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***Program Comment for  
Vietnam War Era Historic Army Housing  
(1963-1975): Program Comment Summary  
and Conclusion***

**22 June 2022  
Stakeholder Consultation Briefing**





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

**BRIEFING AGENDA: Program Comment Summary and Conclusion**

- I. Introduction
- II. Events Leading to the Program Comment
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- IV. Goal and Objective
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\* 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.>



# Program Comment for Vietnam War Era Historic Army Housing



## I. INTRODUCTION:

- This final 22 June 2022 consultation conference for the proposed Program Comment for Vietnam War Era Historic Army Housing provides a comprehensive summary of prior consultation conference topics addressed during the public participation phase of the Program Comment process.
- With this final consultation conference, the Army concludes its Public Participation phase of the Program Comment process. The Army will now move to the next phase in the process, Preparation and Submission of the Program Comment to the ACHP.



## II. EVENTS LEADING TO THE ARMY DECISION TO PURSUE PROGRAM COMMENTS

- **The Army manages the largest portfolio of historic housing among all Federal agencies, and that portfolio is growing.** With over 30,000 historic homes currently, the Army will add 70,000 historic homes to our inventory within the next 50 years and will have an unprecedented total of over 100,000 historic homes subject to the NHPA.
- **Reuters Special Report, Aug 2018 “Children Poisoned by Lead on U.S. Army Bases”** Lead-based paint in historic Army housing is identified as the source of lead poisoning.
- **“Army Housing Crisis”** declared by Secretary of the Army, Jan 2019. Significant Army and Defense Senior Leadership and Congressional Member attention, widespread media reports of housing deficiencies, Congressional testimony from military family members indicating significant quality of life, health, and safety issues in historic housing. The issues continue today.
- **Army Inspector General (IG) Report, Mar 2019: Historic Housing Findings –** Historic housing is more costly to operate, maintain, and renovate; requires special historic building materials and craftsmanship; health and safety concerns such as lead paint and asbestos are present; restrictive floorplans; the processes in 36 CFR 800 and the Programmatic Agreements (PAs) for historic housing are highly procedural, time consuming, with variable application of standards.
- **Army Strategic Agenda for National Historic Preservation Act, Jul 2019** issued by the Assistant Secretary of the Army for Installations, Energy and Environment. Directs the Army Federal Preservation Officer to pursue programmatic NHPA compliance solutions to address the issues identified for historic Army housing. Program Comments identified as the best NHPA programmatic compliance solution for the Army’s inventory of modern historic housing.



### III. PURPOSE AND NEED FOR THE PROGRAM COMMENT

- The efficacy of Program Comments in delivering the required results for NHPA compliance for historic Army housing is demonstrated by Army's implementation of the ACHP approved Program Comment for Army Capehart Wherry housing (1949-1962) and the Program Comment for Army Inter-War era housing (1919-1940).
- Of its current total of over 30,000 historic homes, the Army has over 7,500 homes constructed during the 13-year Vietnam War era from 1963-1975. The Army's 7,500 Vietnam War era homes are a property type subject to thousands of repetitive management actions annually to maintain, manage, and improve the housing for military families.
- Addressing NHPA Section 106 compliance requirements for the thousands of repetitive management actions occurring on this large inventory of modern housing from the Vietnam War era presents unique and significant challenges for the Army. According to the *ACHP Program Comment Questions and Answers*, Program Comments as provided for in 36 CFR 800.14(e), were established in the regulation to specifically address situations such as this, where a Federal agency has repetitive management actions occurring within a large inventory of similar historic property types.
- Local Army installation-level project-by-project compliance has resulted in inconsistent preservation outcomes for the Army's Vietnam War era housing property type. The Program Comment process allows the Army to achieve a broader national perspective on the property type and its significance than local installations possess and account for in their project specific compliance actions.
- A Program Comment is the best NHPA compliance solution of the Army's inventory of Vietnam War Era housing. If a Program Comment is not in effect, the Army is faced with high costs and lengthy process time to comply with Section 106 for each management action occurring on each Vietnam War era home.



