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May 20, 2009

Alfred M. Pollard  
General Counsel  
Attention: Comments/RIN 2590-AA25  
Federal Housing Finance Agency  
1700 G Street, NW, Fourth Floor  
Washington, DC 20552  
RegComments@fhfa.gov

Dear Mr. Pollard:

On behalf of the National Affordable Housing Management Association (NAHMA), I am writing to highlight our concern over FHFA's proposal to rollback the Government Sponsored Entities' (GSE) Multifamily Special Affordable Goals. We feel the rollback will undermine economic recovery by worsening the lenders' liquidity crisis, which has already hindered their ability to finance additional affordable rental housing.

NAHMA is an organization committed to promoting development and preservation of quality affordable multifamily housing. Our mission is to advance legislative and regulatory policy and prepare affordable housing professionals to succeed in evolving economic and political environments. NAHMA's members are property owners and managers, industry stakeholders, and providers of goods and services to the affordable housing industry.

The multifamily market is not in turmoil. Current "market conditions", as cited by the FHFA in their proposal, are applicable to the sub-prime and other single-family mortgages whose purchase contributed to the down turn of Fannie Mae and Freddie Mac. In fact, the demand for multifamily affordable housing has skyrocketed due to increased single-family home foreclosures and job losses in this unpredictable economy.

NAHMA urges the FHFA to reconsider its proposal to rollback the GSEs' Multifamily Special Affordable Goals. Instead, the GSEs should be part of the solution to stabilizing communities by purchasing the performing, seasoned multifamily mortgages now held in portfolio by conventional lenders. With a new supply of capital, the lenders could finance thousands more affordable rental units, which would create jobs and house America's workforce. These lenders originated over \$50 billion of performing "community development loans" annually in 2005, 2006, and 2007. They have very successful records of accomplishment in raising private capital to finance affordable rental housing. The proposal to set Fannie Mae's and Freddie Mac's 2009 goal for purchasing affordable multifamily loans at only \$9 billion is a significant step backward.

Thank you for considering these comments. I look forward to working with FHFA to advance our shared goal of providing quality affordable housing to low-income families.

Sincerely,

Kristina Cook, CAE  
Executive Director