### **Fxhibit F:**

# **Annual Investments Narrative Reporting Template**

#### FREDDIE MAC

## **RURAL HOUSING**

2018 REPORT

**EVALUATION AREA: INVESTMENT** 

## **ACTIVITY:**

Activity 6 - LIHTC Investment in All Rural Areas: Additional Activity

### **OBJECTIVE:**

Objective A -- Engage in LIHTC equity investment in all rural areas

### SUMMARY OF RESULTS:

	Investmen	Investments		Properties
Baseline	N/A			N/A
2018 Target	6	6		N/A
YTD 2018 Volume	10	10		17
Incomes Targeted	VLI units	LI units	MI units	
	40	791	791	

With our 10 investments supporting 17 DTS rural properties in 2018, we dramatically exceeded our target of 6 LIHTC equity investments in DTS rural areas while building our LIHTC Equity offering.

We received FHFA approval to reenter the LIHTC equity market in December 2017, and as a result, we started 2018 with no internal infrastructure, no syndicators, no pipeline of deals, no credit parameters, and only a skeleton crew team. In the same year, we built our business, used the entirety of our \$500 million cap granted by FHFA, and devoted a significant portion of the cap to underserved and DTS markets—an unprecedented achievement. In rural regions, we invested \$73 million across 17 properties, supporting 791 incomequalifying units.

We did this through a proprietary fund model. This is an especially challenging and high impact model that requires deep knowledge of and involvement in these markets, enables us to better understand and respond to the needs of the market, and creates necessary competition for multi-investor funds that typically seek to maximize yields for economic investors.

Because of deliberate efforts and strategic planning from the onset of our program, we exceeded our targets. We identified syndicators in part based on their ability to run a proprietary fund and invest in rural markets – five of our six syndicators completed rural investments in 2018 and two closed high needs rural regions investments for us.

When viewed in the context of the national market, our work in rural areas is especially remarkable. Per our analysis of National Housing Preservation Database (NHPD) data, over the past twenty years, there has been a national average of 1,350 LIHTC properties placed in service each year. Rural regions are only 27.6% of that.

In our first year of business, we made 10 investments (across 17 properties), including 4 in Middle Appalachia and 1 in a Persistent Poverty County (PPC), and a 14 property USDA 515 preservation portfolio (including 8 DTS rural properties). These numbers should be viewed in the context of the \$500 million cap. The cap requires us to strategically allocate our investments to support not just DTS, but also other FHFA-identified underserved markets (for example, low investment transactions in to p 10 CRA markets) and run a

geographically diverse business (including markets that are not underserved) in order to effectively manage risk. Our 17 properties in DTS rural regions, out of 45 properties overall, represents a greater share relative to the national market: 38% (17/45) of our investments were in DTS rural regions while 27.6% of the annual average number of properties placed in service are in DTS rural regions.

In the context of both the small size of this market and the overall limitation of our investment authority, we had a highly substantial impact on this market.

Select the category that best describes your progress on this objective for the year.
☐ Objective met
☐ Objective exceeded
$\square$ Objective partially completed:
☐ 75-99% (substantial a mount)
☐ 50-74% (limited a mount)
☐ 25-49% (mi nimal a mount)
☐ 1-24% (less than a minimal amount)
☐ No milestones a chieved
IMPACT:
Provide a self-assessment of the level of impact that actions under the objective have accomplished.
□ 50 – Substantial Impact
□ 40
☐ 30 – Meaningful Impact
□ 20
☐ 10 – Minimal Impact
□ 0 – No Impact

## IMPACT EXPLANATION:

Answer the following questions.

**SELF-ASSESSMENT RATING OF PROGRESS:** 

1. How and to what extent were actions under this objective impactful in addressing underserved market needs or laying the foundation for future impact in addressing underserved market needs? (Character limit: 3,000 characters, including spaces)

There are three definable categories of direct and substantial impact from our transactions this year: (A) Our proprietary fund model drives deeper focus on these markets and creates competition for multi-investor funds; (B) the greater share of our investments made in these areas relative to the national share of allocations to these markets; and (C) the community impact of the specific investments made.

