

**From:** Robert E. Rutkowski <r\_e\_rutkowski@att.net>  
**Sent:** Wednesday, October 19, 2022 1:12 PM  
**To:** #FHFA REG-COMMENTS  
**Cc:** Keith Abouchar  
**Subject:** [EXT] Community comments: RIN 2590-AB21 2023-2024 Multifamily Enterprise Housing Goals

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Clinton Jones, General Counsel  
Attention: Comments/RIN 2590-AB21  
Federal Housing Finance Agency  
400 Seventh Street, SW.,  
Washington, DC 20219  
Via Email: RegComments@fhfa.gov

Re: Community comments: RIN 2590-AB21 2023-2024 Multifamily Enterprise Housing Goals

Dear General Counsel Jones,

AFREF and 34 allies sent a letter regarding the Safety and Soundness Act, which requires FHFA to establish annual housing goals for mortgages purchased by Fannie Mae and Freddie Mac (the Enterprises).

This letter supports the proposal's move towards a methodology that focuses on the percentage, not number, of affordable housing units financed by the Government Sponsored Enterprises (GSEs). However, the proposal fails to hold the GSEs to adequate lending standards and refine what counts as affordable housing units.

This letter seeks policy reforms that will prevent GSEs from financing loans that contribute to displacement and substandard living conditions for low income tenants and tenants of color. It also objects to FHFA goals being set at levels that are below recent performance by the Enterprises.

Full letter:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fourfinancialsecurity.org%2Fwp-content%2Fuploads%2F2022%2F10%2F10.17.22-housing-CRC-FHFA-Comment-Letter-on-MF-Affordable-Housing-Goals.pdf&data=05%7C01%7CRegComments%40fhfa.gov%7C9d183fbfe381417072cf08dab1f54052%7C0aebef204ba040eb93d637c168a45667%7C0%7C0%7C638017964174561135%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&data=%2FShICzOXPtgc448j6fzYWtTAuQ0dXU2S50a9%2FRtLdc%3D&reserved=0>

Take time to review these comments and give them the weight they deserve.

Yours sincerely,

Robert E. Rutkowski

cc:

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