



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

May 30, 2025

Mr. Reid Nelson
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Dear Mr. Nelson,

The purpose of this letter is to formally notify the Advisory Council on Historic Preservation (ACHP) of the Department of the Army's intent to request a Program Comment for Army Warfighting Readiness, as authorized by Section 106 of the National Historic Preservation Act (NHPA) and 36 CFR 800.14(e). The Army's ability to rapidly, efficiently, and cost-effectively execute its warfighting readiness mission is critical to national security. This Program Comment, as previously discussed with ACHP staff, is designed to address challenges that significantly impact our readiness capabilities.

The Army is facing increasingly dynamic operational demands that require greater agility and responsiveness. Simultaneously, State Historic Preservation Offices (SHPOs) are experiencing resource constraints and staffing reductions, raising concerns about their capacity to conduct timely Section 106 project reviews (<https://ncshpo.org/2025/05/05/hpunderthreat/>). The combination of an accelerating operational tempo for Army readiness activities and decreasing SHPO capacity for timely Section 106 review is making the current project-by-project Section 106 compliance process outlined in 36 CFR 800.4-800.6 and Army installation Programmatic Agreements unsustainable. This process significantly impacts military readiness by delaying essential training, testing, and modernization activities; restricting access to crucial training and testing areas; and diverting resources away from the core military mission. A more modern and efficient approach is needed to ensure rapid response while upholding the Army's commitment to responsible cultural resource management.

The Army manages a substantial infrastructure portfolio, encompassing 13 million acres across 134 installations. This includes over 9 million acres dedicated to training and testing, more than 350,000 buildings and structures (totaling over 1.5 billion square feet), over 100,000 family housing units, and extensive transportation networks, including 25,000 miles of paved roads, 1,800 bridges, and 1,900 miles of railroad track, with an estimated replacement value of \$800 billion. This infrastructure is essential for supporting readiness training, weapons development, and testing. Furthermore, the Army's Organic Industrial Base, comprised of 23 depots, arsenals, and ammunition plants, is crucial for developing, manufacturing, and maintaining Army materiel.

Given this extensive infrastructure, the increasing operational tempo, and declining SHPO review capacity, the Army faces a disproportionate challenge in complying with NHPA Section 106 and 36 CFR 800, impacting our ability to maintain warfighting readiness.

The Army has a strong history of leadership in innovative Section 106 compliance and has a mature historic preservation program. Our four existing Army Program Comments covering our 30,000 historic homes enable the Army to effectively self-manage Section 106 compliance for historic housing through internal standards and guidelines. In addition, Army installations have completed archaeological site inventories on a remarkable 65% of Army lands, managing 84,000 recorded archaeological sites. The Army employs professionally qualified cultural resource managers at all levels in its organization, ensures all historic preservation work at installations is completed by qualified professionals, and maintains Integrated Cultural Resource Management Plans (ICRMP) at 124 installations. Army ICRMPs contain standard operating procedures for the inventory, evaluation, and treatment of historic and archaeological properties, which are implemented for Section 106 actions.

Building upon the success of existing ACHP approved Program Comments for Army historic housing, this Program Comment for Army Warfighting Readiness will extend a similar streamlined management approach to the Army's remaining historic properties. Specifically, it will extend historic housing standards and guidelines to other buildings, structures, and landscapes of similar age and will implement ICRMP standard operating procedures for archaeological properties, resulting in a more efficient and cost-effective implementation.

This Program Comment for Army Warfighting Readiness has the potential to be the most consequential of all Army and DoD Program Comments. It aims to streamline Section 106 compliance for Army readiness activities – the actions and processes undertaken to ensure units and soldiers are prepared for their missions. This includes actions affecting various historic resources, such as buildings and structures (excluding housing), archaeological sites, historic districts, and historic objects. Streamlining these processes is essential for maintaining a ready and responsive force.

The Army plans to submit the Program Comment to the ACHP in October 2025 for action in accordance with 36 CFR 800.14(e)(5). We look forward to continuing our collaboration with the ACHP on this important initiative.

Thank you for your continued support and interest in the care and well-being of our Soldiers and their families.

Sincerely,

David Guldenzopf, Ph.D.
Federal Preservation Officer for the
Department of the Army