



PROPOSED PROGRAM COMMENT ON ACCESSIBLE, CLIMATE-RESILIENT, AND CONNECTED COMMUNITIES

*National Alliance of Preservation
Commissions Presentation*



@USACHP

September 2024

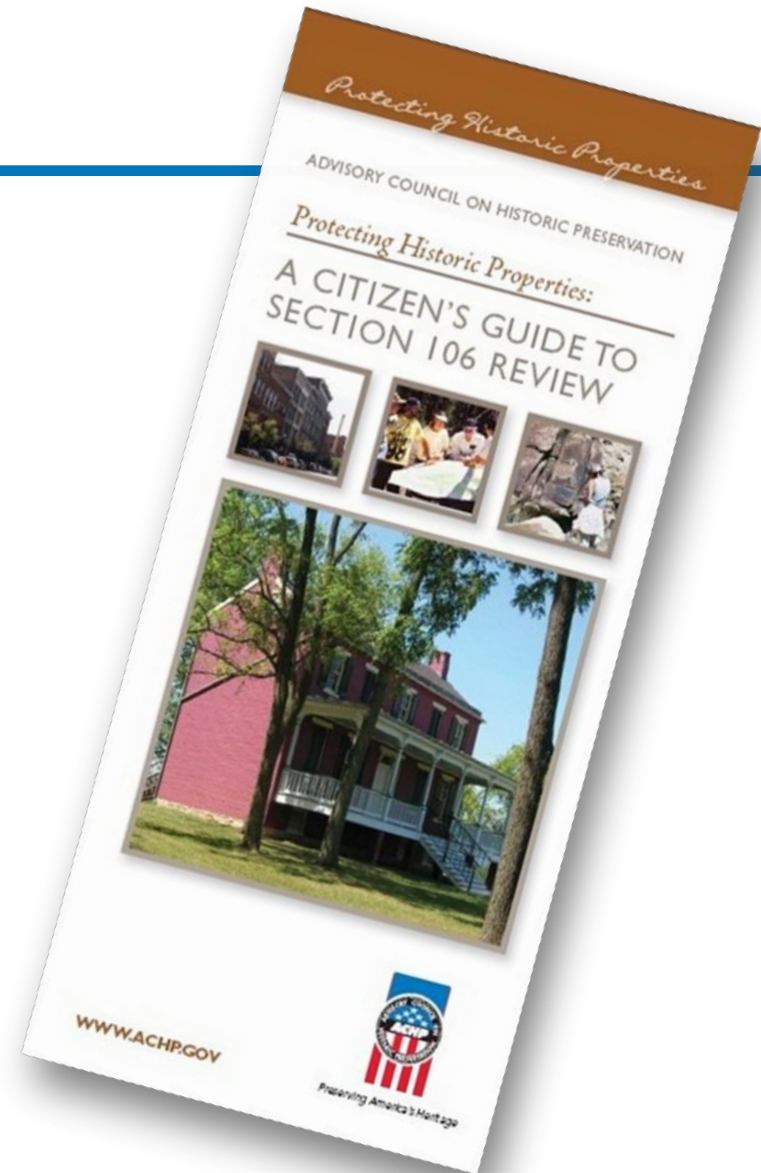
Presentation Order

- Background
- Review of the Program Comment
- Inviting Feedback

Background

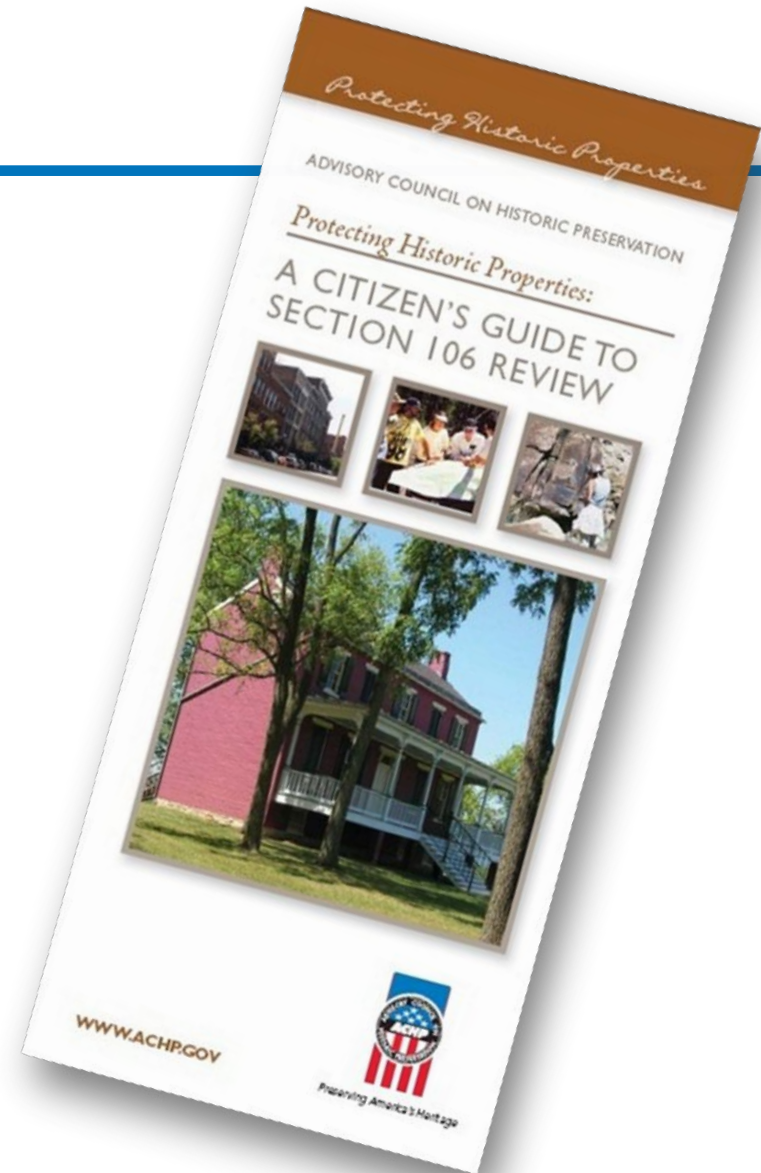
Section 106

- Requires federal agencies to take into account the effects of their actions on historic properties (National Register)
- Includes public projects (highways + courthouses) AND private projects receiving federal funding



Program Comment

- Tailors the Section 106 review process for a group of undertakings or a program affecting historic properties



Goal of this Program Comment

- Advance historic preservation goals while expanding access to **housing**, facilitating **climate-resilient and zero-emissions buildings**, and promote **climate-friendly transportation**
 - Consistent with ACHP Policy Statements on Housing & Climate Change
- Key facts:
 - 1/2 of housing units were built before 1979
 - Buildings and transportation emit 2/3 of greenhouse gas emissions
 - Buildings use 75% of electricity generated annually

Scope of this Program Comment

- All federal housing & all federally-funded private housing
 - 1 million HUD, 1 million DoD, and many more billions devoted to public & private units
- All federal buildings & all federally-funded upgrades of private buildings
 - Billions in BIL, IRA, GGRF funding
- Most pedestrian, bike, micromobility, and public transit projects
- ... across all federal agencies and programs

Review of the Program Comment

Key Topics

- Appendix A: Housing
- Appendix B: Climate-Smart Buildings
- Appendix C: Climate-Friendly Transportation

Housing *Appendix A*

- Site Work
- Building Exterior
- Building Interior
- Emergency Work
- Other Activities (energy audits, transfers/lease/sales)



Allows Rehabs, Replacement, Installation of*:

- Asphalt/concrete surfaces, equipment, fencing, lighting if previously disturbed ground
- Doors, windows, roofing, mechanical systems, and solar energy not on primary façade
- Interior walls/ceilings not in primary spaces

**Examples for illustration only; reference the Program Comment.*



The historic Liberty Tower was one of the first office buildings converted to housing in New York City in 1979.
