

To: Executive Committee, American Climate Corps Initiative
From: Erin Barnes, President and CEO, Main Street America
Date: January 30, 2024
Re: Listening Session Feedback on American Climate Corps Initiative

On behalf of Main Street America, we thank you for the opportunity to comment on the Biden Administration's American Climate Corps Initiative (ACC). Main Street America (MSA) leads a collaborative movement with partners and grassroots leaders that advances shared prosperity, creates resilient economies, and improves quality of life through place-based economic development in downtowns and neighborhood commercial districts across the country. Our network of commercial district redevelopment entities includes 46 Coordinating Programs at the state, county, or metro city level, with 1,287 neighborhood and downtown affiliates committed to a place-based economic development methodology.

Central to our mission is helping communities take advantage of resources and opportunities that will help them better withstand crises and shocks that lay ahead, such as climate change and its impacts. As the ACC Executive Committee launches the program, we strongly urge training ACC participants to support adaptive reuse and retrofits of existing buildings on commercial corridors and to act as recovery coordinators.

Adaptive Reuse of Buildings Reduces Carbon Emissions and Requires Well-Trained Professionals

MSA strongly encourages the Executive Committee to offer training for ACC participants to promote adaptive reuse of underutilized existing buildings in both rural and urban areas, including the repurposing of older and historic buildings. Adaptive reuse can offer a pathway for communities across the country to conserve cultural and historic assets while also addressing environmental concerns and strengthening community resilience.

The ACC is charged with training professionals to advance climate resilience and clean energy. Adaptive reuse of buildings meets the challenge of the current time as thousands of buildings and parcels sit vacant and underutilized and the climate crisis worsens. While data quality is poor, some estimate that as many as 19 million buildings are abandoned in the United States.¹ It is also estimated that more than 1 billion square feet of built space is demolished annually. Yet our appetite for new space is unrelenting: each year, we typically build between 4 to 6 billion square feet of new space.²

Enormous carbon savings can be realized in the reuse of buildings, as rehabilitating existing buildings typically produces 50 to 75 percent fewer carbon emissions than new construction.³ Building rehabilitation offers these substantial savings because globally, approximately 13 percent of all greenhouse gas (GHG) emissions come from the construction sector.⁴ Since reusing and retrofitting existing buildings uses far fewer new materials than new construction, the embodied carbon of these projects is substantially reduced. This is particularly true when the carbon-intensive parts of the buildings are saved - the foundation structure, and envelope. Retrofitting these existing buildings achieves carbon reductions compared to new construction and offers a pathway for older buildings to

¹ <https://usafacts.org/articles/how-many-vacant-homes-are-there-in-the-us/>

² https://living-future.org/wp-content/uploads/2022/05/The_Greenest_Building.pdf

³ <https://www.whitehouse.gov/cea/written-materials/2023/10/27/commercial-to-residential-conversion-addressing-office-vacancies/#:~:text=Conversions%20also%20present%20an%20opportunity.carbon%20emissions%20than%20new%20construction.>

⁴ <https://www.rff.org/publications/explainers/federal-climate-policy-106-the-buildings-sector/>

achieve energy savings. This strategy strengthens the resilience of communities in urban and rural areas and minimizes their carbon footprint as compared with new construction.

Within the MSA network, 93 percent of communities report vacant upper floors, 47 percent report six or more completely vacant buildings, and 25 percent have vacant lots in their downtowns and neighborhood commercial districts. Equipping these communities with ACC professionals would facilitate more adaptive reuse projects and allow communities to reduce GHG emissions and grow stronger local economies. But, broadly, the construction industry is facing a significant shortage of skilled employees to complete projects. According to the Association of General Contractors 2023 Workforce Survey, 68 percent of construction firms agreed that candidates available for construction jobs are not qualified to work in the industry.⁵ Especially in rural and underserved areas, skilled labor for adaptive reuse is difficult to find.

