidio of Monterey. In-person and remote visits included

a discussion of proposed and current projects affecting Vietnam-Era housing on the post while utilizing the Program Comment. A survey of selected projects completed during the year and photographs of selected housing units were compiled during each in-person visit. Photographs were provided by the historic housing partner for any remote visits. The following provides additional details from several installation site assistance visits during the reporting period with important information bearing on the annual report. The following table shows a summary site visits in the 2025 reporting year.

Installation	State	Number of housing units	Date visited	Visit type
Fort Benning	GA	1292	November 12	In-person
USAG Hawaii	HI	256	December 12	In-person
Fort Bragg	NC	615	December 4	In-person
Fort Sill	OK	199	June 24	In-person
Fort Meade	MD	675	August 13	In-person
Fort Riley	KS	211	July 11	In-person
Fort Leavenworth	KS	44	July 8	In-person
Presidio of Monterey	CA	156	November 10	Virtual
Fort Hood	TX	156	December 12	Virtual
Fort Carson	CO	839	November 18	Virtual

Presidio of Monterey, California

During the 2025 government shutdown, Goodwin arranged a virtual meeting with The Michaels Organization (TMO) the installation's privatized housing partner. The purpose was to discuss the Program Comment for Vietnam War Era Housing and its application to projects at the Presidio of Monterey. In the meeting, TMO reported that it has no ongoing projects or upcoming projects that will affect its Vietnam War era housing units at the Presidio of Monterey for the upcoming year.

USAG Hawaii, Hawaii

During a meeting at USAG Hawaii on December 9, Goodwin and Centinel, the installation's privatized housing partner, reviewed the Program Comment for Vietnam War Era Housing. Bryan Flower, Centinel's Historic Preservation Program Director, noted that previous plans to demolish 390 units, which have been under discussion since 2020, are now on hold. These units are designated as "properties of particular importance" in the Program Comment. After initial consultations, Centinel and the garrison are re-evaluating the demolition and exploring rehabilitation options in accordance with the Program Comment.

Fort Benning, Georgia

On November 12, Goodwin met with representatives of The Michaels Organization, the housing partner at Fort Benning to discuss recent and potential future work on historic housing units. TMO's Asset Manager noted that he has been implementing the Program Comment for several years. He stated that as of 2025, Fort Benning is in a sustainment period with no immediate plans to modify or upgrade its Vietnam War Era housing.

Fort Bragg, North Carolina

On December 4, Goodwin met with representatives from Corvias, the historic housing partner at Fort Bragg. The meeting included a review of the Program Comment, and hard copy materials were provided to the housing partner and Army housing representatives. *The Senior Vice President of Asset Management for Corvias* gave an overview of improvements in two Vietnam Era neighborhoods, Ardennes and Bataan. These improvements included in-kind asphalt shingle roof replacements on 56 units in the Ardennes neighborhood and on all units in the Bataan neighborhood.



Vietnam Era in-kind roof replacement at Bataan, Fort Bragg, before (left) and after (right), Corvias

Fort Sill, Oklahoma

On June 24, Goodwin met with Corvias, the historic housing partner at Fort Sill, to review the Program Comment and discuss upcoming projects. The housing partner is planning to replace their Geothermal units in some of their Vietnam War Era units. The Geothermal units are planned be in-kind replacements; however, some units may need deeper wells (roughly two feet) as they originally were not dug deep enough. No other upcoming projects are planned.

Fort Meade, Maryland

On August 13, Goodwin staff met with Corvias, Fort Meade's historic housing partner, to review upcoming projects. The discussion covered planned interior renovations for Vietnam War Era housing, including kitchen and bathroom upgrades, with no changes to the existing floor plans or exteriors. In addition to the housing updates, geothermal projects have been approved for the installation. The team also addressed the status of building 3018A, which Corvias is considering for demolition due to recent fire damage.

Fort Riley, Kansas

On July 11th, Goodwin staff met with Corvias, Fort Riley's historic housing partner, to review projects affecting the installation's Vietnam War Era housing. The discussion covered recently completed, ongoing, and upcoming work. Ten Vietnam War Era housing units have been demolished. No other projects are currently planned for the installation.

Fort Leavenworth, Kansas

On July 8th, Goodwin staff met with the Michaels Organization, Fort Leavenworth's historic housing partner, to review upcoming projects. Since switching general contractors in January 2025, the partner has developed a master list of specifications to ensure consistent standards across all renovations. Properties are now divided into four tiers: Tier 1 residences will receive full renovations, Tier 2 will undergo mid-level renovations, Tier 3 properties will be taken offline, and Tier 4 will be demolished. For the Vietnam War Era residences, several upgrades are planned. HVAC systems will be improved, and a budget of \$3 to \$4 million has been allocated for window replacements, which will be installed on an as-needed basis.

Fort Hood, Texas

Goodwin arranged a virtual meeting on November 11th to discuss projects at Fort Hood. The meeting was held during the site visit to USAG Hawaii, as Bryan Flower of Centinel oversees the housing portfolios for both installations. The discussion focused on the ongoing demolition of Vietnam War Era housing in the Camanche I, II, and III neighborhoods, which were constructed between 1970 and 1974.

Fort Carson, Colorado

During the 2025 government shutdown, Goodwin conducted a virtual meeting with Balfour Beatty, Fort Carson's housing partner, to discuss the Program Comment for

Vietnam War Era Housing. Mr. McIntire confirmed that while routine maintenance like painting is performed on an as-needed basis, there are no major ongoing or upcoming projects planned that will affect the installation's Vietnam War Era housing units.

3.0 Summary Review

There have been no major or significant issues or misunderstandings that have arisen in the course of applying the Program Comment during the 2025 reporting period. Regarding the overall effectiveness of the Program Comment, Army commands, installations, and housing privatization partners indicate this Program Comment is fully meeting its intent and purpose and will continue to successfully balance historic preservation requirements with the well-being of the thousands of military families who live in this historic housing.

In the coming year, it is expected that a number of management actions involving the demolition and cessation of maintenance will be required for Vietnam War Era housing at multiple locations. The Army is confident that our implementation of the extensive Program Comment training program, and our sustained professional assistance, technical support, oversight, and monitoring will ensure that the historic and architectural character of the housing is maintained while implementing actions under the Program Comment that improve the quality of life and overall material living conditions of our military families.

Implementation of the Program Comment is proceeding well and meeting the objectives of the document. No problems have been encountered and no amendments to the Program Comment are required or anticipated at this time.