



## SOCIETY FOR AMERICAN ARCHAEOLOGY

June 19, 2025

The Honorable Doug Burgum  
Secretary of the Interior  
Department of the Interior  
1849 C Street NW  
Washington, DC 20240

RE: DOI Regulatory Reform RFI  
Docket No. DOI-2025-0005

Dear Secretary Burgum,

The Society for American Archaeology (SAA) is pleased to present the following comments on the US Department of the Interior's (DOI) request for information in identifying existing regulations that can be modified or repealed.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With nearly 6,000 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

The SAA appreciates the Department's efforts to "ensure that DOI administrative actions do not undermine the national interest and that DOI achieves a meaningful reduction in regulatory burdens." Archaeologists, particularly those working through the Section 106 process, help facilitate efficient, timely, and effective compliance with the National Historic Preservation Act (NHPA), balancing project delivery with the avoidance or minimization of damage to irreplaceable archaeological sites. We also understand that the DOI must comply with recent Executive Orders that seek to bring relief from overly complex and potentially excessive regulatory regimes. Nevertheless, the SAA wants to emphasize that the DOI and its regulations must continue to meet the statutory obligations imposed by Congress. In addition, the Department must have the necessary staff and other resources necessary to carry out this mission. The reality is that nearly all of the inefficiencies encountered by regulatory compliance when it comes to the NHPA are the result of a lack of sufficient staff and resources to implement the

rules. Therefore, the following is a list of suggestions that the SAA believes could be used to benefit the DOI, stakeholders, and the nation as a whole:

1. Increase funding for SHPOs and THPOs: the Historic Preservation Fund (HPF) provides crucial support to State Historic Preservation Offices (SHPOs) and Tribal Historic Preservation Offices (THPOs) and matching grants to nonprofits and local governments to preserve and document historic resources. The HPF (among other programs) provides funding to states, tribes, and local municipalities to identify their most important historic places so that federal agencies are aware of their presence when planning for a federal project or undertaking. SHPOs and THPOs remain the primary participants in the effort to preserve our American cultural heritage and assist local communities in promoting the rehabilitation and use of historic buildings and districts, ensuring that state and tribal rights are respected and resulting in job creation and economic growth at the local level. They are the experts on what constitutes a significant historical resource, and they continue to face substantial workload increases. Without them, the NHPA and its implementing regulations cannot function. Today's SHPO and THPO funding levels are insufficient to handle the increased workload. For instance, there are now 228 THPO offices, and the average THPO only receives approximately \$100,000 per year. The SAA recommends the DOI support \$70 million for SHPOs and \$34 million for THPOs in its next budget request.
2. Place greater emphasis upon tribal consultation: tribal consultation forms the backbone of the government-to-government relationship that exists between sovereign tribal nations and the federal government. All DOI regulations should include consultation provisions—such as those found in 25 CFR Part 1000 Subpart T—to ensure that the Department's activities bolster tribal nations' efforts to preserve their historic and cultural resources.
3. Expedite the federal Historic Preservation Tax Credit Program reviews: by allowing the states to complete the final tax credit reviews before submittal to the IRS, the DOI would expedite the process for developers, thus minimizing project costs and saving taxpayer money.
4. Make a one-time funding grant of \$28.6 million for heritage preservation technology advancement: preserving and managing our invaluable cultural resources is work that SAA members do every day with federal agencies under Section 106 of the NHPA and other statutes to locate, identify, and conserve historic and archaeological resources impacted by projects on federal land and for any federally sponsored undertaking. They use increasingly advanced technology to streamline management practices and compliance. The DOI can take advantage of new tools by promoting and funding technological applications to streamline resource management on federal land. To facilitate interoperable geographic information system platforms and file sharing programs between federal, state, and tribal systems, the DOI should implement funding—routed through the NPS Cultural Resources, Partnership, and Science Directorate in

conjunction with SHPOs and THPOs—to be used to develop databases, geographic information system platforms, and other technological efficiencies to facilitate communication and reduce response timelines. Up to \$250,000 will be made available to each SHPO, and up to \$60,000 for each THPO for technological enhancements and initiatives.

The SAA appreciates your time and consideration of these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Dore". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Christopher Dore  
President