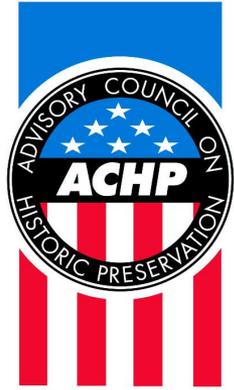


# ***Conducting Section 106 Reviews under BRAC***

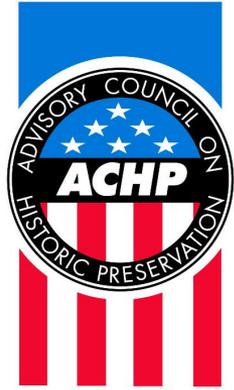
***Charlene Vaughn  
Advisory Council on  
Historic Preservation***



## ***ACHP History with the BRAC Program***

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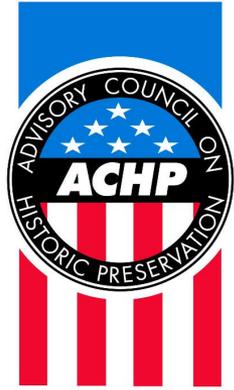
- ***MOAs and PAs for closed facilities***
  - ***Focused on buildings***
  - ***Little attention to archeology***
- ***Stakeholder participation limited to local communities (LRAs)***
- ***Mitigation plans resulted in retention and reuse***



# ***Major Lessons Learned from Previous BRAC Rounds***

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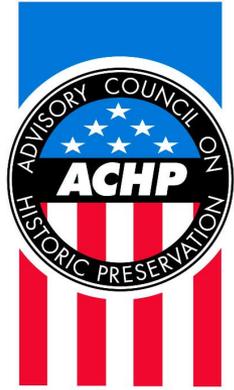
- ***Consult early in the process***
- ***Improve NEPA coordination***
- ***Broaden stakeholder participation***
- ***Recognize complexities of covenants***
- ***Consider future remediation***
- ***Clarify roles and responsibilities for post-agreement reviews***



## ***New Approaches to 106 Review for BRAC 2005***

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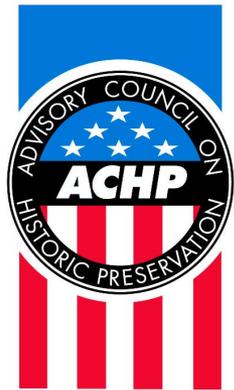
- ***Streamline reviews through program alternatives [36 CFR § 800.14(a) – (e)]***
- ***Prepare baseline information early***
- ***Identify standard mitigation measures for various types of conveyances***
- ***Develop ACHP policy regarding remediation impacts on redevelopment options***
- ***Develop tribal consultation protocols***



# ***Impact to Historic Properties: Closure vs. Realignment***

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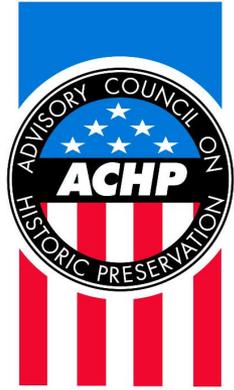
- ***Closure requires consideration of discrete, more immediate preservation issues***
- ***Realignment should focus on***
  - ***Section 106 and Section 110 of NHPA***
  - ***Long-term management***
  - ***Indirect effects on historic properties***



## ***Role of Consulting Parties***

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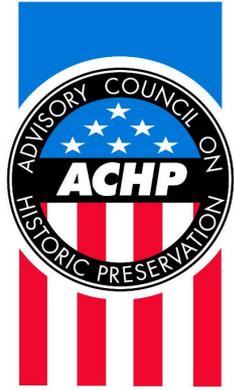
- ***Involvement of State and local preservationists is important***
- ***Role of developers should be addressed***
- ***Consider other parties, besides SHPOs to become covenant holders***
- ***Tribal consultation must be on a government-to government basis***



# ***DoD & ACHP Collaboration: Improvements to Section 106 Reviews***

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- ***ACHP staff participates in DoD BRAC work groups***
- ***ACHP membership involved in program alternatives***
- ***ACHP established DoD BRAC task force to assist DoD***
- ***ACHP and DoD must consider new strategies for streamlining BRAC review process***



# **Contact Information**

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