

PUBLIC DISCLOSURE

May 4, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Columbia State Bank
Certificate Number: 33826

1301 A Street
Tacoma, Washington 98402

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
San Francisco Regional Office

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This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Outstanding**.

An institution in this group has an outstanding record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
<i>* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.</i>			

The Lending Test is rated High Satisfactory.

Columbia State Bank's (CB) overall level of lending reflects good responsiveness to assessment area (AA) credit needs, a high percentage of loans being made within the institution's AAs, a good geographic distribution of loans, poor penetration of lending to borrowers of different income levels and businesses and farms of different revenue sizes, an adequate record of serving the credit needs of highly economically disadvantaged areas in its AA, use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low-or moderate-income (LMI) individuals or geographies, and that CB is a leader in making community development (CD) loans.

The Investment Test is rated Outstanding.

The institution has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, often in a leadership position. CB exhibits good responsiveness to credit and CD needs, and makes rare use of innovative and/or complex investments to support CD initiatives.

The Service Test is rated Outstanding.

Delivery systems are accessible to geographies and individuals of different income levels in its AAs. To the extent changes have been made, its record of opening and closing branches has

generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. Services, including business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. Finally, CB is a leader in providing CD services in its AAs.

DESCRIPTION OF INSTITUTION

CB is a commercial bank chartered in Tacoma, Washington. The bank is a wholly-owned subsidiary of Columbia Banking Systems Inc., a one bank holding company located in Tacoma, Washington. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation dated March 30, 2017, based on Interagency Large Institution Examination Procedures. CB did not engage in any merger or acquisition activity since the previous evaluation. CB has one subsidiary, Columbia Trust Company, established in April of 2016. The subsidiary provides trust administration and distribution, trust accounting and tax reporting, customized investment plans, and fiduciary services. Trust activities are not included within this evaluation.

Operations

CB is a full-service bank offering a broad range of banking products and services throughout a network of 146 branches in Washington, Oregon, and Idaho. While the institution remains primarily focused on commercial lending, CB also offers home mortgage, consumer, and agricultural loans. CB's deposit services include checking, savings, money market accounts, and certificates of deposit. Alternative banking services include internet and mobile banking, electronic bill pay, and the operation of 167 bank-owned automated teller machines (ATMs).

Ability and Capacity

CB's assets totaled \$14.1 billion as of December 31, 2019, including total loans of \$8.7 billion and total securities of \$3.7 billion. Real estate loans make up the majority of the loan portfolio, followed by commercial and industrial loans. Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet AA credit needs. The loan portfolio is illustrated in the following table. The evaluation was conducted at the time of the national outbreak of the COVID-19 coronavirus; while this outbreak had a relatively limited effect on the bank's lending ability and capacity, certain aspects of the federal government's response to the economic impacts of the outbreak are reflected in this evaluation.

Loan Portfolio Distribution		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	307,697	3.4
Secured by Farmland	302,515	3.4
Secured by 1-4 Family Residential Properties	700,216	7.8
Secured by Multi-family (5 or more) Residential Properties	349,068	3.9
Secured by Non-farm Non-Residential Properties	3,619,922	40.5
Total Real Estate Loans	5,279,418	59.0
Commercial and Industrial Loans	2,278,801	25.5
Agricultural Production and Other Loans to Farmers	452,929	5.1
Consumer	40,496	0.5
Obligations of States and Political Subdivisions in the United States	511,588	5.7
Other Loans	379,650	4.3
Lease Financing Receivables (net of unearned income)	139	0.00
Less: Unearned Income	-	-
Total Loans	8,943,021	100.0
<i>Source: Reports of Condition and Income as of 3/31/2020</i>		

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires financial institutions to define an AA within which the FDIC will evaluate the institution's CRA performance. Based on branch locations and loan origination activity, CB has designated 17 AAs throughout Washington, Oregon, the Portland-Vancouver-Hillsboro (PVH) Multi-State Area (MSA), and Idaho. Each state and the PVH MSA represent separate rated areas. The following table summarizes CB's AAs and the review procedures used for each.

The AA did not change since the last examination. Examiners determined the AAs adequately reflect the bank's lending and deposit operations, do not reflect illegal discrimination, and do not arbitrarily exclude LMI geographies. Refer to each rated area for complete detail, including applicable demographics and economic factors.

SCOPE OF EVALUATION

General Information

CB's performance was evaluated using the Interagency Large Institution CRA Examination Procedures. This evaluation covers the period from the prior evaluation, dated March 30, 2017, to the current evaluation, dated May 4, 2020.

Based on the distribution of branches, deposits, and reported loans, the State of Washington contributes the greatest weight to overall conclusions, followed by the State of Oregon, the PVH AA, and the State of Idaho. The bank has no lending affiliates; thus all lending activity included in this evaluation was provided directly by CB. See the following table for specific details.

Rated Area Breakdown of Loans, Deposits, and Branches						
State	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Washington	2,000,092	47.6	5,464,953	53.6	68	46.6
Oregon	1,067,041	25.4	2,412,178	23.7	39	26.7
PVH	861,936	20.5	1,764,177	17.3	25	17.1
Idaho	271,062	6.5	553,945	5.4	14	9.6
Total	4,200,131	100.0	10,195,253	100.0	146	100.0
<i>Source: Bank Records; FDIC Summary of Deposits (6/30/2019)</i> <i>Due to rounding, totals may not add to exactly 100.0</i>						

CB operates in numerous AAs located throughout three states and one multistate area. The Seattle Combined Statistical Area (CSA), PVH, Oregon Non-MSA, and Idaho Non-MSA AAs were chosen for full-scope reviews as they contain a significant portion of the bank's operations and activities overall and provide the greatest weight in determining conclusions regarding the bank's performance. Furthermore, during the scope of the evaluation examiners noted that some of CB's AAs were not reviewed using full-scope procedures in the last two examinations. In an effort to ensure an institution's CRA performance in these infrequently reviewed AAs is regularly evaluated, the Kennewick-Walla Walla CSA was also selected to be reviewed using full-scope examination procedures.

The remaining AAs were evaluated using limited-scope procedures. Full details regarding each of the bank's AAs are provided in the full- and limited-scope evaluations in the description of AAs.

Activities Reviewed

Based on the number and dollar of reported loans, small business loans contribute the most weight to overall conclusions, followed by home mortgage loans. Small farm loans received minimal weight in determining conclusions. The bank did not request the inclusion of consumer loans as part of this PE; therefore, consumer loans are excluded from review.

For the Lending Test, examiners reviewed the number and dollar volume of small business, home mortgage, and small farm loans for 2017, 2018, and 2019. While the number and dollar volume of loans are presented, examiners emphasized performance by number of loans because the number of loans is a better indicator of the number of individuals, businesses, and farms served. For CD activities and innovative and flexible lending practices, examiners evaluated data provided by bank management since the prior CRA evaluation through the date of the current evaluation.

Additionally, the Investment Test included investments made during the current evaluation period and any investments still outstanding from the prior evaluation period. The bank has no lending affiliates; thus all lending activity included in this evaluation was provided directly by CB. See the following table.

Loan Products Reviewed						
Loan Category	Universe		Reviewed		Presented	
	#	\$(000s)	#	\$(000s)	#	\$(000s)
Small Business	10,295	2,728,521	10,295	2,728,521	10,295	2,728,521
Home Mortgage	3,598	1,124,704	3,598	1,124,704	3,598	1,124,704
Small Farm	1,780	346,907	1,780	346,907	1,780	346,907
Source: Bank Records from 01/1/2017 through 12/31/2019.						

In 2017 and 2018, small business, home mortgage, and small farm lending performance are compared to both aggregate performance of other lenders operating within each AA and to relevant demographic data. In 2019, small business, home mortgage, and small farm performance is compared only to relevant demographics, as 2019 small business, home mortgage and small farm aggregate data is not available as of the date of this evaluation.

Demographic comparisons for small business and small farm lending are based on D&B data, while demographic comparisons for home mortgage lending is based on 2015 ACS/census data. More weight is given to CB's performance in comparison to aggregate data, as this is a better measure of actual lending opportunity in each AA.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

CB is rated "High Satisfactory" for performance under the Lending Test. Performance in each rated area is consistent with this conclusion, with the exception of the State of Idaho, where the performance was below that of the overall performance conclusion. The following sections address the bank's overall performance under each Lending Test component.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. The institution's performance varies somewhat by AA. Refer to each respective analysis for details.

Assessment Area Concentration

CB made a high percentage of loans in the bank's AAs. Overall, the bank made 86.2 percent of its loans by number volume and 85.1 percent by dollar volume within the AAs. Details are shown in the following table.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2017	3,663	87.2	539	12.8	4,202	933,005	85.4	159,624	14.6	1,092,628
2018	3,472	87.7	486	12.3	3,958	927,813	85.1	162,256	14.9	1,090,069
2019	3,160	85.7	526	14.3	3,686	867,703	83.1	175,875	16.9	1,043,578
Subtotal	10,295	86.9	1,551	13.1	11,846	2,728,521	84.6	497,755	15.4	3,226,275
Home Mortgage										
2017	635	88.7	81	11.3	716	249,339	87.8	34,785	12.2	284,124
2018	1,515	91.0	150	9.0	1,665	436,175	90.7	44,943	9.3	481,118
2019	1,448	90.3	156	9.7	1,604	439,190	89.3	52,841	10.7	492,031
Subtotal	3,598	90.3	387	9.7	3,985	1,124,704	89.5	132,569	10.5	1,257,272
Small Farm										
2017	595	75.8	190	24.2	785	114,288	76.8	34,507	23.2	148,795
2018	573	76.0	181	24.0	754	110,923	76.4	34,327	23.6	145,250
2019	612	75.8	195	24.2	807	121,696	75.9	38,647	24.1	160,343
Subtotal	1,780	75.9	566	24.1	2,346	346,907	76.3	107,481	23.7	454,388
Total	15,673	86.2	2,504	13.8	18,177	4,200,131	85.1	737,804	14.9	4,937,935
Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data Due to rounding, totals may not equal 100.0										

Geographic Distribution

CB's geographic distribution of loans reflects good penetration throughout its AAs. The bank's performance in the State of Washington, State of Oregon, and PVH AA were consistent and reflect good penetration throughout the AAs. Performance in the State of Idaho was below the other rated areas and reflects adequate penetration throughout the AAs. Unless otherwise stated, the bank's performance of small business lending is more heavily weighted than other products in determining overall conclusions. Also, due to the volume of loan originations, CB's performance in the State of Washington also provided more weight for developing performance conclusions. The bank's performance varies to some degree in the individual AAs. Refer to each respective analysis for details.

Borrower Profile

CB's distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different size. The bank's performance in the State of Washington and PVH AA is consistent with this conclusion. Performance in the State of Oregon and State of Idaho is above the other areas and

reflects adequate penetration. Small business lending performance in the State of Washington is more heavily weighted for determining overall conclusions. Details regarding variances in individual AA performance are discussed in each respective analysis.

Innovative or Flexible Lending Practices

CB uses innovative or flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals or geographies. CB participated in 6,652 flexible or innovative loans totaling over \$1.6 billion during the review period. This represents a significant increase by dollar volume over the last examination, where CB's innovative and flexible loans totaled \$199.3 million. The following tables detail CB's innovative and flexible lending programs over the review period. The programs and products are only presented in this section and are not presented separately within each rated area or AA analysis.

Innovative or Flexible Lending										
Type of Program	2017		2018		2019		2020		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
FHA	1	157	16	3,948	17	4,039	-	-	34	8,143
VA	29	7,545	51	15,853	64	20,230	-	-	144	44,009
FSA/RHS	-	-	10	1,918	10	1,579	-	-	20	3,497
Capital Access Program	21	1,097	17	1,000	15	950	-	-	53	3,047
FSA Guarantee	34	17,279	32	13,493	16	7,655	8	7,024	90	45,454
Muckleshoot Loan Program	101	1,348	38	667	5	85	-	-	144	2,101
SBA 504	27	40,439	54	65,294	30	33,340	7	5,450	166	144,524
Small Ag Loan Program	221	34,315	279	44,084	225	35,566	51	6,615	776	120,581
Small Business Administration	61	21,713	275	44,194	302	41,401	75	14,370	713	121,679
Tax Credit Loan	14	2,790	1	28	-	-	-	-	15	2,818
USDA Rural Development	-	-	3	1,725	-	-	-	-	3	1,725
USDA Rural Housing	1	3,900	-	-	-	-	2	3,247	3	7,147
Washington State Linked Deposit Program	34	15,042	31	13,748	38	19,816	2	1,135	105	49,742
Paycheck Protection Program	-	-	-	-	-	-	4,386	1,032,744	4,386	1,032,744
Total	544	145,625	807	205,952	722	164,661	4,531	1,070,585	6,652	1,587,211
Source: Bank Records from 4/1/2017 through 5/4/2020										

The following are examples of innovative or flexible lending practices employed during the evaluation period.

- Washington State Linked Deposit Program**— CB participates in Washington State Linked Deposit Program. As funds are available, the state invests in a certificate of deposit with a partnering financial institution at a below market rate. The savings are then passed on by the financial institution to businesses certified by the state as a minority business enterprise, women's business enterprise, or combined business enterprise. The state forgoes up to two percent of the certificate of deposit rate, which is then passed on to the borrower in the form of an interest rate reduction on the borrower's loan. During the review period, the bank originated 105 loans totaling \$49.7 million.
- Business Oregon's Capital Access Program**— Business Oregon's Capital Access Program helps lenders (banks and credit unions) make more commercial loans to small businesses and provides capital for start-up or expansion. The program is designed for non-profit and for-profit businesses seeking funds for most business purposes. During the review period

the bank originated 53 loans totaling \$3 million.

- ***Muckleshoot Loan Program***— CB partners with the Muckleshoot tribe’s credit office to provide a credit assistance program that benefits an economically disadvantaged class of persons. Although not income restricted, most borrowers under these programs are LMI individuals or families. A financial literacy component is also coupled with the program. During the evaluation period the bank originated 144 loans totaling \$2.1 million.

Community Development Loans

CB is a leader in originating CD loans throughout the AAs. CB’s performance is above that of similarly situated institutions. During the evaluation period, the bank originated 271 loans totaling \$687.7 million. This level of activity represents 5.6 percent of average total assets and 8.5 percent of average total loans. The majority of CD loan activity was directed towards economic development initiatives. All metrics increased since the previous evaluation, where CB originated 89 loans totaling \$182.6 million, representing 2.1 percent of average total assets and 3.5 percent of average total loans.

Total CD loans consist of: 42 CD loans totaling \$99.7 million in 2017; 43 CD loans totaling \$179.4 million in 2018; 41 loans totaling \$104 million in 2019; and 145 loans totaling \$304.6 million year-to-date in 2020. A majority of CD lending was conducted in the State of Washington, where CB was a leader in originating CD loans. CB did not make any broad regional CD loans during the review period.

CD lending includes qualified loans originated under the Paycheck Protection Program (PPP) in response to the COVID-19 pandemic. CB originated 145 of these loans totaling \$304.6 million.

Performance by rated area varies somewhat; refer to each state analysis for detail. The following table presents the bank’s CD loans by purpose and rated area.

Community Development Lending by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Washington	23	71,186	7	31,800	56	132,739	42	177,740	128	413,465
Oregon	16	6,988	2	2250	28	60,887	14	26,553	60	96,678
PVH	15	21,909	0	0	36	61,239	19	43,272	70	126,420
Idaho	6	31,451	0	0	5	15,640	2	4,091	13	51,182
Total	60	131,534	9	34,050	125	270,505	77	251,656	271	687,745
<i>Source: Bank Data</i>										

INVESTMENT TEST

CB is rating “Outstanding” in the Investment Test. Performance is consistent by rated area but varies slightly by AA, and is discussed in detail in the respective analyses. The institution’s level of CD investments and donations received the most weight when determining the overall Investment Test rating. The following sections address the bank’s overall performance under each Investment Test Component.

Investment and Grant Activity

CB provides an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position. CD investments, which include new and prior period investments, as well as grants and donations, total approximately \$352.8 million. CB invested approximately \$229.1 million in 45 new qualified investments, as well as \$2.1 million in qualified grants and donations during the evaluation period. The institution also maintains approximately 77 prior period qualified CD investments totaling approximately \$121.5 million.

CB's qualified CD investments include 32 investments totaling approximately \$208.6 million which are allocated to a larger regional area that includes the institution's AAs. All 32 of these regional area investments are in the form of mortgage-backed securities (MBS) that are backed by mortgages made to LMI borrowers. These MBS support the provision of affordable housing in multiple AAs throughout Washington, Idaho, and Oregon. To avoid duplication, these regional area investments are included in the table below; however, these regional area investments are not reflected in the individual rated area or full-scope AA CD investment tables.

Total qualified investments represent 3.0 percent of total average assets and 12.0 percent of total average securities as of the March 31, 2020 Call Report. This performance is consistent with the institution's performance at the previous evaluation, when the percentages were 2.8 percent and 12.0 percent, respectively. The dollar volume of CD investments increased significantly from the last evaluation, from approximately \$238.6 million to approximately \$352.8 million. CB's current level of investments also exceeds the performance of peer institutions, including those rated as having an excellent level of investments.

The following table shows a breakdown of qualified investments and donations activity by rated area and CD category.

Community Development Qualified Investments by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Washington	4	22,259	28	30,871	-	-	-	-	32	53,130
Oregon	1	504	28	26,915	-	-	-	-	29	27,419
PVH	7	40,660	1	577	-	-	1	244	9	41,481
Idaho	4	8,783	16	11,246	-	-	-	-	20	20,029
Regional Activities	32	208,570	-	-	-	-	-	-	32	208,570
Subtotal	48	280,776	73	69,609	-	-	1	244	122	350,629
Qualified Grants & Donations	53	249	520	1,509	80	358	2	8	655	2,124
Total	101	281,025	593	71,118	80	358	3	252	777	352,753
<i>Source: Bank Data</i>										

Responsiveness to Credit and Community Development Needs

CB exhibits good responsiveness to credit and CD needs. The institution's emphasis on affordable housing investments demonstrates responsiveness to CD needs identified by community contacts throughout the AAs. Refer to each rated area and full-scope analysis for further details.

Community Development Initiatives

The institution rarely uses innovative and/or complex investments to support CD initiatives. The majority of CB's investments include investments to support affordable housing in the form of MBS, and municipal bonds to support schools with populations of primarily LMI students located within the institution's AAs. While both MBS and municipal bonds are CD qualified investments that support services for LMI individuals and affordable housing, they are generally not considered innovative and/or complex investments.

SERVICE TEST

CB is rated "Outstanding" in the Service Test overall. While performance is consistent in the state of Washington and Oregon and the PVH MSA, weaker performance is noted in the State of Idaho.

Accessibility of Delivery Systems

Service delivery systems are accessible to essentially all portions of the institution's AAs. CB operates a comprehensive branch structure that consists of 146 full-service branches: 10 in low-, 44 in moderate-, 70 in middle-, and 20 in upper-income census tracts (CTs). Two branches are located in CTs with no income designation. CB also operates 167 ATMs: 153 at branch locations and 14 standalone ATMs. The bank offers online banking, online bill pay, 24-hour telephone banking, mobile banking, and mobile deposit capabilities. Specific details related to the accessibility of the bank's delivery systems are contained in each full- and limited-scope analysis.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the institution closed 11 branches: four in the Washington AAs, five in the PVH MSA, and two in the Oregon AAs. CB opened one branch during the evaluation period. Refer to each AA analysis for complete details regarding changes in the bank's branch locations.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. All branches offer the same products, including deposit accounts, Health Savings Accounts, business and consumer loan products, and applications for mortgage and consumer loans as well as credit cards. Business hours vary slightly by branch according to AA needs, with some locations offering Saturday hours and/or extended Friday hours. Refer to each individual analysis for further details.

Community Development Services

CB is a leader in providing CD services in its AAs. During the evaluation period, CB employees and officers provided 20,186 hours of qualified CD services, with: 4,790 hours of service provided in 2017; 8,103 hours of service provided in 2018; 6,774 hours of service provided in 2019; and 519 hours of service provided in 2020.

Service hours increased substantially from the 9,144 hours provided at the prior evaluation. The majority of services were attributed to Washington, where CB employees were a leader in providing

service hours to qualified CD organizations. Institution employees did not provide any broader regional or nationwide service hours during the review period.

The following table details the institution's CD services for each rated area showing the number of hours of CD services.

Community Development Services by Rated Area					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# Hours	# Hours	# Hours	# Hours	# Hours
Washington	346	7,056	1,107	75	8,584
Oregon	381	3,256	1,000	9	4,646
PVH	1,002	1,960	1,752	155	4,869
Idaho	104	1,757	224	2	2,087
Total	1,833	14,029	4,083	241	20,186
<i>Source: Bank Records</i>					

The majority of CD services provided by the bank consisted of activities that provided various community services to the bank's AAs, followed by delivery of economic development services targeted to small businesses. CB participates with local organizations in Washington, Oregon, and Idaho to provide over 9,500 free and low-cost alternative checking accounts. The bank's commitment to these programs is demonstrated by the bank receiving the BankOn National Certification for its Foundation Account offered throughout the bank's AAs.

CB also provided services in response to the COVID-19 pandemic including over \$1.2 million in loan deferrals, increased loan processing hours for PPP loans, discounts and fee waivers on bank and third-party products and services, and over \$1 million in small business and community recovery efforts.

Refer to each full- and limited-scope evaluation for a complete discussion of CD services for each AA, including notable examples where relevant.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any discriminatory or other illegal credit practices at the current examination.

WASHINGTON

CRA RATING FOR WASHINGTON: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON

CB has eight AAs delineated for the State of Washington; see the following table. The institution has not made any changes to the Washington AAs during the review period. Refer to individual AAs for key demographic and economic information specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Seattle CSA	Kitsap, Lewis, Thurston, King, Snohomish, Pierce, Thurston	890
Kennewick-Walla Walla CSA	Benton, Franklin, Walla Walla	62
Bellingham MSA	Whatcom	34
Lewiston MSA	Asotin	6
Longview MSA	Cowlitz	24
Spokane MSA	Spokane	105
Washington Non-MSA	Adams, Grant, Klickitat, Whitman	34
Yakima MSA	Yakima	45

SCOPE OF EVALUATION – WASHINGTON

Refer to the Scope of Evaluation section for the institution for details regarding the review for the State of Washington. Based on the lending activity, deposit volume, and branch distribution the Seattle CSA was reviewed using full-scope procedures and received the most consideration in determining overall performance conclusions. Furthermore, during the scope of the evaluation it was identified that some of CB's AAs were not reviewed using full-scope procedures in the last two examinations. Examiners selected the Kennewick-Walla Walla CSA to be reviewed using full-scope examination procedures to ensure the performance is regularly evaluated. The remaining Washington AAs were evaluated using limited-scope procedures and consist of the following: Bellingham MSA, Lewiston MSA, Longview MSA, Spokane MSA, Washington Non-MSA, and Yakima MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON

LENDING TEST

CB is rated “High Satisfactory” in the Lending Test in the State of Washington. This performance is consistent with the overall conclusion for the institution. Refer to the analysis for the individual AAs for additional details and a discussion of performance differences if applicable.

Lending Activity

CB’s lending levels reflect good responsiveness to AA credit needs. The institution’s performance varies somewhat by AA. Refer to each respective analysis for details.

Geographic Distribution

CB’s geographic distribution of loans reflects good penetration throughout its AAs. The bank’s performance of small business lending in the Seattle CSA demonstrated good penetration and provided more weight for determining conclusions for the state. Performance in the individual AAs was generally adequate. The bank’s performance varies to some degree in the individual AAs. Refer to each respective full- or limited-scope analysis for details.

Borrower Profile

CB’s distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different size. The bank’s performance in the Seattle CSA, Longview MSA, and Lewiston MSA is consistent with this conclusion. Performance in the other AAs is above that of the other areas noted and is adequate. Small business lending performance in the Seattle CSA is more heavily weighted for determining overall conclusions. Details regarding variances in individual AA performance are discussed in each respective analysis.

Community Development Loans

CB is a leader in originating CD loans in the Washington AAs. During the evaluation period, the bank originated 116 CD loans totaling \$379.8 million within the Washington AAs and 12 regional CD loans totaling \$33.7 million. Performance increased since the last examination, when CB made 32 loans totaling \$93.8 million in the State of Washington.

Total CD loans in the Washington AAs consist of: 25 CD loans totaling \$72.7 million in 2017; 21 CD loans totaling \$137.1 million in 2018; 14 CD loans totaling \$50.5 million in 2019; and 68 CD loans totaling \$153.2 million to date in 2020.