Additionally, training ACC participants to support adaptive reuse and retrofitting of buildings meets one of the ACC's principles: Serving all of America's Communities. The ACC explicitly states it will prioritize locally identified projects and projects that help meet the Biden-Harris Administration's Justice40 goal of ensuring that 40 percent of the overall benefits of Federal investments in addressing climate change flow to disadvantaged communities that are marginalized, underserved, overburdened by pollution, and experiencing disproportionate impacts of climate change.⁶ Commercial corridors tend to be older, denser areas, and Main Street America's existing network is primarily in rural and historically underserved areas that have faced the burdens of climate changes. About 68 percent of Main Street districts overlap with areas identified as disadvantaged by the Climate and Economic Justice Screening Tool (CEJST).

Main Streets are also well positioned to promote community resilience, and ACC participants trained in adaptive reuse will equip Main Streets with vital personnel to improve connectivity and community resilience. Main Streets are made up of districts situated in the central business core of communities and are often close to government services and other providers that offer key services. Supporting adaptive reuse of these spaces breathes new life into Main Street districts and increases the social connectivity of communities, thereby strengthening communities' ability to face climate crises, recover, and build stronger communities. For this reason, combined with the carbon savings that can be realized through adaptive reuse of buildings, MSA strongly encourages the Executive Committee to ensure ACC participants can support adaptive reuse and green retrofits of the existing building stock.

Recovery Coordinators Are Vital in Strengthening Community Resilience

MSA urges the Executive Committee to train ACC participants as recovery coordinators to help safeguard communities from environmental and public health threats. Recovery coordinators serve as a focal point for incorporating recovery and mitigation considerations into the early decision-making processes when communities face threats and disasters. They not only monitor disaster response, but they can also assess the need for additional assistance and adjustments throughout the recovery.

Working collaboratively with Federal Disaster Recovery Coordinator, Federal Coordinating Officers, Local Disaster Recovery Managers, and State and/or Tribal Disaster Recovery Coordinators, these trained professionals are fundamental in bolstering community resilience. They also serve increasingly important roles as communities face more frequent and severe climate-related disasters.

⁵ https://www.agc.org/sites/default/files/Files/Communications/2023_Workforce_Survey_National_Final.pdf

⁶ <https://www.whitehouse.gov/environmentaljustice/justice40/>

MSA is encouraged by the Biden Administration's efforts to produce and disseminate preparedness indexes as well as resources and guides to assist in disaster recovery. Indexes like the Centers for Disease Control and Prevention's (CDC) Social Vulnerability Index and the Federal Emergency Management Agency's (FEMA) National Risk Index for Natural Hazards as well as its National Preparedness Report offer communities the resources needed to prepare for disaster ahead of threats. That said, trained professionals are necessary in communities to ensure that resources are being used appropriately and local responses to disasters are coordinated and effective in mitigating disaster impacts and recovering promptly and efficiently.

MSA is doing its own part to ensure communities are equipped with resources to prepare for and respond to crises, such as a forthcoming disaster preparedness toolkit for Main Street districts funded through the National Park Service. Beyond guidance, communities need dedicated capacity through professionals trained as recovery coordinators to manage a community's response to disaster and ensure that public and private entities are coordinating to safeguard the health, well-being, and safety of community members. These professionals act as a community-based focal point to establish recovery measures, promote inclusive recovery, facilitate a unified communications strategy, coordinate federal, state, and local assistance, and support community recovery planning and resilience building.

Additionally, incorporating recovery coordinators in ACC training aligns with goals that the program has set. Recovery coordinators are key jobs which offer individuals high-quality employment. The COVID-19 pandemic clearly demonstrated the need for strong preparedness measures in communities across the nation before disaster strikes. It underscored the disparate impacts of disaster on people of color and communities that face systemic inequities and structural barriers, like poor access to health care and social services and unequal access to economic opportunities.⁷ Recovery coordinators are a necessary component to any community in responding to disaster but are especially important for communities that face systemic inequities and structural barriers.

Communities need recovery coordinators so they can rapidly and efficiently respond to emerging environmental and public health threats. As we experience more frequent and severe climate-based disasters, these jobs will only become more important in the future. We urge the Executive Committee to ensure that the ACC program trains and prepared participants to serve as recovery coordinators.

Thank you for the opportunity to comment on this important initiative. Please direct any questions regarding this submission to Kelly Humrichouser at khumrichouser@mainstreet.org.

⁷<https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2789619#:~:text=Evidence%20shows%20that%20social%20determinants,19%20infection%20and%20mortality%20rates>