



Preserving America's Heritage

ACTION PLAN TO SUPPORT SHPOS/THPOS

July 14, 2015

ACHP Action Plan:

A) The ACHP Chairman and Executive Director will:

- Continue encouraging the Administration to support full funding for the HPF and advise federal agencies on how they might educate their leadership about the importance of full funding;
- Work with NPS to raise further awareness among tribal leaders and others about the value of support for increased HPF funding;
- Continue to encourage the Administration's support for funding the development of a national inventory that is maintained by SHPOs and THPOs and which includes standardized information to inform Section 106 reviews;
- Share best practices/recommendations with Infrastructure Steering Committee, the White House Council on Native American Affairs, OMB, and Domestic Policy Council regarding federal agency support for SHPOs/THPOs and increased HPF funding.

B) ACHP Staff, in collaboration with NCSHPO and NATHPO will:

- Work with the NPS to determine what steps may be needed to further clarify the provisions within its Historic Preservation Fund Grants Manual regarding appropriate circumstances where SHPOs/THPOs might use additional funding streams to support their capacity to conduct Section 106 reviews;
- Provide information about existing authorities, such as Section 110(g) of the NHPA, that may be used in appropriate circumstances to provide resources (funding, liaisons, equipment, etc.) to SHPOs and THPOs assisting federal agencies with Section 106 reviews, and work with agencies to address and remove perceived impediments to providing such assistance that may exist within their own enabling legislation or other authorities;
- Share examples and case studies about the range of possible assistance and resources that federal agencies have provided to SHPOs/THPOs, including federally funded positions, liaisons, temporary assignments, data sharing, equipment, and travel support, and urge them to provide such assistance where appropriate;

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- Meet with FPOs to clarify how SHPOs/THPOs assist agencies in meeting their Section 106 obligations and identify program areas where SHPOs/THPOs need assistance and urge appropriate solutions;
- Revise and expand the ACHP's "Tribal Fees" Memorandum to encompass all organizations funded through the HPF (including SHPOs, THPOs, and CLGs) and to clarify which activities they perform in assisting federal agencies with Section 106 reviews that can and cannot be subject to fees assessed to federal agencies;
- Work with the FPOs, SHPOs/THPOs to identify further efficiencies in the Section 106 review process. This includes the use of program alternatives and exempted activities, to reduce review burdens for programs that have limited potential to affect historic properties so that available resources can be focused on those programs and projects that stand to cause greater effects to historic properties;
- In collaboration with NPS, clarify what does and does not constitute a "conflict of interest" regarding federal funding of SHPO and THPO positions, and recommend ways to avoid the appearance of conflicts of interest;
- Develop and deliver a webinar that clarifies the ACHP's position on federal agencies paying for the services of Indian tribes, Native Hawaiian organizations, THPOs, and SHPOs to perform historic preservation work on their behalf.