Program Comments Description

A Program Comment fulfills National Historic Preservation Act (NHPA) compliance requirements for an entire category of undertakings – such as renovation, demolition, or transfer, sale or lease from Federal ownership for a particular building type. The Army and DoD recently received three Program Comments for Cold War era Unaccompanied Personnel Housing, World War II and Cold War Ammunition Storage Facilities, and World War II and Cold War Army Ammunition Production Facilities and Plants, covering 35,000 Army buildings.

The text of the Program Comments and implementation guidance can be found the AKO Cultural Resources Site at https://www.us.army.mil/suite/page/412399.

Program Comments Scope

The Program Comments apply to Army-owned ammunition production facilities (Army Real Property category group 226XX) built between 1939 and 1974, all properties built between 1939 and 1974 at Army Ammunition Plants, all Army-owned buildings and structures designed and built as ammunition storage facilities (Army Real Property category group 42XXX) within the years 1939-1974, and all Army-owned buildings and structures that were designed and built as Unaccompanied Personnel Housing (UPH) in the years 1946-1974, at installations in the United States and its territories. The UPH category includes all properties in the Army real property category group 72XXX, with the exception of properties categorized as Army Lodging (72010), unless they were designed and built as UPH in the covered time period.

Lists of these properties by state are available on AKO at https://www.us.army.mil/suite/folder/7439908.

Installations Actions Covered under the Program Comments

Actions covered by the Comments include ongoing operations, maintenance and repair; rehabilitation; renovation; mothballing; cessation of maintenance, new construction, demolition; deconstruction and salvage; remediation activities; and transfer, sale, lease, and closure of these categories of properties.
Program Comments Applicability

Installations may undertake any action to the covered properties without the need for further NHPA consultation or mitigation. Effects to historic properties other than UPH, or ammunition storage and production facilities and Plants are not covered, and must still undergo consultation on those effects. The Program Comments do not apply to properties in historic districts if the undertaking has the potential to adversely affect the historic district. The Comments do apply to districts composed solely of covered properties.

Effect of the Program Comments on Existing NHPA Agreement Documents

Installations with existing agreement documents that include some of the properties covered by the Program Comments have three options: 1) continue to follow the stipulations of the existing document until its expiration; 2) amend the agreement to incorporate the Program Comments; or 3) terminate the existing agreement and reinitiate consultation on a new agreement, if needed.

Program Comment Mitigation Actions Implemented by USAEC

The Program Comments require the Army to complete historic contexts on ammunition storage and ammunition production, and to create a publicly-available version of the existing UPH context. The Comments also require the Army to complete documentation of nine installations with World War II and Cold War era ammunition storage facilities, and two installations with Cold War era ammunition production facilities. Finally, the Army will create a display that traces the life of an ammunition round from production to storage. All treatment measures have been centrally funded by HQDA, and the project is being managed by the U.S. Army Environmental Command.

Net Effect

Due to the Army’s massive World War II and Cold War era real property inventory, the Army is facing a significant challenge in historic preservation compliance, as close to 100,000 buildings will be subject to NHPA over the next twenty years. Combined with the 2002 Program Comment for Capehart-Wherry family housing, these Program Comments address current NHPA compliance responsibilities while addressing future growth of buildings subject to NHPA. The estimated cost avoidance for the three recent program comments is $25 million.

For more information contact the Preservation Branch, Environmental Quality Division, U.S. Army Environmental Command, at 410-436-1203