

## **Public Comments**

### **Received in Response to a Request for Input on Strategic Directions For the ACHP during Strategic Planning**

**August 2019**

Thirteen comments were received. The public call for input was accompanied by a summary of ACHP accomplishments over the past eight years under the current Strategic Plan and a summary of initial discussions by the ACHP Members, taken from the minutes of the April 2019 ACHP Business meeting.



August 19, 2019

Druscilla J. Null  
Director, Office of Preservation Initiatives  
Advisory Council on Historic Preservation

Re: Development of a Strategic Plan for the Advisory Council on Historic Preservation

Dear Director Null,

The Coalition for American Heritage appreciates the opportunity to comment on the development of a new Strategic Plan for the Advisory Council on Historic Preservation (ACHP) under the Government Performance and Results Modernization Act. The ACHP is a critical element of the nation's historic preservation program and serves a vital role as an independent federal agency providing expert recommendations and guidance on the nation's most pressing and complex preservation challenges. As the ACHP has invited comments on strategic directions for the organization, these comments will focus on a few areas of historic preservation guidelines and regulations where we believe ACHP expertise and leadership is most critically needed.

The Coalition for American Heritage (Coalition) is an advocacy coalition that protects and advances our nation's commitment to heritage preservation. Supported by the American Cultural Resources Association, the Society for Historical Archaeology, the American Anthropological Association, and the Society for American Archaeology, the Coalition collectively represents more than 350,000 cultural resource management professionals, academic archaeologists and anthropologists, and other subject-matter experts with an interest in historic preservation. Members of the Coalition participate in our national preservation program by documenting, evaluating, and nominating important places to the National Register of Historic Preservation, conducting research in accordance with the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA) when historic properties are impacted by federal projects, serving as stewards of historic places, and interpreting these places for the public.

Many of our comments prioritize topics that are especially relevant today as the preservation movement is facing significant environmental, technological, and societal changes. The ACHP should continue to showcase examples of best practices and the economic benefits of preservation, and support the development of digital databases that will allow us to address the major issues facing the discipline today. Many of these comments furthermore



emphasize issues that affect how the public sees preservation and the way preservation concerns emerge in consultation over planned development. Conveying the importance of preserving our American heritage to the public is essential, and must be a major focus for the ACHP and the discipline in general moving forward. The preservation community has improved in this regard, but much work remains to be done. We need to communicate in a manner that allows the public to understand and appreciate how the past informs the future.

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The next four years of ACHP leadership should address a few issues that create a reputational or perception risk for the national preservation program; adversely impact stakeholder engagement and responsiveness; or represent emerging questions regarding preservation best practices where ACHP guidance is needed.

### **The Strategic Plan Should Identify Ways in Which the ACHP Can Facilitate Development of Improved Digital Information About Cultural and Historic Resources**

Early avoidance of impacts and accurate project planning are essential to an efficient historic preservation program. The ACHP should support infrastructure project proponents by encouraging digitization of information about historic properties and access to maps that inform early siting decisions. The Coalition commends the ACHP for convening the ACHP Digital Information Taskforce, established to develop geographic information systems (GIS) and other digital tools that provide cultural resource information to planners, CRM professionals, industries, and federal agencies engaged in planning.

To be effective, the objectives of the Digitization Taskforce must include spearheading agency and legislative solutions and must be prioritized in the new Strategic Plan. We further believe that the limited and disjointed condition of digital cultural resource data currently represents an ever-increasing risk to the national preservation program, as industries and other subject disciplines conduct their operations in information-management systems. If cultural resource data are not mapped in these systems, they will not be considered in project planning.

