

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 Ave., NW  
Washington, DC 20501

Ms. Shalanda D. Young  
Director (Acting)  
Office of Management and Budget  
1650 Pennsylvania Ave., NW  
Washington, DC 20503

Ms. Gina McCarthy  
National Climate Advisor  
The White House  
1600 Pennsylvania Ave., NW  
Washington, DC 20500

Dear Ms. Mallory, Ms. Young, and Ms. McCarthy:

Acting as chairman of the Advisory Council on Historic Preservation (ACHP) during that position's current vacancy, I am writing to you regarding Executive Order 14008's directive that you jointly publish recommendations on how specified federal investments might be made toward a goal that 40 percent of the overall benefits flow to disadvantaged communities. 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 urges that your recommendations address the potential benefits to disadvantaged communities when federal investments are structured to assist them in preserving historic properties while revitalizing their communities.

Of the areas of federal investment called out in the Executive Order, three are particularly pertinent in this context—energy efficiency; affordable and sustainable housing; and training and workforce development.

- Preserving historic buildings almost always offers environmental and energy savings over demolition and new construction. Weatherization and other energy efficiency interventions at historic buildings in disadvantaged communities is cost effective for residents and also encourages continued use of historic structures that are vital to preserving neighborhood identity and sense of place.
- Older and historic buildings are well-suited to help meet the affordable housing needs of disadvantaged communities. They are a critically important subset of naturally occurring affordable housing, and their rehabilitation typically is cheaper than new construction. Also, older and historic buildings frequently are located in neighborhoods with established infrastructure and access to mass transit. Reuse of such buildings for affordable housing also helps to retain and revive the historic character of neighborhoods and communities.
- There is a shortage of workers in the specialized construction trades often needed for historic preservation projects. Building capacity among workers in the traditional construction trades would bolster local economies, helping to fill vacant jobs. Enhancing traditional trades training opportunities—notably for youth and veterans—would allow people to acquire marketable

knowledge, skills, and abilities that will equip them for good-paying careers. Investing in traditional trades training in disadvantaged communities has the further benefit of equipping people to help revitalize their own neighborhoods, towns, and cities.

The National Historic Preservation Act directs the federal government to be a national preservation leader, manage and care for cultural resources under its control, and foster both nonfederal governmental and private preservation activities. Disadvantaged communities can particularly benefit from the federal government taking these mandates to heart as it seeks to right the wrongs of past underinvestment in those communities. I hope that your recommendations will reflect this.

The ACHP stands ready to assist you 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](mailto:rnelson@achp.gov). Thank you.

Sincerely,



Rick Gonzalez, AIA  
Vice Chairman