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***Program Comment for
Vietnam War Era Historic Army Housing
(1963-1975): Mitigation Measures and
Benefits of the Program Comment***

**27 April 2022
Stakeholder Consultation Briefing**



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

BRIEFING AGENDA for 27 APRIL 2022:

- INTRODUCTION
- ARMY VIETNAM WAR ERA HOUSING PROPERTY TYPE 1963-1975
- MITIGATION MEASURES
 - Education
 - Research
 - Inventory and Documentation
 - Tax Credits
 - Annual Reporting
 - Properties of Particular Importance
- BENEFITS OF THE PROGRAM COMMENT AND MITIGATION MEASURES
- 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.>



INTRODUCTION

- The Army manages the largest portfolio of historic housing among all Federal agencies.
- Presently comprised of over 30,000 historic homes, the Army will add 70,000 historic homes to our inventory within the next 50 years and will have a total of over 100,000 homes subject to National Historic Preservation Act (NHPA) Section 106 compliance.
- The Army's historic housing is intensively used and managed since it is actively occupied by thousands of military families. Addressing NHPA Section 106 compliance requirements for the thousands of repetitive management actions occurring on this large housing inventory presents unique and significant challenges for the Army.
- The standard Section 106 case-by-case compliance approach in 36 CFR 800.3 through 800.6 is not sustainable for the Army's intensively used, high turnover, large and growing inventory of historic housing.
- The magnitude and complexity of the Army's unique Section 106 compliance challenge requires the programmatic approach provided by Program Comments.
- The proposed Program Comment addressing 7,500 historic Vietnam War era homes is a top priority for the Army's historic preservation program. In proposing the Program Comment for Vietnam War era housing, the Army seeks to proactively address a large inventory of similar historic properties from the recent past that is subject to many repetitive management actions.



INTRODUCTION (cont.)

- Program Comments, as provided for at 36 CFR 800.14(e), are an alternate method for Federal agencies to meet their NHPA Section 106 obligations.
- Program Comments allow agencies to tailor Section 106 to meet the needs of the agency.
- Program Comments follow a different paradigm than the standard project-by-project, property-by-property review process under 36 CFR 800.3 through 800.6.
- Program Comments give the Advisory Council on Historic Preservation (ACHP) the ability to issue comments on an entire Federal program or entire class of properties and undertakings in lieu of conducting individual reviews on a project-by-project basis under 36 CFR 800.3 through 800.6.
- The primary benefit of Program Comments is that it allows a Federal agency to comply with Section 106 in a single action for a class of undertakings rather than addressing each undertaking as a single action.
- This is especially advantageous to those federal agencies that have repetitive management actions for a large inventory of similar types of historic properties or for those agencies that have programs that generate many similar undertakings.
- For additional information, see 36 CFR 800.14(e) and the ACHP's Program Comment guidance at:
 - https://www.achp.gov/program_alternatives/program_comments
 - https://www.achp.gov/program_comment_questions_and_answers



Program Comment for Vietnam War Era Historic Army Housing



INTRODUCTION (cont.)

- Program Comments were incorporated into the Section 106 regulation at 36 CFR 800.14(e) specifically to address situations such as the Army's, where an agency has recurring actions on a large inventory of similar property types. The ACHP membership has approved 15 Program Comments proposed by Federal agencies over the last 20 years and has thereby established precedents for Program Comments.
- The mitigation measures proposed for Army Vietnam War Era housing (1963-1975) follow the precedent set by the ACHP membership in 2002 when they approved the Program Comment for Capehart-Wherry Housing (1949-1963) and the mitigation measures for that inventory of Modern housing.
- The Program Comment for Capehart Wherry housing is an ACHP / Department of Defense success story as related in the ***ACHP Section 106 Success Story: Capehart Wherry Housing Challenge Spurred Innovative Solution***. That success is highlighted by the fact that approximately 18,500 Army Capehart Wherry homes (over 97%) have been maintained and continue to be used today as viable housing assets and millions of dollars have been saved due to the efficiencies resulting from operating under the Capehart Wherry Program Comment.
- Efficient, consistent, and cost-effective management capabilities provided by the Capehart-Wherry Program Comment has resulted in that historic housing inventory remaining a viable and sustainable mission-supporting real property asset. The Program Comment for Capehart-Wherry housing has protected the housing, ensured its continued historical use, saved millions of dollars, and improved the material living conditions and well-being of the many thousands of military families living in that historic Army housing.