# Program Comment for Vietnam War Era Historic Army Housing



## III. PURPOSE AND NEED FOR THE PROGRAM COMMENT (cont.)

- Without a Program Comment, significant compliance costs and process times are required for the NHPA Section 106 / 36 CFR 800 compliance process for each management action. The Army must inventory and identify each housing unit, evaluate National Register of Historic Places (NRHP) eligibility of each unit, assess effects and adverse effects of each proposed management action, resolve any adverse effects through develop of Memoranda of Agreement (MOA), and then implement any MOA required mitigations; or if an MOA cannot be reached, terminate consultation and elevate the individual action to the head of the agency – the Secretary of the Army – for a final decision. Section 106 project-by-project compliance for each management action must occur in consultation with individual State Historic Preservation Offices (SHPO), Federally-recognized Indian tribes or Native Hawaiian Organizations, and other stakeholders, in accordance with 36 CFR 800.4-800.7.
- The Army requires a more efficient, consistent, and cost-effective means to manage the many thousands of repetitive management actions occurring on this inventory of over 7,500 Vietnam War era housing units.
- As stated in the *ACHP Section 106 Success Story: Capehart Wherry Housing Challenge Spurred Innovative Solution*, when the ACHP issued Program Comments for the Capehart and Wherry military family housing (1949-1962), DoD officials indicated that the Program Comment would save \$80 million to \$90 million in NHPA compliance costs by not having to address each of those housing units on an individual case-by-case basis. Also, the Army has documented how the ACHP approved Program Comment for Army Inter-War Era historic housing (1919-1940) has already saved the Army millions of dollars in NHPA related compliance related costs and process efficiencies in just its first full year of operation.
- The Army anticipates that similar significant NHPA compliance cost savings will also result from the Program Comment for Vietnam War era housing in addition to improved process efficiency and greater consistency in preservation outcomes.



# Program Comment for Vietnam War Era Historic Army Housing



## III. PURPOSE AND NEED FOR THE PROGRAM COMMENT (cont.)

- To ensure the quality of life, health and safety of the military families who live in this historic housing, the Army must address the extensive recurring maintenance, repair, and rehabilitation requirements for this housing and seek to control those costs through the use of current industry standard building materials and methods; abate the building materials used in housing from this period that present lead-based paint, asbestos, and other hazards to housing occupants; implement renovations that address the need for additional bedrooms and expanded living space; provide kitchen and bathroom improvements; modernize heating, cooling and ventilation systems; modernize plumbing and electrical systems; and address NHPA compliance processes that can delay the rapid turnaround of housing units for reassigned military families.
- To make certain that the inventory of Vietnam War era historic housing can be maintained as a sustainable real property asset, the Army also must have the ability to manage its total Vietnam War era housing inventory including mothballing housing, and while infrequent, to cease maintenance, and partially or wholly demolish housing that is highly deteriorated, underutilized, vacant, or presents health hazards or unsafe conditions for occupants. When Army housing has been demolished in the past, it has usually occurred to remove highly deteriorated, vacant, and underutilized housing, to provide for construction of new housing for Army families.
- Additionally, the Army has need to lease, transfer, and convey Vietnam War era housing generally for the purposes of housing privatization, to allow for housing operations by our housing privatization partners under the Army's Residential Communities Initiative (RCI).



### **III. PURPOSE AND NEED FOR THE PROGRAM COMMENT (cont.)**

- The Program Comment provides the Army the ability to implement management actions in a more efficient, consistent, and cost-effective manner. These actions in turn improve the quality of life, health, and safety of the Army families living in Vietnam War era housing and help ensure that the inventory of Vietnam War era historic housing will continue to function as a viable and sustainable real property asset.
- Efficient, consistent, and cost-effective management provided by the Program Comment helps to improve the quality of life, health, and safety for military families, creates a more sustainable mission-supporting real property asset, and thereby ensures the continued historical use as housing.



## IV. GOAL AND OBJECTIVE

- 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.



