



Thursday, July 23, 2026

The Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Re: Urgent Request to Withdraw July 17 Draft Revision of Section 106 (36 CFR Part 800)

To the Honorable Members of the Advisory Council on Historic Preservation:

I am the Founder and Head of The Culture Keepers Circle, a national grassroots movement to protect the people, places, practices, and treasures that embody the contributions of African-descendant, Indigenous, Latiné, Asian American, and Pacific Islander communities to American life.

It has been reported that the Council is currently conducting an expedited and private vote on a comprehensive revision of Section 106 of the National Historic Preservation Act (36 CFR Part 800). The draft, circulated on Friday, July 17, represents a revision that effectively rewrites the regulations governing federal historic preservation review in effect for more than three decades. The current balloting process restricts members to a mere week for consideration, bypassing formal assembly and denying the vital exchange of perspectives necessary for such transformative rulemaking.

The Culture Keepers Circle formally requests that the Council rescind the current proposal and return to a deliberative process with adequate transparency and public awareness. We respectfully contend that Council members possess diverse perspectives on these matters and should be granted sufficient time to deliberate, provide critical analysis, and offer substantive alternatives to the draft. Furthermore, we assert that community stakeholders, particularly those engaged in existing Memoranda of Agreement with the Council, must be granted an active role in shaping any proposed changes to contravene the overwhelming commercial and economic interests reflected in the current draft.

Furthermore, we are compelled to address the profound impact these revisions will impose upon the communities we represent. The comprehensive rewrite the Council currently considers risks *irreparable* damage to the 96,000 current property listings and historic districts of the National Register of Historic Places, which account for roughly 1.9 to 2 million individual contributing resources. However, the pending regulation falls harshest on heritage that was never documented: unmarked burial grounds of Enslaved and Free African Americans, sacred landscapes of Indigenous peoples not recognized by federal governments, and the historic neighborhoods where Chinatowns, Koreatowns, Barrios, and other cultural districts are rooted. Many of these places have been severely impacted by urbanization and remain formally



undocumented because the people who made them were denied the means, standing, and occasions to record them.

Accordingly, The Culture Keepers Circle urges the Advisory Council take the following actions:

1. Rescind the current proposal and return to a deliberative process with adequate transparency and collaborative participation;
2. Convene a properly noticed meeting at which Advisory Council Members can deliberate and substantively opine on the proposed changes to Section 106
3. Meet with Tribal nations and cultural heritage stakeholders, particularly those engaged in existing Memoranda of Agreement with the Council, before any vote; and
4. If the Council proceeds to publication, provide a comment period of no fewer than 90 days on the current or any future proposal to Section 106.

We welcome the opportunity to directly present the concerns of the communities we represent within a more collaborative and transparent Section 106 reform process.

Respectfully,

A. Prince Albert III
Founder, The Culture Keepers Circle
Contact@CultureKeepersCircle.org

CC: Kelly Fanizzo, General Counsel, Advisory Council on Historic Preservation
(kfanizzo@achp.gov)