



Preserving America's Heritage

**REVIEW OF THE REGULATIONS IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT PURSUANT TO EXECUTIVE ORDER 13563  
“IMPROVING REGULATION AND REGULATORY REVIEW”**

**Analysis of Public Comments and Related Actions**

August 17, 2011

The Advisory Council on Historic Preservation (ACHP) sought public comment on the plan to review the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) pursuant to the requirements of Executive Order 13563, “Improving Regulation and Regulatory Review” (EO) from June 1–July 1, 2011. A total of 66 comments were received during this period. The following analysis provides an overview of responses received to nine questions offered for public comment along with specific measures the ACHP will take to improve the implementation of the Section 106 regulations.

*1. How should the ACHP periodically review its regulations to ensure they are serving their stated purpose efficiently and effectively? Please provide specific recommendations on appropriate outreach and timing.*

**Summary of Responses:** The majority of those who responded to this question acknowledged the utility of conducting periodic reviews of the Section 106 regulations consistent with the goals of EO 13563. Specific recommendations varied to some extent on the frequency of such reviews, ranging from annually to every 10 years; the process for conducting such a review, ranging from processes both less and more expansive than the one used in this instance; and the inclusion of appropriate stakeholders, ranging from Federal Preservation Officers alone to a full assortment of stakeholders including federal, state, tribal, and local officials; the public; industry; professional organizations; certified local governments, and others.

Most respondents acknowledged that electronic media, including e-mail, Web site postings, and social media such as Facebook and Twitter could be used to conduct such reviews, although some advised that electronic distribution alone would not be sufficient. Some also suggested that the ACHP use professional conferences and public meetings to gather feedback on the regulations. While many respondents generally confirmed the approach used in this review, some indicated that a 30-day opportunity for public comment was not long enough, and others commented on the need to better reach industry and applicants. Others suggested also that the ACHP’s request be accompanied by a straightforward and publically accessible summary of the Section 106 process for those members of the public unfamiliar with the details of the regulations.

On average, the comments supported the review of the regulations approximately every five years using primarily electronic means including e-mail, Web sites, and social media, and including outreach to a full range of stakeholders including federal, state, tribal and local governments; preservation organizations; professional organizations; industry; and the public.

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ACHP Action Plan: Consistent with ongoing requirements established by the Office of Information and Regulatory Affairs (OIRA) for compliance with Section 6 of the EO, the ACHP will do the following:

- A. At five year intervals determine whether the Section 106 regulations should be modified, streamlined, or expanded so as to make them more effective or less burdensome in achieving their regulatory objectives. Such an assessment should include soliciting public comment from federal, state, tribal, and local governments; preservation organizations; professional organizations; industry; and the public.
- B. This solicitation should be conducted through electronic means, including e-mail, Web sites and webinars, and social media, and include also appropriate opportunities for engaging stakeholders at annual and regional meetings, professional meetings, and conferences. Comments should be solicited for a period of no less than 30 days and preferably 60 days. As such, the next review of the Section 106 regulations would occur in 2016.

*2. How can the ACHP reduce burdens and maintain flexibility for participants in the Section 106 regulatory process in a way that will promote the protection of historic properties?*

Summary of Responses: Respondents provided a wealth of recommendations on how to reduce burdens and maintain flexibility while promoting the protection of historic properties. A significant number of respondents indicated that the regulations were not burdensome and already provide significant flexibility in designing tailored approaches to compliance. In fact, several respondents suggested that the regulations are too flexible and allow some parties to move through the process too quickly or without adequate consideration given to the importance of consultation and making appropriate decisions in the public interest.

Many respondents pointed toward the importance of the ACHP ensuring that federal agencies initiate Section 106 review early in the planning process to ensure that undertakings are developed and advanced with a full awareness of historic preservation requirements and the benefit of information about the presence and significance of historic properties to inform the planning process.

As with other questions, many respondents also recommended the use of program alternatives to expedite, simplify, focus, and tailor the Section 106 review process as conditions warrant it. While a number of respondents recommended also that the regulations be simplified and/or made easier to understand by laypeople and the public, few specific recommendations for making the regulations simpler to understand and read were offered. Others suggested a companion guide, such as the ACHP's *Citizen's Guide*, be made more readily available to the public.

