

**DRAFT FINAL
PROGRAMMATIC AGREEMENT
AMONG
88 AIR BASE WING,
THE OHIO STATE HISTORIC PRESERVATION OFFICER,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING DISPOSITION OF HISTORIC HOUSING AT
WRIGHT-PATTERSON AIR FORCE BASE, OHIO**

WHEREAS, since 2000 the United States Air Force (USAF) and the 88th Air Base Wing (ABW) have studied ways to improve the Housing Program at Wright-Patterson Air Force Base (WPAFB), including livability and effectiveness as quality housing for USAF officers; past studies focused on using the authority granted by the Military Housing Privatization Initiative (MHPI; Public Law 104-106, 110 Stat. 554, Title XXVIII, Subtitle A, Section 2801, as amended) to improve housing quality; and

WHEREAS, 88 ABW owns and operates a 100 unit officers' family housing community which includes 89 Brick Quarters (BQHD) housing units, the Foulois House, and 10 other housing units along Yount Drive which were excluded from previous MHPI initiatives; and

WHEREAS, in 2014 the 88 ABW and the USAF initiated comprehensive planning to study and resolve major housing issues associated with the BQHD; and

WHEREAS, the 88 ABW is considering rehabilitation of the Foulois House, demolition of the ten Yount Drive Units, and 11 action alternatives generated under the associated National Environmental Policy Act (NEPA) environmental impact statement (EIS) regarding the BQHD, including the rehabilitation and modernization of at least 29 units for Key & Essential (K&E) leaders, leasing, privatization, and/or demolition (the undertaking); and

WHEREAS, 88 ABW has defined the area of potential effect (APE) as described in Attachment A; and

WHEREAS, the 88 ABW has determined that the undertaking may have an adverse effect on the Brick Quarters Historic District (BQHD), which is listed on the National Register of Historic Places (NRHP), and the Fairfield Air Depot Historic District (FADHD), as the Foulois House is a contributing resource to the FADHA, which is eligible for listing on the NRHP and has consulted with the Ohio State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, of the regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108); and

WHEREAS, the 88 ABW invited the Keweenaw Bay Indian Community, the Sac and Fox of the Mississippi in Iowa, the Saginaw Chippewa Indian Tribe of Michigan, Seneca Nation of Indians, and the Seneca Cayuga Tribe of Oklahoma, all federally-recognized tribes that have expressed interest in properties of traditional religious and cultural significance on WPAFB, to be consulting parties on this Programmatic Agreement (PA), and no Tribe indicated an interest in consulting on this undertaking; and

WHEREAS, the 88 ABW has consulted with the interested parties listed in Attachment C, and has invited them to comment and participate in the consultations to develop this PA; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the 88 ABW has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effects determination with specified documentation, and the ACHP has chosen to participate in this consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the 88 ABW has provided the public an opportunity to comment on the effects of the undertaking on historic properties, and has taken public comments into consideration during the NEPA process and in the Section 106 consultation for this undertaking, and

WHEREAS, because full effects of the undertaking cannot be determined prior to the Deputy Assistant Secretary of the Air Force (Installations), or a designee, selecting one of the alternatives, the 88 ABW, SHPO, and the ACHP elected to develop this PA pursuant to 36 CFR § 800.14(b)(1)(ii) in order to resolve adverse effects before the Final Environmental Impact Statement (EIS) and subsequent Record of Decision (ROD) in accordance with NEPA; and

WHEREAS, the 88 ABW consulted with the SHPO in 2016 and 2018 regarding demolition of ten Yount Drive Units and the minor rehabilitation of the Foulois House respectively, and parties concurred that there would be no adverse effect to historic properties; and

WHEREAS, this PA is expected to be amended in accordance with Stipulation VIII of this PA as consultations proceed through potential renovation, leasing, privatization, and demolition undertaking alternatives identified in the EIS and potential mitigation treatments; and

WHEREAS, the 88 ABW hosted a consultation meeting on October 17, 2018, at WPAFB, to discuss the proposed rehabilitation of the 29 units for the K&E personnel MILCON project, and given the expected exterior and interior alterations consulting parties concurred the project has the potential to adversely affect the BQHD, and possible mitigation measures were discussed; and

NOW, THEREFORE, the 88th Air Base Wing, SHPO, and the ACHP agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the potential effects of the undertaking on historic properties.

STIPULATIONS

The 88 ABW shall ensure that the following measures are carried out:

CONTINUED MAINTENANCE AND OPERATIONS

- 90 A. Upon execution of this PA, and until the Deputy Assistant Secretary of the Air
91 Force (Installations), or a designee, selects an alternative other than the “No
92 Action Alternative” in the EIS, any projects within the BQHD shall be reviewed
93 under Section 106 in the following manner.
94
- 95 B. The Cultural Resource Manager (CRM) shall review any proposed undertakings
96 within the APE and will make one of the following determinations:
97
- 98 a) The proposed undertaking is a project listed in Attachment B
99 “MILCON Renovation of 29 BQHD Units”, the CRM shall document this
100 determination for inclusion in the Annual Report, and the 88 ABW shall
101 follow the process in Stipulation II.
102
- 103 b) The proposed undertaking is a project listed in Attachment E, the
104 CRM shall document this determination for inclusion in the Annual
105 Report, and the 88 ABW has no further obligations under this Stipulation.
106
- 107 c) The proposed undertaking is not listed in either Attachment B or E,
108 the CRM shall meet Section 106 using the steps outlined in Stipulation III.
109
- 110 d) Only the CRM will make determinations about exempt
111 undertakings, and the CRM will be the primary person that consults with
112 SHPO.
113

114 **REHABILITATION OF 29 STRUCTURES FOR KEY AND ESSENTIAL (K&E)**
115 **PERSONNEL IN THE BQHD**
116

- 117 C. If the Deputy Assistant Secretary of the Air Force (Installations), or a designee,
118 selects the alternative to rehabilitate 29 BQ for K&E, the 88 ABW shall
119 implement the undertaking in the following manner.
120
- 121 D. The 88 ABW shall invite the SHPO to be involved throughout the entire design
122 process, providing timely review and comment in accordance with the USAF
123 design schedule. Specifically, the SHPO shall:
124
- 125 1. Attend the kickoff meeting with the USAF and its contractor after award
126 and notice to proceed in order to provide input into and gain awareness of the
127 design process.
128
- 129 2. Attend the design charrette and provide input for the design of the project.
130

- 131 E. The 88 ABW and its contractor shall take into consideration comments received
132 from the SHPO during the initial design charrette. The goal of consultation
133 regarding the design process is to strive to meet the Secretary of the Interior's
134 Standards for Rehabilitation wherever possible, while recognizing that some
135 aspects of the initial design concept may not meet those Standards.
136
- 137 1. The 88 ABW and its contractor shall provide the SHPO and consulting
138 parties concept verification documents as soon as available prior to the
139 35% design drawings. This is estimated to be ready in the middle of
140 August 2019 with 35% design drawings ready sometime in October 2019
141
- 142 2. The 88 ABW and its contractor shall provide the SHPO a draft schedule of
143 the design process with estimated completion dates for SHPO's planning
144 purposes.
145
- 146 F. The 88 ABW and its contractor shall provide the SHPO and consulting parties a
147 draft design termed Concept (35%) Design for review and comment. This is
148 estimated to be ready sometime in October 2019.
149
- 150 1. SHPO and consulting parties have 30 calendar days upon receipt to
151 provide written comments. Air Force shall provide copies of all consulting party
152 comments to SHPO or additional consulting parties upon request.
153
- 154 2. An internal meeting shall be held between 88 ABW and its contractors no
155 later than 7 calendar days after the comment period to review responses from
156 SHPO and consulting parties. Air Force responses to SHPO and consulting party
157 comments shall be returned to all consulting parties within 14 days of the
158 meeting.
159
- 160 3. Air Force may elect to conduct additional discussions at their discretion to
161 resolve any major issues raised by consulting parties before proceeding to Interim
162 (65%) Design.
163
- 164 G. The 88 ABW and its contractor shall provide the SHPO and consulting parties an
165 Interim (65%) Design for review no later than 120 calendar days after the
166 Concept (35%) Design meeting.
167
- 168 1. SHPO and consulting parties have 14 calendar days upon receipt to
169 provide written comments.
170
- 171 2. An internal meeting shall be held between 88 ABW and its contractors no
172 later than 7 calendar days after the comment period to review responses from
173 SHPO and consulting parties. Air Force responses to SHPO and consulting party
174 comments shall be returned to all consulting parties within 14 days of the
175 meeting.
176

