



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

ARMY INFORMATION PAPER

Subject: Program Comment for Army Warfighting Readiness and Associated Infrastructure.

Purpose: Provide an overview of the Department of the Army's Program Comment for Army Warfighting Readiness and Associated Infrastructure (Program Comment).

Key Points:

- The Program Comment modernizes Army National Historic Preservation Act Section 106 compliance, replacing an outdated and fragmented compliance system with a strategic framework that better supports the Army's ability to rapidly transform and modernize its forces and military infrastructure.
- The Advisory Council on Historic Preservation approved the Army's Program Comment on 3 April 2026 and subsequently published a Notice of Issuance in the Federal Register (91 FR 24249).

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, 88,000 archeological sites, and over 390,000 buildings exceeding one billion square feet designed, built, and managed by the Army.
- The current system for compliance with Section 106 of the NHPA has proven inefficient for Army readiness and modernization objectives. The Army's Continuous Transformation Initiative requires a Program Comment approach that addresses Section 106 compliance more efficiently and effectively.

2. Section 106 Compliance Challenges:

- Standard Section 106 project-by-project, step-by-step review is not sustainable for the Army's vast portfolio, projected to grow to over 500,000 properties subject to Section 106 review in the coming years.
- A fragmented system of 115 local installation-level Section 106 compliance agreements has led to delays and the inconsistent application of preservation standards and processes, resulting in widespread inefficiencies.
- Highly restrictive and costly museum-level preservation standards have been misapplied to Army military infrastructure, inflating costs, diverting resources, and contributing to a backlog of deferred maintenance.

3. Program Comment Solution:

- The Program Comment accelerates and improves Section 106 compliance for Army warfighting readiness by reducing bureaucracy, optimizing resources, and by

replacing subjective assessments with standardized Army-wide procedures and guidelines to ensure more predictable outcomes.

- This Program Comment replaces the Army's complex and inconsistent regulatory environment of 115 installation-level agreements with a more strategic framework.

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 20 Army NHLs receive a higher standard of care under the Program Comment, with Army Secretariat-level consultation with ACHP and NPS for actions that may affect NHLs.
- **Tier 2 - Properties of Traditional Religious and Cultural Importance (PTRCI):** PTRCI receive a higher standard of care with project-by-project consultation conducted by installations with Federally recognized Tribes and Native Hawaiian Organizations for actions that may affect PTRCI.
- **Tier 3 - Pre-1941 Built Infrastructure / Archeological Sites (non-PTRCI):** Program Comment procedures and guidelines are implemented internally by installations for actions affecting non-NHL pre-1941 infrastructure and for non-PTRCI archeological sites.
- **Tier 4 - WWII and Cold War Era Infrastructure (1941-1989) (Non-NHL):** All Section 106 requirements for non-NHL infrastructure from this period are concluded under the Program Comment. Army's ongoing preservation of WWII and Cold War Era NHLs and the extensive documentation of period properties mitigates effects of Army undertakings on these non-NHL properties.

5. Consultation and Stewardship:

- **Tribal Government-to-Government Consultation and Native Hawaiian Consultation:** Ongoing installation consultation under the Program Comment for PTRCI ensures Indigenous Knowledge informs Army decision making.
- **National Mitigation Areas:** These areas specified in the Program Comment provide for Army stewardship of historic properties beyond the requirements of Section 106 and include officially designated **National Monuments** located on Army installations and permanently protected PTRCI.
- **Transparency and Accountability:** Annual reports summarizing compliance efforts under the Program Comment are published for the duration of the program comment. The Army Federal Preservation Officer conducts annual reviews with ACHP and others for duration of the Program Comment.

6. Additional Information:

- Army Program Comment information: <https://www.denix.osd.mil/army-pcwr/>.
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