



The Honorable Tim Scott  
Chairman, Senate Committee on Banking,  
Housing, and Urban Affairs  
U.S. Senate  
Washington, D.C. 20510

The Honorable French Hill  
Chairman, House Committee  
on Financial Services  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Elizabeth Warren  
Ranking Member, Senate Committee on  
Banking, Housing, and Urban Affairs  
U.S. Senate  
Washington, D.C. 20510

The Honorable Maxine Waters  
Ranking Member, House Committee on  
Financial Services  
U.S. House of Representatives  
Washington, D.C. 20515

March 23, 2026

Dear Chair Scott, Ranking Member Warren, Chair Hill, and Ranking Member Waters,

We, the undersigned members of the national HOME Coalition and its allies, applaud your work on the *21<sup>st</sup> Century ROAD to Housing Act (ROAD)* and the *Housing for the 21<sup>st</sup> Century Act*. The provisions included in Section 502 of *ROAD*, the *HOME Investment Partnerships Reauthorization and Reform Act*, would modernize HUD's HOME Investment Partnerships Program (HOME) and meaningfully support the nation's affordable housing supply.

**As the two chambers move forward with housing legislation, we strongly urge the inclusion of the remaining *HOME Reform Act* provisions from Section 201 of the *Housing for the 21<sup>st</sup> Century Act*.** Specifically, we support Section 201's language related to Build America, Buy America (BABA) and environmental review requirements. The HOME Coalition worked in close consultation with Congressman Flood and Congressman Cleaver on *HOME Reform Act* language. We believe these two provisions would streamline HOME requirements to allow for more affordable housing development, given current development realities.

HOME is HUD's flagship affordable housing production program. For more than three decades, it has been one of the most effective and flexible tools states and localities have to meet their affordable housing needs, including rental home production and preservation, single-family home construction, homeowner rehabilitation, and tenant-based rental assistance. Since 1992, HOME has supported over 1.39 million units of affordable housing. Despite the program's success, Congress has not modernized HOME since its passage over 30 years ago. HOME reform is critically needed and broadly supported.

#### Build America, Buy America (BABA)

Although our organizations support American manufacturing and the intent behind BABA, HUD's implementation of BABA is not responsive to the realities of the affordable housing industry and has been **unworkable** for HOME projects. HUD has issued public-interests waivers intended to ease the impact of BABA where American-made materials are unavailable or would require unreasonable costs. However, the waiver process remains underdeveloped and can take upwards of 6 months to a year for approval. **For these reasons, we urge Congress to include**

**the language below directing HUD to review its implementation of BABA and reissue BABA guidance as it relates to the HOME program.**

Application of Build America, Buy America Requirements for HOME Investment Partnerships Program.—

- (1) In General—Not later than 180 days after the date of enactment of this section, the Secretary of Housing and Urban Development shall complete a review of the implementation of the Build America, Buy America Act (title IV of division G of Public Law 117-58; 42 U.S.C. 8301 note) with respect to the activities assisted under title II of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12721 et seq.).
- (2) Updated Guidance—Not later than 90 days after the review described in subsection (a) is completed, the Secretary shall issue updated guidance to clarify the application of the Build America, Buy America Act (title IV of division G of Public Law 117-58; 42 U.S.C. 8301 note) with respect to the activities assisted under title II of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12721 et seq.).
- (3) Report—Not later than 270 days after the date of the enactment of this section, the Secretary shall submit to the Committee on Financial Services of the House of Representative and the Committee on Banking, Housing, and Urban Affairs of the Senate a report that describes—
  - a. The results of the review required under subsection (a); and
  - b. The guidance issued as described in subsection (b).

#### Environmental Review

HUD’s National Environmental Policy Act (NEPA) requirements can be overly burdensome and often contribute to HOME project delays. For example, if a HOME project seeks additional HUD resources to fill a financing gap after the project has already undergone an environmental review, the use of the additional resource(s) triggers a subsequent, duplicative environmental review, restarting the entire process and putting any further activity on hold until it is cleared a second time. **We urge the inclusion of the following “removing duplicative reviews” language from the *HOME Reform Act* to mitigate project delays due to the complex capital stacks found in HOME projects.**

Removing Duplicative Reviews—

- (1) In General—To the extent practicable and permitted by law, the Secretary shall ensure that a project that undergone an environmental review under this section shall not be subject to a duplicative environmental review solely due to the addition, substitution, or reallocation of other sources of Federal assistance, if the scope, scale, and location of the project remain substantially unchanged.
- (2) Coordination of Environmental Review Responsibilities—The Secretary shall, by regulation, provide for coordination of environmental review responsibilities with other Federal agencies to streamline inter-agency

compliance and avoid unnecessary duplication of effort under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.

- (3) Recognition of Prior Reviews by Responsible Entities—A project may not be subject to an environmental review under this section if a substantially similar review has already been completed by an entity designated under section 104(g)(1) of the Housing and Community Development Act of 1974 (42 U.S.C 5304(g)(1)) or by another entity the Secretary determines to have equivalent authority, if the scope, scale, and location of the project remain substantially unchanged.

Further, although we believe the contents of Sec. 208 of *ROAD—the Unlocking Housing Supply Through Streamlined and Modernized Reviews Act*—would benefit the HOME program, **we urge the inclusion of NEPA categorical exemption language from the *HOME Reform Act* that was specifically crafted to address environmental review challenges for the HOME program.**

Environmental Review Requirements—

- (1) In General—Section 288 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12838) is amended by adding at the end the following:

- Categorical Exemptions—The following categories of activities carried out under this title shall be statutorily exempt from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C 4321 et seq.), and shall not require further review under such Act –
  1. New construction infill housing projects;
  2. Acquisition of real property for affordable housing purposes;
  3. Rehabilitation projects carried out pursuant to section 212(a)(1); and
  4. New construction projects of 15 units or less.

Thank you again for your efforts to address the nation’s housing affordability crisis through these landmark legislative packages. We strongly support HOME reform as a tool for developing the nation’s affordable housing supply. The HOME Coalition is available for further discussion regarding the contents of this letter.

Sincerely,

Affordable Housing Tax Credit Coalition  
Citizens’ Housing & Planning Association  
Community Solutions  
Corporation for Supportive Housing  
Council for Affordable and Rural Housing Association

Council of State Community Development Agencies  
Fahe  
Healthcare Anchor Network  
Housing Partnership Network  
Low Income Investment Fund  
Mercy Housing  
National Affordable Housing Management Association  
National Association of Local Housing Finance Agencies  
National Association for County Community and Economic Development  
National Association of Home Builders  
National Association of Housing and Redevelopment Officials  
National Association of REALTORS  
National Community Development Association  
National Council of State Housing Agencies  
National Housing Conference  
National Leased Housing Association  
National Multifamily Housing Council  
National NeighborWorks Association  
New England Housing Network  
Public Housing Authority Directors Association  
Stewards of Affordable Housing for the Future  
Vermont Housing and Conservation Board