



CONSULTATION BRIEFING #3: PROGRAM COMMENT FOR ARMY WARFIGHTING READINESS ACTIVITIES AND ASSOCIATED BUILDINGS, STRUCTURES, AND LANDSCAPES

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Purpose

- To inform stakeholder consultation regarding the proposed *Program Comment for Army Warfighting, Readiness Activities, and Associated Buildings Structures and Landscapes*.
- Program Comment Website: <https://www.denix.osd.mil/army-pcwr/>

Consultation Conference No. 3 – Historic Properties Management

- I. Introduction
- II. Intent
- III. Inventory, Evaluation, Determination of Effect, Mitigation and Monitoring
- IV. Management of Pre-1941 Buildings
- V. Management of WWII and Cold War Era Buildings (1941 – 1989)
- VI. Mitigations
- VII. National Historic Landmarks
- VIII. Historic Properties Review Board

* Learn more about Department of the Army historic preservation and cultural resources by visiting www.denix.osd.mil/army-cr/home/.

Introduction

- As the largest military department within the Department of Defense (DoD), encompassing the active Army, U.S. Army Reserves, and the Army National Guard, the Army bears a broad national defense mission to provide combat-ready forces for the United States.
- Managing the largest portfolio of historic buildings in the DoD, and among all federal agencies, the Army's holdings include:
 - 13 million acres of land across 134 installations, including 9 million acres dedicated to military training and testing, and 84,000+ archeological sites
 - Over 350,000 buildings and structures, of which 122,000 support the Army's readiness mission and are subject to Section 106 of the National Historic Preservation Act (NHPA)
 - 20 National Historic Landmarks
- The Army boasts a robust and well-established historic preservation program with a strong, 40-year track record of continuous improvement in NHPA compliance. Demonstrated by:
 - NHPA integration into Army Regulation 200-1
 - NHPA policy memoranda and implementing guidance
 - 4 Program Comments and program alternatives
 - Employs over 300 historic preservation professionals across the Army

Intent

- The Army is rapidly modernizing through Continuous Transformation. This initiative will deliver critical warfighting capabilities, optimize the Army force structure, and eliminate obsolete programs.
- Continuous Transformation will accelerate modernization of Army warfighting readiness activities, which encompass military training, testing, equipping, and industrial operations, along with their associated infrastructure. This modernization effort aims to create a leaner and more lethal force.
- The proposed Program Comment will streamline the Army's compliance with Section 106 of the National Historic Preservation Act (NHPA) and 36 CFR Part 800 and will enable the Army to efficiently transform warfighting and modernize its infrastructure and maintain its competitive edge in a rapidly changing global landscape.

Inventory, Evaluation, and Determination of Effect, Mitigation, and Monitoring

- Qualified preservation professionals will follow current procedures for identification, evaluation, determinations of effect, and monitoring of historic properties.
- Inventory, evaluation, and mitigation will consider the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* and any state-specific standards for archeological properties.
- Historic property management actions will not occur in areas where there is a life safety risk. Adverse effects in areas containing UXO are considered an acceptable loss in consideration of the Army's historic preservation program.
- Installations may seek technical advice from SHPOs and traditional knowledge from tribal partners regarding management of historic properties.

Management of Pre-1941 Buildings, Structures and Landscapes: Exteriors

- Aligns with other ACHP-approved program comment guidelines and procedures for historic housing of the same age.
- Implements the *Secretary of Interior's Standards for Rehabilitation* through:
 - Design Guidelines in Appendix C.
 - Building Materials Catalog and Guidelines in Appendix D.
 - A standardized building materials selection procedure that ensures the balanced consideration of repair of historic building materials or, where repair is not possible, the use of in-kind building materials or substitute building materials.

Management of Pre-1941 Buildings, Structures and Landscapes: Interiors

- The significance of the interior of pre-1941 buildings and structures are tied to continuous transformation as they were constructed in response to changing military, technological, and life health and safety requirements.
- Interior spaces of historic properties do not derive significance from being static. Original floorplans have been altered through the addition of plumbing, electric, HVACs, and abatement of environmental hazards.
- To maintain their significance, the interiors must continue to develop and change in response to changing military needs. Interior spaces will, therefore, not undergo any special review or building materials requirements, or procedures to their alteration.
- This aligns with the way pre-1941 historic Army housing is currently being managed under the ACHP-approved Program Comments for pre-1919 and Inter-War era housing.

