



**ADVISORY COUNCIL ON HISTORIC
PRESERVATION
FEBRUARY MEETING**

FEBRUARY 12, 2026

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637

Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov



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FEBRUARY 12, 2026**

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**BUSINESS MEETING
ADVISORY COUNCIL ON HISTORIC PRESERVATION
AGENDA**

**February 12, 2026
9:00 a.m. – 12:00 p.m. ET
Arlo Hotel, Studios A and B
333 G Street NW, Washington, DC
Washington, DC**

Call to Order

- I. Vice Chairman's Report
 - A. Welcome and introductions
 - B. Key priorities
 - C. Council organization
- II. Executive Director's Report
 - A. Budget, staffing, and operations update
- III. ACHP Strategic Planning
 - A. Summary of Strategic Plan
 - B. Proposed vote on adoption of Strategic Plan (*action needed*)
- IV. Regulatory Updates
 - A. Section 106 regulation review
 - B. Reversion of the ACHP's NEPA and UDAG regulations
- V. Army Program Comment
 - A. Summary of program comment and final adjustments
 - B. Proposed vote on adoption of program comment (*action needed*)
- VI. Cultural Resources Data Platform Update
 - A. Background and goals
 - B. Next steps
- VII. New Business
- VIII. Adjourn



BUSINESS MEETING
ADVISORY COUNCIL ON HISTORIC PRESERVATION
ANNOTATED AGENDA
February 12, 2026
9:00 a.m. – 12:00 p.m. ET
Arlo Hotel, Studios A and B
333 G Street NW, Washington, DC
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Call to Order

- I. Vice Chairman's Report
 - A. Welcome and introductions. *Vice Chairman Voyles will welcome the Members to the February Business Meeting and ask Members to introduce themselves.*
 - B. Key priorities. *Vice Chairman Voyles will summarize his recent activities and identify key priorities for the ACHP.*
 - C. Council organization. *Vice Chairman Voyles will summarize his efforts to review current observer designations and seek input from the Members on subcommittees.*
- II. Executive Director's Report
 - A. Budget, staffing, and operations update. *Executive Director Reid Nelson will report on the status of FY 2026 funding, the FY 2027 budget, and ACHP organization and operations.*
- III. ACHP Strategic Planning
 - A. Summary of Strategic Plan. *Vice Chairman Voyles and Office of External Engagement Director Ashley Fry will summarize efforts to develop and seek input from Members on a new Strategic Plan. Director Fry will summarize the plan for the Members and address any final Member comments.*
 - B. Proposed vote on adoption of Strategic Plan (*action needed*). *The Members will be asked to vote on the adoption of the final Strategic Plan.*
- IV. Regulatory Updates
 - A. Section 106 regulation review. *Vice Chairman Voyles will share his views on the need to consider updates to the Section 106 regulations and lead a discussion with the Members on the process and timeline for doing so.*
 - B. Recission of the ACHP's NEPA and UDAG regulations. *Vice Chairman Voyles and General Counsel Kelly Fanizzo will update the Members on the status of efforts to rescind these two regulations.*



V. Army Program Comment

- A. Summary of program comment and final adjustments. *Vice Chairman Voyles and Office of Federal Agency Programs Director Jaime Loichinger will update the Members on efforts to develop a Program Comment in response to a request from the Department of the Army and summarize any adjustments made to the Program Comment in subsequent consultation with the Army.*
- B. Proposed vote on adoption of program comment (*action needed*). *The Members will be asked to take action on the request to adopt the Program Comment.*

VI. Cultural Resources Data Platform Update

- A. Background and goals. *Vice Chairman Voyles, Executive Director Reid Nelson, and ACHP staff will summarize efforts to develop a cultural resource data platform. ACHP staff will also summarize the plan and timeline for developing the platform.*
- B. Next steps. *Vice Chairman Voyles will seek input on Member engagement to advance this important initiative.*

VII. New Business. *There is none at this time.*

VIII. Adjourn.



**ACHP STRATEGIC PLANNING
FY 2026 – FY 2030
Office of External Engagement**

Background. Each federal agency is responsible for developing a strategic plan every four years, to set long-term objectives an agency hopes to accomplish at the beginning of each new term of an Administration. Per guidance from the Office of Management and Budget (OMB), an agency’s strategic plan not only describes general and long-term goals the agency aims to achieve but it must also include what actions the agency will take to achieve those goals.

Status. Since the spring of 2025, Advisory Council on Historic Preservation (ACHP) staff has worked with Council Members and OMB to develop goals and objectives for the ACHP’s Strategic Plan, including mission and vision statements, to ensure the Strategic Plan reflects the priorities and goals of the Trump Administration, as well as the statutory requirements of the National Historic Preservation Act (NHPA).

In late spring 2025, ACHP staff solicited input from Members on a draft of Strategic Plan core components, including agency Strategic Goals for the ACHP’s major functions and operations. ACHP staff received comments from several Members recommending the Strategic Goals align with statutory language in the NHPA and language that would help strengthen federal historic preservation programs. This feedback was incorporated, and the Strategic Plan core components were submitted to OMB in August 2025. The ACHP did not receive substantive comments from OMB on the core components of the Strategic Plan.

In early fall 2025, ACHP staff developed and provided members with a full draft Strategic Plan. In addition to Strategic Goals, the draft included more detailed Strategic Objectives that cover the major functions and operations of the agency along with implementation strategies for each Strategic Objective. Again, ACHP staff evaluated and incorporated Member edits, focused on more specific historic preservation terminology, and strengthening language around the ACHP’s trust responsibility to Indian Tribes. ACHP staff then provided the full draft Strategic Plan to OMB on December 9, 2025. The ACHP received substantive edits from OMB for two Strategic Objectives related to collection of applicant data from federal agencies and regulatory review. ACHP staff worked with OMB to incorporate those edits.

ACHP staff will provide an overview of the Strategic Plan at the business meeting for the benefit of new members and detail any final comments or recommended adjustments from OMB. Members will have the opportunity to weigh in on any final adjustments necessary to finalize the plan for formal adoption. A copy of the final draft of the Strategic Plan as conveyed to OMB is in the Appendix.

Action needed. Members should be prepared to discuss the final draft of the Strategic Plan and to vote on whether it should be approved for final submission to OMB and public release.



SECTION 106 REGULATION REVIEW Office of General Counsel

Introduction. In accordance with the Trump Administration’s policy to review existing environmental review regulations, the Vice Chairman is directing the Members of the Advisory Council on Historic Preservation (ACHP) to carry out a review and consider potential revisions to the existing Section 106 regulations at 36 CFR Part 800. This effort was announced by the Vice Chairman in correspondence with Council Members on January 26, 2026.

The Members will be asked for their input on a strategy for further engagement with the Members and external stakeholders on this initiative; a process for moving potential revisions to the existing Section 106 regulations forward; and a proposed timeline for rulemaking action.

Goals. The Administration and Senate Energy and Natural Resource Committee members have provided input on challenges that stakeholders are encountering in the use of the current Section 106 regulations. The challenges they have identified include, but are not limited to, lengthy and protracted reviews; confusion on addressing indirect and cumulative effects; burdensome requirements for long, linear projects; difficulty reaching agreement on routine effects to historic properties; and the unnecessary delay to critical projects that serve the American people. It is also essential that the members themselves, using their own experiences, identify other areas for improvement.

