

Travis Voyles
Vice Chairman

Reid J. Nelson
Executive Director



June 18, 2025

David Guldenzopf, PhD
Director for Environmental Quality
Army Federal Preservation Officer
Office of the Assistant Secretary of
the Army for Installations, Energy and Environment
110 Army Pentagon
Room 3D453
Washington, DC 20310-1001

Ref: Program Comment for Army Warfighting Readiness
Nationwide
ACHP Project Number: 023041

Dear Dr. Guldenzopf:

Thank you for providing the Army's notice of intent to develop and seek adoption of a Program Comment for Warfighting Readiness (Program Comment) in accordance with 36 CFR § 800.14(e). The ACHP recognizes that the Army has successfully developed and implemented several program comments that have provided efficiencies in their Section 106 process. We continue to support the Army in its efforts to seek programmatic solutions for the management of historic properties in its ownership, while also supporting warfighting readiness.

In order to promote the broadest efficiencies and most comprehensive solutions, we encourage the Army to coordinate with the Department of Defense (DoD) in considering whether the proposed PC would have greater utility if it were expanded to include all Military Departments. Such a strategy would allow for greater consistency across the DoD as well as those constituents who consult with and help the Military Departments consider the effects of these undertakings on historic properties.

The ACHP staff stand ready to consult with the Army, possibly representatives of other Military Departments, and key stakeholders on the development of the proposed PC. We appreciate the inclusion of a proposed timeline for action and the broad overview of the proposed PC in the notice of intent, and anticipate additional detail regarding the range of undertakings and affected historic properties. Should you have questions or require additional information, please contact Christopher Koepfel at ckoepfel@achp.gov or 202-517-0222.

Sincerely,

Reid Nelson
Executive Director