



*BEFORE THERE WAS A NATION,  
THERE WAS THE ARMY*

## ARMY INFORMATION PAPER

**Subject:** Program Comment for Army Warfighting Readiness

**Purpose:** To provide an overview of the Department of the Army's (Army) proposed Program Comment for Warfighting Readiness and Associated Infrastructure, highlighting its approach to balancing National Historic Preservation Act (NHPA) compliance with national defense imperatives.

**Key Points:** The Program Comment modernizes Army NHPA compliance, replacing an outdated and fragmented compliance system with a standardized, scalable, significance-based framework.

### 1. Balancing Preservation and National Defense.

- The Army manages one of the largest real property portfolios among federal agencies, encompassing 135 individual Army installations, 14 million acres of land, 84,000 known archeological sites, and over 390,000 buildings exceeding one billion square feet designed, built, and managed by Army.
- The current system for compliance with Section 106 of the NHPA has proven highly inefficient for Army modernization and readiness objectives.
- The Army's new "Continuous Transformation Initiative" requires a streamlined approach to reconcile preservation with operational demands.

### 2. Section 106 Compliance Challenges.

- The standard Section 106 project-by-project review is unsustainable for the Army's vast inventory, projected to grow to over 500,000 properties subject to Section 106 review in the coming years as buildings age and additional archeological sites are located.
- A fragmented system of 115 local installation-level Section 106 compliance agreements have led to inconsistent application of preservation standards and processes, resulting in widespread inefficiencies.
- Highly restrictive museum-level preservation standards have been misapplied, inflating costs, diverting resources, and contributing to a backlog of deferred maintenance for Army buildings.

### 3. Program Comment Solution.

- The Army proposes this Program Comment under 36 CFR § 800.14(e) to standardize and accelerate Section 106 compliance for warfighting readiness activities and the Continuous Transformation Initiative.

- This unified framework replaces the fragmented system of agreements and introduces the "military landscape" as the nationwide analytical context.

**4. Tiered Management.** The Program Comment operationalizes this approach through a tiered system that tailors management to a property's significance:

- **Tier 1. National Historic Landmarks (NHLs):** The Army's 20 NHLs are subject to the highest standard of care under the program comment, with Army secretariat-level project specific consultation for all adverse effects to NHLs.
- **Tier 2. Properties of Traditional Religious and Cultural Importance (PTRCI):** Project specific consultations are conducted by installations with Federally recognized Tribes and Native Hawaiian Organizations (NHOs) for all actions with adverse effects to these properties.
- **Tier 3. Pre-1941 Built Infrastructure/Archeological Sites/Other Properties (Non-PTRCI):** Focused management efforts by installations occur for pre-1941 built infrastructure (non-NHL), archeological sites and other properties (non-PTRCI) following program comment procedures and guidelines.
- **Tier 4. Non-NHL WWII and Cold War Era Infrastructure (1941-1989):** Section 106 requirements for non-NHL properties from this period are concluded under the Program Comment. Army's preservation of WWII and Cold War Era NHLs and the extensive documentation of numerous properties from this period mitigates effects on these properties.

**5. Stewardship and Consultation.**

- **Tribal Government-to-Government Consultation and Native Hawaiian Consultation:** Ensures Indigenous Knowledge informs project specific decision-making for properties of traditional religious and cultural importance.
- **National Mitigation Areas:** Long-term stewardship beyond the requirements of the NHPA occurs at Carlisle Federal Indian Boarding School National Monument (PA), Castner Range National Monument (TX), and Kūkaniloko in-perpetuity conservation easement (HI).
- **Transparency and Accountability:** Annual reports summarizing all compliance efforts will be published by installations on public web sites for the duration of the program comment. The Army Federal Preservation Officer hosts annual stakeholder reviews for first three years of implementation.

**6. Conclusion.**

- The proposed program comment better aligns preservation with national defense imperatives.
- Army program comment information: <https://www.denix.osd.mil/army-pcwr/>.
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