



CONSULTATION BRIEFING #5: 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. 5 – Program Comment Administration

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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.

Annual Report and Annual Meeting

- On or before March 31st and for the first three years of implementation, the Army will provide an annual report to the ACHP for the preceding year. After the first three years, reporting for the duration of the Program Comment will occur once every three years through the Army's submission to the ACHP Section 3 Report to the President under E.O. 13287, Preserve America.
- The annual report will identify issues with implementation, how those were addressed, and how they will be avoided moving forward. The report will also include an assessment of the overall effectiveness of the Program Comment.
- After submission of the annual report and upon the ACHP's request, the Army will schedule a meeting with the ACHP and any other ACHP-identified invitees to discuss the program comment. Annual meetings will occur for the first three years of implementation.
- The meeting will provide a platform for attendees to provide their views on the overall effectiveness of the program comment in meeting its intent and purpose.

Applicability

- The proposed Program Comment applies to all Army warfighting readiness activities including military training, testing and equipping, industrial activities, and all buildings, structures, and landscapes associated with those activities.
- Management actions occurring on associated buildings, structures, and landscapes include maintenance, repair, rehabilitation, renovation, additions, new construction, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, lease, transfer, and conveyance.
- The Program Comment applies to the Active Army, Army Reserve, and federally-supported readiness activities of the Army National Guard (including federally-supported activities on state lands and properties).
- The Program Comment is not applicable to historic properties that have been previously determined to be not eligible for inclusion in the National Register of Historic Places (NRHP) in accordance with 36 CFR 800.4(c)(2), applicable NHPA agreement documents, or by a Determination of Eligibility (DOE) pursuant to 36 CFR 63.
- If at a future date, properties previously determined not eligible for inclusion in the NRHP are reassessed and subsequently determined to be eligible for inclusion in the NRHP, NHPA Section 106 compliance for those properties shall occur by means of this program comment.

Execution and Effect

- The Army will implement military training, testing, and industrial activities and management actions on associated buildings, structures, and landscapes in accordance with the Program Comment in lieu of 36 CFR 800.3 – 800.7, Army PAs, MOAs, and Army Alternate Procedures.
- The Program Comment replaces the review requirements in existing agreements with the requirements of the program comment for the undertaking and properties covered by this Program Comment.
- The Program Comment is a standalone document for NHPA compliance approved by the ACHP, and PAs and MOAs shall not be developed or amended to “implement” the program comments. The terms of the Program Comment are not subject to any change or further consultation in the context of PAs, MOAs, other program comments or NHPA-related actions. Changes may only be made following the amendment procedures of this Program Comment.
- Under the Program Comment, the Army meets its responsibilities for compliance under NHPA Section 106 for Army warfighting readiness activities and associated building, structures, and landscapes.

Duration

- The Program Comment will remain in effect until such time as the Army determines that this Program Comment is no longer needed and notifies the ACHP in writing or the ACHP withdraws the Program Comment in accordance with 36 CFR 800.14(e)(6) and this Program Comment.

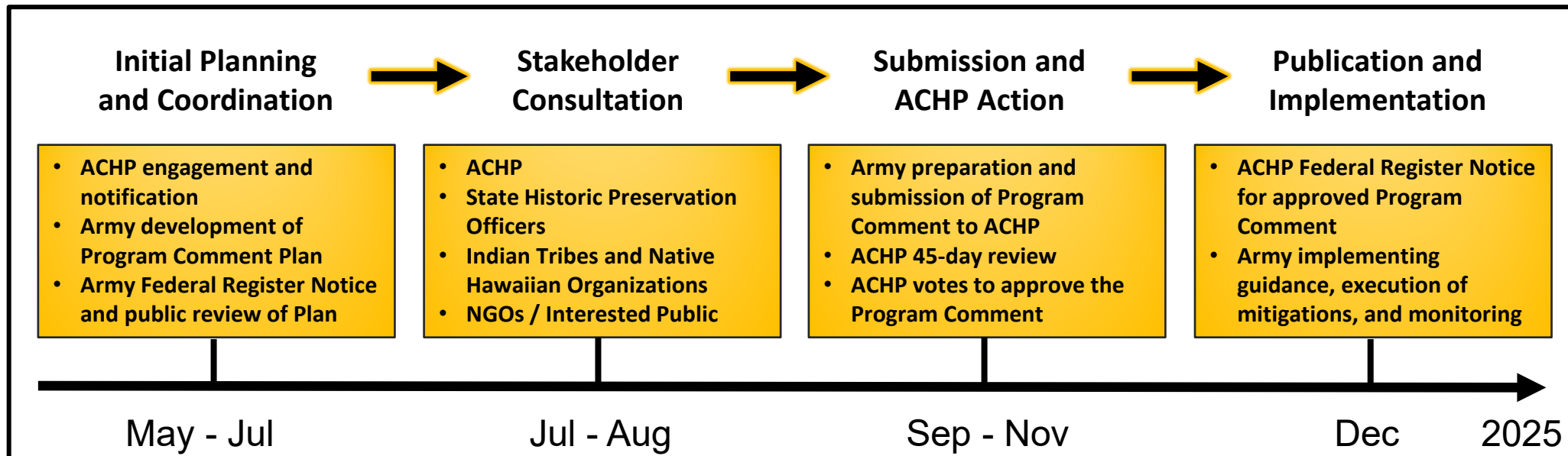
Amendments and Withdrawal

- The ACHP may formally amend this program comment after consulting with the Army, and other parties as it deems appropriate, as follows:
 1. The Chairman of the ACHP may amend this program comment to extend its applicability to the other military departments of the Department of Defense. The ACHP will notify the Army and will publish notice in the Federal Register regarding such amendment within 30 days after the Chairman's issuance of the amendment.
 2. The Executive Director of the ACHP, after notice to the ACHP membership and with the agreement of the Army, may amend this program comment to adjust grammatical and typographical errors. The ACHP will publish notice in the Federal Register regarding such amendment within 30 days of issuance.
 3. Other amendments to this program comment are subject to agreement by the Army. The ACHP will publish notice in the Federal Register regarding such amendments within 30 days of issuance.
- If the ACHP Chairman determines that undertakings are not being carried out in a manner consistent with this program comment, the ACHP Chairman may propose withdrawal of the program comment after consultation with the Army. Withdrawal of this program comment requires a majority vote of the full ACHP membership.

Upcoming Consultation Schedule

- **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.