

[REDACTED]

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**From:** Travis Ismir <[REDACTED]>  
**Sent:** Wednesday, August 23, 2023 12:09 PM  
**To:** Wilbourne, Kim 6-9083; TaxCreditQuestions  
**Cc:** Thompson Gooding  
**Subject:** [External] 2024 Draft QAP Comment - R/ECAP  
**Attachments:** HUD Correspondence\_RECAP.pdf

Kim,

I wanted to comment on the following section in the draft 2024 QAP – **“5 points for not being located, in whole or in part, in a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as defined by the U.S. Department of Housing and Urban Development.”** Although HUD has previously maintained a GIS Map of census tracts that meet their definition of a R/ECAP, the data utilized is now more than a decade old. We reached out to a Social Science Analyst at HUD to inquire about updating the data. Our correspondence is attached and below.

**“Unfortunately, late releases of decennial Census products have slowed the downstream processes HUD uses to update publicly available datasets. Please know that HUD is working to update its geospatial open data services to align with the 2020 decennial geographic framework as quickly as possible and as resources are made available. The specific data service in question - Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) – was part of a larger suite of products associated with the Affirmatively Furthering Fair Housing (AFFH) rule which was discontinued in the summer of 2020.”**

HUD is acknowledging that the data currently published is outdated, the larger suite of products referenced which includes R/ECAPS is discontinued, and while they anticipate bringing it back online in the future, that is not in progress. We would urge you to remove this scoring section in the QAP, or at minimum, allow developers to utilize FFIEC data to plug into the HUD R/ECAP formula which is updated annually. The available data from the FFEIC (see <https://geomap.ffiec.gov/ffiecgeomap/>) can be used to achieve the same intent as the discontinued HUD R/ECAP data. The following paragraph is pulled from the HUD website (<https://hudgis-hud.opendata.arcgis.com/datasets/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/about>): “To assist communities in identifying racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.”

Thank you,

**Travis Ismir**  
Director of Development  
Park Terrace Development  
[www.parkterracecompanies.com](http://www.parkterracecompanies.com)  
[REDACTED]



## Travis Ismir

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**From:** Huggins, John C [REDACTED]  
**Sent:** Thursday, March 9, 2023 6:05 AM  
**To:** Travis Ismir  
**Cc:** HUD User Helpdesk  
**Subject:** RE: <External Message> Fwd: HUD R/ECAP Update

External [REDACTED] )

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Good morning Mr. Ismir,

Unfortunately, late releases of decennial Census products have slowed the downstream processes HUD uses to update publicly available datasets. Please know that HUD is working to update its geospatial open data services to align with the 2020 decennial geographic framework as quickly as possible and as resources are made available.

The specific data service in question - Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) was part of a larger suite of products associated with the Affirmatively Furthering Fair Housing (AFFH) rule which was discontinued in the summer of 2020. Earlier this year, [HUD announced intentions to reinstate a revised AFFH rule](#), and plans are underway to update associated data products pending codification of that statute.

Please feel free to reach out if you have any other questions, or feedback.

-John

**John C. Huggins**  
Social Science Analyst, [Enterprise GIS](#) Team Lead

Department of Housing and Urban Development  
Office of Policy Development and Research  
451 7th Street SW, Room 8126  
Washington, DC 20410



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**From:** HUD User Helpdesk [REDACTED]  
**Sent:** Thursday, March 02, 2023 2:18 PM

**To:** Huggins, John C [REDACTED]  
**Subject:** <External Message> Fwd: HUD R/ECAP Update

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Good afternoon, John,

The Help Desk received a follow up email from Travis Ismir regarding the R/ECAP. Mr. Ismir would like to know when the HUD R/ECAP map will be updated to reflect new census tract data and if it is possible to receive a letter from HUD confirming their property is not located in a R/ECAP.

Could you provide the Help Desk with any insight into how we should respond?

Thank you in advance for any assistance you may provide.