The goal of this effort will be to consider how the Section 106 regulations might be modified, clarified, or streamlined to better accomplish the statutory objectives and requirements of the National Historic Preservation Act (NHPA). To inform this effort, Members should consider the following questions:

- Could the Section 106 regulations, or any portion thereof, be streamlined to more effectively achieve the statutory objectives of the NHPA? If so, what changes should be made?
- Is there any portions of the Section 106 regulations that are difficult to interpret or have become unnecessary, ineffective, or ill-advised? If so, please identifying them.
- Have the Section 106 regulations, or any portion thereof, become outdated? If so, how can they be modernized to better accomplish the statutory objectives of the NHPA?
- Can any new technologies be leveraged to modify or streamline the Section 106 regulations? If so, please identify them.
- What additional information should the ACHP collect regarding the Section 106 process? Should the collection of such data be directed in the regulations?
- Are the Section 106 regulations, or any portions thereof, inconsistent with any E.O.s or directives issued by the President? If so, what modifications would ensure consistency with the orders and applicable law?

Next Steps. The Vice Chairman intends to designate an ACHP workgroup to focus on the review of the Section 106 regulations and provide feedback to him and the broader membership as progress is made



and developments occur between regularly scheduled business meetings. Members will be asked to consider:

- The composition and operations of this workgroup
- How they would like to be kept informed on this effort
- A timeline for completion

Action needed. Members will be asked to provide input at the business meeting on the questions posed above. They will also be asked to send written expressions of interest in participating in a ACHP committee to review the Section 106 regulations to the Vice Chairman, with a copy to Reid Nelson and Kelly Fanizzo, by February 20, 2026. Additionally, Members should provide any written feedback on the points and questions raised above to the Vice Chairman, copy to Reid Nelson and Kelly Fanizzo, by February 27, 2026. This feedback will be provided to the ACHP workgroup for review and consideration. ACHP staff will assist in facilitating this discussion and providing information to the Members.

**PROPOSED RECISSION OF THE ACHP'S REGULATIONS IMPLEMENTING THE
NATIONAL ENVIRONMENTAL POLICY ACT AND THE URBAN DEVELOPMENT
ACTION GRANT PROGRAM
Office of General Counsel**

Background. Members of the Advisory Council on Historic Preservation (ACHP) voted via unassembled meeting, concluding on December 12, 2025, to move forward with the proposed rulemaking actions to rescind the below mentioned regulations. ACHP staff updated the Unified Regulatory Agenda entries for the Fall 2025 submission to reflect these steps and provided the Office of Information and Regulatory Affairs (OIRA) draft copies of the Federal Register notices for both proposed rulemaking actions on December 15, 2025.

Status. *Urban Development Acting Grant regulations.* In response to the President's direction and the general policy set forth in E.O. 14192, *Unleashing Prosperity through Deregulation*, ACHP staff identified 36 CFR Part 801, Historic Preservation Requirements of the Urban Development Action Grant Program (UDAG), as outdated and no longer needed. The ACHP's regulations at 36 CFR Part 801 provide the Section 106 review process for undertakings proposed to be funded by the Department

of Housing and Urban Development's (HUD) UDAG Program. The purpose of the UDAG Program is to provide urban development action grants to cities and urban counties that are experiencing severe economic distress to help stimulate economic development activity needed to aid in economic recovery.

The UDAG Program is no longer current. The last appropriation HUD received for the UDAG Program was for fiscal year 1988. HUD administratively closed out any remaining UDAG Program grants in 2021. HUD does not anticipate any projects funded by the UDAG Program to be proposed as



subject to the ACHP's Part 801 regulations. As such, ACHP proposed to rescind the regulations in full via a Notice of Proposed Rulemaking. The draft notice is currently with Office of Information and Regulatory Affairs (OIRA) for review.

NEPA regulations. In response to the President's direction in E.O. 14154, *Unleashing American Energy*, and the Council on Environmental Quality's (CEQ's) February 2025 guidance to federal agencies on revising existing agency National Environmental Policy Act (NEPA) procedures, ACHP staff reviewed the agency's existing NEPA regulations at 36 CFR Part 805 and recommended rescinding the regulations in full. Promulgated in 1980 to supplement the regulations established by CEQ, the ACHP's regulations at 36 CFR Part 805 set forth the procedures for the ACHP to comply with NEPA.

CEQ rescinded its NEPA regulations, effective April 11, 2025. The ACHP rarely proposes major federal actions that require review under NEPA and, therefore, rarely utilizes its regulations

implementing NEPA. The ACHP may determine at a later date that internal NEPA procedures would be useful for the rare occasion it proposes a major federal action and, if so, the ACHP may develop

such procedures. ACHP staff consulted with CEQ staff in late summer/early fall 2025 on the development of the proposed Federal Register notice. ACHP submitted the draft notice of an Interim Final Rule to OIRA for review.

Action needed. None.

**PROPOSED PROGRAM COMMENT FOR ARMY WARFIGHTING READINESS AND
ASSOCIATED INFRASTRUCTURE
Office of Federal Agency Programs**

Background. On December 18, 2025, the U.S. Department of the Army submitted a request for a Program Comment to address its actions for Warfighting Readiness and Associated Infrastructure. The Army has identified a category of actions consisting of training, testing, equipping, and industrial activities, as well as management actions on associated infrastructure, that would benefit from the

ACHP's comment as a whole in lieu of commenting on a case-by-case basis. The Army developed the proposed Program Comment following the solicitation of comments via a Federal Register notice and the convening of six virtual meetings in July and August 2025.

Status. The regulations implementing Section 106, 36 CFR Part 800, require the ACHP to take action on the request within 45 days. The Army provided an additional 15 days for action. Since receiving the Army's request, ACHP staff consulted with State Historic Preservation Officers, Indian Tribes, Tribal Historic Preservation Officers, and Native Hawaiian Organizations through four consultation meetings held the week of January 19, 2026. A public comment period was also opened, and written comments



were accepted until January 26, 2026. A consultation summary is included in the Appendix to inform the Members' discussion.

Following the information session held for Council Members on January 29, 2026, ACHP staff conveyed Member advice regarding necessary adjustments to the Program Comment to the Army. A final version of the document, as well as the ACHP staff's analysis of any remaining issues, will be sent to the Members via email one week before the business meeting.

Action needed. Members should be prepared to discuss the proposed Program Comment and to take action in response to the Army's request.

CULTURAL RESOURCES DATA PLATFORM

Office of Information Technology and Office of External Engagement

Introduction. The Advisory Council on Historic Preservation (ACHP) is advancing an initiative that uses AI-driven tools to accelerate and improve the consideration of historic properties in project planning for infrastructure projects and, in doing so, reduce or avoid impacts to such properties. Use of the platform will result in time savings and cost efficiencies for reviews required by Section 106 of the National Historic Preservation Act (NHPA) and help make the overall permitting process more efficient.

Background. In 2024, the ACHP received funding from the Federal Permitting Improvement Steering Council (Permitting Council) to support a nationwide geographic information system (GIS) mapping initiative. The ACHP has since updated its original proposal to now use technology that will make historic property data more accessible to the Section 106 process without the ACHP assembling or holding datasets itself. The revised approach leverages the latest advancements in AI to create a system linked initially to available GIS cultural resources databases at the state and federal level, and eventually to other sources beyond that.

