14 March 2016

The Honorable Kevin Brady  
301 Cannon Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Sander M. Levin  
1236 Longworth House Office Building  
United States House of Representatives  
Washington, DC 20515

Re: Federal Historic Preservation Tax Incentive Program

Dear Chairman Brady and Ranking Member Levin:

The Society of Architectural Historians (SAH) strongly supports the preservation of the Historic Rehabilitation Tax Credit, and encourages any efforts to retain this important program. The program provides essential incentives for the preservation and adaptive reuse of our nation’s historic buildings, which in turn protects the vitality of our communities, neighborhoods, and cities. On behalf of preservationists, property owners, and municipal governments across America, we find the proposal to repeal this essential credit deeply disappointing.

The Historic Rehabilitation Tax Credit has been a beacon for neighborhood preservation within the tax code for over 30 years, and has become the most significant federal investment in preservation across our nation. Since its inception this credit has leveraged approximately $109 billion in private investment, resulting in the creation of more than 2.4 million jobs. In these economically challenging times, we believe that this program is not only good public policy, but it is a proven job creator and engine of economic expansion, something which benefits all Americans.

We note that the program actually more than pays for itself. Since 1981 the Internal Revenue Service has issued $21 billion in historic tax credits. Over $26 billion in direct federal tax revenue has been generated in the process. Even the Tax Reform Act of 1986 declined to repeal or modify the credit, following a House Ways and Means Committee determination that revocation of the credit would leave property owners and developers with no incentive to rehabilitate our urban areas, leading to further urban deterioration. Then, as now, the Historic Rehabilitation Tax Credit is largely responsible for the health, vitality, and diversity of our communities. The rehabilitation projects that it supports also serve to protect the types of buildings and neighborhoods that attract tourism, commerce, film, and other secondary activities. Revenue resulting from these activities stays within the community, to be used for the enhancement of the built environment and the benefit of all who live there.

SAH is the principal scholarly organization for architectural historians in North America. It does not regularly become involved in preservation issues, and speaks only to issues of national and international importance. We strongly believe that a successful reform of our nation’s tax code must retain the Historic Tax Credit. We respectfully request that as this tax proposal is developed in committee, you and your committee identify ways to improve rather than eliminate this much needed program. The SAH expresses its strong support for the retention of the Historic Rehabilitation Tax Credit, and believes it to be an important tool in returning historic American buildings to productive use.

Sincerely,

Bryan Clark Green, Ph.D., LEED AP BD+C  
Chair, Heritage Conservation Committee  
Society of Architectural Historians

Cc  
Dr. Kenneth Breisch, Ms. Pauline Saliga, Ms. Deborah Slaton, Mr. David Fixler, and Dr. Jeffrey Cody, Society of Architectural Historians, Heritage Conservation Committee members