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April 6, 2020

Karen McSweeney, Special Counsel
Chief Counsel's Office, Office of the Comptroller of the Currency
United States Department of the Treasury
400 7th Street SW
Washington, DC 20219

Chair Jelena McWilliams
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Chair Jerome H. Powell
Federal Reserve Board of Governors
20th Street and Constitution Avenue N.W.
Washington, D.C. 20551

RE: Re: Comments on OCC-2018-0008 - Reforming the Community Reinvestment Act Regulatory Framework

Special Counsel McSweeney, Chair McWilliams, Chair Powell:

I am writing on behalf of the Urban Redevelopment Authority of the City of Pittsburgh (URA), in opposition to the Office of the Comptroller of the Currency's proposed Community Reinvestment Act (CRA) rule changes. Instead of modernizing CRA, the URA believes the proposed changes will in fact undermine the law's very purpose and set our community back decades. The City of Pittsburgh and our residents cannot risk losing over 40 years of hard-won investments made by banks since the passage of CRA.

While a more transparent CRA scoring system would be beneficial to all community development stakeholders, including the banks, the proposed rule changes seek to exploit this need at the expense of the overall spirit of law. Most threatening to our low-income and moderate-income (LMI) neighborhoods is the proposed implementation of a single metric ratio that untethers CRA performance from the needs of local communities. This change will dramatically reduce the effectiveness of the CRA by encouraging financial institutions to think large, not local.

Utilizing a single metric that is determined primarily by the cumulative dollar value of CRA-eligible activities incentivizes banks to focus more on large capital events rather than a plethora of unique local needs. This emphasis on the dollar value of the CRA-eligible activities rather than the qualitative value to the community of these activities is clearly reflected in the proposal, as a bank could fail to meet standards in up to 50 percent of their assessment areas and still receive a satisfactory, if not better, CRA rating.

We have no illusions about the need for a comprehensive CRA update - one that reflects the realities of modern banking - but it cannot come at the expense of our most vulnerable populations. Any update must address the pervasive, race and class-based injustices that modern lending institutions perpetuate to this day. We urge the FDIC and OCC to discard this proposal and to work with the Federal Reserve Board to write and propose an interagency rule that reflects the best, not the worst, of our American values. Please contact David Geiger (dgeiger@ura.org) on my staff with any additional questions.

Sincerely,

[redacted]

Greg Flisram
Executive Director
Urban Redevelopment Authority of Pittsburgh