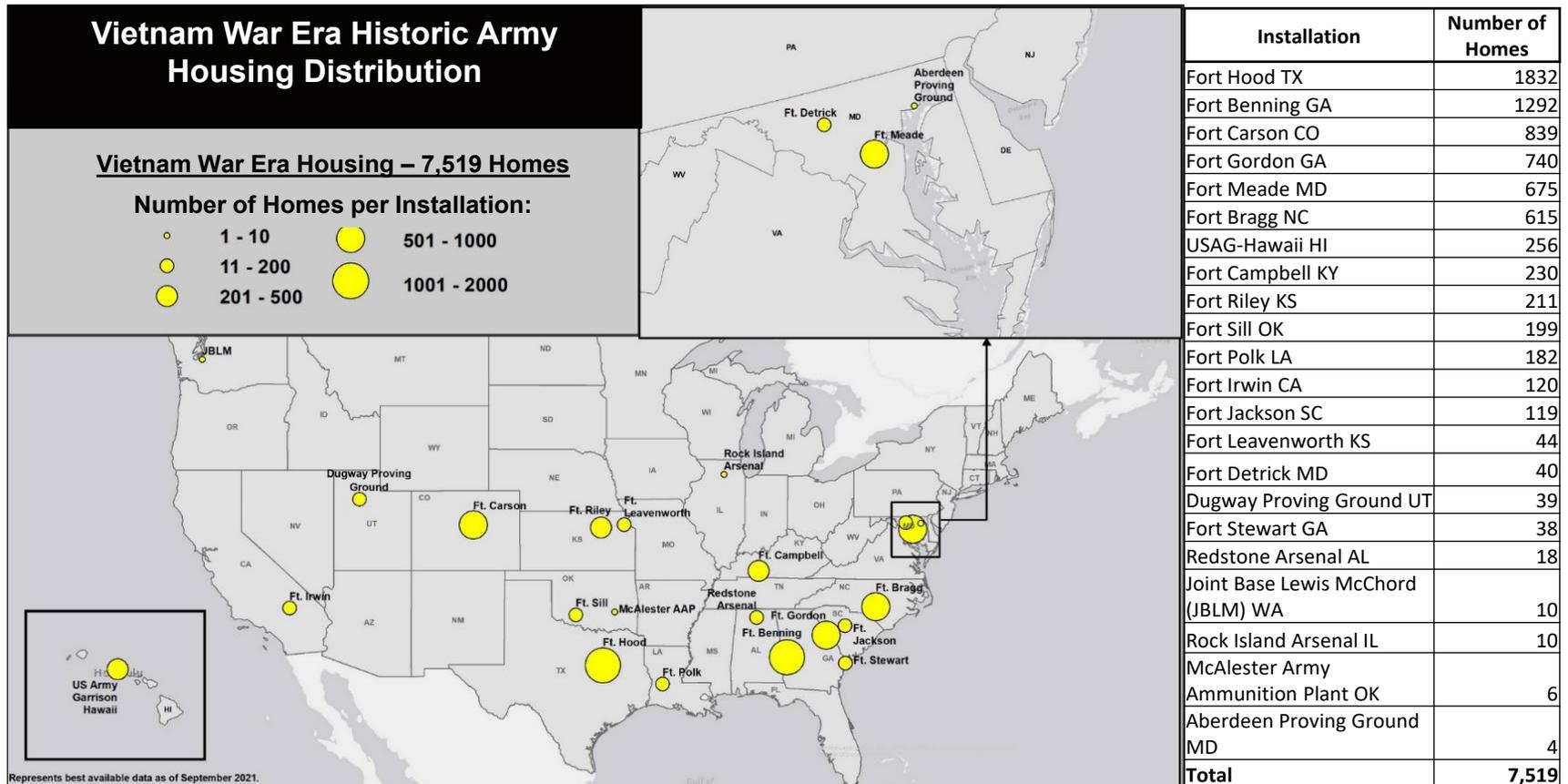
## V. NATIONWIDE PUBLIC PARTICIPATION

- In November 2021, the Army prepared a Draft Program Comment Plan for Vietnam War Era Housing (1963-1975) in accordance with the ACHP Program Comment Panel recommendations and in coordination with ACHP staff. The Army also went above and beyond the ACHP Panel recommendations and provided the Draft Program Comment Plan for a nationwide 30-day public review through a Federal Register notification and individual outreach to over 850 stakeholders.
- The Final Program Comment Plan published on 28 Dec 2022. It addressed public comments received and was used to guide and inform a series of nationwide consultation conferences on the Program Comment.
- Monthly consultation conferences were hosted by the Army FPO beginning in Jan 2022, were open to all interested parties, and continued for a six-month period through Jun 2022.
- Program Comment Consultation Conference 2022 Schedule and Topics:
  - Jan 26: Introduction, Background, Scope, Purpose and Need, Goal and Objective, Development Process
  - Feb 23: Vietnam War Era Army Housing Property Type, Category of Undertaking
  - Mar 30: National Register Significance and Potential Effects
  - Apr 27: Mitigation Measures and Benefits of the Program Comment
  - May 25: Applicability, Implementation, Effect, and Duration
  - Jun 22: Consultation Summary and Conclusion
- Consultation briefings were provided to stakeholders in advance of each scheduled conference call.
- Written comments to the Army FPO regarding the proposed Program Comment were invited at any time during the 26 January 2022 – 22 June 2022 consultation period. The Army FPO received and responded to two sets of extensive written comments from the National Trust for Historic Preservation.



