

DFS

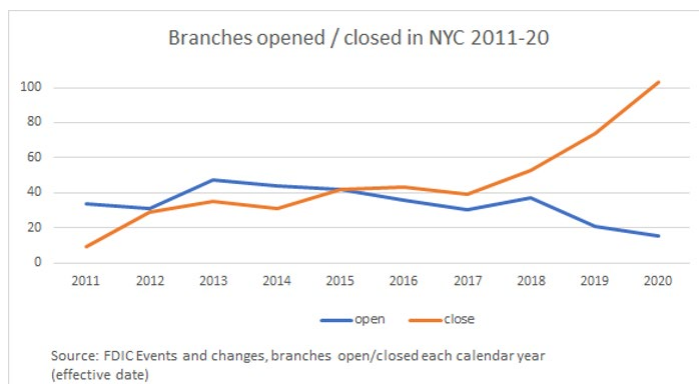
June 14, 2021

To Whom It May Concern:

I am writing on behalf of the Association for Neighborhood and Housing Development (ANHD) and our Equitable Reinvestment Coalition to oppose Ridgewood Bank's branch closures in the Bronx at 3445 Jerome Avenue and 3899 Sedgwick Avenue.

Branch closures have been on the rise for the last decade and [accelerating in recent years](#) nationwide. A similar trend is present here in New York City. From 2011 to 2020, the number of branch closures in the City has increased as openings declined nearly every year.

This pace of Bank closures accelerated rapidly in 2019 and into 2020 when COVID hit¹. **Over 100 branches closed in 2020 in New York City**, up from 74 in 2019 and 53 in 2018. While many of the closures and openings were in higher-income and well-banked areas (i.e., lower Manhattan), **over a quarter (27) of these bank closures were in low- and moderate-income census tracts, and 20% (21) were in majority Black or Latinx census tracts**. The closures are continuing into 2021.



Bank closures across New York City disproportionately harm Black and Latinx communities -- the people who live and work there, the institutions that serve there, and the small businesses that operate and create jobs there.

The problem is particularly acute in the **Bronx where approximately 20% of households are unbanked and 30% underbanked**, with even higher rates within many communities within the Bronx. Consistent with other unbanked and underbanked communities, the Bronx is predominantly Black, Indigenous, and other People of Color (BIPOC), and predominantly low-income. In fact, 91% of the Bronx is BIPOC, and within that 29% are Black and 29% Latinx. Further, over 70% of census tracts are low- or moderate-income (LMI).

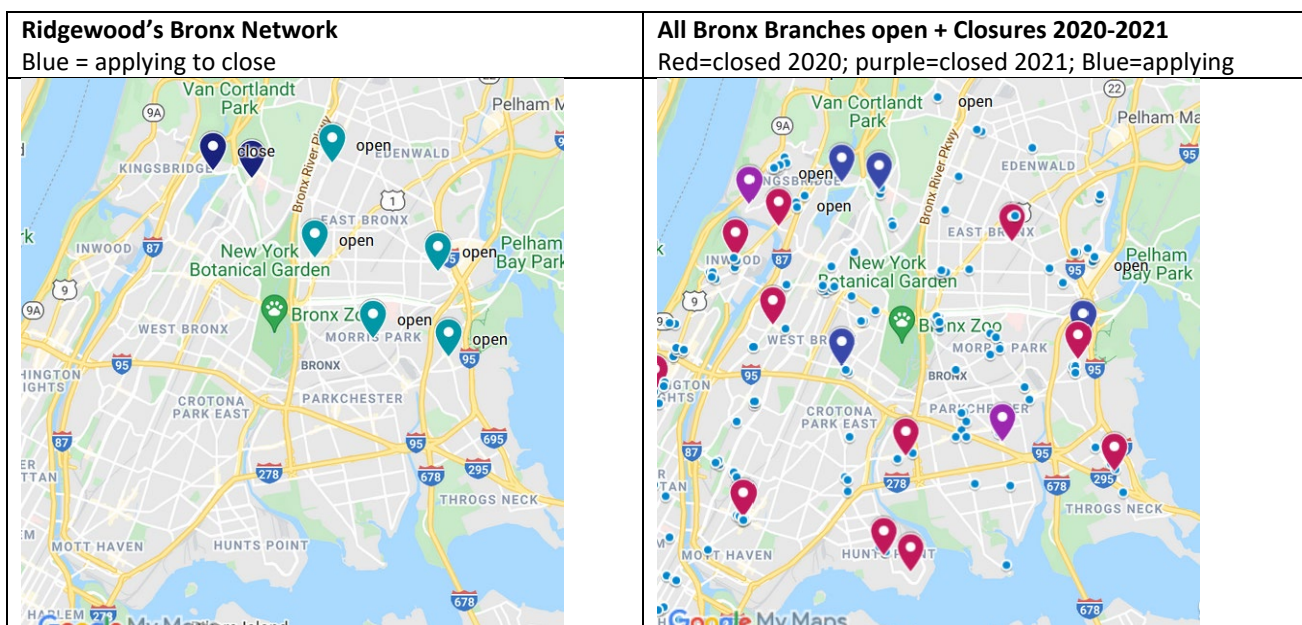
Part of the reason people are unbanked and underbanked has to do with the lack of bank branches and the numerous check cashers, private and out-of-network ATMs, and other alternative financial service providers filling the gap, often at a much higher cost to residents. **The Bronx has fewer than one branch per 10,000 people (versus Manhattan with 3.7 branches per 10,000 people).**

