

"Active support and involvement in the process by both Army Headquarters and the [ACHP]... has ensured that these procedures meet both Army and [ACHP] policy. We believe that the Army Alternate Procedures will now allow us to better manage our historic resources, streamline our processes to internal Army missions and reduce the adminstrative costs associated with compliance."

> -MAJOR GENERAL ROBERT L. VAN ANTWERP Then-Assistant Chief of Staff for Installation Management, 2001

Photos: Above, gate to a research and development area at Picatinny Arsenal, NJ; Right, the former Showbowl used by the U.S. Calvary at Fort Benning, GA; former headquarters of the U.S. Army Infantry School at Fort Benning, GA



Adopting Innovative Process Improves Army Cultural Resource Management

Nationwide



THE STORY

As stewards of the nation's largest inventory of federally owned or managed historic properties, the Department of Defense strives to maintain, promote, and interpret the resources it manages, both to support the mission and to preserve military heritage for future generations. Among all the services, the Department of the Army (Army) holds the greatest amount of real property (land and the built environment) identified as historic properties. It cares for more than 100,000 cultural resources on some 15 million acres of land, including 11,895 historic buildings listed or eligible for listing in the National Register of Historic Places, 10,246 archaeological sites, and 19 National Historic Landmarks.

THE PROJECT

The Advisory Council on Historic Preservation (ACHP) encourages federal agencies to explore program alternatives in meeting their Section 106 responsibilities. One method is the ability to develop procedures to implement Section 106 and substitute them for all or part of the process specified in the government-wide Section 106 regulations. In the early 2000s, the Army elected to develop such procedures.

THE 106 PROCESS

The Army, the federal agency carrying out this initiative, was responsible for conducting the Section 106 process under the National Historic Preservation Act. Section 106 requires that federal agencies identify historic properties and assess the effects of the projects they carry out, fund, or permit on those properties. Federal agencies also are required to consult with parties that have an interest in the fate of the property when adverse effects are likely to ensue. When developing alternative procedures, federal agencies consult with the ACHP and stakeholders, with the ACHP giving final approval.

In order to adopt the Army Alternate Procedures (AAP), an installation's garrison commander and cultural resources management team work closely with the ACHP and the appropriate State Historic Preservation Officer (SHPO), federally recognized Indian



Photos: Left, a soldier is dropped from the iconic 250 foot tower during Airborne School at Fort Benning, GA (photo by Ashley Cross/U.S.Army); Right, former research and development building at Picatinny Arsenal, NJ

tribes, and identified consulting parties on the development of a Historic Properties Component (HPC). The HPC is a five-year plan that provides for identification, evaluation, assessment of effects, treatment, and management of historic properties using a documented internal review process that does not always require external review by the SHPO and other consulting parties. The HPC supersedes the general Section 106 regulations, and the installation may begin operation under the HPC once it has been certified by the ACHP.

The Army worked with the staff and membership of the ACHP, the National Conference of State Historic Preservation Officers, and numerous other interested parties to develop its own Section 106 process. In 2002, the ACHP first approved the AAP as a tailored procedure that individual Army installations could elect to follow to satisfy the requirements of Section 106. The AAP allows individual installations to use standard operating procedures for Section 106 compliance over the five-year period without formal project-by-project review by the SHPO and other consulting parties on projects that do not have adverse effects. The current AAP was approved by the ACHP in 2004.

THE SUCCESS

Three installations are currently operating under the AAP with certified HPCs: Fort Benning, Georgia; Fort Hood, Texas; and Picatinny Arsenal, New Jersey. From 2011 to 2015, Fort Benning saw 5,000 projects reviewed under the AAP. However, by following the HPC, only 37 of those projects required review by the Georgia SHPO, saving Fort Benning nearly 300,000 days in cumulative review if it had followed the standard process. Due in part to its adoption of the AAP, its streamlining compliance efforts in cultural resources management, and improving its consultation on and management of its historic properties, Picatinny Arsenal was awarded the 2015 Secretary of Defense Environmental Award for Cultural Resources Management, Small Installation.

While the implementation of the AAP is still expanding, it has resulted in more efficient compliance where it has been used, making the management of historic properties proactive and not reactive. The ACHP continues to work with the Army to identify installations that would benefit from adopting the AAP in order to spread the preservation benefits and cost- and time-savings even more broadly.

ADVISORY COUNCIL ON HISTORIC PRESERVATION 401 F Street NW, Suite 308, Washington DC 20001 Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

Consulting Parties:

Department of the Army ACHP

- National Conference of State Historic Preservation Officers
- United States Army Garrison, Fort Benning, Georgia
- United States Army Garrison, Fort Hood, Texas
- United States Army Garrison, Picatinny Arsenal, New Jersey
- Georgia State Historic Preservation Officer
- New Jersey State Historic Preservation Officer
- Texas State Historic Preservation Officer

For more about Section 106 and the ACHP go to **www.achp.gov**



Preserving America's Heritage