



November 22, 2023

Office of the Assistant Secretary of the Army for Installations,
Energy and Environment
110 Army Pentagon
Room 3E464
Washington, DC 20310

ATTN: DASA-ESOH (Dr. David Guldenzopf)
Via email: david.b.guldenzopf.civ@army.mil

**Re: Program Comment Plan for Preservation of Pre-1919 Historic Army Housing,
Associated Buildings and Structures, and Landscape Features**

Dear Dr. Guldenzopf:

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 *Program Comment Plan for Preservation of Pre-1919 Historic Army 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 federal agencies to consider a group of similar undertakings to be addressed under the Section 106 process, instead of addressing each undertaking individually. Programmatic comments consider repetitive management actions that would not lead, inadvertently or otherwise, to the destruction of buildings and other assets of historical or cultural significance.

ACRA is encouraged by the fact that the Program Comment Plan for Pre-1919 structures and features excludes adverse effect actions, such as demolition, cessation of maintenance and new construction. This is, as the Army notes, a departure from other Army program comments. ACRA believes that, in situations where the Army determines that demolition and new construction are warranted, the letter and spirit of the NHPA demand that such undertakings undergo consultation.

Likewise, ACRA is pleased that the Program Comment Plan does not rely on the term “Properties of Particular Importance” (PPI), which was used in its Proposed Program Comment for Army Vietnam War Era (1963-1975) Historic Housing, Associated Buildings and Structures, and Landscape Features. PPI lacks legal meaning in federal preservation law and regulations.

Although ACRA recognizes that there are financial benefits of the use of imitative materials, and in some cases the Army needs to replace historic building materials for hazard abatement purposes, it is important that the use of historic materials not be erased from history. ACRA suggests that the Army consider ways to ensure documentation of historic materials when they are replaced, or explore restoring a select group of structures using historic materials while using imitative materials on the remaining buildings. Such replacements should be investigated using the Secretary of the Interior’s Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction.

ACRA appreciates having this opportunity to comment on the Army’s Program Comment Plan.

Sincerely,



Amanda Stratton
Executive Director