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January 29, 2010

Regulations Division  
Office of General Counsel  
Department of Housing and Urban Development  
451 Seventh Street, S.W. Room 10276  
Washington, D.C. 20410-0500

RE: Docket Number FR-5246-P-01, "Housing Trust Fund; Allocation Formula

Dear Counsel:

The National Low Income Housing Coalition (NLIHC) is a membership organization whose members include residents of public and assisted housing and their organizations, state and local housing coalitions, nonprofit housing providers, homeless service providers, fair housing organizations, housing researchers, public housing agencies, private developers and property owners, local and state government agencies, faith-based organizations, and concerned citizens. While our members include the wide spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we focus exclusively on what is in the best interests of people who receive and those who are in need of federal housing assistance.

NLIHC fully endorses the proposed rule for implementing the National Housing Trust Fund's (NHTF) formula for distributing NHTF dollars to the states, District of Columbia, and insular areas. The proposed rule is consonant with both the letter and spirit of the enabling legislation.

NLIHC is particularly pleased with the proposed weights assigned to the formula factors established by the statute because those weights reflect the statute's focus on addressing the pressing needs of renter households with extremely low incomes. Assigning a weight of 50% to factor one (the shortage of rental units for households with extremely low income) properly addresses the statute's charge to "give priority emphasis and consideration" to that factor. In addition, assigning a weight of 25% to factor three (renter households with extremely low incomes experiencing "housing problems") is warranted because such a weight reinforces the charge attendant to factor one since factor three echoes the "standard rental units" and "affordable" components of factor one.

NLIHC supports this proposed rule and looks forward to working with HUD to implement the National Housing Trust Fund.

Sincerely,

A handwritten signature in black ink that reads "Sheila Crowley".

Sheila Crowley  
President