¹ <https://anhd.org/blog/how-branch-closures-impact-hard-hit-communities>

Other factors include language barriers, identification barriers, cost of products offered, and access to banking outside of branches. For example, there may be people who want to use online banking alone, or in conjunction with a branch, and need internet access to do so, yet 18.6% of Bronx residents [lack access to the internet](#), and that jumps to over 30% for families earning below \$20,000.

Yet, rather than expand branching and infrastructure, banks are pulling back, including Ridgewood. In the past year and a half alone, **12 branches have closed in the Bronx and another 4 are in the process of closing**. Just two opened. **That’s a decline of over 10% of branches in the Bronx. This is a crisis that must end.**

Ridgewood has 25 branches in New York City; 9 are in moderate-income census tracts, but none are in low-income census tracts, including its Bronx branches where over 40% of all census tracts are low-income. On a positive note, 68% of their branches are in majority BIPOC tracts, and 32% are in majority Black and /or Latinx. We also appreciate that they have branches in the Bronx, given how few banks have any at all there, but within their Bronx network, they have no branches in the South Bronx, and only two at all to the west of the Bronx River parkway, and that includes these two that are closing.



Impact of closures:

3445 Jerome Avenue

This branch is in a moderate-income census tract. The tract is also 91% BIPOC – 15% Black, 11% Asian, and 60% Latinx. The branch is in community district 7 in the Bronx, which is 94% BIPOC, and 87% Black and/or Latinx, with just 1.1 branch per 10,000 people, before the branch closes.

There are only two branches nearby, none of which are local state-chartered banks. Citibank is the closest, and Chase is a few blocks away. The nearest Ridgewood branch is on Sedgwick, but that too is closing.

We understand the bank is planning to reopen again near this Jerome Ave location shortly, which we appreciate, but they are still leaving the area without a branch until then and reducing their Bronx footprint overall with the Sedgwick closure.

3899 Sedgwick Avenue.

This branch is in one of the few middle-income census tracts in the Bronx, but the tract is 85% BIPOC, and 68% Latinx. It also has a large senior population – 15% of the population in this census tract is over 65 years old. The branch is within community district 8, which is whiter than the tract and borough overall, but still has a large BIPOC population and 61% are Black and/or Latinx. 20% of the population in the district are over 65 years old. The community district has a higher branch to population ratio pre-closure (1.55 per 10,000), but that encompasses a large area – there are no other bank branches at all near this one closing. As the map shows, with blue dots near showing branches open.

We urge DFS to reject any branch closures in LMI and BIPOC communities as it goes against the spirit and purpose of the CRA, which is to increase access to banks and banking in underserved communities throughout New York City, and not reduce it.

We include the bank on this communication and welcome the opportunity to work with the regulators and the bank to find ways to increase access to banking in the Bronx, and in underserved communities citywide.

Sincerely,

ANHD, ERC

