Sara Bronin

Sarah Bronin discusses the ACHP's role in historic preservation, covering the Section 106 process, Indigenous knowledge, and climate-resilient projects, emphasizing the connection between preservation and climate adaptation.

Automatic Shownotes

Chapters

Long Summary

In this episode, I am joined by Sarah Bronin, a multifaceted professional serving as an architect, an attorney, and a professor, currently chairing the Advisory Council on Historic Preservation (ACHP). We delved into the critical functions of ACHP, an independent federal agency dedicated to preserving the historic places of our nation. Sarah clarifies that the ACHP operates primarily through two key functions: its regulatory role, ensuring federal agencies consider historic preservation during their projects, and its policy-making function, which aims to strengthen and modernize historic preservation practices across the country. We explore the intricacies of the regulatory processes, particularly the Section 106 review which mandates that federal agencies account for historic properties before undertaking projects. With a staggering 120,000 federal actions subject to this process each year, Sarah outlines how the ACHP relies on federal agencies to fulfill these obligations, intervening only when concerns arise from external stakeholders like Indigenous tribes and local communities. The challenges faced due to limited staff resources are significant, yet the agency navigates complex legislative frameworks to advocate for preservation while managing numerous agency reviews efficiently. In discussing her background, Sarah reveals her passion for historic places and the evolution of her career intersecting law, architecture, and urban planning. She emphasizes the importance of making historic places viable—not just for preservation's sake, but for their continued relevance and accessibility for future generations. Our conversation acknowledges the pressing need for adaptation strategies in historic preservation in the face of climate change, a topic that is increasingly urgent as many historic areas are threatened by rising sea levels, increased wildfires, and

other climate-related impacts. On the topic of climate change and cultural resources, Sarah paints a vivid picture of how historic places, often located near water, are at risk. We discuss the dual challenge of protecting these sites while also utilizing them to contribute positively to climate resilience efforts. She presents an optimistic view: Historic buildings, rich in embodied energy, can be retrofitted for energy efficiency and serve as vital components in community strategies against climate change. We also touch on Indigenous knowledge—an essential aspect that the ACHP is actively integrating into its processes. Sarah shares insights about a recent policy statement adopted by the ACHP that encourages the respect and inclusion of Indigenous perspectives in preservation practices. This includes acknowledging traditional knowledge systems and recognizing their importance in managing historic resources, particularly in areas vulnerable to climate impacts. Another significant point we address is the ACHP's innovative approach to accelerating historic preservation processes through a new program comment that seeks to streamline reviews associated with housing and climate-resilient projects. Sarah explains how this will facilitate faster approvals for essential updates and improvements to historic structures, thereby addressing the broader needs for affordable housing and clean energy initiatives. As our discussion evolves to the future, I raise questions about managing retreat in the context of historic preservation. While there is no established federal policy framework yet, Sarah expresses the need for a comprehensive strategy to guide communities facing unavoidable relocation due to climate impacts. She highlights a lack of integrated mapping tools that hinder our understanding of how climate change affects historic sites across the nation, advocating for targeted investment in data and geographical resources to inform better decision-making. Our conversation wraps up on a positive note, highlighting the potential links between historic preservation and climate adaptation. Sarah shares her vision for fostering stronger interaction between preservation professionals and climate adaptation experts, emphasizing the importance of community1 engagement in these conversations. Listeners are encouraged to explore opportunities for deeper involvement in preservation, as the integration of climate considerations becomes ever more crucial in these discussions. Overall, this episode presents a thorough exploration of the challenges and opportunities within the realm of historic preservation, particularly in light of contemporary climate issues. Through Sarah Bronin's insights and leadership, we see the path forward requires innovation, collaboration, and a dedication to preserving our cultural heritage amidst a rapidly changing world.

Brief Summary

In this episode, I chat with Sarah Bronin, chair of the Advisory Council on Historic Preservation (ACHP), about the agency's role in preserving historic sites. We discuss its regulatory responsibilities, particularly the Section 106 review process, and the integration of Indigenous knowledge into preservation practices. Sarah highlights the ACHP’s initiatives to streamline approvals for climate-resilient projects and the need for strategies addressing community relocation due to climate impacts. This conversation reveals the crucial connection between historic preservation and climate adaptation, emphasizing collaboration and community engagement in these efforts.

Tags

Sarah Bronin, Advisory Council on Historic Preservation, ACHP, preserving historic sites, regulatory responsibilities, Section 106 review, Indigenous knowledge, climate-resilient projects, community relocation, climate adaptation

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Transcript

Welcome Back, Adapters!

