



ACHP CLIMATE CHANGE AND HISTORIC PRESERVATION POLICY STATEMENT

DRAFT – 2/15/2023

America’s historic properties—important places that help to define and connect people to their communities—are experiencing escalating climate impacts that are increasingly leading to their damage and destruction. The Advisory Council on Historic Preservation (ACHP) has developed this policy statement to define more clearly connections between climate change and historic properties, to articulate policy principles the ACHP will integrate into the Section 106 process, and to guide public-serving institutions on how they may plan for, mitigate, and adapt to climate change impacts on historic properties.

SCOPE OF THE PROBLEM

In 2014, the Union of Concerned Scientists released an important report, *National Landmarks at Risk: How Rising Seas, Floods, and Wildfires Are Threatening the United States’ Most Cherished Historic Sites*. Through a series of case studies illustrating climate change impacts to well-known historic places (many of them federally owned and managed), the report concluded that:

Many of the United States’ iconic landmarks and heritage sites are at risk as never before. Sea level rise, coastal erosion, increased flooding, heavy rains, and more frequent large wildfires are damaging archaeological resources, historic buildings, and cultural landscapes across the nation. From sea to shining sea, a remarkable number of the places where American history was made are already under threat. The geographic and cultural quilt that tells the American story is fraying at the edges—and even beginning to be pulled apart—by the impacts of climate change.

While that report focused on “iconic” sites, all kinds of historic buildings and neighborhoods, archaeological sites, tribal sites and resources, and culturally important landscapes and places throughout the country (collectively, “historic properties”) are at risk from a broad range of potential climate impacts, including sea level rise; extreme weather events; increased wildfires; drought; melting permafrost and erosion; and temperature changes. These impacts threaten not only historic properties but also the flora and fauna associated with historically and culturally important places. The loss of or damage to historic properties from such climate impacts can irrevocably change a community’s sense of place and erode people’s sense of personal identity and cultural stability.

Among the historic properties affected by climate change are sacred sites, landscapes, and other properties of religious and cultural significance to Indian tribes and Native Hawaiian organizations (NHOs). These historic properties frequently are inseparable from the natural landscape and reflect a symbiotic relationship between nature and culture that is increasingly threatened by climate change. As described in the 2021 *Status of Tribes and Climate Change Report* by the Status of Tribes and Climate Change Working Group:

Tribes have long faced many challenges in protecting and preserving [Tribal cultural resources], including from the multiplying effects of climate change. From the erosion of ancient burials out

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637

Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

of coastal bluffs on the Pacific coast to the disruption of habitats and life cycles for traditional subsistence foods and medicines in the Great Plains and the weathering and loss of ancient petroglyphs and pictographs in the Southwest, climate change is threatening Tribal cultural resources ranging from tangible archaeological sites to intangible cultural beliefs and values.

Listening sessions and other outreach efforts with Indian tribes and NHOs regarding climate impacts have helped to shape this policy statement and underscore the severity of these impacts.

It also is important to acknowledge the often disproportionate impact of climate change on disadvantaged and underserved communities. These communities generally are limited in their ability to plan for and adapt to climate change, and thus may be constrained in addressing impacts on historic properties.

ROLE OF THE FEDERAL GOVERNMENT

The ACHP, an independent federal agency created by the National Historic Preservation Act (NHPA), works to promote the preservation, enhancement, and sustainable use of our nation's diverse historic resources. It is the ACHP's responsibility to "advise the President and Congress on matters relating to historic preservation, recommend measures to coordinate activities of federal, state, and local agencies and private institutions and individuals related to historic preservation, and advise on the dissemination of information pertaining to those activities" (54 U.S.C. § 304102). The ACHP has developed this policy statement in keeping with this mandate.

In accordance with the NHPA, the federal government is to be a national preservation leader, manage and care for historic properties under its control, and foster both nonfederal, governmental, and private preservation activities. Section 110 of the NHPA (54 U.S.C. §§ 306101-306107; 306109-306114) sets out the broad historic preservation responsibilities of federal agencies and is intended to ensure that historic preservation is fully integrated into their ongoing programs. Section 106 of the NHPA (54 U.S.C. § 306108) requires federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties. As the ACHP issues the regulations (36 C.F.R. Part 800) that guide federal agencies in completing review of federal projects under Section 106, this policy statement applies to the consideration of climate change issues during Section 106 reviews. Climate change adds new challenges to fulfilling federal responsibilities under the NHPA and calls for creative approaches.

