

ADVISORY COUNCIL ON HISTORIC PRESERVATION BUDGET JUSTIFICATION FY 2022

April 2021

An independent federal agency, the ACHP promotes the preservation, enhancement, and sustainable use of our nation's diverse historic resources and advises the President and Congress on national historic preservation policy. It also provides a forum for influencing federal activities, programs, and policies that affect historic properties. The ACHP promotes historic preservation to foster the understanding of the nation's heritage and the contribution that historic preservation can make to contemporary communities and their economic and social well-being.

The position of chairman of the ACHP currently is vacant. The 24-member council is served by a professional staff with offices in Washington, D.C. For more information about the ACHP, contact:

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ADVISORY COUNCIL ON HISTORIC PRESERVATION BUDGET JUSTIFICATION, FY 2022

FY 2022 Request

The Advisory Council on Historic Preservation requests \$8,255,000 and 38 FTE

SUMMARY

FY 2022 Summary

The COVID-19 pandemic has had a significant impact on the work of the Advisory Council on Historic Preservation (ACHP), and the lessons learned greatly influence the ACHP's budget request for FY 2022. The ACHP will continue to stress its priority work while making important adjustments to address the substantial challenges facing the nation. In FY 2022, the ACHP will do the following:

- Manage the federal historic preservation review and consultation process under Section 106 of the National Historic Preservation Act (NHPA) in an effective and efficient manner that fully engages stakeholders and the public to find creative solutions that accommodate both federal project needs and stewardship of the nation's historic properties as the national economy recovers;
- Promote the availability and use of digital tools, including Geographic Information Systems (GIS) and electronic Section 106 processing (*e*106), to improve and expedite planning for federal projects by making information about the location of identified historic properties more uniformly and readily available to project planners and stakeholders, including those working remotely and unable to travel due to the pandemic, and to facilitate digital communication and recordkeeping in the Section 106 process;
- Promote historic preservation as a strategy for addressing national economic recovery goals, especially in the area of infrastructure;
- Respond to the rapidly growing demand from federal agencies for Section 106 program alternatives to tailor Section 106 procedures to specific agency programs and develop Section 106 program efficiencies; and support the use of such programmatic approaches as a permitting best practice per the Federal Permitting Improvement Steering Council (Permitting Council);
- Promote the effective engagement of Indian tribes and Native Hawaiian organizations (NHOs) in the federal preservation planning process and the broader national historic preservation program;
- Meet the substantially increased demand from federal agencies and stakeholders for online Section 106 training;
- Upgrade and expand the functionality and usability of the ACHP's website as a primary source of information on the ACHP and its programs as well as the federal historic preservation program in general;
- Promote federal policy consideration of the impact of climate change on historic properties and cultural landscapes, and encourage investment in preserving historic properties as part of federal climate resilience and adaptation initiatives;
- Expand the ACHP's work with partners, the White House Initiative on Historically Black Colleges and Universities (HBCUs), and HBCUs to bring students of color into the field of historic preservation in general and in career paths in the federal government;

- Work with partners to raise awareness about the importance of historic preservation; promote the value and relevance of cultural heritage and the benefits of historic preservation in contemporary society; educate and engage new audiences, including the next generation of preservationists; and strive to build a more inclusive preservation program that embraces all;
- Provide timely expert advice to the President, the Congress, and the executive branch on national economic, energy, community development, resource management, and environmental policies and priorities in relation to preservation of historic properties;
- Work with federal agencies to implement recommendations on managing historic federal properties in the ACHP's 2021 Report to the President on federal stewardship of historic properties, as required by Executive Order 13287, and the ACHP's 2021 report on leveraging federal historic buildings;
- Promote federal programs and policies that leverage the benefits of preserving and using historic buildings for community revitalization and economic growth, including addressing creation of affordable housing through rehabilitation of historic properties;
- Promote federal programs and policies that support training and apprenticeship opportunities addressing the shortage of skilled preservation craftspeople in the construction trades;
- Collaborate with the U.S. Semiquincentennial Commission and preservation partners to advance preservation programs and policies in the commemoration of the 250th anniversary of American independence;
- Implement Information Technology (IT) modernization and cybersecurity initiatives to support new telework-friendly work environments.

The ACHP's FY 2022 request represents an increase of \$855,000 from the FY 2021 level of \$7,400,000. This proposed increase will permit the ACHP to maintain the FY 2021 level of operations, meet many cybersecurity and IT needs, and address projected demands from federal agencies for Section 106 project reviews, program alternatives, and training and guidance, particularly in the areas of economic recovery and infrastructure development (including clean energy projects). It will support one additional FTE and enable the ACHP to fill an authorized but currently vacant FTE position.

FY 2022 Direction and Request

The unprecedented onset of the COVID-19 pandemic forced changes in ACHP operations almost overnight and presented challenges regarding internal work processes, communication, information sharing, and overall program management that had no parallel in ACHP history. Fortunately, IT investment in prior years and the existence of a well-established telework system for ACHP employees enabled the ACHP to transform to the new reality efficiently.

The pandemic and the federal response placed new demands on the Section 106 process to deal with essential emergency measures and longer-term efforts to rebuild the economy. Agencies came forward with requests for new program alternatives and expedited treatment of essential projects undergoing Section 106 review. The latter led agencies to seek assistance from the ACHP when they encountered state and tribal offices that had closed due to the pandemic. Two critical elements of the ACHP's response were to issue advice on carrying out Section 106 reviews when availability was constrained and to encourage the use of electronic tools to carry out these reviews, both areas where further development will be needed in FY 2022.

The demand for training increased greatly, coinciding with the inability to conduct on-site courses, which led to a substantial expansion of the ACHP's online course and webinar offerings. The impact in the ACHP's training strategy has been transformative, as the efficiency of the delivery process and the

receptivity of users have changed the fundamental direction of the training program, as is reflected in this request.

Experience during the pandemic has proven the importance of digital information and enhanced online processes for maintaining the flow of Section 106 work when participants cannot access paper files or conduct face-to-face meetings. The ACHP's Digital Information Task Force issued its report and recommendations prior to the impact of the pandemic and offered now prescient findings and recommendations on identifying the needs for future Section 106 management. Items are included in this request to promote the goals laid out in that report.

