

July 19, 2023

Dear Chair Bronin,

The National Alliance of Preservation Commissions (NAPC) thanks you for the opportunity to provide comments related to the application and interpretation of the SOI Standards (Standards). NAPC's membership includes communities from across the nation that largely rely on the Standards for Rehabilitation to guide decision-making at the local level. Our goal at NAPC is to help build strong local preservation programs and leaders through education, training, and advocacy. This includes providing communities with an understanding of best practices related to the application and interpretation of the SOI Standards in order to support consistent and defensible outcomes.

Local commissions, many of which are Certified Local Governments (CLG), are often at the forefront of the application of preservation policy. Thousands of decisions impacting historic properties are made every year by local government preservation programs. We know that preservation programs are most successful when requirements are clear, predictable, and consistently applied. Most communities have adopted the Secretary of the Interior's Standards for Rehabilitation as evaluation criteria. Ongoing preservation of our communities requires a thoughtful balance of preservation and adaptation. However, the interpretation of these treatment concepts can often lead to variation or inconsistency in application.

We applaud the ACHP for opening the conversation about this topic. We have offered some initial comments below in the hopes that this conversation will continue and will result in changes that support flexibility and adaptability, address modern-day issues, and provide additional support through new or expanded guidance. We ask that this dialogue about this important and complex topic continue and take into consideration the potential for positive impacts to preservation practice at the local level.

- **Non-traditional Property Types:** The practice of historic preservation is ever-evolving and expanding to capture a broader collection of properties and histories that offer a better representation of diverse and historically underrepresented communities. It is not uncommon for properties to possess cultural significance, which is not solely interpreted by physical building fabric. In these instances, communities may struggle to apply traditional standards, which were intended to preserve the architectural and material integrity of a property. There are no widely understood treatment standards which respond to issues surrounding intangible heritage, experiential qualities, public memory, and traditions which allow communities to be better stewards of properties where historic building fabric is not the priority.

- **Application in Historic Tax Credit Reviews:** The Historic Tax Credits (at both the State and Federal Levels) are a powerful tool for communities with historically underutilized or vacant building stock in need of investment. The properties often represent a wide range of building types and uses including industrial or manufacturing which have become obsolete. Projects requiring adaptive reuse in order to prolong the life and use of historic properties often present conflict with the Standards, in particular standard #1 regarding changes to use and building features which are required for adaptation.

Special consideration or flexibility should be given for certain properties that must be adapted to accommodate new uses, especially where the original building forms and characteristics are no longer viable for modern day use. A rigid application of the current standards will often disqualify these properties for Historic Tax Credits, leaving them at risk of continued neglect or demolition. This in turn is potentially harmful for communities seeking to leverage historic resources for economic growth and cultural continuity.

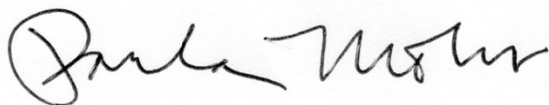
- **Changes in Material Production, Advances in Technology:** The recent lumber supply chain crisis highlighted an issue in historic preservation: the quality and affordability of quality, in-kind materials. When original wood features must be replaced, replacement wood is often of poor quality and requires significant treating and maintenance in order to last. Substitute materials may be a lasting and sustainable option in some applications such as porch elements or exterior features. More and more composite materials are beginning to feature recycled content or upcycled waste products which may be more environmentally sustainable than relying on virgin lumber. The Standards should be updated to explicitly state that substitute materials may be appropriate within certain applications and which are visibly compatible with historic materials.
- **Diversity, Equity, and Inclusion:** The practice of preservation has expanded (for the better) to access new communities which were historically excluded from preservation efforts, including working-class neighborhoods or those with predominantly minority populations. It is important that preservation policy works as a living and evolving tool for underserved communities and that the standards themselves consider impacts to historically marginalized groups. This includes consideration of economic hardship and the feasibility of traditionally-applied standards in economically disadvantaged communities.
- **Climate Action and Adaptation:** Our built environment plays a critical role in climate action and adaptation. The Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings is an important contribution to the practice of preservation, but more is needed to address the changing climate and position preservation to be part of the solution. The SOI Standards and related guidance should be updated to reflect the importance of preservation and building reuse and a strategy in addressing climate change. Depending on the unique regional impacts to a property, adaptation and

retrofit will become a more critical strategy when considering the longevity and resiliency of historic building stock.

- **Flexibility and Negotiation:** Reviewers and professionals at different levels of government must understand the importance of adopting solutions-driven policies that reconcile the Standards with real-world challenges of implementation and adaptation. The Standards and related guidance should authorize professionals and staff to find the best path forward with the priority being supporting investment in our historic resources. Specifically, interpreting the standards, consulting to reach a consensus, and negotiating when the ideal cannot be achieved will serve the interests of affected portions of the public and support consensus decisions in Section 106 and historic tax credit reviews. However, hierarchy in government roles and inflexible interpretation of standards often preclude opportunities for interpretation, negotiation, and consensus. Broadening the goals of the Standards in their application to allow for informed, place-based decision-making would strengthen pathways for success and allow for negotiation at all levels of government for streamlined results.

Thank you for this opportunity to offer preliminary comments on this complex topic. The National Alliance of Preservation Commissions looks forward to continuing the discussion and identifying ways that we all can practice preservation in a way that is more inclusive, sustainable, and effective.

Sincerely,



Paula Mohr
Chair, National Alliance of Preservation Commissions