- 177 H. The 88 ABW and its contractor shall provide the SHPO and consulting parties a
178 Final (95%) Design for review no later than 120 calendar days after the Interim
179 (65%) Design meeting.
180
- 181 1. SHPO and consulting parties have 14 calendar days upon receipt to
182 provide written comments.
183
- 184 2. An internal meeting shall be held between 88 ABW and its contractors no
185 later than 7 calendar days after the comment period to review responses from
186 SHPO and consulting parties. Air Force responses to SHPO and consulting party
187 comments shall be returned to all consulting parties within 14 days of the
188 meeting.
189
- 190 I. The 88 ABW shall provide the SHPO with Final drawings on disc and in half size
191 hard copies within 60 calendar days of completion.
192
- 193 J. The 88 ABW shall implement the following mitigation measures.
194
- 195 1. Support the NPS expansion of the boundary for the Dayton Aviation
196 Heritage National Historical Park to include both Wright Memorial Facility 40001
197 and the Arnold House Facility 30008. This requires administrative efforts by the
198 NPS in partnership with WPAFB, which may include congressional action
199 initiated by the NPS.
200
- 201 2. Rehabilitation and continued use of the Arnold House Facility 30008 as
202 the WPAFB Heritage Center, with work to be substantially complete within five
203 years of the ROD being signed.
204
- 205 3. Submit an NRHP nomination for the Arnold House Facility 30008 to the
206 Keeper of the NRHP within five years of the ROD being signed.
207
- 208 4. Green space behind BQ structures on Johnson and Metzger Drives will be
209 retained to accommodate a driveway for access to new garages. This represents a
210 means to minimize the number of garage demolitions required for construction of
211 new garages. 88 ABW will seek new uses for the existing garages to the
212 maximum extent possible. 88 ABW will retain existing garages to the maximum
213 extent possible.
214
- 215 5. The 88 ABW shall fund as part of the MILCON project initial research,
216 information gathering, organization, and review of materials required in
217 preparation for production of a WPAFB history documentary. Within five years
218 of the ROD being signed, 88 ABW will then seek out and contract with a
219 nationally recognized documentary producer to create a new 20 minute video in
220 anticipation of a future full length documentary history of WPAFB. Refer to the
221 Mitigation Treatment Plan for more detail (Attachment F).
222

223
224
225
226
227
228 **REVIEW AND RESOLUTION OF EFFECTS FROM ACTIVITIES OTHER THAN K&E**
229 **REHABILITATION**

- 230
231 K. If the Deputy Assistant Secretary of the Air Force (Installations), or a designee,
232 selects an alternative that includes privatization or a Section 111 lease of the
233 BQHD units, the 88 ABW shall notify all consulting parties in writing within 7
234 calendar days of the ROD being signed. The 88 ABW shall seek concurrence
235 from SHPO that the recommended mitigation measures listed in Attachment F are
236 still appropriate in scale for the selected alternative, through letter agreement.
237
238 L. If the Deputy Assistant Secretary of the Air Force (Installations), or a designee,
239 selects an alternative that includes demolition of BQHD units, the 88 ABW shall
240 notify all consulting parties in writing within 7 calendar days of the ROD being
241 signed. The 88 ABW shall seek concurrence from SHPO that the recommended
242 mitigation measures listed in Attachment F are still appropriate in scale for the
243 selected alternative, through letter agreement.
244
245 M. If the Deputy Assistant Secretary of the Air Force (Installations), or a designee,
246 selects an alternative that includes renovation or modification of BQHD structures
247 beyond those discussed in Stipulation II, the 88 ABW shall notify the SHPO in
248 writing within 7 calendar days of the ROD being signed. Section 106 consultation
249 shall take place in accordance with 36 CFR Part 800.3 through 800.7 when that
250 future project scope and schedule has been determined.
251

252 **DURATION**

253
254 This PA will expire 10 years from the date of its execution, or sooner if terminated, amended, or
255 superseded by execution of the selected alternative, with full completion of the associated
256 mitigation, in the ROD. Prior to such time, WPAFB may consult with the other signatories to
257 reconsider the terms of the PA and amend it in accordance with Stipulation VIII below.
258

259 **POST REVIEW DISCOVERIES**

- 260
261 N. If potential historic properties are discovered or unanticipated effects on historic
262 properties are found, the 88 ABW shall address these post-review discoveries in
263 accordance with 36 CFR § 800.13(b)(3). Consultation with Tribes on post review
264 discoveries involving properties of traditional religious and cultural significance
265 will follow applicable portions of 36 CFR Part 800 and any other applicable
266 laws/regulations.
267

- O. All cases of post review discoveries will be documented in the Annual Report.

ANNUAL REVIEW

- A. The 88 ABW shall provide the SHPO with an Annual Report on or before February 1st of each year following execution of this PA, summarizing activities carried out under the terms of this PA.
- B. The 88 ABW and the SHPO shall meet to review the Annual Report within 30 calendar days of the SHPO receiving the report.
- C. The Annual Report shall include:
1. A list of exempt undertakings in which no further consultation was required;
 2. A list of undertakings within the APE in which no historic properties were affected or adversely affected;
 3. A list of undertakings in which historic properties were affected but not adversely affected;
 4. A list of undertakings in which historic properties were adversely affected and documentation of associated mitigation;
 5. A list of post-review discoveries;
 6. Proposed scheduling changes;
 7. 88 ABW's identification of proposed amendments to the PA;
 8. Disputes and objections related to the terms of this PA;
 9. Updated maps to the PA to include newly identified historic properties; and
 10. Updated inventory of historic properties and historic status codes.
- D. The 88 ABW shall only provide the ACHP a copy of the Annual Report if it is proposing an amendment.
- E. The 88 ABW shall ensure that the Annual Report is available for public inspection on its Environmental Branch website, that interested members of the public are made aware of its availability, and that interested members of the public are invited to provide comments to the 88 ABW, the SHPO, and the ACHP (with the exception of any maps and information with locational and site type information regarding archaeological sites).

DISPUTE RESOLUTION

- A. Should any signatory(ies) to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, the 88 ABW shall consult with such party(ies) to resolve the objection. If the 88 ABW determines that such objection cannot be resolved, the 88 ABW will:

1. Forward all documentation relevant to the dispute, including the 88 ABW's proposed resolution, to the ACHP. The ACHP shall provide the 88 ABW with its advice on the resolution of the objection within 30 calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the 88 ABW shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. The 88 ABW will then proceed according to its final decision.
 2. If the ACHP does not provide its advice regarding the dispute within the 30 calendar day time period, the 88 ABW may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the 88 ABW shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the PA, and provide them and the ACHP with a copy of such written response.
- B. The 88 ABW responsibilities to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.
- C. Should any member of the public raise a timely and substantive objection pertaining to the manner in which the terms of this PA are carried out, at any time during its implementation, the 88 ABW shall account for the objection by consulting with the objector to resolve the situation. When the 88 ABW responds to an objection, it shall notify the consulting parties of the objection and the manner in which it was resolved. The 88 ABW may request the assistance of (a consulting party) to resolve an objection.

AMENDMENT

Signatories to this PA may amend it by submitting proposed amendments to all other signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

TERMINATION

If any Signatory to this PA determines it will not or cannot be carried out, that party shall immediately consult with the other Signatories to attempt to develop an amendment per Stipulation VIII, above. If agreement on the proposed amendment cannot be reached within 30 calendar days (or another period agreed to by all Signatories), any Signatory may terminate the PA upon written notification to the other Signatories.