## VI. SCOPE AND LOCATIONS

- There are currently 7,519 from the Vietnam War Era (1963-1975) homes located on 22 Army installations in 16 states, according to the best available inventory information.
- The number of homes per installation ranges from over 1,800 on Fort Hood TX, to 4 housing units on Aberdeen Proving Ground MD.





**VII. PROPERTY TYPE** — Is defined as a grouping of individual properties defined and characterized by common physical and / or associative attributes. A property type may include a variety of buildings and structures, and variations may occur based on cultural, chronological, and geographic influences.

- *Army Vietnam War Era Housing Property Type 1963-1975* - Army Vietnam War Era housing, associated buildings and structures, landscapes and landscape features, and neighborhoods.
- *Army Vietnam War Era Housing* - all privatized and non-privatized housing, with construction started or completed during the period 1963-1975, that is located on an Army installation or joint base and owned, operated, and or managed by the Army or by an Army privatized housing partner including those operating under the RCI program. The terms Army Vietnam War Era housing and Vietnam War Era housing are used interchangeably and mean all Army Vietnam War Era housing, associated buildings and structures, landscapes and landscape features, and neighborhoods
- *Associated Buildings and Structures* – Vietnam War era detached garages, carports, storage buildings, above and below ground utilities and systems including water, sewage, storm water, mechanical and electrical systems, tennis courts, buildings and structures associated with recreational and athletic activities, playground equipment, other recreational buildings and structures, fencing, community centers, associated ancillary facilities that support housing operations, and any and all other buildings, structures, and objects associated with Army Vietnam War era housing and neighborhoods.
- *Landscapes and Landscape Features* - the overall design and layout of the Vietnam War era housing communities including roadway circulation systems and patterns, plantings and landscaping, open spaces, playgrounds, recreational features including but not limited to recreational areas and athletic fields, fencing, parking areas, signage, site furnishings, parade grounds, lighting, sidewalks and curbing, driveways, setbacks, viewsheds into Vietnam War era historic properties and districts and out from Vietnam War era historic properties and districts into other historic properties and districts, and any and all other landscape features associated with Vietnam War era housing and neighborhoods.
- *Vietnam War Era Neighborhood* - a defined geographical area, district, or locality on an installation that is characterized by and comprised predominantly of Vietnam War era housing, associated buildings and structures, and landscapes and landscape features.



## VIII. NATIONAL REGISTER OF HISTORIC PLACES SIGNIFICANCE

- Army Vietnam War era housing is addressed in the *Army Housing Thematic Area* developed in the DoD-wide Vietnam War era historic context: *Vietnam and the Home Front: How DoD Installations Adapted, 1962–1975* (see <https://www.denix.osd.mil/Army-vwehh-pc>).
- 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 has subjected Vietnam War era housing NRHP eligibility, including the housing from 1973-1975, to NRHP evaluation criteria at 36 CFR 60.4(a)-(d). The Army did 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.
- Subject to certain specific considerations, and 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) from an Army-wide standpoint under 36 CFR 60.4(a) (Criterion A).
  - The housing is considered eligible under 36 CFR 60.4(a) (Criterion A) because of its association with Vietnam War military history.
  - 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 Army family housing program.



## VIII. NATIONAL REGISTER OF HISTORIC PLACES SIGNIFICANCE (cont.)

- Regarding National Register Criterion C: Design/Construction - Army Vietnam War era housing does not represent *distinctive* characteristics of type, period, and method of construction, does not retain integrity of design, and is not considered to be eligible for the NRHP under Criterion C:
  - Army family housing constructed during this period is not distinctive since it used industry standard building materials and construction practices and methods of that time, and its designs and development plans followed the existing design concepts and neighborhood planning trends and that were in 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 designs to Architect / Engineering firms from the civilian sector who used industry standard materials and methods in construction of the housing.
  - When viewed in the national context of housing design and construction in the US during this period, Army Vietnam War era housing does not represent distinctive examples of this housing 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 whose components lack individual distinction.