Meanwhile the broader efforts of the ACHP to promote historic preservation as a national policy and a means to achieving other governmental goals continue; although, many have been modified due to pandemic restrictions.

Economic recovery and infrastructure

Beyond the immediate response to the public health crisis, rebuilding the nation's economy is an overarching federal government priority. The ACHP's major contributions to this effort are to advance the Administration's infrastructure initiatives, including clean energy projects and programs. The agency is uniquely positioned to build efficiencies in the Section 106 review of federal and federally assisted projects and to improve environmental reviews for infrastructure projects through better coordination among the Section 106 process, the National Environmental Policy Act (NEPA), and other environmental statutes.

Since 2012, the ACHP has played an important role in Administration efforts on improving the delivery of infrastructure projects, providing policy recommendations and guidance as a member of the steering committee implementing the requirements of Executive Order 13604, "Improving Performance of Federal Permitting and Review of Infrastructure Projects," and more recently as a member of the Permitting Council established by Title 41 of the Fixing America's Surface Transportation Act of 2015 (FAST Act), and as a signatory to the April 2018 Memorandum of Understanding Implementing One Federal Decision under Executive Order 13807, "Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects." (Executive Order 13807 has since been revoked.)

The ACHP will continue to advance Permitting Council goals by developing Section 106 program efficiencies; promoting the full and effective engagement of key stakeholders, including Indian tribes, with an interest in the historic preservation implications of infrastructure development; further advancing the digitization of information to better inform Section 106 reviews and project planning; assisting federal agencies in effectively coordinating Section 106 reviews for infrastructure projects listed on the Permitting Dashboard; and promoting NEPA-Section 106 integration strategies. An important effort in the latter area will be working in cooperation with the Council on Environmental Quality (CEQ) to provide updated information relevant to the joint ACHP-CEQ *Handbook for Integrating NEPA and Section 106*.

The ACHP is also a member of the Broadband Workgroup, working with other federal members to identify further efficiencies and improvements to environmental review procedures for broadband projects, particularly those that serve rural America. The pandemic has driven home the critical importance of broadband accessibility for all Americans, and the ACHP is committed to expanding upon the already extensive range of program alternatives available for broadband development and improving the Section 106 process for such projects.

Section 106 program alternatives

Federal agency requests for program alternatives to adapt the Section 106 process to their specific needs have increased dramatically in FY 2020 and FY 2021, and are expected to continue to rise in the coming years. In supporting the goals of the FAST Act, the ACHP is actively advancing use of program alternatives to increase the efficiency and effectiveness of historic preservation reviews for a wide range of federal programs. They are particularly important tools for ensuring that review of infrastructure projects and clean energy projects can proceed expeditiously while still adequately addressing impacts to historic properties. Program alternatives provide the ACHP with the ability to tailor the standard Section 106 review process established in the ACHP's government-wide regulations to meet the needs of a particular agency program. They are established principally by and in collaboration with federal agencies and must include the engagement of key stakeholders and the public. Over the years, these have provided carefully crafted approaches to improving the efficiency of agency project delivery and focusing effort on more complex reviews.

Recent program alternatives developed by the ACHP include a Program Comment for the Department of the Army to establish procedures for the Army's management of its nationwide inventory of more than 3,200 Inter-War Era housing units that balance historic preservation requirements with the Army's responsibility to provide military families with safe and healthy housing. The ACHP also recently amended a Program Comment for broadband projects that eliminates duplicative reviews for other agencies that assist activities for which the Federal Communications Commission conducts a Section 106 review. These Program Comments are excellent examples of adapting Section 106 to focus on high-value work.

It is anticipated that the interest among federal agencies in developing program alternatives to create efficiencies will continue to grow in FY 2022 as it has during FY 2021. Nationwide efforts already in various stages of development and that will require further action by the ACHP in FY 2021 and FY 2022 include the following:

-Nationwide Programmatic Agreement for the Department of the Navy regarding the modernization of shipyards;

-A program alternative for the Bureau of Reclamation for water irrigation systems in the West; -Nationwide Programmatic Agreements for routine forest management activities and project phasing as well as a Program Comment regarding the disposal of facilities for the U.S. Forest Service;

-Updating the nationwide Programmatic Agreement for the Bureau of Land Management (BLM) that expires in 2023;

-Nationwide Programmatic Agreement for the United States Postal Service for emergency and common undertakings;

-Amendment of a Program Comment for Positive Train Control (PTC) systems extending the availability of its efficiencies to new rail construction implementing PTC systems over the next five years; and

-National Aeronautics and Space Administration proposed program alternative on management of highly technical and scientific facilities.

Other program alternative requests are expected in the coming years as well, as federal agencies recognize the efficiencies they provide, and all participants in the Section 106 process acknowledge their value in simplifying routine reviews. The ACHP is committed to collaborating with agencies to the extent that resources permit.

Digital historic property information and electronic Section 106 processing

Recognizing the importance of ensuring information about historic properties is readily available to project planners, the ACHP established a Digital Information Task Force in 2018. The <u>Task Force</u> recommendations and action plan, issued in 2020, address the need for more uniformly available digital tools, including GIS, to improve the efficiency and planning for federal projects by making information about the location of identified historic properties more readily available. Access to better information will contribute significantly to current government-wide efforts to improve the efficiency of environmental reviews, including Section 106 reviews, for infrastructure projects. Such information also can assist in the development of project plans that avoid adverse effects to known historic properties. In FY 2022, the ACHP will continue to advance the recommendations of the Task Force. The action plan includes working with state, tribal, and local governments, and private sector stakeholders to identify effective strategies for making historic property geospatial information appropriately available to the planning process and for the utilization of electronic Section 106 systems to facilitate workflows and information exchange.

Technology can also expedite the Section 106 process and make it more transparent and accessible to participants. Since 2013, the ACHP has offered an Electronic Section 106 Documentation Submittal System for use by federal agencies when carrying out their Section 106 responsibilities. The e106 system improves the efficiency of the Section 106 review process by providing federal agencies with an electronic submittal system that expedites critical steps in Section 106 review and encourages complete and accurate submissions. Almost all submissions to the ACHP are now received electronically, and e106 supported continuity of operations without delays during the pandemic's period of maximum telework. The FY 2022 request will enable the ACHP to significantly expand and develop upgrades to this system to fully integrate it with the ACHP's case management database and create a web-based form to improve usability. It will also position the ACHP to encourage and assist other key Section 106 participants, including federal agencies, states, Indian tribes, and NHOs, in developing similar tools and efficiencies.

