



The Affordable Housing Group

32 Woodland Avenue, Glen Ridge, NJ 07028
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January 20, 2005

Office of Thrift Supervision

Re: No. 2004-53 & 2004-54

To Whom It May Concern:

I am writing on behalf of the Affordable Housing Group to express my opposition to the Office of Thrift Supervision's proposed changes to the Community Reinvestment Act. The Affordable Housing Group provides housing consulting and technical services to sponsors and developers of affordable housing. In its efforts to preserve and expand the inventory of affordable and special needs housing, the Affordable Housing Group assists both non-profits and units of local government in the preparation of grant and funding applications and in the packaging of low and moderate-income housing projects.

The CRA has been instrumental in attracting development capital to projects located in low- and moderate- income communities. The changes that you propose would allow thrift institutions to:

- o Design their own watered-down Community Reinvestment Act exams and eliminate the investment and service parts of the CRA exam
- o Finance community development in affluent communities, not lower-income neighborhoods, in rural areas and areas afflicted by natural disasters.
- o Reduce opportunities for community groups and citizens to meet with thrifts and your agency to discuss CRA and anti-predatory lending issues when thrifts are merging.

These changes are contrary to the purpose of CRA which was designed to combat redlining of low and moderate income communities and will reduce the amount thrifts invest in these communities. Please withdraw your proposal. It is so ill-conceived that you are the only agency out of four banking agencies proposing it. If you have any questions, please call me at (973) 429-8600.

Thank you for your consideration.

Sincerely,

Donald Lubin
President