



Habitat for Humanity of Washington State

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TO: Chief Counsel's Office, Office of Thrift Supervision

RE: Comments on OTS NPR on community Reinvestment Published November 24, 2004

RULE NO. #2004-53 (RIN31550-AB48)

DATE: January 21, 2005

Habitat for Humanity of Washington State represents the 38 local Habitat for Humanity affiliates and chapters across Washington State. To date, we have built over 800 homes in partnership with first-time homebuyers who are between 25-50% of area median incomes. We will build another 100 homes this year. We build in all parts of Washington State. Our local Habitat affiliates and chapters are closely connected to their individual communities and benefit from effective Community Reinvestment Act programs and services.

We want to maintain strong CRA investments and services from all federally insured financial institutions for low and moderate income people, including those in our rural communities.

We do not support the proposed change to the definition of the community development test that would allow CRA credit for activities that benefit individuals in rural areas who are not low-or moderate income.

Thank you for the opportunity to comment on this important regulatory matter.

Sincerely,

Habitat for Humanity of Washington State