



2020 ANNUAL REPORT

DEPARTMENT OF THE ARMY PROGRAM COMMENT FOR INTER-WAR ERA HISTORIC HOUSING, ASSOCIATED BUILDINGS AND STRUCTURES, AND LANDSCAPE FEATURES (1919-1940)

Submitted by:

**Department of the Army Federal Preservation Officer, Office of the
Assistant Secretary of the Army for Installations, Energy and
Environment**

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I. Introduction

The Army is faced with the extraordinary requirement of managing the largest inventory of historic housing in the federal government. The Army has an obligation to preserve historic housing in compliance with the National Historic Preservation Act (NHPA), but that must occur in balance with the overall well-being of the Soldiers and their families who live in this housing. The Army's obligation to military families in the context of this large inventory of historic housing presents unique and significant challenges.

The Army must provide quality of life for Soldiers and their families; manage high maintenance, repair, and rehabilitation costs for historic housing; address historic building materials that present lead-based paint, asbestos, and other health hazards to housing occupants; address the need for additional bedrooms and expanded living space, kitchen and bathroom improvements, modernization of heating and ventilation systems, and modernization of plumbing and electrical systems; and must rapidly repair and turn around homes for reassigned military families; all while preserving the historic and architectural character of the housing. The magnitude of this challenge requires the Army implement its historic preservation compliance actions in new and innovative ways. The Department of the Army Program Comment for Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940) (Program Comment) was developed in partnership with the Advisory Council on Historic Preservation to meet this uniquely Army challenge.

The Program Comment establishes procedures and requirements that address the Army's NHPA compliance requirements for its nation-wide inventory of over 3,200 Inter-War Era housing units. It successfully balances historic preservation requirements with the well-being of thousands of military families who live in this historic housing. The management actions addressed by this Program Comment directly improve the material living conditions and the quality of life, health, and safety of the Army's Soldiers and families who live in Inter-War Era housing, while the treatment measures ensure the historic and architectural character of this housing is preserved.

The Program Comment was formally adopted by the Advisory Council on Historic Preservation (ACHP) on 4 September 2020, and establishes a new paradigm for integration of historic preservation as part of the solution to the Army's most critical military family housing concerns.

The 2020 Annual Report:

The 2020 Annual Report is provided in fulfillment of Section 5.1 of the Program Comment. The 2020 Program Comment reporting period began with the issuance of the Program Comment by the ACHP on 4 September 2020 through 31 December 2020. This Annual Report summarizes actions undertaken by the Department of the Army (Army) in 2020 for the implementation of the Program Comment. These actions include treatment measures specified in the Program Comment.

The Program Comment defined treatment measures for management actions applicable to Army housing, associated buildings and structures, and landscape features constructed during the

Inter-War Era (1919-1940). The management actions addressed include: maintenance, repair, rehabilitation, renovation, abatement, mothballing, demolition, replacement construction, new construction, and lease and conveyance of Inter-War Era properties. The Program Comment supersedes and replaces installation Programmatic Agreements, Memoranda of Agreement, and any procedures, development agreements, lease and conveyance documents, environmental management plans, guidelines, reporting requirements, Integrated Cultural Resources Management Plans, and any and all other installation documents, standards, procedures, or guidelines pertaining to the preservation and management of Army Inter-War Era housing, associated buildings and structures, and landscape features. The Program Comment applies to all Army Inter-War Era housing, including privatized housing managed under the Army's Residential Communities initiative, and housing that remains Army-managed family housing, with exceptions noted.

The Program Comment mandates annual reporting on the treatment measures under Section 5.1. The treatment measures subject to reporting are:

- Inter-War Era Historic Context
- Design Guidelines and Building Materials Catalog
- Design Guidelines Professional Assistance and Monitoring Activities
- Army Federal Preservation Officer (FPO) Policy Memorandum for Inter-War Era National Historic Landmarks
- Army's Inter-War Era Housing Program Comment Website Activities
- Public Education/Social Media Activities
- Imitative Substitute Materials Lifecycle Data Provisions Reporting

Program Comment Section 5.1 requires that annual reports be submitted by the Army to the ACHP by 31 January of each year from 2021 to 2025. The 2020 Annual Report summarizes Program Comment implementation activities undertaken by the Army from 4 September 2020 to 31 December 2020.