(Photo credit: cityreality.com)

Climate-Smart Buildings *Appendix B*

- Site Work
- Building Exterior
- Building Interior
- Other Activities (energy audits, feasibility studies, purchase/lease of energy efficiency equipment, electric vehicle charging maintenance/installation)



Allows Rehab, Replacement, Installation of*:

- Green infrastructure, utilities
- Storm windows and energy meters not on primary façades
- Clean energy technologies not in historic districts, not on primary facades/visible, or on previously disturbed ground
- Thermal insulation (not spray foam), building control systems

**Examples for illustration only; reference the Program Comment.*



Climate-Friendly Transportation *Appendix C*

- Work on Ground Surfaces
- Work Involving Fixtures & Equipment
- Work Relating to Vegetation and Landscapes
- Work on Bridges
- Other Activities
(leasing/refinancing, Safe Routes to School, electric vehicle charging)



Allows Rehab, Replacement, Installation of*:

- Non-historic ground surfaces, curbs, sidewalks, bulb-outs, ramps, crosswalks, cool pavement, permeable pavement
- Bike/micromobility parking racks, flex posts <36” tall
- Benches, tables, planters, lights, & bus shelters with combined dimension <30 linear feet
- Ped/transit bridges if QA says no adverse effects

**Examples for illustration only; reference the Program Comment.*



Red Line at Metro Center Station, Washington, D.C., by
Carol Highsmith.

Certified Local Governments

- Does not change anything relevant to local ordinances – so does not change your local review process
- Requires compensation for local consulting parties – so may result in additional compensation to local groups
- Unsure as to whether you actively consult on these matters now

Summary Thoughts

- Identifying appropriate undertakings can help reduce administration burdens & costs for public & private parties
Consistent treatment of project types will ensure consistent outcomes
- Clear rules will help us deploy current and pending federal investments

Inviting Feedback

Opportunities for Feedback

- Discussion today
- Submit to program_alternatives@achp.gov
- Reply by October 9



Thank You

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