



Detroit Shoreway Community Development Organization

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January 15, 2020

RE: Opposition to Proposal to Modernize Community Reinvestment Act Rules

To Whom It May Concern:

I am writing to express Detroit Shoreway Community Development Organization's opposition to the proposed rules changes to the Community Reinvestment Act for the following reasons:

- The proposed changes count infrastructure investments like bridges and investments in sports stadiums as investment in low-moderate income neighborhoods. These sorts of investments may be beneficial but do not meet the credit needs of low-moderate income communities which is the purpose of CRA
- The proposed changes alter the Assessment Area and give credit for CRA activity outside of the Assessment Area.
- The "One Ratio" calculation being the determinative factor in CRA evaluation will significantly decrease the focus on low – moderate income areas by counting CRA activity over the bank's entire geographic area. This devalues the importance of retail bank branches and retail lending.
- The CRA will be less transparent
- Increasing the time for rating of "Outstanding" banks from two years to five years will lower accountability
- Exempting small banks will result in no obligation of banks to meet the credit needs of the communities that they serve.

Ultimately, we believe these changes will hurt low to moderate income communities such as ours.

Sincerely,



Jeff Ramsey
Executive Director