When developing infrastructure projects, planners must research cultural resource data distributed across federal agencies, states, and Tribes without the benefit of a central system to access the data or the consulting parties involved. Without a solid understanding of the regulatory framework and key sources of information about where historic properties may be located, project proponents – particularly those advancing multi-state infrastructure projects – may miss or face challenges in collecting data that could guide project siting decisions toward locations with less potential to conflict with non-renewable cultural resources. Even experienced project planners can find the initial stages of research time consuming given the distributed nature of the data today. This project seeks to increase the efficiency of new infrastructure project delivery within the NHPA's mandate to consider potential effects to historic properties by connecting project planners with a broad array of information that will rapidly refine project siting decisions and assist them in planning on appropriate efforts to identify historic properties in various locations.



The ACHP's solution involves development of an advanced AI-driven data collection and planning tool, which would initially:

- Retrieve relevant data remotely from disparate systems housing geographical and cultural resource data, including information, where available, on whether areas have been subject to past study or not;
- Generate a project research report to inform early project planning and research needs;
- Offer visual simulation tools to help predict areas of potential resource impacts based on exact geography; and
- Facilitate assessment of project adjustments to optimize location or route planning.

While initial development of the platform will capitalize on publicly available datasets and non-sensitive historic properties data, the ACHP is also committed to developing security protocols to protect or restrict access to sensitive data such as archaeological site information or places of significance to Indian Tribes and Native Hawaiian Organizations. As security features are put into place, the system can grow to include additional data sources with appropriate access limitations.

The ACHP will also work with its contractors and developers to begin including other available non-cultural resource data that may assist planners in siting projects, including but not limited to maps, photographs, geographical data, existing structures and buildings, and other data pertinent to cultural resource management goals and needs.

Next steps. The ACHP is working to integrate the latest Google AI solutions, including agentic deep research, geographic reasoning, and generative AI models, to yield information to help agencies and project proponents target new research or field study to identify historic properties in areas where it is most needed. Contracts are being finalized to support this effort now. Work will begin with a data

landscape survey and include development of a proof-of-concept and pilot system with the goal of beginning public access within 18 months. A unique security architecture will provide for operational security meeting high federal standards. Council Members will receive updates on data platform development with reports on current ACHP initiatives.

The cultural resources data platform aims to significantly expedite and improve Section 106 reviews within federal permitting processes while ensuring robust protection of historic properties through access to survey data, impact predictions, and other insights. This system offers immediate efficiencies for the project planning and permitting process and could also be expanded in the future to further assist with assessing visual and auditory effects, federal land use planning, and national-scale research about historic properties.

Action needed. None. Members are invited to discuss questions about the data platform with ACHP staff.



ACHP MAJOR ACTIVITIES REPORT

Program Comment on Certain Housing Building and Transportation Activities

Since its adoption in December 2024 by the Members of the Advisory Council on Historic Preservation (ACHP), ACHP staff monitor the implementation of the Program Comment by those agencies who have adopted its terms. In 2025, the Department of Defense, the Bureau of Reclamation, and the Rural Business Cooperative and Rural Housing Services have utilized the Program Comment's process. The Department of Housing and Urban Development also recently notified the ACHP of its intent to utilize the Program Comment.

As required by the Program Comment, these agencies have submitted their first annual reports, which have been posted [here](#) on the ACHP's website. In accordance with the Reporting Stipulation, ACHP staff will convene an annual meeting to include State Historic Preservation Officers, Tribes, Tribal Historic Preservation Officers, Native Hawaiian Organizations, and others to solicit their feedback on the Program Comment's implementation. It is anticipated that Members will receive ACHP staff's analysis of the Program Comment, including any suggested amendments for consideration, this summer.

Training

The ACHP recently announced its spring training program, to include virtual offerings of two classroom courses and three webinars. Information on courses can be found [here](#). Members are always welcome to attend these courses; please contact Tanya DeVonish (tdevonish@achp.gov) if you would like to do so.

ACHP Staffing and Organization

ACHP's current staffing includes 17 permanent employees and nine additional term employees secured through interagency agreements across its six offices. An organizational chart is included for member reference in the Appendix. The ACHP has completed its physical reorganization and consolidated its six offices within the west wing of its previous space. Members are welcome to join a hosted tour of the ACHP's offices from 3:30 – 4:30 pm on February 11, 2026, prior to the Member reception at the Arlo Hotel.

ACHP Plans for America's 250th

In alignment with E.O. 14189, *Celebrating America's 250th Birthday*, ACHP staff drafted a plan to celebrate America's Independence and emphasize how historic places tell America's story. The draft plan includes a social media campaign entitled *Preserving the Road to Independence* focusing on sites specific to the formation of this country. The [Preserve the Past, Build for the Future](#) annual webinar series begins on February 25 and will complement the semiquincentennial commemoration by focusing on preserving America's historic places.

The plan also envisions working with federal and external partners on projects that could include producing a video series relating to historic sites to compliment the Department of Transportation's [Great America Road Trip](#), partnering with the Department of the Interior on the [Patriot Program](#) and [Freedom250](#), and collaborating with the ACHP Foundation on a historic preservation-themed student



essay contest.

ACHP staff welcome member input in further developing and implementing these and any additional ideas.



APPENDIX



ACHP STRATEGIC PLAN AND OBJECTIVES

FY 2026-FY 2030

Mission Statement

The Advisory Council on Historic Preservation (ACHP) promotes the preservation of America's historic places and advises the President and Congress on national historic preservation policy.

Vision Statement

A nation in which all Americans can understand and experience their history, and public policy supports the preservation of America's historic places.

Strategic Goal 1

Ensure historic preservation reviews carried out by federal agencies under Section 106 of the National Historic Preservation Act (NHPA) are timely, effective, efficient, and fully engage all stakeholders with a demonstrated interest in the undertaking's effects to historic properties as well as engaging consulting parties in consultation to find solutions that balance the needs of federal projects and the national economy with the preservation of historic places, while upholding the ACHP's federal Tribal trust responsibility.[54 USC 306108; 54 USC 304108; 36 CFR Part 800]

Four-Year Strategic Objectives

- A. Enhance the awareness, knowledge, and capabilities of agencies, applicants, and participants in Section 106 reviews to better carry out their roles in the process, and to improve communication among these parties.
 1. *Develop Section 106 advice and guidance on priority topics and issue periodic Section 106 newsletters.*
 2. *Develop and deliver engaging online and in-person Section 106 training for federal agencies, states, Indian Tribes, Native Hawaiian Organizations (NHOs), and other users of the Section 106 regulations.*
 3. *Explore development of a system to collect, evaluate, and publish data from federal agencies and their applicants on the financial and administrative costs incurred in meeting Section 106 requirements, including but not limited to, payments made to contractors and consultants.*
 4. *Focus ACHP involvement on individual Section 106 cases to serve the public interest, address Administration priorities, and advance preservation outcomes in accordance with Appendix A of 36 Part 800.*
 5. *Focus ACHP participation on individual cases related to projects and programs prioritized by the Administration or where the investment of ACHP resources can help ensure consideration of effects to historic properties in critical infrastructure development.*

