



Ventura County Rescue Mission 234 E. 6th St., Oxnard, CA 93030 Lighthouse for Women & Children 150 N. Hayes Ave., Oxnard, CA 93030 Valley Food Bank 12701 Van Nuys Blvd., Suite A, Pacoima, CA 91331

San Fernando Valley Rescue Mission 13422 Saticoy St., North Hollywood, CA 91605 Central Coast Rescue Mission 1207 N. McClelland St., Santa Maria, CA 93454 Victor Valley Rescue Mission

16857 C St., Victorville, CA 92395

December 12, 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)

Dear Mr. Pollard:

Rescue Mission Alliance is a non-profit affordable housing provider operating throughout Los Angeles, Ventura, Santa Barbara and San Bernardino counties in California. We serve over 1,000 homeless persons each year; some are special needs. We have been involved with the Affordable Housing Program ("AHP") for the past 3 years and its impact on affordable housing has been significant. Without the availability of funding from the AHP program many projects would never have been developed and rent affordability levels would never have been achieved.

The proposed change to the membership requirements for the Federal Home Loan Bank ("FHLB") will impose burdens on current FHLB member banks will lead to a reduction in the number of FHLB members throughout the country. The proposed changes will disproportionately impact small- and medium-sized financial institutions which are critical partners in redeveloping underserved rural areas of the country by providing long term permanent debt and sponsoring Affordable Housing Program ("AHP") grants. Small and medium sized financial institutions operating in rural areas are many times the only banks that will sponsor an AHP grant for a small project due to location and/or the size of the permanent debt that a project can support. Many small to medium sized financial institutions that have stepped up to sponsor projects that serve low income seniors, families, and especially persons with special needs. If changes proposed by FHFA result in the loss of these members, these populations will no longer be adequately served in the rural areas.

The member institutions of the Federal Home Loan Bank have contributed to restoring economic vitality to our communities, creating jobs, and providing credit facilities that otherwise may not have been available. We are concerned that the proposed changes to the FHLB membership requirements will undermine the economic recovery in our community and throughout our state and reverse the progress we are making to revitalize our communities and provide safe, decent, and affordable housing. On the behalf of the communities/clients we serve, I urge you to withdraw RIN 2590-AA39 from consideration.

Sincerely,

Gary W. Gray President/CEO