FISCAL REQUIREMENTS AND SOURCES

- A. The stipulations of this PA are subject to the provisions of the Anti-Deficiency Act, 31 U.S.C. 1341. If compliance with the Anti-Deficiency Act alters or impairs the 88 ABW's ability to implement the stipulations of this PA, the 88 ABW will consult in accordance

359 with the dispute resolution, amendment, or termination stipulations as specified in
360 Stipulations VII through IX.
361

- 362 B. Consistent with the Anti-Deficiency Act, any requirement for the payment or obligation
363 of funds by the USAF in connection with this PA shall be subject to the availability of
364 appropriated funds, and nothing herein shall be interpreted to require obligation or
365 payment of funds in violation of the Anti-Deficiency Act, and nothing in this document is
366 intended to bind the USAF to commit, obligate, appropriate or spend funds in violation of
367 the Anti-Deficiency Act and other applicable laws respecting federal funding. The USAF
368 compliance with this PA is strictly subject to budget limitations and availability of funds.
369 However, the 88 ABW agrees to aggressively seek sufficient funding through established
370 procedures to fulfill its obligations under this PA.
371
372

EXECUTION of this PA by the 88 ABW, SHPO, and ACHP and implementation of its terms evidence that the 88 ABW has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

UNITED STATES AIR FORCE, WPAFB

By: _____ Date: _____

Thomas P. Sherman
Colonel, USAF
Commander
Wright-Patterson AFB

OHIO HISTORIC PRESERVATION OFFICE

By: _____ Date: _____

Amanda Schraner Terrell
Director, Historic Preservation Office &
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: _____ Date: _____

John M. Fowler, Executive Director
Advisory Council on Historic Preservation

CONCURRING PARTY:

NATIONAL PARK SERVICE

By: _____ Date: _____

Kendell Thompson, Superintendent
Dayton Aviation Heritage National Historical Park
National Park Service

419
420

ATTACHMENT A
HISTORIC PROPERTIES AFFECTED BY THIS UNDERTAKING

BRICK QUARTERS
STREET ADDRESS
ZIP CODE 45433

	TYPE UNIT	UNIT NO.	GARAGE NO.
BREENE			
409	F DUPLEX	10330-A	11517
411	F DUPLEX	10330-B	11517
419	H SINGLE	10329	11516
427	H SINGLE	10327	11515
435	G SINGLE	10325	11515
443	G SINGLE	10323	11514
451	H SINGLE	10321	11514
459	H SINGLE	10319	11513

BRETT

409	E DUPLEX	10432-A	11527
410	E DUPLEX	10332-A	11517
411	E DUPLEX	10432-B	11527
412	E DUPLEX	10332-B	11517
419	H SINGLE	10401	11518
420	H SINGLE	10301	11509
427	H SINGLE	10403	11519
428	G SINGLE	10303	11510
435	G SINGLE	10405	11519
436	F DUPLEX	10304-B	11510
438	F DUPLEX	10304-A	11511
443	G SINGLE	10407	11520
444	G SINGLE	10309	11511
451	H SINGLE	10409	11520
452	H SINGLE	10311	11512
459	H SINGLE	10411	11521

CHANDLER

409	F DUPLEX	10632-A	11546
410	F DUPLEX	10532-B	11537
411	F DUPLEX	10632-B	11546
412	F DUPLEX	10532-A	11537
419	H SINGLE	10601	11538
420	H SINGLE	10501	11528
427	H SINGLE	10603	11539

CHANDLER (Cont'd)

428	H SINGLE	10503	11529
435	E DUPLEX	10604	11539
436	G SINGLE	10505	11529
437	E DUPLEX	10604-B	11540
444	G SINGLE	10507	11530
445	H SINGLE	10509	11540
452	H SINGLE	10609	11530
453	H SINGLE	10611	11541
460	H SINGLE	10511	11531

JOHNSON

409	E DUPLEX	10530-A	11537
411	E DUPLEX	10530-B	11537
419	A SINGLE	10524	11536
427	C DUPLEX	10522-A	11535
429	C DUPLEX	10522-B	11534
437	D DUPLEX	10520-A	11534
439	D DUPLEX	10520-B	11533
447	A SINGLE	10518	11532
513	C DUPLEX	10702-A	11553
515	C DUPLEX	10702-B	11548
523	A SINGLE	10704	11548

LAHM CIRCLE

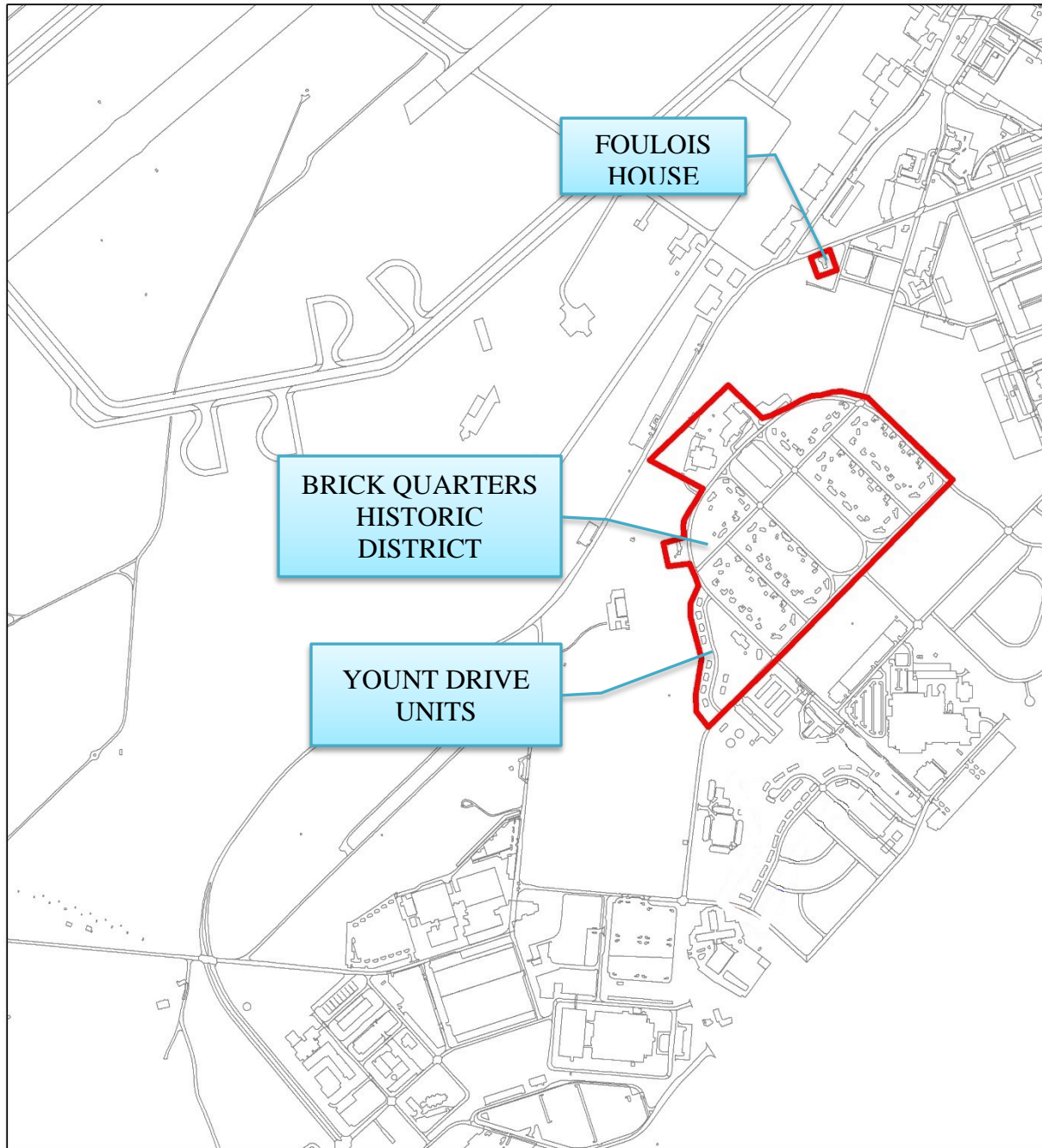
531	B SINGLE	10700	11547
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PEARSON

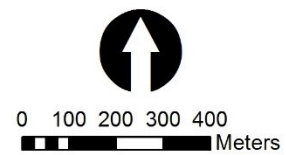
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708	E DUPLEX	10616-A	11541
715	F DUPLEX	10712-B	11551
717	F DUPLEX	10712-A	11550
725	G SINGLE	10715	11552
730	F DUPLEX	10516-A	11532
732	F DUPLEX	10516-B	11531
733	A SINGLE	10716	11553
807	G SINGLE	10817	11558
815	G SINGLE	10815	11557
816	F DUPLEX	10416-B	11522
818	F DUPLEX	10416-A	11521

PEARSON (Cont'd)	E DUPLEX	10812-A	11557
823			
825	E DUPLEX	10812-B	11513
830	E DUPLEX	10316-A	1152
832	E DUPLEX	10316-A	11556
833	G SINGLE	10811	11556
841	H SINGLE	10809	11555
 METZGER			
410	F DUPLEX	10430-B	11527
412	F DUPLEX	10430-A	11527
420	A SINGLE	10424	11526
428	D DUPLEX	10422-B	11525
430	D DUPLEX	10422-A	11524
438	D DUPLEX	10420-B	11524
440	D DUPLEX	10420-A	11523
448	A SINGLE	10418	11522
514	D DUPLEX	10802-B	11558
516	D DUPLEX	10802-A	11554
524	A SINGLE	10804	11554
 SCHLATTER			
410	E DUPLEX	10630-B	11546
412	E DUPLEX	10630-A	11546
420	H SINGLE	10629	11545
428	H SINGLE	10627	11544
436	G SINGLE	10625	11544
444	G SINGLE	10623	11543
452	H SINGLE	10621	11543
460	H SINGLE	10619	11542
 FOULOIS HOUSE			
WRIGHT AVE.			
88 WRIGHT AVE	FARM UNIT	30088	

