

The Century Building  
130 7th Street, Suite 300  
Pittsburgh, Pennsylvania 15222  
Phone 412 688-7200  
Fax 412 688-0588  
www.trekdevelopment.com



December 15, 2014

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

Re: Notice of Proposed Rulemaking and Request for Comments --  
Members of Federal Home Loan Banks (RIN 2590-AA39)

Mr. Pollard:

TREK Development Group is an affordable housing partner that works closely with community lenders and FHLBank Pittsburgh. We know the crucial role FHLBanks serve in providing funding for community banks. This proposed rule would alter the relationship between FHLBanks and their member banks and potentially harm the affordable housing industry.

The FHLB has provided funding to several affordable and mixed income projects we developed over the past 20 years. In particular the Century Building, which is the first affordable (mixed income) property in downtown Pittsburgh, and HEARTH in Shaler Township, which serves homeless women with children. FHLB funding serves as a critical gap funding component. Without FHLB, many projects are financially infeasible. The AHP program rounds are very competitive and it is extremely difficult to win an award of this valuable resource. Any action that reduces the availability of this valuable resource will make it that much more difficult placing many important and worthy projects in financial jeopardy.

This rule will make membership in the FHLBank less attractive to banks and credit unions since continued access to FHLBank funding will be contingent on new ongoing asset tests. This will no doubt result in decreased lending by the FHLBanks which will hurt earnings. Ten percent of the net earnings of each FHLBank are directed to fund its Affordable Housing Program (AHP). Since 1990, FHLBank Pittsburgh has provided approximately \$183 million in AHP grant awards to create more than 28,000 units of housing for low or very low-income residents. Should current and prospective membership in an FHLBank be threatened, FHLBank Pittsburgh's ability to provide AHP grants to affordable housing partners will be diminished. Fewer funds will thus be available to provide AHP grants to support very-low and low-income housing. There exists a stable partnership between banks, affordable housing groups and FHLBanks through the AHP program that keeps at-risk families, veterans, senior citizens and people with disabilities from falling through the cracks.

The neighborhoods we serve require access to credit to build new housing, rehab existing stock and stimulate community investment. An arbitrary asset test for continued FHLBank membership will achieve the opposite effect and hurt communities in the process. As a stakeholder in this process, TREK Development Group strongly urges the FHFA to withdraw RIN 2590-AA39.

Sincerely,



John M. Ginocchi  
Vice President of Development  
TREK Development Group