



January 26, 2026

Submitted Electronically

Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219
OCC-2025-0141

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
FRB Docket No. R-1876; RIN 7100-AH08

**Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
FDIC RIN 3064-AG17**

Re: Comments on Notice of Proposed Rulemaking – Revisions to the Community Bank Leverage Ratio (CBLR) Framework

Ladies and Gentlemen:

We appreciate the opportunity to comment on the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (collectively, the Federal Banking Agencies) Notice of Proposed Rulemaking to revise the CBLR framework.

Northrim Bank (Northrim) is a community bank headquartered in Anchorage, Alaska, with over \$3.3 billion in total assets and 20 branches stretching from Ketchikan in the Southeast, to Nome in the Northwest of Alaska, approximately 1,300 air miles apart. Northrim is also the primary mortgage servicer for the state housing authority, Alaska Housing Finance Corporation, servicing approximately \$1.6 billion in residential mortgages.

Although Northrim has not and does not intend to opt into the CBLR framework, we support regulatory improvements that benefit the broader banking industry, specifically those that pertain to community banks.



We support the proposed revisions that lower the CBLR requirement from 9% to 8% and extend the grace period from two to four quarters, which will reduce compliance volatility and improve planning stability.

We also encourage the agencies to eliminate the 25% Mortgage Servicing Asset cap from the CBLR. We believe that examination-based supervision is a more effective and tailored approach than a fixed cap.

Thank you for the Federal Banking Agencies' considering our views.

Respectfully submitted,

A solid black rectangular box used to redact a signature.

Michael Huston
Chairman, President & CEO