



# MAINE AFFORDABLE HOUSING COALITION

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Lewiston Housing Authority  
Machias Savings Bank  
Maine Association of Public Housing Directors  
Maine Bureau of Veterans' Services  
Maine Community Action Association  
Maine Department of Health & Human Services  
Maine Equal Justice Partners, Augusta  
Maine Real Estate Managers Association  
Maine Workforce Housing LLC, Portland  
Maso en Maso, Millisburg  
Maso Development LLC, Yarmouth  
Murray Plumb & Murray, Portland  
National Housing Conference, Washington, D.C.  
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Neighborhood Housing League, Lewiston  
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North Haven Sustainable Housing  
Northern NE Housing Investment Fund, Portland  
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Silver Street Development Corporation, Portland  
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The Eagle Point Companies, South Portland  
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Wright-Ogan Construction, Portland  
Yarmouth Senior Housing  
Year-Round Housing Corp., Long Island  
York County Community Action, Sanford  
York County Shelter Programs, Alfred  
York Housing  
Zachau Construction, Freeport

May 25, 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

Dear Mr. Pollard,

We appreciate the opportunity to comment on the Federal Housing Finance Agency's proposed rulemaking regarding the Affordable Housing Program ("AHP") administered by the Federal Home Loan Banks.

The Maine Affordable Housing Coalition (MAHC) is a diverse coalition of 136 private and public sector organizations, including developers, architects, engineers, builders, investors, Community Action agencies, public housing authorities, housing and service providers, advocates and others committed to ensuring that all Mainers are adequately and affordably housed. Many of our member organizations have played a significant role in developing, designing, building, and financing AHP projects throughout Maine.

In a fiscal environment as challenging as the one we are currently in, a strong and successful AHP program is absolutely critical to our work in creating the affordable homes that our communities need. We commend the Federal Housing Finance Agency for working to update the AHP regulation. However, we have real concerns about some elements of the proposed amendments, especially the required outcomes framework and the application re-ranking it necessitates.

It appears that the new outcomes concept being proposed requires the Banks to allocate 55% of their funding to two out of three regulatory priorities – and in so doing, overriding the discretion that the Banks have proven adept at utilizing in meeting their local area needs. We recommend that this approach not be adopted.

Of even greater concern, however, is the re-ranking of AHP applications that would be necessitated by the imposition of the proposed outcomes framework. AHP applicants in Maine value the transparency and predictability of the program, and make decisions about their potential developments and applications based on that transparency. As acknowledged by FHFA in the proposed rule, Banks would no longer be simply ranking applications according to their score but rather adding a second, outcomes-based, test that could result in the highest scoring projects being rejected and lower scoring projects being funded through a re-ranking process.

Such a change would likely add needless uncertainty and create frustration among the Bank's many AHP partners. The strongest applications should get funded, and weaker applications should not. Veering away from this approach is asking for trouble and weakening the transparency for which the program is currently celebrated.

Thank you for the opportunity to share our viewpoints on this very important program. If you have any questions, please feel free to contact me or our Director, Greg Payne, at [gpayne@mainehousingcoalition.org](mailto:gpayne@mainehousingcoalition.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Debora Keller". The signature is fluid and cursive, with a prominent initial "D".

Debora Keller  
Chair