- A. Our proprietary fund model is uniquely impactful to the market beyond the Freddie Mac investment dollars placed. For syndicators to identify transactions, they must develop new relationships in these markets and then leverage these to pursue transactions for other investors. As a direct result of our involvement, several syndicators are now engaging in rural markets. This increases competition in, and attention for, these hardest to serve communities and can positively impact LIHTC equity pricing, which further stretches public subsidy. Our model also creates competition for multi-investor funds, which are typically more yield driven and may be able to pass less per credit for investments due to limited competition.
- B. We closed a materially greater share of our investments in properties in DTS rural markets compared to the share of allocations made to these markets on an annual basis. Per our analysis of NHPD data over the past 20 years, there has been a national average of 1,350 LIHTC properties placed in service each year. Rural properties comprise 27.6% of that. Our 17 properties in DTS

rural regions, out of 45 properties overall, represent 38% (17/45) of our business—far more than the rural share of properties placed in service overall.

C. The two examples below highlight the positive impacts these investments made in the market.

Property	Related Texas USDA 515 Portfolio	Wintergreen Apartments
Region	Rural	Rural
Units	556 Units at 30%, 50%, and 60% AMI	40 units affordable at 30%, 40% and 50% of AMI
Details	The Related Texas Portfolio is an acquisition and rehabilitation of a USDA 515 portfolio consisting of 14 family properties (556 units) in Texas. 8 of these are DTS rural. 15 (3% of total) units will be restricted to 30% of AMI, 45 (8%) units will be restricted to 50% AMI, 492 (88%) units will be restricted to 60% AMI, and 4 (1%) will be non-revenue generating management units.  The properties were originally built between 1974 and 1985 and needed significant rehab, however with an average equity per property of \$1.46 million, investing in these properties on an individual basis would not have been economically feasible. Our substantial equity in the pooled transaction mitigated that challenge and enabled a rehab of approximately \$36,639 per unit and made this transaction possible.	Wintergreen Apartments is a new construction of 40 apartments in Keystone, Colorado, 80 miles west of Denver. The project will include a mix of one-, two-, and three-bedroom units that are restricted to 30%, 50% and 60% AMI.  Our LIHTC equity supports these units. Our forward commitment loan offerings support these units, as well as an additional 120 workforce housing units targeting households up to 100% AMI and 36 seasonal employee units. The actual contract rents at the property offer a discount to market ranging from 39% to 73%. Our equity is 62% of total development costs, with Freddie Mac providing forward commitments on both phases. Without our substantial equity and forward commitments, this property could not have been built.

2. Optional: How do actions under this objective support future actions detailed in the Plan for the underserved market? If there have been any changes in the planned next steps or timeline for work under or related to this objective, describe the changes and provide a brief explanation. (Character limit: 1,500 characters, including spaces)

Our investments in rural regions prompted our syndicator network to establish new relationships, and deepen existing ones, to support our proprietary fund model. We anticipate that these joint efforts will better enable us to achieve our future investment targets. In addition, we consulted our syndicators in our 2018 Spotlight on Underserved Markets white papers that focused on LIHTC in high needs rural regions and populations. We will continue to leverage their expertise (and develop our own) through each transaction we do, as well as for our 2019 DTS papers on the Lower Mississippi Delta and PPC markets.

3. <u>Optional</u>: Are there any market factors that adversely impacted the actions under this objective? If so, describe. *(Character limit: 3,000 characters, including spaces)* 

There are three predominant factors that, when combined, adversely affect our ability to support this market at a significant scale: (A) the absolute size of the market, (B) sponsor and credit concerns with a subset of potential investments, and (C) the \$500 million cap on our LIHTC equity investment authority.

- A. Per our analysis of NHPD data, an average of 370 LIHTC properties are placed in service each year in rural regions. This is an absolute limit on the number of investments we could make if we were the only investor in the market. Instead, we are one of several investors local banks and multi-investor funds. While we can provide stability to the market and compete on deals for the benefit of the market, it is not our aim to crowd out private capital investment or to act without discipline in order to achieve numerical targets.
- B. Not every property placed in service would necessarily be a strong investment opportunity with an appropriate credit risk profile.

  Rural markets tend to have a different population of sponsors/property owners from the national market. In general, these sponsors are more locally oriented, have less net worth and liquidity, and less experience operating properties than national sponsors. This creates risk, so we must look at sponsor experience closely as part of our credit decisions.
- C. The \$500 million cap requires us to be strategic in the investments we make. We intend to run our \$500 million LIHTC business with a strong mission focus and a diversified portfolio that enables us to manage risk and provide marketplace liquidity and stab ility for

the long term. Our priority is to emphasize transactions that serve underserved markets, both nationally and inrural areas. However, serving underserved markets well and with long term, sustainable liquidity necessitates having a geographically balanced portfolio. Given that there is a cap on the amount of investment we can make, a DTS qualifying investment must be balanced against other investments.