The majority of CD activity occurred in the Seattle CSA AA and the majority of CD activities were directed towards activities involving Revitalization or Stabilization and Economic Development. CD performance varies somewhat by AA; refer to each individual AA for detail and notable examples, where relevant.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 68 of these loans in the State of Washington AAs totaling \$153.2 million.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Seattle CSA	10	64,127	5	25,600	42	109,899	32	126,828	89	326,454
Kennewick-Walla Walla CSA	-	-	-	-	3	6,513	-	-	3	6,513
Bellingham MSA	-	-	-	-	-	-	1	1,124	1	1,124
Lewiston MSA	-	-	-	-	-	-	-	-	-	-
Longview MSA	1	60	1	3,700	2	2,899	3	7,550	7	14,209
Spokane MSA	3	2,181	-	-	-	-	-	-	3	2,181
Washington Non-MSA	6	348	-	-	2	3,704	3	22,254	11	26,306
Yakima MSA	-	-	-	-	2	3,024	-	-	2	3,024
Statewide Activities	3	4,470	1	2,500	5	6,700	3	19,984	12	33,654
Total	23	71,186	7	31,800	56	132,739	42	177,740	128	413,465
<i>Source: Bank Data</i>										

INVESTMENT TEST

CB is rated “Outstanding” in the Investment Test for the State of Washington. The performance in the Seattle CSA, Kennewick-Walla Walla CSA, Washington Non-MSA, Yakima MSA, and Bellingham MSA is consistent with state conclusions, while performance in the Spokane MSA, Longview MSA, and Lewiston MSA is below that of state conclusions.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and donations throughout the Washington AAs, particularly those not routinely provided by private investors, often in a leadership position. CB reported 348 qualified investments and donations totaling approximately \$54.3 million during the evaluation period. The total amount of new CRA-qualified investments reported was approximately \$15.8 million. The institution also held approximately \$37.3 million in prior period investments and recorded approximately \$1.2 million in grants and donations in the state. In addition to activity inside the AAs, CB was also involved with 31 regional MBS investments for an allocated amount of approximately \$120.3 million that benefitted portions of the state that included the institution’s AAs.

CB has a total of approximately \$174.6 million in qualified CD investments, considering current and prior period investments, regional investments that benefit the Washington AAs, and grants and donations. This level is a significant increase from the prior evaluation, when CB’s qualified investments and donations, including regional investments benefitting the Washington AAs, totaled approximately \$73.5 million. The institution was able to penetrate most of its AAs in the state with investment activity and all of the AAs in the state with grant and donation activity.

The following table lists the qualified CD investments and donations activity by area and CD category.

Community Development Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Seattle CSA	4	22,259	10	9,192	-	-	-	-	14	31,451
Kennewick-Walla Walla CSA	-	-	3	4,032	-	-	-	-	3	4,032
Bellingham MSA	-	-	-	-	-	-	-	-	-	-
Lewiston MSA	-	-	-	-	-	-	-	-	-	-
Longview MSA	-	-	1	2,315	-	-	-	-	1	2,315
Spokane MSA	-	-	1	1,112	-	-	-	-	1	1,112
Washington Non-MSA	-	-	3	3,052	-	-	-	-	3	3,052
Yakima MSA	-	-	10	11,168	-	-	-	-	10	11,168
Statewide Activities	-	-	-	-	-	-	-	-	-	-
Subtotal	4	22,259	28	30,871	-	-	-	-	32	53,130
Qualified Grants & Donations	27	93	260	933	28	126	1	7	316	1,159
Total	31	22,352	288	31,804	28	126	1	7	348	54,289
<i>Source: Bank Data</i>										

Community services targeted towards LMI individuals received the majority of the qualified investments with approximately \$30.9 million, which includes 26 prior period investments totaling approximately \$27.9 million that are still active. Refer to the full-scope AA analyses for further details and notable examples of qualified investments and donations.

Responsiveness to Credit and Community Development Needs

CB exhibits good responsiveness to credit and CD needs. The institution's emphasis on investments for community services targeted to LMI individuals and the support of affordable housing is reflective of needs identified by community contacts located in Washington AAs. Refer to the full-scope AA analyses for further details.

Community Development Initiatives

The institution rarely uses innovative and/or complex investments to support CD initiatives. The investments are useful and help promote CD; however, they are not considered particularly innovative and/or complex.

SERVICE TEST

CB is rated "Outstanding" in the Service Test in the State of Washington. While performance is consistent in the Seattle CSA AA, Kennewick-Walla Walla CSA AA, Spokane MSA AA, and the Washington Non-MSA AA, weaker performance is noted in the Bellingham MSA AA, Lewiston MSA AA, Longview MSA AA, and Yakima MSA AA

Accessibility of Delivery Systems

Delivery systems are accessible to geographies and individuals of different income levels in its AAs. CB operates 71 full-service branches located throughout the bank's 8 AAs in the State of Washington. Five of the bank's branches are located in low-income CTs, 18 are located in

moderate-income CTs, 35 are located in middle-income CTs, 12 are located in upper-income CTs, and 1 is located in a CT without an income designation. Refer to each full- and limited-scope analysis for additional details regarding accessibility of delivery systems.

Changes in Branch Locations

To the extent changes have been made, the institution's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. CB closed four branches in the Washington AAs during the review period all in the Seattle CSA AA. Refer to the respective full-scope analysis for complete details.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at each of the branches throughout the State of Washington. Branch locations have generally similar weekday hours that vary slightly according to AA needs. Typical hours are from 9:00 am to 5:00 pm Monday to Thursday with extended hours on Fridays. Of the 71 branches in the State of Washington, 19 offer Saturday hours including 4 located in LMI CTs.

Community Development Services

CB is a leader in providing CD services in the State of Washington. CB employees provided 8,584 hours of qualified CD services to organizations within the Washington AAs. Service hours increased since the prior evaluation, where CB employees provided 4,383 hours of services to qualified CD organizations within the Washington AAs.

The majority of the 7,056 community service hours provided in Washington supported the provision of services targeted to LMI individuals and families, an identified CD need for the AA. In the Seattle CSA AA alone employees provided 7,400 hours of service to qualified CD organizations; see the following table. Refer to each full- and limited-scope analysis for specific details and examples of qualified service activities, where relevant.

CD Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
Seattle CSA	291	6,076	976	57	7,400
Kennewick-Walla Walla CSA	-	186	-	-	186
Bellingham MSA	-	96	-	-	96
Lewiston MSA	-	1	-	-	1
Longview MSA	-	14	-	-	14
Spokane MSA	13	342	40	-	395
Washington Non-MSA	18	311	91	18	438
Yakima MSA	24	14	-	-	38
Statewide Activities	-	16	-	-	16
Total	346	7,056	1,107	75	8,584
<i>Source: Bank Records from 3/31/2017 through 5/4/2020</i>					

SEATTLE CSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN SEATTLE CSA

The Seattle CSA AA consists of all 890 CTs within the counties of Kitsap, Lewis, Thurston, King, and Snohomish, Pierce, and Mason. CB has not made any changes to the AA since the previous evaluation.

Economic and Demographic Data

Demographic Information of the Assessment Area						
Assessment Area: Seattle CSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	890	4.7	21.9	46.0	26.4	1.0
Population by Geography	4,388,174	4.8	22.1	46.1	26.8	0.2
Housing Units by Geography	1,835,534	4.8	21.6	46.3	27.2	0.1
Owner-Occupied Units by Geography	1,037,198	2.2	17.0	49.2	31.5	0.0
Occupied Rental Units by Geography	659,557	8.7	28.6	41.2	21.2	0.3
Vacant Units by Geography	138,779	5.1	22.3	48.5	24.0	0.1
Businesses by Geography	320,180	5.2	19.5	41.9	33.1	0.3
Farms by Geography	7,946	3.0	16.5	50.2	30.4	0.1
Family Distribution by Income Level	1,077,375	20.9	17.8	21.1	40.2	0.0
Household Distribution by Income Level	1,696,755	23.5	16.3	18.5	41.6	0.0
Median Family Income MSA - 14740 Bremerton-Silverdale-Port Orchard, WA MSA		\$75,652	Median Housing Value			\$327,956
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$65,272	Median Gross Rent			\$1,164
Median Family Income MSA - 36500 Olympia-Lacey-Tumwater, WA MSA		\$74,420	Families Below Poverty Level			7.7%
Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA		\$92,317				
Median Family Income MSA - 45104 Tacoma-Lakewood, WA		\$71,304				
Median Family Income Non-MSAs - WA		\$58,240				
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Competition

The FDIC's June 2019 Deposit Market Share Report shows that CB ranks 6th out of 55 FDIC-insured institutions competing within the AA, with a total of 3.9 percent of the deposit market share. According to the same data, the bank has 52 out of 1,007 branches in the AA. Three of the most prominent lenders accounted for a total of 51.3 percent of the total market share.

Community Contacts

In order to assist with determining the credit needs of the local area, examiners reviewed an existing community contact that was conducted with a representative from an economic development organization. The organization offers consulting services and resources to small businesses in King County and provides resources for start-ups and strategic advice on business expansion in sectors of key industries. The contact stated that the local economy is rapidly expanding, which has caused a shortage of available and affordable housing stock. In addition, small businesses that don't qualify for traditional financing are facing challenges obtaining capital and remaining in the local area.

Credit and Community Development Needs and Opportunities

Examiners considered information obtained from the community contacts, bank management, and demographic and economic data and determined that affordable housing represents a primary credit need in the AA. The high cost of housing and relatively high level of unemployment support this conclusion. Additionally, the median value of housing is also high in comparison to the median income levels in the AA, further supporting the need for affordable housing. Opportunities for providing financing for small businesses and start-up was also noted as an area where financial institutions could support the credit needs in the AA, as stated by the community contact.

CONCLUSIONS ON PERFORMANCE CRITERIA IN SEATTLE CSA AA

LENDING TEST

CB's Lending Test performance in the Seattle CSA AA is consistent with overall Lending Test conclusions for the State of Washington.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. In 2017 through 2019, CB originated 3,538 small business loans totaling \$1.0 billion, 1,432 home mortgage loans totaling \$528.2 million, and 35 small farm loans totaling \$6.1 million. Lending increased for small business and home mortgage loans since the previous examination, where CB originated 3,492 small business loans totaling \$891.3 million and 185 home mortgage loans totaling \$63.1 million. Small farm lending decreased; in the prior evaluation CB originated 58 loans totaling \$9.5 million. The increase in home mortgage lending is due to the fact that home equity lines of credit were not reported during the last examination and were reported and included in the current totals.

In 2017, CB ranked 12th out of 132 small business lenders who reported a total of 89,890 loans, giving the bank a market share of 1.4 percent by number and 10.1 percent by dollar volume. Three of the most prominent lenders accounted for a total of 40.7 percent of the total market share. In 2018, CB ranked 14th out of 152 lenders who reported a total of 99,096 small business loans, giving

the bank a market share of 1.2 percent by number and 9.5 percent by dollar volume. Three of the most prominent lenders accounted for a total of 49.2 percent of the total market share.

In 2017, CB ranked 121st out of 638 home mortgage lenders who reported a total of 178,021 loans, for a market share of 0.1 percent. Three of the most prominent lenders accounted for a total of 18.3 percent of the total market share by number. In 2018, CB ranked 58th out of 656 lenders who reported a total of 188,222 home mortgage loans, giving the bank a market share of 0.3 percent. Three of the most prominent lenders accounted for a total of 20.0 percent of the total market share.

In 2017, CB ranked 7th out of 20 small farm lenders who reported a total of 463 loans, giving the bank a market share of 3.2 percent by number and 14.8 percent by dollar volume. Three of the most prominent lenders accounted for a total of 67.5 percent of the total market share. In 2018, CB ranked 8th out of 22 lenders who reported a total of 527 small farm loans, giving the bank a market share of 1.7 percent by number and 10.2 percent by dollar volume. Three of the most prominent lenders accounted for a total of 67.6 percent of the total market share.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. Excellent performance in small business lending, adequate performance in home mortgage lending, and poor performance in small farm lending supports this conclusion.

Small Business Loans

The table on the following page shows the geographic distribution of small business loans reflects excellent penetration throughout the AA. The bank's lending performance in LMI geographies exceeded the aggregate performance and the corresponding D&B data during the same time period, with the exception of moderate-income tract performance in 2018, where the bank's performance was reasonably close to demographic data.

Geographic Distribution of Small Business Loans						
Assessment Area: Seattle CSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	5.1	5.2	103	8.2	28,355	8.0
2018	5.2	5.1	103	8.9	28,874	8.4
2019	--	--	98	8.6	33,877	9.8
Moderate						
2017	19.4	18.3	258	20.6	69,680	19.6
2018	19.5	18.1	219	19.0	62,352	18.1
2019	--	--	247	21.8	67,612	19.5
Middle						
2017	41.9	42.1	553	44.2	152,995	43.1
2018	41.9	41.8	518	44.9	150,700	43.7
2019	--	--	477	42.1	148,611	42.9
Upper						
2017	33.2	34.1	334	26.7	103,443	29.1
2018	33.1	34.7	311	27.0	102,744	29.8
2019	--	--	310	27.3	96,534	27.8
Not Available						
2017	0.3	0.3	3	0.2	537	0.2
2018	0.3	0.4	2	0.2	119	0.0
2019	--	--	2	0.2	104	0.0
Totals						
2017	100.0	100.0	1,251	100.0	355,010	100.0
2018	100.0	100.0	1,153	100.0	344,789	100.0
2019	--	--	1,134	100.0	346,738	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

As shown in the following table, the geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. The bank's lending performance in LMI CTs was generally below the corresponding demographic and aggregate data during the evaluation period, but not to an unreasonable degree.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Seattle CSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	2.2	2.3	3	1.4	373	0.4
2018	2.2	2.4	10	1.6	6,931	3.1
2019	2.2	--	12	2.0	5,602	2.6
Moderate						
2017	17.2	18.8	39	17.6	29,380	33.8
2018	17.2	18.5	78	12.8	19,643	8.7
2019	17.0	--	100	16.7	33,004	15.3
Middle						
2017	49.2	50.0	117	52.7	31,186	35.9
2018	49.2	49.7	243	39.8	58,676	26.0
2019	49.2	--	253	42.2	73,450	34.0
Upper						
2017	31.4	28.9	62	27.9	25,755	29.6
2018	31.4	29.4	280	45.8	140,152	62.2
2019	31.5	--	234	39.1	103,823	48.1
Not Available						
2017	0.0	0.0	1	0.5	290	0.3
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	222	100.0	86,984	100.0
2018	100.0	100.0	611	100.0	225,401	100.0
2019	100.0	--	599	100.0	215,878	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the geographic distribution of small farm loans reflects poor penetration throughout the AA. The bank did not originate any loans in low-income tracts during the review period. D&B data and aggregate performance suggest few opportunities to lend in these tracts; however, the bank's rate of lending was below both comparators. In 2017, the bank's performance in moderate-income geographies was above aggregate performance and D&B data, but CB did not originate any loans in these geographies in 2018 or 2019.

Geographic Distribution of Small Farm Loans						
Assessment Area: Seattle CSA AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	2.8	0.8	0	0.0	0	0.0
2018	3.0	0.7	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	16.3	10.3	4	26.7	713	29.8
2018	16.5	11.7	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Middle						
2017	50.2	55.1	7	46.7	1,202	50.2
2018	50.2	56.7	7	70.0	1,517	70.2
2019	--	--	8	80.0	1,159	71.7
Upper						
2017	30.7	33.6	4	26.7	477	20.0
2018	30.4	30.9	3	30.0	645	29.8
2019	--	--	2	20.0	457	28.3
Not Available						
2017	0.1	0.2	0	0.0	0	0.0
2018	0.1	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	15	100.0	2,392	100.0
2018	100.0	100.0	10	100.0	2,162	100.0
2019	--	--	10	100.0	1,616	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Borrower Profile

The distribution of borrowers reflects poor penetration among retail customers of different income levels and businesses and farms of different sizes. This conclusion is supported by the bank's poor small business lending performance, while home mortgage lending and small farm lending performance of lesser weight were adequate.

Small Business Loans

As shown in the table on the following page, the distribution of small business loans reflects poor penetration among businesses of different sizes. The bank's performance was below D&B data for

2017 and 2018 and significantly below the performance of the aggregate. The bank's performance in 2019 was largely consistent with that noted in the prior two years.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Seattle CSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	85.4	50.4	414	33.1	82,647	23.3
2018	85.9	45.3	349	30.3	78,484	22.8
2019	--	--	375	33.1	84,528	24.4
>1,000,000						
2017	5.3	--	807	64.5	270,680	76.2
2018	4.9	--	793	68.8	264,368	76.7
2019	--	--	744	65.6	258,544	74.6
Revenue Not Available						
2017	9.3	--	30	2.4	1,683	0.5
2018	9.1	--	11	1.0	1,937	0.6
2019	--	--	15	1.3	3,666	1.1
Totals						
2017	100.0	100.0	1,251	100.0	355,010	100.0
2018	100.0	100.0	1,153	100.0	344,789	100.0
2019	--	--	1,134	100.0	346,738	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The following table shows the bank's distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. CB's performance of lending to low-income borrowers is lower than corresponding demographic data, but is on par with aggregate performance. Performance of lending to moderate-income borrowers is slightly below demographic data and comparable to aggregate performance, with the exception of 2018, where a decline was noted.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Seattle CSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	20.9	4.1	10	4.5	1,366	1.6
2018	20.9	4.5	24	3.9	2,161	1.0
2019	20.9	--	27	4.5	3,017	1.4
Moderate						
2017	17.8	16.3	37	16.7	6,969	8.0
2018	17.8	15.4	59	9.7	8,040	3.6
2019	17.8	--	87	14.5	17,824	8.3
Middle						
2017	21.1	25.3	51	23.0	12,590	14.5
2018	21.1	24.9	85	13.9	16,348	7.3
2019	21.1	--	108	18.0	27,893	12.9
Upper						
2017	40.2	43.4	94	42.3	36,278	41.7
2018	40.2	43.3	311	50.9	109,079	48.4
2019	40.2	--	345	57.6	140,523	65.1
Not Available						
2017	0.0	10.9	30	13.5	29,781	34.2
2018	0.0	11.9	132	21.6	89,773	39.8
2019	0.0	--	32	5.3	26,623	12.3
Totals						
2017	100.0	100.0	222	100.0	86,984	100.0
2018	100.0	100.0	611	100.0	225,401	100.0
2019	100.0	--	599	100.0	215,879	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

As shown in the following table, the distribution of small farm loans reflects adequate penetration among farms of different sizes. The bank's performance was below D&B data for 2017 and 2018, but higher than that of the aggregate during the same time period. Performance trended downward over the review period, but the degree to which the bank outperformed aggregate lenders is adequate.

Distribution of Small Farm Loans by Gross Annual Revenue Category						
Assessment Area: Seattle CSA AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	95.0	52.2	10	66.7	1,282	53.6
2018	95.1	47.1	5	50.0	775	35.8
2019	--	--	4	40.0	350	21.7
>1,000,000						
2017	3.0	--	5	33.3	1,110	46.4
2018	2.9	--	5	50.0	1,387	64.2
2019	--	--	3	30.0	550	34.0
Revenue Not Available						
2017	2.0	--	0	0.0	0	0.0
2018	2.0	--	0	0.0	0	0.0
2019	--	--	3	30.0	716	44.3
Totals						
2017	100.0	100.0	15	100.0	2,392	100.0
2018	100.0	100.0	10	100.0	2,162	100.0
2019	--	--	10	100.0	1,616	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Community Development Loans

CB is a leader in providing CD loans in the Seattle CSA AA, originating 89 loans totaling \$326.5 million during the evaluation period. CD lending increased by number and dollar since the last examination, where CB originated 26 CD loans totaling \$91.4 million. The majority of CD loans targeted Community Service initiatives, an identified CD need for the AA; see the following table.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 55 of these loans in the Seattle CSA AA totaling \$126.7 million.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	2	10,144	4	21,100	6	22,771	-	-	12	54,015
2018	4	32,948	-	-	6	19,187	4	59,250	14	111,385
2019	4	21,034	1	4,500	3	8,803	-	-	8	34,337
YTD 2020	-	-	-	-	27	59,138	28	67,578	55	126,716
Total	10	64,126	5	25,600	42	109,899	32	126,828	89	326,453
<i>Source: Bank Data</i>										

Notable examples of CB's CD loans in the AA include the following:

- In 2017, CB funded a \$10 million loan to an Affordable Housing organization for the new construction of a 295-unit affordable housing project in the AA. Affordable housing is noted as a primary credit need within the AA.
- In 2018, CB funded a \$6.3 million SBA 504 energy loan for a property management company to transition to LED lighting to support efficient and renewable energy.
- In 2018, CB funded a \$43 million loan to a business supporting the creation and retention of over 1,000 predominantly low- and moderate-income jobs in an area distressed due to poverty.

INVESTMENT TEST

CB has an excellent level of qualified CD investments and donations in the Seattle CSA AA, exhibits good responsiveness to credit and CD needs, and makes rare use of innovative and/or complex investments to support CD initiatives.

Investment and Grant Activity

CB has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position in the AA. The combined CD investments, both new and remaining from the prior period, including grants and donations, total approximately \$32.4 million. The total amount of new CRA-qualified investments reported was approximately \$12.9 million, and consisted of two MBS that were allocated to multi-family housing for LMI individuals. The institution also held approximately \$18.6 million in prior period investments and recorded approximately \$972,000 in grants and donations in the AA.

In addition to activity directly inside the AA, CB was also involved with 30 regional MBS investments for an allocated amount of approximately \$109.1 million that benefitted the Seattle CSA AA. CB has a total of approximately \$141.5 million in qualified CD investments, considering current and prior period investments, regional investments that benefit the AA, and grants and donations. This level is a significant increase from the last evaluation, when CB's qualified investments and donations totaled approximately \$19.1 million. CB's level of qualified investments is also well above those of peer institutions operating in the AA.

The following table details the qualified investments and donations made or held during the review period by year and CD type.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	2	9,404	10	9,192	-	-	-	-	12	18,596
2017	-	-	-	-	-	-	-	-	-	-
2018	2	12,855	-	-	-	-	-	-	2	12,855
2019	-	-	-	-	-	-	-	-	-	-
YTD 2020	-	-	-	-	-	-	-	-	-	-
Subtotal	4	22,259	10	9,192	-	-	-	-	14	31,451
Qualified Grants & Donations	23	83	206	766	24	123	-	-	253	972
Total	27	22,342	216	9,958	24	123	-	-	267	32,423
<i>Source: Bank Data</i>										

The following are notable examples of CD donations extended in the AA:

- Throughout the evaluation period, CB donated approximately \$75,500 to an organization that provides community services for LMI individuals in the AA. The organization provides employment support services as well as assistance for victims of domestic violence.

- During the review period, CB made 5 donations totaling approximately \$54,000 to an organization that provides affordable housing for LMI individuals in the AA. The organization uses innovative housing solutions, including home sharing and transitional housing programs, to work to eradicate homelessness throughout the area.
- In 2019, CB donated \$11,000 to an economic development and SBA partner organization. The organization provides no-cost assistance to small businesses, including mentoring and education.

Responsiveness to Credit and Community Development Needs

CB exhibits good responsiveness to credit and CD needs. The emphasis on affordable housing for and community services targeted toward LMI and homeless individuals is reflective of needs identified by a community contact in the AA.

Community Development Initiatives

The institution makes rare use of innovative and/or complex investments to support CD initiatives. The institution's qualified investments are useful and help promote CD, but are not considered innovative as the investments held and purchased by the institution during the review period consist of municipal bonds and MBS.

SERVICE TEST

CB's Service Test performance in the Seattle CSA AA is consistent with overall conclusions for the State of Washington.

Accessibility of Delivery Systems

Service delivery systems are accessible to geographies and individuals of different income levels in its AAs. CB operates 50 full-service branches in the AA. Four branches, accounting for 8 percent of the bank's branch presence in the AA, are located in a low-income CT, which is comparable to the 8.2 percent of all other institution's branches operating in the AA. Eleven of the bank's branches, or 22 percent, are located in moderate-income CTs. This is lower than other institutions, which operate 28.4 percent of branches in moderate-income CTs, but is in line with the percentages of households, families, and businesses in the area. CB also operates 27 branches in middle-income CTs and 8 branches in upper-income CTs.

Changes in Branch Locations

To the extent changes have been made, the institution's closing of branches has generally not adversely affected the accessibility of its delivery system, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, CB closed four branches located in middle-income tracts in this AA. None of the closed branches were in close proximity to LMI CTs and the bank maintains branches within 3 miles of two of the four closed locations.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Products and services are virtually the same in the Seattle CSA AA as those discussed in the Service Test portion for the State of Washington. Of the 50 branches, 20 offer Saturday hours, including 2 branches located in low-income CTs and 3 branches located in moderate-income CTs.

Community Development Services

The institution is a leader in providing CD services in the Seattle CSA AA. During the evaluation period, officers and employees provided 7,400 hours of qualified CD services. Service hours increased from the prior evaluation, when CB employees provided 3,615 hours to the AA. The majority of services provided by the bank consisted of activities that provided various community services targeted to LMI individuals and families, an identified AA CD need.

The following table details the institution's CD services for each year of the evaluation period by year and type of services provided.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
2017	125	1,694	352	-	2,171
2018	62	2,227	349	-	2,638
2019	96	2,014	262	54	2,426
YTD 2020	8	141	13	3	165
Total	291	6,076	976	57	7,400
<i>Source: Bank Records 3/31/2017 to 5/4/2020</i>					

Below are examples of CD services provided by bank employees:

- In 2019, employees volunteered with an organization that partners with local agencies to provide housing assistance, no-cost health services, and child care assistance for LMI individuals in the AA.
- In 2019, employees volunteered with an organization that provides comprehensive mental health care targeted to LMI individuals of all ages.
- In 2020, employees volunteered with an organization that provides youth and adult financial literacy courses to LMI individuals in the AA.

KENNEWICK-WALLA WALLA CSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN KENNEWICK-WALLA WALLA CSA AA

The Kennewick-Walla Walla CSA AA consists of all 62 CTs within the counties of Benton, Franklin, and Walla Walla. CB has not made any changes to the AA since the previous evaluation.