INTENDED AUDIENCE

Given the leadership role of the federal government in addressing both climate impacts and historic preservation, the following policy principles seek to promote informed federal decision making and responsible stewardship of historic properties. The ACHP also has designed this policy statement to assist community groups, nonprofit organizations, and tribal, state, and local governments (collectively, along with federal agencies, "public-serving institutions") as they seek to address the impacts of climate change on historic properties important to the people they represent.

POLICY PRINCIPLES

Gathering Information

- **Public-serving institutions should work collaboratively to assemble information about previously designated or documented historic properties and to identify previously undesignated or undocumented historic properties, with priority on areas with the highest potential for climate impacts.** We cannot protect historic properties if we do not know where and what they are. Climate change effects can be felt anywhere, and thus public-serving institutions should establish the long-term goal of assembling accurate, georeferenced information about historic

properties, known and unknown, wherever they are. In the near term, public-serving institutions should prioritize surveying known and unknown historic properties in areas where severe impacts to historic properties can be readily anticipated, particularly where there has been little previous survey for historic properties or where an existing survey is outdated. Often, these priority areas include disadvantaged and underserved communities that may previously have received limited attention and that may lack resources to undertake surveys of their own. Consistent with their missions and authorities, federal agencies should both prioritize the survey and identification of federal historic properties threatened by climate change and—through funding and technical assistance—encourage tribal, state, local, and nongovernmental survey efforts. In the process of conducting these surveys and documenting tribal sites and resources, federal agencies should act in accordance with the confidentiality provisions of Section 304 of the NHPA (54 U.S.C. § 307103).

- **When planning to address climate impacts on historic properties, public-serving institutions should seek out and incorporate adaptation and mitigation strategies grounded in Indigenous Knowledge.** Indian tribes and NHOs possess a body of observations, oral and written knowledge, innovations, practices, and beliefs developed through interaction and experience with the environment. The expertise embodied by such Indigenous Knowledge can be critically important to the development of climate change adaptation and mitigation strategies. Obviously, Indigenous Knowledge should be considered when addressing climate impacts on historic properties of direct concern to Indian tribes and NHOs. However, Indigenous Knowledge also can contribute to developing climate-related strategies for other historic properties, as when Indigenous Knowledge of wildfire management can assist in making areas and communities more resilient to wildfire threats.

Planning for Climate Change

- **Public-serving institutions should consider impacts to historic properties as an integral part of climate-related planning and implementation.** Governments—federal, tribal, state, and local—and other public-serving institutions are working to prepare for and adjust to both current and projected impacts of climate change. To ensure that effects to historic properties are not overlooked, thus making them more difficult to later address, public-serving institutions must proactively account for historic properties during climate change planning and implementation activities. Doing so not only serves to help protect historic properties, but also supports other aspects of public agency missions and community priorities that benefit from the continued preservation of historic properties.
- **Public-serving institutions should consider impacts to historic properties as an integral part of disaster preparedness and response.** While some climate change impacts, such as sea level rise, progress gradually, others, such as wildfires and extreme weather events, present immediate natural hazards. Plans for disaster preparedness and disaster response should assess the vulnerability of historic properties, delineate actions to help reduce or avoid disaster impacts on historic properties, and explain how such properties will be treated during post-disaster recovery efforts. Federal disaster assistance programs should encourage and incentivize tribal, state, and local governments to incorporate such considerations into disaster preparedness and response planning.
- **Public-serving institutions serving communities experiencing climate change-related migration, including community-driven relocation of entire communities, should address the impacts of such migration on historic properties in their planning strategies.** Adapting to the changing climate will in some cases mean population shifts into, out of, and within communities, resulting in a number of possible impacts to historic properties. Historic properties in less risky areas may experience population increases, and consequentially, development pressures. Historic properties in risk-prone areas may experience population decreases, including the displacement of residents with long-standing ties to the area. In extreme situations, entire populations of communities may choose to

relocate to escape climate impacts, triggering difficult choices regarding the abandonment or possible relocation of historic properties. Considering such migration-based effects during climate adaptation planning is critical to reducing negative effects.

