

South Plains Association of Governments

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June 12, 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 recently released proposed rulemaking impacting the Federal Home Loan Banks' (FHLBanks) Affordable Housing Program (AHP).

Since 1989, the AHP has been one of the largest sources of private funds in the nation supporting affordable housing. In the 28 years since its inception, the AHP has contributed over \$5.4 billion in private funds through a competitive grant program in support of affordable homeownership and rental housing.

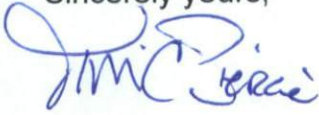
Since 1932, FHLBank Dallas has operated in the states of Arkansas, Louisiana, Mississippi, New Mexico and Texas. As a Council Of Governments (COG) whose membership is comprised of 15 counties and over 40 communities located on the Texas South Plains, we've had the opportunity to see the positive impact the AHP has made on residents in our region and state. For example, over the last 5 years the Federal Home Loan Bank of Dallas has provided residents of Texas \$14,531,479 in grant funds. These AHP funds have supported both new and rehabilitated housing in Texas.

As drafted, the Federal Housing Finance Agency's (FHFA's) proposed rule would limit FHLBank discretion to utilize the AHP to address local housing needs. Instead, the AHP should remain flexible enough for individual FHLBanks and affordable housing practitioners to support the unique needs of local communities.

As an alternative to the proposed rule's outcomes-based framework, a scoring-based system focused on the merits of each grant application would allow the FHLBanks to better respond to local needs, encourage all project types to apply for funds, and maintain program transparency.

We commend FHFA for working to update the Federal Home Loan Banks' Affordable Housing Program regulation. However, we respectfully request that you reconsider the proposed rule's outcomes-based framework and replace it with a scoring-based system that focuses on the unique needs of local communities. Thank you for the opportunity to provide input on this important issue.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Tim C. Pierce". The signature is stylized with a large initial "T" and "P".

Tim C. Pierce
Executive Director