

**Advisory Council on Historic Preservation
Environmental Justice Strategic Plan
Pursuant To Executive Order 14096**

Contents

Introductory Message by Reid Nelson and Chair Bronin 3

Executive Summary 3

Mission Statement..... 3

Vision Statement on Environmental Justice 4

Approach to the Advancement of Environmental Justice..... 4

Advancing Environmental Justice Through Goal-Setting 6

 Environmental Justice Goals/Objectives/Strategies/Metrics 6

Meaningful Engagement and Consultation on the Development of the Environmental Justice Strategic Plan 9

Introductory Message by Reid Nelson and Chair Bronin

[This section will contain the Executive Director Mr. Reid Nelson and Chair Bronin’s introductory message.]

Executive Summary

Since the passage of the National Historic Preservation Act in 1966, the ACHP has promoted the preservation, enhancement, and sustainable use of the nation’s historic resources as its primary mission. To fulfill this mission, the ACHP has implemented regulatory practices and policies that support, and have the potential to further support, environmental justice. In this strategic plan, the ACHP renews its commitment to the meaningful engagement with all Americans regarding human health and the environment by acknowledging the impacts of climate change and environmental stressors, especially as they relate to disadvantaged and underserved communities, as well as communities with environmental justice concerns. The ACHP further commits to acknowledging and accounting for environmental justice and any potentially adverse impacts of its policymaking, guidance, training and outreach as it pertains to such communities.

The ACHP is the independent federal agency responsible for overseeing the federal historic preservation review process established by Section 106 of the National Historic Preservation Act (NHPA) of 1966. Section 106 requires federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties and allow the ACHP the opportunity to comment. In addition, the passage of the National Environmental Policy Act (NEPA) of 1969 expanded environmental reviews and established environmental protection as a federal policy.

Regulations issued by the ACHP specify actions federal agencies must take to meet their legal obligations under the Section 106 process. The Section 106 process governs tens of billions of dollars of federal investments and 120,000 federal agency actions annually – in turn affecting the nation’s housing supply, infrastructure development, homeland security, and land conservation initiatives, among others. As such, the Section 106 review process has sweeping impacts on communities and people across the country. The ACHP is committed to improve its understanding of the impacts of that review process on disadvantaged and underserved communities, and communities with environmental justice concerns.

The following strategic plan acknowledges the ACHP’s past achievements and creates new goals in the areas of policy development and advancement, training and guidance, engagement with Indian Tribes, Native Hawaiians, and other Indigenous Peoples, public outreach, and interagency cooperation pursuant to Executive Order 14096 *Revitalizing Our Nation's Commitment to Environmental Justice for All*. The ACHP has developed several objectives and strategies that support the integration of environmental justice into mission critical areas and across agency offices.

The ACHP will track progress towards meeting its goals by establishing baseline data, where possible, and compiling that data for incorporation into annual implementation reports. The ACHP invites stakeholders and members of the public to review the Environmental Justice Strategic Plan and its annual reports to offer input on efforts to achieve each goal.

Mission Statement

The Advisory Council on Historic Preservation (ACHP) promotes the preservation, enhancement, and sustainable use of the nation’s diverse historic resources, and advises the President and Congress on national historic preservation policy.

In furtherance of that mission, the ACHP's agency Strategic Plan includes the following Cross-Cutting Objective:

While encouraging efficiencies, collaboration, and consultation, strive to ensure that the national historic preservation program reflects the full American story, engages all constituencies and ethnic communities, promotes equity, and benefits the public.

Vision Statement on Environmental Justice

A nation where all Americans, irrespective of their community or background, benefit equitably from the conservation of our historic heritage, in ways that respect and reflect our diverse histories and contribute to healthy, sustainable communities.

Approach to the Advancement of Environmental Justice

Planned Actions

The ACHP intends to advance environmental justice through its oversight of federal project review under Section 106 of the National Historic Preservation Act, the implementation and advancement of ACHP policy statements, and the strengthening of Tribal consultation with Indian Tribes and Native Hawaiian Organizations.

The federal review process under Section 106 is an important planned action that supports the preservation of America's historic resources. The agency's Office of Federal Agency Programs oversees the ACHP's participation in Section 106 reviews, develops and implements program improvement initiatives, provides technical assistance and guidance for Section 106 users, and works to improve federal agency and stakeholder understanding of Section 106. Training and guidance are critical to the agency's impact on internal and external parties who participate in the Section 106 process. To fulfill this Environmental Justice Strategic Plan, the agency intends to bolster its existing training portfolio by developing environmental justice courses and/or components for Federal Preservation Officers (FPOs), State Historic Preservation Officers (SHPOs), Indian Tribes and Native Hawaiian Organizations (NHO), other consulting parties, and the public.

In its advisory capacity, policy statements and guidance are integral to the ACHP's mission and provide direction and information for government agencies, non-governmental organizations, and the public regarding the Section 106 process and the societal benefits of promoting the preservation of historic properties. The agency's Office of Policy and Legislative Affairs develops preservation policy recommendations, analyzes legislation proposed at the federal/state/local levels and Executive Branch policy initiatives, and participates in ACHP programs and research related to major national preservation issues. To fulfill this Environmental Justice Strategic Plan, the ACHP intends to strengthen its policy program through a commitment to consider environmental justice during policy and guidance development, implementation and advancement.

Strengthening consultation with Tribal, Native Hawaiian, and other Indigenous peoples is an important component of the ACHP's responsibilities. The Office of Tribal and Indigenous Peoples (OTIP) advises the ACHP leadership and staff on policy and program matters related to Indigenous issues and offers technical assistance and outreach for Tribal and Native Hawaiian Organization consultation under the Section 106 review process. The agency will incorporate environmental justice issues into its OTIP related programs and responsibilities by studying its current data collection and tracking procedures to establish baseline metrics for Tribal consultation and adverse effects reporting within the Section 106 process.

The ACHP supports its communications through its Office of Communications, Education, and Outreach, which creates and conveys the ACHP's message to partners, stakeholders, and the general public via print and electronic media, meets information requests from citizens and Congress, handles media relations, and manages ACHP outreach, awards and publications. The agency will advance its commitment to environmental justice by enhancing the components of its outreach program dedicated to preservation and environmental justice issues.

Recent Past Actions

[INSERT STATEMENT FROM OFAP (past actions)]

[INSERT STATEMENT FROM OCEO (past actions)]

OTIP's Past Actions

In 2003-2024, OTIP has supported and facilitated the ACHP's development, adoption, and implementation of two policy statements that address Indigenous Knowledge and treatment of burial sites.

ACHP Policy Statement on Indigenous Knowledge and Historic Preservation (2024)

The field of historic preservation should ensure that the archaeological sites, historic structures, cultural landscapes, sacred sites, and other sites of religious and cultural importance to Indian Tribes, Native Hawaiian organizations (NHOs), and other Indigenous Peoples are equitably considered in decision making. This policy statement provides a set of principles to support the incorporation of Indigenous Knowledge in historic preservation contexts.

ACHP Policy Statement on Burial Sites, Human Remains, and Funerary Objects (2023)

Burial sites, human remains, and funerary objects have intentionally and unintentionally been damaged, destroyed, or desecrated by public and private developments. This policy statement, intended to be incorporated into Section 106 reviews and state and local guidance, emphasizes not disturbing sites, when possible, consultation and deference to descendant communities, and continued educational efforts on these issues. The ACHP acknowledges the impact of climate change on burial sites across the nation, and is currently seeking data and feedback in an effort to advance implementation of the policy.

OPLA's Past Actions

In 2023, OPLA supported and facilitated the development, adoption, and implementation of two policy statements that establish principles related to climate change and housing. They reference and are predicated on respect for consultation with Indian Tribes and other indigenous people, as well as meaningful engagement with disadvantaged and underserved communities, and communities with environmental justice concerns. The office is currently working on implementation methods for each of the policy statements.