One respondent recommended a targeted regulatory amendment to remove § 800.3(c)(1) asserting that non-tribal members living on tribal lands were adequately represented by the THPO and should not have the option of inviting the applicable SHPO to enter consultation.

Respondents also advised that the most effective way for the ACHP to ensure that that the regulations are not burdensome is to increase the proficiency of its practitioners through training, education, and awareness. One respondent also recommended that the ACHP develop a database of consulting parties and their areas of interest throughout the country. Several respondents also emphasized the critical role the ACHP plays in educating and assisting State Historic Preservation Officers (SHPOs) and Tribal Historic Preservation Officers (THPOs) in the requirements of Section 106, providing tools to these and other practitioners that improve the Section 106 review process, and providing leadership in the management of information developed in support of Section 106 decision making.

Several respondents also recommended streamlining measures to expedite or eliminate the review of no historic properties affected findings, including enhancing federal decision making authority in that regard, and mirroring efficiencies in the National Environmental Policy Act (NEPA) process at similar stages of review. Others recommended that the use of categorical exclusions in NEPA may provide a model for the development of additional exemptions of certain activities from Section 106 review.

ACHP Action Plan: While many respondents indicated they did not view the Section 106 regulations as burdensome, others provided recommendations on a broad array of actions the ACHP could take to improve their effectiveness and promote efficiencies in certain areas. A number of respondents recommended the regulations be revised to make them more publically accessible and reader friendly, while many others acknowledged that the regulations were necessarily detailed and to a certain extent complicated as a result of their need to address a broad array of federal activities and the need for diverse tools to address their impacts to historic properties.

The vast majority of recommendations for improving the Section 106 process can be achieved without regulatory amendments. Accordingly, the ACHP will continue progress in fulfilling commitments within the ACHP's current Strategic Plan as follows:

- A. Work with SHPOs, THPOs and Federal Preservation Officers (FPOs) to develop training opportunities that provide solutions to chronic Section 106 problems and which can be carried out independently by the ACHP or in partnership with SHPOs, THPOs, and FPOs.
- B. Work with the National Conference of State Historic Preservation Officers (NCSHPO) and the SHPOs to enhance their capabilities in carrying out Section 106.
- C. Finalize and distribute "Preparing Agreement Documents" guidance to encourage the inclusion of effective provisions for monitoring, amendments, sunset clauses, and dispute resolution language in final agreements.
- D. Develop guidance, in collaboration with stakeholders, on the appropriate use of conditional no adverse effect determinations as a measure for streamlining Section 106 review.
- E. Advise federal agencies on developing and implementing tailored historic preservation planning and review systems and programmatic approaches that advance preservation goals and promote efficient decision making, including identifying systemic federal agency compliance issues under Section 106 and developing plans for resolving them at the policy level.

*3. How can the process set forth in the Section 106 regulations better achieve positive preservation outcomes?*

Summary of Responses: Respondents provided a diverse set of recommendations on this question and demonstrated little consensus on the role of the ACHP in promoting "positive preservation outcomes" or the appropriateness of the ACHP focusing on outcomes at all. Many respondents acknowledged that the Section 106 regulations provide the best opportunity for stakeholders and the public to promote the preservation of historic properties of importance to them, while others suggested that the ACHP should ensure only that the process is followed, with little emphasis placed on measuring outcomes.

Several respondents advised that the best way to ensure positive outcomes is to promote the effective involvement in Section 106 consultation of consulting parties, particularly Indian tribes and Native Hawaiian organizations, and the public.

Many respondents also asserted that program alternatives, such as Programmatic Agreements, could be used to promote tailored and more effective approaches to protecting historic properties, while others asserted that Programmatic Agreements are often poorly monitored and their use weakens the protection of historic properties.

Several respondents also recommended that the most effective way to promote positive preservation outcomes is to train practitioners in the implementation of the process and increase awareness of the Section 106 process. Other respondents also advised the more appropriate standard for the ACHP to encourage is preservation outcomes that are in the public interest, recognizing that sometimes the preservation of a resource is not in the public interest.

Other commenters suggested that the use of a diverse toolkit, including electronic communication and the creative use of the Internet, to share information about appropriate mitigation measures and best practices would enhance the preservation of historic properties. Several other commenters also encouraged a national discussion about what types of historic properties are important and recommended further that Section 106 be tailored where appropriate to encourage focus on the protection of important historic properties and to reduce attention paid to activities that do not stand to identify and protect such places.

