



**NATIONAL ASSOCIATION
OF TRIBAL HISTORIC
PRESERVATION OFFICERS**

P.O. BOX 19189
WASHINGTON, D.C. 20036-9189
(202) 628-8476
INFO@NATHPO.ORG
WWW.NATHPO.ORG

August 1, 2025

Mr. Adam Suess
Acting Assistant Secretary for Lands and Minerals Management
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Acting Assistant Secretary Suess,

The National Association of Tribal Historic Preservation Officers (NATHPO) has the following comments regarding the U.S. Department of Interior's (DOI) Abandoned Hardrock Mine Reclamation (AMHR) Program Tribal Grant.

NATHPO is the only national organization devoted to supporting Tribal historic preservation programs. Founded in 1998, NATHPO is a 501(c)(3) non-profit membership association of Tribal government officials who implement federal and Tribal preservation laws. NATHPO empowers Tribal preservation leaders protecting culturally important places that perpetuate Native identity, resilience, and cultural endurance. Connections to cultural heritage sustain the health and vitality of Native peoples.

We appreciated the DOI's effort to uphold the United States' government-to-government relationships with Tribal Nations by holding what it defined as Tribal consultation on the AMHR grant program. That said, the video conferences with representatives of Tribal Nations that were held on July 8th and 9th were listening sessions and not "Tribal consultation." The term "Tribal consultation" has a specific legal definition in regard to the National Historic Preservation Act and the Section 106 process. We implore DOI staff to be leaders among federal employees and not to casually use the term "Tribal consultation."

NATHPO is concerned that the listening session was specifically focused on AMHR grants for Tribal Nations. It is important that Tribal Nations be involved in all decision-making about activities occurring on their lands, and also on lands that are culturally important or sacred to them. This includes decisions being made about hardrock mine reclamation, regardless of whether those mines are located on currently-held Tribal lands and whether it is a Tribal Nation, state, or private entity that receives a federal grant to engage in mine reclamation activities.

While it is good that there is a process in place to remediate abandoned mines, it is important that the DOI specifically and the federal government in general take this opportunity to learn from the history that made federal hardrock mine reclamation grants necessary now. If meaningful consultation with Tribal Nations had occurred before these mines were developed decades ago, we may not be in the position of reclaiming lands and resources today. Moving forward, respecting Tribal sovereignty requires dialogue on development projects so Tribal Nations can ensure development activities are carried out in ways that protect cultural sites, the environment, and other resources so remediation efforts are not as necessary when projects end.

A key part of an efficient and effective consultation process that provides for adequate protection of Tribal Nations' cultural resources and sacred places, whether on AMHR grants or new mining projects, is providing adequate federal support for THPOs. In Fiscal Year 2025, THPOs are receiving on average

PROTECTING NATIVE PLACES

\$100,900 from the Historic Preservation Fund (HPF). NATHPO strongly supports a reauthorization of the HPF that would require that:

- THPOs receive a minimum of 20 percent of the HPF each year, and;
- direct the National Park Service to review if THPO funding is keeping pace and adjust the funding to reflect the annual increase in the number of THPOs.

We also urge the Administration to propose budgets and Congress to pass appropriations bills that reflect the important role that THPOs play in protecting the places that tell the stories of Tribal Nations.

Consistency and certainty are important for both THPOs and the companies whose projects are essential for all Americans, including members of Tribal Nations. We are confident that with thoughtful changes and proper funding for THPOs, the project permitting process can be efficient, while at the same time guaranteeing that Tribal Nations' cultural resources are protected.

Thank you for considering our comments. Please do not hesitate to contact me if you would like to discuss this matter or if I can be helpful in any other way.

Sincerely,

A handwritten signature in black ink that reads "Valerie J. Grussing". The signature is written in a cursive, flowing style.

Valerie J. Grussing, PhD
Executive Director