



**NATIONAL ASSOCIATION  
OF TRIBAL HISTORIC  
PRESERVATION OFFICERS**

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September 19, 2025

Secretary Brooke Rollins  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, DC 20250

Dear Secretary Rollins,

The National Association of Tribal Historic Preservation Officers (NATHPO) has the following comments regarding the U.S. Department of Agriculture's (USDA) initiation of an environmental impact statement (EIS) and rulemaking concerning management of inventoried roadless areas on approximately 44.7 million acres of National Forest System lands.

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 appreciate the United State Forest Service's (USFS) longstanding commitment to consultation with Tribal Nations on projects to determine the potential impact on cultural resources and sacred places. These efforts reflect USDA's overall commitment to upholding the United States government-to-government relationships with Tribal Nations.

The proposed rescission of the Roadless Rule is a federal undertaking under 36 CFR Part 800 of the National Historic Preservation Act (NHPA) because it is a federal agency action that may affect historic properties, including sacred sites, traditional cultural places, and other properties of religious and cultural significance to Indian Tribes. The NHPA requires consultation on such federal agency actions. NATHPO strongly urges USDA to engage in Tribal consultation that is nationwide in scope, programmatic and focused on procedures for future, Forest-specific implementations of removing roadless protections. After that, Tribal consultation will also be needed when individual National Forest units update their management plans, and again at the project level for activities such as roads, logging, or mining. The national-level consultation informs how these local-level consultations are framed, so both are important.

Ancestral lands of many Tribal Nations are located in National Forest boundaries and it is imperative that the USFS follow the law and consult with Tribal Nations about activities in these forests. Any work in these forests should be conducted with the utmost care that reflects the importance of these lands to Tribal Nations.

The importance of engaging in Tribal consultation regarding the management of inventoried roadless areas is a reminder of the overall historical failure to involve Tribal Leaders when many of these National Forests were established. If that had occurred when these lands were designated National Forests, we would be having a very different conversation now about the management of inventoried roadless

***PROTECTING NATIVE PLACES***

areas. Moving forward, respecting Tribal sovereignty requires consultation on projects so Tribal Nations can ensure development activities are carried out in ways that protect cultural resources and sacred places.

A key part of an efficient and effective consultation process, whether on the management of inventoried roadless areas or other federal projects, is providing adequate federal support for THPOs. In Fiscal Year 2025, THPOs are receiving on average \$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 projects that are essential for all Americans, including members of Tribal Nations. We are confident that with nation-to-nation consultation 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