

November 6, 2023

Hon. Sara C. Bronin
Chair
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Re: Comments on ACHP's Draft Policy Statement on Housing and Historic Preservation

Dear Chair Bronin,

The National Alliance of Preservation Commissions (NAPC) thanks you for the opportunity to provide comments related to the Advisory Council on Historic Preservation's Draft Policy Statement on Housing and Historic Preservation (draft dated 9/8/2023). NAPC's board and membership have been studying this topic and experiencing the challenges involved with adapting buildings for housing. Our goal at NAPC is to help build strong local preservation programs and leaders through education, training, and advocacy. This work includes providing communities with an understanding of effective practices related to historic buildings and housing.

NAPC's 2021 Values and Principles Statement (Statement; see Appendix I) guides NAPC's work and provides touchpoints to ensure that our programs, messaging, and decision-making are consistent and reflect the organization's values and beliefs. The Statement also describes our aspirations for local preservation programs while recognizing that each local program places a different emphasis on the intents of federal programs and policies. Four points from the Statement guide our comments on the Housing and Historic Preservation Policy Statement:

- Understand that change to older and historic places is often necessary and inevitable and seek to manage that change in ways that are sensitive to the values and meanings that people ascribe to those places;
- Find ways for older and historic places to adapt to and meet other community needs, including affordable housing, economic prosperity, climate resilience, and equity;

- Align with and inform other municipal functions and programs including planning, zoning, demolition and building permitting, transportation, infrastructure, and economic development; and,
- Interpret and apply ordinances, standards, and policies in an equitable, yet flexible manner.

We applaud the overall tenor of the draft policy for its emphasis on flexibility and the use of the expression “when feasible and practical.” This policy is an outstanding example of how we can expand the practice of historic preservation to meet expanded goals and community needs. This phrase endorses project-specific solutions.

Thank you for noting that the interpretation of the *Secretary of Interior's Standards for Rehabilitation* (Secretary's Standards) is important in our work. Your policy supports the widely felt sense among our members that flexibility in interpretation leads to positive outcomes. We agree that the Secretary's Standards should “be applied flexibly in a way that relates to local character and needs.” Taking this approach with housing projects will emphasize a community's values, priorities, and needs.

As ACHP notes in the draft policy, this is especially important with projects involving housing, and design review should focus on exterior features. As you know, our local programs conduct design review on changes to the exteriors of buildings only, unless an interior is explicitly designated as a landmark. The legal premise is that the public good is served by the visibility of historic buildings. Hence only that portion of a building which is visible from public places, such as sidewalks and streets, is subject to design review. Rather than being a limitation, our members find this a helpful approach for balancing the wants and needs of property owners with preservation standards in that they are free to make more changes to interiors. Your proposed review of only changes to building exteriors for housing-creating projects mirrors this approach. We find this method reduces time and effort in design review and allows for projects to address factors from energy efficiency to floor plan needs. We endorse this approach.

We support the comment in the section about the Section 106 process, “consultation should focus not simply on individual buildings but on the historic preservation goals of the broader neighborhood or community.” It mirrors our statement about combining historic preservation goals with meeting community needs.

The draft policy provides an important reminder that historic preservation is part of the solution to meeting affordable housing demands, rather than focusing on the regulatory aspects of preservation programs. Housing preservation and adaptive reuse of existing buildings for affordable housing projects offers a more sustainable approach than new construction alone, offering solutions which meet expanded goals and community needs.



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ACHP's research program is extensive and points to information that we all need. While throughout the draft policy are references to many of the barriers to using historic buildings for housing, we suspect that more research can be done to identify these impediments and how they could be ameliorated, perhaps by highlighting successful case studies. Communication and messaging are important considerations in this area. We offer our recently published Messaging Guide for Local Preservation Programs (available at <https://www.napcommissions.org/messaging-guide>) as a resource and particularly pages 40-42 which discuss affordable housing.

Thank you for this opportunity to offer comments on this complex topic and endorse the direction that your policy lays out. It is promising to see concepts in your policy that support the goal of quickly making a difference in providing Americans with more housing. The National Alliance of Preservation Commissions looks forward to continuing the discussion and identifying ways to merge the provision of housing in existing buildings with local historic preservation practice.

Sincerely,

Paula Mohr
Chair, National Alliance of Preservation Commissions



CORE VALUES & PRINCIPLES

The National Alliance of Preservation Commissions helps communities build strong local preservation programs and leaders through education, training, and advocacy. The following statements will guide our work and provide touchpoints to ensure that our programs, messaging, and decision-making are consistent and reflect the organization's values and beliefs. In addition to communicating to our members, partners, and the public what NAPC believes about the importance of historic places and the communities who steward them, these values and principles will:

- Help determine advocacy priorities and positions on issues of importance to the organization and local preservation programs;
- Shape the tone, direction, and content of publications and training materials;
- Guide the Board of Directors and staff in the establishment of priorities, implementation of programs, and development of partnerships; and
- Provide a framework for evaluating past performance and future plans.

1

The National Alliance of Preservation Commissions believes the preservation and maintenance, use, (re-)interpretation, and appreciation of older and historic places:

- Strengthens community identity and distinctiveness by preserving places that reflect collective and individual identities and memories;
- Encourages communities to learn about, recognize, and share their histories;
- Strengthens communities as it preserves past and existing cultures and stories;
- Contributes to a sense of well-being, economic prosperity, and environmental sustainability;
- Leaves a lasting and tangible legacy for future generations.

2

The National Alliance of Preservation Commissions believes strong local preservation programs:

- Understand that change to older and historic places is often necessary and inevitable and seek to manage that change in ways that are sensitive to the values and meanings that people ascribe to those places;
- Recognize significant places in a community are not limited by their age, the demographics they represent, or merely design and that intangible heritage, culture, and the continued use of older and historic places are important aspects of significance and meaning;

- Meaningfully engage with people in their community, particularly groups and individuals who have been left out of discussions about significance and preservation;
- Seek new information and regularly update existing information about older and historic places in their communities, including histories previously absent from dominant historical narratives;
- Find ways for older and historic places to adapt to and meet other community needs, including affordable housing, economic prosperity, climate resilience, and equity;
- Align with and inform other municipal functions and programs including planning, zoning, demolition and building permitting, transportation, infrastructure, and economic development;
- Interpret and apply ordinances, standards, and policies in an equitable, yet flexible manner;
- Provide decision-makers and community leaders with regular, timely, and relevant training and continuing education opportunities;
- Build partnerships with local, regional, state, and national entities;
- Regularly assess and update policies and practices to ensure preservation remains relevant, valued, and responsive to change.

3

The National Alliance of Preservation Commissions and its Board of Directors, staff, and volunteers will:

- Lead discussions on national preservation issues that have impacts at the local level, including critical thinking about current practices as well as thoughtful attention to emergent topics;
- Support a range of effective practices for building strong local preservation programs and be open to new ideas and understandings of what preservation programs can and should accomplish;
- Recognize the evolving and diverse definitions of significance and integrity and support local communities' interpretation of these concepts;
- Value the knowledge, experience, and expertise of those working in preservation at the local level and continue the tradition of teaching and learning from each other;
- Demonstrate a commitment to diversity, equity, inclusion, and representation in organizational leadership and hold ourselves accountable for meeting that commitment.