

Presidential Transition Recommendations



Executive Summary

The Association of Alaska Housing Authorities (AAHA), founded in 1994, is a nonprofit 501(c)(3) organization that provides advocacy, research and analysis, and capacity building services to address Alaska’s unique housing challenges. Our members are the state’s 14 Regional Housing Authorities (RHAs), which serve as Tribally Designated Housing Entities (TDHEs) for 196 federally recognized tribes under the Native American Housing Assistance and Self-Determination Act (NAHASDA), and the Alaska Housing Finance Corporation. Our members’ work showcases Alaskan innovation and resilience despite a generation of underfunding and a 12-year lapse in NAHASDA authorization. ***TDHEs are vital to addressing Alaska’s housing affordability and supply crises, serving communities in rural villages, regional hubs, and urban centers.*** This transition report offers the Trump Administration actionable recommendations to help tackle Alaska’s housing needs.



AAHA’s top three recommendations for the Trump administration:

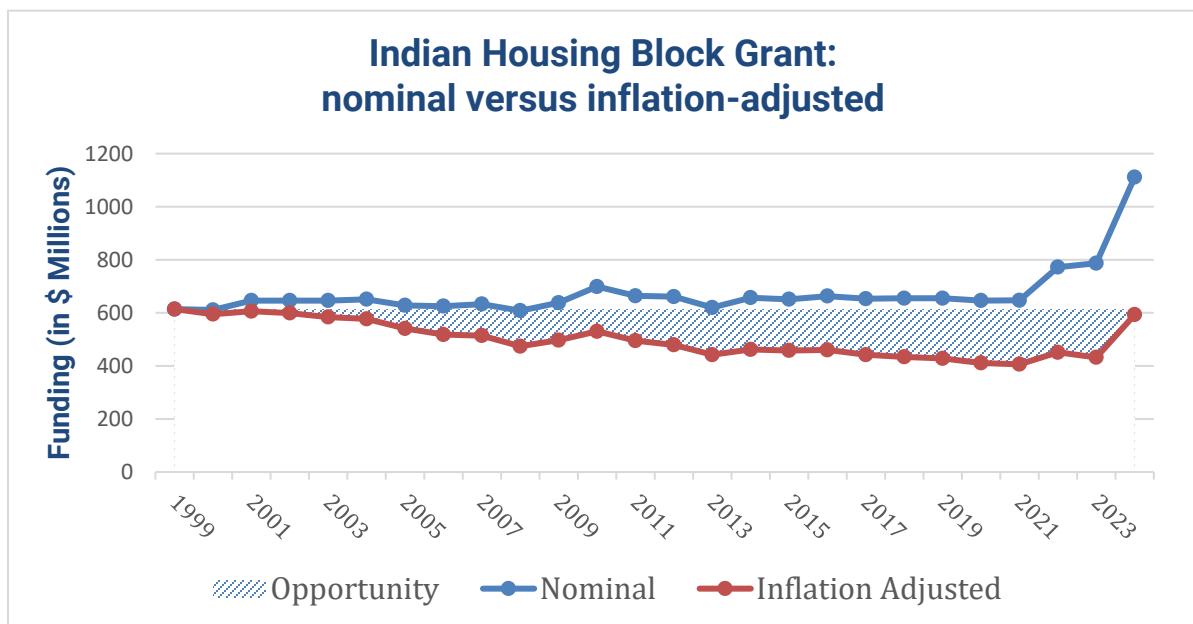
1. Safeguard Tribal purchasing power
2. Reverse the Biden-Harris unfunded BABA mandate
3. Sustain the HUD Tribal Intergovernmental Advisory Committee

Recommendations in Detail



Priority One: Safeguard Tribal Purchasing Power

- To maintain purchasing power for Tribes and TDHEs, the Indian Housing Block Grant (IHBG) needs to be funded at no less than the FY2024 appropriation level
- In Alaska, Regional Housing Authorities (RHAs) are the largest—and often the only—developers of affordable housing in their regions, utilizing the IHBG in a consortium model as TDHEs to deploy housing and leverage economies of scale
- Most funding for this work comes from the IHBG authorized under NAHASDA, which consolidated eight (8) HUD programs previously available to Tribes