[0:02] Hey Adapters, welcome back to a very exciting episode. Joining me is Sarah Bronin. Sarah is an architect, attorney, professor, and also is the current chair of the Advisory Council on Historic Preservation. Hi Sarah, welcome to the podcast. Hi Doug, thanks so much for having me. We're going to cover a lot of ground in this episode, but just first off, can you tell us what the Advisory Council is? Sure. The Advisory Council on Historic Preservation, or ACHP as some people abbreviate us, is the independent federal agency that has as its primary mission the promotion and preservation of the country's historic places. And I always like to tell people that we have two main functions. The first one is regulatory, and that's where most of our staff's efforts are focused. And that regulatory process requires federal agencies to take historic preservation into account when they're doing almost anything. So when they're building a highway, when they are erecting a courthouse, when they are doing substantial digging.

[1:05] Each one of these actions when undertaken by a federal agency is the kind of thing that our process called Section 106, after the provision in the National Historic Preservation Act that originally codified the requirement, All of those actions are subject to Section 106. The regulatory function is, I think, the big thing we do. We're also, though, tasked by Congress in the National Historic Preservation Act with helping to chart a path forward for policies in the federal government that relate to historic preservation. In addition to that, we're supposed to advise state and local governments on policy issues related to historic preservation. And so I think best known by those who've heard of us at all for our regulatory function, but it's that policymaking function that I think is just as important. To be perfectly honest, and I didn't expect to follow up on that question, but I didn't quite get the regulatory aspect of what you do there. So that's great. Regulations are much better than policies. When a situation comes up that you have to enforce something, you obviously don't have a huge staff to do enforcements to all these different agencies. How does that work? So the Section 106 process covers about 120,000 federal agency actions every year.

[2:24] Just to give you a sense of scope, I'm sure some of your listeners are familiar with the National Environmental Policy Act, NEPA, and all that entails. NEPA gets a lot of attention, I would say, in the press, in communities that deal with the federal government. NEPA only covers what the statute calls major federal actions, only about 10,000 agency actions per year. In essence, our regulatory process is a sort of hidden evaluation that happens across a huge number of federal agency actions. And the way it typically works is that the federal agencies know what they're supposed to do because the

statute, the National Historic Preservation Act, sets out their obligations. And we've also adopted regulations, so as an agency can do, for a statute they administer. And our regulations tell federal agencies in even greater detail the way they're supposed to review the impacts of their actions on historic properties. So we really do rely on the federal agencies to do what they're supposed to do for the most part. And that said, we sometimes do hear from Indian tribes, from local communities.

[3:37] From other interested parties that the federal agencies might not be doing everything that they should in a particular case. Those are the kinds of issues that the staff at the ACHP tends to focus on. So we definitely don't have the staff to review 120,000 actions every year. And for the most part, those are going along as they should. We actually see maybe about 200 different federal agency actions that are brought to our attention. And usually the way it works is our staff tries to advise the agencies, tries to work with the consulting parties and help to mediate a resolution to any issues that are raised. It is a vast process that's largely conducted by federal agencies in exactly the manner that Congress intended. And the ACHP gets involved where there's something that might have gone awry. Can you give us just a broad overview of your background? How did you end up in the position you're in there as chair, but who you are? I gave a little bit of an introduction, but can you give us a little bit of that background?

[4:36] So I'm a person that loves historic places. I have always found old buildings fascinating, historic neighborhoods lively and interesting. And I think a lot of people across the country feel the same way. People gravitate towards historic main streets. They gravitate towards older, funky neighborhoods. These are the places that tell our story as Americans and that we need to figure out how to protect, but protect them in a way that makes them viable and would even say useful and beautiful for future generations. My background is I'm an architect and attorney, both just went through many years of school to have both of those degrees and licenses. And I look at places in my academic work. I'm on leave, by the way, from my position as a professor at Cornell University, where I focus on property and land use issues, including historic preservation issues. And all of my research, all of my consulting work, all of my, really my daily thoughts focus on how we can make places that are worthy of living in and help to support the kinds of.

[5:49] In this case, history and my other work, zoning rules and design standards and things like that. But how do we make places both sustainable and accessible and beautiful using the tools that we have? And so my background is, as I said, a law professor and a lawyer, but as an architect too, I really look at the beauty and the utility of our places and the way that in particular buildings interact.

[6:16] One of the things that I found in this role is that a lot of the issues have to do with Indian tribes and Native Hawaiian organizations and concerns by Indigenous peoples. That's an area that I haven't had a lot of background in, and I hope that I've been able to learn a bit on the job on that one and really commit to improving the way our Federal Historic Preservation Agency works. But my background for the most part is really in law, architecture, urban planning, and really the rules of the game that give us the places that we see around us. You must interact with Dr. Linda Shai there at Cornell. Do you know Linda? Linda Shai. Oh, Linda, she's the greatest. Yes. If any of you are not

familiar with Linda Shai's work, that's S-H-I. You should read everything she's ever written. Yes. The faculty on the planning department, which she's a part of, are amazing at Cornell. There's just so many. Victoria Beard leads our Center for Cities. Nick Klein does so much work in transportation.

