



# National Programmatic Agreement for Phasing Section 106 “Phasing NPA” Guide for State Historic Preservation Offices (SHPOs)

## Your Role

As SHPO, you will be invited to consult to develop the Heritage Implementation Plan (HIP) and project design as a “HIP consulting party.” A HIP consulting party is any entity that has a consultative role in the Section 106 process defined by 36 CFR § 800.2(c), such as SHPOs/THPOs, Tribes, applicants (if applicable), and local governments with jurisdiction (if applicable).

The following opportunities are the primary areas where SHPO may participate:

- **Application.** Within 30 days of receiving the Forest Service (FS) invitation to consult on the development of the HIP, SHPO may accept the invitation or raise concern about applying the NPA based on the Phasing NPA’s criteria. If another existing PA may apply to the project, the SHPO must agree to use the NPA instead of the existing one. If concerns are raised, the FS must address them.
- **Development of HIP.** If the FS proceeds to develop the HIP, the FS will send HIP consulting parties a package of available information about the project. At this point, the SHPO may begin to consider proposing any activities that recognize, preserve, protect, and enhance cultural resources or historic properties that may be appropriate for FS to incorporate into the project. The FS may invite SHPO to other meetings related to the project and its environmental review process. SHPOs should expect a minimum of two opportunities to review the HIP, one of which is the final review period that requires 30 days.
- **Finalization of HIP.** SHPO must receive a final 30-day review period before the FS issues the signed HIP. If SHPO expresses support or does not respond within 30 days, the FS agency official may proceed to issue the HIP through signature. If SHPO sends a letter of concern within 30 days of receipt, the FS will attempt to resolve them. If the FS cannot resolve such concerns, the FS or SHPO must request the Advisory Council on Historic Preservation (ACHP) to comment. After the ACHP provides comments to the FS, the FS will decide how to proceed. If the FS decides to issue the HIP, SHPO will receive a copy of the signed HIP.
- **Implementation of HIP.** After issuing the HIP, the FS must fulfill the commitments outlined in the HIP. At minimum, the SHPO should expect to receive annual reports regarding the HIP’s implementation, along with any other consultation the HIP requires.

If at any point throughout the HIP development process, SHPO or other HIP consulting party express concern, they may request the ACHP to participate in the consultation or provide comments.

## More information

This presents a very brief overview of SHPO’s role. For more details, please review the Phasing NPA and other materials on the [Phasing NPA webpage](#). To provide comments or suggestions on improving the use of the Phasing NPA during the 2-year monitoring period (December 2021- December 2023), please email them to [SM.FS.HeritAgrmnt2@usda.gov](mailto:SM.FS.HeritAgrmnt2@usda.gov).