



**National Trust for  
Historic Preservation**  
*Save the past. Enrich the future.*

February 2, 2024

Heather Clark, Director of Building Emissions  
White House Office of Domestic Climate Policy  
The White House  
1600 Pennsylvania Ave NW  
Washington, DC 20500

**RE: National Definition for a Zero Emissions Building**

Dear Ms. Clark:

Thank you for the opportunity to share our views on Part 1 of the National Definition for a Zero Emissions Building, released for public comment on January 9, 2024. In addition to this letter, we have provided specific comments regarding this definition through the Department of Energy Request for Information online form.

The National Trust for Historic Preservation (“National Trust”) is the nation’s leading nonprofit historic preservation organization. Working closely with state and local partners across the country we seek to preserve historic places and tell the full American story through advocacy, education, stewardship, and investment. Our Main Street America (“Main Street”) subsidiary strengthens communities through preservation-based economic development in approximately 2,000 older and historic downtowns and neighborhood commercial districts across the country. Our National Trust Community Investment Corporation (“NTCIC”) subsidiary is among the most active tax credit syndicators in the U.S., supporting historic rehabilitation, community revitalization, and renewable energy initiatives through federal and state tax credit financing.

The Department of Energy’s draft definition of a zero emissions building provides a clear and measurable path to eliminate carbon emissions from building operations. As stewards, investors, and advocates for historic sites and structures, we recognize that all buildings, including historic structures, can and must meet the definition of a zero emissions building: highly energy efficient; free of on-site emissions from energy use; powered solely by clean energy. Achieving these outcomes will require significant time and resources, especially in historically disadvantaged communities. Federal investments – through grants, loans, tax incentives, partnerships, and technical assistance – are critical to achieve the goals articulated in this definition.

Successful implementation of this definition will also require clear and consistent measurement and reporting standards across federal agencies and programs. We anticipate that there will be a need to develop strategies that address unique conditions in older and historic buildings, including long vacant structures that could be repurposed and retrofitted, but do not have recent performance data. In addition, it may be necessary to provide reasonable flexibility in the application and interpretation of Secretary of Interior’s Standard

**Carol Quillen** | PRESIDENT & CEO

600 14th Street NW Suite 500 Washington, DC 20005  
E [cquillen@savingplaces.org](mailto:cquillen@savingplaces.org) P 202.588.6105 [SavingPlaces.org](https://www.SavingPlaces.org)

for Historic Properties to access current federal tax incentives, along with other future incentives, which can help accelerate the retrofitting of historic properties to achieve zero emissions performance. We would welcome the opportunity to consult with the White House Office of Domestic Climate Policy and federal agencies as implementation criteria are developed.

The National Trust and our partners in the preservation community have long promoted building conservation and reuse as a key strategy to help reduce energy use and carbon emissions. Avoiding embodied carbon emissions by reusing rather than replacing older buildings provides immediate climate benefits. We are therefore keenly interested in participating in the development of the forthcoming definition of “zero embodied carbon emissions” for buildings. As operating emissions ramp down in coming years, actions to reduce embodied carbon emissions through all means, including building reuse, will become increasingly important.

Thank you for considering our views on Part 1 of the definition of a zero emissions building. It is an important step toward the goal of removing carbon emissions from the whole life cycle of buildings. We look forward to integrating this definition into our work to create decarbonization pathways for our nation’s older and historic buildings to ensure that these important structures continue to serve as models of sustainable stewardship.

Sincerely,



Carol Quillen, President and CEO  
National Trust for Historic Preservation



Erin Barnes, President and CEO  
Main Street America



Suzanne Brown, Interim President and CEO  
National Trust Community Investment Corporation