



norton county community

foundation

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November 25, 2014

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA39
Federal Housing Finance Agency
400 Seventh Street SW
Washington, D.C. 20024

Re: Notice of Proposed Rulemaking and Request for Comments – Members of FHLBanks (RIN 2590-AA39)

Dear Mr. Pollard:

Norton County Community Foundation has used the Joint Opportunities for Building Success (JOBS) program through FHLBank in Topeka for two projects and our community has benefitted tremendously. We rehabilitated two vacant, unusable historic properties in our downtown business district, restoring them for much needed turn-key commercial space. One property is now home to a service based business providing 4 full-time and 3 part-time jobs. The other renovated property contains the offices for Norton City/County Economic Development and the Norton Area Chamber of Commerce/Travel & Tourism, providing 3 full-time jobs. In a community the size of Norton 10 jobs is very meaningful.

FHLBank is a valuable community development partner, especially to small, rural communities such as Norton. Given the high cost of construction, we feel our available funding is best utilized by working with our existing properties and the funding provided through the JOBS programs helped us complete our projects.

We view FHLBank Topeka as a valuable resource in our efforts to grow our community and our local economy. FHLBank Topeka contributes almost \$1 million to the JOBS program each year and we are disappointed that the Federal Housing Finance Agency is proposing changes that will jeopardize FHLBank Topeka's ability to contribute to the JOBS program and others like it. The Northwest Kansas region is comprised of communities like ours and we are dependent on these types of funding programs. We face many economic challenges as it is and this proposed rule change will only intensify our situation.

Programs like FHLBank Topeka's JOBS program are critical in the survival and growth of small, rural communities and we encourage the Federal Housing Finance Agency to consider the individuals, families and communities that will be negatively impacted by your proposed changes. We respectfully request that the Federal Housing Finance Agency withdraw the proposed rule.

Thank you for your time and consideration.

Sincerely,



Tara Vance, Executive Director