Climate Change Mitigation

- **Public-serving institutions should contribute to decarbonization by promoting reuse of older and historic buildings and by encouraging the retrofit of such buildings to improve operational energy efficiency.** About 39 percent of global carbon emissions come from the construction and operation of buildings. This impact can be reduced by reusing existing buildings, thus avoiding the embodied carbon emissions inherent in new construction. Likewise, operational carbon emissions can be reduced by making buildings more energy efficient. Since approximately 40 percent of America’s building stock is at least 50 years old, it is critical that the reuse and energy retrofit of older and historic buildings be a fundamental priority. Federal, tribal, state, and local governments should lead by example through the management of the older and historic buildings in their real estate portfolios and encourage private sector action through funding and other incentives. As part of portfolio management decision making, consideration should be given to using full life-cycle accounting to value the embodied carbon in historic buildings versus new construction in order to facilitate fact-based decision making. In addition, government standards and programs that promote the rehabilitation of historic properties should be assessed to ensure that they align with climate mitigation and adaptation goals, that they facilitate a variety of modern uses, and that they encourage implementation of energy efficiency measures.
- **Development of clean energy projects and climate-friendly transportation infrastructure projects should be expedited through efficient and effective permitting processes and environmental reviews (including Section 106 reviews), while still ensuring full consideration of potential impacts to historic properties.** Reducing climate change will require significant investment in large-scale clean energy projects—such as solar farms, wind farms, hydropower plants, geothermal plants, new and expanded transmission facilities, and mining of key minerals needed for clean energy technologies—and smaller-scale distributed generation projects, such as rooftop solar panels, that generate electricity at or near where it will be used. Climate-friendly transportation infrastructure projects—including rail, bus rapid transit, bicycle infrastructure, and pedestrian infrastructure—also are critical to climate change mitigation, since the transportation sector is responsible for more greenhouse gas emissions than any other sector of the American economy. Environmental reviews and permitting processes for these types of important projects, especially those with minimal and small-scale impacts, should be managed to proceed expeditiously. However, potential adverse effects to historic properties must be carefully addressed. Of particular concern, such projects (particularly those with landscape-scale impacts) can threaten sacred sites and other properties of religious and cultural significance to Indian tribes and NHOs, sometimes striking at the very heart of their cultures. During Section 106 review of clean energy projects and climate-friendly transportation infrastructure projects, federal agencies should explore use of program alternatives to tailor and expedite the review process while at the same time ensuring the consultation process is accessible, meaningful, and transparent to the wide variety of consulting parties and stakeholders.

Equity

- **Public-serving institutions should recognize that historic properties important to disadvantaged and underserved communities may be disproportionately affected by climate change and that such communities often are ill-equipped to undertake needed interventions.** Disadvantaged and underserved communities tend to lack the economic and political capital to plan for and adapt to climate change. Many also are particularly susceptible to the physical impacts of climate change. For example, low-income residents and people of color disproportionately reside in flood-prone urban areas. Such constraints may handicap disadvantaged and underserved communities trying to make the

places they care about—including historic properties—more resilient to climate impacts. Public-serving institutions should recognize and seek to address this problem by helping those affected identify their historic properties, assess their community’s vulnerability, and develop strategies to balance appropriate adaptation and mitigation responses with the need to preserve their community identity and sense of place.

- **Federal, state, and local government entities that oversee planning, permitting processes, and environmental reviews (including Section 106 reviews) for climate adaptation and climate mitigation projects should consult regarding historic properties with Indian tribes, NHOs, and disadvantaged and underserved communities, and capacity building options should be explored for supporting their participation in consultation.** The Section 106 process under the NHPA already requires federal agency consultation with Indian tribes, NHOs, and other consulting parties. Here, the ACHP reiterates that consultation is necessary and important to ensuring climate adaptation and mitigation projects address impacts to historic properties of importance to Indian tribes, NHOs, and disadvantaged and underserved communities. Soliciting and considering their views should be done proactively, early in planning, and throughout environmental reviews and permitting processes. In some cases, limited resources may constrain their active participation in consultation. Federal, state, and local government entities should consider options for strategic investments to assist with needed capacity building. The ACHP previously has recommended capacity-building support for consulting parties pursuant to the agency’s “Guidance on Assistance to Consulting Parties in the Section 106 Review Process.” Since many Indian tribes have been incorporating consideration of climate change into their environmental reviews and permitting processes for decades, climate-related project planning should seek to adopt or align with existing practices and standards, where feasible.