## VIII. NATIONAL REGISTER OF HISTORIC PLACES SIGNIFICANCE (cont.)

- Further regarding National Register Criterion C: Design/Construction – Army Vietnam War era housing does not retain original historic materials and exterior and interior design features that were once characteristic of the property type. The housing overall lacks architectural integrity due to many alterations and modifications that have occurred over time and is not eligible for the NRHP under Criterion C.
  - A comprehensive program to modify and upgrade this housing was undertaken by the Army. These modifications resulted in neighborhood-wide material replacement and design changes that altered the original design intent of the building. Extensive modifications and material replacement has also occurred as a result of material wear, abatement, and/or failure of original interior and exterior materials.
  - Army housing constructed during the Vietnam War era exhibit similar classes of changes in interior and exterior materials. Extensive window replacement has occurred with new replacement windows differing in size, type, and configuration from the originals. Exterior cosmetic redesigns to meet current stylistic trends occurred. New exterior ornamentation is also present referencing earlier architectural styles such as colonial revival.
  - Many interior modifications included replacement of fixtures and tile in the bathrooms, replacement cabinets and appliances in kitchens, and new flooring throughout. In addition, floor plans of units were reconfigured, and units were combined to meet current space and size norms.



## IX. 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 remain *eligible* for purposes of the Program Comment, regardless of age.
- Army Vietnam War era housing that was less than 50 years old at the time of a prior NRHP evaluation, was evaluated under National Register criteria consideration 36 CFR 60.4(g) for exceptional importance and was determined to be *not eligible* for the NRHP with SHPO concurrence, will be considered *eligible* for the NRHP under Criterion A for 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. As such, no further NHPA compliance requirements apply to those properties. There are no known instances of this situation.



## X. CATEGORY OF UNDERTAKING AND EFFECTS ON HISTORIC PROPERTIES

- The category of undertaking for purposes of the Program Comment is **management actions** defined as maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of current readily available industry standard building materials and methods in the implementation of management actions. The Army's large inventory of Vietnam War Era housing, associated buildings and structures, and landscape features are subject to these frequent and repetitive undertakings.
- This category of undertaking is defined based on both the Army's needs and on precedent set by the ACHP in their approval of other Program Comments for Army family housing. The category of undertaking defined for this Program Comment aligns with the category of undertaking approved and adopted by the ACHP in the Army's Program Comment for Army Capehart and Wherry Era historic and the Program Comment for Army Inter-War Era historic military family housing.
- The proposed Program Comment management actions present a potential for adverse effects to Army Vietnam War Era housing, associated buildings and structures, landscapes and landscape features. 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); lease, transfer, or convey the properties out of government control and ownership; or may otherwise remove properties from the Army's inventory.
- The Army will implement mitigation measures to ensure potential adverse effects resulting from implementation of management actions are fully and appropriately addressed.



## XI. IMPLEMENTATION

- The proposed Program Comment would be implemented at all Army installations with privatized and non-privatized Vietnam War era housing, and in consideration of relevant specific exceptions to its applicability.
- The Army would implement the proposed Program Comment management actions in lieu of conducting individual project reviews under 36 CFR 800.3 - 800.7.
- This Program Comment would supersede and replace the requirements in Army Programmatic Agreements (PAs) and Memoranda of Agreement (MOAs) for Army Vietnam War era housing, associated buildings and structures, and landscape features.
- The Army would implement the proposed Program Comment in lieu of all PA or MOA requirements and procedures previously applicable to Army Vietnam War Era housing, associated buildings and structures, and landscape features.
- The Army would implement the Program Comment in lieu of any procedures, plans, development agreements, lease and conveyance documents, environmental management plans, guidelines, reporting requirements, Cultural Resources Management Plans, and all other installation documents, standards, procedures, or guidelines pertaining to the preservation and management of Vietnam War era housing, associated buildings and structures, and landscape features.



## XII. APPLICABILITY AND EXCEPTIONS

- The proposed Program Comment would apply to all privatized and non-privatized Army Vietnam War era housing, associated buildings and structures, and landscape features.
- There are no Army Vietnam War era historic housing, associated buildings and structures, and landscape features that have been determined to be National Historic Landmarks (NHL), or that are believed to qualify for NHL designation.
- Exceptions to applicability of the proposed Program Comment:
  - The proposed Program Comment would not apply to Vietnam War Era housing that was 50 years old or older at the time of a prior NRHP evaluation at the installation level, was evaluated under National Register evaluation criteria 36 CFR 60.4(a)-(d) and determined to be not eligible for the NRHP with SHPO concurrence. As such, the Program Comment will not apply to those properties since no further NHPA compliance requirements apply to those properties. There are no know instances of this occurrence.
  - The proposed Program Comment would not apply when management actions may cause damage, physical destruction, or change in the physical features of all or any part of the following: NRHP eligible archeological sites and properties of traditional religious and cultural importance to Federally-recognized Indian tribes or Native Hawaiian Organizations; NHPA historic properties other than the Army Vietnam War era housing property type, human remains and cultural items including funerary objects, sacred objects, and objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act; and Indian Sacred Sites as defined in Executive Order 13007.



