



Mr. Clinton Jones  
General Counsel  
Attention: Comments/RIN2590-AB34  
Federal Housing Finance Agency  
400 7<sup>th</sup> Street SW  
Washington DC. 20219

October 28, 2024

Dear Mr. Jones,

The Community Home Lenders of America (CHLA) appreciates the opportunity to comment on the FHFA proposed 2025-2027 Housing Goals for Fannie Mae and Freddie Mac.

CHLA is a national non-profit association of small and mid-sized community-based mortgage lenders. The mission of the CHLA is to promote federal mortgage programs, rules, and regulations which treat community mortgage lenders fairly, and which reflect the critical importance that community mortgage lenders play in providing broad access to credit for borrowers, in increasing competition in mortgage markets, and in providing borrowers with quality mortgage services and access to loans at a local level.

CHLA supports the proposed 2025- 2027 Housing Goals and the mandate to Fannie Mae and Freddie Mac to meet reasonable single family and multifamily housing goals. The housing goals provide a critical framework for mortgage funding to low- and moderate-income borrowers and renters, and those in minority and underserved markets.

CHLA also appreciates the flexibility proposed through new Enforcement Factors that permit FHFA to make goal adjustments as needed to address unexpected market outcomes, thereby preventing unintended consequences that may include unwanted market behaviors that will not benefit the intended borrowers and renters.

The FHFA proposed 2025-2027 housing goals will provide liquidity to significant segments of lower and moderate-income homebuyers, renters and underserved populations across the nation. The proposal to include reasonable market estimate methods with flexibilities and a sensible framework for measurement will also serve to mitigate the risks of unintended consequences.

CHLA supports the proposed rule appreciates the opportunity to provide feedback.

Sincerely,

**Community Home Lenders of America**