II. Inter-War Era Housing Historic Context

This treatment measure is mentioned in this 2020 Annual Report for reference only since the Program Comment requires the Inter-War Era housing historic context to be completed by the end of calendar year 2021. This technical study is a treatment measure defined under Program Comment Section 3.2.1 *Army Inter-War Era Housing Historic Context* to explore the history and to document the historic importance of Inter-War Era residential construction by the Army.

The Program Comment stipulates that the Historic Context will: expand on existing Inter-War Era housing historic context information; address the precedents on which Army Quartermaster Corps Inter-War Era house styles are based, examine Army Inter-War Era housing design in the context of architectural design trends in the civilian sector, further describe the architectural styles present in the Army's inventory of Inter-War Era housing and, examine Army Inter-War Era housing in the context of social and economic changes during the Inter-War Era. This objective will be achieved through archival research and analysis of the social, legislative, economic, and cultural factors that influenced plan, design, and construction of Army residential

buildings during the Inter-War period. Architectural styles represented in this class of Army real property will be described. Particular emphasis will be placed on relationship between military housing design and construction and housing design and construction completed in the civilian private sector during the period. The results of the investigation will be presented in an illustrated technical report that will be submitted and made available by the end of calendar year 2021, in accordance with the terms of the Program Comment.

III. Design Guidelines and Building Materials Catalog

The Program Comment requires the Army to carry out Inter-War Era housing management actions in accordance with Design Guidelines, Building Materials Catalog, and building materials selection criteria and procedures to ensure that the historic and architectural character of Inter-War Era housing is maintained. This requirement is stipulated under Program Comment Section 3.2.2 *Design Guidelines, Building Materials Catalog, and Building Materials Selection Criteria and Procedures for Army Inter-War Era Housing*. The schedule for treatment measures in Section 6.b. of the Program Comment states that the Design Guidelines and Building Materials Catalog are to be complete on date of issuance of the Program Comment. These documents were finalized on 4 September 2020, at the time of ACHP issuance of the Program Comment, and are included as Appendices A and B in the Program Comment. The Design Guidelines and Building Materials Catalog are, along with the complete text of the Program Comment, posted on the Army's Program Comment website: <https://www.denix.osd.mil/army-pchh/home/>.

Design Guidelines:

The Design Guidelines provide guidance for the treatment of all Army Inter-War Era housing and associated buildings, structures, and landscape features. Application of the Design Guidelines in decision making ensures that historic materials and character-defining architectural features of Inter-War Era housing, associated buildings, structures, and landscape features are managed within the requirements of the Program Comment. The Design Guidelines establish treatment parameters for the overall shape, style and design of the buildings, decorative details, interior spaces and features, as well as treatment parameters for associated landscape features.

Building Materials Catalog:

The Building Materials Catalog establishes a methodology for selecting building materials for use in the rehabilitation or renovation of Army Inter-War Era housing that maintain the historic and architectural character of this class of resource. Catalog entries are organized to correlate with major building components and include foundations, walls, roofing, porches, windows, entries, landscape elements, and interior features. Design considerations developed for each entry include location, type, size, finish and maintenance; guidance for the consideration of in-kind and imitative materials in building management is provided when replacement of historic building materials is required. Emphasis is placed on retention of the design integrity of the historic property. It is anticipated that the types of imitative materials addressed in the Building Materials Catalog will be expanded, as acceptable new building materials are introduced on the

market, in consultation with the ACHP as defined in Section 8.0(b). Any amendments to the Building Materials Catalog will be posted on the Army's website.

