



**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY**  
**INSTALLATIONS, ENERGY AND ENVIRONMENT**  
**110 ARMY PENTAGON**  
**WASHINGTON DC 20310-0110**

August 26, 2022

Mr. Reid Nelson  
Executive Director (A)  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Via email to [rmelson@achp.gov](mailto:rmelson@achp.gov)

**CLEARED**  
**For Open Publication**

Sep 08, 2022

Department of Defense  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

Dear Mr. Nelson,

The purpose of this correspondence is to request Advisory Council on Historic Preservation (ACHP) action on the Department of the Army's (Army) proposed *Program Comment for Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)* (Program Comment). In accordance with 36 CFR 800.14(e)(5), the Army requests ACHP action on the proposed Program Comment at the ACHP Fall Business Meeting on October 26, 2022.

The intent of this Program Comment is to address the Army's National Historic Preservation Act (NHPA) Section 106 compliance requirements for our nation-wide inventory of over 7,500 Vietnam War Era homes in a manner that balances historic preservation requirements with our responsibility to provide the thousands of military families who live in this modern historic housing with the quality of life, health, and safety they require and deserve. The Program Comment for Army Vietnam War Era housing meets the spirit and intent of the NHPA, satisfies the Army's statutory obligations, is responsive to 21<sup>st</sup> century challenges, and will help build public confidence in the historic preservation process.

The enclosed Program Comment document *Overview and Text of the Program Comment for Department of the Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)* is submitted in support of the Army's request for ACHP action. The document is divided into two major sections. Section I, *Overview of the Program Comment* provides the contextual information necessary to understand the rationale for the Program Comment. Section II, *Text of the Program Comment* is the actual Program Comment text developed in response to extensive public consultation and in coordination with ACHP staff members.

The Army has a unique challenge among Federal agencies in managing NHPA Section 106 compliance for its inventory of historic housing. The Army has 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 late 18<sup>th</sup> century to the modern historic housing of the late 20<sup>th</sup> century that is the subject of this proposed Program Comment. The Army's historic housing represents a diverse inventory of American domestic architectural styles with highly varied

levels of 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.

The Army's NHPA compliance strategy for its current inventory of over 30,000 historic homes applies different regulatory approaches and standards that are consistent with the large and diverse inventory of historic Army housing property types and their varying levels of integrity and historic significance. The Army has pursued Program Comments in accordance with 36 CFR 800.14(e) for its large inventory of modern historic housing including the Program Comment for Army Capehart Wherry housing (1949-1962) and the Program Comment for Army Inter-War Era housing (1919-1940). The Army is now seeking a Program Comment for its modern historic housing from the Vietnam War Era (1963-1975). The Army does not intend to seek Program Comments for its more historically significant inventory of pre-1919 housing and plans to continue to follow the project-by-project review process in 36 CFR 800.3 - 800.7 and existing installation-level NHPA compliance agreements for pre-1919 historic housing.

The Army implemented an extensive planning, public participation, and consultation process for the Program Comment for Army Vietnam War Era housing. The Army followed the ACHP Program Comment Panel recommendations and developed a Program Comment Plan in coordination with ACHP staff. The Army then implemented a nationwide eight-month public participation and consultation effort informed by the Program Comment Plan and appropriate to the subject matter and scope of the action.

On March 28, 2022, the Army provided a Program Comment update and status report to the ACHP members the Federal Agency Programs (FAP) Committee. That update identified the scope, development process, public participation, and the ongoing nationwide consultation. On June 28, 2022, ACHP staff provided the members of the FAP Committee an additional status report on the Program Comment. At that time, the Army also provided a comprehensive Program Comment briefing that was posted on the ACHP's members internal share-drive to further inform the ACHP membership. That briefing included a complete summary of the background, intent, scope, and content of the Program Comment, photographs of representative examples of the property type from installations across the country, the public participation and consultation process, actions the Army implemented in response to consulting party requests and concerns that arose during consultation, response to comments where mutual agreement was not feasible, and proposed mitigation measures.

During its public participation and consultation, the Army sought, discussed, and considered the views of all consulting parties and where feasible, the Army reached agreement with consulting parties, implemented changes, and took additional actions regarding numerous matters arising during the consultation. This nationwide outreach effort afforded the public and interested parties the opportunity for extensive consultation on all aspects of the Program Comment. The Army also kept the ACHP membership fully informed on the progress, scope, and content of the Program Comment during its lengthy development period.

The proposed Program Comment for Army Vietnam War Era housing is designed for the 21st century. It is a holistic approach to the management of thousands of recurring undertakings on this large inventory of modern historic homes. It is prioritized to improve the quality of life, health, and safety of the thousands of Army families living in the housing; responsive to the needs of the Army's vast and growing inventory of modern historic housing; supports implementation of climate change adaptations for housing; and its flexibility provides a consistent, efficient, and effective historic preservation process. The Program Comment is appropriately calibrated to the character and qualities of historical significance of Vietnam War Era housing, includes properly focused mitigation measures, is synchronized with ongoing Army real property business management practices, and helps ensure long-term preservation of the housing.

Thank you for your continued support and interest in the care and well-being of our Soldiers and their families.

Sincerely,

David Guldenzopf, Ph.D.  
Department of the Army Federal Preservation Officer

Enclosure