### **The ACHP Should Advocate for Agency and Congressional Solutions to the Problem of Appendix C**

Another topic that creates reputational risk and uncertainty for the national preservation program is the Army Corps of Engineers' (Corps) regulations governing how the Corps



addresses compliance with Section 106 of NHPA, laid out in in their regulations at 33 CFR 325, Appendix C. The legality of these regulations has been cast into doubt by a variety of experts and stakeholders, including the ACHP. Appendix C regulations encourage the Corps to take an extremely circumscribed view of their federal authority and determine areas for their permits in a counter-intuitive fashion that erodes public trust. As the nation saw with the Dakota Access pipeline dispute in 2014-2017, public objections to the outcomes of Appendix C can have a very damaging effect on tribes, local communities, agencies, and proponents of projects.

In 2019, the Government Accountability Office produced a report for Congress titled *Tribal Consultation: Additional Federal Actions Needed for Infrastructure Projects*, which closely assessed the current state of the Appendix C disputes between ACHP and the Corps. The report clearly states that Appendix C in its current form damages federal relationships with Indian tribes, and the GAO advocates for a legislative solution. It is the Coalition's view that these Appendix C disputes are likely to persist and increase, and that it is appropriate and necessary for the ACHP to explore ways in which the agency might convene experts to assess the impact of Appendix C on project predictability and historic properties. Over the next four years, the ACHP should work with the Corps, interested members of Congress, stakeholders, and other experts to brainstorm and create legislative solutions.

### **The ACHP Should Reevaluate its Approach to NEPA/NHPA Integration, Especially on Projects with Adverse Effects**

Developed by the ACHP and the Council on Environmental Quality, *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106*, is very useful in defining the workings of each process and their potential integration. NEPA and CRM practitioners alike are aware that public involvement is defined very differently by the two processes. Experience with integrating NEPA and Section 106 indicates that substituting NEPA for the Section 106 process is only efficient for undertakings with no effect or no adverse effect. More complex projects with determinations of adverse effect require the completion of the entire Section 106 process -- there are no shortcuts. The handbook in its current form fails to note these issues and does not provide a streamlined approach to projects with adverse effects. It is therefore recommended that the document be updated because substitution of the NEPA process for that of Section 106 is not always straight forward or necessarily more efficient.



## **The ACHP Should Expand its Relationships with Tribes and Continue to Advocate for their Roles as Stakeholders and Knowledge Holders**

The Coalition thanks the ACHP for stressing the importance of tribal consultation when proposing changes to the national preservation program with particular tribal impacts, such as the recent National Register of Historic Places (NRHP) proposed rule. American Indian tribes and native Hawaiian organizations are disproportionately affected by historic preservation legislation, because such a considerable proportion of sites important to tribes meet eligibility criteria under the NHPA. The ACHP should ensure that tribes are engaged early on in any regulator proposals; that tribal expertise is required for evaluation processes involving traditional or sacred resources; and that tribal consultation is not abridged or infringed. Conferring voting status for the NATHPO member on the ACHP is a critical first step, and the Coalition encourages the ACHP to examine its processes and structure to determine whether there are other expansions of tribal input in the ACHP leadership itself that may be appropriate.

We support Mr. Franklin's comments regarding the need for more tribal priorities in the upcoming strategic plan. The consultation process needs to be a two-way communication in which the tribes are able to provide recommendations regarding the management of resources and lands to the federal agencies. Such interaction is happening but it is not a widespread practice across federal agencies. Too often, Native American consultation is constrained by individual personnel within the federal agency. Finally, the documentation of ACHP accomplishments achieved under the previous Strategic Plan indicates extensive interaction with Native American tribes and Hawaiian organizations, federal agencies, cultural resource industry practitioners, infrastructure and energy development leaders, and federal agencies. The Coalition recommends that the ACHP prioritize increased interaction between tribal entities and project proponents to allow for better understanding of the process and consistency of practice among the several parties involved in a proposed project.

