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# Community Reinvestment Act (CRA) Community Guidebook

Rebuild by Design  
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# Introduction

## What is the Community Reinvestment Act (CRA)?

The Community Reinvestment Act (CRA) is a 1977 federal law that encourages banks to meet the credit needs of the entire community, particularly low- and moderate-income (LMI) neighborhoods, to combat redlining.

## Why was this guide created?

The Community Reinvestment Act (CRA) has long supported affordable housing, small businesses, and community development, but its potential for addressing climate challenges is underused. By leveraging CRA for multi-benefit infrastructure projects, communities can build resilience to floods, heat, and storms while also advancing affordable housing, transit, and healthier neighborhoods.

## Who is it for?

This guide is intended for **community-based organizations** – affordable housing groups, community land trusts, and climate nonprofits who are working to build resilience in low- to moderate-income neighborhoods. It equips you with the knowledge to engage banks and regulators to support community-wide climate investments.

## Where should you begin?

Are you familiar with the CRA?

→ [Skip to page X](#) where we will...copy TK

Have you not heard about the CRA?

→ [Start with pages X-#](#) to get some important context and then get started...copy TK

## What to know before reading?

Before diving in, it's helpful to understand a few key terms that appear throughout this guide. These words and phrases are the building blocks of how we talk about the CRA and its potential for advancing climate resilience. We've defined them here for quick reference, and you'll also see them explained in more detail in later sections of the guide.

- **CRA:** Community Reinvestment Act
- **CRA-eligible tract:** Low- or moderate-income areas, designated disaster areas, or underserved or distressed nonmetropolitan middle income geographies
- **LMI communities:** Low- and moderate-income
- **CBO:** Community-based organization
- **Community-wide climate infrastructure:** Physical and social spaces that support community well-being in times of climate disaster.
- **Performance Context:** The economic, demographic, and community factors that regulators who evaluate a bank's performance take into account during a CRA exam.
- **CDFI:** Community Development Financial Institutions

# A Call for Climate Resilient Communities

Climate disasters such as heat waves, flooding, wildfires, and stronger hurricanes are intensifying nationwide, affecting cities, suburbs, and rural areas while disproportionately impacting low-income and communities of color. And communities already have ideas and plans to adapt and lessen the impact of climate disasters, but they need investment.



Image: Rebuild by Design

Across the U.S., communities are facing more frequent climate disasters.

**Between 2011 and 2024:**

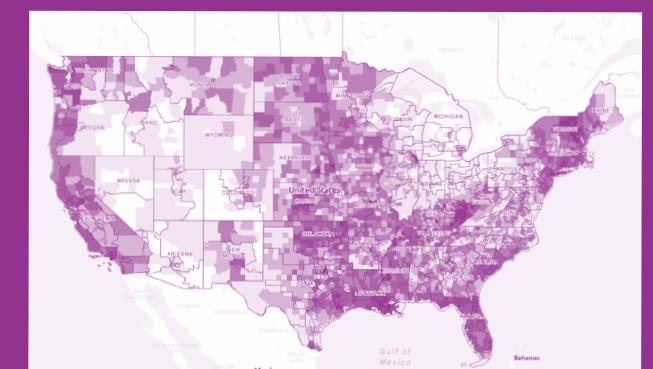
**99.5% of congressional districts**

experienced at least one federally declared major disaster due to extreme weather, affecting communities across political, urban-rural, and socioeconomic lines.

**80% of states**  
had 10 or more disasters.

**\$117.9 billion**

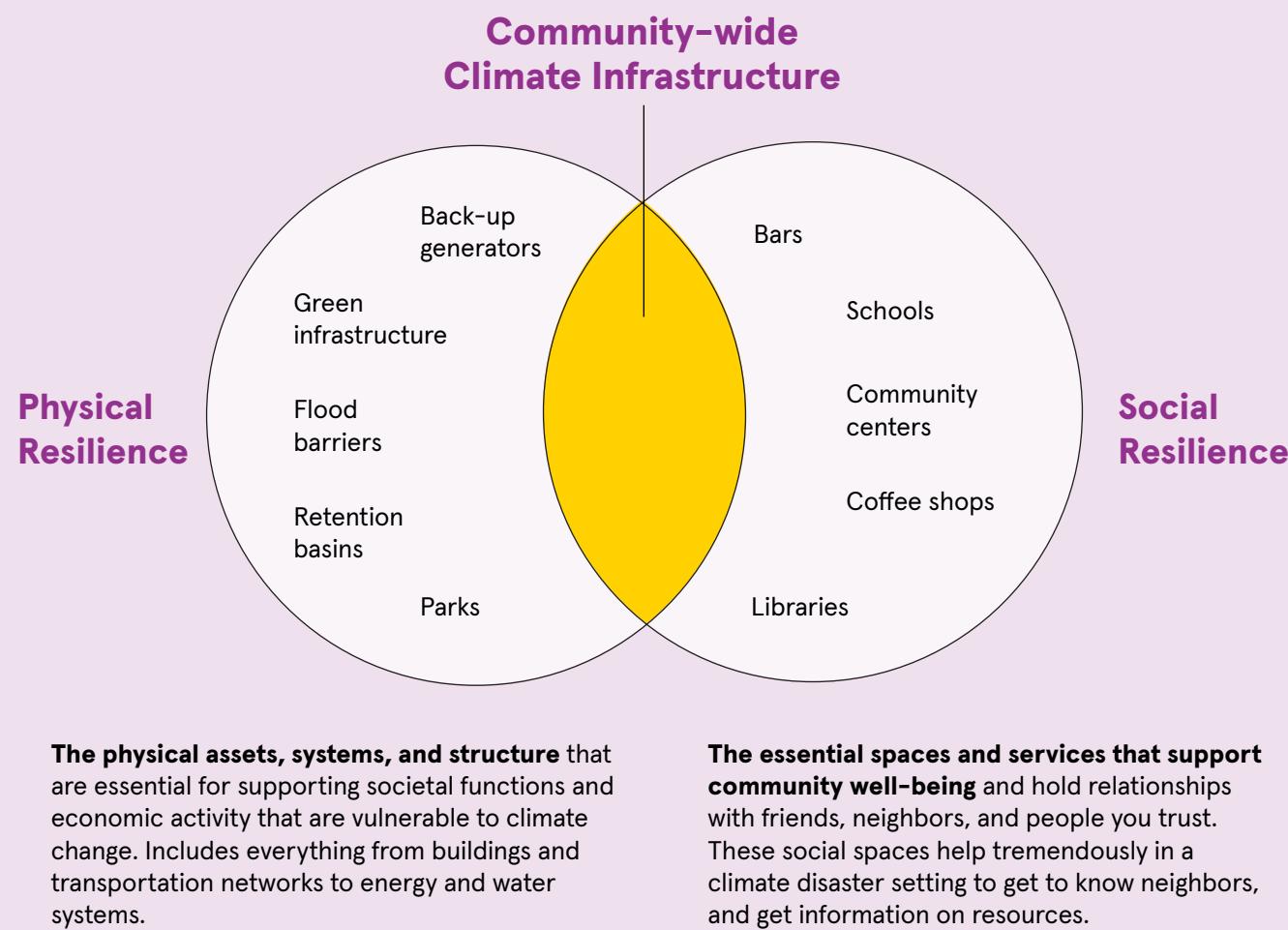
of tax dollars was spent in federal relief after major disasters.



