

# Undertakings Affecting Historic Resources

**A**S OF THE DATE OF THIS ICRMP (FY01), there are 501 historic buildings and structures and 9 historic landscapes on Fort Bragg (referred to as “Historic Resources” in this SOP). For a summary of these resources, please refer to Chapter 5. For a complete list of these resources, see Appendix VIII: *Historic Resources Inventory*.

## Policy

Resources that are eligible for or listed on the NRHP will be managed IAW the Secretary of the Interior’s Standards for the Treatment of Historic Properties (36 CFR § 67), and in consultation with the North Carolina SHPO. Sections 106 and 110 of the NHPA will also be complied with in the management of historic resources. Resources determined ineligible for nomination to the NRHP are not affected by this SOP.

## Definition

As per Section 2 of Appendix B of DA Pam 200-4, Cultural Resources Management (1OCT98), an undertaking is defined as (but not limited to):

1. Construction
2. Land alterations
3. Building demolition
4. Building renovation
5. Building or landscape maintenance and management
6. Building abandonment or termination of maintenance
7. Changing the use of a facility in a way that could alter its character
8. Training that involves the use of land, airspace over land areas, or buildings

## Procedures

### Identification of Historic Resources

All undertakings (to include work orders, maintenance requests, and/or contracts) affecting historic landscapes will be flagged in such a manner as to identify that resource as protected under NHPA:

1. The Installation Facilities System (IFS) database software for Fort Bragg will be updated to ensure that all resources listed in Appendix VIII: *Historic Resources Inventory* are annotated with an “H” identifier, indicating that the resource is historic.
2. Stakeholders of historic resources not using the IFS database will be provided a list as presented in Appendix VIII.
3. All stakeholders of historic resources of Fort Bragg will be provided with an orientation packet explaining the consultation process involved for undertakings affecting historic resources

### Historic Preservation Consultation Process

Any Ft. Bragg activity that constitutes an undertaking affecting historic resources is subject to review by the CRP, in consultation with the NC SHPO and the Advisory Council on Historic Preservation, with the following considerations:

1. The CRM will be notified by the project proponent of any intended undertaking affecting resources listed in Appendix VIII: *Historic Resource Inventory*. This will be accomplished through an application form (see Appendix XX: *Historic Resource Work Checklist*) and will include the following information:
  - a. Resource to be affected
  - b. Description of proposed work to be performed
  - c. Category of work (maintenance, repair, alteration, or demolition)
  - d. Interior and/or exterior photographs (good resolution digital images are acceptable) of resource/resource elements to be affected (as the proposed work dictates)
  - e. Specification sheets for any materials to be used
  - f. Scopes of work, plans, cost estimates, bid schedules, design calculations, and design narratives, if applicable
2. Once notified of intent, the CRP will review the provided documentation. A reply will be provided by the CRP to the project proponent within five (5) working days concerning CRP action. During this five day period, the CRP may request additional information or documentation of the undertaking as listed in lines 1a. – 1f. above.
3. Once the CRP has reviewed the application, a memorandum outlining the undertaking will be completed and transmitted to the NC SHPO for

comment and consultation. Within thirty (30) calendar days of the receipt of the consultation request from Ft. Bragg, the NC SHPO will respond in writing as follows:

- a. That Ft. Bragg may proceed with the proposed undertaking without further consultation. In this instance, the CRP will notify the project proponent that the undertaking may continue; or
  - b. That Ft. Bragg must initiate and complete consultation with the SHPO before the undertaking may proceed. If the NC SHPO fails to respond within thirty calendar days, the CRP will assume SHPO concurrence and notify the project proponent that they may proceed with the undertaking without further consultation.
4. If the response to Ft. Bragg from the NC SHPO requests consultation, both parties will consult in good faith to arrive at mutually agreeable and appropriate measures that Ft. Bragg will implement to mitigate any adverse effects associated with the proposed undertaking. These measures will be detailed in a Memorandum of Agreement (MOA) to be signed by Ft. Bragg, NC SHPO, and any other interested parties as applicable. If the NC SHPO indicates that a MOA is necessary, the CRP will notify the project proponent that the undertaking is to be halted until an MOA can be completed and implemented.
  5. If an MOA can not be resolved, Ft. Bragg will, at a minimum, undertake recordation of the property IAW the Secretary of the Interior's standards for recordation or other mutually agreed-upon standards between Ft. Bragg and the NC SHPO. If an MOA can not be implemented, the CRP will notify the project proponent of the recordation requirement, and the undertaking may proceed pending receipt of the agreed upon recordation.
  6. If the adverse effects can not be mitigated via an MOA, the consultation process will end, and the Advisory Council on Historic Preservation (ACHP) will be notified and their comment sought. There is no time limit for ACHP comment.