## **The ACHP Should Provide Expertise Regarding the Relationship of Environmental Sustainability to Historic Preservation**

Historic building renovation and restoration is often the most environmentally friendly and sustainable form of construction, and the conservation goals of environmentalism and the preservation movements often run parallel to each other. At the same time, the push to develop alternatives to fossil fuels and develop energy independence creates a pressure



point, and there are areas of tension. Current challenges in environmental sustainability and preservation include:

- Cumulative impacts of direct, indirect, and visual effects on historic properties by individual and largescale solar development, which is often unregulated.
- Tensions between offshore or terrestrial wind farm development and the historic properties or traditional cultural properties visually impacted by these developments.
- Risks of offshore energy developments to submerged paleolandscapes.
- Industrial historic properties that contain brownfield sites or other environmental contaminants.

The ACHP Success Stories include numerous examples of collaborative projects that solved both environmental and historic preservation challenges in their design. The Coalition believes that reducing our nation's carbon footprint is essential for all areas of American life, including reducing the effect of climate change on cultural resources. We ask that the ACHP consider and review these examples and prioritize ways in which environmental and historic resources review can be even better aligned.

### **The ACHP Should Conduct Research and Provide Guidance to Assess the Impact of Visual Effects on Historic Properties and Develop Best Practices**

Often related to the issue of energy development is the identification, assessment, and mitigation of visual effects of largescale energy projects and other developments on historic properties, including our cultural landscapes and National Landmarks. Over the last several years there has been uncertainty on the part of federal agencies regarding whether visual effects can be direct, what scale of visual effect should be considered an Adverse Effect, and how projects should analyze and assess these visual effects. In fact, assessment methodology for visual effects was one topic under review during the D.C. Circuit Court of Appeals' order to vacate the permit issued by the Army Corps for the Surry-Skiffes Creek transmission line. We believe these types of issues, including the question of what constitutes a good faith effort to assess visual effects and how agencies should make a determination of effect, will continue to be important in managing Section 106 review for such projects. The ACHP has a pivotal role in providing guidance on these issues.



## **The ACHP Should Convene a Taskforce on Traditional Cultural Landscapes and Visual Effects**

Recent contentious projects such as the debate over the eligibility of the Chu'itnu Traditional Cultural Landscape for the National Register have highlighted the political and theoretical complexity of large traditional cultural property designations. These properties are especially contentious because some industry groups challenge the legitimacy of Bulletin 38, the National Park Service (NPS) guidance document that explains how to evaluate traditional cultural properties (TCPs). In some cases, even when asked to consider properties as TCPs, federal agencies have demonstrated inconsistent or resistant attitudes towards considering properties that are eligible for reasons other than archaeological or architectural significance. Given the recent NPS process to update and revise Bulletin 38, we believe a critical role for the ACHP over the next several years is to interpret the meaning of the NHPA Section 101, related to the creation and maintenance of "a National Register of Historic Places composed of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, *and culture*" (emphasis added).

As demonstrated by several projects within the past few years, the concepts of cultural landscapes and visual effects have proven to be a challenge for developers, infrastructure development, energy development, regulators, and preservationists alike. Both concepts are important to local communities and Native American tribes; however, none of the involved parties have truly developed management practices related to these concepts that allow the efficient balancing of development needs and historic preservation. It is recommended that the ACHP develop a diverse task force, consisting of infrastructure and energy developers, Native Americans, cultural resource industry practitioners, historic landscape architects, and preservationists to address this issue. Diversity of the task force is essential to the development of practical recommendations. The focus of this task force would be to provide guidelines for the management of cultural landscapes and visual effects when development projects are proposed.

## **The ACHP Should Develop Best Practices and Guidelines Regarding the Use of Emerging Technologies to Record Historic Resources**

Recent decades have seen incredible improvements in technologies for recording historic structures, including 3D scanning, LIDAR (Light Detection and Ranging, a remote sensing method), photogrammetry, and exceptionally high-resolution photography. With these developments and a growing pressure on archives and state historic preservation offices to conserve space, there are a series of important considerations regarding file type



obsolescence, digital data degradation or loss, unstandardized file type or minimum resolution, and of the need for guidelines regarding how these products are allowed to be edited. Additionally, it is unclear the extent to which these methods could replace earlier methods or should be required on particular projects. Currently we have the capacity to create a complete 3D model of a given historic building scheduled for demolition, but it is unclear how often this level of work is conducted in practice. These are critical issues the historic preservation community will be grappling with for decades. The ACHP should consider convening experts and working with their colleagues at agencies and in the private sector to ensure that, unlike with digital data and GIS, the preservation field is not left playing catchup with regard to these technologies.