To learn more, explore the [Atlas of Accountability](#), created by Rebuild by Design to map federal major disaster declarations and federal post-disaster assistance obligations. Data is at the US county level and congressional districts.

# A Call for Climate Resilient Communities

Communities across the country have ideas, plans, and goals about how to address the impact of climate change by using the spaces and relationships we already have to take care of people. Community-wide climate infrastructure combines physical spaces with social networks and relationships to help communities prepare for, respond to, and recover from climate-related events.



## Examples of Community-wide Climate Infrastructure

While CRA has historically funded affordable housing and small business development, there is a growing opportunity for it to support large-scale, multi-benefit infrastructure that addresses both climate risk and community needs. The examples below, though not CRA-funded, show how resilience projects can safeguard assets, strengthen neighborhoods, and deliver lasting social, economic, and environmental benefits, when there is the investment to do so.



NYC Department of Environmental Protection (DEP)

### Cloudburst Management New York City (NY)

In New York City, the **Cloudburst Project** targets four flood-prone neighborhoods across the city. The infrastructure combines green (natural) and grey (engineered) infrastructure during extreme rain events to prevent flooding. An essential aspect of this approach is community collaboration, especially in vulnerable, often LMI neighborhoods that are most at risk due to old infrastructure and denser communities.

This rendering highlights a New York City Housing Authority (NYCHA) a sunken basketball courtyard with seating, stairs, and a sloped walkway that store water and work double duty as a public space and flood protection. Such strengthening of infrastructure and disaster resilience provides potential opportunities for CRA credit, as cloudburst management contributes to long-term community stability.



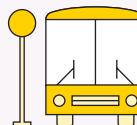
### SAFER Bay Project San Francisco (CA)

**SAFER Bay Project**, a multi-benefit infrastructure initiative in California which, while not funded through CRA, offers a compelling example of what's possible. Designed to reduce chronic flooding in an area containing both high-profile corporate headquarters, such as Google, Facebook, and Hewlett-Packard, as well as vulnerable residential LMI areas, the project integrates engineered levees with tidal marsh restoration and nature-based solutions. It protects not only critical infrastructure like power substations and water pipelines but also enhances public access to parks and trails and restores critical habitat through nature-based solutions. If adapted to meet CRA criteria, such as serving or benefiting LMI geographies, projects like SAFER Bay could qualify for CRA credit and mitigate flooding, safeguarding communities and assets while helping banks reduce regional exposure to extreme weather risk.

# Principles for Resilient Communities

The following principles were developed from conversations with communities on what they would like to see investment towards in their neighborhoods. You can use CRA towards your priorities for building community climate resilience. Each theme is tied to the physical and social assets that support communities. Use these principles to guide team conversations, coalition meetings, or other visionary spaces.

These principles were created from two workshops **Rebuild by Design** and **Redress Movement** held in Denver, CO, and Charlotte, NC, to learn with local residents about climate impacts and community-wide climate infrastructure desired in each city.



## Accessible Transportation

Ensure safe, affordable, and climate-resilient transportation options that connect all communities equitably and function effectively in times of crisis.

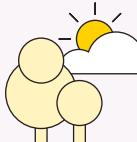
**Examples:** Improved public transportation, crisis-ready transit, bus, bike and pedestrian infrastructure



## Affordable and Inclusive Housing

Invest in dignified, mixed-use housing that remains affordable for current residents in low climate risk areas and integrates essential services without triggering displacement.

**Examples:** Affordable housing near transit and amenities, at prices affordable to current residents



## Green Space and Environment

Create and maintain accessible, equitable green spaces that promote public health, mitigate climate risks, and resist gentrification.

**Examples:** Maintained parks, community gardens, fire buffer zones



## Community Services and Social Infrastructure

Equip everyday social spaces to serve as multi-use, intergenerational community infrastructure that provide essential services, build social cohesion, and support vulnerable populations year-round and during times of climate crisis.

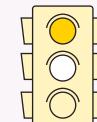
**Examples:** Community centers, cold weather and crisis shelters, shared resources



## Public Spaces and Amenities

Deliver well-maintained, accessible public spaces that enhance health, dignity, and daily quality of life.

**Examples:** Workout stations, public restrooms



## Walkable, Dense, Mixed-Use Spaces

Promote neighborhood design that integrates homes, jobs, services, and recreation—so residents can live, work, and play without leaving their community.

**Examples:** Live, work, play spaces, safe streets and sidewalks



## Cultural Diversity and Inclusion

Celebrate and support the cultural richness of the community through inclusive planning, economic opportunities, and culturally responsive resources.

**Examples:** Cultural hubs, ethnic markets



## Flooding Infrastructure

Embrace water as part of the landscape and culture—designing infrastructure that works with nature to reduce flooding and enhance public space.

**Examples:** Green and stormwater infrastructure, parks and playgrounds that hold rainwater



## Development without Displacement

Ensure that investments in housing, transit, and amenities are rooted in community control and designed to uplift existing residents—so neighborhoods thrive without pushing people out.

