Ms. Lourdes Castro Ramirez  
Principal Deputy Assistant Secretary for Public and Indian Housing  
U.S. Department of Housing and Urban Development  
451 Seventh Street, SW  
Washington, DC 20410

Dear Principal Deputy Assistant Secretary Castro Ramirez:

The National Association of Housing and Redevelopment Officials (NAHRO) represents more than 2,800 agencies and over 17,000 individual members and associates. Collectively, our membership manages over 970,000 public housing units, or approximately 83 percent of the entire inventory. NAHRO works to support policies that assist housing authorities to best meet the needs of their communities.

NAHRO respectfully requests that the Department provide an additional 30-day period for the solicitation of comment regarding HUD’s proposal for implementing the Public Housing income limit provision included in the Housing Opportunity Through Modernization Act of 2016 (81 FR 85996). In light of the complexity of HUD’s proposal and the significant number of Notices and Guidance that HUD has released in the past month, an additional period of 30 days to provide comments would be extremely helpful for NAHRO and its members. We are still working to determine the impacts of HUD’s proposal and whether the use of HUD’s calculation of very low-income (VLI) is the best mechanism to establish different income limitations based on local construction costs or unusually high or low incomes, vacancy rates, or rents. An additional 30 days will ensure enough time for NAHRO and its members to provide substantive, useful comments on HUD’s proposal.

Thank you for your consideration and please contact me if you have any questions.

Eric Oberdorfer  
Policy Advisor for Public and Affordable Housing

Stephen W. Merritt, PHM, President; Carl S. Richie, Jr., NCC, NAHRO Fellow, Senior Vice President; Julie Brewen, Vice President-International Research and Global Exchange; Donna Brown-Rego, Vice President-Member Services; Donovan Duncan, Vice President-Community Revitalization and Development; Duane Hopkins, Vice President-Professional Development; Richard Leco, PHM, Vice President-Commissioners; Regina Mitchell, SFHM, PHM, Vice President-Housing; John F. Bohm, Acting Chief Executive Officer.

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