[7:12] And Nick and Linda, by the way, just got tenure. So for those listeners who have followed one or both of their careers were very much excited about the security that provides for them to do even more exciting work. But I think your listeners probably, if they know her work at all, know her work as it relates to adaptation. She's doing some very interesting scholarship now on adaptation in the New York City region, especially on the ways that maybe some forgotten communities and people who are living in different types of property arrangements like co-ops, which are common in New York City, don't necessarily get access to disaster relief funding. And I think that's going to be, when she publishes that, it's going to be pretty interesting and impactful. Yes, Linda, of course, great scholar. She's almost a semi-regular. She's been on three or four times, so I know Linda relatively well. And I think she just got a fellowship.

Climate Change and Cultural Resources

[8:03] She'll be doing some work in Taiwan for a year or something. I think that's what I read. So good for her. All right. I want to pivot a little bit here. And I've done historic preservation before and cultural heritage, but But just to ground my listeners, let's talk about what does climate change mean for cultural resources? Let's just more broadly, just so they have sometimes be like, what does this really mean for how's climate change going to impact? What is that sort of broad overview?

[8:27] If you think about, maybe your listeners I know are all over the country and all over the world, but think about some of the places where, within your own communities, where you see that historic district, where you see the cluster of historic sites.

[8:40] Lots of them are located, and I'll just start with water, but lots of them are located in and around water. In the D.C. Region where I am, we have, of course, all of D.C., the Potomac is running through it. But nearby, we have Annapolis, which has a very storied historic district that I think at this point floods dozens of times per year because of increased precipitation, because of sea level rise, because historic communities may or may not have had that kind of water management, storm management infrastructure that we may take for granted today. One aspect of that dimension between adaptation and climate change in historic places is the fact that we have so many of our historic places in this country located in areas that are vulnerable to the impacts of climate change. And sea level rise is just one of them. Of course, we have threats of increased wildfire, which we are seeing across the country. And of course, the devastating wildfires go in Lahaina in Maui, killing many people and tearing apart families, but also burning the historic district in Lahaina. Also, as I mentioned, increased precipitation and increased intensity in terms of weather events that may be lower grade but more frequent, causing vulnerable materials like wood to deteriorate more quickly.

[10:04] And I guess overall, actually, the Union of Concerned Scientists did a report about our monuments at risk, including the Statue of Liberty in Ellis Island, to try to raise awareness of this issue a few years ago. So listeners out there, check that report out to really use the icons of American history as a benchmark for the increasing threats. But it's really those threats that are in our communities that I'm most concerned about. At the same time, so let me just put a positive spin on this.

[10:34] Historic properties, including and especially historic buildings, can actually help us mitigate our humans' contributions to climate change. Particularly historic buildings have a lot of embodied carbon in them. They can be retrofitted to be energy efficient, to integrate renewable energy, and can be a source of, we've seen actually in recent years, historic buildings that have been developed as net zero buildings, including the Hotel Marcel in New Haven, which I had a chance to visit since I've been chair of the advisory council. It's a net zero hotel designed by Marcel Breuer, famous architect and abandoned for decades and has been revived to be this uber energy efficient building that uses solar and all of that and natural daylighting to reduce energy costs and so on. So I think just at the same time that we have to focus on adapting our historic places to respond to the threats of climate change, I also see our historic places, including, again, historic buildings especially, as being a source for us to maybe mitigate on the other side.

[11:45] Something I learned, I went to Hawaii recently, Department of Defense brought me there, and I didn't realize this. And so the DOD is really involved with cultural resource preservation and has a lot to do with the bases and such. And you think of cultural resources, you think of actual physical buildings and houses and such like that. But what I learned there, because we were having a lot of South Pacific Island people come in, cultural resources are just like traditions. And sometimes we forget about that and how climate change is going to impact those. And we have our own issues there with our traditional knowledge that's being lost. But can you talk a little bit about that? Because it's not just actual physical things. I love that you raised Hawaii as your example here, because the ACHP has been working to increase respect for indigenous knowledge in our own agency's regulations and policies.