**Examples:** Affordable housing, grocery stores, libraries and schools

# Understanding the Community Reinvestment Act (CRA)

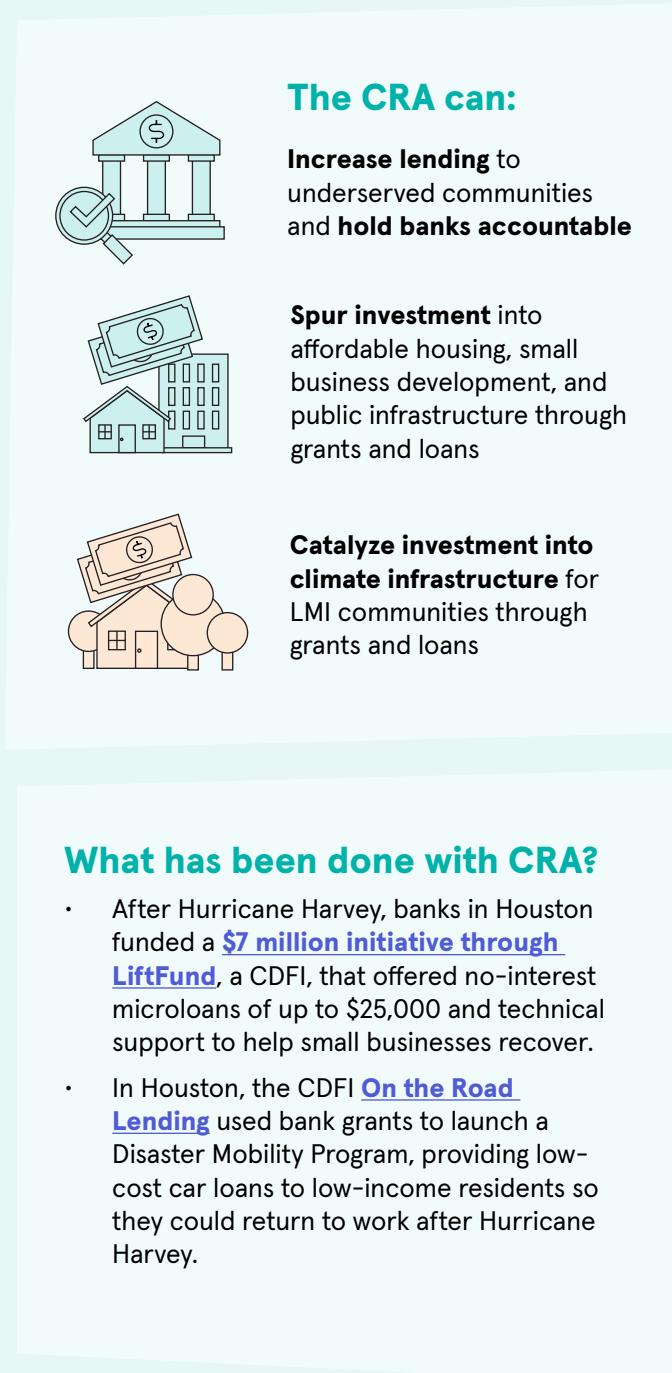


Image: Rebuild by Design/The BIG Team

# History of CRA

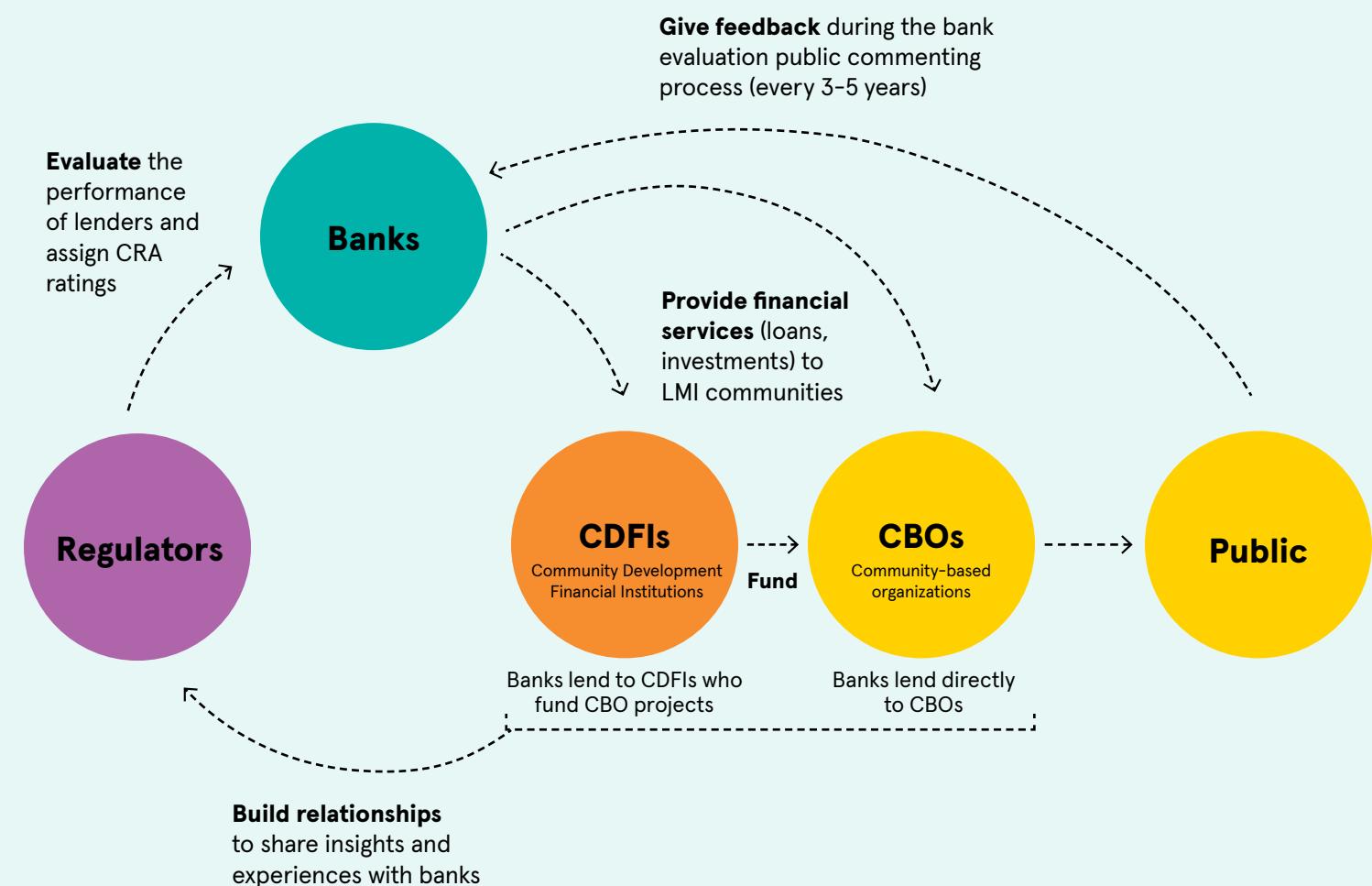
The CRA was enacted in 1977 to end **redlining**, the discriminatory practice of denying or limiting financial services, particularly loans and insurance, to residents of specific neighborhoods based on their race or ethnicity.

In response, the CRA requires banks to support the communities where they operate, particularly low- to moderate-income (LMI) areas.



# How does the CRA work?

**The CRA establishes a framework for collaboration** among banks, regulators, and communities to ensure equitable access to investment for LMI communities through evaluations, public input, and partnerships.