Management of WWII and Cold War Buildings, Structures and Landscapes (1941 – 1989)

- NHPA compliance for many historic properties constructed during WWII and the Cold War periods has already been completed under the following program alternatives:
 - 1) Programmatic Memorandum of Agreement for DoD WWII Temporary Buildings;
 - 2) Program Comment for Army Ammunition Production Facilities;
 - 3) Program Comment for Department of Defense WWII and Cold War Ammunition Storage Facilities; and the
 - 4) Program Comment for Unaccompanied Personnel Housing.
- Management actions for WWII and Cold War period buildings have been sufficiently addressed by existing program alternatives, associated historic contexts, and documentation and won't be subject to historic property management procedures unless they are National Historic Landmarks.
- The Program Comment website has a 244-page Army / DoD Cold War Bibliography. This bibliography contains references to the exhaustive studies of Cold War-era Army and DoD historic properties, including documentation from project specific actions, broad national-level historic contexts, and HABS/HAER and historical documentation of Cold War properties.

Standard Mitigations for Adverse Effects to Historic Properties

- The Army will prioritize avoidance of adverse effects. Where adverse effects cannot be avoided, the affected property will be subject to a Treatment Plan to mitigate adverse effects.
- Commands will review and approve treatment plans for non-NHL properties. Treatment plans will:
 - 1) Identify if the property type has been previously documented under other NHPA-related actions by the Army, DoD, or other entities or if a known better-preserved example of the property type exists;
 - 2) Indicate if prior documentation or a better-preserved property more adequately represents the significance of the property.
- Adverse effects to building, structures, and landscapes will be addressed through standardized documentation prepared to HABS, HAER, or HALS standards or to equivalent state-level standards. Once completed, mitigation documents will be made available to SHPOs and other stakeholders, as requested, and will be retained at the installation in accordance with document management standards.
- Adverse effects to archeological sites will be addressed by avoidance or data recovery in accordance with the Secretary of Interior's Standards and Guidelines for Archeology and Historic Preservation or state-level standards. Alternately, site protective measures such capping, signage, or monitoring may be utilized to mitigate, minimize, or avoid adverse effects.

Standard Mitigations for Adverse Effects to Historic Properties (cont.)

- To maximize resource efficiency, the Army will avoid duplicating mitigation efforts for historic properties adversely affected by its actions.
 - Treatment plans will determine if similar historic property types have been previously documented or if known better-preserved examples exist on the installation or elsewhere. If adequate documentation or preserved examples sufficiently represent the adversely affected property, they will be incorporated into the treatment plan to avoid redundant mitigation efforts.
- The Army may implement compensatory mitigation in lieu of the standardized mitigation measures for adversely effected historic properties.
 - Compensatory mitigation involves mitigative actions on properties other than those directly affected by the undertaking, or other types of creative offset mitigation activities.
 - Compensatory mitigation proposals will be incorporated into treatment plans but will not occur when standard mitigation options are implemented.
- The Army may issue contracts and carry out undertakings prior to the completion of mitigation measures so long as such actions do not preclude the eventual successful completion of the mitigation.
- Mitigation measures committed to in current PAs and MOAs but not yet carried out as of the date of ACHP approval of this program comment will be met by the relevant installation.

National Historic Landmarks (NHL)

- Army has 20 NHLs, including both individual properties and districts. Most were constructed by the Army and continue to serve the Army's national defense mission.
- Federal agencies will, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to NHLs.
- Army installations will avoid adverse effects to NHLs, to the maximum extent possible, in consideration of the exigencies of the military readiness mission.
- Warfighting readiness activities effecting NHLs will occur in accordance with the Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the NHPA (63 FR 20,496) standard and guidelines at 4(j), which states when alternatives to avoid an adverse effect on NHLs appear to require undue cost or to compromise the undertaking's goals and objectives, the agency must balance those goals and objectives with the intent of the NHPA.
- Installations will request the views of the National Park Service for NHLs subject to adverse effects to establish the appropriate level of HABS, HAER, or HALS documentation during the NEPA public review process.
- All adverse effect actions to NHLs, NHL Treatment Plans, and proposed NHL mitigations will be subject to a higher-level review standard at Headquarters, Department of the Army by the Army Historic Properties Review Board.

Army Historic Properties Review Board (HPRB)

- Army HPRB Purpose: Internal review, oversight, and issue resolution for historic property management.
- HPRB Composition: Army Federal Preservation Officer (FPO), Army Deputy FPO, and representative(s) from Army command-level. The FPO may invite additional experts.
- HPRB Activation: Convened by the FPO to address unresolved historic property issues and to review treatment plans for actions adversely affecting NHLs.
- Army FPO Determination: The FPO issues a written determination based on HPRB deliberations. Commands and installations must resource and implement required actions.
- NHL Treatment Plans: The HPRB reviews and endorses treatment plans for adverse effects to NHLs.
- Treatment Plan Revision: The HPRB can request revisions to treatment plans.
- FPO Endorsement: The FPO issues a written endorsement of the NHL treatment plan after considering HPRB input. Commands and installations must resource and implement the endorsed plan.