[12:34] And we've also proposed a recent action specific to Hawaii. So just to talk about the first part first, just a few months ago, we adopted for the first time a policy statement on indigenous knowledge and historic preservation. And in that policy statement, we recognized the importance of indigenous knowledge, which some call traditional knowledge, a phrase that you just used, in our understanding as a federal agency of the way we should conduct our own business across the board. We said in that policy statement that Indigenous knowledge was to be respected and embedded at every step of the Section 106 process. And we also encourage state and local governments to look at their own rules to do exactly the same thing. I should also say we found that It would be difficult, if not impossible, for us as a federal agency to define indigenous knowledge, to give it specificity and contours, because we as a federal agency are not holders of indigenous knowledge. What we did in the policy statement was describe it. And the way we described it was similar to what you just said, which is really the system of

beliefs and observations that may be held by indigenous peoples, in part due to their relationship with the environment and knowledge that is kept.

[13:59] Stewarded, and passed on across generations. So again, we didn't really define it, but we described it as very broadly and roughly, as I've just said. With that concept, we've now embarked on the path of trying to figure out how do we embed Indigenous knowledge into our agency's processes. And having visited Hawaii myself as part of a, with the agency's presidentially appointed tribal member, himself, half Native Hawaiian, Chairman Reno Franklin, we went to visit, I visited some sites in Oahu and also toured with FEMA Lahaina. And what grew out of that visit was a proposal that we exempt from the Section 106 process certain exercises of Indigenous knowledge that might have otherwise triggered the Section 106 process and all of the bureaucracy that comes along with it. Our idea in proposing this exemption was to really fulfill what we said we would in the policy statement, which is that Indigenous knowledge deserves respect, and added to that the acknowledgement that a federal agency.

[15:12] Whether us or any of the other federal agencies that are conducting undertaking subject to 106, that we could not ourselves evaluate and understand the what Indigenous knowledge would require when, in that case, a Native Hawaiian organization was working as part of an undertaking by a federal agency to do certain types of activities that would be, again, exercises or understood or informed by Indigenous knowledge. Examples of the kinds of things that we've included in this proposed exemption, which is still being considered by the council now, are certain landscaping practices, certain agricultural practices, the rehabilitation, preservation, restoration, or construction of certain water features and systems, including fish ponds, which are very important to historically to Native Hawaiians and are still important today. We also included adaptation measures, including the adaptation of buildings and structures and sites to respond to climate change. And we called out in that document, sea level rise, precipitation.

[16:21] Erosion, wildfire, and even pollution and invasive species, which in different ways are impacted and exacerbated by climate change. So I think that's something I'm really hoping that the council moves on very soon and that we can use as a starting point to help both, again, through our process And hopefully inspiring others, including states, maybe the state of Hawaii, including other federal agencies

Indigenous Knowledge and Historic Preservation

[16:49] to really dig deeply and try to understand how do we recognize indigenous knowledge. That recognition is a priority of the Biden administration. It's something that I've seen in my time here generate a lot of conversation. And I'm really hopeful that as we integrate that further into federal agencies', work across the board, not just in historic preservation, that Indian tribes and other indigenous peoples can get the respect they deserve.

[17:15] It's been a while, but I lived in Australia for a few years and I worked for a natural resource management group. And they had this cool grant where they went out and working with Aboriginal communities and just did recordings. I don't even think they were using video. I don't think that was appropriate, but they were just getting, because they're oral storytellers and that was all going to be lost. And so even though this was capturing something from the past, I thought it was a really cool project that, yeah, they had people going out to tribal lands and just recording the elders so that it wouldn't be lost because they weren't writing it down and they weren't doing those things. I think we're probably going to do a lot more of that in the coming years because preserving some of the traditions is very difficult. Okay, I want to pivot a little bit here and not actually pivot, but just go back to something that you were talking about. This is, you'd mentioned the policy side of what your agency does. And I think you mentioned this. I don't think you mentioned the specific name, but I'm going to read this script I got here. And so your agency provided a draft program comment on accessible, climate resilient, connected communities aimed at accelerating timelines for historic preservation reviews, a change impacting investments worth billions of dollars. You've talked a little bit about that, but I want to dig into that a little bit more. Can you tell us what that whole thing is? So a program comment is a kind of alternative compliance process for Section 106 that agencies can use where they're authorized to satisfy their responsibilities under Section 106 to take into account the effects of their actions on historic properties.

[18:41] A program comment is something that the ACHP council as a whole votes on. And actually, I haven't talked about the council yet, so let me just do that really quickly. It's 24 members. I am the only full-time member as chair, a presidential appointee, along with 11 total presidential appointees as individuals, including eight public and expert members, as well as a governor, mayor, and tribal member. There are 10 federal agencies that are appointed to the ACHP, including transportation, defense, interior, agriculture, and so on. And then there are three organizational members, the National Trust for Historic Preservation, the National Conference of State Historic Preservation Officers, and the National Association of Tribal Historic preservation officers.

