

May 23, 2025

Hon. Doug Burgum
Secretary of the Interior
Department of the Interior
1849 C Street NW
Washington, DC 20240

RE: Impact of Federal Funding Delay on State and Tribal Historic Preservation Officers

Dear Secretary Burgum:

The undersigned organizations are writing to share our concerns about delays in fiscal 2025 federal funding support for state and Tribal historic preservation offices (S/THPOs). Delayed distribution of fiscal year 2025 funding has led offices to terminate staff positions and retract preservation project funding. It is impairing the ability of state governments to carry out federally mandated preservation responsibilities and fails to acknowledge the federal government's trust and fiduciary responsibility to Tribes.

The National Historic Preservation Act of 1966 established a national historic preservation program that operates as a partnership between federal, state, Tribal and local governments. This well-established partnership recognizes the federal government alone cannot and should not be responsible for identifying and evaluating nationally significant historic properties or to manage their restoration and rehabilitation without the close collaboration of state, Tribal, and local governments that are most familiar with a property's historic significance.

To fund this work, Congress established the Historic Preservation Fund (HPF) in 1976 to provide financial support for states, Tribes and local governments to do work mandated by the National Historic Preservation Act. These funds are used to review federal infrastructure and other projects (Section 106), historic tax credit rehabilitations, national register applications, and to maintain inventories of historic properties. In the case of State Historic Preservation Offices (SHPOs), in recognition of the partnership needed to uphold a national preservation program, states are required to match federal funding by a minimum of 40%, and to pass-through 10% to local governments. For Fiscal Year 2025, \$62 million has been appropriated for this purpose. Tribes also receive funds to perform the same functions on tribal lands, though a match is not necessary.

HPF funds are subsequently administered and awarded via formula grants to states and Tribes through the National Park Service (NPS). As a grant program, the NPS requires states and Tribes to apply for these funds on an annual basis. To date, however, the anticipated Notice of Funding Opportunity (NOFO), requiring that states and Tribes apply for federally-matched funding, has not been released.

As a result, more than seven months into the 2025 federal fiscal year, and more than 10 months into many states' and Tribes fiscal years, SHPOs and THPOs have yet to be granted access to the

federally approved funding they rely on to fulfill federally assigned duties. **The consequences of this delay are dire – one state has already terminated staff positions and several more are soon to follow. The loss of highly specialized staff is likely to severely hamper or cease SHPO's ability to fulfill their federally required duties, resulting in irreversible impacts to historic landmarks and cultural and archeological sites. Specifically, this means that Section 106 reviews (approximately 177,000/year), Historic Tax Credit reviews (about 1,000/year), National Register nominations, federal agency consultation and other duties will slow or simply grind to a halt.**

We respectfully ask you to proceed with awarding the funds Congress has appropriated and to immediately release the NOFO so that our national historic preservation program may continue to function, awarded preservation projects may proceed as planned, and our nation's heritage is not unnecessarily put at risk.

Sincerely,

National Conference of State Historic Preservation Officers
National Association of Tribal Historic Preservation Officers
National Trust for Historic Preservation
American Anthropological Association
American Cultural Resources Association
American Institute of Architects
Asian & Pacific Islander Americans in Historic Preservation
Association for Preservation Technology International
Coalition for Archaeological Synthesis
Historic Tax Credit Coalition
Main Street America
National Alliance of Preservation Commissions
National Preservation Partners Network
Preservation Action
Society for American Archaeology
Society for Historical Archaeology
World Heritage USA

cc: Office of Management and Budget