



Summary of Comments Received on the December 2023 Draft NASA-wide Programmatic Agreement

NASA received over 450 written comments to the December 2023 draft of the *Programmatic Agreement Among the National Aeronautics and Space Administration, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers Regarding the Management of NASA Centers* (NPA). Comments can be summarized as follows:

Tribal Consultation and Indigenous Knowledge

- Calls for improved outreach to tribes and better incorporation of indigenous knowledge throughout the process
- Recommendations to include more tribes in consultation, not just those with previously demonstrated interest
- Requests to broaden tribal involvement beyond just archaeology

Clarification and Definitions

- Requests for clearer definitions of terms like “Asset” and “Heritage Zone”
- Recommendations for more explicit definitions of roles and responsibilities
- Requests for clarification and additional details on various aspects of the agreement, such as development of Asset Lists, identification of Heritage Zones, training, reporting, and resolving objections
- Suggestions to simplify the overall document and use language more closely tied to existing preservation laws

Technical and Procedural Improvements

- Recommendations for refining technical aspects of the agreement, such as the use of GIS tools and archaeological sensitivity models.
- Concerns that the agreement focuses too heavily on archaeology and not enough on other types of cultural resources
- Suggestions for making the agreement more adaptable to changing circumstances, such as updates to asset lists and Heritage Zones
- Recommendations for periodic reviews and updates to ensure the agreement remains relevant and effective

Review and Consultation Processes

- Calls for longer review periods and more opportunities for input from various parties
- Requests for more involvement of SHPOs, tribes, and other consulting parties
- Suggestions for more detailed documentation of consultation efforts and public involvement

Training and Qualifications

- Emphasis on the need for training for NASA staff and consulting parties to effectively implement the agreement
- Calls for adequate resources and support for historic preservation efforts, including funding and staffing

Individual comments and NASA responses are captured in the “December 2023 draft NPA – Adjudicated Comment Matrix_June 2025” document, submitted to NPA Consulting Parties in June 2025.