[19:28] So all together, that group of 24 votes on certain things, including policy statements, but they also vote on program comments, one of five types of program alternatives. For this program comment, it is the first one, we have about a couple dozen program comments, that we've adopted since the agency was created in 1966. This is the first one that the ACHP has proposed itself. And I guess I decided that we were going to propose it as chair. And we are going through the process now of getting public comment for it, refining it, and moving it forward. The basic idea of the program comment is to advance two policy statements that we adopted last year. First, a policy statement on housing and historic preservation. Second, a policy statement on climate change and historic preservation. Both, I think, interesting, new, maybe groundbreaking in different ways. They adopted as our formal policy as an agency that we would, among other things, modify the Section 106 process to ensure that we better responded to climate change and housing. So this program comment addresses housing. Housing. It addresses clean energy to some extent, really primarily building mounted solar.

[20:52] It addresses climate smart buildings, which are defined as buildings that are electrified, use renewable energy.

[21:03] Use energy efficiency techniques, and so on to, again, address issues related to climate change. And then what we've called in a policy statement, climate-friendly transportation, which includes those no or low emissions modes of transportation, not just walking, the lowest emission mode, but also biking, micromobility, public transit, and more. And basically what we say in the program comment is that all of these different things, the conversion of buildings to housing, the rehabilitation of existing housing for more modern purposes.

[21:40] The installation of clean energy, the energy efficiency components of buildings, upgrades to electric appliances.

[21:49] And transportation improvements, that these should be, in effect, fast-tracked through the Section 106 process using these clear rules across the board that apply to all federal agencies. So the program comment is different in that we've proposed it. It's different because of the subject matters that are covered.

[22:11] Multiple subject matters in one program comment. And it's also different because it clearly, I think maybe for the first time, tries to advance specific policy statements through modifications to the Section 106 process. And by the way, some of the provisions in the program comment have been adopted in state-specific agreements over the years or maybe public housing authority-specific agreements. So not all of it is new. What is new is that it would apply government-wide to any agency that's undertaking those activities. It's this kind of response that's imperative for us to address or to play our role as preservationists in addressing housing issues and climate issues. And so if it isn't obvious for folks, what I like this whole thing, if I'm understanding it, so like putting solar on a historic building, sometimes that can just get caught up in so many rules and so many delays. And so what you guys are trying to do is make that process easier. I think I have that right. And I think that's great because I've had that conversation on this podcast before is that so many historic buildings that you put a bubble around it and they're no longer making history and they're no longer useful. So am I getting that right? That's what you're trying to do here.

[23:23] Absolutely. We are trying to make it easier for really for Americans to get housing, to get clean energy buildings, to get better and faster delivery of climate friendly transportation investments. We've seen in the Biden administration unprecedented investments in all of these areas. And I'll just point out one of them, the Greenhouse Gas Reduction Fund.

[23:49] Tens of billions of dollars that are focused on upgrading existing buildings, on increasing energy efficiency and more. And we recognize as a federal agency, every dollar that's spent in the GGRF and all of the IRA and bipartisan infrastructure law funding.

[24:08] Every dollar of that, virtually every dollar is subject to Section 106 because these are federal agencies doing activities, building stuff that triggers Section 106. So we don't get ahead of all of that

activity as it comes down the pike. We're doing a pretty big disservice to the American people. So that's really the other aspect of this. Not only is it important just generally, we've got to make sure that preservationists play a strong role in responding to climate change. But during the Biden administration, we've seen huge investments. We need to get that out the door faster. People need access to the kinds of investments that we're making. And Section 106 can be a big part of that. And accelerating Section 106 reviews, where we know that we don't need that kind of detailed review that Section 106 sometimes requires and calls for and is very important. For the run-of-the-mill housing rehab, let's just get it done. We don't need that same kind of review if operators are working within the principles that we set out in the program comment. At least that's my opinion. And we're still waiting public comments to come in, and I'm sure it'll be amended. But the basic starting point for me is this is stuff that we've got to get done. So I'm curious, like I just said, I generally support this, I think. Do you have a historic neighborhood and those kind of things that they want to start thinking about solar panels across the board? Has there been any pushback? And I know you're getting comments now, but there's obviously more, the bigger voices that'll weigh in earlier.

[25:36] And I'm also very sensitive to like, maybe a different administration will use new rules like this to do things that we don't want to happen. And they're just justifying kind of steamrolling things. How do you guys factor that into? The way that the ACHP works is it is a full council with a lot of different views represented. As I mentioned, 10 of the 24 members are federal agencies, 11 are presidential appointees, and then we have preservation organizations in the mix as well. So everybody has a different perspective. And what I've been trying to do in my role, and again, as the only full-time member of the council, is to really set the agenda, propose things that members can respond to rather than maybe sitting around having focus groups and meetings and trying to draft by committee, but really taking what members have said they supported and trying to distill it into some, in this case, a regulatory document that if adopted would change all of these reviews. across federal agencies and across the board. Of course, there will always be people with differences of opinions. As I mentioned, many of the things that are included in the program comment have been adopted by at least one document out there, maybe hundreds of documents in some cases that might be specific to specific projects or to specific states. For example, we see a lot of what we included on roadways and bike issues in various state agreements with state DOTs that are Section 106 related agreements that have been negotiated.

