



Federal Deposit Insurance Corporation
Executive Secretary Robert E. Feldman
550 17th Street NW
Washington, DC 20429

February 26, 2020

**Re: Community Reinvestment Act Regulations
Docket ID RIN 3064-AF22**

Dear Executive Secretary Feldman,

I am writing on behalf of the Federated Indians of Graton Rancheria (the Tribe) to express our strong support for the Notice of Proposed Rulemaking (NPRM) modernizing the Community Reinvestment Act (CRA). The proposed regulations provide financial institutions with clarity as to the types of activities that count for CRA credit. We especially support the express inclusion of Indian Country after decades of uncertain standing. These long-overdue regulations will help underserved communities, like Indian Country, access capital more readily.

Pursuant to the CRA, banking institutions get “credit” for certain types of activities aimed at meeting the banking needs of the low- and moderate-income (LMI) communities in which they operate. A certain amount of CRA credit is required for a bank to gain approval to expand their market. Unfortunately, under current rules it is difficult to identify activities that count for CRA credit. By regularly publishing a list of qualifying activities, as proposed in the NPRM, financial institutions will be able to strategize their CRA activities to more meaningfully impact their respective communities. The proposed list includes activities specifically aimed at increasing investment and banking services that are important within Indian Country and disadvantaged communities alike. The list encourages investment in necessary infrastructure projects and community facilities like schools and health centers. Additionally, the proposal enhances the impact of successful federal programs that tribes and other LMI communities already utilize by providing credit for funding projects that support federal programs.

The CRA has not been updated in twenty-five years, while the banking sector has changed dramatically. Under the existing CRA framework, Indian Country is largely left out because banks only get CRA credit for qualifying activities performed in proximity to their physical banks. The current proposal reflects the rise of online banking and accommodates areas of the country, like Indian Country, where physical bank branches are scarce. The NPRM gives financial institutions CRA credit for qualifying activities within Indian Country and other distressed areas regardless of an institution’s geographic area and, further, provides extra CRA credit for working with these

high need communities. This type of creativity addresses the overlooked needs of Indian Country, supports the federal trust responsibility, and allows tribal governments to meet the basic needs and services of their citizens.

The NPRM is a necessary and timely approach to ensuring investment and financial services meet the broad needs of LMI communities and Indian Country. The Tribe strongly supports this effort.

Sincerely,



Greg Sarris
Tribal Chairman