

September 2, 2025

The Honorable E. Scott Turner
Secretary
U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410

The Honorable Andrew Hughes
Deputy Secretary
U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410

The Honorable Frank Cassidy
Principal Deputy Assistant Secretary for
Housing
U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410

Dear Secretary Turner:

I am writing on behalf of the undersigned affordable housing developers, owners, managers, and related trade associations to express our deep concern about the stalled processing of certain funding obligations previously awarded under HUD's Green and Resilient Retrofit (GRRP) program, particularly under the Comprehensive category. While the Department has continued to process certain types of awards, the largest funding allocations have stalled since January, despite judicial orders requiring HUD to resume processing. **We therefore urge the Department to urgently move forward with new guidance or direction necessary to process the transactions associated with the awards under the Comprehensive category.**

We know that you are working diligently to address the dearth of affordable housing in this country. For example, we greatly appreciate the Administration's recent action, consistent with HR 1, also known as the One Big Beautiful Bill, to double the amount of LIHTC investment by the GSEs that aims to expand affordable housing supply in rural and underserved communities across the nation.¹ We also strongly support and appreciate HUD's swift leadership to administer disaster assistance, financial flexibility for residents, properties, and communities impacted by recent natural disasters in several states.²

¹ FHFA press release: Consistent with the One Big Beautiful Bill, U.S. Federal Housing Expands America's Affordable Housing Supply in Rural and Underserved Communities (August 5, 2025)

² HUD press releases on June 18, 2025, July 5, 2025, and July 18, 2025

Our organizations remain committed to working with you to preserve and increase the supply of affordable housing across the country, including by creating new housing supply and by protecting the supply that already exists. We strongly believe that proceeding with processing the GRRP awards is the most cost-effective way to preserve the existing affordable Multifamily Housing stock and retrofit these properties to withstand future natural disasters.

Let us be clear: While the previous administration's messaging around GRRP focused on climate resiliency, these funds are critical to meet the basic preservation capital needs of an aging affordable housing stock. For many HUD-assisted Multifamily Housing properties, the financing provided and leveraged through GRRP represents the only dedicated federal resource currently available to support deeply needed recapitalization of our country's affordable housing stock.

These properties are home to some of the nation's most vulnerable residents – including older adults and people with disabilities - and in many cases, GRRP funding is the only viable path to preserving these homes and extending their affordability. The GRRP awards will provide necessary capital improvements and address deferred maintenance, like new windows, effective heating and cooling systems, elevator repairs, and tried-and-true disaster-resistant upgrades, like reinforced roofs in hurricane-prone areas. The funding also provides basic system updates for property safety and operations, like sprinkler systems in fire-prone areas and air conditioning in properties in the South.

Further, the program is highly effective at leveraging non-federal and non-HUD financing sources. For Comprehensive projects, the GRRP funds represent a fraction of the additional investment unlocked through the promise of the GRRP award.

The GRRP program was temporarily frozen pending the Administration's review and has subsequently been subject to a preliminary injunction, issued on April 15, 2025 in the case *Woonasquatucket River Watershed Council v. U.S. Department of Agriculture* in the U.S. District Court for the District of Rhode Island.

While we are pleased that the Elements and Leading Edge awards appear to be proceeding at HUD, the Comprehensive awards (which represents 67% of total GRRP funding – a far larger and more impactful amount) remain frozen. These Comprehensive awards are vital and will serve more than 10,000 residents across 104 properties, of which 25% are located in rural areas.

Multifamily Assessment Contracts (MACs), which had been part of HUD's framework for processing the Comprehensive awards, were cancelled, and the contract procurement funds have been rescinded under HR 1. HUD has the authority to simply update its guidance in H 2023-05, or to issue sub-regulatory guidance, to allow Comprehensive awards to proceed without the use of MACs, where either HUD or the awardees themselves take on the assessments and related activities previously handled by the MACs. Not moving forward, including failing to update guidance in a timely manner, risks breaching the legal obligation to fulfill the GRRP awards, harms the thousands of residents and owners relying on capital

improvements, and jeopardizes the hundreds of millions of LIHTC equity and other funds leveraged in these transactions.

The delays in releasing updated guidance, including allowing the predevelopment assessment requirements that were previously assigned to MACs to be streamlined and conducted internally, are creating significant uncertainty and putting urgently needed development and preservation efforts at risk. Without timely HUD action, the aligned investments of leveraged private and public financing may be lost, and development and preservation efforts abandoned.

We respectfully urge HUD to act swiftly to issue updated guidance or direction that allows awarded projects and transactions to move forward. Thank you for your attention to this urgent matter.

We stand ready to assist in supporting a successful rollout of GRRP and ensuring that this critical resource can meet the needs for today and tomorrow.

Sincerely,

Bon Secours Community Works

Capital Realty Group Inc.

Circ Living

Christian Church Homes (CCH)

Colony Retirement Homes

CommonBond Communities

East Boston Community Development Corporation

Elderly Housing Development and Operations Corporation

Homes for America

Institute for Responsible Housing Preservation

The ITEX Group

KCG Development, LLC

Lake Metropolitan Housing Authority

LeadingAge

LeadingAge PA

Madison Park Development Corporation
Mercy Housing
Methodist Senior Services
National Affordable Housing Management Association (NAHMA)
National Church Residences
National CORE
National Housing Trust
National Leased Housing Association (NLHA)
Neighborhood Concepts Inc.
Northeast Plaza Partners RLLP
Presbyterian SeniorCare
Preservation of Affordable Housing (POAH)
Providence Community Housing
Reach CDC
Resources for Community Development
Jack Satter House
Stewards of Affordable Housing for the Future (SAHF)
Transforming Age
The Towers at Tower Lane
Wazee Partners

cc: C. Lamar Seats, Tom Davis