[27:06] And I think I take a lot of comfort in that. And what we're trying to do with the program common is take all those best practices and lift them up and spread them out, spread them across agencies. Because the way that these agreements have often operated in the past, as you might hear from the way I've been describing them, is they've been specific to a project or they've been specific to a geography. Instead of having a whole bunch of the same agreement across a lot of different jurisdictions, let's take the best parts of those agreements and put them into this much more powerful tool where everybody, no matter where they live, is getting access to the same benefits and is playing by the same rules. Has your agency, have you guys started thinking specifically about managed

retreat and how historic preservation fits into that? And obviously managed retreat is looking at big, large scale movement of people

Managed Retreat Challenges

[27:54] and communities and such. Have you guys put your heads around that?

[27:57] So this is a really interesting question. And I don't think that any federal agency has really been able to wrap their minds around what managed retreat looks like and what it means. Certainly, if there are federal dollars that are spent on helping a community manage their retreat, that triggers the Section 106 review process. I can't speak to the couple of times when that's happened on that federal investment has happened in the recent past, but communities in Alaska, maybe communities post-Superstorm Sandy, I think New Jersey have gone through that process. But I will say there's not a uniform approach that we've developed at the ACHP at the moment, in part because I think lots of people are still maybe scared to talk about managed retreat as federal policy. And so what we're doing is these sort of one-offs where, again, the Section 106 process is completed as required by whatever agency is administering the funding, but it's really not something that has seen any sort of wide-scale approach.

[29:07] And from a practical standpoint, until we have a little bit more data about how some of these programs work, we as the ACHP haven't really developed clear protocols for, we don't have a managed retreat program comment, for example. We just, you know, that's something I think that we're almost certainly going to have to grapple with in the future, because not every community will be savable in its current form. So on the one hand, we could talk about managed retreat as this sort of far off conceptual thing, but I think it's going to come in many communities sooner than we know it. That said, I will say that as chair, one of the things I did last year was start a discussion, a public discussion about these federal standards that are not administered by us, but they're administered by the Department of the Interior, they're called the Secretary of the Interior Standards for the Treatment of Historic Properties, so pretty straightforward name. But these standards have not been changed for maybe 30 years, and they don't really take into account, what they do is they set out the ways that agencies need to approach historic places when they do anything to the historic places.

[30:21] And right now, the standards don't really account for climate change in a way that I think is enough to really, I think, respond to the magnitude of the problem. So, for example, the standards say or have been interpreted to say you can't put solar panels on a roof where they're visible from the street on a historic building. And it's people. Solar panels are removable. As long as they don't damage historic fabric, let's get them going. Let's put them on every historic building that wants them.

[30:54] Similarly, with raising buildings, with moving buildings, relocation of buildings is often seen as a huge no, but relocation is going to be increasingly important. At the same time, we are going to have to acknowledge that some things will not last, maybe at all. So how do you develop a federal approach to respectful deconstruction? Another colleague of mine, Jenny Minner at Cornell, has also been at the

forefront of conversations about deconstruction and the importance of recycling those materials and how that works with how we think of historic preservation today. Again, these are conversations I think the federal government is starting to have, but may not. I don't know that they'll be resolved anytime in the near future. But it has been my goal at least to start identifying some of the issues. And so that the conversation about the standards resulted in a report that I issued in March of 2024 about really evaluating the standards and how they've been applied and interpreted. And while they're kept at the Department of the Interior, they're applied and interpreted by state historic preservation officers all around the country, by local historic commissions, of which there might be more than 3,000 all over the country. So they're hugely important, hugely consequential, and they come into play with almost every regulatory decision that relates to historic preservation across the country at all levels of government.

[32:16] I'm not sure if you're familiar, but every year Columbia hosts a managed retreat conference. And I encourage you, if you haven't already, just send a staffer to that because I think you don't hear much from the historic preservation kind of community at those conversations. It's very academic right now. They're getting ahead, but they're making us think about these things. And so I'd be curious, you have your advisory council and you guys see the same sea level rise models that we all do. Okay, here's three feet, here's five feet. These whole areas like South Florida is completely inundated. And if you overlay historic buildings on those sea level rise projections.

