



MINUTES

FEBRUARY 2026 MEMBERS MEETING

ADVISORY COUNCIL ON HISTORIC PRESERVATION

FEBRUARY 12, 2026

WASHINGTON, DC

MEETING
ADVISORY COUNCIL ON HISTORIC PRESERVATION
February 12, 2026
9:00 a.m. – 12:00 p.m. ET
Arlo Hotel
Washington, DC

Call to Order 9:00 a.m.

- 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. Recission 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. Mapping Project Update
 - A. Background and goals
 - B. Next steps

- VII. New Business

- VIII. Adjourn

IN ATTENDANCE

MEMBERS

Vice Chairman Travis Voyles
 Michael Boos
 Margaret Everson
 Jaime Gardner
 Rick Gonzalez
 Marik String
 Kyle Scherer
 John Tahsuda III
 Emmie Addamus, Designee for Governor Jeff Landry
 Mayor Robert Simison
 Joseph Imamura, for the Architect of the Capitol
 Hon. Katherine Scarlett, for the Council on Environmental Quality
 Bryan Horn, for the Department of Housing and Urban Development
 Aaron Calkins, for the Department of the Interior
 John Thomas, for the Department of Veterans Affairs
 Kristin Thomasgard, for the Department of War
 Ira Matt, for the National Association of Tribal Preservation Officers
 Anne Raines, for the National Conference of Historic Preservation Officers
 Carol Quillen, for the National Trust for Historic Preservation Officers

OBSERVERS

John Fowler, for the ACHP Foundation
 Stephanie Paul, for the National Alliance of Preservation Commissions
 Emily Domenech, for the Permitting Council
 Ann Walker, for Preserve America Youth Summit
 Patrice Frey, for RePurpose Capital

Advisory Council on Historic Preservation (ACHP) staff participating in the meeting were Executive Director Reid Nelson, General Counsel Kelly Fanizzo, office directors Ashley Fry, Jaime Loichinger, and Rezaur Rahman, and Policy and Legislative Officer Blythe Semmer.

PROCEEDINGS

ACHP Vice Chairman Travis Voyles called the February 2026 Members meeting to order at 9:00 a.m. February 12, 2026. He acknowledged that budget realities precluded the meeting from being livestreamed, however an audio recording would be quickly posted to the [ACHP YouTube channel](#).

The Members approved both the meeting agenda and November 24, 2024, Members meeting minutes by a voice vote.

Vice Chairman Voyles summarized his recent activities, including working with the White House on appointments; working with Executive Director Reid Nelson on efforts to reorganize ACHP operations and reduce budgets and staffing; presenting the joint National Trust/Advisory Council on Historic Preservation Award for Federal Partnerships in Historic Preservation at the 2025 PastForward conference; working with the Administration to rescind outdated regulations; and continued work with the Administration to consider updates to the Section 106 regulations as part of its overall effort to streamline environmental reviews.

Vice Chairman Voyles then spoke about key priorities for the coming year, including working closely with Members to update, improve, and modernize the Section 106 regulations; advancing the use of digital tools to inform project planning and Section 106 reviews; engaging with and highlighting support for the Administration's efforts to celebrate the 250th anniversary of America and show how historic preservation helps tell America's story.

Committees

Vice Chairman Voyles said since the ACHP will hold regular meetings going forward, he wanted to look at the organization and make-up of the Council. In the past, the ACHP typically preceded business meetings with meetings of its three standing committees; Vice Chairman Voyles asked Mr. Nelson to give the details on those committees.

Mr. Nelson said the Regulations and Governance Committee is the largest committee, which advises the members on Section 106 related issues and operating procedures. The Policy and Legislative Affairs Committee works on policy and looks closely at legislation, and the Tribal and Indigenous Peoples Committee advises on policy and guidance relating to Indian Tribes, Native Hawaiians, and Indigenous Peoples. He said the committees tend to meet twice before each business meeting to advise on upcoming issues and prepare for meeting discussion items.

Vice Chairman Voyles asked for Member input on maintaining the current committee structure.

The National Association of Tribal Historic Preservation Officers' (NATHPO) Ira Matt said that while committees are a lot of work for the staff, they are great opportunities to help inform and advance ACHP business and recommend new paths forward. He said he supports the current structure and that NATHPO would like to sit on all three committees.

The National Conference of State Historic Preservation Officers' (NCSHPO) Ann Raines said she finds the committees valuable and would also be pleased to sit on all three.