\* \* \*

These issues are not easily solved, which is why they require focus and energy from the ACHP in order to address them. We believe a focus on these big picture issues and pressing preservation challenges are the best use of the unique position and expertise of the ACHP over its next four years.

As you develop the Strategic Plan process, please reach out if the Coalition or its membership can be of any additional assistance. Thank you for the opportunity to comment.

Best regards,

A handwritten signature in blue ink that reads "Marion F. Werkheiser".

Marion F. Werkheiser  
Policy Director  
Coalition for American Heritage  
Phone: 703.489.6059  
[www.heritagecoalition.org](http://www.heritagecoalition.org)  
[info@heritagecoalition.org](mailto:info@heritagecoalition.org)



August 19, 2019

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ACRA is the national trade association supporting and promoting the common interests of cultural resource management firms. With the aim of delivering responsible solutions that balance development and preservation, our member firms undertake much of the legally mandated CRM studies and investigations in the United States. ACRA is a strong proponent of efficient environmental review to facilitate development while protecting our shared cultural heritage. Our members are consultants who support project proponents and federal agencies to comply with various federal permitting processes, including historic and cultural resources review under Section 106 of the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA).

ACRA suggests that the ACHP continue to showcase examples of best practices and the economic benefits of preservation, and support the development of digital databases that will allow us to address the major issues facing the discipline today. Many of ACRA's comments below emphasize issues that affect how the public sees preservation and the way preservation concerns emerge in consultation about planned development. Conveying the importance of preserving our American heritage to the public is essential, and must be

a major focus for the ACHP and the discipline in general moving forward. The preservation community has improved in this regard, but much work remains to be done. We need to communicate in a manner that allows the public to understand and appreciate how the past informs the future. The next four years of ACHP leadership should address a few issues that create a reputational or perception risk for the national preservation program; adversely impact stakeholder engagement and responsiveness; or represent emerging questions regarding preservation best practices where ACHP guidance is needed.

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To be effective, the objectives of the Digitization Taskforce must include spearheading agency and legislative solutions and must be prioritized in the new Strategic Plan. We further believe that the limited and disjointed condition of digital cultural resource data currently represents an ever-increasing risk to the national preservation program, as industries and other subject disciplines conduct their operations in information-management systems. If cultural resource data are not mapped in these systems, they will not be considered in project planning.

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<sup>1</sup> ACHP letter dated April 29, 2019 to Acting Associate Director of Cultural Resources, Partnerships, and Science at the National Park Service.

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These issues are not easily solved, which is why they require focus and energy from the ACHP in order to address them. We believe a focus on these big picture issues and pressing preservation challenges are the best use of the unique position and expertise of the ACHP over its next four years.

As you develop the Strategic Plan process, please reach out to ACRA if we can be of additional assistance. Thank you for the opportunity to comment.

Best regards,

A handwritten signature in black ink, appearing to read "Kim Redman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kimberly Redman  
President  
American Cultural Resources Association  
info@acra-crm.org  
202-367-9094

## *Emails Received*

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Mr. Franklin's suggestion about expanding ACHP training to include private consultants is a timely idea. Consultants play a larger role in the 106 process all the time, and they provide other preservation services that interface with NHPA. It only makes sense to offer training with consultants in mind. The IRS offers training for tax preparers and tax advisers, so there is ample precedent for this direction of training in the federal sector.

Mr. Franklin's comment may have been in specific regard to consultants who have been involved in Tribal consultations. The first rule for consultants is that they cannot consult with Tribes on behalf of a federal agency, and agencies cannot delegate that responsibility to a consultant. Other than that, there is no doubt that consultants, agencies, tribes, stakeholders, and the 106 process itself would all benefit from new training provided by ACHP.

