

**From:** Beth Harber [REDACTED]  
**Sent:** Wednesday, April 08, 2020 4:59 PM  
**To:** cra.reg@occtreas.gov; Comments  
**Subject:** [EXTERNAL MESSAGE] OCC-2018-0008 and RIN 3064-AF22

To Whom it May Concern,

I have worked in the community development field in Baltimore, Maryland for 30 years and I am appalled at the proposed changes to the Community Reinvestment Act proposed by the Federal Deposit Insurance Corporation and the Office of the Comptroller of the Currency.

Expanding the definition of small business to include businesses with \$2 million in annual revenue will divert lending away from our small and main street businesses which make up the majority of businesses in Baltimore.

Bank branches in low income neighborhoods are already difficult to find. The proposed rule would dis-incentivize banks from keeping these remaining branches open or opening new ones.

The development of a list of qualified activities, including stadiums and hospitals, does not hold banks accountable for meeting needs identified by community groups and nonprofit organizations.

Affordable housing financed by banks under CRA needs to serve low income households. Changing verification procedures would allow loopholes for non-low-income households to benefit.

I have not found a single provision in the proposed changes that I agree with and support. I urge you to reject all these proposed changes and instead to proposes that will strengthen the ability of the CRA to bring maximum opportunity to low income households and neighborhoods and especially, low income people of color.

Sincerely,

Beth Harber  
[REDACTED]  
Baltimore, Maryland [REDACTED]