ACHP Policy Statement on Housing and Historic Preservation (2023)

Communities across America are experiencing housing shortages, especially shortages of affordable housing. The Policy Statement on Housing and Historic Preservation promotes federal, state, and local action to rehabilitate historic buildings for housing and accelerate permitting and environmental review, including Section 106 review. The policy contains thirteen principles, including support for programming by public-serving institutions that assist homeowners (particularly lower- and middle-income homeowners) and small-scale landlords in maintaining, repairing, and weatherizing their historic homes,

and reducing their energy costs through renewable energy installation. In addition, the policy acknowledges that expediting the development of housing projects through efficient and effective permitting processes and environmental reviews while still ensuring full consideration of potential impacts to historic properties may help alleviate housing shortages.

ACHP Policy Statement on Climate Change and Historic Preservation (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. This policy statement addresses how climate change affects historic properties, articulates principles the ACHP will integrate into Section 106 reviews involving climate issues, and advises public-serving institutions on how they may research, plan for, mitigate, and adapt to climate change impacts on historic properties. It acknowledges the importance of engagement with disadvantaged and underserved communities, and communities with environmental justice concerns. The policy contains fifteen principles, in the areas of information gathering, planning for climate change, climate change mitigation, equity, flexibility, education and collaboration.

Advancing Environmental Justice Through Goal-Setting

Environmental Justice Goals/Objectives/Strategies/Metrics

The ACHP has developed four environmental justice goals related to its regulatory oversight, its advisory capacity, engagement with Indian Tribes, Native Hawaiians, and other Indigenous Peoples, public outreach, and interagency support. The ACHP proposes the following four goals, along with their relevant objectives, strategies, and metrics:

I. Ensure that Environmental Justice Impacts are Identified and Addressed Through the Effective Section 106 Review of Undertakings

Issue Statement: Staff and external practitioners with or without knowledge of environmental justice issues would benefit from training and/or guidance in their functional areas and would benefit from opportunities to increase awareness.

Objective 1.1: Expand the knowledge of staff and practitioners by incorporating environmental justice into the Section 106 review process through internal and external training.

Strategies:

- A. Expand internal knowledge and expertise regarding environmental justice issues by developing and implementing internal staff training.
- B. Expand external knowledge and expertise by developing and implementing an environmental justice component for the agency's existing Section 106 instruction courses for practitioners.
- C. Expand external knowledge and expertise by developing and implementing training that supports FPOs, SHPOs, NHOs, Tribes, other consulting parties and the public.

Objective 1.2: Expand guidance issued to agencies to provide information about and clarify obligations related to environmental justice responsibilities.

Strategies:

- A. Encourage agencies to identify, analyze, and address disproportionate and adverse human health and environmental effects and hazards of federal undertakings they carry out, license, or assist, and share that information with the ACHP.
- B. Collaborate internally on the development of policies and/or guidance that couple the environmental benefits of historic preservation with the urgency of environmental justice to support the development of new policies and initiatives.

Outcome: The results of Goal 1 objectives include streamlining the ACHP’s consideration of environmental justice by training and preparing internal staff across the agency’s offices. The objectives would assist in standardizing outcomes and expectations across FPOs, SHPOs, NHOs, Tribes, other consulting parties, and in the eyes of the public.

Metrics:

- a. % of class participants who receive environmental justice training in the current Section 106 offerings (short-term)
- b. % of class participants who report back implementation in their day-to-day work (short-term post-class surveys)
- c. % of class participants who report “positive” results from implementation in their day-to-day work (long-term post-class surveys)

II. Ensure that Environmental Justice Impacts are Identified and Addressed During Development and Advancement of ACHP Policies

Issue Statement: Part of the ACHP’s mission is to promote the preservation and sustainable use of the nation’s historic resources. The ACHP issues policy statements designed to not only assist partner agencies and the public with the interpretation of regulations, but to establish the agency’s objectives and goals. The ACHP will ensure that environmental justice impacts are identified and addressed during the development and advancement of its policies.

