

**From:** Tami Dodel [REDACTED]  
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**To:** Comments  
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03/10/2020

To Whom It May Concern:

I have been a property manager in the low income and affordable housing industry for over 39 years now and I want to state that if the Community Reinvestment Act (CRA) is revised with the new rules proposed, this will affect the ability to build VERY NEEDED affordable housing. If companies, that are currently building low income and affordable housing are unable to secure bank loans or use tax credits, how are we supposed to finance the projects in the future. IT IS ESSENTIAL that we continue to have funding available for low income and affordable housing projects.

Not all American's can afford Market Rate housing units, whether it be an apartment, condo or single family housing. Unless we continue with a national commitment to build affordable low income housing, there will be an even bigger homeless situation. Believe me, if you want to continue to have more individuals living on the street because they can't afford market rate housing, then go ahead, abolish the current system, and then in 2-5 years, you will realize that what you did was wrong and will have to reinitiate the same rules you decided to abolish. Save time and money and leave the rules for low income and affordable funding alone and COMMIT MORE MONEY TO BUILD LOW INCOME AND AFFORDABLE HOUSING INSTEAD. Instead of wasting tax payers dollars on fake impeachment hearings or fake Russian vote intrusion, you could have built many affordable housing projects with this money.

Wake up and smell the coffee, we NEED more affordable, low income housing NOW and not later when you have an even bigger crisis on your hands.

If you really love American and what American stands for, allocate more funds for low and affordable housing. Thanks for reading and listening to the voice of America!!!!

We oppose the changes to the Community Reinvestment Act (CRA) regulations proposed by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), for the following reasons:

The proposal would make it so banks no longer have an obligation to make mortgage loans in neighborhoods with low and moderate incomes., The new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams, The proposed changes will encourage banks to seek out large dollar community development deals to quickly get to a single total dollar volume metric and discourage loans to people with low- and moderate-incomes LMI and small businesses because the loans are much smaller, The system that gives credit to banks for having branches in LMI communities is weakened and will likely lead to massive branch loss in communities that are already underserved, The proposal redefines community development to include large infrastructure projects like stadium improvements in LMI Opportunity Zones which further encourages banks to seek out larger deals over smaller loans to meet the ratio for the total dollar volume metric, The definition of affordable housing would be relaxed to include middle-income housing in high cost areas, The proposal would redefine small businesses and family farms with higher revenues again encouraging banks to focus on larger loans to bigger businesses instead of smaller community-style loans., The proposal would lessen the public accountability of banks by not accurately measuring its responsiveness to local needs.

Working and managing low and affordable income housing has been a great blessing in my life for the last 39 years. I have seen people come off the streets that couldn't afford housing, to have an apartment that they could afford. I have seen the cronic homeless finally have a place they could call home, not afraid to sleep at night and become a vital part of society that started helping their community. Low Income and Affordable Housing is ESSENTIAL to America!!!

It is clear that the proposed rules would weaken CRA. The focus on LMI communities would be lost - the exact intent of CRA when it was signed in 1977. This backtracking would violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will augment the progress achieved under CRA instead of reversing it.

Tamra Dodel

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Property Manager

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**Mahalo and Have a Wonderful Day,**

Tami Dodel