



Richard S. Whiting, Executive Director

May 3, 2018

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA83
Federal Housing Finance Agency
400 Seventh Street, SW, Eighth Floor
Washington, D.C. 20219

**Re: Notice of Proposed Rulemaking and Request for Comments –
RIN 2590-AA83 – Affordable Housing Program Amendments**

Mr. Pollard,

Thanks for the extended opportunity to comment on the FHFA's proposed rule concerning the Affordable Housing Program ("AHP") of the Federal Home Loan Banks (FHL Banks). I am Executive Director of Auburn Housing Authority. Auburn Housing Authority is an organization in Auburn, Maine that has previously applied for participation in AHP through the Federal Home Loan Bank of Boston (FHL Bank Boston).

The State of Maine & New England have benefitted greatly from the availability of flexible AHP funds that have allowed many innovative, affordable housing projects that would not have been rehabilitated or built without AHP.

As an occasional applicant for FHL Bank Boston AHP projects, we are concerned that FHFA's outcome requirements would unduly infringe upon FHLB-B's local flexibility and scoring methodology. We are concerned that the proposed re-ranking process would harm the program by unfairly penalizing good projects and potentially reducing future competition from disillusioned applicants. Increasing thresholds for targeted populations may also impair the financial feasibility of projects which would harm AHP participation. The proposed rule also misses the opportunity to simplify AHP administration by minimizing redundancies and allowing better & simpler coordination with other funders. The "cure first" language is problematic and unnecessary; as long as modifications would not reduce the score of a project below threshold, such administrative overkill seems unnecessary. Finally, the new development team evaluation requirements potentially could unreasonably exclude (or potentially discriminate against) applicants with new or less tested members but possessing sufficient overall strength as a team to be successful.

We thank the Federal Housing Finance Agency for seeking to update the AHP regulation. However, in light of the many problems noted above, we respectfully request that you reconsider parts of the proposed amendments, especially the required outcomes framework. Thanks again for the opportunity to comment on this program, which is an essential component of affordable housing development in New England. If you have any questions, please feel free to contact me at 207.784.7351.

Sincerely,

Richard S. Whiting
Executive Director



