



January 13, 2019

The Honorable Denny Heck  
2452 Rayburn House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Trey Hollingsworth  
1641 Longworth House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Mike Quigley  
2458 Rayburn House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Jaime Herrera Beutler  
2352 Rayburn House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Lacy Clay  
2428 Rayburn House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Virginia Foxx  
2462 Rayburn House Office Building  
United States House of Representatives  
Washington, DC 20515

Dear Representatives Heck, Hollingsworth, Quigley, Herrera Beutler, Clay and Foxx,

Recent legislation has been proposed - the Yes in My Backyard Act (YIMBY Act) - to improve preservation and development of affordable housing throughout the nation. The bill would require Community Development Block Grant (CDBG) recipients to report on local activities to increase affordable housing. Although efforts to respond to the shortage of housing units is a welcomed effort, the YIMBY Act would add unnecessary strain to state and local grant administration.

As proposed, the YIMBY Act introduces new duties for states and localities with most experiencing staff shortages and few resources. The state CDBG program invests funds in economic and community development initiatives, primarily in small and rural communities. Both cities and counties operate active grants with their respective state which could amount to several dozen in a given year. State administrators must navigate a host of program requirements including environmental reviews and labor regulations. However, limited capacity exists across state agencies to handle even these tasks due to the stagnant availability of federal funding and existing cap on administrative funds to states. The introduced legislation is well-intended in promoting affordable housing. However, the bill's reporting requirement would further burden states and localities in program administration.

It is absolutely clear - federal response is desperately needed to increase the affordable housing stock. Programs such as CDBG, HOME Investment Partnerships (HOME), and Housing Trust Fund (HTF) have proven to preserve and produce units. Years of underinvestment though have left many communities with limited means to further affordable housing. Local reforms such as

changes to zoning policies may progress housing access but only incrementally. Substantial public and private investment remains key to facilitating affordable housing developments.

COSCOA urges reconsideration of the legislation as proposed and recommends strengthening resources to support state and local housing initiatives. We offer our assistance in assessing proposals especially from a state perspective. Please reach out if we can provide any further information or clarification on the YIMBY Act or state's efforts on affordable housing. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianne E. Taylor". The signature is fluid and cursive, with a large initial "D" and "T".

Dianne E. Taylor  
Executive Director