Flexibility

- **The federal government should expand and more flexibly apply its guidance on the treatment of historic properties threatened by climate change.** Federal standards significantly influence the rehabilitation of historic properties, public and private alike, because they are often adopted or adapted by state and local governments and referenced in private party actions (such as preservation easements). The federal government should accelerate the development of additional guidance for acceptable treatments of historic properties facing climate risks. The guidance should extend beyond flooding to the broad range of climate impacts, should incorporate the latest technological innovations and material treatments, and should increase flexibility in retrofitting properties to be more resilient while preserving their historic character as much as possible. Likewise, the National Flood Insurance Program should be reviewed to explore how the program might further encourage the modification or relocation of historic buildings to enhance their resiliency.
- **Public-serving institutions should develop sensitive and creative solutions to help communities accept and contend with the reality that many historic properties will have to be altered if they are to survive climate change, and many others inevitably will be lost to climate impacts.** Interventions to protect historic properties from climate impacts or reduce such impacts may necessitate changes to the properties or their surroundings that are less than ideal. Such actions, while saving the properties from loss, may result in negative effects. Public-serving institutions should start talking more openly about these issues, should guide communities in how to triage priorities regarding what properties to surrender to climate destruction, and should develop sensitive and sensible strategies to help residents deal with such losses.
- **Consideration of alternatives during environmental review of climate-related projects, including during Section 106 review, should be approached flexibly to promote development of nimble, innovative, and expeditious ways to protect historic properties.** Section 106 review and

other environmental reviews provide structured processes for exploring alternatives to avoid or minimize any adverse impacts of climate adaptation and mitigation projects. Since the evolving climate crisis poses new and complex challenges for the protection of historic properties that need to be addressed on an increasingly accelerated timeline, it is important that consideration of alternatives be rooted in flexibility and creativity.

Education

- **Public-serving institutions, and especially governments, should train employees regarding climate change impacts on historic properties.** Given the scope and magnitude of the climate change effects that federal, tribal, state, and local governments must address, it is understandable that impacts to historic properties may not be prioritized as highly as some other issues. However, it is critical that there be awareness of such impacts and of the importance of addressing them. Raising awareness through proactive training of government staff is essential. The ACHP and other federal agencies also should increase their understanding of relevant international approaches to protecting historic properties from, and adapting them to, climate change.
- **Public-serving institutions should educate the public about climate change impacts on historic properties and what can be done to address them.** The general public needs to be aware of the worldwide climate-related threats to historic properties and the adaptation and mitigation options that might help to address those threats. Consciousness raising efforts are needed. Likewise, there needs to be outreach to explain how environmental review processes, including Section 106 review, provide opportunities for the public to comment on the climate dimensions of projects as they arise. Such educational efforts are important to help ensure the public can effectively advocate for protecting historic properties of importance to them.

Collaboration

- **Cooperative efforts across agencies, between levels of government, and within communities are critically important.** The impacts of climate change on historic properties are so wide-ranging and potentially severe that collaboration among public-serving institutions, including federal, tribal, state, and local governments, community groups, and nonprofit organizations, is essential. Cooperation and forging of partnerships will enhance implementation of each of the principles discussed above. Federal agencies can take a leadership role in this regard through their own collaborative work and by encouraging such work through funding and technical assistance.

GLOSSARY

- **Adaptation:** Adjustment in natural or human systems to a new or changing environment that exploits beneficial opportunities or moderates negative effects. (*U.S. Global Change Research Program Web Site Glossary*)
- **Climate change-related migration:** Migration that can be attributed largely to the slow-onset impacts of climate change on livelihoods owing to shifts in water availability and crop productivity, or to factors such as sea level rise or storm surge. (*White House Report on the Impact of Climate Change on Migration, 2021*)
- **Community-driven relocation:** Moving a community or portions of a community away from a hazard prone area to a new location with lesser exposure to hazards or their impacts. (*Department of Housing and Urban Development's Climate Resilience Implementation Guide: Community Driven Relocation, 2022*)

- **Historic property:** Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria. (*Protection of Historic Properties, 36 CFR Part 800*)
- **Mitigation:** Measures to reduce the amount and speed of future climate change by reducing emissions of heat-trapping gases or removing carbon dioxide from the atmosphere. (*U.S. Global Change Research Program Web Site Glossary*) [To avoid confusion, this policy statement does not employ the term “mitigation” as used in the context of Section 106 review, where it means reducing the severity of a project’s adverse effects to historic properties.]
- **Resiliency/resilient:** A capability to anticipate, prepare for, respond to, and recover from significant multi-hazard threats with minimum damage to social well-being, the economy, and the environment. (*U.S. Global Change Research Program Web Site Glossary*)