Q&A

SAVE THE DATE

Consultation Briefing #4: Consultation with Federally-recognized Tribes and NHOs, SHPOs, and Other Stakeholders

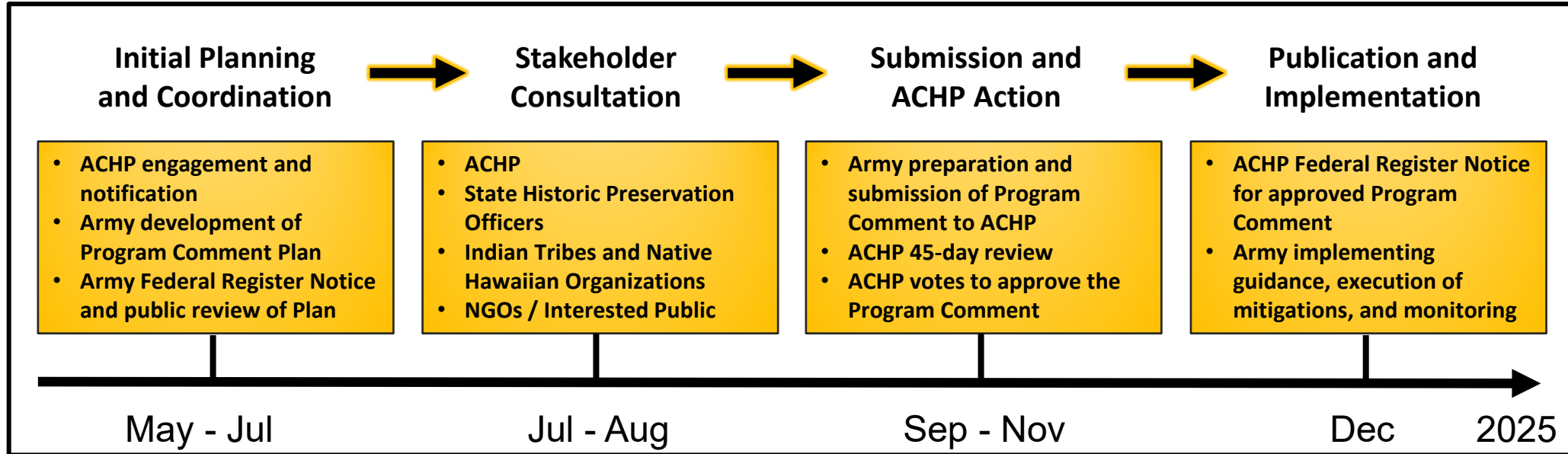
Date: Thursday, August 7, 2025,

Time: 2:30-3:30 pm EST

Upcoming Consultation Schedule

- **Consultation Briefing #4:** Consultation with Federally-recognized Tribes and NHOs, State Historic Preservation Officers, and Other Stakeholders
Date: Thursday, August 7, 2025, 2:30-3:30 pm EST
- **Consultation Briefing #5:** Mitigation of Adverse Effects and PC Administration
Date: Thursday, August 14, 2025, 2:30-3:30 pm EST
- **Consultation Briefing #6:** Summary, Closing Remarks, and Discussion
Date: Thursday, August 21, 2025, 2:30-3:30 pm EST

Program Comment Development Process and Schedule



On May 30, 2025, the Army FPO notified the Executive Director of the ACHP of its decision to seek a Program Comment for Army warfighting readiness activities, in accordance with Section 106 of the NHPA.

Army Historic Preservation Program Outreach

The Army has developed the following public websites and social media issuances to facilitate outreach:

- ARMY HISTORIC PRESERVATION AND CULTURAL RESOURCES MANAGEMENT
www.denix.osd.mil/army-cr/home/ The public web page for Department of the Army Historic Preservation and Cultural Resources Management.
- PROGRAM COMMENT FOR PRE-1919 HISTORIC ARMY HOUSING <https://denix.osd.mil/army-pre1919-pchh/>. The public webpage for the Army Pre-1919 Historic Housing Program Comment.
- PROGRAM COMMENT FOR ARMY INTER-WAR ERA HISTORIC HOUSING www.denix.osd.mil/army-pchh/ The public webpage for the Army Inter-War Era Historic Housing Program Comment.
- PROGRAM COMMENT FOR ARMY VIETNAM WAR ERA HISTORIC HOUSING
<https://www.denix.osd.mil/army-vwehh-pc/> The public webpage for the Army Vietnam War Era Historic Housing Program Comment.
- X (aka TWITTER): <https://twitter.com/DENIXnews> The Army secretariat releases monthly Army historic preservation-related Tweets.