The best means to ensure preservation of the Army's large inventory of historic housing is to sustain historic housing as a viable mission-supporting asset through the management capabilities provided by Program Comments



ARMY VIETNAM WAR ERA HOUSING PROPERTY TYPE 1963-1975



Fort Riley KS – 1963



Fort Campbell, TN – 1963



Fort Detrick, MD – 1965



Fort Gordon, GA – 1966



Fort Benning, GA – 1969



Fort Carson, CO – 1970



Fort Jackson, SC – 1972



Fort Bragg, NC – 1974-1975



Fort Benning, GA – 1975



MITIGATION MEASURES

- The purpose of Section 106 mitigation measures are to address the adverse effects of Federal agency undertakings on the historic properties that are affected by those undertakings.
- The National Historic Preservation Act definition of “historic preservation” at 54 USC 300315 is:
 - (1) *identification, evaluation, recordation, documentation, curation, acquisition, protection, management, rehabilitation, restoration, stabilization maintenance, research, interpretation, and conservation;*
 - (2) *education and training regarding the foregoing activities; or*
 - (3) *any combination of the foregoing activities.*
- The Army’s proposed Program Comment mitigation measures for Vietnam War Era housing were designed to ensure they followed the statutory definition of historic preservation, address the effects of the undertaking on Vietnam War era housing, and are commensurate with its National Register significance under Criterion A.
- The Army’s proposed mitigations include a combination of identification, evaluation, recordation, and documentation of Vietnam War era housing, in-depth scholarly research, public education, and training information to Army privatized housing partners.
- This combination of actions, along with additional measures to identify and document properties of particular importance and annual reporting properly mitigate the effects of the undertaking and will provide for the preservation of Army Vietnam War era housing.



MITIGATION MEASURES (cont.)

EDUCATION

- The Army's public educational mitigation measures include:
 - Establishment of an Army Vietnam War Era Housing public website.
 - Publication of reports and other information regarding the history of the Army Vietnam War Era housing and their availability to the general public for educational purposes.
 - Use of social media via Army Twitter to distribute public information on Vietnam War era historic housing and Army historic preservation.



MITIGATION MEASURES (cont.)

RESEARCH:

- The Army will provide additional scholarly research information on the history of Vietnam War era housing. The Army will conduct additional in-depth Army-wide/nation-wide professional research and supplement the Army Vietnam War Era housing historic context that was published in February 2022.
- The Army's additional historic context research will include further research and assessment of historical and archival information relevant to the nation-wide historic context of the housing and further address:
 - Civilian architectural trends, 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.
 - Other important aspects pertaining to the history and architecture of Army Vietnam War era housing.
- The Army will prepare this additional research that will supplement the existing historic context document published in February 2022, and that combined information will be available to the public on the Army website.



MITIGATION MEASURES (cont.)

INVENTORY, EVALUATION, AND DOCUMENTATION

- This mitigation measure includes the creation of additional information for Army Vietnam War Era housing based on the conduct of installation-level inventory, evaluation and documentation.
- The Army will complete the inventory, evaluate, and document representative Vietnam era housing for all installations having the property type. The Army has already complete inventory and evaluation, and documentation at 10 installations, published in February 2022. The Army will conduct additional inventory, evaluation, and documentation at the remaining Army installations (Fort Campbell, Fort Riley, Fort Sill, Fort Irwin, Fort Jackson, Fort Leavenworth, Dugway Proving Ground, Fort Stewart, Redstone Arsenal, Joint Base Lewis McChord, Rock Island Arsenal, McAlester AAP, and Aberdeen Proving Ground) and will:
 - Document representative architectural styles, design elements, associated buildings and structures, and landscape features.
 - Provide historic building inventory forms and photographs as documentation.
 - Identify and evaluate properties for exceptional importance
- This mitigation measure is intended to provide a comprehensive information set of representative examples of the Vietnam War Era housing property type from all Army installations where it is present.
- The Army will make the new and existing identification and documentation materials available on the Army's Program Comment website in order to create a single, one-stop source of information.



