



April 8, 2020

RE: (**RIN 3064-AF22**) Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

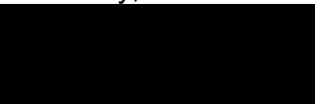
Dear Federal Deposit Insurance Corporation:

Solar Oregon opposes the proposed changes to the Community Reinvestment Act (CRA) regulations. The Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (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-income communities (LMI).

Solar Oregon is a nonprofit that has educated and advocated for solar consumers in our region for over 40 years. Residential solar is a powerful mechanism for family wealth building, increasing neighborhood energy resilience, and decreasing energy burden. However, access to solar and its benefits is dependent on access to financing and homeownership. Ownership of solar energy production is already highly concentrated in more affluent white communities, and the present proposed changes to the CRA by the OCC and FDIC would significantly decrease access to solar by minority and LMI communities even further. As an organization that advocates for increasing access to solar energy ownership for all, Solar Oregon strongly opposes the proposed changes.

The proposed changes will violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the Notice of Proposed Rulemaking, and instead work with the Federal Reserve Board and propose an interagency rule that will augment the progress achieved under CRA instead of reversing it.

Sincerely,



Corey Omey

Solar Oregon Board President