

Dear Local Government Leaders:

The National Alliance of Preservation Commissions (NAPC) represents more than 3,500 local historic preservation commissions across the country. Our members include volunteer commissioners, local government staff, small business owners, and preservation professionals who work every day to protect the historic places, cultural resources, and community character that make their communities distinctive.

We are writing to raise an issue that may not be familiar to every local government leader, but that could have a very real impact on your community: proposed changes to Section 106 of the National Historic Preservation Act (NHPA).

Section 106 is a process that requires federal agencies to consider how their projects, funding, permits, licenses, and approvals may affect historic properties.

In practical terms, Section 106 gives local governments and the public an opportunity to know about federal actions that could affect important places in their community and provide information and participate in discussions about how those impacts should be addressed. These projects could include a historic neighborhood, downtown, archaeological site, cultural landscape, historic building, cemetery, or other places that matter to a community.

Section 106 does not give local governments a veto over federal projects. It does, however, provide a structured opportunity for local governments, preservation commissions, Tribes, State Historic Preservation Offices, and the public to share local knowledge and help shape better-informed decisions before impacts become irreversible.

On July 24, 2026, the Advisory Council on Historic Preservation (ACHP) voted to move forward with a Notice of Proposed Rulemaking to substantially revise the federal regulations implementing Section 106, found at 36 C.F.R. Part 800. NAPC supports efforts to make federal review more efficient, predictable, and effective. However, changes of this magnitude should not come at the expense of meaningful consultation, local knowledge, public accountability, or the ability for communities to participate in decisions that affect them.

The proposed revisions would fundamentally change the established Section 106 framework.

The proposal could:

- **Fewer projects could receive meaningful review:** This could mean less consultation, fewer negotiated mitigation measures, and fewer opportunities for communities to shape decisions affecting their own historic and cultural resources.
- **Reduce opportunities for communities to participate:** Fewer projects could receive the level of consultation that currently allows local governments and communities to identify concerns, provide information, and help develop solutions.
- **Narrow what resources and impacts are considered:** The proposal redefines what a historic resource is and how it is classified. The current definition, which includes landscapes, archaeological sites, and natural elements like mountains and rivers, has been accepted for decades. The new definition removes these items from the classification as an historic resource.
- **Limit local input into mitigation:** When adverse effects cannot be avoided, communities should have a meaningful opportunity to help determine appropriate measures to address those impacts.

Mayors, city managers, county administrators, council members, planning officials, preservation commissions, and other local government leaders have something federal agencies often do not: direct knowledge of the communities they serve.

You know which neighborhoods are historically significant. You know which landscapes define your community. You know where important archaeological resources, cemeteries, cultural sites, and places of community memory may be located. You know which projects have the potential to affect residents, businesses, and neighborhoods in ways that may not be apparent from a federal perspective. That local knowledge is not an obstacle to federal decision-making. Instead, it is a resource.

Meaningful consultation can help identify concerns early, prevent conflicts, improve project outcomes, and avoid costly problems later. It can also help federal agencies understand the full context of the places and communities their decisions affect. The proposed changes risk moving decision-making away from the communities experiencing the consequences and toward greater discretion within federal agencies.

The proposed changes could affect your community even if your local government has never formally participated in a Section 106 consultation. We encourage you to learn more about the proposed changes and consider how they could affect your community.

Our Request to Mayors and Local Government Leaders

NAPC respectfully asks you to:

- Learn about the proposed changes and consider what reduced local participation could mean for projects and resources in your community.
- Share this issue with your governing body, planning and preservation staff, historic preservation commission, and other relevant local officials.
- Engage with your State Historic Preservation Office and other local and regional partners to understand how the proposed changes could affect your community.
- Submit comments and communicate directly with the ACHP during the federal rulemaking process, emphasizing the importance of meaningful local government and public participation.
- Ask your congressional delegation to provide oversight and ensure that the proposed changes do not undermine the role of local governments and communities in federal decisions affecting their communities.
- Consider adopting a resolution or issuing a letter from your local government expressing support for maintaining meaningful local, Tribal, and public participation in the Section 106 process. NAPC has created a proclamation template you can use here:
<https://tinyurl.com/a9njxvvy>

The places that give a community its identity cannot always be understood from Washington, D.C., or from a federal project file. They are understood by the people who live there, govern there, work there, and care for those places every day. When federal decisions have local consequences, local governments should have a meaningful opportunity to participate before those decisions are final.

NAPC believes that protecting this principle is not simply about historic preservation. It is about local knowledge, community participation, responsible government, and ensuring that federal decisions account for the people and places they affect. We urge mayors and local government leaders across the country to join us in defending the inclusion of meaningful local voice in federal decision-making.



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NAPC is ready to serve as a resource to you and your staff. We welcome the opportunity to provide additional information, answer questions about Section 106, and help local governments understand and respond to the proposed changes.

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