Economic and Demographic Data

Demographic Information of the Assessment Area						
Assessment Area: Kennewick-Walla Walla CSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	62	3.2	25.8	38.7	27.4	4.8
Population by Geography	331,099	3.4	28.1	40.5	27.1	0.9
Housing Units by Geography	121,270	3.3	26.2	41.8	28.7	0.0
Owner-Occupied Units by Geography	76,047	1.7	22.1	40.7	35.5	0.0
Occupied Rental Units by Geography	37,804	6.7	34.4	42.8	16.1	0.0
Vacant Units by Geography	7,419	1.8	26.8	48.5	23.0	0.0
Businesses by Geography	17,342	2.2	26.6	42.9	27.9	0.4
Farms by Geography	1,437	1.4	20.0	61.0	17.4	0.2
Family Distribution by Income Level	79,525	21.6	17.2	19.9	41.2	0.0
Household Distribution by Income Level	113,851	23.9	15.9	18.7	41.4	0.0
Median Family Income MSA - 28420 Kennewick-Richland, WA MSA		\$66,500	Median Housing Value			\$181,634
Median Family Income MSA - 47460 Walla Walla, WA MSA		\$62,309	Median Gross Rent			\$820
			Families Below Poverty Level			12.1%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Competition

The FDIC’s June 2019 Deposit Market Share Report shows that CB ranks 13th out of 19 FDIC-insured institutions competing within the AA, with a total of 1.8 percent of the deposit market share. According to the same data, the bank has 3 out of 71 branches in the AA. Three of the most prominent lenders accounted for a total of 44.0 percent of the total market share.

Community Contacts

Examiners reviewed information from a recent community contact within the FFIEC's database from an organization operating in an area that includes Benton and Franklin counties. The contact was a representative of an economic development organization with a primary mission of attracting businesses to the community, creating jobs, and expanding current businesses to improve the economic health of the Tri-Cities area. The contact emphasized the ongoing need for small business lending and also noted that there is a need for credit for entrepreneurs looking to start or expand small businesses.

Credit and Community Development Needs and Opportunities

Examiners determined that small business lending represents a primary credit need in the AA. Additionally, economic development represents a primary CD need for the AA. These conclusions are primarily based on community contact information, interviews with bank management, and review of relevant area demographics.

CONCLUSIONS ON PERFORMANCE CRITERIA IN KENNEWICK-WALLA WALLA CSA AA

LENDING TEST

CB's Lending Test performance in the Kennewick-Walla Walla CSA AA is consistent with overall Lending Test conclusions for the State of Washington.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. During 2017, 2018, and 2019, CB originated 135 small business loans totaling approximately \$42.7 million, 57 home mortgage loans totaling \$15.8 million, and 83 small farm loans totaling \$19.5 million. Lending levels for each product varied since the previous examination where CB made 144 small business loans totaling approximately \$37.8 million and 18 home mortgage loans totaling approximately \$6.4 million. Small farm loans accounted for 87 loan originations totaling approximately \$17.0 million at the prior examination.

In 2017, CB ranked 92nd out of 313 lenders who reported a total of 11,539 originated or purchased home mortgage loans, giving the bank a market share of 0.1 percent. Three of the most prominent lenders accounted for a total of 20.1 percent of the total market share by number. In 2018, CB ranked 70th out of 318 lenders who reported a total of 12,495 originated or purchased home mortgage loans, giving the bank a market share of 0.2 percent. Three of the most prominent lenders accounted for a total of 17.7 percent of the total market share by number.

In 2017, CB ranked 19th out of 63 lenders who reported a total of 4,413 originated or purchased small business loans, giving the bank a market share of 0.9 percent by number and 6.6 percent by dollar volume. Three of the most prominent lenders accounted for a total of 40.8 percent of the total market share by number. In 2018, CB ranked 15th out of 64 lenders who reported a total of 4,743 originated or purchased small business loans, giving the bank a market share of 1.0 percent by number and 7.2 percent by dollar volume. Three of the most prominent lenders accounted for a total of 38.9 percent of the total market share by number.

In 2017, CB ranked 5th out of 21 lenders who reported a total of 365 originated or purchased small farm loans, giving the bank a market share of 8.2 percent by number and 21.6 percent by dollar volume. Three of the most prominent lenders accounted for a total of 48.8 percent of the total market share by number. In 2018, CB ranked 7th out of 20 lenders who reported a total of 353 originated or purchased small farm loans, giving the bank a market share of 7.7 percent by number and 22.8 percent by dollar volume. Three of the most prominent lenders accounted for a total of 45.6 percent of the total market share by number.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. Adequate performance in small business lending, home mortgage lending, and small farm lending supports this conclusion.

Small Business Loans

The following table shows the geographic distribution of small business loans reflects adequate penetration throughout the AA. CB had no loan originations in low-income CTs in 2017 and 2018, but showed improvement in 2019. The bank's lending performance in moderate-income tracts was generally consistent with both aggregate performance and D&B data, with the exception of 2018 when the performance was above both comparators.

Geographic Distribution of Small Business Loans						
Assessment Area: Kennewick-Walla Walla CSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	2.4	2.0	0	0.0	0	0.0
2018	2.2	2.4	0	0.0	0	0.0
2019	--	--	2	4.2	1,011	6.5
Moderate						
2017	27.3	26.9	9	23.1	2,606	20.1
2018	26.6	26.4	14	29.2	3,773	26.4
2019	--	--	12	25.0	3,168	20.5
Middle						
2017	42.7	40.9	22	56.4	7,376	57.0
2018	42.9	40.4	21	43.8	6,995	48.9
2019	--	--	22	45.8	6,622	42.8
Upper						
2017	27.2	29.9	8	20.5	2,955	22.8
2018	27.9	30.3	13	27.1	3,524	24.7
2019	--	--	11	22.9	4,615	29.8
Not Available						
2017	0.4	0.3	0	0.0	0	0.0
2018	0.4	0.4	0	0.0	0	0.0
2019	--	--	1	2.1	65	0.4
Totals						
2017	100.0	100.0	39	100.0	12,937	100.0
2018	100.0	100.0	48	100.0	14,292	100.0
2019	--	--	48	100.0	15,481	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. The bank did not originate any loans in low-income tracts during the review period; however, demographic data and aggregate performance indicate a low level of opportunity for home mortgage lending. CB's lending in moderate-income tracts was below demographic data, with the exception of 2018, where the bank demonstrated a significant improvement in performance. CB's performance was in line with aggregate for 2017 and significantly above the rate reported by other lenders in 2018.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Kennewick-Walla Walla CSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	1.7	1.4	0	0.0	0	0.0
2018	1.7	1.6	0	0.0	0	0.0
2019	1.7	--	0	0.0	0	0.0
Moderate						
2017	22.1	19.1	2	20.0	358	12.6
2018	22.1	19.9	7	35.0	1,898	27.9
2019	22.1	--	4	14.8	1,131	18.2
Middle						
2017	40.7	39.7	5	50.0	1,766	62.2
2018	40.7	39.5	9	45.0	4,278	62.9
2019	40.7	--	14	51.9	3,327	53.6
Upper						
2017	35.5	39.8	3	30.0	714	25.2
2018	35.5	38.9	4	20.0	628	9.2
2019	35.5	--	9	33.3	1,751	28.2
Not Available						
2017	0.0	0.1	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	10	100.0	2,838	100.0
2018	100.0	100.0	20	100.0	6,804	100.0
2019	100.0	--	27	100.0	6,208	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the geographic distribution of small farm loans reflects adequate penetration throughout the AA. CB's lack of loan originations in low-income CTs during the review period are not unreasonable, given that data for aggregate performance and demographics indicate a very low demand and opportunity to lend. The bank's lending performance in moderate-income was above D&B data and aggregate performance in 2017, but registered a decline 2018 and again in 2019.

Geographic Distribution of Small Farm Loans						
Assessment Area: Kennewick-Walla Walla CSA AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	1.3	0.3	0	0.0	0	0.0
2018	1.4	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	20.0	21.8	7	23.3	1,070	14.8
2018	20.0	19.9	4	14.8	837	13.3
2019	--	--	3	11.5	835	13.8
Middle						
2017	61.6	62.3	18	60.0	4,901	67.8
2018	61.0	60.4	14	51.9	3,579	56.7
2019	--	--	14	53.8	3,130	51.8
Upper						
2017	16.9	15.4	5	16.7	1,255	17.4
2018	17.4	19.4	9	33.3	1,891	30.0
2019	--	--	9	34.6	2,082	34.4
Not Available						
2017	0.1	0.3	0	0.0	0	0.0
2018	0.2	0.3	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	30	100.0	7,226	100.0
2018	100.0	100.0	27	100.0	6,307	100.0
2019	--	--	26	100.0	6,047	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and businesses and farms of different sizes. This conclusion is supported by the bank's adequate small business lending performance and good home mortgage lending and small farm lending performance.

Small Business Loans

As shown in the following table, the distribution of small business loans reflects adequate penetration among businesses of different sizes. The bank's performance was below D&B data

during the evaluation period; however, CB's performance was above aggregate performance for both 2017 and 2018. In 2019, the bank's performance registered a significant decline.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Kennewick-Walla Walla CSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	82.4	50.8	22	56.4	5,884	45.5
2018	83.0	46.0	25	52.1	6,667	46.6
2019	--	--	16	33.3	3,920	25.3
>1,000,000						
2017	5.2	--	17	43.6	7,053	54.5
2018	4.8	--	23	47.9	7,625	53.4
2019	--	--	31	64.6	11,328	73.2
Revenue Not Available						
2017	12.5	--	0	0.0	0	0.0
2018	12.2	--	0	0.0	0	0.0
2019	--	--	1	2.1	233	1.5
Totals						
2017	100.0	100.0	39	100.0	12,937	100.0
2018	100.0	100.0	48	100.0	14,292	100.0
2019	--	--	48	100.0	15,481	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The bank's distribution of home mortgage lending reflects good penetration to LMI borrowers. CB's performance of lending to low-income borrowers was above aggregate data for 2017 and 2018, but trended steeply downward during the review period. In comparison to demographic data, the bank's performance was above for only 2017. In 2017 and 2018, the bank's lending performance to moderate-income borrowers shows rates slightly above demographic data and above aggregate. In 2019, performance declined, but not to an unreasonable amount when compared to demographic data. See the following table.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Kennewick-Walla Walla CSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	21.6	4.5	3	30.0	739	26.0
2018	21.6	5.9	2	10.0	315	4.6
2019	21.6	--	1	3.7	85	1.4
Moderate						
2017	17.2	15.9	2	20.0	419	14.8
2018	17.2	18.2	4	20.0	636	9.3
2019	17.2	--	4	14.8	323	5.2
Middle						
2017	19.9	25.0	1	10.0	157	5.5
2018	19.9	24.8	3	15.0	408	6.0
2019	19.9	--	6	22.2	1,477	23.8
Upper						
2017	41.2	43.0	3	30.0	751	26.5
2018	41.2	38.2	6	30.0	3,671	54.0
2019	41.2	--	12	44.4	2,920	47.0
Not Available						
2017	0.0	11.6	1	10.0	773	27.2
2018	0.0	12.9	5	25.0	1,774	26.1
2019	0.0	--	4	14.8	1,403	22.6
Totals						
2017	100.0	100.0	10	100.0	2,838	100.0
2018	100.0	100.0	20	100.0	6,804	100.0
2019	100.0	--	27	100.0	6,208	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the distribution of small farm loans reflects good penetration among farms of different sizes. Although the bank's performance was below D&B data during the evaluation period, the degree to which CB outperformed the aggregate is indicative of good performance. The bank's performance also declined in 2018 compared to aggregate, but was well above the rates reported by other lenders.

Distribution of Small Farm Loans by Gross Annual Revenue Category						
Assessment Area: Kennewick-Walla Walla CSA AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	92.5	51.1	24	80.0	5,411	74.9
2018	92.3	39.0	18	66.7	3,971	63.0
2019	--	--	20	76.9	4,197	69.4
>1,000,000						
2017	5.1	--	6	20.0	1,815	25.1
2018	5.3	--	9	33.3	2,336	37.0
2019	--	--	6	23.1	1,850	30.6
Revenue Not Available						
2017	2.4	--	0	0.0	0	0.0
2018	2.4	--	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	30	100.0	7,226	100.0
2018	100.0	100.0	27	100.0	6,307	100.0
2019	--	--	26	100.0	6,047	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Community Development Loans

CB has made a relatively high level of CD loans in the Kennewick-Walla Walla CSA AA, originating 3 loans totaling \$6.5 million during the evaluation period. CD lending increased by number and dollar since the last examination, where CB originated 1 CD loan totaling \$1.5 million. As shown in the following table, all of the CD loans targeted Economic Development initiatives.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 2 of these loans in the Kennewick-Walla Walla CSA AA totaling \$4.8 million

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	-	-	-	-	1	1,733	-	-	1	1,733
2018	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
YTD 2020	-	-	-	-	2	4,780	-	-	2	4,780
Total	-	-	-	-	3	6,513	-	-	3	6,513

Source: Bank Data

A notable example of CB's CD loans in the AA include the following:

- In 2017, CB funded a \$1.7 million SBA 504 loan to a coffee distribution warehouse business supporting job creation primarily geared towards LMI individuals in the AA.

INVESTMENT TEST

CB has an excellent level of qualified CD investments and donations in the Kennewick-Walla Walla CSA AA, exhibits adequate responsiveness to credit and CD needs, and makes rare use of innovative and/or complex investments to support CD initiatives.

Investment and Grant Activity

CB has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position in the AA. The combined CD investments, both new and remaining from the prior period, including grants and donations, total approximately \$4.0 million. The total amount of new CRA-qualified investments reported was approximately \$2.0 million. The institution also held approximately \$2.0 million in prior period investments and recorded approximately \$17,000 in grants and donations in the AA.

In addition to activity directly inside the AA, CB was also involved with 6 regional MBS investments for an allocated amount of approximately \$1.0 million that benefitted the Kennewick-Walla Walla CSA AA. CB has a total of approximately \$5.1 million in qualified CD investments, considering current and prior period investments, regional investments that benefit the AA, and grants and donations. This level is a large increase from the prior evaluation, when CB's qualified investments and donations totaled approximately \$1.6 million.

The following table details the qualified investments and donations made or held during the review period by year and CD type.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	2	2,020	-	-	-	-	2	2,020
2017	-	-	1	2,012	-	-	-	-	1	2,012
2018	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
YTD 2020	-	-	-	-	-	-	-	-	-	-
Subtotal	-	-	3	4,032	-	-	-	-	3	4,032
Qualified Grants & Donations	-	-	5	17	-	-	-	-	5	17
Total	-	-	8	4,049	-	-	-	-	8	4,049
<i>Source: Bank Data</i>										

The following are notable examples of CD investments and donations extended in the AA:

- In 2017, CB purchased a \$2.0 million school bond to assist in the renovation of the Career and Technical Education Buildings as well as provide other improvements throughout the district. The school district has a high poverty level and the majority of students enrolled are eligible for the free or reduced lunch program.
- Throughout the evaluation period, CB donated approximately \$15,000 to an organization that provides community services targeted toward LMI children in the AA.

Responsiveness to Credit and Community Development Needs

The institution exhibits adequate responsiveness to credit and CD needs of the AA. The institution's emphasis on community service investments is reflect of a need in the area for critical assistance to LMI individuals; however, community contacts also mentioned a need for assistance in the area of economic development.

Community Development Initiatives

CB makes rare use of innovative and/or complex investments to support CD initiatives. The institution's qualified investments are useful and help promote CD; however, they are not considered innovative as the investments held by the institution during the review period are school bonds.

SERVICE TEST

CB's performance in the Kennewick-Walla Walla CSA AA is below that of overall Service Test conclusions for the State of Washington.

Accessibility of Delivery Systems

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs. CB operates 3 full-service branches in the AA. The bank does not have any branches located in low-income CTs in the AA; however, aggregate data shows that only 1.3 percent of all other institution's branches are located in these two tracts. One, or 33.3 percent, of the bank's branches are located in moderate-income tracts, which is consistent with the branches operated in these geographies by other institutions. CB also operates one branch located in a middle- and one branch located in an upper-income tract.

Changes in Branch Locations

CB did not open or close any branches in the Kennewick-Walla Walla CSA AA during the evaluation period; therefore, this criterion did not affect conclusions for the state.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Products and services are similar to those discussed in the Service Test portion for the State of Washington.

Community Development Services

The institution provides a relatively high level of CD services in the Kennewick-Walla Walla CSA AA. During the evaluation period, officers and employees provided 186 hours of qualified CD services in the AA. Service hours are similar to the prior evaluation, when CB employees provided 184 hours to the AA. The majority of services provided by the bank consisted of activities that supported community services for LMI individuals. The following table details the institution's CD services for each year of the evaluation period by year and type of service provided.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
2017	-	12	-	-	12
2018	-	106	-	-	106
2019	-	68	-	-	68
YTD 2020	-	-	-	-	-
Total	-	186	-	-	186
<i>Source: Bank Records 3/31/2017 to 5/4/2020</i>					

Below are notable examples of CD services provided by bank employees:

- In 2019, employees volunteered with a non-profit in the AA that empowers women and children to create healthy family and community lives. This organization benefits LMI individuals.
- In 2018, employees volunteered with an organization providing afterschool care to youth in an area where 71.2 percent of students are eligible for the free/reduced lunch program.

OTHER WASHINGTON ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Washington AAs in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did/did not impact/alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Bellingham MSA	Below	Consistent	Below
Lewiston MSA	Below	Below	Below
Longview MSA	Below	Below	Below
Spokane MSA	Consistent	Below	Consistent
Washington Non-MSA	Below	Consistent	Consistent
Yakima MSA	Below	Consistent	Below

The following facts and data support the conclusions for each limited-scope AA; additional information is in the Limited-Scope Assessment Areas Appendices.

Bellingham MSA

The institution operates one branch in the AA which is located in a CT with no income designation.

Activity	#	\$
Small Business Loans	56	\$17.7 million
HMDA Loans	30	\$9.0 million
Small Farm Loans	1	\$125,000
CD Loans	1	\$1.1 million
Investments (New)	8	\$4.3 million
Investments (Prior Period)	2	\$233,033
Donations	2	\$8,000
CD Services	96 hours	

Lewiston MSA

The institution operates one branch in the AA which is located in a moderate-income CT.

Activity	#	\$
Small Business Loans	23	\$4.5 million
HMDA Loans	7	\$1.2 million
Small Farm Loans	11	\$1.3 million
CD Loans	0	\$0
Investments (New)	2	\$410,800
Investments (Prior Period)	-	-
Donations	1	\$300
CD Services	1 hour	

Longview MSA

The institution operates two branches in the AA: one in a low-income CT, one in a middle-income CT.

Activity	#	\$
Small Business Loans	108	\$34.4 million
HMDA Loans	34	\$15.6 million
Small Farm Loans	0	\$0
CD Loans	7	\$14.2 million
Investments (New)	3	\$593,075
Investments (Prior Period)	2	\$2.5 million
Donations	1	\$1,000
CD Services	14 hours	

Spokane MSA

The institution operates two branches in the AA: one in a moderate-income CT, one in a high-income CT.

Activity	#	\$
Small Business Loans	228	\$60.6 million
HMDA Loans	72	\$19.7 million
Small Farm Loans	15	\$2.9 million
CD Loans	3	\$2.2 million
Investments (New)	1	\$943,964
Investments (Prior Period)	2	\$1.4 million
Donations	36	\$60,215
CD Services	395 hours	

Washington Non-MSA

CB operates 11 branches in the Washington Non-MSA AA, including 3 branches in moderate-income CTs, 6 branches in middle income CTs, and 2 branches in upper-income CTs.

Activity	#	\$
Small Business Loans	199	\$47.4 million
HMDA Loans	133	\$28.8 million
Small Farm Loans	232	\$42.1
CD Loans	11	\$26.3 million
Investments (New)	5	\$1.0 million
Investments (Prior Period)	5	\$3.8 million
Donations	12	\$12,900
CD Services	438 hours	

Yakima MSA

The institution operates two branches in the AA: two in a moderate-income CT.

Activity	#	\$
Small Business Loans	136	\$37.9 million
HMDA Loans	25	\$9.7 million
Small Farm Loans	27	\$7.4 million
CD Loans	2	\$3 million
Investments (New)	2	\$1.1 million
Investments (Prior Period)	14	\$11.6 million
Donations	2	\$3,500
CD Services	38 hours	

OREGON

CRA RATING FOR OREGON: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OREGON

CB has four AAs delineated for the State of Oregon; see the following table. The institution has not made any changes to the Oregon AAs during the review period. Refer to individual AAs for key demographic and economic information specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Oregon Non-MSA	Clatsop, Coos, Hood River, Jefferson, Lincoln, Malheur, Tillamook, Umatilla, Wasco	94
Bend MSA	Deschutes	24
Eugene-Springfield MSA	Lane	87
Salem MSA	Marion, Polk	70

SCOPE OF EVALUATION – OREGON

Refer to the Scope of Evaluation section for the institution for details regarding the review for the State of Oregon. The Oregon Non-MSA was selected for review using full-scope procedures based on the lending activity, deposit volume, and branch distribution. The Oregon Non-MSA received the most weight for determining overall performance conclusions. The remaining Oregon AAs were evaluated using limited-scope procedures and consist of the following: Bend MSA, Eugene-Springfield MSA, and Salem MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON

LENDING TEST

CB is rated “High Satisfactory” in the Lending Test in the State of Oregon, which is consistent with the institution’s overall performance. The bank’s performance is generally consistent throughout the Oregon AAs and is discussed in each full- or limited-scope analysis.

Lending Activity

CB’s lending levels reflect good responsiveness to AA credit needs. The institution’s performance varies somewhat by AA. Refer to each respective analysis for details.

Geographic Distribution

CB's geographic distribution of loans reflects good penetration throughout its AAs and was consistent for the individual AAs. The bank's performance of small business lending, particularly in the Oregon Non-MSA and Eugene-Springfield MSA provided more weight for determining conclusions for the state. Refer to each respective full- or limited-scope analysis for details.

Borrower Profile

CB's distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different size. The bank's performance in the Oregon Non-MSA and Salem MSA is consistent with this conclusion. Performance in the other AAs is below that of the other areas noted and is poor. Small business lending performance in the Eugene-Springfield MSA and Oregon Non-MSA is more heavily weighted for determining overall conclusions. Details regarding variances in individual AA performance are discussed in each respective analysis.

Community Development Loans

CB is a leader in originating CD loans in the Oregon AAs. During the evaluation period, the bank originated 60 CD loans totaling \$96.7 million within the Oregon AAs. Performance increased since the last examination, when CB made 23 loans totaling \$17.4 million in the State of Oregon.

Total CD loans in the Oregon AAs consist of: 10 CD loans totaling \$11.7 million in 2017; 11 CD loans totaling \$15.8 million in 2018; and 14 CD loans totaling \$20.5 million in 2019. The majority of CD activity occurred in the Oregon Non-MSA and the Eugene-Springfield MSA AAs and the majority of CD activities were directed towards economic development initiatives, an identified community need.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 25 of these loans in the State of Oregon AAs totaling \$48.7 million.

CD performance varies somewhat by AA; refer to each individual AA for detail and notable examples, where relevant.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oregon Non-MSA	-	-	-	-	8	15,723	6	12,730	14	28,453
Bend MSA	5	4,473	-	-	3	9,367	-	-	8	13,840
Eugene-Springfield MSA	1	74	1	600	10	19,203	3	3,396	15	23,273
Salem MSA	1	82	1	1,650	4	7,518	5	10,427	11	19,677
Statewide Activities	9	2,359	-	-	3	9,076	-	-	12	11,435
Total	16	6,988	2	2,250	28	60,887	14	26,553	60	96,678

Source: Bank Data

INVESTMENT TEST

CB is rated “Outstanding” in the Investment Test for the State of Oregon. The performance in each AA is consistent with state conclusions.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and donations throughout the Oregon AAs, particularly those not routinely provided by private investors, often in a leadership position. CB reported 161 qualified investments and donations totaling approximately \$27.8 million during the evaluation period. The total amount of new CRA-qualified investments reported was approximately \$8.3 million. The institution also held approximately \$19.1 million in prior period investments and recorded approximately \$337,000 in grants and donations in the state. In addition to activity inside the AAs, CB was also involved with 24 regional MBS investments for an allocated amount of approximately \$28.7 million that benefitted portions of the state that include the institution’s AAs.

CB has a total of approximately \$56.5 million in qualified CD investments, considering current and prior period investments, regional investments that benefit Oregon AAs, and grants and donations. This level is a significant increase from the previous evaluation, when CB’s qualified investments and donations, including regional investments benefitting the Oregon AAs, totaled approximately \$28.6 million. The institution was able to penetrate all of its AAs in the state with investment and donation activity, when considering regional investments that benefit the various AAs.

The following table lists the qualified CD investments and donations activity by area and CD category.

Community Development Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oregon Non-MSA	-	-	17	12,886	-	-	-	-	17	12,886
Bend MSA	-	-	-	-	-	-	-	-	-	-
Eugene-Springfield MSA	-	-	4	3,295	-	-	-	-	4	3,295
Salem MSA	-	-	6	8,759	-	-	-	-	6	8,759
Statewide Activities	1	504	1	1,975	-	-	-	-	2	2,479
Subtotal	1	504	28	26,915	-	-	-	-	29	27,419
Qualified Grants & Donations	6	40	101	239	25	58	-	-	132	337
Total	7	544	129	27,154	25	58	-	-	161	27,756
<i>Source: Bank Data</i>										

Community services targeted towards LMI individuals received the majority of the qualified investments with approximately \$26.9 million, which includes 18 prior period investments totaling approximately \$18.6 million that are still active. Refer to the full-scope AA analysis for further details and notable examples of qualified investments and donations.

