

Summary of Changes between the 2012 and 2025 National Programmatic Agreement

Preamble

The Preamble has been reduced to only whereas clauses and has simplified/reduced much of the 2012 text. In doing so, some of what would be considered background information has been removed or simplified. A lot of this restated our requirements under NHPA and other laws. References to requirements under other laws have mostly been removed.

Stipulations

"Components" have been changed to "stipulations," which is more appropriate for a PA. Stipulations have been reorganized from the 2012 version.

Component in 2012	Stipulation in 2025
1. Applicability	1. Applicability
2. BLM Consultation Responsibilities under this Agreement	2. BLM Consultation Responsibilities under this Agreement
3. Operation of the BLM's Preservation Board	3. Operation of the BLM's Preservation Board
4. Cultural Resource Management Procedures for Consideration of the Effects of the BLM's Undertakings on Historic Properties	6. Cultural Resource Management Procedures for Consideration of the Effects of the BLM's Undertakings on Historic Properties
5. Thresholds for ACHP Notification	7. Thresholds for ACHP Notification
6.a., f. Cooperation and Enhanced Communication	8. Cooperation and Enhanced Communication
6.b. BLM-SHPO Protocols	4. State BLM-Protocol Procedures
6.c-e. BLM-Tribal Relations	5. BLM and Tribal Engagement
7. BLM Staff Training Program	9. BLM Staff Training Program
8. Professional Development	10. Professional Development
9. District or Field Office Certification and Decertification	11. State, District, or Field Office Certification and Decertification
10. Accountability Measures	12. Accountability Measures
11. Reviewing and Changing the Agreement	13. Reviewing and Changing the Agreement

1. Applicability
 - a. Language modified slightly to account for continued use of existing Protocols, if appropriate.
 - b. No changes.
 - c. New addition.
2. BLM Consultation Responsibilities under this Agreement
 - a. "Encourages" and "requires" have been flipped, but otherwise mostly unchanged.
 - i. No change.
 - ii. No change.
 - iii. No change.

- iv. No change.
 - b. Now "encourages" rather than "requires" (just flipped a. and b.).
 - i. "revise, as needed" rather than "develop"
 - ii. No change.
 - iii. Old 2.a.(3) has been removed. iii. is unchanged from old 2.a.(4).
 - iv. Minimal changes from old 2.a.(5).
 - v. New, to address non-destructive planning.
3. Operation of the BLM's Preservation Board
- a. Minimal changes to wording.
 - b. Addition of the state TLO term member. Section reorganized but otherwise unchanged.
 - c. Minor changes to wording.
 - d. Minor changes to wording.
4. State BLM-Protocol Procedures
- a. Gives states 3 years to revise protocols, if needed (rather than the 2012 one-year timeframe to write new protocols). Last two sentences are new.
 - b. No changes.
 - c. Minimal changes. Adds "identification and monitoring of historic properties."

The third paragraph in the 2012 component 6.b. has been removed.

5. BLM and Tribal Engagement
- Minimal changes, other than removing "develop a process for providing information and schedules of pending actions, including land exchanges, permits, and approvals on a regular basis."
6. Cultural Resource Management Procedures for Consideration of the Effects of the BLM's Undertakings on Historic Properties
- a. Simplified from 2012 intro paragraph.
 - b. Revised version of the first half of 2012 component 4.a.
 - c. Revised version of the second half of 2012 component 4.a. and 4.a.(1)-(3).
 - d. No major changes from 2012 component 4.b. Section vi.3. has been added to address a concern from SHPOs that wanted to review findings or request additional information to support BLM determinations.
 - e. Minor changes (2012 component 4.c.).
 - f. No changes.
 - g. Addition of, "Resolution of adverse effects (including through development and execution of a MOA or PA) must be completed prior to a NEPA decision."
 - h. No changes.
 - i. No changes.
 - j. No changes.
 - k. No changes.
 - l. No changes.
 - m. No changes.

7. Thresholds for ACHP Notification

2012 stipulation 5.a. was deleted, as it was never used.

- a. No change.
 - i. No change.
 - ii. Language strengthened at request of ACHP.
 - iii. Language strengthened at request of ACHP.
 - iv. No change.
- b. No change.
- c. No change.

8. Cooperation and Enhanced Communication

- a. Minor changes.
- b. No changes.

9. BLM Staff Training Program

- a. Minor changes.
- b. New statement.

10. Professional Development

- a. Minor changes.
- b. No changes.

11. State, District, or Field Office Certification and Decertification

- a. Minor changes.
- b. No changes.
- c. No changes.

12. Accountability Measures

- a. Minor changes.
- b. Minor changes.
- c. Minor changes.
- d. No changes.
- e. No changes.

13. Reviewing and Changing the Agreement

Minimal changes throughout.