

# NOVOGRADAC Journal of Tax Credits...

Insights On Affordable Housing, Community Development, Historic Preservation, Renewable Energy and Opportunity Zones November 2021 • Volume XII • Issue XI **Published by Novogradac** 

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HISTORIC TAX CREDIT TOOL BOX \$\&

# Historic Buildings in the Face of Climate Change and Natural Disasters



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In late August, Hurricane Ida made its way from the Gulf of Mexico northeast into the New England states. Along the way, the storm wreaked havoc on towns and cities, flooding rivers and creeks and forming tornadoes that not only damaged the built environment, but resulted in the loss of numerous lives in Louisiana, Mississippi, Alabama, Virginia, Maryland, Pennsylvania, New Jersey, New York and Connecticut.

The effects of Hurricane Ida are still felt months later. Damage caused by the flooding, heavy wind and rain, and tornadoes remains visible. In Pennsylvania, for example, various examples of larger cities and smaller towns effected by Hurricane Ida illustrate the historic development patterns of building along waterways. In the small Pennsylvania town of Collegeville, approximately 30 miles west of Philadelphia, the Perkiomen Bridge Hotel—a former tavern that was originally constructed in 1706 along the primary route that connected Philadelphia with Reading—was

significantly damaged in flooding from Hurricane Ida. Similarly, in Center City Philadelphia, a series of mid-20<sup>th</sup> century residential high-rise buildings along the Schuylkill River were flooded in the storm and required the evacuation of thousands of residents.

Climate change is impacting historic buildings dating from the 18<sup>th</sup> century to the mid-20<sup>th</sup> century in cities, towns and suburbs across the country.

# The HTC Incentive and Climate Change

Traditionally, threats to historic buildings were primarily tied to redevelopment efforts or policydriven changes, such as urban renewal. The historic

Image: Courtesy of Heritage Consulting Group

The Perkiomen Bridge Hotel, shown here following the damages of Hurricane Ida, has maintained its location in Collegeville, Pennsylvania, along the Perkiomen Creek for more than 300 years.

preservation field, using the historic tax credit (HTC) incentive among others, galvanized against such development trends in the mid-20<sup>th</sup> century. As the preservation field has progressed in the 21<sup>st</sup> century, developers, preservation consultants and the National Park Service (NPS) have turned their attention to combating the effects of climate change in rehabilitation projects.

The NPS's Technical Preservation Services (TPS) has a dual purpose. They administer the HTC program, reviewing projects to ensure that rehabilitation projects meet the Secretary of the Interior's Standards for Rehabilitation. TPS is also responsible for maintaining the Secretary's Standards and providing general guidance about the interpretation of the Standards and technical preservation-related guidance. For many years, TPS staff has worked on the development of guidance around the topic of climate change with an emphasis on flooding and sealevel rise.

The urgent need for such guidance became known in the wake of Hurricane Katrina's devastation. Before that point, guidance on protecting historic buildings against natural disasters focused primarily on postdisaster repairs and cleanup. Katrina served as the impetus for the creation of NPS guidance on the subject matter.

Following Katrina, the HTC program at both the federal and state level played a critical role in inspiring reinvestment into communities such as New Orleans. On the federal side, the HTC increased from 20% to 26% in the Gulf Opportunity (GO) Zone. Concurrently, various states in the GO Zone saw an increase in rehabilitation projects. Additionally, some states, such as Mississippi, enacted state HTC programs.

Later high-profile storms had a similar impact, with Congress temporarily increasing the value of the federal HTC in 10 Midwestern states following devastating floods in 2008 as well as in Texas and Louisiana as a result of Hurricane Ike that same year.

# **Beyond Hurricanes, Tropical Storms**

The impacts from natural disasters and climate change on historic buildings, however, extends beyond hurricanes and tropical storms. The NPS published an "Impacts Table" in 2016 that identifies various climate-change-related risks and notes a range of potential impacts and effects that might be observed for different types of cultural resources. Climate change is not isolated to specific regions, such as coastal areas. Flooding, for example, occurs all over. As a result, the NPS receives applications from all parts of the country for HTC projects that require alterations or renovations stemming from natural disasters.

In addition to flooding, the following concerns are identified by the NPS as serious potential threats to historic buildings, and many are illustrated within HTC projects, although building owners may not associate some of these factors with climate change: western wildfires; wind-load requirements for windows and structural components that need to be anchored together; changes to the freeze-thaw cycle; tornadoes; general temperature increases, which is resulting in increased impact from insects such as termites and other wood-boring beetles.

For HTC projects that require alterations to accommodate potential climate change-related impacts, the NPS does not have a one-size-fits-all review process. TPS staff has noted that in its review, the NPS will evaluate each proposal as it relates to the specific building and site. For a project in a flood zone, for example, it is impossible to say that elevating the building or raising the interior floor level will always be the best solution. The proper mitigation depends on the architecture itself, the topography of the site and various other factors. The NPS will generally base decisions on the significance and integrity of the property, with a preference for retaining and repairing the most important character-defining features and spaces of the building. The facts and circumstances of each project are assessed in determining appropriate solutions.

# **Unique Solutions**

In many instances, unique solutions are required to accommodate the needs of a building while maintaining its significant features. TPS staff have indicated a willingness to be open to trying and testing new solutions. In southeastern Texas, for example, two ongoing HTC projects are tackling potential flood problems head-on. One project features an NPS-approved flood wall, while the second was approved to raise the first-floor level at the interior above the flood zone. In Maryland, an HTC project was approved with aquarium glass in the lower sash of a double-hung window to provide the necessary dry floodproofing resilience. At the same time, projects in locations that are frequently hit by hurricanes, such as Florida, Louisiana, Mississippi and South Carolina often require window replacement to accommodate increased wind loads.

As climate change impacts occur with greater frequency, HTC projects are beginning to account for the potential impacts flooding, altered freezethaw cycles and heavy wind loads, among many other concerns, may have on historic buildings. TPS recently authored NPS guidance, Guidelines on Flood Adaptation for Rehabilitating Historic Buildings, which highlights the agency's understanding that in order for historic buildings to survive, climate change must be taken into account. As additional issues resulting from climate change are incorporated into HTC projects, additional guidance will be issued to inform the specific needs of individual buildings. Regardless of the concern, the NPS, developers, and historic preservation consultants will continue to seek unique solutions to preserve the country's historic resources, while planning for potential challenges with climate change and natural disasters. \$

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ISSN 2152-646X

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