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May 7, 2010

Mr. Scott Berman
Acting Chief Operating Officer
CDFI Fund
U.S. Department of the Treasury
601 13th Street St. NW, Suite 200 South
Washington, DC 20005

Dear Mr. Berman:

On behalf of the New Hampshire Community Loan Fund, I write to underscore the critical importance of a single aspect of the CDFI Fund's authorizing statute and ongoing practice.

Over the years, the CDFI Fund has made numerous equity investments in the Community Loan Fund, enabling us to continue financing the conversion of manufactured housing parks to resident ownership. To date, those conversions have helped the owners of 5,286 homes find a kind of financial security unknown to the owners of homes in conventional parks. We have also invested in low-income rental properties across New Hampshire, in micro-enterprises, non-profit child-care facilities, individual development accounts, and more.

We are one of the oldest CDFIs in the nation, one of the first to be CARS rated, and a Wachovia NEXT Award winner. We are proud of our successes and aware of how they reflect the wisdom of the CDFI authorizing statute, which allows the CDFI Fund to invest in us despite New Hampshire's overall wealth.

New Hampshire has a very low poverty rate, but it still has almost 100,000 people living below the federal poverty line (2008 American Community Survey) and these individuals are just as poor as people anywhere else in America. The CDFI Fund has helped the Community Loan Fund reach this population and the communities in which they live.

We know our borrowers and the depth of the economic challenges that many of them face. We know that stabilizing their housing is a profound community development tool, particularly because New Hampshire's relative affluence makes affordable housing extremely difficult to find for low-income households.

The key to this success is the CDFI Fund's ability to fund successful programs *wherever they are*. We have used CDFI Fund investments to finance projects for low-income people in

relatively wealthy areas – projects that would be impossible if the CDFI Fund were to target its funds primarily to distressed areas or areas of “high” housing need.

According to 2008 American Community Survey, the median price for an owner-occupied home in New Hampshire was \$260,300 and there were fewer than 30,000 homes in the whole state valued at less than \$100,000. To New Hampshire’s good fortune, those lower-cost homes are distributed widely across the state, not isolated in a few impoverished Census tracts.

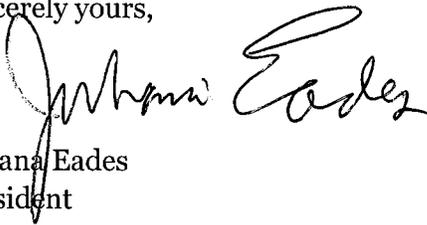
The New Hampshire Community Loan Fund believes that low-income people should be able to live, own a home, and work in any town. They should not be segregated in a few impoverished Census tracts. The CDFI Fund enables the Community Loan Fund to make that principle a reality.

We fear that we would lose that ability if the CDFI Fund were to adopt policies or definitions that would target areas of “high” economic distress.

Mark Pinsky makes the same point in his letter on behalf of The Opportunity Finance Network. The New Hampshire Community Loan Fund wishes to add its support to the positions presented by OFN on the full range of topics raised by the CDFI Fund’s request for comments. OFN has well represented our experience and the industry as a whole.

Please contact me if you have any questions about this letter or the role of the CDFI Fund in New Hampshire.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Juliana Eades". The signature is written in a cursive style with a large, looping initial "J".

Juliana Eades
President