

ENGAGING LEADERS IN AN URBAN WORLD
TRANSFORMATIONAL HOUSING
STUDENTS ENGAGING THE CITY
TRANSFORMATIONAL LEGAL ADVOCACY

DEC 2 9 2014

OFFICE OF GENERAL COUNSEL

December 17, 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:

Mile High Ministries has been a beneficiary of the FHLBank Topeka's Affordable Housing Program (AHP) to serve the affordable housing needs of our Joshua Station community. Joshua Station Transformational Housing Program provides holistic, wrap-around services for homeless families who desire to move toward healthy, stable living.

The private, nonprofit, government and faith communities must join hands to be successful at overcoming poverty in our nation. We view FHLBank Topeka as a valuable affordable housing partner as together, we collaborate to make stronger families, communities, and cities.

We are deeply troubled that the Federal Housing Finance Agency's (FHFA) recently proposed rule impacting FHLBank membership could diminish the funding available through FHLBank Topeka AHP.

The proposed rule would require members of FHLBank Topeka to meet additional, unnecessary criteria to maintain membership in the FHLBank cooperative. Over 100 of FHLBank Topeka's 791 member institutions could lose their membership in the FHLBank under the proposed rule. Fewer banks, thrifts, credit unions and insurance companies borrowing from FHLBank Topeka would result in a decrease in FHLBank lending volume. It follows logically that this would lead to a reduction in FHLBank profitability and negatively impact available AHP funding.

With funding sources for affordable housing in America shrinking, we urge you to protect this highly successful grant program which, for the past 25 years, has been tremendously successful by nearly every measure. We respectfully request that you utilize your influence to defeat a regulation that could harm the people and families this program has helped. Without a compelling safety and soundness concern, FHFA's proposed rule is unnecessary. Thank you for your consideration.

Peace,

Jeff Johnsen, Executive Director Mile (High Ministries

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We continue to be grateful for the impact the AHP funding has made in the lives of our families at Joshua Station. The work done to make much needed upgrades in the community spaces including the kitchen as well as apartments is significant. Not only are we saving money on maintenance, but more important, community life at Joshua Station is enhanced. Building community and a sense of family is key to moving our families beyond homelessness.

Penny Salazar-Phillips, Joshua Station Director

I don't know what I would be dong today if it weren't for Joshua Station helping me feel hope again.

Joshua Station resident and mom

Thanks to Joshua Station I now have the strength to move beyond my past and the things that brought me to homelessness.

Joshua Station resident

Joshua Station has helped me to dream about the future my kids can have.

Joshua Station resident

We were 26 families making up one big family! Joshua Station will always be family to me.

Former resident teen

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