Jaime Gardner asked Vice Chairman Voyles if any changes to the committees have been discussed, and Mr. Nelson said the Council went through a change in committee focus areas in the last few years. He noted that he feels these current committees will continue to be relevant for the current Members, but ACHP staff would like to hear from Members on the current committee scopes, meeting frequencies, and Member compositions.

John Tahsuda asked if there have been ad hoc committees. Mr. Nelson said the Chairman can appoint ad hoc committees, task forces, and other groups that are temporarily focused on timely topics. The current three committees up for consideration are standing committees to advise the membership on issues pertaining to various topical areas.

Vice Chairman Voyles asked Members to email him with any comments on the committees.

Observers

Vice Chairman Voyles said the Chairman can appoint up to five observers to provide expert advice to the Council. Right now, the Council observers are the ACHP Foundation, National Alliance of Preservation Commissions (NAPC), RePurpose Capital, the Federal Permitting Improvement Steering Council (Permitting Council), and the Preserve America Youth Summit. He noted the recent reappointment of NAPC and the Preserve America Youth Summit to additional 2-year terms, saying he wants to ensure the Council maintains these important viewpoints to inform the business of the ACHP.

Executive Director's Report

Mr. Nelson then provided the Members with information on the agency budget and noted the ACHP requested \$5.151 million for Fiscal Year (FY) 2026. Until January 23, the ACHP operated on continuing resolutions at a level of approximately \$8.3 million. On January 23, the ACHP received funding for the remainder of the fiscal year at a level of \$8.285 million, allowing the agency to accommodate severance pay it is accruing this fiscal year after substantial reductions in force last fiscal year. Additionally, the agency is able to implement its FY 2026 hiring plan, which will allow small adjustments to personnel, accommodate live streaming, and a full-time Chairman (if nominated by the President and confirmed by the Senate). The budget for FY 2027 has not been released yet, and Mr. Nelson will share news about it when he is able.

Mr. Nelson informed the Members that in the past year, ACHP staffing went from about 40 to 17, with an additional nine staff who serve in term positions funded by other federal agencies, most of which will sunset this year. Office space was reduced by about 50 percent and ACHP staff was consolidated into the west end of office space in the National Building Museum. Additionally, Mr. Nelson informed the Members that ACHP staff was reorganized from seven offices to five, combining the offices of Policy and Legislative Affairs; Communications, Education and Outreach; and Tribal and Indigenous Peoples into one new Office of External Engagement. Mr. Nelson said the agency is ready to move forward post-staffing transitions to address important issues.

Mr. Nelson also noted that ACHP staff provided a brief update in the Members report on implementation of the Program Comment that the Council provided in December 2024 for Certain Housing, Building and Transportation projects. ACHP staff received annual reports from agencies that have used the Program Comment and will be querying external stakeholders on how it has been working. ACHP staff intend to provide Members a report on that effort this summer.

Strategic Planning

Ashley Fry, ACHP's Director of the Office of External Engagement, presented Members with text of the ACHP's Strategic Plan, which she projected on to a large screen in the meeting room. Ms. Fry provided background to the Members on the development and use of the Strategic Plan. She informed Members that the Strategic Plan was developed by ACHP staff with input from Members and sets goals for the agency to work toward over the next four years. Broad areas of responsibility include ensuring timely Section 106 reviews, fostering broad public appreciation for historic preservation, advising Congress and the executive branch on effective historic preservation policies and programs, and effectively managing agency resources. She then invited Members to provide any final comments and real-time edits to the version of the Strategic Plan displayed during the meeting and noted that the text she provided there reflected two changes from the version of the Strategic Plan appearing in the Members Briefing book: a correction to accurately refer to Indigenous Knowledge in Strategic Goal 1(B) and the addition of emerging professionals in Strategic Goal 2(B). No objections were made to these additions, and Mr. Matt expressed appreciation for the consistent reference to Indigenous Knowledge.

Mayor Robert Simison asked if the Strategic Plan could include language that explicitly extolled the public value of historic preservation, and Ms. Fry added language to Strategic Goal 2. Margaret Everson then asked if the Strategic Plan reflects current and anticipated funding and staff levels, and Ms. Fry confirmed that it does. Kyle Sherer asked if Alaska Native Corporations could be explicitly listed with Indian Tribes and Native Hawaiian Organizations in the Strategic Plan. Ms. Fry, confirming with ACHP General Counsel, Kelly Fanizzo, said that Alaska Native Corporations are included in the National Historic Preservation Act's (NHPA) definition of "Indian Tribe," which ensures that they are also accounted for in the Strategic Plan language.

