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Advisory Council on Historic Preservation Climate Action Plan, 2021

This plan is submitted to the National Climate Task Force and the Federal Chief Sustainability Officer in accordance with Section 211(a) of Executive Order 14008, Tackling the Climate Crisis at Home and Abroad.

ACHP Operations

An independent agency established by the National Historic Preservation Act of 1966 (NHPA, 54 U.S.C. § 3001 et seq.), the mission of the Advisory Council on Historic Preservation (ACHP) is to promote the preservation, enhancement, and sustainable use of our nation's historic resources, and to advise the President and Congress on national historic preservation policy. Under Section 106 of the NHPA, the ACHP reviews federal actions affecting historic properties to ensure historic preservation needs are balanced with federal project requirements.

The ACHP is a small independent agency with 37 full-time equivalent employees. The agency is a tenant at the National Building Museum, a federally owned building located at 401 F Street, N.W., Washington, D.C., that is managed by the General Services Administration (GSA). The size of the ACHP and its location in leased space constrain the agency's ability to address certain climate adaptation issues. As a small agency, the ACHP has very limited purchasing needs and thus is not in a position to use the power of procurement to drive innovation or address resilience against supply chain disruptions. Likewise, as a tenant in leased space, the ACHP does not have the ability to directly control climate adaptation and resilience issues for the building where the agency is housed.

Nevertheless, the ACHP does have climate vulnerabilities for which it can plan and take action. Also, consistent with its mission, the ACHP can assist federal agencies in their compliance with Section 106 of the NHPA as they work toward achieving their own climate adaptation goals.

Agency Policy for Climate Change Adaptation and Resilience

The ACHP is fully committed to combatting the climate crisis, both through addressing its own climate vulnerabilities and by assisting other federal agencies. Consistent with its mission, the ACHP will advise the President and Congress on the importance of addressing the impact of climate change on historic places; and will work to ensure that the federal historic preservation review and consultation process under Section 106 of the NHPA proceeds in an effective and efficient manner for climate-related projects and programs.

Senior Agency Official Responsible for Plan Implementation

ACHP Executive Director
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Priority Adaptation Actions

- Assess climate vulnerabilities and resilience of the ACHP's offices at the National Building Museum. Based on recently released climate averages data from the National Oceanic and Atmospheric Administration, the climate in the Washington, D.C., area is becoming warmer and wetter. The city also is experiencing increased nuisance flooding of the Potomac and Anacostia Rivers due to sea level rise and land subsidence. Fortunately, Federal Emergency Management Agency flood mapping indicates that the ACHP's offices are located in an area of minimal flood risk, and the agency's offices are located on one of the building's upper stories. However, ACHP operations still are potentially vulnerable to the effects of strong storms and high temperatures, particularly regarding potential impacts to utilities. In FY 2021, the ACHP will determine whether the National Building Museum and GSA have undertaken an assessment of the climate vulnerabilities of the building and, in our limited role as a tenant, urge them to take appropriate steps to ensure the long term resilience of the building.
- Address the ACHP's information technology (IT) climate vulnerabilities. Disruption of electrical power due to extreme weather events would impact the ACHP's secure computer room and its climate control conditioned and backup power. Likewise, failure of the building's HVAC equipment due to extreme temperatures would lead to a shutdown of ACHP computing equipment. Also, impacts of extreme weather events on communications transport lines for data and telephony services by the data service provider could result in loss of agency connectivity. All such impacts would result in a disruption of agency operations.

Currently, backup and conditioned power systems are in place to mitigate minor to moderate power disruption events. Most critical agency IT services and applications are cloud-based, reducing the risk of disruption, and agency staff currently has secure connectivity to most IT services remotely. However, full redundancy and off-site backup of all agency critical data and services in the cloud is needed to address major electrical power and HVAC disruption scenarios. Likewise, redundant connectivity lines that can serve as automatic failover in case of connectivity disruption to the primary communications service provider's infrastructure would ensure continued connectivity to critical IT services. These continuity of operations goals will be pursued in FY 2021 and FY 2022 to the extent that resources permit.

- Identify and advance opportunities for the ACHP to advise the Administration and Congress regarding the impact of climate change and adaptation measures on historic places. The ACHP currently is in the process of naming a task force of ACHP members to examine the key intersections between climate change adaptation and historic preservation, and to assess the role that the ACHP can play in advising the Administration and Congress on these matters. The ACHP already has sent correspondence to Administration officials on the cultural resources challenges and opportunities posed by the following key initiatives of Executive Order 14008: creating a civilian climate corps; conserving at least 30 percent of America's lands and waters by 2030 (America the Beautiful initiative); environmental justice; ensuring that 40 percent of key federal investments go to disadvantaged communities (Justice40 initiative); and prioritizing federal programs to support and revitalize the economies of coal and power plant communities. The Council on Environmental Quality has asked the ACHP to participate on the America the Beautiful Interagency Working Group. In that capacity, the ACHP will promote conservation of lands rich in cultural resources, which will

advance both the goals of the initiative and the objectives of federal historic preservation law and policy.

- Work with federal agencies to explore Section 106 program alternatives that could accelerate the deployment of federal projects related to climate change. Program alternatives provide the ACHP with the ability to tailor the standard Section 106 historic preservation review process established in the ACHP's government-wide regulations to meet the needs of a particular federal agency project or program. Program alternatives are established principally by and in collaboration with federal agencies and must include the engagement of key stakeholders and the public. Over the years, program alternatives have provided carefully crafted approaches to improving the efficiency of agency project delivery. They can offer creative solutions that accommodate both federal project needs and stewardship of the nation's historic properties. Clean energy and transmission projects, flood abatement and mitigation, building retrofitting, projects that assist with community adaptation and resilience efforts, and other climate change adaptation projects are all potential candidates for Section 106 program alternative development. In FY 2021 and beyond, the ACHP is committed to working with federal agencies in developing program alternatives to create efficiencies in the Section 106 review of climate adaptation processes.
- Develop a plan for actions the ACHP and other federal agencies might take to address and to assist Indian tribes and Native Hawaiian organizations (NHOs) in addressing climate impacts to sacred sites and other historic properties of significance to them. The plan will also outline specific steps the ACHP can take to advance the protection of tribal and Native Hawaiian sacred sites in its oversight of the Section 106 process. These might include program alternatives and sample protocols for federal agency collaboration with Indian tribes or NHOs regarding sustainable management of traditional cultural landscapes. The ACHP will solicit input on the plan from other relevant federal agencies as well as Indian tribes and NHOs.

The ACHP looks forward to implementing this plan and participating in the government-wide efforts to addressing the climate crisis.