While NAHASDA was a landmark reform that respected self-determination and reduced federal involvement by allowing Tribal communities to identify their own housing needs, one unfortunate outcome is that these needs became easier to silo and were left unaddressed for decades. In the past 20 years, HUD's overall budget exceeded inflation by 50%, while Tribal communities lost half their purchasing power. As the real dollar value of the IHBG has declined, it allowed inflation to sap the production volume of affordable housing. It was not until FY2024 that the IHBG was restored by Congress to inflation-adjusted FY2000 levels. The resulting generation of lost housing output—totaling billions over a period that HUD had an inflation-proofed budget—is unfair to Native communities.



The image above shows housing output in recent decades by the Bering Straits Regional Housing Authority in the village of Brevig Mission. The 20 homes in the two red circles were built shortly after NAHASDA's enactment in the late 1990s; the ten homes in the green circle were built in the 2000s, and the five homes in the black circle were completed in the 2010s.

This vividly illustrates the combined effects of inflation and flat IHBG funding on construction volume over the years. The story is the same across many Alaskan communities.

Priority Two: Reverse the Biden-Harris Unfunded BABA Mandate



- The Infrastructure Investment and Jobs Act of 2021 required BABA compliance for Tribes and TDHEs and was an unfunded mandate
- Tribes and TDHEs should be exempted from the Build America Buy America Act (BABA) in light of the nationwide housing crisis and the overwhelming unmet need for safe, sanitary, affordable housing in Tribal communities
- Tribes and TDHEs develop residential units for private use, which the Biden-Harris Administration incorrectly classified as ‘infrastructure’
- Relief measures for Tribal programs issued in January 2025, while welcome, leave a disproportionate burden on multifamily housing developers, which in turn depresses the total housing supply in Alaska

Increasing affordable housing is a public interest. Homelessness in America reached record-high numbers in 2024. A HUD report shows that in January of this year, the number of people experiencing homelessness shot up by 18 percent to roughly 770,000.¹ This is in addition to a 12% increase in 2023, marking a staggering rise of nearly a third over two years. Tribes and TDHEs, already unfairly beset by decades of underfunding, cannot be reasonably expected to comply with the unfunded mandate of BABA.

Rising housing costs, including the cost of materials, labor, and logistics, are deeply implicated in these figures. Trade measures such as BABA, meant to revitalize domestic supply chains, need to be thoughtfully crafted in order to deliver on their goals without crushing the ability of developers to produce affordable housing. This is especially true in Alaska, which routinely experiences material shortages and logistics challenges.

Consequently, AAHA and our members have been active from an early stage in petitioning the Biden-Harris Administration for a meaningful exemption from BABA implementation. In June 2024, our Senate delegation issued a letter to the Office of Management and Budget (OMB) calling for a five-year waiver from BABA for Tribal programs.² While we welcome the relief accorded for many of our members through an exemption announced in December 2024 for “private” single-family developments of 1-4 units, followed by an increase in the federal award threshold from \$250,000 to \$2.5 million and a two-year

¹ https://www.hud.gov/press/press_releases_media_advisories/HUD_No_24_327

² <https://www.indian.senate.gov/wp-content/uploads/BABA-Tribal-Waiver-Letter.pdf>

waiver from compliance with the “manufactured products” requirements announced in January 2025, we cannot forbear to comment that the magnitude of the housing crisis faced in Alaska and across the nation justifies a reversal of this well-intentioned but misapplied federal policy. We remain steadfast in our support for a full waiver—but no less than five years in any case—from BABA implementation for Tribes. We beseech the Trump Administration to reverse the unfunded Biden-Harris BABA mandate.

