



## Section 106 Standard Treatments as Program Alternatives

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.

### Objectives:

This project aims to develop Standard Treatments for repair and maintenance of building materials and systems common to historic military buildings. 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 Department of Defense (DoD), will initiate the process to adopt the treatments as Unified Facilities Criteria (UFC).

### Summary of Approach:

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

The proposed approach is to follow a format similar to that found in the "Illustrated Manual for Repair and Maintenance of Historic Military Family Housing in Hawaii – August 2002" (Legacy Project # 02-115). This is an illustrated guide that translates the *Secretary of the Interior's Standards for the Treatment of Historic Properties* into building materials and protocols specific to Hawaii's historic military family housing.

The proposed standard treatments will address:

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

\*The above list will require agreement, via consultation, with stakeholders.

The Navy will utilize 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 will investigate 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 will coordinate 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:

Navy and Army cultural resource representatives met with ACHP staff to discuss the issuance of standard treatments for specific types of military resources and building materials. The ACHP staff was receptive to the idea of examining pertinent categories of undertakings and categories of resources most applicable to military installations. 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.

A draft first submission, including a list of proposed specifications and a single sample specification is now available for review. Next steps include engaging the NPS and other pertinent stakeholders, to include the National Conference of State Historic Preservation Officers and the National Trust for Historic Preservation.

### Contact Information:

Mr. Brian J. Lusher  
Architectural Conservator and Historian  
Naval Facilities Engineering Command - ENV  
1322 Patterson Avenue, SE,  
Washington Navy Yard, DC 20374  
(202) 685 9290; (202) 685-1671 fax;  
[brian.lusher@navy.mil](mailto:brian.lusher@navy.mil)