

P R E S E R V A T I O N

*Action*

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United States House of Representatives Appropriations Committee  
Subcommittee on the Interior, Environment and Related Agencies

Department of Interior Fiscal Year 2022 Appropriations for the National Park Service

Chairman Pingree, Ranking Member Joyce and Members of the Subcommittee, on behalf of Preservation Action's more than 3,000 members and supporters, representing nearly every state, I appreciate the opportunity to present written testimony on the Department of Interior's FY 2022 Appropriations for the National Park Service and its historic preservation programs. My name is Russ Carnahan and I'm the President of Preservation Action. Founded in 1974, Preservation Action is a 501(c)4 nonprofit organization created to serve as the national grassroots advocacy organization for historic preservation. We represent an active and engaged grassroots constituency from across the country, and we appreciate the opportunity to provide their perspective.

On behalf of members and supporters across the country, I'd like to thank the subcommittee for their strong support of historic preservation programs and priorities in the past several Interior Appropriations bills, and especially for the FY21 Interior Appropriations bill which provided critical funding for historic preservation priorities. Thanks to your support, programs that have a proven track record of saving places Americans value, revitalizing communities, combating climate change by reusing infrastructure, and telling the story of historically marginalized and underrepresented groups, continue to benefit all Americans.

Preservation Action's mission is to make historic preservation a national priority. For 47 years we've advocated for sound preservation policy, including two of the most important tools for historic preservation- the Historic Preservation Fund and the Federal Historic Rehabilitation Tax Credit (HTC).

#### **National Park Service: Historic Preservation Fund**

The Historic Preservation Fund (HPF) is the principal source of funding to implement the nation's historic preservation programs. Since 1976 the HPF has helped to recognize, save, revitalize and protect America's historic resources. Preservation Action is extraordinarily grateful for the strong support Congress and especially this Committee have shown for the HPF in recent years, including FY 2021's \$143.3 million, the highest level of HPF funding in history. The HPF provides funding to states and tribes to carry out their federally mandated duties and supports critically important competitive grant programs. We especially appreciate this committee's continued support of programs like the African American Civil Rights Grant

Program, the History of Equal Rights grant program, the Underrepresented Communities Grant Program, and others that are helping to tell a more diverse and inclusive American story.

Preservation Action urges this subcommittee to continue their strong support of historic preservation by appropriating the fully authorized **\$150 million in funding for the Historic Preservation Fund in FY22's Department of Interior budget**. Including funding at the following levels:

- **\$60 million for State Historic Preservation Officers (SHPOs)** for heritage preservation and protection programs that create jobs, economic development, and community revitalization. In partnership with the federal government, SHPOs carry out the primary functions of the National Historic Preservation Act including –finding and documenting America’s historic places, making nominations to the National Register, providing assistance on rehabilitation tax credit projects, reviewing impacts of federal projects, working with local governments, and conducting preservation education and planning. Additionally, states are required to match at least 40% of the money they receive from the HPF.
- **\$24 million for Tribal Historic Preservation Officers (THPOs)**. THPOs are designated by federally recognized tribal governments that have entered into an agreement with the Department of the Interior to assume the federal compliance role of the SHPO on their respective Tribal lands. Tribal historic preservation plans are based on traditional knowledge and cultural values, and may involve projects to improve Indian schools, roads, health clinics and housing. Funding levels have not kept pace with the growing number of Indian Tribes with THPO programs, resulting in a lower average grants per tribe.
- **\$19 million for the African American Civil Rights Initiative Competitive Grants**. A competitive grant program to preserve the sites and stories of the African American struggle to gain equal rights in America.
- **\$7 million for the History of Equal Rights Grant Program**. A competitive grant program to preserve the sites and stories related to the struggle of all people to achieve equal rights in America.
- **\$20 million for Save America’s Treasures Program**. Save America's Treasures grants program helps preserve nationally significant historic properties and collections that convey our nation's rich heritage to future generations of Americans.
- **\$10 million for Historically Black Colleges and Universities**. Funding would provide grants to Historically Black Colleges and Universities (HBCUs) to preserve and repair historic buildings on the campuses of HBCUs.
- **\$9 million for the Paul Bruhn Historic Revitalization Subgrants**. Supports the rehabilitation of historic properties and fosters economic development of rural communities through subgrants.
- **\$1 million for the Under-Represented Communities Grant Program**. These competitive grants support the survey and nomination of properties to the National Register of Historic Places and as National Historic Landmarks associated with communities currently under-represented.

