



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY
INSTALLATIONS, ENERGY AND ENVIRONMENT
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WASHINGTON DC 20310-0110

SAIE-ESO

4 March 2021

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Management of Army National Historic Landmarks

1. References:

- a. National Historic Preservation Act (NHPA) Title 54, U.S. Code (USC) 300101, et seq.
- b. 36 Code of Federal Regulations (CFR) 800, Protection of Historic Properties.
- c. Historic Sites Act of 1935; Title 16, U.S. Code 461 et seq.
- d. 36 CFR Part 65, National Historic Landmarks Program.
- e. Army Directive (AD) 2020-10, Use of Imitative Substitute Building Materials in Historic Housing, 25 August 2020.

2. National Historic Landmarks (NHLs) are a special type of historic property that possess exceptional national significance in American history, archeology, architecture, engineering, and culture, and are formally designated by the Secretary of the Interior, National Park Service. This memorandum defines Army historic preservation policy and procedures for the management of Army NHLs.

3. NHL Designation, Treatment, and Standard of Care:

a. NHLs are formally designated by the Secretary of the Interior through the procedures in 36 CFR 65. The Secretary of the Interior is the only government official with the authority to designate a property as a NHL. If a historic property has not been formally designated by the Secretary of the Interior as a NHL, it is not a NHL and it does not require the higher level of treatment and standard of care accorded to NHLs. Historic properties identified as “potential NHLs” or “eligible for NHL designation” by State Historic Preservation Office or National Park Service staff are not NHLs.

b. NHLs formally designated by the Secretary of the Interior have specific requirements for treatment and care under NHPA Section 110 (f) (54 USC 306107), and 36 CFR 800.10. The NHPA requires Federal agencies to exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs. The Army must, to the maximum extent possible and prior to approval of an undertaking that may directly and adversely affect any NHL, undertake planning and actions as may be necessary to minimize harm to NHLs and afford

the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the undertaking.

c. The Army must address any adverse effects of its undertakings on Army NHLs according to the NHPA (54 USC 306107) and following the procedures in 36 CFR 800.6 - 800.7, in addition to the special requirements for protecting NHLs at 36 CFR 800.10. Under 36 CFR 800.10, the Army must request that the ACHP participate in any consultation to resolve adverse effects to NHLs; notify the Secretary of the Interior, National Park Service of any consultation involving NHLs; and invite the Secretary of the Interior, National Park Service to participate in the consultation where there may be an adverse effect to NHLs.

4. Intent of AD 2020-10 Regarding Imitative Substitute Building Material Use in NHL Housing:

a. AD 2020-10 does not mandate the consideration of imitative substitute building material use in NHL housing, as it does for other historic Army housing. Equally, AD 2020-10 does not prohibit installations, activities, and privatized housing partners from proposing the use of imitative substitute building materials in NHL housing during NHPA Section 106 consultation on NHL housing projects.

b. The use of imitative substitute building materials in NHL housing should be proposed by installations, activities, and privatized housing partners during NHPA Section 106 consultation when the quality of life, health, and safety of NHL housing occupants is of concern, or where the use of historic building materials and in-kind building materials in NHL housing is not financially feasible.

5. NHL Identification and Expansion:

a. The National Park Service administers the NHL Program on behalf of the Secretary of the Interior. The Historic Sites Act and 36 CFR 65, authorizes and designates responsibility to the National Park Service to conduct NHL studies including survey, investigation, research, identification, and designation of NHLs through theme studies or special studies. These actions are conducted by the National Park Service using the authorized and programmed funds of their NHL Program. The National Park Service is the only Federal agency with the designated statutory and regulatory responsibility and specifically authorized funds to conduct such NHL identification and expansion activities.

b. In consideration of the legal authorities and financial resources designated to the National Park Service NHL Program to conduct NHL identification and expansion activities, Army Commands, installations, and activities should not program or expend Army financial resources, or agree in a NHPA Section 106 agreement pursuant to 36 CFR 800, to initiate or conduct NHL studies, theme studies, special studies, surveys, investigations, or research to identify new Army NHLs, expand existing Army NHL boundaries, or to include additional Army properties within an existing NHL.

6. Procedure to Request an Exception to Policy for NHL Identification and Expansion:

a. The identification and expansion of NHLs is an extensive activity that impacts Army NHPA compliance in terms of process time and complexity, consulting party involvement, and requires a significant financial expenditure. Such activities are appropriately conducted by the National Park Service NHL Program under their authorities and resources. Therefore, requests for exception to policy regarding programming and expenditure of Army resources to identify and expand NHLs, or agreeing to conduct those actions in a NHPA Section 106 agreement, must be justified by extraordinary circumstances and coordinated through higher headquarters to the Army Federal Preservation Officer (FPO).

b. Installations and activities will coordinate requests for exception to policy for identification and expansion of Army NHLs by means of a memorandum, endorsed at their higher headquarters by an appropriate O-6 / GS-15 level authority, to the Army FPO. Such coordination will occur prior to programming and expenditure of Army financial resources to initiate or conduct NHL identification and expansion activities, and prior to agreeing to conduct such activities in a NHPA Section 106 agreement.

c. The memorandum requesting the exception to policy must identify the extraordinary circumstances that apply to the specific situation as justification for Army funding and conduct of NHL identification and expansion activities. The memorandum must also indicate if there is an intent to include a requirement to conduct such activities in a NHPA Section 106 agreement.

d. Upon receipt of the endorsed request for exception to policy, the Army FPO will assess the justification of extraordinary circumstances and provide a written response to the requested policy exception. Requests for exception to policy that do not conform to the procedural requirements herein will be returned the originator without action.

7. Army NHLs formally designated by the Secretary of the Interior, National Park Service:

- Ladd Field NHL District, Fort Wainwright, AK
- Fort Huachuca NHL District, Fort Huachuca, AZ
- Pioneer Deep Space Station, Fort Irwin, CA (NHL is located on Fort Irwin but is managed by National Aeronautics and Space Administration under a NHPA Section 106 Programmatic Agreement)
- National War College, Fort McNair, DC
- Yuchi Town Archeological Site, Fort Benning, GA
- Palm Circle NHL District, Fort Shafter, HI
- Wheeler Field NHL District, Schofield Barracks, HI
- Fort Des Moines NHL District, Des Moines, IA (US Army Reserve Command is responsible for specific contributing elements only)
- Rock Island Arsenal NHL District, Rock Island Arsenal, IL
- Fort Leavenworth NHL District, Fort Leavenworth, KS
- Launch Complex 33, White Sands Missile Range, NM

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- Trinity Site, White Sands Missile Range, NM
- Watervliet Arsenal NHL District, Watervliet Arsenal, NY
- West Point NHL District, US Military Academy, West Point, NY
- Fort Sill NHL District, Fort Sill, OK
- Carlisle Indian School NHL District, Carlisle Barracks, PA
- Fort Douglas NHL District, Salt Lake City, UT (US Army Reserve Command is responsible for specific contributing elements only)
- Fort Myer NHL District, Fort Myer, VA, and
- Quarters 1, Fort Myer, VA.

8. This historic preservation policy memorandum is effective immediately. Inquiries regarding this memorandum should be addressed to the undersigned at david.b.guldenzopf.civ@mail.mil.



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Department of the Army Federal Preservation Officer

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