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May 5, 2023

Druscilla J. Null  
Director  
Office of Preservation Initiatives  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Re: Comments on ACHP's Policy Statement on Climate Change and Historic Preservation

Dear Director Null,

The National Alliance of Preservation Commissions (NAPC) Board of Directors was pleased to learn that the Advisory Council on Historic Preservation (ACHP) is addressing climate change and historic preservation policy at the national level. This draft statement is clearly embedded in the work the agency does through Section 106 consultation, but also aspires to influence state and local governments, as well as other public-serving entities.

NAPC's members work and volunteer in preservation programs at the local government level; therefore, we have reviewed the draft policy based on our members' experience and particular perspective, as well as NAPC's Values and Principles Statement (Statement; see Appendix I). We urge ACHP to advance the recommendations, and we look forward to working collaboratively with you on several topics listed below. Our suggestions strive to ensure flexibility and equity are achievable goals, and are offered with the belief that policy, guidance, and practice changes will enhance this policy statement.

### NAPC's Goals for Local Historic Preservation Program Work

NAPC's 2021 Values and Principles Statement (Statement) 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. This guidance is primarily driven by National Register eligibility of officially recognized “historic properties.” In contrast, our Statement about what historic preservation accomplishes includes:

“Strengthens community identity and distinctiveness by preserving places that reflect collective and individual identities and memories” as well as its “past and existing cultures and stories” and as it “contributes to a sense of well-being.”

The Statement provides these aspirations for 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.”

We note that references to broader historic preservation approaches appear in the ACHP draft policy and are pleased to see phrases such as “with the need to preserve their community identity and sense of place.” The values of equity, flexibility and collaboration are present throughout our Statement and our organization is ready to share what has been achieved in these areas and explore work yet to do.

We know that our field is broadening in important ways through the work of local preservation programs. Our member communities have expanded criteria for local landmark designation beyond that of the National Register and many have adopted cultural significance criteria and considered what that means for interpretations of historic integrity and appropriate changes to places. They know that many places locally significant are not considered eligible for National Register listing. Many programs try to avoid saying “no” to local designation when communities claim places that are important to them.

We work with people who value high-style architecture and everyday places that have changed over time. We will be working extensively with the realities of retro-fitting buildings, safeguarding places, and recognizing when buildings and places can no longer be saved. Our work is all the more complicated by the varying desires of private property owners.

Local preservation programs are on the frontlines of historic preservation. They are advancing the field, and rising to the challenges, including those caused or exacerbated by climate change. However, local

preservation programs need support; therefore we offer the following suggestions and topics for collaboration.

### Specific Suggestions for the Subsequent Draft Policy

- Combine your principles further to create a strong vision for how all public-serving historic preservation entities can address climate change and the impending loss of historic and cultural properties. We suggest that you emphasize *flexible*, *collaborative* and *equitable* values as the overarching concepts that are used throughout the steps of information gathering, planning, mitigation design and implementation, and education.
- Acknowledge more clearly how disadvantaged and underserved communities can be served, particularly in the recognition of the places that matter to them that have been, and may continue to be, excluded from our nation's list of official historic properties.
- The survey of historic properties is a changing practice that includes digital technologies and is being conceptualized to meet various needs. An emphasis on flexibility in the design and function of survey projects to ensure that they meet the goals of equity is recommended.

### Topics for ACHP and NAPC to Collaborate On

- Individuals engaged in local programs have valuable insight and experience using cultural significance criteria and have strong interests in recognizing places claimed by groups as significant to their community. Let's leverage this knowledge and expertise at the local level.
- Our Statement refers to recognizing significant places but does not adopt the goal of comprehensive survey. We would like to explore how, both for local designation and the determination of National Register eligibility, we can move into a different mindset where comprehensive survey is not the only entry into preservation.
- Let's explore how local designation can be recognized as an additional indicator of local significance and historic properties status.
- All people who live by coasts and rivers, in forest fire country, arid and drought areas and where other effects are being felt, have knowledge that should be respected and incorporated into

adaptation and mitigation strategies. Let's explore how these local experts and their knowledge will be recognized and respected.

- We would like to collaborate on the development of new terms that can be used in our programs and at the federal level, except where the terms "adverse" and "negative" must be used in formal determinations. When choices are severely curtailed and new conditions prevail, is it time to use a category of "climate-change-induced effects"? A change in language will reinforce the point the draft policy makes that we need to accept changed conditions in which historic properties are situated and changes made to these properties. New language and new categories would benefit all programs.
- As most of the interventions made to historic places to mitigate climate change will come under the purview of local preservation programs, how will flexibility, collaboration and equity become prominent in decision-making? We have ideas for new approaches to analysis, including considering the range of acceptable change to historic places.
- The broad topic of making changes to historic places ranges from increasing energy efficiency to adaptation, relocation, deconstruction and demolition. Addressing the effects of climate change and operating energy efficiency will be informed by changing local conditions, the context of local resilience programs, and require flexibility. Local preservation programs will be at the forefront of considering such changes and will have experiences to share and a desire to develop recommended practices (Appendix II).

## Looking Forward, ACHP Might Consider

- Including a statement that incorporates principles of equity, flexibility and collaboration to serve as the intention statement for the policy and overarching guidance for the field.
- Providing leadership in promoting the understanding that in order to achieve these goals, mindsets and practices will need to change and establish working groups on various topics, such as those suggested here.
- Recognizing that local preservation programs have been and will continue to be where new, place-specific approaches to equity, flexibility and collaboration are tested, evaluated, adopted and shared.



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NAPC values working with the ACHP and our other preservation partners in ways that strengthen our nation's preservation programs, implement our Values and Principles Statement and supports our mission of *Helping to build strong local preservation programs and leaders through education, training and advocacy*. Our organization is committed to training and educating members on effective practices in use today. Our Advocacy function includes thinking about the long term and how our field needs to broaden and respond to new conditions. NAPC looks forward to developing an active collaboration with the ACHP on policy matters.

Sincerely,

Paula A. Mohr  
Chair, National Alliance of Preservation Commissions

Attachments



# 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.

## APPENDIX II

Regarding the continued use of existing buildings and avoiding demolition, we note the following.

Negotiations of where retrofitting occurs should take a variety of factors into consideration and be situated in flexibility and innovative solutions, consideration of the use of replacement materials, and take into account that visible elements required for retrofitting signal the continued importance of the building's use.

The environmental benefits of avoiding demolition and retrofitting buildings must be emphasized in all discussions of existing and historic buildings. Some recent and common data support this approach:

- It is estimated that reusing and retrofitting existing buildings can save between 50-75% of the carbon that would be expended by new construction of a similar building (The Carbon Leadership Forum, *Time Value of Carbon*, 2017)
- Demolition represents more than 90 percent of total C&D debris generation, representing nearly 145 million tons of landfill waste annually:  
<https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/construction-and-demolition-debris-material>.

We should collectively seek to avoid hasty and unmitigated demolition. Governments should implement policies that provide a thoughtful process for demolition review. When demolition cannot be avoided, mitigating practices such as deconstruction and reuse of salvageable materials should be employed.

The goals of equity and flexibility should highlight the fact that some occupants of older buildings may need more assistance than others. A study in San Antonio documented that disadvantaged groups are more likely to reside in older housing stock and are in greater need of weatherization and energy retrofit in response to extreme temperature swings. See *Opportunity at Risk: San Antonio's Older Affordable Housing Stock* (Prepared for the San Antonio Office of Historic Preservation; Completed by PlaceEconomics, 2019.)