- **Semiquincentennial Grants.** We strongly support funding for the competitive grant program to preserve publicly owned historical sites commemorating the upcoming 250th anniversary of the founding of the United States.

### **Total Historic Preservation Fund Request: FY 2020 \$150 million**

#### **National Park Service: National Heritage Areas**

We'd also like to express our support for the Preservation Partnership Program which supports National Heritage Areas nationwide. Designated by Congress, National Heritage Areas (NHAs) are community-driven sites that weave cultural, natural, and historic resources together to tell nationally significant stories. NHAs rely on public-private funding where every federal dollar allocated is matched with an average of \$5.50 in public and private funds. Preservation Action greatly appreciates Congress and this Committee's continued support of NHAs.

While we appreciate Congress's support of NHAs, funding has not kept pace with the need and popularity of the program. Since 2004 the number of NHAs have more than doubled while funding for the program has only increased by 33%. To bring funding in line with the increased number of NHAs, Preservation Action requests, in accordance with the National Alliance of National Heritage Areas, **\$32 million for National Heritage Areas through the Preservation Partnership Program** in the FY22 Department of Interior's budget. Preservation Action also supports the bipartisan **National Heritage Area Act of 2021** (H.R. 1316) which establishes standardized criteria of NHAs and ensures long term sustainability.

#### **National Park Service: Proposed Changes to the National Register of Historic Places**

Preservation Action would like to thank the subcommittee for including report language in the FY20 Interior Appropriations bill and the FY21 Interior Appropriations bill expressing concern over the previous Administration's proposed rule changes to the National Register of Historic Places. The proposed rule changes would have had a devastating impact on how historic resources are nominated to the National Register and determined eligible. We were very pleased that the Department of Interior announced they would no longer be pursuing the rule changes.

#### **Advisory Council on Historic Preservation**

The Advisory Council on Historic Preservation (ACHP) is an independent federal agency that promotes the preservation, enhancement, and sustainable use of the nation's diverse historic resources, and advises the President and Congress on national historic preservation policy. We appreciate the continued support of this important agency and urge the Committee to support **\$8 million for the ACHP in the FY 2022 Interior Appropriations Bill**. In the coming year, the ACHP will implement the findings of its "Digital Information Task Force" to utilize mapping tools to identify and protect historic resources and advance timely delivery of major infrastructure projects. An increase in funding will enhance the critical functions of the agency in ensuring the nation's historic and cultural resources are protected, while advancing tribal consultation and finding efficiencies in federal reviews.

#### **Federal Historic Rehabilitation Tax Credit**

The Historic Rehabilitation Tax Credit (HTC), administered by SHPOs, THPOs and the National Park Service, is the most significant federal investment in historic preservation. The HTC has been a catalyst for development, rehabilitating of more than 45,000 historic buildings across the nation and leveraging over \$173 billion in private investment. Since inception, the HTC has created nearly 3 million jobs and produced over 172,000 affordable housing units. In addition to revitalizing communities and spurring economic growth, the HTC returns more to the Treasury than the cost of the program. The HTC has helped to rehabilitate historic structures and revitalize communities in all 50 states, the District of Columbia, Puerto Rico and the U.S Virgin Islands.

The **Historic Tax Credit Growth and Opportunity Act** (H.R 2294) would increase the value the HTC, improve access to the credit, and make the credit more appealing for smaller projects. The legislation also includes a temporary increase in the credit that would help address pandemic related challenges the industry is facing. **Preservation Action and its national members urge Congress to pass the HTC-GO Act and continue to support the Historic Tax Credit by sufficiently funding SHPOs, THPOs and the National Park Service who administer the program.**

### **Conclusion**

Preservation Action appreciates the opportunity to provide our views on the FY22 Department of Interior budget. We work closely with a broad cross-section of preservation professionals from the state and local level and are pleased to be able to add their perspective.

Preservation Action continues to value the dedicated work of National Park Service employees, the partnership of the Advisory Council on Historic Preservation as well as the instrumental work of SHPOs and THPOs in preserving America's cultural heritage.

Thank you for valuing the input of the preservation community as you consider the FY22 Department of Interior budget and your past support of vital historic preservation programs. We look forward to working with the committee and are happy to answer any questions you may have.

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