

**From:** [REDACTED]  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-AF22 - Comment on Proposed Rulemaking for Community Reinvestment Act  
**Date:** Wednesday, February 19, 2020 4:51:39 PM

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RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

To Whom it May Concern:

I STRONGLY oppose the proposed changes to the Community Reinvestment Act (CRA) regulations as deeply misconceived. The OCC and FDIC would lessen the public accountability of banks to their communities by enacting unclear performance measures on CRA exams that would not accurately measure a bank's responsiveness to local needs. Contrary to the agencies assertions that their changes would increase clarity and CRA activity, the result will be significantly fewer loans, investments and services to low- and moderate-communities (LMI).

The agencies would dramatically lessen CRA's focus on LMI communities in contradiction to the intent of the law to address redlining. The definition of affordable housing would be relaxed to include middle-income housing in high cost areas. In addition, the Notice of Proposed Rulemaking (NPRM) would count rental housing as affordable if lower-income people could afford to pay the rent without verifying that lower-income people would be tenants.

I grew up in Savannah, GA and saw first-hand the effects of disinvestment by banks and government in inner-city, African-American neighborhoods.

I am now in Nashville, TN, where for 34 years, I worked for a church agency and a non-profit that helped disadvantaged communities. For most of that time, I lived in one of these neighborhoods. On one occasion, we had to threaten to protest in front of a bank so that a family could get a mortgage loan. Residents of these neighborhoods worked hard to improve their areas. One group converted an old beer tavern into a community-owned neighborhood center and turned a vacant building into 5 apartments for low-income families, using federal grant money. But the neighborhood did not turn around until private investment came back – because massive gentrification was happening – and lower-income people were being moved out.

Recently, a challenge to First Tennessee in Chattanooga revealed that the bank had made ONE loan in ten years to an African-American family. This type of disinvestment was a major factor in the neighborhood deterioration that I saw in Savannah and in Nashville. Without strong CRA regulations, this will continue.

There are other serious problems with the proposed rules. But overall, the problem is weakening requirements upon banks to be fair – to serve everyone – and to invest instead of

DIS-invest.

Sincerely,

Mike Hodge



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