



Council for Affordable and Rural Housing

Serving the Affordable Housing Needs of Rural America

March 10, 2022

Via Website Submission:

https://www.fhfa.gov/AboutUs/Contact/Pages/Request-for-Information-Form.aspx?utm_medium=email&utm_source=govdelivery

Federal Housing Finance Agency
400 7th Street, SW
Washington, DC 20219

Re: Strategic Plan for Fiscal Years 2022-2026

To Whom It May Concern:

The Council for Affordable and Rural Housing (“CARH”) provides its comments to the Strategic Plan for Fiscal Years 2022-2026. CARH represents for-profit and non-profit companies providing affordable rural rental housing throughout America. For over 40 years, CARH has served as the nation’s premier association for participants in the affordable rural housing profession, including builders, owners, developers, managers, non-profits, housing authorities, syndicators, accountants, architects, attorneys, bankers, and companies that supply goods and services to the industry. CARH is the only association that solely represents the needs of the entire rural affordable housing industry.

The need for affordable housing persists and it cannot be adequately addressed except through continuation and expansion of current delivery mechanisms. These mechanisms have been developed and made more efficient over decades of providing affordable housing. In rural areas throughout the country, there continues to be an even more acute need for affordable and decent housing. Rural renters are more than twice as likely to live in substandard housing compared to people who own their own homes. With lower median incomes and higher poverty rates than homeowners, many renters are simply unable to find decent housing that is also affordable. While the demand for rental housing in rural areas remains high, the supply, particularly of new housing, has decreased. Rural housing rental properties tend to be smaller than in other parts of the country. Apartment complexes will typically be much fewer than 50 units, and 50 units is typically considered to be small. As such, rural rental housing often has difficulty securing capital for construction or rehabilitation of existing properties.

America’s elderly, working families, civil servants, and working poor seek to live in or near their jobs, families and communities. In most of America this need cannot be met. Homeownership is out of reach or not financially viable. Indeed, the cost of providing any new housing or rehabilitating existing housing to current standards without public-private assistance is too expensive for most low-income Americans. Therefore, it is vital that the Enterprises continue with credit availability in rural areas in an amount at least as much as in recent years.

We appreciate that Objective 2.1: Promote sustainable access to mortgage credit contains as a goal credit for all qualified borrowers in rural areas. We would ask that be expanded to qualified borrowers and borrowers seeking to provide rental affordable housing. This would encompass the point that credit in rural areas can be hard to come by for home buyers but also for persons trying to preserve existing housing or build new housing in rural America.

We also appreciate that Objective 2.4: Facilitate greater availability of affordable housing supply, including affordable rental housing seeks to increase the supply of housing and to monitor the Enterprises' support of multifamily housing needs with a focus on affordable, underserved, and workforce segments of the market. We appreciate ongoing efforts. Consistent with our comment above, we believe that in order to address the market concerns we note above, the Objective should be clarified to support Enterprises efforts to work with financing in other federal affordable housing programs at the U.S. Department of Housing and Urban Development and U.S. Department of Agriculture, Rural Development as well as ongoing efforts in the Enterprises Duty to Serve programs including rural areas.

We respectfully submit the foregoing comments, and we appreciate your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Colleen M. Fisher". The signature is written in a cursive style with a large initial "C".

Colleen M. Fisher
Executive Director