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January 27, 2005

Regulation Comments  
Office of the Chief Counsel  
Office of Thrift Supervision  
1700 G Street, N.W.  
Washington, D.C. 20552  
Attention: No. 2004-53 & 2004-54

To Whom It May Concern:

In reviewing the proposed changes to the Community Reinvestment Act (CRA) I stand opposed to the changes to regulatory oversight of the Community Reinvestment Act (CRA) by the Office of Thrift Supervision as promulgated in the Federal Register, Vol. 69, No. 226, 68257 - 68265. As the Director of Planning for an urban township in Trumbull County Ohio, I see the proposed regulations as a method to significantly reduce community development financing and thrift services in the underserved low-income communities CRA was designed to assist.

Trumbull County is one county in the Mahoning Valley Region of Northeast Ohio. This region has been severely impacted by the movement of large industries, most specifically industries manufacturing and supporting the production of steel, outside the region. As you can imagine, it is an area that greatly benefit by the current CRA program.

After years of sluggish growth, Trumbull County is finally in the process of developing an economic recovery strategy designed to begin the revitalization process for the region. Any changes effectively altering the overall plan of recovery for this area would have a devastating impact the revitalization process.

As a member of the American Planning Association, I stand with the Legislation and Policies Committee in our commitment to helping its members advance the revitalization of the nation's communities through good planning and development practices. I have seen first hand how CRA has been a critical resource in developing decent affordable housing for low- and moderate-income renters and homeowners across the this county. The desirability to locate homes in these areas is many times the catalyst for commercial investment and development throughout these neighborhoods. This commercial investment in turn provides employment and services to homeowners in a within a reasonable travel distance - many times walking distance - to their homes.

Under CRA, banks and thrifts have an affirmative and continual obligation to serve low- and moderate-income communities. Removal of these regulatory obligations would allow many of these institutions to ignore this type of development in less desirable area of our communities.

**Howland Township Government Offices: 205 Niles-Cortland Rd. N.E. Warren, Ohio 44484**  
**Howland Public Works Dept.: 3600 North River Rd. N.E. Warren, Ohio 44484**  
**Howland Police / Fire Offices: 169 Niles-Cortland Rd. N.E. Warren, Ohio 44484**

Although my township is one of the most affluent townships of the Mahoning Valley Region, the affects of economic development are regional. CRA has assisted the less affluent communities in enhancing the economic stability and overall quality of development throughout the region. Revitalization projects contribute to the marketability of the region. Growth encourages growth.

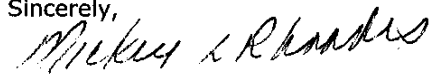
Therefore, I urge OTS to reject proposed changes to the CRA exam process. The proposed changes would in my opinion, be taken advantage of by short term for profit economic groups and to the detriment of long term progressive economic development. Community revitalization would be hindered by these short term projects at an increase burden to struggling regions.

Finally, the current review process involves a detailed process overseen by four responsible agencies, OTS, the Federal Deposit Insurance Corporation, the Federal Reserve Board, and the Comptroller of the Currency. This process has encouraged the involvement of local governments and community development organizations in the CRA process. In a time where the political environment promotes personal responsibility, to upset this process seems contrary to the goals of the present administration. Local involvement in revitalization projects should be encouraged, not discouraged. The proposed patchwork of regulations affecting different financial institutions may have a discouraging affect on public participation.

As a planner committed to increasing the quality of life within our communities, expanding housing opportunities, and increasing development in existing neighborhoods, I recognize CRA as one of the most important federal tools and incentives. Please take these comments into careful consideration during the review of the proposed changes to CRA. I ask that you reject the proposed regulations.

Thank you for your consideration.

Sincerely,



Mickey L Rhoades  
Director of Planning & Zoning

CC: Tim Ryan, Congressman 17<sup>th</sup> District, Ohio  
Tom Presby, Mahoning Valley Region Chamber  
Alan Knapp, Director of Trumbull County Planning Commission  
Alan Farmer, AICP APA Legislation & Policy