IV. Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure Professional Assistance, Oversight, and Monitoring Activities

Professional assistance, oversight, and monitoring activities are stipulated under Program Comment Section 3.2.2.5 *Ensure management actions follow the Design Guidelines, Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure*. In the 2020 reporting period, professional assistance, oversight, and monitoring for application of the Design Guidelines, Building Materials Catalog, Building Materials Criteria, and Building Materials Selection Procedure, along with overall application of the Program Comment were completed by the Army. These actions included formal Army-wide outreach and training events with commands, installations, and privatized housing partners; establishment by the Army FPO of a contract to provide direct, on-call (telephonic and electronic) and on-site professional assistance and technical support to installations and privatized housing partners. The Army FPO directly engaged in the development, implementation, oversight, and monitoring of all of these actions. On-site professional assistance and technical support visits were planned during the 2020 reporting period but had to be postponed due to COVID-19 pandemic precautions and restrictions. The Army FPO is planning to commence on-site professional assistance and technical support visits once COVID-19 pandemic precautions and restrictions are relieved.

Following the ACHP's issuance of the Program Comment, the Army deployed an extensive Program Comment implementation training and professional assistance program. Training and professional assistance was implemented in 2020 for Army-wide implementation of the Program Comment, Design Guidelines, Building Materials Catalog, Building Materials Criteria, and Building Materials Selection Procedure by the Army FPO and by historic preservation experts from Goodwin and Associates (a professional historic preservation consulting firm), who meet the Secretary of the Interior's Professional Qualification Standards. Contractual support from Goodwin and Associates was acquired by the Army Secretariat specifically to provide professional assistance and technical support for Program Comment implementation. Following the approval of the Program Comment by the ACHP on 4 September 2020, Program Comment implementation training was provided to the effected Army organizations and privatized housing partners through structured briefings, distribution of Program Comment-relevant documents and materials, and also by a series of follow-up coordination and assistance engagements. Formal, structured training occurred through a series of conference calls / webinars that included step-by-step Program Comment implementation procedures, and question and answer sessions. Professional assistance was also made available through direct coordination at the individual installation level with focus on installation-specific circumstances. Teleconferences were held with individual installation-level Army personnel and privatized housing partner representatives to provide additional support in implementation, and afforded opportunities to address detailed questions and comments related to the implementation process.

Four initial training events were held in September 2020, following issuance of the Program Comment by the ACHP. The formal training events were sponsored and hosted by the Army FPO with professional assistance and technical support provided by historic preservation experts from Goodwin and Associates. Resource materials on the Program Comment and its implementation were provided to all participants prior to the training sessions and were reviewed during the sessions. The purpose of these training events was to address key areas including: Program Comment background, purpose, content, effect, and requirements; step-by step application of the Design Guidelines and Building Materials Catalog, Building Materials Criteria, and Building Materials Selection Procedure; and the step-by step application of the Demolition Procedure, and to identify and provide access to professional assistance support. The training also provided and addressed the Program Comment discovery procedures for historic properties and Native American and Native Hawaiian human remains and funerary objects. The presentations provided an opportunity for all Army command and installation staff and privatized housing partners to offer comments and questions related to implementation requirements. Follow-on professional assistance actions occurred telephonically after the initial training events. Program Comment implementation training in 2020 included:

- 10 September 2020, Army Cultural Resources Managers (CRM) Community of Practice (includes all command and installation level CRMs, and environmental program managers (federal government employees and contractors)
- 16 September 2020, All Army Privatized Housing Partners
- 23 September 2020, All Army privatized housing managers at command and installation levels (government employees)
- 24 September 2020, All non-privatized Army housing managers at command and installation levels
- 8 October 2020, Army Privatized Housing Partner-specific follow-up coordination - Lincoln
- 15 October 2020, US Army Corps of Engineers (USACE) Military Housing Privatization Initiative Realty Specialists
- 21 October 2020, Army Privatized Housing Partner-specific follow-up professional assistance and monitoring – Lendlease
- 28 October 2020, Army Privatized Housing Partner-specific follow-up professional assistance and monitoring – Clark, Lincoln, Hunt
- 18 November 2020, Army Privatized Housing Partner-specific follow-up professional assistance and monitoring – Balfour Beatty
- 16 December 2020, Army Privatized Housing Partner-specific follow-up professional assistance and monitoring – Corvias

