



CONSULTATION BRIEFING #6: 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. 6 Agenda:

- I. Introduction
- II. Overview
- III. Program Comment Summary
- IV. Key Features and Benefits
- V. Q&A
- VI. Backup Information

* 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

Overview

- This proposed Program Comment is designed to address and accelerate the Army's (Army) compliance with Section 106 of the NHPA and its implementing regulation, 36 CFR § 800, for Army warfighting readiness activities.
- By implementing this Program Comment, the Army will be able to effectively balance and execute its continuous transformation and rapid modernization to a leaner, more lethal force, and crucial warfighting readiness mission with its historic preservation responsibilities by leveraging in-house expertise.
- This streamlined approach will enable more agile responses to the Army's operational needs and reduce administrative burdens on the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Offices (SHPOs), and Army installations.
- The approach will maintain the Army's government-to-government relationships with Federally recognized Tribes and uphold the special relationship with Native Hawaiian Organizations (NHOs), while ensuring the Army's continued responsible stewardship of historic properties.

Program Comment Summary

- Scope of the Program Comment: Army warfighting readiness activities (military training, testing, and industrial activities) and the buildings, structures, and landscapes associated with those activities. Covers buildings and structures of all ages associated with readiness. Excludes historic housing due to coverage under other Program Comments.
- Addresses Emerging Process and Capabilities Issues: The rapid modernization of a huge and aging Army infrastructure and increasing operational demands will require timely implementation and will drive a significant increase in the number of Army actions subject to Section 106 review. This increase in undertakings and need for timely implementation will further strain the capacities of SHPOs, ACHP, and Army installations. Consequences of this situation include delays in actions supporting warfighting readiness, increased costs due to delays and application of overly restrictive preservation standards, and a heightened risk of compliance challenges.
- Builds on Past Successes: The Army proposes a Program Comment that establishes a comprehensive approach to managing historic properties associated with warfighting readiness activities. This Program Comment builds on the successful ACHP-approved Program Comments for historic Army housing and directly addresses the emerging process and capabilities issues.

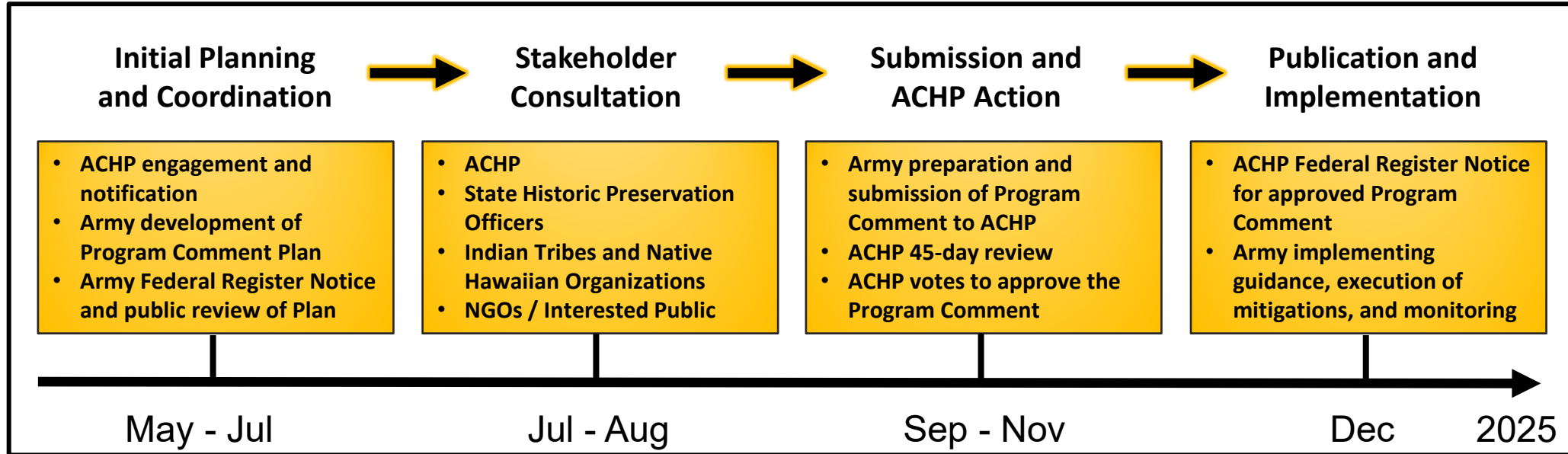
Key Features & Benefits

- Efficiency: Army will meet its NHPA requirements and readiness mission more efficiently and effectively.
- Comprehensive Management: Continues ongoing implementation of Army procedures for inventory, evaluation, determination of effect, mitigation, and monitoring of historic properties within a military landscape context.
- Design Guidelines and Procedures: Provides specific procedures and design guidelines for managing pre-1941 buildings, structures, and landscapes based on the *Secretary of the Interior's Standards for Rehabilitation*.
- Flexibility: Allows installations to continue using applicable categorical exclusions or exceptions found in existing Army installation Memoranda of Agreement (MOAs), Programmatic Agreements (PAs), and Army Alternate Procedures (AAPs).
- Individual Project Reviews: Continues review of individual projects by SHPOs, Indian Tribes, Native Hawaiian Organizations, interested parties, and members of the public through the National Environmental Policy Act (NEPA) review process.
- Government-to-Government Relationship with Indian Tribes and NHOs: Maintains and continues ongoing installation government-to-government relationships with Federally recognized Indian Tribes and maintains the ongoing consultative relationships between Army installations in Hawaii and Native Hawaiian Organizations IAW DoDI 4710.03.
- National Historic Landmarks (NHLs): Prioritizes avoiding adverse effects to NHLs to the maximum extent possible, considering the exigencies of the military readiness mission, and adhering to the *Secretary of the Interior's Standards and Guidelines for Rehabilitation*.

Key Features & Benefits (cont.)

- Army Historic Properties Review Board (HPRB): Establishes an Army HPRB comprised of subject matter experts to address and resolve issues regarding implementation of the Program Comment.
- Standardized Mitigation: Outlines standard mitigation strategies for adverse effects to historic properties and utilizes best practices in terms of application of the *Secretary of Interior's Standard for Rehabilitation* on the historic built environment.
- National Security Considerations: Allows for the Army Federal Preservation Officer to intervene in installation historic property management activities when there are significant national security impacts.
- Reporting & Review: Requires annual reports to the ACHP and annual stakeholder meetings to discuss implementation effectiveness.
- Implementation: The program comment will operate in lieu of the terms of existing Army PAs, MOAs and AAPs for the undertakings and properties covered by this program comment.
- Duration & Amendment: This program comment will remain in effect until the Army determines it is no longer needed or the ACHP withdraws it. Allows for amendment for specific purposes.

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.

Q&A and Discussion