Responsiveness to Credit and Community Development Needs

CB exhibits good responsiveness to credit and CD needs in the Oregon AAs. The institution's emphasis on investments for community services targeted to LMI individuals and the support of affordable housing through regional MBS investments that benefit the Oregon AAs is reflective of needs identified by community contacts.

Community Development Initiatives

The institution rarely uses innovative and/or complex investments to support CD initiatives. The investments are useful and help promote CD; however, they are not considered particularly complex and/or innovative.

SERVICE TEST

CB is rated "Outstanding" in the Service Test in the State of Oregon. Performance is consistent in the Oregon Non-MSA AA, Bend MSA AA, Eugene-Springfield MSA AA, and Salem MSA AA.

Accessibility of Delivery Systems

Consistent with overall conclusions, delivery systems are accessible to geographies and individuals of different income levels in its AAs. CB operates 41 full-service branches located throughout the bank's Oregon AAs. One branch is located in a low-income CT, 13 are located in moderate-income CTs, 24 are located in middle-income CTs, and 3 are located in upper-income CTs. Refer to each full- and limited-scope analysis for additional details regarding accessibility of delivery systems.

Changes in Branch Locations

To the extent changes have been made, the institution's closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. CB closed two branches in the Oregon AAs during the review period both in the Eugene-Springfield MSA AA. Refer to the limited-scope analysis for complete details.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at each of the branches throughout the State of Oregon. Branch locations have generally similar weekday hours that vary slightly according to AA needs. Typical hours are from 9:00 am to 5:00 pm with extended hours on Fridays. Of the 41 branch locations in the State of Oregon, 2 offer Saturday hours. Refer to each full- and limited-scope analysis for additional details.

Community Development Services

The institution is a leader in providing CD services in the State of Oregon. During the review period, CB officers and employees provided 4,646 hours of qualified CD services to organizations within the Oregon AAs. Service hours increased from the prior evaluation, where CB employees provided 1,661 hours of service to qualified CD organizations within Oregon.

The following table shows that the majority of service hours were provided in the Oregon Non-MSA AA, where CB employees provided 3,022 hours of service to qualified CD organizations. At 3,256 hours, the majority of service hours provided in Oregon supported the provision of community services targeted to LMI individuals and families. CB employees did not provide any

regional or statewide services during the evaluation period. Refer to each full- and limited-scope analysis for specific details and examples of qualified service activities, where relevant.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
Oregon Non-MSA	340	1,854	819	9	3,022
Bend MSA	-	153	-	-	153
Eugene-Springfield MSA	41	702	102	-	845
Salem MSA	-	547	73	-	620
Statewide Activities	-	-	6	-	6
Total	381	3,256	1,000	9	4,646
<i>Source: Bank Records from 3/31/2017 through 5/4/2020</i>					

OREGON NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN OREGON NON-MSA AA

The Oregon Non-MSA AA consists of all 94 CTs within the counties of Clatsop, Coos, Hood River, Jefferson, Lincoln, Malheur, Tillamook, Umatilla, and Wasco. CB has not made any changes to the AA since the previous evaluation.

Economic and Demographic Data

According to the 2015 ACS Census, the Oregon Non-MSA AA contained no low-, 7 moderate-, 66 middle-, and 16 upper-income CTs. The Oregon Non-MSA AA also contains 5 CTs without an income designation.

Demographic Information of the Assessment Area						
Assessment Area: OR Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	94	0.0	7.4	70.2	17.0	5.3
Population by Geography	349,525	0.0	6.3	75.6	18.1	0.0
Housing Units by Geography	173,478	0.0	6.6	78.0	15.4	0.0
Owner-Occupied Units by Geography	86,461	0.0	5.7	76.3	18.0	0.0
Occupied Rental Units by Geography	48,478	0.0	8.4	77.8	13.8	0.0
Vacant Units by Geography	38,539	0.0	6.1	82.1	11.8	0.0
Businesses by Geography	25,551	0.0	7.5	76.6	15.8	0.0
Farms by Geography	2,229	0.0	3.3	69.1	27.6	0.0
Family Distribution by Income Level	86,450	19.6	17.6	20.8	42.0	0.0
Household Distribution by Income Level	134,939	22.4	16.4	18.1	43.1	0.0
Median Family Income Non-MSAs - OR		\$51,555	Median Housing Value			\$199,575
			Median Gross Rent			\$764
			Families Below Poverty Level			12.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Competition

The FDIC's June 2019 Deposit Market Share Report shows that CB ranks 2nd out of 17 FDIC-insured institutions competing within the AA, with a total of 15.8 percent of the deposit market share. According to the same data, the bank has 18 out of 114 branches in the AA. Three of the most prominent lenders accounted for a total of 51.4 percent of the total market share.

Community Contacts

Examiners interviewed a community contact with an organization operating in a regional area that includes Coos County. The contact was a representative of an economic development organization with a primary mission of supporting the retention, expansion, and attraction of traded-sector business and industry to the Southern Oregon Coast that provide living wage jobs. The contact noted a primary need for economic development and job creation. The contact also noted a need for small business credit and education.

Credit and Community Development Needs and Opportunities

Examiners determined that small business lending represents a primary credit need in the AA. Additionally, economic development represents a primary CD need for the AA. These conclusions are primarily based on community contact information, interviews with bank management, and review of relevant area demographics.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON NON-MSA AA

LENDING TEST

CB's Lending Test performance in the Oregon Non-MSA AA is consistent with overall Lending Test conclusions for the State of Oregon.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. During 2017, 2018, and 2019, CB originated 854 small business loans totaling approximately \$172.0 million, 397 home mortgage loans totaling \$95.8 million, and 601 small farm loans totaling \$110.8 million. Lending increased for each product since the previous examination, where CB originated 791 small business loans totaling \$156.7 million, 161 home mortgage loans totaling \$50.5 million, and 521 small farm loans totaling \$91.5 million.

In 2017, CB ranked 35th out of 368 lenders who reported a total of 10,670 originated or purchased home mortgage loans, giving the bank a market share of 0.7 percent. Three of the most prominent lenders accounted for a total of 19.7 percent of the total market share by number. In 2018, CB ranked 16th out of 357 lenders who reported a total of 11,568 originated or purchased home mortgage loans, giving the bank a market share of 1.4 percent. Three of the most prominent lenders accounted for a total of 19.5 percent of the total market share by number.

In 2017, CB ranked 8th out of 65 lenders who reported a total of 6,027 originated or purchased small business loans, giving the bank a market share of 4.6 percent by number and 25.2 percent by dollar volume. Three of the most prominent lenders accounted for a total of 43.4 percent of the total market share by number. In 2018, CB ranked 9th out of 68 lenders who reported a total of 6,360 originated or purchased small business loans, giving the bank a market share of 4.8 percent by number and 25.0 percent by dollar volume. Three of the most prominent lenders accounted for a total of 44.0 percent of the total market share by number.

In 2017, CB ranked 1st out of 19 lenders who reported a total of 762 originated or purchased small farm loans, giving the bank a market share of 25.2 percent by number and 50.6 percent by dollar volume. Three of the most prominent lenders accounted for a total of 57.3 percent of the total market share by number. In 2018, CB ranked 1st out of 23 lenders who reported a total of 842 originated or purchased small farm loans, giving the bank a market share of 22.2 percent by number and 47.2 percent by dollar volume. Three of the most prominent lenders accounted for a total of 51.2 percent of the total market share by number.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. Excellent performance in small business lending, good performance in home mortgage lending, and adequate performance in small farm lending supports this conclusion. The AA does not include any low-income geographies; therefore, examiners limited the analysis of the bank's lending performance to moderate-income tracts.

Small Business Loans

The following table shows the geographic distribution of small business loans reflects excellent penetration throughout the AA. The bank's rate of lending in moderate-income tracts was above both aggregate performance and D&B data for the entire evaluation period.

Geographic Distribution of Small Business Loans						
Assessment Area: OR Non-MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	7.7	6.9	26	9.4	5,511	9.9
2018	7.5	6.3	27	8.9	4,275	7.2
2019	--	--	23	8.3	4,979	8.7
Middle						
2017	76.5	76.5	191	69.2	37,032	66.3
2018	76.6	77.4	230	76.2	46,483	78.5
2019	--	--	206	74.6	43,529	76.4
Upper						
2017	15.8	16.6	59	21.4	13,320	23.8
2018	15.8	16.3	45	14.9	8,483	14.3
2019	--	--	47	17.0	8,469	14.9
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	276	100.0	55,863	100.0
2018	100.0	100.0	302	100.0	59,241	100.0
2019	--	--	276	100.0	56,977	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The following table shows the geographic distribution of home mortgage loans reflects good penetration throughout the AA. The bank's lending performance was above that of the aggregate during the review period and slightly above demographic data for each year.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: OR Non-MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Moderate						
2017	5.7	4.8	6	7.8	1,617	5.9
2018	5.7	5.7	10	6.0	1,805	4.8
2019	5.7	--	8	5.2	1,403	4.6
Middle						
2017	76.3	76.8	59	76.6	16,154	59.3
2018	76.3	76.0	123	73.7	21,264	56.0
2019	76.3	--	110	71.9	22,152	72.2
Upper						
2017	18.0	18.5	12	15.6	9,484	34.8
2018	18.0	18.3	34	20.4	14,894	39.2
2019	18.0	--	35	22.9	7,123	23.2
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	77	100.0	27,254	100.0
2018	100.0	100.0	167	100.0	37,963	100.0
2019	100.0	--	153	100.0	30,678	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the geographic distribution of small business loans reflects adequate penetration throughout the AA. The bank's rate of lending in moderate-income tracts was generally consistent with both aggregate performance and D&B data for the entire evaluation period.

Geographic Distribution of Small Farm Loans						
Assessment Area: OR Non-MSA AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	2.9	3.1	5	2.6	805	2.2
2018	3.3	3.1	6	3.2	1,046	3.0
2019	--	--	5	2.3	1,057	2.7
Middle						
2017	69.4	74.4	135	70.3	25,211	69.4
2018	69.1	73.2	133	71.1	23,210	66.6
2019	--	--	171	77.0	28,751	72.5
Upper						
2017	27.6	22.6	52	27.1	10,301	28.4
2018	27.6	23.6	48	25.7	10,590	30.4
2019	--	--	46	20.7	9,849	24.8
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	192	100.0	36,317	100.0
2018	100.0	100.0	187	100.0	34,846	100.0
2019	--	--	222	100.0	39,657	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and businesses and farms of different sizes. This conclusion is supported by the bank's adequate small business lending performance, poor home mortgage lending and good small farm lending performance.

Small Business Loans

CB's performance of small business lending reflects adequate penetration among business of different sizes. The following table shows the bank's performance was below D&B data during the evaluation period; however, CB's performance was consistent with the rates reported by the aggregate, indicating adequate performance.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: OR Non-MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	84.1	56.8	150	54.3	21,211	38.0
2018	84.1	55.5	173	57.3	26,438	44.6
2019	--	--	148	53.6	21,703	38.1
>1,000,000						
2017	4.3	--	122	44.2	34,495	61.8
2018	4.2	--	128	42.4	32,480	54.8
2019	--	--	128	46.4	35,274	61.9
Revenue Not Available						
2017	11.5	--	4	1.4	157	0.3
2018	11.7	--	1	0.3	323	0.5
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	276	100.0	55,863	100.0
2018	100.0	100.0	302	100.0	59,241	100.0
2019	--	--	276	100.0	56,977	100.0
<i>Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>						

Home Mortgage Loans

The bank's distribution of home mortgage lending reflects poor penetration to LMI borrowers. CB's performance of lending to low- and moderate- income borrowers lagged demographic data throughout the review period. The bank did not make any loans to low-income borrowers in 2017. In 2018, CB's performance improved and was slightly above aggregate. In 2019, the bank's performance decreased. In 2017, lending to moderate-income borrowers was less than half of the rate reported by aggregate. In 2018, the bank's performance improved, but remained below aggregate. In 2019, CB's performance improved slightly. See the following table.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: OR Non-MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	19.6	2.7	0	0.0	0	0.0
2018	19.6	3.0	7	4.2	1,003	2.6
2019	19.6	--	3	2.0	417	1.4
Moderate						
2017	17.6	11.3	4	5.2	631	2.3
2018	17.6	11.3	14	8.4	1,246	3.3
2019	17.6	--	14	9.2	1,425	4.6
Middle						
2017	20.8	21.1	16	20.8	2,776	10.2
2018	20.8	21.2	36	21.6	3,540	9.3
2019	20.8	--	27	17.6	3,294	10.7
Upper						
2017	42.0	50.5	36	46.8	7,396	27.1
2018	42.0	50.6	88	52.7	17,994	47.4
2019	42.0	--	97	63.4	21,575	70.3
Not Available						
2017	0.0	14.4	21	27.3	16,452	60.4
2018	0.0	13.9	22	13.2	14,180	37.4
2019	0.0	--	12	7.8	3,968	12.9
Totals						
2017	100.0	100.0	77	100.0	27,254	100.0
2018	100.0	100.0	167	100.0	37,963	100.0
2019	100.0	--	153	100.0	30,678	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the distribution of small farm loans reflects good penetration among farms of different sizes. CB's performance was significantly above that of the aggregate. The bank's performance was below D&B data during the evaluation period, but not to an unreasonable degree.

Distribution of Small Farm Loans by Gross Annual Revenue Category						
Assessment Area: OR Non-MSA AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	94.5	65.9	177	92.2	33,690	92.8
2018	93.7	62.1	159	85.0	28,262	81.1
2019	--	--	197	88.7	33,533	84.6
>1,000,000						
2017	3.7	--	15	7.8	2,627	7.2
2018	4.1	--	28	15.0	6,584	18.9
2019	--	--	24	10.8	6,086	15.3
Revenue Not Available						
2017	1.8	--	0	0.0	0	0.0
2018	2.2	--	0	0.0	0	0.0
2019	--	--	1	0.5	38	0.1
Totals						
2017	100.0	100.0	192	100.0	36,317	100.0
2018	100.0	100.0	187	100.0	34,846	100.0
2019	--	--	222	100.0	39,657	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Community Development Loans

CB made a relatively high number of CD loans in the Oregon Non-MSA AA, originating 14 loans totaling \$28.5 million during the evaluation period. CD lending increased by number and dollar since the last examination, where CB originated 8 CD loan totaling \$11.8 million. As seen in the following table, the majority of CD loans targeted Economic Development initiatives.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 4 of these loans in the Oregon Non-MSA AA totaling \$8.7 million.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	-	-	-	-	1	1,500	3	7,243	4	8,743
2018	-	-	-	-	1	1,850	2	3,275	3	5,125
2019	-	-	-	-	3	5,878			3	5,878
YTD 2020	-	-	-	-	3	6,495	1	2,212	4	8,707
Total	-	-	-	-	8	15,723	6	12730	14	28,453

Source: Bank Data

Notable examples of CB's CD loans in the AA include the following:

- In 2017, CB funded a \$1.3 million loan to a family-run business which supported the retention of 150 jobs in a distress/underserved CT.
- In 2017, CB funded a \$3 million loan to an urban renewal agency in the AA that helps attract job producing private investments and eliminate blight in multiple moderate-income CTs.
- In 2018, CB funded a \$1.6 million loan to support job retention for a local business in an area distressed due to poverty.

INVESTMENT TEST

CB has an excellent level of qualified CD investments and donations in the Oregon Non-MSA AA, exhibits good responsiveness to credit and CD needs, and makes rare use of innovative and/or complex investments to support CD initiatives.

Investment and Grant Activity

CB has an excellent level of qualified investments in the AA, particularly those that are not routinely provided by private investors, often in a leadership position. The combined CD investments, both new and remaining from the prior period, including grants and donations, total approximately \$13.0 million. The total amount of new CRA-qualified investments reported was approximately \$5.1 million. The institution also held approximately \$7.8 million in prior period investments and recorded approximately \$108,000 in grants and donations in the AA.

In addition to activity directly inside the AA, CB was also involved with 11 regional MBS investments for an allocated amount of approximately \$2.5 million that benefitted the Oregon Non-MSA AA. CB has a total of approximately \$15.5 million in qualified CD investments, considering current and prior period investments, regional investments that benefit the AA, and grants and donations. This level is a significant increase from the prior evaluation, when CB's qualified investments and donations in the AA totaled approximately \$7.4 million.

The following table details the qualified investments and donations made or held during the review period by year and CD type.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	10	7,817	-	-	-	-	10	7,817
2017	-	-	5	3,114	-	-	-	-	5	3,114
2018	-	-	-	-	-	-	-	-	-	-
2019	-	-	2	1,955	-	-	-	-	2	1,955
YTD 2020	-	-	-	-	-	-	-	-	-	-
Subtotal	-	-	17	12,886	-	-	-	-	17	12,886
Qualified Grants & Donations	1	1	37	82	16	25	-	-	54	108
Total	1	1	54	12,968	16	25	-	-	71	12,994
<i>Source: Bank Data</i>										

The following are notable examples of CD investments and donations extended in the AA:

- In 2017, CB purchased 4 school bonds for a total of \$2.4 million to assist in the renovation and maintenance of school buildings throughout the district. The school district has a high poverty level and the majority of students enrolled are eligible for the free or reduced lunch program.
- In 2019, CB donated \$50,000 to an organization that provides community services to homeless individuals throughout Clatsop County. The organization provides a variety of services, including access to food, assistance securing health insurance and housing vouchers, and financial education.
- During the evaluation period, CB provided donations totaling \$11,000 to a medical center in a rural community in Oregon. The medical center provides essential health services to LMI individuals and those without health insurance.

Responsiveness to Credit and Community Development Needs

The institution exhibits good responsiveness to credit and CD needs of the AA. The institution's emphasis on affordable housing (although not reflected in the table above) and community service investments is responsive to a need in the area for critical assistance to and affordable housing for LMI individuals.

Community Development Initiatives

CB makes rare use of innovative and/or complex investments to support CD initiatives. The institution's qualified investments are useful and help promote CD; however, they are not considered innovative as the investments held by the institution during the review period are school bonds and MBS.

SERVICE TEST

CB's Service Test performance in the Oregon Non-MSA AA is consistent with overall Service Test conclusions for the State of Oregon.

Accessibility of Delivery Systems

Service delivery systems are accessible to geographies and individuals of different income levels in its AAs. CB operates 17 full-service branches in the AA. There are no low-income CTs within the Oregon Non-MSA AA. Three of the bank's branches, or 17.6 percent, are located in moderate-income CTs. This is comparable to other institutions, which operate 16.7 percent of branches in moderate-income CTs. CB also operates 13 branches in middle-income CTs and one branch in an upper-income CT.

Changes in Branch Locations

During the evaluation period, the bank did not open or close any branches in the Oregon Non-MSA AA; as such, this criterion did not affect conclusions for the AA.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Products and services are virtually the same in the Oregon Non-MSA AA as those discussed in the Service Test portion for the State of Oregon; 2 of the 17 branches offer Saturday hours.

Community Development Services

The institution is a leader in the provision of CD services in the Oregon Non-MSA AA. During the evaluation period, officers and employee provided 3,021 hours of qualified CD services. Service hours increased from the prior evaluation, where CB employees provided 1,287 hours to the AA. The majority of services provided by the bank consisted of activities that provided various community services targeted to LMI individuals and families and organizations that promote economic development in the AA; see the following table.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
2017	66	416	165	-	647
2018	48	1,082	359	-	1,489
2019	218	333	269	9	829
YTD 2020	8	22	26	-	56
Total	340	1,853	819	9	3,021
<i>Source: Bank Records 3/31/2017 to 5/4/2020</i>					

Below are examples of CD services provided by bank employees:

- In 2018, an employee volunteered with a not-for-profit organization in the AA dedicated to helping LMI individuals achieve economic independence by providing financial education, entrepreneurial training, and one-on-one financial coaching.
- In 2019, employees volunteered with an organization serving LMI individuals by providing weekend meals to students who rely heavily on free and reduced lunches, offering cooking classes for at-risk youth, and providing parenting and survival skills for families at risk of child abuse and neglect.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Oregon AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did/did not impact/alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Bend MSA	Consistent	Consistent	Consistent
Eugene-Springfield MSA	Consistent	Consistent	Consistent
Salem MSA	Consistent	Consistent	Consistent

Bend MSA

The institution operates three branches in the AA: three in a moderate-income CT.

Activity	#	\$
Small Business Loans	336	\$96.0 million
HMDA Loans	93	\$32.9 million
Small Farm Loans	15	\$3.6 million
Community Development Loans	8	\$13.8 million
Investments (New)	9	\$5.9 million
Investments (Prior Period)	3	\$187,336
Donations	14	\$19,550
CD Services	153 hours	

Eugene MSA

The institution operates seven branches in the AA: one in a low-income CT, two in a moderate-income CT, and four in a middle-income CT.

Activity	#	\$
Small Business Loans	994	\$217.0 million
HMDA Loans	119	\$36.3 million
Small Farm Loans	14	\$4.9 million
Community Development Loans	15	\$ 23.3 million
Investments (New)	16	\$9.8 million
Investments (Prior Period)	3	\$2.7 million
Donations	31	\$76,525
CD Services	845 hours	

Salem MSA

The institution operates twelve branches in the AA: four in a moderate-income CT, six in a middle-income CT, and two in an upper-income CT.

Activity	#	\$
Small Business Loans	640	\$163.0 million
HMDA Loans	345	\$76.2 million
Small Farm Loans	248	\$57.7 million
CD Loans	11	\$19.7 million
Investments (New)	17	\$10.6 million
Investments (Prior Period)	8	\$9.0 million
Donations	33	\$132,380
CD Services	620 hours	

PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA AA Full-Scope Review

CRA RATING FOR PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA AA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA AA

The PVH MSA AA consists of all 372 CTs that make up Clackamas, Yamhill, Washington, Multnomah, and Clark Counties. These CT's are part of MSA #38900.

Economic and Demographic Data

According to the 2015 ACS Census, the PVH MSA contained 10 low-, 87 moderate-, 154 middle-, and 118 upper-income CTs. The AA also contains three CTs with no income designation. Additional demographic data is in the following table.

Demographic Information of the Assessment Area						
Assessment Area: PVH AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	372	2.7	23.4	41.4	31.7	0.8
Population by Geography	1,815,185	2.4	25.3	42.1	30.0	0.2
Housing Units by Geography	743,838	2.2	24.3	42.2	31.0	0.3
Owner-Occupied Units by Geography	417,043	1.0	19.3	43.9	35.7	0.0
Occupied Rental Units by Geography	283,999	3.9	31.3	39.4	24.7	0.6
Vacant Units by Geography	42,796	2.3	26.1	43.3	27.9	0.3
Businesses by Geography	171,156	2.9	20.8	37.5	35.8	2.9
Farms by Geography	5,116	1.6	15.4	52.3	30.0	0.7
Family Distribution by Income Level	436,453	21.6	16.9	20.0	41.5	0.0
Household Distribution by Income Level	701,042	24.5	16.0	17.7	41.8	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR- WA MSA		\$73,089	Median Housing Value			\$298,370
			Median Gross Rent			\$1,025
			Families Below Poverty Level			9.6%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Competition

The FDIC's June 2019 Deposit Market Share Report shows that CB ranks 8th out of 32 FDIC-insured institutions competing within the AA, with a total of 3.4 percent of the deposit market share. According to the same data, the bank has 26 out of 497 branches in the AA. Three of the most prominent lenders accounted for a total of 57.3 percent of the total market share.

Community Contacts

Examiners reviewed information from a recent community contact within the FFIEC's database from an organization operating in an area that includes Multnomah and Washington counties. The contact was a representative of an organization that advocates for business at all levels of government to support commerce, community health, and the regions overall prosperity. The contact stated that rising home prices contribute to a significant need for affordable housing in the area.

Credit and Community Development Needs and Opportunities

Examiners determined that affordable housing represents a primary credit need and small business lending represents a secondary credit need in the PVH MSA. Additionally, affordable housing and economic development represent CD needs for the AA. These conclusions are primarily based on community contacts, interviews with bank management, and review of relevant area demographics.

SCOPE OF EVALUATION – PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA AA

Refer to the Scope of Evaluation section for the institution for details regarding the review for the PVH MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN PORTLAND- VANCOUVER-HILLSBORO MULTISTATE MSA AA

LENDING TEST

CB is rated "High Satisfactory" in the Lending Test in the PVH Multistate MSA, which is consistent with the institution's overall performance.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. During 2017, 2018, and 2019, CB originated 2,405 small business loans totaling approximately \$642.2 million, 536 home mortgage loans totaling \$174.9 million, and 180 small farm loans totaling \$44.7 million. Lending increased for small business and home mortgage loans since the previous examination, where CB originated 2,066 small business loans totaling \$573.0 million and 197 home mortgage loans totaling \$114.2 million. Small farm lending decreased from the previous examination, where CB originated 224 loans totaling \$45.6 million.

In 2017, CB ranked 24th out of 586 lenders who reported a total of 91,642 originated or purchased home mortgage loans, giving the bank a market share of 1.1 percent. Three of the most prominent lenders accounted for a total of 18.2 percent of the total market share by number. In 2018, CB

ranked 13th out of 577 lenders who reported a total of 93,980 originated or purchased home mortgage loans, giving the bank a market share of 1.7 percent. Three of the most prominent lenders accounted for a total of 17.5 percent of the total market share by number.