Ms. Fry then named the projected version of the amended Strategic Plan “Version 1.2.” Rick Gonzalez moved to have the Strategic Plan approved by the Council and that motion was seconded. Version 1.2 of the Strategic Plan was unanimously approved by the Council.

Regulatory Updates

Vice Chairman Voyles said he believed it is time to take a close look at the Section 106 regulations and determine how they might be updated to address modern needs and demands. He referenced the Senate Committee on Energy and Natural Resources meeting in October 2025 on Section 106 and noted that general stakeholder discussions over the last several years identified a number of areas where improvements could be made.

Moreover, Vice Chairman Voyles noted the Administration’s directions to many agencies across the federal government to take decisive action toward streamlining their existing regulations with a particular eye toward the environmental permitting space. Vice Chairman Voyles pointed out that the Administration has been in place for a year, and it has been 22 years since these Section 106 regulations were last revised. He expressed that now is an opportune time to look at revisions and updates as the Section 106 regulations are important to a broad array of stakeholders and to the American public. He intends to work to improve and streamline them and ensure they are a reliably useful tool.

Vice Chairman Voyles said those who work in preservation deserve an opportunity to inform this effort. He opened the floor to hear the Members’ initial thoughts on how the regulations are working and how best to guide revision efforts moving forward. He asked Mr. Nelson to guide the Members in discussion.

Mr. Nelson reviewed the questions for the Members to consider contained in the Member Briefing Book:

- 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?
- Are there any portions of the Section 106 regulations that are difficult to interpret or have become perhaps unnecessary, ineffective, or ill-advised? If so, please identify 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?
- What additional information should the ACHP collect regarding the Section 106 process? The current regulations give us very little authority to collect information about the Section 106 process. If there should be some additions to our ability to do that, where should those be made?
- Are the Section 106 regulations, or any portions thereof, inconsistent with any current E.O.s or directives issued by the President? If so, how should we fix that?

He then reiterated a number of areas the Members should be encouraged to focus on, including defining the undertaking and establishing the area of potential effects; assessing indirect and cumulative effects; managing the scope of reviews for long linear projects with limited federal involvement; and managing timelines for review.

Vice Chairman Voyles then opened the floor for Member discussion.

Mr. Matt agreed there is opportunity for improvement of the Section 106 regulations. He provided some historical background on the inclusion of Indian Tribes in the NHPA and implementing regulations and highlighted that Tribes are in a position now to inform a more efficient and effective Section 106 process. He said any changes to Section 106 need to produce real changes in federal behaviors. Updates need to ensure that consultation with Tribes happens early enough to actually shape decisions and is conducted in a manner that respects Tribal sovereignty and the express rights that the Tribes hold under the NHPA. He noted that streamlining the Section 106 regulations should not be used to bypass input from Tribes, narrow protections for sacred sites, or allow harm as acceptable just because timelines are tight. He continued that the changes need to reinforce the obligation that federal agencies have to identify and consider properties of traditional religious and cultural importance to Tribes. Also, any changes made need to ensure that Indigenous Knowledge is treated as essential evidence in the Section 106 process, and Members must recognize how any changes to these regulations might impact Tribes. He said NATHPO supports this effort.

Ms. Raines said NCSHPO has already formed an internal working group of SHPOs, Deputy SHPOs, and SHPO staff who have expertise on this issue to discuss revisions to the Section 106 regulations.

The Permitting Council's Emily Domenech said, as the regulations are revised, she encourages the Council to think about ways to standardize processes and make it more consistent across agencies and project types so project developers can comply with the law and regulations and meet the needs of project developers, especially regarding implementation of projects in a predictable and timely manner.

Ann Walker with Preserve America Youth Summit said many project developers see the National Environmental Policy Act (NEPA) and Section 106 as one thing. She strongly recommended requesting comments from industry and asked the Council to consider encouraging local citizen and community input in the process as she believes they are best positioned to provide input on avoiding adverse effects.

Kristin Thomasgard with the Department of War (DOW) said DOW supports the effort to revise the Section 106 regulations, agreeing they need to be streamlined, to include a better definition of "no potential to cause effects," and to allow agencies to rely on previous Section 106 reviews for substantially similar projects.

The ACHP Foundation's John Fowler said the Section 106 regulations should be consistently applied government-wide and noted there are existing tools in the regulations to tailor the Section 106 process to specific cases or circumstances. He pointed out that the ACHP also has guidance and other interpretive documents that help guide the application of the Section 106 process. He emphasized the importance of discerning if the problem is the Section 106 regulations or how an agency carries out the process. He said other solutions might include investing in Section 106 training for federal agencies.