Formal training on the implementation of the Program Comment was supplemented by the immediate introduction by the Army FPO of on-call historic preservation professional assistance and technical support from Goodwin and Associates. Their contact information was distributed broadly to all installations and privatized housing managers with Inter-War Era housing. Professional assistance and technical support from Goodwin and Associates includes direct, on-call telephonic and electronic access to these qualified historic preservation professionals to address installation-specific questions regarding the implementation of the Program Comment, and application of all criteria and procedures contained therein. Notable professional assistance

and technical support during the 2020 reporting period was provided for planned work to Inter-war Era housing at Fort Bliss by Balfour Beatty Communities. This support included consultation with the Fort Bliss Project Director on the development of internal Fort Bliss guidelines for on-site personnel to ensure compliance with the Program Comment in all work related to Inter-War Era housing.

On-site professional assistance and technical support visits were planned during the 2020 reporting period but had to be curtailed due to the COVID-19 pandemic. A schedule for on-site technical support to privatized housing partners has been developed for 2021. The 2021 schedule is pending resolution of precautions and restrictions associated with the COVID-19 pandemic.

Overall, the totality of these activities ensure installations and Army privatized housing partners with Inter-War Era housing fully implement all provisions of the Program Comment including the Design Guidelines, Building Materials Catalog, the Building Materials Selection Criteria and Selection Procedure, and the building demolition criteria and procedures. The Army has made the Design Guidelines and Building Materials Catalog publicly available on the Army's Inter-War Era Housing Program Comment website, ensured the availability of historic preservation professional assistance for Design Guidelines and Building Materials Catalog implementation, and monitored and reported on the implementation of the Design Guidelines, and Building Materials Catalog, Building Materials Selection Criteria, and Building Materials Selection Procedure. The Army FPO has maintained oversight and monitored Design Guideline and Building Materials Catalog implementation, in full compliance with Program Comment section 3.2.2.5.

V. Summary of 2020 Application of Building Materials Selection Criteria and Procedures, and Application of Demolition Procedures

Site Specific Summary of 2020 Application of Building Materials Selection Criteria and Procedures:

The Program Comment criteria for building materials selection are: When health and safety of military families is of concern, or when the initial or on-going use of historic building materials and in-kind building materials impacts the Army's ability to fully implement quality of life improvements to housing for military families, imitative substitute building materials will be considered for use only in a manner that maintains the historic and architectural character of the historic housing and when consistent with the results of the following building materials selection procedure. During the 2020 Program Comment reporting period (4 September 2020 – 31 December 2020), the following actions regarding application of the building materials selection criteria and procedures occurred:

A building materials replacement action occurred for interior ceiling molding in one Inter-War Era unit at Schofield Barracks, Hawaii. The action was implemented by the Army privatized housing partner Lendlease Public Partnerships LLC. Application of the Building Materials Criteria and Building Materials Selection procedure were appropriately implemented and documented. The historic use of lead-based paint on the existing historic molding, missing pieces of ceiling molding, and termite damage prompted this action. In accordance with the

Program Comment procedures, the three treatment approaches evaluated were: (1) salvage and restoration of existing historic building materials, (2) replacement of failing historic building materials with in-kind building materials, and (3) replacement of the historic moldings using imitative substitute building materials. A treatment approach was selected that combined approaches (1) salvage and restoration of existing historic building materials, and (2) replacement of failing historic building materials with in-kind building materials. Historic molding that was not failing was salvaged and reused, while in-kind molding material was used to replace failing historic molding. Work was initiated in December, 2020. The action will continue into 2021, the same molding present in other Inter-War Era housing units at Schofield Barracks will be similarly evaluated, and replaced as necessary in 2021.