Effective tribal engagement

An important component of the ACHP's infrastructure efforts has been improving the involvement of Indian tribes and NHOs in the Section 106 process, as large energy and infrastructure development projects impact traditional cultural properties on an unprecedented scale. These initiatives will advance Administration goals to improve environmental reviews of such projects.

The ACHP has taken numerous actions to encourage early coordination with Indian tribes by applicants and federal agencies in pre-application studies and information gathering. Earlier coordination often leads to better preservation outcomes and more expeditious and predictable Section 106 reviews. In 2019, the ACHP launched an e-learning course for federal agencies and applicants and issued a <u>handbook to assist</u> them with early tribal coordination. In FY 2020, the ACHP began offering Section 106 training for Indian tribes via Zoom and also developed an online, on-demand course for them. The ACHP launched a similar online course for NHOs. Ensuring that Indian tribes and NHOs fully understand the Section 106 process is a key component of their effective involvement in the review process. Training as well as the development of other tools to assist Indian tribes will continue and be expanded through FY 2022.

As a member of the White House Council on Native American Affairs (WHCNAA), the ACHP will again actively participate in and carry out necessary actions to support the work of the WHCNAA, both to advance the Administration's and the ACHP's tribal and Native Hawaiian program goals.

In 2019, in response to the United Nations Permanent Forum on Indigenous Issues focus on traditional knowledge, the ACHP began an initiative to work with Indian tribes and NHOs to

produce educational material and guidance regarding the role of traditional knowledge in the Section 106 process. The first product, an information paper, has just been completed and will be widely distributed in the preservation community. Work on formal guidance will continue into FY 2022 and will lead to training for federal and state officials, applicants, and the public in late FY 2022 or early FY 2023.

Training

Training is a critical component of improving the efficiency, timeliness, and success of the Section 106 process. In response to the pressures posed to all of America by the pandemic, the ACHP expanded and dramatically modified its training program in FY 2020 and FY 2021. While three new classroom courses were introduced to the curriculum in FY 2019 and FY 2020, the ACHP responded to the COVID-19 pandemic by converting them to a digital classroom format. The first two of these courses reached more than 150 students in the first two months they were offered during summer 2020. The digital classroom courses also support the ACHP's commitment to distance learning, recognizing that budget and travel restrictions in other agencies limit participants, although it does require up-front development costs. Introduced in FY 2013, the ACHP's webinars continue to grow in popularity with new courses introduced each year. In FY 2017, the ACHP launched its on-demand e-learning platform. In 2019, the ACHP removed fee requirements for all on-demand courses and saw a dramatic increase in the number of participants. On-demand e-learning courses have been accessed more than 3,000 times already in FY 2021. Given that on-demand e-learning courses are now reaching hundreds of new participants, the ACHP will focus further effort in expanding this catalog of material.

Total participation in all ACHP training formats is expected to reach a record 4,300 participants in FY 2021, and potentially even larger numbers in FY 2022. Additionally, there has been an increase in requests for special courses tailored to individual agencies, and the ACHP anticipates this to continue in FY 2022. Federal agencies support the development and delivery of these courses, but the ACHP creates course content and provides instruction. To respond to the increasing demand for training, the ACHP is seeking additional funding to upgrade the technology for delivering remote courses and webinars.

Website

The <u>ACHP's website</u> is its primary interface with the public and ACHP stakeholders. Completely overhauled in 2018, it is the platform for information about the ACHP's authorities, programs, and activities, providing a unique resource on the Section 106 process, a repository for essential guidance and best practices, a portal to the ACHP's *e*106 platform, and access to the ACHP's training and information products. The website has become increasingly used to promote the ACHP's social media efforts and is viewed by users as the gateway to information on the national historic preservation program.

An effective web presence requires constant refinement and upgrading to employ the latest technologies and adapt to market trends. Funding is requested to continue to maintain and expand the ACHP's website as an essential informational, public service, and public access vehicle to meet the increased need for online information and guidance. Recent experience with providing agencies and stakeholders with pandemic-related updates and guidance regarding their Section 106 compliance responsibilities has underscored the importance of an up-to-date, user-friendly website. The need to further improve the ACHP's *e*106 portal on the website underscores the need for the website to be expanded. In addition to the ACHP's website, the agency continues to expand its social media presence, making information available via Facebook, Twitter, LinkedIn, Instagram, and YouTube.

Enhancing equity and inclusion in preservation

The national historic preservation program is a public-private partnership intended to tell the stories of all Americans and to honor and preserve their heritage. In fulfillment of its statutory charge to encourage public interest and participation in historic preservation, the ACHP will continue its efforts to build a more inclusive preservation program and to engage youth in historic preservation. Much of the ACHP's recent work has focused on initiatives involving students of color to encourage them to pursue careers in preservation, in recognition of the current lack of diversity in the historic preservation field. These efforts will continue in FY 2022.

HBCU initiative. In 2018, the ACHP launched <u>Preservation in Practice</u> in conjunction with the National Park Service (NPS) and the National Trust for Historic Preservation. The initiative advances the goals of the White House Initiative on HBCU, which was created by Executive Order 13779, "White House Initiative to Promote Excellence and Innovation at Historically Black Colleges and Universities." Funded by NPS, the initiative strives to bring more young African American professionals into historic preservation and related fields. It introduces students to historic preservation principles and practice through work with preservation professionals and hands-on experiences at historic buildings at HBCUs, drawing on the rich heritage of these unique institutions, and provides networking and career building opportunities. In 2019, the ACHP's initiative was recognized by the White House Initiative with one of three Agency Innovator Awards.

The ACHP developed plans to expand Preservation in Practice from the current program with two HBCUs to three in 2020, and a broader audience of students following in 2021, but the pandemic forced deferral until 2022. Plans for FY 2022 are to continue to build out the program with the participation of additional HBCUs.

The ACHP's plan is to achieve similar relationships with other agencies, including ACHP member agencies. In FY 2022 and beyond, the ACHP will pursue partnerships and programs designed to engage students and faculty at Tribal Colleges and Universities, HBCUs, and Minority Serving Institutions, which will, among other goals, introduce participants to the range of job opportunities in the federal government. These programs support the Administration's desire to support colleges and universities that play unique and vital roles in their communities, including HBCUs and Minority Serving Institutions. As an ACHP member, the Department of Education is one of the agencies that the ACHP hopes to work with, in order to connect federal agencies more closely with community colleges that include students from diverse and under resourced communities.

