

RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

To Whom It May Concern:

On behalf of Nourish All, a nonprofit organization focused on community development through food justice, I appreciate the opportunity to comment on the Notice of Proposed Rulemaking (NPR) on the Community Reinvestment Act (CRA). We believe that the proposed changes to the CRA regulations outlined in the NPR are strong -- however, the CRA will be **more effective in its goal of stabilizing and enhancing underserved communities if activities promoting food justice are included as eligible for CRA credit.**

We urge you to note **greater specificity and inclusion of food access and sustainability projects** in the new rules – projects **such as community gardens, edible landscaping, and climate regeneration**. Investment in food access and sustainability is of utmost importance in the wellbeing and development of our communities, nationwide.

Food insecurity, poor nutrition and health, and climate change are growing challenges and disproportionately affect low-income communities. Currently, 38 million Americans [struggle with hunger](#) despite a record \$122 billion in food aid spending. [Health burdens from urban heat](#) are worst in historically redlined communities for [lack of green space](#) and tree cover common in wealthier, Whiter communities.

Nourish All is meeting these challenges with food justice work, introducing a novel concept of **affordable living**: affordable housing coupled with regenerative food gardens that act as both a form of community development and climate remediation. We create edible gardens directly on-site at affordable housing properties. Countless other organizations are addressing the intersection of food security, health, and climate with food justice work as well, building healthier and more productive communities.

Our collective food justice work offers abundant, diverse benefits for low- and moderate-income (LMI) communities through physical, mental, financial and social health. Participating in community gardens increases fruit and vegetable intake, improves food choices and cuts food spending— effects that are disproportionately stronger [for food-insecure households](#). Many studies on gardening [show evidence](#) of increased physical activity and lower BMI; reductions in stress, depression and anxiety; increased socialization and sense of community; and [improved quality of life](#). Gardening [increases children's likelihood](#) of eating fruits and vegetables, establishing healthy habits at an early age. For seniors, learning new skills has also [been shown](#) to maintain strong cognition and memory. Deploying food justice projects directly in low-income communities creates steady, on-site access to fresh food. Thereby, it removes time and financial burdens, reduces the challenges of managing monthly SNAP benefits and builds resilience to volatility in personal finances, grocery prices and strained supply chains.

Regarding the CRA proposed reforms, we call you to reward for food justice work. We urge you to denote food access and sustainability projects as eligible activity, and consider specifically calling out affordable living projects as eligible community development activity. Awarding

credit for investment in these areas would encourage and enable developers and lenders to plan food security and sustainability into their work serving LMI communities.

Nourish All appreciates the consideration of food justice in underserved communities as a critical part of CRA. A strong a clear CRA with inclusion of food access and sustainability projects offers potential for greater collaboration between community-based organizations, developers, and banks to invest in and create healthier, wealthier communities.

Thank you for providing this opportunity for us to comment on this critical rulemaking.

Sincerely,

Samantha Koches
Founder and CEO, Nourish All
www.nourishall.org