The National Trust for Historic Preservation's (NTHP) Carol Quillen said NTHP supports the effort to review the Section 106 regulations and would like to participate in the Council working group on the regulations, but NTHP would also like clarity on the problem the Council is attempting to solve, ideally involving a data-based review. She stated the Council should identify when consultation will occur and emphasized that effective consultation on their development will result in better regulations.

Mr. Gonzalez said most states, counties, cities, and Certified Local Governments do not have the resources or expertise to keep up with Section 106 reviews. He said the process needs to be streamlined, but the local neighborhood group trying to figure out the impact of a project should not be forgotten in the regulatory review process.

RePurpose Capital's Patrice Frey said RePurpose Capital supports the need to update and modernize preservation practices and policies, and this is an opportunity to streamline review in situations where a project is similar to other projects.

The National Alliance for Preservation Commissions' Stephanie Paul said local voices need to be heard in the regulatory review process and not cut out of the consultation process. She emphasized that local communities often know the project best and can be most helpful at the community level. She also mentioned that everyone involved in a project should work together to ensure a tighter timeline.

Mr. Fowler said Section 106 is an exemplar of federalism, and he believes this is a real opportunity for state and local governments, Tribal governments, non-profit groups, citizens, businesses, and stakeholders to have a voice and seat at table in federal decision making that impacts historic resources. He also suggested that ACHP staff should conduct consultation in person.

Michael Boos pointed out the current Section 106 regulations are relatively short at 25 pages; most other agency regulations take up hundreds of pages in the Code of Federal Regulations.

Mr. Matt said Tribes want predictability and noted there are a lot of great tools in the current Section 106 regulations. He said streamlining should not be about reducing regulatory requirements but bringing clarity into the process and stated that early, informed consultation means better-informed projects and allows the least amount of impact and greatest amount of predictability. He said relying on prior consultations would be great as long as there are proper documentation standards that captured the information so that future projects can rely on vetted and informed prior documentation.

Kyle Scherer said the process for Section 106 regulation revisions should include meaningful consultation and government-to-government consultation with Tribes.

Vice Chairman Voyles noted that this discussion will provide the basis for a productive path forward, working together. He said he would like the process of analyzing and updating the regulations to move forward deliberately and without delay. He called on Ms. Fanizzo to outline the next steps and give an overview of the regulatory process with the Office of Management and Budget (OMB) and Office of Information and Regulatory Affairs (OIRA).

Ms. Fanizzo said any rulemaking undertaken would be subject to the Administrative Procedure Act (APA). As such, there are specific requirements for public participation, such as providing adequate notice of a proposed rule, and allowing for meaningful opportunity to comment. She explained this is achieved in part through a *Federal Register* notice. Once adequate public notice is provided, the agency must provide interested persons with the opportunity to submit written data, views, or arguments in response. To meet these APA requirements, the ACHP will be working very closely with OMB and OIRA.

The ACHP is also subject to several executive orders that will influence and impact this effort:

- EO 12866 is the overarching executive order that creates the framework for significant federal regulations and requires the ACHP to submit a notice to the Unified Federal Agenda that the agency intends to take rulemaking action. It is not a commitment to any specific changes nor to any actual specific action, but it will put the public on notice that the process is starting. The Unified Federal Agenda is expected to be publicly released the week of February 16 (as of April 17, 2026, the Fall 2025 Unified Federal Agenda has not been publicly released by OIRA).

- EO 14192 is a deregulatory executive order, which requires tracking how a specific regulatory effort lines up with other regulatory efforts.
- EO 13175 requires consultation with Indian Tribes for certain actions that have Tribal implications. It is very likely that any effort to revise the Section 106 regulations would have an impact on Tribes, and the ACHP's implementation plan for EO 13175 identifies a Section 106 rulemaking action as triggering that executive order's requirements.

Ms. Fanizzo said the ACHP has a trust responsibility to Indian Tribes that must be fulfilled in this effort and she anticipates there will be a lot of discussion on timing, process, consultation opportunities, working with both Tribes and NHOs, as well as public outreach required under the APA. Additionally, she noted these efforts should also fulfill the ACHP's mission and best practice standards by engaging with the public and other stakeholders, including SHPOs, local governments, counties, and industry and project proponents.

