



September 10, 2007

Docket ID OCC-2007-0012

Office of the Comptroller of the Currency
250 E Street, SW
Mail Stop 1-5
Washington, DC 20219

Jennifer J. Johnson, Secretary

Attention: Docket No. OP-1290

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Robert E. Feldman, Executive Secretary

Attention: Comments RIN number 3064-AC97

Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Regulation Comments

Attention: ID OTS-2007-0030

Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

To Whom It May Concern:

Enterprise appreciates the opportunity to comment on the interagency proposed Questions and Answers (Q&As) regarding the Community Reinvestment Act (CRA). We would like to specifically address CRA regulations pertaining to investment in energy-efficient affordable housing developments, as well as to investment in foreclosure prevention and related community revitalization.

Enterprise is a leading provider of the development capital and expertise it takes to create decent, affordable homes and rebuild communities. For 25 years, Enterprise has pioneered neighborhood solutions through public-private partnerships with financial institutions, governments, community organizations and others that share our vision. Enterprise has raised and invested \$7 billion in equity, grants and loans and is currently investing in communities at a rate of a \$1 billion a year. Investments generated by the

CRA have directly contributed to the more than 215,000 affordable homes we have produced.

In 2004, Enterprise and a number of partners launched Green Communities, which aims to build 8,500 healthy, energy-efficient and environmentally sustainable homes that are affordable to low-income families. This is the nation's largest, most ambitious initiative focused on leveraging private capital investments to significantly increase the production of green affordable housing across the country. To date, just three years into the \$555 million, five-year initiative, Green Communities has helped to finance more than more than 9,000 highly sustainable homes in 217 developments in 23 states.

Enterprise's development experience coupled with research and widespread practice in the industry demonstrate the health, economic and environmental benefits of sustainable development for low-income people and communities. When determining whether a project is "affordable housing (including multifamily rental housing) for low- or moderate-income individuals", we urge the regulators to provide additional credit for housing that is energy efficient. Increasing energy efficiency in affordable housing delivers several important benefits. These include lower utility costs for low-income residents; more stable operating reserves for building or homeownership maintenance; and reduced carbon emissions. Further, energy efficient buildings are more durable, better performing and longer lasting, which to investors means more valuable properties to own and sell.

Suggested Q&A is as follows:

Q. When determining whether a project is "'affordable housing' for lower- or moderate-income individuals," thereby meeting the definition of "community development," will examiners take into account the extent to which an affordable housing project incorporates energy efficient features that lower the housing costs for residents and/or enhances the long-term viability of the project as affordable housing, such as through stronger reserves for maintenance and improvements?

A. In reaching a conclusion about the impact of an institution's community development activities, examiners may, for example, determine that a project that demonstrably lowers costs for residents and/or operates more viably as affordable housing a result of cost saving energy efficiency features may have a greater impact and may be more responsive to community credit needs than projects that do not have such features, and therefore provide additional credit for these investments.

Secondly, Enterprise commends the proposed Q&As that provide CRA credit for foreclosure prevention activities. The foreclosure crisis facing our nation is a threat not only to the thousands of consumers faced with losing their homes but also to entire low- and moderate-income communities that will likely become or continue to be plagued with concentrations of foreclosed properties in upcoming years. We applaud the agencies' efforts to provide favorable CRA consideration for loan programs and provide relief to low- and moderate-income homeowners facing foreclosure. We also encourage the

regulators to expand proposed Q&A .22(a)-1 and Q&A .23(a)-2 to include favorable consideration for lending and investment in activities that support the rehabilitation and resale of foreclosed properties in low and moderate-income communities.

The CRA is the most critical federal policy in ensuring that low-income families and communities across America are able to obtain and maintain affordable homes and apartments. We strongly urge the regulators to provide incentive for financial institutions to invest in energy efficient buildings and to help mitigate the foreclosure crisis by providing additional incentive for investing in foreclosed properties.

Please contact us with any questions or for further discussion.

Sincerely,

A handwritten signature in black ink that reads "Stockton S. Williams". The signature is written in a cursive, slightly slanted style.

Stockton S. Williams
Senior Vice President
Enterprise Community Partners, Inc.