



NATIONAL COALITION *for* **HOMELESS VETERANS**

Regulations Division Office of General Counsel Department of Housing and Urban Development 451 7th Street SW, Room 10276 Washington, DC 20410-0500

Re: Comments to the White House Council on Eliminating Regulatory Barriers to Affordable Housing Request for Information Docket No. FR-6187-N-02

Dear Secretary Carson,

Identifying the specific barriers to affordable housing development state by state and community by community requires an in-depth understanding of each individual community's wants and needs. We are collectively trying to solve the affordable housing crisis; however, it is important to also remember within this general challenge, there are subpopulations more deeply affected by the short supply of affordable housing than others. While creating affordable housing in general is important, it is also important to actively target and plan for what subpopulations this housing serves.

In recent years increased attention has been paid to the disproportionate burden housing costs can have on very vulnerable populations, like the elderly, veterans, and individuals who are mentally and or physically disabled. The National Coalition for Homeless Veterans believes affordable housing development is essential to ending veteran homelessness. Several communities have made public commitments to ending chronic and veteran homelessness; while efforts that transition individuals out of homelessness are important, it is also crucial to support affordable housing efforts by highlighting communities that have sought to address this issue head on.

This comment aims to

1. pinpoint some examples of policy interventions, solutions or strategies state and local level decision makers have curated to ease affordable housing development.
2. suggest actions or initiatives HUD can take to help reduce the barriers, by building cohesiveness amongst various states and regions scrambling to meet affordable housing demands
3. highlight how ending veteran homelessness can become a reality through increased affordable housing funding, production and delivery.

The following are possible solutions that have been tried in communities which can alleviate the burden of creating affordable housing for veterans exiting homelessness.

State level administration more directly controls the obstacles local municipalities must overcome to create affordable housing. Navigating funding shortages remains one of the biggest barriers. While there are federal funds that have been creating housing for years, filling the financial gap by outright contribution or through subsidization has become a central policy, state or local governments try in order to create additional affordable housing. Several high cost, low vacancy markets, which also maintain the highest numbers of people experiencing homelessness, have tried to address these issues in the following ways—

Using public land to lower overall cost of affordable housing development.

Example: California is actively inventorying surplus state land to develop affordable housing. Every state should be required by HUD to delegate this task to local municipalities to do the same. The interest list in California has already drawn developers committed to building if the land was made available.

https://www.housingfinance.com/developments/california-moves-to-create-affordable-housing-on-surplus-land_o?utm_source=newsletter&utm_content=Article&utm_medium=email&utm_campaign=AHF_012920&

Redeveloping public housing but requiring it remain available to HCV holders, Project Based voucher holders, and the lowest income individuals.

Example: PHAs have inventory of their public housing, and states can implement coordinated redevelopment of these units. Florida and several other places have turned to redeveloping their public housing. It should be required to set aside a portion of these newer units to serve specific “target populations”.

https://www.housingfinance.com/finance/public-housing-authority-to-replace-aging-florida-development_o?utm_source=newsletter&utm_content=Article&utm_medium=email&utm_campaign=AHF_012920

Creating additional funding at the state level. These funding mechanisms have been used in combination with federal funding to develop affordable housing that can be accessed by veterans exiting homelessness.

Funding: California (VHHP) Veterans Housing and Homelessness Prevention Program has been in place for several years. This program has funded thousands of affordable housing units serving the lowest income populations.

<https://www.calvet.ca.gov/VHHP>

Place absolute caps on housing permits that will be issued for housing that is not affordable.

Example: Some building and inspection departments, in coordination with planning departments, establish an absolute maximum on permits that can be issued, with special exception given to affordable housing products. Limiting the permits for nonmarketable products in conjunction with increased permitting for

affordable developments can help shift focus to meeting community affordability needs.

<http://www.tompsc.com/DocumentCenter/View/28046/2018-Building-Permit-Allocation-System-Ordinance-Draft-for-110518-mtg-103018?bidId=>

Furthermore, by addressing local barriers and obstacles, efforts that are made at the state and national level do not hit a dead end once they reach planning departments in cities and counties. One way communities have found success in addressing these barriers, therefore easing housing delivery, is by challenging long standing building traditions through zoning and permitting in the following ways—

Adapting building codes that do not limit traditional single-family zoning to one housing unit per lot by either allowing ADUs, multiple smaller units or subdividing housing. Additionally, limiting the areas where higher density zones can accommodate “up to that density” or lower density uses, and instead zone for density minimums.

Example: Los Angeles County outright allows for ADUs; most places do not.

<https://salud-america.org/could-accessory-dwelling-units-help-affordable-housing-crises/>

http://planning.lacounty.gov/luz/summary/category/residential_zones

Example: In Denver, building codes are adapted to allow for multiple smaller homes on single lot. Homes of this nature can push back on some of the “NIMBY” feedback communities often face when developing large multi-unit developments.

