



HOUSING
DEVELOPMENT
consortium

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30 YEARS

June 11, 2018

Federal Housing Finance Agency
400 Seventh Street SW, Eighth floor
Washington, D.C. 20219

RE: Comment on proposed amendments to the Affordable Housing Program (AHP) Regulation, (RIN) 2590-AA83

Dear Mr. Pollard,

It is with concern that we write to you regarding proposed changes to Affordable Housing Program (AHP) requirements. As proposed, the amendments would create reduced flexibility, less transparency, and added administrative burden for housing providers.

The Housing Development Consortium of Seattle-King County (HDC) is a non-profit membership association for our regional affordable housing sector. Our 160 members include nonprofit housing developers, financial institutions, architects, service providers, and others dedicated to the vision of safe, healthy, and affordable homes in communities of opportunity for all. Beacon Development Group, a member, has cosigned this letter with us. Many more of our members have submitted their own comments.

We recognize that the intent behind the proposed amendments is to improve the AHP program through added flexibility and transparency, and we welcome the spirit of continuous improvement. However it is our belief that implementing the amendments will further complicate an already complex system of services. For housing providers, financing development and operations is akin to threading multiple moving needles; each funder operates with their own requirements and timelines. Our local financial institutions have been good partners in 'threading the needle,' by bringing an understanding of local housing needs and priorities to the table. As proposed, the amendments undermine this relationship by creating overly prescriptive required outcomes, motivating banks to supplant their own scoring methods with FHFA priorities or risk consequences.

The AHP has a stellar track record of success, and there are already controls in place to ensure continued success at every layer of the capital stack. New requirements will add costs, complexities, and delays to much needed affordable housing developments.

We urge you to maintain the current AHP scoring model and methodology, and continue to allow FHLBanks to exercise discretion in evaluating facts and circumstances that they are best suited to understand, given their work and relationships within the communities they serve.

Thank you for the opportunity to comment on the proposed amendments before you, and please consider us a resource should you have further questions.

Thank you,

Marty Kooistra
Executive Director
Housing Development Consortium

Cosigned: Beacon Development Group

**Housing Development Consortium
of Seattle-King County**

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