

Message

From: Rob English [rob.english@metro-iaf.org]
Sent: 8/5/2022 5:42:30 PM
To: Comments [comments@fdic.gov]
CC: Rob English [rob.english@metro-iaf.org]
Subject: [EXTERNAL MESSAGE] RIN3064-AF81



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August 5, 2022

To Whom it May Concern:

The Metro Industrial Areas Foundation (Metro IAF) appreciates the opportunity to comment on the Notice of Proposed Rulemaking (NPR) regarding updating the Community Reinvestment Act (CRA.)

Affiliated with the Industrial Areas Foundation, the oldest and largest citizen power organization in the country, Metro IAF is comprised of 17 non-partisan, not-for-profit organizations located in the Mid-Atlantic, Midwestern, Northeastern, and Southeastern sections of the United States. Over the past 30 years, we have built over 6,500 owner occupied homes called Nehemiah sold to first time homebuyers in New York City, Baltimore, Chicago and other communities transforming entire blighted neighborhoods; created \$2 billion in wealth for black and brown working class families; and helped a generation of children thrive. Foreclosure rates on Nehemiah homes is less than 1%. Metro IAF has also built and helped finance more than 33,000 affordable rental apartments, benefiting mostly people of color. Metro IAF's organizing has delivered \$3 billion in dedicated local and state financing for affordable housing as well as preserved and improved 26,000 units from gentrification and slum landlords.

This work would have not been successful without Metro IAF and its affiliates raising \$40 million in 0 to 2% seed and construction, non-recourse financing from religious investors to support our development efforts.

Transforming blighted communities and repairing long-standing inequality and disinvestment requires consistent, long-term, patient capital. Current CRA regulations, however, do not offer sufficient incentives to ensure sufficient liquidity and access to capital within our communities and do not prioritize transforming blighted communities. Although Metro IAF has been able to raise non-recourse funds through mission based investors, we receive very limited support from financial institutions.

In order to raise the capital needed to rebuild blighted communities and address the desperate shortage of millions of affordable homeownership and rental units across the country, it is crucial that CRA be updated to reward financial institutions for:

- Making non-recourse, 15-year investments to support efforts like Metro IAF and other entities to rebuild blighted communities across the country.
- Investing in clearly defined LMI census tracts that are part of a comprehensive community redevelopment plan- especially single-family and non-LIHTC projects.
- Supporting projects that are part of the local municipality's community reinvestments to reverse or correct impacts of redlining and disinvestment.

On behalf of Metro IAF, we greatly appreciate your consideration.

Sincerely,

Martin Trimble

Director, Metro IAF