Vice Chairman Voyles said updating the regulations will require a great amount of time and effort in between the Council's regular business meetings, so he intends to form an advisory group of Members to assist him and ACHP staff in advancing this effort. He noted the group will not act on behalf of the entire Council but will assist with analyzing information compiled by ACHP staff, advise on areas needing attention or adjustment, and develop draft recommendations for further discussion. He said he would regularly update Members and engage them through informational meetings outside of formal business meetings. The advisory group will be kept at the Member/designee level. However, anyone serving on the Council can provide input. He asked those interested in serving in the group to contact him or Mr. Nelson by February 20. He also asked Members to provide initial feedback on the regulations to him by February 27.

Ms. Fanizzo said any actual publication of a proposed rule would require a vote of the entire membership. The subcommittee has no voting or approval power as that is retained by the membership.

Vice Chairman Voyles said a vote would occur before any proposed regulation is sent to OMB for consideration and publication and said he will provide more information to the Council as the working group is constituted. He is looking forward to engaging with the Members in a very meaningful way moving forward with this effort.

Regulation Recissions

Vice Chairman Voyles said the Members voted in December 2025 in favor of moving forward with the process to rescind both the ACHP's NEPA regulations as well as those that implemented the Urban Development Action Grant (UDAG) program. Both of these regulations became outdated, unused, and unnecessary.

Ms. Fanizzo said the rescission of the UDAG regulations is a proposed rule. It will allow for a 30-day public comment period after which a final rule would be issued, pending a vote of the Council. The rescission of NEPA regulations will be an interim final rule and will be immediately effective.

Army Program Comment

Vice Chairman Voyles said that he, Mr. Nelson, Ms. Fanizzo, and Jaime Loichinger, ACHP's Director of the Office of Federal Agency Programs, met with Department of the Army (Army) leadership to discuss changes the Army made to its proposed Program Comment for Army Warfighting Readiness and Associated Infrastructure (Program Comment), during which Mr. Nelson provided additional recommendations. The Army agreed to the adjustments and a revised Program Comment was provided to the Members.

Ms. Loichinger summarized the changes and the staff recommendations that remain unresolved.

She noted the Army removed the introductory language in appendices A and B that indicated the lists of activities and properties in the Program Comment were not exhaustive, an important edit that places more sufficient boundaries on the category of undertakings subject to the Program Comment's terms. Ms. Loichinger also pointed out the Army removed language regarding termination of existing Section 106 agreements and alternate procedures. She noted the Army indicated prior to the Business Meeting that it intended to pursue termination of existing Section 106 agreements, while simultaneously recognizing that the Program Comment was not the appropriate place for such a notification. Language regarding the consolidation of the ACHP's existing Army housing program comments under the terms of this program comment was removed. Ms. Loichinger indicated that the Army added additional language confirming that identification, evaluation, and assessment efforts would be conducted by or supervised by those meeting the Secretary of Interior's Professional Qualification Standards. She also noted the Army added some clarifying language regarding the standards that it would use to assess adverse effects, and a section was added regarding the process for managing properties of significance to Tribes and Native Hawaiian Organizations.

Regarding situations where discoveries of historic properties may occur, Ms. Loichinger stated the Army added language to confirm the process by which it would consult with Tribes and or Native Hawaiian Organizations. The Army also added language that would require notification to the SHPO and the ACHP when a non-Tribally significant property was identified. Ms. Loichinger indicated that the Army also committed to conducting annual meetings for the duration of the Program Comment. The amendment provision of the Program Comment provides clarification that the membership would vote on amendments to the Program Comment after consulting with the Army's Federal Preservation Officer (FPO). Additionally, the Army removed language requiring the agreement of the Army FPO on those amendments.

Ms. Loichinger stated the Program Comment's amendment provision still allows the ACHP Chairman to expand the Program Comment's applicability to other military departments. Due to the expansive nature of the Program Comment, ACHP staff believes that such a broadening of scope should be considered by the full membership through the amendment process. Despite asking the Army to remove this provision, Ms. Loichinger noted that it remains in the version that was shared with Members the week before the Business Meeting. She said there is language within the Program Comment that appears to require the Army to follow the Program Comment's terms. However, as previously indicated during the membership information session provided by ACHP staff and conveyed to the Army directly, a program comment is an optional tool for Section 106 compliance. Ms. Loichinger said the Army can choose to require its usage by Army installations, but it would have to do so following its own internal processes. While the Army also included the notification process for discoveries to include the ACHP and SHPOs, Ms. Loichinger explained that such notification would occur after the discovery of potential adverse effects and also after any mitigation has already taken place. She noted that this precludes the ACHP's ability as well as the SHPO's ability to opine on potential solutions, including considering ways to minimize adverse effects on historic properties.

