



The President
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

RE: AIA Response to the Trump Administration's Proposed Rule to Roll Back Environmental Impact Reviews by Federal Agencies

March 9, 2020

The American Institute of Architects

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Washington, DC 20006

(800) 242 3837

www.aia.org

Dear Mr. President,

The American Institute of Architects (AIA) is committed to protecting the health, safety, and welfare of the public. Since 1857, this concern is central to all that we, as architects, do.

The AIA and our more than 95,000 members work to advance our nation's quality of life through design. On January 1st, the White House announced the Administration's intent to narrow the range of projects that require environmental reviews and to revoke the federal agency mandate to consider "cumulative" consequences of new infrastructure. This is troubling given that the facts are clear: Americans, and the world at large, need to do more – not less – to protect our environment and all its inhabitants.

The AIA writes to raise our strong opposition to your Administration's proposed reversal of mandatory environmental review for domestic infrastructure projects. Weakening one of the nation's most important environmental laws, the National Environmental Policy Act, will reverse important gains on environmental protections and increase the likelihood that future projects will damage the environment.

In a January 2019 report, the U.S. Department of Defense (DoD) called the effects of climate change a national security issue with potential impacts to the Department's missions. Additionally, the Fourth National Climate Assessment released by your Administration highlighted the long-term economic costs and environmental consequences climate change poses to the United States.

Ignoring the global call for climate action will only serve to weaken the long-term health of our infrastructure and the communities that use it. Without providing an environmental review for future infrastructure projects, emerging construction will add to the problem of climate change by neglecting the need for environmentally conscious design parameters.

Simultaneously, federal, state and local municipalities that manage public infrastructure assets will not be prepared to withstand the projected effects of climate change in the years to come, which would result in wasted resources, and worse, potentially endanger the health, safety and welfare of the public.

Federal agencies must utilize key modeling tools that already exist that can make environmental reviews more effective, seamless, and timely. By leveraging tools available, architects analyze life-cycle environmental assessments of new buildings on a 50-year basis; they forecast

environmental impacts to the buildings while assessing a building's impact on the environment at large. Doing so provides a clear prognosis to designers and clients that factor into the building design.

As architects, we value infrastructure investment to build things that last. Indeed, buildings are just as vital to our communities as roads, bridges and mass transit systems – and architects design with that responsibility in mind. We oppose this move to ignore the climate realities that our infrastructure will be expected to weather in the years ahead.

Thank you for your careful review of AIA's concerns. Again, the AIA strongly opposes any efforts to withdraw from existing regulations that would weaken the National Environmental Protection Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Ivy". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert Ivy, FAIA
EVP/Chief Executive Officer