



## QUESTIONS AND ANSWERS ARMY ALTERNATE PROCEDURES TO SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT

### **Q: What are the Army Alternate Procedures?**

**A:** The Army Alternate Procedures (AAP) are streamlined procedures that installations use in lieu of the Section 106 regulations, 36 CFR Part 800. The AAP is designed to reduce project delays and costs by eliminating formal 36 CFR 800 project-by-project consultation.

### **Q: What are the advantages of the AAP over 36 CFR Part 800?**

**A:** The AAP streamlines compliance by eliminating the project-by-project review, required by 36 CFR Part 800, allowing for more flexibility, seamless project execution, significant cost avoidance and internal resolution of adverse effects. Even for adverse effects, case-by-case review is eliminated. In addition, the AAP includes automatic exemptions for certain undertakings and provides a mechanism for the designation of additional undertakings as categorical exclusions. Finally, through the internalized process, it is easier to complete year-end or out-of-cycle projects.

### **Q: How does the AAP work?**

**A:** The AAP uses a plan-based compliance process. The National Historic Preservation Act (NHPA) chapter of the Integrated Cultural Resources Management Plan (ICRMP) is extracted and used under the AAP. Installations consult with stakeholders on their plan and its standard operating procedures for historic properties, obtain certification from the Advisory Council on Historic Preservation, then operate internally for 5-years, following the SOPs.

### **Q: Is there a start-up cost?**

**A:** There may be an initial start-up investment in staff time to update and consult on the plan, but over the 5-year implementation

(over)

period, the AAP will save the installation a significant amount of time and money by internalizing operations and eliminating the formal project-by-project external review with State Historic Preservation Officers and other stakeholders.

**Q: How do I program for resources to use the AAP?**

**A: Resource requirements for the AAP are programmed in Environmental Program Requirement - Report under Conservation as a National Historic Preservation Act/Programmatic Agreement, Memorandum of Agreement project (NHPA/PAMA).**

**Q: Is there anyone who can help in implementation?**

**A: The Cultural Resources Branch of the U.S. Army Environmental Center (USAEC) is available to provide support on AAP implementation.**

(Contact Base Operations Support Division at 410-436-1200)

**Q: How do I get started?**

**A: The first step is for the Garrison Commander to send a letter through the appropriate IMA Region and IMA HQ to ASCIM, copying stakeholders, indicating that he or she is going to adopt the AAP in lieu of 36 CFR Part 800. The USAEC can provide installations on-site advice and information.**