



July 16, 2021

Department of the Treasury  
Office of the Undersecretary for Domestic Finance  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

Re: Docket No. TREAS-DO-2021-0008  
Coronavirus State and Local Fiscal Recovery Funds  
31 CFR Part 35

Dear Undersecretary:

Housing Action NH is a statewide coalition of 80 organizations dedicated to improving state and federal policy so everyone in New Hampshire has a place to call home. We count among our members those who build, manage and finance affordable housing properties, homeless services agencies, public housing authorities and advocates for low income and vulnerable populations.

Thank you for the opportunity to comment on the interim final rule for the Coronavirus State and Local Fiscal Recovery Funds. This infusion of funding through ARPA's Fiscal Recovery Fund presents a significant opportunity for New Hampshire communities to start to address the severe shortage of affordable housing. According to the most recent residential rental costs survey completed by our state housing finance agency, New Hampshire now has a statewide vacancy rate of under 1%, resulting in a 24% increase in rental costs. Since wages have not kept pace with these increasing rental costs, the existing market is creating an unprecedented financial burden on our state's renters. According to National Low Income Housing Coalition's 2021 *Out of Reach* data, New Hampshire's housing wage is now at \$24.77 per hour and the 13<sup>th</sup> most expensive in the nation.

#### **Defining "Development of Affordable Housing"**

We urge Treasury to more fully define "development of affordable housing" in the final rule to mean the construction, preservation, operation or rehabilitation of rental and for-sale housing affordable to low and moderate income households, including homeless, chronically homeless and people with disabilities. We also urge Treasury to require the longest possible affordability period.

## Housing Development Beyond Qualified Census Tracts

We strongly urge Treasury to allow for the construction of new affordable housing beyond Qualified Census Tracts (QCTs). In a state like New Hampshire, low income families live throughout the state and struggle with finding housing they can afford. QCTs are extremely limiting for affordable housing development. There are only 11 designated Qualified Census Tracts in New Hampshire (out 295 total census tracts) and these QCTs address a total population of only 46,400, or 3.4% of the state's population.

Rather than relying primarily on QCTs, state and local governments should be encouraged to consider factors that are more likely to reflect affordable housing needs in an area. QCTs could be considered a priority for states. However, there should be opportunity to develop beyond QCTs with regional focus on moving to opportunity, access to services, and employment.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "EM", with a stylized flourish at the end.

Elissa Margolin, Director