# Who are the stakeholders?

<b>Regulatory Agencies</b>	<b>Examples</b> <ul style="list-style-type: none"> <li>Federal Reserve Board (FRB)</li> <li>Office of the Comptroller of the Currency (OCC)</li> <li>Federal Deposit Insurance Corporation (FDIC)</li> </ul> <b>Roles and Responsibilities</b> <ul style="list-style-type: none"> <li>Examine and rate banks on CRA performance, publishing results for accountability</li> <li>Set and update CRA regulations, including modernization efforts</li> <li>Enforce fair lending laws and address discrimination</li> <li>Review mergers and expansions, considering CRA performance and public input</li> </ul>
<b>Banks</b>	<b>Examples</b> <ul style="list-style-type: none"> <li>Depository institutions like commercial banks and savings associations</li> </ul> <b>Roles and Responsibilities</b> <ul style="list-style-type: none"> <li>Offer loans, investments, and services to CRA-eligible communities</li> <li>Partner with CDFIs and community groups to meet CRA goals</li> <li>Track, document, and report CRA activities and outcomes</li> <li>Engage communities and respond to CRA exams and public input</li> </ul>
<b>Community Development Financial Institutions (CDFIs)</b>	<b>Examples</b> <ul style="list-style-type: none"> <li>Nonprofit loan funds, credit unions, banks, and venture funds certified by the U.S. Treasury to provide affordable, mission-driven capital in underserved areas.</li> </ul> <b>Roles and Responsibilities</b> <ul style="list-style-type: none"> <li>Invest in high-impact projects banks often avoid, serving underserved communities</li> <li>Partner with banks for CRA-eligible investments, grants, and loans</li> <li>Amplify community voices and represent needs in CRA planning</li> <li>Facilitate bank-community partnerships and provide feedback on CRA performance or mergers</li> </ul>



## Public (Community Organizations & Advocates)

Examples
Nonprofits
CBOs
Housing and climate justice groups
Advocacy coalitions
Residents and neighborhood associations

Roles and Responsibilities
<input type="checkbox"/> Advocate for your community by highlighting needs, gaps, and priorities
<input type="checkbox"/> Comment on CRA exams and merger applications
<input type="checkbox"/> Collaborate with banks and CDFIs on community development projects
<input type="checkbox"/> Organize, educate, and promote equitable investment strategies

# How are banks held accountable?

**The CRA holds banks accountable for meeting the credit and investment needs of the communities where they operate, especially low- and moderate-income (LMI) neighborhoods.**

CRA evaluations matter because they directly influence how banks are rated and whether they can expand and merge. For communities, understanding the process is key. This is when communities (you!) have an opportunity to provide input, highlight local needs, and hold banks to their commitments.

## How are banks evaluated?

Banks are evaluated by regulators, using public feedback to make sure they are meeting the requirements of lending to LMI communities. They are scored on a scale of **Outstanding, Satisfactory, Needs to Improve, Substantial Noncompliance**.



Look up your bank's evaluation schedule and lead regulator by using the [FDIC](#), [Federal Reserve](#), and [OCC Databases](#)

## How often are banks evaluated?

Every bank is evaluated based on size **every 3-5 years**. They can be evaluated during a CRA evaluation, merger, acquisition, and expansion request.

## Who is responsible for evaluating banks?

There are three regulators who are responsible for evaluating banks.

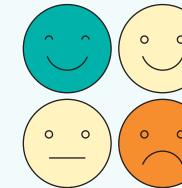
<b>OCC</b> (The Office of the Comptroller of the Currency)	Examines national banks and federal savings associations.
<b>FRB</b> (Federal Reserve Board)	Examines state-chartered banks that are members of the Federal Reserve System.
<b>FDIC</b> (Federal Deposit Insurance Corporation)	Regulates and examines state-chartered banks that are NOT members of the Federal Reserve System, and state-chartered savings associations.

# What's the evaluation process?



## 1. Define Assessment Areas

Banks identify geographic regions where they conduct most of their business (such as where branches, ATMs, and deposit-taking operations are located). These areas are called “**assessment areas**.”



## 6. CRA Rating Assignment

Based on the evaluation, the bank receives one of four CRA ratings: **Outstanding, Satisfactory, Needs to Improve, or Substantial Noncompliance.**



## 7. Public Disclosure + Community Input and Engagement

Results of the CRA evaluation are made publicly available.



## 2. Regulatory Oversight and Examination

Banks are examined by **FRB** (Federal Reserve Board), **OCC** (The Office of the Comptroller of the Currency), or **FDIC** (Federal Deposit Insurance Corporation) **every 3-5 years** depending on the size or nature of the bank.



## 3. Data Collection and Reporting

Banks collect data on their lending, investment, and service activities to **CRA- eligible tracts**. Banks submit these reports to the relevant regulatory agency.



## 4. CRA Performance Evaluation

- The regulatory agency conducts a CRA performance evaluation, assessing how well the bank meets the credit needs of its assessment areas based on three tests: **Lending test, investment test, and service test**.
- In order to accurately assess the extent to which banks are meeting the specific needs of the communities which they serve, **regulators research the performance context of each respective geographic service area**.
- Performance context is evaluated using qualitative methods, such as interviews with community points of contact, community development activities, bank innovation, etc., and quantitative methods including but not limited to unemployment rates, homeownership rates, geographic characteristics, etc. Qualitative data gathering is a key time for CBOs to contribute to the comments unique to a specific bank.



## 5. Community Commenting and Engagement

- Community organizations, individuals, and stakeholders can review and provide feedback** on a bank's performance in serving the credit needs of CRA-eligible tracts through submitting public comments to regulatory agencies regarding the bank's performance.
- These public comments are considered in the evaluation and can influence the bank's CRA rating.



## 8. Incentives and Penalties

- Banks with a strong CRA performance (high ratings) are rewarded:** May be more easily approved for mergers, acquisitions, and branch expansions.
- Banks with poor CRA ratings may face penalties:** Denial of expansion plans or merger requests, or pressure to improve their services in CRA-eligible tracts before they can undertake certain activities.



## 9. Continuous Monitoring and Improvement

Banks are expected to continuously monitor their efforts to meet the credit needs of CRA-eligible tracts. They may adjust their strategies to better serve these areas.



## 10. Re-evaluation

After a period, the bank will undergo a new CRA evaluation by regulators. The process repeats, ensuring ongoing oversight and improvement in how banks meet community needs.