The desire to create programs such as these, which are replicable and scalable, will allow other federal agencies to adopt similar programs and make them their own. A similar approach was taken in the past with the development of historic preservation youth summits, a program successfully adopted by a nonprofit organization with support from NPS. Plans for FY 2022 are to continue to build out the program with the participation of additional HBCUs.

Additionally the ACHP has created a webinar series, "Preserve the Past, Build the Future," for students of architecture, history, urban and regional planning, and other related fields, and for students at HBCUs and Minority Serving Institutions. The series focuses on engaging students, raising awareness of the intersection of historic preservation and their fields, and educating them on the wide range of job opportunities in the federal government.

The ACHP also has recently reached agreement with the Forest Service's Cultural Heritage Program to roll out the planning and implementation of a partnership program in FY 2022. It is designed to bring students from HBCUs and Tribal Colleges and Universities into the forestry, cultural heritage, and preservation fields, and make them aware of career opportunities at the Forest Service.

Tribal college initiative. The ACHP continues to make special efforts in Indian Country by hosting a Native youth Facebook page and implementing its partnership with Salish Kootenai College (SKC), the only tribal college or university with degree programs in tribal historic preservation. This work will continue in FY 2022 with increased emphasis on encouraging federal agencies to support career development in the preservation field, in particular to engage Native professionals in the national program. A federal-tribal summit at SKC to bring together tribal representatives, students, and agency staff to advance these goals was originally planned for FY 2020 and is now planned for FY 2022.

Policy advice

The ACHP continues to advise the Administration and the Congress on legislative, regulatory, and administrative policies that affect or enhance historic preservation interests. Likewise, it provides evaluations and recommendations on how federal programs can make better use of historic preservation tools and techniques as they carry out their missions. These efforts focus on strategies to effectively combine the stewardship of the nation's heritage with other national goals and cooperate in the joint development and implementation of such initiatives. In those efforts, the ACHP continues to work toward its established goal of supporting a preservation program that is inclusive and responsive to the public, expanding its use of social media to connect with an increasingly diverse and technologically sophisticated constituency.

Climate change and sustainability. In response to Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad," the ACHP is reaching out to policymakers in FY 2021 to promote consideration of historic properties when addressing key aspects of the Executive Order. For example, regarding the Administration's goal of conserving at least 30 percent of America's lands and waters by 2030, the ACHP has encouraged consideration of the benefits of conserving areas that contain not only important and strategic natural resources but also significant cultural resources. Likewise, regarding creation of a Civilian Climate Corps, the ACHP has urged addressing how such an initiative could assist in managing climate impacts on cultural resources. The ACHP also has encouraged consideration of the enefits of historic preservation and heritage tourism when prioritizing federal programs to support economic recovery in coal and power plant communities. Such engagement on climate change policy will continue and expand in FY 2021 and FY 2022.

The ACHP also will work with federal agencies to explore Section 106 program alternatives that could increase the efficiency and effectiveness of historic preservation reviews so as to accelerate the deployment of federal projects related to climate change. Among such projects are clean energy and transmission projects, building retrofitting, and projects that assist with community adaptation and resilience efforts.

Managing historic federal properties. The ACHP in late 2019 established a Leveraging Federal Historic Buildings Working Group to identify opportunities for reusing and leveraging federal historic buildings for both preservation and real property management efficiency benefits. The working group focused on the leasing of under-used and unused historic federal buildings and identified recommendations for administrative and policy improvements to facilitate the leasing of such properties for nonfederal use. The working group's report, *Leveraging Federal Historic Buildings*, published in April 2021, also offers best practices and success stories that can be shared with other agencies that are considering the disposal, lease, or reuse of historic buildings. Leasing that takes advantage of authorities under Section 111 of the NHPA is a central focus, as it enables agencies to lease historic properties that they own and retain the proceeds for historic preservation purposes. The ACHP will work with federal agencies to implement the report's recommendations in FY 2021 and FY 2022.

Reusing federal historic properties and leveraging partnerships with the public and private sectors also emerged as a key theme in the ACHP's 2021 report, <u>In a Spirit of Stewardship: A Report on Federal</u>

<u>*Historic Property Management.*</u> Pursuant to Section 3 of Executive Order 13287, "Preserve America," the ACHP delivered this triennial report to the White House on February 16, 2021. It describes federal agency progress in identifying, using, and protecting historic properties, and offers findings and recommendations for further enhancement of preservation efforts in relationship to properties owned or managed by the federal government. The ACHP will work with federal agencies to implement the report's recommendations in FY 2021 and FY 2022.

Affordable housing and community revitalization. Older and historic buildings are a critically important subset of naturally occurring affordable housing. In 2006, the ACHP issued its <u>"Policy Statement on Affordable Housing and Historic Preservation,"</u> which includes several principles that address the importance of flexibility and streamlining in Section 106 review of affordable housing projects. To ensure that this policy statement is fully addressing current challenges in the development of affordable housing, review and revision of the policy statement is planned in FY 2021 and FY 2022.

Related to this is the ACHP's work to promote historic preservation as a tool for community revitalization, economic development, and public education, supporting the Administration's goals in those areas. As the nation recovers from the economic impacts of the COVID-19 pandemic, historic preservation as a means of community renewal will be even more important. The ACHP has taken important steps in the past to promote preservation strategies in this area, making policy recommendations on historic preservation and community revitalization in its 2014 report *Managing Change: Preservation and Rightsizing in America* and issuing its follow-up 2016 "Policy Statement on Historic Preservation and Community Revitalization." This expertise will be useful in the ACHP's efforts to shape federal economic recovery efforts in the coming years.

