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October 9, 2024

The Honorable Sara C. Bronin
Chair

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Re: Proposed Program Comment on Accessible, Climate-Resilient, and Connected Communities

Submitted via email to program_alternatives@achp.gov

Dear Chair Bronin and members of the Council,

The U.S. Green Building Council ([USGBC](#)) is a mission-based nonprofit organization established over 30 years ago with a vision of a built environment that supports planet and people. We are focused on transforming the way buildings and communities are designed, built and operated, enabling an environmentally and socially responsible, healthy, and prosperous world. Our flagship green building system, Leadership in Energy & Environmental Design ([LEED](#)), has been embraced around the world, and applied to many historic buildings, such as [these examples](#).

We are writing in support of the proposed Program Comment on Accessible, Climate-Resilient, and Connected Communities, which will help accelerate climate resilience and sustainability improvements and promote the long-term preservation and use of historic buildings to benefit people and their communities. The American Council for an Energy-Efficient Economy (ACEEE) also supports the enclosed comments.

We respectfully offer the following comments and recommendations on each of the activity categories covered in the Program Comment:

- ***Climate-Smart Buildings***

Renovating older and historic buildings is an important strategy to reduce greenhouse gas emissions from the building sector, which is currently responsible for more than 30% of U.S.

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emissions. The most sustainable building is an existing building: our [research](#) shows retrofitting existing buildings can be up to 60% less carbon intensive than building a new high performance building. This proposed Program Comment would support decarbonization through streamlined Section 106 review, helping expedite federally supported projects that increase energy efficiency, implement clean energy technologies, and, through the reuse of older and historic buildings as an alternative to new construction, avoid new embodied carbon emissions.

Enhancing the resilience of older and historic buildings is also critical with the increasing scale and frequency of climate-driven natural disasters and extreme weather. According to the [Fifth National Climate Assessment](#), the U.S. now experiences, on average, a billion-dollar weather or climate disaster every three weeks. Facilitating climate resilience upgrades—including building envelope improvements and adding on-site renewable energy generation and/or storage—will help protect older and historic buildings, and the people who use them, in the face of growing risks. Thus, the Program Comment’s streamlining of federally-supported efficiency and clean energy can aid long-term preservation.

The activities exempted from further review by this proposed Program Comment will also provide numerous direct benefits to people and communities. Energy efficiency upgrades to the building envelope and HVAC systems, for example, can improve comfort, health, and overall habitability for occupants, while also reducing energy costs and improving affordability. In turn, supporting ongoing use through timely upgrades can help ensure historic buildings are preserved long-term.

- ***Housing***

Simplifying the review process for rehabilitation of older and historic buildings for housing is an important lever to help address the housing shortage and affordability crisis. As with Climate-Smart Buildings, the proposed Program Comment would smooth the path for more federally supported housing upgrades that improve affordability, energy efficiency, resiliency, and quality of life, while also supporting decarbonization goals.



The program comment should include manufactured and mobile home *replacements* similarly to rehabilitation (not only in emergency situations). This is included in some state agreements such as Idaho's agreement with HUD. Many mobile and manufactured homes (both older and younger than 45 years) were not well constructed and are in too poor shape to be rehabilitated or renovated. The best option for the preservation of the manufactured home communities in which many of these homes are located—and for the low-income residents—is to replace them with new higher quality, more efficient manufactured homes. Several Federal programs at HUD and EPA can help fund such replacements; hence streamlining any Section 106 review will be helpful.

We also note that the draft Program Comment does not directly address conversion of non-residential historic buildings into housing. With growing interest in this type of reuse, we recommend expressly including this activity in relevant sections of the comment. Assuming the exemptions under Appendices A-1 and A-2 are also intended to apply to the rehabilitation and conversion of non-residential historic buildings for housing, we recommend clarifying that explicitly in the appendices.

Consider also adding “battery energy storage systems” to the list of Building Exterior-related activities not requiring further review on non-listed buildings less than 45 years old in the appropriate locations in the appendices. We note that battery energy storage systems are included under “Work Related to the Building Interior” under Appendices A-1 and B-1 and recommend inclusion under “Work Related to the Building Exterior” as well to provide flexibility for buildings where conditions are preferable for outdoor installation of battery storage systems.

- ***Climate-Friendly Transportation***

The proposed Program Comment will help advance projects that deliver important community benefits including improved public health, safety, and quality of life, while helping to decarbonize the transportation sector.



To support additional options to increase walkability, bike access, and other micromobility, we recommend expanding the list of “Other Activities” under APPENDIX C-1 by adding at the end of (5)(a) as follows:

“Leasing, refinancing, acquisition, or purchase by the *federal agency* of:

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iv. Greenway trails or other off-road recreational trails appearing in a land use or transportation plan adopted by a division of government.”

We further recommend that the Advisory Council develop user-friendly tools for federal agency staff to apply the Program Comment and other related prior Program Comments as highlighted under “Prior ACHP Action,” in meeting their Section 106 obligations.

In conclusion, USGBC applauds the Advisory Council on Historic Preservation on this timely and forward-looking Program Comment and we support its swift adoption. Particularly with significant federal funding through the Inflation Reduction Act and other ongoing federal efforts on climate-friendly buildings, housing, and infrastructure, the improved efficiencies created by this Program Comment will have a significant impact on accelerating beneficial projects across the country.

Thank you for considering our input. Please do not hesitate to contact us if you have any questions or if we may be of assistance.

Sincerely,

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