In 2017, CB ranked 9th out of 134 lenders who reported a total of 53,018 originated or purchased small business loans, giving the bank a market share of 2.0 percent by number and 14.3 percent by dollar volume. Three of the most prominent lenders accounted for a total of 44.3 percent of the total market share by number. In 2018, CB ranked 9th out of 144 lenders who reported a total of 58,517 originated or purchased small business loans, giving the bank a market share of 1.7 percent by number and 13.1 percent by dollar volume. Three of the most prominent lenders accounted for a total of 46.0 percent of the total market share by number.

In 2017, CB ranked 6th out of 14 lenders who reported a total of 685 originated or purchased small farm loans, giving the bank a market share of 9.6 percent by number and 55.4 percent by dollar volume. Three of the most prominent lenders accounted for a total of 57.6 percent of the total market share by number. In 2018, CB ranked 6th out of 20 lenders who reported a total of 704 originated or purchased small farm loans, giving the bank a market share of 8.8 percent by number and 45.3 percent by dollar volume. Three of the most prominent lenders accounted for a total of 61.5 percent of the total market share by number.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. Excellent performance in small business lending, good performance in home mortgage lending, and poor small farm lending performance supports this conclusion. See the tables on the following pages.

Small Business Loans

The following table shows the geographic distribution of small business loans reflects excellent penetration throughout the AA. The bank's performance of lending in both LMI tracts exceeded both aggregate performance and D&B data throughout the review period. In general, CB's performance also displayed an upward trend.

Geographic Distribution of Small Business Loans						
Assessment Area: PVH AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	2.9	2.8	41	4.7	11,090	4.9
2018	2.9	2.9	40	4.9	13,914	6.4
2019	--	--	48	6.7	12,868	6.5
Moderate						
2017	20.6	20.6	224	25.5	58,522	25.6
2018	20.8	20.8	181	22.3	45,145	20.8
2019	--	--	185	25.8	47,871	24.3
Middle						
2017	37.6	37.8	275	31.4	69,297	30.3
2018	37.5	37.5	269	33.1	68,957	31.8
2019	--	--	222	31.0	66,606	33.8
Upper						
2017	35.9	36.7	309	35.2	81,073	35.5
2018	35.8	36.6	302	37.2	82,830	38.2
2019	--	--	231	32.3	64,255	32.6
Not Available						
2017	3.0	2.2	28	3.2	8,351	3.7
2018	2.9	2.2	20	2.5	5,797	2.7
2019	--	--	30	4.2	5,660	2.9
Totals						
2017	100.0	100.0	877	100.0	228,334	100.0
2018	100.0	100.0	812	100.0	216,643	100.0
2019	--	--	716	100.0	197,260	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The following table shows the geographic distribution of home mortgage loans reflects good penetration throughout the AA. CB's performance in low-income tracts was above demographic data and aggregate performance. Although a decline was noted in 2018 and 2019, the bank's performance remained comparable to demographic data and aggregate data for 2018. CB's lending in moderate-income tracts also registered a decline over the review period, but was consistent with aggregate performance and with the exception of 2019 was above demographic data.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: PVH AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	1.0	1.1	3	3.1	6,153	12.8
2018	1.0	1.1	3	1.3	1,376	2.4
2019	1.0	--	1	0.5	100	0.1
Moderate						
2017	19.3	21.8	22	22.9	7,278	15.2
2018	19.3	20.5	47	20.4	11,515	20.1
2019	19.3	--	39	18.6	12,998	18.6
Middle						
2017	43.9	44.2	42	43.8	13,335	27.8
2018	43.9	43.2	101	43.9	23,735	41.4
2019	43.9	--	104	49.5	31,889	45.7
Upper						
2017	35.7	32.8	29	30.2	21,169	44.2
2018	35.7	35.1	79	34.3	20,651	36.1
2019	35.7	--	65	31.0	22,535	32.3
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	1	0.5	2,250	3.2
Totals						
2017	100.0	100.0	96	100.0	47,935	100.0
2018	100.0	100.0	230	100.0	57,278	100.0
2019	100.0	--	210	100.0	69,771	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the geographic distribution of small farm loans reflects poor penetration throughout the AA. The bank did not originate any loans in low-income tracts during the evaluation period; however, D&B data and aggregate performance suggest very limited opportunities to lend in this area. The bank's performance in moderate-income tracts showed a decline over the review period and was lower than D&B data and aggregate performance.

Geographic Distribution of Small Farm Loans						
Assessment Area: PVH AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	1.6	0.7	0	0.0	0	0.0
2018	1.6	0.6	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	14.8	9.1	4	6.3	840	5.5
2018	15.4	6.9	1	1.7	225	1.5
2019	--	--	2	3.6	800	5.4
Middle						
2017	53.0	62.3	50	78.1	11,976	78.4
2018	52.3	67.3	52	86.7	12,095	82.4
2019	--	--	49	87.5	12,335	83.6
Upper						
2017	30.0	27.1	10	15.6	2,460	16.1
2018	30.0	24.7	7	11.7	2,365	16.1
2019	--	--	5	8.9	1,620	11.0
Not Available						
2017	0.7	0.8	0	0.0	0	0.0
2018	0.7	0.5	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	64	100.0	15,276	100.0
2018	100.0	100.0	60	100.0	14,685	100.0
2019	--	--	56	100.0	14,755	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and businesses and farms of different sizes. This conclusion is supported by the bank's poor small business lending performance, adequate home mortgage lending and good small farm lending performance.

Small Business Loans

As shown in the following table, the distribution of small business loans reflects poor distribution among businesses of different sizes. CB's lending performance during the review period reflected a slight upward trend; however, the extent to which the bank performed in comparison to D&B data and aggregate indicate poor performance.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: PVH AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	87.5	53.4	267	30.4	45,199	19.8
2018	87.5	48.4	261	32.1	45,695	21.1
2019	--	--	245	34.2	49,021	24.9
>1,000,000						
2017	4.8	--	595	67.8	181,770	79.6
2018	4.7	--	549	67.6	170,877	78.9
2019	--	--	469	65.5	147,789	74.9
Revenue Not Available						
2017	7.6	--	15	1.7	1,365	0.6
2018	7.8	--	2	0.2	71	0.0
2019	--	--	2	0.3	450	0.2
Totals						
2017	100.0	100.0	877	100.0	228,334	100.0
2018	100.0	100.0	812	100.0	216,643	100.0
2019	--	--	716	100.0	197,260	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The bank's distribution of home mortgage lending reflects adequate penetration to LMI borrowers. CB's performance of lending to low-income borrowers was below demographic data throughout the review period, but was generally consistent with aggregate performance during the same time period. In moderate-income tracts the bank's performance was slightly below demographic data, but similar to aggregate performance and trended upward during the review period. See the following table.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: PVH AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	21.6	3.2	5	5.2	747	1.6
2018	21.6	3.9	8	3.5	560	1.0
2019	21.6	--	11	5.2	1,510	2.2
Moderate						
2017	16.9	13.5	9	9.4	1,521	3.2
2018	16.9	15.3	31	13.5	3,904	6.8
2019	16.9	--	24	11.4	4,075	5.8
Middle						
2017	20.0	24.2	20	20.8	4,501	9.4
2018	20.0	24.0	48	20.9	7,597	13.3
2019	20.0	--	32	15.2	7,305	10.5
Upper						
2017	41.5	48.0	33	34.4	10,119	21.1
2018	41.5	46.1	116	50.4	31,724	55.4
2019	41.5	--	118	56.2	39,710	56.9
Not Available						
2017	0.0	11.1	29	30.2	31,048	64.8
2018	0.0	10.8	27	11.7	13,494	23.6
2019	0.0	--	25	11.9	17,172	24.6
Totals						
2017	100.0	100.0	96	100.0	47,935	100.0
2018	100.0	100.0	230	100.0	57,278	100.0
2019	100.0	--	210	100.0	69,771	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the distribution of small farm loans reflects good penetration among farms of different sizes. CB's performance was significantly above the aggregate in 2017 and declined in 2018, but still remained above the performance of other lenders. The bank's performance was below D&B data; however, examiners relied on comparisons to aggregate performance to help ascertain actual loan demand in the AA.

Distribution of Small Farm Loans by Gross Annual Revenue Category						
Assessment Area: PVH AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	95.0	59.3	47	73.4	9,994	65.4
2018	95.0	54.9	36	60.0	7,523	51.2
2019	--	--	35	62.5	7,038	47.7
>1,000,000						
2017	3.4	--	17	26.6	5,282	34.6
2018	3.5	--	23	38.3	7,002	47.7
2019	--	--	21	37.5	7,717	52.3
Revenue Not Available						
2017	1.6	--	0	0.0	0	0.0
2018	1.6	--	1	1.7	160	1.1
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	64	100.0	15,276	100.0
2018	100.0	100.0	60	100.0	14,685	100.0
2019	--	--	56	100.0	14,755	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Community Development Loans

CB is a leader in originating CD loans in the PVH MSA. During the evaluation period, the bank originated 70 CD loans totaling \$126.4 million within the AA. Performance increased since the last examination, when CB made 23 loans totaling \$33.8 million in the AA.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 47 of these loans in the AA totaling \$87.9 million.

The majority of CD activities were directed towards economic development and affordable housing initiatives, identified community needs.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	2	1,208	-	-	1	1,154	-	-	3	2,362
2018	3	277	-	-	2	4,285	2	6,800	7	11,362
2019	10	20,424	-	-	1	1,443	2	2,973	13	24,840
YTD 2020	-	-	-	-	32	54,357	15	33,499	47	87,856
Total	15	21,909	-	-	36	61,239	19	43,272	70	126,420
<i>Source: Bank Data</i>										

Notable examples of CB's CD loans in the AA include the following:

- In 2019, CB funded a \$2 million loan for a 55-unit affordable housing complex serving LMI individuals. Affordable housing is a primary credit need within the AA.
- In 2019, CB funded a \$2.5 million loan for a community health group to support the purchase and remodel of clinics, and affordable housing projects benefiting LMI individuals.
- In 2018, CB financed a \$1.1 million SBA 504 loan for the construction of a dental office providing permanent job creation in the AA. Small business lending is also noted as a credit need within the AA.

INVESTMENT TEST

CB has an excellent level of qualified CD investments and donations in the PVH MSA, exhibits good responsiveness to credit and CD needs, and makes rare use of innovative and/or complex investments to support CD initiatives.

Investment and Grant Activity

CB has an excellent level of qualified investments in the AA, particularly those that are not routinely provided by private investors, often in a leadership position. The combined CD investments, both new and remaining from the prior period, including grants and donations, total

approximately \$42.0 million. The total amount of new CRA-qualified investments reported was approximately \$8.2 million. The institution also held approximately \$33.3 million in prior period investments and recorded approximately \$492,000 in grants and donations in the AA.

In addition to activity directly inside the AA, CB was also involved with 27 regional MBS investments for an allocated amount of approximately \$47.6 million that benefitted the AA. CB has a total of approximately \$89.6 million in qualified CD investments, considering current and prior period investments, regional investments that benefit the AA, and grants and donations. This level is a significant increase from the prior evaluation, when CB's qualified investments and donations totaled approximately \$42.3 million.

The following table details the qualified investments and donations made or held during the review period by year and CD type.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	6	32,472	1	577	-	-	1	244	8	33,293
2017	-	-	-	-	-	-	-	-	-	-
2018	1	8,188	-	-	-	-	-	-	1	8,188
2019	-	-	-	-	-	-	-	-	-	-
YTD 2020	-	-	-	-	-	-	-	-	-	-
Subtotal	7	40,660	1	577	-	-	1	244	9	41,481
Qualified Grants & Donations	18	115	93	268	14	109	-	-	125	492
Total	25	40,775	94	845	14	109	1	244	134	41,973
<i>Source: Bank Data</i>										

The following are notable examples of CD investments and donations extended in the AA:

- In the prior period, CB purchased a \$2.9 million school bond to improve facilities in school buildings throughout the district. The school district has a high poverty level and the majority of students enrolled are eligible for the free or reduced lunch program. The investment is still outstanding as of this evaluation date.
- During the evaluation period, CB provided 6 donations totaling \$110,000 to a community service organization that provides financial education classes to LMI adults and children throughout the AA.
- CB donated approximately \$51,000 to an organization that provides community services to LMI individuals in Clark County. The organization provides services such as emergency shelter for the homeless population, a hot meal program, and facilitation of an Individual Development Account Savings Program.

Responsiveness to Credit and Community Development Needs

The institution exhibits good responsiveness to credit and CD needs of the AA. The emphasis on affordable housing investments is responsive to a need in the area for affordable housing for LMI individuals.

Community Development Initiatives

CB makes rare use of innovative and/or complex investments to support CD initiatives. The institution's qualified investments are useful and help promote CD; however, they are not considered innovative as the investments held during the review period are school bonds, municipal bonds, and MBS.

SERVICE TEST

CB is rated "Outstanding" in the Service Test in the PVH AA.

Accessibility of Delivery Systems

Services, including business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at each of the branches throughout the PVH MSA. Branch locations have generally similar weekday hours that vary slightly according to AA needs. Typical hours are from 9:00 am to 5:00 pm Monday to Thursday with extended hours on Fridays. Service delivery systems are accessible to geographies and individuals of different income levels in its AAs.

Changes in Branch Locations

To the extent changes have been made, the institution's closing of branches has generally not adversely affected the accessibility of its delivery system, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, CB closed five branches, one located in a moderate-income CT and the remaining four located in middle-income tracts. CB maintains branches in close proximity to the closed branches.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. All branches offer the same products, including deposit accounts, Health Savings Accounts, business and consumer loan products, and applications for mortgage and consumer loans as well as credit cards. Business hours vary slightly by branch according to AA needs, with most locations offering extended Friday hours.

Community Development Services

The institution is a leader in providing CD services in the PVH AA. During the evaluation period, officers and employees provided 4,869 hours of qualified CD services. Service hours increased from the prior evaluation, when CB employees provided 856 hours to the AA. The majority of services provided by the bank consisted of activities that provided various community services targeted to LMI individuals and families, an identified AA CD need.

The following table details the institution's CD services for each year of the evaluation period by year and type of services provided.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
2017	207	443	111	-	761
2018	396	720	910	-	2,026
2019	356	759	728	116	1,959
YTD 2020	43	38	3	39	123
Total	1,002	1,960	1,752	155	4,869
<i>Source: Bank Records 3/31/2017 to 5/4/2020</i>					

Below are examples of CD Services provided by bank employees:

- In 2020, employees volunteered with a community organization work to help LMI individuals become economically self-sufficient through job training, support services, and job placement.
- In 2019, employees volunteered with a nonprofit in the AA that helps LMI achieve housing stability and build financial security.
- In 2018, employees volunteered with a community service group to provide low- and no-cost medical and dental care to uninsured and underserved LMI families in the AA.

IDAHO

CRA RATING FOR IDAHO: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IDAHO

CB has four AAs delineated for the State of Idaho; see the following table. The institution has not made any changes to the Idaho AAs during the review period. Refer to individual AAs for key demographic and economic information specific to each.

SCOPE OF EVALUATION – IDAHO

Refer to the Scope of Evaluation section for the institution for details regarding the review for the State of Idaho. The Idaho Non-MSA was selected for review using full-scope procedures based on the lending activity, deposit volume, and branch distribution. The Non-MSA received the most weight for determining overall performance conclusions. The remaining Idaho AAs were evaluated using limited-scope procedures and consist of the following: Boise MSA, Coeur D'Alene, and Twin Falls MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN IDAHO

LENDING TEST

CB is rated "Low Satisfactory" in the Lending Test in the State of Idaho. The institution's performance is below that of the bank's overall performance. Details are provided in each full- or limited-scope analysis.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. The institution's performance varies somewhat by AA. Refer to each respective analysis for details.

Geographic Distribution

CB's geographic distribution of loans reflects adequate penetration throughout its AAs. The performance among the individual AAs was generally consistent, with the exception of the Coeur d'Alene AA, which reflected good penetration throughout the AA. Small business lending performance in the Idaho Non-MSA provided the most weight in developing conclusions. Refer to each respective full- or limited-scope analysis for details.

Borrower Profile

CB's distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different size. The bank's performance in the individual AAs was consistent with this conclusion with the

exception of the Twin Falls MSA, which was above the other areas and reflects good penetration. CB's performance of small business lending in the Idaho Non-MSA was most heavily weighted for developing performance conclusions. Details regarding variances in individual AA performance are discussed in each respective analysis.

Community Development Loans

CB originated a relatively high level of CD loans in the Idaho AAs. During the evaluation period, the bank originated 13 CD loans totaling \$51.2 million within the Idaho AAs. Performance increased since the last examination, when CB made 11 loans totaling \$37.6 million in the State of Idaho.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 4 of these loans in the State of Idaho AAs totaling \$11.7 million.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Idaho Non-MSA	-	-	-	-	3	10,108	2	4,091	5	14,199
Boise MSA	1	7,394	-	-	2	5,532	-	-	3	12,926
Coeur D’Alene MSA	3	23,764	-	-	-	-	-	-	3	23,764
Twin Falls MSA	-	-	-	-	-	-	-	-	-	-
Statewide Activities	2	293	-	-	-	-	-	-	2	293
Total	6	31,451	-	-	5	15,640	2	4,091	13	51,182
Source: Bank Data										

INVESTMENT TEST

CB is rated “Outstanding” in the Investment Test for the State of Idaho. The performance in the Idaho Non-MSA AA, Boise AA, and Coeur d’Alene MSA AA are consistent with the State of Idaho performance, while the Twin Falls MSA AA performance is below that of the State of Idaho performance.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and donations throughout the Idaho AAs, particularly those not routinely provided by private investors, often in a leadership position. CB reported 102 qualified investments and donations totaling approximately \$20.2 million during the evaluation period. The total amount of CRA-qualified investments reported are attributed to investments made prior to the evaluation date that are still outstanding. The institution also recorded approximately \$136,000 in grants and donations in the state. In addition to activity inside the AAs reflected in the below table, CB was also involved with 20 regional MBS investments for an allocated amount of approximately \$11.9 million that benefitted portions of the state that included the institution’s AAs.

CB has a total of approximately \$32.1 million in qualified CD investments, considering current and prior period investments, regional investments that benefit Idaho AAs, and grants and donations. This level is a significant increase from the last evaluation, when CB’s qualified investments and donations, including regional investments benefitting the Idaho AAs, totaled approximately \$11.7 million. The institution was able to penetrate all of its AAs in the state with donation activity, and all of the AAs in the state with investments activity, when regional investments that benefit the AAs are considered.

The following table lists the qualified CD investments and donations activity by area and CD category.

Community Development Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Idaho Non-MSA	-	-	3	1,616	-	-	-	-	3	1,616
Boise MSA	-	-	8	3,823	-	-	-	-	8	3,823
Coeur D’Alene MSA	-	-	-	-	-	-	-	-	-	-
Twin Falls MSA	-	-	-	-	-	-	-	-	-	-
Statewide Activities	4	8,783	5	5,807	-	-	-	-	9	14,590
Subtotal	4	8,783	16	11,246	-	-	-	-	20	20,029
Qualified Grants & Donations	2	1	66	69	13	65	1	1	82	136
Total	6	8,784	82	11,315	13	65	1	1	102	20,165
<i>Source: Bank Data</i>										

Community services targeted towards LMI individuals received the majority of the qualified investments with approximately \$11.2 million, which includes 12 prior period investments totaling

approximately \$5.9 million that are still active. Refer to the full-scope AA analysis for further details and notable examples of qualified investments and donations.

Responsiveness to Credit and Community Development Needs

The institution exhibits adequate responsiveness to credit and CD needs of the Idaho AAs. The institution provided investments and donations focusing on affordable housing and community services for LMI individuals in the Idaho AAs; however, a community contact in Idaho also mentioned a need for supporting economic development throughout the state as well.

Community Development Initiatives

CB makes rare use of innovative and/or complex investments to support CD initiatives. The institution's qualified investments are useful and help promote CD; however, they are not considered innovative or complex.

SERVICE TEST

CB is rated "High Satisfactory" in the Service Test in the State of Idaho. While performance is consistent in the Idaho Non-MSA, Boise MSA, and Coeur D'Alene MSA AAs, weaker performance is noted in the Twin Falls MSA AA.

Accessibility of Delivery Systems

Consistent with overall conclusions, delivery systems are accessible to geographies and individuals of different income levels in its AAs. CB operates 14 full-service branches located throughout the bank's Idaho AAs. One branch is located in a low-income CT, five are located in moderate-income CTs, and the remaining eight are located in middle-income CTs. Refer to each full- and limited-scope analysis for additional details regarding accessibility of delivery systems.

Changes in Branch Locations

CB did not open or close any branches in the Idaho AAs during the evaluation period; therefore, this criterion did not affect conclusions for the state.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at each of the branches throughout the State of Idaho. Branch locations have generally similar weekday hours that vary slightly according to AA needs. Typical hours are from 9:00 am to 5:00 pm with some branches offering extended hours on Fridays. One of the 14 branch locations in the State of Idaho offers Saturday hours. Refer to each full- and limited-scope analysis for additional details.

Community Development Services

The institution provides an adequate level of CD services in the State of Idaho. During the review period, CB officers and employees provided 2,087 hours of qualified CD services to organizations within the Idaho AAs. Service hours increased from the prior evaluation, where CB employees provided 728 hours of service to qualified CD organizations within Idaho.

The table following indicates that the majority of service hours were provided in the Idaho Non-MSA AA, where CB employees provided 1,234 hours of service to qualified CD organizations. At 1,757 hours, the majority of service hours provided in Idaho supported the provision of community services targeted to LMI individuals and families. CB employees also provided statewide services totaling 376 hours during the evaluation period. Refer to each full- and limited-scope analysis for specific details and examples of qualified service activities, where relevant.

Community Development Services by Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
Idaho Non-MSA	40	1,109	83	2	1,234
Boise MSA	6	189	36	-	231
Coeur D’Alene MSA	-	177	53	-	230
Twin Falls MSA	-	16	-	-	16
Statewide Activities	58	266	52	-	376
Total	104	1,757	224	2	2,087
<i>Source: Bank Records 3/31/2017 to 5/4/2020</i>					

IDAHO NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN IDAHO NON-MSA AA

The Idaho Non-MSA AA consists of all 23 CTs in Boundary, Bonner, Gooding, Payette, Shoshone, and Washington Counties. CB has not made any changes to the AA since the previous evaluation.

Economic and Demographic Data

According to the 2015 ACS Census, the Idaho Non-MSA AA contained 2 moderate- and 21 middle-income CTs. Additional demographic data is in the table below.

Demographic Information of the Assessment Area						
Assessment Area: ID Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	8.7	91.3	0.0	0.0
Population by Geography	112,556	0.0	7.1	92.9	0.0	0.0
Housing Units by Geography	56,431	0.0	6.4	93.6	0.0	0.0
Owner-Occupied Units by Geography	32,131	0.0	7.2	92.8	0.0	0.0
Occupied Rental Units by Geography	12,325	0.0	6.0	94.0	0.0	0.0
Vacant Units by Geography	11,975	0.0	4.9	95.1	0.0	0.0
Businesses by Geography	7,858	0.0	2.9	97.1	0.0	0.0
Farms by Geography	753	0.0	1.6	98.4	0.0	0.0
Family Distribution by Income Level	29,656	20.4	19.3	22.3	38.0	0.0
Household Distribution by Income Level	44,456	25.9	17.5	18.1	38.5	0.0
Median Family Income Non-MSAs - ID		\$52,867	Median Housing Value			\$171,341
			Median Gross Rent			\$697
			Families Below Poverty Level			12.4%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Competition

The FDIC's June 2019 Deposit Market Share Report shows that CB ranks 1st out of 13 FDIC-insured institutions competing within the AA, with a total of 21.6 percent of the deposit market share. According to the same data, the bank has 8 out of 42 branches in the AA. Three of the most prominent lenders accounted for a total of 55.6 percent of the total market share.

Community Contacts

Examiners reviewed information from a recent community contact within the FFIEC's database. The contact is a representative of an organization that supports small businesses, small farms, and LMI individuals throughout southern Idaho through a variety of CD programs. The contact described the local economy as healthy, citing decreasing unemployment rates, increasing job training opportunities, and a low cost of living. The contact noted that the number of financial institutions has increased in the market with the addition of several credit unions. The contact stated financial institutions meet most needs in the market and are generally involved with the local community, but noted that a need exists for small consumer loans with flexible terms.

Examiners also interviewed a community contact from an organization that assists LMI individuals throughout southern Idaho with affordable housing through down payment and rental assistance programs. The contact described the local housing market as difficult, due to housing demand outweighing supply.

Credit and Community Development Needs and Opportunities

Examiners determined that small business and affordable housing loans are a primary credit need in the AA based on information from bank management, community contacts, and economic and demographic data. Funds for small business start-ups and working capital are in demand, with opportunities for financial institutions to participate by providing additional resources to organizations that provide assistance to small businesses. Additionally, affordable housing is in high demand, with opportunities for financial institutions to participate by providing additional resources to organizations providing housing assistance to LMI individuals.

CONCLUSIONS ON PERFORMANCE CRITERIA IN IDAHO NON-MSA AA

LENDING TEST

CB's Lending Test performance in the Idaho Non-MSA AA is consistent with overall Lending Test conclusions for the State of Idaho.