Preservation trades training. In recent years recognition has grown of the nationwide shortage of skilled craftspeople to work on preservation projects. Enactment of the Great American Outdoors Act, which provides substantial multi-year investment in addressing deferred maintenance in national parks and forests and on the public lands, also creates a significant need to expand the pool of skilled preservation craftspeople to work on those projects. The ACHP began in FY 2020 exploring how federal policies and programs could support the training of skilled preservation tradespeople to address the issue and provide stable, well-paying jobs. The ACHP is uniquely positioned to work with members such as the Department of Education, other federal agencies such as the Departments of Labor and Commerce, and the private sector to advance the goal of economic opportunity while helping to preserve historic properties. In FY 2021, the ACHP issued its "Policy Statement on Promotion and Value of Traditional Trades Training." In FY 2021 and FY 2022, the ACHP will promote implementation of the policy statement's recommendations for federal action.

Preservation and the Semiquincentennial. The United States will commemorate 250 years since its founding in 2026, and the ACHP sees this as an opportunity to both celebrate the places associated with the nation's history and to make further strides in developing the national historic preservation program. In 2019, the ACHP engaged with the U.S. Semiquincentennial Commission as the Commission developed its report to the President, and in 2020 the Commission asked the ACHP chairman to serve on the America 250 Parks, Preservation, and Public Spaces Task Force. The ACHP is working to ensure historic preservation is an important component of the Commission's work. A particular goal of the ACHP, in its role as policy advisor to the President and Congress, is to seek permanent improvements to the public-private partnership that undergirds the national program. These efforts will continue in FY 2021 and intensify during FY 2022.

Information Technology and cybersecurity

IT has assumed an increasingly prominent role in the ACHP's work and requires continued investment to meet IT modernization and cybersecurity challenges to provide the necessary tools to carry out program

activities and serve its constituency securely and efficiently. Achieving this goal requires utilizing cuttingedge technology and replacing legacy infrastructure using modern cloud-based solutions where possible to enhance IT service effectiveness and reduce cybersecurity risks.

As noted previously, providing online access to information and technical assistance assumes increasing importance for improving Section 106 efficiency and trying to reach more diverse audiences in a cost-effective manner. The ACHP's online efforts, including its website, *e*106 system, e-communications, and social media platforms, provide many benefits for the public, federal partners, and the agency. The ACHP recognizes the importance of a broad range of strategies for communication and is aware that online communication and social media allow it to ensure transparency while increasing reach and reducing printing and distribution costs.

The increase in cybersecurity threats, the corresponding spate of legislative and Administration directives, and the need for replacing legacy equipment have placed significant financial demands on the ACHP. In response, the ACHP has undertaken a multi-year program to address the issues. Investments in FY 2020 and FY 2021 were essential to advance the effort but will not be sufficient to meet the challenges of the ever-changing threat environment and legal directives. FY 2022 funds will be allocated to meet existing requirements of the National Institute of Standards and Technology (NIST) Cybersecurity Framework areas and Executive Order 13800. The implementation of the new cybersecurity capabilities established in recent years resulted in measurable improvements in the ACHP's security posture as noted in the agency's Risk Management Assessments and Federal Information Security Management Act submissions.

Due to the investments made in cybersecurity improvements, ongoing improvements in the ACHP's Cybersecurity Risk Management Assessments have been made possible by prioritizing reduction of cybersecurity capability gaps. FY 2020 funding allowed substantial increases in cybersecurity capabilities, and the FY 2021 appropriation and the requested level of FY 2022 funding will enable the ACHP to maintain this momentum by providing sufficient resources to maintain effective cybersecurity operations.

All four Risk Management Assessment security domain ratings, "Identify," "Protect," "Respond," and "Recover," are being actively targeted for improvement in FY 2021 and FY 2022 to achieve "Managing Risk" ratings. Achieving these goals will be a multi-year effort. The goal is to improve the agency's cybersecurity capabilities, maintain the technology infrastructure, and make the necessary progress to improve the risk assessment ratings and reduce the agency's cybersecurity risks by fully implementing the NIST Cybersecurity Framework. FY 2022 funds will enable the ACHP to meet the goals; maintaining them will become recurring costs in FY 2023 and beyond.

By the end of 2020, the end of systems life cycles for networking, storage, computing, and some cybersecurity equipment were reached. This will ultimately require a significant investment to complete a one-for-one replacement of all the end of life equipment. The ACHP anticipates distributing these expenses over a multi-year period. Replacement activity for FY 2021 and FY 2022 will be focused on supporting critical infrastructure and cybersecurity continuity of operations. During FY 2021, the ACHP is also required to transition from the expiring Networx telecommunications contracts to the Enterprise Infrastructure Solutions contracts, requiring an increase in service and transition costs to improve agency connectivity, resiliency, and security. Some of these recurring cost increases will carry over into FY 2022 and FY 2023.

Requested FY 2022 funding levels will allow continuity of the following ongoing or newly established activities from FY 2021:

• Continue the cybersecurity automation capabilities and orchestration of security operations established in FY 2020. Significant work is being done to implement a Security Orchestration,

Automation, and Response (SOAR) platform to support the limited cybersecurity staff by automating higher tier security work and improve speed of triage, detection, and response. FY 2021 and continued FY 2022 funding levels will be used for platform licensing recurring costs. This cybersecurity function is essential to support the President's Management Agenda: Reduce Cybersecurity Risks to the Federal Mission by leveraging commercial and cutting-edge capabilities, enabling high returns on investment for cybersecurity. This initiative also supports the agenda for shifting from low-value to high-value work by using automation software.

- Continue maintenance but defer replacement of legacy equipment, including vulnerability mitigation for designated High Value Assets (HVAs) as required by Binding Operational Directive 18-02, Securing High Value Assets. This is a recurring requirement to mitigate operational risks by funding maintenance contracts, address equipment maintenance or capacity increase costs.
- Continue secure remote access to staff and to cloud productivity solutions. Legacy remote access equipment will be replaced with cloud-based secure access solutions.

FY 2022 Budget Request

The ACHP request for FY 2022 would maintain current level of operations, respond to increased demands for Section 106-related work, and address IT and cybersecurity needs. The total request is \$8,255,000, an increase of \$855,000 over the FY 2021 funding level.

Adjustments to base (+\$336,000). The sum of \$336,000 for salaries and benefits is requested to cover annualized government-wide pay raises and scheduled within-grade step increases. This would maintain the current staffing levels of the ACHP. Any other adjustments to base would be absorbed.