The Program Comment still relies on a definition of properties of traditional religious and cultural importance that includes the condition that Tribes and Native Hawaiian Organizations must preemptively identify such properties and disclose them and their specific geographic location to the Army. Doing so puts a significant burden on these parties and is inconsistent with the requirement for agencies to develop appropriate identification strategies in consultation with a Tribe or Native Hawaiian organization. It also emphasizes the need for a proactive identification effort prior to planning for these types of undertakings. While the Army has attempted to create boundaries for the category of undertakings subject to the Program Comment, it still allows installations to create additional lists of undertakings with no known adverse effects. It has the potential for including activities that are not currently included in the scope of the Program Comment or for which there may not be consensus regarding adverse effects.

On a related note, Ms. Loichinger noted that while the Army has chosen to focus on the military landscape as the effected historic property, such a decision eliminates consideration of other properties that might be located within Army installations or affected by Army warfighting activities that might have significance related to non-military parts of American history. If such non-military properties are not covered by this Program Comment, it's unclear how the Army would be able to account for them.

Finally, some other effects to historic properties, such as noise or visual effects, are removed from consideration for most actions with other effects such as neglect, removal, and transfer, lease, or sale of a property only assessed as adverse for certain property types that are identified within the Program Comment.

In general, while some parts of the Program Comment have been improved, Ms. Loichinger concluded that there remain questions about the identified historic properties and the range of effects to them. As a result, as currently written and submitted for membership action, the Program Comment may challenge the Council's ability to reasonably comment on how the Army would take into account the effects of the listed warfighting activities and maintenance actions on historic properties.

Ms. Raines asked the Council to decline to approve the proposed Army Program Comment. She said the Program Comment, as written, is still not acceptable, does not comply with ACHP's own regulations, and, in some instances, is in conflict with the law. She quoted from the Army's 2019 memo regarding its strategic agenda for Army National Historic Preservation Act improvement that stresses the Army has a tremendous stewardship obligation, but she said, in the Program Comment, the Army says it should be exempt from the NHPA as it relates to historic preservation. She said the Program Comment, as written, allows Army actions, on or off Army property, to proceed without meaningful consultation or mitigation, and she expressed concerns that the Program Comment could easily be expanded to other military branches.

Mr. Matt said NATHPO agreed with all of NCSHPO's points, but noted NATHPO is happy to see the Program Comment now includes information about how the Army intends to collaborate, coordinate, and consult with Indian Tribes. He worries, however, that the Program Comment attempts to impose on Tribes the responsibility of the federal agency in identifying and documenting sites of cultural significance to Tribes and does not address confidentiality for these sites. He also indicated Tribes were not given enough time to review the Army's changes to the Program Comment.

Mr. Matt then made a motion for Vice Chairman Voyles to request that the Army extend the Member review period for the Program Comment an additional 60 days. The motion was seconded by Mr. Gonzalez, who expressed concern about the qualification of Army staff reviewing historic preservation efforts, the inclusion in the Program Comment of only one annual meeting, and his discomfort with the Army removing "neglect" from the Program Comment. Vice Chairman Voyles recognized the motion and asked for Member discussion.

Ms. Fanizzo explained that the ACHP had 45 days, with an additional 15-day extension provided by the Army, to act on the Program Comment and that would expire on February 17. If the ACHP failed to act before then and the Army refused the extension, it would be taken as the ACHP declined to comment.

Ms. Quillen said NTHP would also like more time to review the Army's changes to the Program Comment and that it is in the best interest of the Administration, the President, and the Army that the Members come to consensus about the Program Comment so that it can be widely understood and supported.

Ms. Everson asked for additional information on whether the Members requesting an additional 60 days from the Army was an appropriate action, and if 30 days, or another timeframe, would be more workable.

Mr. Matt explained NATHPO's request of an additional 60 days would allow a 30-day lead for additional Tribal consultations with an additional 30-day comment period. He noted this is a standard practice and timeframe in Executive orders, as well as ACHP guidance and policies.

Mr. Nelson stated that with any extension, it is not certain that the ACHP would need to consult further with external sources. He said that if there is a 60-day extension, he would like to have an informal Member information meeting and noted the 60 days would end before the next Business Meeting, necessitating an unassembled vote, which would take about two weeks to conduct.

Marik String asked if there was someone from the Army who could respond to the suggestion that the Program Comment is an attempt to exempt the Army from the NHPA and even if it purports to exempt the agency from the law, can it actually have that legal effect under the law and the regulations?

