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To: [Comments](#)
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To Whom It May Concern:

I live in a mixed-income neighborhood in a small city. I have served on the board of a local CDFI (Community Loan Fund of the Capital Region) and have seen just how crucial the modest investments from CRA-regulated banks have been to the loans this organization is able to make to small businesses, nonprofits, and affordable housing developers in our region. These investments are high touch, essential to the communities that get them, and wouldn't happen under a single-ratio approach.

I oppose the changes to the Community Reinvestment Act (CRA) regulations proposed by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), for the following reasons:

The proposal redefines community development to include large infrastructure projects like stadium improvements in LMI Opportunity Zones which further encourages banks to seek out larger deals over smaller loans to meet the ratio for the total dollar volume metric. The proposed changes will encourage banks to seek out large dollar community development deals to quickly get to a single total dollar volume metric and discourage loans to people with low- and moderate-incomes LMI and small businesses because the loans are much smaller. The new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams

I've had trouble getting contractors to come to my house because of where I live. But at least I know that banks need to serve my community somewhat because of CRA. If they can ignore half of their assessment areas, banking deserts will only grow, and communities like mine will suffer. (We already lost our most local bank branch--CRA is not strong enough!)

It is clear that the proposed rules would weaken CRA. The focus on LMI communities would be lost - the exact intent of CRA when it was signed in 1977. This backtracking would violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will augment the progress achieved under CRA instead of

reversing it.

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