Personnel (+\$244,000). Changes to ACHP operations may result in the repurposing of certain existing positions to adapt to higher-priority functions. In addition, funding for two additional positions is sought¹:

- One FTE (GS-13) in the Office of Federal Agency Programs (OFAP), Digital Operations Coordinator, to coordinate use of electronic communication and digital information to enhance the timeliness and efficiency of Section 106 reviews. Key responsibilities would include coordination with the IT office to expand and improve the use of *e*106, which is rapidly becoming the primary interface between the ACHP and participants in Section 106 reviews; assist ACHP staff and Section 106 participants in improving their use of electronic communication to carry out Section 106 reviews, including interim measures to address challenges relating to COVID-19 and economic recovery; encourage the use of digital information and tools among other Section 106 participants, including federal agencies, states, Indian tribes and NHOs; oversee and improve OFAP's use of ACHPConnect (the Section 106 case management system) to monitor, document, and communicate about the ACHP's participation in individual Section 106 reviews; coordinate with the ACHP's Office of General Counsel to refine and implement OFAP's electronic records management protocols; and manage reporting and communication with members, stakeholders, and the public through the ACHP's website and other tools about the ACHP's activities under Section 106.
- One FTE (GS-11) in the Office of General Counsel to manage Freedom of Information Act (FOIA) requests, provide human resources support, and electronic records management. When the previous director of the Office of Administration retired in 2017, his position was downgraded, and human resource functions were assumed by the Office of General Counsel as an interim solution. For a

¹ There is currently one unfilled FTE position, so the request seeks only one additional FTE but funding for both positions.

short period, a part-time paralegal was hired to assist with FOIA responses. However the limitations imposed by the lower grade and temporary, part-time nature of the position meant that the general counsel and associate general counsel still needed to spend a substantial amount of time on human resources duties. Funds are now being sought to replicate and expand that position to assume responsibility for the human resources, FOIA, and electronic records management work from the higher-graded general counsel and associate general counsel. An FTE slot that has been vacant since January 2019 will be used for this position; no new FTE is sought.

IT and cybersecurity (+\$275,000). The following budget request items support the activities described in the preceding budget narrative.

- I. Modernization of public facing websites, digital services, and records management, and improvement of touchpoint areas for customer experience
 - A. Web content management system improvements, additional web development, media development, extending multimedia integrations and delivery systems for developing new website content, campaigns, capabilities, and ongoing development support would be provided. A dedicated web product would provide collaboration space for ACHP members.
 - B. End-to-end digitization of key services such as the Section 106 submission process by enhancing the *e*106 program by digitizing forms and implementing electronic signatures. Electronic signatures and forms would be utilized for efficiency gains in both internal processes and customer facing processes. Core agency application for managing Section 106 cases would be modernized to meet current needs. This would allow fully electronic *e*106 submissions.
 - C. Improve electronic records management and FOIA response processes through implementing dedicated systems.
- II. Information Technology
 - A. Cloud Email and Cloud Collaboration Tools: Cloud based telephony, video conferencing, and collaboration tools. Additional document workflow improvement costs covered under electronic signatures and forms digitization.
 - B. Enterprise Infrastructure Solutions (EIS). As part of the transition to EIS, connectivity redundancy and capacity increases (to support disaster recovery and continuity of operations) will be established.
 - C. Video Teleconferencing collaboration tools and technologies: Conference rooms would be upgraded to support web-based modern video collaboration tools, modernize existing A/V studio equipment to support training, webinars, and social media broadcasts. Includes upgrades to webinar room.
 - D. Equipment for remote working. Acquire remote working technologies to support teleworking and collaboration, implement mobile device management infrastructure.

Budgetary History

The FY 2021 appropriation for the ACHP was \$7,400,000. Figure 1 shows the recent funding background for comparison.

	FY 2019	FY 2020	FY 2021	FY 2022
President's Budget	6,440	7,000	7,400	8,255
Appropriation	6,890	7,378	7.400	
Budget Authority	6,890	7,378	7,400	
FTEs	37	37	37	38

Figure 1. Budgetary History, FY 2019-2022 (in thousands of dollars)

Budget Request

Figure 2. Appropriation and Authorization Language

Appropriation Language

ADVISORY COUNCIL ON HISTORIC PRESERVATION SALARIES AND EXPENSES

For necessary expenses of the Advisory Council on Historic Preservation (Public Law 89-665), [\$7,400,000*] \$8,255,000

* Consolidated Appropriations Act, 2021 [Public Law 116-260]

Authorization Language

There are authorized to be such amounts as may be necessary to carry out this title.

National Historic Preservation Act Amendments Act of 2006 [Public Law 109-453]

Evidence and Evaluation

To report on progress toward meeting requirements of the Foundations for Evidence-Based Policymaking Act of 2018 (Public Law 115-435), the ACHP has completed the required FY 2022 Evidence Template. It is attached as Appendix A.

PROGRAM STRUCTURE

Mission and Authorities

The ACHP was established by Title II of the NHPA (54 U.S.C. §300101 et seq.). The NHPA charges the ACHP with advising the President and the Congress on historic preservation matters and entrusts the ACHP with the unique mission of advancing historic preservation within the federal government and being a leader in the national historic preservation program. Since FY 2011, the ACHP has been guided by the following mission statement:

The Advisory Council on Historic Preservation promotes the preservation, enhancement, and sustainable use of our nation's diverse historic resources, and advises the President and the Congress on national historic preservation policy.

The ACHP's authority and responsibilities are principally derived from the NHPA. Under Section 106 of the NHPA, the ACHP reviews federal actions affecting historic properties to ensure historic preservation needs are balanced with federal project requirements. The ACHP achieves this balance through the Section 106 review process, which applies whenever a federal action has the potential to impact historic properties. Section 213 of the NHPA (54 U.S.C. §304110) authorizes the ACHP to issue government-wide regulations to implement Section 106. The regulations are found at 36 C.F.R. Part 800.

Other duties of the ACHP are detailed in Section 202 (54 U.S.C. §304102) and include the following:

- Advising the President and the Congress on matters relating to historic preservation;
- Encouraging public interest and participation in historic preservation;
- Recommending policy and tax studies as they affect historic preservation;
- Advising state and local governments on historic preservation legislation;
- Encouraging training and education in historic preservation;
- Reviewing federal policies and programs and recommending improvements; and
- Informing and educating others about the ACHP's activities.

