

The Alliance

ADVANCING REGIONAL EQUITY



The Alliance Comments to SR 25-227 Amendments to QAP

The Alliance for Metropolitan Stability submits these comments to the St Paul Housing and Redevelopment Authority (HRA) regarding the proposed amendments to the 2026-2027 Qualified Action Plan (QAP) for Low-Income Housing Tax Credits (LIHTC).

The Alliance is a coalition of community-based organizations and advocacy groups with a mission to build power across the intersections of geography, race, culture, and issues in the Twin Cities region to eliminate systems of oppression and advance our collective liberation. We oppose the proposed changes to of Qualified Contract Process for LIHTC providers to be able to opt out of the affordability requirement after 15 years. The proposed changes would reduce the years of affordability required under the Qualified Contract Process from 30 years to 15 years.

We strongly believe this is the wrong action to take to encourage the development of more affordable housing. 30 years of affordability is vital for communities to be able to set their roots, as many folks raise their children from birth to 18 years old in their homes. 30 years of affordability provides that stability for families. 15 years of affordability doesn't cover the years a child needs to age in place to continue attending the same schools and district. We strongly believe that 30 years of affordability is vital for working families to stay stable and housed for prolonged periods of time. We shouldn't be discussing how we can incentivize more housing development by reducing accountability for developments that use public funds like LIHTC.

Public-funded projects must provide the most consistent and dedicated levels of affordability and habitability. We must be able to use these tools to ensure that public funds are being used to actually provide affordable housing to folks for a dedicated amount of time. Reducing the years of affordability for LIHTC properties from 30 to 15 years is regressive. It does not benefit the tenants who will live in these properties, and only serves to water down the already existing protections LIHTC residents have. If St. Paul were to reduce these commitments to affordability, we could potentially see the end of 30 years of affordability across the metro, as other cities could follow suit. This would be catastrophic for the region and the already struggling communities that live in and hope to live in a LIHTC property.

Minnesota is one of 39 other states that require LIHTC providers to waive the Qualified Contract Process. We believe it is essential to maintain consistency in this position and continue to prioritize the needs of renters who make our communities thrive. We must preserve 30 years of affordability and should not be entertaining a regression of affordability. Thank you for your consideration of these comments. Please, if you have any questions, reach out to Juanluis@thealliancetc.org

Best,

Juan Luis Rivera-Reyes - Housing Coalition Organizer at the Alliance for Metropolitan Stability