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EXECUTIVE SECRETARY

February 14, 2020

Robert Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th St, NW
Washington, DC 20429
Attention: Comments, RIN 3064-AF22

Dear Mr. Feldman:

Central Valley Community Bank ("CVCB") is a \$1.6B Community Bank serving the 9 contiguous Counties in the Central Valley of California. We are primarily a business bank, but serve the needs of consumers in all the communities we currently operate in. The FDIC is our primary federal regulator.


We want to thank you and the OCC for your leadership in drafting a proposal which we would like to comment on. As we enter into our 40th year of serving the Central Valley we are committed to the goals of CRA and meeting the credit and financial needs of the communities we serve. We have long believed that an update to the CRA would benefit both financial institutions and the communities we serve by clarifying and modernizing the rules to make us all more efficient and effective.

We would like to comment on the following:

1. Expanded criteria for qualifying activities. We applaud the language that clarifies and expands the activities that would qualify. We agree with the language that allows for credit that partially, but not exclusively, benefit LMI individuals and we agree with the valuing of activities involving CDFI's, and other affordable housing loans and activities. We often run into a lack of certain investment types in our defined area, so expansion of "what qualifies" is positive.
2. Confirmation process. We agree that a process for communicating with our regulator on whether an activity qualifies is a very positive step, although the 6-month turnaround is far too long. We would suggest this could be accomplished in 30-45 days.
3. Illustrative list of qualifying activities. Being able to seek "best practices" from your website from banks across the nation will improve our focus on the right activities. It could bring new ideas to areas that have not tried new things for year.
4. Community Development Service Hours. The proposal to track CD Service hours is too complicated and places a burden on banks of all sizes, but clearly would for our bank. We would suggest the simplicity of just tracking hours.
5. Small bank opt in. We were disappointed the proposal did not consider the efforts of banks our size and set a limit higher than \$500 million. 3 years ago, we crossed from the Intermediate Small Bank test to the Large Bank test under current rules. The extensive efforts needed to ensure a Satisfactory rating in our last Exam prompted me to wonder why a bank our size would be considered under the same tests as a \$50B or larger bank? Considering the significantly larger resources a "large bank has. I would think a limit such as \$5B would be more reasonable for the Large Bank Test.

We appreciate the opportunity to comment on these important items.

Sincerely,


James M. Ford
President & CEO