6. *Engage ACHP members in complex or controversial cases that raise policy-level issues warranting attention in order to successfully conclude Section 106 reviews.*
- B. Collaborate with federal agencies, project applicants, State and Tribal Historic Preservation Officers, Tribes and other stakeholders to tailor the Section 106 process to meet specific federal agency needs, with the goal of improving the efficiency and effectiveness of the Section 106 process in the context of agency missions, project schedules, and budgets.
1. *Encourage, educate, and assist federal agencies in developing flexible approaches to Section 106 review while encouraging preservation outcomes that support project delivery within reasonable timelines and budgetary constraints.*
 2. *Provide timely advice to those agencies that have requested program alternatives on the steps necessary to develop and issue alternatives within reasonable timeframes and with appropriate stakeholder input; inform and engage ACHP members in the development of those alternatives requiring their approval.*
 3. *Assist federal agencies in meeting their Section 106 consultation responsibilities with Indian Tribes and NHOs and encourage early engagement with Tribes and NHOs during project planning, with particular attention to the meaningful incorporation of **Indigenous Knowledge (IK)** and the identification and evaluation of historic properties of religious and cultural significance to them.*
 4. *Share guidance regarding Tribal and NHO consultation and Indigenous Knowledge, including the ACHP's Policy Statement on Indigenous Knowledge and Historic Preservation, on the ACHP's website and through targeted communications channels.*
 5. *Through interagency initiatives, working groups, and collaboration with the National Association of Tribal Historic Preservation Officers and Tribal Historic Preservation Officers, promote and encourage the use of tools that improve consultation and communication with Indian Tribes in Section 106 reviews.*
- C. Improve coordination of the Section 106 process with other provisions of the NHPA, related federal environmental and preservation processes, and federal regulatory accountability requirements and initiatives.
1. *Support federal permitting process improvements and effective review coordination as a member of the Federal Permitting Improvement Steering Council.*
 2. *Advance coordination of National Environmental Policy Act and Section 106 reviews in collaboration with the Council on Environmental Quality to encourage effective and timely alignment of the two review processes.*
 3. *Support coordination of Section 106 with other related federal environmental laws.*
 4. *Review Section 106 implementing regulations for possible revisions to encourage*

consistent and efficient review processes.

- D. Assist agencies in meeting their responsibilities in the Section 106 process and encourage agencies to identify and engage all stakeholders and the public early in project planning and Section 106 review.
 - 1. *Provide advice and information on involving consulting parties and the public in Section 106 review via the ACHP's website, in training programs and presentations, and through other communications channels.*
- E. Promote availability of accurate and accessible non-sensitive digital and geospatial information about historic properties to inform project planning and assist agencies in avoiding and minimizing adverse effects of their projects on historic properties and in expediting project review.
 - 1. *Develop and implement strategies to enhance availability of geospatial data on identified historic properties.*
 - 2. *Collaborate with State Historic Preservation Officers and federal agencies to utilize data standards and other tools to facilitate interagency data exchange in the Section 106 review process.*

Strategic Goal 2

Foster broader appreciation for and knowledge of America's irreplaceable heritage and the work of the ACHP and communicate the value and benefits of maintaining and enhancing historic places for future generations of Americans. [54 USC 304102(a)(1), (2), (5) and (7)]

Four-Year Strategic Objectives

- A. Collaborate with federal agencies and other stakeholders to publicize (and assist in implementing, where appropriate) federal agency program initiatives and achievements that integrate the successful preservation and productive use of historic properties.
 - 1. *Collaborate with new and existing partners to publicize the preservation work of the federal government.*
 - 2. *Recognize federal agency historic preservation achievements through agency publicity efforts, and when possible, in coordination with federal and external partners.*
- B. Raise the level of understanding of the value of the nation's historic places and of the provisions of the NHPA.
 - 1. *Through social media, its website, and other channels, provide content that conveys the importance and impact of the national historic preservation program.*
 - 2. *In order to foster the next generation of historic preservationists, provide learning experiences for students **and emerging professionals [ACHP Foundation]** through a variety of **internship and similar [ACHP Foundation]** opportunities in collaboration with partners.*
- C. Increase awareness of and participation in ACHP programs and activities.

1. *Continue participation and seek new opportunities to participate in inter-agency and nongovernmental stakeholder convenings, both via ACHP members and staff, to highlight the importance of historic preservation and the ACHP's work to support the federal historic preservation program.*
 2. *Identify new audiences and expand outreach to include them, when relevant, in the ACHP's Section 106 training and other educational programs.*
- D. Collaborate on, develop, and advance policies and initiatives that promote the benefits of historic preservation and the national preservation program.
1. *Engage with ACHP members to promote their preservation programs and priorities in alignment with Administration priorities.*
 2. *Through participation in Administration initiatives and on interagency working groups, increase support for the national preservation program and its value in understanding our shared history.*
- E. Engage members of stakeholder groups and the public to share their expertise with the ACHP through working groups, advisory groups, and other collaborations.
1. *Foster relationships with intergovernmental organizations and professional and industry associations to ensure their views inform the work of the ACHP.*
 2. *Utilize assistance from advisory groups to help the ACHP address issues of importance to the agency and to ACHP members.*

Strategic Goal 3

Advise on and advance effective public policies and programs that support and encourage historic preservation activities carried out by the federal government, states, local governments, Indian Tribes, Native Hawaiian Organizations, and private organizations and individuals. [54 USC 304102(a)(1), (3), (4), and (6)]

Four-Year Strategic Objectives

- A. Advise executive and legislative branch officials and staff regarding the benefits of historic preservation and the federal historic preservation program.
1. *Identify, and pursue when appropriate, opportunities to promote historic preservation and educate key decision makers.*
- B. Advise and assist the executive branch and the Congress in formulating policies, budgets, and programs that support the goals of the NHPA.
1. *Manage an ACHP legislative agenda and engage on proposed legislation that advances or impacts historic preservation interests and programs.*
 2. *Provide timely responses to inquiries from the White House and Congress regarding ACHP policies, budgets, and programs.*
- C. Encourage and advance federal policies and programs that support the involvement of Indian Tribes, NHOs, and other Indigenous Peoples in the national historic

preservation program.

1. *Seek opportunities with federal agencies and departments to promote the participation and consideration of Indian Tribes and Native Hawaiian Organizations in historic preservation programs and activities.*
 2. *Encourage the development of best practices, and promote those of the ACHP, with federal agencies regarding the roles of Tribal Historic Preservation Officers, Indian Tribes, and NHOs in the national historic preservation program.*
- D. Encourage and advance federal policies and programs that support the involvement of State Historic Preservation Officers (SHPOs) and all by-right consulting parties in the national historic preservation program.
1. *Seek opportunities with federal agencies and departments to promote additional resources for SHPOs to support their work under the national historic preservation program.*
 2. *Assist non-federal partners in the Section 106 review process.*

Strategic Goal 4

Manage resources effectively to ensure the ACHP's mission is accomplished while meeting high standards of service and organizational excellence. [54 USC 304105]

Four-Year Strategic Objectives

- A. Maximize internal operational performance through analysis of work processes, enhancements to Information Technology resources, changes to administrative procedures, implementation of effective records management, and the refinement of fiscal controls.
1. *Acquire or develop a more streamlined application/platform for the internal routing and approval of tasks, such as procurement and travel.*
 2. *In response to Executive Order 14240 "Eliminating Waste and Saving Taxpayer Dollars by Consolidating Procurement," develop and execute a plan to migrate existing contracts and the procurement of future common goods and services for the ACHP to the General Services Administration.*
- B. Identify and provide enhanced services to all parties that interact with the ACHP, leading to measurable results.
1. *Improve service interactions with the ACHP by adding artificial intelligence (AI)-based tools to the ACHP's web products and Section 106 intake processing.*
 2. *Use latest technologies, including advancements in AI, to improve review efficiency and facilitate exchange of information with other federal agencies.*
- C. Institute policies and internal processes to guide interaction and communication among the chairman, members, and staff, particularly regarding controversial Section

106 cases, development of Section 106 program alternatives, preservation policy development, and White House and congressional communications.

