

From: Schlorholtz, Esther [mailto:ESchlorholtz@bostonprivatebank.com]
Sent: Tuesday, May 10, 2005 4:42 PM
To: Comments
Subject: CRA Regulatory proposed changes

May 10, 2005

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington DC 20551
RE: Docket No. R-1225

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

Office of the Comptroller of the Currency
250 E St. SW, Mail Stop 1-5
Washington 20219
RE: Docket Number 05-04

To Whom It May Concern:

On behalf of Boston Private Bank & Trust Co., I am writing to urge you to enhance your proposed changes to the Community Reinvestment Act (CRA) regulations to help ensure that banks do not reduce their banking services, community development loans and investments to low- and moderate-income communities.

Boston Private Bank & Trust Company, which has an Outstanding CRA rating from our regulators, is committed to meeting the banking needs of our entire community, including low- and moderate-income people and neighborhoods. We believe that community investment is good business and that CRA works. It has been the catalyst for increased availability of loans and investment in lower income neighborhoods, as well as low-cost banking services, that have contributed to the revitalization of entire communities.

The current proposal is an improvement from the one issued in the fall. However, we remain concerned that the proposed changes could potentially result in a decline in resources for community investment in low- and moderate-income communities.

We are pleased that you have changed your proposal to allow mid-size banks with assets between \$250 million to \$1 billion to limit offering community development loans, investments or services. We agree that Banks should be expected to engage in all three

of these essential community development activities in order to pass their CRA exams as your current proposal requires. If you move to a new exam format, we encourage you to identify ways to ensure that significant declines of community development lending, investments and services do not occur.

Investments in affordable housing and economic development build wealth for families and communities and thus open up new markets for bank lending and services. As a result of CRA, we have sought complex and innovative investments to benefit low- and moderate-income people and communities -- investments that we may otherwise not have made. We think it is important that mid-size banks continue to have this strong incentive to maintain their level of investment in lower income communities.

We encourage you to reconsider your proposed elimination of public disclosure requirements regarding community development, and small business and farm lending. The data made available since the inception of CRA has proven invaluable in measuring the responsiveness of banks to critical needs of lower-income communities. We believe that the availability of this information will mean that mid-size banks will continue to be accountable for providing credit to small firms and for affordable housing and community development.

Thank you for your consideration of these comments. Please feel free to contact me at 617-912-4209 or by e-mail at eschlorholtz@bostonprivatebank.com.

Sincerely,
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Senior Vice President & CRA Officer

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