[32:49] What is it like your group of folks think about that? Because do you automatically just say we're throwing in the towel on these because these are legitimate sea level rise projections and it's just you can't move those things or you can't try to protect them. You guys must, you see those same projections that we do. So here's the thing, and I've tried to raise awareness of this issue in testimony toward at a congressional roundtable in conversations that I've had with environmentalists and others. We actually do not have an integrated map of historic places all over the country. Wow. So there is no such thing as overlaying sea level rise data on historic properties because we might have, okay, we have piecemeal state historic preservation office information about maybe stuff on the state register, stuff on the national register within the state. We have a database from the National Register, the keepers within the Department of Interior, with a map that they say is not really up to date. We have no information on an integrated basis for local governments and their local historic districts, which are often much more detailed, much more community oriented than, let's say, the National Register. So these are different listings of historic places that all have their they can be mapped because they are places, but we do not have an integrated map.

[34:18] I love your question. I think it's, yeah, in theory, we would see that tons of historic places are subject to, let's just say, sea level rise alone, not to mention wildfire risk and all these other things that climate researchers are mapping to great success nationally. But we don't have a way to document that from a preservation side. So I've asked Congress to pay attention to this, to help the ACHP be one of the coordinators of that kind of data to invest in a mapping system. I work as a professor on a different mapping project called the National Zoning Atlas, which is mapping every single zoning code

in the country or is aiming to. In fact, just today, the team posted North Slope Borough, Alaska, which is the northernmost county in the United States and has a size larger than 13 states.

[35:13] Talk about climate effects. Believe it or not, the whole county is zoned. Climate effects up in the Arctic Circle, up in the very northern reaches of the U.S., that's going to be a fascinating study. So we're getting it done in other areas on the local side. We're getting it done in other regulatory areas. We are super behind in preservation. So if anybody out there wants to join forces, whether through the ACHP or otherwise on this topic, I think it's pressing because you cannot protect anything when you don't know where it is. Climate equity, climate justice, environmental justice are just that people are trying to fuse those with climate adaptation. This is a good thing. Early on, adaptation is still a relatively new area. And you think of historic preservation sometimes are at odds with that. And so I know that's an important area for the council, but I'm going to give you, I did an episode with Lisa Craig, the historic preservation community is quite small and I've worked with her quite a bit and Dr. Marcy Rockman. And we had a conversation about preserving lighthouses and think of the expense that goes into these preserving these important historic sites when that money potentially could be used to help low income areas get out of flood zones and all that. It's that friction that's happening.

[36:21] People could make an argument. A lot of historic preservation could just be another form of maladaptation. And then you're probably familiar with that term maladaptation. So please, I'm all about cultural preservation, but those are things that are starting to pop up and we have to think about it. Yeah, any approach to historic preservation has to be equitable.

[36:38] And for me, my background is really focusing on equitable regulatory practices. I would say before this role, primarily in zoning, I served as a volunteer chair of the city of Hartford's Planning and Zoning Commission for seven years. We did create Connecticut River Overlay District. We did try to address sustainability issues in the context of a very poor city that's 85% Black and Latino because looking at zoning and looking at how bad zoning was 50 years ago, it sort of created as a totally rezoned, as a car-oriented city, and that was locked in place for 50 years. We rewrote the code and hopefully addressed some of those issues that will take some time. Over time, we'll hopefully manifest themselves in the city. But equitable laws, equitable policies, equitable approaches is really at the core of how I think about things. And believe it or not, I actually think that if we had the kind of maps, the kind of tools that I'm talking about, I think we would find that lots of historic neighborhoods actually are accessible, actually create affordable housing and generate affordable housing. We know from some studies that historic properties and historic districts are often more densely developed than non-historic districts, which tend to be more sprawl-like, more single-family, whereas historic neighborhoods are much more sort of housing diverse.

[38:04] And I know Lisa's work, and she's been working at Annapolis, by the way, and others. I know Lisa pretty well. And I really admire the approach that she's taking to thinking about all of these dimensions. But I do think without more data, it's really hard for us to craft the approaches in the preservation community that would really make a difference. But again, all that said, I do think that if we had better data, we could start to combat at this sometimes one-sided characterization of historic

districts and historic places as being just for the elite. I don't think that's true. I don't think that's true when you look across the country. It may be true in maybe Manhattan, but I don't think that's true across the country. In fact, historic districts are often designated to help spur on revitalization, rehabilitation, reinvestment, because those places may have gotten neglected over the years. I think there's a really complex story there. And I think we, as a professor, I think we need more data. I think we need to learn more and then we can better tailor our policies to match.

