



*Building Healthy Communities
Where Low-Income
People Live and Work*

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Affiliates

- Boston Community Loan Fund
- Boston Community Venture Fund
- Boston Community
Managed Assets
- BCC Solar Energy Advantage
- NSP Residential LLC
- Aura Mortgage Advisors LLC

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April 5, 2013

Lisa M. Jones
Manager, CDFI Bond Guarantee Program
CDFI Fund, Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Ms. Jones,

Boston Community Capital is pleased to submit these comments on the CDFI Fund's Interim Rule for the CDFI Bond Guarantee Program (the "Program").

Boston Community Capital (BCC) is a community development financial institution whose mission is to build healthy communities where low-income people live and work. Since 1985, BCC has provided over \$870 million in financing to projects and businesses that provide: affordable housing, good jobs, and new opportunities for underserved people and communities. These loans and investments have helped build or preserve affordable homes for over 13,700 families and individuals; strengthen more than 300 community organizations; support child care facilities serving over 9,800 children; finance schools and youth programs serving over 3,700 low-income students; finance health care facilities providing a comprehensive range of care to over 66,500 patients; renovate over 1.4 million square feet of commercial real estate and community facilities in distressed communities; create more than 1,500 jobs in low-income communities; generate over 8 million kilowatt hours of solar capacity; and provide fixed-rate mortgages that have allowed over 350 families facing foreclosure to remain in their homes.

Boston Community Capital has signed on to and supports the points raised in the comment letter submitted by Opportunity Finance Network. In addition, we believe that Program funds should be structured in such a way as to be available to finance residential mortgages provided through and consistent with the mission of CDFIs -- particularly mortgages intended to ameliorate the impact of the foreclosure crisis.

The foreclosure crisis has had a disproportionate impact on the communities we serve, destabilizing families and neighborhoods and threatening to erode the gains we have all worked so hard to achieve. BCC affiliates, through the Stabilizing Urban Neighborhoods (SUN) Initiative, stop the displacement of families and the neighborhood-destabilizing effects of vacancy and

Lisa M. Jones
April 5, 2013
Page II

abandonment by acquiring and financing foreclosed properties before evictions occur. SUN utilizes the decline in real estate prices in low-income areas to purchase foreclosed homes at current, distressed market values – often 50% less than the amount paid by the homeowner – and resell those same homes with 30-year fixed rate mortgages provided by Aura Mortgage, a CDFI affiliate of Boston Community Capital, to their existing occupants – owners and tenants – at a price they can afford. Since its launch in late 2009, SUN has helped over 250 Massachusetts homeowners repurchase their homes – reducing mortgage principal balances and monthly mortgage payments, on average, by 40% – and has prevented the eviction of over 350 Massachusetts households.

To date, Aura Mortgage has provided more than \$50 million in new mortgages; but much more remains to be done – both within Massachusetts and in other communities across the country that have been hard hit by the foreclosure crisis. Program funds that would allow CDFIs like Aura Mortgage to expand initiatives like SUN would substantially reduce the adverse impact of the foreclosure crisis on the communities we serve.

Best,



Elyse D. Cherry
CEO, Boston Community Capital