The ACHP also derives authorities from other statutes and Executive Orders. For example, Title 41 of the FAST Act named the ACHP a statutory member of the Permitting Council charged with improving the federal permitting process for infrastructure projects. Section 7302 of the Omnibus Public Land Management Act of 2009 charged the ACHP with carrying out the Preserve America program. Executive Order 13287, "Preserve America," directs the ACHP to assess the state of federal stewardship of its historic properties and report to the President on a triennial basis.

ACHP Membership

The ACHP has 24 statutorily designated members, including the chairman who is a full-time Presidential appointee confirmed by the Senate. The ACHP also includes a number of observers who have been invited to participate in the work of the ACHP (See Figure 5).

Under the chairman's leadership, the ACHP members address policy issues, direct program initiatives, and make recommendations regarding historic preservation to the President, Congress, and heads of other federal agencies. Members pursue ACHP activities both collectively and individually. The membership is organized into four program committees: Federal Agency

Programs; Native American Affairs; Preservation Initiatives; and Communications, Education, and Outreach. Member task forces and work groups are also formed to pursue specific needs such as policy development or Section 106 improvements.

ACHP Staff

ACHP staff carries out the day-to-day work of the ACHP and provides all support services for ACHP members. In addition to its permanent staff, the ACHP maintains interagency liaison positions funded by the Federal Highway Administration (FHWA), BLM, General Services Administration (GSA), Department of Veterans Affairs (VA), NPS, Department of the Army, and Forest Service. The executive director supervises all staff components.

Function and FTEs	FY 2019	FY 2020	FY 2021	FY 2022
Chairman*	1	1	1	1
Executive Director	1	1	1	1
Office of Native American Affairs	3	3	3	3
Office of General Counsel	2	2	2	3
Office of Administration	4	4	4	4
Office of Information Technology	3	3	3	3
Office of Preservation Initiatives	3	3	3	2
Office of Federal Agency Programs	16	16	16	17
Office of Communications, Education, and Outreach	4	4	4	4
TOTAL	37	37	37	38

Figure 3. Staff	Organization	Actual and	Proposed.	FY 2019-2022
Figure 5. Starr	Organization	Actual and	Troposcu,	

The Chairman is appointed by the President and confirmed by the Senate.

The **Executive Director** has senior management responsibility for all staff organizational units and reports to the chairman.

The **Office of General Counsel** provides legal advice and analyses, reviews and manages FOIA requests, oversees the agency ethics program, and initiates the ACHP's human resources actions.

The **Office of Native American Affairs** advises the ACHP leadership, members, and staff on policy and program matters related to Native American issues, and offers technical assistance and outreach for tribal and NHO consultation under the Section 106 review process.

The **Office of Preservation Initiatives** analyzes legislation, develops policy recommendations, oversees special studies and reports, and implements programs related to national preservation benefits such as community development, economic impacts, sustainability, and tourism.

The **Office of Federal Agency Programs** participates in Section 106 reviews, develops and implements program improvement initiatives, provides technical assistance and guidance for

Section 106 users, and works to improve federal agency and stakeholder understanding of Section 106. It also oversees implementation of Section 3 of Executive Order 13287, "Preserve America," assists in carrying out the ACHP's responsibilities as a member of the Permitting Council, and manages the ACHP's training program, including delivery of onsite courses, webinars, and distance learning initiatives.

The **Office of Communications, Education, and Outreach** creates and conveys the ACHP's message to partners, stakeholders, and the general public via print and electronic media, manages the ACHP's website, meets information requests from citizens, handles media relations, takes the lead on engaging youth in historic preservation, and manages ACHP outreach, awards, and publications.

The **Office of Administration** oversees a full range of administrative, procurement, budget, and fiscal services and coordinates related services provided by the Department of the Interior and GSA on a reimbursable basis. The office also provides administrative and clerical support to ACHP leadership.

The **Office of Information Technology** manages the ACHP's IT services, including infrastructure and cybersecurity operations. The office operates the agency data center, cloud infrastructure, network, telecommunications, and cybersecurity technologies.

		FY 2020	FY 2021	FY 2022	
		Enacted	Enacted	Request	FY 2022 vs FY 2021
11/12	Salary/Benefits	5,587	5,587	6,167	+580
21	Travel	132	132	132	
22/23	Freight, Rent, Communications, Utilities	628	628	628	
24	Printing	4	4	4	
25	Contract Services	957	979	1,189	+210
26	Supplies	8	8	8	
31	Equipment	62	62	127	+65
	TOTAL	7,378	7,400	8,255	+855
	FTEs	37	37	38	+1

Figure 4. Expenditures by Object (in thousands of dollars)

Figure 5. Members, Advisory Council on Historic Preservation (April 2021)

Chairman Vacant

Vice Chairman Rick Gonzalez, AIA (Florida)

Expert Members Kristopher B. King (South Carolina) Luke A. Nichter, PhD (Ohio) Jay D. Vogt (South Dakota)

General Public Members John G. Finley (New York) Hon. John H. Frey (Connecticut) Jordan E. Tannenbaum (Virginia)

Native American Member Hon. Reno Keoni Franklin (Kashia Band of Pomo Indians, California)

Governor Vacant

Mayor Hon. Robert Simison (Meridian, Idaho)

Architect of the Capitol Hon. J. Brett Blanton

Secretary of Agriculture Hon. Tom Vilsack

Secretary of Defense Hon. Lloyd J. Austin III

Secretary of Education Hon. Miguel Cardona

Secretary of Homeland Security Hon. Alejandro Mayorkas

Secretary of Housing and Urban Development Hon. Marcia Fudge **Secretary of the Interior** Hon. Deb Haaland

Secretary of Transportation Hon. Pete Buttigieg

Secretary of Veterans Affairs Hon. Denis McDonough

Administrator, General Services Administration Katy Kale, Acting

Chair, National Trust for Historic Preservation Jay C. Clemens (California)

President, National Conference of State Historic Preservation Officers Ramona Bartos (North Carolina)

Board Chair, National Association of Tribal Historic Preservation Officers Shasta C. Gaughen, PhD (Pala Band of Mission Indians, California)

Observers:

Secretary of Energy Hon. Jennifer Granholm

Chairman, Council on Environmental Quality Hon. Brenda Mallory

Chair, National Alliance of Preservation Commissions Cory Kegerise (Pennsylvania)

Preserve America Youth Summit Director Ann Walker (Colorado)

