



CONSULTATION BRIEFING #4: PROGRAM COMMENT FOR ARMY WARFIGHTING READINESS ACTIVITIES AND ASSOCIATED BUILDINGS, STRUCTURES, AND LANDSCAPES

POCs: David Guldenzopf, Ph.D., Army Federal Preservation Officer, david.b.guldenzopf.civ@army.mil
and Mary Schmidt, Army Deputy Federal Preservation Officer, mary.e.schmidt37.civ@army.mil



UNCLASSIFIED

June 2025

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. 4 – Stakeholder Review

- I. Introduction
- II. Intent
- III. Stakeholder Review
- IV. Federally-Recognized Tribes and Native Hawaiian Organizations
- V. National Security Consideration

* 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
 - Six Army 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.

Public/Stakeholder Review

- Department of Defense NEPA procedures are at <https://www.denix.osd.mil/nepa/>.
- Review of individual actions covered under the Program Comment will occur through the public review process for National Environmental Policy Act (NEPA) documents. NEPA documents are Environmental Impact Statements (EIS) for actions with significant potential impacts, and Environmental Assessments (EA) for actions with less significant or uncertain impacts.
- Public review is a required part of the process for preparation NEPA documents. EIS development period is limited by NEPA to two years. EA development by NEPA is limited to one year. Each NEPA document has distinct public review periods.
- SHPOs, Indian Tribes, NHOs, and others are under no obligation to review and comment on Army NEPA documents. Review of NEPA documents is discretionary.
- A NEPA Categorical Exclusion can not be used when there is an adverse effect to a historic property unless the adverse effect has been addressed through NHPA. The same principle applies to impacts to other resources covered by the Endangered Species Act, Clean Water Act, and Costal Zone Management Act, among others.
- The substantive NHPA requirements of inventory, evaluation, and mitigation of adverse effects will occur for each undertaking, regardless of whether an EIS, EA, or Categorical Exclusion is used for NEPA purposes.

Consultation with Federally-recognized Tribes and Native Hawaiian Organizations

- The Program Comment does not affect the Trust relationship that exists between the Army and federally recognized Indian Tribes. The Program Comment does not affect Army responsibilities under Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, or Executive Order 13007.
- The Army will continue Trust relationships with Indian Tribes. Army installations will continue government-to-government relations in recognition of Tribal sovereignty. Army installations in Hawaii will continue ongoing respectful consultative relationships with NHOs. Army installations will take into consideration the significance that federally recognized Indian tribes and NHOs ascribe to historic properties of traditional, religious, and cultural importance.
- Government-to-government consultations with federally recognized Indian Tribes and consultations with NHOs on individual actions will occur during EIS and EA public review periods, if not earlier.
- The Army strives to avoid adverse effects to known historic properties. Therefore, for the purposes of avoidance of adverse effects, Indian Tribes and NHOs are encouraged to proactively identify the locations of historic properties, including those historic properties of traditional, religious, and cultural importance, during their consultations with Army installation representatives.

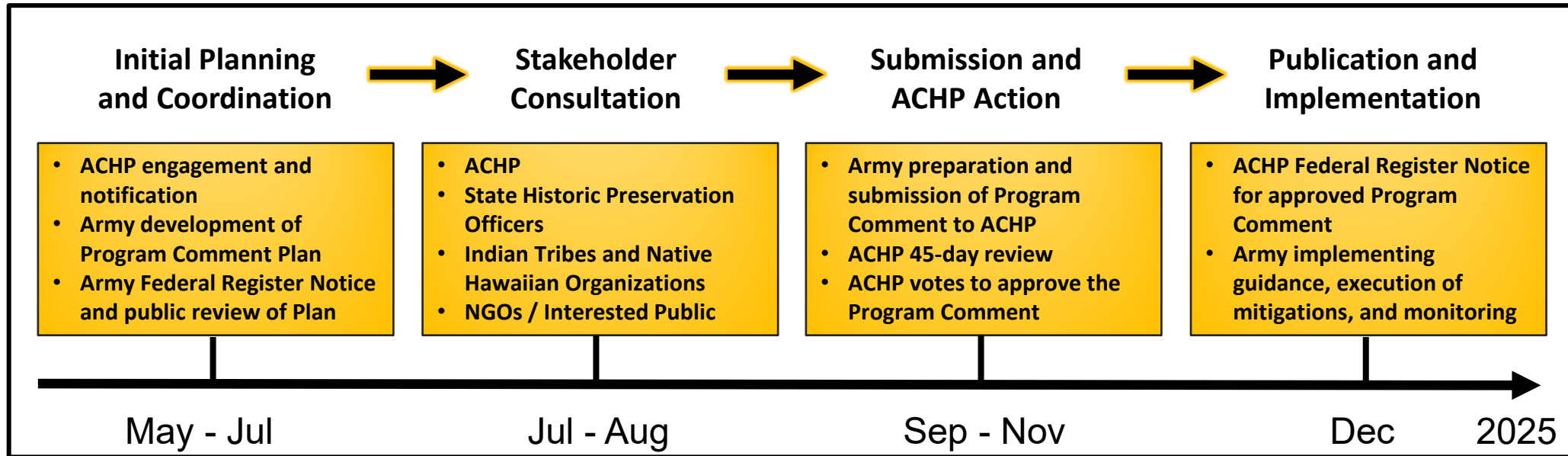
National Security Consideration

- Recognizing that national security and military readiness may, in exceptional cases, necessitate deviations from standard Historic Property Management procedures, the Army Federal Preservation Officer (FPO) is authorized to intervene and conclude actions that significantly impede military readiness, impact property uses for military readiness purposes, or otherwise compromise national security. In such cases, compensatory mitigation measures will be implemented where feasible.
- All actions taken by the FPO under this provision will be reported annually to the ACHP.

Upcoming Consultation Schedule

- **Consultation Briefing #5:** Program Comment 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.