



# PROPOSED PROGRAM COMMENT ON ACCESSIBLE, CLIMATE-RESILIENT, AND CONNECTED COMMUNITIES

*Presentation for Tribes/NHOs*



September 2024

# Meeting Attendees

- Leaders of Indian Tribes & Native Hawaiian Organizations
- Tribal Historic Preservation Officers
- Additional Outreach for Public Consultation Meetings:
  - BIA regional climate contacts, USGS climate adaptation science center contacts, American Indian Higher Education Consortium general contacts

# Presentation Order

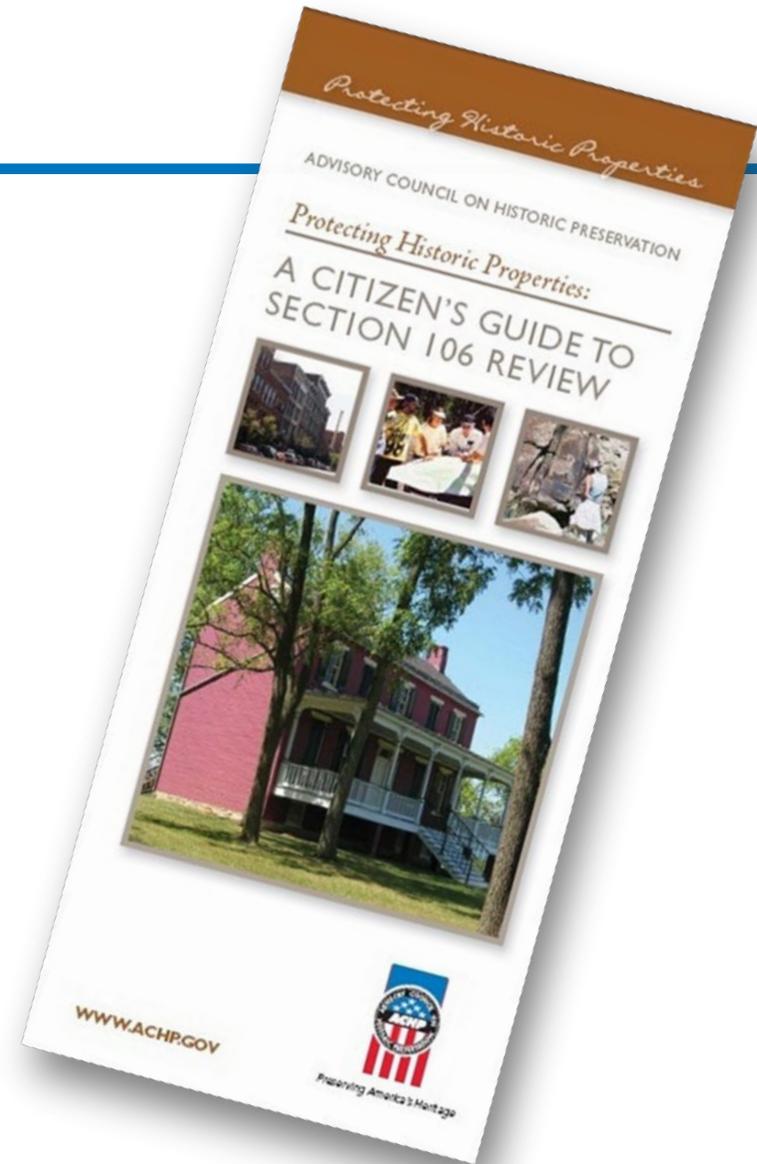
- Background
- Review of the Program Comment
- Inviting Feedback

# Background

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# Section 106

“The head of any federal agency shall, prior to the approval of an undertaking, take into account the effect of the undertaking on any historic property and afford the ACHP a reasonable opportunity to comment with regard to the undertaking.”



# Goal of this Program Comment

- Advance historic preservation goals while expanding access to housing, facilitating climate-resilient and zero-emissions buildings, and promote climate-friendly transportation.
- Key facts:
  - 1/2 of housing units were built before 1979
  - More than 1/3 of greenhouse gas emissions comes from the building sector
  - Buildings use 75% of electricity generated annually
  - 1/3 of emissions come from the transportation sector

# Current Federal Activities

## ■ Housing

- HUD – 1 million housing units across 190,000 public housing buildings, \$9 billion on maintenance
- CDBG & Home Investments – billions
- DoD – 1 million housing units

## ■ Climate-Smart Buildings

- Billions for energy efficiency upgrades in the Inflation Reduction Act, Climate Smart Buildings Initiative, and HUD Green & Resilient Retrofit Program
- DoE Energy Efficiency and Conservation Block Grant Program

## ■ Climate-Friendly Infrastructure

- DoT – pedestrian, bike, and public transportation improvements

# Other ACHP Action

- ACHP has participated in other program alternatives, including:
  - Six program comments related to housing, plus many program alternatives for local public housing authorities
  - Routine operations and maintenance exemption (GSA) and climate resiliency and sustainability nationwide programmatic agreement (DHS)
  - Two program comments related to transportation and electric vehicle exemption, plus many state-specific transportation agreements
- Policy Statements
- Preliminary public comment period

# ACHP Policy Statements on Housing & Climate Change

- June & December 2023
- Recognized preservation can advance housing and climate goals
- Suggested that ACHP consider program alternatives for housing, climate-smart buildings, and climate-friendly transportation



The historic Rosenwald Courts Apartments in Chicago, Illinois, have been rehabilitated to once again provide affordable housing. (Photo courtesy of the project sponsors.)

# Review of the Program Comment

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# Overall Effect

- Program Comment provides an alternate way for federal agencies to comply with their Section 106 responsibilities
- It does not affect other laws, including Tribal laws
- It does not apply to Tribal lands, but a Tribe may authorize the application of it to Tribal lands

# Overall Structure

- Introductory Matter
- Appendix A: Housing
- Appendix B: Climate-Smart Buildings
- Appendix C: Climate-Friendly Transportation

# Relevant Overall Provisions

- Consultation provision
- The use of “qualified authorities”
- Assistance to consulting parties
- Provision on unanticipated discoveries

# Housing *Appendix A*

Encourage the efficient, effective, environmentally-sustainable, and continued use of historic and cultural resources to satisfy the nation's housing needs.



# Climate-Smart Buildings *Appendix B*

Expand the ability of federal agencies to conduct operations and maintenance on their buildings and facilities.



# Climate-Friendly Transportation *Appendix C*

Facilitate the development of multi-modal transportation that enhances the economic and cultural vibrancy of historic neighborhoods.



# Summary Thoughts

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- More consistent treatment of project types will ensure consistent outcomes & enable cross-agency training
- Clear rules will help us deploy current and pending federal investments
- A focus on housing & climate will help us meet community needs for accessible, climate-resilient, and connected communities

# Inviting Feedback

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# Opportunities for Feedback

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- Discussion today
- Submit to [program\\_alternatives@achp.gov](mailto:program_alternatives@achp.gov)
- Reply by October 9



# Thank You

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