



September 25, 2013

Federal Housing Finance Agency
Multifamily Housing Policy
400 7th Street, S.W., Room 9-261
Washington, DC 20024

RE: August 9, 2013 Notice For Public Input on 2014 Multifamily Scorecard

To Whom It May Concern:

On behalf of the investors, employees and most importantly, the residents in our apartment communities, Highridge Costa Investors, LLC welcomes the opportunity to provide comments on the Federal Housing Finance Agency's (FHFA's) proposed strategies to further contract Fannie Mae and Freddie Mac's multifamily mortgage activities.

Highridge Costa Investors, LLC is a company that specializes in the development, financing construction and asset management of affordable and mixed-income housing for families and seniors throughout the U.S., utilizing low-income housing tax credits, as well as other types of public and private financing. We currently own and operate 276 affordable communities (over 26,000 units) located in 33 states and Puerto Rico.

We find it difficult to comment on FHFA's options to implement program changes to shrink Fannie Mae and Freddie Mac's capacity because we view the proposed action as wholly unnecessary. While the perception might be that Fannie Mae and Freddie Mac play an "outsized" role in multifamily mortgage markets, the facts tell a wholly different story.

The enterprises' market share continues to decline and has actually fallen more than the 10 percent FHFA mandated at the start of the year. Indeed, the Mortgage Bankers Association estimates the multifamily origination market in 2012 was approximately \$143 billion, with Fannie Mae and Freddie Mac financing 44 percent of that total. If estimates for a 30 percent or larger increase in multifamily lending in 2013 are accurate, Fannie Mae's and Freddie Mac's market share likely will decline to the 30 percent level or below. This drop reflects the fact that private capital sources have been, and will continue to be, the primary source of mortgage debt for the apartment industry.

On a macro level, our firm's market experience leads us to conclude that artificially limiting the debt provided by the Fannie Mae and Freddie Mac's multifamily programs will harm owners and investors in apartment real estate by limiting options and creating voids in select markets. Private commercial real estate debt can be limited or, in some cases, unavailable in local markets, making critical a national debt source that features a full range of mortgage options.

Furthermore, it is vital to note that Fannie Mae and Freddie Mac support and complement all sources of multifamily debt, and do not exist solely as capital sources in the market. Because they provide the widest range of multifamily mortgage products in today's market, they have broad influence on other debt providers and lead the industry in standard setting. As such, without the Enterprises, the market will lose the competition and innovation that has benefitted borrowers and renters alike.

Additionally of concern, multifamily credit markets do not have a one-for-one replacement dynamic among participants, which in turn creates meaningful instability in our market if any one participant arbitrarily withdraws. All other sources of multifamily mortgage debt have constraints on their mortgage products, but also have their own beneficial access to capital. Banks have access to depository capital, insured deposits and can borrow from the Federal Reserve at a discount. Insurance companies and pension funds have no requirements or mandates to meet public purpose goals, allowing them to place capital in only the most desirable and beneficial markets, and with the most experienced and credit worthy owners. Accordingly, if implemented, FHFA's proposed actions would negatively impact access to capital and increase borrowing costs market wide to the detriment of borrowers and renters.

As a developer/owner and operator of affordable housing for the past 20 years, we have relied on financing programs provided by FNMA and Freddie Mac. Without their programs, affordable housing which has already taken a huge step back due to gap subsidy cutbacks at the federal and state levels, will become impossible to produce.

Fannie Mae's and Freddie Mac's multifamily lending programs are a model for prudent apartment real estate lending. Their programs have a long history of strong credit performance and have recently adapted to both backstop the markets effectively and shift their programs from balance sheet investment lending to securitized lending. We implore FHFA to avoid implementing further reductions or placing caps on Fannie Mae and Freddie Mac's origination levels and securitization activities with regard to multifamily finance.

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We appreciate the opportunity to share our views and welcome your questions, should you have them.

Sincerely,

A handwritten signature in blue ink, appearing to read "M.A. Costa", with a horizontal line extending to the right.

Michael A. Costa
President and CEO

MAC/mel

cc: The Honorable Senator Diane Feinstein
The Honorable Senator Barbara Boxer
Representative Janice Hahn
NMHC c/o David Cardwell