## XIII. MITIGATION MEASURES

- The Army's proposed Program Comment will include mitigation measures as steps that the Army will take to ensure the effects of its management actions are considered and resolved.
- The Army's proposed mitigation measures meet the intent of *historic preservation* as it is defined in the NHPA and are commensurate with the significance of this housing.
- The mitigation measures include:
  - **Public Education:** The Army will maintain a website containing information about the history of the Army Vietnam War Era housing for public educational purposes. The Army will use social media (Twitter) to distribute information on Vietnam War Era historic housing and Army historic preservation to the public.
  - **Research and Historic Context Development:** The Army will conduct additional in-depth professional research and prepare additional nation-wide Army Vietnam War Era housing historic context information.
  - **Inventory, Evaluation, and Documentation:** The Army will conduct additional inventory, evaluation and documentation of representative architectural styles, design elements, associated buildings and structures, and landscape features. The mitigation measure will provide this information for **100%** of installations with the Vietnam War Era housing property type and includes evaluation of Properties of Particular Importance.
  - **Treatment of Properties of Particular Importance:** The Army will, in coordination with the ACHP, seek to identify Vietnam War Era housing that may have particular importance. Once identified the Army will conduct additional documentation of those properties as a preservation measure, with long-term preservation through continued use as military housing.
  - **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.



## **XIV. EFFECT AND DURATION**

- The effect of the Program Comment is to provide the Army with a means of programmatic compliance with the NHPA 54 USC 306108 for the repetitive management actions occurring on this large inventory of similar property types by means of the alternative program procedures under 36 CFR 800.14(e), in lieu of conducting individual project reviews under 36 CFR 800.4 through 800.7.
- By adhering to the terms of the proposed Program Comment, the Army will meet its responsibilities for compliance with NHPA 54 USC 306108 (Section 106) for management actions associated with Vietnam War era housing, associated buildings and structures, and landscape features.
- In order to synchronize and integrate with ongoing business practices and land management arrangements, the Program Comment is proposed to remain in effect for 33 years from the anticipated date of issuance in 2022 through 2055. The 33-year effective period for the proposed Program Comment coincides with the term of the ground leases that have been executed with the Army's privatized housing partners under the RCI program. Over 99% of Army's Vietnam War era housing is privatized and operated under RCI.
- The Program Comment will remain in effect during that 33-year period unless the Army determines that such comments are no longer needed and notifies the ACHP in writing, or the ACHP withdraws the Program Comment in accordance with 36 CFR 800.14(e)(6).
- Upon termination of the ground lease in 2055, ownership of all RCI partnership owned improvements including all housing located within the boundaries of the ground lease is automatically conveyed back to the Army.



## XV. BENEFITS OF THE PROGRAM COMMENT

- **MORE CONSISTENT AND VALUE-ADDED PRESERVATION OUTCOMES:** The Program Comment delivers the appropriate Army-wide perspective to address this class of related property types. It addresses historic significance based on research at an appropriate Army-wide scale and viewpoint, and affords more consistent and value-added treatment, mitigations, and preservation outcomes relative to the current project-by-project review process.
- **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 directly improves the quality of life, health, and safety of the Army families living in Vietnam War era housing.
- **HISTORIC AND ARCHITECTURAL CHARACTER DOCUMENTED:** The Army inventory a sample of Vietnam War era housing from installations nation-wide to document examples of Vietnam War era housing, associated buildings and structures, and landscape features creates a more complete information set. The Army will also identify and any Vietnam War era housing of particular importance and may further document that housing.
- **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 help ensure that this historic housing remains a viable mission asset and continues its historic function as housing.
- **CONTRIBUTION TO SCHOLARSHIP:** New in-depth research on the history and architecture of American housing will be made available to academic researchers and the general public and provide a significant contribution to historic preservation scholarship for this historic property type that has not been researched on a nation-wide basis.
- **IDENTIFICATION AND PRESERVATION OF PROPERTIES OF PARTICULAR IMPORTANCE:** Any properties of particular importance will be identified by the historical research and inventory, will be addressed in coordination with the ACHP, and may be 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.



## XVI. CONCLUSION AND NEXT STEP

- With this final 22 June 2022 consultation conference, the Army concludes the Public Participation phase of the Program Comment process. The Army will now move to the next phase, Preparation and Submission of the Program Comment to the ACHP.