A building materials replacement action occurred for 16 Inter-War Era housing units at Fort Benning, Georgia during the 2020 reporting period. Application of the Building Materials Criteria and Building Materials Selection procedure were appropriately implemented and documented. Health and safety concerns were identified due to lead based paint presence on the historic windows. The 16 housing units include 20 window bays per home on the average. The action was implemented by the Fort Benning privatized housing partner Clark LLC. The existing historic windows are 6 over 6, true-divided light, wooden, double hung sash type. The historic windows have a cantilever pulley system, which requires continuous maintenance. The existing historic windows were replaced with 6 over 6 simulated-divided light vinyl windows, custom ordered to match the existing historic window size and profile. There was no change in the number or location of window bays on home elevations. Due to lead-based paint concerns, the historic windows replacement work was performed when homes were vacant. In terms of financial impact and ability to fully implement quality of life improvements, the vinyl windows initial cost is significantly less than rehabilitating the historic windows, or purchasing in-kind windows. The long term maintenance anticipated for the vinyl windows is also significantly less than the historic windows or in-kind windows, the vinyl windows also have a long term replacement warranty. Most importantly, this action has eliminated the lead-based paint exposure risk to military families that was present due to the lead-based paint on the historic windows.

Site Specific Summary of 2020 Application of Demolition Procedures:

A demolition procedure for Army Inter-War Era housing was established in section 3.2.5.1 of the Program Comment. The demolition procedure includes: evaluating the condition of the building, considering prudent and feasible alternatives to demolition, preparing a Building Disposition Report, soliciting comments on the Building Disposition Report, and submitting a Major Decision Package. No Army Inter-War Era housing demolition actions occurred during the 2020 annual reporting period.

VI. Army Federal Preservation Officer National Historic Landmarks Policy Memorandum for Inter-War Era Housing

In meeting the treatment measure specified in Program Comment Section 3.4.f, the Department of the Army FPO issued a NHPA policy memorandum regarding Inter-War Era housing National Historic Landmarks (NHL) entitled *Preservation of Army Inter-War Era*

National Historic Landmark Housing (1919-1940). The NHL policy memo is posted on the Program Comment website. Implementation of this treatment measure is complete. The policy memorandum underscores that NHLs “have specific statutory and regulatory requirements for special consideration and a higher standard of care and preservation under NHPA Section 110(f), and 36 CFR 800.10.” The Army has 213 Inter-War Era housing units that are contributing elements to three Army NHL districts:

- 206 units within the NHL district at West Point, New York;
- Six units within the NHL district at Fort Myer, Virginia; and
- One unit within the NHL district at Fort Shafter, Hawaii.

The policy memorandum clearly states that the Program Comment is not applicable to Inter-War Era housing units that are NHL properties, and that the Army will comply with NHL regulatory requirements including NHPA Section 110(f), 35 CFR 800.3 - 800.7, and 36 CFR 800.10.

VII. Army Program Comment Website Activities

The extensive documentation regarding the history of Army Inter-War Era housing are public educational materials, and have been consolidated and are maintained by the Army on a publicly accessible website located at <https://www.denix.osd.mil/army-pchh/home/>. The website was initially established by the Army in 2019 for the purposes of Program Comment consultation with interested parties, and was redesigned in September 2020 after the ACHP issued the Program Comment. The website redesign occurred to better facilitate public access to information in accordance with the Program Comment, and provides clear and easy public access to Army Inter-War Era housing historical information and associated documents as well as the archival administrative record pertaining to the development of the Program Comment. Program Comment implementation materials, including the Program Comment, Design Guidelines, Building Materials Catalog, and the NHL policy memorandum, are also posted on the front page of the website, along with annual reports, technical documents, media links, and Army historic preservation public outreach materials.

VIII. Public Education/Social Media Activities

In addition to the existing Inter-War Era housing historic contexts, Design Guidelines, Building Materials Catalog and extensive Inter-War Era housing historical documentation available on the website, additional public educational materials were developed and distributed in 2020 as required in the Program Comment. The Program Comment requires that the Army develop and distribute monthly social media content through 2025 using the information developed for the Program Comment for Inter-War Era housing and general information pertaining to Army historic preservation activities and other Army historic property types.

The Army is conducting its social media outreach using Twitter, and provided monthly tweets published to <https://twitter.com/DENIXnews> (link to the Twitter page is also provided on the Program Comment webpage). The 2020 Tweets were published in October, November, and

December. The Army received over 800 views of its Twitter posts during the reporting period. The Tweets and their associated Twitter activity is provided in Table 1.

