



September 2, 2025

Dear Member of Congress:

The undersigned national real estate associations and organizations represent a broad coalition of housing providers and advocates that are committed to working together with policymakers and the Administration to address America's housing affordability crisis. Congress, the Trump Administration, regulators, housing providers, lenders, and other stakeholders must join together to pursue bipartisan solutions that remove the barriers to developing and preserving the housing that is needed at all price points.

The undersigned organizations stand ready to help meet the rising need for attainably priced housing, but we cannot do it alone. Reducing the cost of housing requires a strong partnership between the private and public sectors.

First and foremost, we must seek solutions that support increased supply—at all price points. Without investment in our nation's housing, we will face housing instability and affordability challenges now and in the future. In addition to spurring all types of housing, we must also deliver short-term solutions to renter populations who need assistance. Increased subsidies and emergency housing support for those of modest means are critical to keeping struggling families afloat. Policies that shift the full burden of increased costs onto housing providers, however, will only exacerbate the lack of available and affordable rental housing for that population. Burdens on housing providers stall new development and cause existing housing providers – especially smaller providers who own just a few units – to leave the market entirely. In short, we must address the cost of building and maintaining housing through needless regulations and administrative burdens.

While it is critical that we continue to enact policies that will incentivize new housing production and preservation, we applaud Congress for already taking a significant step in recently enacted

legislation that would substantially enhance the Low-Income Housing Tax Credit and finance up to 1.22 million additional affordable rental homes.¹

We also commend the Senate Committee on Banking, Housing, and Urban Affairs for unanimously approving the *Renewing Opportunity in the American Dream (ROAD) to Housing Act of 2025* on July 29 that would help address our nation's housing supply shortage. The Committee-approved measure includes several pieces of legislation that we strongly support, including: *Build More Housing Near Transit Act of 2025*, *Housing Supply Frameworks Act*, *Accelerating Home Building Act of 2025*, *HOME Investment Partnerships Reauthorization and Improvement Act of 2025*, and *Housing Affordability Act*, as well as critical reforms in the *Choice in Affordable Housing Act of 2025*, described below.

We recommend Congress as a whole build on these successes and immediately move forward on the following measures that would go a long way to increasing the nation's housing supply and, therefore, have a positive impact on the housing affordability crisis:

Build More Housing Near Transit Act: Bipartisan legislation led by Representatives Peters (D-CA) and Moore (R-UT) (H.R. 4576) and Senators Schatz (D-HI) and Banks (R-IN) (S. 2363) would direct the Department of Transportation (DOT) to incentivize local governments to promote housing development and regional growth in and around the transit corridors.

Housing Supply Frameworks Act: Bipartisan legislation sponsored by Representatives Flood (R-NE) and Pettersen (D-CO) (H.R. 2840) and Senators Blunt Rochester (D-DE), Crapo (R-ID), Fetterman (D-PA), and Tillis (R-NC) (S. 1299) would direct HUD to publish guidelines and best practices for State zoning and local zoning frameworks.

Accelerating Home Building Act of 2025: Senators Blunt Rochester (D-DE) and Moreno (R-OH) have introduced legislation (S. 2361) to overcome local regulatory cost burdens to affordable housing development by encouraging the use of pattern books of pre-reviewed construction designs. Specifically, the bill would establish a HUD-administered grant program to fund the creation of pattern books with a focus on missing middle and infill construction and provide set asides for rural communities and prioritizes high opportunity areas and localities working to reduce barriers to housing development.

HOME Investment Partnerships Reauthorization and Improvement Act of 2025: Legislation introduced by Senator Cortez Masto (D-NV) (S. 948) and Representative Beatty (D-OH) (H.R. 2031) would reauthorize the HOME Investment Partnerships Program, and make program improvements such as a \$5 billion authorized funding level, inclusion of small-scale housing, and clearer inspection requirements.

Housing Affordability Act: Bipartisan legislation (S. 1527) introduced by Senators Gallego (D-AZ) and McCormick (R-PA) would increase the per-unit loan limits on certain FHA multifamily insured properties.

Choice in Affordable Housing Act of 2025: Bipartisan legislation introduced by Senators Coons (D-DE) and Cramer (R-ND) (S. 890) and Representatives Cleaver (D-MO)

¹ <https://www.novoco.com/notes-from-novogradac/senate-finance-committee-releases-fy-2025-budget-reconciliation-bill-that-includes-permanent-lihtc-expansion-novogradac-estimates-122-million-additional-affordable-rental-homes-over-2026-2035>

and Lawler (R-NY) (H.R. 1981) would address many overlapping and redundant programmatic procedures that have deterred owners and operators from participating in the Section 8 Housing Choice Voucher Program. The bill enjoys broad support from both housing advocates and housing providers.

Rural Housing Service Reform Act: Bipartisan legislation introduced by Senators Smith (D-MN) and Rounds (R-SD) (S. 1260) and Representatives Nunn (R-IA) and Cleaver (D-MO) (H.R. 4957), the *Rural Housing Service Reform Act*, would, if passed by Congress, be instrumental in preserving the affordable multifamily housing stock in many rural communities throughout the country. The legislation would provide owners with tools they currently do not have and, at the same time, assure residents that they will continue to have an affordable place to call home. Provisions in the bill will allow the Rural Housing Service to more effectively address the housing needs of both the providers and residents who live in this vital housing.

