



American Planning Association

Creating Great Communities for All

November 11, 2023

Mr. Reid Nelson
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Via email: housing@achp.gov

Dear Mr. Nelson:

On behalf of the American Planning Association (APA), I write to voice our support for the Advisory Council on Historic Preservation's (ACHP) housing and historic preservation policy statement. The lack of affordable, attainable, and available housing is a national crisis impacting communities of all sizes, and solving this crisis will require innovative policies such as these and collaboration among governments, nonprofit organizations, and the private sector. Given the federal government's leadership role in addressing housing and historic preservation, APA welcomes this policy as a critical step in the effort necessary to increase the supply of affordable housing in a way that incorporates appropriate stewardship of the nation's historic fabric.

Since about 40 percent of America's buildings are at least 50 years old, we agree that the housing shortage is not a problem America can build its way out of solely through new construction. Preservation and rehabilitation can and must be part of the affordable housing solution. These approaches often provide faster and less expensive options for boosting local housing supply. Preserving existing affordable housing in older neighborhoods and creating new units through the adaptive reuse of vacant and underused spaces is vital in addressing the affordable housing crisis while meeting community revitalization and sustainability goals.

APA supports the development of historic tax incentives and easier ways to pair those incentives with housing tax incentives, especially the Low-Income Housing Tax Credit and those that assist lower- and middle-income owners of historic homes. APA also supports adaptation and modernization to meet health, safety, housing production, and community revitalization needs while maintaining historic preservation principles. As such, APA supports the ACHP's encouragement to all participants in the Section 106 review of housing projects to approach the review flexibly and with an eye to the needs and goals of the broader community.

APA looks forward to collaborating with you on how to support and encourage needed flexibility that can address both housing and historic preservation needs. Issues such as definition and application of

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standards for setting, application of building codes for updates, capacity building for local staff to avoid overly narrow interpretation of standards, and greater use of alternatives need to be addressed to help localities balance needs and find acceptable solutions. APA will be embarking on a comprehensive update to our policy on historic preservation and plan to integrate new approaches from our zoning reform initiatives to identify ways to help planners tackle these challenges.

APA is eager to work collaboratively with you and to share information on a research agenda of the costs, benefits, incentives, and disincentives associated with rehabilitating historic buildings for housing. Because APA believes that planning led-zoning reform that is tailored to each community's unique circumstances can increase housing choice, lower housing costs, bolster local economies, address inequities in our communities, and connect people to opportunity, APA is also committed to exploring the development of recommended best practice zoning and code suggestions to assist local governments and planners to incorporate preservation and adaptive reuse of historic buildings as part of the solution.

In our collective efforts to address our national housing crisis, it is imperative that we consider all ways to encourage the production of housing and that we do so in a way that strategically considers design quality and historic preservation as solutions, not impediments. We appreciate your leadership in developing this policy statement to provide expert advice to a wide range of stakeholders on historic preservation's role in alleviating the housing crisis. It is just the type of innovative policy that is sorely needed.

Sincerely,

A handwritten signature in blue ink that reads 'Angela D. Brooks'.

Angela Brooks, FAICP

President

American Planning Association
