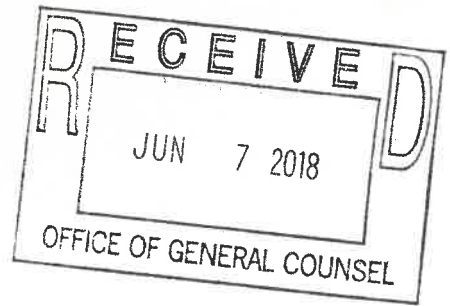




901 Pennsylvania NE Albuquerque, NM 87110

June 1, 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:

Thank you for the opportunity to comment on your recent release of proposed rulemaking regarding the Affordable Housing Program (“AHP”) of the Federal Home Loan Banks (FHLBanks). I am presently Vice President of Real Estate Development of YES Housing, Inc. (YES). YES is a 501c3 nonprofit affordable housing developer headquartered in Albuquerque, NM that partners with FHLBank Dallas to support affordable housing development throughout our region. YES has worked with FHLB-Dallas on 3 properties to-date throughout New Mexico (Albuquerque, Alamogordo and Los Alamos). This additional funding has been critical to allow the developments to move forward and create 150 units of affordable housing.

We are concerned with the outcomes framework as proposed in the AHP regulation amendments. We had hoped that the proposed amendments would provide FHLBanks with more flexibility in their scoring methodologies to allow AHP to adapt to the changing landscape of housing needs in local districts. However, the proposed amendments introduce an outcomes-based framework for awarding AHP funds which prioritizes the Federal Housing Finance Agency’s (FHFA’s) overall housing goals. The unintended consequence of this approach is that the proposed outcomes essentially eliminate FHLBank discretion in addressing local housing needs, establish preferences for certain project types and make AHP less transparent.

AHP is a critical source of funds for housing development and should be flexible enough to support the projects needed in local communities through a clear and understandable process. The outcomes framework as proposed in the amendments introduces a complex award structure that makes the AHP scoring process unclear and makes AHP a less-attractive funding resource. A scoring-based system is strongly preferred over an outcomes-based framework and will allow FHLBanks to sufficiently respond to local needs, encourage all project types to apply and maintain program transparency.

In addition, I have served for several years on the FHLB-Dallas Advisory Council. These proposed changes further restrict any flexibility that the Council has to respond to local needs and regional differences in our communities.

We commend FHFA for working to update the AHP regulation. However, in light of the concerns above, we respectfully ask that you reconsider parts of the proposed amendments, especially the required outcomes framework. Thank you for hearing our ideas on this very important subject. If you have any questions, please feel free to contact me at 432-530-7978 or mdenbleyker@yeshousing.org.

Sincerely,

Michelle DenBleyker
Vice President, Real Estate Development, YES Housing, Inc.