MITIGATION MEASURES (cont.)

TAX CREDITS

- The Army will advise its housing privatization partners that Vietnam War Era housing may be eligible for historic preservation tax credits and provide information sources.

ANNUAL REPORTING

- 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 while applying the Program Comment, how those were addressed, 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.
- After its submission of the Annual Report and upon the ACHP's request, the Army will schedule and attend a meeting with the ACHP and invitees to discuss implementation of the Program Comment.



MITIGATION MEASURES (cont.)

PROPERTIES OF PARTICULAR IMPORTANCE

- 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 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.
- Some public 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 expressed a desire for preservation of such properties.
- The Army has significantly revised Section X, Properties of Particular Importance in the Final Program Comment Plan.
- Properties of particular importance are currently defined in the Final Program Comment Plan with specific criteria: *Properties of particular importance are defined as 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.*



MITIGATION MEASURES (cont.)

TREATMENT OF PROPERTIES OF PARTICULAR IMPORTANCE (cont.)

- Properties of particular importance will be identified through the Army's continued inventory and evaluation of Vietnam War Era housing under the Program Comment mitigation measures. The process for treatment of properties of particular importance includes coordination with the ACHP at each step.
- 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 consider the preservation of these properties through continued use as military housing.
- This approach is based on the precedent established in the Program Comment for Army Capehart-Wherry housing. In fact, the ACHP originally proposed the term *Properties of Particular Importance* and the approach in that Program Comment.



Program Comment for Vietnam War Era Historic Army Housing



BENEFITS OF THE PROGRAM COMMENT AND MITIGATION MEASURES FOR ARMY VIETNAM WAR ERA HISTORIC HOUSING

- **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 contributes directly to improving the quality of life, health, and safety of the thousands of Army families living in Vietnam War era housing.
- **MORE CONSISTENT AND VALUE-ADDED PRESERVATION OUTCOMES:** The Program Comment delivers the appropriate Army-wide perspective to address this property type. It addresses historic significance based on research at an appropriate scale and affords more consistent and value-added treatment, mitigations, and preservation outcomes relative to the project-by-project review process.
- **HISTORY AND ARCHITECTURE DOCUMENTED:** The Army will inventory, evaluate and document Vietnam War era housing, associated buildings and structures, and landscape features nation-wide, including all installations that have this housing. New in-depth historic context research on the history and architecture of American housing is made available to academic researchers and the general public and provides a significant contribution to historic preservation scholarship for this historic property type that has not been well researched or documented on a nation-wide basis.
- **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 ensure this historic housing is maintained as a viable mission asset and continues its historic function as housing.
- **IDENTIFICATION AND PRESERVATION OF PROPERTIES OF PARTICULAR IMPORTANCE:** Any properties of particular importance identified by the historical research and inventory will be addressed in coordination with the ACHP and subject to additional documentation.
- **PUBLIC EDUCATION:** The public will benefit from the historic preservation education materials that will be made available by the Army through its website and through social media.