Lending Activity

CB's lending levels reflect good responsiveness to AA credit needs. During 2017, 2018, and 2019, CB originated 310 small business loans totaling approximately \$64.9 million, 174 home mortgage loans totaling \$29.9 million, and 118 small farm loans totaling \$16.3 million. Lending increased for each product since the previous examination, where CB originated 250 small business loans totaling \$43.2 million, 141 home mortgage loans totaling \$32.3 million, and 115 small farm loans totaling \$16.3 million. It's important to note that the review period for the last examination included loan data from only 2015 and 2016, the two-year period from the CB's acquisition of Intermountain Bancorp, where the institution entered into the State of Idaho market.

In 2017, CB ranked 21st out of 194 lenders who reported a total of 3,761 originated or purchased home mortgage loans, giving the bank a market share of 1.3 percent. Three of the most prominent lenders accounted for a total of 20.1 percent of the total market share by number. In 2018, CB ranked 23rd out of 282 lenders who reported a total of 15,172 originated or purchased home mortgage loans, giving the bank a market share of 1.3 percent. Three of the most prominent lenders accounted for a total of 20.8 percent of the total market share by number.

In 2017, CB ranked 8th out of 54 lenders who reported a total of 2,365 originated or purchased small business loans, giving the bank a market share of 4.2 percent by number and 17.2 percent by dollar volume. Three of the most prominent lenders accounted for a total of 40.3 percent of the total market share by number. In 2018, CB ranked 8th out of 54 lenders who reported a total of 2,510 originated or purchased small business loans, giving the bank a market share of 4.4 percent by number and 24.0 percent by dollar volume. Three of the most prominent lenders accounted for a total of 41.7 percent of the total market share by number.

In 2017, CB ranked 5th out of 16 lenders who reported a total of 326 originated or purchased small farm loans, giving the bank a market share of 11.4 percent by number and 19.4 percent by dollar volume. Three of the most prominent lenders accounted for a total of 50.3 percent of the total market share by number. In 2018, CB ranked 5th out of 13 lenders who reported a total of 311 originated or purchased small farm loans, giving the bank a market share of 11.9 percent by number and 21.8 percent by dollar volume. Three of the most prominent lenders accounted for a total of 46.0 percent of the total market share by number.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. Adequate performance in small business, home mortgage, and small farm lending supports this conclusion. The AA does not include any low-income geographies; therefore, examiners limited the analysis of the bank's lending performance to moderate-income tracts.

Small Business Loans

The following table shows the geographic distribution of small business loans reflects adequate penetration throughout the AA. The bank's performance of lending in moderate-income tracts was slightly below D&B data and aggregate performance in 2017, but improved in 2018, and exceeded both comparators to a large degree. In 2019, CB's performance declined, but not an unreasonable amount.

Geographic Distribution of Small Business Loans						
Assessment Area: ID Non-MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	2.8	2.7	1	1.0	100	0.6
2018	2.9	3.2	8	7.2	1,967	7.3
2019	--	--	4	4.0	1,011	4.8
Middle						
2017	97.2	97.3	98	99.0	16,829	99.4
2018	97.1	96.8	103	92.8	24,865	92.7
2019	--	--	96	96.0	20,204	95.2
Upper						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	99	100.0	16,929	100.0
2018	100.0	100.0	111	100.0	26,832	100.0
2019	--	--	100	100.0	21,215	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. Moderate-income tract lending performance was above demographic data and consistent with aggregate performance in 2017. In 2018, CB did not originate any loans in moderate-income tracts in 2018, but showed significant improvement in 2019, indicating adequate performance. See the following table.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: ID Non-MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Moderate						
2017	3.2	4.0	2	4.3	242	2.5
2018	3.2	2.9	0	0.0	0	0.0
2019	7.2	--	13	19.1	2,030	16.2
Middle						
2017	96.8	96.0	45	95.7	9,329	97.5
2018	96.8	97.2	59	100.0	7,823	100.0
2019	92.8	--	55	80.9	10,507	83.8
Upper						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	47	100.0	9,571	100.0
2018	100.0	100.0	59	100.0	7,823	100.0
2019	100.0	--	68	100.0	12,537	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

The following table shows the geographic distribution of small business loans reflects adequate penetration throughout the AA. CB did not originate any small farm loans in 2017 or 2018 in moderate-income tracts during the review period, but D&B data and aggregate performance demonstrate a low level of opportunity for small farm lending in the AA. In 2019, the bank's performance improved to an adequate level.

Geographic Distribution of Small Farm Loans						
Assessment Area: ID Non-MSA AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Moderate						
2017	2.1	0.6	0	0.0	0	0.0
2018	1.6	1.3	0	0.0	0	0.0
2019	--	--	1	2.3	120	1.8
Middle						
2017	97.9	99.4	37	100.0	4,861	100.0
2018	98.4	98.7	37	100.0	4,863	100.0
2019	--	--	43	97.7	6,460	98.2
Upper						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Not Available						
2017	0.0	0.0	0	0.0	0	0.0
2018	0.0	0.0	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	37	100.0	4,861	100.0
2018	100.0	100.0	37	100.0	4,863	100.0
2019	--	--	44	100.0	6,580	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and businesses and farms of different sizes. This conclusion is supported by the bank's adequate small business lending performance, good home mortgage lending and adequate small farm lending performance.

Small Business Loans

As shown in the following table, the distribution of small business loans reflects adequate distribution among businesses of different sizes. CB's performance was below D&B data during the review period, but remained stable and consistent with aggregate performance during the same period of time.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: ID Non-MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	84.8	55.7	56	56.6	4,908	29.0
2018	84.9	54.7	56	50.5	9,271	34.6
2019	--	--	56	56.0	7,877	37.1
>1,000,000						
2017	4.3	--	40	40.4	11,961	70.7
2018	4.1	--	54	48.6	17,466	65.1
2019	--	--	44	44.0	13,338	62.9
Revenue Not Available						
2017	10.9	--	3	3.0	60	0.4
2018	11.0	--	1	0.9	95	0.4
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	99	100.0	16,929	100.0
2018	100.0	100.0	111	100.0	26,832	100.0
2019	--	--	100	100.0	21,215	100.0
<i>Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>						

Home Mortgage Loans

The bank's distribution of home mortgage lending reflects good penetration to LMI borrowers. CB's performance of lending to low-income borrowers was below demographic data throughout the review period, but was generally consistent with aggregate performance during the same time period. In moderate-income tracts the bank's performance was slightly below demographic data, but similar to aggregate performance and trended upward during the review period. See the following table.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: ID Non-MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2017	20.3	6.4	3	6.4	254	2.7
2018	20.4	5.2	6	10.2	367	4.7
2019	20.4	--	2	2.9	55	0.4
Moderate						
2017	19.2	17.4	13	27.7	1,433	15.0
2018	19.3	15.7	14	23.7	1,375	17.6
2019	19.3	--	14	20.6	1,833	14.6
Middle						
2017	22.3	22.3	12	25.5	1,825	19.1
2018	22.3	22.2	11	18.6	1,542	19.7
2019	22.3	--	7	10.3	858	6.8
Upper						
2017	38.2	40.4	17	36.2	4,174	43.6
2018	38.0	46.3	28	47.5	4,539	58.0
2019	38.0	--	42	61.8	9,497	75.8
Not Available						
2017	0.0	13.5	2	4.3	1,885	19.7
2018	0.0	10.7	0	0.0	0	0.0
2019	0.0	--	3	4.4	295	2.4
Totals						
2017	100.0	100.0	47	100.0	9,571	100.0
2018	100.0	100.0	59	100.0	7,823	100.0
2019	100.0	--	68	100.0	12,537	100.0
Source: 2015 ACS Census; 1/1/2017 - 12/31/2019 Bank Data, 2017 & 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0						

Small Farm Loans

As shown in the following table, the distribution of small business loans reflects good distribution among businesses of different sizes. CB's performance was below D&B data during the review period, but exceeded that of aggregate lenders by a large degree, indicating good performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category						
Assessment Area: ID Non-MSA AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2017	94.9	61.5	33	89.2	3,696	76.0
2018	94.0	59.6	32	86.5	3,621	74.5
2019	--	--	40	90.9	5,627	85.5
>1,000,000						
2017	3.4	--	4	10.8	1,165	24.0
2018	3.7	--	5	13.5	1,242	25.5
2019	--	--	4	9.1	953	14.5
Revenue Not Available						
2017	1.7	--	0	0.0	0	0.0
2018	2.3	--	0	0.0	0	0.0
2019	--	--	0	0.0	0	0.0
Totals						
2017	100.0	100.0	37	100.0	4,861	100.0
2018	100.0	100.0	37	100.0	4,863	100.0
2019	--	--	44	100.0	6,580	100.0
Source: 2017 & 2018 D&B Data; 1/1/2017 - 12/31/2019 Bank Data; 2017 & 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0						

Community Development Loans

CB made a relatively high number of CD loans in the Idaho Non-MSA AA, originating 5 loans totaling \$14.2 million during the evaluation period. CD lending increased by number and dollar since the last examination, where CB originated 4 CD loan totaling \$10.4 million. As seen in the table below, the majority of CD loans targeted Economic Development initiatives.

CD lending includes qualified loans originated under the PPP in response to the COVID-19 pandemic. CB originated 4 of these loans in the Idaho Non-MSA AA totaling \$11.7 million.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	1	2,540	1	2,540
2019	-	-	-	-	-	-	-	-	-	-
YTD 2020	-	-	-	-	3	10,108	1	1,551	4	11,659
Total	-	-	-	-	3	10,108	2	4,091	5	14,199

Source: Bank Data

A notable example of CB's CD loan in the AA include the following:

- In 2018, CB funded a \$2.5 million revitalization loan in the AA for a sewer improvement project benefiting distress and underserved populations.

INVESTMENT TEST

CB has an excellent level of qualified CD investments and donations in the Idaho Non-MSA AA, exhibits adequate responsiveness to credit and CD needs, and makes rare use of innovative and/or complex investments to support CD initiatives.

Investment and Grant Activity

CB has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position in the AA. The combined CD investments, both new and remaining from the prior period, including grants and donations, total approximately \$1.6 million, all of which are prior period investments that are still outstanding as of this evaluation date. The institution also recorded approximately \$29,000 in grants and donations in the AA.

In addition to activity directly inside the AA, CB was also involved with 15 regional MBS investments for an allocated amount of approximately \$5.0 million that benefitted the Idaho Non-MSA AA. CB has a total of approximately \$6.7 million in qualified CD investments in the AA, considering current and prior period investments, regional investments that benefit the AA, and grants and donations. This level is a large increase from the last evaluation, when CB's qualified investments and donations totaled approximately \$3.5 million.

The following table details the qualified investments and donations made or held during the review period by year and CD type.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	3	1,616	-	-	-	-	3	1,616
2017	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
YTD 2020	-	-	-	-	-	-	-	-	-	-
Subtotal	-	-	3	1,616	-	-	-	-	3	1,616
Qualified Grants & Donations	-	-	46	19	5	10	-	-	51	29
Total	-	-	49	1,635	5	10	-	-	54	1,645
<i>Source: Bank Data</i>										

The following are notable examples of qualified investments and CD donations extended in the AA:

- In the prior period, CB purchased two school bonds totaling \$1.3 million that will allow the district to construct a new elementary school and remodel an existing high school. The school district has a high poverty level and the majority of students enrolled are eligible for the free or reduced lunch program. The investment is still outstanding as of this evaluation date.
- During the evaluation period, CB made three donations totaling \$9,000 to an economic development organization in the AA. The organization provides various services for small businesses in Northern Idaho, including workforce training and assistance with seeking small business loans.
- Over the evaluation period, CB donated approximately \$4,700 to a food bank in Bonner County. In addition to providing food assistance to LMI individuals and families in the area, the organization also provides additional essential community services on an as-needed basis.

Responsiveness to Credit and Community Development Needs

CB exhibits adequate responsiveness to credit and CD needs. The institution provided investments and donations focusing on community services and had regional investments in the AA that focused on affordable housing for LMI individuals. These investments and donations provided assistance for those living in poverty throughout the AA; however, a community contact also stated a need for economic development throughout the AA.

Community Development Initiatives

The institution makes rare use of innovative and/or complex investments to support CD initiatives. The institution's qualified investments are useful and help promote CD, but are not considered

innovative as the investments held and purchased by the institution during the review period consist of school bonds and MBS.

SERVICE TEST

CB's Service Test performance in the Idaho Non-MSA AA is consistent with overall conclusions for the State of Idaho.

Accessibility of Delivery Systems

Service delivery systems are accessible to geographies and individuals of different income levels in its AAs. CB operates eight full-service branches in the AA. There are no low-income CTs within the Idaho Non-MSA AA. One branch, accounting for 12.5 percent of the bank's branch presence in the AA, is located in a moderate-income CT, compared to 7 percent of all other institution's branches operating in the AA. The remaining seven branches are located in middle-income CTs.

Changes in Branch Locations

During the evaluation period, the bank did not open or close any branches in the Idaho Non-MSA AA; as such, this criterion did not affect conclusions for the AA.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Products and services are similar in the Idaho Non-MSA AA as those discussed in the Service Test portion for the State of Idaho. One of the eight branches in the AA offer drive-up hours on Saturday.

Community Development Services

The institution provides an adequate level of CD services in the Idaho Non-MSA AA. During the evaluation period, officers and employee provided 1,234 hours of qualified CD services. Service hours increased from the prior evaluation, where CB employees provided 463 hours to the AA. The majority of services provided by the bank consisted of activities that provided various community services targeted to LMI individuals and families and organizations that promote economic development in the AA; see the following table.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# of Hours	# of Hours	# of Hours	# of Hours	# of Hours
2017	-	241	-	-	241
2018	34	429	29	-	492
=2019	6	354	54	2	416
YTD 2020	-	85	-	-	85
Total	40	1,109	83	2	1,234
<i>Source: Bank Records 3/31/2017 to 5/4/2020</i>					

Below are examples of CD services provided by bank employees:

- In 2020, employees volunteered with a community resource group in the AA that provides support, temporary shelter, and crisis intervention among other services to LMI individuals who have been victims of assault, abuse, or sexual violence.

In 2019, employees volunteered with an organization providing structure and guidance to support communities that need to build and repair homes for LMI individuals.

- In 2017 employees volunteered with a community organization in the AA that provides support to LMI children in crisis by providing secure homes that support emotional, physical, and mental well-being.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Idaho AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information.

The conclusions from the areas reviewed using limited-scope procedures did/did not impact/alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Boise MSA	Consistent	Consistent	Consistent
Coeur d'Alene MSA	Consistent	Consistent	Consistent
Twin Falls MSA	Consistent	Below	Below

Boise MSA

The institution operates two branches in the AA: one in a low-income CT and one in a moderate-income CT.

Activity	#	\$
Small Business Loans	127	\$27.1 million
HMDA Loans	36	\$14.2 million
Small Farm Loans	162	\$24.6 million
CD Loans	3	\$12.9 million
Investments (New)	4	\$1.1 million
Investments (Prior Period)	9	\$4.0 million
Donations	20	\$70,194
CD Services	231 hours	

Coeur d'Alene MSA

The institution operates three branches in the AA: two in moderate-income CTs and one in a middle-income CT.

Activity	#	\$
Small Business Loans	173	\$46.0 million
HMDA Loans	99	\$33.7 million
Small Farm Loans	3	\$270,000
CD Loans	3	\$23.8 million
Investments (New)	4	\$2.1 million
Investments (Prior Period)	3	\$1.3 million
Donations	5	\$32,600
CD Services	230 hours	

Twin Falls MSA

The institution operates one branch in the AA which is located in a moderate-income CT.

Activity	#	\$
Small Business Loans	33	\$7.9 million
HMDA Loans	11	\$1.8 million
Small Farm Loans	35	\$3.9 million
CD Loans	-	-
Investments (New)	6	\$1.9 million
Investments (Prior Period)	1	\$377,177
Donations	6	\$3,150
CD Services	16 hours	

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving LMI individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in LMI geographies and individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

Columbia State Bank	
Scope of Examination: Full scope reviews were performed on the following assessment areas within the noted rated areas: State of Washington: Seattle CSA Assessment Area Kennewick-Walla Walla CSA Assessment Area State of Oregon: Oregon Non-MSA Assessment Area PVH MSA State of Idaho: Idaho Non-MSA Assessment Area	
Time Period Reviewed:	03/30/2017 – 12/31/2019
Products Reviewed: Home Mortgage: 01/01/2017 – 12/31/2019 Small Business: 01/01/2017 – 12/31/2019 Small Farm: 01/01/2017 – 12/31/2019	

List of Assessment Areas and Type of Evaluation			
Rated Area/ Assessment Area	Type of Evaluation	Branches Visited	Other Information
Washington:			
Seattle CSA	Full-scope	None	None
Kennewick-Walla Walla CSA	Full-scope	None	None
Bellingham MSA	Limited-scope	None	None
Lewiston MSA	Limited-scope	None	None
Longview MSA	Limited-Scope	None	None
Spokane MSA	Limited-Scope	None	None
Washington Non-MSA	Limited-Scope	None	None
Yakima MSA	Limited-Scope	None	None
Oregon:			
Oregon Non-MSA	Full-scope	None	None
Bend MSA	Limited-scope	None	None
Eugene-Springfield MSA	Limited-scope	None	None
Salem MSA	Limited-scope	None	None
PVH MSA	Full-scope	None	None
Idaho:			
Idaho Non-MSA	Full Scope	None	None
Boise MSA	Limited-Scope	None	None
Coeur D'Alene MSA	Limited-Scope	None	None
Twin Falls MSA	Limited-Scope	None	None

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Washington State	High Satisfactory	Outstanding	Outstanding	Outstanding
Oregon State	High Satisfactory	Outstanding	Outstanding	Outstanding
PVH MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Idaho State	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

WASHINGTON STATE

Washington Non-MSA

The Washington Non-MSA AA consists of Adams, Grant, Klickitat, and Whitman counties. According to the 2015 ACS Census, the AA comprises 3 low-, 4 moderate-, 21 middle-, and 6 upper-income tracts. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: WA Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	8.8	11.8	61.8	17.6	0.0
Population by Geography	178,708	8.6	16.8	56.8	17.7	0.0
Housing Units by Geography	71,264	4.8	14.5	60.9	19.8	0.0
Owner-Occupied Units by Geography	35,290	1.3	8.7	67.9	22.1	0.0
Occupied Rental Units by Geography	26,132	10.2	21.5	50.3	18.0	0.0
Vacant Units by Geography	9,842	2.9	16.7	63.9	16.5	0.0
Businesses by Geography	8,633	4.1	9.7	64.9	21.3	0.0
Farms by Geography	1,666	0.6	12.7	69.6	17.1	0.0
Family Distribution by Income Level	40,541	22.1	18.6	21.1	38.1	0.0
Household Distribution by Income Level	61,422	25.7	17.1	17.0	40.3	0.0
Median Family Income Non-MSAs - WA		\$58,240	Median Housing Value			\$173,436
			Median Gross Rent			\$717
			Families Below Poverty Level			12.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Spokane MSA

The Spokane MSA AA #44060 consists of Spokane County, which represents a portion of the Spokane-Spokane Valley MSA. According to the 2015 ACS Census, the AA comprises 1 low-, 63 moderate-, 18 middle-, and 23 upper-income tracts. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Spokane AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.0	26.7	47.6	23.8	1.0
Population by Geography	480,832	0.6	25.0	44.8	28.8	0.9
Housing Units by Geography	205,487	0.6	26.2	44.4	27.5	1.4
Owner-Occupied Units by Geography	119,096	0.1	17.8	46.9	34.9	0.4
Occupied Rental Units by Geography	70,375	1.4	38.4	41.2	16.2	2.8
Vacant Units by Geography	16,016	0.6	35.1	40.1	21.6	2.6
Businesses by Geography	31,098	3.3	31.1	37.7	27.0	0.9
Farms by Geography	1,240	0.5	12.9	46.0	40.6	0.0
Family Distribution by Income Level	119,767	20.1	16.8	22.0	41.2	0.0
Household Distribution by Income Level	189,471	24.2	16.3	16.9	42.6	0.0
Median Family Income MSA - 44060 Spokane-Spokane Valley, WA MSA		\$62,064	Median Housing Value			\$190,889
			Median Gross Rent			\$786
			Families Below Poverty Level			10.3%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Yakima MSA

The Yakima MSA AA #49420 consists of Yakima County. According to the 2015 ACS Census, the AA comprises 13 moderate-, 19 middle-, and 13 upper-income tracts. There are no tracts designated as low-income. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Yakima AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.0	28.9	42.2	28.9	0.0
Population by Geography	247,408	0.0	28.5	42.6	28.9	0.0
Housing Units by Geography	86,208	0.0	23.9	42.3	33.8	0.0
Owner-Occupied Units by Geography	49,969	0.0	17.6	41.2	41.3	0.0
Occupied Rental Units by Geography	30,003	0.0	35.1	45.0	19.9	0.0
Vacant Units by Geography	6,236	0.0	20.0	38.7	41.3	0.0
Businesses by Geography	11,023	0.0	29.0	39.3	31.7	0.0
Farms by Geography	1,134	0.0	8.1	56.2	35.7	0.0
Family Distribution by Income Level	57,541	20.2	18.1	20.6	41.1	0.0
Household Distribution by Income Level	79,972	22.0	17.4	19.5	41.1	0.0
Median Family Income MSA - 49420 Yakima, WA MSA		\$49,907	Median Housing Value			\$154,614
			Median Gross Rent			\$787
			Families Below Poverty Level			16.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Longview MSA

The Longview MSA AA #31020 consists of Cowlitz County. According to the 2015 ACS Census, the AA comprises 4 low-, 3 moderate-, 12 middle-, and 5 upper-income tracts. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Longview AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	16.7	12.5	50.0	20.8	0.0
Population by Geography	102,338	10.8	12.7	46.8	29.7	0.0
Housing Units by Geography	43,503	10.8	12.6	48.0	28.6	0.0
Owner-Occupied Units by Geography	26,091	4.3	9.0	50.3	36.3	0.0
Occupied Rental Units by Geography	13,672	22.8	19.6	41.5	16.2	0.0
Vacant Units by Geography	3,740	12.5	12.0	55.4	20.1	0.0
Businesses by Geography	5,289	28.9	7.7	40.9	22.4	0.0
Farms by Geography	195	19.5	5.6	46.7	28.2	0.0
Family Distribution by Income Level	26,082	20.6	18.1	21.7	39.6	0.0
Household Distribution by Income Level	39,763	24.7	15.8	17.8	41.8	0.0
Median Family Income MSA - 31020 Longview, WA MSA		\$57,938	Median Housing Value			\$175,712
			Median Gross Rent			\$766
			Families Below Poverty Level			12.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Bellingham MSA

The Bellingham MSA AA #13380 consists of Whatcom County. According to the 2015 ACS Census, the AA comprises 1 low-, 2 moderate-, 25 middle-, and 5 upper-income tracts. One tract has no income designation. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Bellingham AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	2.9	5.9	73.5	14.7	2.9
Population by Geography	207,100	3.4	7.5	74.3	14.0	0.8
Housing Units by Geography	91,911	3.5	6.7	74.8	14.0	1.0
Owner-Occupied Units by Geography	50,359	1.0	4.1	77.8	17.0	0.1
Occupied Rental Units by Geography	29,408	8.5	13.1	65.0	10.7	2.6
Vacant Units by Geography	12,144	1.8	1.8	85.8	9.7	0.9
Businesses by Geography	17,923	1.6	5.4	72.8	14.7	5.5
Farms by Geography	949	1.3	2.4	81.8	14.3	0.2
Family Distribution by Income Level	49,259	20.8	17.1	22.5	39.6	0.0
Household Distribution by Income Level	79,767	25.4	15.8	17.0	41.9	0.0
Median Family Income MSA - 13380 Bellingham, WA MSA		\$68,376	Median Housing Value			\$276,439
			Median Gross Rent			\$938
			Families Below Poverty Level			10.1%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Lewiston MSA

The Lewiston ID-WA Multistate AA #30300 consists of only Asotin County in the State of Washington. According to the 2015 ACS Census, the AA comprises 2 moderate-, 3 middle-, and 1 upper-income tracts. One tract has no income designation. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Lewiston AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	33.3	50.0	16.7	0.0
Population by Geography	22,040	0.0	25.2	55.5	19.3	0.0
Housing Units by Geography	9,855	0.0	26.9	53.7	19.4	0.0
Owner-Occupied Units by Geography	6,259	0.0	21.4	55.7	22.9	0.0
Occupied Rental Units by Geography	3,082	0.0	37.3	54.1	8.6	0.0
Vacant Units by Geography	514	0.0	32.3	27.2	40.5	0.0
Businesses by Geography	1,138	0.0	39.9	45.1	15.0	0.0
Farms by Geography	80	0.0	13.8	41.3	45.0	0.0
Family Distribution by Income Level	6,035	20.4	21.3	22.0	36.4	0.0
Household Distribution by Income Level	9,341	25.4	17.9	17.5	39.2	0.0
Median Family Income MSA - 30300 Lewiston, ID-WA MSA		\$58,484	Median Housing Value			\$173,005
			Median Gross Rent			\$702
			Families Below Poverty Level			10.0%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

OREGON STATE

Bend MSA

The Bend MSA AA #13460 consists of Deschutes County. According to the 2015 ACS Census, the AA contains no low-income tracts. The AA is comprised of 6 moderate-, 13 middle-, and 5 upper-income tracts. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Bend AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	25.0	54.2	20.8	0.0
Population by Geography	166,622	0.0	23.5	57.2	19.3	0.0
Housing Units by Geography	81,773	0.0	25.1	57.5	17.4	0.0
Owner-Occupied Units by Geography	42,919	0.0	19.1	59.1	21.8	0.0
Occupied Rental Units by Geography	23,418	0.0	38.3	47.6	14.1	0.0
Vacant Units by Geography	15,436	0.0	22.0	68.1	10.0	0.0
Businesses by Geography	18,362	0.0	32.8	42.6	24.6	0.0
Farms by Geography	723	0.0	19.5	61.4	19.1	0.0
Family Distribution by Income Level	44,349	21.7	18.7	19.8	39.8	0.0
Household Distribution by Income Level	66,337	23.7	16.7	16.7	42.8	0.0
Median Family Income MSA - 13460 Bend, OR MSA		\$62,013	Median Housing Value			\$268,625
			Median Gross Rent			\$975
			Families Below Poverty Level			10.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Eugene MSA

The Eugene MSA AA consists of Lane County, which comprises the Eugene-Springfield MSA #21660 in its entirety. According to the 2015 ACS Census, the AA comprises 3 low-, 18 moderate-, 45 middle-, and 20 upper-income tracts. One tract has no income designation. There have been no changes to the AA since the last examination.

