



December 22, 2014

Director Melvin L. Watt
Federal Housing Finance Agency
400 Seventh Street SW, Eight Floor
Washington, DC 20024

Attention: Comments/RIN 2590-AA39

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

Dear Director Watt:

As a leader of an organization that works in affordable housing and community development, I have been one of many on the front lines of a long-standing effort for safe, decent and affordable housing in neighborhoods in the state of New Mexico. The last several years have presented overwhelming pressures and struggles within the housing community as traditional sources of financial support have declined. One of the very few consistent resources for affordable housing grants in my state has been the Federal Home Loan Bank of Dallas. Every year, millions of dollars are provided across FHLB Dallas' five state District – providing for the unmet housing needs of low- and moderate-income working families.

Your proposal shrinks the overall amount of money flowing through the FHLBanks and into the communities served by their member institutions. That flow creates revenue and earnings that produce the FHLBanks' very ability to provide a variety of grants and services to those of us in the affordable housing and community investment sectors.

Without the participation of FHLB Dallas members like Los Alamos National Bank, stories like those of Greg White would not be possible. Greg is a resident at YES Housing's Mesa Del Norte community in Los Alamos. Greg lost his job in the economic downturn and lost his permanent housing. Before moving to Mesa Del Norte he was living in his car with his dog. YES received a \$252,000 Affordable Housing Program grant sponsored by Los Alamos National Bank to fund the renovation of this community and lower the rents so we could serve Special Needs individuals. This is just one example of the impact FHLB Dallas members have on our community.

The housing community has been hit continually by budget cuts, economic declines, and political opposition at the local, state, and federal levels. By imposing the additional membership requirements on the FHLBanks, we will no doubt experience a diminished amount of funding in the affordable housing space. We do not want changes to one of our last, truly dependable mechanisms for support. We request that you reconsider your proposal, and allow FHLB Dallas members to continue as a source of gap financing and other project funding in our neighborhoods.

Sincerely,

Michelle Den Bleyker
Vice President, Real Estate Development