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The City of Austin  
Neighborhood Housing and Community Development Office  
P.O. Box 1088  
Austin, Texas 78767

December 27, 2018

Re: Public Comment RHDA Application and Guidelines

To the City of Austin,

Thank you for the opportunity to comment on the RHDA Program Application and Guidelines. We appreciate the commitment from the City of Austin to the creation of units that will be available to the Continuum of Care. This year alone, 3,667 households experiencing homelessness completed Coordinated Assessment, and 3,165 are still waiting for a housing program slot to become available.

Without access to units in the community, we cannot do the work of ending homelessness in the Austin area.

We encourage the Guidelines to consistently refer to units that are created to house the households experiencing homelessness as Continuum of Care (CoC) units, to include Permanent Supportive Housing (PSH) and Rapid Re-housing (RRH) programs, as indicated on page 24 of the RHDA Guidelines. This would replace all references to exclusively just PSH or Housing First units. Agencies who serve people experiencing homelessness rely on both programs to provide affordable housing program support. Also, all CoC units, whether PSH or RRH would be required to be Housing First without income requirements since the household will be entering the unit with a rental subsidy.

In addition, we encourage the City to require a 20% set aside of units in every RHDA funded property. The need for Continuum of Care housing is so great, that with incentives alone, we will make slow progress towards our goals. With a set-aside we could allow the applicant to choose to dedicate (swap) those units with some on another property in their existing portfolio.

We also appreciate that the current guidelines and application incentivize applicants to create COC Units so that developers elect to create units that will serve the Continuum of Care population.

In return, the City could:

- Make public land available for these units
- Provide Property Tax Exemptions for Owners
- Expedite permitting
- Increase SMART Housing benefits to include additional fee waivers (such as Wastewater)
- Allow higher subsidy per unit for COC Units, or reduce leverage requirements



The City should remove the requirement for applicants to notify neighbors and neighborhood organizations, because if a proposed property meets current zoning requirements, there is no reason to apply a different standard than market rate housing for notification. This creates an unnecessary burden and potential obstacle to affordable housing development.

The City could consider lowering the subsidy of 50% of the cost of the unit in RHDA funds, in order to prevent burning through the funding too quickly without ensuring development of CoC units. Instead, consider offering up to 75% of the cost of a unit for CoC units as an incentive.

We are eager to co-host a training with the Austin Housing Coalition, recognizing the need to incubate and support the creation of more mission-driven developers willing and able to create units for vulnerable populations, including for those experiencing homelessness.

Sincerely,

A handwritten signature in cursive script that reads 'Ann Howard'.

Ann Howard  
Executive Director