



Washington, DC  
 Community of  
 Reinvestment  
 Association

▶ Susan M. Brown  
 President

▶ Patricia Chasica  
 Vice President

▶ Gary L. Murphy  
 Assistant Vice President

▶ Members

- Ed Security Bank of Washington
- AmericanWest Bank
- Archon Bank
- Bank of America
- Bank of the Pacific
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- Boston Private Bank
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- Guinness Bank
- The Commerce Bank of Washington, DC
- First West Bank
- First Federal Bank of Long Association of Los Angeles
- First Savings Bank of Denver
- Firststar Bank
- Foundation Bank
- Heritage Bank
- HomeLife Bank
- JP Morgan Chase Bank
- Key Bank
- North Carolina Bank and Trust
- Northwest Trust Bank
- Phynia Federal Savings & Loan Association
- Qwest Bank
- Royal Financial Bank
- Shelburne Community Bank
- South Bank
- South State Bank
- Meridian Bank
- Sambor Bank
- Seaport Bank
- Udon Bank
- Washington Bank of
- Washington Trust Bank
- White Eagle Bank
- West Coast Bank
- Whitely Local Bank
- Volterra Federal Savings & Loan Association

May 14, 2013

Legislative and Regulatory Activities Division  
 Office of the Comptroller of the Currency  
 Docket ID OCC-2013-0003  
[Regs.comments@occ.treas.gov](mailto:Regs.comments@occ.treas.gov)

Robert deV. Frierson, Secretary  
 Board of Governors of the Federal Reserve System  
 Docket No. OP-1456  
[Regs.comments@federalreserve.gov](mailto:Regs.comments@federalreserve.gov)

Robert E. Feldman, Executive Secretary  
[comments@fdic.gov](mailto:comments@fdic.gov)

Gentlemen:

The Washington Community Reinvestment Association is a non-profit, multi-bank statewide lending consortium that provides permanent loans on affordable multi-family rental housing throughout Washington. Our properties target residents who earn less than 60% of the area median income and the Community Reinvestment Act has caused continued bank support to our organization and a willingness to grow the fund to well in excess of \$130 million so we can continue this much needed work. Our banks are both the large national banks and the small community banks which has aided us in providing capital and mitigating risk in many of the underserved areas of the State.

I appreciate the opportunity to comment on your proposed revisions to the “Interagency Questions and Answers Regarding Community Reinvestment”.

We strongly support your effort in the revisions to increase the flow of private capital to underserved areas by appropriately recognizing the value and impact of Community Development activities within the Community Reinvestment Act (“CRA”) evaluations and that the banks should receive full CRA credit for the amount of their investments in funds like ours.

We prefer the continuation of the pro-rata system whereby banks receive CRA credit equal to the share of their investments which has worked

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successfully for years and we urge you to finalize the revisions as soon as possible.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan M. Duren". The signature is written in a cursive, flowing style with a large initial "S".

Susan M. Duren  
President