



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

June 17, 2025

**INVITATION TO CONSULT:**  
**PROPOSED PROGRAM COMMENT FOR ARMY WARFIGHTING READINESS**  
**ACTIVITIES AND ASSOCIATED BUILDINGS, STRUCTURES, AND LANDSCAPES**

**I. INVITATION:**

On May 30, 2025, the Department of the Army Federal Preservation Officer (FPO) notified the Executive Director of the Advisory Council on Historic Preservation of the Army's decision to seek a *Program Comment for Army Warfighting Readiness Activities and Associated Buildings, Structures, and Landscapes* (Program Comment) in accordance with 36 CFR 800.14(e). This is an invitation from the Army FPO to potentially interested parties to participate in a series of virtual nationwide consultation conferences on the Army's proposed Program Comment.

**II. RESPOND BY JULY 10, 2025, TO PARTICIPATE AS AN INTERESTED PARTY IN THE ARMY PROGRAM COMMENT CONSULTATION:**

To participate as an interested party in the Army's Program Comment consultation, notify the Army FPO, Dr. David Guldenzopf via email to [david.b.guldenzopf.civ@army.mil](mailto:david.b.guldenzopf.civ@army.mil) by July 10, 2025. An interested parties list will be developed based on the email responses received to this invitation. Going forward after July 10, 2025, all Program Comment communications from the Army FPO will be addressed to those identified on the interested parties list. Additional information on the Program Comment is in section IV. below.

**III. CONSULTATION CONFERENCE SCHEDULE:**

An invitation to each consultation conference will be provided to identified interested parties. A Program Comment Plan will also be provided to inform the consultations. At each consultation conference, the Army will brief specific Program Comment topics, followed by open forum consultation. The weekly virtual consultation conferences will occur from **2:30-3:30 EST on Thursday** of each week as follows:

Consultation Conference #1: **17 July 25**  
Consultation Conference #2: **24 July 25**  
Consultation Conference #3: **31 July 25**  
Consultation Conference #4: **07 Aug 25**  
Consultation Conference #5: **14 Aug 25**  
Consultation Conference #6: **21 Aug 25**

**IV. ADDITIONAL PROGRAM COMMENT INFORMATION**

Army warfighting readiness activities includes military training, testing, and industrial activities, and the buildings, structures and landscapes associated with those activities. The proposed *Program Comment for Army Warfighting Readiness Activities and Associated Buildings,*

SUBJECT: Invitation To Consult: Proposed Program Comment for Army Warfighting Readiness Activities and Associated Buildings, Structures, and Landscapes

*Structures, and Landscapes* is designed to address and streamline the Department of the Army's (Army) compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800) for its warfighting readiness activities.

Issue: The current NHPA Section 106 project-by-project review process for historic preservation is unsustainable due to the Army's huge infrastructure, accelerating operational tempo, and decreasing State Historic Preservation Office (SHPO) review capacities. The Army is disproportionately affected by these issues due to the magnitude of our infrastructure subject to NHPA Section 106 review.

Proposed Solution: The Army proposes a Program Comment that establishes a comprehensive approach to managing warfighting readiness activities and historic properties associated with those activities.

Key Features:

- **Scope:** Covers Army warfighting readiness activities, including military training, testing, industrial activities and management actions for the buildings, structures, and landscapes associated with those activities.
- **Comprehensive Management:** Continues ongoing implementation of Army procedures for inventory, evaluation, determination of effect, and monitoring of historic properties within a military landscape context.
- **Standardized Approach:** applies ACHP approved Army historic housing procedures and guidelines to all historic Army buildings, structures, and landscapes of similar age.
- **Government-to-Government Relationship with Indian Tribes:** Maintains and continues all ongoing installation government-to-government relationships with Federally recognized Indian Tribes. Also maintains the ongoing consultative relationships between Army installations in Hawaii and Native Hawaiian Organizations.
- **Individual Project Reviews Continue:** Review of individual projects by SHPOs, Indian Tribes, Native Hawaiian Organizations, and interested parties continues to occur through the National Environmental Policy Act (NEPA) public review process.
- **National Historic Landmarks (NHLs):** Prioritizes avoiding adverse effects to NHLs and adhering to the Secretary of the Interior's Standards and Guidelines for Rehabilitation.
- **Mitigation:** Sets standard mitigation measures for adverse effects to historic properties. Provides for protective actions for archeological sites, and compensatory mitigation in lieu of standard mitigation measures.

**V. ARMY POINT OF CONTACT:** Dr. David Guldenzopf, Federal Preservation Officer for the Department of the Army, david.b.guldenzopf.civ@army.mil.