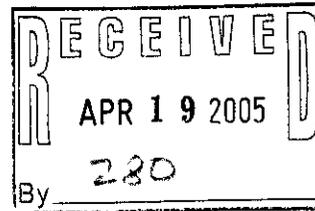


# ALLIANCE FOR HEALTHY HOMES

Protecting Children from Lead and Other Environmental Health Hazards

April 14, 2005

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th St. NW, Washington DC 20429  
RE: RIN 3064-AC89



Dear Mr. Feldman:

The Alliance for Healthy Homes urges the Federal Deposit Insurance Corporation to enhance the proposed changes to the Community Reinvestment Act (CRA) rules so that banks do not reduce the number of branches and community development investments to low- and moderate-income communities.

The Alliance believes that the CRA can be used effectively to fund the rehabilitation of older, distressed housing in low- and moderate-income communities, including those in traditionally underserved rural areas. This rehabilitation can include the remediation of lead hazards and the correction of other health hazards commonly found in distressed housing. Such investment can assist American communities in reaching the Federal government's goal of eliminating childhood lead poisoning by the year 2010.

The Alliance believes that the current CRA exam structure is an effective method of maximizing the level of community development financing. If you move to a new exam format, you must ensure that community development financing does not decline significantly.

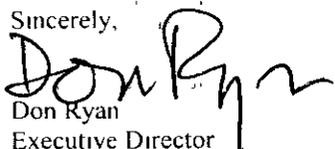
The Alliance is concerned that deleting the separate test for retail services will result in CRA exams no longer holding mid-size banks accountable for the number of bank branches and low-cost accounts in low- and moderate-income communities. Eliminating or moving bank branches can make it more difficult for residents of low-income communities to meet face-to-face with bank personnel to discuss financing options for property renovations and rehabilitation and can therefore lead to a decrease in the number of low-income property owners reducing health hazards in their homes. The Alliance urges FDIC, OCC, and the Federal Reserve Board to add a provision on the number of bank branches in low- and moderate-income communities as a clear factor on the proposed CRA exams for mid-size banks.

The Alliance is also troubled by the proposed elimination of public data disclosure requirements regarding community development lending. The only way to hold mid-size banks accountable for providing credit to small firms and for affordable housing and community development is if the CRA data remains publicly available. The proposed rule must not change the requirement that community development in rural areas must benefit low- and moderate-income areas and distressed communities.

In addition, the Alliance urges the FDIC to retain a separate community investment test as part of the CRA rules. This separate test encourages mid-sized banks to make more community development investments because their investment performance is more visible than it would be if the separate investment exam were to be folded into a general community development test.

Thank you for your consideration.

Sincerely,

  
Don Ryan  
Executive Director