4. <u>Optional</u>: How did the actions under this objective contribute to increased or future loan purchases for the unders erved market? *(Character limit: 1,500 characters, including spaces)* 

Our activities in 2018, which included both establishing our business and placing investments in high impact properties, I aid a strong foundation for future investments consistent with our DTS plan. We cultivated relationships with syndicators and developers who are active in these markets, deepened our own knowledge of the markets from underwriting transactions and visiting communities, and prompted our syndicators to deepen their presence in these markets. These successes will enable us to grow our support responsibly over time through higher annual targets. However, it is necessary to be mindful that the overall market size in high needs areas is limited by market factors ranging from local economic challenges to the simple limit on the number of LIHTC allocations in these markets on an annual basis. Further, we must run a business that is geographically diverse and promotes long term stability and safety and soundness. We will look to find the optimal level of support for this market as we continue our business, and we will do so while being careful not to cause market disruption.

Attach the data specified for Investments objectives in Section 3 of this document.

# **EVALUATION AREA: INVESTMENT**

ACTIVITY:		
Activity 6 – LIHTC Investment in A	All Rural Areas: Additional Activity	
OBJECTIVE:		
Objective A Engage in LIHTC eq	uity investment in all rural areas	
SUMMARY OF RESULTS:		
	Investments	
Baseline	N/A	
2018 Target	6 Rural	
1Q 2018 Volume	-	
market-leading research to bette All of these actions are consistent engaging in investments. We are opportunities for Duty to Serve. A	r understand market needs. t with our plan to build a strong an developing these necessary partne As a result, we are on track to achie	ocated in such tracts. Simultaneously, we have been conducting  I sustainable infrastructure with multiple syndicators prior to rships, and have begun to see a wide range of investment we this objective by year end.
SELF-ASSESSMENT RATING		the and other action
Select the category that best desc	cribes progress on this objective for	the reporting period.
<del>-</del>	partial completion of the object	ive expected
☐ Unlikely to achieve any n		
ADDITIONAL INFORMATION	N (IF APPLICABLE):	

### Exhibit B:

## **Second Quarter Investments Narrative Reporting Template**

#### FREDDIE MAC

### **RURAL HOUSING**

10 REPORT

**EVALUATION AREA: INVESTMENT** 

## **ACTIVITY:**

Activity 6 – LIHTC Investment in All Rural Areas: Additional Activity

## **OBJECTIVE:**

Objective A -- Engage in LIHTC equity investment in all rural areas

## **SUMMARY OF RESULTS:**

	Investments
Baseline	N/A
2018 Target	6 Rural
YTD 2018 Volume	-

LIHTC equity investment is often the most effective way to support affordable housing in rural markets. Since the implementation of our DTS Plan, we have developed product guidelines and built an internal team responsible for LIHTC Equity Investment. We have specifically identified several experienced LIHTC syndicators that have a history of working with established developers. We are actively negotiating all Partnership Agreements, all of which we expect to execute in the 3<sup>rd</sup> quarter. We have also developed a mapping tool to be used by our approved syndicators to help them identify high-needs rural census tracts and determine if the properties they are targeting are located in such tracts. Simultaneously, we have been conducting market-leading research to better understand market needs.

All of these actions are consistent with our plan to build a strong and sustainable infrastructure with multiple syndicators prior to engaging in investments. We are developing these necessary partnerships, and have begun to see a wide range of investment opportunities for Duty to Serve. We continue to monitor prospective LIHTC deals that feature strong sponsors, market returns, and have a focus on underserved markets. We currently have qualifying transactions that are on track to close in the third quarter. As a result, we anticipate achieving this objective by year end.

## SELF-ASSESSMENT RATING OF PROGRESS:

Select the category that best describes progress on this objective for the reporting period.

☑ On-target to meet or exceed the objective

☐ Progress delayed and/or partial completion of the objective expected		
☐ Unlikely to achieve any milestones of the objective		
ADDITIONAL INFORMATION (IF APPLICABLE):		
ADDITIONAL INFORMATION (IF APPLICABLE).		
N/A		

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