Ms. Fanizzo said there are multiple options for the ACHP to tailor the Section 106 process in response to an agency request, and the ACHP has the authority under the NHPA to exempt activities if they meet certain very specific criteria, but the Army has not presented this as a request for an exemption.

Amy Borman, Deputy Assistant Secretary of the Army for Environment, Safety and Occupational Health, said the Army does not view program comments as an exemption of, or an exception to, the Section 106 process. The regulations allow for tools to be used to comply. She pointed out that program comments are one tool that can be used for Section 106 compliance, and the Army is exercising the tool that is already available to be able to comply with Section 106.

Mr. Boos asked if prior to the Business Meeting if the ACHP had asked the Army to extend the ACHP review deadline, and Mr. Nelson replied that the ACHP had not yet made a formal request for extension.

Ms. Frey pointed out the Program Comment does two interesting things. One is about building typologies and how they might help the ACHP in both consistent and speedier review of projects, and the second is tiering of cultural resources. She said other countries, such as the United Kingdom, tier cultural resources and that helps them in their decision-making process in terms of the kinds of interventions that may or may not be appropriate. She said while she might not draw the tiering lines exactly the way they are in the Program Comment, she thinks the Council should consider this.

Mayor Simison said he supports NATHPO's motion to request an extension. He noted that when he was on the Council previously, discussions took place on a different Army Program Comment, and he noted challenges with spending public money where the public does not benefit directly on historic preservation. He said there should be a distinction for the buildings that have community access and value on military bases.

Mr. Tahsuda emphasized the Members had limited time to review the substantial document, and unless an extension somehow impinges on the Army's process or decision-making schedule, additional time would give Members the chance to develop consensus.

Ms. Borman said she appreciated all the comments and feedback and agreed that additional time is needed for Member review. She offered a 45-day extension and said the Members could reach out to Dr. David Guldenzopf to provide additional detail on the Army's rationale and development of the Program Comment and why the Army believes using this particular tool helps them streamline the modernization of the Army.

Mr. Matt stated that while 45 days would be more burdensome on ACHP staff, NATHPO supported a request for a 45-day extension.

Ms. Everson then moved to amend NATHPO's motion to modify the request to the Army for additional review time from 60 days to 45 days, and this was seconded by Mr. Boos. The amendment was approved by the Members. Vice Chairman Voyles then called for a vote on the 45-day extension request, which was also approved by the Members. Vice Chairman Voyles said ACHP staff will follow up with the Department of War and the Army with the extension request and will inform Members of the results of those discussions.

Mr. Fowler asked how the effort to revise the Section 106 regulations might impact the Program Comment.

Vice Chairman Voyles said starting a regulatory process is not a defined action. He wants to ensure that the agencies and departments across the executive branch continue to implement the existing Sections 106 regulations.

Mapping Project Update

Vice Chairman Voyles said the ACHP received funding from the Permitting Council to develop digital tools that will assist planners in carrying out Section 106 reviews. Some adjustments have been made to the project since it was first introduced and discussed, and he expressed the importance of the Council supporting and contributing to this effort.

Mr. Nelson said the challenge to collect available data about historic properties while also protecting those properties is not new. He explained the ACHP provided recommendations on improving the availability of data as far back as the Preserve America Summit in 2006. In the past 20 years, the ACHP's partners in federal agencies and State and Tribal Historic Preservation Offices have made great strides in managing and making available the data shared with them about historic properties. He pointed out, however, project planners, federal agencies, and applicants still wish for that data to be more readily available, and to have it in more consistent and easily digestible terms. Mr. Nelson noted that prior to the wide use of artificial intelligence (AI), available tools were difficult, expensive, and time consuming to develop. With these tools now available, and with the support of the Administration and the Permitting Council, he said the ACHP can build a platform to start making that information available to those who need to plan and execute major infrastructure and other projects for the benefit of the American people.

Mr. Nelson also said a better way to access that data can also be built where it necessarily and appropriately lives with agencies, states and Tribes. The data is out there, and, as stewards of that information, the ACHP can find a way to both present and interpret it for project planners, and he noted the tool can be designed to protect data while helping users find appropriate contacts for historic properties.

Blythe Semmer, ACHP's Policy and Legislative Officer, then provided a presentation on the development of a cultural resources data platform (CRDP), which included modifications from a previous idea for a nationwide map of historic properties. The reimagined CRDP is responsive to Administration priorities regarding the use of technology, including AI, to create efficiencies in the permitting process. She noted that a goal of the CRDP is to make information about the location of previously identified historic properties much easier to access so that information is available early in project planning. Additionally, she noted that the CRDP will enable project planners to leverage that data to avoid conflicts with historic properties wherever possible, resulting in time and cost savings and improving the overall permitting process.