1. *Use contemporary communications technologies to promote information sharing among ACHP members and staff.*



**Consultation Summary on the
Proposed Program Comment for
Army Warfighting Readiness and Associated Infrastructure**

January 30, 2026

In accordance with 36 CFR § 800.14(e), the ACHP has conducted consultation with SHPOs, Indian Tribes, THPOs, and NHOs on the Army's requested program comment (PC). The ACHP held four virtual consultation meetings: two with SHPOs and two with Tribes/THPOs/NHOs. The ACHP also solicited written comments through January 26, 2026. During the consultation meetings, attendees provided verbal comments on the proposal and shared their concerns and questions. Notes from those meetings, including a list of participants for each meeting, can be found in Appendix A. Written comments were submitted by 23 State Historic Preservation Officers (SHPOs), 3 Tribes and Native Hawaiian organizations, and 8 members of the public or organizations representing historic preservation interests¹. Copies of the comments can be found in the [Program Alternatives in Development OneDrive](#).

The following reflects a narrative summary of comments made during the consultation meetings and in written comments. They are presented in general order of most to least comments made.

Scope and Applicability of the Program Comment

Comments were consistent that the undertakings subject to the PC's terms were vague, broad, and insufficiently defined. Comments highlighted that past Army program comments had a discrete set of actions related to a specific property type. Comments questioned how certain activities or programs, like the Readiness and Environmental Protection Integration (REPI) Program, related to warfighting readiness activities. Comments raised concerns about the precedent-setting nature of using an agency's mission as the category of undertakings. Comments were also concerned about the allowance for the PC's applicability to be expanded to include other military departments.

Comments suggested that another program alternative type would be more appropriate to achieve efficiencies, such as a nationwide programmatic agreement. Comments noted that the PC effectively functioned as an exemption under 36 CFR 800.14 (c) without following the appropriate process for its development or meeting the necessary thresholds of minimal or non-adverse effects. Comments noted that the PC lacks specific goals, supporting data, solid reporting, and measurable outcomes to gauge the impact of its implementation, if adopted. Comments highlighted that the PC's application on lands not managed by the Army minimized the justification that Army, as the property manager, is most familiar with the property's historic significance. Comments noted that the PC lacked a clear justification for needing to expedite reviews of undertakings located on lands not managed by the Army.

Effect on Existing Agreements

Comments requested that the provision terminating existing Memoranda of Agreement (MOAs), Programmatic Agreements (PAs), and Army Alternate Procedures (AAPs) be removed, unless

¹ Two comments were submitted to the ACHP after the due date, from the New York Landmarks Conservancy and the Hawaii SHPO. Both are included in the comment count received for this summary.

agreements are terminated in accordance with the relevant termination processes. Comments opined that a PC cannot be used to supersede the termination clauses in individual, legally binding agreements. Comments noted that several Section 106 agreements listed in the appendix do not appear to relate to warfighting readiness resources and should be excluded from the PC. Finally, comments noted that given that some installations are in the midst of implementing mitigation measures under executed Section 106 agreements, unilateral termination of the agreement terms would call into question the requirement for the Army to comply with Section 106 before implementing an undertaking.

Minimization of Consultation and Public Involvement

Comments highlighted the removal of consulting parties from the federal decision-making process, particularly SHPOs who have a specific role under the terms of the National Historic Preservation Act (NHPA). Comments noted that the NHPA and Section 106 process are intended to facilitate transparent decision-making, and the proposed PC relies on the Army's unilateral decisions without input from any others. Comments noted that the minimization of the role of consulting parties keeps them from being able to have a voice in decisions that impact historic properties within their communities, which appears inconsistent with the purpose and intent of the NHPA. Comments noted that the proposed PC removes any opportunity for the American public to engage in consultation regarding historic preservation efforts on land now held by the Army. Comments noted the minimization of public involvement and underscored that the public (including veterans and veterans' organizations) should have a voice in the preservation of our nation's military heritage.

Administrative Provisions (Duration, Amendment, Annual Meeting and Oversight)

Comments observed that the PC's duration should be set to a specific time, rather than occurring in perpetuity. Comments on the PC's amendment process noted the need for the Council membership to consider any amendments. Comments raised concerns that the ACHP Chair would be empowered to unilaterally extend the PC to the other military departments of the Department of Defense.

Comments requested that additional mechanisms be added for external oversight to ensure accountability. Comments asked for clarification of who would make decisions at installations regarding activities excluded from further review. Comments suggested that annual meetings be required for the duration of the PC.

Identification of Historic Properties

Comments pointed out that the use of military landscapes as the main property type identified by the PC minimizes the significance properties may have at the state or local level, or the other National Register criteria for significance. Comments noted that by focusing solely on military landscapes, the PC does not account for pre-contact and non-military archaeological or built-environment resources that are not part of a military landscape. Comments were received noting that the Army's use of standard construction plans for installations does not impact eligibility for listing in the National Register and does not account for situations where local climate, geography, topography, missions, and needs necessitated the construction of non-standardized buildings. Comments observed that many properties owned or occupied by the Army do not have direct warfighting connections, including but not limited to, archeological sites, military cemeteries, and buildings and structures with significance that go beyond the Army's use. Comments noted that the PC did not have a requirement for any ongoing evaluation of properties to address the evolution of what may be considered historic, either with the passage of time, emergence of new historical themes and patterns, increased rarity, or other factors.

Mitigation of Adverse Effects

Comments in this category noted that standard mitigation may not always be appropriate, given the broad

range of properties and undertakings proposed to be covered by the PC. Further, documentation may not always be in the public interest, or equivalent to the adverse effect created by the undertaking. Comments noted that the PC relies on the idea of “acceptable loss,” for which no mitigation would be required, observing that resolution of adverse effects is required in Section 106. Comments highlighted concerns with the use of National Mitigation Areas, which may not have a nexus to an undertaking’s adverse effect. Comments asked for clarification on the relationship of National Mitigation Areas with standard mitigation and alternative mitigation. Finally, comments noted that mitigation should be related to the affected communities and not occur in other states.

Assessment of Effects

Comments noted the PC eliminated the consideration of a broad range of effects by only focusing on ground disturbance. Comments noted that the reliance on exterior, front-facing facades could result in the destruction of historic fabric. Comments also noted that the mandate to use substitute materials was inconsistent with the Secretary of Interior’s Standards for Rehabilitation and the lack of a specific list of acceptable substitute materials in the PC would result in significant loss of historic fabric.

Tribal Consultation

Comments requested that the PC include a clearer process for consulting with Tribes and Native Hawaiian Organizations (NHOs) when an undertaking may have an effect or adverse effect on historic properties of religious and cultural significance. Comments requested more detail as to how Tribes and NHOs will be informed about undertakings so that they can provide information about affected properties. While Indigenous Knowledge is reflected in the PC, comments highlighted that it is unclear how the Army will utilize that information in its assessment and resolution of effects.

