



Utah Housing Coalition

Promoting Affordable Housing to Ensure Healthy & Stable Communities



May 17, 2013

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Mail Stop 9W-11
400 7th Street, SW
Washington, DC 20219
Docket ID OCC-2013-0003

Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. OP-1456

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Community Reinvestment Act (CRA): Interagency Questions and Answers
Regarding Community Reinvestment

Dear Sir or Madam:

The Utah Housing Coalition (UHC) appreciates the opportunity to comment regarding the proposed revisions to the Interagency Questions and Answers Regarding Community Reinvestment (CRA Q&A).

In particular, we would like to respond concerning whether the CRA Q&A:

- a) recognizes the appropriate value of community development lending, while allowing flexibility based on a performance context consideration; and,
- b) helps to promote additional community development lending.

Recently, banks in our area have become reluctant to make longer term community development loans, expressing a preference for annually renewing lines of credit in order to assure that they will receive continuing CRA credit for a loan, not just for the year in which the loan was originated. Often, community development loans are challenging, particularly for projects where flexibility and creativity are critical to a project's success. Regardless of which CRA test banks are evaluated under, it would be helpful if all banks could receive credit for outstanding balances on loans made in previous years. This would encourage the banks to make longer term loans and would help promote flexibility in responding to the needs of affordable housing developers. It would also increase a bank's willingness to consider more complex and time consuming community development loans.



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UHC is a non-profit organization founded in 1973 in Utah with a mission to promote the increase and preservation of, affordable accessible housing statewide and to be the leader in affordable housing issues. We achieve our mission through education, advocacy and cooperative partnerships, and we are dedicated to bringing affordable housing to the forefront of the state's economic policy agenda. We have more than 100 diverse coalition members represented by individuals, financial institutions and non-profit housing developers throughout the State of Utah. *(Please see attached list of coalition members).*

Although Utah was a leader in homeownership and economic success for many years, there was still a lack of sufficient affordable housing opportunities in the state. The need for affordable housing continues to grow, particularly following the recent economic turmoil and its impact on our local communities. 75% of our extremely low income (30% AMI) renters experience severe cost burden; paying more than ½ of their income on rent and utilities. A recent report from the National Low Income Housing Coalition indicates we have a shortage of 49,526 units affordable and available for extremely low income renters. CRA is a much needed tool in addressing the problem of extremely low income stable housing for our community and the partners who develop this stock.

Thank you for the opportunity to comment. We greatly value the proactive approach and cooperative spirit toward community development demonstrated by the numerous financial institutions doing business in Utah, and we encourage you to provide more clarity and flexibility regarding community development lending. Please feel free to contact us with any additional questions.

Sincerely,

Tara Rollins
Executive Director

UHC 2012 - 2013 Membership

AARP
AAA Fair Credit Foundation
Adams Construction & Management
American Express Center for Community Change
AmericanWest Bank
Artspace Inc
ASSIST Inc
Bank of American Fork
Bear River Association of Governments
BEBR U of U
Boston Capital
Canyon School District
Cedar City Housing Authority
CHASE
CIT Bank
City of Orem
City of South Salt Lake
City of Taylorsville
City of West Jordan
College of Architecture & Planning
Community Action Services and Food Bank
Community Development Corp of Utah
Community Housing Services
Cornerstone Financial Education
Crossroads Urban Center
Daniel Moser
David Hughes
Davis County Housing Authority
Dimension Realty Services
EMG Management
Enterprise
Family Promise - Salt Lake
Farmington City
Federal Home Loan Bank of Seattle
Financial Guidance Center
Five County AOG
FJ & Associates
GE Capital Bank
GE Money Bank
Goshute Housing Authority
Grand County
Habitat for Humanity of Southwest Utah
Harold P. Woodruff Architect
Homeless Veterans Fellowship
Horizon Development & Management
Housing Authority of the County of Salt Lake
Housing Authority of Utah County
JP Morgan Chase
Lake Hill & Myers
Midvale City
Morgan Stanley
Mountainland Association of Government
Mountainlands Community Housing Association
National Equity Fund
Navajo Housing Authority
Neighborhood Nonprofit Housing Corporation
NeighborWorks Salt Lake

Northwest Integrity Housing
NW Band Shoshoni Nation HA
Ogden City
Ogden Weber Community Action
Oiene Walker Housing Loan Fund
Options for Independence
Park City
Pitney Bowes
Price City
Provo City Housing Authority
Questar Gas
Red Rock Center for Center of Independence
Republic Bank
Restore Utah
Roosevelt City Housing Authority
Rural Community Assistance Corporation
Rural Housing Development Corporation
Salt Lake City Corporation
Salt Lake Community Action Program
Salt Lake Habitat for Humanity
San Juan Credit Union
Sellers Management & Development
Six County AOG
South Eastern AOG
Sprout Utah
St Anne's Center
Summit County
The La Porte Group
The Richman Group
The Road Home
Tooele County Housing Authority
Turn Community Services
UBS Bank USA
Uintah Basin AOG
University of Utah
Utah Apartment Association
Utah Center for Affordable Housing
Utah Community Action Partnership
Utah Community Reinvestment Corporation
Utah County Association of Realtors
Utah Housing Alliance
Utah Housing Corporation
Utah Independent Living Center
Utah League of Cities and Towns
Utah Nonprofit Housing Corporation
Utah Paiute Tribal HA
USU - Family Life Center
Utah State University
Ute Mountain Housing Authority
Vernal City
Veterans Advisory Board
Volunteers of America, Utah
Wasatch County Housing Authority
Wells Fargo
West Valley City Housing Authority
Western Regional Nonprofit
Work Activity Center
Yes Housing, Inc
Zions's 1st National Bank