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BACK-UP INFORMATION



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

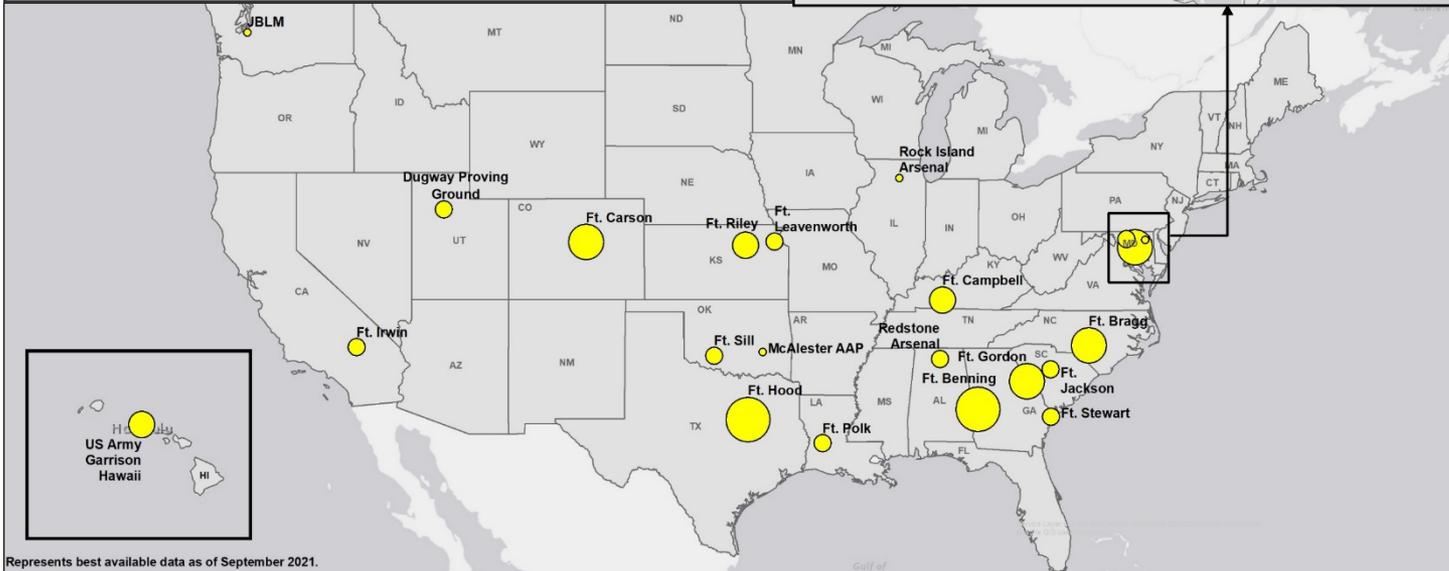
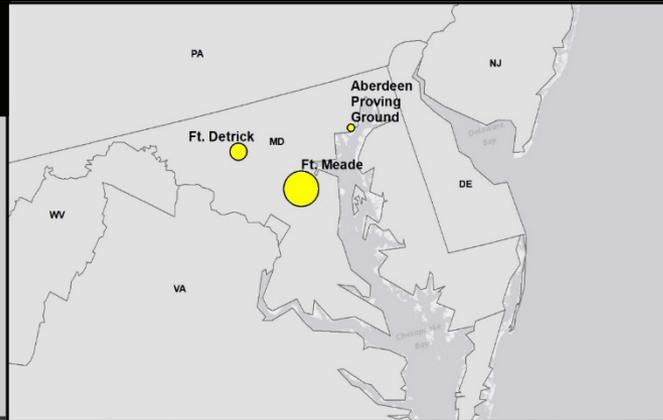
Army Vietnam War Era Housing Property Type Distribution

Period VII

1963-1975: Vietnam War Era Housing – 7,519 Units

Number of Period VII Housing Units Per Installation

- 1 - 10
- 11 - 200
- 201 - 500
- 501 - 1000
- 1001 - 2000



Installation	Housing unit Numbers
Fort Hood TX	1832
Fort Benning GA	1292
Fort Carson CO	839
Fort Gordon GA	740
Fort Meade MD	675
Fort Bragg NC	615
USAG-Hawaii HI (2)	256
Fort Campbell KY	230
Fort Riley KS	211
Fort Sill OK	199
Fort Polk LA	182
Fort Irwin CA	120
Fort Jackson SC	119
Fort Leavenworth KS	44
Fort Detrick MD	40
Dugway Proving Ground UT	39
Fort Stewart GA	38
Redstone Arsenal AL	18
Joint Base Lewis	
McChord (JBLM) WA	10
Rock Island Arsenal IL	10
McAlester Army Ammunition Plant OK	6
Aberdeen Proving Ground MD	4
Total	7,519

Represents best available data as of September 2021.



PROGRAM COMMENT DEVELOPMENT PROCESS

Initiation and Public Review



Stakeholder Consultation



Preparation and Submission



ACHP Action and Implementation

- ACHP engagement
- Notice and Army Program Comment Plan to ACHP
- Army Federal Register Notice

- ACHP
- SHPOs / THPOs
- Indian Tribes
- Native Hawaiian Organizations
- Public

- Prepare and Submit Program Comment to ACHP
- ACHP initiates 45 day review

- ACHP action per 36 CFR 800.14(e)(5)
- Army implementation upon approval

Jul – Dec 2021

Jan – Jun 2022

Jul – Aug 2022

Sep 2022