Qualified Professionals and Staffing

Comments in this category noted that the Army’s staffing over the last year may have significantly changed, and the Army should confirm that qualified staff are employed at each installation. Comments underscored that decisions related to the identification and evaluation of historic properties, assessment of effects, and mitigation of adverse effects (i.e., application of standard and alternative mitigation) should be made by qualified professionals. Comments requested that the PC either include a clear requirement that each installation have a qualified professional on staff or include criteria for the selection of qualified cultural resource management firms. Comments asked that the PC include clear technical preservation guidance provided to those qualified professionals who would implement the PC, if adopted.

National Historic Landmarks

Comments suggested that National Historic Landmarks (NHLs) be excluded from the PC, given the higher standard of care required by Section 110(f) of the NHPA. Comments observed that the PC did not outline specific procedures that would demonstrate how the Army has met the required higher standard of consideration, other than acknowledgment of the requirements of Section 110(f) and a commitment to do so as long as it does not result in undue costs.

Coordination with NEPA

Given recent changes with the National Environmental Policy Act (NEPA), comments requested that the Army clarify how NEPA reviews will allow for the opportunity to participate in consultation, as well as sufficient information on identification and assessment efforts.

Inadvertent Discoveries

Comments noted that the disclosure of discoveries in the annual report would eliminate the opportunity to provide timely comments addressing such situations. Comments highlighted that there may be state laws

that apply to inadvertent discoveries.

Arlington National Cemetery

A comment was received expressing concern that the activities at the Arlington National Cemetery would be subject to the PC, as it is a military memorial and does not meet the definition of a military landscape as outlined within the PC.

Appendix A

**Consultation Meeting Summaries
January 20 – 23, 2026**

Proposed Program Comment for Army Warfighting Readiness and Associated Infrastructure
 Consultation Meeting with State Historic Preservation Officers
 January 20, 2026, 3:00-4:00pm EST

Attendees:

- ACHP Staff:
 - Executive Director Reid Nelson
 - OFAP - Jaime Loichinger, Rachael Mangum, Alex Toprac
 - OGC – Kelly Fanizzo, Kathryn Ore
- 15 representatives from State Historic Preservation Offices (SHPO)
- National Conference of State Historic Preservation Officers (NCSHPO)

Executive Director Reid Nelson introduced himself and welcomed participants to the consultation meeting. He then asked Jaime Loichinger, Director of the Office of Federal Agency Programs, to provide an overview of the Army's request and key provisions within proposed Program Comment. After the conclusion of the presentation, participants were offered the opportunity to provide comments or ask additional questions.

Chad Slider, Indiana SHPO, asked about the process for the vote by members and whether there will be the opportunity to propose amendments. Mr. Nelson clarified that ACHP staff have the ability to identify areas that would benefit from revision, but these are typically discussed with the requesting agency to consider which changes are possible. Program comments are approved by the Council membership, but staff are responsible for providing members with an analysis of the proposed Program Comment as well as a summary of the consultation that has been conducted, to inform their vote, which is planned for the February 12, 2026, business meeting.

Erik Hein, NCSHPO, asked whether Council staff are confident that the vehicle in its current form is legal. Kelly Fanizzo, OGC, noted that the staff analysis will include an overview of the legal sufficiency and share potential legal concerns in the staff analysis for Council members to consider in their deliberation.

Erik Hein Followed up by asking whether the proposed Program Comment is better suited to an exemption as a program alternative, given that a program comment would typically address Section 106 compliance for a finite category of activities rather than such a broad range of activities. NCSHPO members were encouraged to share comments and questions on a range of topics based on the Program Comment, including the provision for terminating existing agreements and whether this is the appropriate program alternative. Mr. Nelson noted that staff previously provided advice to the Army on the appropriate program alternative, but it was ultimately Army's decision as to which program alternative to pursue.

Barbara Howard, Minnesota SHPO, observed that it did not appear that the Army made many changes to the proposal in response to any comments made by SHPOs or other parties. She also commented that the program comment plan, as presented by the Army in its series of meetings in the summer of 2025, included comment periods as part of the NEPA process as well as an internal Army review board, but these appear to have been omitted from what was submitted to the ACHP for action.

Chad Slider asked whether staff could provide any guidance as to what comments would be most useful from SHPOs, given the range of comments from broad and substantive to granular issues. Examples of granular issues include limited preservation outcomes (e.g., only the façades of buildings are prioritized). He also asked whether the ACHP has ever received such a sweeping request for a program comment. Mr.

Nelson said all comments are useful, and that staff would also appreciate any ideas from SHPOs on solutions to address those issues. While this program comment covers a broader range of activities than any other program comment, other types of program alternatives are in effect that are also broad in their scope, such as the nationwide programmatic agreement (PA) for the Bureau of Land Management.

Chad Slier followed up by asking whether the Army considered a nationwide PA instead of a program comment, and whether the proposed program comment could be amended to be applicable to other Department of Defense agencies. In responding, Mr. Nelson noted that the amendment process could allow other Department of Defense agencies to utilize the program comment's terms, however, it would be dependent on their needs and capabilities.

Jenny Bellville-Marrion, Virginia SHPO, asked about the concerning language regarding Section 106 in the front matter of the program comment proposal. Ms. Loichinger acknowledged that this language was Army's justification for requesting a program comment, and if adopted, the language would need to be adjusted to reflect the ACHP's action on the Army's request.

A chat message noted that a provision in the National Defense Authorization Act (NDAA) allows the use of existing program comments by other military branches. Ms. Loichinger acknowledged that language, and also observed that staff typically advise that individual program comments be amended following the provisions in those program comments rather than being adopted through law.

Anne Brockett, District of Columbia SHPO, asked whether each installation must have staff that meets the professional qualifications set by the Secretary of the Interior. Ms. Loichinger noted that concern.

Erik Hein, NCSHPO, again emphasized the importance of SHPOs making comments for the purpose of the administrative record.

In closing, Ms. Loichinger confirmed that the meeting notes will be reflective of comments made verbally and through the chat, and that comments made during the meeting will also be reflected in the consultation summary provided to the ACHP membership. Mr. Nelson closed the meeting by thanking participants for their attendance and reiterating that comments are accepted through January 26, 2026.

SHPOs represented:

- Alabama
- Arizona
- California
- Delaware
- District of Columbia
- Georgia
- Idaho
- Indiana
- Maryland
- Minnesota
- Montana
- New Mexico
- Ohio
- Pennsylvania
- Virginia

Proposed Program Comment for Army Warfighting Readiness and Associated Infrastructure
Consultation Meeting with Tribes, Native Hawaiian Organizations and Tribal Historic Preservation
Officers
January 21, 2026, 4:00-5:00pm EST

Attendees:

- Vice Chair Travis Voyles
- ACHP Staff Members:
 - Executive Director Reid Nelson
 - OFAP - Jaime Loichinger, Rachael Mangum, Alex Toprac
 - OGC - Kelly Fanizzo, Kathryn Ore
 - OEE – Ashley Fry
- Representatives from four Tribal Nations

Vice Chair Travis Voyles introduced himself and welcomed participants to the consultation meeting. He then asked Jaime Loichinger, Director of the Office of Federal Agency Programs, to provide an overview of the Army's request and key provisions within proposed Program Comment. After the conclusion of the presentation, participants were offered the opportunity to provide comments or ask additional questions, starting first with Tribal and Native Hawaiian leaders, followed by other designees. As no leaders were in attendance, designees were able to ask questions and make comments immediately following the presentation.

