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To Whom It May Concern:

The Local Initiatives Support Corporation (LISC) is pleased to provide comments regarding the proposed merger of SunTrust and BB&T. LISC has partnered extensively with both institutions in support of our community development initiatives, and we look forward to ongoing collaboration and enhanced outcomes assuming the merger is approved.

Established in 1979, LISC is a national nonprofit housing and community development organization that is dedicated to helping community residents transform distressed neighborhoods into healthy and sustainable communities of choice and opportunity. LISC mobilizes corporate, government and philanthropic support to provide local community development organizations with loans, grants and equity investments as well as technical and management assistance. Our organization has a nationwide footprint, with local offices in 35 cities, and a national rural network where we partner with 90 organizations serving over 2,100 rural counties in 44 states. LISC invests approximately \$1.5 billion each year in these communities, and our work covers a wide range of activities, including housing, economic development, building family wealth and incomes, education, and creating healthy communities.

LISC has had a long term and valuable relationship with both SunTrust and BB&T. Most recently, the banks made a combined investment of \$30 million in support of LISC's expansion of operations into the Charlotte, North Carolina market, including \$10 million for the Charlotte Housing Opportunity Investment Fund (CHOIF), which LISC is managing. The CHOIF is an innovative fund which will finance approximately 2,000 units of mixed income housing for families earning 30- 120% of the area median income. To date, \$31 million has been raised for the CHOIF with a goal of \$50 million by the end of June. BB&T and SunTrust also earmarked an additional \$20 million for below-market rate loans to finance additional affordable housing outside of the CHOIF.

This is just the most recent example of support LISC has received from SunTrust and BB&T. Since our inception, LISC has received significant additional financial and technical support from the banks, including:

- **\$115 million of equity investments through the Low Income Housing Tax Credit program.** These investments supported the development or rehabilitation of 126 affordable housing properties and 9,300 units of affordable housing throughout the country, including senior housing, supportive housing and housing for persons with disabilities.
- **\$18 million of combined debt investments and equity investments through the New Markets Tax Credit program.** These investments supported the development of a grocery-anchored retail center in a low-income community in St. Petersburg, FL, as well as equipment and facilities financing for an upholstery fabric manufacturing firm that enabled the firm to expand capacity by 30% and create over 100 new jobs in a high poverty rural county in North Carolina.
- **\$5 million in debt capital from SunTrust to LISC** at a preferred interest rate, which we have used to support numerous community development projects identified by local LISC offices.
- **Over \$2.1 million in grants,** used primarily to support our local LISC office operations and program delivery. The general operating support grants have proven indispensable to building and maintaining a team of skilled community development professionals in our local LISC sites, and the programmatic grants have supported a number of local initiatives, including:
 - the development of a business investment district in a low-income community in northeast Washington, D.C.;
 - data gathering and outreach focusing on the housing and supportive services needs of at-risk populations in San Antonio, TX;
 - intensive resident engagement and community planning efforts in targeted neighborhoods in Cincinnati, OH; and
 - the delivery of financial coaching and workforce services at our network of Financial Opportunity Centers in Houston, TX and Richmond, VA.
- **In-kind services.** SunTrust and BB&T officials have provided critical in-kind support to LISC by service on advisory boards and committees at our local LISC sites, including sites in Houston, Richmond, San Antonio and Washington, D.C.

In short, LISC has partnered substantially with both institutions over the years in support of our community development work. Both institutions have been exemplary partners to LISC, as evidenced by BB&T's most recent "outstanding" CRA rating. We support the merger of these two institutions with the full expectation that together they will invest even more in low-moderate income communities than the two separately have done, and LISC commits to work with them to help make sure that this happens.

We thank you for consideration of these comments.



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