Table A – Demographic Information of the Assessment Area						
Assessment Area: CB Eugene AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	3.4	20.7	51.7	23.0	1.1
Population by Geography	357,060	4.5	20.3	53.5	21.7	0.0
Housing Units by Geography	157,510	4.6	21.1	54.4	19.9	0.0
Owner-Occupied Units by Geography	85,785	0.8	16.9	57.2	25.0	0.0
Occupied Rental Units by Geography	60,450	9.6	26.8	50.2	13.4	0.0
Vacant Units by Geography	11,275	6.6	22.2	55.2	16.0	0.0
Businesses by Geography	25,945	5.7	24.1	47.6	22.6	0.0
Farms by Geography	1,117	1.5	14.1	53.4	31.0	0.0
Family Distribution by Income Level	86,645	21.4	17.8	20.5	40.3	0.0
Household Distribution by Income Level	146,235	25.1	15.3	17.0	42.6	0.0
Median Family Income MSA - 21660 Eugene-Springfield, OR MSA		\$57,766	Median Housing Value			\$227,588
			Median Gross Rent			\$863
			Families Below Poverty Level			11.8%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Salem MSA

The Salem MSA AA #41420 consists of Marion and Polk counties. According to the 2015 ACS Census, the AA comprises 2 low-, 16 moderate-, 33 middle-, and 19 upper-income tracts. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Salem AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	70	2.9	22.9	47.1	27.1	0.0
Population by Geography	400,523	2.5	24.3	46.5	26.6	0.0
Housing Units by Geography	152,966	2.4	22.3	46.9	28.4	0.0
Owner-Occupied Units by Geography	86,426	1.0	15.3	51.4	32.3	0.0
Occupied Rental Units by Geography	56,028	4.4	32.2	40.5	22.9	0.0
Vacant Units by Geography	10,512	3.1	27.3	44.4	25.1	0.0
Businesses by Geography	26,952	2.7	22.5	42.1	32.7	0.0
Farms by Geography	1,884	1.2	10.8	49.9	38.1	0.0
Family Distribution by Income Level	98,277	21.5	17.2	20.5	40.7	0.0
Household Distribution by Income Level	142,454	23.4	16.4	19.1	41.2	0.0
Median Family Income MSA - 41420 Salem, OR MSA		\$58,033	Median Housing Value			\$194,292
			Median Gross Rent			\$807
			Families Below Poverty Level			13.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

IDAHO STATE

Boise MSA

The Boise MSA AA consists of Canyon County and represents a portion of the Boise City MSA #14260. According to the 2015 ACS Census, the AA comprises 4 low-, 15 moderate-, 8 middle-, and 2 upper-income tracts. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Boise AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	13.8	51.7	27.6	6.9	0.0
Population by Geography	198,921	6.9	51.8	36.7	4.6	0.0
Housing Units by Geography	70,720	7.5	51.4	36.1	5.0	0.0
Owner-Occupied Units by Geography	45,221	3.3	49.4	41.1	6.2	0.0
Occupied Rental Units by Geography	20,586	15.7	56.8	25.4	2.0	0.0
Vacant Units by Geography	4,913	12.1	47.0	34.0	6.9	0.0
Businesses by Geography	10,494	9.0	49.0	35.6	6.4	0.0
Farms by Geography	786	3.2	39.7	48.1	9.0	0.0
Family Distribution by Income Level	47,514	26.0	24.1	23.5	26.3	0.0
Household Distribution by Income Level	65,807	26.8	20.3	21.3	31.6	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$61,722	Median Housing Value			\$127,290
			Median Gross Rent			\$752
			Families Below Poverty Level			14.2%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Coeur d'Alene MSA

The Coeur d'Alene MSA #17660 consists of Kootenai County. According to the 2015 ACS Census, the AA comprises 5 moderate-, 16 middle-, and 4 upper-income tracts. There are no low-income tracts in the AA. There have been no changes to the AA since the last examination.

Demographic Information of the Assessment Area						
Assessment Area: Coeur d’Alene AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	20.0	64.0	16.0	0.0
Population by Geography	145,046	0.0	18.1	68.7	13.1	0.0
Housing Units by Geography	65,272	0.0	17.2	68.9	13.8	0.0
Owner-Occupied Units by Geography	39,582	0.0	12.8	72.0	15.3	0.0
Occupied Rental Units by Geography	16,839	0.0	30.3	61.6	8.1	0.0
Vacant Units by Geography	8,851	0.0	12.4	69.5	18.1	0.0
Businesses by Geography	11,144	0.0	21.9	65.2	12.8	0.0
Farms by Geography	397	0.0	14.6	69.8	15.6	0.0
Family Distribution by Income Level	38,705	18.0	20.3	22.7	39.0	0.0
Household Distribution by Income Level	56,421	21.8	17.7	19.8	40.7	0.0
Median Family Income MSA - 17660 Coeur d'Alene, ID MSA		\$58,966	Median Housing Value			\$203,695
			Median Gross Rent			\$868
			Families Below Poverty Level			9.4%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Twin Falls MSA

The Twin Falls MSA AA consists of Twin Falls County and represents a portion of the Twin Falls MSA #46300. According to the 2015 ACS Census, the AA comprises 1 moderate-, 11 middle-, and 2 upper-income tracts. No tracts are designated as low-income. The AA was designated as a Non-MSA at the last examination, but has not changed geographically.

Demographic Information of the Assessment Area						
Assessment Area: Twin Falls AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	7.1	78.6	14.3	0.0
Population by Geography	80,004	0.0	4.7	85.4	9.9	0.0
Housing Units by Geography	31,577	0.0	4.9	85.3	9.9	0.0
Owner-Occupied Units by Geography	19,207	0.0	2.6	84.7	12.7	0.0
Occupied Rental Units by Geography	9,810	0.0	8.8	85.9	5.3	0.0
Vacant Units by Geography	2,560	0.0	6.4	87.8	5.8	0.0
Businesses by Geography	5,181	0.0	10.3	76.4	13.3	0.0
Farms by Geography	509	0.0	1.8	86.2	12.0	0.0
Family Distribution by Income Level	20,654	18.5	18.3	22.2	41.0	0.0
Household Distribution by Income Level	29,017	20.7	18.3	18.7	42.3	0.0
Median Family Income MSA - 46300 Twin Falls, ID MSA		\$51,434	Median Housing Value			\$150,108
			Median Gross Rent			\$728
			Families Below Poverty Level			11.7%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

GEOGRAPHIC DISTRIBUTION AND BORROWER PROFILE TABLES -LIMITED-SCOPE ASSESSMENT AREAS

Washington

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bellingham AA	19	4,512	7.9	4,362	1.6	5.3	1.8	5.5	0.0	6.3	72.7	78.9	75.1	14.9	10.5	12.8	5.3	5.3	4.0
Lewiston AA	12	2,349	5.0	305	0.0	0.0	0.0	39.0	66.7	34.8	44.7	16.7	43.9	16.3	16.7	21.3	0.0	0.0	0.0
Longview AA	35	11,745	14.5	1,135	28.9	45.7	26.1	7.8	11.4	9.4	40.7	31.4	42.6	22.6	11.4	21.9	0.0	0.0	0.0
Spokane AA	70	19,017	29.0	7,514	3.3	7.1	2.5	30.9	31.4	28.9	38.1	35.7	37.3	26.7	25.7	30.6	0.9	0.0	0.6
CB WA Non MSA AA	56	12,435	23.2	2,121	2.9	1.8	1.7	11.1	19.6	13.8	65.1	44.6	61.9	20.9	33.9	22.7	0.0	0.0	0.0
Yakima AA	49	9,885	20.3	2,809	0.0	0.0	0.0	29.2	26.5	23.9	39.4	51.0	43.4	31.4	22.4	32.8	0.0	0.0	0.0
Total	241	59,943	100.0	18,246	4.1	9.5	3.3	20.8	24.1	19.8	50.0	42.7	50.6	23.4	23.2	25.1	1.6	0.4	1.2
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bellingham AA	18	6,859	6.9	4,617	1.6	0.0	1.7	5.4	5.6	6.5	72.8	77.8	74.2	14.7	11.1	12.9	5.5	5.6	4.8
Lewiston AA	5	520	1.9	300	0.0	0.0	0.0	39.9	60.0	33.7	45.1	0.0	45.0	15.0	40.0	21.3	0.0	0.0	0.0
Longview AA	36	12,893	13.8	1,201	28.9	47.2	26.3	7.7	8.3	8.7	40.9	36.1	40.5	22.4	8.3	24.5	0.0	0.0	0.0
Spokane AA	87	21,440	33.5	8,067	3.3	8.0	2.5	31.1	34.5	29.0	37.7	29.9	36.7	27.0	27.6	31.1	0.9	0.0	0.8
CB WA Non MSA AA	75	17,796	28.8	2,363	4.1	0.0	1.7	9.7	16.0	13.8	64.9	45.3	61.7	21.3	38.7	22.9	0.0	0.0	0.0
Yakima AA	39	13,785	15.0	3,006	0.0	0.0	0.0	29.0	35.9	24.9	39.3	56.4	42.9	31.7	7.7	32.2	0.0	0.0	0.0
Total	260	73,293	100.0	19,554	4.3	9.2	3.2	20.7	24.2	20.0	49.8	41.9	49.9	23.6	24.2	25.4	1.7	0.4	1.4
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bellingham AA	19	6,395	7.6	--	1.6	10.5	--	5.4	0.0	--	72.8	63.2	--	14.7	15.8	--	5.5	10.5	--
Lewiston AA	6	1,689	2.4	--	0.0	0.0	--	39.9	50.0	--	45.1	16.7	--	15.0	33.3	--	0.0	0.0	--
Longview AA	37	9,763	14.9	--	28.9	43.2	--	7.7	10.8	--	40.9	37.8	--	22.4	8.1	--	0.0	0.0	--
Spokane AA	71	20,144	28.5	--	3.3	1.4	--	31.1	23.9	--	37.7	36.6	--	27.0	36.6	--	0.9	1.4	--
WA Non MSA AA	68	17,188	27.3	--	4.1	0.0	--	9.7	13.2	--	64.9	57.4	--	21.3	29.4	--	0.0	0.0	--
Yakima AA	48	14,283	19.3	--	0.0	0.0	--	29.0	33.3	--	39.3	45.8	--	31.7	20.8	--	0.0	0.0	--
Total	249	69,462	100.0	--	4.3	7.6	--	20.7	19.7	--	49.8	45.8	--	23.6	25.7	--	1.7	1.2	--
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bellingham AA	19	4,512	7.9	4,362	87.4	31.6	47.7	5.1	68.4	7.5	0.0
Lewiston AA	12	2,349	5.0	305	81.4	33.3	64.9	4.8	66.7	13.8	0.0
Longview AA	35	11,745	14.5	1,135	81.6	20.0	43.2	6.1	80.0	12.3	0.0
Spokane AA	70	19,017	29.0	7,514	82.8	50.0	49.1	6.0	48.6	11.3	1.4
WA Non-MSA AA	56	12,435	23.2	2,121	78.7	53.6	55.2	5.1	46.4	16.2	0.0
Yakima AA	49	9,885	20.3	2,809	79.9	49.0	53.4	6.4	44.9	13.8	6.1
Total	241	59,943	100.0	18,246	82.9	44.0	50.0	5.7	54.4	11.4	1.7
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bellingham AA	18	6,859	6.9	4,617	87.1	44.4	43.9	4.9	50.0	7.9	5.6
Lewiston AA	5	520	1.9	300	82.2	20.0	68.3	4.4	80.0	13.4	0.0
Longview AA	36	12,893	13.8	1,201	81.7	16.7	44.0	5.9	83.3	12.4	0.0
Spokane AA	87	21,440	33.5	8,067	83.4	55.2	46.9	5.6	44.8	11.0	0.0
WA Non-MSA AA	75	17,796	28.8	2,363	79.2	64.0	53.3	4.8	36.0	16.0	0.0
Yakima AA	39	13,785	15.0	3,006	79.9	53.8	49.8	6.3	43.6	13.8	2.6
Total	260	73,293	100.0	19,554	83.1	50.8	47.6	5.5	48.5	11.4	0.8
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bellingham AA	19	6,395	7.6	--	87.1	21.1	--	4.9	78.9	7.9	0.0
Lewiston AA	6	1,689	2.4	--	82.2	33.3	--	4.4	66.7	13.4	0.0
Longview AA	37	9,763	14.9	--	81.7	29.7	--	5.9	70.3	12.4	0.0
Spokane AA	71	20,144	28.5	--	83.4	64.8	--	5.6	35.2	11.0	0.0
WA Non-MSA AA	68	17,188	27.3	--	79.2	60.3	--	4.8	38.2	16.0	1.5
Yakima AA	48	14,283	19.3	--	79.9	58.3	--	6.3	35.4	13.8	6.3
Total	249	69,462	100.0	--	83.1	53.0	--	5.5	45.4	11.4	1.6
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bellingham AA	8	2,694	13.6	7,190	1.0	0.0	1.5	4.1	12.5	4.7	77.8	50.0	80.1	17.0	25.0	13.5	0.1	12.5	0.3
Lewiston AA	1	149	1.7	574	0.0	0.0	0.0	21.4	100.0	23.9	55.7	0.0	56.8	22.9	0.0	19.3	0.0	0.0	0.0
Longview AA	7	6,916	11.9	4,565	4.3	14.3	4.8	9.0	28.6	9.2	50.3	57.1	52.3	36.3	0.0	33.7	0.0	0.0	0.0
Spokane AA	11	4,410	18.6	18,642	0.1	9.1	0.1	17.8	27.3	21.4	45.1	36.4	42.7	36.7	27.3	35.1	0.4	0.0	0.6
WA Non MSA AA	28	7,408	47.5	3,959	1.3	7.1	2.0	8.7	0.0	6.9	67.9	64.3	67.1	22.1	28.6	23.9	0.0	0.0	0.0
Yakima AA	4	4,150	6.8	5,070	0.0	0.0	0.0	17.6	0.0	13.1	41.2	100.0	39.1	41.3	0.0	47.8	0.0	0.0	0.0
Total	59	25,728	100.0	40,000	0.8	6.8	1.1	13.5	11.9	14.6	53.7	57.6	52.7	31.9	22.0	31.4	0.2	1.7	0.3
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bellingham AA	8	2,179	6.8	6,970	1.0	0.0	1.3	4.1	0.0	4.4	77.8	62.5	80.7	17.0	37.5	13.4	0.1	0.0	0.1
Lewiston AA	2	477	1.7	635	0.0	0.0	0.0	21.4	0.0	25.0	55.7	50.0	55.1	22.9	50.0	19.8	0.0	0.0	0.0
Longview AA	13	2,783	11.1	4,718	4.3	0.0	5.6	9.0	0.0	10.7	50.3	76.9	51.3	36.3	23.1	32.5	0.0	0.0	0.0
Spokane AA	23	4,157	19.7	21,250	0.1	0.0	0.1	17.8	39.1	22.2	45.1	26.1	41.8	36.7	34.8	35.4	0.4	0.0	0.4
WA Non MSA AA	58	10,591	49.6	4,405	1.3	0.0	2.2	8.7	6.9	7.2	67.9	51.7	66.7	22.1	41.4	23.9	0.0	0.0	0.0
Yakima AA	13	2,289	11.1	5,313	0.0	0.0	0.0	17.6	7.7	12.1	41.2	30.8	39.9	41.3	61.5	48.0	0.0	0.0	0.0
Total	117	22,475	100.0	43,291	0.8	0.0	1.1	13.5	12.0	15.4	53.7	47.9	51.6	31.9	40.2	31.7	0.2	0.0	0.2
Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bellingham AA	14	4,175	11.4	--	1.0	0.0	--	4.1	14.3	--	77.8	64.3	--	17.0	21.4	--	0.1	0.0	--
Lewiston AA	4	626	3.3	--	0.0	0.0	--	21.4	50.0	--	55.7	50.0	--	22.9	0.0	--	0.0	0.0	--
Longview AA	14	5,970	11.4	--	4.3	0.0	--	9.0	0.0	--	50.3	64.3	--	36.3	35.7	--	0.0	0.0	--
Spokane AA	38	11,165	30.9	--	0.1	0.0	--	17.8	21.1	--	46.9	39.5	--	34.9	36.8	--	0.4	2.6	--
WA Non MSA AA	45	10,830	36.6	--	1.3	0.0	--	8.7	6.7	--	67.9	60.0	--	22.1	33.3	--	0.0	0.0	--
Yakima AA	8	3,341	6.5	--	0.0	0.0	--	17.6	37.5	--	41.2	25.0	--	41.3	37.5	--	0.0	0.0	--
Total	123	36,107	100.0	--	0.8	0.0	--	13.5	14.6	--	54.4	52.0	--	31.2	32.5	--	0.2	0.8	--
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bellingham AA	8	2,694	13.6	7,190	20.8	0.0	3.3	17.1	25.0	14.5	22.5	12.5	24.1	39.6	37.5	48.9	0.0	25.0	9.1
Lewiston AA	1	149	1.7	574	20.4	0.0	3.0	21.3	0.0	14.1	22.0	100.0	26.0	36.4	0.0	42.7	0.0	0.0	14.3
Longview AA	7	6,916	11.9	4,565	20.6	0.0	2.2	18.1	0.0	9.8	21.7	14.3	23.3	39.6	57.1	50.1	0.0	28.6	14.7
Spokane AA	11	4,410	18.6	18,642	20.1	0.0	5.6	16.8	9.1	18.6	22.0	27.3	22.5	41.2	27.3	38.5	0.0	36.4	14.9
WA Non-MSA AA	28	7,408	47.5	3,959	22.1	7.1	5.7	18.6	25.0	15.4	21.1	21.4	24.6	38.1	25.0	40.3	0.0	21.4	14.0
Yakima AA	4	4,150	6.8	5,070	20.2	0.0	4.0	18.1	25.0	13.8	20.6	50.0	23.2	41.1	0.0	48.0	0.0	25.0	11.0
Total	59	25,728	100.0	40,000	20.6	3.4	4.6	17.5	18.6	15.9	21.7	23.7	23.2	40.3	28.8	43.1	0.0	25.4	13.2
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bellingham AA	8	2,179	6.8	6,970	20.8	0.0	4.6	17.1	25.0	15.7	22.5	25.0	25.8	39.6	37.5	44.2	0.0	12.5	9.6
Lewiston AA	2	477	1.7	635	20.4	0.0	8.7	21.3	0.0	23.6	22.0	0.0	26.0	36.4	100.0	28.5	0.0	0.0	13.2
Longview AA	13	2,783	11.1	4,718	20.6	0.0	4.1	18.1	7.7	16.3	21.7	30.8	26.7	39.6	53.8	37.0	0.0	7.7	15.7
Spokane AA	23	4,157	19.7	21,250	20.1	0.0	4.5	16.8	13.0	16.7	22.0	8.7	22.9	41.2	39.1	41.1	0.0	39.1	14.9
WA Non-MSA AA	58	10,591	49.6	4,405	22.1	8.6	5.6	18.6	12.1	15.3	21.1	15.5	22.9	38.1	46.6	40.8	0.0	17.2	15.4
Yakima AA	13	2,289	11.1	5,313	20.2	0.0	3.4	18.1	23.1	12.5	20.6	30.8	22.4	41.1	38.5	47.9	0.0	7.7	13.8
Total	117	22,475	100.0	43,291	20.6	4.3	4.5	17.5	13.7	15.9	21.7	17.9	23.8	40.3	45.3	41.8	0.0	18.8	14.0
Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bellingham AA	14	4,175	11.4	--	20.8	7.1	--	17.1	14.3	--	22.5	21.4	--	39.6	50.0	--	0.0	7.1	--
Lewiston AA	4	626	3.3	--	20.4	0.0	--	21.3	50.0	--	22.0	0.0	--	36.4	50.0	--	0.0	0.0	--
Longview AA	14	5,970	11.4	--	20.6	14.3	--	18.1	7.1	--	21.7	14.3	--	39.6	57.1	--	0.0	7.1	--
Spokane AA	38	11,165	30.9	--	20.1	2.6	--	16.8	15.8	--	22.0	23.7	--	41.2	34.2	--	0.0	23.7	--
WA Non-MSA AA	45	10,830	36.6	--	22.1	4.4	--	18.6	13.3	--	21.1	15.6	--	38.1	48.9	--	0.0	17.8	--
Yakima AA	8	3,341	6.5	--	20.2	0.0	--	18.1	0.0	--	20.6	0.0	--	41.1	75.0	--	0.0	25.0	--
Total	123	36,107	100.0	--	20.6	4.9	--	17.5	13.8	--	21.7	17.1	--	40.3	47.2	--	0.0	17.1	--
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bellingham AA	1	125	1.0	177	1.1	0.0	0.6	2.9	0.0	1.7	82.6	100.0	78.0	13.3	0.0	18.1	0.2	0.0	1.7
Lewiston AA	6	619	6.0	30	0.0	0.0	0.0	13.2	0.0	6.7	39.5	33.3	16.7	47.4	66.7	76.7	0.0	0.0	0.0
Longview AA	0	0	0.0	13	16.9	0.0	0.0	6.2	0.0	15.4	48.3	0.0	61.5	28.7	0.0	23.1	0.0	0.0	0.0
Spokane AA	2	347	2.0	121	0.7	0.0	0.0	12.2	0.0	4.1	48.4	50.0	54.5	38.7	50.0	41.3	0.0	0.0	0.0
WA Non MSA AA	84	13,382	84.0	675	0.5	0.0	0.0	13.4	8.3	13.0	69.7	89.3	71.9	16.4	2.4	15.1	0.0	0.0	0.0
Yakima AA	7	2,048	7.0	316	0.0	0.0	0.0	7.6	0.0	2.2	57.1	85.7	68.7	35.3	14.3	29.1	0.0	0.0	0.0
Total	100	16,521	100.0	1,332	1.1	0.0	0.1	9.7	7.0	8.0	63.3	85.0	69.0	25.9	8.0	22.7	0.0	0.0	0.2
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bellingham AA	0	0	0.0	183	1.3	0.0	0.0	2.4	0.0	2.2	81.8	0.0	73.2	14.3	0.0	24.6	0.2	0.0	0.0
Lewiston AA	2	300	2.3	35	0.0	0.0	0.0	13.8	0.0	2.9	41.3	0.0	8.6	45.0	100.0	88.6	0.0	0.0	0.0
Longview AA	0	0	0.0	23	19.5	0.0	0.0	5.6	0.0	21.7	46.7	0.0	52.2	28.2	0.0	26.1	0.0	0.0	0.0
Spokane AA	4	491	4.7	154	0.5	0.0	0.0	12.9	0.0	10.4	46.0	50.0	45.5	40.6	50.0	44.2	0.0	0.0	0.0
WA Non-MSA AA	70	12,637	81.4	661	0.6	0.0	0.0	12.7	5.7	12.4	69.6	88.6	71.3	17.1	5.7	16.3	0.0	0.0	0.0
Yakima AA	10	2,499	11.6	308	0.0	0.0	0.0	8.1	0.0	4.2	56.2	70.0	63.0	35.7	30.0	32.8	0.0	0.0	0.0
Total	86	15,927	100.0	1,364	1.3	0.0	0.0	9.7	4.7	8.9	62.1	82.6	64.8	27.0	12.8	26.3	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bellingham AA	0	0	0.0	--	1.3	0.0	--	2.4	0.0	--	81.8	0.0	--	14.3	0.0	--	0.2	0.0	--
Lewiston AA	3	400	3.0	--	0.0	0.0	--	13.8	0.0	--	41.3	0.0	--	45.0	100.0	--	0.0	0.0	--
Longview AA	0	0	0.0	--	19.5	0.0	--	5.6	0.0	--	46.7	0.0	--	28.2	0.0	--	0.0	0.0	--
Spokane AA	9	2,091	9.0	--	0.5	0.0	--	12.9	0.0	--	46.0	22.2	--	40.6	77.8	--	0.0	0.0	--
WA Non-MSA AA	78	16,122	78.0	--	0.6	0.0	--	12.7	9.0	--	69.6	88.5	--	17.1	2.6	--	0.0	0.0	--
Yakima AA	10	2,913	10.0	--	0.0	0.0	--	8.1	0.0	--	56.2	60.0	--	35.7	40.0	--	0.0	0.0	--
Total	100	21,526	100.0	--	1.3	0.0	--	9.7	7.0	--	62.1	77.0	--	27.0	16.0	--	0.0	0.0	--
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bellingham AA	1	125	1.0	177	95.8	100.0	45.2	2.8	0.0	1.5	0.0
Lewiston AA	6	619	6.0	30	100.0	100.0	100.0	0.0	0.0	0.0	0.0
Longview AA	0	0	0.0	13	92.1	0.0	38.5	3.4	0.0	4.5	0.0
Spokane AA	2	347	2.0	121	96.3	100.0	52.1	2.5	0.0	1.2	0.0
WA Non-MSA AA	84	13,382	84.0	675	94.2	96.4	56.9	3.7	3.6	2.1	0.0
Yakima AA	7	2,048	7.0	316	87.3	85.7	52.2	9.8	14.3	2.9	0.0
Total	100	16,521	100.0	1,332	93.4	96.0	54.6	4.5	4.0	2.0	0.0
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bellingham AA	0	0	0.0	183	95.7	0.0	33.9	2.6	0.0	1.7	0.0
Lewiston AA	2	300	2.3	35	98.8	100.0	82.9	0.0	0.0	1.3	0.0
Longview AA	0	0	0.0	23	93.8	0.0	30.4	2.1	0.0	4.1	0.0
Spokane AA	4	491	4.7	154	95.9	100.0	46.8	2.4	0.0	1.7	0.0
WA Non-MSA AA	70	12,637	81.4	661	93.8	95.7	56.6	3.9	4.3	2.3	0.0
Yakima AA	10	2,499	11.6	308	87.2	70.0	44.8	9.9	30.0	2.9	0.0
Total	86	15,927	100.0	1,364	93.3	93.0	50.0	4.5	7.0	2.2	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bellingham AA	0	0	0.0	--	95.7	0.0	--	2.6	0.0	1.7	0.0
Lewiston AA	3	400	3.0	--	98.8	66.7	--	0.0	33.3	1.3	0.0
Longview AA	0	0	0.0	--	93.8	0.0	--	2.1	0.0	4.1	0.0
Spokane AA	9	2,091	9.0	--	95.9	100.0	--	2.4	0.0	1.7	0.0
WA Non-MSA AA	78	16,122	78.0	--	93.8	91.0	--	3.9	9.0	2.3	0.0
Yakima AA	10	2,913	10.0	--	87.2	90.0	--	9.9	10.0	2.9	0.0
Total	100	21,526	100.0	--	93.3	91.0	--	4.5	9.0	2.2	0.0
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

