



Robert E. Feldman, Executive Secretary  
Comments: RIN 3064 AF22  
Federal Deposit Insurance Corporation  
550 17th street, NW  
Washington DC 20429

Re: Community Reinvestment Act regulations, proposed rulemaking  
FDIC docket ID: RIN 3064- AF22

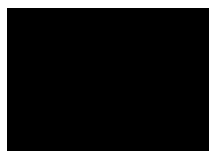
The Windham and Windsor Housing Trust, a NeighborWorks Network Member, has reviewed the proposed changes to the Community Reinvestment Act and discovered these changes fall short of our community's needs. As the Housing Trust has served as an established lending provider to low and moderate-income populations in rural southeast Vermont, it is apparent the revisions to the CRA would result in significantly fewer loans, investments, and services. The implications of this would have very real and negative repercussions on our community.

We identified several areas of concern with the proposed revisions:

- With ratings based largely on CRA activity divided by deposits, banks will be encouraged to seek out large dollar deals and will discourage smaller dollar loans
- Weakening the system that gives credit to banks for having branches in LMI communities would likely lead to massive branch loss of presence in communities that are already underserved; this will have a catastrophic effect on our rural communities
- By not accurately measuring its responsiveness to local needs, public accountability by the banks would be lessened
- Relaxing the definition of affordable housing to include middle-income housing in high cost areas would result in diverting necessary capital from serving our most vulnerable populations
- Redefining small businesses and family farms with higher revenues would again encourage banks to focus on larger loans to bigger businesses instead of smaller community style loans, which will constrict earning and opportunity potential for vulnerable LMI populations

In Vermont, where a 30-unit development is considered large, where rural communities have local branch banks investing in the community with the encouragement CRA metrics, the proposed changes would dramatically impact our abilities to support our most vulnerable members. We urge the reconsideration of the proposed CRA changes with empathy and understanding of our more at-risk communities.

Sincerely,



Elizabeth Bridgewater, Executive Director

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