



Section 106 Standard Treatments: A Program Alternative

Project
#06-313

Background:

Standard Treatments, as defined in 36 CFR 800.14, *Protection of Historic Properties*, may present an alternative to case-by-case compliance with Section 106 of the National Historic Preservation Act (NHPA). Under this regulation, the Advisory Council on Historic Preservation (ACHP) may establish standard methods for the treatment of a category of historic properties, a category of undertakings, or a category of effects on historic properties. As per the regulation, the ACHP may issue standard treatments on its own, or issue them in response to a federal agency request. The Navy is the lead agency for this Department of Defense (DoD) effort.

Objectives:

This project aims to develop Standard Treatments for repair and maintenance of building materials and systems common to historic military buildings. The goal is to reduce compliance timeframes and encourage use of the Secretary of the Interior's Rehabilitation Standards. The process involves consultation with the ACHP and additional stakeholders, as defined in 36 CFR 800.14. Should standard treatments be authorized by the ACHP, the Navy, acting as project lead for the DoD, will initiate the process to adopt the treatments as Unified Facilities Criteria (UFC).

Summary of Approach:

This project focuses on creating standard treatments for categories of undertakings, namely the types of projects listed below. The Navy worked with the ACHP and stakeholders to determine a final list of standard treatments with an appropriate level of detail.

The proposed approach created detail construction specifications relevant to rehabilitation undertakings that can be used in a stand alone effort or incorporated into a larger rehabilitation effort.

The proposed standard treatments will address:

- 1.Exterior masonry
- 2.Windows
- 3.Roofing materials
- 4.Exterior wood elements

A total of 73 draft standard treatments were created and divided into smaller, more manageable groups for the purposes of review and comment. The first group of 20 addresses exterior masonry rehabilitation.

The Navy utilized the Secretary of Interior's *Standards* and existing information from the National Park Service (NPS) and other appropriate sources to define the standard treatments. Furthermore, the Navy investigated the process to adopt standard treatments as DoD UFC. By incorporating standard treatments as UFC, the Military Services will enable broad distribution of, and compliance with, this valuable preservation-related approach. The key UFC audience is those DoD engineers, architects, and design professionals who may not be familiar with preservation technology, despite frequent work with historic properties.

The Navy has coordinated this project with the DoD Historic Preservation Working Group and will continue to prepare and present informational and status briefs as requested to parties outside DoD. Should the ACHP authorize standard treatments, the Navy will request designated technical points of contact from the other military services to serve on a Discipline Working Group (DWG), as defined by the DoD UFC process. Together, this DWG will pursue UFC drafting and implementation.

Accomplishments to Date:

Military cultural resource representatives have been working with ACHP personnel at the staff level to develop the framework for standard Treatments, since none have yet been issued. Additionally, the National Trust for Historic Preservation and the National Conference of State Historic Preservation Officers have been consulted and they offered support for the effort. The National Park Service provided valuable technical review and input. At this point, the ACHP has issued a federal register notice seeking public comment the first 20 standard treatments and the ACHP membership may likely vote on issuing this initial group of standard treatments at its next meeting.

To date, the ACHP has not issued standard treatments. This presents a rare opportunity for DoD to proactively address NHPA Section 106 compliance through a new regulatory mechanism.

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