ACHP Action Plan: Question 3 elicited perhaps the strongest reaction in this review, bringing diverse opinions about the role of the ACHP to the forefront and dividing respondents among many positions. A common theme among these comments, however, was the importance of the ACHP providing oversight of the Section 106 process, ensuring that the public interest is served regarding the protection of historic properties, and ensuring that practitioners are adequately trained in how to carry out the Section 106 process.

The ACHP's efforts in promoting positive preservation outcomes in the public interest should rely in part on advancing the ACHP's training and education efforts, including the dissemination of information about Section 106 cases that demonstrate the appropriate treatment of historic properties in the public interest. Accordingly, the ACHP will continue progress in fulfilling commitments within the ACHP's current Strategic Plan as follows:

- A. Convert the current quarterly *Case Digest* to a broader and regularly updated Web-based report on Section 106 cases and other ACHP activities that is made available in electronic format to an expanded audience and collaborate with federal agencies to identify and highlight case studies and best management practices that have advanced Section 106 streamlining by the agency.
- B. Provide introductory and advanced instruction on the Section 106 process to practitioners via accessible onsite training in multiple locations across the country and develop and offer Section 106 training using distance learning strategies such as online training, webinars, and videoconferencing in order to reach a broader audience and target constituencies not fully served by the onsite training program, such as applicants for federal approval or assistance.
- C. Deliver two Section 106 seminars for Indian tribes via distance learning and develop downloadable training material and provide special Section 106 training for the Hawaii SHPO, Native Hawaiian organizations, agencies, and other stakeholders in Hawaii.

*4. How can the regulations be better harmonized with other federal environmental review procedures, such as the National Environmental Policy Act?*

Summary of Responses: While many respondents acknowledged that Section 106 compliance efforts were not always well coordinated with those steps taken to comply with the requirements of NEPA,

respondents were divided on the need for further guidance or encouragement on harmonizing the two, with the slight preponderance leaning toward a need for additional guidance. Recognizing that the Section 106 regulations do already speak to coordinating compliance with the requirements of NEPA, no recommendations for regulatory change were offered.

Many who recommended that further guidance be issued by the ACHP acknowledged that existing information within the Section 106 regulations, particularly at 36 CFR Part 800.8, was confusing and unclear. Many respondents further noted that the two compliance processes often get out of sync and that Section 106 compliance is begun well after the consideration of alternatives under NEPA is complete and offered suggestions on appropriate timing. Respondents also noted that this is also exacerbated by the fact that separate practitioners oversee the two processes and often fail to adequately coordinate. Many others acknowledged that there are frequent failures to initiate either process early enough, and that guidance on appropriate timing would be beneficial.

Some also acknowledged that potential coordination opportunities are lost given how little time Section 106 reviewers in State Historic Preservation Offices have to review NEPA documents. Another respondent made the same observation about the ACHP, recommending that its staff consider reviewing a broader sample of Environmental Impact Statements and other NEPA documents when it has the opportunity to influence effective coordination between the two on critical undertakings.

Several respondents also noted that earlier “Harmonizing” guidance developed in coordination with the Council on Environmental Quality was inadequate to address the difficulties many face in coordinating the two processes. Several respondents also recommended that additional training be developed on harmonizing compliance between the two requirements.

Those who recommended that no further action is necessary asserted that the two processes were relatively well understood and implemented effectively, while also doubting that additional guidance beyond what already exists in the regulations would be necessary or helpful.

Regarding other statutes, one respondent acknowledged the importance of coordinating compliance with Section 106, NEPA, the Archaeological Resource Protection Act, Native American Graves Protection and Repatriation Act, and the American Indian Religious Freedom Act, and several others acknowledged the importance of coordinating Section 106 and Section 4(f) compliance on transportation projects. No recommendations on amending the Section 106 regulations to achieve these outcomes were offered.