HUD User  
P.O. Box 23268  
Washington D.C. 20026-3268  
1-800-245-2691  
TDD: 1-800-927-7589  
Fax: 1-202-708-9981  
[helpdesk@huduser.gov](mailto:helpdesk@huduser.gov)

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----- Forwarded Message -----

**Subject:** RE: HUD R/ECAP Update  
**Date:** Wed, 1 Mar 2023 18:33:15 +0000  
**From:** Travis Ismir [REDACTED]  
**To:** HUD User Helpdesk [REDACTED]

Good afternoon,

I never heard back from a specialist. Can you please assist?

**Travis Ismir**  
Director of Development  
Park Terrace Development  
[www.parkterracecompanies.com](http://www.parkterracecompanies.com)  
[REDACTED]



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**From:** [HUD User Helpdesk](#)

**Sent:** Thursday, January 12, 2023 4:23 PM

**To:** [Travis Ismir](#)

**Subject:** Re: HUD R/ECAP Update

Good Afternoon,

Thank you for contacting the HUD User Clearinghouse.

HUD User is your go-to source for housing and community development researchers and policymakers. We have more than 900 publications and data sets, most available as free downloads on this site. Print-based copies are available for a nominal cost by visiting the HUD User Web Store at: <https://webstore.huduser.gov/catalog/index.php/>. To learn more about the HUD User website, please visit the first time visitor section at: <https://www.huduser.gov/portal/firsttimevisit.html>.

We have forwarded your question to a specialist for assistance. We apologize for any inconvenience this may cause.

If you require further assistance, please do not hesitate to contact us at:

HUD User

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Washington D.C. 20026-3268

1-800-245-2691

TDD: 1-800-927-7589

Fax: 1-202-708-9981

[helpdesk@huduser.gov](mailto:helpdesk@huduser.gov)

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On 1/11/2023 7:54 PM, Travis Ismir wrote:

Can you please provide an update? Thank you.

Travis Ismir

Director of Development

Park Terrace Development

[www.parkterracecompanies.com](http://www.parkterracecompanies.com)



From: [Travis Ismir](#)  
**Sent:** Tuesday, January 3, 2023 9:36 AM  
**To:** [HUD User Helpdesk](#)  
**Subject:** RE: HUD R/ECAP Update

Good morning,

I wanted to follow up on this.

Thank you,

Travis Ismir  
Director of Development  
Park Terrace Development



[www.parkterracecompanies.com](http://www.parkterracecompanies.com)



From: [HUD User Helpdesk](#)  
**Sent:** Wednesday, December 21, 2022 3:52 PM  
**To:** [Travis Ismir](#)  
**Subject:** Re: HUD R/ECAP Update

Good Afternoon,

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We have forwarded your question to a HUD specialist for assistance. We apologize for any inconvenience this may cause.

If you require further assistance, please do not hesitate to contact us at:

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On 12/20/2022 3:16 PM, Travis Ismir wrote:

Good afternoon,

Just following up on the below email.

Thanks

Travis Ismir  
Director of Development  
Park Terrace Development



[www.parkterracecompanies.com](http://www.parkterracecompanies.com)



From: [Travis Ismir](#)  
**Sent:** Thursday, December 15, 2022 3:57 PM  
**To:** [helpdesk@huduser.gov](mailto:helpdesk@huduser.gov)  
**Subject:** HUD R/ECAP Update

Good afternoon,

I work for an affordable housing developer. We are working on a project in \_\_\_\_\_, South Carolina. This project falls in Census Tract \_\_\_\_\_. We cannot develop land location in a R/ECAP. According to the HUD R/ECAP Map - <https://hudgis-hud.opendata.arcgis.com/datasets/racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps> - this census tract is being shown as a R/ECAP. I do notice the data appears to have been last updated in 2020. According to the calculation and according to the 2022 census tract data (see attached), the census tract should no longer qualify as a R/ECAP due to a large decrease in the % below the poverty line.

Do you know when the HUD R/ECAP map will be updated to reflect new census tract data? Is it possible to request a letter from HUD confirming our property is not located in a R/ECAP?

Thank you!

Travis Ismir

Director of Development

Park Terrace Development

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