Jeff Bendremer, Stockbridge Munsee Band of Mohican Indians, asked how many Section 106 agreements would this program comment would affect. Jaime Loichinger, OFAP Director, noted that 115 are listed in Appendix E of the program comment (Appendix E). Mr. Bendremer observed that a lot of work would be undone with terminating these agreements and while his Tribe might not be directly affected, he understood the gravity of that change.

Holly Houghten, Mescalero Apache Tribe, asked about application of the program comment on National Guard land. Ms. Loichinger responded that Section 8 of the proposed Program Comment indicated it would apply to all Army undertakings on Army installations, Army Reserve and Army National Guard property.

Ms. Houghten followed up by sharing concerns about management actions being subject to the Program Comment's terms that would not be reviewed for effects to properties of importance to Tribes. Tribal feedback is important as these properties are not only archaeological in nature. She shared a recent experience with a fort that utilized expedited review for an emergency undertaking where Tribal input was not meaningfully considered or resolved. She also asked how comments made in these meetings will be shared with the Army and with consulting parties. Mr. Nelson confirmed meeting notes will be developed and included as part of the ACHP's administrative record, and be distributed to the members as they consider their vote on the Army's request.

Mr. Bendremer asked whether there will be similar request for a program comment from other military service branches. Mr. Nelson responded that other branches haven't indicated whether they plan to propose or adopt these program comments.

Vice Chair Voyles closed the meeting by thanking participants for their comments and noted that written comments may be provided until January 26.

Tribal Nations represented:

- Confederated Tribe of the Umatilla Indian Reservation
- Mescalero Apache Tribe
- Quinault Indian Nation
- Stockbridge Munsee Band of Mohican Indians

Proposed Program Comment for Army Warfighting Readiness and Associated Infrastructure
 Consultation Meeting with State Historic Preservation Officers
 January 22, 2026, 3:00-4:00pm EST

Attendees:

- ACHP:
 - Executive Director Reid Nelson (RN)
 - OFAP – Jaime Loichinger, Rachael Mangum, Alex Toprac, Sarah Beimers
 - OGC – Kelly Fanizzo, Kathryn Ore
- 16 representatives from State Historic Preservation Offices
- National Conference of State Historic Preservation Officers (NCSHPO)

Executive Director Reid Nelson introduced himself and welcomed participants to the consultation meeting. He then asked Jaime Loichinger, Director of the Office of Federal Agency Programs, to provide an overview of the Army's request and key provisions within proposed Program Comment. After the conclusion of the presentation, participants were offered the opportunity to provide comments or ask additional questions.

Anne Raines, Maryland SHPO, asked whether there were any other activities the Army conducts that would not be covered by this Program Comment and its existing program comments on historic housing. Ms. Loichinger responded that it appeared likely that all the Army's activities would then be addressed by program alternatives.

Anne Raines followed up asking whether some parts of the Program Comment would be edited, noting Section 5's broad assertions. Ms. Loichinger responded that some of the early sections of the proposed Program Comment present the Army's justification for a program comment, which would be removed or edited if it were to be adopted by the ACHP and published in the Federal Register. Kelly Fanizzo, OGC, suggested that SHPOs focus their review on the proposed Program Comment's procedures rather than the rationale. For program comments that have been adopted, the ACHP includes its own background information and the reasoning for the approach, not all of the information included in the Army's proposal.

Erik Hein, NCSHPO, asked ACHP staff to walk through the step-by-step process of the ACHP's review of the comment, its ability to propose new or changes to language, and how this would be brought to the members for their consideration. Ms. Loichinger replied that this week was focused on the consultation with SHPOs, Tribes and Native Hawaiian Organizations. Next week a members information session will occur where ACHP staff will summarize the consultation and comments received and present any remaining issues for the members to discuss. As currently planned, at the February 12, 2026, business meeting there will be formal member discussion of this as an agenda item and then, if a motion is made, a vote on whether to approve the Program Comment. Mr. Nelson added that members may direct staff to seek adjustments with the Army. Staff will spend time with the Army to make those adjustments before presenting a final program comment for adoption at the February 12 business meeting. He also provided information on the voting requirements as outlined in the ACHP's Operating Procedures.

Anne Raines, Maryland SHPO, asked whether the Program Comment's perpetual duration could be adjusted. Ms. Loichinger noted that comment, and observed other commenters had similar concerns with the proposed duration.

Scott Slagor, Michigan SHPO, shared his concerns with the proposal to terminate existing agreements,

and whether and how this will affect installations that are already doing some unique recordation as mitigation, for example photogrammetric scanning, scale models, and developing exhibit space. He notes that work on implementing these types of mitigation measures has already been started, and asked how that work may be affected. Ms. Loichinger thanked him for the comment and question.

Erik Hein commented that a program comment cannot terminate each agreement, which would instead require following its own terms for termination. He asked whether there was precedent for a program comment to void entire aspects of other program alternatives. Mr. Nelson replied that a number of program comments are from the military; while some of these have modified or taken the place of an existing program alternative, staff has not seen a program comment that would have the effect of subsuming other program comments or cover this extent of an agency's actions.

Gwen Davis, Delaware SHPO, asked about the staff's efforts to prepare members to take action on this and other program alternatives, especially when it may be their first business meeting. She also asked whether staff had an expectation that there could be changes if presented for a vote by the membership. Mr. Nelson observed that program comments typically are changed to some extent following submittal of a proposal. He also emphasized the new member orientation, which provides an overview of program alternatives and the responsibility of members. During the information session, staff will provide advice and ideas about how the proposal can be improved. He finished by noting that while the ACHP can issue a program comment contrary to what an agency requested, there wouldn't be much interest in doing that if the agency was unwilling or unable to implement the program comment's terms.

Gwen Davis made a follow up comment that using a program comment as the vehicle is deeply concerning, particularly given that the Army appeared to have given limited consideration to the comments SHPOs made in this regard. She asked whether or how alternate procedures or a different program alternative would be better than the proposed program comment. Mr. Nelson replied that some program alternatives fit better than others, depending on the undertakings and affected historic property types and goals of the program alternative. Staff has opined that alternate procedures may be a better fit, but ultimately, it is Army's decision as to what strategy they want to pursue.

Jenny Belleville-Marrion, Virginia SHPO, asked whether Council meetings are public. Mr. Nelson noted that they are, but that due to budget constraints, the ACHP is not able to livestream this meeting. The meeting's exact location was being determined at the time of the meeting, but would be near the ACHP's offices in the National Building Museum.

Erik Hein asked in the chat whether the staff's analysis will contain the opinion that a program comment is not the correct program alternative. Ms. Loichinger replied that the staff analysis is in the process, and will outline the top issues for members' consideration. Mr. Nelson emphasized again that while staff had an opinion as to the most appropriate program alternative, it is ultimately the agency's responsibility to determine which program alternative they will request.

Erik Hein asked whether more time could be provided for member consideration. He also observed that some SHPOs may be reluctant to make comments again given the limited consideration they were given by the Army as well as a feeling that the approval of the program comment is inevitable. He encouraged SHPOs to comments in the meeting if time was not available for written comments. He observed that there were common themes so far: the broad scope of the proposal; the de facto exemption of activities; the duration in perpetuity; and the voiding of existing agreements. Ms. Loichinger commented that she was available to receive comments after the meeting by phone or virtual meeting, if that would facilitate any timely comments from SHPOs.