Identifying Regulatory Barriers to Housing Supply Act: Bipartisan legislation sponsored by Senators Young (R-IN) and Schatz (D-HI) (S. 2416) and Representatives Flood (R-NE) and Pettersen (D-CO) (H.R. 4659) would help eliminate discriminatory land use policies and remove barriers that depress production of housing in the United States. By requiring Community Development Block Grant (CDBG) recipients to report periodically on the extent to which they are removing discriminatory land use policies, and promoting inclusive and affordable housing, the *Identifying Regulatory Barriers to Housing Act* will increase transparency and encourage more thoughtful and inclusive development practices.

HOME Reform Act of 2025: Representatives Flood (R-NE) and Cleaver (D-MO) have released a draft HOME Investment Partnership program (HOME) bill that would expand income eligibility, expand eligible uses of funds to include infrastructure and reduce Davis-Bacon, National Environmental Policy Act (NEPA) and Build America, Buy American Act (BABA) requirements to speed and increase development of affordable housing.

TIFIA Reform: The Transportation Infrastructure Finance and Innovation Act (TIFIA) provided the Department of Transportation (DOT) \$70 billion in below-market lending authority for, among other things, transit-oriented development, including for housing near public transit. TIFIA could be a significant tool to increase housing supply, but it currently requires transportation underwriting standards that are not applicable to housing development. TIFIA must be reformed to include housing underwriting standards to reach its full potential.

HUD Funding: The T-HUD Appropriations bill provides critical funding for the development and operation of public/private affordable housing developments throughout the country. It is critical that HUD's programs, such as Housing Choice Vouchers, Project-Based Rental Assistance, and HOME get full funding in the Fiscal Year 2026 T-HUD appropriations bill to give the private sector confidence to invest in these critical resources.

Electronic Benefit Transfer (EBT) for Rental Housing Vouchers: We encourage Congress to establish a pilot program converting Housing Choice Vouchers (HCVs) to an electronic benefit transfer program without HUD lease and inspection requirements to

make HCV recipients indistinguishable from other renters while better combatting waste, fraud, and abuse.

Workforce Housing Tax Credit Act: Bipartisan legislation introduced in the 118th Congress by Senators Wyden (D-OR) and Sullivan (R-AK) (S. 3425) and Representatives Panetta (D-CA) and Carey (R-OH) (H.R. 6686) would establish a new tax credit to produce affordable rental housing for households earning 100 percent or less of the area median income (AMI). The *Workforce Housing Tax Credit Act*, which is modeled on the successful Low-Income Housing Tax Credit, would address the housing shortage for individuals who comprise the very fabric of strong communities nationwide, including teachers, firefighters, nurses, and police officers whose wages are not keeping pace with costs.

Incentivize Conversion of Underutilized Commercial Properties: Given the nation's shortage of affordable rental housing, many are considering turning unused and underutilized commercial real estate structures, including offices, hotels, and retail spaces into housing. Not only would such repurposing help address the nation's housing supply challenge, but it would also create jobs and boost local property tax revenues. Representatives Carey (D-OH) and Gomez (D-CA), joined by 29 other cosponsors, have introduced the *Revitalizing Downtowns and Main Streets Act* (H.R. 2410) that would provide a 20 percent tax credit to convert office buildings into affordable rental housing.

Enhance Opportunity Zones to Incentivize Rehabilitation of Housing Units: The real estate industry is extremely grateful Congress permanently reauthorized Opportunity Zones in recently enacted tax legislation. While Opportunity Zones are beneficial for new multifamily development, developers may find it difficult to use Opportunity Zone benefits to rehabilitate existing properties.

To qualify for Opportunity Zone benefits for renovations, the basis of an existing asset must generally be doubled excluding land. However, beginning with second-round Opportunity Zones in rural areas, the basis increase necessary is reduced to 50 percent. Although property that is added to and improves an asset can count toward this threshold, doubling the basis can still be a high hurdle.

To promote the rehabilitation and preservation of multifamily housing in all Opportunity Zones nationwide, Congress should reduce the basis increase necessary to qualify a multifamily rehabilitation project for Opportunity Zone purposes to no higher than 50 percent. This step would maximize the ability of Opportunity Zones to address the nation's housing supply shortage.

Neighborhood Homes Investment Act: Bipartisan legislation sponsored by Senators Young (R-IN) and Warner (D-VA) (S. 1686) and Representatives Kelly (R-PA) and Larson (D-CT) (H.R. 2854) would create a tax credit to support the construction or rehabilitation of housing for affordable homeownership. The *Neighborhood Homes Investment Act* is the affordable homeownership supply solution we need to give Americans the opportunity to own a home in the communities where they live and work.

Conclusion

Housing has always been a bipartisan issue. Policymakers at every level of government have a role to play in removing obstacles to housing production and preservation and in addressing the housing affordability challenges that have faced this country for decades.

Across all markets, a robust housing supply at a variety of price points will play a vital role in promoting economic growth, attracting and retaining talent, and encouraging household stability for all American families. Using a combination of incentive-based programs, streamlined regulatory burdens and innovative solutions, we stand ready to work with Congress and the Administration to address the housing affordability challenges faced by communities across the nation.

Sincerely,

American Land Title Association
American Seniors Housing Association
Commercial Real Estate Finance Council
Council for Affordable and Rural Housing
Housing Advisory Group
ICSC
Institute of Real Estate Management
Leading Builders of America
Mortgage Bankers Association
NAIOP, the Commercial Real Estate
Development Association
Nareit
National Affordable Housing Management
Association
National Apartment Association

National Association of Affordable Housing
Lenders
National Association of Home Builders
NATIONAL ASSOCIATION OF
REALTORS®
National Association of Residential Property
Managers
National Housing Conference
National Leased Housing Association
National Multifamily Housing Council
Real Estate Technology & Transformation
Center
The Real Estate Roundtable
Up For Growth Action