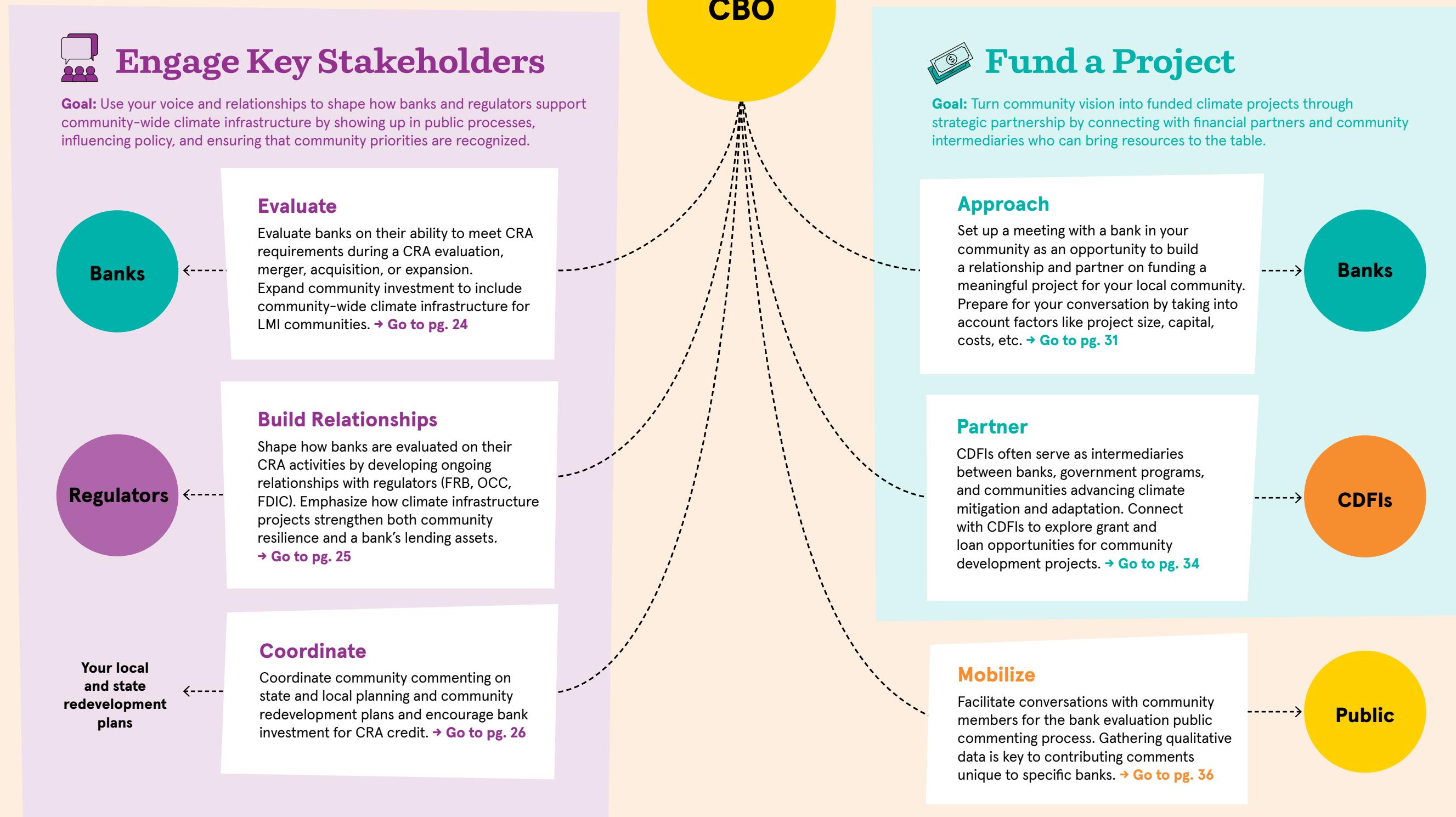
# Take Action! Leveraging the CRA for Climate Infrastructure



Image: Rebuild by Design/The BIG Team

The **Community Reinvestment Act (CRA)** has long been a tool for channeling investment into affordable housing, small businesses, and community development projects—but its potential to address today’s climate challenges remains underutilized. As climate risks intensify, the CRA can and should be leveraged for large-scale, multi-benefit infrastructure projects that not only strengthen resilience to floods, heat, and storms, but also deliver co-benefits like affordable housing, improved transit, and healthier neighborhoods. By broadening how we advocate for CRA dollars, communities can unlock new pathways for equitable, climate-smart investment that supports both immediate needs and long-term resilience.

# What Can Community-based Organizations Do?



# Step-by-Step Guide

Image: Rebuild by Design



## 1. Identify Your Community's Tract

Every neighborhood is part of a census tract, which determines CRA eligibility and how banks are meeting local community needs. Finding your tract is the first step to knowing if your community qualifies for CRA investment. Use the [FFIEC Geocoding Search](#) to see if your community qualifies as a CRA- eligible tract.

## 2. Understand How CRA Can Support Your Community

The CRA can be a powerful tool to channel investment into the services, infrastructure, and businesses that matter most for communities. By showing how projects align with CRA's goals of revitalization, stabilization, and low-to-moderate (LMI) community support, you can direct resources toward climate preparedness.

### How can CRA support my community?

- Increase access to affordable credit and basic banking services
- Direct capital toward climate-resilient infrastructure and housing
- Support local businesses and create jobs
- Strengthen public facilities, transportation, and green infrastructure
- Promote long-term, community-led development
- Improve financial accountability and transparency
- Stabilizing or improving economics that ensure municipal government finances stay sound

## 3. Collect Data on Your Community's Climate Risk

Data and stories are key to making the case for climate resilience under the CRA. Use tools like Rebuild by Design's [Atlas of Accountability](#) to identify risks such as flooding, heat, or storm damage in your community. Pair this with lived experiences and narratives from residents to make the issue real for banks and regulators. The stronger the evidence, the more compelling your case for investment.

## 4. Determine If Your Bank Meets Your Community's Needs

Banks are evaluated on how well they serve local needs—but they rely on communities to define those needs. Collect stories and data from your community about climate risks, services gaps, and opportunities for projects like retrofits, resiliency hubs, or green parks. Connect your advocacy to **performance contexts** examiners use (factors like housing, jobs, and infrastructure) to show where banks can both support community resilience and earn CRA credit.

**Performance Context:** the collection of economic, demographic, and community-specific information examiners use to understand the environment in which a bank's performance is evaluated.

## 5. Demonstrate Your Understanding of CRA Commitments

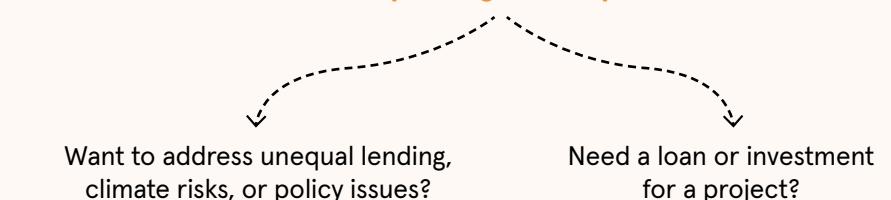
Banks are most responsive when communities know the rules they are held to. These are spelled out by regulators like the FDIC, OCC, and Federal Reserve, and they explicitly include revitalization, stabilization, and disaster preparedness. Citing these in conversations or public comments shows that you know the legal and regulatory obligations for banks.

## 6. Establish Your Goal & Choose Your Path (Engagement or Funding)

Clarify how you want to use the CRA for climate infrastructure. Are you seeking funding for a resilience project or raising awareness of climate risks? Clear goals help you choose the right strategy and measure success. Framing your goal around both community needs and CRA criteria increases the chances of moving a project forward.

