



February 22, 2023

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001
ATTN: Megan Borthwick, ACHP Program Analyst/Army Liaison
Via email: Armycomments@achp.gov

Re: Notice of Public Review Period for Proposed Program Comment for Army Vietnam War Era Housing (1963-1975)

Dear Ms. Borthwick:

The American Cultural Resources Association (ACRA), the trade association for firms that specialize in cultural resource management (CRM), appreciates this opportunity to comment on the Department of the Army's *Proposed Program Comment for Army Vietnam War Era (1963-1975) Historic Housing, Associated Buildings and Structures, and Landscape Features*.

ACRA member firms undertake much of the legally mandated CRM studies and investigations in the United States and employ thousands of CRM professionals, including anthropologists, archaeologists, architectural historians, historians, and an increasingly diverse group of other specialists. To help guide smart, sustainable economic development and safeguard important historic and cultural heritage assets, ACRA members apply specialized research skills within a framework of federal, state, local, and/or Indian Tribal laws and regulations, facilitating an open dialog where every stakeholder has a voice.

Section 106 of the National Historic Preservation Act (NHPA) is the cornerstone federal policy that balances the need to build our nation's infrastructure with the need to preserve our past. CRM professionals and their clients respect the Section 106 process because it provides a clear, consistent roadmap to enable projects to move forward while considering their impact on the country's diverse cultural heritage. Communities value the process because Section 106 gives citizens a voice in preservation.

Program comments are a useful tool to enable the Council to address the Section 106 impacts of a group of similar undertakings instead of addressing each on a case-by-case basis. However, program comments should be approved only for repetitive management actions that do not lead, inadvertently or otherwise, to the destruction of buildings and other assets of historical or cultural significance. To that end, ACRA would like to raise a number of concerns about the Program Comment:

- ACRA recognizes the Army's urgent need to improve the living conditions of our nation's service members, and that a Program Comment for management actions like facilitating maintenance, repair, rehabilitation, renovation, and abatement of hazardous materials is appropriate.

ACRA also recognizes the reality that for some historic structures, demolition and new construction may be the only viable solutions in order to ensure adequate housing conditions. However, ACRA believes that in situations where the Army believes that demolition and new construction is warranted, the letter and spirit of the NHPA demand that such undertakings undergo consultation as required by Section 106.

- ACRA is concerned about the Program Comment's reliance on the term "Properties of Particular Importance (PPI)," as that term has no legal meaning in federal preservation law or regulations. It does not appear in the National Historic Preservation Act, the National Register of Historic Places, the ACHP 800 regulations, or anywhere else. Such new designations risk creating confusion around federal preservation efforts, and, lacking any force of law or regulation, could leave historic properties at risk of significant adverse effects.
- ACRA is concerned that a single Program Comment encompassing all Vietnam Era (1963-1975) housing does not take into account the full range of residential building types, neighborhood plans and design directives associated with this era. Furthermore, each neighborhood is the sum of more than just its buildings and, as noted in the historic context, includes site plan, neighborhood design, and landscaping. ACRA believes that consideration should be given to each specific residential building type and how they are combined or arranged within neighborhoods.
- The Program Comment states that Army Vietnam War Era housing is not eligible under Criterion C because it "has been extensively altered to the degree that it lacks architectural design integrity." However, the available documentation does not substantiate this statement.

ACRA appreciates having this opportunity to comment on the Army's Proposed Program Comment.

Sincerely,



Amanda Stratton
Executive Director