



April 25, 2018

Alfred M. Pollard, General Counsel  
Federal Housing Finance Agency, Eighth Floor  
400 Seventh Street SW  
Washington, DC 20219

Attention: Comments/RIN 2590-AA83

Dear Mr. Pollard:

CAMBA Housing Ventures respectfully requests a 30-day extension to the comment period for the Federal Home Loan Bank's Affordable Housing Program Notice of Proposed Rulemaking ("AHP Proposed Rule"). As Executive Vice President of CAMBA Housing Ventures (CHV) and as a member of the Affordable Housing Advisory Council of the Federal Home Loan Bank of New York, I have reviewed the AHP Proposed Rule and believe the current 60-day comment period is not long enough to allow all stakeholders enough time to respond. The changes proposed are substantial, and deserve adequate consideration.

CHV is an affiliate of CAMBA, Inc., one of New York's largest community-based social service organizations. CAMBA provides wraparound services that connect people with opportunities to enhance their quality of life and economic mobility. CHV develops sustainable and energy efficient buildings that provide supportive and affordable housing for low-income and formerly homeless families and individuals. CHV developments are coupled with CAMBA onsite social services to enable the long-term economic and social success of low-income individuals and families in New York City. Since 2005, CHV has developed 2,062 units of affordable housing resulting in over \$625 million in public/private investment. The Affordable Housing Program has been essential to our work by serving as a reliable, legitimate, and much-needed funding source. AHP has provided invaluable certainty to CHV's affordable housing projects when dealing with the inherent risks of putting a deal together, and we hope to work together to improve AHP.

Due to the importance of the program and the complexity of the issue, we request the appropriate amount of time to review and analyze the AHP Proposed Rule. We appreciate the time and effort it took to make these recommended changes and would like to reciprocate with a thoughtful response that fully incorporates our experience and anticipated future needs.

CHV plans to specifically examine the proposed 1) outcome structure, 2) 50 percent minimum occupancy for homeless and supportive housing, 3) re-ranking projects, and 4) additional sponsor capacity requirements. As an affordable housing provider in New York City, we are dedicated to ensuring the success of AHP and commit to dutifully review the AHP Proposed Rule and making comments. To do so, we respectfully request a 30-day extension.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "D. Rowe", with a long horizontal flourish extending to the right.

David A. Rowe  
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