July 15, 2010

Dear Sirs:

I write to support the continuation and expansion of the CRA program.

Our firm works to repair the fabric of communities throughout the United States. We work in many impoverished, distressed communities, building low and mixed income housing, schools and other community infrastructure. This work simply would not be financed, were it not for the CRA. And the results have been transformational.

We have seen communities ranging from Harlem and the South Bronx in New York City to the downtown neighborhoods of Albuquerque, NM revitalized by the power of CRA capital. Without the CRA, most of this housing, and the jobs that come with strengthened communities simply would not have been created.

As CRA moves forward, a few thoughts.

1) Integrate all Federal Efforts. HUD Secretary Shaun Donovan has done a tremendous job, reaching out to DOT, EPA, DOL, DOE, Treasury and other agencies to try to bring together all of the Federal Government's resources to make our metropolitan regions stronger. The CRA should have the same integrated approach. The program should include the comprehensive elements needed to fund the civic, cultural, educational, open space and transportation infrastructure needed to support healthy regions, **But this must not be done at the expense of the existing CRA investments in desperately needed affordable housing.**

2) Make it Green. All CRA investments should be required to meet the basic green guidelines of the Enterprise Green Community program. CRA should be investing in the best buildings of the future, not the last buildings of the past.

3) HUD should be charged with establishing indicators of metropolitan regional community health, by which the outcomes of CRA investments can be measured.

4) Performance data should be collected on CRA investments and made transparently available, so that we can continuously tune these investments toward results, based on the above indicator.

I hope that these four over arching ideas- integrate, make green, establish community health goals, and measure results, will help improve the program.

Warmly,

Jonathan F. P. Rose