<https://www.thedenverchannel.com/news/our-colorado/boulder-city-council-updates-building-code-to-allow-tiny-homes-in-residential-areas>

“By Right” zoning which allows for less cumbersome development approval processes. This should be required in areas struggling to maintain a balance between their single-family zoning and higher density housing zones.

Example: Zoning that allows for housing by right instead of having to go through traditional approval process can be found in counties throughout the Bay Area.

<https://www.cnu.org/publicsquare/2016/12/07/how-get-right-zoning-right>

Zoning overlay specifically for affordable housing.

Example: Cambridge Massachusetts is considering an 100% affordable housing zoning overlay which would alleviate burden to affordable housing developers by offering density bonuses, reducing superfluous regulations and only requiring design review, not a full approval process.

<https://www.cambridgema.gov/CDD/Projects/Housing/affordablehousingoverlay>

Fast tracking affordable housing permits.

Example: Atlanta is considering fast tracking building permits for affordable housing development. Local planning departments should be required to formulate a process which speeds up permitting for affordable housing development.

<https://saportareport.com/affordable-housing-may-get-fast-tracked-in-atlantas-building-permit-office/>

Cities and states hold the biggest opportunity to alleviate the burden affordable housing developers are experiencing. However federal oversight is necessary to maintain coordination that right now is self-managed, elective and unique to certain communities.

HUD administering programs and policies that offer connectivity between affordable housing needs, developments and the rest of the community would reduce barriers to affordable housing development—

Requiring states to develop a (uniform) data sharing tool that maintains an inventory of affordable housing in the pipeline.

In the early 90s, HUD developed a funding stream for the creation of a “community development needs computer database”. The purpose was to further coordinate local governing strategies and community development needs within states. In the private market, there are several companies that monitor housing supply by tracking the starts, construction timelines, closings, completion dates, unit breakdowns, sales trends, inventories and nonmarketable products. There needs to be a priority in developing this type of data around affordable housing and sharing it in a way that the public, for-profit companies, nonprofits and neighboring communities can use it without having a comprehensive background in planning or policy.

Requiring HUD dollars to be connected to investment in transportation, through coordination with DOT, and vice versa.

Through the longstanding requirements contained in states’ consolidated plans, there should be built-in incentive to invest in housing where transportation not only exists but is also subsidized. Several states use their QAP to evenly spread tax credits throughout the state, to not concentrate funding for affordable housing in urban areas on in the same rural counties perpetually. However, barriers to create affordable housing that is accessible to the lowest income individuals, or individuals located in a rural setting, are directly related to transportation accessibility. Additionally, ridership shapes transportation routes and service frequency. Not all those living in subsidized housing can afford their public transportation costs. For example, more incentives should be given to develop properties in areas where there is additional subsidy for public transportation users. Increased funding from federal means should be tied to local subsidy for transportation costs.

Example: New York <https://www.visn2.va.gov/vet/transportation.asp>

Funding “Priority Development Area Planning” at a state level

The Bay Area, for example, has established PDAs which essentially serve as a sustainability tool, to create denser communities in areas that already have deep investment in infrastructure and development. The purpose of creating these districts at a state level, and using housing needs to determine priority, would be to educate multiple industries on where exactly the perfect environment exists to create affordable housing that is also transit-oriented. Grants and funding are then directed at these specific locations. One of the ways HUD can facilitate this type of program for multiple states facing housing shortages is following in the Bay Area's program development, offering technical assistance in identifying and implementing plans for these areas.

Example: <https://mtc.ca.gov/our-work/plans-projects/focused-growth-livable-communities/priority-development-areas/call>

The effects of these types of programs and policy changes have social implications far beyond simply easing the development process. Having affordable housing options for vulnerable populations, like veterans exiting homelessness, should not be a question of public approval and funding possibilities. Veterans exiting homelessness, and reaching stability, belong in the communities they have aged in, served in and culturally contributed to. Numerous communities are committed to providing long term affordable housing options to veterans, but coordination at all levels of planning and development must be required and encouraged.

At the community level, there is ample funding for service provision and operational expense to assist veterans experiencing homelessness. However, we are seeing increased interest in shifting capital to provide funding that can create a suitable pipeline of long term, affordable housing, accessible to veterans. The National Coalition for Homeless Veterans is actively working with the VA in the hopes of developing a capital grant program that would be available to developers willing to build affordable housing specifically accessible to veterans. We would hope to create some form of funding that, coupled with planning and zoning, priority permitting and other state and local initiatives aimed at developing affordable housing, can deliver the options veterans exiting homelessness so desperately need. Meeting the affordable housing needs of every individual is only possible with collective action and diligent commitment from parties at the local, state, and federal level. Though individual localities and states have become creative in trying to develop more affordable housing, some of these practices should become a normality. The only way this is possible is through coordinating and sharing these efforts until they become familiar and eventually making what works become required.

Thank you for the opportunity to comment on this issue. Furthermore, thank you for elevating the discussions surrounding affordable housing.

Respectfully,

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