

To: Sara Bronin, Chair, Advisory Council on Historic Preservation

From: Erin Barnes, President and CEO, Main Street America

Date: October 9, 2024

Re: Proposed Program Comment on Accessible, Climate-Resilient, and Connected Communities

Main Street America (MSA) appreciates the opportunity to respond to the Advisory Council on Historic Preservation's (ACHP) Program Comment on Accessible, Climate-Resilient, and Connected Communities (the Program Comment). Since MSA's founding, historic preservation has been an important tenant underlying our approach, and we recognize the concerns on the Program Comment expressed by our parent organization, the National Trust for Historic Preservation, and other preservation partners. MSA believes that climate-friendly interventions like those described in the Program Comment have a symbiotic relationship with community preservation, facilitating the long-term health of Main Street communities, and we believe implementation of the Program Comment would make it more efficient and straightforward to undertake certain projects on Main Streets.

Main Street America Background and Climate-Friendly Projects

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 and community preservation in downtowns and neighborhood commercial districts across the country. As a subsidiary of the National Trust for Historic Preservation, a core element of this work is redeveloping existing buildings to bring active use back to disinvested downtowns and neighborhoods, with over 325,000 buildings rehabilitated since 1980. We do this through a network of 46 Coordinating Programs at the state, county, or metro city level, with over 1,200 neighborhood and downtown affiliates committed to a preservation-based economic development methodology.

ACHP notes that the Program Comment aims to "help satisfy the nation's pressing needs to expand access to housing, facilitate climate-resilient and zero emissions buildings, and promote climate-friendly transportation." MSA agrees that these are critical objectives, and our research on Main Street communities aligns with the rationale that ACHP lays forth in the Program Comment:

- As of 2020, half of the 900,000 housing units in or near Main Street districts were more than 50 years old.
- 68% of Main Street districts are in disadvantaged areas that face environmental, health, and economic challenges, as measured by the Climate and Economic Justice Screening Tool (CJEST), developed by the U.S. Council on Environmental Quality.
- Over the past five years, 218 pedestrians walking in Main Street districts have been struck by vehicles and killed.

Creating thriving Main Street districts requires a multifaceted response that combines preservation, multimodal transportation, economic development, and sustainability. These concerns were considered as part of our comments previously submitted on the ACHP Housing and Historic Preservation Policy Statement and in response to a call for comments on the Application of the Secretary of the Interior's

Standards for Historic Preservation. Those comments specifically uplifted the need to create more housing in Main Street districts through limiting Section 106 review on interior modifications.

To resolve challenges, Main Street communities seek support from numerous federal programs, from discretionary grants through the Historic Preservation Fund to a broad variety of programs of the Department of Housing and Urban Development (HUD), the Department of Transportation (DOT), and the Environmental Protection Agency (EPA). As a general observation in the Program Comment, we encourage ACHP to use established definitions for activities (from agencies such as HUD, DOT, and EDA) to further strengthen and streamline suggestions and avoid conflicts of terms. Because Main Street communities benefit from a broad spectrum of federal programs, Section 106 review may occur in a variety of different projects, with different project goals.

Main Street America is also a lead capacity builder on the DOT Thriving Communities Program, a grant program that aids local communities in securing federal dollars for infrastructure projects, including transportation, housing, and climate resilience goals. Our experience supporting a cohort of 20 rural and tribal communities indicates that the primary needs of these communities is capturing resources and building technical skills and capacity to redevelop buildings and strengthen infrastructure. Yet, many communities interested in federal funding fall through the cracks due to the immense burden of deploying federal funding, from application to compliance with federal regulations. Delays in project deployment for any reason increase costs and result in stalled or abandoned plans.

There remains a delicate balance between the urgent issues of climate change and the housing crisis and retaining physical assets in our communities that carry our stories and values. The Main Street network is diverse in its priorities, governance structures, and opinions on how to best strike this balance. Our comments below align to sections outlined starting in Appendix 1-A on specific actions covered by the Program Comment.

Housing-Related Activities Not Requiring Further Review

MSA appreciates the ACHP's efforts to help accelerate the review of federal agency actions to rehabilitate existing housing or create new housing in existing buildings, and to maintain and update buildings and their immediate environs, including essential civic infrastructure, in response to climate concerns. MSA collects primary data on the condition of Main Street buildings from our network of over 1,200 programs across the country through the Building Opportunities on Main Street (BOOMS) tracker. Based on our early analysis, we estimate around 200,000 upper-story housing units, which currently sit vacant or underutilized, could be created in these Main Street districts. We support ACHP's proposal to waive Section 106 review for maintenance, repair, rehabilitation, replacement and installation of certain interior elements of buildings. By waiving Section 106 review, small-scale developers on Main Streets will have an easier time navigating the challenging process of renovating historic buildings and facilitating the adaptive reuse of upper-story space into housing units.

Work on the Building Exterior

MSA supports preserving the historic integrity of buildings, especially primary facades. We support ACHP's proposal to exempt certain activities from Section 106, but we strongly encourage ACHP to consider how it could deploy the Program Comment to ensure that any replacement windows and doors meet energy-efficiency standards. While this change can facilitate the quicker development of upper floor

housing in Main Streets, we encourage balance with sustainability goals, such as requiring that replacement windows be double-hung, energy efficient windows, rather than replacement vinyl.

Additionally, we support the addition of solar energy systems and clean energy technologies on buildings in Main Street communities. We urge ACHP to emphasize that all clean energy technologies exempted from Section 106 review be reversible, which has long been the standard for historic preservation and is achievable with most energy efficiency upgrades. We believe that these changes will allow small-scale developers on Main Streets to convert upper-story units to housing, as well as renovate and breathe new life into businesses and homes alike on Main Streets – creating a built environment that is climate-friendly and more resilient.

Climate-Friendly Transportation-Related Activities Not Requiring Further Review

We are pleased to see that ACHP is working to facilitate more streamlined processes to improve or create new climate-friendly transportation infrastructure. Working collaboratively with local, state and federal departments of transportation, Main Street communities, from rural towns of less than 5,000 to large metropolitan areas, have played an active role in promoting and building climate-friendly infrastructure, like bicycle infrastructure and road diets. With the backing of decades of evidence, Main Street America believes that transportation infrastructure that centers people creates safer, more climate-friendly communities, while also boosting economic growth for businesses on or near corridors that implement these strategies. We support ACHP's proposals to usher in a more streamlined process for communities to implement these strategies, showing that preservation can play a supportive role in climate- and business-friendly interventions. When transit infrastructure promotes walkability and safety in a Main Street district, more buildings are put into active economic use, thereby facilitating their preservation.

We also acknowledge that our understanding of the multiple levels of existing program comments with state departments of transportation is limited; other entities involved in these processes have noted that the transportation concerns addressed by the Program Comment may already be covered under existing program comments. To the extent that this is true, we encourage the program comment to not be redundant to existing program comments executed by SHPOs and State DOTs.

Main Street America believes that interventions to create access to housing, facilitate climate-resilient and zero emissions buildings, and promote climate-friendly transportation are desperately needed in communities, and clear design guidance about what is and is not allowable will facilitate smoother adoption of these interventions. Finally, we have heard from the network of preservationists that the program comment could have negative impacts on undisturbed ground. We defer to tribal and other historic preservation experts on those issues. This is not a primary activity of ours.

Thank you for the opportunity to offer these comments. We appreciate any questions or further information required to support our comments and look forward to future collaboration with ACHP and other public-serving institutions to support this work.

Best,

Erin Barnes, President and CEO, Main Street America