President, ACHP Foundation Katherine Slick (Washington, DC)

Figure 6. ACHP Organizational Structure (April 2021)



APPENDIX A

FY 2022 ADVISORY COUNCIL ON HISTORIC PRESERVATION EVIDENCE SUBMISSION

Section 1. Agency Contributors to Evidence Submission

Rezaur Rahman, Chief Data Officer and Chief Information Officer, Office of Information Technology Ismail Ahmed, Administrative Officer, Office of Administration Druscilla Null, Director, Office of Preservation Initiatives Reid Nelson, Director, Office of Federal Agency Programs

Section 2. Evidence Act Implementation

(a) Agency Evaluation Policy (required for CFO Act agencies); and(b) Implementation of Program Evaluation Standards Outlined in OMB M-20-12

The ACHP is not a CFO Act agency and thus is not required to report on most aspects of the Foundations for Evidence-Based Policymaking Act. The ACHP does not routinely collect data on a large scale on either issues or individuals. That being said, the ACHP does collect data on the review of projects and programs under Section 106 of the NHPA. The agency also collects information on participants in ACHP-sponsored training on Section 106. The ACHP created a Digital Information Task Force to explore how improved access to digital tools could assist federal agencies, states, Indian tribes, and local communities in planning for federal projects and completing Section 106 reviews. In addition, the ACHP periodically collects data for analyzing federal policy, undertaking specific studies, and disseminating information on the agency's website. The ACHP is committed to the fundamental goals of the Foundations for Evidence-Based Policymaking Act to support evidence-based policymaking in the federal government while improving access to data, strengthening privacy protections, and ensuring the capacity to generate and use evidence.

(c) Barriers and Potential Solutions; and(d) Identification of Training Needs or Technical Support

The ACHP is making an initial investment to address data skills gaps through training and development in order to support development of valuable datasets for mission, service, and the public good.

Section 3. Implementation of the Foreign Aid Transparency and Accountability Act of 2016

The ACHP does not administer foreign assistance as defined in OMB Bulletin 12-01 and thus is not required to report.

APPENDIX B

INFORMATION TECHNOLOGY AND CYBERSECURITY

The ACHP is implementing guidance from NIST, OMB, and the DHS Cybersecurity and Infrastructure Security Agency (CISA) to manage the cybersecurity component of enterprise risk as directed in the Executive Order on Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure, consistent with OMB M-17-25 requirements.

FY 2021:

The ACHP does not have a dedicated staffed Security Operations Center. However, by effectively utilizing available funding and with the support of agency leadership the agency has established an effective cybersecurity operations program. In FY 2021, the agency was able to continue to operationalize cybersecurity tools, incorporate threat intelligence from CISA shared services, and start automating cybersecurity processes. Prioritization of a risk-based perspective was possible as base security operational capability and agency-wide visibility was already established.

Infrastructure Operations and Cybersecurity Operations Maturity Improvements:

Vulnerability and Asset Management: Daily scanning and vulnerability assessments, real-time network mapping, and exploit checking capabilities were implemented. Remediation is a manual process, which is currently being automated.

Threat Intelligence and Assessment: Real-time and retroactive checks of network traffic against Cyber Threat Iintelligence data feeds using both automated processes were implemented.

Security Monitoring: Fully operational collection and analysis of data feeds, logs, and alerts, and escalation of indications are done through combination of Security Information and Event Management (SIEM) and cloud security products on networks and endpoints.

Analysis and Detection: Automated threat analytics and detection on network traffic and endpoints was implemented. Threats are correlated to threat intelligence and rules, prioritized using threat scores. Manual analysis is performed on high score alerts for investigation and validation.

Incident Management and Response: Active incident management processes were put in place. Alerts are monitored throughout the day, seven days a week. Any potential incidents are monitored for mitigation before success. Any incidents are addressed within a couple of hours. Due to proactive monitoring, no successful major incidents have occurred.

Situational Awareness: Tactical understanding of situations was improved. Correlation to mission/business impact awareness is now available. Executive level support exists; however, not all processes and impacts are documented.

FY 2021 and FY 2022:

2021-2022 Infrastructure Operations and Cybersecurity Operations Maturity:

In FY 2021, high value improvements will be made in the cybersecurity operations capability areas with a focus on automation and addressing Executive Order 13800 requirements. The FY 2022 requested

funding levels will maintain new cybersecurity defense capabilities established in FY 2020 and FY 2021. Technologies and services to improve agency baseline cybersecurity capabilities will be continued.

The FY 2021 funding will be utilized to integrate and automate the different security platforms, which will be continued into FY 2022. Integrations will be done with the agency's SIEM platform; the automation platform will coalesce areas of vulnerability assessment, threat intelligence, analysis, detection, incident management and response. A continuous security instrumentation tool will also be implemented to verify security systems and controls. Having a centralized, integrated security events and automation platform will allow closing of security skills gaps, multiply security operation capacity, and automate investigative actions and remediation responses. Full integration and deployment of these capabilities will significantly improve enterprise-wide visibility and the agency's ability to effectively secure the infrastructure with limited security staff. All critical maintenance contracts for HVAs will be renewed to allow security updates to mitigate vulnerabilities. Automated patching will be implemented to reduce attack surfaces on-time.

Capabilities established for vulnerability and asset management, threat intelligence and assessment, security monitoring, analysis and detection, incident management and response will be continued through FY 2021 and FY 2022.

Ongoing cybersecurity capabilities being implemented in FY 2021 will be continued through FY 2022:

Cybersecurity automation capabilities implemented with the SOAR platform will be continued to support automating higher tier security work and improve speed of triage, detection, and response.

New cybersecurity capabilities for network traffic visibility on premise and in the cloud will be established.

New cybersecurity network technologies for adding additional network protection, redirection, and an early credible threat detection system will be implemented to provide high fidelity alerts for protecting all network assets and cloud systems.

New cybersecurity micro-segmentation capabilities will be operationalized for protecting on premise and cloud systems and HVAs in new remote work environments.

New cybersecurity security instrumentation tools will be operationalized for continuous monitoring of efficacy of security systems and controls.

New cybersecurity capabilities around the use of data analysis, machine learning, and artificial intelligence will be integrated to automate majority of security operations work.



ADVISORY COUNCIL ON HISTORIC PRESERVATION

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