ATTACHMENT A - AREA OF POTENTIAL EFFECTS (APE)



APE
 APE



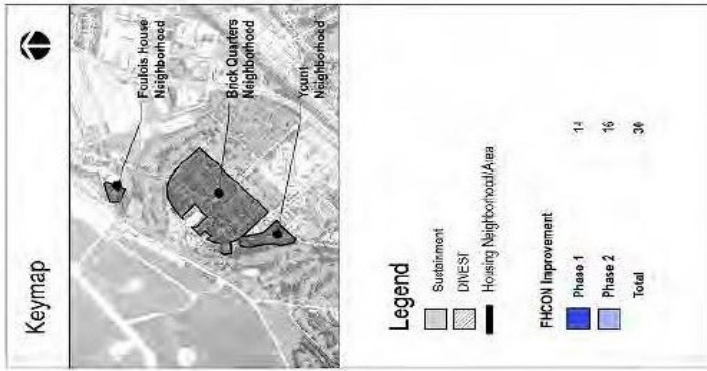
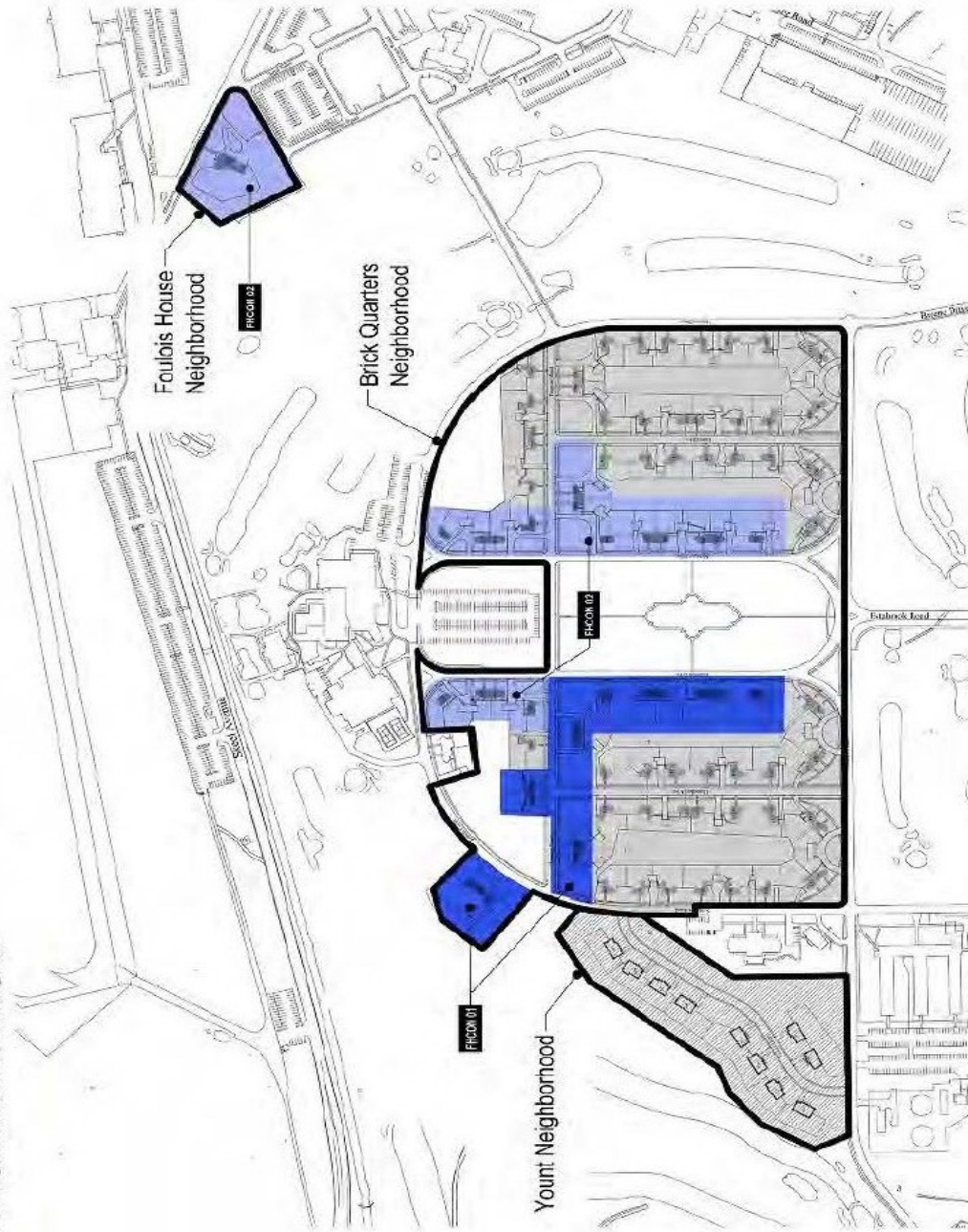
ATTACHMENT A

PROPOSED MILCON MAP



ATTACHMENT B
MILCON RENOVATION OF 29 BQHD UNITS

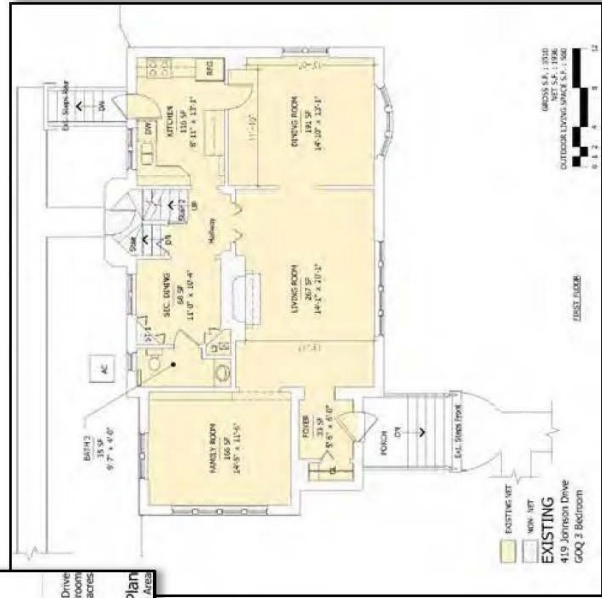
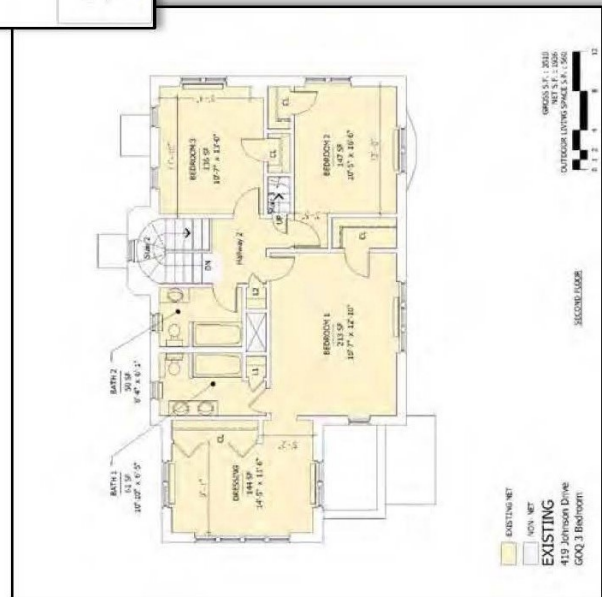
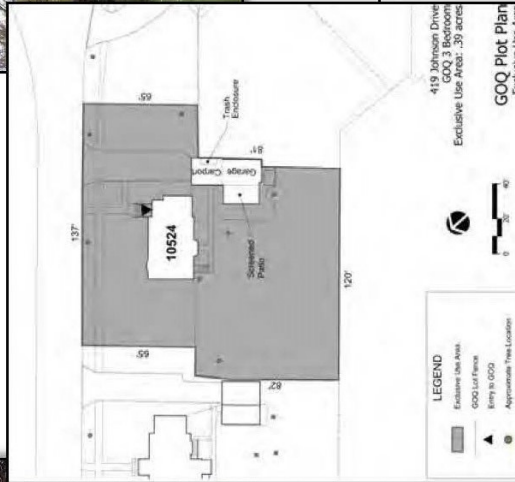