I would like to see ACHP conduct surveys of consultants to gauge their training interests, and surveys of the agencies and tribes to suggest training needs for consultants.

David Siegel  
Cultural Resources Manager  
U.S. Fish & Wildlife Service - Southwest Region  
500 Gold Ave. SW  
Box 1306  
Albuquerque, NM 87103

505-248-7396

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Dear Mr. Fowler,

I do not have more time to review this right now, but these are my brief observations. How many actual THPOs want to drop their lives to go to Salish Kootenai? This is going to become a requirement now before a tribe can participate in the program?

“Next, Mr. Franklin suggested making the success of the ACHP and Salish Kootenai Tribal College partnership a priority. It has been a fruitful relationship thus far, and he would like to expand on it. The goal of that project is to train Tribal Historic Preservation Officers (THPOs) at a tribal college. As a part of that, there was a recommendation to include a Native youth in the committee. The previous day they had a presentation from Victor Lopez-Carmen, ACHP staffer Guy Lopez’s son, who recently edited a book *Global Indigenous Youth: Through Their Eyes*. He did worldwide research, interviewing and going to many different countries offering perspectives from Native youth or Indigenous youth.”

I for one do not. I have had one tribal member return home from there. The training was not specific to my region, we are still teaching this person, filling in the large gaps. They could have received the knowledge here locally at home without going across the country. There is one comprehensive archaeological track at a nearby college and many others that would suffice. The internship program has been wonderful though.

Amy Burnette  
Tribal Historic Preservation Officer and NAGPRA Coordinator  
Leech Lake Band of Ojibwe Division of Resource Management  
190 Sailstar Dr. NE  
Cass Lake, MN 56633

Office:  
(218) 335-2940

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26 July 2019

To Whom This May Concern;

Well may this be a lesson that when you solicit public comment, you can expect some public comment. So in any future strategic plan you guys at ACHP should please plan to do the following:

a) Develop within one (1) year a manual for how to address Section 106 terminations and if to decide whether to hold a public meeting and if so, how. Last December in Coupeville was a fiasco and clearly done on the run. The manual should be formulaic – like for instance consulting with the host city/town senior elected official whether to hold a hearing before deciding to and issuing a press release of a hearing, procedures for seeking security, procedures for a video record, and procedures for addressing disruptions. Too much was done seemingly in rapid response and before the next Section 106 termination is best because it's a matter of when and where, not if. Also make sure the manual is online - at the least for communities to serve as a resource for the locals as in a Section 106 termination the clock ticks fast please.

b) Provide constructive opportunities for concerned citizens who are not necessarily Section 106 concurring or consulting parties to constructively comment on topic. I suspect this is a big issue to those who work on Section 106 issues, not just those like I who comment on them. Feel this would be a big help as on NAS Whidbey's issues the base personnel got a lot of nongermane/off-topic comments.

Very thoughtfully yours;

Joe A. Kunzler  
growlernoise@gmail.com

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Hello Mr. Fowler,

Thank you for notifying the Rincon Band of development of a new ACHP Strategic Plan and for providing the Strategic Plan that was developed in 2011 and amended in 2014. We have reviewed the Plan and we are happy to see the various goals set out by the ACHP. We feel that of most urgency is Goal A, which involves the ACHP assisting the Executive Branch and Congress in formulating policies that fulfill the goals of the National Historic Preservation Act. As I'm sure you know, federal laws and regulation pertaining to cultural resources are vague in the description of what they protect, leaving interpretation open for agencies and developers. Stronger policies that require early tribal consultation are desperately needed. Currently Rincon is experiencing a vast of development in the surrounding area,

impacting several cultural resources and Traditional Cultural Properties. By the time the tribes get a chance to consult, land has already been bought, project plans developed, and cultural assessments conducted. After spending millions of dollars, developers are not willing to avoid cultural resources and TCPs, leaving fewer and fewer resources for future generations to enjoy. Establishing stronger policies that support early consultation is very much an urgency.