ACHP Action Plan: The comments offered in response to this question indicate significant concern about the current state of coordination between Section 106 and NEPA reviews. While some respondents suggested that the two processes work sufficiently well together, many others pointed toward challenges related to timing, coordination, and perceived failures to ensure that one process informs the other. Accordingly, the ACHP will take the following actions:

- A. Working with the Council on Environmental Quality and other federal agencies, complete guidance and begin developing case studies and best practices that promote NEPA coordination and substitution consistent with Section 800.8(c) of the ACHP’s regulations.
- B. Enhance the ACHP’s training curricula to incorporate revised material on coordinating and integrating Section 106 and NEPA consistent with the above.
- C. Collaborate with the Environmental Protection Agency in identifying appropriate NEPA documents for ACHP review and comment where the ACHP can promote coordination between NHPA and NEPA.

*5. How can the ACHP ensure that the Section 106 regulations are consistent with and coordinated effectively with other regulations promulgated by the National Park Service pursuant to the National Historic Preservation Act?*

Summary of Responses: While few respondents provided specific advice on how to ensure such coordination, several acknowledged that the goal of doing so was important and that additional consideration be given to how that might be achieved.

A number of respondents acknowledged the important role that the Keeper of the National Register plays in addressing questions and disputes regarding the eligibility of historic properties, which is one step in the Section 106 process. Still others acknowledged the special role the National Park Service (NPS) can play in consultation regarding potential affects to National Historic Landmarks (NHLs).

Some respondents suggested that the regulations and some bulletins (e.g. 38) implemented by NPS under the NHPA be reviewed pursuant to the EO as well, and one respondent also suggested that the ACHP review other regulations under NHPA and ensure that terminology is consistent among them all. Another respondent also tied the issue of the Secretary of the Interior's professional qualification standards to this question, recommending that the ACHP work with NPS to ensure they are updated. Finally, several respondents recommended more coordination between the ACHP and NPS' National Register Program.

A number of respondents also appeared to have interpreted the question as a request for feedback on NPS' efforts to comply with Section 106 and offered observations in that regard.

ACHP Action Plan: While no specific recommendations were made regarding the need to amend the Section 106 regulations or issue guidance to improve coordination, many respondents acknowledged the importance of ensuring that the ACHP and NPS coordinate effectively on the overall implementation of NHPA.

Accordingly, the ACHP will take the following actions:

- A. Convey to the NPS the recommendations made to update the Secretary of the Interior's qualification standards and certain bulletins.
- B. Promote the involvement of NPS and the ACHP in Section 106 reviews where a dispute regarding the eligibility of a property has occurred and where a National Historic Landmark may be affected by an undertaking.
- C. Promote awareness of joint guidance developed by the ACHP and NPS on the use of reports developed by the NPS pursuant to Section 213 of NHPA to support the effective consideration of impacts to NHLs and properties of national significance.
- D. Identify opportunities to support NPS' review of its regulations and the update of qualification standards and bulletins that intersect with Section 106.

*6. How can the ACHP ensure that information developed to support findings under the regulations is guided by objective scientific evidence?*

Summary of Responses: Many respondents indicated that the goal of ensuring the information gathered to support decision making through the Section 106 process was based on scientific evidence was neither appropriate nor applicable to the Section 106 regulation. The clear majority of respondents who addressed

this question asserted that much of the data gathered for Section 106 reviews was not and could not be based on scientific evidence nor should it be subject to any form of scientific review, since much of it is based on information about the human experience, tradition, cultural practice, and values that cannot and should not be subjected to such analysis.

Few respondents actually endorsed the idea of ensuring that such information be guided by objective scientific evidence; however, many did recommend that the ACHP ensure that the individuals gathering such information meet professional qualifications as established in the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. A subset of respondents also encouraged the ACHP to update the Secretary of the Interior's professional qualification standards. Another subset of respondents also requested that these standards be revised to recognize State Certified Real Estate Appraisers as qualified preservation professionals.

Several respondents also suggested that a sample of information gathered to meet regulatory requirements could be periodically reviewed by a panel or committee of individuals for the purpose of assessing it for scientific objectivity, and that this panel could also advise on appropriate measures for encouraging the use of objective scientific information to support Section 106 decisions.

In summary, most respondents advised that the ACHP should take no specific action to establish any requirement that information gathered to support Section 106 decisions be based on objective science.

#### ACHP Action Plan:

The ACHP will take no action to promote further consideration of the role of objective science in the Section 106 process. It will, however, convey a summary of comments on the Secretary of the Interior's professional qualifications to the National Park Service, which is responsible for managing these standards on behalf of the Secretary.