There are two main ways to use CRA: **engaging with key stakeholders** and **funding a project**. Engagement focuses on building relationships with banks and regulators—through meetings, comments, or shaping redevelopment plans, while funding targets loans, partnerships with CDFIs, or bank-backed projects.

### Examples of goals and paths:



 **Engage Key Stakeholders**  
(pg. 24)

 **Fund a Project**  
(pg. 30)

The following pages outline these tracks, showing tools, steps, and project planning strategies to match your community's goals.



# Engage Key Stakeholders

## Learn About Engagement



### Evaluate Banks

**Goal:** Encourage investment in community-wide climate infrastructure during the CRA evaluation, merger, acquisition, and expansion commenting processes.

#### Step 1: Learn Your Bank's CRA Evaluation Schedule

Learn when your bank is getting a CRA evaluation, or when a merger, acquisition, or branch change is proposed.

Key schedules and bulletins to watch: Federal Reserve, Office of the Comptroller of the Currency, and Federal Deposit Insurance Corporation evaluations and bulletins.

**CRA Evaluations:**

- » [Federal Reserve Schedule](#)
- » [OCC Schedule](#)
- » [FDIC Schedule](#)

**Mergers, acquisitions, branch openings or relocations**

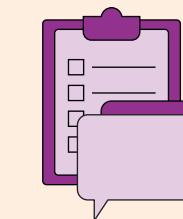
- » [Federal Reserve Bulletin](#)
- » [OCC Bulletin](#)
- » [FDIC Bulletin](#)

#### Step 2: Activate Community Input that Highlights Climate Infrastructure Opportunities

- **Coordinate** commenting with community members to identify common themes, solutions, and priority needs
- **Emphasize** high climate risks in CRA-eligible areas that threaten residents and bank stability.
  - » [Outline how weather-related disasters weaken banks' credit quality, stability, financial solvency, and profitability, and borrowers' finances.](#)
- **Collect** community stories, data on damages, restoration costs, and relocation to quantify risks.
- **Outline examples** of climate resiliency projects (e.g., sewer upgrades, levees, storm drains, energy-efficient equipment, resiliency hubs) and explain their benefits.
- **Connect** climate investments to housing, jobs, and other economic opportunities

#### Step 3: Submit Public Comments

- **Encourage** as many community members as possible to submit comments during the evaluation window—timing and volume increase impact.



### Build Relationships with Regulators

**Goal:** Shape how banks are evaluated on their CRA activities by building relationships with regulators.

#### Step 1: Reach out to Regulators and Highlight Climate Vulnerabilities

- Use data and community stories to show LMI neighborhoods' climate risks.
- Frame climate investments as essential for meeting credit needs and long-term community stability.

#### Step 2: Link to CRA Goals

- Reinforce CRA's commitment to revitalization and stabilization. Emphasize that climate-resiliency investments are essential to supporting this.
- Cite [interagency guidance](#) showing disaster recovery and resiliency investments qualify as revitalizing or stabilizing activities, especially for LMI areas.

#### Step 3: Provide Examples

- Demonstrate understanding of CRA-eligible climate projects.
- Reference project scale and past examples:
  - » [Houston, Hurricane Harvey:](#) Banks funded microloans and technical assistance through LiftFund.
  - » [Dallas, Hurricane Harvey:](#) On the Road Lending provided no interest vehicle loans up to \$25,000 through a \$7 million fund to help LMI residents return to work.
- Show how similar projects support community safety and qualify for CRA credit.

#### Step 4: Emphasize Investment Importance to both Banks and Communities

- Stress that investing in community-wide climate infrastructure protects both residents and banks.
- Highlight heightened risks in CRA-eligible tracts to make the case for action.



## Comment on Local or State Redevelopment Plans

**Goal:** Coordinate community commenting on state and local planning and community development plans and encourage bank investment for CRA credit.

### Step 1: Coordinate Community Input

- Organize community members to review and comment on local or state planning and development plans.
- Highlight disaster risks, gaps in infrastructure, and opportunities for resilience projects.
- Encourage banks to invest in projects that could earn CRA credit.

### Step 2: Look at Examples

- Look at past or current redevelopment [plans](#) to illustrate how resilient infrastructure and community needs can be integrated.

### Step 3: Find Opportunities to Comment

- Check websites of state and local planning or community development departments for plans open for public comment.
- Sign up for email updates when available.
- Key terms to watch for: **Master Plans, Renewal Plans, Community Plans, Development Reviews.**

Image: Rebuild by Design



## Successful Bank Engagement Stories

The following examples highlight successful strategies where community organizations, coalitions, and local stakeholders influenced bank practices, secured investments, and shaped lending priorities. These stories focus on engagement with banks and regulatory influence, and illustrate the potential impact of coordinated advocacy and the importance of community participation in CRA processes.

### [Flagstar & NYCB Merger, Renewed Commitment to Inclusive Lending \(\\$28 Billion\)](#)

\$28 billion Community Benefit Agreement (CBA) between New York Community Bancorp, Flagstar, and NCRC

- National Community Reinvestment Coalition (NCRC), Association for Neighborhood and Housing Development (ANHD), and local CBOs submitted comments opposing the merger unless a CBA was created
  - » Pressure via commenting allows banks to act before regulatory institutions can formally approve or deny merger applications.

### [JPMorgan Chase Racial Equity Commitment & Measuring Lending Gaps in Mortgage and Small Business Loans in Chicago's Communities \(\\$30 Billion\)](#)

- WBEZ investigation highlighted JPMorgan Chase's lending disparities between white-, black-, and latinx-majority neighborhoods
- Local CBOs pressured the OCC and Federal Reserve to examine Chase's CRA compliance closer during the next evaluation
- Chase voluntarily established a \$30 billion racial equity commitment in 2020 instead of waiting for regulatory repercussions

### [BBVA Compass Community Reinvestment Plan \(\\$10 Billion\)](#)

- Community stakeholders and residents voiced feedback to BBVA Compass
- BBVA committed to \$2.1B in LMI mortgages, \$6.2B to small businesses, \$1.8B in community development lending

### [U.S. Bancorp Community Benefits Plan \(\\$100 Billion\)](#)

- National Community Reinvestment Coalition (NCRC) and California Reinvestment Coalition (CRC) organized listening sessions with more than 200 community groups in a public hearing with regulators during a U.S. Bancorp acquisition
- U.S. Bancorp announced a \$100 billion, five-year community benefits plan developed in partnership with NCRC and CRC to build equitable access to capital for the communities they serve

## Does your state have a CRA law?

In addition to the federal CRA law, a few states have state-level CRA laws that are specific to the unique needs of each state.

**Connecticut, Illinois, Massachusetts, New York, Rhode Island, Washington, West Virginia, and DC** have state-level CRAs.