NOT TO SCALE

Proposed FHCON and FHOM Phasing Plan
Wright-Patterson AFB

419 Johnson Drive – Unit Type A
Currently – SOQ 3BR



419 Johnson Drive - Unit Type A
Proposed - GQQ 4BR



Planned Improvements:

- K&E Improvements (30 units)
 - Additions – to meet grade bedroom and size standards
 - Garages – replaced to meet AF standards
- Whole-House Level Improvements (all units)
 - Infrastructure – replace electrical wiring, sanitary piping, water distribution, and ductwork
 - Exterior – repair roofs, repair exterior lintels, replace windows (not yet replaced), replace windows to meet escape requirements
 - Interiors – replace doors, trim, cabinets, plaster, and update all finishes
 - Lot – replace patio covers and fences, remove old ballots



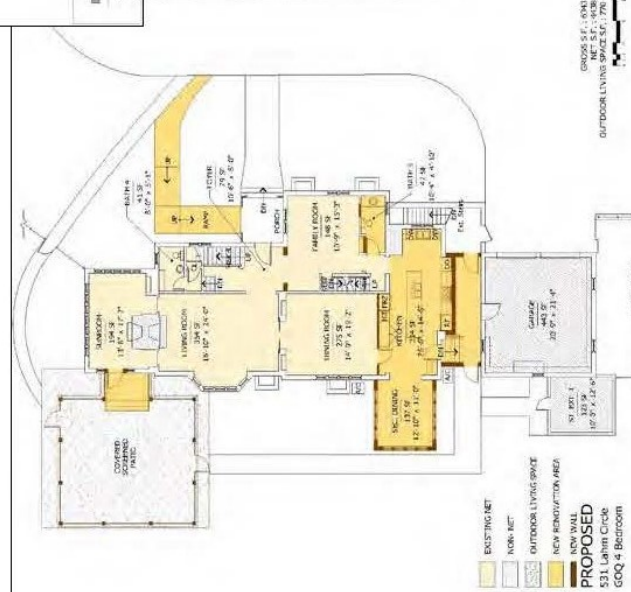
531 Lahrn Circle - UnitTypeB
Currently - 6BR GQ



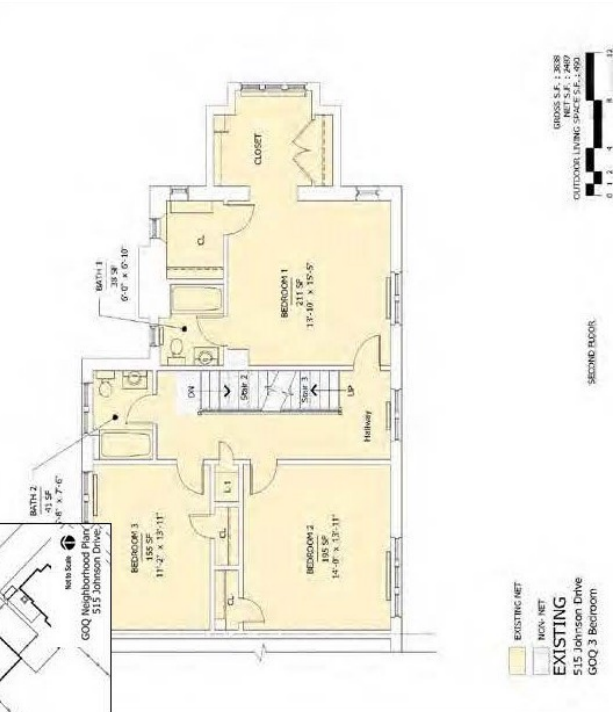
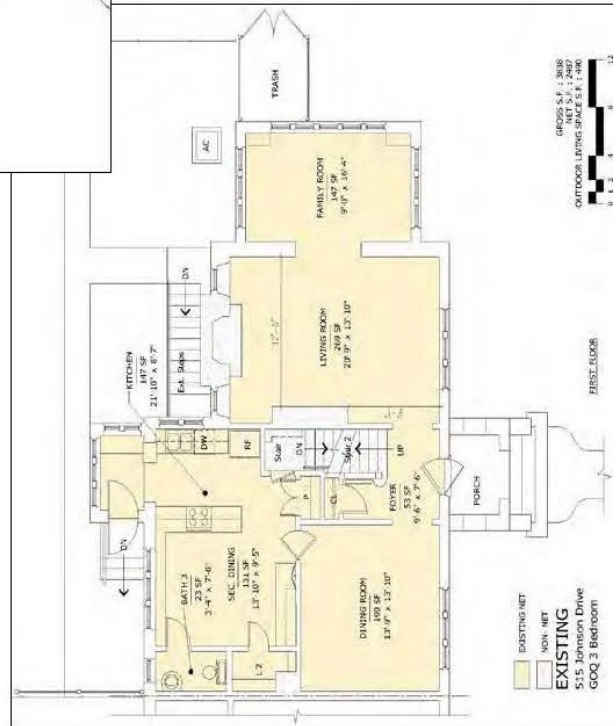
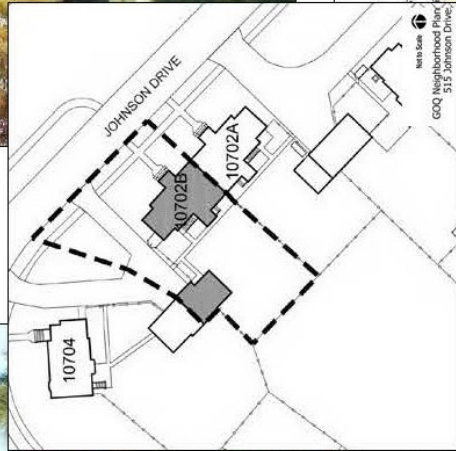


Planned Improvements:

- K&E Improvements (30 units)
 - Additions – to meet grade bedroom and size standards
 - Garages – replaced to meet AF standards
- Whole-House Level Improvements (all units)
 - Infrastructure – replace electrical wiring, sanitary piping, water distribution, and outwork
 - Exterior – repair roofs, repair exterior: intels, replace windows (not yet replaced), replace windows to meet escape requirements
 - Interiors – replace doors, trim, cabinets, plaster, and update all finishes
 - Lot – replace patio covers and fences, remove old patios



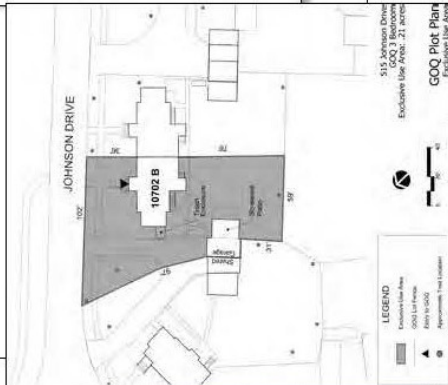
515 Johnson Drive - Unit Type C
Currently - 3BR/2.5B



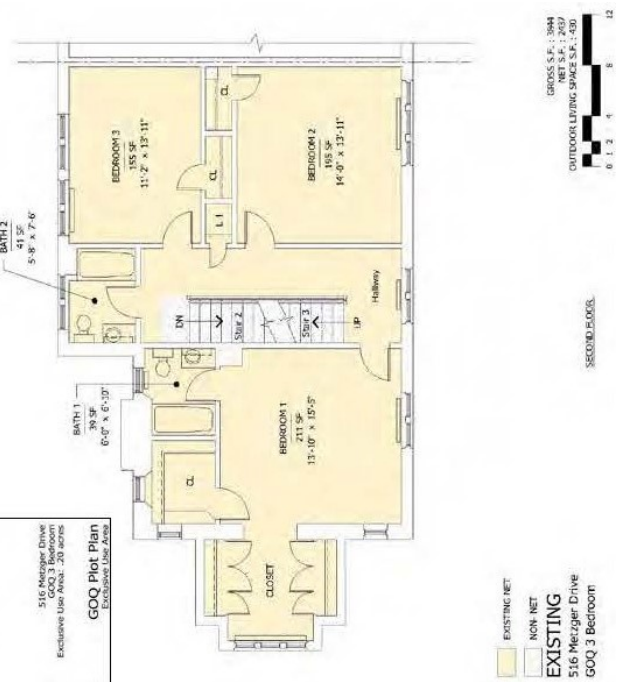
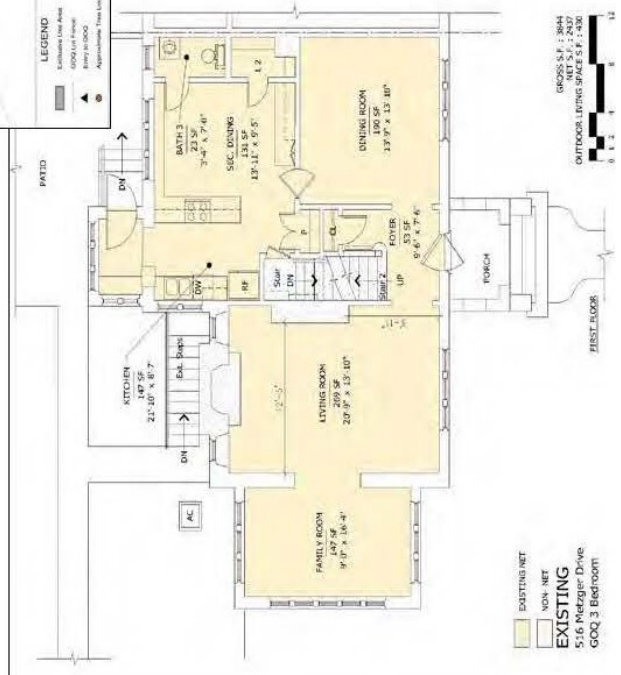
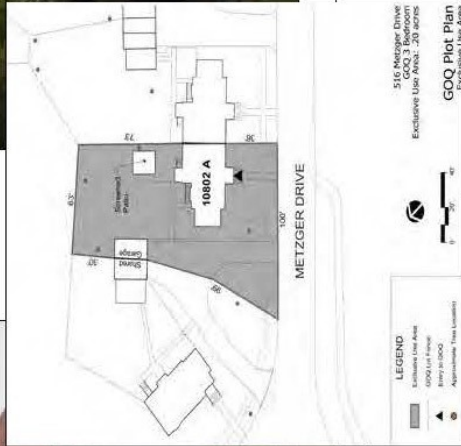
Planned Improvements:

- K&E Improvements (30 units)
- Additions – to meet grade bedroom and size standards
- Garages – replaced to meet AF standards
- Whole-House Level Improvements (all units)
 - Infrastructure – replace electrical wiring, sanitary piping, water distribution, and ductwork
 - Exterior – repair roofs, repair exterior intels, replace windows (not yet replaced), replace windows to meet escape requirements
 - Interiors – replace doors, trim, cabinets, plaster, and update all finishes
 - Lot – replace patio covers and fences, remove old patios

- **K&E Improvements (30 units)**
 - **Additions** – to meet grade bedroom and size standards
 - **Garages** – replaced to meet AF standards
- **Whole-House Level Improvements (all units)**
 - **Infrastructure** – replace electrical wiring, sanitary piping, water distribution, and cuctwork
 - **Exterior** – repair roofs, repair exterior intels, replace windows (not yet replaced), replace winccows to meet escape requirements
 - **Interiors** – replace doors, trim, cabinets, plaster, and upccale all finishes
 - **Lot** – replace patio covers and fences, remove old patios



516 Metzger Drive - Unit Type D
Currently - 3BR/GOQ

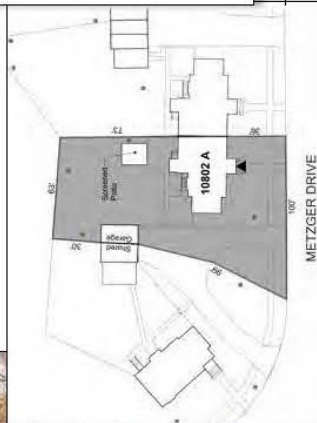


516 Metzger Drive - Unit Type D
Proposed - 4BR-GQ

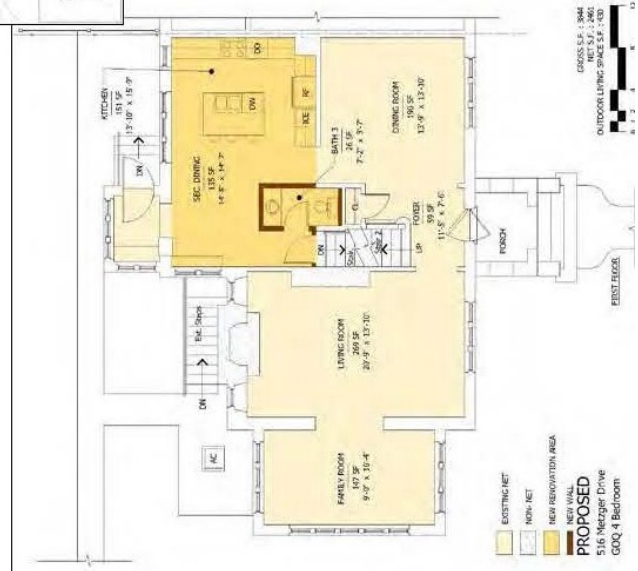


Planned Improvements:

- K&E Improvements (30 units)
 - Additions – to meet grade bedroom and size standards
 - Garages – replaced to meet AF standards
- Whole-House Level Improvements (all units)
 - Infrastructure – replace electrical wiring, sanitary piping, water distribution, and ductwork
 - Exterior – repair roofs, repair exterior lintels, replace windows (not yet replaced), replace windows to meet escape requirements
 - Interiors – replace doors, trim, cabinets, plaster, and update all finishes
 - Lot – replace patio covers and fences, remove old patios

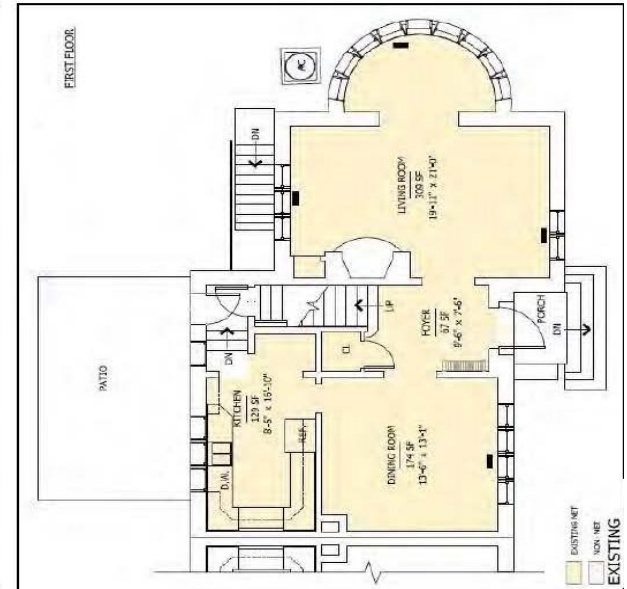


GROSS S.F.: 384
NET S.F.: 261
OUTDOOR LIVING SPACE S.F.: 480
0 1 2 4 8 12
SECOND FLOOR



GROSS S.F.: 384
NET S.F.: 261
OUTDOOR LIVING SPACE S.F.: 480
0 1 2 4 8 12
FIRST FLOOR

Unit Type E
Currently - 488 SQ.



Unit Type E
Proposed - 4BR GGD



Planned Improvements:

- **K&E Improvements (30 units)**
 - **Additions** – to meet grade bedroom and size standards
 - **Garages** – replaced to meet AF standards
- **Whole-House Level Improvements (all units)**
 - **Infrastructure** – replace electrical wiring, sanitary piping, water distribution, and ductwork
 - **Exterior** – repair roofs, repair exterior lintels, replace windows (not yet replaced), replace windows to meet escape requirements
 - **Interiors** – replace doors, trim, cabinets, plaster, and update all finishes
 - **Lot** – replace patio covers and fences, remove old patios



ATTACHMENT C
LIST OF ADDITIONAL CONSULTING PARTIES

Local/State

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Kendell_thompson@nps.gov

Ms. Mackensie Wittmer
National Aviation Heritage Area
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Phone: (937) 443-0165
mdw@aviationheritagearea.org

Mr. Brady Kress
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(567) 876-1914

Donna Martin, President
Preservation Dayton Inc.
mailto:Toytrader2@aol.com

Fairborn Area Historical Society
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Carol-Baugh@woh.rr.com

Heritage Ohio
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Aviation Trail, Inc.
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Dayton, OH 45402
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mchristianphoto@donet.com

National

David J. Brown
Executive Vice President and Chief Preservation Officer
National Trust for Historic Preservation
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Washington, DC 20037
(202) 588-6000
(800) 944-6847

ATTACHMENT D
RECORD OF DECISION (ROD)
(THE ROD WILL BECOME ATTACHMENT D TO THIS PA UPON ITS EXECUTION)

**ATTACHMENT E
EXCLUDED PROJECTS**

The categories of undertakings listed below were determined by the 88 ABW, the SHPO and the ACHP to meet the criteria for exclusion; i.e., they qualify as undertakings, but will have no effort on historic properties, or their effects will not be adverse. An undertaking of one or more of the types listed below will not require further Section 106 review with the SHPO, so long as the undertaking is limited to the types listed below and within the APE, and is not a part of another undertaking. In addition, if at any time in the course of the undertaking information becomes available that would make this procedure inapplicable, including but not limited to the discovery of historic properties or human remains, Section 106 review or other appropriate federal regulation shall be initiated by the 88 ABW. The CRM must review these undertakings prior to initiation of the project.

