



**NATIONAL ASSOCIATION  
OF TRIBAL HISTORIC  
PRESERVATION OFFICERS**

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September 25, 2024

Sara Bronin  
Chair  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Dear Chair Bronin,

The National Association of Tribal Historic Preservation Officers (NATHPO) has the following comments regarding the Advisory Council on Historic Preservation's proposed Exemption for Indigenous Knowledge-Informed Activities by Native Hawaiian Organizations (NHOs).

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 want to offer our strong support for the proposed exemption for Indigenous Knowledge-informed activities by NHOs. This proposal sends a strong signal that the ACHP supports the use of Indigenous Knowledge as a valid and self-supporting means for evaluating the impact federal projects will have on cultural resources and places. Although, under the law, NHOs are not permitted to establish THPOs, as Indigenous peoples living in the United States, they face many of the challenges related to protecting and preserving cultural resources and places that Tribal Nations face.

This, along with other actions, makes clear that ACHP understands and respects that Native ways of knowing are important to a full understanding of the potential impact of federal projects on cultural resources and places of Indigenous communities. NATHPO commends the ACHP for its robust engagement effort with NHOs to ensure that their needs and perspectives are accurately represented in the exemption.

We are optimistic this exemption marks the beginning of a greater understanding of the importance of Indigenous Knowledge to consultation on federal activities on all lands that are part of the United States. We urge the ACHP to continue to explore actions that recognize the importance of ancestral lands to Native peoples and strengthen the role they play in the consultation process on these lands.

Thank you for your work on this proposed exemption.

Sincerely,

Valerie J. Grussing, PhD  
Executive Director

**PROTECTING NATIVE PLACES**