



Washington
Community
Reinvestment
Association

▶ Susan M. Duren
President

▶ Dulcie J. Claassen
Vice President

▶ Gary L. Murphy
Assistant Vice President

▶ Members

1st Security Bank of Washington
AmericanWest Bank
Anchor Bank
Bank of America
Bank of the Pacific
Bank of the West
Banner Bank
Boston Private Bank
Cashmere Valley Bank
Cathay Bank
Columbia Bank
The Commerce Bank of
Washington, N.A.
East West Bank
First Federal Savings & Loan
Association of Port Angeles
First Savings Bank Northwest
Fortune Bank
Foundation Bank
Heritage Bank
HomeStreet Bank
JP Morgan Chase, N.A.
Key Bank
North Cascades National Bank
Northern Trust Bank
Olympia Federal Savings
& Loan Association
Opus Bank
Regal Financial Bank
Riverview Community Bank
Seattle Bank
Skagit State Bank
Sterling Bank
Timberland Bank
Umpqua Bank
Union Bank
Washington Federal
Washington Trust Bank
Wells Fargo Bank
West Coast Bank
Whidbey Island Bank
Yakima 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

Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
Docket No. OP-1456
Regs.comments@federalreserve.gov

Robert E. Feldman, Executive Secretary
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

1200 Fifth Avenue Suite 1406 Seattle, Washington 98101
P. O. Box 2609 Seattle, Washington 98111-2609
(206) 292-2922 (800) 788-6508 FAX (206) 292-0782
www.wcra.net

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

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan M. Duren".

Susan M. Duren
President