



The Honorable Janet Yellen
Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue N.W.
Washington, DC 20220

RE: Coronavirus State and Local Fiscal Recovery Funds Interim Final Rule
Comments [Docket: TREAS-DO-2021-0008]

July 16, 2021

The American Institute of Architects
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Dear Secretary Yellen,

The American Institute of Architects (AIA) is committed to protecting the health, safety, and welfare of the public. Since 1857, this concern is central to all that we, as architects, do. AIA writes today to share our feedback to Treasury's interim final rule regarding Coronavirus State and local fiscal recovery funds.

AIA commends the Treasury Department's specific request that comments focus on the needs of historically disadvantaged communities who experienced the greatest economic hardship and health disparities during the pandemic. AIA is committed to promoting equity in the built environment and, while all communities suffered during the COVID-19 pandemic, some communities continue to need additional support to economically recover.

AIA recommends that the U.S. Department of Treasury make funding eligible to better prepare low-income communities to shelter-in-place, when needed. The COVID-19 pandemic has clearly shown the need for families to withstand prolonged periods of time indoors safely and healthily.

Many Americans know that homes (and other personal space) had to be utilized to serve as venues for home life, work, childcare, and education. To withstand energy demands and ensure the health and safety of housing occupants, the Dept. of Treasury should extend funding eligibility to retrofit existing low-income housing for greater energy efficiency and resilience within existing Department of Housing and Urban Development (HUD) programs.

Additional eligibility should be provided for grid-integration efforts among affordable housing rentals and homes to promote energy resilience. Federal funding should also be prioritized for communities with the greatest need for financial assistance.

AIA also believes that funding eligibility should be provided to grants for supportive housing services and toxin reduction efforts within low-income housing communities. Supportive housing services provide onsite services that aid with a diverse range of disabilities, illnesses, and health issues. Additionally, supportive housing is often paired with social services, such as job and skills training, to further help communities rebound in the post-COVID-19 economy. Grant eligibility should also expand for efforts to eliminate toxins, like lead and asbestos, from housing.

AIA recommends providing eligible funding for existing Environmental Protection Agency (EPA) programs like the Technical Assistance Services for Communities (TASC) to help disadvantaged communities advance community environmental protections. As individuals and families spend more time at home, it is critical that these communities are afforded the opportunity to spend their lives in homes that are safe and toxin-free.

AIA also asks the Dept. of Treasury to consider eligibility for revitalization efforts among areas with blighted and abandoned properties. The COVID-19 pandemic has emptied many commercial offices spaces in urban and rural areas alike. Considering the scarcity of available affordable housing units for citizens in need, the U.S. should provide eligible financing to retrofit existing abandoned property to create additional affordable housing resources. Priority should be given for areas with the highest need of affordable housing and for areas near public transportation hubs.

Thank you for your careful review of AIA's comments on the Dept. of Treasury's interim final rule on "Coronavirus State and Local Fiscal Recovery Funds Interim Final Rule Comments." Please do not hesitate to contact me if you have any additional questions or would like information from AIA.

Sincerely,



Sarah Dodge
Senior Vice President of Advocacy and Relationships
The American Institute of Architects

CC: The Honorable Marcia Fudge
Secretary
U.S. Department of Housing and Urban Development

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency