

Rick Gonzalez, AIA
Vice Chairman

Reid J. Nelson
Executive Director, Acting



May 5, 2021

The Honorable Brenda Mallory
Chair
Council on Environmental Quality
1650 Pennsylvania Avenue, NW
Washington, DC 20501

Dear Ms. Mallory:

Acting as chairman of the Advisory Council on Historic Preservation (ACHP) during that position's current vacancy, I am writing to you in your capacity as chair of the White House Environmental Justice Interagency Council (Interagency Council). Specifically, this is in regard to President Biden's directive that the Interagency Council develop recommendations for updating Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations." Established by the National Historic Preservation Act of 1966, the ACHP's mission is to promote the preservation, enhancement, and sustainable use of our nation's diverse historic resources, and to advise the President and the Congress on national historic preservation policy. The ACHP encourages the Interagency Council to address in its recommendations the need to consider how the impact of federal actions on the historic properties of disadvantaged communities contributes to environmental injustice.

There are many examples in which past and current federal programs and projects—or the lack thereof—can disproportionately impact historic properties of importance to disadvantaged citizens, negatively affecting their environment and their emotional and mental health. Highways have been routed through minority or low-income communities and neighborhoods, bifurcating historic districts, destroying historic buildings, and threatening residents' sense of place and identity. Large infrastructure and energy projects with landscape-scale impacts often threaten sacred sites and other properties of religious and cultural significance to Indian tribes, sometimes striking at the very heart of their culture. Past redlining compounded by a current lack of community resources can perpetuate financial underinvestment in marginalized communities, hampering the economic revitalization that results from rehabilitation of blighted older and historic buildings. Economically disadvantaged communities also are limited in their ability to plan for and adapt to climate change, leaving them handicapped in trying to make the places they care about—often historic places—more resilient to climate impacts.

Under the National Historic Preservation Act, the federal government is to be a national preservation leader, manage and care for cultural resources under its control, and foster both nonfederal governmental and private preservation activities. That act states that it is the policy of the federal government to "use measures, including financial and technical assistance, to foster conditions under which our modern society and our historic property can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations" (54 U.S.C. § 300101). Regrettably, this policy has

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not always been equally applied. I hope that the Interagency Council will specifically address the importance of considering impacts to historic properties when working toward environmental justice for America's disadvantaged communities. Doing so will strengthen and make these communities more resilient to both economic and climate change, while ensuring that their rich histories and even their very identity are honored.

The ACHP stands ready to assist the Interagency Council however we can. Should you have any questions or would like to discuss this further, please feel free to contact me, or your staff may wish to follow up with acting ACHP Executive Director Reid Nelson at rnelson@achp.gov. Thank you.

Sincerely,



Rick Gonzalez, AIA
Vice Chairman