June 27, 2025

The Honorable Russell Vought
Director
Office of Management and Budget
Executive Office of the President
725 17th St NW
Washington, DC 20503

Dear Director Vought,

The undersigned organizations write to express deep concerns regarding the delay in the disbursement of fiscal year 2025 (FY 2025) Historic Preservation Fund (HPF) grants-in-aid to our nation's State Historic Preservation Offices (SHPOs) and Tribal Historic Preservation Offices (THPOs). These funds are of critical importance to those offices' ability to meet their statutory responsibilities under Section 106 of the National Historic Preservation Act (NHPA), as well as their delegated responsibilities of review under the federal historic tax credit program (HTC). Without the expedited release of funds, consequences will include increased inefficiencies and costs for federal projects, economic stagnation resulting from delayed federal project deliveries, and the loss of private sector jobs—all while unnecessarily placing our nation's historic and cultural heritage at risk.

Although appropriated by Congress and signed into law by the president in March 2025, the delay of these funds has prompted the elimination of SHPO and THPO staff. These crucial staff review federally funded and permitted projects, identify and protect historic and cultural places, and administer technical support benefiting countless communities. In Ohio, nearly one-third of the SHPO staff have been let go, increasing project review time from 24 days to 47. Nationally, the number of layoffs will continue to rise, and it is anticipated that SHPOs and THPOs will close entirely, jeopardizing billions in direct federal infrastructure investments unless the funds are immediately disbursed. Federal undertakings will not only be delayed and become more costly but will also likely result in negative, irreversible impacts on historic, cultural, and archeological sites.

Without HPF funding, HTC rehabilitation projects are at risk of slowing down or halting completely, hampering economic growth. In 2023 alone, the HTC projects reviewed and coordinated through SHPOs created 162,000 jobs and was responsible for $18.5 billion in economic output. In addition, Section 106 reviews generate a significant economic multiplier effect—private-sector firms and their employees carry out most of the Section 106 process. If the Section 106 system no longer functions, the industry will face significant layoffs, worsening delays in the delivery of federal projects.

Further, providing funding for THPOs to consult on projects with a federal nexus is a key duty of the federal government. Under law, Tribal Nations are not required to match the funding that they receive through the HPF for their THPOs—that support is a legally enforceable fiduciary obligation on the part of the United States to protect tribal treaty rights, lands, assets, and

resources. Failure to provide this funding for THPOs is a violation of the federal government's trust responsibility to Tribal Nations.

We urge you to facilitate the immediate release of the FY 2025 Notice of Funding Opportunity (NOFO), and the swift approval of applications necessary to draw down funds. Doing so will ensure that the work of SHPOs and THPOs continues to contribute to the nation's economic growth and will preserve the livelihoods of thousands of private-sector workers who directly benefit from the HPF. We also welcome the opportunity to meet with you to discuss the numerous benefits of the federal government's continued commitment to balancing preservation efforts at the national, state, and local levels, and the efficient delivery of federally funded and permitted projects, as originally envisioned in the NHPA.

Sincerely,

American Cultural Resources Association
National Association of Tribal Historic Preservation Officers
National Conference of State Historic Preservation Officers
National Trust for Historic Preservation
Preservation Action
Society for American Archaeology
Society for Historical Archaeology

CC: House Appropriations Committee
House Natural Resources Committee
Senate Appropriations Committee
Senate Energy and Natural Resources Committee