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June 8, 2018

Director Melvin L. Watt
Federal Housing Finance Agency
Constitution Center 400 7th Street, SW
Washington, D.C. 20024

Re: Affordable Housing Program Amendments Proposed Rule (RIN 2590-AA83)

Dear Director Watt:

My name is Cullen Ryan, and I serve as the Executive Director of Community Housing of Maine (CHOM). CHOM is a 501(c)(3) non-profit organization that provides advocacy, supportive housing, community inclusion, and stability for homeless and special needs populations across the state. Founded in 1993, CHOM has become the largest supportive housing developer in Maine, including the largest supportive housing provider for people experiencing homelessness, with some 78 housing sites in 31 communities spanning 10 counties, creating over 738 units of low-income and special needs housing. CHOM has developed an additional 10 projects consisting of 50 units for others. Our staff of 11 works collaboratively with more than 45 different service provider organizations to effectively and efficiently house well over 1000 of Maine's most vulnerable people. I serve as Chair of the Homeless Continuum of Care Board of Directors, Chair of the Maine Homeless Policy Committee, and acting Chair of the Statewide Homeless Council.

I offer the following comments regarding the Affordable Housing Program Amendments Proposed Rule:

- **Threshold for Targeted Populations:** The proposed rules increase the threshold for targeted populations, from 20% to 50%. This population nearly always requires rental subsidies in order to access and have success in housing. Rental subsidies are not readily available and often are frozen. A lack of rental subsidies means a lack of operating subsidies, and this is a serious concern which would challenge sponsors' ability to create long term, sustainable communities.
- **Sponsor Capacity Evaluation:** The proposed rule would require the evaluation of the project sponsor, including all affiliates and team members, such as general contractors. This is problematic on a number of levels, not the least of which is that often-certain team members, such as general contractors, are not identified at the time of application. Such team members are often selected after all funding sources are committed and the project is ready to move forward to loan closings and construction. It is also important to recognize that generally the AHP portion of affordable housing developments, while critical, are generally a relatively minor portion of the overall financing. Other sources of financing often bring rigorous procurement and bidding processes, making a parallel evaluation by AHP staff unnecessary and overly burdensome.
- **Supportive Services:** Rental projects with supportive services would need to submit a separate budget for services, apart from the housing budget. This requirement is particularly worrying, as it would present insurmountable challenges for some supportive housing developers, CHOM included. For very vulnerable populations, including people who have experienced long-term homelessness and people with mental health issues, housing is healthcare. As a developer, CHOM collaborates to produce and maintain community-based supportive housing that fosters pride, stability, and wellness. Two things make supportive housing work: Affordable stable housing, and adequate support. Even though CHOM provides stable, supportive housing to more than 1,000 of



Maine's most vulnerable people, it is not a support service provider, and it is the support that makes each person successful in their housing and in their life pursuits. CHOM ensures the provision of support services within its supportive housing developments through its well-established partnerships with more than 45 service provider agencies throughout Maine. Through these collaborations, CHOM ensures the people housed receive consistent, supportive services to engineer success in housing, but realizes that its expertise lies in developing, owning, and maintaining the properties; service provision is best left to the support service experts. As such, the requirement to include support service budgets would be very cumbersome and a clear barrier for CHOM's participation in the Affordable Housing Program, from which it, and hundreds of Maine's most vulnerable people, have benefited over the years.

Thank you for the opportunity to comment.

A handwritten signature in blue ink, appearing to read "Cullen Ryan", with a stylized flourish at the end.

Cullen Ryan
Executive Director