#### Economic Analysis of Historic Resources

AR 200-4 requires that historic buildings and structures considered for demolition and replacement be subject to an economic analysis that explores the fiscal ramifications of reuse or replacement decisions. The NHPA requires that historic properties be considered for reuse to the maximum extent feasible. The decision to reuse, replace, or demolish a facility needs to be justified with a least cost, lifecycle economic analysis. When the economic analysis demonstrates that rehabilitation costs for historic properties exceed 70% of the building's replacement cost, replacement construction may be used. However, the 70% value may be exceeded where the significance of a particular historic structure warrants

special attention, such as an NHL, or if warranted by the life-cycle cost comparisons. The assessment of new construction must evaluate life-cycle maintenance cost and replacement cost as alternatives. Replacement cost shall not be based on replacement in kind, but shall be based on a design that is architecturally compatible with the historic property.

If the building or structure to be demolished is an historic property, potential reuses of the building must be analyzed prior to making the final decision to dispose of the property.

#### Layaway

It is important to recognize that for as long as the resource is considered on- or eligible for- listing in the NRHP, Fort Bragg has the responsibility to properly maintain the resource IAW the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. This means protecting, monitoring, and maintaining the resource regardless of function. Layaway, commonly referred to as "mothballing," is often an economically feasible alternative to constant maintenance or demolition. Layaway puts a building "on hold" until it can be reactivated and reused.

If a decision to layaway an historic building or structure is made, Fort Bragg will sequentially do the following:

1. Determine the length of time the property is likely to be in layaway. This will affect the type of work that will be undertaken and determine what level of maintenance is appropriate. The time periods can be divided into three categories-Short Term, 0-6 months; Mid Term, 6 months-2 years; and Long Term, over 2 years.
2. Determine the type of materials and the method of construction to be used:
  - a. Short Term Layaway: window and door closures will be at least 3/4" painted Marine Plywood.
  - b. Mid Term Layaway: closures will be at least galvanized and painted corrugated metal
  - c. Long Term Layaway: closures will be at least heavy gauge galvanized and painted metal.
3. Determine the current condition of the building through a Historic Building Condition Assessment Survey, outlined in *SOP# 10*.
4. Develop a Layaway Plan for the building or structure. This plan will at least consider:
  - a. the period of layaway;
  - b. the results of the building inspection;
  - c. environmental conditions;

- d. ventilation requirements;
  - e. building location; and
  - f. access.
5. Present the Layaway Plan and Building File to the NCSHPO for consultation. Actions taken to place a building or structure in layaway are defined as an “undertaking” by the NHPA and will be presented to the NCSHPO for comment and guidance (see “Historic Preservation Consultation Process” section, above).
  6. Complete the work as agreed upon through consultation by Fort Bragg and NCSHPO. This will be executed to ensure
    - a. that original building fabric is not damaged,
    - b. that, at the point of reactivation, the layaway work can be removed easily, and
    - c. that the layaway work itself will not contribute to deterioration of the building or structure.
  7. Continue to monitor the building or structure IAW the monitoring and plan outlined in *SOP #10: Historic Building Condition Assessments*.

#### Demolition

Demolition of an historic resource is always considered an adverse effect. When demolition is planned, the NC SHPO will be notified IAW the procedures listed above. At the NC SHPO’s recommendation, the regional offices of the Historic American Building Survey/Historic American Engineering Record (HABS/HAER) shall also be consulted for coordination and recommendations regarding appropriate mitigation procedures.

The consultation concerning demolition of an historic resource will proceed as listed above under “Historic Preservation Consultation Process” with the following additions:

Documentation provided to the CRP by the project proponent will include an economic analysis of the structure as defined above under “Economic Analysis of Historic Resources.” The analysis provided to the CRP is subject to the same review as other documentation. The CRP reserves the right to request clarification, more information, or a re-calculation (when justified) at any time during the 5 business day review period. Once transmitted to the NC SHPO for consultation and comment, the NC SHPO reserves the same rights of clarification and request for information during their 30 calendar day review process.

## Part 2: Standing Operating Procedures \_\_\_\_\_

An MOA will always be required prior to the initiation of any demolition activity. The CRP will notify the project proponent of this requirement upon receipt of the application for demolition.