1) Temporary Activities

- a) Temporary installation of structures to provide access by disabled persons provided these changes make no permanent modification to contributing architectural or landscape elements and are in place for no longer than required by Air Force Instructions (AFIs). These temporary arrangements shall only be in place for the duration of the disabled person's occupancy.
- b) Temporary repairs to include only; temporary repairs to floor framing or flooring, temporary repair of falling ceilings, temporary bracing or shoring of structural members to prevent collapse, or temporary repairs to prevent water damage provided that if such work is done without permanent damage to the building or site. These temporary repairs shall normally be in place no more than six months.

2) Site Work

- a) Maintenance, repair, replacement in kind; painting of traffic control lines or curb painting; resurfacing of existing streets, roads, alleys, sidewalks, curbs, ramps, and driveways (asphalt to concrete is acceptable); and maintenance, repair, replacement in kind of street lights, and traffic signs.
- b) The CRM must approve of any removal or alterations to sizes, shapes, and contents of existing landscape beds and features. This includes maintenance and repair of existing landscape features, including replacements in kind or replanting of flowers and shrubs, tree and shrub trimming, fences, retaining walls and walkways, removal of dead/dying plant material, and and removal of invasive species.
- c) Repair and replacement of existing chain link fences that are compatible with neighborhood vernacular fences in terms of materials, style, scale, and color.
- d) Repair or removal of existing structures, within or adjacent to the historic properties identified in the *Cultural Resource Inventory Report of the Brick Quarters Historic*

District in Support of Wright-Patterson Air Force Base (July 2015), such as gazebos, pergolas, arbors, screened porches, etc. are exempt activities, provided the structures are not included in the character-defining features noted in the report. The inventory report is an attachment to the EIS and is available to the public upon request to the 88th Air Base Wing Public Affairs Office, 5135 Pearson Road, Building 10, Room 253A, Wright-Patterson AFB, Ohio 45433 (Phone: 937-252-3252 or E-mail 88abw.pa@us.af.mil).

- e) Repair or maintenance of existing historical markers within the BQHD.

3) Exterior Rehabilitation Activities

- a) Exterior scraping with non-destructive means (hand scraping and hand sanding and heat plates or heat guns to the next sound layer) and painting of wood siding, features, and trim.
- b) Repair or replacement in kind of clay tile, or metal/copper roofs; and replacement of a flat roof not visible from a public right-of-way.
- c) Repair or replacement in kind of historic attic vents in original openings and installation of new ridge vents when new roofing is installed.
- d) Installation of screens and storm windows, provided; they completely fill the original window opening, they match the meeting rail or other major division of the window, outside storm windows must not protrude beyond the face of the building, interior storm windows must not cause damage to the original interior trim, and interior storm windows must be designed to seal and protect the primary window from condensation damage.
- e) Installation of storm doors, if they are simple and undecorated, of a full-view type, and are anodized or painted to complement existing trim.
- f) Repair or replacement of in-kind of historic awnings matching existing materials and form.
- g) Replacement of windows with new wood window sashes having double-pane glass and spacer bars at the original muntin locations, to match the original sight lines as much as possible. The window frames shall be retained in place as was done with other window replacements within the BQHD.
- h) Repair of porches, cornices, exterior siding, doors, balustrades, stairs, or other trim as long as any new material matches existing features in composition, design, color, finish (paint, stain, etc.) texture and other visual and physical qualities.
- i) Repair of masonry foundations, walls, lintels or chimneys by re-pointing using matching mortar composition, hardness, texture, color, joint width and profile, only when mortar is missing or damaged.

j) Replacement in kind of gutters and downspouts (aluminum gutters and downspouts are permitted when not visible from the street and are the same size, with the same profile and are the same color).

k) Rebuilding of existing wheelchair ramps.

l) Caulking, for; weather-stripping, re-glazing and repainting of windows, provided the color of the caulking blends in with the building.

m) Repair of foundations and structural features of the building when the action does not require the removal or alteration of the historic architectural building fabric or the introduction of new kinds of materials not already present.

n) Installing new or relocating existing water, natural gas, and electric meters or communications and cable television (CATV) wiring on the side or back of the house, so that they are not visible from the street.

o) Replacement or repairs to the siding and roofing at the Foulois House.

4) Interior Rehabilitation Activities

a) Repair, replacement, and installation of electrical, heating, and ventilation (HVAC), plumbing, CATV and communication lines, and life-safety systems, where NO structural or decorative feature alteration, such as chair rails, baseboards, and including removal of existing plaster and lath, will be altered.

b) Any changes to the kitchen, bathrooms, bedroom closets, or basement spaces in historic properties, as long as such changes do not detract from the significant exterior or interior historic character-defining elements in rooms of the BQHD other than the kitchen, bathrooms, bedroom closets, or basement. This includes installation of new kitchen cabinets and countertops, closet organizers and installation of new bathroom fixtures and tile if no window openings or doors are altered.

c) Installation of insulation in floors and attics.

d) Repair of plaster walls and ceilings by patching plaster where possible, or repairing with drywall finish when plaster repairs are not feasible.

e) Reuse or replace in kind of trim work in its original location, when/where installing new, or replacing existing wall and ceiling surfaces.

f) Installation of simple standard light fixtures to replace non-original missing or broken interior and exterior lighting fixtures that are not original.

g) Replacement of carpet in bedrooms and other living areas, or refinishing of original wood flooring.

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- h) Installation of new ceiling openings for pull-down attic steps; removal and sealing up of obsolete pull-down attic steps.
- i) Lead-based paint and asbestos abatement activities, such as cleaning and vacuuming, that does not involve removal or alteration of structural, architectural, or decorative features.
- j) Control of insects, rodents, or other pests when the method used does not visibly affect the historic fabric of the building.

ATTACHMENT F
MITIGATION TREATMENT PLAN

**Mitigation Treatment Plan for Wright-Patterson Air Force Base Housing Program EIS –
REVISED JUNE 2019**

The Mitigation Treatment Plan (MTP) in support of the Wright-Patterson Air Force Base (WPAFB) Housing Program Environmental Impact Statement (EIS) is necessary because the proposed alternatives include potential impacts to the Brick Quarters Historic District (BQHD) built in the mid-1930s. The potential impacts range from the installation of rescue windows and new garages to demolition of almost the entire district. This document provides mitigation strategies to resolve adverse effects under the National Historic Preservation Act (NHPA).

Mitigation

Many Environmental Assessments (EAs) and EISs contain some type of mitigation to reduce the severity of the project's environmental impacts. Project proponents are responsible for implementation of any mitigation and for monitoring its effectiveness. This is an area that has received increased attention in recent years, as many agencies have not done a very good job of following through on commitments for mitigation. In addition, there is now increasing attention on the effectiveness of mitigation – has it reduced the impacts to the expected level? If not, will any follow-on mitigation implemented? There is also increasing pressure to grant public access to mitigation monitoring results, which is already permitted by Air Force regulations (32 CFR 989.22(b), which states “Upon request, the Environmental Planning Function (EPF) must also provide the results of relevant mitigation monitoring to the public.”)

For each Finding of No Significant Impact (FONSI) or Record of Decision (ROD) containing mitigation measures, the proponent prepares a plan specifically identifying each mitigation, discussing how the proponent will execute the mitigations, identifying who will fund and implement the mitigations, and stating when the proponent will complete the mitigation. The mitigation plan is be forwarded, through the MAJCOM EPF to HQ USAF for review within 90 days from the date of signature of the FONSI or ROD. Title 32 CFR 989.22(d)

Table 1 provides an overview of the eleven alternatives and the mitigation items identified as appropriate for the level of adverse effects expected for each alternative. The *Mitigation Treatment Plan for Wright-Patterson Air Force Base Housing Program EIS* (MTP), which was developed as part of the EIS process, contains some of the mitigation components listed in this Attachment. These mitigation items, some of which have previously been subject to consultation and supported as worthwhile activities, provide both Air Force and general preservation benefits. The mitigation items described in this current plan supersede the MTP that is in the Draft EIS.