*7. Should performance metrics that demonstrate agency compliance and document Section 106 outcomes be developed? Please cite specific areas where metrics are needed.*

Summary of Responses: A slight preponderance of respondents advised the ACHP not to develop performance metrics for the Section 106 process. A significant number did, however, recommend that some metrics be developed and reported on, usually on an annual basis.

Many of those who advised against the development of performance metrics asserted that they would not be useful in measuring meaningful performance actions, would take significant time to develop and report, and add little value to the goals of NHPA. Others indicated that federal agencies already provide a form of performance data consistent with the requirements of Executive Order 13287, "Preserve America" and also provide annual data to the National Park Service and Secretary of the Interior regarding Section 106 reviews and archaeological properties, respectively.

Many of those who advised that performance measures be developed recommended that numbers of Section 106 actions and reviews, length of time needed to complete actions and reviews, numbers and types of various findings of effect, and numbers of historic properties impacted and avoided be measured. A number of commenters also advised that information, including an accounting of existing Programmatic Agreements and certain types of opinions, findings, and reviews be better tracked and made available to the public by the ACHP. A few commenters also recommended that the ACHP develop metrics to measure how effectively federal agencies are consulting Indian tribes.

ACHP Action Plan: The diverse comments provided on performance measures suggest that the ACHP should gather additional input from stakeholders on the value of performance measures and the effectiveness and efficiency of the Section 106 process.

It should be noted that many of the performance measures recommended by respondents are already in place and reported in the ACHP's annual budget justification to the Office of Management and Budget. Additional dissemination of those metrics may address that perceived need in part. Many other performance metrics proposed by respondents are also already gathered by the National Park Service in its annual survey of SHPOs and THPOs consistent with reporting requirements under the Historic Preservation Fund.

Accordingly, the ACHP will continue progress in fulfilling commitments within the ACHP's current Strategic Plan as follows:

- A. Develop a mechanism to gather data from federal agencies and periodically report on the adequacy and effectiveness of their preservation programs in carrying out the requirements of Section 106. Request information from federal agencies on existing Programmatic Agreements to assist in evaluating their effectiveness.
- B. Utilize ACHPConnect to track and report opinions, advice, and comments provided to federal agencies by the ACHP regarding their compliance with Section 106.
- C. Develop and implement performance measures to assess the overall effectiveness and efficiency of the Section 106 process and to survey practitioners' experience in complying with the requirements of the regulations.
- D. Utilize ACHPConnect to prepare summary reports that assess and measure the results of ACHP involvement in individual cases, including outcomes and time frames of reviews.

*8. Are there better ways to encourage public participation and an open exchange of views as part of Section 106 review? Please cite specific areas where improvements could be made and indicate what tools or mechanisms might be made available to achieve this goal.*

Summary of Responses: Many respondents acknowledged the importance of providing training and educational material to federal agencies on the requirements for and benefits of public participation in the Section 106 process, as well as the need to provide education and outreach to the public itself. Some asserted that these efforts are especially important given the vague and somewhat confusing nature of the regulations requirements for public involvement.

Several respondents commented also on the importance of federal agencies sharing information about their long range plans to allow the public a full awareness of their opportunities for involvement and the ability to weigh in on federal decision making earlier in the process where there remains greater flexibility for adjusting plans.

Several respondents also advised that Indian tribes share a special government to government relationship with federal agencies and that federal agencies must respect this relationship and not relegate Indian tribes to the status of "the public."

Some respondents also asserted that the ACHP has not consistently supported granting consulting party status to individuals and entities that request it but are denied that status by federal agencies. Others

recommended that the ACHP provide further guidance to federal agencies on the criteria for considering such requests and the benefits of granting that status in Section 106 consultation.

Several respondents also noted that the ACHP could be more effective in promoting the open exchange of ideas in Section 106 consultation if ACHP staff is trained in Alternative Dispute Resolution. Other respondents also recommended that the ACHP further promote the use of professional facilitators in consultation meetings where significant controversy or disagreement may stand to disrupt the consultation process.

Finally, several respondents recommended that the ACHP promote the use of the Internet and other tools and technologies to open consultation to those who cannot attend meetings directly or who would benefit from information provided outside the context of consultation meetings.

