

From: Metropolitan St. Louis Equal Housing Opportunity Council, Mira Tanna
Subject: Community Reinvestment Act

Comments:

To the Federal Reserve Board:

I am writing to offer public comment on proposed addition to the statutory regulations of the Community Reinvestment Act. As a fair housing organization, we are concerned about banks' investments in low-income and minority communities. I am concerned about the proposal to provide favorable consideration outside of assessment areas for banks' financing of low-income credit unions and minority and women owned financial institutions. Our organization has looked at the compliance with fair lending laws and CRA of banks that operate in the local St. Louis area. We can evaluate community development work that banks do within our assessment area, but when banks choose to finance organizations far removed from our metropolitan area and seek credit under CRA for this assessment area, we, as a local organization, have limited means of evaluating these investments. I urge you to only consider such investments if the institutions have met needs in their assessment area first. I also believe that if the regulatory agencies should conduct an analysis of the impacts of the new Q&A regarding low-income credit unions and minority and women owned financial institutions before codifying this Q&A in CRA regulation. Should this research reveal that the beneficiaries are disproportionately white middle and upper income communities, the language should be modified to focus on low income and minority borrowers and communities.

Thank you.

Sincerely,

Mira Tanna
Metropolitan St. Louis Equal Housing Opportunity Council