**New York** prioritizes affordable housing and economic development



**Massachusetts** prioritizes investment in economically underserved areas



**Illinois** prioritizes equitable credit access for marginalized groups – focusing on revitalization of minority-and-women-owned businesses



**DC** prioritizes affordable housing and financial inclusion in historically marginalized areas



**Connecticut** prioritizes community development loans and investment in underserved areas



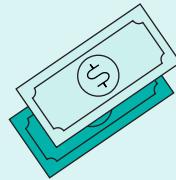
**Washington** prioritizes community partnerships and reinvestment in urban and rural areas



**Rhode Island** prioritizes small business lending and affordable housing development



**West Virginia** prioritizes rural community development and affordable housing



# Fund a Project



## Steps to Plan for Funding

**Goal:** Identify the resources, plan, and funding approach needed to successfully develop and implement your project, ensuring it serves CRA-eligible communities and addresses community resilience and climate needs.

### Identify the tools you need to complete your project.

- Funding from bank institution
- Technical assistance or expertise
- Type of funding based on project and financial capacity
  - » **Example:** a grant if the project will not turn profits, or a loan with a payback plan

### Identify the appropriate avenue to approach for funding.

- Approach a bank directly for funding and/or technical support. Complete the project independently.
- Approach a bank directly for funding and/or technical support. Hire an external partner for construction services required to complete the project.
- Approach a CDFI whose mission aligns with your goals for funding and/or technical support.
  - » See [Page 34](#) to learn about working with CDFIs

### Create an action plan.

- Who your organization is and why it is important in the community
- The challenge at hand demonstrated using community narratives, financial history, and climate data ([Rebuild by Design's Atlas of Disaster](#))
- What your project is, where it will be, and who it serves (specifically how CRA-eligible communities will be 'stabilized and revitalized')
- A project timeline
- What resources (grants, loans, technical support) you need
- The benefits of contributing to the project
- Any studies or proof that this project will succeed
- Examples from other communities, existing infrastructure projects, benefits of green energy, etc.

## Prepare for Approaching a Bank

**Goal:** Prepare your organization to present a clear, compelling case to a bank by outlining project scope, costs, capacity, community impact, and partnership needs, positioning the project as a meaningful opportunity to benefit CRA-eligible communities.

Whether you have an existing relationship with a bank or are looking to create a new one, talk to them about your project and be prepared to discuss the following details.

- Project size:** Is your organization looking to pursue a small, medium, or large-scale project?
- Technical expertise:** Does your organization require technical support?
- Project cost:** What is the estimated cost of your project?
- Organization history:** What is your organization's current and past importance in the community?
- Capacity:** What is your team's capacity to complete a project of this scale? What does the timeline look like?
- Revenue:** Do you have a source of revenue to repay a loan with?
- Partners:** Do you currently have, or are you planning to add, any partners to complete this project?
- Impact:** Who will the project affect? Will it directly impact CRA-eligible individuals?
- Community needs:** Does the project meet community needs? How do you know these are the needs?

## Translate Climate Language for Broader Understanding

Instead of....  
→ Try saying...

- Climate resilience project  
→ [Disaster mitigation infrastructure](#)
- Green retrofit  
→ [Energy efficient upgrades](#)
- Climate resiliency hub  
→ [Public safety center](#)
- Heat resilience  
→ [Cooling centers](#)
- Sustainable stormwater solution  
→ [Stormwater drainage for flood-prone zones](#)
- Climate-smart affordable housing  
→ [Affordable housing built to withstand natural disasters](#)
- Nature-based flood control  
→ [Flood infrastructure](#)

- Urban heat island mitigation  
→ [Tree canopy and shade installation](#)
- Net-zero buildings  
→ [Energy cost savings for housing](#)
- Sustainable communities  
→ [Revitalization of disinvested neighborhoods](#)
- Blue-green infrastructure  
→ [Drainage and public space improvement](#)
- Climate equity  
→ [Equitable access to essential public services](#)
- Resilient affordable housing  
→ [Weather-resistant affordable housing in high-risk areas](#)
- Climate resilience co-benefits  
→ [Multi-benefit public infrastructure for LMI communities](#)

## Project Scale

These examples of small-to large-scale projects is a way to think about how banks or CDFIs will understand the scale and level of investment your project needs. This information is not comprehensive, so once you know what project you have in mind, connect with the bank or CDFI you're thinking of partnering with to better understand how they might categorize your project and funding needs.



Image: Rebuild by Design/WB unabridged



### Small Scale

**Individual property/project**

~ \$2K – \$25K per unit

#### Good for:

LMI households and small businesses to reduce vulnerability to climate impacts.

#### Examples:

- Energy efficiency retrofits and weatherization  
[Funding Examples: Inclusive Prosperity Capital and Craft3](#)
- Solar installations for LMI homes  
[Funding Example: California's Self-Generation Incentive Program](#)

#### Beneficiaries:

- Individual households (specifically those in higher-risk LMI communities)
- Landlords, renters, homeowners

#### Funders:

- Federal/State Programs
- CDFIs
- Banks

#### CRA Relevance:

Banks can earn CRA credit by partnering with individuals or CDFIs to provide loans or grants for these resilient measures.

### Medium Scale

**Neighborhood or Community-Based Infrastructure**

~ \$250K – \$5M per project

#### Good for:

Climate-resilient public facilities that serve as hubs during emergencies and support long-term resilience.

#### Examples:

- Resiliency Hubs: Multi-use facilities for community gathering offering a range of services which can include shelter, charging stations, cooling, backup power, water, etc.  
[Example: Eastside Community Network's Stoudamire Resiliency Hub in Detroit](#)
- Green Schoolyards or Parks: Adapting these spaces for flood-mitigation and additional community support.  
[Example: PS 184M Shuang Wen School in Manhattan's Chinatown](#)

#### Beneficiaries:

- Neighborhoods and local communities
- Local organizations

#### Funders:

- Federal/State Programs
- Municipalities
- CDFIs
- Banks

#### CRA Relevance:

Banks can earn credit for financing projects that stabilize neighborhoods and promote disaster resilience.

### Large Scale

**Public-Private Partnerships (PPPs)**

~\$10M – \$1B+ per project

#### Good for:

Large scale infrastructure projects that protect existing infrastructure, facilities, homes, etc., from extreme weather/climate events.

#### Examples:

- Green Infrastructure Financing: Investment in stormwater management systems, energy microgrids, or coastal barriers.  
[Example: Philadelphia's Green City, Clean Waters](#)

#### Beneficiaries:

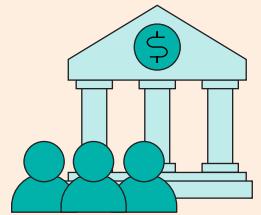
- Entire cities or regions
- LMI neighborhoods
- CRA-eligible tracts
- Private and public properties and enterprises

#### Funders:

- Federal and state governments
- Municipal bonds
- Private public partnerships (PPPs)
- Banks

#### CRA Relevance:

Banks can earn CRA credit if activities contribute to large-scale investments that support local development.



