



July 31, 2008

Gary Van Meter  
Deputy Director  
Office of Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090

Dear Mr. Van Meter:

We understand the Farm Credit Administration (FCA) is currently accepting comments on a proposed regulation for the Farm Credit System's (FCS) Mission Related Investment Authority. Although we are neutral in our stance related to this regulatory authority for FCS, we would find value in this authority if it is conducted in collaboration with rural community banks and partner organizations. Rural community economic development is dependent on having broader financing tools which provide greater capital capacity and long-term fixed rate financing availability. When these tools are used in tandem with community banks and partners in rural communities, it allows for locally-led economic development.

The Minnesota Agri-Growth Council serves as an advocate for Minnesota's vast food and agriculture industry. Through stakeholder outreach and efforts to advance supportive public policies, the Agri-Growth Council advocates for Minnesota's farm and agribusiness community. Minnesota Agri-Growth is committed to working with elected officials, the news media, and stakeholders inside of and outside of the food and agriculture industry to advocate for its members. Agri-Growth is made up of over 200 members including agribusinesses, governmental and academia institutions, associations and organizations, energy companies, financial services organizations, service and consulting companies, transportation organizations, food companies and others. We understand the importance of supporting our rural communities that support agriculture. We strongly support additional capital in support of rural communities through the Farm Credit System.

The Farm Credit Association in our area has established this collaborative model in working with partners. It makes sense that this kind of approach is utilized under this authority. Our organization is interested in developing relationships with capital resources that provide rural communities access to a reasonable cost of funds and greater liquidity, especially in the current economic environment. A benefit of such a resource would be to establish new commercial market opportunities that can serve to grow the bank's client base and further the economic development of our rural community.

When the Farm Credit System offers these tools in collaboration with rural partners, as could be offered through the proposed regulation, it would create an opportunity for a new partnership which would provide enhanced access to USDA programs and industry expertise. In these situations, there is a win for the client, a win for the rural bank and a win for the Farm Credit Association. Most importantly, there is a win for the rural community. This collaborative approach is preferable to a competitive approach and provides rural America new economic development opportunities. We support our community bank and rural community having access to this funding process.

Sincerely,

A handwritten signature in blue ink that reads "Daryn McBeth".

Daryn McBeth,  
President