

**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

February 7, 2024

The Honorable Gene Dodaro  
Comptroller General of the United States  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20584

Dear Mr. Dodaro,

Preservation of our nation's historic and cultural resources—including buildings and neighborhoods that were the sites of significant historic events, as well as places that are sacred to Indigenous communities—is a central part of telling America's story. The places we protect reflect the country's values. Authorized by the National Historic Preservation Act of 1966 (NHPA), the National Register of Historic Places is an authoritative guide identifying the nation's cultural resources and indicating what properties should be considered for protection. The National Park Service manages the National Register, and State Historic Preservation Officers (SHPO) and Tribal Historic Preservation Officers (THPO) play a role in nominating sites to be included. In recent years, there has been an increasing concern related to equity and inclusion in the preservation community, with particular criticism directed at the National Register and the identification and designation process. As a result, many have started to examine how and whether the listings in the National Register tell and represent our nation's full story and, if not, what impediments exist that prevent it from doing so.

SHPOs and THPOs play critical roles in implementing the NHPA are often keepers of invaluable knowledge and expertise about important historic sites and cultural resources in their areas. SHPOs and THPOs have described a myriad of challenges in executing their duties, including difficulty in recruiting and retaining staff and insufficient resources. The National Park Service administers a grant program for SHPOs, THPOs, and certified local governments, which has been a critical resource for SHPOs and THPOs.

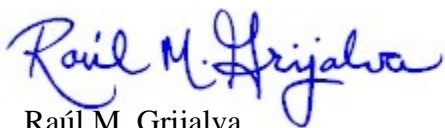
Significant and irreparable damage to historic sites and cultural resources occurs for many different reasons, including the construction of federally funded infrastructure projects. Section 106 of the NHPA helps ensure that agencies identify and examine potential effects on historic properties from proposed federal actions before they are approved. Some parties consider the section 106 process as too lengthy. The Advisory Council on Historic Preservation—the agency that promulgates regulations implementing section 106—is considering ways to streamline the process. In addition, many parties have also pursued statutory exemptions to section 106 for certain projects, leading to inconsistent standards being applied across projects.

In light of these various challenges, we are asking the U.S. Government Accountability Office (GAO) to conduct the following reviews related to historic and cultural preservation:

- A review examining the National Register of Historic Places. We request that GAO examine: (1) how the National Park Service administers and oversees the National Register; (2) the challenges that SHPOs and THPOs experience in the designation process; and (3) the changes, if any, that are needed to expand the criteria for inclusion on the National Register of Historic Places to better support more inclusive and representative preservation of historic places.
- A review examining challenges facing SHPOs and THPOs. We request that GAO examine: (1) changes that have occurred over time to the number of SHPOs and THPOs and the federal funding that supports them, including the National Historic Preservation Fund; (2) the challenges that SHPOs and THPOs face, including those related to recruiting and retaining staff, aging technology, and historic funding levels; (3) how these challenges affect SHPOs' and THPOs' ability to execute their responsibilities, including under section 106 of the National Historic Preservation Act, as amended; and (4) additional options that exist to support SHPOs and THPOs.
- A review of the implementation of section 106 of the National Historic Preservation Act as amended, with specific questions to be determined at a later date.

We appreciate your attention to this request and appreciate your assistance in examining these extremely important issues. If you have additional questions, please contact Qay-liwh Ammon or Brandon Bragato with the House Natural Resources Committee.

Sincerely,



Raúl M. Grijalva  
Ranking Member  
Committee on Natural Resources