ACHP Action Plan: Respondents provided a broad array of ideas and suggestions for improving public involvement in Section 106 consultation and promoting the exchange of ideas. Many of the ACHP's current efforts to provide additional guidance on public involvement, including the recent publication of a revised *Citizen's Guide* and other tools currently in development, stand to resolve many of these issues. While specific regulatory amendments are not warranted to address these needs, a variety of guidance, tools, and technologies should be developed to improve opportunities for public involvement in the Section 106 process.

Accordingly, the ACHP will continue progress in fulfilling commitments within the ACHP's current Strategic Plan as follows:

- A. Develop guidance for federal agencies on incorporating the public in the development of Memoranda of Agreement and program alternatives under Section 106, including case studies and best practices.
- B. Collaborate with federal agencies to encourage the development of training and agency-specific guidance to address the importance of public outreach in agency activities and programs.
- C. Develop guidance, in collaboration with federal agencies and stakeholders, on appropriate measures for identifying and inviting the participation of consulting parties in Section 106 reviews.
- D. Work with partners such as the National Trust to improve outreach to preservation audiences and the public, in order to increase understanding of Section 106 as a preservation tool and to publicize successful Section 106 outcomes.
- E. Develop and deliver training for ACHP staff regarding Native Hawaiian organizations and Native American concerns as well as alternative dispute resolution.

*9. How else might the ACHP modify, clarify, or improve the regulations to reduce burdens and increase efficiency?*

Summary of Responses: Respondents provided a wide variety of other comments on and recommendations for improving the Section 106 process. A sampling of comments in this broad category includes the following:

- Tailor the Section 106 process to include procedures that are relevant to the varying types and nature of federal undertakings, from actions taken on federal property to the issuance of assistance, licenses, and permits and, in doing so, avoid treating all federal undertakings the same
- Develop list of standard exemptions from Section 106 review
- Develop an illustrated guide for Section 106 in non-technical terms
- Develop guidance on treating traditional cultural properties and traditional landscapes in the Section 106 process
- Develop greater efficiencies in the Section 106 review process when no historic properties will be affected
- Develop and share alternative mitigation examples
- Provide more specificity on what constitutes an undertaking and provide additional examples
- Involve the ACHP in more Section 106 cases
- Involve the ACHP in fewer Section 106 cases
- Provide further guidance on what constitutes a reasonable and good faith effort to identify historic properties
- Provide clarification of the process for consulting SHPOs and THPOs on findings of effect pursuant to § 800.5(c)
- Develop a contingency plan for facilitating Section 106 reviews when a SHPO does not or cannot participate in consultation
- Develop deadlines for federal agencies and tribes on the length of the review process to create certainty for private sector applicants
- Provide further guidance on defining and resolving indirect and cumulative effects
- Allow Indian tribes to fulfill some of the responsibilities of the Bureau of Indian Affairs when it does not have adequate staff capacity to perform them itself
- Issue and post opinion letters

ACHP Action Plan: Respondents provided a diverse set of recommendations on improving the Section 106 process. While many of these recommendations would not necessarily have the effect of reducing burdens or increasing efficiencies, many of them are germane to the goal of continuously improving the Section 106 process to enhance the ability of stakeholders to participate effectively and promote the consideration of historic properties in the development of federal undertakings.

While some of these recommendations may be outside the ACHP's purview and others may not, many of these recommendations represent reasonable improvements that can be achieved over time to adequately address the diverse needs of Section 106 stakeholders. It is the ACHP's everyday responsibility to seek improvements along these lines, and the ACHP will use these comments to inform work priorities over the coming months and years.

While the ACHP should not necessarily affect changes in all these areas, it will continue to pursue improvements including those already underway within the current performance cycle of the ACHP's current Strategic Plan in the following areas:

- A. Assist Section 106 practitioners by developing guidance, education, and training on treating traditional cultural properties and traditional landscapes in the Section 106 process.
- B. Share case studies and best practices on developing alternative mitigation strategies.

- C. Focus ACHP involvement in individual cases where potential outcomes warrant the investment of resources as specified in Appendix A of the regulations.
- D. Create and maintain an ACHP Web site repository for opinions, policy letters, and other forms of instruction.