

SO CAL HOUSING

Federal Housing Finance Board
1625 Eye Street, NW
Washington, DC 20006

RE: Federal Housing Finance Board; Proposed Rule; Excess Stock Restrictions and Retaining Earnings Requirements for Federal Home Loan Banks; RIN Number 3069-AB; Docket Number 2006-03

Dear Sir /Madam:

Thank you for the opportunity to comment on the Federal Housing Finance Board's proposed rule on excess stock and retained earnings requirements.

The Affordable Housing Programs (AHP) of the Federal Home Loan Banks (FHL Banks) are a critical source of affordable housing funds in the U.S. They involve a unique public-private partnership among the FHL Banks, their member institutions, community-based sponsors, state and local governments, and other entities.

Since the beginning of the Federal Home Loan Banks of San Francisco's AHP in 1990, the Bank has awarded approximately \$400 million in AHP grants to assist in the creation of over 70,000 affordable housing units. This flow of funds, based on 10% of the Bank's earnings, is made possible because of the Bank's financial strength and strong earnings. Our organization relies on these funds to build affordable housing in our communities.

Southern California Housing Development Corporation (So Cal Housing) is a non-profit affordable housing development company and social services provider that has created over 5,700 units of affordable housing for families and seniors in the five-county region. Several of those developments were made possible through the use of AHP funds, and over the past two years alone, So Cal Housing has received \$634,000 toward the creation of 167 new senior units in 2 communities.

Funds for the Bank's AHP are made possible through the borrowing activities of its members. The proposed rule, with its requirements to increase retained earnings by \$562 million and thereby decrease the dividends available to members, is likely to make membership in the Bank less attractive for some current members. The proposed ruling would require the combined FHL Banks to increase retained earnings by over \$3 billion, according to a Bank estimate. Some members, particularly larger ones, may choose to borrow less, reducing the profitability of the Bank and consequently, the net earnings that support the AHP.

The proposed regulations may also limit the ability of the Bank to provide additional voluntary contributions for affordable housing and community economic development initiatives, in addition to supporting the AHP, and we are especially concerned that the Finance Board does not seem to have devoted sufficient time to evaluating the impact of the proposed rule on the AHP and other voluntary contributions.

The overall impact of the proposed rule could be particularly adverse in this period of increasing mortgage rates and reduced federal funding for housing. It would be unfortunate if the enactment of this proposed rule caused families to be shut out of the housing market due to their inability to afford higher mortgage rates.

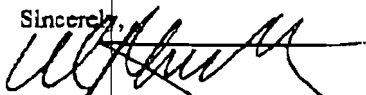
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We urge you to withdraw this proposed rule. Its impact could be extremely damaging to the efforts of our organization and similar organizations nationwide that are working to provide affordable housing opportunities for families in need. Thank you for your consideration of these comments.

Sincerely,



Welton R. Smith
Senior Director of Development