Objective 2.1: Advance the implementation of environmental justice-related principles in the ACHP’s existing policy statements, particularly the following that have been most recently adopted:

- i. the ACHP Policy Statement on Climate Change and Historic Preservation;
- ii. the ACHP Policy Statement on Indigenous Knowledge and Historic Preservation;
- iii. the ACHP Policy Statement on Housing and Historic Preservation; and
- iv. the ACHP Policy Statement on Burial Sites, Human, Remains, and Funerary Objects.

Strategies:

- A. Develop guidance for federal agencies that supports the implementation of environmental justice-related principles addressed in agency policy statements.
- B. Consider and address environmental justice in the development of program alternatives for streamlining Section 106 review in accordance with the above policy statements.

Outcome: The results of Goal 2 objectives include clarification of the ACHP’s position in consideration of environmental justice and a streamlined approach to addressing

environmental justice challenges faced by FPOs, SHPOs, NHOs, Tribes, other consulting parties, and the public.

Metrics:

- a. No. of effective guidance documents developed over the plan period.
- b. No. of program alternatives that include consideration of environmental justice.
- c. % increase in effective guidance documents developed over the plan period.

III. Promote the Participation and Engagement of Indian Tribes, Native Hawaiians, and other Indigenous Peoples, and Communities with Environmental Justice Concerns

Issue Statement: The NHPA charges the ACHP with the encouragement of public interest and participation in historic preservation. The ACHP will examine methods to minimize barriers to participation in the Section 106 process for communities with environmental justice concerns.

Objective 3.1: Identify, notify, and afford communities with environmental justice concerns the opportunity for meaningful engagement, comment and participation in the Section 106 process.

Strategies:

- A. Expand external knowledge and expertise of the public by implementing an environmental justice training course focused on the Section 106 process.
- B. Revise existing guidance to encourage federal agencies to more widely use their discretionary power to expand the pool of potential consulting parties.
- C. Expand outreach via social media, the website and other communications with communities to clearly state the role of individuals and organizations in the Section 106 process.

Outcome: The results of Goal 3 objectives include an increase in the identification and involvement of environmental justice communities in the Section 106 process and an increase in communication with and education of members of the public sensitive to environmental concerns.

Metrics:

- a. % increase in targeted environmental justice communications

IV. Engage with Agencies to Provide Guidance on the Consideration of the Cumulative Impacts of Decisions/Mitigation Strategies

Issue Statement: The ACHP is charged with reviewing the policies and programs of federal agencies and the provision of guidance associated with those policies and programs. Developing guidance to assist federal agencies, SHPOs, THPOs, and consulting parties with identifying projects, programs or activities that might impact communities with environmental justice concerns is paramount to the organization's mission.

Objective 4.1: Develop new guidance documents and update existing guidance documents for federal agencies, SHPOs, THPOs, consulting parties, and the public that address environmental justice issues.

Strategies:

- A. Establish an internal team consisting of OFAP, OTIP, and OPLA for the development of guidance for federal agencies, SHPOs, THPOs, NHOs, other consulting parties, and the public.
- B. Collaborate and produce or update one to two guidance documents within the planning period.
- C. Create an interagency task force or consider joining existing task forces to align historic preservation benefits with environmental justice goals.

Outcome: The results of Goal 4 objectives include a more involved advisory relationship with federal agencies, SHPOs, THPOs, NHOs, and other consulting parties.

Metrics:

- a. No. of guidance documents issued or expanded within the planning period.

Meaningful Engagement and Consultation on the Development of the Environmental Justice Strategic Plan

[The ACHP will develop an engagement strategy for the plan, which will be detailed here in the final report. The plan shall include engagement strategies targeting Tribes, NHOs, FPOs, SHPOs, other consulting parties and the public.]