



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

August 20, 2025

Dr. David Guldenzopf
Office of the Assistant Secretary of the Army
for Installations, Energy and Environment
ATTN: DASA-ESOH
110 Army Pentagon, Room 3E464
Washington, DC 20310

Re: Program Comment Plan for Army Warfighting Readiness and Associated Buildings,
Structures, and Landscapes (Army Program Comment Plan)
Log No.: 082709-23-DOA

Dear Dr. David Guldenzopf:

We have reviewed the Program Comment Plan for Army Warfighting Readiness and Associated Buildings, Structures, and Landscapes. We are supportive of efforts to increase readiness, infrastructure, and modernization of Army installations. We applaud the effort to improve Army internal procedures to increase consistency and reduce risk. We also recognize that the Section 106 process is, by design, consultative.

Please consider these specific comments:

1. Insulting SHPOs in the document is highly unnecessary and counterproductive to maintaining good relationships between federal and state governments. The Army can make their case without diminishing the work of their counterparts in state government. We do not view our relationship with the Army as adversarial, and we do not operate in a vacuum. The SHPO plays a key role in representing the citizens of the state in which the Army installation is located. We are also a key locus of technical and historic knowledge of the local community that affords the installation insights they would not otherwise have. The SHPO-Army installation relationship should be strengthened not weakened.
2. We object to the insinuation that SHPOs take too long to respond. The WASHPO generally responds to undertakings within one business week. If a project needs a more immediate response, we have always prioritized the military needs as requested. We have a decades long track record of timely responses to both installation and the public.
3. Due to changes in regulations and guidance that stem from the United States Supreme Court Seven County Infrastructure Coalition decision, we oppose replacing the Section 106 review process required in 36 CFR 800.3 - 800.7 with the public review procedures in the National Environmental Policy Act. We contend that the regulations in 36 CFR 800.3 - 800.7 should remain a stand-alone process.



4. We do not have any data demonstrating that the Installation level agreements have been ineffective. Conversely, they are overall beneficial for the state-federal relationship and targeted to the regional resource. We have a good relationship with Army command at JBLM. We contend that reforming the concept of the installation cultural resource management plan (CRMP) is a more effective compliance tool. This is particularly important to ensure that such CRMPs reflect current technologies and best practices that are operative in the larger cultural resources and environmental community.
5. We see our role as balancing war and military readiness with the preservation of our nation's tangible and incredibly significant military history. Since the *United States v. Gettysburg Elec. Ry. Co.* | 160 U.S. 668 case in 1896, Americans have viewed the Army as a key leader in the protection and preservation of our shared history. Our work in historic preservation respects and honors our military past *and* present. Preserving significant buildings is a means of acknowledging the hard-fought battles of our veterans and should be viewed as an opportunity rather than a hindrance.
6. Existing Programmatic and Memorandum of Agreements are contracts and cannot be unilaterally terminated. If the Army is replacing all agreements with this program comment, there should be formal notice of the termination of agreements.
7. A representative of NCSHPO, NATHPO, and one independent SOI qualified expert, should be added to the Army Historic Properties Review Board.
8. SHPOs should be able to review treatment plans within a reasonable time. We are in position to assist as opposed to hinder.
9. 36 CFR Part 800 gives SHPOs and THPOs the right to review methodology before commencing with data recovery. This consultation should be retained. In addition, all inventory site data and professional cultural resource reports should be proactively shared with the respective SHPO and THPOs.
10. Compensatory mitigation is an excellent concept. The use of compensatory mitigation for loss or damage to buildings or TCPs is an important consideration. Damage to a TCP could correspond to the purchase of another TCP for conservation purposes, for example. If one historic building must be damaged or lost, another could be rehabilitated or preserved.
11. 4.2.410 should reference the requirement under NHPA to consult with Native Hawaiians and Indian Tribes on properties of cultural and religious significance. This is a statutory requirement that cannot be altered without a Congressional amendment.
12. SHPOs and THPOs should receive that annual report, not just the ACHP. There should be a local meeting by the Army installation with the SHPO and the



THPOs. This assists with relationship building as well as developing creative solutions to difficult problems.

Thank you for the opportunity to comment.

Sincerely,



[Allyson Brooks \(Aug 20, 2025 15:46:21 PDT\)](#)

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Dept. of Archaeology and Historic Preservation