Rincon would be happy to participate in any efforts to create stronger policies for cultural preservation. In addition, we would like to participate in the reviewing/commenting of future draft Strategic Plans for the ACHP. We look forward to hearing from you and working with the ACHP.

Thanks,

Destiny Colocho, RPA  
Tribal Historic Preservation Officer  
Cultural Resource Department  
Rincon Band of Luiseño Indians  
1 West Tribal Road | Valley Center, CA 92082  
Office: 760-297-2635 | Cell: 760-705-7171  
Fax: 760-692-1498  
Email: [dcolocho@rincon-nsn.gov](mailto:dcolocho@rincon-nsn.gov)

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Dear ACHP -

Thank you for the opportunity to provide input for ACHP to consider in your upcoming strategic planning. Earlier this year, I worked with the LA SHPO and GSA (Ft. Worth) offices to place preservation covenants on the New Orleans Border Patrol Sector Headquarters, before it was sold.

I would be glad to discuss ways to strengthen both the "Historical and Cultural Preservation Covenants" document and process in order to provide future managers of the covenants a better chance at defending them.

Thank you for your time and consideration.  
Please let me know if you would like to discuss.

Sincerely,  
Brian M. Davis  
Louisiana Trust for Historic Preservation  
Executive Director  
318.267.5220  
LTHP.org

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Dear Advisory Council on Historic Preservation,

This concerns suggestions for the Council's Strategic Plan —announcement was sent about this by the California State Office of Preservation.

For the past 20 years I have worked with Cornell University in preserving 8 NHL planned communities during increased disasters/climate change conditions.

My suggestion for the Advisory Council's Strategic Plan is that we need to set national policies, specific guidelines, along with developing case studies in preserving our historic/ cultural resources during unstable environmental conditions.

We also need to set standards for professionals who work with historic/cultural resources—the Department of Interior guidelines for professionals need to be upgraded. In my work, I see countless examples of individuals who are doing preservation work and are not qualified. These limiting efforts compromise the significance of a historic site, and make it difficult to meet the challenges of preservation in a threatened environment that demands the highest professional expertise to protect our historic/cultural resources.

Thank you for this opportunity to present my ideas.

Dorothy Fue Wong

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Hello. Per your request on [achp.gov](http://achp.gov), here are two strident suggestions from the scientific, tribal, and consultant community:

1. Engage the NCSHPO and individual SHPO's on creating common data standards for historic properties Nationwide.
2. Engage the Army Corps of Engineers on aligning Appendix C with 36CFR800, and report back to the public on progress.

Tom

Tom Motsinger, President  
PaleoWest Archaeology  
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Thank you for requesting input on the Advisory Council on Historic Preservation's (ACHP) strategic plan required under the Government Performance and Results Modernization Act. I have three brief points to offer for member and staff consideration as this effort moves forward.

First, there are many excellent sources of ideas for strategic goals and priorities as ACHP members and staff consider a six-year plan update. Noteworthy examples include the 2018 triennial Section 3 report, the 2017 special report on improving tribal consultation in infrastructure projects, and the spring 2019 review of the ACHP's accomplishments under the current strategic plan. However, since it received substantial stakeholder input and comment from the preservation community I would also urge a particularly close look at the findings and recommendations contained in the 2017 report, *The National Historic Preservation Program at 50: Priorities and Recommendations for the Future*. Although the need or viability of some actions may have evolved since the report was prepared and issued, most of the report's recommendations remain valid and sorely needed. Some actions may need adjustment for 2020 and beyond, and not all of those actions would actively engage the ACHP, but many of them could or should.

Second, if this is not already underway, I would urge a parallel planning effort by the ACHP Foundation as a means to help support some of the ACHP's strategic efforts.