Dr. Semmer noted the CRDP is responsive to the Presidential Memorandum on Updating Permitting Technology for the 21st Century that came out in April 2025, as well as the Council on Environmental Quality's Permitting Technology Action Plan issued in May 2025. She explained that the ACHP, as a member of the Permitting Council and a participant in discussions regarding improvements to the permitting process governmentwide, generated its own action plan, which acknowledged the ACHP's responsibility to make internal processes more efficient using technology, and addressing the information needs that federal agencies confront in seeking and analyzing data about the locations of known historic properties when agencies and project proponents cite infrastructure projects subject to Section 106 reviews.

Rezaur Rahman, ACHP's Director of the Office of Information Technology, continued the presentation, saying the original idea was to build a centralized map of all cultural resource and historic site data, however the ACHP seized the opportunity to redevelop the idea as an AI-first CRDP, giving the ACHP the opportunity to significantly increase its utility. He said the key component to the CRDP is an agentic AI retrieval system, so the ACHP will not be the central holder of the information. The CRDP will use federal, state, and possibly Tribal systems to retrieve data as part of the early project planning process.

Mr. Rahman said part of the key functionality of accessing the information will be to provide a research function that will aggregate information, such as geospatial data or data about surveyed sites, and provide relevant information to project planners. ACHP staff also are expecting the CRDP to provide impact and visual simulation, so for a project proponent of infrastructure projects, such as highways, gas pipelines, or a data center, the CRDP could help determine the effects to a particular site and help a project proponent use route optimization to lower the impact of the project. He noted this is beneficial to project planners and the federal and state parties involved and also provides for protection of the cultural resources present at those sites.

Mr. Rahman said the infrastructure being developed is in a Federal Risk and Authorization Management Program (FedRAMP) from Google, and access to the information will be federated and unavailable to the public. The ACHP plans to establish data sharing agreements with an initial set of state and federal partners. While the CRDP involves automation, there is an allowance for human oversight and controls throughout. He said once they have sufficient data, a second phase would address areas that have not yet been surveyed for the presence of cultural resources.

Dr Semmer then said the potential benefits of the CRDP are that agencies and project proponents could target needed Section 106 identification work to the areas of greatest need earlier, conserving limited agency resources and being more targeted in planning, which could lead to better chances of avoiding adverse effects. She also pointed out that federal agencies and their project applicants could plan for consultation with greater certainty with the hope the CRDP potentially eliminates the friction points and inconsistency in large projects, with initial research access available through a single system as opposed to multiple locations.

Dr. Semmer said the first step in the CRDP development will be a data landscape survey to better understand what cultural resource data is available and in what form. The CRDP development team plans to reach out to key stakeholders to learn how they use the data, and then move to rapid development of a proof of concept, which will help the CRDP development team understand what the system might look like and serve as a tool for additional reaction from stakeholders. The CRDP development team plans to identify at least three partner entities, such as SHPOs, federal agencies, or others, to test how their data is accessed via the AI-enabled system, followed by additional testing to refine the CRDP's architecture. She noted the goal is to soft launch an initial version of the CRDP in roughly 15 months with public availability in approximately 18 months. Then, she noted, the ACHP will consider future expansion and inclusion of additional data layers to continue to enhance the utility of the platform. She said ACHP staff will keep Members updated through regular reports.

Ms. Raines said she hopes the ACHP has adequate expectations of where SHPOs are with their data systems and noted that NCSHPO plans to have the ACHP staff join their annual meeting on March 2 for a brainstorming session on this project.

Mr. Matt said he hopes it is clear that data provided by non-Tribal entities is not an endorsement of that data because Tribes are concerned data may be incorrect or incomplete. He said NATHPO wants to ensure this tool creates additional opportunities for meaningful consultation with Tribes to help avoid and minimize impacts, and he noted that some Tribes are developing advanced technology and could provide helpful insight on this project.

Dr. Semmer said she would share the slide presentation with Members.

Vice Chairman Voyles said in reflection of the Council organization discussion earlier, this project could be an opportunity for extensive Member engagement and could be considered for a subcommittee group.

No new business was discussed by the membership.

The next Business Meetings will take place June 3-4, 2026, and September 29-30, 2026.

The meeting adjourned around 12:00 p.m.