Oregon

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Bend AA	127	35,432	16.5	5,485	0.0	0.0	0.0	32.9	44.1	29.9	42.5	26.8	42.7	24.6	29.1	27.4	0.0	0.0	0.0	
Eugene AA	437	85,022	56.8	6,020	5.5	11.2	6.2	24.2	30.9	24.1	47.8	38.9	46.5	22.6	19.0	23.2	0.0	0.0	0.0	
Salem AA	205	57,516	26.7	6,154	2.6	7.8	3.1	22.2	33.2	20.5	42.2	37.6	41.5	33.0	21.5	35.0	0.0	0.0	0.0	
Total	769	177,970	100.0	17,659	3.0	8.5	3.2	25.6	33.7	24.7	44.3	36.5	43.6	27.0	21.3	28.6	0.0	0.0	0.0	
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2018
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Bend AA	109	31,797	15.9	5,972	0.0	0.0	0.0	32.8	38.5	29.0	42.6	36.7	43.5	24.6	24.8	27.5	0.0	0.0	0.0	
Eugene AA	338	79,483	49.3	6,623	5.7	10.1	5.7	24.1	34.9	24.9	47.6	34.9	46.7	22.6	20.1	22.8	0.0	0.0	0.0	
Salem AA	239	58,456	34.8	6,924	2.7	5.4	2.7	22.5	29.3	21.1	42.1	46.4	41.9	32.7	18.8	34.4	0.0	0.0	0.0	
Total	686	169,736	100.0	19,519	3.1	6.9	2.9	25.7	33.5	24.8	44.3	39.2	44.0	26.9	20.4	28.3	0.0	0.0	0.0	
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bend AA	100	28,838	19.4	--	0.0	0.0	--	32.8	51.0	--	42.6	25.0	--	24.6	24.0	--	0.0	0.0	--
Eugene AA	219	52,584	42.5	--	5.7	10.0	--	24.1	32.4	--	47.6	42.5	--	22.6	15.1	--	0.0	0.0	--
Salem AA	196	47,072	38.1	--	2.7	7.1	--	22.5	27.0	--	42.1	40.8	--	32.7	25.0	--	0.0	0.0	--
Total	515	128,494	100.0	--	3.1	7.0	--	25.7	34.0	--	44.3	38.4	--	26.9	20.6	--	0.0	0.0	--
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bend AA	127	35,432	16.5	5,485	88.8	26.8	50.9	4.2	73.2	7.0	0.0
Eugene AA	437	85,022	56.8	6,020	86.1	37.8	52.6	5.1	57.9	8.8	4.3
Salem AA	205	57,516	26.7	6,154	85.8	37.6	52.3	4.3	62.0	9.9	0.5
Total	769	177,970	100.0	17,659	86.6	35.9	52.0	4.6	61.5	8.8	2.6
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bend AA	109	31,797	15.9	5,972	88.8	31.2	47.9	4.1	68.8	7.1	0.0
Eugene AA	338	79,483	49.3	6,623	85.7	41.4	49.6	5.1	58.3	9.2	0.3
Salem AA	239	58,456	34.8	6,924	85.7	52.3	48.2	4.2	47.7	10.1	0.0
Total	686	169,736	100.0	19,519	86.5	43.6	48.6	4.5	56.3	9.0	0.1
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bend AA	100	28,838	19.4	--	88.8	39.0	--	4.1	61.0	7.1	0.0
Eugene AA	219	52,584	42.5	--	85.7	37.4	--	5.1	62.1	9.2	0.5
Salem AA	196	47,072	38.1	--	85.7	46.4	--	4.2	53.6	10.1	0.0
Total	515	128,494	100.0	--	86.5	41.2	--	4.5	58.6	9.0	0.2
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bend AA	20	9,457	23.3	9,574	0.0	0.0	0.0	19.1	15.0	19.9	59.1	60.0	60.7	21.8	25.0	19.4	0.0	0.0	0.0
Eugene AA	22	10,389	25.6	11,019	0.9	13.6	0.9	16.9	27.3	17.8	57.2	45.5	58.1	25.0	13.6	23.1	0.0	0.0	0.0
Salem AA	44	12,067	51.2	14,482	1.0	0.0	1.3	15.3	11.4	16.7	51.4	56.8	49.4	32.3	31.8	32.6	0.0	0.0	0.0
Total	86	31,912	100.0	35,075	0.7	3.5	0.8	16.7	16.3	17.9	55.3	54.7	55.2	27.3	25.6	26.0	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Bend AA	36	8,888	14.2	10,460	0.0	0.0	0.0	19.1	11.1	18.5	59.1	50.0	60.6	21.8	38.9	20.9	0.0	0.0	0.0	
Eugene AA	44	9,839	17.4	12,553	0.9	0.0	1.1	16.9	6.8	18.0	57.2	61.4	57.9	25.0	31.8	23.0	0.0	0.0	0.0	
Salem AA	173	36,879	68.4	15,059	1.0	1.2	1.4	15.3	11.6	16.4	51.4	49.1	49.9	32.3	38.2	32.3	0.0	0.0	0.0	
Total	253	55,606	100.0	38,072	0.7	0.8	0.9	16.7	10.7	17.5	55.3	51.4	55.5	27.3	37.2	26.1	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bend AA	37	14,617	17.0	--	0.0	0.0	--	19.1	13.5	--	59.1	70.3	--	21.8	16.2	--	0.0	0.0	--
Eugene AA	53	16,142	24.3	--	0.9	1.9	--	16.9	5.7	--	57.2	54.7	--	25.0	37.7	--	0.0	0.0	--
Salem AA	128	27,352	58.7	--	1.0	0.0	--	15.3	14.1	--	51.4	50.8	--	32.3	35.2	--	0.0	0.0	--
Total	218	58,110	100.0	--	0.7	0.5	--	16.7	11.9	--	55.3	55.0	--	27.3	32.6	--	0.0	0.0	--
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bend AA	20	9,457	23.3	9,574	21.7	0.0	2.5	18.7	10.0	12.4	19.8	25.0	21.8	39.8	45.0	53.1	0.0	20.0	10.2
Eugene AA	22	10,389	25.6	11,019	21.4	0.0	2.9	17.8	0.0	14.8	20.5	0.0	22.5	40.3	31.8	45.1	0.0	68.2	14.6
Salem AA	44	12,067	51.2	14,482	21.5	4.5	2.4	17.2	20.5	12.7	20.5	31.8	25.2	40.7	25.0	44.7	0.0	18.2	14.9
Total	86	31,912	100.0	35,075	21.5	2.3	2.6	17.7	12.8	13.3	20.4	22.1	23.4	40.4	31.4	47.1	0.0	31.4	13.5
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bend AA	36	8,888	14.2	10,460	21.7	2.8	3.3	18.7	8.3	12.4	19.8	13.9	22.0	39.8	69.4	52.5	0.0	5.6	9.8
Eugene AA	44	9,839	17.4	12,553	21.4	0.0	4.4	17.8	6.8	15.2	20.5	15.9	23.5	40.3	59.1	45.4	0.0	18.2	11.5
Salem AA	173	36,879	68.4	15,059	21.5	7.5	3.7	17.2	15.0	15.8	20.5	16.2	26.6	40.7	52.0	39.9	0.0	9.2	14.1
Total	253	55,606	100.0	38,072	21.5	5.5	3.8	17.7	12.6	14.6	20.4	15.8	24.3	40.4	55.7	45.2	0.0	10.3	12.1
Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bend AA	37	14,617	17.0	--	21.7	2.7	--	18.7	18.9	--	19.8	8.1	--	39.8	56.8	--	0.0	13.5	--
Eugene AA	53	16,142	24.3	--	21.4	3.8	--	17.8	5.7	--	20.5	11.3	--	40.3	67.9	--	0.0	11.3	--
Salem AA	128	27,352	58.7	--	21.5	7.0	--	17.2	17.2	--	20.5	18.0	--	40.7	52.3	--	0.0	5.5	--
Total	218	58,110	100.0	--	21.5	5.5	--	17.7	14.7	--	20.4	14.7	--	40.4	56.9	--	0.0	8.3	--
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bend AA	7	1,312	7.7	91	0.0	0.0	0.0	19.2	0.0	12.1	61.0	42.9	67.0	19.8	57.1	20.9	0.0	0.0	0.0
Eugene AA	5	1,753	5.5	131	1.7	0.0	1.5	14.1	0.0	9.9	53.2	60.0	50.4	30.9	40.0	38.2	0.0	0.0	0.0
Salem AA	79	18,661	86.8	400	1.0	1.3	1.0	10.0	5.1	4.3	51.2	49.4	53.3	37.7	44.3	41.5	0.0	0.0	0.0
Total	91	21,726	100.0	622	1.0	1.1	1.0	13.1	4.4	6.6	53.8	49.5	54.7	32.2	45.1	37.8	0.0	0.0	0.0
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bend AA	4	1,269	4.3	85	0.0	0.0	0.0	19.5	0.0	12.9	61.4	50.0	70.6	19.1	50.0	16.5	0.0	0.0	0.0
Eugene AA	4	1,468	4.3	146	1.5	0.0	1.4	14.1	75.0	14.4	53.4	25.0	49.3	31.0	0.0	34.9	0.0	0.0	0.0
Salem AA	85	19,478	91.4	401	1.2	0.0	0.2	10.8	4.7	5.2	49.9	51.8	52.9	38.1	43.5	41.6	0.0	0.0	0.0
Total	93	22,215	100.0	632	1.1	0.0	0.5	13.5	7.5	8.4	53.2	50.5	54.4	32.3	41.9	36.7	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bend AA	4	1,103	4.3	--	0.0	0.0	--	19.5	0.0	--	61.4	50.0	--	19.1	50.0	--	0.0	0.0	--
Eugene AA	5	1,735	5.4	--	1.5	0.0	--	14.1	80.0	--	53.4	20.0	--	31.0	0.0	--	0.0	0.0	--
Salem AA	84	19,638	90.3	--	1.2	0.0	--	10.8	8.3	--	49.9	44.0	--	38.1	47.6	--	0.0	0.0	--
Total	93	22,476	100.0	--	1.1	0.0	--	13.5	11.8	--	53.2	43.0	--	32.3	45.2	--	0.0	0.0	--
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bend AA	7	1,312	7.7	91	97.7	85.7	71.4	1.9	14.3	0.4	0.0
Eugene AA	5	1,753	5.5	131	96.3	20.0	61.8	2.5	80.0	1.2	0.0
Salem AA	79	18,661	86.8	400	92.3	60.8	45.8	6.0	39.2	1.6	0.0
Total	91	21,726	100.0	622	94.6	60.4	52.9	4.2	39.6	1.3	0.0
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bend AA	4	1,269	4.3	85	97.8	75.0	54.1	1.8	25.0	0.4	0.0
Eugene AA	4	1,468	4.3	146	96.0	25.0	56.2	2.8	75.0	1.3	0.0
Salem AA	85	19,478	91.4	401	92.2	55.3	46.1	5.9	44.7	1.9	0.0
Total	93	22,215	100.0	632	94.4	54.8	49.5	4.2	45.2	1.4	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bend AA	4	1,103	4.3	--	97.8	75.0	--	1.8	25.0	0.4	0.0
Eugene AA	5	1,735	5.4	--	96.0	20.0	--	2.8	80.0	1.3	0.0
Salem AA	84	19,638	90.3	--	92.2	52.4	--	5.9	47.6	1.9	0.0
Total	93	22,476	100.0	--	94.4	51.6	--	4.2	48.4	1.4	0.0
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

Idaho

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boise AA	36	6,576	32.4	3,148	9.3	16.7	8.5	48.9	44.4	45.0	35.5	33.3	38.5	6.3	5.6	8.0	0.0	0.0	0.0
Coeur d'Alene AA	61	16,716	55.0	3,319	0.0	0.0	0.0	22.3	29.5	19.0	65.0	59.0	68.5	12.7	11.5	12.4	0.0	0.0	0.0
Twin Falls AA	14	2,727	12.6	1,424	0.0	0.0	0.0	10.7	0.0	9.4	75.9	71.4	79.1	13.4	28.6	11.5	0.0	0.0	0.0
Total	111	26,020	100.0	7,891	3.7	5.4	3.4	30.4	30.6	27.7	55.6	52.3	58.4	10.3	11.7	10.5	0.0	0.0	0.0
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boise AA	38	7,843	38.0	3,143	9.0	18.4	8.1	49.0	55.3	42.4	35.6	23.7	42.0	6.4	2.6	7.5	0.0	0.0	0.0
Coeur d'Alene AA	56	13,614	56.0	3,562	0.0	0.0	0.0	21.9	30.4	18.8	65.2	64.3	68.2	12.9	5.4	13.0	0.0	0.0	0.0
Twin Falls AA	6	1,530	6.0	1,466	0.0	0.0	0.0	10.3	33.3	8.6	76.4	50.0	76.9	13.3	16.7	14.5	0.0	0.0	0.0
Total	100	22,987	100.0	8,171	3.5	7.0	3.1	30.3	40.0	26.0	55.8	48.0	59.7	10.4	5.0	11.1	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boise AA	53	12,697	43.4	--	9.0	18.9	--	49.0	50.9	--	35.6	28.3	--	6.4	1.9	--	0.0	0.0	--
Coeur d'Alene AA	56	15,704	45.9	--	0.0	0.0	--	21.9	25.0	--	65.2	69.6	--	12.9	5.4	--	0.0	0.0	--
Twin Falls AA	13	3,675	10.7	--	0.0	0.0	--	10.3	7.7	--	76.4	76.9	--	13.3	15.4	--	0.0	0.0	--
Total	122	32,076	100.0	--	3.5	8.2	--	30.3	34.4	--	55.8	52.5	--	10.4	4.9	--	0.0	0.0	--
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boise AA	36	6,576	32.4	3,148	85.5	47.2	50.0	4.6	52.8	9.9	0.0
Coeur d'Alene AA	61	16,716	55.0	3,319	86.2	49.2	51.7	5.5	49.2	8.3	1.6
Twin Falls AA	14	2,727	12.6	1,424	80.7	64.3	52.6	5.7	35.7	13.6	0.0
Total	111	26,020	100.0	7,891	84.8	50.5	51.2	5.2	48.6	10.0	0.9
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boise AA	38	7,843	38.0	3,143	85.7	55.3	49.3	4.4	44.7	9.9	0.0
Coeur d'Alene AA	56	13,614	56.0	3,562	86.6	57.1	50.8	5.2	42.9	8.1	0.0
Twin Falls AA	6	1,530	6.0	1,466	80.6	50.0	49.5	5.4	50.0	14.0	0.0
Total	100	22,987	100.0	8,171	85.1	56.0	50.0	4.9	44.0	9.9	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boise AA	53	12,697	43.4	--	85.7	50.9	--	4.4	49.1	9.9	0.0
Coeur d'Alene AA	56	15,704	45.9	--	86.6	60.7	--	5.2	37.5	8.1	1.8
Twin Falls AA	13	3,675	10.7	--	80.6	53.8	--	5.4	46.2	14.0	0.0
Total	122	32,076	100.0	--	85.1	55.7	--	4.9	43.4	9.9	0.8
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Boise AA	9	3,438	23.7	9,215	3.3	0.0	3.6	49.4	33.3	44.2	41.1	66.7	47.3	6.2	0.0	4.9	0.0	0.0	0.0
Coeur d’Alene AA	25	12,840	65.8	7,988	0.0	0.0	0.0	12.8	24.0	16.6	72.0	72.0	71.3	15.3	4.0	12.0	0.0	0.0	0.0
Twin Falls AA	4	839	10.5	2,386	0.0	0.0	0.0	2.6	0.0	2.7	84.7	75.0	88.2	12.7	25.0	9.1	0.0	0.0	0.0
Total	38	17,117	100.0	19,589	1.4	0.0	1.7	26.8	23.7	27.9	60.9	71.1	62.1	10.8	5.3	8.3	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Boise AA	16	8,789	27.6	11,178	3.3	0.0	3.5	49.4	56.3	44.2	41.1	43.8	46.4	6.2	0.0	5.8	0.0	0.0	0.0
Coeur d’Alene AA	38	13,608	65.5	9,410	0.0	0.0	0.0	12.8	10.5	15.2	72.0	81.6	72.6	15.3	7.9	12.2	0.0	0.0	0.0
Twin Falls AA	4	428	6.9	3,165	0.0	0.0	0.0	2.6	0.0	3.0	84.7	75.0	86.6	12.7	25.0	10.3	0.0	0.0	0.0
Total	58	22,825	100.0	23,753	1.4	0.0	1.7	26.8	22.4	27.3	60.9	70.7	62.1	10.8	6.9	8.9	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Boise AA	11	2,016	22.0	--	3.3	0.0	--	49.4	45.5	--	41.1	27.3	--	6.2	27.3	--	0.0	0.0	--	
Coeur d'Alene AA	36	7,279	72.0	--	0.0	0.0	--	12.8	16.7	--	72.0	66.7	--	15.3	16.7	--	0.0	0.0	--	
Twin Falls AA	3	605	6.0	--	0.0	0.0	--	2.6	0.0	--	84.7	66.7	--	12.7	33.3	--	0.0	0.0	--	
Total	50	9,900	100.0	--	1.4	0.0	--	26.8	22.0	--	60.9	58.0	--	10.8	20.0	--	0.0	0.0	--	
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boise AA	9	3,438	23.7	9,215	26.0	0.0	10.9	24.1	11.1	27.2	23.5	22.2	24.4	26.3	55.6	25.9	0.0	11.1	11.5
Coeur d'Alene AA	25	12,840	65.8	7,988	18.0	16.0	3.3	20.3	16.0	15.3	22.7	28.0	23.0	39.0	32.0	43.6	0.0	8.0	14.7
Twin Falls AA	4	839	10.5	2,386	19.2	0.0	5.7	18.5	0.0	21.3	22.4	25.0	23.5	39.9	75.0	33.7	0.0	0.0	15.7
Total	38	17,117	100.0	19,589	21.8	10.5	7.2	21.7	13.2	21.6	23.0	26.3	23.7	33.5	42.1	34.1	0.0	7.9	13.3
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boise AA	16	8,789	27.6	11,178	26.0	0.0	10.3	24.1	25.0	27.9	23.5	25.0	26.6	26.3	43.8	26.5	0.0	6.3	8.7
Coeur d' Alene AA	38	13,608	65.5	9,410	18.0	2.6	3.6	20.3	15.8	13.6	22.7	23.7	25.0	39.0	52.6	45.0	0.0	5.3	12.8
Twin Falls AA	4	428	6.9	3,165	18.5	0.0	4.2	18.3	0.0	18.4	22.2	50.0	24.2	41.0	50.0	41.5	0.0	0.0	11.8
Total	58	22,825	100.0	23,753	21.7	1.7	6.8	21.6	17.2	21.0	23.0	25.9	25.7	33.7	50.0	35.8	0.0	5.2	10.7
Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boise AA	11	2,016	22.0	--	26.0	0.0	--	24.1	18.2	--	23.5	9.1	--	26.3	72.7	--	0.0	0.0	--
Coeur d' Alene AA	36	7,279	72.0	--	18.0	2.8	--	20.3	11.1	--	22.7	25.0	--	39.0	55.6	--	0.0	5.6	--
Twin Falls AA	3	605	6.0	--	18.5	0.0	--	18.3	33.3	--	22.2	0.0	--	41.0	66.7	--	0.0	0.0	--
Total	50	9,900	100.0	--	21.7	2.0	--	21.6	14.0	--	23.0	20.0	--	33.7	60.0	--	0.0	4.0	--
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Boise AA	57	9,091	86.4	258	3.4	0.0	0.4	39.5	22.8	34.9	48.4	56.1	51.9	8.8	21.1	12.8	0.0	0.0	0.0
Coeur d'Alene AA	2	235	3.0	46	0.0	0.0	0.0	14.5	0.0	4.3	72.1	100.0	89.1	13.4	0.0	6.5	0.0	0.0	0.0
Twin Falls AA	7	643	10.6	232	0.0	0.0	0.0	2.0	0.0	0.0	85.7	100.0	90.9	12.2	0.0	9.1	0.0	0.0	0.0
Total	66	9,969	100.0	536	1.6	0.0	0.2	22.7	19.7	17.2	64.9	62.1	72.0	10.8	18.2	10.6	0.0	0.0	0.0
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Boise AA	54	8,081	74.0	226	3.2	0.0	0.9	39.7	27.8	32.7	48.1	55.6	54.4	9.0	16.7	11.9	0.0	0.0	0.0
Coeur d'Alene AA	1	35	1.4	39	0.0	0.0	0.0	14.6	0.0	5.1	69.8	100.0	87.2	15.6	0.0	7.7	0.0	0.0	0.0
Twin Falls AA	18	1,802	24.7	204	0.0	0.0	0.0	1.8	0.0	0.5	86.2	88.9	90.7	12.0	11.1	8.8	0.0	0.0	0.0
Total	73	9,918	100.0	469	1.5	0.0	0.4	22.4	20.5	16.4	64.7	64.4	72.9	11.5	15.1	10.2	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Boise AA	51	7,491	83.6	--	3.2	0.0	--	39.7	21.6	--	48.1	62.7	--	9.0	15.7	--	0.0	0.0	--
Coeur d' Alene AA	0	0	0.0	--	0.0	0.0	--	14.6	0.0	--	69.8	0.0	--	15.6	0.0	--	0.0	0.0	--
Twin Falls AA	10	1,548	16.4	--	0.0	0.0	--	1.8	0.0	--	86.2	100.0	--	12.0	0.0	--	0.0	0.0	--
Total	61	9,039	100.0	--	1.5	0.0	--	22.4	18.0	--	64.7	68.9	--	11.5	13.1	--	0.0	0.0	--
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0																			

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boise AA	57	9,091	86.4	258	93.9	71.9	55.8	5.1	28.1	1.0	0.0
Coeur d'Alene AA	2	235	3.0	46	96.7	100.0	65.2	2.2	0.0	1.1	0.0
Twin Falls AA	7	643	10.6	232	93.0	85.7	50.4	4.8	14.3	2.2	0.0
Total	66	9,969	100.0	536	94.2	74.2	54.3	4.4	25.8	1.4	0.0
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boise AA	54	8,081	74.0	226	93.0	87.0	61.1	5.5	13.0	1.5	0.0
Coeur d'Alene AA	1	35	1.4	39	96.7	100.0	61.5	2.0	0.0	1.3	0.0
Twin Falls AA	18	1,802	24.7	204	92.3	88.9	54.9	4.3	11.1	3.3	0.0
Total	73	9,918	100.0	469	93.7	87.7	58.4	4.3	12.3	2.0	0.0
Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boise AA	51	7,491	83.6	--	93.0	84.3	--	5.5	15.7	1.5	0.0
Coeur d'Alene AA	0	0	0.0	--	96.7	0.0	--	2.0	0.0	1.3	0.0
Twin Falls AA	10	1,548	16.4	--	92.3	70.0	--	4.3	30.0	3.3	0.0
Total	61	9,039	100.0	--	93.7	82.0	--	4.3	18.0	2.0	0.0
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan

funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or

- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.