



September 9, 2014

Regulations Division
Office of the General Counsel
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0001

Docket No.: FR-5578-P-01 –Streamlining Requirements Applicable to Formation of Consortia by Public Housing Agencies

To Whom It May Concern:

Enterprise Community Partners (Enterprise) appreciates the opportunity to comment on HUD's proposed rule on Streamlining Requirements Applicable to Formation of Consortia by Public Housing Agencies. Enterprise is a national nonprofit organization whose mission is to create opportunity for low- and moderate-income people through affordable housing in diverse, thriving communities. We work to achieve this by introducing solutions through cross-sector public-private partnerships with financial institutions, governments, community organizations and other partners that share our vision. Since 1982, Enterprise has raised and invested \$16 billion to help finance nearly 320,000 affordable homes across the United States.

Enterprise has an interest in increasing opportunities to create consortia that would allow Public Housing Agencies (PHA) to pool their Section 8 Housing Choice Vouchers (HCV). First, as a generational goal, Enterprise and its partners are committed to ending housing insecurity in the United States. By 2020, Enterprise is committed to provide opportunity to 1 million low-income families through quality affordable housing and connections to good schools, jobs, transit, and health care. We believe that opportunity begins when people have a safe, healthy, and affordable place to call home. It grows with access to jobs, good schools, transit and health care. With over three decades of experience, we've learned that housing insecurity ends with homes that are: affordable, available, healthy, and connected.

To that end, the proposed rule supports the goal of ending housing insecurity especially by increasing the availability of affordable housing and housing choice in a regional context where families can be better connected to jobs, health care facilities, good schools, and better transit options.

Denver is one example where Enterprise is working to increase housing choice near transit. Funded by the Ford Foundation, Enterprise, the Urban Land Conservancy, the City and County of Denver, and several other investors have partnered to establish the first affordable housing Transit-Oriented Development (TOD) acquisition fund in the country. The purpose of the Denver TOD Fund is to support the creation and preservation of over 1,000 affordable housing units through strategic property acquisition in current and future transit corridors. To date, eight properties have been acquired using the \$15 million TOD Fund, creating a pipeline to preserve or create 626

affordable homes, 120,000 square feet of commercial space for community assets such as: a new public library, a child care program, a theater company and affordable space for nonprofits.

These efforts are yielding modest results. Without further intervention, the Denver region faces increasing suburbanization of poverty and decreasing access to transportation and opportunity more generally for low and moderate income people.

With these challenges in mind, Denver regional partners including the HUD Regional Office, Colorado Division of Housing, Colorado Housing and Finance Authority, Denver Regional Council of Governments and the City administrations and housing authorities most impacted are considering participation in HUD's Regional Housing Choice Voucher Program Pilot. The goal of the Denver region's participation in this pilot effort would be to allow project based and individually allocated vouchers to more predictably be used in transit oriented neighborhoods. While Enterprise and its partners are developing this proposal, the timely implementation of the proposed rule would provide PHAs in the Denver region a greater opportunity to implement this pilot program.

Enterprise also supports implementation of the proposed rule because it reduces portability requirements between PHAs and lessens administrative burden on PHAs. Enterprise is supportive of the creation of the new category of consortia known as single-Annual Contributions Contract (ACC) consortium. While Multiple-ACC contract consortia have increased PHA flexibility by allowing them to retain its ACC and program payments to a lead agency, the Single-ACC consortia create a greater opportunity for integration of PHAs by allowing them to work as one agency for the purposes of pooling Section 8 Housing Choice Vouchers.

Enterprise supports regional efforts to pool and manage Section 8 vouchers that better reflect the realities of regional economies where job opportunities may be far from the PHA boundary where the resident is currently living. By erasing jurisdictional boundaries, residents are better able to match their housing choice with their job, thereby decreasing transportation costs and increasing their quality of life with better opportunities for health care and schools. Helping erase these boundaries will create greater housing choices for low-income families, many of whom are minorities.

While the statute does not allow Moving to Work (MTW) agencies to participate in Single-ACC consortia, Enterprise does encourage HUD to consider rulemaking that would allow MTW agencies to participate in partial consortia that would allow greater flexibility and eliminate some of the mobility issues created by partial consortia. Enterprise recommends studying the results of these new forms of consortia once implemented to determine if there are improved outcomes to job access and housing choice.

Enterprise also supports HUD's efforts to create greater flexibility in Single-ACC consortia through the use of Fair Market Rent (FMR) blended rate within a consortium's region. FMR blended rates will make it easier for families to find housing across a region. In the same vein, defining a region where a consortium could be formed should follow the more frequently accepted term defined by the Census rather than HUD's more generic term. HUD's definition of a "large geographic area" should reflect the Census's definition of Standard Metropolitan Areas (SMA)

which define population centers that have a greater degree of economic and social integration with a core.

Overall, Enterprise is supportive of the proposed rule because increased flexibility for PHAs to form consortia will increase housing choice for families. Greater housing choice can help families decrease transportation costs, find better schools for their children, and better access to health care and other services that will help low-income families have a greater quality of life. At the same time, eliminating these boundaries will help to affirmatively further fair housing by helping to decrease concentration of poverty and artificial boundaries that may limit opportunity for many minority families. We urge HUD to implement this proposed rule without delay so that PHAs interested in forming consortia can do so expeditiously.

If you have any questions regarding these comments, please contact Manuel Ochoa, senior analyst and project director, at (202) 407-8715.

Sincerely,

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Diane Yentel

Vice President, Public Policy and Government Affairs