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May 8, 2006

Ms. Tracy Givielekian
Regulations and Paperwork Management Branch
U.S. Department of Agriculture
Rural Development
STOP 0742
1400 Independence Avenue, SW
Washington, DC 20250

Re: Community Facility Loans
OMB Number: 0575-0015

Dear Ms. Givielekian:

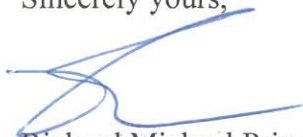
Thank you for the opportunity to comment on the extension of Community Facility loans. We believe that this is a valuable program that deserves to be extended. However, there is room for material improvement. This program appears to be operated in a very rigid manner, effectively excluding a number of worthy and laudable projects. Specifically, this program should and must be made useable to tax credit financing, including Low Income Housing Tax Credit financing. Community Facilities are often an integral part of housing facilities, such as properties offering special needs services, and also part of community redevelopment that has been given an added financial boost through the New Markets Tax Credits.

Specifically, RD should allow creative ownership structures where legal and equitable title are bifurcated, or where financing through the Community Facilities program is handled by non-profits and public agencies, which money is then loaned and/or administered through a tax credit for-profit entity that can use that money and leverage it with additional private investment through tax credits.

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Please allow these more creative approaches to leverage the federal financing of this program. Without it, this program will never achieve its full potential to help the public.

Sincerely yours,



Richard Michael Price