Priority Three: Sustain the HUD Tribal Intergovernmental Advisory Committee

- The Tribal Intergovernmental Advisory Committee (TIAC) includes 15 Tribal leaders who advise HUD on housing policy and other matters that impact Indian Country
- While it does not replace the process of Tribal consultation, the TIAC strengthens the nation-to-nation relationship between HUD and Tribal communities, coordinates policy across HUD programs, and elevates the housing priorities of American Indian and Alaska Native peoples
- The TIAC’s work to date has focused on streamlining program eligibility and reporting processes, consolidating environmental review procedures, finding sensible approaches to building codes for Tribal communities, coordinating logistics with the military, and other ways HUD can cut red tape around Tribal housing development.



Other Recommendations

- Streamline reporting within the IHBG Annual Performance Report format for all other HUD programs available to Tribes, such as Tribal Healthy Homes Grants.
- Conduct meaningful Tribal engagement, including regular consultation, and maintain an effective policy forum for Tribes through the HUD Tribal Intergovernmental Advisory Committee.
- Score applications for the IHBG Competitive Grant at respective regional HUD offices to deploy funding in a manner consistent with the intent of NAHASDA.
- Reduce development costs in Native communities by promoting cost-saving

partnerships with the military, such as Department of Defense Innovative Readiness Training³ to transport construction materials while providing valuable real-world training opportunities to the armed forces.

- Ensure that building codes and energy standards are implemented in a sensible, straightforward manner that minimizes compliance burden and accounts for regional differences.

By implementing our key priorities along with these additional recommendations, the administration can limit federal bureaucracy, enhance Tribal engagement and self-determination, and reduce development costs and promote economic growth while increasing the supply of safe, sanitary, affordable housing for Alaskans.

Economic Impact of Regional Housing Authorities in Alaska⁴



\$228 million in direct, indirect and induced impacts on state economy



11,600 Alaskans live in **5,000 units** built, improved or managed by RHAs



50 jobs created and **1,280 jobs** supported in Alaska by RHAs



\$53 million in direct payroll supporting **\$97 million** total payroll



83% of goods and services purchased from Alaska providers



³ <https://www.ang.af.mil/Media/Article-Display/Article/4014055/kentucky-air-guard-helps-alleviate-arctic-housing-shortage-with-airlift-mission/>

⁴ Data from 2021 AAHA Economic Impact Study

Acknowledgements

The report incorporates insights from subject matter experts, including AAHA members, affiliates, subcontractors and partner organizations. We also appreciate the work of Alaska's congressional delegation and staff to advance Alaska's housing priorities.



Alaska Housing Task Force

AAHA is committed to collaborating with the incoming HUD leadership to identify and secure the necessary resources to establish, convene, and facilitate an Alaska Housing Task Force, ensuring that the effort is fully supported and adequately funded.

Alaska faces obstacles to developing a sufficient supply of quality housing that have not been observed to a comparable degree in the contiguous United States. Factors that influence the total cost of development include the state's vast geography, formidable

Arctic and subarctic climate and weather, limited surface transportation infrastructure, the high cost of energy, a highly dispersed population, decades of inadequate and unchanging funding for Tribal housing programs, fluctuations in state appropriations for housing, burdensome local permitting and federal environmental review procedures, increasing property insurance costs, and an intricate ecosystem of service delivery influenced by unique legal authorities, such as the Alaska Native Claims Settlement Act.

The objectives and scope of activities of an Alaska-specific Housing Task Force would include, but are not limited to:

1. Convene stakeholders from across Alaska for a series of candid and productive discussion to identify key obstacles to the production of more affordable housing
2. Identify and validate innovative partnership models, emerging technologies, and tactics that can reduce the cost of housing for Alaskans;
3. Analyze funding levels and administration of HUD programs with respect to Alaska;
4. Document and substantiate the housing priorities of Alaska Native communities.
5. Produce and deliver a comprehensive report on findings.

The task force would be comprised of approximately 15 members from across the state, representing urban and rural communities, as well as public and Tribal housing practitioners, funding agencies, nonprofit service providers and for-profit housing developers. HUD representatives serving on the task force would consist of the Principal Deputy Assistant Secretary for Public and Indian Housing and the Administrator of the Alaska Office of Native American Programs (ONAP).