

DETROIT NON-PROFIT HOUSING CORPORATION

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Avis E. Holmes
EXECUTIVE DIRECTOR

BOARD OF DIRECTORS:

January 13, 2005

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Board Chairman

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

Dear Officers of OTS:

The Detroit Non-Profit Housing Corporation joins with the Detroit Alliance for Fair Banking and others who urge that no changes be made in the Community Reinvestment Act. Under provisions of the Act as it exists many construction projects have been enabled. Also, many low income residents of the Detroit Community have been successful in acquiring real estate finance for homes and businesses.

The proposed changes could very well end the existence of neighborhood bank/branches needed by minorities and low income community residents. Additionally, the proposed changes could close communication between the neighborhoods and banks on local community reinvestment issues and effectively increase opportunities for predatory lending in the absence of the neighborhood bank.

Raising the ceiling on CRTA diminishes the accountability that has been instrumental in community development. By raising the ceiling from \$250 million to \$1 billion, bank accountability virtually disappears since most development projects done in our community tend to cost under \$250 million.

We urge you to retain the CRA regulations that are presently in force which will promote development of construction projects in our community and provide access to banking services for residents.

Sincerely,

A handwritten signature in cursive script that reads "Avis E. Holmes". The signature is written in dark ink and is positioned above the typed name.

Avis E. Holmes, Executive Director