



CALIFORNIA REINVESTMENT COALITION

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The Honorable Joseph Otting
Comptroller of the Currency
Office of the Comptroller of the Currency

The Honorable Jelena McWilliams,
Chairman
Federal Deposit Insurance Corporation

Re: Request to end, suspend CRA rulemaking
Docket ID OCC-2018-0008 and RIN 3064-AF22.

Dear Comptroller Otting and Chair McWilliams,

We, the undersigned organizations and individuals, request that your agencies immediately end rule making efforts relating to the Community Reinvestment Act (CRA), with its comment period scheduled to close on April 8, 2020. At the least, we urge you to suspend such efforts during the current COVID-19 pandemic.

This request follows similar requests for suspension from various community organizations, Congressional leaders, and industry groups.

We believe that the OCC and the FDIC, as with all levers of the federal government, should focus resources on responding appropriately to the current health emergency gripping the nation.

This has no doubt been the reaction of most community organizations throughout California and throughout the nation. Our efforts are focused on responding to the current crisis and the huge economic and health impacts it is having and will continue to have on our communities. Family members and friends, clients and constituents, are worried about remaining healthy, paying rent, making mortgage payments, having a job to report to, keeping a small business open, and ensuring there is food on the table.



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As such, community organizations that would otherwise participate in the current rule making process by submitting comments, may be prevented from evaluating and commenting on every problematic aspect of the proposed rule. This is especially problematic in that the proposed rule is complex and will change a regulatory scheme that has been in place for some time. In addition, public comments submitted by April 8, 2020 will not at all reflect the unknown low and moderate income community needs of a new post COVID-19 America. Accordingly, the public record on which you will be basing your decisions will be incomplete and inadequate.

The idea that the agencies would consider pressing forward with this CRA rule making is all the more distressing given our collective analysis that the proposed rule will weaken this critical civil rights law, and result in LESS reinvestment in communities and LESS accountability for banks at a time when the vulnerable neighborhoods meant to be protected by the CRA are at great risk of being disproportionately harmed by the current crisis.

Once we come out of this crisis, we will need a stronger CRA to urge banks to be partners in creating and preserving stable homeownership and affordable housing opportunities; building small businesses that support entrepreneurs, hire locally and serve their communities; providing bank account and other products that help consumers build wealth while avoiding predatory lenders; and fighting discrimination and displacement. The current proposal will frustrate these goals.

As such, we urge you to end your plans for reform to the CRA. In the alternative, we urge you to suspend CRA rule making efforts.

If you have any questions about this request, please feel free to contact Kevin Stein at California Reinvestment Coalition at kstein@calreinvest.org.

Thank you for your consideration of our views.

Very Truly Yours



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Able Works
Abundant Housing LA
Alain McLaughlin Photography Inc
Anti-Eviction Mapping Project
Bankers Small Business CDC of California
Bay Area Solidarity
Bet Tzedek
Beverly and Vermont Community Land Trust
CAARMA
California Capital Financial Development Corporation
California Coalition for Rural Housing
California Community Land Trust Network
California Housing Partnership
California Low-Income Consumer Coalition
California Progressive Alliance
California Public Banking Alliance
California Reinvestment Coalition
CAMEO- California Association for Micro Enterprise
Opportunity
CCEDA
CDC Small Business Finance
Center for California Homeowner Assoc Law
Central Valley Realist Board
Chinatown Community Development Center
City Heights Community Development Corp
City Ministry Network
City of Livingston
Coachella Valley Housing Coalition
Coalition for Economic Survival (CES)
Coalition for Humane Immigrant Rights (CHIRLA)
Community Economic Justice Unit at East Bay
Community Law Center
Community Housing Opportunity Corporation
Community HousingWorks
Community Vision Capital & Consulting
Congregations Organized for Prophetic Engagement
Consumer Federation of California
Consumers for Auto Reliability and Safety
Crenshaw Subway Coalition
CRSP
East Bay Housing Organizations
El Pajaro Community Development Corporation
FACES|Family Assessment Counseling & Edu
Fair Housing Advocates of Northern California
Fair Housing Council of the San Fernando Valley
Fair Now
Faith and Community Empowerment
Fresno CDFI
Greenlining Institute
Housing California
Housing Equality & Advocacy Resource Team
HousingNow
Housing Rights Committee of San Francisco
HPP CARES
Inquilinos Unidos
LA Forward
Legal Aid Foundation of Los Angeles
Low-Income Self-Help Center
Lynroc Tenant Association , Rocklin Ca. 95677
Main Street Launch
Merritt Community Capital Corporation
Mission Economic Development Agency
Multicultural Real Estate Alliance for Urban Change
MyPath
National CAPACD
National Fair Housing Alliance
Neighborhood Housing Services of Los Angeles
County
Northern California Land Trust
One Redwood City
Opportunity Fund
Partnership for Working Families
PolicyLink
Public Counsel
Public Good Law Center
Public Law Center
Reigniting Empowered Expressiveness & Motivation
Reinvent South Stockton Coalition
Renaissance Entrepreneurship Center
Sacramento Housing Alliance
SAJE (Strategic Actions for a Just Economy)
Santa Ana Early Learning Initiative
Self-Help Enterprises
Self-Help Federal Credit Union
Service Employees International Union
SF Council of Community Housing Organizations
SFMade
South Bay Progressive Alliance
Southern California Association of NonProfit
Housing (SCANPH)



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Strategic Actions for a Just Economy (SAJE)
Tenderloin Neighborhood Development Corporation (TNDC)
The Central Valley Urban Institute
The Kennedy Commission
The Public Interest Law Project
The Unity Council
UC Student Workers' Union—UAW 2865
Ventura County Community Development
Vermont Slauson EDC
VIP Best Insurance Agency
Women Organizing Resources, Knowledge and Services (WORKS)
Women's Economic Ventures
Working Solutions
Youth Finance Institute of America

Individuals

Monica Montgomery, San Diego City Councilmember, Co-Chair, San Diego City County
Reinvestment Task Force
Nathan Fletcher, San Diego County Board of Supervisors, Co-Chair, San Diego City County
Reinvestment Task Force
Maria Benjamin, SF MOHCD
William Pavao, Executive Director Emeritus, TCAC
Caitlin Sanford, Former financial regulator, California Department of Business Oversight
Rosa Guerrero Contreras
Robert Kane
Timothy Killikelly
Patricia Krackov
Denzel McCollum, Jr.
Angella McQueen
Sarah Ringler
Robert Foster Thompson