Table 1: 2020 Program Comment Social Media / Twitter Summary		
Posted Date	Tweet Content	Total Views
Oct. 1, 2020	With the ACHP adoption of the Program Comment for Inter-War Era housing on 4 Sep 2020, historic preservation is now part of the solution to the Army’s most critical historic housing issues. More info at https://www.denix.osd.mil/army-pchh/home/	212
Nov. 2, 2020	Published in the Federal Register! Notice of Issuance of the Army Program Comment for Inter-War Era Historic Housing. Read more about this important notice and how the Army is partnering and implementing in coordination with ACHP at https://www.federalregister.gov/documents/2020/10/13/2020-22572/notice-of-issuance-of-the-department-of-the-army-program-comment-for-inter-war-era-historic-housing	374
Dec. 1, 2020	This is Army innovation! This approach improves the quality of life, health and safety for thousands of Army families who live in historic housing built during the Inter-War period (1919-1940), and ensures historic preservation and the character of housing. See what the Army is doing now at https://www.denix.osd.mil/army-pchh/home/	222

IX. Building Materials Lifecycle Data (see Appendix)

Building materials lifecycle data tracking is identified under Program Comment Section 3.2.4 *Lifecycle Data Tracking for In-Kind Building Materials and Imitative Substitute Building Materials Used in Army Inter-War Era Housing*. The Army is tracking lifecycle data for in-kind and imitative substitute building materials used on 361 Inter-War Era housing units present on two Army installations, these data are provided in the Appendix to this annual report. Building material performance is being tracked at one installation located in the Mid-Atlantic region (for in-kind wood replacement windows, synthetic (faux) slate roofing, and fiber cement siding), and at one installation located in the Southeast region (for vinyl replacement windows, and PVC window trim). A total of over 3,000 building material lifecycle data points are being tracked in this effort. Performance data are collected at the housing unit level and reported annually from 2020 to 2025; performance data will then be collected and reported at five-year intervals, in 2030, 2035, 2040, 2045, 2050, and 2055. The Appendix to this Annual Report meets the Program Comment requirement for building materials lifecycle data reporting, and is the initial submission of these data in satisfaction of the Program Comment.

The following in-kind building material and imitative substitute building materials in 361 Inter-War Era historic housing units are being tracked in accordance with the Program Comment:

Table 2: Building Materials Lifecycle Tracking and Associated Number of Housing Units	
Material	Number of Housing Units
Windows, vinyl replacement	202
PVC window trim	202
Windows, in-kind wood replacement	83
Synthetic slate roofing	76
Fiber Cement Siding	76

The building materials lifecycle data points tracked and reported in the Appendix to this annual report include:

- Housing Unit Number
- Date of Housing Unit Construction
- Year New Material Installed (initial installation)
- Year New Material Replaced - this information will be filled out as the material is replaced
- Total Lifecycle of New Material - lifecycle will be calculated at the time of replacement of new material (number of years)
- Lead Paint Hazard Removed (Y/N/ Not Applicable)
- Warranty (Y/N)
- Warranty (# years)
- Warranty Terms of Replacement - includes information regarding terms of replacement (if any)

The Army will amend, update, and correct these lifecycle data, as needed, to ensure their accuracy.

X. Summary Review

Program Comment section 5.1 requires that the Program Comment Annual Report 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.

There were no decisions made for housing demolition in the 2020 reporting period. Plans for future demolition, possibly over the next five years may include 35 Inter-War Era housing units in the Edgewood Area of Aberdeen Proving Ground, Maryland. The possible demolition of these units was discussed during the Army’s Program Comment stakeholder consultations.

There have been no major or significant issues or misunderstandings that have arisen in the course of applying the Program Comment during the 2020 reporting period. Regarding the overall effectiveness of the Program Comment, our commands, installations, and housing

privatization partners indicate this Program Comment is fully meeting its intent and purpose, and will continue to successfully balance historic preservation requirements with the well-being of the thousands of military families who live in this historic housing.

In the coming year, it is expected that a number of management actions involving the repair or replacement of building materials will be required for Inter-War Era housing at multiple locations. The building materials selection criteria and procedures will be followed for each action. Those activities will be reported in the 2021 Annual Report. 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.