## Partner with a CDFI

**Goal:** Understanding CDFIs' roles in helping fund community and climate resilience projects

### Step 1: What is a CDFI?

- **Community Development Financial Institutions (CDFIs)** serve LMI communities and individuals without access to traditional banking.
- They include community development banks, credit unions, loan funds, and venture capital funds that provide loans, grants, or other financial support.
- CDFIs can act as intermediaries between banks or government programs and communities in need of climate mitigation and adaptation funding.

### Step 2: How CDFIs Can Fund Climate Infrastructure

- Finance clean energy and energy efficiency projects, like solar panels or energy-efficient upgrades.
- Invest in resilient infrastructure.
- Fund weatherization and building retrofits.

**Example:** ECLF and DC Green Bank funded Enterprise Community Development to install solar panels on affordable housing in D.C., generating 2,500+ MWh of renewable energy annually.

### Step 3: Find the Right CDFI

- Identify [nearby CDFIs](#) whose mission aligns with your organization.
- Look for funding programs or [award options](#) that match your project needs.

Image: Rebuild by Design/Cameron Blaylock



# Helpful Tips to Engage Banks and Regulators for Climate Resilience Using CRA

The CRA has specific commitments. When talking with banks and regulators, use these commitments to support your conversations.



Image: Rebuild by Design/Cameron Blaylock

## Know the CRA Commitments

### 1. CRA's core purpose aligns with climate resilience.

The CRA is designed to **“meet the credit needs of the communities in which [banks] are chartered, including low- and moderate-income neighborhoods,”** with the goal of revitalizing and stabilizing those areas. Climate resilience directly supports this mandate by protecting housing, businesses, and essential services.

### 2. Disaster preparedness and recovery are explicitly CRA-eligible.

Regulators (OCC, Board, and FDIC) consider activities that mitigate disaster risk in LMI areas—both **“pre-event plans”** and **“post-event efforts”**—as qualifying under CRA. This creates a clear pathway for banks to support proactive resilience projects.

### 3. Community-wide infrastructure is part of CRA's definition of revitalization and stabilization.

The CRA explicitly includes **“financing or other assistance for essential community-wide infrastructure, community services, and rebuilding needs”** as qualifying activities. This opens the door for investments in green infrastructure, microgrids, resilience hubs, and other multi-benefit projects.

### 4. Greater weight is given to activities most responsive to community needs.

Regulators have affirmed that **post-disaster and resilience activities will be prioritized when they respond directly to LMI needs.** Communities can make the case that climate infrastructure is essential to keeping residents safe, housed, and economically stable.

### 5. Climate risk is financial risk.

Flooding, fires, and extreme heat undermine the stability of homes, businesses, and local economies. **Investments in climate resilience reduce these risks for both residents and lenders,** aligning community protection with financial stability.

### 6. Local voices matter in defining eligible investments.

CRA requires banks to listen to community priorities. **Residents can explicitly identify climate resilience as a top need,** combining community narratives with data on climate risk and repair costs to demonstrate why investments are urgent and necessary.

- [Atlas of Disaster – Rebuild by Design](#)
- [CMRA – Climate Mapping For Resilience and Adaptation](#)  
An interactive tool that can show climate projections for your community up to 2044.

# Why Should We Act?

**So why should banks care?** Climate resilience is a win-win investment. Protecting vulnerable communities while reducing banks' own risks and improving returns. Risks underscores why climate resilience is not optional— a bank's financial health is tied to community stability. Rewards provides a strong business case— that resilience projects not only meet CRA criteria but also deliver ROI and systemic benefits.



Image: Rebuild by Design



## Risks of Investment

### Banks' assets are exposed to the same disasters as communities.

Flooding, hurricanes, and extreme weather reduce property values (banks' collateral) and weaken borrowers' credit.

### Climate disasters threaten financial stability.

They jeopardize borrowers' ability to repay loans and undermine overall bank stability.

### Physical risks extend beyond property.

Disasters disrupt supply chains, damage infrastructure, and reduce agricultural yields—directly affecting local economies and loan performance.

### LMI communities are disproportionately impacted.

- According to Keenan and Mattiuzzi's report [Climate Adaptation Investment and the Community Reinvestment Act](#), from 1998–2018, 57% of disaster-impacted counties have census tracts where banks may receive CRA credit.

### Vulnerability is shared.

Without resilience measures, both communities and banks remain vulnerable to cascading risks.



## Rewards of Investment

### Protects banks and communities alike.

Investing in resilience strengthens CRA-eligible neighborhoods and safeguards banks' loan portfolios.

### Financial returns.

The average ROI for climate adaptation investments is 27%, making resilience one of the most cost-effective forms of risk management.

### Reduces disaster costs.

Every \$1 spent on preparedness saves \$13 in damages, cleanup, and lost economic activity.

### Boosts local economies.

Resilience investments generate benefits like greater efficiency, productivity, higher incomes, and new investment opportunities.

### Supports CRA's mission.

Funding resilience projects in LMI neighborhoods directly fulfills CRA's mandate to "revitalize and stabilize" communities.

### Equity lens matters.

The real question isn't just "What has the best ROI?" but "Who benefits most?"—resilience investments ensure that vulnerable communities see lasting gains.

# Learn More

Extreme weather events are increasing due to climate change, and communities and banks are exposed. Funding community-wide resilient infrastructure projects through the CRA provides communities and banks with valuable opportunities to protect themselves and their assets.

With the knowledge in this guidebook, community-based organizations now have new tools to serve their communities through building new relationships and funding climate infrastructure projects using the CRA.



Image: Rebuild by Design/SCAPE Landscape Architecture

## Resources

This is a list of resources shared throughout the guidebook in addition to other important resources to learn more about the CRA, engaging banks and regulators, and funding a project.

### Additional/Important Resources

- [NCRC-CRA-Performance-Context.pdf](#)
- [HMDA Loans](#)
- [How to Conduct a Community Risk Assessment](#)
- [National Community Reinvestment Coalition \(NCRC\)](#)
- [CMRA - Climate Mapping For Resilience and Adaptation](#)

### CRA Evaluation Schedule

- [Federal Reserve Schedule](#)
- [OCC Schedule](#)
- [FDIC Schedule](#)
- [Federal Reserve Bulletin](#)
- [OCC Bulletin](#)
- [FDIC Bulletin](#)

### Other

- [FDIC's Consumer Compliance Examination Manual from 2016: Interagency Questions and Answers Regarding Community Reinvestment](#)
- [Community development under the CRA](#)
- [About CDFIs for Prospective Clients](#)



Image: Rebuild by Design

Created by: **Rebuild by Design** to help communities prepare for extreme weather and leverage the Community Reinvestment Act (CRA) for climate infrastructure investment

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