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To Whom It May Concern:

Neighborhood Recovery Community Development Corporation provides revitalization efforts and services across the Houston area with a focus on affordable housing, economic and commercial development, financial literacy and asset building, and community engagement and health. At the base of all that we do are the people and communities that we serve.

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 definition of affordable housing would be relaxed to include middle-income housing in high cost areas, The proposal would lessen the public accountability of banks by not accurately measuring its responsiveness to local needs.

The history of red-lining communities has left a stain on our community, and we see these changes to CRA providing the same negative effects on the health and well-being of our community -- further degrading the revitalization opportunities.

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.

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