



SECRETARY OF THE ARMY  
WASHINGTON

25 AUG 2020

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Army Directive 2020-10 (Use of Imitative Substitute Building Materials in Historic Housing)

1. References.

- a. National Historic Preservation Act (NHPA); Public Law 13-287; Title 54, U.S. Code, section 300101 et seq.
- b. Title 36, Code of Federal Regulations, Part 800 *Protection of Historic Properties* (36 CFR 800)
- c. Senate Armed Services Committee Report, Senate Bill 4049, Fiscal Year 2021 National Defense Authorization Act, Title XXVIII (Military construction and general provisions), Subtitle E (Improvements to the management of historic homes)
- d. Army Regulation (AR) 200-1 (Environmental Protection and Enhancement)

2. Purpose. This directive establishes policy for the use of imitative substitute building materials in Army-owned and privatized historic housing, and for the inclusion of such materials in NHPA Section 106 memorandums of agreement (MOAs) and programmatic agreements (PAs).

3. Background. The Army manages the largest inventory of historic housing in the Federal government. Historic housing is housing that is subject to NHPA statutory requirements and NHPA Section 106 compliance procedures in 36 CFR 800. Management of this large inventory of historic housing requires the Army to balance historic preservation considerations required under the NHPA with quality-of-life issues; health risks associated with lead-based paint, asbestos, and other hazards found in historic building materials; and the high costs of historic building materials and in-kind building materials. The judicious use of imitative substitute building materials in lieu of historic building materials and in-kind building materials for the maintenance, repair, rehabilitation, and renovation of historic housing helps to achieve that balance. Imitative substitute materials are cost-effective, last a reasonable length of time, provide an accurate simulation of historic building materials and, with proper planning and selection, will successfully maintain the historic and architectural characteristics of historic housing.

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4. Applicability. This directive applies to the Regular Army, the Army National Guard/Army National Guard of the United States, and U.S. Army Reserve. Contracts to operate Government-owned facilities will reference this directive and will designate by specific citation the applicable provisions.

5. Policy.

a. Imitative substitute building materials are modern, industry standard, natural, composite, and synthetic materials that simulate the appearance of and substitute for more costly historic building materials and in-kind building materials. Historic building materials are building materials that are 50 years old and older. In-kind building materials are new building materials that are identical to historic building materials in all possible respects, including their composition, design, color, texture, and other physical and visual properties.

b. Imitative substitute building materials will be considered for use in the maintenance, repair, rehabilitation, and renovation of Army-owned and privatized historic housing when the quality of life, health, and safety of housing occupants is of concern, or when the use of historic building materials and in-kind building materials is not financially feasible.

c. Imitative substitute building materials will be selected and used with appropriate planning to ensure that the historic and architectural characteristics of historic housing are maintained.

d. All NHPA Section 106 MOAs and PAs pertaining to historic housing that are amended or executed after the date of this directive shall provide for the use of imitative substitute building materials in Army-owned and privatized historic housing to the maximum extent possible.

e. Any privatized housing partner holding title to historic Army housing shall be an invited signatory to all NHPA Section 106 MOAs and PAs pertaining to that housing that are amended or executed after the date of this directive.

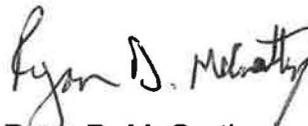
f. This policy applies to Army-owned and privatized historic housing subject to the requirements of the NHPA. This policy does not apply to historic housing addressed in NHPA Section 106 Program Comments issued pursuant to 36 CFR 800.14(e), historic housing that has been formally designated by the National Park Service as a National Historic Landmark, and historic housing that has been formally designated by the National Park Service as a contributing property within a National Historic Landmark

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District. This policy does not apply to Civil Works functions of the U.S. Army Corps of Engineers.

6. Proponent. The Deputy Chief of Staff, G-9 is the proponent for this directive and, under the policy oversight of the Assistant Secretary of the Army for Installations, Energy and Environment, will incorporate its provisions into AR 200-1 within 2 years.

7. Duration. This directive is rescinded on publication of the revised regulation.



Ryan D. McCarthy

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