TABLE 1

Alternative 1	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA (see MILCON Mitigation below and in the PA)
Alternative 2	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA (see MILCON Mitigation below and in the PA) - Demolitions require Mitigation Items: 1, 2, 3, 4, 5
Alternative 3	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA (see MILCON Mitigation below and in the PA)
Alternative 4	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA – Privatization see below
Alternative 5	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA (see MILCON Mitigation below and in the PA) – WPAFB does not view Section 111 as producing any adverse effects. Any future undertakings by the Section 111 lease holder shall follow standard Section 106 consultation.
Alternative 6	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA – see privatization below. - Future undertakings for the 60 units returned to Gov. shall follow standard Section 106 consultation at that time.
Alternative 7	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA (see MILCON Mitigation below and in the PA) – Demolitions require Mitigation Items: 1, 2, 3, 4, 5
Alternative 8	- MILCON Mitigation - Mitigation is specified in Stipulation II H 5 of the Programmatic Agreement (PA) and additional renovations are covered by the PA (see MILCON Mitigation below and in the PA) – WPAFB does not view Section 111 as producing any adverse effects. Future undertakings shall follow standard Section 106 consultation.
Alternative 9	Air Force has deemed this alternative non-viable – no

	mitigation
Alternative 10	Air Force has deemed this alternative non-viable – no mitigation
Alternative 11	No mitigation required

1

2 **Additional Analysis for Mitigation:**

3 Since it is possible that some combination of the alternatives presented above could be advanced
4 as the preferred alternatives selected in the ROD, a further analysis of possible demolition effects
5 should be considered if hybrid or phased alternatives are recommended for implementation. The
6 number of Key & Essential (K&E) leaders fluctuates periodically based on mission requirements
7 and commander perceived needs. Additionally, requirements for officer housing change
8 periodically also. This may lead to a variable number of units identified for retention or
9 demolition during the ten year term of this agreement, if an alternative with that action is
10 selected. Currently K&E has been identified as 50 individuals, a substantial increase from the
11 original number. Additionally, the commander has identified a need for ten units of distinguished
12 visitor (DV) quarters. That need can be met through the reuse of BQHD units, instead of
13 necessitating an additional planning and design effort to identify costs associated with selecting
14 potential sites for new construction and completing an additional environmental study.

15 **Retention of 60 units for K&E and DVs with Demolition of the remaining 29 units** – This,
16 as a possible alternative, would require a combination of mitigation items. Assuming the
17 MILCON renovation would remain for 29 units this would mean the mitigation identified in the
18 PA would suffice for those. The remaining 31 units would most likely receive some form of
19 renovation after the current MILCON. This would require further Section 106 consultation at the
20 time that it is identified as a selected alternative. The demolition of 29 units however would have
21 a severe adverse effect on the BQHD. The appropriate mitigation for this action would be either
22 Mitigation 1 alone, or Mitigation 2, 3, 4, and 5.

MITIGATION ITEMS

Mitigation 1: Interpretive Center Addition - Development of an expanded Huffman Prairie Flying Field Interpretive Center with a WPAFB heritage addition. This mitigation treatment would require an EA due to sensitivity of the site. Additionally, coordination with Dayton Aviation Heritage National Historical Park would be needed along with the redesign of NPS interpretive media within the facility. This mitigation treatment would need to be executed in partnership with the National Park Service. New interpretation media portraying the history of WPAFB would be designed and installed. This would include the reconstruction and interpretive display of the historic Five-Foot Wind Tunnel and installation of the German POW Mural and its interpretation. The proposed addition, approximately 13,000 square feet, and expansion of parking facilities would allow publicly accessible outreach and education regarding the history of WPAFB and the Brick Quarters Historic District. Projected cost for this mitigation is approximately 5.5 Million dollars.

Mitigation 2: Historical Mapping and 3D Virtual Rendering - Implementation of the historical mapping project noted by Wallander and Zeidler (WPAFB, 2016). A base wide historical mapping project is needed to graphically capture all previous buildings, sites, and structures at WPAFB using a variety of available historic maps as baseline data. The ability to graphically render past building campaigns (both permanent and temporary) would aid future master planning efforts. These data may be entered into a Geodatabase, which would allow the development of an interactive database with integration of historic photos and text. The development of a user-friendly interface would allow this database to be installed at the newly expanded interpretive center set forth in Item 1. Additionally, this data would provide the means for creation of a 3D rendered virtual reality program allowing user to view, walk through, fly over, and interact with the base during its high water mark in 1945. This requires development of a virtual reality and interpretive experience using “state of the art” virtual reality equipment that would allow the user to experience what life was like in the BQHD during the development of the modern US Air Force. This effort may require a partnership with Microsoft, Apple, or another virtual reality pioneer company who could use the project as a demonstration of their technology. The estimated cost for Mitigation 2 is approximately \$750,000.

Mitigation 3: WPAFB Documentary Film - Development of a documentary film that could be added to the WPAFB website or presented in a kiosk at a museum or library, and You Tube or Netflix type venues would provide public benefit. This would be a full feature professional documentary requiring the following: extensive research of the history of the airbase and its relationship to Dayton, the U.S. Air Force and the history of aviation. This would include obtaining archival images, video, and data, interviews, filming on site, professional narration, artwork, animation, sound, etc. This is the full implementation effort that would build on the mitigation item identified for the Brick Quarters MILCON renovation (Stipulation II.H.5) which would lay the groundwork for this final development of the documentary. The estimated cost for Mitigation 3 is approximately \$850,000.

Mitigation 4: National Historic Landmark (NHL) Improvements - Improvements to Huffman Prairie Flying Field NHL. These improvements would provide public benefit by improving the viewshed for visitors to the NHL and improving the site to more closely resemble the field when

the Wright Brothers flew there. This mitigation includes; burying the power lines within the viewshed, new vegetation screening of the storage building at the south edge of the field, removal of Pylon Road and its replacement with grid like paving substitute such as Stabilagrid that would allow grass to grow through, but still allow vehicles to travel over the grid. Additionally, this mitigation includes replacing the existing catapult replica with a more accurate replica, adding air conditioning to the storage building for year round storage of a flyer replica, addition of a powered door opener system for the storage building, and restoration of portions of the old Interurban railway embankment near Simms station including installation of rail ties and rails. The estimated cost for Mitigation 4 is approximately \$450,000.

Mitigation 5: 3D Laser Scanning – Utilize U.S. Army Corps of Engineers, Construction Engineering Research Laboratory (CERL) to conduct LIDAR scans of the entire Brick Quarters Historic District exterior and interior of the eight different unit types. Utilize CERL’s expertise in producing 3D imaging of the entire Brick Quarters. This technology allows production of 3D printing of a to-scale model of the entire historic district which is to be produced and placed on display along with interpretive media regarding the history of the Brick Quarters. The estimated cost for Mitigation 5 is approximately \$250,000.

MILCON Mitigation: These are the mitigation items called for in the PA under Stipulation II H 5

1. Support the NPS Expansion of the boundary for the Dayton Aviation Heritage National Historical Park to include both Wright Memorial Facility 40001 and the Arnold House Facility 30008. This requires administrative efforts by the NPS in partnership with WPAFB, which may include congressional action initiated by the NPS.
2. Rehabilitation and continued use of the Arnold House Facility 30008 as the WPAFB Heritage Center, with work to be substantially complete within five years of the ROD being signed.
3. Submit an NRHP nomination for the Arnold House Facility 30008 to the Keeper of the NRHP within five years of the ROD being signed.
4. Green space behind BQ structures on Johnson and Metzger Drives will be retained to accommodate a driveway for access to new garages. This represents a means to minimize the number of garage demolitions required for construction of new garages. 88 ABW will seek new uses for the existing garages to the maximum extent possible. 88 ABW will retain existing garages to the maximum extent possible.
5. The 88th ABW submit a project to fund initial research, gathering, organization, and review of materials required in preparation for production of a WPAFB history documentary. This would include research and development to tackle the following:
 - Read history of the airbase and its relationship to Dayton, the U.S. Air Force and the history of aviation
 - Make an assessment of the archives available to us, both on and off base
 - Make an outline for the structure and length of the documentary
 - Make a list of potential interviewees weighed against extant interviews

- Research and make a list of crucial interviews where time is a factor
- Identify and approach potential community/youth partners

Production and post production to deliver a short 20 minute trailer for the full documentary.

Section 111: If Section 111 is selected WPAFB does not view this as producing any adverse effects, so it is unlikely that any mitigation will be required to meet current design needs. Future undertakings proposed by the Section 111 lease holder shall follow standard Section 106 consultation.

Privatization: Currently WPAFB understands that privatization is not a viable alternative for the Air Force and therefore this is not expected to be selected. If however privatization would be selected future undertakings proposed by the privatization contractor shall follow standard Section 106 consultation at the time undertakings are proposed.