

NCSHPO

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October 17, 2022

Hon. Charles (Chuck) Sams
Director, National Park Service
1849 C Street NW
Washington, DC 20240

VIA Email

RE: NPS Revision to Apportionment Formula for States

Dear Director Sams:

Recently, this past July, you announced an update to the apportionment formula used to award annual congressionally designated appropriations to states via the Historic Preservation Fund (HPF). We want to thank you and your staff for your efforts to examine this formula for funding so vitally relied upon by the national network of State Historic Preservation Officers (SHPOs) to fulfill their federally designated responsibilities outlined in the National Historic Preservation Act of 1966 and to provide a full suite of historic preservation services to our shared constituents – Americans of all backgrounds and interests.

Earlier this year, as your staff undertook this examination, I reached out on behalf of our membership to request that any changes be made effective in 2024 rather than 2023 to give states adequate time to adjust their budgets. Thank you, once again, for honoring that request.

At the time, we noted that because there could be no consultation between the NPS and SHPOs, per an internal decision by your legal team, we were understandably but regrettably not privy to the various aspects and potential outcomes being contemplated. We did, however, provide your staff with our own set of recommendations founded upon a year of internal consultation with our own members as well as members from the National Alliance of Preservation Commissions (NAPC) and representatives from Certified Local Governments (CLGs). We appreciate that our recommendations generally parallel what was included in your revised formula.

There is, however, one critical omission that is the reason for this letter – our request that any such formula adjustment be deferred until the HPF allocation to states increases to sufficiently prevent

any one state or territory from experiencing a loss of funding. By our calculations at the time, that funding level would be \$60 million – only three million more than the current allocation.

This position was one that was shared equally by states that we predicted would receive increases as well as those who would receive decreases. **It is based primarily upon a universal acknowledgment that NO state or territory currently receives, or has ever received, the amount necessary to run their programs to maximum potential.** To quantify this view, a September survey of the NCSHPO membership revealed that **98% of states and territories indicated support for this position**, representing both states and territories receiving HPF funding increases OR decreases.

Unfortunately, with this one recommendation not being included, we are in a position where although many states will see a much-needed increase, **23 states, representing 40% of the national network, will lose critical annual funding.** Two states in particular, New York and Pennsylvania, stand to lose \$140,000 and \$120,000 of their annual federal funding respectively, but because states are required to match these funds at a minimum of 40%, this decrease actually represents a loss of funding to the tune of \$196,000 and \$168,000. At a time when states are experiencing vast increases in their required project review portfolios due to massive federal infrastructure investments, struggling to retain and hire employees at salaries competitive with the marketplace, and striving to perform the increased survey and outreach necessary to make our federal historic preservation program accessible and helpful to all Americans, we believe that these cuts are especially inopportune.

Essentially these funding cuts mean that people will lose their jobs and livelihood at a time when their professional contributions are needed more than ever. For the impacted SHPOs, this unfortunate loss of funding adversely impacts their ability to meet increased constituent demands for services in many areas, including the growing requirements for project review, tax credit review, National Register nominations, Certified Local Government coordination and grant delivery, and increasing NPS subgrant administration requirements.

According to your staff, using this revised apportionment formula, the overall HPF funding level would need to reach \$62.075 million to erase the decreases. With the current appropriations level set at \$57.675 million and proposed FY 2023 spending levels of \$58 million and \$61 million by the House and Senate respectively, we feel reaching this funding need to fill the gap is not an unrealistic goal.

As such, we respectfully ask that you please delay implementation of this new formula until we reach a \$5 million increase in SHPO HPF appropriations to a level of \$62,075,000, unless the National Park Service can suggest other means to address and close this modest funding gap.

We do not make this request lightly. We certainly recognize the need for there to be an update to the formula and we support that overall goal. However, given the numerous challenges and great concern expressed by our membership who are facing an unprecedented increase in workload in

service to Americans nationwide, **we would very much appreciate your support to assure no office receives a decrease in funding at this time.**

We also would welcome the opportunity to meet with you to discuss the issue further or to answer any questions you may have.

Respectfully yours,



Erik M. Hein
Executive Director



Ramona M. Bartos
Board President

cc: Joy Beasley, Associate Director of Cultural Resources, Partnerships and Science