[39:09] Yeah. And I guess I worry too about, it seems like there's this sort of slow pace. People are getting comfortable doing adaptation plan. They're only discovering it now, but in the reality of climate change, it's that we could have more drastic changes in the system. And there's still this kind of attitude that we can take our time with a lot of these things. And that's, that's how I approached my podcast too. We're just starting to do these things, but yeah, my, it's just, I think that some of the federal agencies are just tiptoeing around it and And just, I think, big, tough decisions are coming. And like you said, you don't even necessarily have the tools and resources, but we need to get those because before you know it, all of a sudden, it's no longer a priority that we're going to preserve our cultural heritage because now we're just getting people out of the danger zone. You know what I mean? We could be forced to be putting these sort of really quicker decisions and things that we have the luxury of taking our time for right now. It's that every year that passes, that could change. Yeah, I guess I would say I'm one of those people that feels a sense of extreme urgency.

[40:06] Which is why you asked me before whether, for example, people have objected to our issuance of this program comment. And I would say not on the substance so much as on the speed.

Urgency in Historic Preservation

[40:19] So people have said to me, oh, you just push this out so quickly. Now, if I could have pushed it out in 24 hours of arriving on this job, I would have. It's taken a year and a half of me being in the job to have issued that program comment and to have gotten it together and gotten our policy ducks in a row and really looked at all that's been in place. I feel like all of this is incredibly urgent. I agree with you that one day we're going to look up and say, why didn't we do this 40 years ago? Why didn't we do this 10 years ago? And we're going to see the places that we care about lost, to me, needlessly lost, because we didn't put in place the sort of forward-looking policies and legal documents now that would allow us to plan for the future. So for me, this is highly urgent.

[41:06] One of the reasons why I've been working so quickly to try to move this stuff out the door is because I see...

[41:12] Hey, for me anyway, the Biden administration has been great on these issues. There's a lot of support within the administration. Let's take advantage of that. And let's try to get some, again, get preservationists part of that conversation and part of the solution. And I do think that's a critical part of my role. I think it's something I committed to do when I went through the Senate confirmation process. And it's something that I have to track record to, and the help both from staff and from a committee of

advisors that I've convened and our council members and the expertise that they bring, especially the longtime federal agency council members, to say, hey, what can we get done? And let's do it. Let's make some changes because I don't think we have any time to waste. And I don't even think we're doing as much as we could now. So I'm with you on that. And I hope to make a difference in whatever time I have left. So I want to end on a positive note. I really appreciate the work that you're doing there. And I do think there's an opportunity because people still don't quite get what

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[42:16] climate adaptation is. And I think maybe you have some thoughts. How could historic preservation inform the adaptation sector? And also, if you want to give advice to those planners and I have all these types of listeners, if they want to learn more, because I've done a few episodes, Keeping History Above Water. I'm not sure if you're familiar with that model. It's about climate change, but more sea level rise. But are there conferences?

[42:36] Are there ways for people plugging into historic preservation and climate change? This year, there have been and will continue to be a ton of conversations happening in the historic preservation community, whether a conference that's happening at Tulane University called Resilience and Revival.

[42:55] Whether History Above Water, which took place in Honolulu this year, and I'm not sure where it'll be next year, Whether it's academic conversations that are happening in historic preservation programs all over the country, these conversations are active, but they haven't really broken through to, I would say, the mainstream, either mainstream media or mainstream, really just even conversations within the adaptation community.

[43:22] Part of what I've been trying to do in my role is to use every opportunity that I've had to try to raise awareness of this intersection, because I do think that adaptation professionals have a lot to learn from historic preservation. And I think the core of it is that historic preservation is about people and their stories and adaptation, especially when you're talking about things like managed retreat, is going to require people.

[43:52] To be part of the conversation. This is not an abstract, oh, you take this house out, you move it here, you move this household here. They're not households, they're households, but they're individuals, they're people. And I think historic preservation and connections to place and those kinds of priorities that preservationists have really developed and honed in on over the years are exactly the kind of thing that adaptation professionals might be able to learn from, rely on, incorporate as they're thinking about these, maybe at least in theory, more technical decisions. This whole conversation is about making sure people understand what's happening in the world around them, helping them to buy into a shared solution, solutions that might be difficult, and ensuring that they continue to feel like they're part of their own story. And I do think that's what historic preservation is about and why it's a really important part of adaptation conversations. So I want to thank you for having me on this podcast

because it gives me the opportunity to chat with those adaptation professionals. And I should also say too, anybody out there can find me. I'm at chair at achp.gov. I'd love to keep the conversation going.

[45:09] Last question is if you could recommend one person to come on this podcast, who would it be? Erica Avrami, who is a newly appointed expert member of the Advisory Council on Historic Preservation. She is the James Marston Fitch professor at Columbia's Graduate School of Architecture, Planning, and Preservation. And I think her work, which focuses on the intersection of sustainability, equity, and historic preservation, would be an awesome thing for your listeners. Sarah, it's been a pleasure having you on. I love talking about historic preservation. I've covered it quite a few times and thank you for the work that you're doing. Thanks for having me.