And third, while it may wind up being a more immediate and distinct action from the strategic planning effort, with Chairman Jorjani now in place I would strongly urge that an effort be made in the near future to have the White House name a Mayor (and a Governor as well) to the ACHP membership. These member slots have been vacant now for a number of years. In particular, having a mayor on the ACHP is important to provide a strong local government perspective when issues of housing, sustainability, and other public policies and legislation affecting localities are discussed. The current observer role for the National Alliance of Preservation Commissions (NAPC) is helpful, but I would argue that it is not the same as having an elected representative with ties to the U.S. Conference of Mayors and/or the National League of Cities speaking directly for those concerns. As the chairman of a city board appointed by the mayor and council of my community to provide advice on preserving our local history as well as the community's historic built environment, I see the need for such interaction and communication regularly as development projects proceed apace.

Thank you for the opportunity to provide this input, and I wish the ACHP and its new chairman well in your collective efforts.

Ronald D. Anzalone  
Chairman, Falls Church Historical Commission  
Falls Church, Virginia

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Dear Mr. Fowler,

We appreciate the opportunity to comment on strategic directions the ACHP might pursue as it carries out its duties as defined by the National Historic Preservation Act and related authorities, and we applaud the many accomplishments achieved during the current strategic plan. I write to encourage, in particular, advancement in the following arenas in the new strategic plan under development:

- Increasing congressional engagement in historic preservation activities
- Expanding the focus on preparedness and response to natural disasters (climate change)
- Supporting a comprehensive inventory with GPS information of our nation's historic preservation, archaeological, and cultural resources
- Promoting increased engagement by diverse constituencies, including America's youth
- Expanding programs to assist tribal entities in preservation efforts
- Creating a national marketing strategy that stresses the significant benefits – to both the public and private sectors – from investment in cultural and heritage resources
- Intensify social media strategies to engage the public in preservation efforts

Given the intersection of the mission and goals of the ACHP with those of the American Institute for Conservation and the Foundation for Advancement in Conservation, I would welcome the creation of collaborative projects with the ACHP to enhance our joint goals in any of the above referenced areas.

We thank you for all your diverse and impactful work in the field of historic preservation.

Sincerely,

Eryl

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Eryl P. Wentworth  
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Dru,

GSA proposes the following recommendation for a new strategic goal regarding federal agencies:

II. New Strategic Goal: Assist federal agencies meet their missions, schedules and budgets while completing compliance by streamlined methods for project efficiencies and through alternatives, which could come to fruition in an accelerated time frame and be widely available to all agencies, such as a national program comment for activities of negligible impact and public concern.

Beth L. Savage  
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John:

Thank you for the opportunity to provide comment as you develop the ACHP strategic plan. Having reviewed the initial discussions by ACHP membership, it is clear that your members have a broad vision for the type of work that the ACHP should undertake. While initiatives like Preserve America and the ACHP's youth engagement programs are beneficial, we hope that investment in these areas does not detract from what the MD SHPO sees as your core function and greatest value to us - your role as a leader in the Section 106 process.

We encourage ACHP to retain/augment the following actions in its strategic plan:

- Continue to provide a variety of training opportunities & resources (in person and online) to a targeted (agency specific, industry specific, consultant, applicant, and general public) as well as diversified audience.

- Provide/encourage collaborative training opportunities among agencies, SHPOs, tribes, and other 106 customers (on specific elements of the 106 process as well as general) so participants can benefit from the perspectives of the other parties.
- Provide clear guidance, FAQs, and updates regarding Program Comments, NPAs and other program alternatives to 106. Navigating these various agency and program alternatives can be very challenging for SHPO staff in the Section 106 trenches, particularly when the implementing agencies are unsure of process, etc.
- Continue to highlight success stories and best practices - seeing resolution of real time cases is very helpful.
- Provide further guidance and training for engaging consulting parties and the public - from an agency how to perspective as well as from a consulting party how to viewpoint. Too often both agencies and the public have the false assumption that SHPOs are in the driver's seat for consulting party involvement.

Again, thanks for the opportunity to comment.

Best regards,

Elizabeth

Elizabeth Hughes  
Director and State Historic Preservation Officer  
Maryland Historical Trust

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