Anne Raines added the broad issues from the Maryland SHPO's perspective are: inadequate identification, assessment, or resolution of adverse effects; insufficient mitigation; the exclusion of visual, atmospheric, and audible effects as potential adverse effects; the exclusion for interior changes; and the use of qualified professionals consistently across installations. Concerns about the qualifications of historic preservation professionals, noting the program comment language sometimes says "installation" instead of "cultural resources manager/CRM" specifically.

Sam Henderson, Virginia SHPO, noted her support of previous comments in the meeting. Her questions relate to the legality of terminating agreements and the status of implementing outstanding mitigations among other things. Their letter is seven (7) pages. The proposed program comment does not acknowledge that there may be historic properties that pre-date the Army's use of these sites. She also shared her concern with the potential application of this program comment to Arlington National Cemetery, which is not a warfighting readiness facility.

Sarah Carr, Delaware SHPO, shared her concern with the process that allowed installations to unilaterally create lists of routine undertakings that do not require further consultation. She also noted that while anything post-1941 would no longer be subject to review, documentation is being declassified that may shed light on properties that were previously considered not eligible. This additional information is not yet known, and these resources would no longer be subject to section 106 review. There would be no further review of any resources with (or without) a determination of eligibility.

Brad Patterson, Texas SHPO, shared that Council members should give serious consideration to their credibility as a federal historic preservation agency if this program comment were adopted. While this is currently the Army's proposal, if adopted, it would become the Council's program comment, and the consequences of that decision would fall to the members.

Mr. Nelson thanked everyone for their attendance and comments; Ms. Loichinger shared her contact information and reminded participants how to submit comments. The meeting then closed.

SHPOs represented:

- Alabama
- Alaska
- Arizona
- Colorado
- Delaware
- Iowa
- Kentucky
- Maryland
- Michigan
- Minnesota
- Montana
- Nebraska
- New Jersey
- New Mexico
- Texas
- Virginia

Proposed Program Comment for Army Warfighting Readiness and Associated Infrastructure
Consultation Meeting with Tribes, Native Hawaiian Organizations and Tribal Historic Preservation
Officers
January 23, 2026, 11:00 – 12:00 P.M. EST

Attendees:

- ACHP Council Member:
 - Vice Chair Travis Voyles
- ACHP Staff:
 - Executive Director Reid Nelson
 - OFAP – Jaime Loichinger, Rachael Mangum, Alexander Toprac
 - OGC – Kathryn Ore
 - OEE – Ashley Fry
- Representatives from 3 Tribal Nations

Vice Chair Travis Voyles introduced himself and welcomed participants to the consultation meeting. He then asked Jaime Loichinger, Director of the Office of Federal Agency Programs, to provide an overview of the Army's request and key provisions within proposed Program Comment. After the conclusion of the presentation, participants were offered the opportunity to provide comments or ask additional questions, starting first with Tribal and Native Hawaiian leaders, followed by other designees. As no leaders were in attendance, designees were invited to ask questions and make comments immediately following the presentation.

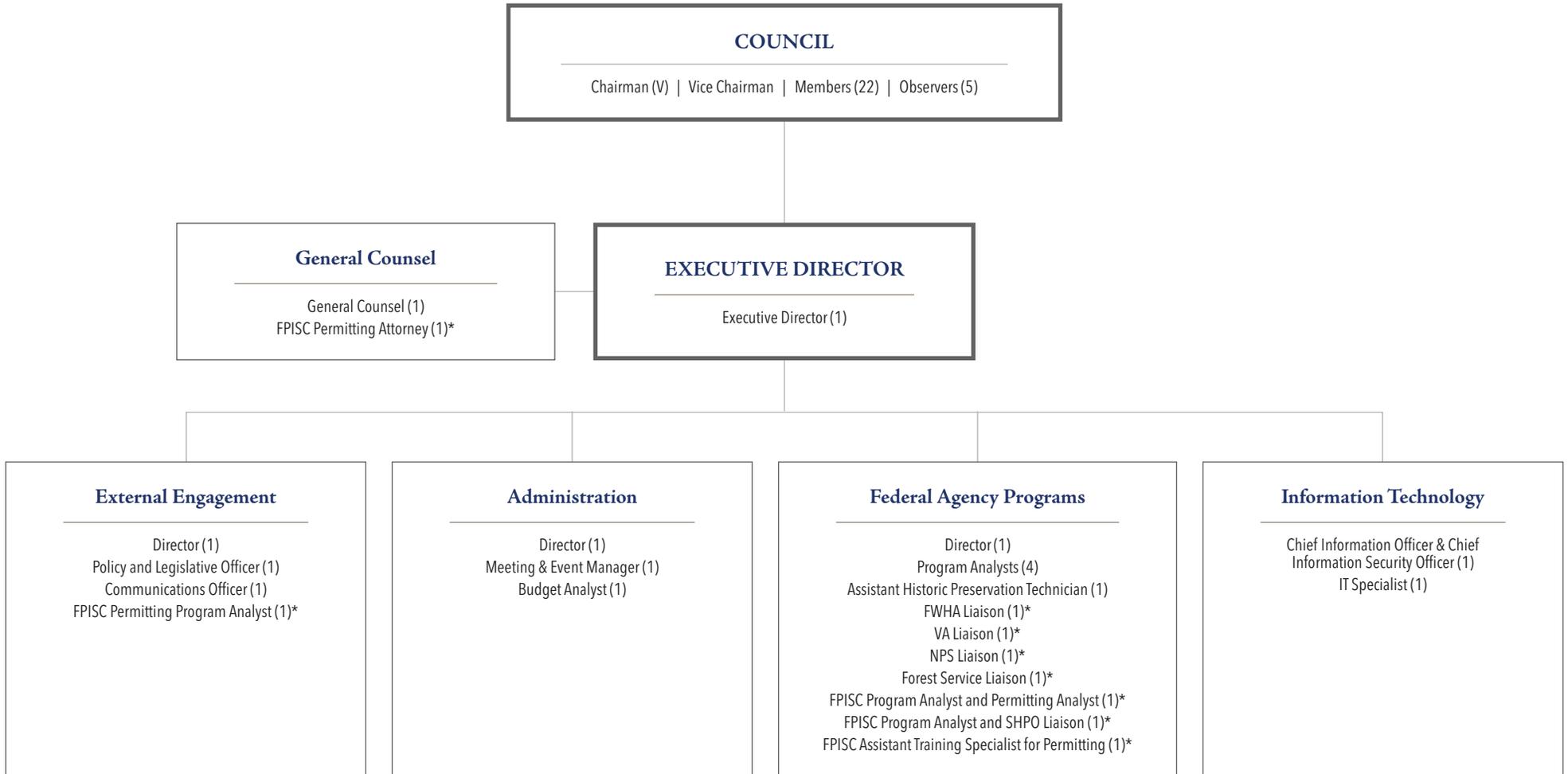
There were no comments or questions by those in attendance and the meeting adjourned following closing remarks by Travis Voyles.

Tribal Nations represented:

- Chickasaw Nation
- Choctaw Nation of Oklahoma
- Mohegan Tribe of Indians of Connecticut



ACHP Organizational Structure | January 2026



Key

- FHWA=Federal Highway Administration
- FPISC=Federal Permitting Improvement Steering Council
- NPS=National Park Service
- SHPO=State Historic Preservation Office
- V=Vacant
- VA=Department of Veterans Affairs

*Term positions funded by other federal agencies.